



2024

Non-Financial Information Statement and Sustainability Report

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ESRS 2 GENERAL INFORMATION

Basis for preparation

Governance

Strategy

Impact, risk and opportunity management



BASIS FOR PREPARATION

[BP-1] GENERAL BASIS FOR PREPARATION OF SUSTAINABILITY STATEMENTS

This Non-Financial Information Statement and Sustainability Report (hereinafter the “Sustainability Report” or the “Report”) meets the requirements of Law 11/2018, of 28 December, which transposes Spanish law Directive 2014/95/EU of the European Parliament regarding the preparation of the Non-Financial Information Statement. Although this document forms part of the Consolidated Directors' Report, it is presented as a separate document, as this is one of the options contemplated in Law 11/2018 on non-financial information.

With regard to the requirement of Law 11/2018 in relation to the use of non-financial key performance indicators that meet the requirements of comparability, materiality, relevance and reliability, ACCIONA Energía has prepared its Sustainability Report 2024 in accordance with the European Sustainability Reporting Standards (ESRS) published in Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, and specifically with the disclosure requirements indicated in the "Table of Contents of Law 11/2018" available in Annex 3 of this Report. In the case of tax information required by Law 11/2018, for which there are no specific disclosure requirements in the European Sustainability Reporting Standards (ESRS) published in Delegated Regulation 2023/2772, the GRI standards indicated in the "Table of Contents of Law 11/2018" mentioned above were used for the report.

The scope of the Report covers both own operations and value chain activities in all territories where the organisation operates. This approach includes the identification of significant impacts, potential risks and opportunities in sustainability issues, encompassing environmental, social and governance dimensions.

The scope of consolidation of sustainability information presented in this Report is identical to that used for the preparation of the consolidated financial statements, in accordance with the requirements set out in Article 48i of Directive 2013/34/EU. This Report includes the entities listed in the appendices to the Consolidated Financial Statements, ensuring consistency between the group's financial and non-financial information.

In the 2024 Sustainability Report, the information of all the companies that form part of the group has been consolidated. These are detailed in Appendices I, II and III of the company's Consolidated Financial Statements.

The information in this Sustainability Report has been prepared in such a way as to meet the following qualitative characteristics of the information:

- **Relevance:** The information presented in this Report seeks to respond to key issues of interest to stakeholders that have a significant impact on ACCIONA Energía's activities. This is achieved through a Dual Materiality analysis, which assesses both how sustainability affects the company's financial performance and the impact it has on its environment. This approach ensures that the data and metrics selected are not only relevant, but also offer practical value for making informed decisions.

- **Faithful representation:** The information included in the Report is a balanced and accurate reflection of ACCIONA Energía's reality. This means that both achievements and challenges are presented with full transparency, providing a complete and honest view of the risks, opportunities and impacts associated with its operations. In addition, the information is presented with the necessary level of detail for users to understand the context and the actions taken by the company, without omitting critical aspects.
- **Comparability:** This Report is designed to enable users to assess ACCIONA Energía's performance over time and in comparison with other companies in the sector. Consistency in the presentation of data compared to previous years is prioritised, and internationally recognised frameworks and standards are used, making it easier to understand progress and challenges in a broader context.
- **Verifiability:** ACCIONA Energía ensures that all information presented can be reviewed and verified by third parties. This includes the implementation of rigorous internal controls and the validation of data by an independent verifier, who confirms the reliability and consistency of the report. This external review process not only ensures the quality of the data, but also strengthens users' confidence in the information reported.
- **Understandability:** The Report has been prepared so that its contents are clear and accessible to anyone interested in ACCIONA Energía's performance. The use of overly technical terms is avoided and priority is given to an orderly structure that allows the key points to be easily understood. In addition, links have been established between financial and sustainability information, providing a comprehensive view of the company's impact and performance.

The information presented by the company has undergone an external review to check the reliability of the data and the consistency of the information presented. As a result of the verification process, this Report contains an Independent Review Report detailing the objective and scope of the review, the procedures used and the conclusions reached.

This Report also describes the company's annual progress in implementing the United Nations Global Compact's Ten Principles on human rights and labour rights, the environment, anti-corruption, and ACCIONA Energía's contribution to achieving the Sustainable Development Goals (SDGs) at local level.

The information published in this document is supplemented by other company reports: the Consolidated Financial Statements and Directors' Report, the Annual Corporate Governance Report and the Activity Report. The sustainability content is updated regularly on ACCIONA Energía's website: <https://www.accion-energy.com/>

[BP-2] INFORMATION ON SPECIFIC CIRCUMSTANCES

Timelines

The following timelines have been defined for the preparation of the Sustainability Report, in line with the organisation's Financial Statements:

- **Short term:** This is the reporting period defined in the consolidated financial statements. This time frame corresponds to assessments and plans for adaptation to immediate changes in the environment.
- **Medium term:** It covers a timeline of less than five years and corresponds to the timeline of each of the company's Sustainability Master Plans. This time frame provides a structured vision that allows strategies to be reviewed and adjusted as progress is made towards long-term goals.
- **Long term:** It covers a period of more than five years, which enables the observation of mega trends and the maintenance of a global and ambitious vision, essential to position oneself in the market and achieve high impact goals.

Metrics that include upstream or downstream data estimated using indirect sources, such as average sectoral data or other proxy variables

Metric	Basis for preparation	Resulting degree of accuracy	Actions planned to improve accuracy in the future
Scope 1, 2 and 3 emissions and non-GHG emissions	Emission factors based on non-specific sectoral averages to the extent that they correspond to the exact batch of the particular energy source used at each point of consumption.	High	Degree of accuracy considered sufficient
Quantity of substance of concern acquired	Quantities of substances identified as components of the resources purchased by the company based on generic product data sheets	High	Degree of accuracy considered sufficient

Sources of estimation and uncertainty of the result

Metric	Source of uncertainty	Measurement assumptions
Average supplier payment period	Availability of information limited to Spain	Assumption of value for Spain

Changes in the preparation or presentation of sustainability information

There are no material changes in the preparation or presentation of information.

Information on prior period errors

In the table of dismissals by age range, the data for 2023 is corrected for the 31-50 and >50 years age ranges. They had been presented in the wrong cells of the table.

Information derived from other legislation or generally accepted pronouncements on sustainability information

ACCIONA Energía prepares its Sustainability Report in accordance with the Corporate Sustainability

Reporting Standards (ESRS). In addition, the structure and recommendations of the following reporting frameworks have been adopted:

- Task Force on Climate-Related Financial Disclosures (TCFD), now integrated into the IFRS framework and detailed in chapter E1
- Transition Plan Taskforce (TPT) detailed in chapter E1
- Taskforce on Nature-related Financial Disclosures (TNFD) detailed in chapter E4
- Global Reporting Initiative (GRI): detailed in the “Responsible Taxation” chapter

Incorporation by reference

In certain sections of this report, ACCIONA Energía has adopted the “Incorporation by reference” methodology established in the ESRS, to improve the clarity and narrative flow of the report. In certain chapters, adjustments have been made to the order of the table of contents proposed by the CSRD. The full list of disclosure requirements, together with their exact location in the report, is presented in Annex II.

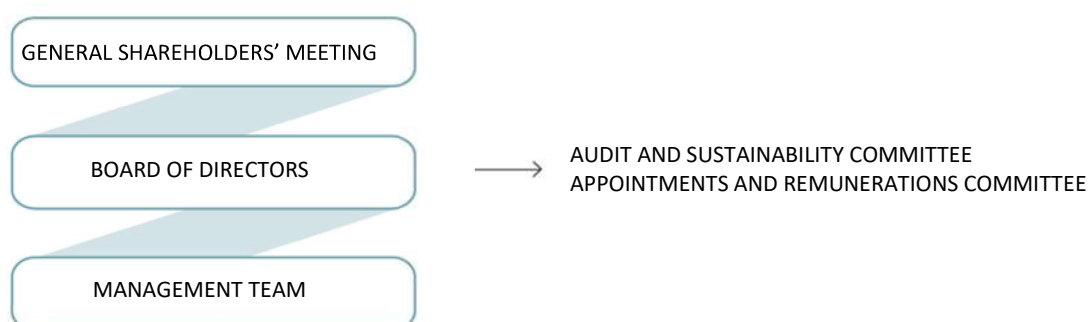
GOVERNANCE

[GOV-1] THE ROLE OF THE ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES

ACCIONA Energía has new governance bodies created in 2021 when it started trading on the stock market. The Board of Directors and its Committees are firmly committed to promoting good governance and social and environmental sustainability, ensuring creation of value for all of its stakeholders.

The organisation is governed by the recommendations set out in the Good Governance Code of Listed Companies of the Spanish National Securities Market Commission (CNMV), and also the best national and international practices on this subject.

ACCIONA ENERGÍA'S GOVERNANCE STRUCTURE



Audit and Sustainability Committee:

In relation to the consideration of environmental, social and governance issues covered in this Sustainability Report, the Audit and Sustainability Committee has the primary role of serving as an instrument and support to the Board of Directors in the oversight of accounting, financial and non-financial reporting (including Impacts, Risks and Opportunities in this area), good practices in corporate social responsibility sustainability in environmental and social matters, internal and external audit services and risk management. To perform its duties, the Committee has the following responsibilities:

- Periodically review and monitor the effectiveness of the internal control and financial and non-financial risk management systems relating to the company and its group, including operational, technological, legal, social, environmental, political and reputational or corruption-related risks, so that the main risks are properly identified, quantified, managed and disclosed.
- Establish and monitor a mechanism to enable employees and other persons connected with the company, such as directors, shareholders, suppliers, contractors or subcontractors, to report any wrongdoing.
- Oversee that the risk control and management policy includes the financial and non-financial risks (operational, technological, legal, social, environmental, political and reputational, including those related to corruption, among others) faced by the company.
- Have a risk control and management model in place, defining the level of risk that ACCIONA Energía considers acceptable, the measures to mitigate the impact of these risks, and the information and internal control systems to be used to control and manage the aforementioned

risks. To this end, under the direct supervision of the Audit and Sustainability Committee, there is a risk management and control function in the company.

- Supervise the internal audit function, which ensures the proper functioning of the internal control and information systems, and approve and supervise the annual work plan, ensuring that its activity is focused on the relevant risks, receiving an activity report and action plan at the end of the year.
- Oversee and evaluate the process of preparing financial and non-financial information, its integrity and the presentation of this information to the market.
- Oversee compliance with sustainability policies and rules on environmental, social and corporate governance, and with internal codes and codes of business conduct:
 - i. Identifying, guiding and periodically evaluating the company's policies, commitments, objectives, strategy and good practices so that they accomplish its mission to promote the social interest and take into account the legitimate interests of other stakeholders.
 - ii. Overseeing that practices are in line with the established strategy and policies, ensuring that the corporate culture is aligned with its purpose and values.

For more information on Management's role in relation to the governance processes, controls and procedures used to control, manage and monitor impacts, risks and opportunities and how the administrative, supervisory and management bodies and senior executive management oversee the setting of related targets and progress towards their achievement, see section [GOV-2] Governance and Sustainability Management.

Appointments and Remuneration Committee:

Regarding the consideration of environmental, social and governance issues addressed in this Sustainability Report, the Committee has the following responsibilities:

In relation to ACCIONA Energía directors and executives:

- Prepare and review the criteria to be followed for the composition of the Board of Directors and the management team, proposing a policy for the composition of the Board and verifying compliance with it annually in the annual corporate governance report.
- Assess the skills, knowledge and experience of the Board of Directors, drawing up a matrix with the required competencies, updating it periodically in accordance with the challenges and opportunities faced by the company in the short, medium and long term, define the functions and skills required of the candidates to fill each vacancy and assess the time and dedication necessary for them to perform their duties effectively.
- Submit to the Board of Directors proposals for the appointment of independent directors and report on proposals for the appointment of the remaining directors, as well as their re-election or removal. Likewise, report on the appointments and removals of senior executives proposed to the Board by the chief executive.
- Ensure that selection procedures are not affected by implicit bias, as well as set a representation target for the under-represented gender on the Board of Directors and encourage the incorporation of female senior managers.

- Propose to the Board of Directors the basic conditions of the contracts of the management team, as well as verify their observance by the company.
- Periodically review the remuneration policy for directors and executives, including share-based remuneration systems and their application, assessing their appropriateness and performance.
- Verify information on remuneration of directors and executives, including the annual and half-yearly financial reports, the annual corporate governance report and the annual directors' remuneration report.
- Submit its report on the annual evaluation of the functioning of the Board of Directors.
- Verify the independence of the external consultant in charge of the annual evaluation of the Board of Directors and its Committees and ensure the independence of any other external advice given to the Committee on matters within its competence.

+ More information: [Board and committees.](#)

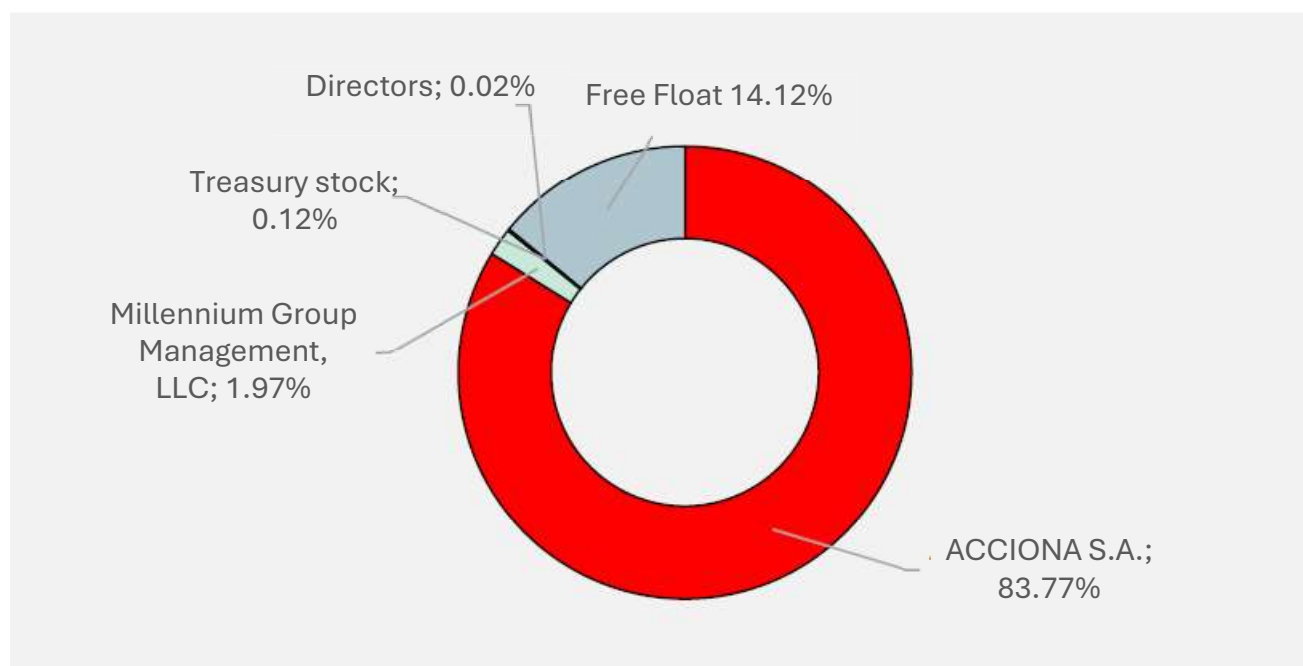
SHAREHOLDERS AND THE GENERAL SHAREHOLDERS' MEETING

At the time of preparing this report, the share capital of the company was represented by 324,761,830 ordinary shares registered by book-entry securities, each with a par value of 1 euro, fully subscribed and paid up.

In July 2021, and as a result of the Initial Public Offering (IPO), procedure carried out by ACCIONA S.A., shares of ACCIONA Energía representing 17.25 % of the company's share capital were admitted for listing on the stock exchanges of Madrid, Barcelona, Bilbao and Valencia.

+ More information: [Initial Public Offering.](#)

Shareholdings on the date of this report



The company's Articles of Association do not contain any restrictions or a maximum limit on shareholders' voting rights.

Under the terms of the second recommendation of the Code of Good Governance for Listed Companies, ACCIONA and ACCIONA Energía have entered into a Framework Agreement for Relations which defines the scope of action of each one, the management of any conflicts of interest, the mechanisms for the settlement of any possible disagreements and the regulation of business opportunities, based on the principles of priority and protection of the interests of ACCIONA Energía's minority shareholders. The agreement also sets out the procedure for authorisation and processing any related transactions and the regulation of information flows between both sides.

On 28 August 2023, the Board of Directors approved a temporary programme for the repurchase of treasury shares (hereinafter the "Repurchase Programme"), notified to the CNMV as Privileged Information (PI) number 1965, which in turn entailed the temporary suspension of the Liquidity Agreement.

The purpose of this Programme was twofold: on the one hand, to reduce capital through the redemption of up to a maximum of 4,488,759 shares, representing approximately 1.36% of the share capital of the company, subject to a resolution of the General Shareholders' Meeting, and, on the other hand, to provide a pool of up to a maximum of 450,000 shares, representing approximately 0.14% of the share capital of the company, to meet the obligations that may arise from the Share Delivery Plans for executive directors, executives and employees of the Group.

On 27 February 2024, the company notified the CNMV that it had reached the maximum number of shares to be acquired under the Repurchase Programme, i.e., 4,938,759 shares, representing approximately 1.5% of the company's share capital. The termination of the Repurchase Programme also entailed the reactivation of the Liquidity Agreement, effective 28 February 2024.

Subsequently, on the occasion of the completion of the Repurchase Programme, the General Shareholders' Meeting held on 6 June 2024 approved, with 98.83% of votes in favour, the reduction of the company's share capital through the redemption of treasury shares, resulting in a share capital of €324,761,830.

General Shareholders' Meeting

Prior to holding the General Shareholders' Meeting (GSM), to guarantee and facilitate communications with all shareholders, including minority shareholders, pursuant to the terms of the Capital Companies Act, ACCIONA Energía has an electronic shareholders' forum. Here shareholders can put forward motions they wish to add to the agenda announced in the call notice of the Annual General Meeting, applications to support said motions, initiatives aimed at achieving a sufficient percentage to exercise a minority right provided for by law, and offers and requests for voluntary representation. ACCIONA Energía also establishes permanent channels of communication with its shareholders and investors through its Investor Relations department.

In addition, when the formal call for the General Shareholders' Meeting is sent out, and through its web site, ACCIONA Energía makes a system available to shareholders for remote electronic or mail-in voting in order to facilitate the exercising of voting rights. The AGM held in 2024 was a face-to-face meeting with online participation, thus permitting shareholders or their proxies to participate and follow the Meeting, to ask questions or speak, and exercise their voting rights on the different items appearing on the agenda.

At the General Shareholders' Meeting held on 6 June 2024 in first call, various issues were discussed, amongst which the following:

- Approval of the annual accounts and directors reports.
- Approval of the payment of a dividend for a gross amount of €0.48 per share
- Re-election of the company's auditors and its consolidated group for 2024.
- Reduction of the company's share capital through the redemption of 4,488,759 treasury shares, representing approximately 1.36% of the current share capital of Corporación Acciona Energías Renovables, S.A.
- Approval of the Statement of Non-financial Information and the Sustainability Report for 2023.

All resolutions were approved with the vote in favour of at least 90.03% of the voting capital in attendance at the AGM.

Board of Directors

The Board of Directors is the body responsible for directing, managing and representing the Company with full powers, notwithstanding the attributions corresponding to the Shareholders General Meeting. It is made up of a group of professionals with diversity of knowledge, origins, experiences, nationalities and gender, whose aim is to provide real value to the company, working every day with integrity and transparency in the most efficient and effective way.

The Board of Directors' objective is to perform its functions with unity of purpose and independence of judgement, affording all

shareholders the same treatment in the same situation and to be guided by company interests, understood as achieving a profitable and sustainable business in the long term which promotes its continuity and maximizing the economic value of the company in benefit of the shareholders, seeking to reconcile it with the legitimate interests of its employees, suppliers, customers and other stakeholders.

In accordance with the Articles of Association, the Board members will remain in office for two years and may be re-elected once or several times.



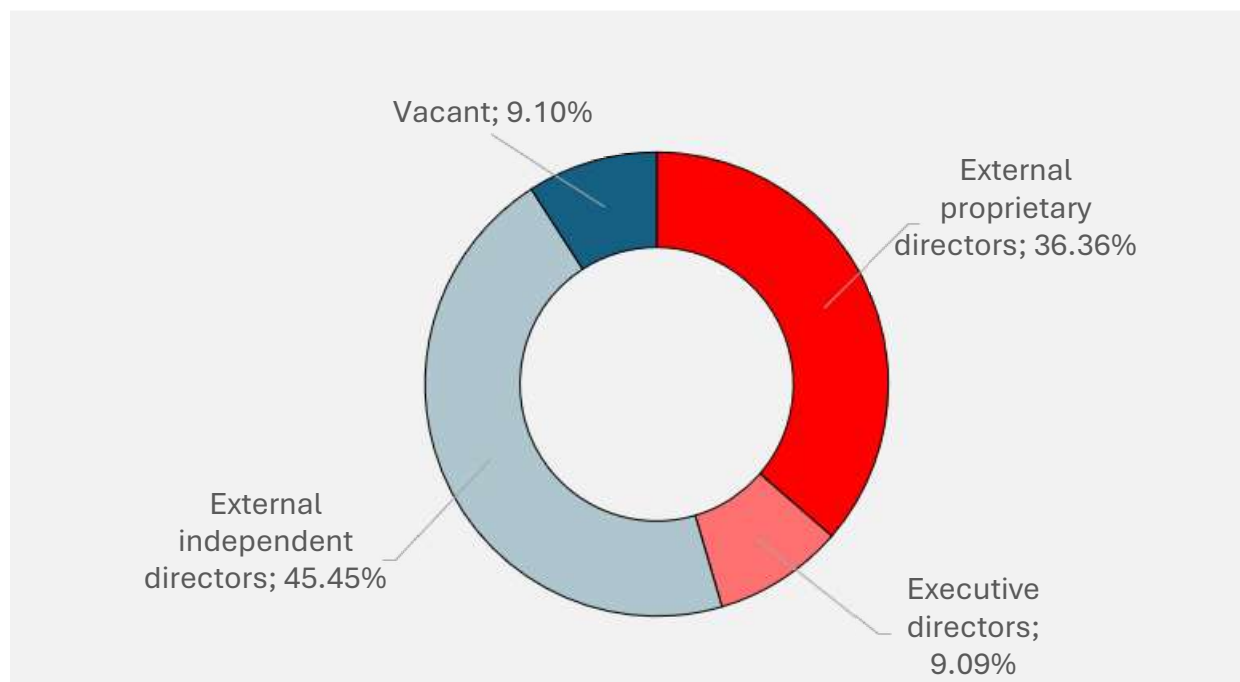
At ACCIONA Energía, the Board of Directors does not include employee representation. However, it is informed, through a variety of sources, of issues of particular relevance to employees and other workers and takes them into account in its strategic and operational decision-making processes, thus ensuring that their perspectives are considered in business objectives.

ACCIONA Energía has a Board of Directors' Composition Policy¹ that aims for greater gender parity in its administrative body. In this regard, bearing in mind the vacancy that arose on the Board of Directors, the percentage of female directors on the Board of Directors was 36.36% by the end of 2024.

The Board of Directors of ACCIONA Energía is composed of eleven members:

- Five are independent directors (2 women and 3 men).
- Four are proprietary directors (2 women and 2 men).
- One is an executive director.
- There is currently one vacancy on the Board of Directors.

¹ On 6 June 2024, Ms. Karen Christiana Figueres Olsen tendered her resignation as Independent Director, for personal reasons, by letter addressed to the Board of Directors. Ms. Figueres Olsen was also a member of the Appointments and Remuneration Committee. As a consequence of the above, a vacancy arose on the Board of Directors of the company and the percentage of women on the Board of Directors fell. At the time of this resignation, the proportion of female directors out of the total number of Board members was 45.45%. Notwithstanding the foregoing, the company's Appointments and Remuneration Committee is actively working to find a suitable candidate to fill the vacancy on the Board, in accordance with the applicable regulations and in line with the company's Board Composition Policy.

DISTRIBUTION OF THE BOARD OF DIRECTORS BY TYPE OF POSITION AS AT 31 DECEMBER 2024

MEMBER	PROFILE	1ST APPOINTMENT (YEAR)	COMMITTEES OF THE BOARD OF DIRECTORS TO WHICH HE/SHE BELONGS
Mr José Manuel Entrecanales Domecq	Chairman and Proprietary Director	2021	
Mr Rafael Mateo Alcalá	Executive Director	2021	
Mr Juan Ignacio Entrecanales Franco	Proprietary Director	2021	
Ms Sonia Dulá	Proprietary Director	2021	Audit and Sustainability Committee (member)
Mr Juan Luis López Cardenete	Independent Director	2021	Appointments and Remunerations Committee (chairman)
Mr Alejandro Mariano Werner Wainfeld	Independent Director	2021	Audit and Sustainability Committee (member)
Ms María Salgado Madriñán	Proprietary Director	2021	Appointments and Remunerations Committee (member)
Mr Rosauro Varo Rodríguez	Independent Director	2021	Appointments and Remunerations Committee (member)
Ms María Fanjul Suárez	Independent Director	2021	Audit and Sustainability Committee (chairperson)

Ms Teresa Quirós Álvarez	Independent Director	2023	Audit and Sustainability Committee (member)
Vacancy			
Jorge Vega-Penichet López	Non-director Secretary	2021	Secretary of the Audit and Sustainability Committee and the Appointments and Remuneration Committee

The assessment of the performance of the functions and office of each director, the Chairman and the committee chair people will be conducted every year on the basis of the report made by the Appointments and Remunerations Committee. The assessment of the functioning of the Committees and their officers will be made on the basis of the report made by each Committee to that end. This evaluation includes the performance and contribution of each board member and the diversity in composition and competencies.

The evaluation is carried out by means of individual forms that are completed anonymously by each director. Once filled out, the Audit and Sustainability Committee and the Appointments and Remunerations Committee analyse the results and refer the corresponding reports and proposals to the Board of Directors. The Board determines any areas for improvement and supervises any changes that will be introduced. This assessment can be carried out the help of an external consultant.

In accordance with corporate governance regulations and best practices, every 3 years, the Board is assisted by an independent external party to carry out the evaluation. In the 2023 financial year, this evaluation was carried out with the help of the firm Deloitte Legal, which, through questionnaires and individual interviews with each Director, in which their competencies were reviewed in detail, after analysing internal documentation, minutes, progress in the action plans designed by the Board of Directors, etc., presented its conclusions to the Appointments and Remuneration Committee and the Board of Directors and accompanied them in the design of the Action and Improvement Plan resulting from this evaluation.

In addition to this evaluation, which includes a review of competencies, a review of the competencies matrix is periodically carried out by the directors and, on the occasion of each proposed change in the composition of the Board of Directors (either by re-election or new appointment), an analysis is made of the skills, knowledge and experience that need to be incorporated into the Board of Directors in order to adequately define the profile of the candidate.

The Committee will assess each candidate regardless of the category to be assigned the prospective board member and person who has proposed him or her.

COMPETENCY MATRIX OF ACCIONA ENERGÍA BOARD

				Energy and climate change	Board experience	Financial administration	Banking experience	Geopolitical exposure	Digital experience	Science and technology	Social issues	Risk management	Cybersecurity	Talent management, human resources and remuneration experience
1	Mr José Manuel Entrecanales Domecq	Chairman	Proprietary	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	No	Yes
2	Mr Rafael Mateo Alcalá	CEO	Executive	Yes	Yes	Yes	No	Yes	No	No	Yes	No	No	Yes
3	Mr Juan Ignacio Entrecanales Franco	Member	Proprietary	Yes	Yes	Yes	No	No	No	No	Yes	No	No	Yes
4	Ms Sonia Dulá	Member	Proprietary	No	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes
5	Mr Alejandro Mariano Werner Wainfeld	Member	Independent	Yes	No	Yes	Yes	Yes	No	No	Yes	No	No	Yes
6	Ms María Fanjul Suárez	Member	Independent	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
7	Mr Rosaura Varo Rodríguez	Member	Independent	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes
8	Ms María Salgado Madriñán	Member	Proprietary	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes
9	Mr Juan Luis López Cardenete	Member	Independent	Yes	Yes	Yes	No	Yes	No	Yes	No	Yes	No	Yes
10	Ms Teresa Quirós Álvarez	Member	Independent	Yes	Yes	Yes	No	No	No	No	Yes	Yes	Yes	Yes
11	Vacancy													

The majority of the members of the Board of Directors have general experience in sustainability, considering as such their background and expertise in the following areas, related to the Impacts, Risks and Opportunities outlined in this chapter: “Energy and Climate Change”, “Risk Management”, “Social Issues” and “Talent Management, Human Resources and Remuneration”. If the Board of Directors (or any of its members) identifies a matter on which they believe it would be appropriate to receive specific training, they may propose it in order to strengthen their competencies in that area.

ATTENDANCE AND MEETINGS OF THE BOARD OF DIRECTORS AND COMMITTEES IN 2024

	BOARD OF DIRECTORS	AUDIT AND SUSTAINABILITY COMMITTEE	APPOINTMENTS AND REMUNERATIONS COMMITTEE
Quorum	93.93 %	100%	95 %
No. meetings	12	10	5

In order to respond to current needs, the Board of Directors has a “Director’s Portal” that allows members to access the information, sufficiently in advance for each meeting, and encourages communication between Directors and the Secretary, while at all times guaranteeing confidentiality, in addition to being able to hold virtual meetings in a safe and accessible environment.

MANAGEMENT TEAM

The Management Team is composed of 11 professionals in Spain and abroad, from different departments and specialisations. The company has notified the CNMV of any members of management who hold offices with managerial responsibilities for the purposes of the provisions of Regulation (EU) no. 596/2014, on market abuse. The percentage of women in the senior management team is 45.45%.

This management team is the link between the Board of Directors and the rest of the company, being the body with maximum responsibility for the development and execution of the strategies that respond to the guidelines set by the Board (including those related to sustainability issues). In particular, the Chief Financial and Sustainability Officer of ACCIONA Energía has responsibilities and knowledge in this area.

+ More information: [Management Team of ACCIONA Energía](#).

[GOV-2] INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

ACCIONA Energía has a governance model designed to integrate risk management, opportunities and material impacts into decision-making.

Sustainability governance

The Audit and Sustainability Committee is the body that helps the Board members supervise accounting, financial and non-financial information², the best practices in sustainability, internal and external audit services and risk management.

The Committee meets, depending on its needs, at least four times a year. The Committee usually has an item on the agenda dealing with sustainability issues. The Economic-Financial Division, either directly through the Chief Financial and Sustainability Officer (CFSO) or the Sustainability Director, reports to the Committee on material impacts, risks and opportunities, on the implementation of due diligence in the company and on the results and effectiveness of the policies, actions, metrics and targets adopted to address them.

Functions of the Audit and Sustainability Committee in terms of ESG³

- Regularly review the effectiveness of the internal control and non-financial risk management systems.
- Supervise and evaluate the preparation process, integrity and market presentation of the mandatory financial and non-financial information, both annual and interim, checking compliance with regulatory requirements, the appropriate delimitation of the consolidation perimeter and the proper application of accounting criteria, as well as raise its reports to the Board of Directors.
- Identify and guide the sustainability policies, rules, commitments, objectives, strategy and best practices. Ensure that the organisation's procedures on environmental and social matters have the minimum content stipulated in the Good Governance Code of Listed Companies.
- Identify and guide the policies and rules on corporate governance before they are submitted to the Board of Directors. Oversee compliance with the policies and standards and the internal rules of conduct applicable to the company and its group, ensuring at the same time that the corporate culture is in line with its purpose and values.

² Including impacts, risks and opportunities in this area.

³ Full explanation of the functions, powers and members of the Audit and Sustainability Committee available on the website: functions, powers and members of the Audit and Sustainability Committee

The main Environment, Social and Governance (ESG) matters discussed at the 2024 meetings were:

- Monitoring of progress in the implementation and certification of the AENOR-certified ISO information security management system (obtaining ISO 27001/2022 certification).
- Review of the structure of the Cybersecurity controls and appendices (technological, organisational, HR, physical controls, etc.) and the design of the Strategy for the 2025 financial year.
- Review of the process of drafting, approval and inclusion in the ACCIONA Energía Policy Book of the policies on: Water, Biodiversity, Climate Change, Human Rights, Circular Economy, Environment and Stakeholder Relations.
- Monitoring of progress in achieving the objective of the Sustainability Master Plan 2025, with particular emphasis on the issues associated with IROs in the area of:
 - Women in management or executive positions
 - Staff with disabilities
 - Accident frequency rate
 - Fatalities
 - Total, strategic, and no-go suppliers
 - Third party due diligence process
 - Projects with social impact management
 - Progress on decarbonisation strategy
 - ESG risk, opportunity and impact assessment
 - Alignment with the EU taxonomy for sustainable activities
 - Voluntary planting programme
 - Greenhouse Gas Emissions and Decarbonisation Plan
 - Circularity in waste management and resource consumption
 - Water consumption trends
 - Sustainable financing
- Sustainability 2024 reporting calendar and key ESG rating agency assessment results.

The Non-financial Information Statement is checked and put to the vote at the Annual General Meeting (AGM) as required in Spanish Law 11/2018. Shareholders have the opportunity to express their opinion on the initiatives and performance described above. In 2024, the AGM approved the 2023 report with the votes in favour of 99.99% of the share capital in attendance.

[GOV-3] INTEGRATING SUSTAINABILITY-RELATED OUTCOMES INTO INCENTIVE SCHEMES

Remunerations Policy

The directors' remunerations policy for the years 2024 to 2026 was approved as a separate point on the agenda of 1 June 2023 and its main lines are included in the Annual Report on Directors' Remunerations approved by ACCIONA Energía in 2023. Article 529 of the Capital Companies Act and Article 29 of ACCIONA Energía's Articles of Association set out the obligation of approving the system for directors' remunerations at least every three years, as a separate point on the Agenda of the Shareholders General Meeting.

The company's remunerations policy, including the one for members of the Board of Directors who exercise executive functions, is governed by the following principles:

- Consistency with the business strategy.
- Corporate governance and transparency.
- Balanced design.
- Internal equality.
- Alignment with market practice.
- Linked to employees' conditions

+ More information: [Directors' Remuneration Policy.](#)

In addition to the above, the company has in place a long-term incentive plan linked to the growth and sustainability objectives established in the Business Plan for the period 2021-2025, called the "2021 Plan for performance shares and delivery of shares to the Executive Directors of Corporación Acciona Energías Renovables, S.A." or "2021 Plan", approved by the Extraordinary General Shareholders' Meeting of Corporación Acciona Energías Renovables, S.A. at its meeting of 26 May 2021, in the context of its IPO.

Subject to certain conditions, 80% of the Shares will be delivered in 2026 following the Annual General Meeting in that year and the remaining 20% of the Shares will be delivered on a deferred basis in 2027 following the Annual General Meeting in that year and at least one year after the date on which the initial 80% of the Shares were delivered.

The Annual Report on Directors' Remuneration, approved by the Board of Directors, which includes the information on the practical application of the Remuneration Policy for its members and details the compensation received by each individual director.

The average total remuneration for non-executive directors was in 2024 €164,700 for men (€162,700 in 2023) and €150,000 for women (€140,600 in 2023). The average total remuneration for executives who were not executive directors was in 2024 €171,000 for men (156,000 in 2023) and €165,000 for women (159,000 in 2023).

[GOV 4] PROCESSES FOR ENVIRONMENTAL AND HUMAN RIGHTS DUE DILIGENCE

ACCIONA Energía recognises the responsibility to promote and protect the environment and human rights and understands the importance of operating responsibly throughout the value chain. Responsibility for environmental and human rights risk management and compliance rests with the Board of Directors, which, through the Code of Conduct, Environmental and Human Rights Policies, and the integration of a Due Diligence strategy, drives the identification, prevention, mitigation and accountability of relevant risks and opportunities in these areas.

Regulatory framework and governance

ACCIONA Energía's regulatory framework for the promotion and protection of the environment and human rights is ensured through its governance and sustainability model, the integration of due diligence systems in these areas and the three lines of defence control model.

In line with the Sustainable Development Goals (SDGs), the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, ACCIONA Energía bases its commitment to respect and protect the environment and human rights on the International Bill of Human Rights and the International Labour Organization (ILO) Conventions on fundamental rights at work and international agreements on environmental protection. These regulatory frameworks are fundamental to the management of environmental and human rights due diligence and reflect an approach based on responsibility and respect that permeates throughout ACCIONA Energía's operations and value chain.

Vision

ACCIONA Energía's Code of Conduct, available to all employees and business partners, ensures that every person and entity that interacts with the company is committed to responsible practices. The principles of action and ethics of the Code of Conduct reflect ACCIONA Energía's commitment to respect for human rights and the environment, and highlight critical areas such as the prohibition of child labour, forced labour and discrimination, as well as the commitment to the fight against climate change, the promotion of energy saving, the rational use and management of water, the responsible use of resources, the effective management of waste, pollution prevention and the protection of the natural environment and biodiversity.

This Code, linked to ACCIONA Energía's Sustainability Policies, acts as a guide for the implementation of comprehensive environmental and human rights due diligence in all regions and contexts where the company operates. The scope of application of the Code covers not only the company and its subsidiaries, but also its contractors and suppliers worldwide. This extension ensures that environmental sustainability and human rights practices are aligned and integrated into work systems and recruitment policies.

The company's commitment is reflected in its policies. In this regard, the following due diligence mechanisms and phases are established in the Environmental and Human Rights Policies:

- Risk and impact identification and assessment: ACCIONA Energía regularly identifies and assesses actual and potential adverse effects associated with its business activities and business relationships. This process covers the timelines: short, medium and long term.
- Detection mechanisms: ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework

of ACCIONA Energía's activities. The Ethics Channel is the instrument that the organisation makes available to employees, suppliers, customers and collaborators to report any wrongdoing. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically.

- **Mitigation of adverse effects:** ACCIONA Energía integrates the results of the assessments of adverse effects in the management and internal control systems, in order to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through prevention, mitigation and remediation measures and control activities, aligned with national and international frameworks.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on the environment and human rights, ensuring a focus on continuous improvement in its practices.
- **Accountability:** ACCIONA Energía publicly discloses the assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the negative environmental and human rights consequences of its activities. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.
- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse environmental and human rights impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

The following summary table includes cross-references to other sections of this Sustainability Report where you can find a description of the implementation of the elements of diligence in the company's operations and the requirements extended to its value chain:

ESSENTIAL ELEMENTS OF DUE DILIGENCE	SECTIONS OF THE SUSTAINABILITY REPORT
a) Integrating due diligence into governance, strategy and the business model	Sections GOV-1; GOV-2; GOV-3; GOV-5, SBM-1,3; E1-1; E4-1; G1-1
b) Engaging with affected stakeholders at all key stages of due diligence	Sections GOV-2; SBM-2; IRO-1; E1-2; E2-1; E3-1; E4-2; E5-1; S1-1,2, S2-1,2; S3-1,2; S4-1,2; G1-1,2
c) Identification and assessment of adverse events	Sections GOV-5; IRO-1; SBM-3; E1-9; E2-6; E3-5; E4-6; E5-6; G1-3.
d) Taking measures to deal with such adverse events	Sections E1-3; E2-2; E3-2; E4-3; E5-2; S1-2,3,4; S2-2,3,4; S3-2,3,4; S4-2,3,4; G1-3.
e) Monitoring the effectiveness of these efforts and communication	Sections E1-4,5,6,7,8; E2-3,4,5; E3-3,4; E4-4,5; E5-3,4,5; S1-5,6,7,8,9,10,11,12,13,14,15,16,17; S2-5;

Below is a detailed description of ACCIONA Energía's Environmental and Human Rights Policies:

ENVIRONMENTAL POLICY

PURPOSE

ACCIONA Energía's Environmental Policy establishes the framework for managing the strategy of protecting, preserving and improving the environment. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to ecosystems and their components.

ACCIONA Energía considers it essential to comply with current environmental legislation in all the countries where it operates, minimising its environmental footprint by integrating environmental criteria from the early stages of planning and design of its projects, promoting economic growth that respects the limits of the planet.

In this context, ACCIONA Energía's Environmental Policy is aligned with the main international agreements and conventions on the environment, contributing to the commitments of the Paris Agreement, the Convention on Biological Diversity, the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

ACCIONA Energía's Environmental Policy develops the principles and due diligence framework applied by the company in general environmental matters. Based on the contents of this Environmental Policy, specific thematic policies on Water, Biodiversity, Climate Change and Circular Economy are developed which, building on these general bases, define the specific principles and commitments applicable to these particular aspects.

SCOPE

This policy applies to all companies in which ACCIONA ENERGÍA holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to all employees, suppliers, contractors and collaborators.

PRINCIPLES



ACCIONA Energía's Environmental Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.⁴
- **Damage prevention:** ACCIONA Energía undertakes to prevent and reverse the adverse effects caused by pollution or overexploitation of natural resources, among others, from its operations, even in locations where there is no regulatory framework in this regard. Harm prevention focuses on:
 - **Land protection:** ACCIONA Energía is committed to responsible land management and use. It promotes the proper management of derived resources and waste that may impact it, with the aim of preventing its pollution and preserving its essential ecological functions.
 - **Water protection:** ACCIONA Energía develops solutions that improve the quality, quantity and availability of water, implementing the necessary measures to prevent any form of pollution and ensure the sustainability of this resource.
 - **Air protection:** ACCIONA Energía promotes the improvement of air quality and the reduction of greenhouse gas emissions, noise and light disturbances, and other types of pollutants released into the air, encouraging the use of clean energy and applying measures to mitigate their impact on the environment.
- **Positive impact:** ACCIONA Energía promotes an approach beyond the mitigation of negative impacts, aware of the progressive deterioration of the planet. This approach integrates the entire life cycle of the project, from design to end-of-life, with the aim of generating a positive impact that we call regenerative.
- **Training:** ACCIONA Energía promotes environmental protection both within the organisation and in its value chain, offering training in this area to employees, suppliers and contractors, in order to extend its commitment to its stakeholders.
- **Partnerships with stakeholders:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies, social organisations and other stakeholders, integrating multiple perspectives in its efforts to protect the environment and promote sustainable solutions.

DUE DILIGENCE

ACCIONA Energía implements the due diligence process in its operations structured in six stages defined in the Guide to Responsible Business Conduct⁵. This process complies with international environmental frameworks, such as the Convention on Biological Diversity, the Paris Agreement, the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are as follows:

- **Risk and impact identification and assessment:** ACCIONA Energía regularly identifies and assesses actual and potential adverse environmental impacts associated with its business activities and business relationships. This process covers the timelines: short, medium and long term.
- **Detection mechanisms:** ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework of ACCIONA Energía's activities. The Ethics Channel is the instrument that the organisation makes available to employees,

⁴ The Environmental Policy covers all pollutant releases and transfers included in Regulation (EC) No 166/2006 of the European Parliament and of the Council.

⁵ Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse human rights and environmental impacts; (3) prevent, interrupt or minimise actual and potential adverse human rights and environmental impacts; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remediate.

suppliers, customers and collaborators to report any wrongdoing. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically.

- **Mitigation of adverse effects:** ACCIONA Energía integrates the results of the assessments of adverse environmental effects in the management and internal control systems, in order to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through prevention, mitigation and remediation measures and control activities, aligned with national and international frameworks.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on the environment, ensuring a focus on continuous improvement in its practices.
- **Accountability:** ACCIONA Energía publicly discloses the assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the negative environmental consequences of its activities. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.
- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse environmental impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The **Environmental Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

HUMAN RIGHTS POLICY

PURPOSE

ACCIONA Energía's Human Rights Policy establishes the framework for the protection and promotion of human rights and fundamental freedoms in all of the organisation's activities. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of human rights risks, impacts and opportunities throughout the value chain.

ACCIONA Energía considers it a priority to contribute to the protection of human rights, aligning itself with global efforts to prevent any kind of direct or indirect violation of these rights. The organisation is committed not to cause, contribute to causing or be associated with human rights violations, promoting an environment respectful of human rights in its staff, value chain, local communities and society at large.

ACCIONA Energía's Human Rights Policy is aligned with the principles and objectives of the main international agreements and conventions, such as the International Bill of Human Rights, i.e., the set of documents formed by the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its 8 core conventions; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the UN Convention on the Rights of the Child; the UN Global Compact; and the Seoul Declaration on Safety and Health at Work. ACCIONA Energía is aligned with and committed to complying with the UN Guiding Principles on Business and Human Rights and contributing to the Sustainable Development Goals (SDGs).

SCOPE

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

PRINCIPLES

ACCIONA Energía's Human Rights Policy is based on the following principles:

- **Equal treatment and opportunities:** ACCIONA Energía promotes a culture of respect and inclusion, prohibiting discrimination on the grounds of age, race, ethnicity, colour, gender, disability, religion, political opinion, national extraction, social origin, sexual orientation, marital status, education, background or any other condition, in line with the Discrimination (Employment and Occupation) Convention, 1958. All employees must receive fair and equitable treatment, with equal opportunities. In addition, the organisation prohibits and prevents all forms of physical, psychological, moral and/or

sexual discrimination and harassment, in accordance with the ILO Violence and Harassment Convention, 2019.

- **Freedom of employment, prohibition of forced labour and all forms of modern slavery:** ACCIONA Energía recognises the right to freely chosen work and prohibits forced labour, all forms of modern slavery and human trafficking in accordance with the Forced Labour Convention, 1930 and the Abolition of Forced Labour Convention, 1957. It prohibits any kind of work under threat and ensures that workers do not pay undue fees or costs. It respects the freedom of movement of workers, prohibiting the retention of identity documents, and requires employment agencies to comply with these principles. ACCIONA Energía also undertakes to maintain a work environment free of exploitation and not to employ any person under 18 years of age, strictly prohibiting child labour in accordance with the Minimum Age Convention, 1973 and the Worst Forms of Child Labour Convention, 1999.
- **Freedom of association, unionisation and collective bargaining:** ACCIONA Energía respects and promotes freedom of association, unionisation and the effective recognition of the right to collective bargaining in accordance with the Freedom of Association and Protection of the Right to Organise Convention, 1948; the Right to Organise and Collective Bargaining Convention, 1949; and the Collective Bargaining Convention, 1981. Employees have the right to associate and participate in organisations for the defence of their interests. The organisation does not interfere in workers' elections and guarantees protection against any discriminatory acts that undermine freedom of association. ACCIONA Energía also supports collective bargaining to define working conditions and regulate relations with trade unions.
- **Safe and healthy working conditions:** ACCIONA Energía promotes a decent, safe and healthy working environment, based on a health and safety management system in accordance with the highest international standards and industry best practices, in line with the Occupational Safety and Health Convention, 1981 and the Promotional Framework for Occupational Safety and Health Convention, 2006. The organisation promotes a culture of occupational risk prevention as a fundamental pillar to guarantee the health and safety of its employees. Where housing facilities are provided for employees, ACCIONA Energía ensures that housing conditions are adequate and decent, complying with applicable national and international standards.
- **Ethical, fair and equitable working and recruiting conditions:** ACCIONA Energía implements recruitment practices that are ethical, fair and equitable, ensuring that employment conditions are based on homogeneous criteria for all groups, with equal opportunities and recognition of professional merit. The organisation fosters the inclusion of people at risk of social exclusion and people with disabilities, promoting their integration into the labour market. ACCIONA Energía provides decent working conditions that meet the basic needs of employees and their families and promotes equal pay for work of equal value. All working conditions are clearly set out in a written contract, in a language understandable to the worker, and comply with ILO Conventions and current legislation.
- **Privacy and communication:** ACCIONA Energía respects the confidentiality and the right to privacy of all persons with whom it interacts, and is committed to managing information and data in accordance with national and international data protection laws. In addition, the Organisation ensures that its corporate and commercial communications are non-discriminatory and respectful of different cultures, paying special attention to not adversely affect the most vulnerable groups.
- **Respect for the communities in which it operates:** ACCIONA Energía recognises that its commitment to human rights includes individuals and communities that may be affected by its activities, paying special attention to vulnerable groups such as indigenous peoples and minorities. The organisation respects the right of access to food, water, sanitation, energy, education, health, housing, a clean and healthy environment, as well as the rights to freedom of opinion, expression, thought and religion. ACCIONA Energía is committed to avoiding involuntary resettlement and, where this is not possible, to minimising the impact and providing fair compensation. It also respects the land

rights of communities and ensures that indigenous peoples can participate in decisions that affect them, in accordance with ILO Convention 169 and free, prior and informed consultation.

- **Positive contribution to communities:** ACCIONA Energía contributes to the economic, social and environmental development of the communities in which it operates, raising living standards by generating employment, providing access to basic services and protecting the environment. Through active listening and close cooperation with local communities, ACCIONA Energía contributes to the achievement of these objectives.
- **Training:** ACCIONA Energía encourages respect for human rights, both within the Organisation and in its operating communities and value chain, offering training in this area to employees, suppliers and contractors, in order to promote a culture of respect for and protection of human rights.
- **Partnerships with stakeholders:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies, social organisations and local communities, integrating multiple perspectives in its efforts to protect human rights.

DUE DILIGENCE

ACCIONA Energía implements the due diligence process in its operations structured in six stages defined in the Guide to Responsible Business Conduct⁶. This process complies with the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are as follows:

- **Risk and impact identification and assessment:** ACCIONA Energía regularly identifies and assesses actual and potential adverse human rights impacts associated with its business activities and business relationships. This process covers the timelines: short, medium and long term.
- **Detection mechanisms:** ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework of ACCIONA Energía's activities in the area of human rights. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically, in compliance with Principle 31 of the UN Guiding Principles on Business and Human Rights. The Ethics Channel is the instrument that ACCIONA Energía makes available to employees, suppliers, customers and collaborators to report any wrongdoing or violation related to human rights. In addition, the organisation establishes early warning mechanisms to address impacts urgently and minimise their magnitude, in collaboration with affected or potentially affected parties.
- **Mitigation of actual and potential adverse human rights impacts:** ACCIONA Energía establishes internal control systems to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through control activities aligned with the principles of responsible business conduct.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on human rights, ensuring a focus on continuous improvement its practices.
- **Accountability:** ACCIONA Energía publicly discloses assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the human rights implications of its activities. If serious violations are detected, the company undertakes to report them in a transparent

⁶ Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse human rights and environmental impacts; (3) prevent, interrupt or minimise actual and potential adverse human rights and environmental impacts; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remediate.

manner. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.

- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse human rights impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by changes in legislation, agreements or frameworks in this area.

The Human Rights Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

[GOV-5] SUSTAINABILITY RISK MANAGEMENT AND INTERNAL CONTROLS

Risk management is an integrated process in ACCIONA Energía's strategic management driven by the Board of Directors. Through this process, circumstances that could potentially have a financial impact on the company and its business are identified, assessed and managed. The process ensures proper treatment and control of the resulting risk scenarios, so that they can be contained within an acceptable tolerance threshold for the organisation.

The process of sustainability risk management is carried out on an ongoing basis. Each risk event (financial or economic, strategic, operational and unforeseeable) is assessed using criteria such as probability, economic-financial impact, reputational damage, impact on sustainability and development, the company's ability to handle it and risk management decided by the company.

The analysis is conducted from four perspectives: market, financial, emerging trends (including cybersecurity) and sustainability, also known as non-financial or ESG.

In addition to the Board of Directors, the bodies responsible for the different Risk Management Systems are the Audit and Sustainability Committee, the Economic-Financial and Sustainability Division, the Compliance Division and the Risk Division. The risk management function is, therefore, structurally independent of the different lines of business.

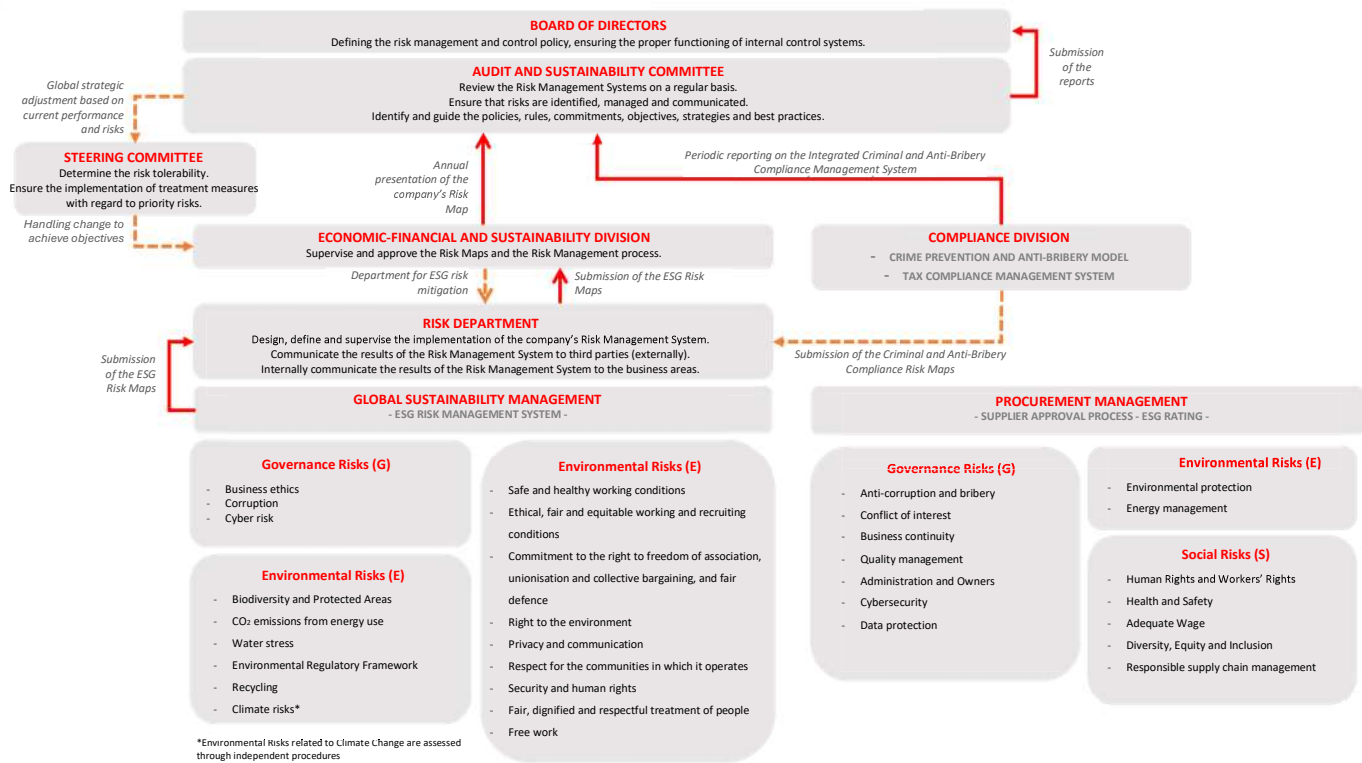
- The **Audit and Sustainability Committee** oversees the company's internal risk control, management and mitigation procedures. The necessary training in this area is also provided to directors - executive and non-executive - on an annual basis.

+ **More information:** [Report on the Audit and Sustainability Committee Activity](#)

- The **Steering Committee**, which is responsible for determining risk tolerance and ensuring that the suitable treatment measures are taken for the priority risks.
- The **Risk Division** takes care of designing, defining, directing, monitoring and communicating the implementation of the Risk Management System through the required team for this task. It is part of the Economic-Financial and Sustainability Division (belonging to the Steering Committee). It also provides the necessary information to identify and assess the risks affecting the company and implement measures to address priority risks, together with the corresponding areas.
- The **Sustainability Division** (which incorporated in its structure the Social and Environment functions) which is part of the Economic-Financial and Sustainability Division, is the executive body that supports the Risk Division for the identification and assessment of the risks related to sustainability.
- **The Purchasing Division** carries out a supplier approval and evaluation procedure that is part of the risk map. The ESG risks assessed in suppliers are interconnected with the ESG risks assessed in projects, providing a comprehensive approach to risks in both own operations and in the value chain. This information is then submitted to the Board of Directors.

GOVERNANCE FLOW OF NON-FINANCIAL RISKS

ESG Risk Governance at ACCIONA Energía and information flows



More information: [Risk Management System in the Corporate Governance Report.](#)

Risk Management in the business development process: from validating the geographical area to approving the opportunity.

ACCIONA Energía has its own methodology to analyse risks and opportunities linked to the business opportunities that it analyses, prior to approval.

This methodology aims to maintain the level of exposure to the risk within the limits set by the company, identifying and tackling the risks and opportunities at an early stage. This analysis is carried out with a double materiality approach, analysing both the risks that the project poses to the environment and people in environmental, social and ethical and compliance matters and the risks that the project represents for the company in these matters, as well as its possible operational and financial impact. For the identified risks, a mitigation and adaptation plan is established and will be implemented in case the project is developed.

This analysis is based on social and environmental reporting that is carried out from the early stages of the project, with on-site surveys, as well as a comprehensive ethics and compliance analysis that includes third-party due diligence for commercial or business partners, if any.

The outcome of this ESG risk analysis is included as input for the Investment Approval Committee's decision to approve the project.

Assessment, management and internal control of sustainability-related risks and impacts of ongoing projects

The ESG risk assessment process, conducted and audited annually, provides the control and management framework for environmental, social and governance-related risk events with actual potential to materialise.

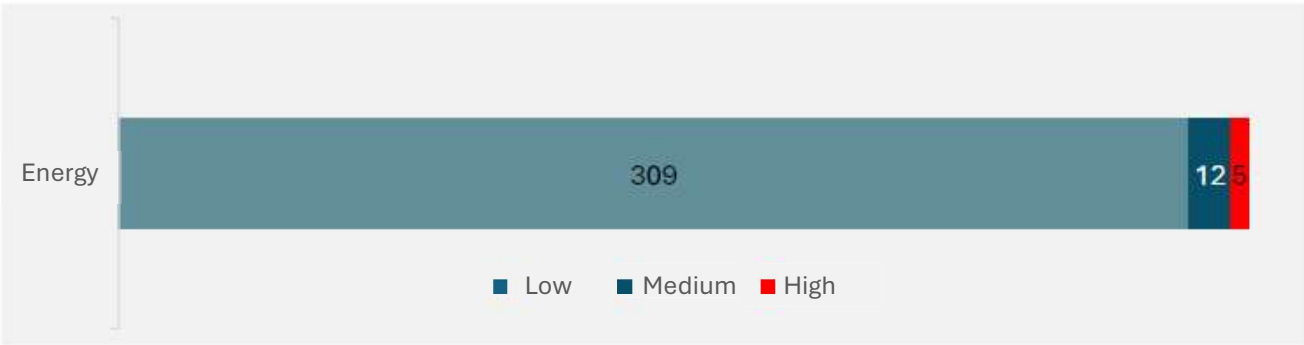
This process not only compiles risk response measures implemented or implementable in the company's facilities, but also provides a better understanding of the potential economic impact that the materialisation of various risks would have on the company (tolerance assessment).

In 2024, ACCIONA Energía continued to improve and implement its ESG Risk Management System. The main developments and results have been:

- The deconsolidation of several assets (mostly hydraulic) and the aggregated evaluation at the service-country level for some activities such as energy efficiency.
- Updating the model for calculating the consequence variable, incorporating not only the market perspective, but also turnover, so that the turnover of each centre is reflected.
- The alignment of variables with internationally used concepts so that the topics evaluated comply with external and market requirements.
- Increased traceability of the facilities assessed, aligning the assessment with business management circumstances.
- Further detail on the risk mitigation measures implemented in the projects, as well as a joint review of validation of results and the gathering of improvements and experiences related to the process.

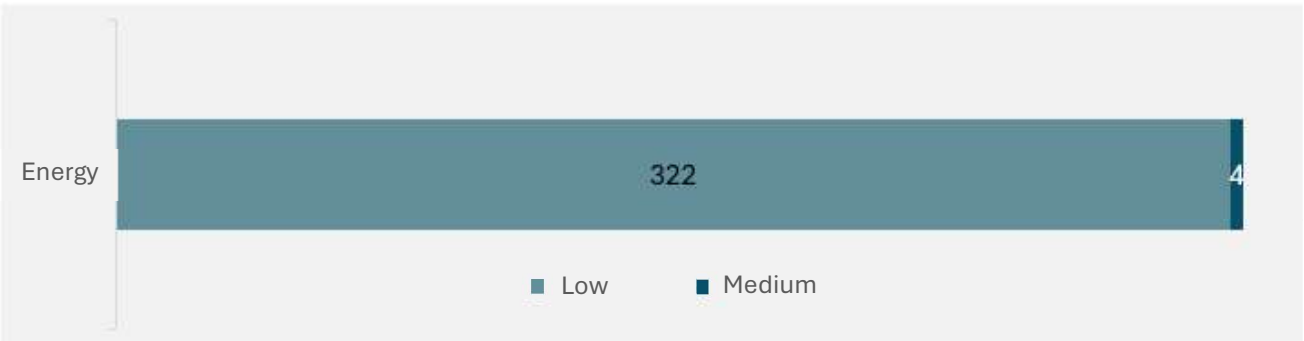
ACCIONA Energía's more than 300 facilities have been assessed on the basis of their geolocation, the likelihood of the risks identified materialising and the indicator of the economic-financial consequences for each of the ESG variables analysed.

The assessment process consists of two phases, the first analysis made it possible to classify the facilities by level of inherent risk, prioritising those that are above the set tolerance thresholds. The results of the prioritisation of centres by level of inherent risk, i.e., based on the potential exposure of the risk indicators in the geographical locations and the projected economic consequence on the business to which they belong, show generally low levels of risk in most centres.



Based on this prioritisation, a second analysis or phase was carried out, where the conclusions previously drawn in the projects were adjusted according to the management implemented or the actual circumstances of the operations or business. The functional and risk management units process and assess those centres or indicators with a high inherent risk level. This assessment recalculates the risk exposure level of the centre and indicator and compiles the mitigation and management measures implemented by the company in these environments.

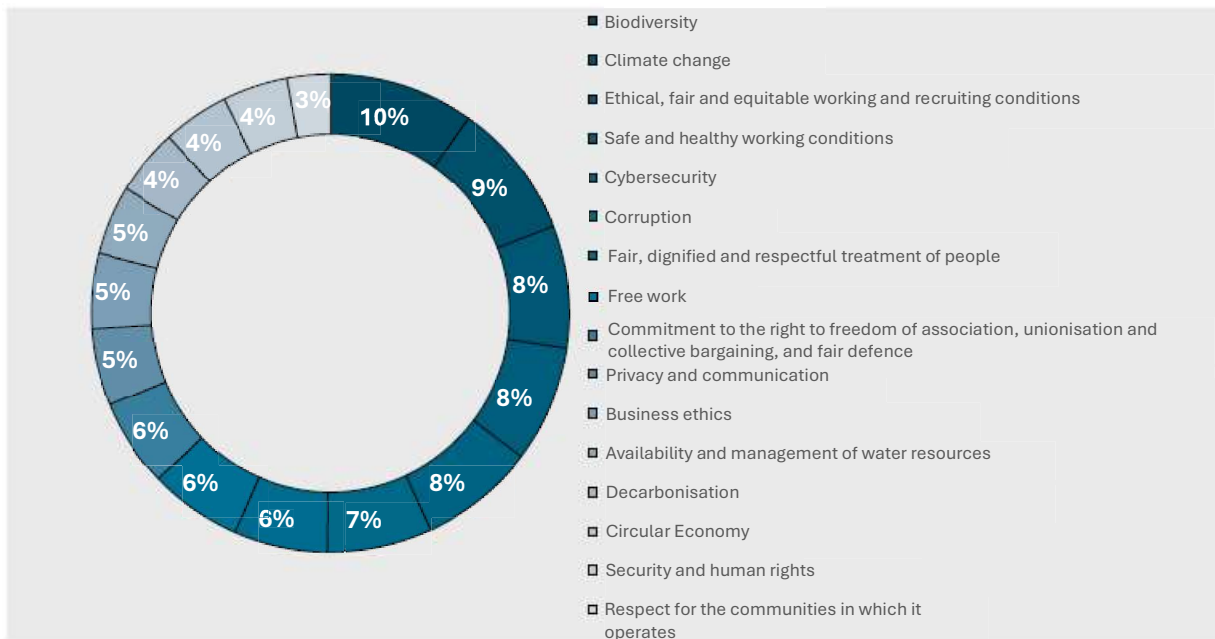
This assessment results in a decrease in exposure to risk indicators for all centres and a drop from centres at High level to Medium level.



In terms of average risk (likelihood and consequence), the highest scoring countries are: Peru, South Africa, Mexico, Croatia and Costa Rica. Therefore, in the local contexts of these facilities, more comprehensive measures are implemented to mitigate or prevent risk and recurring audits are conducted, demonstrating a commitment to maintaining a high standard of performance despite the challenges of these environments.

From the perspective of risk indicators, the following results were obtained in 2024:

Representativeness of indicators at risk level



* Rounded off

Social indicators account for the majority of the risk score with 42% of the total (vs 43% last year), followed by environmental indicators with 33% (vs 38% last year) and finally governance with 25% (vs 19% last year).

The company’s environmental management

Environmental management system certified in accordance with ISO 14001

100% of ACCIONA Energía's upstream (development, engineering and construction) and downstream activities in the life cycle of the company's renewable assets are carried out under the ISO 14001 environmental management standard. This management system is applicable not only to the renewable energy generation activity, but to all the company's activities.

The company has a specific environmental function and profiles with direct responsibility for the environmental management of projects, which has internal procedures adapted to the requirements of this certification, and resources assigned to carry out its function.

An Environmental Management System certified according to ISO 14001 implies that the company has considered and has in its environmental management:

Context of the Organisation:

- Understand the internal and external context of the organisation.
- Identify stakeholder expectations.
- Determine significant environmental aspects

Leadership:

- Demonstrate senior management commitment to the Environmental Management System (EMS).
- Establish an environmental policy that is appropriate to the purpose and context of the organisation.
- Ensure that responsibilities and authorities for relevant roles are clearly assigned and communicated.

Planning:

- Identify risks and opportunities related to environmental aspects.
- Set clear and measurable environmental objectives.
- Plan actions to address these risks and opportunities

Support:

- Provide the necessary resources to establish, implement, maintain and improve the EMS.
- Ensure the competence of the people working under the organisation's control.
- Promote awareness of the environmental policy and EMS objectives

Operation:

- Implement operational controls to manage significant environmental aspects.
- Prepare for and respond to environmental emergencies

Performance Assessment:

- Monitor, measure, analyse and assess environmental performance.
- Conduct internal and external audits to ensure that the EMS complies with the requirements of ISO 14001.
- Review by senior management of the EMS to ensure its ongoing suitability, adequacy and effectiveness.

Continuous Improvement:

- Implement actions to continuously improve the EMS.
- Correct non-conformities and take measures to prevent their recurrence.

In this regard, ACCIONA Energía, within the scope of its Environmental Management System, implemented and certified in accordance with international standard UNE-EN ISO 14001, has a methodology designed to identify and evaluate environmental impacts generated throughout the entire cycle of the company's facilities and to identify potential risks for business activity in incident and/or emergency situations.

Identification and assessment of environmental impacts in the life cycle of facilities

In accordance with ACCIONA Energía's process map, the following stages are identified in the life cycle (GAE07024):

For new facilities

a) An Environmental Impact Assessment (EIA) is carried out covering the entire life cycle of the asset from construction to decommissioning. The detail and content of this assessment is set out in the procedure: "Environmental analysis. Design and development phase". Every design and construction project relies on it.

It identifies and assesses the environmental aspects of the project related to: pollution, water and marine resources, waste, biodiversity and ecosystems, landscape, cultural and archaeological heritage, and socio-economic environment, among others.

b) A Life Cycle Assessment is carried out based on the ISO14040 standard to consider aspects related to the acquisition of materials and generation/consumption of resources "from cradle to grave" (along the entire upstream value chain to the origin of the raw material at the end of its life cycle) not already analysed in the EIA. LCAs provide information on climate change impacts, resource use and pollution.

During the operating and decommissioning phase

Based on what was identified in the EIA and the LCA, a complete assessment and prioritisation of environmental aspects is carried out during the operating phase, in order to monitor the entire useful life of the plant, considering normal operating activity and those situations of non-routine, but controlled, voluntary, planned and foreseeable operation, from which an environmental impact may arise. This assessment and prioritisation is reviewed every 3 years to ensure its validity throughout the life cycle of the assets.

In addition, 6 months before the end of the useful life of the project, a detailed analysis of environmental aspects is carried out, aimed at assessing the environmental impacts derived from decommissioning.

To this end, the company has specific procedures to identify and assess environmental aspects, both common to all technologies and specific to each asset type and environmental impact.

In addition, the new ISO 14001:2015 approach to risk assessment has led to environmental risks and opportunities being further incorporated into the company's overall risk management, with the resulting actions being included in the environmental planning of each facility/technology, as well as in the environmental objectives and in Management's review of the system itself.

Identification and management of risks at the consolidated level

The consolidated analysis of environmental risks in both the construction and operating phases is carried out by applying the corporate procedure PCMA04, which includes: the identification of environmental impact scenarios, the evaluation of these scenarios in terms of the likelihood and their consequences, the compilation of the results on a risk map and the preparation of risk treatment sheets.

These risks are represented in the risk matrix drawn up annually by ACCIONA Energía, prioritising the management of what are considered higher risks.

INTERNAL CONTROL SYSTEM FOR SOCIAL SAFEGUARDS

Since 2021, ACCIONA Energía has had a procedure and an integrated social safeguard risk assessment and compliance management system in addition to an auditing system. The Internal Control System for Social Safeguards (ICSSS) is based on the internal control models developed by the Committee of Sponsoring Organisations of the Treadway Commission (COSO), and on the company's combined assurance methodology based on the three lines of defence model. The ICSSS promotes and consolidates a true culture of compliance with and respect for current legislation and reference international rules and principles on human rights.

Control environment

The control environment defines how risks are managed in an organisation, considering the management philosophy, ethical values and the operating environment. The Audit and Sustainability Committee oversees the effectiveness of financial and non-financial risk management and control systems.

ACCIONA Energía has a Code of Conduct that promotes ethical principles and respect for human rights, applicable to employees, partners and suppliers, and an Ethics Channel for reporting any wrongdoing.

Risk assessment

ACCIONA Energía manages risks by identifying, assessing, prioritising and implementing control systems and mechanisms to prevent these risks from materialising. It first identifies the risks and then carries out a risk analysis.

The risk and control matrix of the ICSSS contains the human rights risks that have been identified, analysed and prioritised. The Sustainability Division reviews them annually and, where necessary, updates the risk and control matrix and the associated regulations.

The facilities have been assessed according to their geolocation, the likelihood of the risk materialising and an objective indicator of the economic and financial consequences for each of the variables analysed. Following the inherent risk assessment, a consultation process was carried out with those responsible at project level to adjust the conclusions previously drawn, as well as to analyse the risk mitigation measures implemented and propose new mitigation measures.

Control activities

These are the actions derived from the company's policies, rules and procedures in order to mitigate each human rights risk. The ICSSS has 80 internal controls and documents them with a number of attributes that characterise them, including the area or division responsible for their implementation and the specific description of the control activity. The risk and control matrix includes the Social Safeguards controls and their attributes, as well as their association with the relationship of risks they are intended to prevent or mitigate, and can be found in the ACCIONA RMS (ACCIONA Corporate Risk Management System/MetricStream) tool.

Monitoring activities

The Audit and Sustainability Committee oversees the Social Safeguards Internal Control System, delegating the Internal Audit Division to review its effectiveness in preventing and mitigating human rights risks. It is monitored through the ACCIONA-RMS platform, where those responsible for the controls confirm their effectiveness and report possible non-compliance. After monitoring, reports are generated with findings, recommendations and action plans. The Sustainability Division coordinates the

corrections, and the Internal Audit Division reports the results to the Committee. In 2024, it was concluded that the system was properly implemented.

Supervision of the functioning of the Internal Control System for Social Safeguards is additionally carried out through independent third-party on-site audits of the company's projects, services and activities. The scope incorporates the following criteria and relevant aspects related to best practices in human rights: the International Bill of Human Rights, the Conventions of the International Labour Organization (ILO), among other international reference standards. The audits, in 2024, have included interviews with own workforce in relation to the audited areas. Upon completion of the external monitoring procedures, reports are drawn up reflecting the results, and in case of detection of actual adverse effects or recommendations for improvement, specific action plans are designed to remedy them. ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse human rights impacts.

Information and communication

The Sustainability Department meets regularly with the Board of Directors, through its Audit and Sustainability Committee, as well as with investors, customers and other stakeholders, in order to oversee both the good sustainability practices of corporate social responsibility in environmental and social matters, and the Social Safeguards Internal Control System, in accordance with ACCIONA Energía's General Communication Policy, which sets out the reporting and communication procedures for financial, non-financial and corporate information.

+ More information: [Annex IV on Stakeholder Relations Policy](#)

STRATEGY

[SBM-1] STRATEGY, BUSINESS MODEL AND VALUE CHAIN

ONLY IN RENEWABLES

More than 30 years promoting the decarbonisation process

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies⁷, with no ties or legacy related to fossil-fuel technologies.

RENEWABLE ENERGY FOR A SUSTAINABLE PLANET

ACCIONA Energía took its first steps in the energy sector in the early 1990s, with a business model based solely on renewables, through the construction of Spain's first wind farms and investment in hydroelectric power plants. In the 2000s, in addition to investing in generation, it began to market its own wind turbine technology through ACCIONA Windpower, now part of Nordex (a company in which the ACCIONA Group is the main shareholder). ACCIONA Energía was also a pioneer in the solar photovoltaic business, biomass technology and the operation of solar thermal power plants.

Today, the company operates 15.3 GW of owned renewable capacity and provides decarbonisation solutions to customers in 24 countries on 5 continents. This early commitment to sustainability and diversification has enabled the company to position itself as a pioneer in the development of technologies to combat one of the main challenges facing humanity: the climate emergency. Its team played a key role in defining the methodologies and tools that today underpin renewable sector standards, and this extensive track record has allowed it to develop technical expertise and a long-term strategic vision that is globally recognised.

The company has a robust platform of renewable electricity generation assets, making a total of 15,354 MW, of which 67.8% use wind technology, 25.6% solar photovoltaic, 4.5% hydroelectric, and 1.2% storage, and the remaining capacity takes the form of biomass and solar thermal power plants. 37.2% of the power is in Spain, and the rest internationally, distributed in the United States, Canada, Mexico, Costa Rica, Chile, Peru, Dominican Republic, Portugal, Italy, Poland, Croatia, Ukraine, India, Vietnam, Australia, South Africa and Egypt. In addition, the company operates in France through an energy efficiency company and is active in the development and construction of renewable projects in Southeast Asia.

With this, ACCIONA Energía was able to produce around 26.7 TWh in 2024, sufficient to supply approximately 6.3 million people; with prospects for growth in regions such as Australia, North America, India, Southeast Asia, South Africa and Europe.

In its clear orientation towards being a leader in sustainable investment, the company places a strong emphasis on anticipating technological trends and maintains a firm commitment to innovation. All of this places ACCIONA Energía in an ideal position for continuing to lead the advance toward a decarbonised and electrified economy, based on emission-free sources.

⁷ Source: calculated using S&P data, excluding Chinese operators.

	2024	2023
Turnover (€ Mill.)	3,048	3,547
EBITDA (€ Mill.)	1,123	1,285
Total installed capacity (MW)	15,354	13,523
Total production (GWh)	26,708	24,894

The company is included in the S&P Global Clean Energy Index and the IBEX 35, and in 2024 DBRS Morningstar and Fitch maintained the company in the investment category, confirming its capacity for growth and financial strength.

AN INTEGRATED BUSINESS MODEL FOR FULL DECARBONISATION

In order to provide the necessary tools for climate change mitigation, ACCIONA Energía has succeeded in creating a distinctive identity as a diversified and integrated company across the entire renewable energy value chain. The company covers project development, financing, procurement, engineering and construction, operation and maintenance and energy management activities. In addition, to be able to address the decarbonisation of end uses, the company offers 100% renewable energy consumption solutions, as well as an integrated and optimised management of energy use by companies, municipalities and public institutions.

Project development	Financing	Engineering and construction	Operation and asset management	Integrated energy management	End-use solutions
Local hubs with global reach with a team of >100 people. Early accompaniment of local communities	Tailor-made projects to optimise the cost of energy	In-house capabilities with +30 years of experience Large-scale bargaining power (approx. 2,900 master agreements) Preferred customer of Nordex-ACCIONA Windpower	Predictive maintenance for useful life extension. High asset availability compared to market standards c. 70% of incidents settled remotely.	Comprehensive energy management: 24/7 monitoring and revenue optimisation	Preferred partner of large multinationals and expansion in trading and energy services: B2B, B2G and B2C

ACCIONA Energía's culture integrates the optimisation and anticipation of operational risks, with high standards that seek to maximise profitability, extend the useful life of its assets and adopt a solid preventive approach to matters such as health and safety. In its operations, the company works with the most advanced management systems, such as those for predictive maintenance and optimisation of electricity sales, supported by CECOER (Renewable Energy Control Centre), one of the largest and most sophisticated renewable energy control centres in the world.

At the same time, the company's constant commitment to new technologies positions it as a forerunner in new vectors that will play a crucial role in the future of end-use decarbonisation, such as storage solutions or green hydrogen, technologies in which it is already actively investing.

100% RENEWABLE GENERATION WITH A FOCUS ON OPERATIONAL OPTIMISATION

Over the course of 2024, the company reaffirmed its ability to consolidate and scale its growth in the medium to long term by successfully installing 2.2 GW of new capacity. This figure exceeds the record growth recorded in 2023, and reflects new investments in Spain, Croatia, the United States, Canada, Australia, the Dominican Republic and India.

Wind power

ACCIONA Energía is the world's 7th largest wind power operator by owned net installed capacity, according to S&P. In 1993, it began the construction of the first wind farm in Spain, in Tarifa (Cadiz), repowered in 2018 and, in 1994 it put the El Perdón (Navarre) wind farm into operation, the oldest commercial wind power facility in Spain, still operating with very high availability levels.

Among other milestones, in 2024, significant progress was made in the construction of Australia's largest wind farm, MacIntyre, with a total capacity of approx 1 GW, whose first 27 wind turbines started production in October 2024. In North America, the 280 MW Forty Mile wind farm began supplying clean electricity to Alberta, and ACCIONA Energía expanded its US portfolio with the acquisition of Green Pastures I and II, whose combined capacity is 300 MW.

ACCIONA Energía also began construction of the 101 MW Kalayaan II wind farm in the Philippines in 2024, as well as the repowering of the Tahivilla wind farm, which will go from 98 wind turbines to 13 Nordex turbines. In Croatia, the 27 MW Opor and 45 MW Boraja II wind farms will be energised in 2025 after commissioning.

Solar photovoltaic

In 2001, the company commissioned its first company-owned photovoltaic plant (Tudela - 1.2 MW), the largest solar installation in Spain at that time and a pioneer in the concept of solar farms for private owners. Today, ACCIONA Energía is a major international player in solar photovoltaic energy, with 3,931 MW company-owned, and with 46 active plants in 11 countries.

Among other milestones in 2024 was the construction of the Cotoperí photovoltaic plant (162 MWp) in the Dominican Republic and the start of construction of the third photovoltaic plant in the country, Pedro Corto (83 MWp), which will bring ACCIONA Energía's installed capacity in the country to 300 MW. The year also saw the commissioning in Texas of the company's largest solar project, Red-Tailed Hawk (458 MWp). With this project, the company now has a total of 1.3 GW installed in the US. In Australia, construction continues on the 486.8 MWp Aldoga project, and in India, the Juna plant, which will be completed in 2025 and will be the company's largest plant in the country (412 MWp). In Spain, ACCIONA Energía completed its second hybridisation with the construction of a 19.7 MWp photovoltaic plant on the site of its Peralejo wind farm (26 MW).

ACCIONA Energía was also awarded a 12-year 'Contract for Difference' in Croatia for the Promina photovoltaic plant (189 MWp), and in the Philippines, the Daanbantayan photovoltaic project (196 MWp) in Cebu has been declared a "green path" (strategic investment) by the Board of Investment.

Hydroelectric

ACCIONA Energía has solid experience in this technology, with operating assets over 100 years old. In 2024 it operated 74 company-owned hydroelectric power plants located in various river basins in Spain with a combined capacity of 868 MW, including an 89 MW hydraulic pump station.

In 2024, the company was immersed in an intense asset rotation activity to streamline the portfolio and finance growth, which resulted in the sale of a first package of 175 MW of hydro assets to Elawan Energy and the agreement to sell an additional 626 MW of hydro assets to Endesa, which is expected to be finalised in the first half of 2025.

Thermal renewables

ACCIONA Energía already has 61 MW in three pioneering biomass plants in Spain and 64 MW in a solar thermal plant in the United States. In 2023, the company began construction of the biomass plant in Logrosán (Extremadura) which, as of 2025, will start to produce biomass while avoiding the emission of more than 165,000 tonnes of CO₂ into the atmosphere per year.

Battery storage

In the 2010s, ACCIONA Energía promoted pioneering initiatives for the integration of battery storage with solar photovoltaic and wind energy and, today, it is recognised as a benchmark in the incorporation and effective operation of these models, with large-scale plants in operation and under development in high-potential markets.

The largest battery project in Texas (190 MW), acquired in 2022 along with a portfolio of more than 1 GW of storage in the United States, began operations in 2023, and during 2024 progress was made on the development of additional projects in the country.

COMPREHENSIVE DECARBONISATION SOLUTIONS FOR CUSTOMERS

Energy sales

The company is a leader in the sale of 100% renewable energy to customers, both long term globally and short term in Spain and Portugal, being the largest 100% renewable energy supplier in Spain according to the Spanish Markets and Competition Commission (Comisión Nacional de los Mercados y la Competencia). ACCIONA Energía has an established trading activity for large customers and SMEs in the Iberian Peninsula, with more than 30,000 supply points. In addition, the company has trading structures in Chile and Mexico that provide access to a wide range of customers.

Throughout the year, there was intense activity in the sale of short, medium and long-term energy, exceeding contracting targets and reaching a total of 19.8 TWh of renewable energy contracted. In 2024, it signed power purchase agreements (PPAs) with DaVita and Iberostar in Spain, with Vidrala in Spain and Portugal, and with Brembo in Poland.

Energy efficiency

ACCIONA Energía designs and invests in solutions that optimise customers' energy consumption and reduce their carbon footprint. The company offers services focused on improving the energy efficiency of facilities and production processes, both for public entities and private customers, in various sectors

and territories, with customers such as Unibail Rodamco, González Byass and Gijón City Council, among others. The main markets in which the company operates include Spain, France and Mexico, and it carries out the energy management of more than 6,000 customer installations in nearly 50 countries from the Digital Energy Services Control Centre in Madrid.

In 2024, the company was accredited by the Spanish Ministry for Ecological Transition and the Demographic Challenge to process energy saving certificates (CAE), allowing it to manage, buy and sell these certificates, an activity it already carries out in France. Among the most significant milestones of the year were the ESCO contracts signed with a large automotive company in the US and Canada, the consolidation of the business in Mexico with new contracts for lighting, ventilation and process efficiency projects for factories of large multinationals, and the expansion and strengthening of the French portfolio of efficiency services.

Demand management

ACCIONA Energía is a demand response operator in France, where industrial and tertiary consumers are already able to put their electricity flexibility at the service of the grid during consumption peaks. Through internally developed digital tools, the company is able to offer digital energy services of flexibility and aggregation to the electricity system, to customers such as Bouygues, Pasquier or Wepa.

In Spain, the company is already involved with customers in the early stages of the active demand response service, preparing capacities in view of the relevance that local markets will have as a system management tool, through the direct exchange of energy and flexibility between coordinated end users, either centrally (through an aggregator) or in a distributed manner.

Electric vehicle charging

ACCIONA Energía's charging business has grown consistently in the electric charging sector in Spain, focusing on urban and interurban charging, and charging for businesses. The business surpassed 1,300 locations signed or operational in 2024.

Among the year's major milestones, the construction of Madrid's largest urban electro-lift station was announced, with capacity for almost 100 vehicles, and an agreement was signed with the shopping centre owner Unibail-Rodamco-Westfield (URW) to install 180 new charging points in Spain. The business also expanded internationally this year, with the awarding of the first petrol station in the town of Posedarje in Croatia.

Self-consumption

ACCIONA Energía offers, on the one hand, distributed generation solutions through renewable self-consumption to large customers (photovoltaic, wind, microgrids, both for grid-connected and off-grid systems), with the aim of optimising resources and maximising the associated energy and economic savings.

On the other hand, in 2023, ACCIONA Energía began to offer self-consumption solutions for residential customers and SMEs in Spain, thanks to the acquisition of the company Solideo, which also offers batteries for electrical storage, charging points for electric vehicles and aerothermal air-conditioning systems.

Among other customers, in 2024, ACCIONA Energía signed an agreement with Viscofan for the installation, operation and maintenance of a photovoltaic self-consumption system at its facilities in Navarre (Spain) for 30 years, with a capacity of 48.11 MWp. ACCIONA Energía will also install up to 10.5

MWp of photovoltaics on the roofs of Prologis' warehouses and buildings, turning them into solar communities.

In addition, an agreement was signed with Ikea in Spain to bring self-consumption and energy efficiency solutions to homes, including charging points for electric vehicles. ACCIONA Energía will be responsible for their installation and maintenance, as well as offering advice on the best solutions in each case.

Green hydrogen

In 2022 ACCIONA Energía inaugurated the first industrial renewable hydrogen plant in Spain (in Lloseta, Mallorca), which has become a reference in Europe as the first hydrogen ecosystem. Furthermore, amongst many other initiatives, the company progresses in the development of pilot projects in countries with high potential for green hydrogen production, such as Chile.

In Spain and Portugal, the joint venture ACCIONA Plug continues to develop a portfolio of projects. In 2023, the Spanish government, through IDAE, allocated subsidies to its 'Valle H2V Navarre' project to promote the construction of an industrial-scale green hydrogen production plant (25 MW electrolyser) on land adjacent to the Sangüesa biomass plant of ACCIONA Energía.

In 2024, ACCIONA Plug announced the construction of a new 25 MW electrolysis project in Zaragoza. According to current estimates, work could begin in mid-2026, with commercial operation expected by the end of 2027.

ACCIONA Energía is also part of the Acciona Nordex Green Hydrogen joint venture to develop green hydrogen projects in high energy resource areas. This joint venture between ACCIONA, ACCIONA Energía and Nordex aims to produce 0.5 million tonnes of green hydrogen per year over the next ten years, and already has sites for developing projects in the United States, Latin America and Africa.

New energy and circular economy solutions

The company remains very active in the progress of new renewable generation optimisation models (such as hybridisation or repowering), the expansion of the offer to customers, the commitment to new technological niches (such as vehicle-to-grid or floating wind and solar), the promotion of digital transformation and new circular economy solutions.

Among other milestones, in 2024, ACCIONA Energía began installation of a new storage system using recycled electric vehicle batteries at its Extremadura I-II-III photovoltaic plant, located in Almendralejo (Spain) and built to support the long-term power sales agreement signed with the pharmaceutical group Novartis AG.

At the Sierra Brava floating solar plant (Cáceres, Spain), ACCIONA Energía installed a new hydro-elastic membrane technology photovoltaic flotation system to evaluate its performance. In the circular economy, during the year, the Waste2Fiber® wind blade recycling plant, promoted by ACCIONA, was declared a project of regional interest by the Autonomous Community of Navarre (Spain). Also in 2024, ACCIONA Energía and Vidrala, a leading company in the design and manufacture of glass containers, carried out an innovative pilot project to reuse 230 tonnes of biomass slag generated during the combustion process at the Briviesca biomass plant in the manufacture of 18.3 million glass bottles.

ACCIONA Energía has also continued its commitment to innovation in floating wind power technology with Eolink, a start-up in which it is the main shareholder and which has developed a pyramidal platform that orients itself according to the direction of the wind, maximising its performance. In 2024, progress has been made in the construction of the first pre-commercial scale pilot, which will have an output of 5 MW.

 **More information:** [ACCIONA Energía solutions](#)

SCALE UP GROWTH

Backed by its 30 years of experience and global reach, its origination and execution capabilities, as well as the strength of its portfolio, balance sheet and extensive base of profitable assets, the company has strong project development capabilities that further boost its flexible and balanced strategy for future growth.

ACCIONA Energía remains committed to continuing to invest in clean energy assets in the coming years, with a focus on North America, Australia and Europe, complemented by growth in other high-potential territories. To this end, the company has a diversified, flexible and 100% renewable project portfolio of more than 30 GW, including onshore wind and solar PV, storage, offshore wind, biomass, and pumped hydro.

In addition, the company will continue to explore and develop new opportunities arising from its sustainability-focused business model, such as the expansion of end-use decarbonisation solutions and the stability of renewable system integration. This growth implies not only investments in physical assets, but also continued growth in fully digital businesses.

With this diversified and forward-looking approach, the company has established its capacity for expansion, adapting to business needs and meeting robust profitability standards.

With its fleet of high-quality, high-value operating assets and a flexible and prudent commercial policy, ACCIONA Energía has managed to maintain a solid financial and credit profile. Maximising profitability, portfolio streamlining and financial discipline are key priorities in all business decisions, with the ultimate goal of maintaining results that increase investment capacity. The company protects its financial solvency and long-term sustainability, without sacrificing profitability for growth.

RENEWABLE MARKET TRENDS

Global renewable energy market overview

Renewable energies have proven to be the key to providing greater energy independence, making progress in the fight against climate change and fostering the creation of new industrial opportunities. These technologies have proven to be safe, competitive and promoters of local wealth, thus becoming an essential lever to achieving sustainable development goals.

Renewable generation capacity already reached a record high in 2023⁸, with more than 560 new GW added during the year. This growth was driven by steady cost reductions in clean technologies over the last decade, especially solar photovoltaic and wind energy. Investments in renewable projects approached \$2 trillion, almost double the amount invested during the year in fossil fuels⁹.

These achievements are not only limited to generation technologies, but have also been extended to sectors that are key to decarbonisation. To exemplify the paradigm shift in the transport sector, in 2010 global sales of electric vehicles were around 100,000 while in 2023 the figure rose to approximately 14 million¹⁰. However, despite this rapid growth, efforts are still insufficient to limit the global temperature increase to the 1.5°C threshold.

To achieve this goal, it is necessary to accelerate the rate of new renewable installations in most emerging and developing economies outside the G20 -which currently account for almost 90% of global renewable energy capacity-, as well as to boost the transformation of demand towards electrification and fossil fuel reduction, to invest in and reinforce transmission and distribution networks, and to boost the take-off of emerging clean technologies such as green hydrogen.

In addition, the challenge of planning must be anticipated to ensure an adequate balance in the integration of renewable energies into electricity systems, while greater efforts are made to prepare the workforce for the global carbon neutrality scenario and to promote social acceptance in the territories that host renewables, through measures to bring them closer to the community at an early stage.

Continued drive by the public sector towards decarbonisation

At the 2023 United Nations Climate Change Conference (COP28), 117 countries set a target of tripling global renewable energy generation capacity by 2030. Renewable energies are no longer just a sustainable option but have become the most competitive and secure source of generation, consolidating themselves as the best alternative. As a result, governments are adopting various public policy measures. These include the European Union's Green Deal Industrial Plan, India's Production-Linked Incentives (PLI) and the Inflation Reduction Act (IRA) in the United States, all designed to boost sustainable energy integration. In China, supportive economic policies have accelerated wind and PV projects, enabling the country to surpass its national 2030 targets years ahead of schedule.

In addition, evolving regulation related to climate change and the growing commitment of many companies to decarbonisation is increasing demand for renewable energy in the private sector, fuelling further growth.

Electricity demand and new growth drivers

⁸ IEA. World Energy Investment 2024.

⁹ *Idem*.

¹⁰ IEA. Global EV Outlook 2024.

While electricity demand in developed countries has stagnated in recent years, due to the slow pace of substitution of polluting fuels, the global picture reflects a sustained growth in demand, driven mainly by strong economic growth in emerging countries. In the short term, a progressive acceleration of electrification as the main pathway to end-use decarbonisation is anticipated, supported by technological breakthroughs and more ambitious energy policies. In the transport sector, the rapid expansion of electric vehicles is boosting electricity consumption and contributing to better air quality. In industry, the electrification technologies available today, such as heat pumps and electric furnaces, could cover about 60% of industrial energy demand. Meanwhile, in buildings, the transition from fossil fuel-based air conditioning systems to electric heat pumps is expected to significantly transform the energy landscape.

Innovation is playing a crucial role in generating new uses for electricity. Green hydrogen production through renewable electrolysis is emerging as a key solution for hard-to-abate sectors. Likewise, 2024 also saw increased conversations around data centres, where investment has grown exponentially over the past two years, driven by the rise of digitalisation and the accelerated adoption of artificial intelligence (AI). This phenomenon, which is expected to continue to gain momentum worldwide, has concentrated much of the spending in the United States, where annual investment in data centre construction has doubled. In 2023, the total capital investment by leading companies in adopting artificial intelligence and installing data centres was greater than that of the entire US fossil fuel industry, reaching approximately 0.5% of the country's GDP¹¹.

Challenges in network integration

As the integration of renewables into global energy systems increases, a number of technical, economic and regulatory factors emerge that must be anticipated to ensure an effective energy transition. These challenges, which vary according to local conditions, highlight the need for innovation and adaptive policies.

By 2040, electricity grids globally will need to expand and modernise to the equivalent of double their current size to support the energy transition, achieve universal access and manage increasingly complex energy flows. Mobilising the necessary investment, while ensuring affordable energy supply for all, will be a joint task between the public and private sector.

In parallel, storage technologies have emerged as one of the key enablers of flexibility and stability, allowing surplus energy to be stored, minimising curtailments and injecting that same energy into the grid when wind and solar resources are unfavourable for electricity production. This is why both batteries and long-life energy storage technologies will be increasingly important for the expansion of a balanced renewable system, as well as the hybridisation of clean technologies, highlighting those that are complementary in production, such as wind and solar.

Developing opportunities in industrial decarbonisation

The main obstacle facing industry, beyond electrification, is the decarbonisation of hard-to-abate emissions, especially in sectors such as steel, cement and chemicals. These sectors rely heavily on processes that require high temperatures, emit CO₂ as a by-product of chemical reactions and face structural challenges that make electrification difficult.

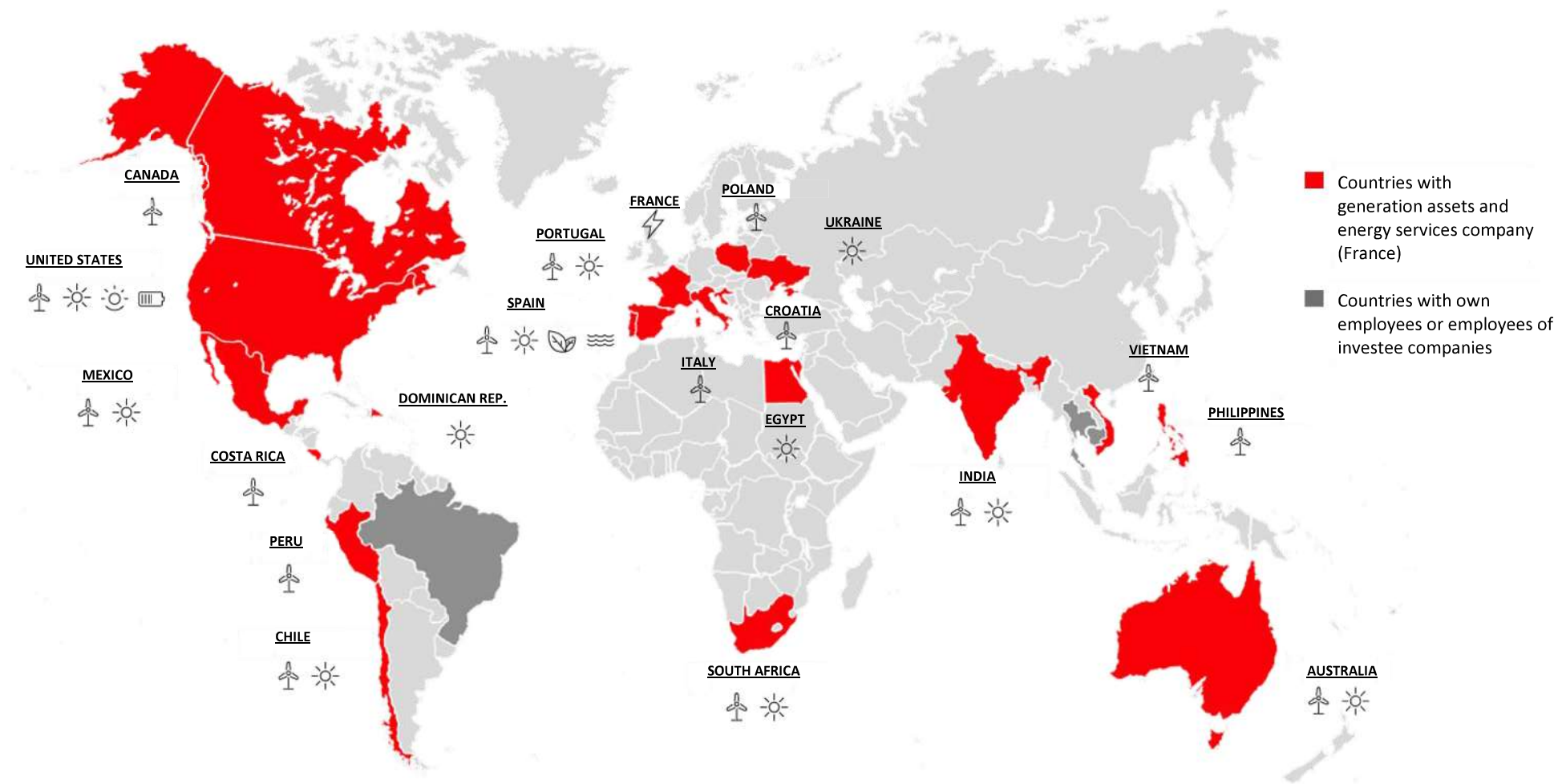
In addition to technical difficulties, economic factors such as low profit margins, capital intensity of investment and long asset lifetimes limit the flexibility to adopt new technologies.

¹¹ IEA. What the data centre and AI boom could mean for the energy sector. 2024.

At this juncture, the sector presents a number of opportunities such as efficiency. For example, the steel sector is moving towards the circular economy as an easy-to-implement solution to reduce emissions. There is also a need to develop the green molecule industry, which will replace fossil fuels. While electrification must remain the main strategy for reducing fossil fuel use, decarbonisation of hard-to-abate sectors will depend heavily on progress in the green hydrogen sector in particular, and other solutions such as bioenergy and carbon capture technologies. These technologies for hard-to-abate sectors are still in their early stages and need strong public support, which is increasingly present.

ACCIONA ENERGÍA WORLDWIDE

The company is present in 24 countries on five continents.



In 2024, as part of its strategy of geographical and technological diversification, ACCIONA Energía began construction of its first wind farm in the Philippines, Kalayaan 2, a high-growth market, and continues to grow in markets in which it has recently invested, such as the Dominican Republic and Peru.

The company will continue to grow its project portfolio, and will use asset rotation to maintain a strong balance sheet as part of a major investment effort.

The year was marked by intense activity in this regard, resulting in the sale of its stake in a wind farm in Hungary, the closing of the sale of a first package of 175 MW of hydro assets in Spain and the agreement to sell an additional 626 MW of hydro assets also in Spain.

INDICATORS*	AMERICA	SPAIN	REST OF EUROPE	AUSTRALIA	OTHER AREAS
SALES million euros	699	1,889	316	65	79
EBITDA million euros	396	504	91	67	65
INSTALLED POWER Total MW	6,206	5,718	625	1,895	910
ENERGY PRODUCED Total GWh	10,308	12,353	1,035	1,423	1,589
AVOIDED EMISSIONS thousands of tonnes of CO ₂	5,953	5,260	564	1,243	1,335
R&D&i EXPENDITURE million euros	55	16	0	92	0
WORKFORCE employees	709	1939	172	293	112

*Figures rounded to the nearest unit, may not add up to the total

INDICATORS*	WIND POWER	PHOTOVOLTAIC	HYDROPOWER	BIOMASS AND SOLAR THERMAL	OTHER
SALES million euros	1,300	180	181	71	1,316
EBITDA million euros	684	183	214	25	17

*Figures rounded to the nearest unit, may not add up to the total

INTEGRATED DIAGRAM OF THE COMPANY'S BUSINESS AND VALUE CHAIN MODEL¹²

VALUE CHAIN ¹³				ACCIONA ENERGÍA OPERATIONS		SOCIETY
Materials for components	Manufacture of equipment, materials and other supplies and services	Logistics	Installation and maintenance	ACCIONA Energía's business model	ACCIONA Energía's customers and partners	Society at large
Upstream suppliers: they supply our first-tier suppliers with the raw materials and components essential to the manufacture of the products purchased by the company.	Suppliers of key equipment and supplies for renewable assets and energy end-use solutions, including, among others: <ul style="list-style-type: none"> • Large components: wind turbines, photovoltaic panels, electric vehicle charging points. • Electrical equipment: 	Logistics services for the transfer of components purchased by the company by sea, air and land.	Suppliers dedicated to the installation and assembly of renewable assets and, in certain territories, to the maintenance of generation assets.	The company operates in the following areas: <ul style="list-style-type: none"> <u>1. Generation of renewable energy</u> - Project development and financing - Engineering and construction - Operation, maintenance and management of 100% renewable assets and storage <u>2. Integrated energy management</u> 	Business, industrial and household groups to which the company supplies renewable energy and to which it provides end-use solutions. They benefit from a competitive, quality and emission-free energy supply, as well as from solutions provided by the company to optimise their energy consumption and costs, and to	It experiences the indirect benefit of a cleaner energy mix, lower energy costs, optimisation of energy use, the contribution of renewable energies to energy independence and local prosperity.

¹² The diagram represents ACCIONA Energía's activity, although it is not exhaustive.

¹³ The process the company has in place to manage and develop its supply chain and contractors is explained in detail in the chapters: [G1-2] Sustainable Supply Chain and [S2] Workers in the value chain.

<p>substations, inverters, cables and transformers.</p> <ul style="list-style-type: none"> • Mechanical and electrical components and spare parts. • Specialised services: engineering, consultancy and general services. 		<ul style="list-style-type: none"> - Renewable Energies Control Centre (CECOER) - Energy sales dispatch - Energy Services Control Centre <p><u>3. Comprehensive decarbonisation solutions for customers</u></p> <ul style="list-style-type: none"> - Sale of renewable electricity - Energy services and self-consumption for businesses and households - Demand management - Electric vehicle charging - Green hydrogen - New energy and circular economy solutions 	<p>decarbonise their operations.</p> <p>Partners with whom the company develops projects, operates assets or participates in asset rotation processes.</p>
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2025 Sustainability Master Plan

Since 2010, ACCIONA’s sustainability strategy has been based on five-year Sustainability Master Plans (SMPs). The actions and targets contained in these plans are promoted, approved and supervised by the Board of Directors’ Audit and Sustainability Committee.

The implementation of the company’s sustainability strategy and the meeting of commitments are linked to a percentage of the bonuses received by executives, managers and some technical and support staff. This annual assessment considers the achievement of sustainability targets such as the reduction of greenhouse gas emissions, through the EFG budget, our presence on well-known ESG benchmarks and rankings or the fulfilment of objectives linked to gender equality and risk prevention metrics.

Each of the four 2025 SMP pillars has several action areas and a marked path to produce a regenerative impact by the end of the period set. They are as follows:

People-centric

ACCIONA Energía’s strategy is driven by its employees. The company enhances its appeal in terms of attracting and retaining top talent, while promoting inclusion and quality of life.

LEVER	MEANING	PROGRESS 2024
Leadership	Create agents of change capable of adding differential value.	<ul style="list-style-type: none">• Emphasis on a new leadership model based on: (1) individual development plans, promotion of internal mobility and retention of key talent, (2) international development programmes to promote technical training, (3) mentoring processes, (4) talent development programmes segmented by critical groups and (5) training programmes for managers and executives.
Diversity	Become a more diverse company, in order to improve resilience and competitiveness.	<ul style="list-style-type: none">• Launch of innovative programmes for the inclusion of people with disabilities, improving the accessibility of physical and digital environments.• Development of 50:50 programmes that enable the incorporation of female talent in Operation and Maintenance areas.
Recognition	Improve our model, ensuring better recognition of excellence and outstanding effort.	<ul style="list-style-type: none">• In 2024 we marked the completion of the first edition of the Youth Committee, an intergenerational development initiative in which 12 high-potential young people represented the members of ACCIONA Energía’s Global Committee.• The different Academies have promoted technical and transversal learning of key competences and performance in technical areas and/or critical functions.• Evolution of the Performance Management model, with more active involvement of managers.



Environment	Have a smart and secure workplace, a reflection of ACCIONA values	<ul style="list-style-type: none">• Development of the health and well-being programme by medical specialities on the Campus
Access	Ensure compliance with the fundamental rights of all people involved in our value systems	<ul style="list-style-type: none">• The Social Safeguards Internal Control System has been enriched by independent third-party audits of projects in accordance with International Labour Organisation (ILO) Conventions and other international reference standards.• Increased number of ESG audits of Tier 1 and Tier 2 suppliers

Planet Positive

Through its *Business as Unusual* approach, ACCIONA Energía focuses on projects that can provide tangible solutions, such as decarbonising the economy and mitigating and adapting to climate change. The company integrates circularity in every aspect of its operations, striving to improve resource efficiency, minimise environmental impacts, and promote quality of life for local communities.

LEVER	MEANING	PROGRESS 2024
Climate	Continue to be a main player in the transition towards a decarbonised economy.	<ul style="list-style-type: none">• 100% of CAPEX aligned with the European taxonomy for sustainable activities• 75% reduction in Scope 1 and 2 emissions compared to 2017
Biodiversity	Generate net positive natural capital.	<ul style="list-style-type: none">• Planting programme: number of trees planted from 2021 to 2025: 464,034 (SMP target: 540,000)• Development of projects for "No Deforestation", "Zero Net Loss" and "Net Gain" objectives
Circularity	Have the capability to develop zero-waste projects	<ul style="list-style-type: none">• 16.5% of the resources consumed have been of renewable or recycled origin• The recovery of waste generated has reached 98%
Water	Significantly increase the supply of high-quality water and its sustainable use with cutting-edge technology	<ul style="list-style-type: none">• Atmospheric water collector initiative in India (Tupadahalli)



Exponential leadership

The company leads by example on all business levels. ACCIONA Energía's robust governance enables the company to create innovative solutions focused on having a positive impact.

LEVER	MEANING	PROGRESS 2024
Authenticity	Share the same values and work towards the same goal in each workplace.	<ul style="list-style-type: none"> • <i>Top Employer</i> in Spain, USA, Mexico, Australia, South Africa, Chile and Peru (new country)
Sustainable transformative innovation	Develop an innovative, differential, regenerative value in the company.	<ul style="list-style-type: none"> • All innovation projects incorporate some regenerative vector in their design and implementation. • 100% of the company's facilities have been included in the regenerative performance and impact reporting system.
Governance	ACCIONA Energía's Board will continue to lead this drive, with oversight to ensure the company's mission is met.	<ul style="list-style-type: none"> • The percentage of female directors on the Board is 36.36% (considering the vacant position). The Appointments and Remuneration Committee is searching for a suitable candidate to fill the vacancy, in accordance with the applicable regulations and in line with the Board Composition Policy.
Transparency	Undergo constant scrutiny.	<ul style="list-style-type: none"> • Establishment of the Minerva tool for the definition and monitoring of the ESG budget at project level • More information to suppliers on their performance and areas for improvement, through the Supplier Portal and the GoSupply platform

Integrate to transform

ACCIONA Energía has the capacity to create a unique sustainable difference as it has a portfolio of solutions aligned with sustainable transformation.

LEVER	MEANING	PROGRESS 2024
Solution-based approach	The value proposition will be based on integrated infrastructure designed to maximise its contribution to the SDGs.	<ul style="list-style-type: none"> • Development of the regenerative approach to the company's projects.
Sustainable difference in each project	The sustainable difference of ACCIONA Energía is evident in each project.	<ul style="list-style-type: none"> • A regenerative project proposal identified in coordination with ACCIONA Agua.

Regenerative ecosystems	Develop an ecosystem of organisations capable of increasing our capability in terms of regenerative transformation.	<ul style="list-style-type: none">• More than 300,000 people benefited from social impact projects. €3 million of social investment.• Collaboration with benchmarks such as WBCSD, <i>CLG Europe</i> or <i>Climate Pledge</i>, among others.
Impact financing	Maximise the capacity of sustainable financing to bolster the company's value and competitive regenerative advantages in our projects.	<ul style="list-style-type: none">• €5.591 billion in sustainable financing instruments (corporate debt) in 2024• Two Project Finance type II (green financing + local impact KPIs): Cotoperí and Pedro Corto (Dominican Republic)

[Entity-specific] TRANSFORMATIVE INNOVATION FOR SUSTAINABLE DEVELOPMENT

Innovation, as a central pillar of ACCIONA Energía, positions the company as a leader in the area of renewable energies and decarbonisation. This approach allows it to transform the operational, social and environmental challenges of the sector into opportunities to create more efficient, productive and positively impactful solutions for each of its projects.

ACCIONA Energía's innovation model covers all stages of technological maturity and is based on an open, disruptive and digital approach. This facilitates the skills development, products and services designed to build a sustainable, inclusive and respectful future for both communities and the environment in the regions where the company operates.

Our commitment to innovation

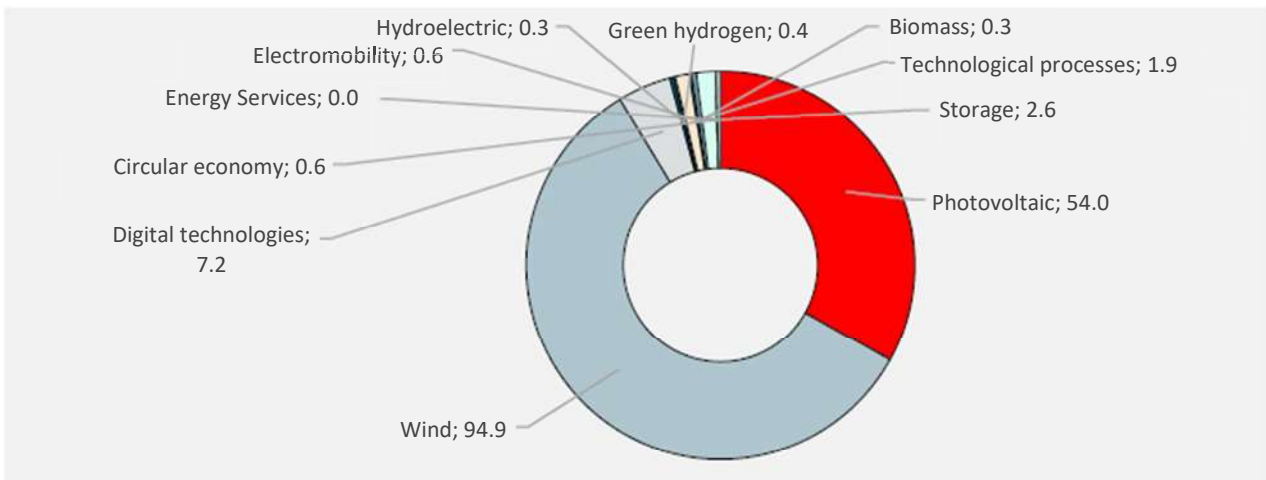
ACCIONA Energía's strategy, put into effect through the Sustainability Master Plan provides an impetus to:

- Regenerative innovation, with particular emphasis on the promotion of social and environmental components.
- Open internal innovation, establishing alliances with new social economy partners that are capable of providing answers to the regenerative challenge.
- Strengthen the development of processes and tools that boost **digital transformation**, especially focusing on the efficiency and management of resources.

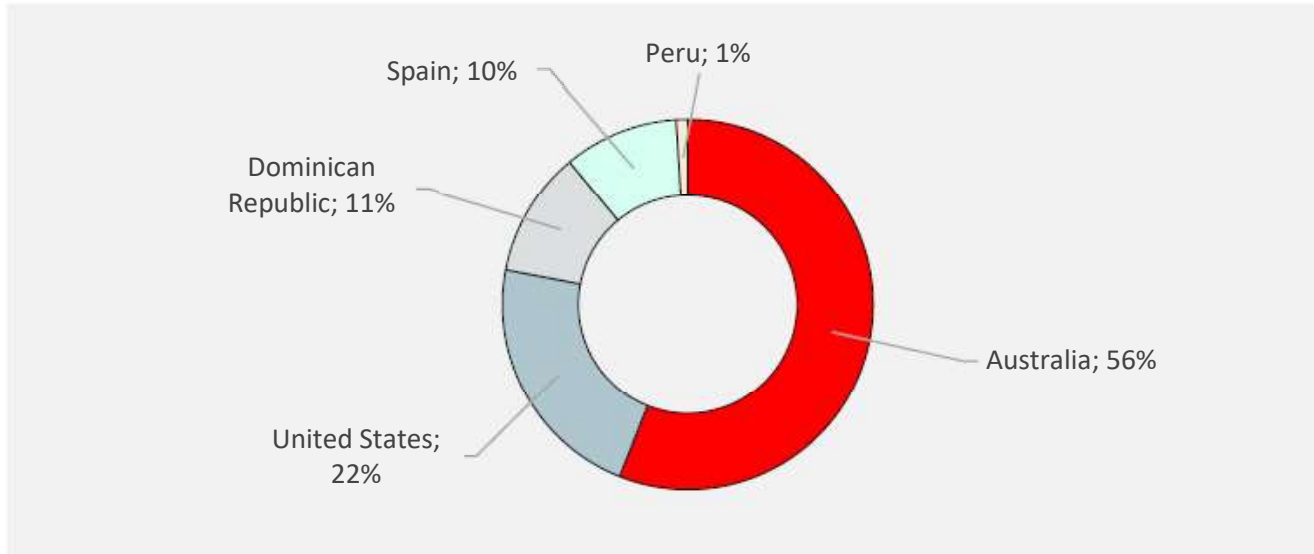
ACCIONA Energía innovation figure

In 2024, ACCIONA Energía reported spending €162.9 million on innovation, 25% more than the previous year. The project portfolio comprises 48 projects. The company carried out four large innovation projects outside Spain worth approximately €146 million, representing 90% of the total innovation figure reported.

Innovation figure per technology



Innovation figure per country



Evolution of the ACCIONA Energía innovation figure

	2020	2021	2022	2023	2024
R&D&i expenditure (€M)	78.3	91.4	103.5	129.7	162.9

Strategic Lines of Innovation

ACCIONA Energía considers it a strategic priority to remain at the forefront of technology in its sectors of activity, seeking to accelerate the changes necessary for sustainable development while simultaneously generating value for the company. Establishing specific objectives and action plans has allowed ACCIONA Energía to successfully work towards fulfilling the company's innovation strategy in 2024.

INNOVATION TO TRANSFORM	ACCIONA ENERGÍA PROJECTS
Renewable gases. Complete development of the green hydrogen ecosystem as an energy vector for the decarbonisation of industry and society, by piloting new business models that integrate the generation of renewable energy and production of green hydrogen and other renewable gases for various uses: self-consumption and industrial decarbonisation, mobility, injection into the grid...	<p>The POWER TO GREEN H2 MALLORCA project is making progress in the development of technological solutions for the different offtakers: hydrogen pipeline, H2 fuel cells, hydrogenerator for heavy and light vehicles, etc. Among the objectives for this year was the development of agreements for the sale of H2 for fuel cells, mobility and blending with different offtakers, aimed at the decarbonisation of sectors beyond electrification.</p> <p>One of the significant milestones in 2024 was the first injection of green hydrogen (from the Lloseta H2 plant) into the Spanish natural gas grid, a historic milestone in the country's energy transition and a revolutionary step towards the decarbonisation of the energy system. The installation located in Palma, run by</p>

	<p>the company Redexis, consists of a 3.2 km hydrogen pipeline and a mixer.</p> <p>The development of the GreenH2Chain platform continues to enable the traceability of renewable hydrogen in all end uses, in accordance with Spanish and European legislation.</p>
<p>Onshore wind. Development of advanced technologies for the design and construction of wind power plants, and for optimising the O&M of wind assets, reducing the LCOE (cost of energy) and increasing the energy produced, without affecting the safety and useful life of the assets.</p>	<p>In 2024, several projects were developed to improve the efficiency, safety or optimise the O&M of wind power plants.</p> <p>From the point of view of optimising the operation of wind power production in existing wind farms, a corrective Yaw misalignment system has been implemented to adjust the power curve and improve the annual production of wind power plants, incorporating ultrasonic sensors. This technology has been installed and the analysis of results begun to assess the impact on production.</p> <p>Regarding the optimisation of wind farm construction methods and their adaptation to larger turbine sizes, a technical-economic study of crane-free systems for the construction and O&M of wind farms was undertaken.</p> <p>In relation to optimising maintenance strategies, critical joints in certain turbine types were analysed to help predict fractures and optimise their maintenance.</p>
<p>Solar photovoltaic. Implementation of new solar photovoltaic technologies in both the construction and design phases, and O&M.</p>	<p>In 2024, emerging photovoltaic technologies that will be commercially scaled up in the coming years were selected for installation and monitoring in 2025 at the Photovoltaic Hub by reaching agreements with suppliers.</p>
<p>Offshore solar PV. Development of advanced floating offshore technologies for the optimisation of the operation and maintenance of solar photovoltaic assets.</p>	<p>A new demonstrator consisting of a membrane flotation technology was installed in 2024. This is the 6th solar field of the Sierra Brava FLOATING PV HUB, and together with the other technologies of the Hub has been the subject of research and analysis for possible scaling for business development.</p>
<p>Storage Hub. Development and validation of technology that makes it possible to integrate and manage storage systems in renewable energy production plants to increase the inclusion of renewable energy in the grid, and also to take</p>	<p>In 2024, work was carried out on the installation and subsequent testing of ultracapacitors at the Tudela photovoltaic and Barasoain wind power plants to evaluate the advantages of hybrid storage with lithium-ion batteries from a technical and economic point of view and to optimise the design of storage systems according to grid requirements and participation in electricity markets.</p>

<p>an active part in supplying energy to the auxiliary grid services.</p>	<p>Progress has been made in the development of a MW-scale battery (2MW - 2 hours) at the Extremadura photovoltaic plant using 2nd life batteries from electric vehicles.</p>
<p>Circular economy. Development of advanced technologies and new uses of materials aimed at promoting the circular economy and sustainability.</p>	<p>The BIOMASS SLAG RECOVERY project continued in 2024 with the construction of a storage platform at the Miajadas biomass plant to validate its use as an aggregate. In addition, a pioneering sustainability solution has been developed by reusing biomass slag for the manufacture of glass containers. This collaboration with Vidrala not only optimises the manufacturing process, but also sets a standard for sustainability in the glass sector. The slag contains a high percentage of silica, a key component in its manufacture. Its reuse has significantly reduced the use of silica sand and replaced part of the sodium carbonate, which optimises the production process and reduces the environmental footprint. The reuse of biomass slag contributes to ACCIONA Energía's objective of giving a second life to the waste and by-products derived from its activity, while promoting the circular economy and reducing CO2 emissions, constituting an example of industrial symbiosis between its businesses. The BIOGLASS project has been funded by CDTI. In 2024, studies were carried out on other potential uses for RECYCLED WIND TURBINE BLADE material.</p>
<p>Innovation to ESG. Solutions are designed and implemented to ensure the sustainability and safety of assets, people and environmental protection.</p>	<p>Systems for the protection of bats and birds have been implemented and monitored in wind farms, selecting various technologies and advanced data processing systems that enable automated turbine shutdowns if necessary.</p> <p>In addition, as part of the evolution of the bird protection project, new technological developments were selected, which will be evaluated according to the results of a Flash test, as a result of which suppliers will be selected to pilot their installation and monitoring in 2025.</p> <p>Another technological line is focused on the implementation of IoT devices for real-time detection of potential risks associated with environmental protection.</p>
<p>Innovation to Mobility. Piloting of new innovative energy solutions for electric mobility and V2X (Vehicle To Grid/Building/...)</p>	<p>The technological solutions implemented in the offtakers participating in the V2G BALEARIC ISLANDS project continue to be monitored and work has begun on scaling V2X solutions (mainly V2G and V2B) with other offtakers and with IKEA, Acciona Recarga's first customer, whose offer includes energy services with V2G technology with 16 two-way charging points with Vehicle to X (V2X) technology, a system that allows two-way</p>

communication between the vehicle and the electrical system, enabling the battery to store energy from the grid to power vehicle traction and to inject it into self-consumption systems or return it to the grid, making the vehicle the electricity supplier.

CROSS-CUTTING INNOVATION

Advanced technologies in operation and maintenance (O&M) Advanced technologies are developed for optimising the O&M of wind, solar and biomass assets.

Innovative Energy Projects

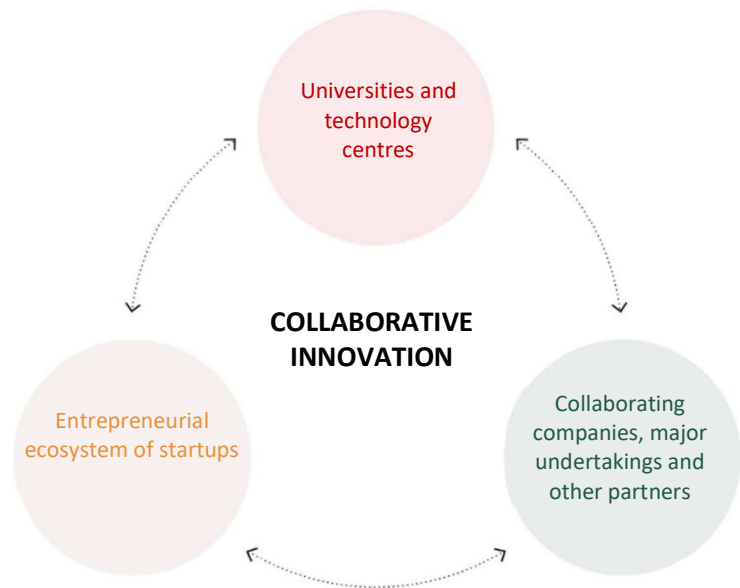
ACCIONA Energía's most innovative projects in 2024 include the installation of a new storage system with recycled batteries at the Extremadura I-II-III photovoltaic plant in Almendralejo (Badajoz), consisting of two containers with a combined capacity of 2MW/5MWh that will enable part of the energy generated by the solar plant to be stored. The batteries used in the project include second-life units from Silence electric vehicles and new batteries from electric cars, a combination that will allow the performance and behaviour of recycled batteries to be analysed in comparison with new ones, contributing to the promotion and advancement of the circular economy.

The Bioglass project is also worth mentioning. In this project, funded by the Centre for the Development of Industrial Technology, biomass slag is used as a secondary raw material in the manufacture of quality glass with a lower carbon footprint, in order to reduce CO2 emissions and the use of virgin raw materials. For its development, ACCIONA Energía has formed a consortium with Vidrala, a national glass manufacturer, for the manufacture of bottles, having incorporated a total of 230 tons of slag from the combustion process of the biomass plant in Briviesca (Burgos), with an installed capacity of 16 MW and an annual production of 128 GWh. The slag has been previously treated and conditioned for use in the manufacturing process of 18.3 million glass bottles at a Vidrala plant located in Llodio (Álava).



Focus on collaborative innovation

ACCIONA Energía's innovation model is based on the company's internal talent and on the international innovation ecosystem to identify, explore and develop the best solutions to the sector's major challenges with the help of startups, technology centres, universities and other external collaborators.



In 2024, the company continued to promote the importance of innovation, to seek out new collaborative opportunities, and to encourage dialogue with stakeholders. ACCIONA Energía promotes a culture of innovation with several of these groups through a variety of different channels and initiatives, with input from the Innovation Department according to the issues addressed.

ACCIONA Energía collaborates with the major universities in the countries where it is present. During the year, the active collaboration with the Universidad Politécnica de Madrid within the framework of the first annual ACCIONA Green Hydrogen Innovation Chair was particularly noteworthy. Among the activities promoted by the Chair, support was given to the development of end-of-degree projects in which internal profiles have been involved as co-tutors, and two technological antennae were activated to explore the state of the art of emerging technologies in the Green Hydrogen value chain. This type of collaboration with the academic world allows us to identify emerging technologies, as well as to establish direct communication with young talent.

In addition, in 2024 ACCIONA Energía consolidated its presence in the national and international Deep Tech ecosystem, participating in international hubs that have allowed us to connect with technology centres and spin-offs developing emerging technologies in different technological areas related to the energy sector. Positioning in the DeepTech ecosystem has allowed us to identify technologies and companies at an early stage, which allows us to analyse growth opportunities for the company that are still in their infancy without any solidly positioned incumbents.

Collaboration programmes and projects are established at the crossroads between the areas of technology interest and the areas of technology competition and developments of those partners.

Partnerships with stakeholders

Among the many and varied dialogue activities carried out in 2024 the following events are worthy of mention:

- VivaTech 2024 (Paris)
- EIC & EuroQuity-Bpifrance Climate Tech Investor Day
- South Summit 2024 (Madrid)
- Energy Tech Summit 2024 (Bilbao)
- S4Industry 2024 (Madrid)
- Mobile World Congress & 4YFN (Barcelona)
- DeepTech Alliance Forum 2024 (Barcelona)
- DeepTech Alliance Explore 2024 (Paris)
- Wind Energy and Market Workshop 2024 - Wind Energy Business Association (Madrid)
- Airborne Wind Energy Conference 2024 (Madrid)
- Wind Europe Annual Event 2024 (Bilbao)
- Floating Offshore Wind Turbines 2024 - Pôle Mer Méditerranée and France renouvelables (Marseilles)
- Intersolar EU 2024 - Solar Promotion Group (Munich)
- The Business Booster 2024 - EIT Innoenergy (Barcelona)

I'MNOVATION

In 2024, a new edition of the I'MNOVATION Programme was launched in which, as a novelty, the call for participation of Technology Centres was opened. ACCIONA Energía launched 5 challenges to the international innovation ecosystem and is co-developing proofs of concept and pilot tests with 6 start-ups and a research centre with the following objectives:

- Design of a solution to improve the seasonal performance of refrigeration installations by remotely and automatically adapting their operation to contextual conditions.
- Design and development of a tool to automatically evaluate and optimise offshore wind farm power evacuation system designs.
- Construction of a solution for the analysis of the health status of wind turbine blades to identify and categorise defects without the need to shut down the turbines.
- Development of a solution to provide very short-term production data that can anticipate a sudden drop or rise in resource caused by clouds undetected by conventional forecasting models.

- Development of a tool to measure and quantify the impact of climate change on the profitability of operating assets and to provide climate intelligence for decision-making.

[SBM-2] RELATIONS WITH STAKEHOLDERS

Communication and constant dialogue are the cornerstones of ACCIONA Energía's relationship with the individuals and organisations who are directly or indirectly involved in the company's business. In short: employees, customers, local communities, suppliers and subcontractors, public administrations and regulatory bodies, shareholders, investors and analysts.

Stakeholder Relations Policy

ACCIONA Energía's Stakeholder Relations Policy aims to foster a culture of continuous dialogue and sustained long-term commitment with its stakeholders, ensuring their participation in the organisation's decision-making process.

The organisation's main stakeholders include its direct staff and those involved in the value chain, together with its trade union representatives, customers and users, local communities, partners, suppliers, contractors, subcontractors, public administrations and regulatory bodies, investors and analysts, the media, associations and civil society organisations, as well as the natural environment and the environment itself.

ACCIONA Energía is a signatory to the commitments of the United Nations Global Compact, and its Stakeholder Relations Policy is aligned with the fundamentals of ACCIONA Energía's Code of Conduct and due diligence process reflected in its Environmental and Human Rights policies, and the main international agreements and conventions, actively contributing to the achievement of the Sustainable Development Goals (SDGs).

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to all employees, suppliers, contractors and collaborators.

The Policy is based on the following principles:

- **Identification and prioritisation of stakeholders:** ACCIONA Energía identifies and prioritises its stakeholders through regular analyses, ensuring that its commitment to them is aligned with the organisation's strategic objectives. This approach provides an understanding of the profile

and needs of stakeholders, facilitating appropriate management of impacts and associated risks, with particular focus on affected local communities and the most vulnerable groups.

- **Prior, free and informed consultation with indigenous communities:** ACCIONA Energía consults and collaborates in good faith with indigenous communities, seeking their free, prior and informed consent in accordance with the International Labour Organization (ILO) Convention 169 on Indigenous and Tribal Peoples.
- **Participation in the strategy:** ACCIONA Energía considers the relationship with its stakeholders to be a fundamental and effective tool, promoting their participation in the processes of defining and executing the organisation's strategy. To this end, it establishes personalised relationships with each stakeholder group, implementing specific collaboration strategies according to their characteristics and needs.
- **Communication and accountability:** ACCIONA Energía offers its stakeholders accessible communication channels, both in format and language, to facilitate the submission of queries, suggestions and complaints, ensuring that all communications are considered and dealt with appropriately. Similarly, ACCIONA Energía communicates in a timely and accurate manner the results, impacts and action plans derived from its relationship with stakeholders, guaranteeing transparency and keeping all those involved duly informed. ACCIONA Energía is also committed to respecting the privacy and protecting the personal data of its stakeholders.
- **Responsibility and non-discrimination:** ACCIONA Energía promotes an inclusive approach, adapted to the needs of its stakeholders. The organisation acts in a responsible manner, guaranteeing respect for the human rights of all its stakeholders.
- **Continuous improvement:** ACCIONA Energía is committed to constantly reviewing and improving its stakeholder engagement models, adapting to changes and emerging needs to ensure sustainable and effective engagement.
- **Dialogue and skills development:** ACCIONA Energía facilitates relations with its stakeholders, providing the necessary means and resources to create suitable spaces for interaction. In addition, it supports skills development to enable stakeholders to participate actively and under appropriate conditions, if required.
- **Training:** ACCIONA Energía encourages the protection and promotion of stakeholder relations, both within the organisation and in its value chain, offering training in this area to employees, suppliers and contractors, in order to promote a culture of dialogue and relations with stakeholders.
- **Collaboration:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies and social organisations, integrating multiple perspectives in its efforts to promote sustainable solutions.

The Stakeholder Relations Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

INTERACTIONS WITH STAKEHOLDERS

STAKEHOLDERS*	MEANS OF COMMUNICATION	2024 HIGHLIGHTS
Employees	E-mail, Intranet, meeting points, surveys, applications, newsletters and corporate videos	PEOPLE Strategy, Health and Safety, general services information and sustainability initiatives
Local communities	E-mail, forms, meetings, helpdesks, suggestion boxes, call centre and project websites	Creation of communication plans, complaints and claims channels, community support, dissemination of information and citizen participation
Customers	Call centre, surveys, e-mail, meetings, sales representatives, incident and user tracking system, Customer Relationship Management System (CEMAR), document management system	Sales process, contract management, technical support, quality and safety of products and services
Suppliers and subcontractors	Supplier mailbox, internal Procure-e system, supplier training channels and supplier portal	Training, human rights, use of procurement tools, and incidents
Public Administrations and regulatory bodies	Public query processes	Regulatory frameworks for renewable technologies, administrative concessions and public procurement
Investors and analysts	Conferences, Roadshows, Reverse roadshows, Results presentations, E-mail and specific meetings	Integration of ESG issues, transparency, sustainable financing and internal carbon pricing
Shareholders	Website, webcasts, conference calls, ACCIONA Group App, social media, e-mail and distribution lists	Decarbonisation targets, directors' remuneration and financial performance
Stakeholder consultations regarding sustainability	E-mail and surveys	Ranking of topics within the sustainability report, usefulness of information and compliance with reporting standards

* For more detailed information on ACCIONA Energía's interaction with its various stakeholders, please refer to the corresponding chapters: S1 Own Workforce, S2 Workers in the Value Chain, S3 Affected Communities and S4 End Customers and Consumers.

Through due diligence processes and the assessment of material impacts, risks and opportunities, ACCIONA Energía has identified and analysed the interests and views of its stakeholders concerning its strategy and business model. This information has made it possible to align the company's strategy with its expectations, identify new business opportunities and identify and mitigate risks associated with operations that may affect stakeholders.

In response to stakeholder views and expectations, ACCIONA Energía has made and will continue to make adjustments to its strategy and business model. For example: ACCIONA Energía has set ambitious targets for reducing emissions and aligning its activity with the EU taxonomy for sustainable activities or has implemented policies and programmes to promote diversity, equality and inclusion in the workplace.

As part of the information necessary for informed strategic decision-making, the company's administrative, supervisory and management bodies are regularly informed about the views and interests of its stakeholders.

[SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

This content is set out in Annex I "Dual Materiality Analysis", and also in each of the SBM-3 sections of the corresponding chapters:

- E1. Climate change
- E4. Biodiversity and ecosystems
- S1 Own workforce
- S2. Value chain workers
- S3. Affected communities
- S4. End consumers and users

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

This content is set out in Annex I "Dual Materiality Analysis", and also in each of the IRO-1 sections of the corresponding chapters:

- E1. Climate change
- E2. Pollution
- E3 Water and marine resources
- E4. Biodiversity and ecosystems
- E5. Resource use and circular economy
- G1. Business Conduct

[IRO-2] DISCLOSURE REQUIREMENTS IN ESRS COVERED BY SUSTAINABILITY STATEMENTS

This content is outlined in Annex III of this document.

2



E1 Climate Change

Governance

Strategy

Impact, risk and opportunity management

Metrics and targets



E1 Climate change

DISCLOSURE REQUIREMENTS

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[E1-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CLIMATE CHANGE AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

ACCIONA Energía has identified and assessed the positive and negative impacts, risks and opportunities related to climate change. In this respect, it has followed a systematic approach in line with the CSRD requirements, details of which can be found in Annex I of this report. The process carried out yielded the following results:

Impacts, risks and opportunities identified



Sub-topic	Upstream Value Chain	Own Operations	Downstream Value Chain
Adaptation to climate change		PI - Resilience to climate change R - Exposure of the company's balance sheet to climate change impacts R - Possible additional expenses to adapt assets to climate change	
Mitigation of climate change		NI - Climate impact of the company's own activities	PI - Decarbonisation of the power supply PI - Providing solutions and services to decarbonise other sectors
Energy		PI - Leading the energy transition PI - Providing new renewable electricity sources PI - Identifying and developing energy efficiency opportunities PI - Providing new charging points (electrified transport) PI - Economic boost and less energy dependence	R - Financial risk if energy transition loses momentum O - Generating new business opportunities in the energy efficiency sector O - Generating new business opportunities in the energy sector

NEGATIVE IMPACTS

One issue has been identified, which is considered material with a potential impact on climate change related to renewable generation activity. The material issue identified would have an impact in the short term and would be generated in own operations.

- **Climate impact of our own activities, mainly due to biomass and solar thermal activities.**

Technologies such as biomass generate emissions during operation. Solar thermal energy also produces emissions from the use of natural gas in the process of preheating the thermal fluid when the ambient temperature is too low.



POSITIVE IMPACTS

A total of 7 issues have been identified, all of which are considered material with a potential positive impact on climate change. Virtually all of the material issues identified would have an impact in the short term and would be generated primarily in own operations and downstream of them.

- **Resilience to climate change**

Renewable energy, such as solar and wind, is not dependent on fossil fuels, but are indigenous and therefore less exposed to disruptions in supply chains due to climate change. In addition, many renewable technologies are scalable and distributed, making them less vulnerable to extreme events, such as hurricanes or floods, compared to centralised generation plants.



- **Decarbonisation of the power supply**

Renewable energies have a much lower emissions intensity compared to other fossil fuel technologies, which enables the decarbonisation of the electricity supply. In addition, renewable technology avoids many more tonnes of CO₂e than it generates in operation.



- **Providing solutions and services to decarbonise other sectors**

ACCIONA Energía's solutions can help decarbonise economic areas that traditionally rely on fossil fuels, such as transport (electric vehicle charging infrastructure) or industry (green hydrogen production). Likewise, energy efficiency makes it possible to reduce consumption and therefore the associated emissions.



- **Leading the energy transition**

As a key player in the renewable energy industry, ACCIONA Energía contributes to the energy transition. Its products and services enable its customers to consume low-carbon electricity in more than 19 countries.



- **Providing new sources of renewable electricity**

The development of more renewable generation projects, with diversified technologies, increases the availability of clean energy, decreasing dependence on fossil fuel sources.



- **Identifying and developing energy efficiency opportunities**

ACCIONA Energía, through its energy services business line, offers services focused on improving the energy efficiency of facilities and production processes, both for public entities and private customers in various sectors and territories.



- **Providing new charging points (electrified transport)**

Through its charging infrastructure network, ACCIONA Recarga serves customers and end consumers, facilitating the transition to electric and therefore cleaner mobility.



- **Economic boost and less energy dependency**

Renewable energies are indigenous and reduce dependence on energy resources from third countries, which helps to reduce the trade deficit. In addition, the construction and maintenance of renewable infrastructure boosts employment and the development of local industry, strengthening the economy and increasing energy autonomy.



RISKS

A total of 4 issues have been identified, of which 3 are considered material risks arising from climate change. Two of the issues are risks in our medium-term operations and the third is an identified downstream risk with a short-term timeline.

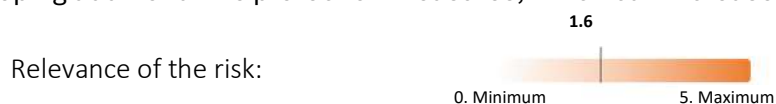
- **Exposure of the company's balance sheet to climate change impacts**

Although renewables are resilient, phenomena such as prolonged droughts can reduce hydropower generation, and extreme weather events can damage wind or solar infrastructure, affecting the company's bottom line.



- **Possible additional expenses to adapt assets to climate change**

Renewable infrastructure must adapt to increased extreme weather events, with adaptive measures such as raising the foundations of wind turbines or photovoltaic modules to mitigate impacts from flooding or developing additional fire protection measures, which can increase operating costs.



- **Financial risk if energy transition loses momentum.**

If the energy transition slows down due to regulatory, economic or social barriers, demand for renewables and other decarbonisation solutions may decrease, affecting the financial profitability of companies in the sector.



OPPORTUNITIES

A total of 4 issues have been identified, of which 2 are considered potential material opportunities on climate change. All of the material issues identified would have an impact in the short term and would be generated downstream.

- **Generating new business opportunities in the energy efficiency sector.**

ACCIONA Energía's Energy Services business line represents an increase in new business opportunities, with public and private customers requiring solutions to monitor and reduce their energy consumption.



- **Generating new business opportunities in the energy sector.**

The energy transition is driving the creation of new technologies and new business models, such as distributed generation, energy communities and storage systems, which are areas of opportunity for the company.



+ More information: [Annex I Dual Materiality.](#)

RESILIENCE ANALYSIS OF THE BUSINESS MODEL AND STRATEGY

ACCIONA Energía continuously assesses the resilience of its business model through dual materiality analysis, annual performance and the management of impacts, risks and opportunities in all its activities and territories. In 2024, 19 potential climate change-related risk events were analysed in our own operations and across the value chain (upstream and downstream). From this assessment, 4 risk situations and 4 potential opportunities have been considered relevant at business level.

The due diligence process defined within the company provides the basis for this assessment. Through this process, ACCIONA Energía identifies, analyses and manages environmental, social and governance risks, ensuring compliance with the applicable regulatory frameworks and alignment with its sustainability strategy.

Climate scenarios defined by decreasing emissions and increasing climate regulation are presented as catalysts for the development of innovative solutions that drive the climate transition and offer medium to long term opportunities in products and services.

In 2024, the analysis of climate risks and opportunities used the same scenarios as in previous years (see section [E1-9]).

The results show a lower exposure to transitional climate risks than to physical risks, with a non-significant financial impact, which demonstrates the robustness of the business model. Geographical diversification and the mix of renewable technologies reduce the overall impact on the asset portfolio.

Risk management is a continuous process. This process is detailed in the sections: [GOV-4], [GOV-5], [E1-1] and [IRO-1].

The company's strategy provides flexibility to adapt the business to different climate horizons, facilitating access to financing and adapting, as far as possible, operations to these scenarios, ensuring a sustainable energy transition aligned with global objectives.

GOVERNANCE

ACCIONA Energía structures its commitment to climate change through a solid and transparent governance model, led at the highest level by its Board of Directors.

The Economic-Financial and Sustainability Division is responsible for managing and reporting to the Audit and Sustainability Committee of the Board of Directors on compliance with climate change strategy and objectives, specifically those established in the Sustainability Master Plan (SMP). The Committee monitors and validates the climate strategy on energy use and production, reduction of Greenhouse Gas (GHG) emissions and management of impacts and risks related to climate change mitigation and adaptation. (More information on Governance at ACCIONA Energía in [GOV-1] and [GOV-2]).

At the same time, the company proactively seeks opportunities arising from the global need for sustainable solutions, continuously developing innovative and climate-responsible practices. This approach not only contributes to decarbonisation, but also opens up new avenues for innovation, financing, growth and increased competitiveness.

To ensure effective follow-up, the Committee's agenda is organised through a scheme of regular reviews and assessments in quarterly, half-yearly and annual cycles.

Quarterly:

- Keep track of the carbon budget (emissions from projects that account for virtually 90% of ACCIONA Energía's total emissions) and of indicators within the ESG budget.

Half-yearly:

- Keep track of the targets for the decarbonisation plan and SMP.
- Verification of compliance with emission reduction targets and the decarbonisation pathway.

Annual:

- Draw up a climate risks and opportunities map.
- Monitoring of the decarbonisation plan and the carbon budget of major projects.
- Analyse internal carbon pricing and its effectiveness.
- Evaluate incentives related to meeting targets.
- Proposal of projects to be financed by the Decarbonisation Fund and selected projects.

[GOV-3] INTEGRATING SUSTAINABILITY-RELATED OUTCOMES INTO INCENTIVE SCHEMES

ACCIONA Energía incorporates climate change considerations in the incentive systems of management and supervisory bodies. These considerations are aligned with the principles of remuneration policy, as described in section GOV-3 of ESRS 2.

This approach ensures that the CEO's performance is evaluated by considering both financial and non-financial results, reinforcing the integration of climate commitments into the business strategy and ensuring that incentives are aligned with the company's long-term decarbonisation objectives.

In addition, the company extends this approach to the entire organisation through the ACCIONA Bonus. This variable remuneration plan is designed to integrate the sustainability strategy across the businesses and countries where the company operates, accounting for 12.5% of the total weight of variable remuneration.

In particular, it includes an annually defined carbon budget compliance target, thus ensuring alignment with the targets set out in the 2025 Sustainability Master Plan.

The ACCIONA Bonus and its specific characteristics are explained in greater depth in chapter S1 Own Workforce of this report, reinforcing the company's commitment to integrate climate performance into incentive systems and strengthen the low-carbon business model.

STRATEGY

[E1-1] CLIMATE TRANSITION ACTION PLAN

ACCIONA Energía's climate agenda is based on three strategic pillars that shape the encompass the company's lines of action and commitments. These pillars, approved and overseen by the company's administrative bodies, seek to ensure that the strategy and business model are compatible with limiting global warming to 1.5°C in line with the Paris Agreement and contribute significantly to having a positive impact on the planet.

1. Business strategy aligned with the EU taxonomy for environmentally sustainable activities

ACCIONA Energía aligns its business strategy with the EU taxonomy for sustainable activities, ensuring

that its investments and operations comply with the sustainability criteria defined in this framework. This alignment allows us to demonstrate our contribution to the energy transition, increasing the confidence of investors and financiers.

Since the construction of its first wind farm more than thirty years ago, ACCIONA Energía has only developed renewable energy projects and solutions for decarbonisation, with no links to fossil fuel power generation.

To ensure compliance with this strategy, the company assesses each business opportunity for eligibility according to the EU taxonomy and reports to the investment approval committee. ACCIONA Energía has set itself the target of investing more than 95% of its investment (CapEx) in activities and projects aligned with climate change mitigation and adaptation objectives.

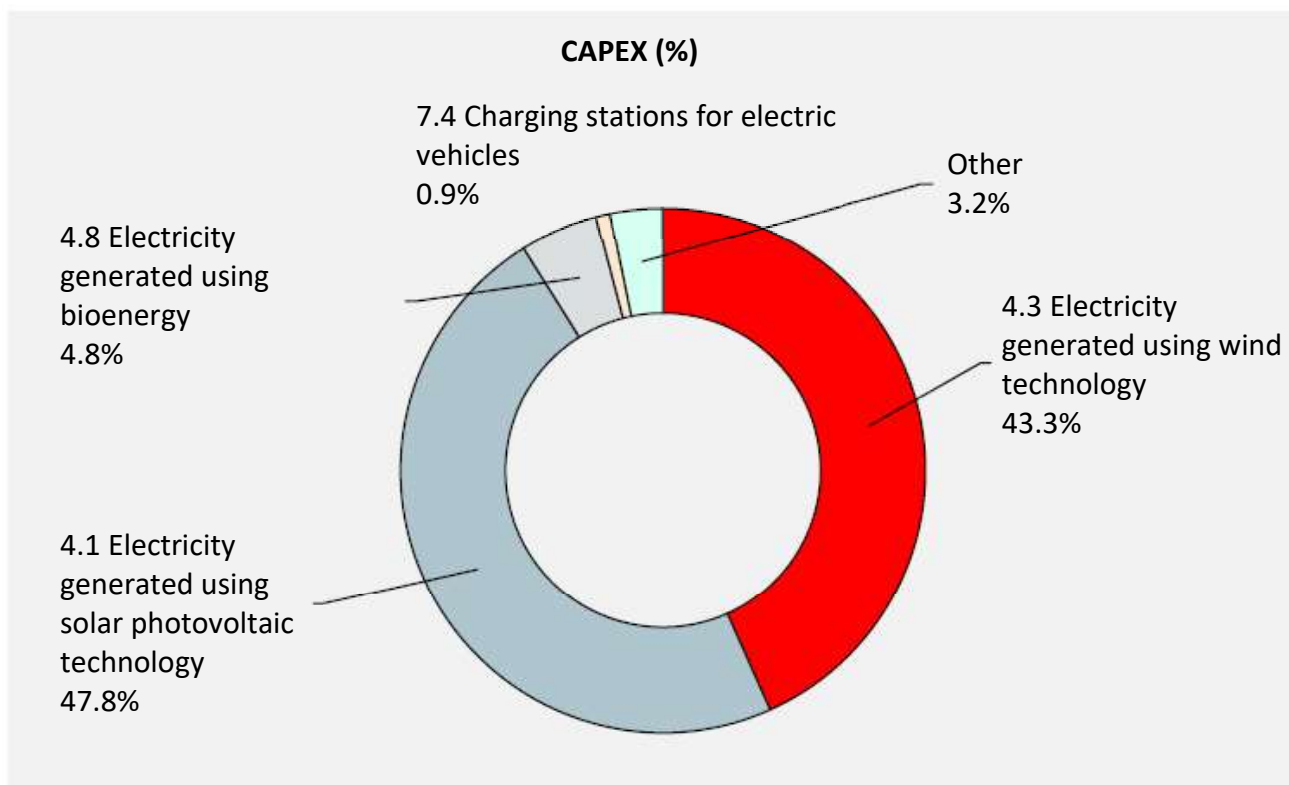
Climate adaptation and mitigation included in Delegated Regulation (EU) 2021/2139 & Delegated Regulations (EU) 2023/2485

		2024			
		TOTAL	ELIGIBLE	ALIGNED (OUT OF ELIGIBLE FIGURE)	ALIGNED (OUT OF TOTAL)
CAPEX	%	100%	99%	100%	99%
	€	1,754,426,249	1,731,726,265	1,731,223,339	1,731,223,339
OPEX	%	100%	97%	98%	95%
	€	126,390,248	122,089,075	120,067,748	120,067,748
SALES	%	100%	54%	98%	52%
	€	3,048,261,132	1,638,507,552	1,599,657,648	1,599,657,648

The percentage distribution of the activities included in the aligned CapEx with regard to the eligible figure specifically oriented to climate change adaptation and mitigation objectives is detailed below:

ACCIONA Energía's activities aligned with the mitigation and adaptation objectives of the taxonomy

The representation of the CapEx figure aligned with climate change mitigation and adaptation targets is consistent when using the list of activities listed in Delegated Regulation (EU) 2021/2178 and when using the list completed by Delegated Regulation (EU) 2023/2585.



The methodology for the calculation and breakdown of data according to Annex II of Commission Delegated Regulation (EU) 2021/2178, of 6 July 2021, is contained in the Annexes section herein.

2. Emission reduction pathway

ACCIONA Energía's emission reduction pathway is aligned with the Science Based Targets (SBTi) global initiative, and is compatible with the Business Ambition 1.5°C to avoid a global average temperature increase above 1.5°C and with Net Zero Carbon. (More details on ACCIONA Energía's SBTi decarbonisation targets in section [E1-4]).

ACCIONA Energía's climate change mitigation actions (More information in [E1-3]) are based on the key decarbonisation levers chosen to address the strategy. These levers are:

- Monitoring of relevant environmental variables of projects under development. In the case of GHG emissions, using the Weighted Average Carbon Intensity (WACI) corresponding to similar projects in the company's history, the level of potential emissions of each project is predetermined, and depending on the result, guidelines or recommendations for action are established (renewable energy consumption, use of materials with a lower carbon footprint, etc.).

Scope 1+2 emissions (tCO ₂)		Weighted Average Carbon Intensity (tCO ₂ e/€M)		
2025 Budget	2024	2024	2023	% VAR.
16,325	12,765	4.2	3.3	26%

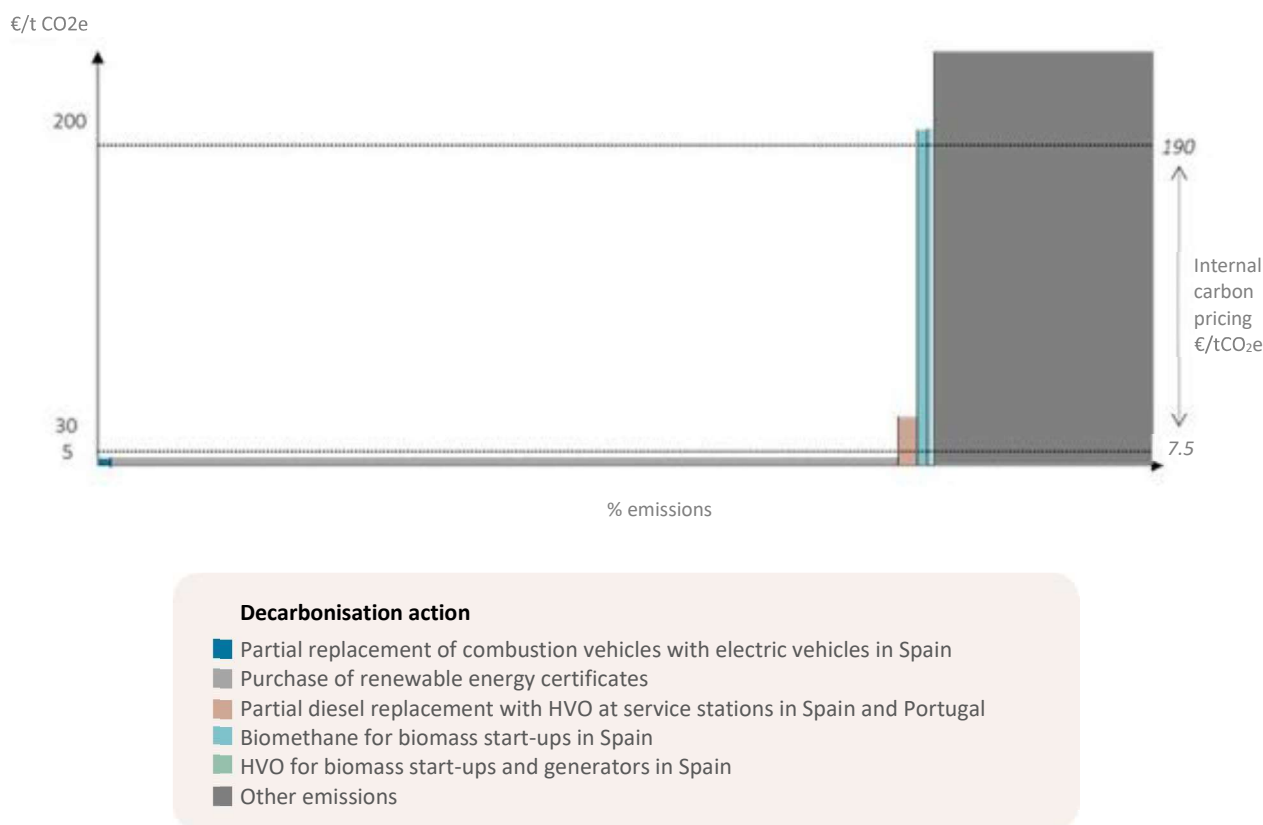
- Allocation of a carbon budget at project level. The emissions generated are taxed at the end of the year with a variable internal carbon price depending on performance: each tonne of CO₂e within the budget limit contributes €7.5. If the tonnes exceed the annual budget but do not compromise ACCIONA's global objectives, a proportional price between the minimum and maximum price is applied. If the tonnes exceed the budget and also compromise ACCIONA's objectives, they are taxed at the maximum price of €190. The total amount accumulated through the application of internal carbon pricing is used to purchase and cancel carbon credits (as many as there are Scope 1 and Scope 2 emissions in the year) for carbon neutrality and to finance decarbonisation projects through the creation of ACCIONA's decarbonisation fund. (For more information on the internal carbon pricing system, see section [E1-8]).
- The implementation of an Incentive System linked to decarbonisation objectives that applies to all employees with the ACCIONA Bonus variable remuneration scheme, whereby 12.5% of the achievement of objectives is evaluated in terms of Sustainability. The emissions reduction target is included in the definition of the ESG budget, which represents 40% of the sustainability objectives. (More information on the sustainability-linked incentive scheme can be found in section [GOV-3]).

As part of its decarbonisation strategy, ACCIONA Energía carries out a specific annual study of the cost of reducing its carbon footprint, in order to identify optimal solutions based on their technical and economic viability. This analysis facilitates the optimal planning of emission reduction measures, prioritising those with the lowest abatement cost and the highest climate impact.

The study not only incorporates an assessment of the effectiveness of each mitigation action, but also considers the associated transition risks, such as the adoption of low-emission technologies, the replacement of products or services, and the return on investment over time.

With this approach, ACCIONA Energía ensures that its strategic decisions on decarbonisation are geared towards efficient resource and risk management, driving a progressive and sustainable reduction in emissions from its main emission sources in all its operations.

3. ACCIONA Energía's emissions abatement cost study



The graph illustrates the abatement cost in euros per tonne, which means the cost associated with avoiding the emission of one tonne of CO₂e through different emission reduction alternatives.

- Vertical axis (€/tCO₂e): It represents the cost per tonne of CO₂e avoided, highlighting how the price varies depending on the emitting source and the alternative used.
- Horizontal axis (% emissions): Shows the cumulative percentage of the company's total emissions in 2024.

Coloured regions (bars): Each bar represents a decarbonisation performance analysed:

- Height of the bars: Reflects the cost per tonne of abatement.
- Bar width: Indicates the percentage of emissions that this source represents in the total.

4. Contribute to the transformation of the global economy.

ACCIONA Energía actively promotes the integration of climate change into public policies and the transition to a low-carbon economy, promoting dialogue with key stakeholders and encouraging the adoption of regulatory frameworks that accelerate global decarbonisation.

The company advocates the need to increase the use of renewable energy, establish a global carbon price that internalises environmental costs, and mobilise specific funds for climate adaptation and a just energy transition, especially in developing countries.

ACCIONA Energía also actively participates in climate transition benchmarks for portfolios and investment products, supporting the development and consolidation of the EU taxonomy for sustainable activities as a key mechanism to ensure accountability and facilitate the alignment of

investments with long-term environmental objectives. (More information on benchmarks can be found in Chapter X. Sustainable Finance)

Through its participation in international forums, strategic partnerships and the dissemination of knowledge, ACCIONA Energía reinforces its commitment to structural change in the global economy to ensure sustainability and resilience in the face of climate challenges. The main lines of work for ACCIONA Energía's Climate Policy Advocacy are set out below:

- **Commitment to Climate-Related Regulations:** ACCIONA reaffirms its leadership in the climate transition by supporting ambitious regulations that accelerate global sustainability. In February 2023, the company took a step forward under the EU Emissions Trading Scheme (EU ETS), advocating in a joint letter for the removal of references to fossil fuel combustion in sectoral benchmarks. This drive towards a more decisive transition was also reflected in May 2022, when CEO and Chairman José Manuel Entrecanales Domecq expressed strong support for the renewed ambition in the EU's Renewable Energy, Energy Efficiency and Energy Performance of Buildings Directives, highlighting their central role in the energy transformation.

ACCIONA is also extending its commitment beyond Europe. In November 2021, the company participated in the public consultation for the revision of the EU Renewable Energy Directive, supporting its update, but raising the need to exempt existing bioenergy plants from the proposed new sustainability criteria, and in July 2022, it joined a joint letter to lawmakers in the US advocating a comprehensive climate package including specific measures to boost clean energy. In May 2023, ACCIONA took another key step in its commitment to decarbonisation by submitting comments to the European Commission on the reform of the EU Electricity Market Design. In them, it stressed the importance of policies that accelerate the integration of renewable energies, reinforcing its role as a key player in the energy transition. These initiatives demonstrate a strategic vision that connects local and global action, supporting regulatory frameworks that not only meet climate goals, but also scale them up to ensure a sustainable future.

- **Positioning on Energy Transition:** ACCIONA stated that, the development of clean energy is “vital to combat climate change” and supported the widespread adoption of renewable energy to combat this problem by advocating the revision of the EU Energy Taxation Directive in November 2021 in its comments to the EU Commission, supporting linking taxation to the energy content and environmental performance of energy products. Acciona's comments to the EU Commission in April 2022 called for an accelerated approval process for the permitting of renewable energy infrastructure in the EU. In February 2023, the company strongly supported the EU Green Deal Industrial Plan in response to the US IRA, calling for the implementation of ambitious EU legislation as well as the elimination of fossil fuel subsidies.
- **Governance of Industry Associations:** ACCIONA Energía publicly participates in sectoral associations that advocate climate transition. Although the company has not formally stated its degree of alignment with the climate policy positions of such associations, the company deliberately participates in industry associations that traditionally take positive positions on the transition from fossil fuels to renewable energy sources, such as the Clean Energy Council (Australia), WindEurope and the Solar Energy Industries Association.

STRATEGIC TOPICS IN 2024	Description	Mention on main website and in other media	C-suites participation in a specialised forum	Direct consultation with governments	Collaboration with ad-hoc organisation
Balancing generation, grid infrastructure development and renewable energy demand	Promoting the implementation of regulatory frameworks and policies that boost the generation, distribution and demand for renewable energies, highlighting the need to strengthen electricity grids and electrify key sectors for an effective transition. In line with the commitment made at COP28 to triple installed renewable capacity by 2030, ACCIONA Energía promotes measures to facilitate the integration of new clean energies in markets where demand growth is limited. It also advocates phasing out thermal generation and strengthening industrial electrification through incentives and fiscal mechanisms to reduce dependence on fossil fuels. The company also pushes for regulatory harmonisation in the EU, ensuring that the expansion of renewable energy is backed by a stable and efficient regulatory framework.	•	•	•	World Economic Forum, First Movers Coalition, We Mean Business Coalition, IRENA
Decarbonisation of the supply chain	Decarbonisation in hard-to-abate sectors and that are part of its value chain. Specifically, it promotes the adoption of frameworks and measures to incentivise the production of low-carbon cement and steel, which remain less competitive than their conventional counterparts due to high production costs in the face of emerging technologies and low demand.	•	•		WBCSD, Alliance of CEO Climate Leaders (WEF)
Adaptation to climate change	Promoting regulatory, policy and financial frameworks that give climate adaptation a balanced position on the global agenda where mitigation has predominated and extreme weather events are becoming more frequent and intense.	•	•	•	WBCSD
Transparency and disclosure of climate information	Promoting non-financial disclosure regulations both directly and through its member associations such as the CSRD and CSDDD. In line with its commitment to transparency, the company moved forward with the implementation and disclosure of the CSRD by reporting according to its standards in 2023. In addition, ACCIONA encourages the development of global disclosure standards that are comprehensive and interoperable with other international reporting systems, such as the TCFD or more recently the TNFD. Its approach seeks to balance ambition in accountability with reducing duplication of reporting requirements, optimising the efficiency and consistency of regulatory frameworks across jurisdictions.	•	•	•	WBCSD (Reporting Matters), Corporate Leaders Group, UN Global Compact, B Team

ACCIONA Energía's Climate Transition Action Plan reflects the company's commitment to a business model that actively contributes to decarbonisation and climate adaptation. Its implementation is adapted to the evolving regulatory, financial and technological context, ensuring effective integration into strategic and operational planning.

Through a dynamic approach based on impact measurement, resource optimisation and innovation, ACCIONA Energía continues to make progress in implementing its climate strategy, consolidating its position in the transition to a sustainable economy and aligning itself with global carbon neutrality targets.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy and is developed in accordance with the guidelines established by due diligence (set out in GOV-4). Based on the material issues resulting from ACCIONA Energía's Materiality Analysis, the potential situations of impact, risk and opportunity are expanded and evaluated exhaustively, enabling the management and remediation of those that exceed the tolerance thresholds classified as acceptable.

Climate change aspects are integrated into the ESG Risk and Impact Management Procedure in such a way that all projects are assessed in terms of exposure (likelihood) and vulnerability (economic consequence) for risk situations and in terms of exposure (likelihood) and magnitude (severity) for environmental impact situations.

This procedure is carried out annually and results in the categorisation and prioritisation of risk and impact situations, which are analysed in order to implement mitigation and remediation measures if necessary. This reduces the exposure and vulnerability of different locations and supply chains to extreme weather events, legislative changes, etc. (More information on risk management governance and internal controls on sustainability in [GOV-5]).

The identification of climate change related impacts is based on the emission of Greenhouse Gases (GHG) in ACCIONA Energía's projects and activities. Those projects with the highest GHG emissions will assess their performance in detail, demonstrating an action plan according to the guidelines established by the mitigation hierarchy and taking into account current and future emissions in the value chain through projection and simulation tools.

These emissions may adversely affect the global objectives of maintaining the global average temperature, the degradation of biodiversity, as well as the well-being of local communities, etc. ACCIONA Energía also considers the emissions derived from the company's supply chain to be an adverse effect, which is an impact factor identified and evaluated within its environmental management system.

ACCIONA Energía does not operate in sectors associated with the generation of relevant emissions in terms of land use change, so this source of emissions is not a relevant aspect when assessing potential climate change related impacts.

In the methodology for identifying, assessing and managing climate risks and opportunities, various tools are used to monitor exposure to both physical and transitional climate variables based on historical models projected in different climate scenarios and with different timelines for all ACCIONA Energía centres.

The climate scenarios used are based both on those developed by the Intergovernmental Panel on

Climate Change (IPCC), which include trajectories ranging from moderate temperature increases to extreme warming scenarios (above 3°C), showing different levels of physical risk from increasingly intense weather events, as in those projected by the Network of Central Banks and Supervisors for Greening the Financial System (NGFS) that envisage more or less abrupt transitions towards low-carbon models, assessing macroeconomic and financial factors, as well as the resilience of the most exposed sectors.

In this way, and given ACCIONA Energía's global and diversified presence, the strategy is adapted to the most demanding environments, guaranteeing solid planning and a risk assessment aligned with its commitment to sustainability, prioritising the scenarios that reflect the greatest risks, both physical (floods, droughts or other extreme phenomena) and transitional (rising carbon prices, accelerated legislative changes, lack of investor and customer preference for sustainable projects).

With regard to timelines and in accordance with the guidelines established in the Risk Management System, the company's global framework, the type of activities and the useful life of the company's assets, it is established that the short term corresponds to periods of less than one year, mainly in relation to services. The medium term is considered for projections of more than one year and less than five years, aligned with the frequency of the Sustainability Master Plan and including most of the construction activities of renewable generation projects. Finally, the long term covers five years and beyond, incorporating global observations and trends and focusing on activities more closely linked to projects and facilities in operation.

In addition, all the company's assets are evaluated according to their geographical location, taking into account: production variables; financial variables; project emissions; energy consumption; climate policy references; references to presence in carbon markets; identification of activities set within the EU taxonomy for sustainable activities and legal requirements.

This procedure makes it easier to consult and construct scenarios and specific situations related to climate change based on risk and opportunity issues. The process is based on:

1. Designation and configuration, from the Sustainability Division, of an assessment group made up of experts who analyse risk and opportunity situations related to climate change.
2. By using the above-mentioned tools, the assessment group broadens and specifies the set of risk and opportunity situations according to geographical location and type of activity carried out, so as to obtain a representative sample of potential risk situations and opportunities for each project and/or group of projects.
3. Once defined, each climate risk situation will be assessed, according to a combination of:
 - Likelihood
 - Economic-financial consequence
 - Reputational consequence
 - Company capacity to manage the risk
 - Risk management established by the company
4. Graphical representation of risk situations that exceed the tolerability thresholds before implementing any management in the Climate Risk Map. The transposition of the risks identified to ACCIONA Energía's Risk Map requires reviewing the economic-financial impact to adapt its degree of representation to the company's global figures.
5. These risk situations require the creation of specific treatment sheets that inform the company's decision-making bodies about the risk mitigation, adaptation, transfer or acceptance options and their estimated cost.
6. The treatment sheets not only act as management documents, but are also intended as consultation tools. To this end, they are systematically collected and recorded to form an information base that allows the most appropriate management decisions to be taken in each case for each risk.
7. Finally, the complete results are integrated into ACCIONA Energía's general Risk Management



System and are submitted to the Board of Directors through the Audit and Sustainability Committee to determine whether the level of risk is tolerable following the governance previously presented ([GOV-5]).

The rating criteria for the indicators mentioned in point 3 identifying scenarios and situations of risk and opportunity related to climate change are detailed below. These are common to any risk assessment and management process carried out at ACCIONA Energía.

Indicator	Score	Quantitative scoring	Criteria
Exposure (Likelihood)	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1-5]	Percentage drop in sales / EBITDA / EBT.

[E1-9] ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL PHYSICAL AND TRANSITION RISKS AND POTENTIAL CLIMATE-RELATED OPPORTUNITIES

Based on the Sustainability Risk Management System, ACCIONA Energía has analysed the potential financial effects of risk situations and opportunities associated with climate change. In order to present this content in a more logical and coherent way, the initial table of contents has been modified, placing the section under “Impact, risk and opportunity management” - instead of “Metrics and targets” as suggested by the ESRS E1 standard - so that the risk and opportunity analysis methodology is described first, and then the results are presented.

Analysis of the physical and transitional risks arising from climate change

No.	Countries	Scenario / timeline	Category and Subcategory	Description	Exposure	Vulnerability	Risk management
1	Spain	NGFS: Current Policies / IPCC: RCP6.0 Assessed for 2050	Physical risk: Chronic	Decrease in electricity production from Spanish hydropower plants due to reduced run-off and reduced optimisation of production due to seasonal variation.	Likely (4) Proportion of assets represented: 14.7%	Slight (Decrease in sales from 0.5% to 0.25%)	The geographical and technological diversification of ACCIONA Energía's energy activity mitigates the impact of this risk. Reservoir management with weather forecasting for improved planning and management. Establishment of monitoring and control tools for potential changes in seasonality and production and sale.
2	All countries where it operates	NGFS: Current Policies / IPCC: RCP6.0 Assessed for 2050	Physical risk: Chronic	Decreased revenues due to reduced efficiency of PV panels in the face of global temperature increases.	Possible (3) Proportion of assets represented: 13.6%	Negligible (Sales decrease of less than 0.25%)	The geographical diversification of ACCIONA Energía's energy activity mitigates the impact of this risk.
3	All countries where it operates	NGFS: Current Policies / IPCC: RCP6.0 Assessed for 2050	Physical risk: Chronic	Decreased revenue given a drop in wind and solar power production due to changes in wind and temperature patterns and flood frequency.	Possible (3) Proportion of assets represented: 84%	Significant (Decrease in sales from 1.25% to 0.5%)	The geographical diversification of ACCIONA Energía's energy activity mitigates the impact of this risk.
4	All countries where it operates	NGFS: Current Policies / IPCC: RCP6.0 Assessed for 2050	Physical risk: Severe	Reduced production capacity and higher operating costs due to temporary shutdowns to repair damage caused by extreme weather events (cyclones, hurricanes, floods).	Possible (3) Proportion of assets represented: 84%	Negligible (Sales decrease of less than 0.25%)	The geographical diversification of ACCIONA Energía's energy activity mitigates the impact of this risk. Insurance is taken out to cover, among other things, the risk of extreme events, with an impact on both wind and photovoltaic assets.

5	Spain	NGFS: Current Policies / IPCC: RCP6.0 Assessed for 2050	Physical risk: Chronic	Decrease in electricity production due to temporary shutdowns due to limitations in the cooling of those thermal plants that do not have a catchment basin and are therefore affected by droughts and variations in rainfall patterns.	Unlikely (2) Proportion of assets represented: 1%	Slight (Decrease in sales from 0.5% to 0.25%)	The installation of catchment basins and systems for the recycling and recirculation of existing plants, as well as the establishment of adaptation measures in new plants and studies in the design phase would reduce the impact of restrictions due to rainfall patterns.
6	All countries where it operates	NGFS: Disorderly transition / IPCC: SSP2 Assessed for 2030	Transitional risk: Markets	Changes in the mix and sources of income, with a consequent decrease in income due to a relaxation of the objectives and targets defined by the European Union in the framework of the Green Deal and Energy Efficiency that would reduce the need for the services offered.	Unlikely (2) Proportion of assets represented: 84%	Negligible (Sales decrease of less than 0.25%)	ACCIONA Energía participates in associations that promote and defend energy transition policies within the framework of the Green Deal.
7	Spain	NGFS: Disorderly transition / IPCC: SSP2 Assessed for 2030	Transitional risk: Markets	Changes in the mix and sources of income, with a consequent decrease in income due to a relaxation of the objectives and targets defined by the European Union in the framework of the Green Deal and Electric Mobility that would reduce the need for the services offered.	Unlikely (2) Proportion of assets represented: 71%	Negligible (Sales decrease of less than 0.25%)	ACCIONA Energía participates in associations that promote and defend electric mobility measures (AEDIVE)
8	Spain	NGFS: Disorderly transition / IPCC: SSP2 Assessed for 2030	Transitional risk: Markets	Changes in the mix and sources of revenues, with a consequent decrease in revenues due to a relaxation of the objectives and targets defined by governments in the framework of the Green Deal and Green Hydrogen.	Unlikely (2) Proportion of assets represented: 71%	The economic and financial impact of this risk on ACCIONA Energía is very low, as it is an incipient business.	ACCIONA Energía has consolidated its strategy of growth and leadership in energy transition by investing in innovation for energy solutions within its customers' facilities, as well as expanding its service to new markets and countries.

Analysis of the opportunities arising from the climate transition

No.	Scenario / timeline	Category	Description	Global context	Type of Impact	Opportunity management
1	NGFS: Net Zero 2050 / IPCC: SSP2 - Middle of the Road (RCP 4.5) Assessed to 2050	Products and services	Increased revenue from increased demand for renewable energy technologies.	The growing demand for renewable generation technologies is driven by accelerating decarbonisation commitments, significant decreases in the levelised cost of energy (LCOE) and increased demands for climate regulations and ESG investment criteria. By 2030, renewables are expected to account for 90% of new installed energy capacity, with solar and wind power capturing more than 70% of global electricity generation by 2050.	Increase in revenue (very high)	ACCIONA Energía maintains its strategy of expanding its capacity to generate renewable energy in a flexible manner over time, making the most of the opportunities available at the time. This strategy of continued expansion will boost revenue. In 2024, 2 GW of capacity was installed.
2	NGFS: Divergent Net Zero / IPCC: SSP1-1.9 - Taking the Green Road Assessed to 2030	Products and services	Higher demand for energy services by industrial and municipal clients.	Tighter regulations, such as the EU Energy Efficiency Directive and emission reduction programmes in the US and China, are accelerating the adoption of efficiency solutions in sectors such as construction, industry and transport. By 2030, energy efficiency is expected to account for 40% of the total emissions reductions needed to meet climate targets, with annual investments exceeding USD 600 billion. (International Energy Agency (IEA), 2023).	Increase in revenue (medium)	ACCIONA Energía has consolidated its strategy of growth and leadership in energy transition by investing in innovation for energy solutions within its customers' facilities, as well as expanding its service to new markets and countries.
3	NGFS: Divergent Net Zero / IPCC: SSP1-1.9 - Taking the Green Road Assessed to 2030	Products and services	Industrial and municipal customers demand new charging points for electric cars.	According to the 'Global EV Outlook 2024' report by the International Energy Agency (IEA), the number of public charging points for electric vehicles increased by 40% in 2023 compared to 2022. However, to meet government targets, charging networks will need to increase six-fold by 2035.	Increase in revenue (medium)	Gradual expansion of ACCIONA Recarga's business presence. Charging stations represented 1% of the aligned CapEx in 2024.

4	<p>NGFS: Divergent Net Zero / IPCC: SSP1-1.9 - Taking the Green Road</p> <p>Assessed to 2030</p>	<p>Use of new technologies</p>	<p>Increased revenues from the introduction of new renewable generation sources.</p>	<p>Annual low-emission hydrogen production could reach 38 Mt by 2030. (IEA, 2023) Executive summary - Global Hydrogen Review 2023 - Analysis - IEA.</p>	<p>Increase in revenue (medium)</p>	<p>The development of green hydrogen, as a low-carbon energy source obtained by electrolysis using renewable electricity, is less susceptible to transitional risks and is being driven by public climate policies.</p>
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[E1-2] CLIMATE CHANGE POLICY

CLIMATE CHANGE POLICY

PURPOSE

ACCIONA Energía's Climate Change Policy establishes the framework for managing the transition strategy towards more efficient practices, driving the Organisation's climate action. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to both climate change mitigation and adaptation.

ACCIONA Energía considers it a priority to lead the energy transition and invest in business models for decarbonisation, aligning itself with global efforts to limit the increase in the planet's average temperature to 1.5°C by 2050. Through its projects, products and services, the organisation actively contributes to the mitigation of climate change, promoting an effective reduction of greenhouse gas emissions through the production of energy exclusively from renewable sources and the development of technologies and services for the decarbonisation of its customers, also establishing strategies for adapting to climate change.

ACCIONA Energía's Climate Change Policy is aligned with the main international agreements and conventions on mitigation and adaptation, contributing to the commitments of the Paris Agreement, the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

SCOPE

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

PRINCIPLES

ACCIONA Energía's Climate Change Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models, even in locations where there is no regulatory framework in this regard.
- **Damage prevention:** ACCIONA Energía is committed to avoiding, preventing and mitigating the adverse effects caused by its activities, through the development and use of renewable energies and clean technologies.

- **Climate leadership:** ACCIONA Energía leads the fight against climate change, developing solutions for the decarbonisation of the economy. The organisation focuses its investments on activities recognised by the EU taxonomy for sustainable activities.
- **Science-based targets:** ACCIONA Energía sets science-based emission reduction targets that contribute to the objective defined in the Paris Agreement.
- **Net Zero:** ACCIONA Energía is committed to decarbonising its business model, promoting the use of 100% renewable energy sources and optimising energy consumption to meet its Net Zero commitment.
- **Renewable energy:** ACCIONA Energía promotes the development and use of renewable energies, thereby reducing global dependence on fossil fuels and encouraging the electrification of the economy. In this way, it actively contributes to climate change mitigation.
- **Resilient infrastructure:** ACCIONA Energía promotes the development, operation and maintenance of infrastructures adapted to climate change and its effects, enabling an uninterrupted service to its customers and society.
- **Positive impact:** ACCIONA Energía promotes an approach beyond the mitigation of negative impacts, aware of the progressive deterioration of the planet. This approach integrates the entire life cycle of the project, from design to end-of-life, with the aim of generating a positive impact that we call regenerative.
- **Driving mechanisms:** ACCIONA Energía implements a series of internal mechanisms that facilitate the transition to a decarbonised model. These include:
 - **Carbon budget:** ACCIONA Energía allocates carbon budgets to its facilities with significant emissions, establishing an internal price that varies according to the degree of achievement of the company's climate targets.
 - **Decarbonisation fund:** ACCIONA Energía allocates an annual internal fund to finance specific decarbonisation measures in its projects, thus promoting specific initiatives to reduce emissions.
 - **Compensation for climate targets:** ACCIONA Energía has integrated a decarbonisation strategy across the entire organisation, reflected in the annual variable remuneration, thus incentivising compliance with climate targets.
 - **Neutralisation:** ACCIONA Energía, on its path towards Net Zero, promotes the development of projects that capture and permanently store carbon from the atmosphere with the ultimate goal of neutralising the remaining emissions in order to achieve its GHG emissions reduction target and its Net Zero commitment.
 - **Mitigation beyond the value chain:** ACCIONA Energía invests in mechanisms that contribute to the financing and development of projects that reduce greenhouse gas emissions beyond its value chain.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The Climate Change Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

This policy has been approved by the Audit and Sustainability Committee of the company's Board of Directors, the body responsible for defining and overseeing compliance with sustainability policies in the environmental, social and corporate governance areas. This Committee also ensures that these policies are in line with applicable international codes and references.

ACCIONA Energía's Climate Change Policy derives from the Environmental Policy, which, among other things, establishes the mechanisms necessary to implement the due diligence process in ACCIONA Energía's operations. These mechanisms include the identification, assessment, management and remediation of dependencies, impacts, risks and opportunities related to key sustainability aspects of climate change.

In addition, ACCIONA Energía defines specific steps to manage the physical and transitional risks associated with climate change, covering both the direct consequences of the phenomenon and those derived from the economic environment. This ensures that its operations and value chain are aligned with international best practices, protecting the environment and human rights, and actively contributing to climate change mitigation and adaptation.

ACCIONA Energía considers it a priority to lead the transition to a low-carbon future, aligning itself with global efforts to limit the increase in the planet's average temperature to 1.5°C by 2050. Through its projects, products and services, the company actively contributes to climate change mitigation, focusing its efforts on the effective reduction of greenhouse gas (GHG) emissions. This commitment is put into practice mainly through the generation of renewable energy.

ACCIONA Energía's Climate Change Policy is based on twelve key principles. These principles are complemented by internal mechanisms, such as the allocation of carbon budgets to facilities with significant emissions, an internal fund to finance specific decarbonisation measures, and the integration of climate targets in the annual variable remuneration, thus incentivising compliance. Mitigation beyond the value chain is also promoted through investments in projects that help reduce greenhouse gas emissions.

The Climate Change Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which the company operates.

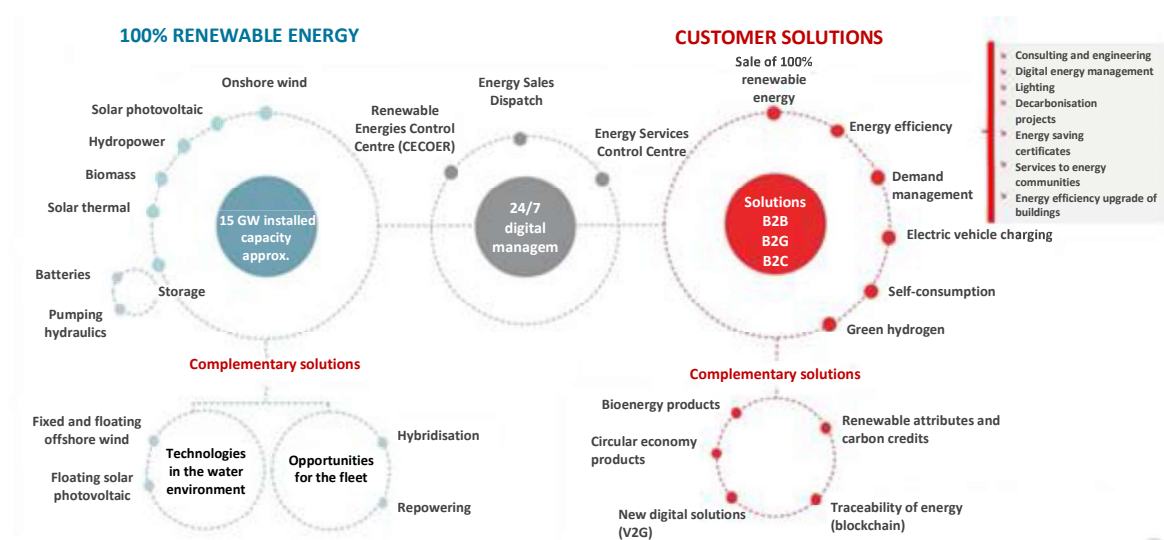
+ More information: [Annex IV and in: ACCIONA Energía's Climate Change Policy:](#)

[E1-3] ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

Decarbonisation solutions for the value chain

ACCIONA Energía's commitment to decarbonisation and the energy transition is put into practice by the trading of 100% renewable energy, backed by certifications of origin such as those granted by the CNMC in Spain, IRECs in Mexico and EEGO in Portugal. This approach not only ensures regulatory compliance, but also positions ACCIONA Energía as a global leader in renewable energy, in line with the "Climate Leadership" and "Net Zero" principles described in the Climate Change policy.

ACCIONA Energía's portfolio of services includes the sale of 100% renewable energy, energy efficiency solutions, demand management, electric vehicle charging infrastructure, self-consumption and technologies such as green hydrogen. These solutions, designed for B2B, B2G and B2C customers, not only promote carbon footprint reduction, but also foster the electrification of the economy and the resilience of infrastructures to the effects of climate change. In this way, ACCIONA Energía translates the principles of its policy into concrete actions, generating value for both its customers and the communities in which it operates.



ACCIONA Energía structures its decarbonisation strategy in such a way that its actions to address climate change mitigation and adaptation are financed with its own resources. This financial independence allows it to maintain its commitment to the emission reduction targets set by the Science Based Targets (SBTi) initiative, without risk of disruption.

The ability to implement such actions depends, in part, on the allocation of resources from the company's Decarbonisation Fund (more information in section [E1-8] on internal carbon pricing systems). Furthermore, the soundness of this strategy also enables improved financing conditions, reducing the cost of debt. These additional margins increase the positive impact generation capacity of renewable generation projects.

Climate change adaptation actions in ACCIONA Energía’s activities

Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current or future financial resource linkage to financial statements
<div>1. Development of a pilot for the calculation of the physical and economic impact of climate change on assets of different technologies in collaboration with climate scientists specialised in the development of regionalised climate projections.</div> <div>2. Procurement of regionalised climate projection data platforms. The aim is to identify and mitigate risks to the company's asset portfolio and to actively manage them.</div>	Resilient infrastructure: knowing the potential physical and economic effects of climate change on assets allows the company to anticipate its effects by preparing its assets through adaptation measures that increase their resilience to climate change.	Own operations	Present	Financial	€ 117,400



Climate change mitigation actions in ACCIONA Energía's operations

Scope	Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current or future financial resource linkage to financial statements
Scope 1	Use of HVO in vehicle fleets in Spain and Portugal to replace diesel.	Net Zero: Contributes to the decarbonisation of the business model by reducing transport emissions. Damage prevention: Mitigates the adverse effects of fossil fuel use. Science-based targets: Supports emission reductions aligned with Paris Agreement targets.	Own operations	Present-day, Short-term future	Financial	This action is in the implementation phase. Until the end of 2024: €916.34
	Replacement of fleet vehicles with internal combustion engines with all-electric alternatives.	Net Zero: Reduces the use of fossil fuels, promoting 100% renewable energies. Renewable energy: Promotes the electrification of the economy, reducing dependence on fossil fuels. Climate leadership: Promotes concrete solutions for the decarbonisation of the transport sector.	Own operations	Present-day, Short-term future	Financial	This action is in the implementation phase. Until the end of 2024: €366,395
	Increase the accuracy of the calculation of the biomass combustion emission factor through periodic measurement at outflows,	Science-based targets: Improves the accuracy of emissions measurement, facilitating effective GHG reduction.	Own operations	Present	Financial	 € 26,826



	adjusting the combustion parameters for emission reduction.					
	Technical-economic study of the use of alternative fuels for cold starts in biomass plants.	Net Zero: Reduces dependence on fossil fuels, favouring alternatives with a lower environmental impact.	Own operations	Present-day, Short-term future	Financial	€20,700
Scope 2	Replacement of electricity from the country's electricity mix with electricity from renewable sources, either through direct contracting or through the purchase of renewable certified attributes (GdOs, IRECs, REC's, LGC's).	Renewable energy: Ensures the use of 100% renewable electricity in operations	Own operations	Present	Financial	€216,449
Scope 3	Use of green concrete for wind turbine foundations in the repowering of the Tahivilla wind farms (Spain)	Resilient infrastructure: Building of wind farms with a lower life cycle carbon footprint.	Own operations	Short-term future	Financial	€1,565,788



Climate change mitigation actions for ACCIONA Energía customers and consumers

Scope	Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current or future financial resource linkage to financial statements
Scope 1	Feasibility study for biogenic CO ₂ capture and methanol production with green hydrogen	Net Zero: Explores solutions to exploit emissions, capturing biogenic CO ₂ and transforming it into useful products, contributing to decarbonisation. Mitigation beyond the value chain: Develops technologies that could be applied outside its own operation to reduce global emissions.	Downstream	Present	Financial and Material	€ 60,000
Scope 2	Sale of 100% renewable energy (with attributes)	Climate leadership: Drives the energy transition through mechanisms that certify the use of clean energy.	Downstream	Present	Financial	€ 6,012,294
Scope 1+2+3	Registration and sale of carbon credits (CERs and VCS)	Climate leadership: Facilitates decarbonisation by allowing other entities to offset their emissions through the purchase of carbon credits.	Downstream	Present	Financial	€ 1,733



METRICS AND TARGETS

[E1-4] DECARBONISATION PATHWAY

ACCIONA Energía has a roadmap that develops the Net Zero principle established in its Climate Change Policy, promoting emission reduction targets (More information on the decarbonisation levers in [E1-1] Transition Plan and [E1-3] Actions and resources in relation to climate change policy). These targets, the same as those of its parent company ACCIONA and aligned with the Science Based Targets (SBTi) global initiative, are in line with the Business Ambition 1.5°C commitment, to avoid a global average temperature increase of more than 1.5°C.

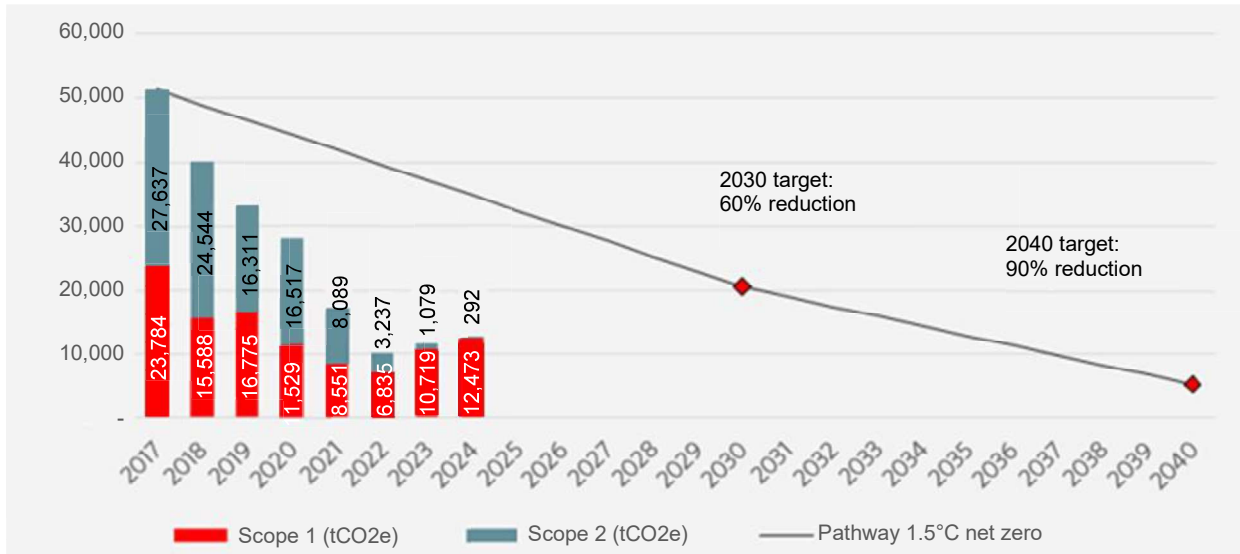
At the time of writing, ACCIONA Energía is in the process of updating its SBTi targets for scopes 1, 2 and 3. Until such time as this update materialises, ACCIONA Energía maintains the validity of the targets aligned and publicly committed to SBTi under the ACCIONA group and directly applicable to ACCIONA Energía, and which comply with the assumptions and methodology developed by this initiative, which are as follows:

- Reduction in its scope 1 + 2 (market-based) emissions by 60% in 2030 from the 2017 value of 51,421 tCO₂e. This target implies reaching maximum emissions of 34,808 tCO₂e in 2024 (Linear reduction from 2017).
- Reduction in its Scope 3 emissions (categories: Purchased goods and services, capital goods, fuel and energy-related activities, upstream, transportation and distribution, employee commuting and use of sold products) by 47% by 2030 compared to the 2017 value of 371,555 tCO₂e. This target implies reaching maximum emissions in the specified categories of 277,523 tCO₂e in 2024 (Linear reduction from 2017).
- Reduction in scope 1 + 2 (market-based) emissions by 90% from the previously mentioned 2017 emissions value by 2040 and reaching Net-Zero by neutralising residual emissions.
- Reduction in scope 3 emissions by 90% from the 2017 emissions value of 371,555 tCO₂e by 2050 and reaching Net-Zero by neutralising residual emissions.

According to the company's GHG emissions data which can be found in section E1-6:

- The 2024 scope 1 + 2 (market-based) target associated with ACCIONA Energía has been achieved, with emissions in 2024 totalling 12,765 tCO₂e. Achieving reductions of 75% compared to the baseline year.
- The 2024 Scope 3 target (Categories: Purchased goods and services, capital goods, fuel and energy-related activities, upstream, transportation and distribution, employee commuting and use of sold products) associated with ACCIONA Energía has not been achieved, as these emissions resulted in a total of 449,950 tCO₂e in 2024.

Evolution of compliance with scope 1 and 2 emission targets



[E1-5] ENERGY CONSUMPTION AND RENEWABLE PRODUCTION

Own energy consumption

In 2024, ACCIONA Energía consumed 1,932,718 MWh of energy. Of this, 98% is of renewable origin. The company’s GHG emission (scope 1+2) reduction goal (a 32.3% reduction compared to 2017) intrinsically implies a non-renewable energy reduction target too. This target has been met, in the same sense as the scope 1 and 2 emissions target, largely due to the progressive increase in the consumption of renewable electricity, which represents 99% of the total electricity consumed.

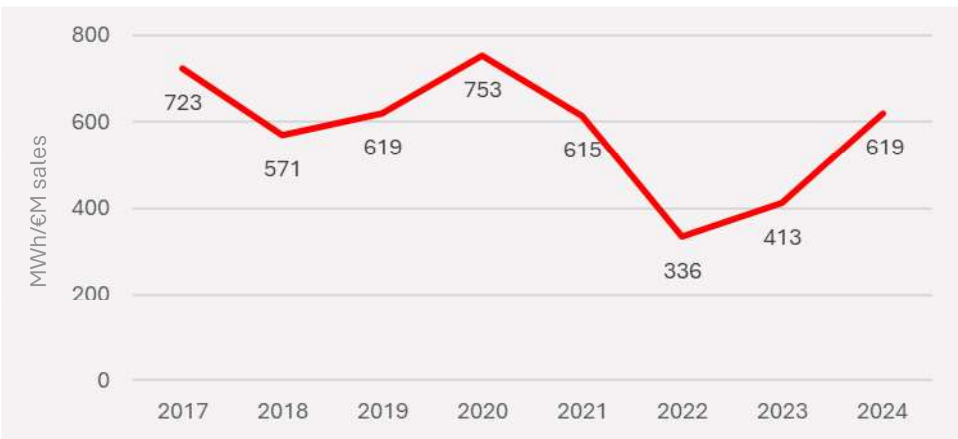
Category	2017	2018	2019	2020	2021	2022	2023	2024
Fossil fuel sources	131,977	87,440	75,667	72,099	50,100	32,609	43,049	44,548
Diesel	12,064	9,446	11,631	11,317	9,841	7,382	14,176	14,382
Natural gas	49,589	15,307	21,194	17,572	16,288	14,100	17,967	22,517
Propane	0	0	0	0	0	0	0	0
Petrol	0	4	5	3	29	93	5,673	5,973
LPG	0	0	0	0	0	0	0	0
Coal	0	0	0	0	0	0	0	0
Electricity	70,324	62,683	42,836	43,206	23,942	11,033	5,233	1,676
Heat, steam and cooling	0	0	0	0	0	0	0	0
Nuclear sources	0	0	0	0	0	0	0	0
Other fuels	0	0	0	0	0	0	0	0
Renewable sources	1,265,563	1,258,859	1,235,873	1,332,021	1,520,828	1,463,154	1,463,642	1,888,170
Biomass fuel	1,189,752	1,220,269	1,179,469	1,249,749	1,271,296	1,287,921	1,237,411	1,328,007
Biogas fuel	0	0	0	0	0	0	0	0
Bioethanol fuel	0	0	0	0	0	7	72	73
Biodiesel fuel	0	0	0	0	0	453	663	604
Hydrogen	0	0	0	0	0	0	0	0
Purchased electricity	75,811	38,590	56,404	82,273	249,533	174,774	225,496	268,855
Self-generated electricity consumed	NA	NA	NA	NA	NA	NA	NA	290,631
TOTAL (MWh)	1,397,540	1,346,299	1,311,540	1,404,120	1,570,928	1,495,763	1,506,691	1,932,718

Energy intensity

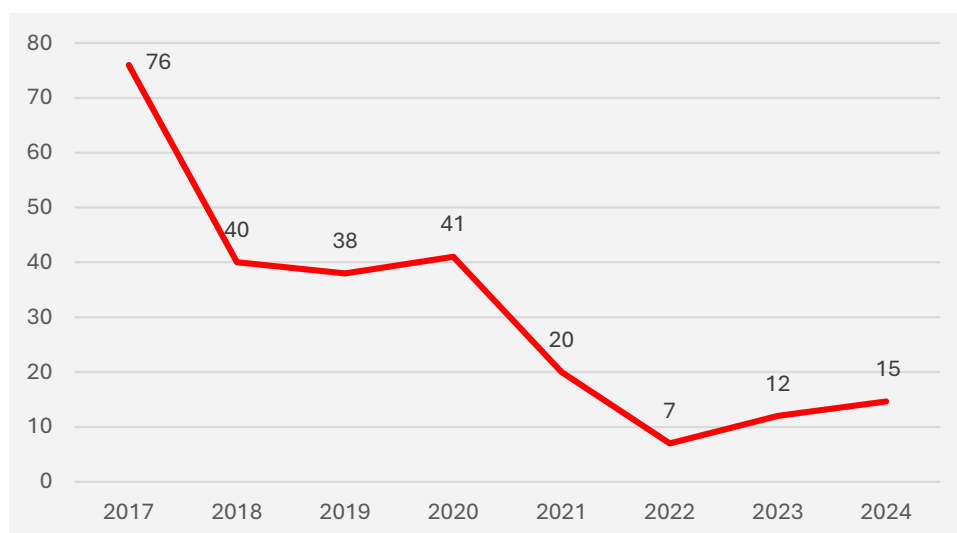
In 2024, ACCIONA Energía's total energy intensity was 634 MWh per million euros of net revenue. This value is obtained by adding the energy intensity of renewable (619 MWh/€M) and non-renewable origin (15 MWh/€M), according to the sources detailed in the above table. The 49% increase in energy intensity compared to 2023 is mainly due to the 14% drop in revenues and the inclusion of self-generated and consumed renewable electricity in the total calculation for the first time, which was not available in previous years.

	2023	2024	% 2024/2023
Energy intensity by net revenue (MWh/€M)	425	634	49 %
Renewable energy intensity by net revenue (MWh/€M)	413	619	50 %
Non-renewable energy intensity by net revenue (MWh/€M)	12	15	20 %

Renewable energy intensity by net revenue (MWh/€M sales)



Non-renewable energy intensity by net revenue (MWh/€M sales)



The increase in 2024 compared to 2023 is due to lower revenues and a similar consumption of non-renewable energy sources as in the previous year.

[E1-6] GROSS SCOPES 1, 2, 3 AND TOTAL GREENHOUSE GAS EMISSIONS

The emissions generated are calculated according to the criteria defined in the GHG Protocol¹⁴, under the financial control scheme, consolidating them as CO₂e emissions corresponding to all the GHGs that are important for the company: CO₂, CH₄, N₂O, HFC and SF₆.

The criteria for the consolidation of energy consumption and other emissions follow the same accounting criteria. The conversion factors used are those indicated by:

- Intergovernmental Panel on Climate Change (IPCC), in the 2006 IPCC Directives for GHG inventories.
- National Inventory of Greenhouse Gases (GHG) of Spain.
- International Energy Agency.
- Red Eléctrica de España (the Spanish grid operator).
- ACCIONA Green Energy.
- Department for Environment, Food and Rural Affairs (DEFRA), of the United Kingdom.
- European Environment Agency
- RED II

Scope 1 & 2 emissions

In 2024, ACCIONA Energía's Scope 1 emissions reached 12,473 tCO₂e and market-based Scope 2 emissions reached 292 tCO₂e. Total emissions reached 12,765 tCO₂e, 8% more than the previous year due to higher natural gas consumption at the solar thermal plant. Despite this increase in emissions, the company continues to meet its decarbonisation pathway and its science-based Scope 1 and 2 emissions reduction target to 2030 as compared to baseline year (2017) emissions have been reduced

¹⁴ WBCSD/WRI, 2004. *Greenhouse Gas Protocol: a Corporate Accounting and Reporting Standard*.

by 75%. At the same time, the location-based Scope 2 emissions stood at 52,547 tCO₂e.

The company has been able to further reduce market-based Scope 2 emissions due to the increased percentage of renewable electricity in total electricity consumption. A total of 99% of electricity consumed by the company is of renewable origin, which has enabled a 73% reduction in Scope 2 emissions compared to the previous year.

None of ACCIONA Energía's activities are regulated under schemes involving the use of emission rights.

In accordance with the information on targets presented above in [E1-4], ACCIONA Energía's performance in relation to the SBTi target is presented below.

Evolution of compliance with scope 1 and 2 emission targets (tCO₂e)

Milestones and Annual Target							
	Baseline year (emissions considered for current targets) 2017	2024	% 2024 / 2023	Target 2030	Target 2040	Target 2050	Annual target / baseline year
Scope 1 GHG emissions							
Scope 1 gross greenhouse gas emissions (tCO ₂ e)	23,784	12,473	16%	9,514	2,378	2,378	4.6% (until 2030) and 3.0% (2030-2040)
Percentage of Scope 1 GHG emissions in regulated emissions trading schemes (%)	0	0	0	NA	NA	NA	NA
Scope 2 GHG emissions							
Scope 2 gross GHG emissions, location-based (tCO ₂ e)	47,227	52,547	18%	NA	NA	NA	NA
Scope 2 gross GHG emissions, market-based (tCO ₂ e)	27,637	292	-73%	11,055	2,764	2,764	4.6% (until 2030) and 3.0% (2030-2040)

Targets broken down by scope for information purposes, with the target in each case being equal to the sum of the market-based Scope 1 and Scope 2 emissions figure

Scope 3 emissions

In 2024, ACCIONA Energía set a science-based target to reduce scope 3 GHG emissions by 25.3% compared to baseline year 2017 for the following set of categories: products, services and raw materials; capital goods; activity related to energy use (not scope 1 or scope 2); upstream transport and distribution; employee commuting and use of products sold by the organisation.

ACCIONA Energía, in its commitment to sustainability, quantifies indirect greenhouse gas emissions across its value chain. To this end, it classifies its scope 3 emissions into different categories and applies specific methodologies for each one, with the aim of obtaining a rigorous measurement aligned with international standards.

Emissions from products, services, raw materials, capital goods and upstream transport are calculated from order data during the reporting period. Through a specialised tool, the economic expenditure of each order is converted into tonnes of CO₂e, using country and economic sector specific emission factors.

Waste management is a key element in ACCIONA Energía's environmental impact analysis. As most of the waste comes from the operation of biomass, construction of renewable generation projects and repowering of assets, the emissions calculation is based on the volume and type of waste generated. No waste is generated as a result of the end of life of the products sold by the company.

Mobility is also considered within scope 3 emissions. In the case of business trips, the calculation is based on mileage records and the means of transport used. For employee commuting, data on the means of transport used and the distance travelled are collected through representative surveys, allowing the values to be extrapolated to the entire workforce.

ACCIONA Energía does not have any leased assets, either by the organisation or to the organisation, and the investments include the energy consumption of the projects identified as being accounted for using the equity method. Emissions for the investment category are calculated based on the reported resources used in such projects.

Furthermore, due to the nature of ACCIONA Energía's business, the categories of downstream transport and distribution, processing of sold products and franchises have not been material in the assessment of scope 3 emissions.

Breakdown of scope 3 emissions for the relevant categories (tCO₂e)

Milestones and annual target							
	Baseline year 2017	2024	% 2024/ 2023	Target 2030	Target 2040	Target 2050	Annual target / Baseline year
Significant Scope 3 GHG emissions							
Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	372,736	455,029	-27%	Not applicable	Not applicable	Not applicable	The reduction target does not apply to total emissions but to the 6 categories identified in [E1-4].
Total gross indirect emissions of GHG reduction target categories (Scope 3) (tCO ₂ e)	371,555	449,950	-27%	196,924	117,040	37,156	6% (until 2030) and 4.1% (2030-2050)
1. Goods and services purchased	81,322	189,293	-18%	43,101	25,616	8,132	6% (until 2030) and 4.1% (2030-2050)
2. Capital goods	218,507	166,160	-40%	115,809	68,830	21,851	6% (until 2030) and 4.1% (2030-2050)
3. Fuel and energy activities (not covered by Scope 1 or 2)	29,549	22,654	-70%	15,661	9,308	2,955	6% (until 2030) and 4.1% (2030-2050)
4. Upstream transport and distribution	39,356	61,915	-28%	20,859	12,397	3,936	6% (until 2030) and 4.1% (2030-2050)
5. Waste generated in operations	0	2	1,440%	Not applicable	Not applicable	Not applicable	Not applicable
6. Business trips	0	3,406	6%	Not applicable	Not applicable	Not applicable	Not applicable
7. Employee commuting	2,821	4,529	-11%	1,495	889	282	6% (until 2030) and 4.1% (2030-2050)
8. Upstream leased assets	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
9. Transport and distribution	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
10. Transformation of products sold	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
11. Use of products sold	0	5,398	0%	0	0	0	6% (until 2030) and

							4.1% (2030-2050)
12. End-of-life treatment of sold products	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
13. Downstream leased assets	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
14. Franchises	0	0	0%	Not applicable	Not applicable	Not applicable	Not applicable
15. Investments	1,181	1,671	-11%	Not applicable	Not applicable	Not applicable	Not applicable

Total emissions

Target and total emissions

Milestones and Annual Target							
	Baseline year (emissions considered for current targets) 2017.	2024	% 2024 / 2023	2030 target	2040 target	2050 target	Annual target / baseline year
Total GHG Emissions							
Total GHG emissions (location-based)	443,747	520,050	77%	Targets are broken down by scope. Joint targets are not set for all scopes.			
Total GHG emissions (market-based)	424,157	467,795	74%	Targets are broken down by scope. Joint targets are not set for all scopes.			

*Targets are broken down by scope. Joint targets are not set for all scopes.

GHG emission intensity

ACCIONA Energía measures the intensity of its emissions in Scopes 1, 2 and 3, as well as its total emissions. The data show that the reduction in Scope 2 emissions (market-based) and Scope 3 has led to a decrease in emission intensity compared to the previous year, despite a 14% drop in net revenue. However, in the scopes where no net emission reduction was achieved (Scope 1 and Scope 2 (location-based)), the fall in revenue led to an increase in GHG emission intensity.

GHG intensity by net revenue	2023	2024	% 2024/ 2023
Scope 1 GHG emissions by net revenue (tCO ₂ e/€M)	3.02	4.09	35%
Scope 2 GHG emissions (market-based) by net revenue (tCO ₂ e/€M)	0.30	0.10	-69%
Scope 2 GHG emissions (location-based) by net revenue (tCO ₂ e/€M)	12.61	17.24	37%
Scope 3 GHG emissions by net revenue (tCO ₂ e/€M)	175.5	149.3	-15%
Total GHG emissions (market-based) by net revenue (tCO ₂ e/€M)	178.84	153.46	-14%
Total GHG emissions (location-based) by net revenue (tCO ₂ e/€M)	191.14	170.60	-11%
Net revenue used to calculate GHG intensity	3,547	3,048	-14%
Net revenue (other)	0	0	0
Total net revenue (in the financial statements)	3,547	3,048	-14%

Other GHG emissions

Evolution of other GHG emissions (t)

	2017	2018	2019	2020	2021	2022	2023	2024
Biogenic CO ₂	436,821	448,523	432,235	459,381	466,788	472,771	445,776	478,383
CH ₄	133	137	132	46	2	12	11	11
N ₂ O	17	18	17	9	7	4	4	4
SF ₆	0.080	0.050	0.054	0.055	0.032	0.021	0.024	0.048
Refrigerants	0	0	0	0	0	0	0	0

Renewable energy production and emissions avoided

At 2024 year-end, ACCIONA Energía had 15,354 MW of renewable capacity installed, generating 26,708 GWh. This renewable production avoided the emission into the atmosphere of 14.4 million tonnes of CO₂e, 11,456 tNO_x, 26,964 tSO_x and 241 tPM₁₀.

Emissions avoided per country by generating renewable electricity

	Installed capacity (MW)	MWh (Net generation)	CO ₂ e Avoided (t)
Australia	1,895	1,423	1,243,188
Canada	398	497	315,607
Chile	922	1,862	1,396,278
Costa Rica	50	212	186,163
Croatia	102	74	36,554
Egypt	186	427	196,360
Spain	5,718	12,353	5,260,044
United States	2,998	3,693	2,025,023
Hungary	-	31	16,927
India	409	362	330,147
Italy	156	230	104,384
Mexico	1,480	3,336	1,638,945
Peru	136	611	319,430

Poland	101	224	169,155
Portugal	166	364	137,609
Dominican Republic	221	96	71,530
South Africa	232	541	551,402
Ukraine	100	112	99,241
Vietnam	84	260	256,643
TOTAL	15,354	26,708	14,354,629

* Totals are calculated taking into account all the decimals on each row in the table, which means that the sum of the rows may differ slightly from the total.

[E1-7] GREENHOUSE GAS REMOVALS AND GREENHOUSE GAS MITIGATION PROJECTS FINANCED BY CARBON CREDITS

ACCIONA Energía's emission reduction targets to achieve the Net-Zero goal are aligned with the Science Based Targets (SBTi) global initiative. These targets include reducing emissions by 90% for scope 1 and 2 by 2040 and by 2050 for scope 3. Accordingly, ACCIONA Energía is committed to using the mechanisms validated by SBTi to offset residual emissions that cannot be eliminated, ensuring compliance with the requirements established by the initiative.

Activities for the removal and storage of GHGs developed or contributed

ACCIONA Energía does not have any technological or hybrid GHG removal and storage actions developed in its own operations or upstream and downstream in its value chain that have not been consolidated in section [E1-6].

GHG emission reductions or removals financed through carbon credits

Since 2016, ACCIONA has been voluntarily cancelling 100% of the annual residual emissions (Scopes 1 and 2) that it has not been able to reduce for all the companies in the business group, including ACCIONA Energía, by means of carbon credits generated by the company's own renewable energy projects.

These credits are endorsed by recognised quality standards, thus guaranteeing the integrity and positive impact of the projects financed through this instrument.

It is important to note that this cancellation of credits does not constitute a dependency on or a requirement for compliance with the greenhouse gas (GHG) reduction targets set out in E1-4. On the contrary, it is a voluntary action that acts as an additional incentive towards decarbonisation, promoting direct and sustainable measures to reduce emissions.

Carbon credits cancelled in reporting year	2023	2024
Total (tCO₂e)	11,799	12,765
Proportion of removal projects (%)	0%	0%
Proportion of reduction projects (%)	100%	100%
Recognised quality standard VERRA (%)	100%	0%
Recognised quality standard CERCARBON (%)	0%	100%
Proportion of projects within the EU (%)	0%	0%
Proportion of carbon credits that can be considered as corresponding adjustments (%)	0%	0%

[E1-8] INTERNAL CARBON PRICING

ACCIONA Energía's compliance with the decarbonisation pathway requires the development of projects that enable the reduction of emissions in its activities, towards a completely decarbonised scenario.

To this end, one of the initiatives implemented is the allocation of specific carbon budgets for the projects with the highest emissions covering 100% of its scope 1 and 2 emissions, which in 2024 resulted in 12,765 tCO₂e. Through this measure, each of the company's main actors is held directly responsible for the generation of GHG emissions.

At the end of the year, actual emissions are compared with budgeted emissions, and depending on whether the carbon budget is met or not, the generated emissions are taxed internally at an internal rate of €7.5/tCO₂e, up to an emissions volume equal to the budgeted amount, and with an increasing price up to €190/tCO₂e for emissions volumes that exceed the established carbon budget.

The methodology for calculating and establishing this internal carbon pricing system is based on the level of risk represented by each additional tonne of emissions, in terms of potential monetary penalties associated with loans linked to compliance with the ACCIONA parent company's emission reduction targets.

The total amount accrued through the application of internal carbon pricing is used to finance decarbonisation measures through the creation of the company's decarbonisation fund, as well as the acquisition and cancellation of carbon credits (as many as there are scope 1 and scope 2 emissions in the year).

In 2024, the Decarbonisation Fund financed two projects for ACCIONA Energía: first phase of the project to capture biogenic CO₂ in biomass plants to manufacture methanol. ACCIONA Energía has three biomass plants in operation that generate more than 400,000 tonnes of biogenic CO₂. In addition, it is in the process of building a fourth plant that will be operational in 2025 and that will produce around 480,000 tonnes of biogenic CO₂. Capturing this biogenic CO₂ represents an opportunity for the company's renewable hydrogen business, as it will allow it to be used together with 100% green hydrogen to produce renewable methanol.

The second project financed was the analysis of the technical and economic viability of using

alternative fuels to fossil fuels (biomethane, H₂, biodiesel and HVO) for use in cold starts in biomass plants.

At the end of 2024, the Decarbonisation Fund committee selected the decarbonisation projects to be developed in 2025. In the case of ACCIONA Energía, the second phase of the biogenic CO₂ capture project will be carried out, developing the basic engineering of the plant and its integration with an e-Methanol (e-MeOH) production plant and a hydrogen production plant, optimising their joint operation.

3



E2 Pollution

Impact, risk and opportunity management

Metrics and targets

E2 Pollution

DISCLOSURE REQUIREMENTS

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS POLLUTION-RELATED MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[E2-1] POLICIES RELATED TO POLLUTION

[E2-2] ACTIONS AND RESOURCES RELATED TO POLLUTION

METRICS AND TARGETS

[E2-3] TARGETS RELATED TO POLLUTION

[E2-4] POLLUTION OF AIR, WATER AND SOIL

[E2-5] SUBSTANCES OF CONCERN AND SUBSTANCES OF VERY HIGH CONCERN

[E2-6] ANTICIPATED FINANCIAL EFFECTS FROM POLLUTION-RELATED, RISKS AND OPPORTUNITIES

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS POLLUTION-RELATED MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy that is developed in accordance with the guidelines established by the due diligence process (set out in GOV-4). Based on the material issues resulting from ACCIONA Energía's Materiality Analysis, the potential situations of impact, risk and opportunity are expanded and evaluated exhaustively, enabling the management and remediation of those that exceed the tolerance thresholds classified as acceptable.

Pollution aspects are integrated into the ESG Risk and Impact Management Procedure in such a way that all projects are assessed in terms of exposure (likelihood) and vulnerability (economic consequence) for risk situations and in terms of exposure (likelihood) and magnitude (severity) for environmental impact situations.

This procedure is carried out annually and results in the categorisation and prioritisation of risk and impact situations, for which the necessary mitigation and remediation measures are implemented. This reduces the exposure and vulnerability of different locations and supply chains to the effects of pollution, regulatory restrictions on emissions and discharges, changes in environmental quality standards, new regulations, etc. (More information on the governance of sustainability risk management and internal controls in [GOV-5]).

Pollution-related impacts can affect people and surrounding communities as well as the environment. ACCIONA Energía therefore considers affected communities to be a material issue according to the results obtained in the Materiality Analysis. Among the systems for identifying, assessing and mitigating pollution, ACCIONA Energía maintains open dialogue with the affected communities on the impacts derived from its business activity, as established in section S3-2.

Regular assessments carried out by both the competent environmental authorities and the environmental managers of the company's projects and activities allow for the collection and consolidation of information on air, soil and water pollution impacts. In this way, ACCIONA Energía can determine the sites where it can establish impact prevention actions and analyse exposure and vulnerability to potential pollution-related risks.

In 2024, more than 300 ACCIONA Energía sites were assessed, using specific indicators to monitor different pollution-related indicators. To ensure that these risks are properly managed and prevented, all sites have site managers who supervise operations.

The main sources of potential negative impact identified are:

- Emissions of polluting gases into the atmosphere: NO_x, SO_x and PM₁₀ emissions are minimal, but not non-existent. These come from the combustion of biomass and the use of fleet vehicles, mainly to carry out operation and maintenance work.
- Occasional leaks: the presence of SF₆ in some electrical installations may cause minimal leakage to the atmosphere over time and as the equipment ages.
- Accidental spills and spillages: the use of oils, lubricants and other chemicals required for the maintenance and operation of facilities can present a potential source of impact.
- Noise and vibrations: construction work on renewable installations is a source of impact, as is their subsequent operation.

These activities, which interact with nature at various stages of their operations and value chain, depend on ecosystem services of air filtration, sensory impact mediation, solid waste remediation and water purification to perform their activities optimally, so negative consequences of such impacts could be an obstacle to site operations.

ACCIONA Energía therefore develops initiatives focused on mitigating pollution and improving the natural environment, such as reducing polluting emissions, minimising waste, measuring and reducing noise impacts, promoting decarbonised mobility solutions and implementing measures to improve air quality and people's well-being. These actions reflect the company's commitment to sustainability, innovation and environmental protection, actively contributing to a cleaner and healthier future.

ACCIONA Energía's supply chain represents a critical point in the system for identifying and managing pollution-related impacts and risks. The extraction and transport of raw materials, decommissioning activities, and the recycling and disposal of waste are some of the activities with the potential to affect ecosystems and communities. ACCIONA Energía monitors and manages these aspects throughout its value chain, raising its sustainability standards and commitments to its suppliers, contractors, customers and other stakeholders with the commitment to minimise environmental impacts.

With regard to the assessment and management of pollution-related risks and opportunities, specific analyses carried out at facility level are used in addition to their historical performance records, so that those projects with the greatest potential impacts are identified and monitored.

The scenarios developed by the Taskforce on Nature-related Financial Disclosures (TNFD) have been used as a basis to identify and assess the risks and opportunities associated with the interactions between ACCIONA Energía's operations and the fundamental components of nature, such as biodiversity, water, soil and climate.

The scenarios used are: "Ahead of the Game", which proposes a proactive and coordinated approach to nature conservation, driven by successful carbon policies and social pressure for transparency regarding impacts on nature; "Go Fast or Go Home", characterised by rapid and severe impacts on ecosystem services, forcing companies to act urgently and boldly to avoid criticism for insufficient commitments; "Sand in the Gears", where conflicting signals and a lack of coherence in policies and markets hinder systematic action, despite significant impacts on ecosystems; and "Back of the List", in which the global priority focuses on carbon, relegating nature risks, with slow progress on standards and reporting models.

In relation to the climate component, ACCIONA Energía additionally assesses risk situations linked to climate change using equivalent scenarios developed by NGFS (Network for Greening the Financial System), ensuring consistency from a climate perspective.

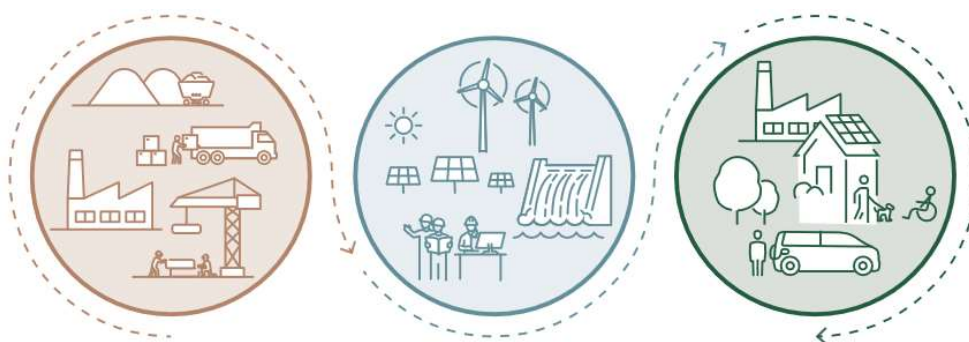
In this context, and given ACCIONA Energía's geographical diversity, the strategy is adapted to address the most challenging scenarios, ensuring robust planning and alignment with its commitment to sustainability, prioritising the dynamics that present the greatest challenges for natural systems and the human activities dependent on them.

The complete results are integrated into ACCIONA Energía's Risk Management System and are submitted to the Board of Directors through the Audit and Sustainability Committee to determine whether the level of risk is tolerable following the governance previously presented ([GOV-5]).

The rating criteria are detailed below. These are common to any risk assessment and management process carried out at ACCIONA Energía.

Indicator	Score	Quantitative scoring	Criteria
Exposure (Likelihood)	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1-5]	Percentage drop in sales / EBITDA / EBT.

Impacts, risks and opportunities identified



Sub-topic	Upstream Value Chain	Own Operations	Value Chain: Downstream
Air pollution	NI - Generation of air pollutants in the construction of new assets	PI - Power generation with lower emission of air pollutants than non-renewable technologies NI - Generation of air pollutants from biomass and solar thermal generation	
Soil pollution		NI - Potential accidental spillages adversely affecting the environment R - Potential fines or penalties related to the foregoing	
Water pollution		NI - Potential return of water to the environment violating metrics and negatively affecting the receiving water bodies There may also be a discharge into a watercourse,	
Substances of concern		NI - Use of materials containing substances of concern, affecting the environment or humans	

Caption:

NI - Negative impacts

PI - Positive impacts

R – Risks

O – Opportunities

+ More information: [Annex I Dual Materiality](#).

A total of 10 issues are identified, of which 7 have been considered relevant to pollution, related to the activities carried out by the company. The relevant impacts, risks and opportunities identified in the process are represented below.

NEGATIVE IMPACTS

- Generation of air pollutants in the construction of new assets

The construction of renewable infrastructures requires the use of heavy machinery and transport of materials. These activities generate emissions of polluting gases mainly due to the use of fossil fuels in equipment and vehicles. Also, the movement of heavy machinery, vehicle traffic and earthworks can generate dust and noise.



- Generation of air pollutants from biomass and solar thermal generation

Technologies such as biomass and solar thermal generate, albeit insignificantly compared to traditional fossil fuel technologies, emissions to the environment. These pollutant emissions come from the biomass combustion process, the use of biomass cold start fuels and the combustion of gas for preheating the thermal fluid in the solar thermal plant, when the atmospheric temperature is low.



- Potential accidental spillages adversely affecting the environment

During the operation or maintenance of the facilities, there is a risk of accidental spillage of oils, fuels or other chemicals used in the facilities. These discharges could potentially contaminate nearby soils and water bodies, affecting the surrounding flora, fauna and water quality. The extent of the impact on the environment, if it were to occur, would be negligible as the volumes handled are limited.



- Potential return of water to the environment in breach of discharge parameters and negatively affecting the receiving water bodies.

Some plants, such as solar thermal or biomass plants, require the use of water for cooling processes. If the water used is not adequately treated before being returned to the environment, it can contain high temperatures that alter the quality of the water in the receiving bodies, affecting aquatic ecosystems and their biodiversity.



- Use of materials containing substances of concern, affecting the environment or humans

Renewable technologies often use materials that may include chemicals of concern, such as those found in batteries, solar panels, wind turbines or thermal fluids. The handling and disposal of these

materials may release toxic substances into the environment or pose health risks to workers if not handled with proper controls.



RISKS

- **Potential fines or penalties related to negative environmental impacts**

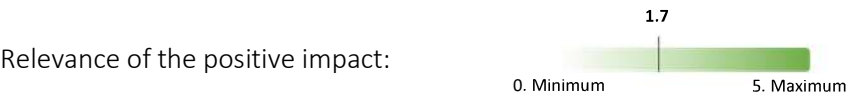
Failure to comply with environmental regulations can lead to fines or penalties, as well as reputational impact. This risk arises in the case of negligence related to the negative impacts described above.



POSITIVE IMPACTS

- **Power generation with lower emissions of air pollutants than non-renewable technologies**

Renewable technologies such as wind, solar PV and hydro are commonly referred to as “clean energy” because of their ability to generate electricity with low direct emissions. These energy sources contribute to improving air quality, reducing the carbon footprint and protecting ecosystems. Its clean nature reinforces its role in the fight against climate change and in meeting the objectives of the transition to a decarbonised energy system.



[E2-1] POLICIES RELATED TO POLLUTION

ENVIRONMENTAL POLICY

PURPOSE

ACCIONA Energía's Environmental Policy establishes the framework for managing the strategy of protecting, preserving and improving the environment. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to ecosystems and their components.

ACCIONA Energía considers it essential to comply with current environmental legislation in all the countries where it operates, minimising its environmental footprint by integrating environmental criteria from the early stages of planning and design of its projects, promoting economic growth that respects the limits of the planet.

In this context, ACCIONA Energía's Environmental Policy is aligned with the main international agreements and conventions on the environment, contributing to the commitments of the Paris Agreement, the Convention on Biological Diversity, the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

ACCIONA Energía's Environmental Policy develops the principles and due diligence framework applied by the company in general environmental matters. Based on the contents of this Environmental Policy, specific thematic policies on Water, Biodiversity, Climate Change and Circular Economy are developed which, building on these general bases, define the specific principles and commitments applicable to these particular aspects.

SCOPE

This policy applies to all companies in which ACCIONA ENERGÍA holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to all employees, suppliers, contractors and collaborators.

PRINCIPLES

ACCIONA Energía's Environmental Policy is based on the following principles:

- Regulatory compliance: ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory

frameworks and international standards that reinforce more sustainable development models.¹⁵

- **Damage prevention:** ACCIONA Energía undertakes to prevent and reverse the adverse effects caused by pollution or overexploitation of natural resources, among others, from its operations, even in locations where there is no regulatory framework in this regard. Harm prevention focuses on:
 - **Land protection:** ACCIONA Energía is committed to responsible land management and use. It promotes the proper management of derived resources and waste that may impact it, with the aim of preventing its pollution and preserving its essential ecological functions.
 - **Water protection:** ACCIONA Energía develops solutions that improve the quality, quantity and availability of water, implementing the necessary measures to prevent any form of pollution and ensure the sustainability of this resource.
 - **Air protection:** ACCIONA Energía promotes the improvement of air quality and the reduction of greenhouse gas emissions, noise and light disturbances, and other types of pollutants released into the air, encouraging the use of clean energy and applying measures to mitigate their impact on the environment.
- **Positive impact:** ACCIONA Energía promotes an approach beyond the mitigation of negative impacts, aware of the progressive deterioration of the planet. This approach integrates the entire life cycle of the project, from design to end-of-life, with the aim of generating a positive impact that we call regenerative.
- **Training:** ACCIONA Energía promotes environmental protection both within the organisation and in its value chain, offering training in this area to employees, suppliers and contractors, in order to extend its commitment to its stakeholders.
- **Partnerships with stakeholders:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies, social organisations and other stakeholders, integrating multiple perspectives in its efforts to protect the environment and promote sustainable solutions.

DUE DILIGENCE

ACCIONA Energía implements the due diligence process in its operations structured in six stages defined in the Guide to Responsible Business Conduct¹⁶. This process complies with international environmental frameworks, such as the Convention on Biological Diversity, the Paris Agreement, the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are as follows:

- **Risk and impact identification and assessment:** ACCIONA Energía regularly identifies and assesses actual and potential adverse environmental impacts associated with its business

¹⁵ The Environmental Policy covers all pollutant releases and transfers included in Regulation (EC) No 166/2006 of the European Parliament and of the Council.

¹⁶ Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse human rights and environmental impacts; (3) prevent, interrupt or minimise actual and potential adverse human rights and environmental impacts; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remediate.

activities and business relationships. This process covers the timelines: short, medium and long term.

- **Detection mechanisms:** ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework of ACCIONA Energía's activities. The Ethics Channel is the instrument that the organisation makes available to employees, suppliers, customers and collaborators to report any wrongdoing. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically.
- **Mitigation of adverse effects:** ACCIONA Energía integrates the results of the assessments of adverse environmental effects in the management and internal control systems, in order to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through prevention, mitigation and remediation measures and control activities, aligned with national and international frameworks.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on the environment, ensuring a focus on continuous improvement in its practices.
- **Accountability:** ACCIONA Energía publicly discloses the assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the negative environmental consequences of its activities. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.
- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse environmental impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

This policy has been approved by the Audit and Sustainability Committee of the company's Board of Directors, the body responsible for defining and overseeing compliance with sustainability policies in the environmental, social and corporate governance areas. This Committee also ensures adherence to internal codes and codes of business conduct.

The Environmental Policy is applicable to any form of pollution that may be produced or acquired and/or managed in the company's operations that has an effect on water, soil and/or air, regardless of whether the form of pollution that produces it is considered to be of high potential impact, of concern, of very high concern or of any other consideration.

In this regard, the policy sets out the due diligence principles that the company applies to prevent and mitigate water, air and soil pollution. These mechanisms include: identification and assessment of risks and impacts, implementation of screening mechanisms, mitigation of adverse effects, monitoring and continuous improvement, accountability, remediation and collaboration with authorities.

This policy is interrelated with the Climate Change, Water, Circular Economy and Biodiversity policies, thus covering all aspects related to the protection, preservation and improvement of the environment.

The Environmental Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which the company operates.

+ More information: [Annex IV in: Environmental Policy](#)

[E2-2] ACTIONS AND RESOURCES RELATED TO POLLUTION

The first measure or action in this regard corresponds to ACCIONA Energía's own business model, which, with its exclusively renewable electricity generation activity, mostly produced by wind, photovoltaic, hydroelectric and biomass technology, stands out for its much lower impact compared to other traditional generation technologies. ACCIONA Energía also has an internal impact quantification and reporting indicator called the Environmental Impact Ratio, which assigns a maximum number of potential "non-conformities" related to pollution to each territory, assigning them a value according to their severity. Exceeding these thresholds is reported annually and is considered in the assessment of annual targets.

ACCIONA Energía, within the scope of its Environmental Management System, implemented and certified in accordance with international standard UNE-EN ISO 14001, has a methodology designed to identify and evaluate environmental impacts generated throughout the entire cycle of the company's facilities.

This includes the performance of Environmental Impact Assessments when developing new facilities, as well as the development of a Life Cycle Assessment based on ISO14040 to consider aspects related to the acquisition of materials and the generation and consumption of resources "from cradle to grave".

Likewise, during the operating and decommissioning phase, a complete assessment and prioritisation of environmental aspects is carried out in order to monitor them throughout their useful life, taking into account normal operating activity and unusual operating situations.

As a result of the above analyses and applicable administrative and legal requirements, ACCIONA Energía dedicates resources and carries out a series of actions aimed at: preventing and reducing pollution and restoring, regenerating and transforming the affected ecosystems, which are shown in the following table:

Category	Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current (or future) financial resource link to financial statements (staff costs, investments in equipment, etc.)
Avoiding pollution	<p>1. Spill containment systems in places of use and storage of substances at risk of spillage (transformers and power stations, chemical and waste storage, etc.) and hydrocarbon separators.</p> <p>2. Carrying out environmental emergency drills and practice in responding to emergencies.</p> <p>3. Operating procedures are in place to prevent accidental spills and what to do in the event of a spill. Available to all employees on the Intranet.</p>	<p>Damage prevention (soil and water protection): These measures prevent soil and water pollution by hazardous substances, ensuring their preservation.</p> <p>Training: The drills train employees and collaborators to act in the event of environmental emergencies.</p>	<p>Own operations.</p> <p>This action is included in the company's existing assets (investments already made) as well as in new ones.</p>	Present and short-term future.	Financial, Human.	The financial reporting systems are not currently adapted to capture the investment and expenditure figures associated with these actions, although work will be done to include them in future reports.
Reducing pollution	<p>1. Measures to mitigate atmospheric emissions associated with the combustion process in biomass plants, aligned with Best Available Technology:</p> <ul style="list-style-type: none"> - Continuous emission monitoring for process optimisation - Dust and particle collection and filtration systems for the boiler. <p>2. Measures to reduce noise emission.</p>	<p>Regulatory Compliance and Air Protection:</p> <p>This action, in addition to complying with regulatory requirements, allows air protection by controlling and minimising</p>	<p>Own operations</p> <p>This action is included in the company's existing assets (investments already made) as well as in new ones.</p>	Present and short-term future	Financial, Human	<p>New biomass plant in Logrosán (Extremadura): € 7,900,100</p> <p>Noise level monitoring: € 22,638</p>

	<p><u>New biomass plant in Logrosán (Extremadura):</u></p> <p>(a) It has bag filters for dust collection both in the biomass reception process and in the boiler chimney.</p> <p>b) It also has:</p> <ul style="list-style-type: none">○ Selective catalytic reduction (SCR) system in the boiler, to reduce nitrogen oxide (NO_x) emissions○ Dry flue gas desulphurisation system to reduce SO₂, HCl and HF emissions. <p>(c) System for continuous measurement (SAM) of concentrations of particulate matter, CO, NO, SO₂, HCl and NH₃.</p>	<p>atmospheric emissions by capturing and filtering them and reducing noise emissions beyond the facility itself.</p>				
	<p>Biomass plants have an effluent treatment plant for the treatment of certain water flows prior to discharge (pH correction).</p>	<p>Water protection: This measure ensures water quality and eliminates potential impacts on aquatic biodiversity.</p>	<p>Own operations</p> <p>This action is included in the company's existing assets (investments already made) as well as in new ones.</p>	<p>Present and short-term future</p>	<p>Financial, Human</p>	<p>New biomass plant in Logrosán (Extremadura): € 175,000</p>
<p>Restoring, regenerating and transforming ecosystems</p>	<p>Remediation actions, soil decontamination and analytical actions resulting from releases to land, in 2024.</p>	<p>Damage prevention (soil protection): It contributes to responsible soil management, preventing soil pollution and restoring its ecological function.</p>	<p>Own operations</p> <p>This action is included in the company's existing assets (investments already made) as well as in new ones.</p>	<p>Present and short-term future</p>	<p>Financial, Human</p>	<p>Remediation actions at two sites €231,968</p>



METRICS AND TARGETS

[E2-3] TARGETS RELATED TO POLLUTION

ACCIONA Energía is committed to reducing pollution by reducing pollutants released into the air, soil and water. This commitment is fully aligned with the principles of the company's Sustainability Master Plan (SMP) and is a key component of its business strategy to address global environmental challenges. The SMP transforms the regenerative spirit of policies into practical and adaptive approaches.

The scope of the targets includes all facilities under ACCIONA Energía's consolidation perimeter. This approach ensures consistent implementation and alignment with the company's sustainability targets.

To establish these targets, ACCIONA Energía has carried out a materiality analysis of the different pollutants and has set targets to reduce its SO_x, NO_x and PM₁₀ emissions. These targets result in a commitment to reduce these emissions by 4% by 2025, based on 2017 values, with a baseline of 180 tonnes (SO_x), 594 tonnes (NO_x) and 9 tonnes (PM₁₀). In addition, by 2024, an interim target has been set to reduce emissions by 3.5% compared to 2017 values, allowing progress to be continuously monitored and adjustments to be made if necessary.

With regard to negative impacts related to water or soil pollution, a target of zero significant discharges is established, considering significant those that exceed the legal thresholds set out in Regulation (EC) No 166/2006 of the European Parliament and of the Council, Annex II.

ACCIONA Energía carries out half-yearly monitoring of emissions through data collection and consolidation, which allows proactive adjustments to be made when variations are detected and ensures that the company is complying with the established targets.

The pollution targets were defined as an integral part of the company's Sustainability Master Plan. It was developed with the support of external groups and our own employees, as well as benchmark reporting indices such as CDP, who contributed their experience and knowledge to ensure a robust approach aligned with international best practices. Since its definition in 2020, the targets set out in the SMP have remained unchanged.

[E2-4] POLLUTION OF AIR, WATER AND SOIL

ACCIONA Energía comprehensively manages impacts related to air, water and soil pollution, carrying out all the necessary measures to mitigate the adverse effects caused, as well as monitoring the indicators that make it possible to continuously assess and supervise emissions into the air, discharges into the water and releases to land at its sites.

During 2024, three ACCIONA Energía sites submitted consolidated amounts above the applicable thresholds according to Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council on the European Pollutant Release and Transfer Register of pollutants released to air, water and land, with the exception of GHG emissions that are disclosed in accordance with ESRS E1. Climate Change section [E1-6].

The methodology for calculating pollutants is classified into three categories according to their destination: air, water or soil.

1. **Air pollution:** They can be calculated or measured. The calculation is based on the consumption of resources and fuels, multiplied by a pollutant-specific emission factor. Alternatively, in stationary installations, such as biomass plants, pollutants can be measured directly.
2. **Water pollution:** They can originate from continuous discharges with trace pollutants, which

measure the total amount of pollutant. Pollution can also occur from accidental spills containing regulated pollutants.

3. **Soil pollution:** They usually come from accidental spills, such as hydrocarbons or oils. In these cases, the amount of pollutant spilled is calculated.

Once the amounts of pollutants per type and installation have been determined, they are compared with the reporting thresholds set out in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council, and only those exceeding these limits are consolidated.

In addition, the results obtained from the materiality analysis have not shown any interrelationship between the materials acquired and the products sold by ACCIONA Energía with microplastics, so this indicator is not included in this disclosure.

Air pollution from non-GHG substances

Air pollution and reduced air quality can result from emissions and disturbances from activities such as transport and energy generation.

ACCIONA Energía therefore monitors and supervises performance related to emissions into the air of air pollutants, excluding GHG emissions that are disclosed in accordance with ESRS E1. Climate Change section [E1-6], in accordance with the objectives established in the Sustainability Master Plan. ACCIONA Energía's material compounds include:

Evolution of atmospheric emissions of non-GHG pollutants (t)

	2017	2021	2022	2023	2024
NO _x	594	712	608	497	545
SO _x	180	125	173	131	193
PM ₁₀	9	5	5	4	5

The data represent a slight increase in NO_x, SO_x and PM₁₀ emissions due to increased activity in biomass plants compared to the previous year.

In all 3 biomass plants the NO_x emission thresholds set out in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council were exceeded.

At these sites, NO_x emissions amounted to 498 tonnes and PM₁₀ emissions 4 tonnes, representing 91% and 78% of the total emissions for each pollutant, respectively.

No impacts related to noise and sensory disturbances to the surrounding environment were reported in 2024.

Water pollution

In 2024, there were no environmental incidents related to discharges into the water environment in ACCIONA Energía projects.

In the same period, a minor environmental infringement was recorded at a hydroelectric power plant for not having a device for the visual control of the ecological flow, for a total amount of €1,500. The

situation was quickly corrected, and the lessons learned were incorporated into internal procedures to avoid repetition.

Soil pollution

Soil degradation can arise from spills and deficiencies in the handling of chemicals, wastes, transport of hazardous materials and industrial operations. These actions can cause soil fertility to deteriorate, affect groundwater quality and alter the health of terrestrial ecosystems.

In 2024, 2 incidents related to releases of substances to land were reported as non-significant, i.e., neither of them exceeds the legal thresholds in Regulation (EC) No 166/2006 of the European Parliament and of the Council, Annex II. These incidents totalled a volume of 0.718m³.

Below are the volumes and measures taken for the two accidents that occurred:

Type of incident	Volume (m ³)	Measures taken
Hydrocarbon spills	0.718	Contaminated materials were removed by excavation and manual cleaning. After analysing the incidents, monitoring protocols and compliance with environmental protection measures were reinforced.

The incidents recorded on the soil have not had a significant negative impact on the environment where they occurred.

All environmental incidents related to soil contamination and degradation have been identified, recorded, assessed, and remediated in accordance with the guidelines established in the accident containment plans or in accordance with the measures determined by the competent environmental agencies.

[E2-5] SUBSTANCES OF CONCERN AND SUBSTANCES OF VERY HIGH CONCERN

ACCIONA Energía seeks to carry out its activity without generating toxic substances or pollution in line with the transition towards a sustainable economy and in accordance with the need to prevent, control and eliminate pollution.

The presence of substances of concern and substances of very high concern in ACCIONA Energía's operations is limited to their presence in the materials used, such as fuels or concrete, and not to their direct purchase or production in isolation. This approach significantly minimises the impacts of direct environmental impacts and the risks associated with more stringent regulatory changes by ensuring responsible management of the resources used.

The total quantities of substances of concern contained in products and materials purchased and used by the company during its operations are presented below. These substances are consumed or integrated into the assets as materials, and therefore do not generate waste outflow requiring management in accordance with the regulations applicable in each case.

Furthermore, ACCIONA Energía does not consolidate data on substances of very high concern, as it has not identified any sources containing or releasing them:

Resource	Substance of concern contained	Quantity of substance of concern acquired (kg)
Concrete (precast, recycled, etc.)	1,2-benzisothiazole	783,125
	5-chloro-2-methyl-4-isothiazolin-3-one [EC No. 247-500-7] and 2-methyl-2H - isothiazole-3-one [EC no. 220-239-6] (3:1)	783,125
	Portland cement, chemicals	113,553,127
	Octhilinone (ISO)	783,125
	Ethylene oxide	78,313
Stationary (commercial, institutional, residential, industrial, construction and process), marine and land mobile diesel	Diesel	981,294
Petrol	Petrol	402,877

The calculation methodology is based on an exhaustive analysis of the origin of substances of concern and substances of very high concern present in ACCIONA Energía's activities from the resources acquired, including fuels.

To this end, 97% of the resources consumed en masse and 100% of the fuels used in 2024 have been assessed.

The calculation was based on a detailed review of the safety data sheets of each resource, identifying the quantity and concentration of the relevant substances. Based on this information, a specific emission factor has been defined for each unit of resources or fuels consumed and for each substance identified, ensuring a precise approach aligned with best practice in environmental management.

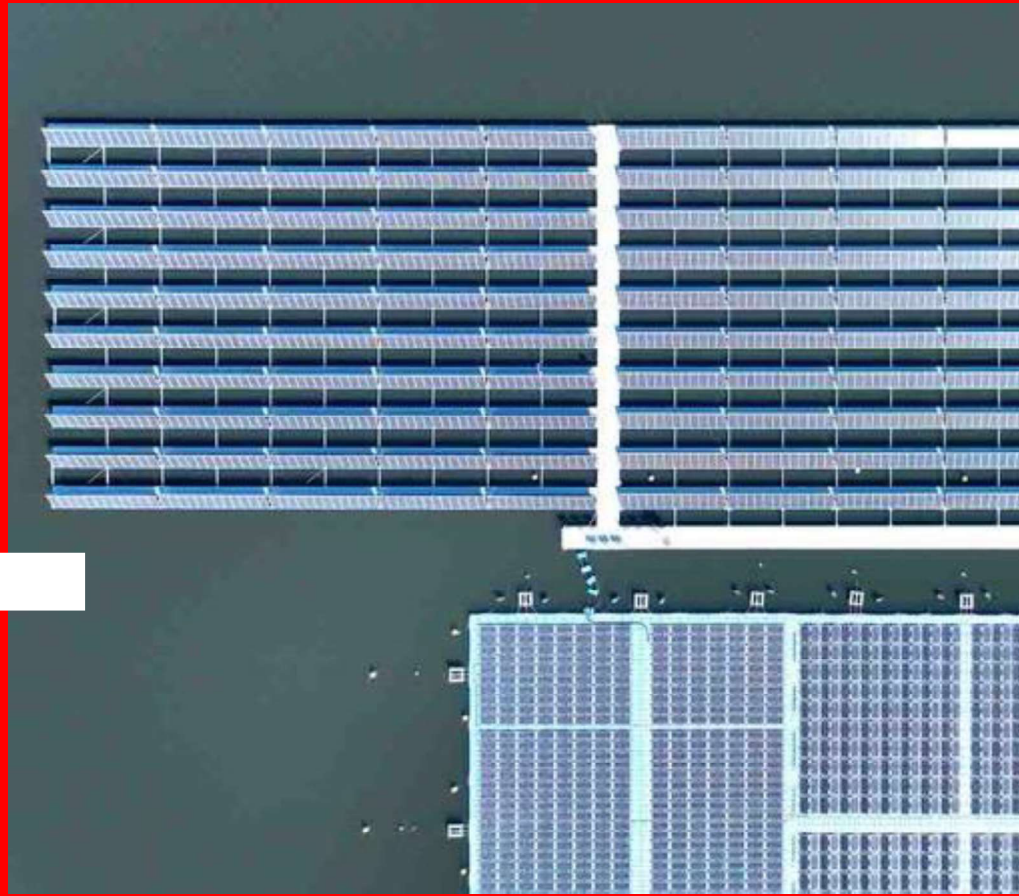
[E2-6] ANTICIPATED FINANCIAL EFFECTS FROM POLLUTION-RELATED RISKS AND OPPORTUNITIES.

Based on the sustainability risk management system, the potential financial effects of pollution-related risk scenarios have been analysed:

ANALYSIS OF PHYSICAL AND TRANSITIONAL RISKS FROM WATER, AIR AND SOIL POLLUTION

No.	Scenario / Timeline	Category and subcategory	Description	Exposure	Vulnerability	Risk management
1	<i>TNFD: Go fast or go home</i> Assessed to 2030	Transitional risk: Policy and legislation	Imposition of fines for possible soil pollution due to accidental spills	Unlikely	Serious [1.25%-2.5% fall in gross revenue]	ACCIONA Energía implements measures to prevent and minimise environmental impacts, adopting appropriate technologies, establishing barriers and controls in sensitive areas, and carrying out regular monitoring to ensure compliance with environmental and safety standards.

4



E3 Water and Marine Resources

Impact, risk and opportunity management

Metrics and targets



E3 Water and Marine Resources

DISCLOSURE REQUIREMENTS

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WATER AND MARINE RESOURCES

[E3-1] POLICIES RELATED TO WATER AND MARINE RESOURCES

[E3-2] ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

METRICS AND TARGETS

[E3-3] TARGETS RELATED TO WATER AND MARINE RESOURCES

[E3-4] WATER CONSUMPTION

[E3-5] ANTICIPATED FINANCIAL EFFECTS FROM WATER AND MARINE RESOURCES-RELATED IMPACTS, RISKS AND OPPORTUNITIES

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WATER AND MARINE RESOURCES

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy that is developed in accordance with the guidelines established by the due diligence process (set out in GOV-4). Based on the material issues resulting from ACCIONA Energía's Materiality Analysis (Annex I), the potential impact, risk and opportunity situations are expanded and comprehensively assessed, enabling the management and remediation of those that exceed the tolerance thresholds classified as acceptable.

Water and marine resource aspects are integrated into the ESG Risk and Impact Management Procedure in such a way that all projects are assessed in terms of exposure (likelihood) and vulnerability (economic consequence) for risk situations and in terms of exposure (likelihood) and magnitude (severity) for environmental impact situations.

This procedure is carried out annually and results in the categorisation and prioritisation of risk and impact situations, which are analysed in order to implement the necessary management and remediation measures. This reduces the exposure and vulnerability of different locations and supply chains to water scarcity, declining water availability and quality, changing patterns of water consumption and demand, new regulations and restrictions on water access and use. (More information on the governance of sustainability risk management and internal controls can be found in [GOV-5]).

Impacts related to water and marine resources can affect people and surrounding communities as well as the environment. ACCIONA Energía therefore considers the affected communities to be a material issue according to the results obtained in the Materiality Analysis. Among the systems for identifying, assessing and mitigating pollution, ACCIONA Energía maintains open dialogue with the affected communities on the impacts derived from its business activity, as established in section S3-2.

The quantity, quality and availability of water resources are influenced by factors such as precipitation, temperature, land use, land management, and the geopolitical situation, determining the sufficiency or scarcity in relation to the possible needs of ecosystems, communities and economic activities.

ACCIONA Energía therefore evaluates its interaction with water resources from the point of view of both dependencies and impacts, both of which can result in potential material risks and opportunities for the company.

Sites with direct interaction with nature in terms of water resources are located considering the consumption indicators, the classification and origin of the water bodies, the reported incidents regarding the direct impact on these resources (More information in chapter E2. Pollution) and the presence or proximity to protected aquatic areas (More information in chapter E4. Biodiversity and Ecosystems). These criteria are aligned with the Water Framework Directive (2000/60/EC) and are implemented through national regulations in the operation of the sites.

Activities such as hydropower production have a potential dependence on the regulation of rainfall patterns. This dependence does not stem exclusively from the water resource itself, but from changes in water availability patterns caused by climate change, which have arisen over the last 50 years.

In relation to the change in freshwater use, potential material impacts on hydropower production stand out. ACCIONA Energía does not identify any dependence on marine resources due to the nature of its activity.

In 2024, sites where there is an interface with natural water bodies accounted for 22% of the total number of ACCIONA Energía project sites, with these activities classified as: renewable electricity generation (hydro and biomass). Of these, 8 are located in one of the 100 priority or vulnerable water basins identified by the UN Global Compact and the Pacific Institute.

ACCIONA Energía currently has two methodologies for the quantification of facilities located in countries or areas with water stress, which allows it to evaluate endogenous and exogenous water factors that could impact the company's operations and services.

First, the UN Food and Agriculture Organization (FAO) methodology states that an area is water-stressed when the availability of annual water supply is less than 1,700 m³ per person. Under these conditions, ACCIONA Energía has 10 centres (3% of the total of its facilities) in water-stressed countries, including Egypt, India, South Africa and Poland.

Furthermore, the Water Risk Analysis tool of the World Resources Institute (WRI) allows local identification and classification in seven levels of water stress. ACCIONA Energía's 318 sites, evaluating only those operating centres (without services), geo-referenced and consolidated according to the financial perimeter, have been classified according to this methodology. This analysis makes it possible to prioritise actions in centres where water supply represents a strategic dependency and where water scarcity could pose a risk to supply:

Water stress category	No. of sites
Extremely high (>80%)	72
High (40-80%)	56
Medium - High (20-40%)	109
Low - Medium (10 -20%)	45
Low (<10%)	31
Aridity and low water consumption	5

Of the total number of ACCIONA Energía sites with water consumption, 40% are located in areas with high water stress (high and extremely high).

However, according to the analysis of potential dependencies in ACCIONA Energía's economic activities [E4 - DEPENDENCY ANALYSIS], the percentage of dependence on water resources due to water availability decreases to 9%. This is because it is not a material resource in most installations and responsible use and management plans and systems of this resource are prioritised.

With regard to the assessment and management of water-related risks and opportunities, site-specific analyses and historical performance records are used to identify and monitor those territories most likely to be affected by regulatory changes and those types of projects most prone to such incidents, with the greatest potential for significant environmental impact.

The scenarios developed by the Taskforce on Nature-related Financial Disclosures (TNFD) have been used as a basis to identify and assess the risks and opportunities associated with the interactions between ACCIONA Energía's operations and the fundamental components of nature, such as biodiversity, water, soil and climate.

The main scenarios include: "Ahead of the Game", which proposes a proactive and coordinated approach to nature conservation, driven by successful carbon policies and social pressure for transparency regarding impacts on nature; "Go Fast or Go Home", characterised by rapid and severe impacts on ecosystem services, forcing companies to act urgently and boldly to avoid criticism for insufficient commitments; "Sand in the Gears", where conflicting signals and a lack of coherence in policies and markets hinder systematic action, despite significant impacts on ecosystems; and "Back of the List", in which the global priority focuses on carbon, relegating nature risks, with slow progress on standards and reporting models.

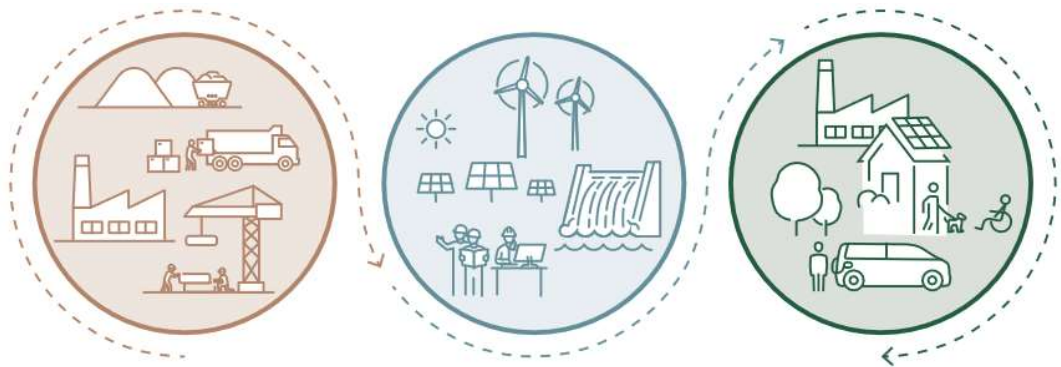
In this context, and given ACCIONA Energía's technological and geographical diversity, the strategy is adapted to address the most challenging scenarios, ensuring robust planning and alignment with its commitment to sustainability, prioritising the dynamics that present the greatest challenges for natural systems and the human activities dependent on them.

The complete results are integrated into ACCIONA Energía's Risk Management System and are submitted to the Board of Directors through the Audit and Sustainability Committee to determine whether the level of risk is tolerable following the governance previously presented ([GOV-5]).

The rating criteria for the indicators identifying risk and opportunity scenarios and situations are detailed below. These are common to any risk assessment and management process carried out at ACCIONA Energía.

Indicator	Score	Quantitative scoring	Criteria
Exposure (Likelihood)	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1-5]	Percentage drop in sales / EBITDA / EBT.

Impacts, risks and opportunities identified



Sub-topics	Upstream Value Chain	Own Operations	Value Chain: Downstream
Consumption (surface and underground)		NI - Water consumption in operation	
Influents and effluents		R - Freshwater availability	
Marine Consumption		Non-material	

Caption:

NI - Negative impacts

PI - Positive impacts

R – Risks

O – Opportunities

+ More information: [Annex I Dual Materiality](#).

1. A total of 4 issues have been identified, of which 2 have been considered as material with potential impact on water resources. All material issues identified would have an impact in the short term and are generated in own operations.

NEGATIVE IMPACTS

- Water consumption in operation

Water consumption in biomass plants is significantly higher compared to other renewable generation technologies, such as wind or solar, due to the processes required for cooling during operation.

However, this consumption is significantly lower than that used in other fossil fuel or nuclear power generation technologies.



RISKS

- **Freshwater availability**

Water availability is crucial for hydropower production and the efficient operation of certain assets such as biomass plants. Water availability can limit the ability to operate adequately, increase operational costs or delay projects, directly impacting the long-term sustainability and viability of operations.



[E3-1] POLICIES RELATED TO WATER AND MARINE RESOURCES

WATER POLICY

PURPOSE

ACCIONA Energía's Water Policy establishes the framework for managing water and marine resources. This policy defines the principles of responsible business conduct that guide due diligence related to water consumption, abstractions and discharges.

ACCIONA Energía recognises water as a limited, irreplaceable and essential natural resource that requires tools to guarantee its quantity, availability and quality in the long term, especially in the most vulnerable local communities with high water stress.

The organisation's Water Policy is developed according to the main international agreements and conventions that promote the protection and conservation of water, contributing to the commitments of the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

SCOPE

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

PRINCIPLES

The Water Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Damage prevention:** ACCIONA Energía undertakes to prevent and avoid adverse effects on the water environment caused by pollution, the use of chemicals, substances of concern or very high concern, or the overexploitation of the resource from its operations, even in locations where there is no regulatory framework in this regard.

- **Preservation and conservation:** ACCIONA Energía is committed to the preservation of water resources, promoting the use of reclaimed water and ensuring that it is returned to the environment under compatible conditions and without altering the water environment in which its facilities are located. In addition, it actively contributes to the conservation of water resources, due to the high efficiency in water consumption of renewable energies in general, and of wind and photovoltaic technology in particular, compared to non-renewable technologies.
- **Positive Impact:** ACCIONA Energía promotes an approach that goes beyond mitigating negative impacts, aware of the need to increase the quantity and quality of water resources, especially in areas of high water stress. This approach is applied throughout the life cycle of projects, with the aim of generating a positive impact that we call regenerative.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The Water Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to facilitate consultation by stakeholders¹⁷.

The Water Policy derives from the Environmental Policy, which establishes the principles for preventing and mitigating water, air and soil pollution, as well as the mechanisms necessary to implement the due diligence process in ACCIONA Energía's operations. These mechanisms include the identification, assessment, management and remediation of dependencies, impacts, risks and opportunities related to key sustainability issues. In addition, the Water and Marine Resources Policy is interrelated with the Climate Change, Biodiversity and Circular Economy policies, comprehensively covering the preservation of the environment and the sustainability of water resources.

This policy has been approved by the Audit and Sustainability Committee of the company's Board of Directors, the body responsible for overseeing compliance with sustainability standards in the environmental, social and corporate governance areas. This Committee also ensures adherence to internal codes and codes of business conduct.

The Water Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which the company operates.

[E3-2] ACTIONS AND RESOURCES RELATED TO WATER AND MARINE RESOURCES

ACCIONA Energía, within the scope of its Environmental Management System, implemented and certified in accordance with international standard UNE-EN ISO 14001, has a methodology designed to

identify and evaluate environmental impacts generated throughout the entire cycle of the company's facilities.

This includes the performance of Environmental Impact Assessments when developing new facilities, as well as the development of a Life Cycle Assessment based on ISO14040 to consider aspects related to the acquisition of materials and generation/consumption of resources “from cradle to grave”.

Likewise, during the operating and decommissioning phase, a complete assessment and prioritisation of environmental aspects is carried out in order to monitor them throughout their useful life, taking into account normal operating activity and unusual operating situations.

As a result of the above analyses and applicable administrative and legal requirements, ACCIONA Energía dedicates resources and carries out a series of actions aimed at:

Category	Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current (or future) financial resource link to financial statements (staff costs, investments in equipment, etc.)
Avoiding the use of water resources	Water use efficiency: reduction of municipal water consumption in water-stressed environments through water collection from alternative sources (rainwater harvesting and storage and fog water harvesting), in India (Bannur and Tupadahalli) and Chile (Punta Palmeras).	<p>Damage prevention: By reducing municipal water demand in water-stressed areas, overexploitation of natural sources is avoided and adverse impacts on the water environment are prevented.</p> <p>Preservation and conservation: Encouraging the use of alternative sources (rain and fog) contributes to the conservation of available freshwater. Positive impact: These innovative solutions increase water availability in vulnerable regions, generating a regenerative effect on local ecosystems.</p>	Own operations	Present	Financial	The investments made for these actions were mainly implemented in previous years. In 2024, this was €1,339
Water regeneration and reuse	Use of treated water from the Briviesca Wastewater Treatment Plant (WWTP) in the cooling system of the biomass plant. To guarantee the quality of the water used, a tertiary treatment (ultrafiltration) is	<p>Damage prevention: Ultrafiltration ensures that reused water does not generate pollution or negatively affect the water environment.</p>	Upstream value chain, Own operations	Present	Financial	The investments made for this action were mainly implemented in previous years.



applied in addition to the treatment that the water receives at the WWTP.	<p>Preservation and conservation: The use of reclaimed water is encouraged, reducing the abstraction of natural water resources.</p> <p>Positive impact: By reusing water instead of using new sources, it contributes to improving the efficiency of the water cycle and to the regeneration of the resource.</p>			In 2024, costs (in terms of energy consumed to carry out the treatment) came to €183,000.
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METRICS AND TARGETS

[E3-3] TARGETS RELATED TO WATER AND MARINE RESOURCES

ACCIONA Energía's priority is to promote sustainable development by optimising the use of water resources, focusing on reducing consumption in regions facing severe water stress conditions. This effort is fully aligned with the principles of the Sustainability Master Plan (SMP) and is a key element of its business strategy, responding to global environmental challenges. The SMP transforms the regenerative and ethical spirit of policy into practical and adaptive voluntary approaches.

The scope of the commitment includes all facilities within ACCIONA Energía's perimeter, ensuring a uniform implementation of the initiatives.

ACCIONA Energía's target is to reduce its water consumption in water-stressed countries by 14% by 2025, based on the 2,069 m³ consumed in 2020. This commitment is complemented by an intermediate target of a 13% reduction in this consumption by 2024, allowing for assessment points that ensure continued progress and adaptation of strategies as necessary.

ACCIONA Energía's water strategy is based on the methodology established by the FAO, which defines water stress in a region as water availability of less than 1,700 m³ per person per year. This approach allows ACCIONA Energía to adapt its goals to the specific conditions of each region where it operates, while ensuring alignment with international standards. Developed as an internal priority within the SMP, it has maintained its methodological basis, objectives and processes without the need for adjustments since its inception, allowing for consistent and rigorous evaluation of the results achieved.

ACCIONA Energía monitors water consumption data every six months, consolidating this information to evaluate its performance against the established targets. This detailed analysis provides the basis for identifying variances and making proactive adjustments, ensuring transparent and aligned progress towards sustainability goals.

Water use targets were defined as an integral part of the company's Sustainability Master Plan. It was developed with the support of external groups, our own employees, as well as benchmark reporting indices such as CDP, who contributed their experience and knowledge to ensure a robust approach aligned with international best practices.

[E3-4] WATER CONSUMPTION

ACCIONA Energía manages water resources comprehensively, monitoring the indicators that will enable it to continuously assess and oversee the amount of water consumed throughout its different operations and supply chains.

Influents

ACCIONA Energía operates in multiple countries, adapting water collection to different sources - surface, ground, municipal and others - according to local conditions and resource availability.

As part of its commitment to sustainable water management, ACCIONA Energía had a total of 1,338,742 m³ of water inflows at its facilities during 2024. A total of 96% of water inflows occur in biomass and solar thermal which use surface, recycled sewage treatment plant and municipal water.

In 2024, ACCIONA used 405,548 m³ of recycled water in its own facilities, optimising the use of water resources and significantly reducing the need for new water sources.

	2020	2021	2022	2023	2024
Influents (m³)					
Raw water entering the treatment plant	0	0	0	0	0
Drinking water purchased for supply networks	0	0	0	0	0
Seawater harvesting	0	0	0	0	0
Groundwater abstraction	4,979	2,308	3,451	3,500	7,821
Surface water collection	474,708	501,407	423,599	343,132	413,127
Municipal	477,442	446,417	482,872	473,352	511,475
Recycled from an external network	490,253	487,073	499,175	255,467	405,548
Rainwater harvesting	400	355	358	508	771
Total	1,447,781	1,437,559	1,409,455	1,075,959	1,338,742



Consumption

ACCIONA Energía is aware of the use of water in certain renewable generation processes that require cooling. Therefore, the use of sources that do not deplete the available natural reserves is promoted, so as to supplement water consumption and strengthen the protection of ecosystems. In 2024, the total water consumed by ACCIONA Energía's facilities and projects amounted to 1,070,930 m³, of which 3,471 m³ were consumed in water-stressed countries (India, Poland and South Africa). In India, an atmospheric water harvesting system has been installed at the Tupadahalli plant.

Water consumption (m³)	2020	2021	2022	2023	2024
Total consumption	1,447,781	1,437,559	1,409,455	1,075,959	1,070,930
Consumption in water-stressed countries	2,069	1,340	1,132	1,869	3,471
Consumption in areas of high water stress	NA	NA	NA	NA	1,019,973

*Due to the methodological change implemented in 2024 to comply with ESRS E3 requirements, water consumed is calculated as the difference between the quantities of effluent and influent. For previous years, the methodology considered influent water as consumed water. It is not possible to recalculate historical data according to the new requirements, therefore, for 2023 and prior, data calculated according to the previous methodology are presented.



On the other hand, transferred water refers to the volume of water that flows through an installation without undergoing significant changes in quality and flow rate (same volume of inflow and outflow). Of ACCIONA Energía's activities, electricity generation in hydroelectric plants and one of the biomass plants, which has open-circuit cooling, were the ones that carried out water transfers. In total, in 2024, water transfers accounted for a volume of 24,548,858,737 m³.

Furthermore, ACCIONA Energía has calculated the water consumption (surface and groundwater) associated with its suppliers, resulting in just over 2.06 hm³ for its direct suppliers and 12.97 hm³ for its entire supply chain.

Stored water

Water stored in reservoirs of hydroelectric power plants where temporary storage is necessary for the continuity of the systems are excluded from the consolidation of stored water.

Effluents

At ACCIONA Energía, effluents correspond to the volume of water used in its processes and facilities that is subsequently discharged into the natural environment (public water domain) or into sewage infrastructures. All of this effluent is considered effluent water, i.e., water whose quality has fallen compared to the inflow and which is returned to the environment or to the sewerage system.

Biomass and solar thermal power plants require water for cooling processes. This results in a slight increase in water temperature at the outlet of the process and variations in the concentration of salts. However, all of the company's discharges comply with the criteria of the corresponding environmental authorisations, guaranteeing minimum alterations to the physico-chemical conditions of the water.

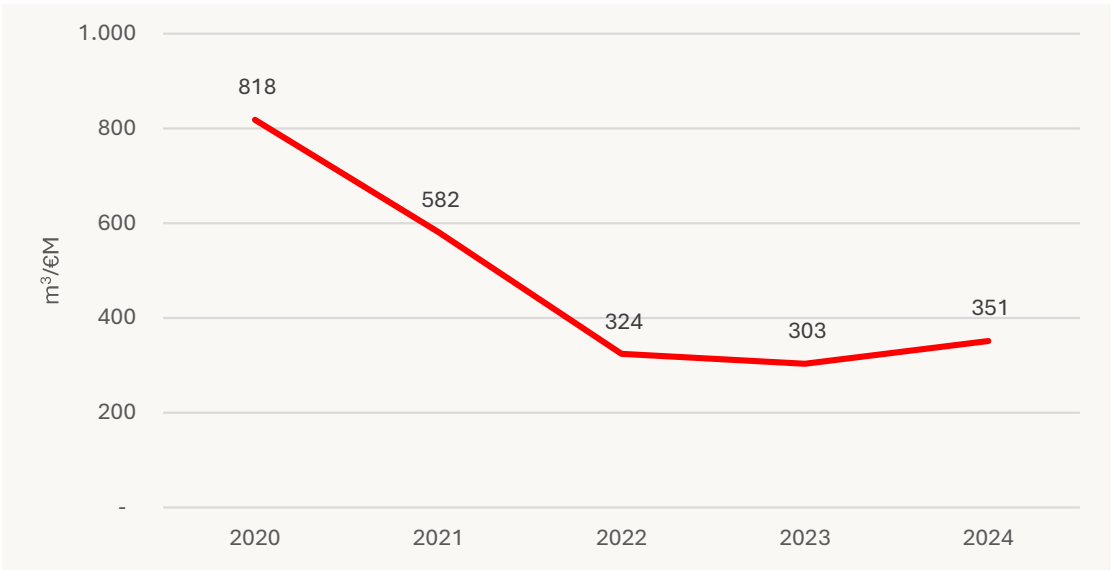
In 2024, ACCIONA Energía managed a total of 268,806 m³ of water leaving its facilities.

Effluents (m³)	2020	2021	2022	2023	2024
Treated water discharged to surface water	0	0	0	0	0
Treated water discharged into the sea	0	0	0	0	0
Reclaimed water	0	0	0	0	0
Primary network water distribution	0	0	0	0	0
Drinking water	0	0	0	0	0
Desalination plant water	0	0	0	0	0
Discharge into the sea	0	0	0	0	0
Discharge to surface water	321,077	325,615	312,501	236,544	252,946
Discharge into the sewer system	14,572	11,889	13,223	16,061	15,860
TOTAL	335,649	337,504	325,724	252,605	268,806



Water Intensity

Water intensity represents the ratio of water consumption per unit of activity, product or any other metric of the company in which it is invested. In 2024, this intensity resulted in 351 m³/€M.



The increase in water intensity is due to a slight increase in water consumption and a 14% reduction in net revenue.

[E3-5] ANTICIPATED FINANCIAL EFFECTS FROM WATER AND MARINE RESOURCES-RELATED IMPACTS, RISKS AND OPPORTUNITIES

Based on the Sustainability Risk Management System, the potential financial effects of risk situations and opportunities associated with water resources have been analysed:

No.	Scenario / timeline	Category and subcategory	Description	Exposure	Vulnerability	Risk management
1	<i>TNFD: Sand in the gears</i> Assessed for 2030	Physical Risk: Chronic	Operational and financial risk linked to the dependence on water resources, both for hydroelectric power generation and for the proper functioning of certain assets (such as biomass), as well as the construction of new projects in the development phase. Water scarcity could jeopardise these processes, increasing costs and affecting the profitability of these processes.	Possible	Slight [Decrease between 0.25 % and 0.5 % of the financial result]	Diversify the use of alternative renewable energy sources and optimise water use in existing assets; implement water variability strategies, such as storage and improved construction efficiency, thereby reducing water dependency and operational and financial risk.

5



E4 Biodiversity and Ecosystems

Strategy

Impact, risk and opportunity management

Metrics and targets

E4 Biodiversity and Ecosystems

DISCLOSURE REQUIREMENTS

STRATEGY

[E4-1] TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

[E4-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND THE BUSINESS MODEL

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

[E4-6] ANTICIPATED FINANCIAL EFFECTS FROM BIODIVERSITY AND ECOSYSTEM-RELATED IMPACTS, RISKS AND OPPORTUNITIES

[E4-2] POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

[E4-3] ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

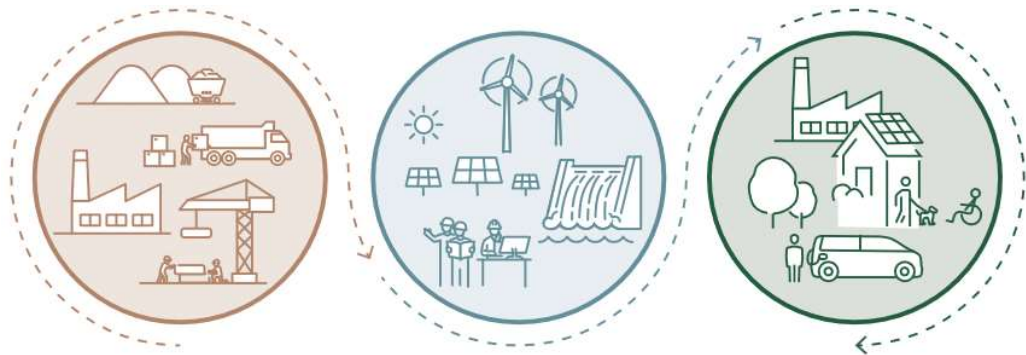
METRICS AND TARGETS

[E4-4] TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

[E4-5] IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE

STRATEGY

[E4-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND THE BUSINESS MODEL



Sub-topics	Upstream Value Chain	Own Operations	Value Chain: Downstream
Loss of biodiversity		NI - Changes in the use of land PI - Coexistence with the original land use PI - Reinforcement of affected species	
State of the species		NI - Impact on birds and bats	
Extent and state of ecosystems		NI - Water and soil pollution NI - Intervention in the natural landscape	
Dependence on ecosystem services		NI - Water dependency NI - Agricultural/forest biomass dependency. R - Agricultural/forest biomass dependency	
Other		R - Reputational damage R - Distorted perception of the sector	

Caption:

NI - Negative impacts

PI - Positive impacts

R – Risks

O – Opportunities

More information: [Annex I Dual Materiality](#).

ACCIONA Energía has identified and assessed the positive and negative impacts, risks and opportunities in relation to the biodiversity issue. In this respect, it has followed a systematic approach in line with CSRD requirements, details of which can be found in Annex I (with hyperlink) of this report. The process carried out yielded the following results:

NEGATIVE IMPACTS

12 biodiversity-related issues have been identified, of which 6 are considered material. In relation to negative impacts, 4 are potential and only 2 actual. Only one of these is a potential long-term negative impact.

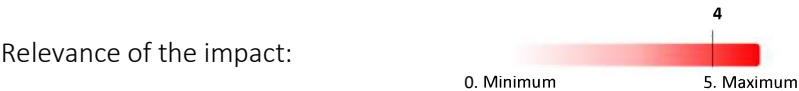
- Changes in the use of land

The construction of renewable energy infrastructure can have a negative impact on land use, causing deforestation and loss of vegetation cover, which affects the existing ecosystem and species.



- Water and soil pollution

Renewable assets can generate water and soil pollution due to possible spills of chemicals used in maintenance, industrial waste such as batteries or materials from turbines and solar panels, and accidental leakage of oils or lubricants. These incidents can affect local fauna, flora and ecosystems if not properly managed.



- Impact on birds and bats

Wind technology can affect birds and bats due to collisions with wind turbines, alter their habitats and cause changes in their migratory routes.



- Intervention in the natural landscape

Renewable energy installations, like any man-made structure, modify the natural landscape, affecting soil and vegetation due to land development, construction of foundations, roads and other elements. This can lead to environmental degradation and disruption of local ecosystems.



- Water dependency

In the case of biomass plants, the water needed for cooling can put pressure on local water sources,

especially in regions with water scarcity. In hydroelectric power plants, the intensive use of water to generate energy can affect the flow of rivers and aquatic ecosystems, harming local fauna and flora, as well as modifying the natural water cycle.



- **Agricultural/forest biomass dependency**

Dependence on the agricultural and forest biomass as a source of energy can have negative impacts by putting pressure on natural ecosystems and agricultural resources if not properly managed. Unsustainable forest management can contribute to greenhouse gas emissions, offsetting the environmental benefits of renewable energy.



POSITIVE IMPACTS

ACCIONA Energía has identified 2 material issues with positive impacts on the natural environment, which are closely linked to its strategy and business model. These actions, related to renewable generation activities, are carried out in the short term within the company's own operations and contribute significantly to the regeneration and preservation of the natural environment.

- **Coexistence with the original land use**

Wind farms and photovoltaic farms allow the original land use to be maintained to a large extent while the power generation activity takes place. Unlike traditional energy infrastructures, such as fossil fuel plants, wind turbines and photovoltaic panels can be integrated into agricultural or livestock land, making both uses compatible.



- **Reinforcement of affected species**

It encompasses activities for the preservation and enhancement of vulnerable or affected species to strengthen their richness and abundance in the ecosystem. It also includes reforestation and ecosystem restoration activities.



RISKS

4 biodiversity-related issues have been identified, of which 3 are considered material. These material issues represent potential short-term risks affecting the company's own operations.

- **Reputational damage**

Any negative impact on the environment or communities can lead to litigation and sanctions, affecting the credibility and trust in the company. This can not only lead to financial losses through fines, but also damage corporate image, reducing public acceptance, competitiveness and growth opportunities.



- **Distorted perception of the sector**

If the renewable energy industry is perceived as detrimental to biodiversity and ecosystems, it may face growing social and media opposition. This may result in loss of customers, reduced investor confidence and difficulties in obtaining permits and financing for new projects.



- **Dependence on forest/agricultural land**

Dependence on agricultural and forest biomass implies a risk of resource availability, especially in the face of land use changes, environmental regulations and climate change effects. If the supply of biomass is affected, power plant operations may become unstable and economically unviable.



Resilience analysis of the business model and strategy

ACCIONA Energía identifies the impact of operations on vulnerable species, the occupation of and interaction with protected areas and sensitive biodiversity zones, and the widespread degradation and loss of biodiversity as a material issue. The results obtained are incorporated into the annual analyses of performance and management of impacts, risks and opportunities in the different projects. This is explained in more detail in sections [GOV-4], [GOV-5], [E4-1] and [IRO-1].

The due diligence approach ensures that these analyses are carried out in all of the company's territories and activities, so that there is full representation of both the sectors in which it participates and the local characteristics and value chains involved.

ACCIONA Energía ensures the resilience of its business model by integrating sustainability principles and aligning with international frameworks such as the Kunming-Montreal Global Biodiversity Framework and the Sustainable Development Goals. In this context, the company sets ambitious

targets that strengthen the commitment to nature conservation, contributing significantly to the global targets to halt biodiversity loss by 2030 and move towards a biodiversity net gain by 2050.

This results in a strategic approach focused on the protection and conservation of biodiversity and the ecosystems surrounding the operations at its 318 sites, as well as the dissemination of its ambitions and practices throughout the value chain. A total of 122 sites have been identified with some impact on biodiversity or ecosystems, mainly associated with some impact on local fauna or flora populations. Of these sites, 39 are within or close to protected areas or key biodiversity areas.

A specific exposure and vulnerability analysis reveals that approximately 13 have potential material risks related to biodiversity and ecosystems. However, given that these sites have a robust biodiversity management system in place, which includes: (a) having developed impact assessments in accordance with assimilable European or national regulation, (b) having specific environmental monitoring and surveillance plans for biodiversity risk management (assessing the conservation status and protection category of affected species), (c) implementing prevention, correction and offsetting measures aligned with environmental studies and statements, requirements established by competent environmental bodies and identified impacts, these cannot be considered to be activities that negatively affect biodiversity sensitive areas.

This biodiversity management model, focused on the particular characteristics of the asset and its environment, ensures that each activity and territory of the company contributes individually to the achievement of the objectives and respects the company's global policies. The company's approach is based on the mitigation hierarchy and continuous improvement of both processes and technical capabilities.

Integrated methodologies for proactive management of impacts, risks and opportunities strengthen the company's ability to enhance its resilience. This strategy not only mitigates environmental impacts and risks, but also identifies opportunities to promote a regenerative and sustainable economic model. This resilience is assessed using the timelines defined by the Kunming-Montreal Global Biodiversity Framework:

- Short term (2025): Fulfilment of the objectives of the Sustainability Master Plan.
- Medium term (2030): Significant contribution to the global target of halting biodiversity loss.
- Long term (2050): Achieve a net biodiversity gain in all its operations.

The impacts and dependencies of the assets operated by the company can be found in the Annex to this chapter: "Analysis of potential dependencies in ACCIONA Energía's economic activities" and "Analysis of potential impacts of ACCIONA Energía's economic activities".

No material negative impacts linked to the company's activity have been identified in relation to land degradation, desertification or soil sealing.

Impacts on endangered species are presented in section "[E4-5] Impact metrics related to biodiversity and ecosystems change".

[E4-1] TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

The sustainable solutions promoted by ACCIONA Energía as a company encompass different technologies, responding to the growing demand for energy from renewable sources, capable of addressing some of the most pressing global challenges, such as climate change and biodiversity loss. The development and operation of power plants can generate impacts that result in the loss of biodiversity. However, beyond mitigating these negative effects on the environment, ACCIONA Energía sees 100% renewable electricity generation as an opportunity to mitigate the effects of climate change on biodiversity and global ecosystems.

ACCIONA Energía's current biodiversity roadmap is set out in the Sustainability Master Plan (SMP) to 2025, placing the company at a point of growth where the LEAP (Locate, Assess, Analyse and Prepare) methodology has guided the first phase of diagnosis on dependencies, impacts, risks and opportunities to lay the foundations for an effective action plan to be developed during 2025 within the framework of the preparation of the company's new Sustainability Master Plan, with a 2030 horizon.

ACCIONA Energía's objective is to develop a transition plan that embodies the regenerative approach in its activities, where the integration of nature is a distinctive part of the activities of a company that operates in a range of sectors and more than forty countries. This plan will be aligned with the overall objectives of the Kunming-Montreal Global Biodiversity Framework, establishing the transformation levers needed to ensure that its contribution is effective.

A key aspect of this transition is financing for biodiversity restoration, an area where financial instruments and regulatory frameworks are still being defined globally. ACCIONA Energía's strategy explores new financial tools to boost ecosystem regeneration and move towards not only the No Net Loss target set for 2030, but also a net gain in biodiversity.

Furthermore, the alignment of activities with the EU taxonomy and compliance with the Do No Significant Harm (DNSH) principle in its six objectives, including biodiversity, has enabled the company to access green financing, which represented 95% of total corporate debt at the end of 2024.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO - 1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

ACCIONA Energía assesses its interaction with nature in general, and with biodiversity and ecosystems in particular, both from the point of view of dependencies and impacts, both of which may result in potential material risks and opportunities for the company.

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy that is developed in accordance with the guidelines established by the due diligence process (set out in GOV-4). Based on the material issues resulting from ACCIONA Energía's Materiality Analysis (Annex I), the potential impact, risk and opportunity situations are expanded and comprehensively assessed, enabling the management and remediation of those that exceed the tolerance thresholds classified as acceptable.

Aspects related to both potential impacts on biodiversity and possible risks are integrated into the ESG

Risk and Impact Management Procedure in such a way that all projects are assessed in terms of exposure (likelihood) and vulnerability (economic consequence) for risk situations and in terms of exposure (likelihood) and magnitude (severity) for environmental impact situations.

This procedure is carried out annually and results in the categorisation and prioritisation of risk and impact situations - according to specific and common indicators - which are analysed in order to implement the necessary management and remediation measures. This reduces the exposure and vulnerability of different locations and supply chains to ecosystem degradation, biodiversity loss, decline in key ecosystem services, stricter environmental conservation regulations, new regulations, etc. (More information on the governance of sustainability risk management and internal controls can be found in [GOV-5]).

The assessment of the dependencies and potential impacts on nature of ACCIONA Energía's economic activities and categorised by the ENCORE tool follows a systematic process. As the company integrates different economic activities, the analysis starts with the assignment of materiality scores for each ecosystem service (in the case of dependencies) and for each pressure type (in the case of impacts), based on the corresponding economic activity. (See more information at the end of Chapter E4.)

Based on this initial identification, these scores are reviewed and adjusted, as well as the relationship between ecosystem services, environmental pressures and the activities they perform. This adjustment allows for a more accurate reflection of the reality of the business model and its interactions with nature. This process serves as the basis for the Materiality Analysis and the identification of IROs (Impacts, Risks and Opportunities), providing key informational support for strategic decision making. (For more details on the dependencies and potential impacts of ACCIONA Energía's economic activities, see the Annex).

In general terms, the most recurrent dependencies in ACCIONA Energía's activities are related to:

- Procurement services: biomass procurement for biomass plants and water supply service for hydropower production.
- Regulation and maintenance services: such as climate regulation for wind and solar production, regulation of rainfall patterns, water flow, soil and sediment retention and flood mitigation for the hydropower generation activity.

Furthermore, the most recurrent and greatest potential impacts on ACCIONA Energía's activities are related to emissions into the air of air pollutants linked mainly to biomass activity, changes in the use of fresh water linked to hydropower generation activity, changes in land use linked to photovoltaic activity, direct impact on species linked to wind power and the generation of solid waste linked to biomass in the operating phase.

Analysis of the interaction between ACCIONA Energía sites and biodiversity reveals the presence of facilities located in or near areas of high ecological sensitivity. This assessment makes it possible to identify possible impacts on biodiversity and establish appropriate management measures to minimise, mitigate or offset these effects, ensuring the conservation and balance of the ecosystems in which the company operates. (More information on the results of this analysis can be found in section [E4-5]).

In 2024, within the framework of ACCIONA Energía's operations, two environmental penalties amounting to €1,800 were identified in relation to compliance with certain environmental requirements. These situations occurred due to a temporary absence of a device for the visual control of the ecological flow and the use of unauthorised material in the Red Natura 2000 network. Both situations were handled immediately, ensuring regulatory compliance and reaffirming our commitment to continuous improvement.

Impacts related to the continuity of ecosystems can affect people and surrounding communities.

ACCIONA Energía therefore considers “Affected Communities” to be a material issue based on the results obtained in the Materiality Analysis. Among the systems for identifying, assessing and mitigating the degradation of ecosystems and species, ACCIONA Energía maintains open dialogue with the affected communities on the impacts derived from business activity, as established in section S3-2.

Based on this information, business risk scenarios are developed, assessed and managed. These focus on increased operational costs, difficulty in accessing finance, and the increasing complexity of permits and regulatory compliance associated with biodiversity protection due to the interaction of projects with key biodiversity areas. In addition, the degradation of strategic ecosystem services essential for the development of operations could have a significant financial impact on activities. In turn, the company identifies opportunities in the face of increasing demand for projects integrated with nature, an approach that not only optimises the environmental performance of infrastructures, but also fosters a new business model.

The scenarios developed by the Taskforce on Nature-related Financial Disclosures (TNFD) have been used as a basis to identify and assess the risks and opportunities associated with the interactions between ACCIONA Energía's operations and the fundamental components of nature, such as biodiversity, water, soil and climate.

The main scenarios include: "Ahead of the Game", which proposes a proactive and coordinated approach to nature conservation, driven by successful carbon policies and social pressure for transparency regarding impacts on nature; "Go Fast or Go Home", characterised by rapid and severe impacts on ecosystem services, forcing companies to act urgently and boldly to avoid criticism for insufficient commitments; "Sand in the Gears", where conflicting signals and a lack of coherence in policies and markets hinder systematic action, despite significant impacts on ecosystems; and "Back of the List", in which the global priority focuses on carbon, relegating nature risks, with slow progress on standards and reporting models.

In this context, and given ACCIONA Energía's geographical diversity, the strategy is adapted to address the most challenging scenarios, ensuring robust planning and alignment with its commitment to sustainability, prioritising the dynamics that present the greatest challenges for natural systems and the human activities dependent on them. Risk scenarios with a direct link to climate change are further assessed using equivalent scenarios developed by NGFS (Network for Greening the Financial System), ensuring consistency from a climate perspective. The list of the most representative risks and opportunities are set out in section [E4-6].

This analysis results in a complete assessment of its value chain, from its suppliers and raw materials (upstream) to its customers and end-users (downstream). This information has been integrated into ACCIONA Energía's Materiality Analysis, providing a holistic view of the dependencies, impacts, risks and opportunities throughout its activity.

The complete results are integrated into ACCIONA Energía's Risk Management System and are submitted to the Board of Directors through the Audit and Sustainability Committee to determine whether the level of risk is tolerable, following the governance previously presented ([GOV-5]).

The rating criteria for the indicators identifying risk and opportunity scenarios and situations are detailed below. These are common to any risk assessment and management process carried out at ACCIONA Energía.

Indicator	Score	Quantitative scoring	Criteria
Exposure (Likelihood)	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1-5]	Percentage drop in sales / EBITDA / EBT.

[E4-6] ANTICIPATED FINANCIAL EFFECTS FROM BIODIVERSITY AND ECOSYSTEM-RELATED IMPACTS, RISKS AND OPPORTUNITIES

Based on the Sustainability Risk Management System, ACCIONA Energía has analysed the potential financial effects of risk situations and opportunities associated with biodiversity. In order to present this content in a more logical and coherent way, the initial table of contents has been modified, placing the section under “Impact, risk and opportunity management” - instead of “Metrics and targets” as suggested by the ESRS E4 standard - so that the risk and opportunity analysis methodology is described first, and then the results are presented. The most representative risks and opportunities are presented below.

In 2024 ACCIONA Energía was fined €300 for the use of unsuitable gravel in the repair of a road. The situation was rectified and the lessons learned were incorporated into internal procedures to avoid recurrence.

Analysis of physical and transitional risks related to biodiversity and ecosystems

No.	Scenario/ timeline	Category	Description	Exposure	Vulnerability	Risk management
1	<i>TNFD: Go fast or go home</i> Assessed for 2030	Physical Risk: Market	Dependence on agricultural/forest biomass exposes the company to reduced availability and quality of these resources due to climate change (droughts, fires, extreme events), affecting the supply and stability of energy production.	Unlikely	Serious [1.25%-2.5% fall in gross revenue]	ACCIONA Energía implements sustainable purchasing and management strategies, diversifying supply sources to reduce dependency.
2	<i>TNFD: Ahead of the game</i> Assessed for 2030	Transitional risk: Market	Loss of reputation due to negative perception of wind farms and their impact on biodiversity and ecosystems. This could impact the company's reputation, lead to social rejection, loss of customers and reduced investor confidence.	Possible	Significant [0.5%-1.25% fall in gross revenue]	All our facilities with potential impact on protected areas and adjacent ecosystems have Specific Environmental Impact Plans and Environmental Monitoring Plans designed to ensure the preservation of local biodiversity. Through continuous monitoring and the application of best practices, we strengthen our commitment to sustainable and environmentally-friendly energy development.

[E4-2] POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

BIODIVERSITY POLICY

PURPOSE

ACCIONA Energía's Biodiversity Policy establishes the framework for the conservation and protection of ecosystems and individuals present in habitats, both marine and terrestrial, within the organisation's value chain. This Policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to the protection and restoration of biodiversity and ecosystems.

ACCIONA Energía actively contributes to the preservation of marine and terrestrial ecosystems. The organisation promotes the sustainable management and responsible use of natural capital in line with the targets of Net Biodiversity Loss by 2030 and Net Positive Biodiversity Gain by 2050.

ACCIONA Energía's Biodiversity Policy is aligned with the main international agreements and conventions on the protection and conservation of biodiversity and ecosystems, contributing to the goals and targets of the Kunming-Montreal Global Biodiversity Framework, the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

SCOPE

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

PRINCIPLES

ACCIONA Energía's Biodiversity Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Application of the mitigation hierarchy:** ACCIONA Energía is committed to carrying out the necessary actions in its operations and projects to ensure compliance with legislation and reverse the loss of biodiversity. ACCIONA Energía applies the mechanisms for mitigating adverse effects on biodiversity in accordance with the following stages:



- Prevent: Avoid adverse effects caused by pollution, overexploitation of natural resources or poor environmental protection in the course of its operations, even in locations where there is no regulatory framework.
 - Minimise: Minimise unavoidable impacts that negatively affect species and ecosystems through the implementation of the necessary corrective measures, the acquisition of local resources, and the use of certified sustainable resources, among others.
 - Restore: Recover, as far as possible, the areas affected by the development of projects or services and rehabilitate those that are degraded, providing additionality with respect to their initial state and preserving ecosystem services.
 - Offset: Implement offsetting actions where residual impacts cannot be fully mitigated, contributing to the commitment to halt Net Biodiversity Loss by 2030.
- Conservation and protection of terrestrial and marine ecosystems: ACCIONA Energía identifies critical ecosystems of high conservation value and key areas for biodiversity, which allows it to take actions aimed at improving the state of its operating environments, adjacent areas and other zones, ensuring respect for and integration of indigenous territories and local communities.
 - Preventing deforestation: ACCIONA Energía is firmly committed to Zero Net Deforestation by 2030, ensuring that its activities do not contribute to the loss of natural forests, promoting forest restoration and full offsetting of affected areas. This commitment extends to its value chain through sustainable procurement.
 - Positive impact and net biodiversity gain: ACCIONA Energía, aware of the progressive deterioration of the planet, is promoting an approach that goes beyond mitigating negative impacts. This approach integrates the entire life cycle of the project, from design to decommissioning, with the aim of generating a positive impact that we call regenerative. In this respect, the organisation promotes the recovery of lost biodiversity, both terrestrial and marine, through specifically targeted actions, to generate a net gain in biodiversity.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The Biodiversity Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

This policy has been approved by the Audit and Sustainability Committee of the company's Board of Directors, the body responsible for defining and overseeing compliance with sustainability policies in the environmental, social and corporate governance areas. This Committee also ensures adherence to internal codes and codes of business conduct.

The Biodiversity Policy derives from the Environmental Policy, which establishes the principles for preventing and mitigating water, air and soil pollution, as well as the mechanisms necessary to implement the due diligence process in ACCIONA Energía's operations. These mechanisms include the identification, assessment, management and remediation of dependencies, impacts, risks and opportunities related to key sustainability issues. Furthermore, it is interrelated with Climate Change,

Water and Circular Economy policies, addressing the conservation of natural capital in a comprehensive manner. In conjunction with other environmental policies, it establishes the necessary levers to address the main direct drivers of climate change and biodiversity loss. This is done with an understanding of social impacts and the impact on local communities as an additional component to achieve economic development and social progress.

ACCIONA Energía has not developed a specific agricultural or land use policy or a specific principle on the fair and equitable sharing of genetic resources as it does not use them directly; however, the company advocates free, prior and informed consent for access to such resources, as well as sustainable and respectful practices on the land where it operates.

This policy is publicly available and is applicable to employees and to all of the company's companies included in its global consolidation perimeter, as well as in all geographical areas where it has a presence. Likewise, the company promotes the adoption of these principles in those companies of any nature in which it has a stake without exercising management control or without having a majority shareholding. This extends, insofar as it has influence, to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

 More information: [Annex IV in: Biodiversity Policy](#)

[E4-3] ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

All projects that were developed and constructed in 2024 applied the hierarchy of mitigation measures. Specific information is provided on each of the actions within the hierarchy in the following sections.

Category	Description of actions	Contribution to objectives and goals	Scope of action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current (or future) financial resource link to financial statements (staff costs, investments in equipment, etc.)
1. Application of the hierarchy of mitigation measures: a) Preventing potential negative impacts on the construction and operation of assets	<p>During 2024, ACCIONA Energía processed or promoted 116 Environmental Impact Assessments (EIA). Of these, 45 obtained a favourable decision during the year, and the rest are in various stages of processing.</p> <p>The process consists of a first analysis called a Feasibility Study, which includes the relevant aspects to be taken into account prior to the design of the project, including (among others) existing protection figures, areas of special value for fauna, flora or habitats and protected species.</p> <p>Once the detailed design of the project is available, the relevant detailed studies are carried out to define the environmental inventory of the location.</p> <p>In the drafting of the Environmental Impact Study, the expected negative environmental effects are identified, evaluated and categorised, and the proposal and description of preventive measures (to avoid the impact) and corrective measures (to mitigate the impact) are made.</p>	<p>This action is directly aligned with the principles of “application of the mitigation hierarchy”, “conservation and protection of terrestrial and marine ecosystems” and “prevention of deforestation” of the biodiversity policy.</p>	Own operations, Upstream value chain	Present	Financial, Human	€ 7,558,705.32



<p>1. Application of the hierarchy of mitigation measures:</p> <p>b) Mitigating negative impacts on the construction and operation of assets</p>	<ul style="list-style-type: none"> In the construction phase, avoidable impacts are considered in the environmental monitoring plans and environmental management plans are established that define precautionary and preventive measures and incident control systems to detect and communicate immediate action measures and action plans to minimise effects on the environment. Field monitoring of the implementation of these plans is carried out. During the operating phase, an environmental monitoring plan is drawn up that includes the environmental conditions, the implementation of mitigation and offsetting measures, if any, and the management of legally required environmental aspects. <p>During 2024, a total of 187 environmental management, monitoring and surveillance plans were tracked at sites and facilities that were under construction, up and running or under maintenance.</p>					
<p>1. Application of the hierarchy of mitigation measures:</p> <p>c) Remedying negative impacts on the construction and operation of assets</p> <p>2. Use of biodiversity offsets and additional positive impact</p>	<p>Typically, the construction of a project involves a restoration phase that includes the restoration of land disturbed during construction and the integration of the new facility and associated infrastructure into the surrounding environment and revegetation (seeding, planting, etc.). All these actions are usually indicated in the Restoration and Revegetation Plan, and must be approved by the corresponding environmental authority.</p> <p>During construction and operation and maintenance, various offsetting measures (focused on “net-zero biodiversity loss”) and positive impact on biodiversity (focused on “net</p>	<p>This action is directly aligned with the principle of “applying the mitigation hierarchy” and the “positive impact and net biodiversity gain” principle of the biodiversity policy.</p>	<p>Own operations</p>	<p>Present</p>	<p>Financial</p>	<p>€ 877,460.25</p>

actions in construction and operation of assets	<p>gain in biodiversity”) are implemented. It consists of various types of initiatives:</p> <ul style="list-style-type: none"> - Biodiversity studies (status of fauna), monitoring and study of the evolution of populations and soil science (EP Zone 12, FV Extremadura, EP Zone 11, EP Tahivilla, EP El Chaparro, FV Bolarque, PPEE Chile, PPEE Torquemada). - Flora transplants and seed collections for planting in new recipient habitats (PE MacIntyre) - Landscape integration and reforestation measures (FV Ayora) - Measures to introduce, encourage the settlement and recovery of fauna in the environments of the assets (FV Ayora, PE Rubió, PE Tahivilla, FV Escepar and Peralejo, PE MacIntyre, and contribution to the Sierras Cazorla, Segura and Las Villas Natural Park and Primillar de Cerro Gavira). - Protection and enhancement of land outside the assets to ensure protection of wildlife species (PE MacIntyre, Ayora VF) - Installation and use of detection and deterrent devices (for bird protection) and bat repellent devices to reduce impact (PE Cabeza Morena, PE Viento de Alcalá). - Construction of fish passages and monitoring of their use (CH Lerin, CH Herrerias). - Creation of shelters to promote the breeding of herpetofauna, rodents and small mammals (FV Ayora). 					
1. Application of the hierarchy of mitigation measures: a) Preventing potential negative	<p>ACCIONA Energía participates in a system for certifying the origin of the biomass used in biomass electricity generation plants.</p> <p>The system used (SURE) ensures compliance with EU requirements (RED II) regarding the “sustainability” and residual origin of the agricultural and forest biomass used, as well as</p>	<p>This action is directly aligned with the principle of “application of the mitigation hierarchy”, with that of “conservation and protection of terrestrial and marine ecosystems” and with</p>	<p>Upstream value chain, Own operations</p>	<p>Present</p>	<p>Financial, Human</p>	<p>€ 562,323</p>

impacts on biomass supply	<p>the traceability of the biomass used throughout all links in the value chain.</p> <p>This certification system covers all biomass plants currently operating in the company. The biomass used originates in all cases in Spain, and is local to the areas where the plants are located.</p>	<p>that of “prevention of deforestation”, especially with regard to the extension of ACCIONA Energía's biodiversity policy to the value chain.</p>				
Application of local and indigenous knowledge or nature-based solutions	<p>ACCIONA Energía carries out vegetation trimming and control practices at several of its U.S. photovoltaic assets using sheep grazing instead of alternative methods involving the use of machinery.</p> <p>ACCIONA Energía planted (2,500 individuals) of native species to improve an ecological reserve degraded by human activity and strengthen vulnerable areas along the banks of the river, while providing shelter and food for the local fauna. This action was carried out on land belonging to the Maleku community, an Amerindian ethnic group in Costa Rica.</p>	<p>This action is directly aligned with the “conservation and protection of terrestrial and marine ecosystems” and with the “positive impact and net gain of biodiversity” especially with regard to the extension of the biodiversity policy value chain.</p>	Upstream value chain, Own operations	Present	Financial	<p>Cutting of vegetation by grazing: € 291,792.88</p> <p>Plantations in the Maleku community: € 14,250</p>

The company continues to further its commitment to environmental training and the development of skills in that area. In 2024, ACCIONA Energía’s employees received a total of 2,169 hours of training in areas such as climate change, environmental management systems, waste management and environmental restoration of degraded areas, among other subjects.



METRICS AND TARGETS

[E4-4] TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

ACCIONA Energía is committed to the protection and restoration of biodiversity and the target of achieving a positive impact in all of the company's projects through the application of the mitigation hierarchy and nature-based solutions. This commitment is fully aligned with the principles of the company's Sustainability Master Plan (SMP) and is a key component of its business strategy to address global environmental challenges. The SMP transforms the regenerative and ethical spirit of policy into practical and adaptive approaches.

The company is aligned with the goals of the Kunming-Montreal Global Biodiversity Framework for biodiversity loss in its projects (No Net Loss) by 2030 and contributing to Net Gain by 2050. In addition, the company aims to achieve Zero Net Deforestation by recognising the importance of reducing global deforestation, including that associated with the products and services it generates, markets and/or sells.

To this end, ACCIONA Energía not only monitors its dependencies, impacts, risks and opportunities and applies the mitigation hierarchy in all its projects, but also voluntarily undertakes to plant 540,000 trees in addition to those already contemplated as mitigation measures in projects between 2021 and 2025.

The scope of these targets includes all projects and activities within ACCIONA Energía's perimeter, which ensures consistent implementation and alignment with the company's sustainability targets.

ACCIONA Energía carries out half-yearly monitoring of progress towards its environmental targets through data collection and consolidation, which allows proactive adjustments to be made when variations are detected and ensures that the company is in line with the targets set.

The biodiversity targets were defined as an integral part of the company's Sustainability Master Plan. It was developed with the support of external groups, in-house employees and benchmark reporting indices such as CDP, who contributed their experience and knowledge to ensure a robust approach aligned with international best practice. Since its definition in 2020, the targets set out in the SMP have remained unchanged.

[E4-5] IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE

Biodiversity underpins the resilience of ecosystems and thus the stability of natural services that sustain both life and human activities. ACCIONA Energía, aware that its activity can generate pressures on nature, has integrated a rigorous assessment of the impact of its operations, aligning its strategy with the principles of the Kunming-Montreal Global Biodiversity Framework. This analysis ranges from land fragmentation to the impact on key species and habitats, enabling effective management to minimise, mitigate and offset impacts on natural capital.

The relationship between ACCIONA Energía's projects and biodiversity has been assessed using the Integrated Biodiversity Assessment Tool (IBAT), making it possible to identify the interaction of its assets with biodiversity-sensitive areas. This assessment is crucial, as ecosystem conversion and habitat

fragmentation are two of the main causes of biodiversity loss identified.

The spatial impact of the operations has been assessed using a quantitative approach, making it possible to differentiate the total footprint of the sites from the actual area with ecological impact. This distinction is key to managing land use, ensuring that infrastructure development is carried out according to sustainability criteria.

The total area of ACCIONA Energía projects assessed and their presence in biodiversity-sensitive areas is shown below.

No. of centres evaluated*	Occupied surface area (HA)	No. of centres in sensitive areas	Occupied surface area in sensitive areas	Type of centre
318	7,865	175	3,283	Renewable wind, hydro and biomass generation

*Third-party service workplaces, non-geolocated (mobile) activities and offices located in urban centres are excluded from the assessment.

ACCIONA Energía worked during 2024 on assessing more sites than in previous years to obtain, in as much detail as possible, the spatial footprint of its sites, beyond those located in biodiversity-sensitive areas.

In areas where the company's activity interacts with sensitive ecosystems, restoration and offsetting measures have been implemented to balance the impact and reinforce the functionality of the intervened habitats.

In 2024, ACCIONA Energía carried out the protection of 3,300 hectares in Australia.

Furthermore, the company identifies the species affected by its facilities according to the Red List of Endangered Species prepared by the International Union for Conservation of Nature (IUCN) or included in national conservation listings. The table below shows the number of affected species and the degree of protection according to the IUCN Red List.

IUCN protection category	Abbreviation	No of Species
Extinct	EX	0
Extinct in the wild	EW	0
Critically endangered	CR	0
Endangered	EN	0
Vulnerable	VU	7
Almost threatened	NT	2
Least concern	LC	144
Insufficient data	DD	0
Not evaluated*	NE	3
Other national listings		0

*Not Evaluated Category: including individuals whose genus and species could not be identified.

To mitigate impacts, ACCIONA Energía has protocols in place to stop wind turbines in the event of sightings of birds or bats at its wind farms. In 2024, these stoppages totalled 45,876 hours.

ACCIONA Energía has made progress in its efforts to plant an additional 540,000 during the five years of the Sustainability Master Plan. Progress with achieving this target is set out below:

The breakdown by year of the 540,000 million tree target is given below:



	2021	2022	2023	2024	2025	TOTAL
Trees planted on a voluntary basis	74,947	123,134	118,738	147,215	75,966*	540,000

*Target figure

This action will boost the management and mitigation of deforestation risks among partners, suppliers and other stakeholders.

Using ENCORE's analysis by production process as a reference, ACCIONA Energía has reassessed the materiality of these processes in relation to the dependence on ecosystem services, information that has served as a context for the materiality analysis:

DEPENDENCY ANALYSIS

Analysis of potential dependencies in ACCIONA Energía's economic activities

Ecosystem Services	ACCIONA Energía			
	Biomass energy production	Hydropower production	Solar energy production	Wind energy production
Procurement services				
Biomass procurement services	VH			
Genetic material services				
Water supply services	M	VH	L	VL
Other procurement services - Animal-based energy				
Regulatory and maintenance services				
Global climate regulation services	VL	M	H	VH
Local climate regulation services (micro- and meso-scale)	L	M	M	M
Rainfall pattern regulation services (sub-continental scale)		H		
Soil quality regulation services				
Water flow regulation services	M	VH	VL	



Soil and sediment retention services	L	VH	M	M
Air filtration services	VL			
Solid waste remediation	VL	L		
Water purification services	VL	L		
Flood mitigation services	VL	VH	M	M
Storm mitigation services	VL	M	M	M
Noise abatement services		L		VL
Pollination services				
Biological control services				
Maintenance services for breeding populations and habitats				
Other regulation and maintenance service - Atmospheric and ecosystem dilution	L			
Other regulation and maintenance service - Mediation of sensory impacts (excl. noise)		VL		VL

Caption:

VL – Very Low

L – Low

M - Medium

H – High

VH - Very High



Analysis of potential impacts of ACCIONA Energía's economic activities

Potential Impacts	ACCIONA Energía			
	Biomass energy production	Hydropower production	Solar energy production	Wind energy production
E1				
GHG emissions	M	VL	M	VL
E2				
Non-GHG air pollutant emissions	H	VL	L	VL
Disturbances (e.g., noise, light)	L	VL		L
Emissions of nutrient pollutants to water and soil				
Emissions of toxic pollutants to water and soil	L	VL	L	VL
E3				
Volume of water use	M	M	L	
Change in freshwater use	L	H		
Seabed use area				
E4				
Changes in the use of land (spatial footprint)	L	M	H	M
Introduction of invasive species				
Impact on landscape and connectivity	VL	M	L	M
Direct impact on species		VL		H
E5				
Generation and release of solid waste	L			H
Use of natural resources	M	VL	VL	VL

Caption:
VL – Very Low
L – Low
M - Medium
H – High
VH - Very High



6



E5 Circular economy

Impact, risk and opportunity management

Metrics and Targets

E5 Resource Use and Circular Economy

DISCLOSURE REQUIREMENTS

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

[E5-1] POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

[E5-2] ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

METRICS AND TARGETS

[E5-3] TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

[E5-4] RESOURCE INFLOWS

[E5-5] RESOURCE OUTFLOWS

[E5-6] ANTICIPATED FINANCIAL EFFECTS FROM RESOURCE USE AND CIRCULAR ECONOMY-RELATED IMPACTS, RISKS AND OPPORTUNITIES

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy that is developed in accordance with the guidelines established by the due diligence process (set out in GOV-4). Based on the material issues resulting from ACCIONA Energía's Materiality Analysis (Annex I), the potential impact, risk and opportunity situations are expanded and comprehensively assessed, enabling the management and remediation of those that exceed the tolerance thresholds classified as acceptable.

Aspects related to the inflow and outflow of products and materials and waste management are integrated into the ESG Risk and Impact Management Procedure, so that all projects are assessed in terms of exposure (likelihood) and vulnerability (economic consequence) for risk situations and in terms of exposure (likelihood) and magnitude (severity) for environmental impact situations.

This procedure is carried out annually and results in the categorisation and prioritisation of risk and impact situations, which are analysed in order to implement the necessary management and remediation measures. This reduces the exposure and vulnerability of different locations and supply chains to volatility in the availability of materials, restrictions on the use of non-renewable resources, new regulations on eco-design and waste management, changes in recycling and reuse standards, etc. (More information on the governance of sustainability risk management and internal controls in [GOV-5]).

Impacts related to the use or extraction of raw materials and non-renewable materials and poor waste management can affect the health of surrounding communities as well as the environment. ACCIONA Energía therefore considers the affected communities to be a material issue according to the results obtained in the Materiality Analysis. Among the systems for assessing and mitigating the intensive use of materials and the destination of waste to landfill, ACCIONA Energía maintains open dialogue with the affected communities on the impacts derived from business activity, as established in section S3-2.

The implementation of the circular economy is conditioned by factors such as the availability of material resources, the efficiency of their use, consumption patterns, available technologies, applicable regulations and market dynamics.

ACCIONA Energía therefore assesses its dependence on purchased products and materials in terms of responsibility and alternatives to resource depletion and the impacts associated with the management of products sold and materials. Both approaches identify relevant risks and opportunities for the company, facilitating the prioritisation of initiatives that promote circularity, optimise resource efficiency and reduce waste, in line with its commitment to sustainability and the circular economy.

In the context of dependencies, ACCIONA Energía analyses the resilience of its supply chains and evaluates sustainable alternatives for key resources, with the aim of guaranteeing the continuity of its operations and mitigating the associated risks and financial impacts.

In this context, the ecosystem services that are essential for maintaining the continuity of supply chains are: regulation of global and local climate helps mitigate the effects of climate change, which can directly affect resource availability. Nutrient retention and erosion protection are essential for the sustainable extraction of raw materials and land preservation.

The resources that ACCIONA Energía uses, such as concrete, steel or aluminium, are associated with high environmental impact potential. However, these impacts originate primarily from the extraction and processing activities carried out by suppliers to obtain these materials. Such work can lead to the degradation of surrounding ecosystems and a decrease in biodiversity. In addition, during the manufacture of materials such as concrete and steel, highly carbon-intensive processes generate greenhouse gas emissions that contribute to climate change.

Pressure on finite resources can lead to reduced availability for other uses. In addition, the management of waste from these materials can result in soil and water pollution if proper management practices are not implemented, generating a direct impact on local communities. In contrast, efforts to recover and recycle materials and research alternative processes to optimise use and close the cycle have a significant positive impact on the activity.

ACCIONA Energía's strategy is therefore not only limited to its direct operations, but also encompasses its supply chain, prioritising sustainable and collaborative practices with its suppliers. Through tools such as Life Cycle Assessment (LCA, of which 12 were carried out in 2024) and eco-design and consumption efficiency actions, it is possible to reduce the impact of the project from the development phase. The recovery of waste and by-products, such as slag and ash from biomasses, together with the use of sustainable materials with a percentage of recycled material, drives the transition towards a circular economy model, reducing dependence on non-renewable resources and minimising environmental impacts.

This reduces the exposure and vulnerability of different locations and supply chains to volatility in the availability of materials, restrictions on the use of non-renewable resources, new regulations on eco-design and waste management, as well as changes in recycling and reuse standards. At the same time, this approach enables the conversion of waste into valuable resources, aligning these efforts with regulatory compliance and facilitating access to sustainable financing.

The scenarios developed by the Taskforce on Nature-related Financial Disclosures (TNFD) have been used as a basis to identify and assess the risks and opportunities associated with the interactions between ACCIONA Energía's operations and the fundamental components of nature, such as biodiversity, water, soil and climate. The main scenarios include: "Ahead of the Game", which proposes a proactive and coordinated approach to nature conservation, driven by successful carbon policies and social pressure for transparency regarding impacts on nature; "Go Fast or Go Home", characterised by rapid and severe impacts on ecosystem services, forcing companies to act urgently and boldly to avoid criticism for insufficient commitments; "Sand in the Gears", where conflicting signals and a lack of coherence in policies and markets hinder systematic action, despite significant impacts on ecosystems; and "Back of the List", in which the global priority focuses on carbon, relegating nature risks, with slow progress on standards and reporting models.

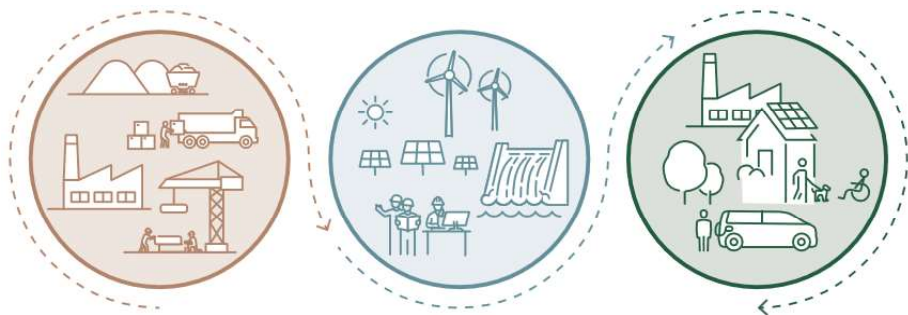
In this context, and given ACCIONA Energía's geographical diversity, the strategy is adapted to address the most challenging scenarios, ensuring robust planning and alignment with its commitment to sustainability, prioritising the dynamics that present the greatest challenges for natural systems and the human activities dependent on them.

The complete results are integrated into ACCIONA Energía's overall Risk Management System and are submitted to the Board of Directors through the Audit and Sustainability Committee to determine whether the level of risk is tolerable, following the previously presented governance ([GOV-5]).

The rating criteria for the indicators identifying risk and opportunity scenarios and situations are detailed below. These are common to any risk assessment and management process carried out at ACCIONA Energía.

Indicator	Score	Quantitative scoring	Criteria
Exposure (Likelihood)	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1-5]	Percentage drop in sales / EBITDA / EBT.

Impacts, risks and opportunities identified



Sub-topics	Upstream Value Chain	Own Operations	Downstream Value Chain
Resource inflow and use	NI - Resource consumption during construction phase	NI - Resource consumption during O&M	
Waste	NI - Waste generated during construction	NI - Waste generated during O&M NI - Waste generation during repowering of wind assets.	

Caption:

- NI - Negative impacts
- PI - Positive impacts
- R – Risks
- O – Opportunities

+ More information: [Annex I Dual Materiality](#).

A total of 9 issues have been identified, of which 4 have been considered as material with potential impact on circular economy. All material issues identified would have an impact in the short term and are generated by upstream and own operations.

NEGATIVE IMPACTS

- Resource consumption during construction phase

ACCIONA Energía considers that the high volume of inflow materials during the construction phase constitutes a negative impact due to the pressure it generates on natural resources, both biotic and abiotic. The production of key materials such as concrete, steel and glass requires large amounts of water and energy, putting pressure on the availability of these resources.



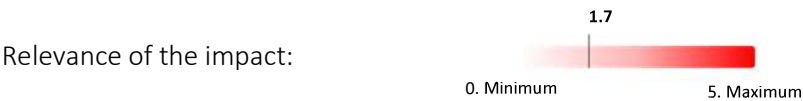
The demand for resources is mainly concentrated on the construction of foundations, towers and support structures for wind turbines, as well as the installation and manufacture of solar panels.



- **Resource consumption during operation and maintenance phase (O&M)**

Resource consumption in the operation phase of a project is usually significantly lower compared to the construction phase. During construction, large quantities of materials are required.

In contrast, the operation phase tends to be more resource efficient. At this stage, the resources consumed are usually limited to maintenance, occasional repairs and the consumption of energy required for operation.



- **Waste generated during construction and O&M**

The power plant construction phase generates significantly more waste, due to the intensive nature of the civil works and assembly processes. This includes the handling of large volumes of materials.

However, during the Operation and Maintenance (O&M) phase, waste generation is minimal compared to the construction phase. In this context, the main waste generated is associated with the generation of ash and slag in biomass plants. In addition, small quantities of waste associated with the maintenance of equipment and components, such as used oils, filters and spare parts, are generated.



- **Waste generation during repowering of wind assets**

The repowering of wind farms is a fundamental process to improve efficiency and increase the power generation capacity of existing facilities. It consists of the replacement of key components, such as turbines, solar panels and support structures, replacing obsolete ones with more advanced and efficient technology. As a result, the performance of the facilities is optimised and their service life extended, ensuring a better use of renewable resources.

While this modernisation involves the generation of waste due to the replacement of equipment, its impact is outweighed by the long-term benefits. Increased production of clean energy not only contributes to the sustainability of the energy system, but also reinforces the transition to a more efficient and environmentally-friendly model. This waste can also be recovered practically in its entirety.



[E5-1] CIRCULAR ECONOMY POLICY

CIRCULAR ECONOMY POLICY

PURPOSE

ACCIONA Energía's Circular Economy Policy establishes the framework for implementing a circular resource and waste management model in a comprehensive manner. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to resource use and the circular economy.

ACCIONA Energía promotes the transition towards circular economy models that decouple economic growth from the use of virgin resources and the generation of waste. The organisation contributes to the design and implementation of processes and technologies that continue and maximise the value of resources, eliminate waste and pollution, and promote the regeneration of natural systems.

In this context, ACCIONA Energía's Circular Economy Policy is aligned with the main international agreements and conventions that promote the principles of the circular economy, contributing to the commitments of the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

SCOPE

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

PRINCIPLES

The Circular Economy Policy is based on the following principles:

- Regulatory compliance: ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- Damage prevention: ACCIONA Energía undertakes to prevent and reverse the adverse effects caused by the overexploitation of natural resources, the deficient management of waste from its operations, and the associated pollution, even in locations where there is no regulatory framework in this regard.

- Sustainable supply and use of renewable resources: ACCIONA Energía promotes sustainable sourcing and the use of renewable materials in all its activities, optimising consumption and encouraging responsible practices throughout its value chain.
- Circular design: ACCIONA Energía adopts an approach that goes beyond mitigating negative impacts, aware of the need to reduce dependence on virgin raw materials and increase the circularity of resources. This approach integrates the use of advanced tools such as Life Cycle Assessment (LCA), eco-design and digitalisation, allowing the optimisation of resources throughout the life cycle of projects, with the aim of generating a positive impact that we call regenerative.
- Maintain and reuse: ACCIONA Energía promotes the responsible use of resources with the aim of extending their useful life through predictive maintenance processes and reuse in similar activities. Where feasible, repair and refurbishment of damaged products is considered as a preliminary step to the replacement of any installation or equipment.
- Share and co-create: ACCIONA Energía promotes increased product usage time through shared-use platforms and industrial organisation models in which the product or by-product of one organisation becomes the resource of another, following the concept of "Industrial Symbiosis".
- Redistribute: ACCIONA Energía implements actions to redistribute materials and products both within the scope of its activities and those of third parties, maximising the use of secondary resources and promoting sustainable supply in its value chain.
- Regenerate: ACCIONA Energía implements renaturalisation actions in the local environments and ecosystems where it operates, promoting the regeneration of natural capital.

POLICY REVIEW AND APPROVAL

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The Circular Economy Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

ACCIONA Energía's Circular Economy Policy derives from the Environmental Policy, which, among others, establishes the mechanisms necessary to implement the due diligence process¹⁸ in ACCIONA Energía's operations. These mechanisms include the identification, assessment, management and remediation of dependencies, impacts, risks and opportunities related to key sustainability issues.

This policy has been approved by the Audit and Sustainability Committee of the company's Board of Directors, the body responsible for defining and overseeing compliance with sustainability policies in the environmental, social and corporate governance areas. This Committee also ensures adherence to internal codes and codes of business conduct.

¹⁸ Further information on the due diligence mechanisms on environmental issues in section GOV-4.

[E5-2] ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

ACCIONA Energía, within the scope of its Environmental Management System, implemented and certified in accordance with international standard UNE-EN ISO 14001, has a methodology designed to identify and evaluate environmental impacts generated throughout the entire cycle of the company's facilities.

This includes the performance of Environmental Impact Assessments when developing new facilities, as well as the development of a Life Cycle Assessment based on ISO14040 to consider aspects related to the acquisition of materials and generation/consumption of resources “from cradle to grave”.

Likewise, during the operating and decommissioning phase, a complete assessment and prioritisation of environmental aspects is carried out in order to monitor them throughout their useful life, taking into account normal operating activity and unusual operating situations.

As a result of the above analyses and applicable administrative and legal requirements, ACCIONA Energía dedicates resources and carries out a series of actions aimed at:

Category	Description of actions	Contribution to objectives and goals	Scope of action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current (or future) financial resource link to financial statements (staff costs, investment in equipment, etc.)
Increased levels of resource efficiency in the use of technical and biological materials and water	Prototype of the use of a wind turbine blade as a support beam in a photovoltaic generation asset at the Extremadura I, II and III photovoltaic plant.	<p>Maintain and reuse: Existing materials (wind turbine blades) are reused in a new function, extending their useful life and avoiding their disposal as waste.</p> <p>Circular design: A resource optimisation approach is applied through reuse in the construction of new infrastructure.</p>	Own operations	Present	Material and Staff	The investments made to implement this action were made in previous years.
Increased rates of use of secondary raw materials (recycled)	Use of second-hand Silence motorbike batteries for the construction of an electricity storage station at the Extremadura I, II and III photovoltaic plant.	<p>Redistribute: Used batteries are reused in a new application, maximising their life cycle and reducing the demand for new materials.</p> <p>Damage prevention: Generation of hazardous waste is avoided by recovering and reusing batteries instead of disposing of them.</p>	Own operations, Upstream value chain	Present	Financial and Staff	€ 1,050,000
Applying circular design and circular business practices	ACCIONA Energía is participating in the Waste2Fiber project, the aim of which is to build a plant to recover composite materials, focusing on the recycling of disused wind turbine blades.	Circular design: Recycling and recovery of composite materials is encouraged, reducing dependence on virgin raw materials.	Own operations	Short-term future	Financial	More than €15 million
	A collaboration has been carried out with El Ganso to repurpose wind turbine blades as a load-	Share and co-create: Innovation in recycling processes is promoted through partnerships	Downstream value chain	Present	Materials	The costs incurred to implement this action

	bearing/reinforcing material in shoe soles. Fibreglass from decommissioned wind turbine blades was used.	with other companies and sectors. Maintain and reuse: Composite materials from wind turbine blades are given a second life in a completely different product.				were executed in previous years.
Optimising waste management in line with the waste hierarchy	<p>Waste management in ACCIONA Energía's assets, focused on treating waste in accordance with the possibilities for recovery of each of the materials:</p> <p>A) ACCIONA Energía's integrated waste management</p> <p>B) Use of biomass combustion slag for use as a resource in other activities: agriculture, cement production, recovery of spaces, civil engineering and glass production.</p> <p>C) Maximisation of the recovery of materials resulting from asset decommissioning. In the repowering of Tahivilla (Spain), 100% of the recoverable components will be recycled.</p>	<p>Damage prevention: Waste management is optimised to reduce its environmental impact.</p> <p>Sustainable supply and use of renewable resources: The recovery of waste as a source of new materials is encouraged.</p> <p>Redistribute: Industrial by-products are reused in other economic activities, closing material cycles.</p> <p>Regenerate: Soil quality is improved by using biomass slag in agriculture.</p> <p>Industrial symbiosis (share and co-create): The use of waste as a resource in other industries is facilitated.</p> <p>Optimisation of waste management: Priority is given to recovery and recycling in the decommissioning of assets, minimising the waste generated.</p> <p>Circular design: A materials recovery approach is applied for their reintegration into the production chain.</p>	Own operations	Present	Staff, Financial	€ 2,334,533



METRICS AND TARGETS

[E5-3] TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

ACCIONA Energía is firmly committed to its circular strategy, focusing its efforts on reducing non-recovered waste and increasing the amount of renewable resources consumed in its operations. These targets are aligned with the principles of the Sustainability Master Plan (SMP), which transforms the regenerative and ethical spirit of policies into practical and adaptive approaches.

The scope of these targets, established voluntarily by ACCIONA Energía, involves all the facilities within the consolidation perimeter, focusing its efforts where it exercises control over operations while encouraging and promoting it in those where it does not. This ensures a uniform implementation of circular economy related strategies and facilitates effective monitoring of the progress achieved.

Targets also relate to increasing the rate of circular use of materials, minimisation of primary raw materials, sustainable sourcing and use of renewable resources and appropriate and sustainable waste management.

By 2025, ACCIONA aims to reduce by 50% the tonnes of non-recycled waste (including hazardous and non-hazardous) compared to 2020, with a baseline of 2,499 tonnes, and achieving an interim milestone of 40% by 2024. And to double the percentage of renewable resources consumed, starting with a baseline of 8.8% in 2020 and aiming to exceed 15.8% in 2024.

These targets incentivise the development of best practice at all levels of the waste hierarchy and help curb the loss of biodiversity exacerbated by the exhaustive use of virgin renewable raw materials and pollution from poor management of outflow resources.

Fulfilment of these objectives is monitored on a half-yearly basis through data collection and consolidation campaigns, allowing progress to be assessed and strategies to be adjusted in the event of significant deviations. This systematic monitoring ensures that the company continues to move forward in line with its circular economy targets, reinforcing its commitment to sustainable and responsible development.

Circular economy targets were defined as an integral part of the company's Sustainability Master Plan. It was developed with the support of external groups, our own employees, as well as benchmark reporting indices such as CDP, who contributed their experience and knowledge to ensure a robust approach aligned with international best practices. Since its definition in 2020, the targets set out in the SMP have remained unchanged.

[E5-4] RESOURCE INFLOWS

The main resource inflows occur mostly during the construction phase (representing 99% of the total), followed by the operation and maintenance phases. The most relevant resources at these stages are: **¡Error! Vínculo no válido.**

Concrete	Steel	Glass	Fibreglass	Aluminium
57%	31%	5%	2%	2%

On the one hand, concrete and steel, mainly present in wind turbine towers and their foundations,



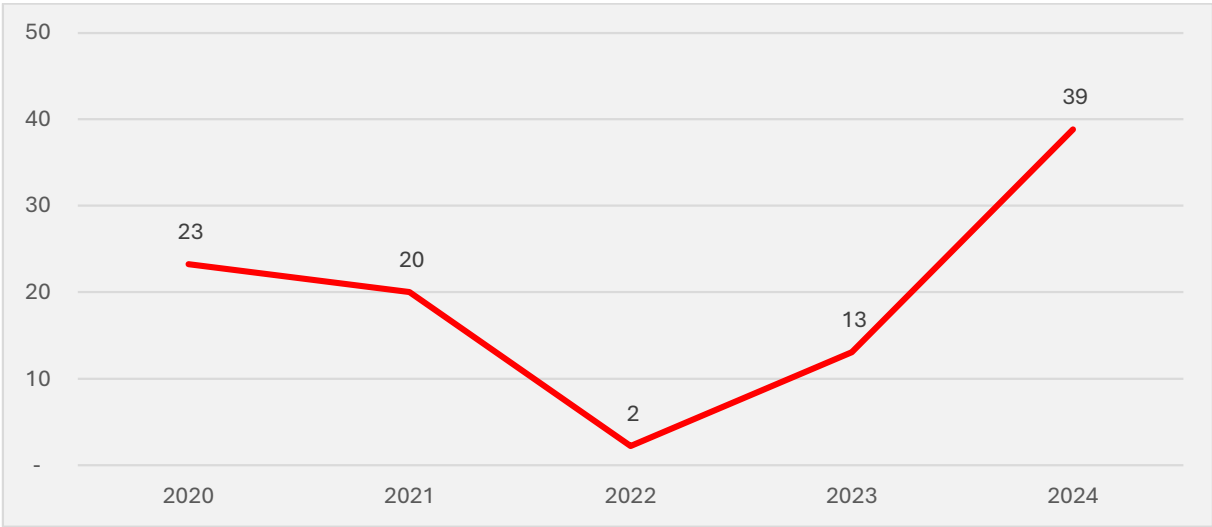
together with fibreglass present in the blades. On the other hand, glass and aluminium are mostly present in photovoltaic panels and their frames.

In 2024, total resource consumption was 596,405 tonnes, an increase on the previous year. This increase is mainly attributed to the installation of 2 GW of renewable capacity this past year. Of this volume, 16.5% of the materials used were of recycled or renewable origin, a significant increase of 7.7% over the baseline year, reflecting advances in sustainability and the integration of more responsible practices in resource procurement.

	2020	2021	2022	2023	2024
Total resources (tonnes)	248,388	225,303	26,018	176,574	596,405
Recycled or renewable resources (tonnes)	21,840	19,284	3,463	39,530	98,593
Recycled or renewable resources (%)	8.8 %	8.6 %	13.3 %	22.4 %	16.5%
Biological materials (%)	0.2 %	0.2 %	0.1 %	0.5 %	0.1%

ACCIONA Energía has not identified the use of secondary intermediate products, reused or recycled secondary components and secondary materials used to manufacture the products or services, therefore the amounts by weight for these indicators are not broken down.

Resource consumption intensity (tonnes/GW installed)



The increase in resource intensity reflects the increase in installed capacity last year compared to previous years.

ACCIONA Energía calculates the consumption of resources based on the purchases made for each project, using the accrual method. This method allows it to accurately reflect the volume of raw materials and products purchased, reinforcing its commitment to measure and mitigate the environmental impacts associated with its activities.

Quantities are recorded in the reporting systems using their original units of weight or volume.



[E5-5] RESOURCE OUTFLOWS

Waste recovery is mainly carried out through recycling, while waste disposal is carried out through controlled landfill disposal.

In 2024, 77% of the waste generated was slag and ash, of which 100% was destined for recovery, in line with the principles of the circular economy. Through these actions, ACCIONA Energía reaffirms its commitment to sustainability, prioritising waste recovery and the use of recycled materials as the cornerstones of its environmental strategy.

The composition of the waste generated is mainly as follows:

Slag	Iron and steel	Ash	Earth	Sludge	WEEE	Wind turbine blades	Other waste
73%	8%	5%	4%	4%	4%	1%	1%

Figures include decimals.

In 2024, the company's waste generation increased by 46% due to an increase in activity at the biomass plants (22% more than last year), and the repowering of the Tahivilla wind farm complex, which involved the dismantling of all its old wind turbines (6,163 tonnes). This has meant an increase in slag, sludge and ash waste from biomass plants, and an increase in iron and steel and earth from repowering and dismantling activities. The total waste recovery is 98%.

The amount of non-hazardous waste has increased by 47%. This is due to the activities described above. Only 1% of non-hazardous waste is not recovered.

The amount of hazardous waste generated has increased by 3% compared to 2023; however, the recovery rate of this waste has increased by 6 points, preventing this increase in generation from being reflected in an increase in landfill. Hazardous waste remains a tiny part of total generation, accounting for 2% of the total.

The reuse of 36,670 tonnes of slag and 2,432 tonnes of ash stands out, which is equivalent to 100% of the legally recoverable waste generated in ACCIONA Energía biomass plants. In addition, it is planned to recover 100% of the blades from the wind turbines dismantled at Tahivilla.



2024 Sustainability Report of ACCIONA Energía

	2020			2021			2022			2023			2024		
	Non-hazardous	Hazardous	Total	Non-hazardous	Hazardous	Total	Non-hazardous	Hazardous	Total	Non-hazardous	Hazardous	Total	Non-hazardous	Hazardous	Total
Waste not disposed of			-			-			-			-			-
Preparation for re-use			-			-			-			-			-
Recycled	32,211	585	32,796	34,816	549	35,365	33,800	581	34,382	33,279	459	33,738	49,089	526	49,615
Other forms of recovery			-			-			-			-			-
Waste disposed of			-			-			-			-			-
Landfill	2,335	164	2,499	1,188	86	1,274	402	234	636	531	391	922	575	348	922
Incineration			-			-			-			-			-
Other forms of disposal			-			-			-			-			-
TOTAL	34,546	749	35,295	36,004	634	36,639	34,202	815	35,017	33,810	851	34,661	49,664	874	50,538



ACCIONA Energía does not generate radioactive waste in the scope of its activities, which means this indicator in 2024 is 0 tonnes.

In relation to waste management, the quantification of waste and its final destination is determined on the basis of the collection reports issued by the waste managers assigned to each project. This documentation details the classification of the collected waste, including its further processing, whether through recovery, recycling or landfilling, etc. All these quantities are recorded in the reporting systems, using their respective original weight or volume units. In order to ensure the uniformity of the information for its correct consolidation, a catalogue of magnitudes has been implemented. This instrument has been designed to perform automated conversion from units of volume to units of mass, thus promoting accuracy and consistency in data processing.

In recognition not only of ACCIONA Energía's good waste management, but also of its efforts to recover and give waste a second life by avoiding landfilling, ACCIONA Energía has been awarded the ACCIONA Energía seals:

- **Bureau Veritas Zero Waste** - excellent category - for recovering more than 95% of the waste generated in the three biomass plants, which generate 79% of the company's total waste.
- **AENOR's 100% Circular Economy Strategy** which certifies ACCIONA Energía's contribution to Circular Economy principles, through its strategy and the implementation of circular projects.

[E5-6] ANTICIPATED FINANCIAL EFFECTS FROM RESOURCE USE AND CIRCULAR ECONOMY-RELATED IMPACTS, RISKS AND OPPORTUNITIES.

No material risks have been identified for the company in relation to resource use and the circular economy.

However, two opportunities have been identified in the area of the circular economy which, due to their limited impact on the company's profits, are currently considered non-material, but could become more significant in the coming years:

- **New circular business models.**

A. Waste2Fiber

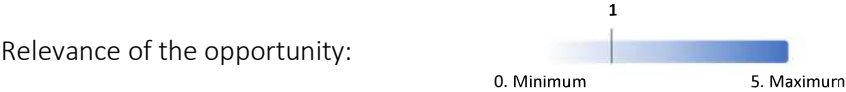
ACCIONA Energía's Waste2Fiber project consists of the construction of a pioneering wind blade recycling plant in Lumbier, Navarre. This facility will use innovative proprietary thermal technology to process up to 6,000 tonnes of material per year. The aim is to transform composite blade materials into high quality secondary raw materials, comparable to virgin materials, significantly reducing the carbon footprint compared to the production of new fibres.

B. El Ganso trainers x ACCIONA

ACCIONA Energía and El Ganso have joined forces to recycle materials from decommissioned wind blades, combining them with rubber to make the soles of a new range of sustainable trainers. The first series of this exclusive model incorporates waste from a wind turbine blade from the Aibar wind farm (Navarre).

C. Circular photovoltaic structures

ACCIONA Energía has developed a pilot project that reuses wind turbine blades at the end of their useful life to manufacture support structures for solar panels. Through a micronising process, the blades are crushed into fine particles that are combined with resin and continuous fibre reinforcement to produce structural profiles. These profiles replace steel supports in photovoltaic installations, offering a more sustainable and corrosion-resistant solution. ACCIONA Energía is currently testing this technology at its Extremadura I-II-III photovoltaic complex in Badajoz, with a view to its future trading.



- Circular biomass ash management

One of the main initiatives is the reuse of biomass slag in infrastructure construction. For example, biomass slag has been used for the construction of a biomass storage platform at the biomass plant under construction in Logrosán. This solution will improve the technical characteristics of the surface, providing a higher bearing capacity. This solution is waterproofed with a polymer to prevent possible leaching.

In addition, in collaboration with the company Vidrala, ACCIONA Energía has reused 230 tonnes of biomass slag to manufacture 18.3 million glass bottles. The slag, rich in silica, made it possible to reduce the use of silica sand and sodium carbonate in the production process, optimising manufacturing and reducing the environmental footprint.



These initiatives related to the recovery of biomass waste and the recycling of blades are reflected in cost savings in waste management.



S1 Own workforce

Strategy

Impact, risk and opportunity management

Metrics and targets

Entity-specific



S1 Own workforce

DISCLOSURE REQUIREMENTS

STRATEGY

S1-SBM-2 INTERESTS AND VIEWS OF STAKEHOLDERS

S1-SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

S1-1 POLICIES RELATING TO OWN WORKFORCE.

S1-2: PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS.

S1-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS.

S1-4 TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

METRICS AND TARGETS

S1-5 TARGETS RELATED TO MANAGING MATERIAL ADVERSE EVENTS, ADVANCING POSITIVE EVENTS AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

S1-6 CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES.

S1-7 CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE.

S1-8 COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE.

S1-9 DIVERSITY METRICS

S1-10 ADEQUATE WAGES

S1-11 SOCIAL PROTECTION

S1-12 PERSONS WITH DISABILITIES

S1-13 TRAINING AND SKILLS DEVELOPMENT METRICS

S1-14 HEALTH AND SAFETY METRICS

S1-15 WORK-LIFE BALANCE METRICS

S1-16 COMPENSATION METRICS (PAY GAP AND TOTAL COMPENSATION).

S1-17 INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS.

[ENTITY SPECIFIC] ADDITIONAL INFORMATION, INCLUDING THAT REQUIRED BY LAW 11/2018 TO WHICH THE CSRD DOES NOT RESPOND (DELEGATED REGULATION (EU) 2023/2772)

STRATEGY

[S1-SBM-2] INTERESTS AND VIEWS OF STAKEHOLDERS

ACCIONA Energía's Sustainability Master Plan (SMP) establishes as one of its fundamental levers of action to place people at the centre of its decision-making, ensuring that the needs, expectations and views of workers serve as a basis and are effectively included in the company's strategy and business model.

In this context, the views and interests of workers are taken into account through initiatives such as the Engagement & Sustainability Global Barometer detailed later in this chapter.

PEOPLE is the global strategy devised to place people at the centre and invest in them through five fundamental pillars –recognition of merit, diversity and inclusion, transformative workplace, leadership and guaranteed access to rights (workers and human)– with clearly defined goals and placed at the same level as the financial and environmental ones.

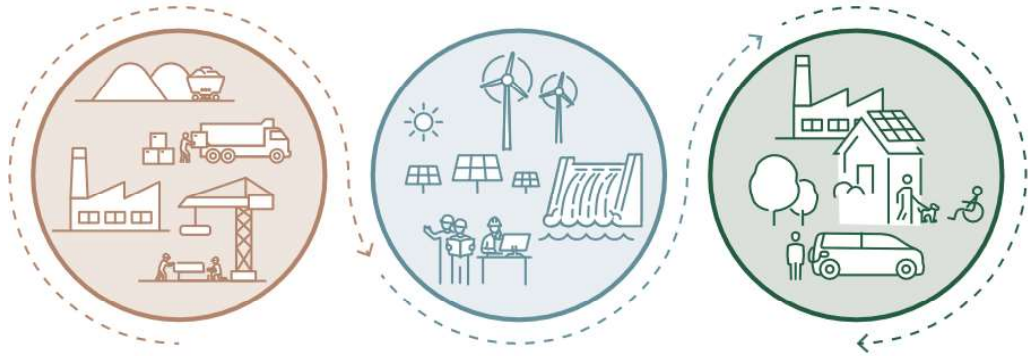
ACCIONA Energía examines how the strategy and business model can influence the creation, exacerbation or mitigation of impacts on employees, defining plans and actions to address them. This is set out in more detail in sections S1-4 and S1-5.

[S1-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

ACCIONA Energía has identified and assessed positive and negative impacts, risks and opportunities in relation to all its own workers (including those with specific characteristics or who work in particular contexts or perform particular activities that may be at greater risk of harm). In this regard, it has followed a systematic approach in line with the CSRD requirements, details of which can be found in Annex I of this report (where it can also be seen that some of the related issues are specific to certain groups).

A total of 13 issues have been identified, of which 12 have been considered relevant, related to the company's activities. The relevant impacts, risks and opportunities identified in the process are represented below.

Impacts, risks and opportunities identified



Sub-topic	Upstream Value Chain	Own Operations	Value Chain: Downstream
Working conditions	NI - Impact on occupational health and safety of workers		
	PI - Advanced occupational health and safety conditions		
Equal treatment and opportunities for all	PI - Promoting employment and quality working conditions		
	PI - Promoting equal rights and opportunities		

Caption:
NI - Negative impacts
PI - Positive impacts
R – Risks
O – Opportunities

Negative impacts

Generally applies to field workers, both own and value chain workers and fall into the following category:

- Impacts on workers' occupational health and safety: this includes the exposure of workers to occupational accidents and diseases mainly related to work at heights, electrical work, machinery entrapment, lifting of large components and road safety, with a particular impact on construction work.

Positive impacts

They fall into three categories:

- Advanced occupational health and safety conditions: the company implements advanced health and safety policies, and establishes work processes and material means aimed at ensuring the health and safety of its workers.
- Fostering quality employment and working conditions: this includes providing good working conditions in a promising sector, as well as promoting a Health and Well-being programme that enhances employee productivity, work-life balance, and attracting, promoting, and retaining talent.
- Promotion of equal rights and opportunities: this brings together the promotion of women's leadership and inclusion, and equity and equal opportunities among workers.

As part of the materiality exercise, no additional risks or opportunities related to ACCIONA Energía's own workers have been identified.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S1-1] POLICIES RELATING TO OWN WORKFORCE

ACCIONA Energía has a number of policies that address, among others, issues relating to its own personnel (including material issues). They apply to all its own workers, with the highest level responsible for their application being the company's senior management.

All ACCIONA Energía's policies are public and can be downloaded from its website in both Spanish and English.

These are summarised below in relation to own workers:

Code of Conduct

The Code of Conduct establishes the values that must guide the behaviour of all ACCIONA Energía companies. It serves as the basis for the company's Ethics and Compliance Model through which it seeks to detect and prevent risks, including criminal offences, and minimise their impacts. It includes policies, processes and controls to ensure compliance with internal and external rules.

The Business Principles and Ethical Conduct of the Model are:

- Basic Principles of Behaviour. This includes among other points:
 - The company takes the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and Conventions of the International Labour Organization, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact, among others, as basic guidelines for behaviour.
 - Comply with and abide by applicable national and international laws.
 - Respect human rights and public freedoms, contribute to the preservation of the natural environment and collaborate with the development and well-being of communities.
 - Promote honesty, fairness, truthfulness, compliance with commitments, free competition and transparency.
 - Provide good working conditions, respecting workers' rights.
- Principles of Ethics and Compliance. This includes among other points:
 - Know and comply with the rules: ACCIONA Energía employees must know and comply with the Code of Conduct and the internal and external rules related to their activity. In case of doubt, they can request information from their line manager, the Code of Conduct Committee, or the relevant bodies.
 - Assist in compliance: Employees must comply with the company's ethics and compliance requirements. This includes completing compliance statements and training requirements, and assisting in the implementation of processes and controls.

- Ensure the traceability of decisions: Employees must ensure the traceability of their decisions to demonstrate compliance with company policies, processes and controls.
- Clarify doubts and report any wrongdoing: Employees must immediately report any wrongdoing, non-compliance, or behaviour that occurs during the course of the organisation's activities and that contravenes the current legal framework, the Code of Conduct, and/or the Group's ethical values. They can contact the Ethics Channel Committee using the Ethics Channel.
- Demonstrate exemplary conduct: Employee conduct must protect ACCIONA Energía's reputation and be an example of rigour, ethics and professionalism.
- Be diligent also in dealing with third parties: ACCIONA Energía applies a homogeneous model to ensure ethics and compliance, based on the principle of due control. This includes assessing the ethics and compliance of third parties with which ACCIONA Energía maintains business relationships.

It also includes Behavioural Guidelines, including, among others:

- Respect for Legality and Ethical Values: Compliance with laws and ethical standards.
- Commitment to Human Rights: Respect for human rights and civil liberties.
- Respect for People: Prohibition of harassment in all its forms, compliance with the provisions of the International Labour Organization, especially in relation to minors, not allowing any form of child labour and promotion of a respectful working environment.
- Effective Equality: Promoting diversity and equal opportunities, basing the selection and promotion of employees on the competencies and performance of their duties, as well as on criteria of merit and ability and the principle of diversity. ACCIONA Energía encourages internal promotion and mobility as a means of retaining talent in the organisation. It seeks employee stability, development and motivation.
- All professionals must actively participate in the training plans that ACCIONA Energía makes available to them, engaging in their own development and undertaking to keep the necessary knowledge and skills up to date, in order to enable their professional progress and provide value to customers, ACCIONA Energía's shareholders and society at large. People in managerial or leadership positions must act as facilitators for the professional development of their staff.
- Cooperation and Dedication: Promotion of teamwork and efficient use of resources. The company's employees must work efficiently during the working day, making the most of the time and resources that the company makes available to them. ACCIONA Energía fosters a sense of belonging and pride among its employees. In order to achieve appropriate levels of communication in all senses of the word, ACCIONA Energía provides its employees with communication channels that encourage and nurture a sense of belonging.
- Health and Safety at Work: Adoption of safety policies and preventive measures. ACCIONA Energía promotes the adoption of occupational health and safety policies and takes the preventive measures established in the current legislation of each country. The company provides its employees and collaborating companies with the necessary guidance and resources to perform their activities in a safe and healthy manner. All ACCIONA Energía employees must be aware of and comply with occupational health and safety regulations and ensure their own

safety, that of other employees, customers, suppliers, collaborators and, in general, all persons who may be affected by the performance of their activities.

ACCIONA Energía has a Code of Conduct Committee that oversees the implementation and enforcement of the Code, handles communications reports, oversees the resolution of cases and ensures confidentiality and protection against retaliation.

Ethics Channel and Policy on how it works

The Ethics Channel is an internal reporting system for communicating breaches or risks of breaches of applicable legal regulations, the Code of Conduct or ACCIONA Energía Policies.

All ACCIONA Energía's own workers are obliged to immediately report any wrongdoing of which they become aware in the course of their professional duties.

The Code of Conduct Committee is responsible for managing the reports received through the Ethics Channel. Impartiality and objectivity in the handling of communications is ensured.

Possible ways of communicating through the Whistleblowing Channel: Through a web/intranet form, by post, voice mail, face-to-face meetings, videoconferences or telephone calls.

The whistleblower's identity is kept confidential at all times and would only be disclosed to judicial or administrative authorities if necessary.

It allows the submission of anonymous communications, with any action to discover the identity of an anonymous whistleblower being prohibited. It also prohibits retaliation against whistleblowers except in cases of false communications made with reckless disregard for the truth.

Whistleblowing communications are investigated internally within a maximum of three months, guaranteeing confidentiality.

The content of this policy is included among the training subjects linked to the employee training plan.

Failure to comply with this policy may result in disciplinary action.

Human Resources and Occupational Risk Prevention Policy

ACCIONA Energía's Human Resources and Occupational Risk Prevention Policy focuses on several key principles to ensure a safe, fair and respectful working environment.

Declaration of Intent

- **Ethics and Safety:** ACCIONA Energía values ethical behaviour and safety as distinctive components of its way of working.
- **Professional Development:** It is committed to the success and professional development of its employees, investing in the best talent.
- **Human Rights and Workers' Rights:** It respects human and workers' rights according to international standards.
- **Prevention of Occupational Risks:** It considers the prevention of occupational risks as a differentiating and essential component for the safety and health of employees and collaborators, having declared its support for the objectives of the Seoul Declaration on Safety and Health at Work.

Principles

- **High Ethical Standards:** It promotes values of respect, cooperation and teamwork, following the Code of Conduct.
- **Respect for People:** It prohibits forced labour in all its forms, child labour and lack of freedoms by adopting employment practices compatible with the conventions of the International Labour Organization. It also promotes equal opportunities and the recognition of professional merit.
- **Effective Equality:** It promotes the recruitment of the best professionals, ensuring real equality of opportunity and rejecting any kind of discrimination on grounds of age, race, colour, sex, religion, political opinion, national extraction, sexual orientation, social origin or disability.
- **Competitive Working Conditions:** It offers fair and equitable remuneration and competitive working conditions, with talent development and retention programmes.
- **Freedom of Negotiation and Association:** It respects the rights to freedom of association and collective bargaining in all countries where it operates.
- **Work-Life Balance:** It favours the work-life balance of its workers through flexible mechanisms.
- **Socially Responsible Recruitment:** It implements equality, diversity and inclusion plans, promoting the hiring of groups at risk of social exclusion and people with disabilities.
- **Value Creation:** It promotes local hiring to add value to the communities where it operates.
- **Ensure the best working conditions for employees:** From compliance with laws and regulations on wages and working hours, respecting all workers' rights as set out in applicable standards and agreements, and ensuring a healthy working environment.
- **Continuous Improvement of Occupational Health and Safety:** It disseminates its Prevention Management System to achieve the goal of zero accidents, providing the necessary training and resources.
- **Risk Identification and Analysis:** It conducts specific studies to avoid or reduce exposure to risks.
- **Delegation of Responsibilities:** It provides means and resources to guarantee health and safety, with the commitment of workers.
- **Dissemination of Good Practices:** It informs suppliers and collaborators in particular about the associated risks and preventive and emergency measures.
- **Promotion of Accreditation:** It promotes the accreditation of its activities according to the highest health and safety standards.
- **Health and Well-being Programme:** It implements specific policies to promote healthy behaviours in nutrition, physical exercise and preventive medicine.

This policy reflects ACCIONA Energía's commitment to creating a safe, equitable and respectful work environment, aligned with the highest ethical and human rights standards.

Diversity, Equity and Inclusion Policy

ACCIONA Energía's Diversity, Equity and Inclusion Policy focuses on promoting a diverse, equitable and inclusive work environment, recognising diversity as a competitive advantage and equity and inclusion as priority responsibilities.

Declaration of Intent

ACCIONA Energía understands and promotes diversity as a key competitive advantage and equity and inclusion as priority responsibilities in its people management model; which, in turn, are essential conditions for the defence of human rights, sustainable development and the achievement of the 2030 Agenda.

ACCIONA Energía aims to be the leading employer in the places where it operates, and to this end promotes a culture based on leadership, recognition, diversity and facilitating work environments for people. This policy develops the commitment to diversity which includes the company's commitments to the development of diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion through inclusion.

ACCIONA Energía understands Diversity to mean the set of characteristics, both visible and invisible, that make people unique and singular; Equity to mean that all people receive fair and impartial treatment and have access, support and resources so that they can flourish; and Inclusion to mean the strategy that values the individual characteristics of all people within the organisation and creates opportunities for all of them to participate, favouring a diverse and inclusive environment that fosters respect, safety, performance, well-being, belonging and commitment.

Principles

- **Respect for people:** It promotes an environment based on respect and dignified treatment, with no tolerance of harassment or discriminatory practices.
- **Non-discrimination:** It prohibits any discrimination on the basis of age, race, gender, sexual orientation, disability, religion or any other status.
- **Promoting diversity:** It fosters diverse teams and recognises the multicultural reality in all geographical areas where it operates.
- **Recognition based on effective equality:** It uses objective criteria for the recognition of professional skills and merits. Recognising and valuing gender diversity, the diversity provided by people with disabilities, the creation of job opportunities for people in vulnerable situations, generational diversity and the diversity provided by people of different backgrounds, race, ethnicity, colour, national extraction, sexual orientation, gender identity, marital status, family responsibilities, sensitive medical conditions, social origin, religion, political opinion, education, background, employment options, or any other condition that is a source of talent and richness.
- **Equal pay and consideration:** It ensures that selection, performance, compensation and benefits processes are based on objective and non-discriminatory criteria.
- **Inclusive leadership:** It promotes leadership models that foster an inclusive organisational culture.
- **Internal mobility:** It facilitates internal mobility and networking between teams.

- **Integration of professional and personal life:** It offers flexible mechanisms to promote well-being and equal opportunities, offering flexible mechanisms (maternity and paternity leave, work breaks, return to work programmes, working hours, remote work, dependent care, etc.) that promote equal opportunities, well-being and commitment in line with best practices in the places where it operates in its sectors of activity.
- **Inclusive workspaces:** It ensures accessibility and removes attitudinal barriers.
- **Inclusive communication:** It uses language that reflects the diverse reality of the people who form part of the company and is non-discriminatory in all communications.
- **Awareness raising and skills development:** It promotes diversity, equity and inclusion training and works with the local community to break down stereotypes.
- **Contribution to the creation of more inclusive environments:** It develops infrastructures that promote inclusion in communities.
- **Dissemination of principles:** It promotes the values of diversity, equity and inclusion among its stakeholders.

Monitoring and Control Mechanisms

- **Risk identification and assessment:** It conducts regular assessments to prevent and mitigate adverse impacts.
- **Communication and complaint mechanisms:** It has specific channels to collect and respond to rights violations.
- **Remediation:** It establishes mechanisms to remediate adverse impacts.
- **Monitoring and collaboration with authorities:** It monitors and corrects abuses, collaborating with the authorities when necessary.
- **Transparency and accountability:** It provides adequate and truthful information on the principles of the policy.
- **Monitoring and continuous improvement:** It regularly reviews its internal processes and sets representative diversity and inclusion targets.

This policy reflects ACCIONA Energía's commitment to creating a respectful, equitable and inclusive work environment, aligned with the Sustainable Development Goals and backed by specific actions that promote equal opportunities, value diversity and encourage everyone to reach their full potential.

Human Rights Policy

Expanded on more broadly in the previous chapter (ESRS2), the company's Human Rights Policy can be summarised as follows:

ACCIONA Energía's Human Rights Policy focuses on the protection and promotion of internationally recognised fundamental human rights.

General Commitments

ACCIONA Energía is committed to respecting and protecting human rights in all its activities and geographical areas, respecting and contributing to the effective application of the International Bill of Human Rights, i.e., the set of documents formed by the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its 8 core conventions; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the UN Convention on the Rights of the Child; the UN Global Compact; and the Seoul Declaration on Safety and Health at Work.

ACCIONA Energía is aligned with, and committed to complying with, the UN Guiding Principles on Business and Human Rights, assuming responsibility for respecting human rights, avoiding that its own activities cause or contribute to adverse consequences, addressing those consequences when they occur, and seeking to prevent or mitigate adverse human rights consequences directly related to operations, products or services provided by its business relationships, even when they have not contributed to generating them.

ACCIONA Energía takes into account national laws and regulations, and local practices in the countries in which it operates. In countries where national legislation or regulation may conflict with human rights compliance, the company is committed to establishing relevant risk control and mitigation mechanisms.

Key Principles

- **Fair and Dignified Treatment:** It guarantees respect for the human rights of all workers without any discrimination.
- **Free Work:** It prohibits forced labour, human trafficking and child labour.
- **Freedom of association, unionisation, collective bargaining and fair defence:** It defends freedom of association and the right to collective bargaining.
- **Safe Working Conditions:** It promotes safe and healthy work environments.
- **Fair Working Conditions:** It offers fair pay and equitable employment conditions.
- **Rights of the Person:** It respects rights such as privacy, property and equality before the law.
- **Privacy and Communication:** It protects confidentiality and the right to privacy.
- **Respect for Communities:** It respects the rights of local communities, including access to basic resources and participation in decisions that affect them.
- **Skills Development:** It promotes local skills development and human capital formation.
- **Sustainable Contribution:** It contributes to the economic, social and environmental progress of the communities where it operates.

Due Diligence

ACCIONA Energía undertakes to identify, assess, prevent, mitigate, stop, monitor, report, record, address, remediate and account for actual or potential adverse human rights impacts of its activities through a rigorous and truthful due diligence process, in accordance with the UN Guiding Principles on

Business and Human Rights and the Voluntary Principles on Security and Human Rights (this is detailed in the Pay chapter ESRS-2).

- **Risk Identification and Assessment:** ACCIONA Energía regularly identifies and assesses actual or potential human rights risks.
- **Integration of Results:** It integrates the results of these assessments into its internal processes.
- **Communication and Complaint Mechanisms:** It has specific channels to collect and respond to human rights violations.
- **Remediation:** Establishes mechanisms to remediate adverse human rights impacts.
- **Reporting and Monitoring:** It communicates actions taken and periodically reviews its processes for continuous improvement.
- **Promotion and training:** It promotes respect for human rights among its employees and other stakeholders, including specific training plans.
- **Supervision and collaboration with the authorities -** ACCIONA Energía has a Ethics Channel that allows both employees and any third party to report to the Ethics Channel Committee any wrongdoing, non-compliance or behaviour occurring as part of the organisation's activities that contravenes the legal framework in force, the Code of Conduct and/or the Group's ethical values, including any abuse committed to the detriment of human rights, and periodically informs the Board of Directors, through the Audit Committee, of the communications received and their resolution. If necessary, the Ethics Channel Committee refers the matter to the competent judicial authority, collaborating with the latter as required.

This policy reflects ACCIONA Energía's commitment to sustainability and social responsibility, ensuring that its operations are not only profitable, but also ethical and respectful of human rights.

Stakeholder Relations Policy

ACCIONA Energía's Stakeholder Relations Policy focuses on establishing and maintaining sustainable, long-term relationships with its stakeholders, based on transparency, continuous dialogue and the creation of shared value, including its employees among its main stakeholders.

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ACCIONA Energía seeks to generate shared value and long-term trust with its stakeholders, managing their needs and expectations to improve its sustainability practices and better manage risks and opportunities.

Principles

- **Value Creation:** ACCIONA Energía is committed to providing value to stakeholders in the geographical areas where it operates, developing business models that contribute to sustainable development and mitigating economic, social and environmental risks.
- **Integration of Needs and Expectations:** It maintains regular and free-flowing dialogue with its stakeholders, finding out and responding to their needs and expectations, and incorporating the most relevant ones into its business strategy.

- **Dissemination of the Sustainability Strategy:** It is committed to communicating its sustainability culture to employees, customers, suppliers, partners and other stakeholders, ensuring that sustainability is present in all business areas and organisational levels.
- **Channels of Communication and Dialogue:** It provides suitable and accessible channels for collecting suggestions, needs, expectations, views and complaints, as well as transparent, truthful and rigorous information on the fulfilment of the commitments undertaken and the results of its business management.
- **Responsibilities and Resources:** It establishes responsibilities and dedicates the necessary resources to meet the needs and expectations of stakeholders.
- **Monitoring and Continuous Improvement:** It implements mechanisms to periodically evaluate stakeholder satisfaction and incorporate the necessary improvements to increase it.

[S1-2] PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

ACCIONA Energía recognises the importance of the participation of its staff and their representatives in the identification and management of impacts that may affect them and which serve as a basis for its management decisions. In line with the principles of its policies, the company has different processes of continuous and systematic collaboration through which to inform, consult and/or participate in relation to its impacts.

As a general rule, the handling of labour-related impacts is structured in three levels of management:

1. **Corporate Level:** Relations are established and maintained with the main international trade unions linked to the company's activities, such as BWI and UNITE. This level is responsible for global and strategic interactions with these bodies.
2. **National and Industry Level:** In the different countries where ACCIONA Energía operates, and with corporate support, relations with national trade unions are managed. This implies participating actively in industry and national negotiations, adjusting to the particularities and requirements of each region.
3. **Project level:** At this level, collective bargaining and the relationship with local trade unions, as well as the legal representation of workers in the workplace, are managed directly through the Employee Relations and HR teams in each country and project. In situations requiring special attention or in cases of potential conflict, these groups are supported and advised by the corporate teams.

At ACCIONA Energía, collective bargaining is carried out by teams specialising in Employee Relations, Human Resources and Business Management. This process covers several key aspects to ensure effective risk management:

1. **Assessment of industry perspectives and workers' expectations:** It analyses both the proposals put forward by workers' representatives and the implications of legislative proposals, with the aim of aligning expectations and industry realities.
2. **Economic and social analysis:** A thorough assessment is made of the Company's economic and social situation, the industry in which it operates and company-specific projects. This includes assessing the economic impact of labour platforms.
3. **Organisational impact of proposed changes:** It examines how the proposed changes may affect the company's organisation and resources, analysing the potential impact on productivity and business management.

4. **Analysis of the risk of employment disputes:** The risk of employment disputes and their potential economic and reputational impact is assessed in order to prevent and mitigate these situations.
5. **Development of business proposals for negotiations:** Proposals are prepared for negotiations, both internally in ACCIONA Energía and through national business organisations in legislative change processes.

ACCIONA Energía holds ongoing and regular meetings with all trade union and employee associations to prevent any issues that could lead to conflict, thereby minimising the impact of such scenarios.

Each country and business has formally established channels to file grievances and complaints, as well as communication channels with employees and HR managers in each business unit and workers' legal representatives without prejudice to the direct communication every worker can initiate with their corresponding management and human resources contacts.

The company will enter into agreements with employee representatives internationally to cover all company activities including countries where there is no established representation structure.

In the particular case of impacts related to occupational risks, employees also have access to the company's occupational risk prevention officers, as well as to the specialised legal structures of the workers' representatives.

Similarly, in the case of impacts related to the violation of the company's Code of Conduct (the company's global framework for human and worker rights, which all ACCIONA Energía managers and employees undertake to abide by), employees also have the option of collaborating through communication channels with those responsible from the Compliance Division.

In any case, ACCIONA Energía has an Internal Control System for Social Safeguards (ICSSS) to promote and consolidate a true culture of compliance with and respect for current legislation and relevant international rules and principles on human rights.

Regarding the perspectives of its own staff members who are particularly vulnerable to impacts (for example, women, migrants and people with disabilities), ACCIONA Energía has specifically dedicated resources within the Human Resources Department that enable this collaboration, such as Diversity and Inclusion Management and the Disability Office.

With regard to the potential impacts derived from the reduction of carbon emissions and the transition towards greener and more climate-neutral operations, the company's commitment to activities that contribute to the mitigation and adaptation of climate change is evident, and in any case there are open channels of communication with the Sustainability Department.

The way in which decisions on impacts are communicated to staff members varies according to the nature of the impact. As a general rule there is a formal communication via e-mail to the employees affected by the decisions.

The effectiveness of the company's collaboration and dialogue with employees is evaluated through various mechanisms, such as the annual employee satisfaction survey through the Engagement & Sustainability Global Barometer.

The highest level function within the company, operationally responsible for ensuring impact collaboration, ultimately rests with the company's Steering Committee.

[S1-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

ACCIONA Energía has several processes and channels in place to provide remediation or cooperate in the remediation of negative impacts affecting its own workers.

ACCIONA Energía follows an approach based on respect for human rights and business ethics. The company is committed to providing remediation where it has caused or exacerbated a significant adverse impact on its workers. This commitment is reflected in its Code of Conduct and Human Rights Policy. The processes include the identification and assessment of impacts, the implementation of preventive measures and the creation of mechanisms to remediate impacts already caused.

ACCIONA Energía has several specific channels for its workers to express their concerns or needs through which it handles grievances and complaints in a fair and transparent manner.

In relation to general labour issues, particular communication channels (mailboxes, telephone, direct contact) can be established with line managers as well as with assigned human resources managers. Similarly, employees can voice grievances through works councils and trade unions.

In relation to occupational risk related impacts, the communication channels are defined by the procedures of the occupational risk prevention management system, certified according to ISO 45001 and applicable in the company, in which the reference profiles for making these communications are identified for each case.

In relation to matters of non-compliance with workers' rights and/or human rights, the employee has access to the Ethics Channel, whose functioning mechanism has already been explained in section S1-2.

The company promotes the availability of these channels in the workplace through training and continuous communication (mailing campaigns and through the website) on employees' rights and responsibilities. In addition, it ensures that these channels are accessible and known to all staff. ACCIONA Energía monitors and controls the issues raised through these channels. The company assesses the effectiveness of channels through stakeholder engagement and ensures that concerns are adequately addressed.

ACCIONA Energía regularly assesses whether its staff members are aware of and trust these processes and structures. The company conducts surveys and consultations to measure effectiveness and trust in these mechanisms, such as the annual employee satisfaction survey through the Engagement & Sustainability Global Barometer.

The company has clear policies in place to protect individuals using these channels from retaliation, including workers' representatives. These policies ensure that employees can raise their concerns without fear of retaliation.

[S1-4] TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

As part of the PEOPLE strategy, based on the development of its 4 pillars:

- A. Merit and Recognition
- B. Diversity and inclusion
- C. Transformative work environment
- D. Leadership and access to rights

ACCIONA Energía carries out a wide range of actions in order to take action and manage the various issues relating to its own employees, including those identified as material:

A. MERIT AND RECOGNITION.

ACCIONA Energía highlights the importance of recognition in its PEOPLE strategy, focusing on linking employee growth and contributions to business goals and rewarding proactivity. Talent management based on goals, values and behaviours is used to identify and recognise those who advance targets and add value.

The performance assessment process is crucial for operational efficiency and professional development, focusing on individual and collective goals, and fostering continuous dialogue between managers and teams. Annual appraisals, uniform throughout the organisation, measure performance and potential, promoting meritocracy and professional development. This model includes recurring dialogues on well-being, aspirations, goals, development plans and international mobility.

Talent development and promotion

At ACCIONA Energía, it is essential to have the key talent ready and committed to respond to the needs of the business. To this end, development programmes are designed and implemented to promote the learning and career advancement of professionals in the company (investment in training available in the entity-specific section of this chapter). These programmes are geographically global and transversal in all categories and roles in the organisation and are carried out in collaboration with internationally renowned colleges and business schools.

The programmes implemented over the course of 2024 were:

- **Technician II Programme:** this programme works on the key skills expected at the first levels of the organisational structure. It is taught in collaboration with the ESADE business school. It begins with a competency test that allows participants to find out their level of development in the key skills expected for their role, which they will then worked on following a personalised itinerary for six competencies defined. In 2024, the 4th Edition of the programme was launched, in which a total of 20 professionals from 5 different countries participated: Australia, Spain, the

United States, India and Mexico. 100% of the technicians identified as having the highest performance and potential have been invited to this programme.

- **Career Acceleration Programme:** this programme aims to boost the professional development and career of those women in the role of Technician III (level 4) who have consistently shown outstanding performance and potential over time. The programme begins with a competency test that allows participants to assess their level of development in the key skills expected for their current and future role, which will then be put into practice in work sessions, individual interviews, an action plan and a voluntary mentoring process. In 2024, the 5th Edition of the programme was launched, in which a total of 11 professionals participated, representing almost the entire group with the highest scores in performance and potential, with representation from 5 different countries: Australia, Chile, Spain, and Mexico.
- **New Managers Programme:** managers make up the middle management layer of the organisation and play a key role in translating the company's strategy and vision into tangible actions on a day-to-day basis. The New Managers programme aims to work on the key skills expected from them in this role. This initiative is designed and implemented in collaboration with Headspring, a joint venture between the Financial Times and IE Business School. The contents are developed in nine working sessions and consolidated with an action plan and a voluntary mentoring process. In 2024, the 7th Edition of the programme was launched with the participation of 41 Managers from 10 different countries: Australia, Chile, Spain, United States, France, India, Mexico, Singapore, South Africa and Portugal. 100% of the managers promoted this year were invited to the programme.

At ACCIONA Energía we have designed and implemented development programmes geared to our business that promote the professional growth of our teams in line with the company's strategic interests. These programmes have a global focus, covering all the territories in which we operate:

- **O&M Academy Program:**

Following the IPO in 2021, ACCIONA Energía agreed to achieve a series of milestones in its strategic plan, which require the collective effort of the entire business. To accelerate the achievement of these results, the Operation & Maintenance team, together with the support of the Talent area, is developing a global O&M Academy .

This Academy seeks to accelerate the achievement of the objectives and results of the Operation & Maintenance area, in a context of business growth and internal reorganisation towards a matrix structure, by disseminating best practices and company culture transversally and internationally to all teams.

The 2nd edition of this initiative was launched in 2024. For this, 50 employees have been selected and divided into 5 task forces, each with a business challenge and an assigned tutor, who will guide and advise them throughout this experience.

The content of this programme is structured around three main pillars:

1. Competence sessions for tutors. From the Talent function a competency-based plan has been designed for the figure of the tutors with the aim of accompanying them in their new challenge of: (a) managing high-performing international teams, without hierarchical

superiority over them; (b) guiding them and accelerating results in a context of business growth; (c) managing transversal projects (matrix structure of the organisation).

2. A solid theoretical basis: from the Talent function, competency-based sessions have been designed for the 50 participants, specialised in two key skills in their role within the Programme, which will help them to face the new challenges:
 - The power of influence
 - Productivity
 3. Tutorials. Monthly meetings of each group with their assigned tutor, in which they will be able to apply the theoretical knowledge learned, with the guidance and orientation of the tutors.
- In 2024 we marked the completion of the first edition of the **Youth Committee**, an intergenerational development initiative in which 12 high-potential young people represented the members of ACCIONA Energía's Global Committee.

This innovative initiative, designed with a 50:50 approach, seeks to give visibility to the Young Talent group, providing the business with a fresh, innovative perspective aligned with the trends and preferences of the new generations. The main objective is to enrich strategic decision-making through diversity of thought and the integration of different visions.

The Youth Committee strengthens the link between current leaders and young talent, our "future leaders", promoting an inclusive, responsive and essential environment to ensure the long-term sustainability and growth of our organisation in a dynamic and evolving industry.

In June 2024, the members of the Youth Committee met face-to-face for two days at the headquarters in Madrid. During these days, they participated in learning sessions focused on communication skills, leadership and influence, as well as team building activities. They also had the opportunity to present their proposals and initiatives directly to the CEO of ACCIONA Energía, representing the interests and ideas of young talent. These proposals are intended to be implemented in collaboration with the executive committee, making a significant impact on the company's strategy.

- ACCIONA Energía's **Role Swap** Programme offers high-potential employees from the same department, but located in different countries, the opportunity to exchange positions on a temporary basis for three months. This initiative fosters an enriching and unique international professional development experience.

The programme not only broadens global perspectives and multicultural diversity, but also advances the professional growth of participants and facilitates the exchange of synergies and best practices between teams.

This results in tangible benefits both in terms of retaining and developing internal talent and in improving ACCIONA Energía's operational efficiency.

A total of 16 employees from countries such as Australia, Spain, the United States, France, India, Mexico and Chile participated in 2024.

With this programme, we promote the internal mobility of employees in technical and specialist roles to different countries, helping them to acquire new competencies and skills, while strengthening global networking and cohesion between our international units.

- **"Tech Hub New Generation"** is an ACCIONA Energía initiative designed to promote professional development in the renewable energy sector among university students in the Tamaulipas region of Mexico. This programme offers free specialised training and the possibility of gaining work experience both nationally and internationally in energy projects.

Talent Attraction Phase (2023)

In its initial phase, developed in 2023, the programme established strategic alliances with leading universities in the region, such as the Universidad Tecnológica de Tamaulipas del Norte (UTTN), the Tecnológico Nacional de México (TECNM) and the Universidad Autónoma de Tamaulipas (UAT). During this first call, 40 university students were selected to participate in an intensive two-week programme. This included:

- Technical training: Courses focused on wind energy.
- Interaction with experts: Conferences given by sector professionals.
- Technical visits: Tours of wind farms in the region.

Training and Mobility Phase (2024)

After a rigorous evaluation process, 12 students - six men and six women - were selected to advance to the next stage of the programme as Maintenance Assistants. During this phase, participants received comprehensive training that combined technical aspects with the development of professional skills and competences.

In the last quarter of 2024, five of these young people were assigned to ACCIONA Energía projects in the United States, where they put their acquired knowledge into practice. Their contribution has been key to increasing the availability of energy projects in that country, establishing themselves as valuable members of the international team.

- **Turn the Ship Around** is an initiative driven by the local Human Resources team in the United States, with the aim of translating the concepts of David Marquet's book "Turn the Ship Around" into concrete actions to improve performance and work culture on a day-to-day basis.

The book, which recounts David Marquet's experience as captain of the submarine USS Santa Fe, adopts an approach that encourages individual responsibility, proactivity and decentralised decision-making, leading to more committed and efficient teams.

The purpose of this initiative has been to adopt these principles so that the organisation evolves towards a leader-leader structure rather than the traditional leader-follower one. This seeks to foster proactivity, empower teams in decision-making and strengthen an organisational culture where each person feels they have a significant impact on results.

In the last quarter of 2024, this initiative was launched and includes the participation of the entire ACCIONA Energía organisation in the United States, involving more than 200 people.

1. Task Forces and Chiefs:

- Various task forces were set up to address the concepts in the book and apply them in practical situations.
- Each task force has a Chief, chosen to lead and organise the sessions, ensuring that participants are actively involved.

2. Pilot in the Operation and Maintenance (O&M) Area

- In the O&M area, due to its operational and field nature, a pilot was implemented in a specific park.
- This pilot will make it possible to assess the feasibility of extending the model to the rest of the equipment in wind farms, creating a scalable methodology.

Turn the Ship Around's collaborative approach seeks to gather input from each task force to develop a mission statement that reflects shared values and objectives, reinforcing a sense of belonging and aligning the whole organisation towards a common purpose.

This initiative not only symbolises an evolution in the leadership structure, but also a commitment to continuous improvement, empowered team building and cultural transformation at ACCIONA Energía in the United States, having a tangible impact on productivity, innovation and employee well-being.

- **Australian Leadership Program.** The local HR team in Australia has developed a leadership programme that gives managers the confidence to empower their teams to drive business results. Managers will obtain a greater aptitude for leadership, deeper internal and external relationships and a strategic skill set to become leaders in ACCIONA Energía. This project not only has an impact on the professional development of managers, but also impacts the organisation and the business.

Through this integrated, multi-layered programme, ACCIONA Energía supports the development of both individual leaders and the organisation's leadership capacity and culture. This approach maximises the impact of the programme on individual leaders and develops a sustainable leadership culture.

- New Leader Programme (1 session per week, for a total of five weeks). The audience consists of new managers who have just taken up their position, as well as managers who are already established but need to learn the basics of leadership. In this first “layer” / “level” of the programme, we seek to equip these leaders with basic leadership skills:
 - Confidence of the leader
 - Applying leadership practices in the team
 - Positive team performance.
- Senior Leader Programme (17 participants. 1 session per month, for a total of 6 months). The audience is experienced managers, leaders of leaders and leaders with

responsibility for the execution of ACCIONA Energía Australia's organisational strategy. In this second layer or level, we aim to improve the leader's ability to lead different functions and teams and to maximise the impact on people and performance.

— Self and system awareness

— People performance

— Executing the strategy

- Executive Leader Programme (11 participants, 8 sessions per year). The audience is the executive leaders responsible for leading the organisation (strategy, culture, change and innovation) into the future. In this final layer of the programme, we seek to empower executive leaders to meet the needs of business leadership and adaptive organisational transformation.

— Strategic thinking and influence

— Organisational culture development

— Teamwork at executive level

- **Individual Development Plans (IDPs):** ACCIONA Energía not only promotes the collective development of employees globally, but also encourages personal and professional growth through Individual Development Plans (IDPs). These initiatives allow the design of personalised strategies to guide each employee in their professional development, tailored to their specific needs and objectives.

In 2024, ACCIONA Energía implemented five IDPs focused on facilitating strategic position changes that have had a positive impact on the business. These initiatives have a global and cross-cutting focus, integrating participants from Chile, Spain and Mexico, and encompassing both the Energy and Energy Services business lines.

- **Executive Coaching:** Following the 360 assessment carried out in 2023 on all ACCIONA Group executives, it was decided to continue this exercise through a voluntary coaching process, aimed at strengthening the areas for improvement identified in the assessment.

At ACCIONA Energía, 50% of the executives who took part in the 360 voluntarily opted to join this individual coaching process. Five specialised providers have been involved in the delivery of these sessions, ensuring a diverse approach tailored to the needs of each participant.

Wage remuneration

The company rewards its employees in all the countries in which it operates according to sectoral and geographical competitiveness, internal equity and merit criteria. Also, based on the current laws, the employees' remuneration is subject to the applicable collective bargaining agreements.

The strategy of keeping a competitive remuneration system is laid out in the remuneration policy, which aims to establish a suitable remuneration method appropriate to the people's engagement and responsibilities.

Wage remuneration. Fixed remuneration plan

In the annual pay review process, employees whose basic salary is above that established in the salary tables of the different collective bargaining agreements participate.

During 2024, an objective process was implemented globally to make a systematic salary increase recommendation based on a merit matrix, involving 2,560 employees. This matrix takes into account factors that seek to achieve an improvement in the company's internal equity and recognise key positions and profiles with high development or potential: market positioning, employee performance level and potential and approved budget.

Wage remuneration. ACCIONA Variable Remuneration Plan - ACCIONA Bonus

The annual programme for employees with variable remuneration is based on objective and pre-established metrics which, in 2024, were applied to a total of 2,392 employees. The programme has been in place since 2012 and depends on the financial results of the company, of each division and business, sustainability performance and employees' individual targets. In addition, non-compliance or violation of the rules established in the Code of Conduct, or other company policies or rules of conduct that have influenced the assessment of results may be reflected in the employee's variable remuneration, through a clawback clause.

The ACCIONA Bonus is implemented internationally across all companies and in all major countries.

Sustainability-related criteria

Sustainability goals make up 12.5% of variable remuneration with this percentage associated, among other things, with achieving goals in terms of GHG emissions generation (through the ESG budget), presence in sustainability ratings, accident frequency rate for own and contracted workers and gender equality in management and pre-management positions.

A. DIVERSITY AND INCLUSION

ACCIONA Energía recognises that diversity is a source of talent that brings competitive advantages, and inclusion is an essential pillar of people management. Fostering an inclusive environment that ensures equal treatment and opportunities is not only an ethical commitment, but also a key part of turning the diversity that the company's people bring into tangible results.

This comprehensive approach allows us to integrate diverse perspectives to generate innovative ideas, make more informed and fairer decisions, attract and retain talent, strengthen our reputation for inclusion, access diverse markets and promote a positive work climate, thus contributing to the success and sustainability of the organisation.

ACCIONA Energía promotes diversity and inclusion through a comprehensive strategy managed by the Organisation, Talent and Health Division. This strategy is implemented through the Sustainability Master Plan 2025 and the PEOPLE strategy.

The company focuses on creating inclusive work environments, raising awareness and training of its staff and diversifying talent. It also measures the impact of its actions using digital tools and tracking systems that provide real-time information that enables decision-making to promote diversity and inclusion in its teams and work environments.

ACCIONA Energía closed 2024 with staff averaging 3,224 employees, of which 26% are women. All in all, a total of 51 nationalities with presence in 24 countries across 5 continents.

As part of this strategy, ACCIONA Energía has deployed the following lines of work:

Development of skills in diversity, equity and inclusion

In order to foster a more inclusive culture and work environment, ACCIONA provides courses on equality, diversity, inclusion, bias, non-discrimination and multiculturalism (investment in training available in the entity-specific section of this chapter). These courses are offered through a variety of modules designed to address these crucial issues. A total of 3,856 hours were taught on these areas in 2024.

Internal Networks for Diversity and Inclusion

ACCIONA ENERGÍA uses internal Diversity and Inclusion networks, led by employees, to foster an inclusive work environment aligned with the company's values.

The company's internal networks are as follows:

- 1 Diversity and Inclusion Committee: internal network of employees who advance best practices, connect people and adapt the global Diversity and Inclusion strategy to local needs. They represent diverse groups, promote inclusive initiatives and strengthen the sense of community and belonging within the organisation, aligning themselves with the company's values and objectives.
- WIRE (Women In Renewable Energy), which is focused on building a supportive community that promotes gender equality and inclusion in the field of renewable energy.

External networks



- In 2024, ACCIONA joined REDI, the Business Network Association for LGBTI Diversity and Inclusion (REDI), the first ecosystem of companies and professionals in Spain working to promote safe and respectful work environments for all people, regardless of their identity, gender expression or sexual orientation.
- ACCIONA is a member of RIEI, the Ibero-American network of Inclusive Companies that promotes the social and occupational inclusion of people with disabilities.
- ACCIONA is part of the ONCE Foundation's INSERTA programme, which promotes actions in the area of accessibility to goods and services, as well as including actions focused on workplace inclusion.

Inclusion of communities and people at risk of social exclusion.

ACCIONA Energía strives to generate positive impacts in the communities in which it operates, promoting local talent and contributing to improving the quality of life of their inhabitants. In this context, the company participates in several programmes designed to promote the inclusion of people from local communities, as well as under-represented groups and people in vulnerable situations.

Some of the initiatives highlighted have been:

- **Workplace inclusion of people at risk of vulnerability:**
 - Collaboration with the Integra Foundation for the workplace inclusion of people with disabilities, the long-term unemployed and victims of gender-based violence.
 - ACCIONA has been collaborating with the initiative that brings companies together for a society without gender-based violence (*Empresas por una Sociedad libre de Violencia de Género*) since it began in 2012. ACCIONA Energía, as a group company, is committed to encouraging the integration of women who have suffered gender-based violence and, for this reason, supports the work done by foundations like Integra and Red Cross.
 - **Inclusion of ethnic communities:** ACCIONA Energía encourages local hiring and protects minorities (B-BBEE requirements in South Africa, First Nations in Canada, indigenous people in Australia, migrant groups in the Middle East and Asia, and other communities), developing specific plans that include training and raising awareness. In 2024, a total of 18 ethnic groups formed part of the company's workforce.
- **Access and professional integration of local communities: "Tech Hub New Generation"** is an ACCIONA Energía initiative designed to foster professional development in the renewable energy sector among university students in the Tamaulipas region of Mexico. This programme offers free specialised training and the possibility of gaining work experience both nationally and internationally in energy projects. This initiative has been implemented in several phases:

Talent Attraction Phase (2023)

In its initial phase, developed in 2023, the programme established strategic alliances with leading universities in the region, such as the Universidad Tecnológica de Tamaulipas del Norte (UTTN), the Tecnológico Nacional de México (TECNM) and the Universidad Autónoma de

Tamaulipas (UAT). During this first call, 40 university students were selected to participate in an intensive two-week programme. This included:

- Technical training: Courses focused on wind energy.
- Interaction with experts: Conferences given by sector professionals.
- Technical visits: Tours of wind farms in the region.

Training and Mobility Phase (2024)

After a rigorous evaluation process, 12 students - six men and six women - were selected to advance to the next stage of the programme as Maintenance Assistants. During this phase, participants received comprehensive training that combined technical aspects with the development of professional skills and competences.

In the last quarter of 2024, five of these young people were assigned to ACCIONA Energía projects in the United States, where they put their acquired knowledge into practice. Their contribution has been key to increasing the availability of energy projects in that country, establishing themselves as valuable members of the international team.

- **Intergenerational diversity: Youth Council:** In 2024 we marked the completion of the first edition of the Youth Committee, an intergenerational development initiative in which 12 high-potential young people represented the members of ACCIONA Energía's Global Committee.

This innovative initiative, designed with a 50:50 approach, seeks to give visibility to the Young Talent group, providing the business with a fresh, innovative perspective aligned with the trends and preferences of the new generations. The main objective is to enrich strategic decision-making through diversity of thought and the integration of different visions.

The Youth Committee strengthens the link between current leaders and young talent, our "future leaders", promoting an inclusive, responsive and essential environment to ensure the long-term sustainability and growth of our organisation in a dynamic and evolving industry.

In June 2024, the committee members met face-to-face for two days at the headquarters in Madrid. During these days, they participated in learning sessions focused on communication skills, leadership and influence, as well as team building activities. They also had the opportunity to present their proposals and initiatives directly to the CEO of ACCIONA Energía, representing the interests and ideas of young talent. These proposals are intended to be implemented in collaboration with the executive committee, making a significant impact on the company's strategy.

Gender equality

ACCIONA Energía recognises that gender equality and equal pay are essential to create fair and inclusive work environments. The company focuses on identifying and managing the impacts and risks associated with gender equality, ensuring that all employees have equal opportunities for career development and that there is equitable compensation.

To achieve these objectives, ACCIONA Energía implements several strategies:

- **Equal opportunities:** Identification of gaps in skills and competencies to ensure equal career opportunities.
- **Pay gap analysis:** Continuous assessment of equitable compensation between men and women.
- **Training:** Training programmes on unconscious bias and non-discrimination, available in several languages.
- **Reporting systems:** Mechanisms to identify and quantify risks, measure the impact of diversity initiatives and link diversity objectives to variable pay.
- **Promoting equal representation in leadership roles:** Implementation of special female leadership programmes in order to promote the attraction, retention and promotion of talent in the different stages of women's professional careers.

ACCIONA is also a signatory of the Women's Empowerment Principles of the UN Global Compact, promoting gender equality through seven action principles in the labour, social, educational and health and well-being fields. As a member of the Global Compact, ACCIONA joined the Target Gender Equality project in 2020, accelerating its contribution towards Sustainable Development Goal (SDG) 5, which aims to achieve gender equality.

ACCIONA Energía develops specific programmes to **promote female leadership**, the key objectives of which are: to support professional development through tools that favour career growth, create an affinity group to share experiences and learning, and give visibility to female talent, forming a pool to promote gender diversity at all levels of the organisation and accelerate cultural change in an industry where women are traditionally under-represented.

The programmes are as follows:

- **Global programme to fast-track women with potential:** This programme accelerates the careers of women in high-potential technical roles through key skills sessions, practical actions and voluntary mentoring. The fourth edition ended in 2024 with 10 ACCIONA Energía participants from 6 different countries: Australia, Spain, Mexico, Portugal, Singapore and South Africa.
- **IWAT (International Women Acceleration Track):** This global programme, co-designed with Manchester University and Nebrija University, aims to boost the careers of junior female managers. The second edition which ended in 2024 had 6 participants from ACCIONA Energía from 4 different countries: Australia, Croatia, Spain and Poland.
- **Global mentoring programme for pre-executive women:** Aimed at women in senior management positions, it runs every other year. The third edition in 2024 has 11 participants from ACCIONA Energía, from 6 countries: Brazil, Spain, the United States, Mexico, Poland, and South Africa.
- **Women's Leadership Programme with BISÉ:** Women's development programme designed by the consulting firm BISÉ and aimed at pre-management women with the objective of supporting the development of women to positions of responsibility to generate stronger and more diverse future talent. A pre-management female member of staff was involved in 2024.

- **“Aprendízate” programme.** Created in Spain to develop skills and competencies, it is aimed at women and in 2024, 473 women from ACCIONA Energía were invited and 148 female employees enrolled in one or more of the courses offered.
- **Sostenibl@s 50:50:** seeks to increase female representation and leadership, especially in STEM activities in the company's projects and production centres, which have traditionally been carried out mostly by men in the field of Energy. The main objectives of this programme are to attract and develop local female talent in the sectors in which the company operates, to generate a positive impact on communities by improving the employability of women in key areas of the economy and to create replicable models that help to break down stereotypes about the presence of women in certain activities. Since its launch, a total of four projects with 50:50 gender representation have been implemented:
- **TECH HUB New Generation (50-50):** is an ACCIONA Energía initiative designed to foster professional development in the renewable energy sector among university students in the region of Tamaulipas, Mexico. This programme offers free specialised training and the possibility of gaining work experience both nationally and internationally in energy projects.

Talent Attraction Phase (2023)

In its initial phase, developed in 2023, the programme established strategic alliances with leading universities in the region, such as the Universidad Tecnológica de Tamaulipas del Norte (UTTN), the Tecnológico Nacional de México (TECNM) and the Universidad Autónoma de Tamaulipas (UAT). During this first call, 40 university students were selected to participate in an intensive two-week programme. This included:

- Technical training: Courses focused on wind energy.
- Interaction with experts: Conferences given by sector professionals.
- Technical visits: Tours of wind farms in the region.

Training and Mobility Phase (2024)

After a rigorous evaluation process, 12 students - six men and six women - were selected to advance to the next stage of the programme as Maintenance Assistants. During this phase, participants received comprehensive training that combined technical aspects with the development of professional skills and competences.

In the last quarter of 2024, five of these young people were assigned to ACCIONA Energía projects in the United States, where they put their acquired knowledge into practice. Their contribution has been key to increasing the availability of energy projects in that country, establishing themselves as valuable members of the international team.

- **Agora Energía Spain Project.** Programme for the inclusion of women in the area of Operation and Maintenance of assets, in identified positions in which women trained in these disciplines in local vocational training schools are hired for the first time and for which adaptations have had to be made to equipment and tools. Female production engineers lead the programme and are the mentors who accompany the students during their internships and their subsequent insertion in the workforce. The employees themselves have come up with innovative solutions to adapt the working tools. In 2024, 3 women were hired for park technician positions.

- **Chile Energy Project.** Working with local universities, a pool of female talent continues to be promoted to work as local maintenance operators at the different power plants and farms being operated in Chile. In 2024, 20% of all O&M technicians were women.

Employment and inclusion of people with disabilities

ACCIONA Energía's strategy towards the inclusion of people with disabilities focuses on integrating disability management in the workplace, marking a long-term commitment since 2000. The company carries out work environment assessments, establishes targets and monitoring systems, and promotes awareness and training to foster an inclusive culture. It also implements reasonable accommodation and policies for the recruitment, retention and promotion of people with disabilities, collaborating with specialised organisations.

ACCIONA Energía seeks to integrate accessibility and inclusion throughout the employee experience, using technology as a key tool. The company promotes the active participation of people with disabilities in all areas and at all levels, focusing on creating job opportunities and ensuring that inclusion is an integral part of its corporate culture.

The company is committed to creating inclusive and barrier-free environments, facilitating the equal participation of people with disabilities. To this end, ACCIONA Energía:

- Analyses and identifies barriers in working environments.
- Develops training and awareness-raising programmes.
- Establishes targets and monitoring systems with indicators.
- Evaluates roles and jobs to determine necessary accommodation.
- Implements inclusive recruitment practices.
- Makes reasonable accommodation in the workplace.
- Clearly communicates its inclusion policies and objectives.

In 2024, the ACCIONA Group created the Disability Office, a point of comprehensive advice and individual monitoring that provides service to the company's people in relation to disability, with the aim of increasing the full participation of people with disabilities at all levels and in all areas of the company's work, promoting their professional development and well-being. The company has also improved the accessibility of its vacancies and implemented innovative solutions to benefit all its employees.

Other noteworthy initiatives in 2024 were:

- **Accessibility and Inclusion Programmes**
 - Smart Accessibility: Development of devices for the visually impaired at the ACCIONA MESENA CAMPUS in Madrid.
 - Digital Onboarding: Use of virtual and augmented reality to facilitate the integration of people with intellectual disabilities.

- **Workplace Inclusion Programmes**

- The Value of Disability: Comprehensive support to obtain a disability certificate.
- People: Training and mentoring for young people with disabilities who have recently graduated from ACCIONA Energía Mexico. A new edition was launched in 2024.
- +Diverse+Able: Identification of new job opportunities for people with intellectual disabilities. In 2024, ACCIONA Energía Spain hired 4 employees with disabilities; in Australia, 1 employee and in Croatia, another employee.

C. TRANSFORMATIVE WORK ENVIRONMENT.

Regarding the Transformative Environments pillar of the PEOPLE strategy, the focus is on improving the employee environment and brand image with a positive impact on the society in which the company operates.

Brand as employer. Talent attraction and internal mobility.

ACCIONA Energía creates innovative and competitive strategies that position ACCIONA in the market as an leading employer and offer a unique experience to its candidates, focusing on sustainable employability, early identification of talent, investment in employee development and providing mobility opportunities.

During 2024, training programmes aimed at sharing knowledge, reinforcing best practices and generating synergies among the global recruiting community were continued through different modules that reviewed the strategic pillars of the Recruitment function.

As part of the strategy that positions ACCIONA Energía as an employer brand, an exercise has been carried out to identify areas for improvement in its current recruitment model:

- Lack of alignment: Recruitment processes, external and internal, vary significantly between countries and lack a homogeneous structure.
- Insufficient feedback: Candidates (internal and external) receive little or no information during the recruitment process, affecting their perception of the company.
- Disconnection with corporate culture: The cultural fit of candidates with ACCIONA Energía's core values and competencies is not adequately assessed.
- Lack of digital tools: There are no clear indicators that would allow for more accurate decision-making and reduce the subjectivity and biases of the actors involved in the recruitment processes.

In order to develop a more efficient, objective recruitment model, aligned with the organisational culture and focused on improving the experience of those involved, ACCIONA Energía has designed two main lines of action for 2024:

1. Improving the Candidate Experience:

In order to optimise the experience of both internal and external candidates, several key initiatives have been implemented:

- **Redesign of the recruitment process (internal and external):** Stages, timelines and roles have been defined to ensure greater clarity and predictability in the processes.
- **Implementation of automatic notifications:** They keep candidates informed in real time at all stages of the process, making them feel cared for and valued.
- **Creation of a global Welcome E-mail:** This welcome e-mail is designed to convey a sense of belonging, motivation and connection to ACCIONA Energía's culture even before the candidate joins the company.

These improvements were implemented globally and in a cross-cutting manner during the third quarter of 2024, ensuring their applicability in all countries and areas of the organisation.

2. New Competency-Based Interview Model

A competency-based interview model has been developed to rigorously assess the cultural and technical fit of candidates with ACCIONA Energía's core values and competencies.

Main features:

- **Technology integration in Workday:** ACCIONA Energía's master people management tool now includes a functionality that guides recruiters through the application of the model, with:
 - A structured decalogue of questions aligned with the competency model.
 - Sets of questions adapted to each position.
- **Objective evaluation system:** After the interview, the tool generates a percentage of the candidate's fit with the position, providing:
 - An objective and standardised model for evaluation.
 - Detailed and professional reports improve the experience of hiring managers, facilitating more informed decisions aligned with the organisation's needs.

These improvements were designed in a comprehensive and cross-cutting manner during 2024, and will be implemented in the first quarter of 2025.

With these two strategic lines, ACCIONA Energía is not only moving towards a more efficient and professional recruitment model, but also reinforcing its positioning as an innovative and people-centred employer brand.

The company also places special emphasis on its employer branding strategy for young talent, which seeks to position the ACCIONA brand as a benchmark for the employability of this talent. Programmes implemented in this area in 2024 include:

- **Academy Programme:** It promotes employability and young talent with editions in several countries by providing training in soft skills and the learning by doing methodology. In 2024, 6

new editions of the Programme were deployed in Spain, Mexico, Chile, Peru, Brazil and North America with a total of 164 participants.

- **Fellowship Programme:** It facilitates the application of university knowledge. In 2024, 149 interns were recruited globally in 6 countries (Australia, Chile, Spain, United States, Mexico and Portugal).
- **Global Graduates Programme:** Comprehensive training, practical training and applicability of content aimed at recent graduates, with a focus on sustainability, project management, strategy and finance, and innovation. The 5th Edition of the Global Graduate Programme ended in 2024 with a total of 34 graduates from 6 different countries: Australia, Spain, the United States, Mexico, Peru and Poland.

Furthermore, ACCIONA Energía considers internal mobility essential for the development and motivation of its employees, allowing access to new positions within the company on a voluntary basis and through a recruitment process. The objectives are:

- Facilitate the professional development and adaptation of the employee to the position.
- Promote a culture of equal opportunities in diverse areas and territories.
- Encourage internal promotion to preserve knowledge and improve efficiency.

To this end, ACCIONA Energía carries out the following actions to encourage and facilitate internal mobility among employees:

1. Keep vacancies up to date on the internal talent management platform and distribute a weekly newsletter containing the most relevant vacancies. This provides a global talent pool and mobility of higher quality and efficiency.

2. International mobility questionnaire. Each year a completely voluntary questionnaire is launched to gather employees' interests in international mobility, considering short, medium and long term perspectives.

In 2024, a specific campaign was launched targeting the global Operation and Maintenance area. The purpose of this initiative is to identify and map the interests of professionals in this department. This will allow us to leverage internal talent and respond to complex recruitment demands in challenging markets such as the United States and Australia.

3. Data Talent Lake:

Having up-to-date information on mobility interests within the organisation allows for the identification and development of internal talent, aligning individual employee objectives with the company's strategic objectives. This not only fosters team satisfaction and engagement, but also strengthens the connection between talent and business.

The Data Talent Lake, an advanced internal data storage and management system, has been implemented for this purpose. This tool combines and analyses employee information, generating a global talent map. Thanks to the integration of artificial intelligence and an automatic filtering and pre-filtering system, the system can identify, in a matter of seconds, the internal candidates best aligned with the vacancies, sorted by compatibility level.

This innovative solution facilitates internal mobility, boosts employees' international career development and ensures greater alignment with strategic business needs.

4. Creation of the EGM (Energy Global Mobility) department to centralise and coordinate, from start to finish, international movements in all the countries in which the company operates. All of this, ensuring agility and transparency throughout the process and, above all, accompanying employees at the vital moment such as embarking on an international experience.

As a result of the above actions, the following milestones have been achieved in 2024, related to international internal mobility:

- The percentage of vacancies filled by internal mobility was 32.66%.
- Fourth edition of the international professional development programme, Role Swap Programme.

ACCIONA Energía's **Role Swap** Programme offers high-potential employees from the same department, but located in different countries, the opportunity to exchange positions on a temporary basis for three months. This initiative fosters an enriching and unique international professional development experience.

The programme not only broadens global perspectives and multicultural diversity, but also advances the professional growth of participants and facilitates the exchange of synergies and best practices between teams. This results in tangible benefits both in terms of retaining and developing internal talent and in improving ACCIONA Energía's operational efficiency.

In 2024, a total of 16 participants from countries such as Australia, Spain, the United States, France, India, Mexico and Chile took part in this programme.

This programme promotes the internal mobility of employees in technical and specialist roles to different countries, facilitating the acquisition of new competencies and skills, while strengthening global networking and cohesion between international areas.

- **"Tech Hub New Generation"** is an ACCIONA Energía initiative designed to foster professional development in the renewable energy sector among university students in the Tamaulipas region of Mexico. This programme offers free specialised training and the possibility of gaining work experience both nationally and internationally in energy projects.

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Protection, social benefits and work-life balance.

ACCIONA Energía ensures that all employees have robust social protection to support them in the face of significant life events such as illness, unemployment, occupational accidents, acquired disability, parental leave and retirement. This coverage is provided through public programmes and specific benefits provided by the company.

During 2024, ACCIONA Energía continued to offer additional social benefits to its employees, which seek to optimise remuneration and promote financial well-being, aligning the company's interests with those of its employees:

- Accident cover and life insurance policies for employees and expatriates.
- Travel assistance for business trips.
- Flexible Remuneration Plan through which employees can select, acquire and/or contract certain benefits with significant tax advantages that will allow them to maximise their remuneration, such as medical insurance, childcare vouchers, meal and transport card, training programmes, retirement savings plan and share purchase plan.

ACCIONA Energía also promotes the work-life balance to promote equality and support families. Measures include:

- Support for pregnant women: six-hour working days with no salary cuts, parking spaces and assistance with doctor's visits.
- Paid parental leave:
 - Main carer: Up to 19 weeks of leave is granted, exceeding legal requirements in some countries, to provide greater support to the primary caregiver.
 - Secondary carer: Up to 19 weeks of paid leave is offered for the secondary carer, adjusted according to the legal regulations in force in each country.
- Programme for parents of seriously ill children: part-time without pay reduction.
- Improvement of the policy of advances for child care.



These measures are complemented by flexible working options, canteen services, medical centres, breastfeeding rooms and childcare facilities, among others. ACCIONA Energía also respects the right to digital disconnection and has created a Leave Review Committee to ensure equal access to these measures.

Health and safety in the workplace

Responsibility for Health and Safety at ACCIONA Energía is integrated across the board. The company implements programmes to improve organisational behaviour, identify potential risks and prevent them with a view to optimising the health and safety climate.

All of ACCIONA Energía's workers participate in programmes aimed at preventing and correcting the root causes of health and safety risks in the workplace. The goal is to create a safer and healthier workplace for employees and contractors.

The entire activity of the company, in all the countries where it operates, is covered by an occupational risk prevention management system, certified under the ISO 45001 standard. Under this standard, and through compliance with the applicable legislation in each territory in which it operates, the company develops the necessary guidelines and procedures to guarantee health and safety in the workplace. This includes the identification and assessment of risks associated with facilities, activities, work equipment, hazardous substances and particularly dangerous work, among others; the implementation of preventive and corrective measures; training and information, participation and provision of equipment and means of protection to workers; and the promotion of a safety culture involving all levels of the organisation.

Some of the additional measures implemented during 2024 in the area of workplace safety were as follows:

- Updating of the "THINK SAFE" Health and Safety awareness programme, with the aim of continuing its implementation among the groups that have joined ACCIONA Energía in recent years.
- Digitisation of the training in the Safety Plans of projects in the construction phase, to facilitate access to it.
- Optimisation of the Safety Induction platform in construction projects, obtaining greater efficiency and better use of the most relevant content.
- Dissemination of protocols and information notes on the prevention of risks derived from high temperatures.
- Continuation of the "DRIVE SAFE" road safety awareness programme.

In addition, in the area of occupational health, some of the initiatives developed during 2024 as part of ACCIONA's Health and Well-being Programme, which includes ACCIONA Energía, were as follows:

- Face-to-face mindfulness sessions and meeting points with work psychology professionals in the framework of emotional health and work stress management.
- Meeting points with professionals in the area of nutrition and healthy eating.

- Promotion of programmes such as the Healthy Cities and eHealth Challenge that promote physical activity through participation in local sporting events.
- Holding of awareness and early detection campaigns.

In addition, ACCIONA has a medical and nursing consultation service at its headquarters, which has been complemented by medical and health experts in the following specialities: traumatology, pulmonology, dermatology, internal medicine, cardiology, urology, radiology, physiotherapy, nutrition and psychology. All this service is available to ACCIONA Energía employees. Some of these services are also available to all employees, even if they are not located at the head office, via video consultation.

D. LEADERSHIP AND ACCESS TO RIGHTS.

Knowledge management.

Leadership is a fundamental basis of ACCIONA Energía's PEOPLE strategy. It focuses on developing leaders who are skilled and aligned with the business objectives and purpose of the organisation, appreciating the diversity of their team.

ACCIONA Energía has implemented a people management model that defines roles as key organisational units, grouping positions with common missions, responsibilities and skills. Knowledge management enriches this model by identifying essential skills, fostering a collaborative culture and transforming individual expertise into a collective intellectual heritage.

The main lines of action in leadership and knowledge management within ACCIONA Energía are:

- **O&M Academy:** in which the knowledge created in the Operation and Maintenance area is distributed through a series of training and tutoring actions so that all members of this academy can benefit from it and transform it into shared knowledge, through the dissemination of best practices and company culture in a cross-cutting and international way to all teams.

The 2nd edition of this initiative was launched in 2024. For this, 50 employees have been selected and divided into 5 task forces, each with a business challenge and an assigned tutor, who will guide and advise them throughout this experience. This initiative is described in earlier sections of this chapter.

The content of this programme is structured around three main pillars:

- a. Competence sessions for tutors. From the Talent function we have designed a competence plan for the figure of the tutors with the aim of accompanying them in their new challenge of: (a) managing high-performing international teams, without hierarchical superiority over them; (b) guiding them and accelerating results in a context of business growth; (c) managing transversal projects (matrix structure of the organisation).
 - b. A solid theoretical basis: competency-based sessions for the 50 participants, specialised in two key skills in their role within the Programme, which will help them to face the new challenges:
 - The power of influence
 - Productivity
 - c. Tutorials. Monthly meetings of each group with their assigned tutor, in which they will be able to apply the theoretical knowledge learned, with the guidance and orientation of the tutors.
- **Turn the Ship Around** is an initiative driven by the local Human Resources team in the United States, with the aim of translating the leadership concepts of David Marquet's book "Turn the Ship Around" into concrete actions to improve performance and work culture on a day-to-day basis.

The book, which recounts David Marquet's experience as captain of the submarine USS Santa Fe, adopts an approach that encourages individual responsibility, proactivity and decentralised decision-making, leading to more committed and efficient teams.

The purpose of this initiative has been to adopt these principles so that the organisation evolves towards a leader-leader structure rather than the traditional leader-follower one. This seeks to foster proactivity, empower teams in decision-making and strengthen an organisational culture where each person feels they have a significant impact on results.

In the last quarter of 2024, this initiative was launched and includes the participation of the entire ACCIONA Energía organisation in the United States, involving more than 200 people.

- Task Forces and Chiefs:
 - Various task forces were set up to address the concepts in the book and apply them in practical situations.
 - Each group has a Chief, chosen to lead and organise the sessions, ensuring that key messages are conveyed, and that participants are actively involved.
- Pilot in the Operation and Maintenance (O&M) Area
 - In the O&M area, due to its operational and field nature, a pilot was implemented in a specific park.
 - This pilot will make it possible to assess the feasibility of extending the model to the rest of the equipment in wind farms, creating a scalable methodology.

This initiative not only symbolises an evolution in the leadership structure, but also a commitment to continuous improvement, empowered team building and cultural transformation at ACCIONA Energía in the United States, having a tangible impact on productivity, innovation and employee well-being.

- **Australian Leadership Program.** The local HR team in Australia has developed a leadership programme that gives managers the confidence to navigate the complexities and empower their teams to drive business results. Managers will obtain a greater aptitude for leadership, deeper internal and external relationships and a strategic skill set to become leaders in Acciona Energía. This project not only has an impact on the professional development of our managers, but also impacts the organisation and the business.

Through this integrated, multi-layered programme, Acciona Energía supports the development of both individual leaders and the organisation's leadership capacity and culture. This approach maximises the impact of the programme on individual leaders and develops a sustainable leadership culture.

- **New Leader Programme** (1 session per week, for a total of five weeks). The audience consists of new managers who have just taken up their position, as well as managers who are already established but need to learn the basics of leadership. In this first “layer”/“level” of the programme, the aim is to equip these leaders with basic leadership skills:

- Confidence of the leader
 - Applying leadership practices in the team
 - Positive team performance.
- **Senior Leader Programme** (17 participants. 1 session per month, for a total of 6 months). The audience is experienced managers, leaders of leaders and leaders with responsibility for the execution of ACCIONA Energía Australia's organisational strategy. In this second layer or level, we aim to improve the leader's ability to lead different functions and teams and to maximise the impact on people and performance.
 - Self and system awareness
 - People performance
 - Executing the strategy
- **Executive Leader Programme** (11 participants. 8 sessions per year). The audience is the executive leaders responsible for leading the organisation (strategy, culture, change and innovation) into the future. In this final layer of the programme, the aim is to empower executive leaders to meet the needs of business leadership and adaptive organisational transformation.
 - Strategic thinking and influence
 - Organisational culture development
 - Teamwork at executive level

Training

ACCIONA University is an internal institution within the framework of the PEOPLE strategy to promote learning with the latest methods. It offers high quality programmes, aligned with business needs and regularly updated. The internal faculty consists of qualified professionals with practical experience, and the quality of training and external faculty is maintained through regular evaluations. This ensures exceptional training that benefits both employees and the company.

It is structured in four main schools, whose training programmes during 2024 were:

Focused Programmes

As can be seen from the name of the school, it focuses on the delivery of training programmes focused on specific groups and areas in the company.

- **iGEP:** Global executive programme for knowledge sharing and leadership. 20 executives have started the 2nd Edition of the programme created together with IE Business School, the Financial Times and ACCIONA. 5 ACCIONA Energía executives took part in the 2024 edition.
- **iMPA:** Master in Project Management, in collaboration with international universities. It is focused on boosting the career of Projects Leaders in a postgraduate degree of the Universidad Politécnica de Madrid (UPM). The aim is to consolidate their role and provide them with the tools to develop project management skills in the company's countries and businesses.

- **IWAT (International Women Acceleration Track):** This global programme, co-designed with Manchester University and Nebrija University, aims to boost the careers of junior female managers. The second edition which ended in 2024 had 6 participants from ACCIONA Energía from 4 different countries: Australia, Croatia, Spain and Poland.
- **iMBA: Master in Business Administration,** co-designed with the EOI Business School. The 11th edition of the event was attended by the Alliance Manchester Business School of the University of Manchester.
- **iSEP:** Skills programme for managers, addressing topics such as digital transformation and project management. Co-designed by IE Business School, the Financial Times and the academic committee of ACCIONA University, 2024 involved faculty from the University of Sao Paulo, the Instituto Tecnológico de Monterrey and the University of Technology Sydney.
- **iXPA:** Specialisation programme in project management. Designed jointly with the UPM.

Between September and December 2024, ACCIONA Energía launched the pilot training programme "AI to improve productivity", developed in collaboration with The Valley business school. This five-week hybrid programme was aimed at ACCIONA Energía's Human Resources (7 participants) and Digital Transformation (8 participants) teams, with the aim of boosting their skills in artificial intelligence applied to the business environment.

Technical Academies

ACCIONA University Academies are fundamental to its training model, focusing on developing key competencies in technical areas and critical functions. They use an agile and scalable model that combines classroom, online and on-the-job training. They encourage collaboration and participation of experts from across the company, promoting a culture of continuous learning. These academies provide employees with the skills they need to succeed in their roles and are at the forefront of technical training.

The main line of action in knowledge management within ACCIONA Energía is the creation of the O&M Academy, a technical academy in which the knowledge created in the Operation and Maintenance area is distributed through a series of training and tutoring actions so that all members of this academy can benefit from it and transform it into shared knowledge, through the dissemination of best practices and company culture in a cross-cutting and international way to all teams. This Academy has been explained in earlier sections of this chapter.

Following the IPO in 2021, Acciona Energía is committed to achieving a series of milestones in its new strategic plan, which require the collective effort of the entire business. To accelerate the achievement of these results, the Operation & Maintenance team, together with the support of Talent, is developing a global O&M Academy.

This Academy seeks to accelerate the achievement of the objectives and results of the Operation & Maintenance area, in a context of business growth and internal reorganisation towards a matrix structure, by disseminating best practices and company culture transversally and internationally to all teams.

In 2024, we launched the 2nd edition of this initiative. For this, 50 employees have been selected and divided into 5 task forces, each with a business challenge and an assigned tutor, who will guide and advise them throughout this experience.

The content of this programme is structured around three main pillars:

1. Competence sessions for tutors. From the Talent function we have designed a competence plan for the figure of the tutors with the aim of accompanying them in their new challenge of: (a) managing high-performing international teams, without hierarchical superiority over them; (b) guiding them and accelerating results in a context of business growth; (c) managing transversal projects (matrix structure of the organisation).
2. A solid theoretical basis: competency-based sessions for the 50 participants, specialised in two key skills in their role within the Programme, which will help them to face the new challenges:
 - The power of influence
 - Productivity
3. Tutorials. Monthly meetings of each group with their assigned tutor, in which they will be able to apply the theoretical knowledge learned, with the guidance and orientation of the tutors.

Open Programs

Designed and available for all employees, regardless of their role or location, with the aim of offering an open training and micro-learning model, they represent ACCIONA Energía's commitment to the continuous development of people and the creation of an inclusive and enriching workplace.

The Open Programs address key areas for the personal and professional growth of employees. They are based on core competencies and cover the following broad themes: technical knowledge, innovation and digital transformation, equality, diversity and inclusion, health and well-being, technological efficiency, leadership, results orientation, teamwork and optimised productivity, creative thinking and language school, within an open catalogue of more than 1,000 programmes.

All these courses are designed to be engaging and interactive, allowing employees to learn at their own pace and according to their needs.

Mandatory Programs

These programmes represent the basic training that all ACCIONA Energía employees must complete and are classified as follows: Code of Conduct, Compliance, Equality, Diversity and Inclusion, Legal, Health and Safety, Sustainability and Information Security.

In addition, during 2024, ACCIONA Energía revalidated its commitment to training non-employees:

Dual Vocational Training

Professional Certificates are official qualifications issued in collaboration with the Government of Navarre, which accredit that a person is qualified to perform all the functions defined in a job, in accordance with the National Catalogue of Professional Qualifications. They are valid throughout Spain and are issued by the labour administration.

They are obtained through two channels:

- Formal training.
- Recognition of work experience

There are two types of certificates:

1. Hydraulics Certificates:
 - Hydroelectric Power Plants (ENA473_3)
 - Electrical Substations (ENA474_4)
2. Biomass Certificates:
 - a. Hydroelectric Power Plants (ENA359_3)
 - b. Electrical Substations (ENA474_4)

In ACCIONA Energía, during 2024, 19 people were accredited to assess and evaluate in the professional competencies accreditation procedure. They received the required 32 hours of training that qualifies them to act as assessors in accreditation processes.

In addition, processes are in place to identify and manage the impacts and risks associated with training, which may be related to gaps identified in the performance assessment process:

- **Assessment of Training Needs:** this process involves identifying specific training and competence development needs for employees, considering the material impacts, risks and opportunities (Upskilling - Reskilling - need for sustainability training in some key functions of the company) identified through the materiality assessment. This process was completed in the last quarter of 2024, and all countries in which ACCIONA Energía operates have participated.

The information obtained is used to develop training programmes that address identified needs and promote personal organisational growth and efficiency, thus contributing to the company's overall success.

- **Risk Assessment:** A risk assessment is conducted to identify potential sustainability-related risks that could impact operations and reputation.
- **Evaluation of training effectiveness:** with the implementation of this process, the aim is to measure and analyse the impact of the training developed in ACCIONA Energía throughout the year. The evaluation of training effectiveness enables the organisation to continually adjust and improve its training programmes to ensure that they are aligned with organisational objectives and contribute to employee development, as two key indicators are assessed:
 - Impact on employee performance
 - Impact on business results
 - On-boarding: The on-boarding process of new employees has also helped to identify training-related impacts and risks by assessing the information provided at this stage and

the alignment with the organisation's objectives. By assessing these aspects during on-boarding, it is possible to anticipate areas for improvement and possible challenges, and thus to adjust training to achieve a good integration and optimal performance of the new employee.

Decent work

ACCIONA Energía bases its commitment to decent work on the principles of its Code of Conduct and Policies presented in section S1-1, which all company managers and employees explicitly undertake to abide by.

ACCIONA Energía has processes in place to collaborate with its own workers and workers' representatives, providing them with channels to raise their concerns and having processes in place to remedy potential negative impacts, as presented in sections S1-2 and S1-3.

Similarly, the company has annual Human Rights Due Diligence processes as presented in section Gov-4 of this report.

METRICS AND TARGETS

[S1-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

The company has various objectives, developed and overseen by the Human Resources Department, within the framework of the PEOPLE strategy, on the various matters relating to its own employees, including those identified as material, which fall within the scope of the intentions and principles defined in the policies highlighted in section S1-1:

A. MERIT AND RECOGNITION.

Performance assessment

The performance assessment model provides guidelines for the Manager to have Development Conversations with his team. These conversations provide clarity on expectations and how each team member can do their best in their role.

The result of the performance appraisal or Performance Status process makes it possible to understand and recognise employees on an individual level (strengths, interests, expectations) and to manage them with a business and future vision (promotions, mobility, succession plans, etc.). This exercise will, in turn, allow for the establishment of Individual Development Plans, adapted to each case.

In 2024, a total of 3,104 performance appraisals were carried out at ACCIONA Energía, and a total of 181 employees had their functional level (role) in the company increased.

Talent development and promotion

The objective in this area is to provide 100% of the identified target group with access to competency development programmes.



By 2024, this objective had been met.

Wage remuneration

The objective is to contribute to the retention and motivation of our own employees in meeting the company's strategic objectives. Each year, there is a specific communication on the achievement of the ACCIONA Bonus, which includes financial, sustainability and investment objectives.

In addition, specific objectives for the following year are communicated for the group with target variable remuneration eligible for the ACCIONA Bonus, with different variable remuneration models depending on the circumstances of each business line.

The pay review process at ACCIONA Energía differentiates between two groups: white and blue collars. The aggregate review for both groups has meant a pay review for 2,560 employees.

The level of achievement of the ACCIONA bonus is determined by financial, sustainability and individual metrics. The average achievement of the ACCIONA bonus is determined according to each business area, country and variable remuneration plan assigned to each person; during 2024, 17 annual variable remuneration plans were defined and assigned to the eligible group with target variable remuneration. In this context, the aggregate average achievement of all average remuneration plans amounted to 97% globally.

B. DIVERSITY AND INCLUSION.

The company firmly believes that diversity and inclusion are essential pillars to generate value and strengthen its performance. With the aim of being a benchmark in this area, we work continuously to implement initiatives that promote equity and inclusion. The recognitions received, the endorsements of key initiatives and the certifications obtained are a testament to the commitment and progress made in building inclusive environments.

In 2024, ACCIONA:

- Has been recognised for the third consecutive year as a leading company in diversity by Statista and Financial Times Diversity Leaders.
- It is part of the Bloomberg Gender-Equality Index (GEI) 2023, which recognises the companies with the greatest transparency and performance in gender equality in the last fiscal year.
- It is a signatory of the Women's Empowerment Principles of the UN Global Compact, promoting gender equality through seven action principles in the labour, social, educational and health and well-being fields.
- It is part of the Target Gender Equality project accelerating its contribution towards Sustainable Development Goal (SDG) 5, which aims to achieve gender equality.
- It is also a signatory of the Diversity Charter in Spain promoted by the European Commission.
- It has been recognised for its commitment to inclusive policies through certifications such as Bequal Plus 80 and membership in networks and organisations devoted to the inclusion of people with disabilities in the workplace.
- It has joined REDI, the Business Network Association for LGBTI Diversity and Inclusion (REDI), the first ecosystem of companies and professionals in Spain working to promote safe and

respectful work environments for all people, regardless of their identity, gender expression or sexual orientation.

- ACCIONA Energía has been awarded the Equality in the Workplace Seal, the only corporate gender-related award in Spain.

Gender equality.

ACCIONA Energía has established targets linked to specific gender diversity indicators. These targets reflect the company's commitment to equality between women and men, creating an inclusive and equitable environment where all people can develop their full potential.

- Link diversity targets to variable remuneration: Target met in 2024, being linked to the increase in the percentage of women in management positions, and forming part of the global linking of variable remuneration to the achievement of sustainability objectives.
- Achieve gender equality on the Board of Directors. The percentage of women on the board is currently 36.36%.
- Increase the percentage of women in executive and management positions. The percentage of women in these positions is currently 27.2%.
- Close the gender pay gap. This brings the current value of the pay gap to 2.96%.

Disability in Spain

The average number of employees with disability level of at least 33% was 81 workers in Spain (direct and indirect employment), compared to 61 in 2023. The compliance rate with Royal Legislative Decree 1/2013 of 29 November was 4.28% (3.96% in 2023). 1.86% were for direct hires, while the rest comes from contributions through purchases to Special Job Centres and donations to third sector organisations boosting workplace inclusion for people with disability.

Of the total number of people with disabilities in the company, 26% are women.

C. TRANSFORMATIVE ENVIRONMENTS

The company's objective in this area is related to the internal and external recognition of ACCIONA Energía as a benchmark place to work.

Internally, ACCIONA Energía has obtained a rating in the annual employee survey Engagement & Sustainability Global Barometer that places the level of employee engagement and satisfaction at 66% in 2024.

This year, 1,729 employees took part in the survey, 58% of the total number of employees invited to answer the survey.

Externally, ACCIONA Energía has renewed the Top Employer certification which acknowledges the company as one of the best companies to work for in Spain, Canada, United States, Brazil, Mexico, Australia, South Africa and Chile, and also obtained the continental seal in North America. Portugal also achieved certification in 2024.

ACCIONA has also been awarded the Enterprise Seal, a newly-created seal aimed at giving additional recognition to companies certified as Top Employers in at least 10 countries where at least 95% of its

total global workforce is employed. Of the more than 2,000 companies certified as Top Employer, only 9 have obtained this award.

ACCIONA Energía has also received the following awards in the area of health and safety:

- Recognition by the European Agency for Safety and Health at Work (EU-OSHA) on Smart Digital Systems and Health and Safety of the Smart Centre Development.
- Recognition with first prize in the category of “Best practice of healthy habits in the workplace” at the Asepeyo Awards, ex aequo.

Occupational Health and Safety

In addition to the company’s recognition-related objectives, ACCIONA Energía has an objective to reduce the number of occupational accidents, aiming for an ideal goal of zero accidents in the workplace.

In 2024, the accident frequency rate for own employees was 0.26 and the number of fatal accidents in this group was 0 (vs. 0.35 and 1 respectively in 2023).

Worth highlighting is the continuous and sustained improvement in recent years in the frequency rate of accidents involving own and subcontracted staff, compared to the increase in fatal and very serious accidents in the last six months of 2024.

In 2024, the accident frequency rate for own and subcontracted employees was 0.34, 13% lower than the previous year, with 7% more hours worked.

The number of fatal accidents among subcontracted workers was 3, two in Spain and one in Mexico. This situation has led to an in-depth and detailed analysis of all contributing factors, which has resulted in a Fatal Accident Action Plan, designed at the end of 2024 for implementation during 2025.

The priority pillars for action in this Plan are:

- Actions to improve and ensure the health and safety commitment of the Middle Management function.
- Actions to ensure that the most critical health and safety risks have been taken into account during work planning.
- Awareness-raising actions for our own and external workers on the most critical risks present in our activities: work at heights, work with electrical hazards, handling large components, entrapment and road safety.
- Actions to achieve strict discipline in complying with health and safety regulations.
- Actions to ensure that workers who are to perform a job have the appropriate skills to do so safely.
- Actions to monitor the health and safety performance of subcontractors.

This Action Plan was launched at the end of 2024 and communicated by the CEO to the entire organisation.

D. LEADERSHIP AND ACCESS TO RIGHTS.

Decent work

In this area, the company's objective is defined in its Code of Conduct and related policies in section S1-1, and it is to respect and protect human rights in all its activities and geographical areas, respecting and contributing to the effective application of the International Bill of Human Rights.

To monitor the degree of achievement of this objective, ACCIONA Energía monitors the company's performance based on the analysis of indicators that can be consulted in section S1-17 of this chapter.

[S1-6] CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES.

For more information on the key characteristics of the company's employees, see the data tables below, as well as those included in the section “Additional information, including that required by Law 11/2018 to which the CSRD (Delegated Regulation (EU) 2023/2772) does not provide a response”. Available later in this chapter.

Employees by gender¹⁹

Gender	Number of employees 2024 (number of persons) (FTE)
Men	2,388
Women	837
Total number of employees	3,224

Fte: (Σ days worked employed in the period x (% working day) / Days period)

Employees by country (countries with more than 50 employees)¹

	Number of employees 2024 (FTE)	Percentage of total number of employees (%)
Spain	1,939	60.13%
Australia	293	9.08%
Mexico	275	8.52%
United States	254	7.88%
Chile	135	4.19%
France	65	2.00%
South Africa	57	1.77%
Other	207	6.43%
Total number of employees	3,224	

Fte: (Σ days worked employed in the period x (% working day) / Days period)

¹⁹ See also Note 25 to ACCIONA Energía's 2024 Financial Statements.

Employees by type of contract and gender

2024				
Women	Men	Other	Not communicated	Total
No. of employees (FTE)				
837	2,388			3,224
No. of permanent employees (FTE)				
791	2,325			3,116
No. of temporary employees (FTE)				
46	62			108

Fte: $(\sum \text{days worked employed in the period} \times (\% \text{ working day})) / \text{Days period}$

The methodology for calculating the average workforce is based on the financial consolidation perimeter established by the company. The average workforce is calculated using the following formula: $\text{FTE} = (\sum \text{days worked per employee during the period} \times (\% \text{ working day})) / \text{Days of the period}$. It should be noted that the days of the reported period correspond to the entire financial year 2024. The source of information used for this calculation is Workday (HCM).

The average consolidated workforce in December 2024 was 3,224, an increase of 125 FTEs (+4%) compared to December 2023. Variations are mainly concentrated in Spain and Australia.

The hiring of temporary contract workers meets the need to adapt the workforce to specific project cycles, allowing for efficient human resources management. This also represents a valuable employment opportunity for the communities in the areas where the company operates, contributing to local development and the economic well-being of the region.

ACCIONA Energía has employees in various countries, among which the description of the type of contract may differ. The data table presented considers the descriptions for each country.

Employees who have left the company and employee turnover rates

	2024
Employees who have left the company (no. of persons)	183
Turnover rate (%)	5.48%

HC: number of employees who have left the company voluntarily during the period

To calculate this KPI, the aggregate number of employees leaving employment voluntarily or due to dismissal, retirement or death in service in 2024 divided by the reported average headcount was taken into account.

[S1-7] CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

	2024
No. of non-employees (indicate if no. of persons or FTE)	1,892

Referred to as the absolute number of people working for companies contractually linked to ACCIONA Energía in ACCIONA Energía's workplaces over a given period of time. It is counted as the average number of people working daily in the given time period.

[S1-8] COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

The total percentage of employees covered by collective bargaining agreements in 2024 was 100%. In the European Economic Area, the company had a total of 24 collective bargaining agreements.

The coverage of collective bargaining and social dialogue by country or region was:

	2024		
	Collective bargaining coverage		Social dialogue
Coverage rate	Employees - EEA (for countries with > 50 employees representing > 10% of total employees)	Employees - Non-EEA (estimated for regions with > 50 employees representing > 10% of total employees)	Workplace representation (EEA only) (for countries with > 50 employees representing > 10 % of total employees).
0% - 19%			
20% - 39%			
40% - 59%		Asia and Oceania	
60% - 79%			
80% - 100%	Spain, Poland, Italy, France,	Europe, North America, Central and South America, Africa	Spain, Poland, France

Collective agreements and/or conditions are signed in all countries, except in those where union membership or representation is not a standard practice or is considered illegal. In these situations, mechanisms have been established to control the agreed conditions, which apply to both the company and its suppliers, in the form of internal regulations, as well as systems for external auditing and verification of compliance with the labour obligations agreed in the contract and compliance with the obligations derived from the principles of decent work, including, among others, accommodation conditions, passports, elimination of fines on wages and freedom to terminate the employment relationship by the employee's decision.



[S1-9] DIVERSITY METRICS

	2024			
	Women	Men	Other	Not communicated
Executive and management positions vs. total executive and management positions (%)				
Executives	21.28%	78.72%		
Managers	27.72%	72.28%		

2024		
No. of employees by age group (FTE)		
<31	31-50	>50
543.61 (16.86%).	2,229.03 (69.13%).	451.69 (14.01%).

[S1-10] ADEQUATE WAGES

ACCIONA Energía guarantees access to an adequate salary that meets the needs of its employees and their families, taking into account the economic and social conditions of the countries in which it operates. The company always ensures that at least the statutory minimum wages and workers' collective bargaining agreements determined by each state are met, taking into account purchasing power and national productivity developments, as well as wage levels, distribution and growth.

Remuneration for those employees with agreed salaries is determined taking into account the data and market practice in the country and on the basis of what is defined in the tables of the various applicable collective bargaining agreements. To this end, external competitive analyses are carried out regularly to define the remuneration benchmarks for each country, using market data from other companies with a presence in said country and acquired from suppliers with international experience in the field of remuneration. In any case, the minimum remuneration established in each country by law or by collective agreements, as the case may be, is respected.

All company employees receive a salary in line with the applicable benchmarks. In the European Economic Area, it is in line with Directive (EU) 2022/2041, national legislation or collective bargaining, guaranteeing a minimum based on comparative wage criteria. Outside this region, national regulations, collective agreements or similar wage references are followed to ensure fair remuneration.

[S1-11] SOCIAL PROTECTION

ACCIONA Energía seeks to ensure that all employees have robust social protection to support them in the face of significant life events such as illness, unemployment, occupational accidents, acquired

disability, parental leave and retirement. This coverage is provided through public programmes and company-provided benefits.

[S1-12] PERSONS WITH DISABILITIES

	2024
Employees with disabilities (no. of persons <u>in direct employment</u>)	31.55
Employees with disabilities of total number of employees (%)	0.98%

The average number of employees with a disability level of at least 33% was 81 workers in Spain (direct and indirect employment), compared to 61 in 2023.

For Spain, the compliance rate with Royal Legislative Decree 1/2013 of 29 November was 4.28% (3.96% in 2023). 1.86% (32 employees) were for direct hires, while the rest comes from contributions through purchases to Special Job Centres and donations to third sector organisations boosting workplace inclusion for people with disability. Of the total number of people with disabilities in the company, 26% are women.

These data have been calculated in accordance with the applicable regulations in the various countries in which the company operates, subject to data collection legislation.

[S1-13] TRAINING AND SKILLS DEVELOPMENT METRICS

	Women	Men	Other	Not communicated
Employees who participated in performance and professional development appraisals (%) *	98.68%	98.91%		
Average hours of training	47.27	44.78		

*Percentage of total number of assessable employees

The number of performance appraisals reported matches the number of reviews agreed by management, with the exception of those employees who may have left during the year.

[S1-14] HEALTH AND SAFETY METRICS

	Employees	Non-employees
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Coverage of the company's health and safety management system based on legal requirements or recognised standards or guidelines (%)	100%	100%
Deaths resulting from work-related injuries and health problems	0	3
Number of accidents	Men: 48 (vs 23 in 2023) Women: 1 (vs 0 in 2023) Total: 49 (vs 23 in 2023)	80 (vs 53 in 2023)
Work-related injury rate	6.95	7.69
Accident frequency rate	Men: 0.34 (vs 0.47 in 2023) Women: 0.00 (vs 0.00 in 2023) Total: 0.26 (vs 0.35 in 2023)	0.40 (vs 0.45 in 2023)
Accident severity rate	Men: 7.40 (vs 2.87 in 2023) Women: 0.00 (vs 0.00 in 2023) Total: 5.53 (vs 2.14 in 2023)	7.25 (vs 7.41 in 2023)
Number of cases of recordable work-related health problems	0	0
Number of days lost due to work-related injuries and deaths as a result of occupational accidents, work-related health problems and deaths due to illness	195	437

Work-related injury rate (no. of recordable accidents/hours worked) x 1,000,000. It does not include commuting accidents

Frequency rate: (no. of lost time accidents/hours worked) x 200,000. It does not include commuting accidents.

Severity rate: (no. of working days lost due to work accident/hours worked) x 200,000.

[S1-15] WORK-LIFE BALANCE

Almost all of the company's employees are entitled to family leave, in accordance with the policies and collective bargaining agreements in force in each location.

	2023			2024		
DATA*	Men	Women	Total	Men	Women	Total
Number of employees with the right to maternity/paternity leave	86	14	100	103	21	124
Number of employees who took maternity/paternity leave	86	14	100	103	21	124
Number of employees who returned to work after taking maternity/paternity leave	86	14	100	102	21	123
Number of employees who returned to work after taking maternity/paternity leave and remained in their jobs twelve months after returning to work	82	14	100	102	21	123
Retention ratio	95%	100%	96%	99.03%	100.00%	99.19%

*The following table presents detailed information on employees in Spain who are entitled to paid work-life balance leave.

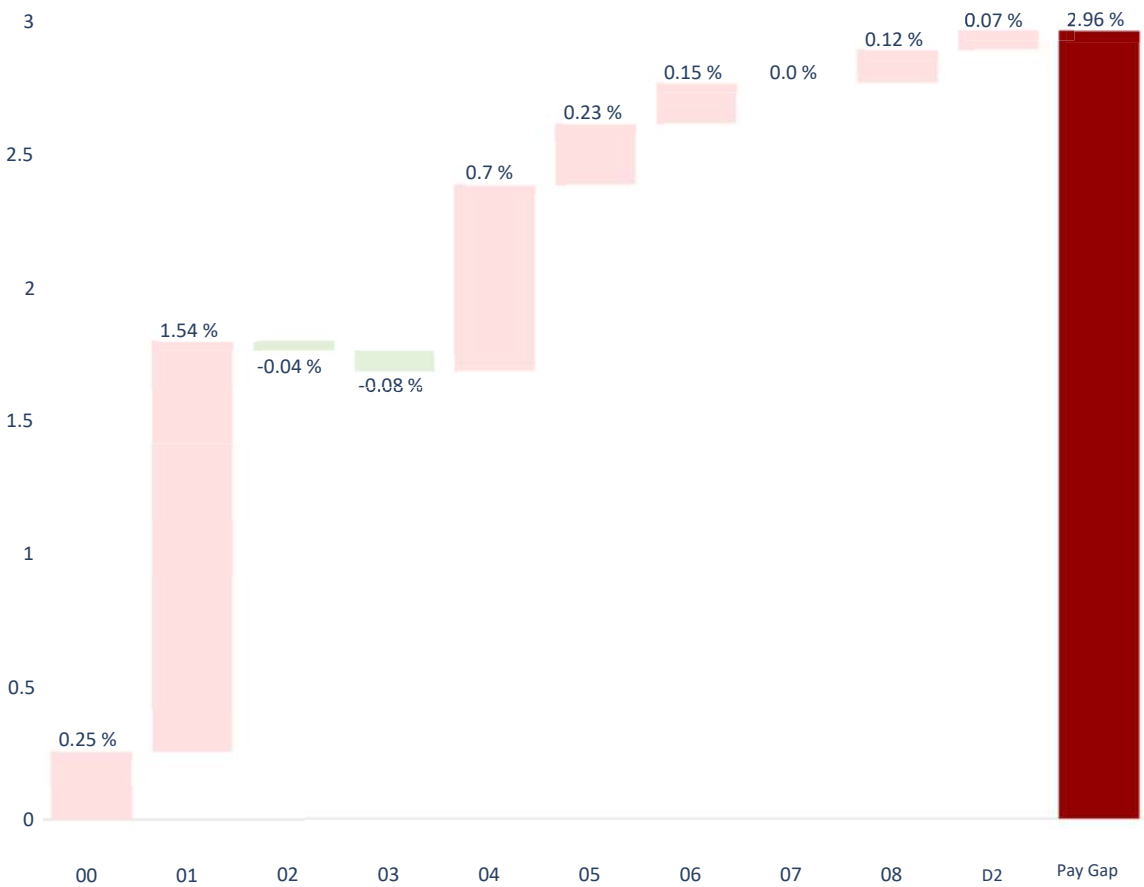
**The ratio includes the number of employees remaining in their jobs on 31 December 2024 after having taken paternity/maternity leave in 2024 between the number of employees on paternity/maternity leaves that took place in that year.

[S1-16] COMPENSATION METRICS (PAY GAP AND TOTAL COMPENSATION)

For this indicator the definitions aligned with Law 11/2018 are followed, and are therefore comparable with previous years; this indicator is not aligned with the definition of the indicator according to the CSRD directive. This is because ACCIONA Energía does not have data on average gross hourly pay by gender at the time this report was prepared.

	2023	2024
Pay gap (%)	1.29 %	2.96%

Gender Pay Equity Analysis (Equal Pay)
Weighted Gender Equality



In 2024, ACCIONA Energía reported a global pay gap between men and women of 2.96%, (1.29% in 2023). The increase in the company's pay gap with respect to the previous year is due to the incorporation and adaptation of the remuneration conditions of the employees of a specific company to the ACCIONA Energía Collective Bargaining Agreement in Spain.

The gender pay gap analysis are based on a methodology that considers the best international practices in a global and weighted manner. According to the definition of “equal pay”, we isolate from the analysis all those variables that might explain a person’s salary above and beyond gender. It takes into account the applicable variables of country, business, society, professional classification and collective bargaining agreement. Also, a level map is



used to group the business and support roles. The executive level has been broken down by reporting level (D1, D2, D3, D4 and D5), managing to isolate any potential deviations.

This estimate determines standardised segments of population (comparison clusters) on which salary differences between men and women are measured, providing a high degree of reliability in which gender pay gaps are effectively addressed.

To determine the fairness of each segment we use the following formula:

Equal pay by segment = (average fixed salary for men– average fixed salary for women) / average fixed salary for men

To calculate the pay gap, we weight this indicator based on the weight of each group (comparison cluster).

With this information, data is analysed annually by business line, country and level to define whether there is gender inequality in positions of equal value or whether the difference is due to any other cause (seniority, organisational seniority, performance, results, etc.). Specifically, the established objective is to eliminate any situations of gender inequality that may be detected; to this end, a specific analysis of inequitable remuneration situations is carried out annually, using the annual pay review process in each business unit. The action plan is periodically monitored by management, who assesses the progress being made in each country and at every level in the organisation.

	2024
Highest average wage/salary, excluding the highest paid individual	13.5

Calculated as the ratio of the total annual compensation of the highest paid person in the company to the average total annual compensation of employees (excluding the highest paid individual in the company). The compensation calculation takes into account: Base salary, cash allowances, bonuses, commissions, cash profit-sharing and other forms of variable cash payments, in-kind benefits such as cars, private health insurance, life insurance, well-being programmes and the total fair value of all annual long-term incentives (e.g., stock option awards, restricted stock or shares, performance shares or units, phantom shares, stock appreciation rights and long-term cash benefits).

S1-17 INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

	2024
Total number of own workers cases of reported discrimination including harassment	0
Number of own worker notifications through dedicated communication channels regarding other concerns, excluding those related to discrimination cases (including harassment).	39
Amount of fines, penalties and damages resulting from the above cases	0

	2024
Number of identified cases of serious human rights incidents* related to company staff	0
Amount of fines, penalties and damages resulting from the above cases	0

*For example, forced labour, human trafficking or child labour. They include cases of lawsuits, formal complaints through the company or third party reporting mechanisms, serious allegations in public reports or in the media, where these relate to the company's own workers, and incidents that are not contested by the company, as well as any other serious incidents of which the company becomes aware.



[ENTITY-SPECIFIC]. ADDITIONAL INFORMATION, INCLUDING THAT REQUIRED BY LAW 11/2018 TO WHICH THE CSRD DOES NOT RESPOND (DELEGATED REGULATION (EU) 2023/2772).

MANAGEMENT

Note. The calculation methodology may use values with decimals that will later be rounded off.

Management indicators	2023	2024
Revenue (million euros)	3,547	3,048
Workforce cost/revenue (%)	7.2%	8.9%
Revenue/workforce (euros)	1,161,428	945,409
EBITDA (million euros)	1,285	1,123
EBITDA/workforce cost (%)	20%	24%
EBITDA/workforce (euros)	420,760	348,325
Workforce cost (million euros)	256	272

EMPLOYEE DISTRIBUTION

Note. The calculation methodology may use values with decimals that will later be rounded off.

Workforce by professional category (FTEs)	2023	2024
Executives and managers	634	687
Technical staff	1,333	1,413
Support staff	123	132
Operators	1,009	992

Workforce by nationality of total workforce (%)	2023	2024
Spain	59.94%	59.83%
Mexico	9.54%	9.20%

Australia	5.66%	6.74%
United States	5.98%	5.66%
Chile	4.98%	4.16%
India	1.67%	1.84%
France	1.61%	1.79%
South Africa	1.90%	1.75%
Portugal	1.07%	1.22%
Italy	1.00 %	0.97%
Other	6.64%	6.83%

Percentage of executive and managerial positions, by nationality, out of total executive and managerial positions (%)*	2023	2024
Spanish	59.94%	66.92%
Australian	5.66%	5.44%
Mexican	9.54%	5.30%
Chilean	4.98%	4.30%
United Kingdom	0.25%	3.44%
South African	1.90%	1.87%
Italian	1.00%	1.86%
Portuguese	1.07%	1.72%
French	1.61%	1.57%
Polish	0.67%	1.00%
India	1.67%	1.00%
Other	11.71%	5.58%

DIVERSITY

Note. The calculation methodology may use values with decimals that will later be rounded off.

Gender diversity indicators	2023	2024
% Female employees vs. total workforce	25.29%	25.95%
% Women in executive and management positions vs. total executive and management positions	27.8%	27.2%
Female executives	20.41%	21.28%
Managers	28.16%	27.72%
% Female junior managers out of total junior managers	29.96%	29.55%
% Female executives and managers in business-generating positions (Areas of production and business development)	20.99%	20.61%
% STEM women vs. total STEM staff	25.28%	25.26%
% of women in technical jobs vs. total staff in technical jobs	33.64%	34.03%
% women vs. total qualified employees	31.6%	31.80%
% women out of total promotions	33%	38.37%
% women in new hires	30.94%	30.54%

TYPES OF CONTRACT

Note. The calculation methodology may use values with decimals that will later be rounded off.

Type of temporary contracts includes the category of contracts with non-guaranteed hours specified in the table: Employees by type of contract and gender in section S1-6.

Workforce by age range and type of contract (%)				
	2023		2024	
Age range	Permanent	Temporary	Permanent	Temporary
<31	92.65%	7.35%	88.50%	11.50 %
31-50	97.84%	2.16%	98.67 %	1.33 %
>50	96.38%	3.62%	96.46 %	3.54 %

Workforce by professional category and type of contract (%)		
	2023	2024

Professional category	Permanent	Temporary	Permanent	Temporary
Executives and managers	99.53%	0.47%	99.86 %	0.14 %
Technical staff	98.85%	1.15%	93.11 %	6.89 %
Support staff	95.10%	4.90%	96.32 %	3.68 %
Operators	99.39%	0.61%	99.51 %	0.49 %

Workforce by gender and type of working day (FTE)				
	2023		2024	
Gender	Full-time	Part-time	Full-time	Part-time
Women	760	23	818	18
Men	2,308	7	2,381	7

Workforce by age range and type of working day (FTE)				
	2023		2024	
Age range	Full-time	Part-time	Full-time	Part-time
<31	548	10	538	5
31-50	2,149	15	2,215	14
>50	372	5	446	6

Workforce by professional category and type of working day (FTE)				
	2023		2024	
Professional category	Full-time	Part-time	Full-time	Part-time
Executives and managers	631	3	683	4
Technical staff	1,318	15	1,401	13
Support staff	117	6	127	5
Operators	1,003	6	988	4

DISMISSALS

Note: data as at 31/12/2024 for active personnel. Three categories of dismissals are considered for Spain (Dismissals on objective grounds, disciplinary grounds and collective layoffs). For the rest of the world, involuntary resignations, contract terminations and repatriations or deconsolidation are excluded. The calculation methodology may use values with decimals that will later be rounded off.

Note. The calculation methodology may use values with decimals that will later be rounded off.

	Dismissals by gender (no. of persons)	
Gender	2023	2024
Men	34	108
Women	16	19

	Layoffs by age range (no. of persons)	
Age range	2023	2024
<31	13	39
31-50	29	67
>50	8	21

	Dismissals by professional category (no. of persons)	
Professional category	2023	2024
Executives and managers	9	15
Technical staff	23	34
Support staff	2	10
Operators	16	68

NEW HIRES

Note. The calculation methodology may use values with decimals that will later be rounded off.

	New hires by gender (no. of persons)	
Gender	2023	2024
Men	364	232
Women	163	102

	New hires by age range (no. of persons)	
Age range	2023	2024
<31	232	125
31-50	265	180
>50	30	29



	New hires by professional category (no. of persons)	
Professional category	2023	2024
Executives and managers	65	47
Technical staff	322	179
Support staff	20	7
Operators	120	61

	New hires by professional category (no. of persons)	
Country	2023	2024
Australia	97	97
Spain	162	74
United States	92	61
Mexico	65	36
Chile	31	16
South Africa	13	14
India	6	13
Portugal	5	7
Other	56	16

MOBILITY AND TURNOVER

Note. The calculation methodology may use values with decimals that will later be rounded off.

	Turnover breakdown	
Country	2023	2024
Turnover among men (%)	7.26%	5.60%
Turnover among women (%)	10.07%	5.14%
Turnover of people under 31 (%)	14.22%	10.07%
Turnover of people aged 31-50 (%)	6.90%	4.73%
Turnover of people over 50 (%)	6.54%	3.76%
Voluntary turnover* (%)	7.99%	5.48%
Total number of employees who have left the company during the reported period	253	183

Average hiring cost per employee	€2,323	€2,400
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* Voluntary turnover = no. of voluntary departures of employees with indefinite contract / employees with indefinite contract. Since January 2021, we have been using data managed through Workday, which allows us to incorporate a broader type of movements in people joining/leaving the company that provide a more accurate picture of employee turnover in the company. A new methodology has been developed to calculate the average cost of contracting, which includes the complete flow of the on-boarding process.

	Internal mobility	
	2023	2024
No. of vacancies filled by internal candidates	28.65% (548)	32.66% (447)



REMUNERATION

Note: professionals with annual earnings of less than €3,000 who could not be annualised are not included in the statistical analysis. This does not include people having a business relationship with the company. Only the theoretical salary (fixed + variable target) has been taken into consideration for the analysis, therefore share awards are not considered.

Note. The calculation methodology may use values with decimals that will later be rounded off.

		Workforce by age range and type of contract (%)					
Production and business development areas		2023			2024		
Gender	Professional category	< 31	31-50	> 50	< 31	31-50	> 50
Men	Executives and Managers	78,728	99,155	130,118	78,720	102,782	135,967
	Technical and Qualified Staff	47,691	55,654	64,759	52,336	62,238	78,858
	Other personnel	27,773	30,682	34,122	32,264	35,129	38,589
Women	Executives and Managers	52,900	89,636	138,964	63,358	82,649	128,352
	Technical and Qualified Staff	42,616	50,657	56,684	46,853	54,509	67,031
	Other personnel	19,422	30,741	35,020	24,060	33,938	38,632
Support areas		2023			2024		
Gender	Professional category	< 31	31-50	> 50	< 31	31-50	> 50
Men	Executives and Managers	55,900	95,538	116,682		97,778	132,170

Women	Technical and Qualified Staff	44,243	44,637	80,160	42,815	54,411	81,200
	Other personnel		16,688			17,486	
	Executives and Managers	91,081	87,973	105,872	62,963	100,656	131,986
	Technical and Qualified Staff	40,094	48,028	51,609	37,227	52,499	60,058
	Other personnel		30,689			28,361	

The average total remuneration for executives who were not executive directors was in 2024 €171,000 for men (156,000 in 2023) and €165,000 for women (159,000 in 2023).

	ACCIONA Energía Bonus in figures	
	2023	2024
No. of employees benefitted	2,130	2,392
% of executives of total number of employees benefitted	2.7%	1.9%
% of managers, technical and support staff of total number of employees benefitted	72.1%	69.2%
No. of countries where the Bonus is applied	21	19

ABSENTISM

Note. The calculation methodology may use values with decimals that will later be rounded off.

The number of accumulated absence hours in 2024 was 244,936 compared to 208,888 in 2023.

	Absenteeism rate (no. of days lost due to absenteeism/no. of days worked) x 100	
	2023	2024
No. of employees benefitted	3.48	3.92

TRAINING

Note. The calculation methodology may use values with decimals that will later be rounded off.

	Training hours	
	2023	2024
Executives and managers	32,770	31,874
Technical staff	56,341	63,395
Support staff	2,352	3,249
Operators	35,118	47,940

Investment in training (EUROS)				
	2023		2024	
Professional category	Total investment	Investment per employee/year	Total investment	Investment per employee/year
Executives and managers	1,617,422	2,551	1,450,892	2,111
Technical staff	1,930,231	1,448	2,132,074	1,509
Support staff	92,408	753	116,541	884
Operators	1,208,152	1,198	1,419,185	1,430

SKILLS DEVELOPMENT

Note. The calculation methodology may use values with decimals that will later be rounded off.

	Employees who participated in the performance status process by gender and professional category (number)					
	2023			2024		
Professional category	Men	Women	Total	Men	Women	Total
Executives and managers	468	169	637	489	183	672
Technical staff	835	430	1,265	846	466	1,312
Support staff	10	106	116	13	101	114
Operators	908	56	964	867	50	917

HEALTH AND SAFETY

Note. The calculation methodology may use values with decimals that will later be rounded off.

	Work-related mileage and commuting accidents, with and without lost time, among own employees	
	2023	2024
Commuting accidents	5	9
Work-related mileage accidents	3	1

	Work-related mileage accidents, with and without lost time, own employees	
	2023	2024
Work-related mileage accidents	3	2

	ISO 45001 Certification	
	2023	2024
ISO 45001 Certification (%)	100	100

	Training in occupational risk prevention at the corporate university	
	2023	2024
Number of hours	33,069	47,092



S2 WORKERS IN THE VALUE CHAIN

Strategy

Impact, risk and opportunity management

Metrics and targets



S2 Workers in the Value Chain

DISCLOSURE REQUIREMENTS

STRATEGY

[S2-SBM-2] INTERESTS AND VIEWS OF STAKEHOLDERS

[S2-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S2-1] POLICIES RELATED TO VALUE CHAIN WORKERS.

[S2-2] PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS.

[S2-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

[S2-4] TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS

METRICS AND TARGETS

[S2-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

STRATEGY

[S2-SBM-2] Interests and views of stakeholders

ACCIONA Energía recognises that workers in the value chain are a key stakeholder whose rights, activities, interests and views have a direct impact on the management of risks and opportunities, on the sustainability of its business and its reputation. ACCIONA's Sustainability Master Plan (SMP) integrates the interests, views and rights of these workers into its strategy and business model:

Dialogue and collaboration: The company maintains open and transparent dialogue with its value chain through different channels, which is key to identifying risks and opportunities for improvement.

Integration in the supply chain: ACCIONA Energía has policies and procedures in place to ensure that its suppliers and contractors respect human rights and international labour standards, conducting regular audits of higher-risk suppliers to verify compliance with these standards and requiring its first-tier suppliers to do the same.

Training and skills development: ACCIONA Energía provides training to its suppliers and contractors on human rights and international labour standards, with the aim of fostering a culture of respect and compliance throughout the value chain.

Whistleblowing mechanisms: The company has confidential mechanisms in place for workers in the value chain to report any breaches of human rights or labour standards. These complaints are thoroughly investigated and corrective action is taken.

Remediation: If non-compliance is identified, ACCIONA Energía works with its suppliers and contractors to implement action plans to remedy the situation and prevent it from recurring in the future.

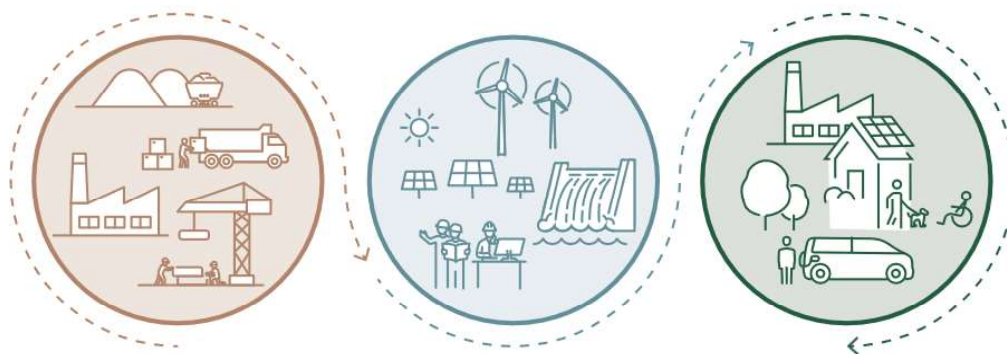
For more information on the process of considering the interests and views of Suppliers and Contractors, see section **G1-2 Sustainable Supply Chain** of this Sustainability Report.

[S2-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

The general process used to identify impacts, risks and opportunities is described in detail in “Annex 1 2024 Dual Materiality Analysis Process, definitions and results by business”, section “[IRO-1] Description of the process to identify and assess material impacts, risks and opportunities”.

ACCIONA Energía, in its ESG risk and impact assessment process, integrates the materiality analysis and additional analysis processes to assess potential impacts and dependencies using a series of metrics that are evaluated in all its facilities and projects globally, covering more than 300 sites where the company operates.

The process carried out yielded the following results:

Impacts, risks and opportunities identified

Sub-topic	Upstream Value Chain	Own Operations	Value Chain: Downstream
Working conditions	<i>NI - Potential impact on human and workers' rights of workers of upstream value chain suppliers and contractors</i> <i>PI - Extension of labour standards to contractors, promoting similar standards throughout the supply chain</i> <i>R - Litigation or reputational damage as a result of the above</i>		
Equal treatment and opportunities for all	<i>NI - Potential discrimination against workers of upstream value chain suppliers and contractors</i> <i>R - Reputational damage as a result of the above</i>		
Other workers' rights	<i>NI - Other potential violations in value chain workers</i> <i>R - Reputational damage as a result of the above</i>		

Caption:

NI - Negative impacts

PI - Positive impacts

R - Risks

O - Opportunities

A total of 7 issues have been identified, all of which are considered relevant. Below is an aggregation by topic and type of relevant impact, risk and opportunity identified in the process.

Negative impacts

They fall into two categories:

- Violation of workers' rights: related primarily to labour practices applied by upstream suppliers in the company's value chain.
- Human rights violations: primarily related to human rights protection practices applied by upstream suppliers in the company's value chain.

Potential impacts in this regard could occur in the value chain, at higher levels of the chain beyond the control of the company and its direct suppliers. Risks of forced labour are identified in certain regions of China, as well as risks of child labour and other workers' and human rights violations in the extraction of minerals needed for the energy transition.

Section [S2-4] "Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions" and G1-2 "Management of relationships with suppliers" detail the due diligence process used by the company to manage these potential impacts.

Positive impacts

- Extension of the company's requirements to the value chain: considers the extension of health and safety principles throughout the value chain (contractors in the company's own facilities and suppliers) by applying high standards and requirements in this regard.

Risks

- Reputational damage and litigation: related to a possible operational and/or reputational impact due to potential practices contrary to existing workers' rights, respect for diversity and respect for Human Rights by suppliers and contractors.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S2-1] Policies relating to value chain workers

The company's policies for managing its material impacts, risks and opportunities related to employees in the value chain coincide with those already set out in relation to its own employees and can be found in more detail in chapter S1. The scope of application to workers in the value chain is specified in each policy as follows:

Code of Conduct: "ACCIONA Energía [...] will promote the adoption of principles and values similar to those of this Code... among its third parties. ACCIONA understands that the application of the principle of due diligence in ethics and compliance implies the obligation to verify that its third parties have ethics and compliance models in place, and to mitigate the associated risks in their relationships with third parties".

Ethics Channel: "[...] available so that any person can report breaches (or risks of breaches) of the applicable legal regulations or the Code of Conduct occurring within the framework of ACCIONA Energía's activities [...]".

Human Resources and Occupational Risk Prevention Policy: "The prevention of occupational risks is a differentiating component and essential requirement for ACCIONA Energía to ensure the health and safety of employees and collaborators". "ACCIONA Energía promotes and disseminates its Prevention Management System in its own activities, as well as those of its collaborating companies, in order to achieve the goal of zero accidents. ACCIONA Energía also provides its employees and its collaborating companies with the necessary training, skills development and material resources on occupational risk prevention [...]"

Diversity, Equity and Inclusion Policy: “This policy applies to the business activity of ACCIONA Energía, as well as to all its business relationships, promoting that its business partners, including its suppliers, contractors, customers and associates, apply these principles of diversity and inclusion”.

Human Rights Policy: “ACCIONA Energía supports, respects, and contributes to the protection of internationally recognised fundamental human rights, making sure not to be complicit in any form of abuse or violation of those rights with regard to workers, suppliers, contractors, collaborators, partners, competitors, customers, local communities and society at large.”

Stakeholder Relations Policy: “The company's key stakeholders include employees, customers, local communities, partners, suppliers and subcontractors, government and regulatory bodies, investors and analysts, and the media”.

In addition, ACCIONA Energía's **Ethical Principles for Suppliers, Contractors and Collaborators** constitute a fundamental guide to ensure that all parties involved in the company's supply chain carry out their activities in accordance with the guidelines for conduct described in the company's Code of Conduct and Policy Book. These principles are included as a mandatory clause in all orders, contracts and tender specifications and are based on the following pillars:

1. **Transparency and Ethics:** ACCIONA Energía promotes honesty, transparency and trust in all its business relationships. Suppliers, contractors and employees are expected to adhere to these values and to act with integrity in all their activities.
2. **Regulatory Compliance:** ACCIONA Energía requires compliance with all applicable laws and regulations, especially in matters related to ethics and integrity. This includes the fight against fraud and corruption. Particular requirements:
 - a. Legal compliance
 - b. Compliance with international ethical and transparency standards
 - c. Acting with integrity and transparency
 - d. Respect for confidentiality
 - e. Ensuring the protection of personal data
 - f. Rejection of corruption and bribery
3. **Human and Social Rights:** The company undertakes to respect and promote human and social rights. This includes the implementation of policies that ensure fair and safe working conditions, as well as non-discrimination and equal opportunities. Particular requirements:
 - a. Respect for human rights as defined in the internationally recognised standards.
 - b. Non-discrimination.
 - c. Prohibition of forced labour.
 - d. Prohibition of child labour.
 - e. Respect for freedom of association, unionisation and collective bargaining.
 - f. Fair labour practices.
 - g. Adequate working conditions.
 - h. Compliance with working hours.
 - i. Promotion of diversity and inclusion.
 - j. Respect for the communities in which it operates.
 - k. Respect for the conditions of migrant workers.
 - l. Provide its workforce with a safe and healthy workplace with adequate facilities and conditions.

- m. Have preventive measures in place to avoid risks at work, and responses to emergency situations.
 - n. Train its workforce to be aware of these measures and to apply them, ensuring their safety and the safety of others.
4. **Sustainability and Environment:** The company seeks to minimise its environmental footprint and promote sustainable practices. Suppliers, contractors and employees must align themselves with these objectives and contribute to environmental protection. Particular requirements:
- a. Have an effective environmental policy and comply with environmental legislation
 - b. Maintain a precautionary approach and encourage initiatives that promote greater environmental responsibility
 - c. Design production processes that make efficient use of available resources and that prevent or minimise environmental impact
 - d. Encourage the development and dissemination of environmentally friendly technologies
 - e. Provide effective systems for the identification, monitoring and treatment of major environmental impacts
 - f. In the event of environmental damage, use all necessary means to restore the previous situation
5. **Objective Selection:** ACCIONA Energía selects its suppliers, contractors and collaborators based on criteria of objectivity, impartiality and non-discrimination, promoting competition and avoiding any conflict of interest.

The Ethical Principles for Suppliers, Contractors and Collaborators include specific principles of conduct related to internationally recognised international human rights standards, such as the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights and the core conventions referred to in the International Labour Organization (ILO) Declaration. Likewise, ACCIONA, through its adherence to the Global Compact, transfers its commitment to the 10 principles to its Suppliers, Contractors and Partners.

[S2-2] Processes for engaging with value chain workers about impacts.

The company recognises that the perspectives of value chain workers are important to its decisions and activities to manage such impacts. At any stage of the collaboration and on an ongoing basis, all suppliers have two-way channels of collaboration through which to raise questions about their business relationship with ACCIONA Energía.

Similarly, any worker in the value chain can make direct use of the Ethics Channel available in different languages to inform the company of any malpractices detected and encourage their analysis and remediation where appropriate (including those related to workers who may be particularly vulnerable to impacts or marginalised).

In this regard, the company has a standardised process for assessing the performance of suppliers and contractors, in which the supplier's performance in terms of compliance with company policies

(including human and workers' rights) and occupational risk prevention (occupational health and safety) are part of the criteria to be considered and determine the possibility or impossibility of continuing to contract with the supplier.

In the case of the health and safety performance of contractors during the execution of the construction project, a monthly performance analysis is conducted and at least at the end of the project, a "lessons learned" meeting is held with the contractor to be taken into account in future contracts. Furthermore, if the contractor's performance is considered insufficient, the contractor must submit an improvement plan, which must be approved by the company and proven to be effective, in order to be included in future bidding projects.

In the event of potential breaches of the company's human rights and workers' rights policies, "No-Go policies" are applied, whereby the supplier or contractor will enter into a suspension of contracting situation until the supplier or contractor is no longer in this category. To move out of this category, an audit, action and/or improvement plans, or Enhanced Due Diligence process, must be carried out in which the issues that led to the supplier's inclusion in this category and the actions and verification processes required to move out of this category are discussed with the supplier.

This collaborative process is described in more detail in section S2-4.

The highest level function within the company, operationally responsible for ensuring incident collaboration, ultimately rests with the company's Steering Committee.

Likewise, a "Five Minutes of Safety" or "Safety Contact" programme must be in place on all construction sites, to be implemented at the start of the working day and whose main function is the exchange of information between project management and own and subcontracted workers before the start of the working day, in order to detect and correct dangerous conditions or unsafe acts and to serve as an instrument for improving health and safety.

ACCIONA Energía also has mechanisms in place to minimise the risk of non-compliance in relation to respect for the human rights of suppliers' workers. For more information on the process for engaging with workers in the value chain on impacts, see section G1-2 Sustainable Supply Chain of this Sustainability Report.

[S2-3] Processes to remediate negative impacts and channels for value chain workers to raise concerns

ACCIONA Energía has several processes and channels in place to provide remediation or cooperate in the remediation of negative impacts affecting workers in its value chain.

ACCIONA Energía follows an approach based on respect for human rights and business ethics. The company undertakes to provide remediation when it has caused or exacerbated a significant negative impact on workers in its value chain. This commitment is reflected in its Code of Conduct and Human Rights Policy. The processes include the identification and assessment of impacts, the implementation of preventive measures and the creation of mechanisms to remediate impacts already caused.

ACCIONA Energía also has specific channels (global and specific, including at project level) for workers in its value chain to raise their concerns or needs through which it manages and provides remediation for, as the case may be, complaints and grievances, in a fair and transparent manner.

Regarding potential breaches of workers' rights and/or human rights, the company has a Ethics Channel, an internal information system designed so that workers in the value chain can report any wrongdoing, non-compliance or behaviour contrary to the legal framework in force, the Code of Conduct and/or the company's ethical values. The company has clear policies in place to protect individuals who make good faith communications from retaliation. Details of the functioning of the Ethics Channel, as well as the measures applied by the company to ensure the adequate analysis and instruction of all communications received, as well as the guarantees offered to whistleblowers of good faith, are set out in section [G1-1] Business conduct and corporate culture policies.

Regarding possible impacts related to occupational hazards, the communication channels are defined by the procedures of the organisation's Management System, certified in accordance with the ISO 45001 standard, in which the means for making these communications are identified for each case. In this regard, the Main Contractor is obliged to implement on site a programme for the identification and reporting of Unsafe Conditions and Unsafe Behaviour. The programme encourages reporting by anyone on site who detects unsafe conditions and/or behaviour. The site Health and Safety Coordinator will have access to the file or database where all identified Unsafe Conditions and Unsafe Behaviours are being reported and managed.

Regarding possible impacts related to the business relationship established with ACCIONA Energía, suppliers have access to specific supplier mailboxes, as well as to the company's supplier portal. The standards established by ACCIONA Energía's policies are available on the supplier portal, as well as various courses and training courses aimed at aligning their performance with the behaviour expected from and contractually committed to ACCIONA Energía.

The availability of these channels is communicated by means of the contractual formalisation established with ACCIONA Energía and/or is freely accessible in any case on the company's website.

[S2-4] Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

The company carries out a wide range of actions aimed at managing the various material issues relating to workers in the organisation's upstream value chain (suppliers and contractors).

ACCIONA Energía integrates a human rights due diligence strategy into its management systems, which includes: incorporating the principles of conduct and ethical guidelines for suppliers into policies, mechanisms for detecting actual or potential adverse effects, preventing and mitigating potential adverse effects, and remediating actual adverse effects.

The company's approach to managing this issue is integrated into its supply chain management system, through the preparation of a supplier risk map and the collection of information throughout the entire lifecycle of the relationship with the supplier. The whole process is described in detail in section G1-2 Sustainable Supply Chain of this Sustainability Report.

Below are some of the due diligence processes applied to assess and manage negative impacts, enhance positive impacts, mitigate risks and take advantage of material opportunities in relation to suppliers' and subcontractors' workers' rights.

In this regard, given the importance of worker management in the value chain in the engineering and construction phase, specific procedures have been developed to ensure that the management of contractors and subcontractors is carried out in accordance with the expected health and safety standards (Contractor Health and Safety Management Guide), and that contractors and potential subcontractors have adequate health and safety conditions for carrying out work (Annex on basic health and safety conditions for the main contractor).

The process of analysing and managing these risks covers the entire life cycle of the relationship with the supplier:

Before deciding to contract with the supplier/contractor:

- A. Registration and administrative approval
- B. Technical rating (depending on the type of product/service) - This rating covers quality, environmental and occupational risk prevention aspects.

Once the relationship with the supplier/contractor has begun:

- C. Coordination of work with the contractor - This coordination includes technical coordination and coordination of activities with occupational hazards. It also includes ensuring that subcontractors comply with current labour legislation: up-to-date Social Security payments (or equivalent international mechanisms), medical fitness, current contract, adequate training and skills, availability of protective equipment and information and training on risk situations and procedures, among others.

Before, during and after contracting with the supplier/contractor:

- D. No-Go Policies - Management and resolution of non-conformities, including any violation of workers' rights or non-compliance with processes defined by the company. If these non-conformities are not resolved and involve serious violations, the supplier cannot be re-hired by the company until the situation that led it to this status is rectified.

Any supplier wishing to work for ACCIONA Energía must follow this procedure:

A. REGISTRATION AND ADMINISTRATIVE APPROVAL PROCESS

It comprises the following actions or measures:

A1. Responsible Suppliers Declaration

100% of suppliers accept in GoSupply (supplier management platform), the Group's Statement of Compliance. This document, which is described in section [S2-1] Policies related to value chain workers, includes the recommendation to adhere to the United Nations Global Compact, and makes explicit reference to suppliers' recognition of ACCIONA Energía's Code of Conduct and the Ethical Principles for Suppliers, Contractors and Collaborators of ACCIONA Energía, which includes the aforementioned aspects related to Human Rights and Occupational Health and Safety.

A2. Supplier risk map (scores applicable to the supplier)

The Risk Map is ACCIONA Energía's tool to identify, appraise and manage risks in its supply chain. Immediately after an ACCIONA supplier registers with GoSupply, the supplier's risk is calculated based on the result obtained (score) when assessing a number of factors. Among them:

- An ESG score: which includes an analysis (via questionnaire) specific to social issues, which analyses compliance with International Standards on Fundamental Rights at Work, quality of employment, relationship with local communities and possible sanctions in these matters.
- An Operational score: which analyses (via questionnaire) issues related to health and safety and accident data of the supplier.

- A Geopolitical score: which analyses (based on various indices extracted from Maplecroft and GoSupply) the country risk in terms of human rights, labour conditions or socio-economic level.

The outcome of pre-segmentation is known prior to contracting and is verified in the approval and on-site audit processes.

A3. Supplier approval

In addition, strategic suppliers (awarded more than €400,000 accumulated in the last twelve months) require approval, which involves a more exhaustive analysis of all scores. Among other things, compliance with international human rights standards is checked in greater detail. Minimum score requirements are established in order to proceed with this approval, with a minimum of 40 points for ESG risks and a maximum of Medium risk for Geopolitical risk.

A4. ESG audits

The next level of supply chain monitoring is ESG audits. On-site audits of ESG aspects are carried out for strategic suppliers (procurement over €400,000) in risk countries as well as for suppliers with an annual procurement amount of more than €500,000 regardless of the supplier's country of location.

Monitoring audits of strategic suppliers have been carried out since 2013. In 2024, 171 were conducted, 155 of them on direct strategic suppliers, that may pose a risk to the business or simply because they are a strategic supplier in a risk country (China or India).

The audits carried out under the aforementioned assumptions follow ACCIONA Energía's own protocol focused exclusively on ESG aspects. In social matters, it includes content such as community relations, the working environment, compliance with human rights, improvement of business processes and occupational health and safety. The audit protocol includes specific questions on the traceability of specific materials that pose a higher risk.

ESG audits generate a series of findings that allow both the supplier and ACCIONA Energía to assess the company's situation and work together on areas for improvement. ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. If the serious deficiencies detected cannot be resolved within a reasonable period of time, the company is marked as No-Go.

Finally, a last supply chain control is established, consisting of tier 2 supplier audit campaigns of equipment suppliers with contracts exceeding €5M. Audits of tier 2 suppliers ensure a more complete understanding of the supply chain and mitigate potential or actual risks. By the end of 2024, 16 audits had been carried out on three tier 2 strategic suppliers of strategic cables and transformers. The countries in which such audits have been carried out are:

Country	No. tier 2 audits	%
China	13	81.25%
Spain	2	12.50%
Germany	1	6.25%

Focusing on the Non-Conformities of the 155 direct suppliers audited in 2024, the following is worth noting:



- 64% of the audited direct suppliers had no Serious Non-Conformities.
- The remaining 36%, which did have Serious Non-Conformities, have followed the various action plans proposed at the end of the audits. Of this percentage, 68% had totally resolved their SNCs at the end of 2024.

As for suppliers from risk countries, both tier 1 and tier 2, 22 suppliers from China and India were audited between 2023 and 2024, with only 4 of them obtaining Serious Non-Conformities.

Regarding the segmentation of Serious Non-Conformities:

- 67% of the SNCs obtained belong to the Social area, mainly related to occupational risk prevention, the need for specific policies to comply with International Standards, non-compliance with the Disability Act or the creation of mechanisms to control working hours.
- 17% of the SNCs obtained are grouped in the area of Environment, mostly related to licensing, waste management and segregation or emission control.
- The remaining 15% of the SNCs relate to the area of Governance, mainly to the need for the development of information protection policies or the lack of an accessible whistleblowing channel.

B. TECHNICAL RATING PROCESS

Suppliers of certain categories of services/supplies considered critical for the company's activity, in addition to passing the registration and administrative approval process described above, require an additional technical rating to determine their suitability for carrying out the specific work or supply. The complete list of supplies of critical goods or services, as well as documentation referring to the technical rating of suppliers are publicly available in the Contractor Profile (<https://contractorprofile.acciona-energia.com>).

To be able to contract with the supplier, it must pass a rating process carried out through GoSupply and overseen by the Quality, Prevention and Environment areas. During this process, suppliers are required to answer a questionnaire divided into three sections: quality (Q), environment (E) and occupational health and safety (S). The supplier will receive a rating from 0 to 4 in each of the sections.

Typical contents of the Health and Safety rating questionnaire:

- Performance: Accident indicators. Frequency rate and severity rate of the supplier.
- OHS management systems and certifications
- OHS policy
- Roles and responsibilities assigned
- Competence, training and awareness
- Risk identification
- Legal requirements
- Objectives and programmes
- Information, communication, participation and consultation
- Operational planning and control
- Subcontractor management
- Emergency preparedness and response
- Monitoring, analysis and evaluation
- System audit
- Incident management
- Non-conformity management

- Good practices, safety and health
- Road safety

This questionnaire requires certificates and evidence to support the answers provided, as well as a signed declaration by the person responsible regarding the veracity of the answers.

In some cases, if the product or service provider is deemed to pose a risk to the project or activity, the Supplier Quality department may carry out an on-site technical audit. At the end of the audit, ACCIONA Energía sends an audit report with comments and observations on possible improvements. The supplier will be requested to define the actions related to these observations and to proactively keep the company informed of progress.

Upon completion of the entire assessment process, a final rating will be awarded. Those with a lower rating (Q0/E0/S0) will be considered unacceptable and cannot be hired, those with a minimum rating (Q1/E1/S1) will be accepted subject to the preparation of an action plan and upping their rating in order to be hired. Those with an intermediate (Q2/E2/S2) to excellent (Q4/E4/S4) rating are considered acceptable and may be hired, although those with an intermediate rating must submit an improvement plan.

C. COORDINATION OF WORK WITH THE CONTRACTOR

All of ACCIONA Energía's activities are certified under the ISO 45001 standard. Under this standard and through compliance with the applicable legislation in each territory in which it operates, the company develops the necessary guidelines and procedures to guarantee health and safety in the workplace for both its own workers and subcontractors. This includes the identification and assessment of risks associated with facilities, activities, work equipment, hazardous substances and particularly dangerous work, among others; the implementation of preventive and corrective measures; training and information, participation and provision of equipment and means of protection to workers; and the promotion of a safety culture involving all levels of the organisation.

The Main Contractor accepts ACCIONA Energía's Health and Safety Policy and undertakes to comply with it from the moment the contract is signed. ACCIONA Energía's Health and Safety Policy is set out in the "Safety Principles" for construction projects, which must be known by all staff working on the project.

The health and safety performance of a Main Contractor in a Project will be regulated by the provisions of the Health and Safety Plan of the Project. ACCIONA Energía has a Health and Safety Coordinator for the project, who, together with the preventive resources available, is responsible for: evaluating and monitoring compliance with the requirements of the plan, informing management of the status, approving updates to the plan if new risks are identified and acting in the event of non-compliance by the contractor to correct the situation.

The contractor undertakes that all well-being, office and first aid facilities to be installed on the project will comply with the requirements of local legislation and be appropriate to the number of workers who will use them and the location and/or dimensions of the project. In particular, the facilities must have: drinking water in sufficient quantity in any area of the project, rest rooms, canteens, toilet areas. All of this under proper maintenance and cleanliness conditions.

In order to provide comprehensive coverage for the development of the project, the coordination of the work between ACCIONA Energía and the contractor consists of different phases:

- Planning and preparation of the work: a series of meetings are held prior to the execution of the service, including a final one at the work site, in order to ensure proper coordination and compliance with the work-related requirements.
- Designation of health and safety functions for a service: prior to the start of the work, both ACCIONA Energía and the contractor determine the contact persons to agree and monitor the work.
- Health and safety documentation exchange with the contractor: to check that the contractor has implemented measures that have a direct impact on preventing incidents, relevant documentation will be requested. They include: Applicable Health and Safety Plan, evidence of training of workers, of having work equipment and personal protective equipment in good condition and complying with regulations, etc.
- Assessment of the risks of the contracted work: prior to the start of the work, the contractor communicates the risks of the service and which may affect both its workers and those of third parties, as well as the safety measures it intends to implement to control these risks: work instructions, use of certain personal protective equipment, signage, etc.
- Contractor's health and safety orientation and training: a programme or tool will be available so that any person outside the workplace will be aware of the existing hazards and the basic safety regulations of this workplace.
- Execution, control and monitoring of the work: The contractor is obliged to execute the work in accordance with the contract, complying with the Basic Health and Safety Conditions supplied by ACCIONA Energía.
- Health and safety inspections: The work will be subject to periodic inspections by ACCIONA Energía, where compliance with the Basic Health and Safety Conditions indicated by ACCIONA Energía will be verified.
- Health and safety audits: The activities are subject to a control process through internal and external audits, where compliance with its Management System is checked.
- Assessment of the contractor's health and safety performance: continuous evaluation is encouraged in order to correct possible deviations. For the supplier assessment, both the qualitative performance of the supplier (compliance with the agreed safety plan, development of the customised programme of safety activities, as well as possible non-compliances or non-conformities) and the quantitative performance (near misses, incidents, frequency rate, severity rate, etc.) are considered.
- Where possible, assessments are accompanied by meetings to identify and agree on ongoing opportunities for improvement.

D. NO-GO POLICIES

Failure to comply with the minimum established in the No-Go Policies means that a supplier may not be contracted until the reasons for being in such a situation have been solved. The Purchasing ERP is parameterised to prevent contracting with suppliers who are in this status.

The No-Go Policies include the following situations:

- Strategic suppliers in at-risk countries that have not been audited, or that have been audited and have one or more unresolved Serious Non-Conformities.
- Demonstrated non-compliance with the United Nations Global Compact.
- Debts with the Social Security Institute.
- Companies penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

At the beginning of 2024, there was a history of 35 No-Go suppliers. During the year, 12 No-Go suppliers exited No-Go status and a total of 15 No-Go suppliers entered No-Go status, ending the year with a total of 38 No-Go suppliers.

Removal from this category is carried out following auditing, action or improvement plans, or Enhanced Due Diligence. The latter consists of an investigation into any adverse impacts detected, communication with the supplier to confirm the information, and verification of the resolution of the conflict prior to entering into any new contract.

In this regard, it should be noted that, during 2024, 11 suppliers that had entered No Go status for not closing their Serious Nonconformities on time, have managed to revert their status through the implementation of different plans and actions aimed at their resolution.

METRICS AND TARGETS

[S2-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The company has various objectives relating to the material issues highlighted in relation to workers in the supply chain, developed and overseen by the Purchasing and Occupational Risk Prevention Divisions, which fall within the scope of the intentions and principles defined in the policies highlighted in section S2-1:

Rights of workers in the organisation's upstream value chain (suppliers and subcontractors)

ACCIONA has several objectives related to the management of negative impacts in the value chain. These objectives arise from the company's Sustainability Master Plan 2025, approved at Board level, and are applicable until the end of the plan's period of validity in 2025. The supervisory body for the 2025 SMP is the Audit and Sustainability Committee:

An objective of 0 purchases from suppliers classified as No Go.

This objective, aligned with ACCIONA Energía's policies on Social Safeguards, involves not contracting any suppliers who have any type of non-compliance (as set out in ACCIONA Energía's No Go Policies) and have not resolved it.

The criteria for classification as a No Go supplier, the actions required to no longer be considered as such and the details of the current situation with respect to ACCIONA Energía's supplier base are outlined in section G1-2 Sustainable Supply Chain.

The objective of conducting ESG audits of tier 2 suppliers in all equipment supply contracts (tier 1) for an amount above €5M, overseeing tier 2 suppliers that make up at least 80% of the contracted supply amount.

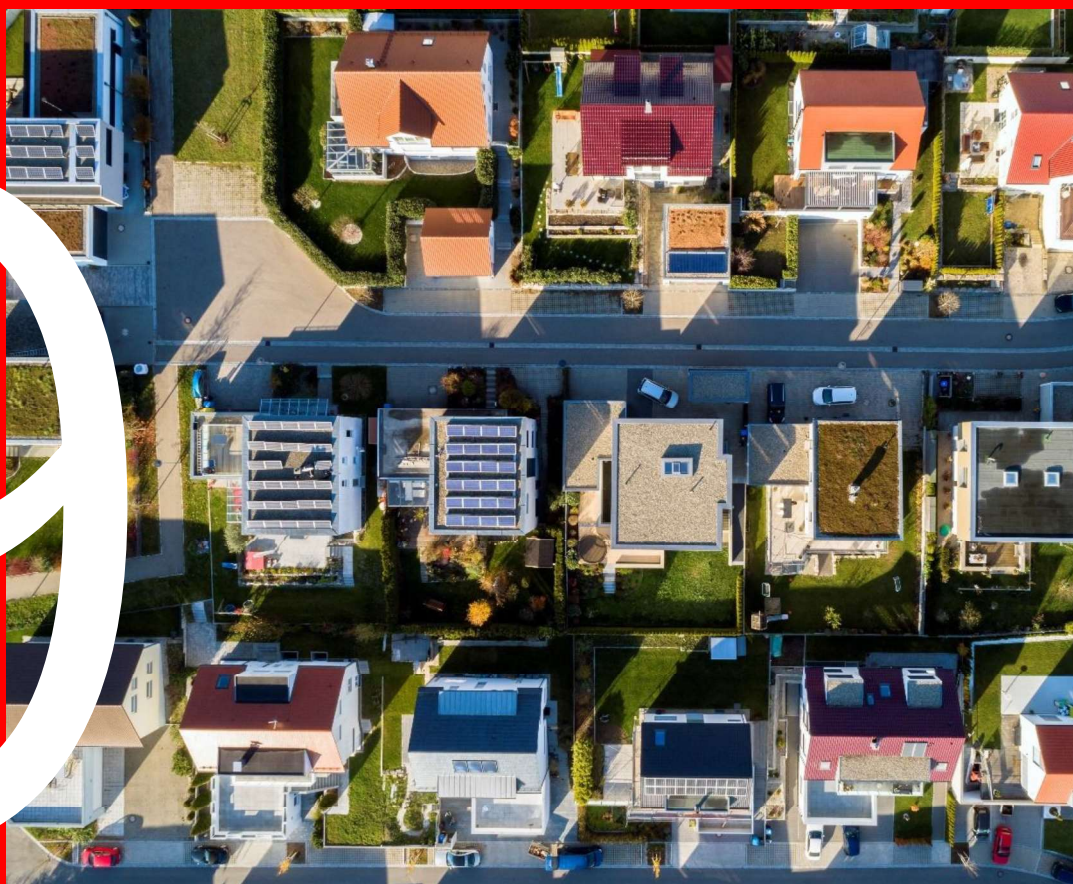
These campaigns were started in 2018 and have been increasing annually, with the number of suppliers increasing year on year. It is seen as an effective way of extending the company's due diligence beyond the tier 1 supplier with which it has a contractual relationship.

Safety and health of workers in the upstream value chain (contractors)

ACCIONA Energía's objective is to reduce the number of workplace accidents, aiming for an ideal goal of zero accidents in the workplace. There is also an objective, linked to the variable remuneration of employees (ACCIONA Energía Bonus), to improve the accident frequency rate ratio (which includes both own employees and contractors).

In 2024, the accident frequency rate for external employees was 2.02 and the number of fatal accidents in this group was 3 (vs. 2.25 and 0 respectively in 2023).

9



S3 AFFECTED COMMUNITIES

Strategy

Impact, risk and opportunity management

Metrics and targets



S3 Affected Communities

DISCLOSURE REQUIREMENTS

STRATEGY

[SMB-2] INTERESTS AND VIEWS OF THE AFFECTED COMMUNITIES

[SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S3-1] POLICIES RELATED TO AFFECTED COMMUNITIES

[S3-2] PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

[S3-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS

[S3-4] TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS

METRICS AND TARGETS

[S3-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

STRATEGY

[SMB-2] INTERESTS AND VIEWS OF THE AFFECTED COMMUNITIES

ACCIONA Energía recognises that the communities in the area of influence of its projects and services, especially the most vulnerable groups, may be affected by its activities. In a global context marked by challenges such as inequality and climate change, the company takes responsibility for minimising negative impacts and enhancing the positive effects of its activities. This commitment, integrated into the company's strategy and sustainable business model, strengthens its vision of acting as an agent of change, promoting social and environmental well-being in the territories where it operates.

For more than a decade, ACCIONA has developed and perfected its own Social Impact Management (SIM) methodology, aligned with the most demanding international standards, and included in the Corporate Standard on Social Impact Management of Projects. This standard applies to all communities located within the area of influence of the projects, operations and services defined within its scope, ensuring a systematic and standardised approach to managing social impacts in any geographical context where the company operates.

COUNTRIES IN WHICH THE SIM METHODOLOGY IS BEING APPLIED

ACCIONA Energía's SIM methodology has a global reach, having been applied, as in the previous year, in 18 countries on five continents. This distribution reflects the organisation's ability to integrate and adapt social criteria in its projects consistently and effectively across diverse cultural, social, and geographical contexts.

Geographical area	Countries
Africa	South Africa
Asia	India
Europe	Spain
	Italy
	Portugal
	Croatia
	Poland
	Ukraine
North America	Mexico
	Canada
	United States
South America	Brazil
	Chile
	Peru
	Colombia
	Costa Rica
	Dominican Republic
Oceania	Australia



The correct implementation of the SIM methodology allows the identification, evaluation, analysis and management of the social consequences, whether intended or unintended, both negative and positive, derived from the company's activities, fostering constant and participatory dialogue with local communities. Through this comprehensive approach, it ensures that the interests and views of affected communities are integrated into decision-making, ensuring that the actions implemented meet their actual needs and help build a fairer and more sustainable future.

The SIM methodology is structured in different interconnected stages which, together, ensure efficient social management, adapted to each project and community:

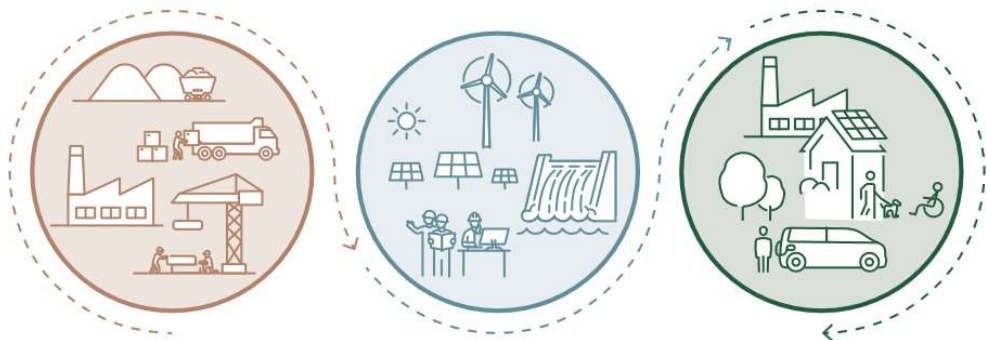
- **Social risk characterisation and budget allocation:** the potential social risks associated with the project and the communities are studied from the development phase. This characterisation makes it possible to identify and analyse potential social risks and to propose measures to prevent them from materialising. Depending on the resulting risk level, a budget item is allocated for the future management of the social impact of the project and the implementation of the necessary social measures.
- **Social assessment of the project:** subsequently, a comprehensive analysis is carried out of the characteristics of the communities in the area of influence, such as their social, economic, demographic, environmental and cultural context; the levels of access to basic services such as education and health; and the existence of conditions that guarantee respect for and protection of human rights, among others, always paying special attention to disadvantaged and/or vulnerable groups. These communities, stakeholders or relevant actors and their community resources are also identified and characterised.
- **Based on this analysis, and using proven tools and methodologies,** both positive and negative social impacts are assessed, characterised and prioritised, considering not only direct effects, but also possible indirect impacts. This approach makes it possible to connect the project with local conditions, by proposing specific measures to enhance the positive impacts and mitigate the negative ones, prioritising those considered of greater relevance or affecting disadvantaged and/or vulnerable groups. These impacts are categorised according to their duration, severity, extent and likelihood. Social measures are designed and agreed internally and externally based on a strategic approach that minimises risks and enhances sustainable development opportunities for local communities.
- **Implementation and monitoring of initiatives:** in this stage, the social initiatives designed together with the community are implemented to maximise the positive impacts and mitigate the negative ones, thus ensuring that they meet the actual needs of the territories where ACCIONA Energía operates. These actions are constantly monitored to evaluate their effectiveness and enable adjustments to optimise results. This additional component ensures that the resources allocated contribute to generating positive, sustainable social impacts and create long-term added value for communities, improving their well-being.
- **Communication and dialogue with communities and other stakeholders:** in a cross-cutting manner, the methodology emphasises the importance of maintaining ongoing and transparent dialogue with local communities and other relevant stakeholders, fostering principles of active listening. This ongoing dialogue not only allows for the establishment of a relationship of trust with the communities, but also for reporting on the main impacts and benefits of the project and gathering stakeholder concerns and suggestions, with the aim of positioning the company as an asset in the search for innovative solutions to address the social reality of the areas of influence of its projects.

[S3-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

Through the dual materiality exercise, details of which can be found in Annex I of this report, ACCIONA Energía has identified and assessed the positive and negative impacts, risks and opportunities affecting different groups related to its activity. Affected groups include those who live or work in the areas where the company operates, as well as more remote communities whose quality of life or access to resources could be influenced by activities in the value chain. The negative impacts identified include both localised impacts derived from specific situations and broader effects associated with social or environmental dynamics in the territories where ACCIONA Energía carries out its projects. Likewise, the transition towards more sustainable models may generate new challenges in certain communities, which ACCIONA Energía addresses through responsible management of its operations. As part of this exercise, the positive impacts on the different groups identified are also analysed, categorising them into localised, systemic, short-term and long-term impacts in order to maximise the social, economic and environmental benefits in the areas where it operates.

A total of 13 issues have been identified, of which 8 have been classified as material due to their potential impact (positive and negative) on the affected communities and the risks that arise for the company as a result of the above.

Impacts, risks and opportunities identified



Sub-topic	Upstream Value Chain	Own Operations	Value Chain: Downstream
Economic, social and cultural rights of groups			NI - Generation or aggravation of social conflicts PI - Socio-economic development and social cohesion
Civil and political rights of groups			R - Operational and reputational risk as a result of poor relationship management with local communities
Rights of indigenous peoples			

Caption:
NI - Negative impacts

PI - Positive impacts

R – Risks

O – Opportunities

The process carried out yielded the following results:

Negative impacts

The impacts identified can be grouped under the following category:

- Generation or aggravation of social conflicts: includes problems arising from the management of the relationship with traditional communities and groups with particular rights, such as minorities or indigenous peoples, as well as the aggravation of social dynamics already existing in local communities. It also covers nuisances generated by construction works, such as noise and light pollution, which can affect coexistence and generate tensions.

Positive impacts

The identified impact corresponds to:

- Socio-economic development and social cohesion: this area includes positive impacts related to the generation of job and livelihood opportunities in the area, and community development.

Risks

The risks identified are grouped into two main categories:

- Operational risk as a result of poor management of the relationship with local communities: conflicts with the community may arise, and there is a risk of project development or implementation delays.
- Reputational risk as a result of poor management of the relationship with local communities: potential conflicts with the community may arise, resulting in loss of trust and the company's social licence to operate in the eyes of stakeholders and local authorities.

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S3-1] POLICIES RELATED TO AFFECTED COMMUNITIES

ACCIONA Energía establishes clear principles and guidelines to ensure that its activities respect the rights and needs of all affected communities. These principles are included in the Policy Book which are approved by the company's governing body as the highest-level entity with powers to do so: the Board of Directors or the Audit and Sustainability Committee as the delegated body with powers in matters of sustainability. These include the Human Rights Policy, the Stakeholder Relations Policy and the Ethics Channel Policy.

Human Rights Policy

ACCIONA Energía's Human Rights Policy, together with its related regulatory system, is aligned with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Declaration. In addition, the organisation contributes to the achievement of the Sustainable Development Goals (SDGs), being a lever for integration in all its practices.

The company, through this policy, ensures the protection of human rights for all its stakeholders, including local communities affected by its activities. It also establishes legitimate and effective mechanisms to remedy any adverse impacts it may cause or contribute to, thereby ensuring the protection of the rights of local communities and fostering relationships based on respect and collaboration.

In line with its commitment to all communities, especially indigenous communities and other vulnerable groups, ACCIONA Energía ensures ongoing dialogue and free, prior and informed consultation (FPIC) in projects that may affect them, in accordance with ILO Convention 169. These consultations are adapted to the cultural and territorial context, respecting their rights and needs, and are designed in collaboration with legitimate representatives and local organisations. This is achieved through a combination of digital media, physical channels, direct communication methods and mass dissemination tools, ensuring inclusive and tailored access to each community. In addition, specific measures are established to protect their culture, lands and resources, as well as to prevent and adequately remedy any adverse impacts.

+ More information: [Annex IV in: Human Rights Policy.](#)

Stakeholder Relations Policy

With the principles of this policy, ACCIONA Energía seeks to add value to the local communities in the geographical areas in which it operates, through the development of business models that contribute to their sustainable development, while at the same time undertaking to prevent and mitigate the economic, social and environmental risks that could affect them through its activities. It maintains regular and free-flowing dialogue with these stakeholders, determining and responding to their needs and expectations and incorporating the most relevant ones into its business strategy.

It also provides suitable and accessible channels for collecting suggestions, needs, expectations, views and complaints, as well as transparent, truthful and rigorous information on the fulfilment of the

commitments undertaken and the results of its business management. The company also undertakes to establish responsibilities and dedicate the necessary resources in order to meet these needs and expectations, implementing monitoring and continuous improvement mechanisms to assess stakeholder satisfaction and incorporate the necessary improvements.

+ More information: [Annex IV in: Stakeholder Relations Policy.](#)

These policies are operationally implemented through the Corporate Standard on Social Impact Management and the Corporate Instruction on Communication and Dialogue with Communities, both of which are part of the company's Social Function (FS). This framework provides tools to mitigate risks, take advantage of opportunities and effectively manage the social impacts of its projects, services and activities.

ACCIONA Energía's policies apply to all of the organisation's assets, regardless of their geographical location. ACCIONA Energía also encourages the adoption of these principles among its suppliers, contractors, collaborators and business associations in which it participates, ensuring that its entire value chain is aligned with its social and ethical commitments.

To manage social risks, impacts and opportunities, ACCIONA Energía has developed its own Social Impact Management (SIM) methodology, based on international standards such as the IFC Performance Standards. This methodology identifies, assesses and manages potential risks and impacts, and maximises opportunities for affected communities. Its main components include the proactive identification of risks in human rights and other social dimensions, the design of specific measures to prevent, mitigate or offset adverse impacts, and the establishment of early and continuous dialogue with affected communities.

In line with its commitment to all communities, especially indigenous communities and other vulnerable groups, ACCIONA Energía guarantees ongoing dialogue and free, prior and informed consultation (FPIC) in projects that may affect them. These consultations are adapted to the cultural and territorial context, respecting their rights and needs, and are designed in collaboration with legitimate representatives and local organisations. This is achieved through a combination of digital media, physical channels, direct communication methods and mass dissemination tools, ensuring inclusive and tailored access to each community. In addition, specific measures are established to protect their culture, lands and resources, as well as to remedy any adverse impacts.

ACCIONA Energía complements this framework with specific monitoring and remediation mechanisms, such as the Ethics Channel, which allows the confidential reporting of any wrongdoing, respecting anonymity and protecting whistleblowers from retaliation. This channel, together with regular social risk assessments and remediation processes aligned with international best practice, reinforces the effectiveness of the actions implemented. In addition, there are project-specific communication channels, such as websites with detailed information, meeting points and briefings, among others.

Ethics Channel Policy

This policy establishes the essential guidelines for the management of ACCIONA Energía's Ethics Channel, which is the official means for reporting possible breaches of regulations or business ethics. Its objective is to ensure compliance with applicable legislation and with the ethical principles reflected in the company's Code of Conduct, as well as to prevent and combat any conduct contrary to regulations or corporate values. The policy regulates the channels of communication, the confidentiality of whistleblowers, the treatment of personal data and the process of investigating complaints, ensuring protection against retaliation.

 **More information:** Ethics Channel Policy

The Policy Book, as well as different procedures and application guides, are publicly available on the corporate website and in the main languages of the countries where ACCIONA Energía operates. Internal training and awareness-raising campaigns are also carried out to ensure the correct implementation of policies and standards.

With this comprehensive framework, ACCIONA Energía reinforces its commitment to sustainability, respect for human rights and the creation of shared value in the territories where it operates, actively contributing to the fulfilment of the Sustainable Development Goals (SDGs).

[S3-2] PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

Given its extensive experience, ACCIONA Energía has been developing and refining structured approaches to ensure effective communication and dialogue processes with the communities affected by its projects, services and activities. This model, based on methodologies adapted to the social and cultural context of each territory, seeks to respect the rights, needs and perspectives of communities, fostering relationships based on mutual respect, transparency and sustainability.

In 2024, these processes were integrated into the Social Function (FS), a strategic model that connects environmental, social and economic sustainability with local development, aligning the company's global objectives with the specific needs of the territories where it operates.

The implementation of the Social Function is governed by a management and governance ecosystem that could be structured in three levels: project social managers, who act locally, adapting initiatives to the context and needs of each community; social sustainability managers, who oversee, coordinate and ensure the alignment of these actions with the company's strategic objectives; and an internal supervisory body that validates the effectiveness and coherence of the model, reinforcing the positive impact and sustainability of operations.

The process of engaging with communities consists of ongoing dialogue established through free, prior and informed consultation, culturally adapted and designed to foster inclusion. These consultations provide access to local perceptions of project impacts, help prioritise mitigation measures according to community priorities, and ensure early and ongoing stakeholder engagement. ACCIONA Energía also guarantees constant monitoring of community concerns in order to adapt and strengthen the measures implemented.

The process of engaging with communities includes the following key steps:

- **Identification and prioritisation:** relevant communities and stakeholders are identified, focusing particularly on the most vulnerable or with a high capacity to influence. This includes marginalised groups, women, girls and indigenous peoples, ensuring their participation from the earliest stages of the project.
- **Selection of relationship alternatives:** depending on the project, relationships can be based on basic communication or more in-depth dialogues, including formal consultations, adapted to the social and cultural context of each community. The type of communication is adapted to the specific needs and constraints of each community, ensuring that all groups can effectively participate in the processes and that their concerns are fully considered.
- **Monitoring and response:** ACCIONA Energía ensures continuous monitoring of relations with affected communities throughout the life of the projects, in line with the strategy and sustainable business model, through the application of the tools available to the Social Function. The effectiveness of the measures adopted is systematically evaluated through communication channels such as project websites, physical onsite mailboxes, surveys and social networks, among others, collecting and analysing the views of the communities to ensure that their concerns are considered, adjust actions and thus maximise positive impact, ensuring effective and sustainable management of the impacts detected.
- **Recording and documentation:** a detailed record is kept of all consultations, including dates, participants, topics discussed, results and adjustments made to projects. These records are kept for a minimum period of five years.

These practices ensure not only the traceability of interactions, but also compliance with legal, contractual or due diligence regulations of financial institutions. The highest level function within the company operationally responsible for ensuring incident collaboration ultimately rests with the company's Steering Committee.

In projects that impact indigenous communities, ACCIONA Energía adopts specific measures to protect their cultural, spiritual and natural property, ensuring that consultations are respectful of their traditions and rights. These consultation processes, which consider cultural particularities such as language, consultation format and social expectations on participation, ensuring adapted and effective communication, include the dissemination of detailed information on project characteristics, also ensuring that communities receive clear information on the positive and negative impacts of the project, as well as proposed mitigation and enhancement measures.

To ensure effective processes and informed collective decisions, consultations are carried out in good time and the background of possible social conflicts in the region that may influence project development is studied. ACCIONA Energía also works closely with representatives, community leaders and relevant organisations in the design of information materials and consultation processes adapted to the needs and cultural contexts of the communities, ensuring full participation and respect for their rights and traditions.

Throughout the life of each project, ACCIONA Energía continually evaluates the effectiveness of these relationships, incorporating the observations and views of the communities in decision-making. This commitment includes regular reporting to communities on progress and adjustments made, as well as the modification of projects or social measures based on consultations. Satisfaction surveys are

conducted during the information and citizen participation meeting points. In this sense, at the FV Ayora I, II and III meeting point, 61 people rated the event, with an average score of 4.92 out of 5. The Tahivilla wind farm repowering meeting point was rated 4.5 out of 5.

Practical examples of this approach include initiatives such as those carried out at the MacIntyre wind farm (Australia), during 2024: the “MacIntyre WF Site tours” consists of a programme of guided tours of the MacIntyre project, with the aim of showing the project to the community and offering transparency and open conversations to provide information about the project and answer any concerns or questions. A total of 34 guided tours took place, involving 838 people.

Where specific relationship processes do not yet exist, ACCIONA Energía undertakes to implement them within a reasonable time frame, ensuring an approach that reflects its commitment to sustainability and social responsibility.

With this model, ACCIONA Energía reinforces its commitment to sustainability and social responsibility, ensuring that its projects generate a lasting positive impact on communities and contribute to sustainable development in the territories where it operates.

[S3-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS

ACCIONA Energía is committed to the responsible management of the social impacts of its activities, ensuring that remediation and communication processes are aligned with the legal and ethical frameworks in each region. This commitment is put into practice through specific tools and processes designed to remediate negative impacts, encourage active listening and address the needs of affected communities.

When ACCIONA Energía identifies that it has caused or contributed to a significant negative impact, it implements remediation or offsetting measures through a participatory, transparent and ethical approach. Among its key tools is the Ethics Channel, managed by the Ethics Channel Committee, which is available both to members of the affected communities and to any stakeholder. This channel allows you to raise concerns, queries or complaints, guaranteeing confidentiality, anonymity and freedom from retaliation. Communications are processed in accordance with the provisions of applicable legislation, as set out in the Ethics Channel Policy. Communications received through the Ethics Channel are handled impartially. Whistleblowers receive acknowledgement of receipt and, where possible, will be provided with a brief explanation of the investigation results within the legally established period.

ACCIONA Energía also complements the Ethics Channel with local channels for direct attention and communication at the operational level, implemented in 100% of its projects. With the common goal of fostering open, transparent and accessible dialogue with communities, these tools seek to build strong relationships with local communities, promoting coexistence, mutual understanding and sustainable positive impact. In 2024, prominent examples of these channels include project-specific websites, toll-free hotlines, newsletters, suggestion boxes, social perception and satisfaction surveys, as well as the establishment of social managers, called Community Liaison Officers in both Australia and South Africa, and the implementation of territory roundtables with key stakeholders to address issues of community interest. These initiatives offer communities the opportunity to obtain clear and timely information about the company's projects, operations and services, raise their concerns, submit suggestions or

complaints, and participate in collaborative processes designed to generate shared value and sustainable solutions.

The company regularly evaluates the effectiveness of these channels through community surveys, as well as detailed tracking and recording of queries and complaints, including dates, issues addressed and results achieved. Furthermore, in line with the provisions of ESRS G1-1, ACCIONA Energía adopts specific policies that protect users of these channels against retaliation, fostering an environment of trust and active participation.

ACCIONA Energía pays special attention to the most vulnerable groups, including indigenous communities, adapting its remediation and dialogue processes to their cultural, spiritual and territorial needs. These methodologies respect international legal frameworks and best practices, such as ILO Convention 169, and seek to identify risks and design specific mitigation or offsetting measures. Where specific processes do not yet exist in certain areas, ACCIONA Energía undertakes to implement solutions within a reasonable time frame to ensure the active participation of all stakeholders.

With these strategies, the company reinforces its commitment to social sustainability, ensuring that affected communities are heard and effectively addressed, contributing to a positive and lasting impact in the territories where it operates.

[S3-4] TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS

ACCIONA Energía promotes various initiatives aimed at improving the well-being of communities, designed and implemented by different areas of the company according to their specific objectives. These initiatives range from responsible social management linked to projects, services and operations, to sponsorship programmes, volunteering, donations and activities carried out by the acciona.org Foundation, contributing in a comprehensive manner to having a positive impact on the communities and territories where it operates, accelerating the achievement of the Sustainable Development Goals (SDGs).

Within the framework of responsible social management and helping to create a positive legacy in the communities where it operates, ACCIONA Energía has budget items earmarked for implementing social measures deriving from its projects, services and activities. These measures are aimed at managing both positive and negative impacts, whether intended or unintended, and at enhancing the opportunities that territories can offer to maximise the impact of actions.

These impacts are identified and assessed using the SIM methodology, which is based on international standards and evaluates key criteria such as duration, severity, extent and likelihood of impacts. Based on the results of this assessment, and in consensus with the affected communities involved through participatory processes, priority mitigation measures are defined for what are considered high social impacts, ensuring their effective implementation through a systematic process that includes early identification of risks, design of response solutions and continuous monitoring. This approach ensures accurate assessment and prioritises the implementation of measures on social impacts identified as

highly relevant.

In 2024, this collective commitment enabled 338,954 people to benefit directly from the solutions implemented worldwide, thanks to a total investment of €6,571,527 to strengthen communities within the area of influence of the company's projects, activities and services. Beyond investment, these initiatives represent an opportunity to promote access to essential services, generate employment, promote education and contribute to sustainable development centred on people and the environment. As the approach adopted by the company to manage its impact on local communities is based on the integration of these solutions within the corporate model and strategy, the allocation of future financial resources is not structured through a detailed spending plan per action, but is channelled flexibly through these initiatives, depending on identified needs and opportunities for collaboration with communities.

These initiatives, developed in 18 countries, contribute to people's well-being (20%), improve their access to education (12.3%), encourage sport and promote healthy lifestyles (5.6%), among other objectives.

ACCIONA Energía measures and evaluates its investment in the community and the degree to which it contributes to the 17 Sustainable Development Goals. ACCIONA Energía's social investment corresponds to three complementary approaches that put people at the centre:

- One-off contributions (6%), designed to meet specific and immediate social needs.
- Strategic social investment (60.9%), reflecting a joint and long-term commitment to communities, strengthening their resilience and well-being.
- Initiatives aligned with the business (33.1%), which directly drive the company's different businesses while generating a positive social impact.

In relation to the SDGs and the number of initiatives, the five SDGs on which work was most intense were as follows:

- 04 Quality education, with a total of 73 initiatives
- 08 Decent work and economic growth, with a total of 37 initiatives
- 03 Good health and well-being, with a total of 30 initiatives
- 09 Industry, innovation and infrastructure, with a total of 18 initiatives.
- 11 Sustainable cities and communities, with a total of 16 initiatives

Likewise, and if significant impacts on human rights are identified, ACCIONA Energía's methodology requires the design and implementation of specific prevention and mitigation measures. During 2024, no problems or serious cases of human rights violations of affected communities were reported. In addition, the company undertakes to develop or cooperate in the creation of effective remediation mechanisms should these risks materialise, reinforcing its commitment to the protection of the fundamental rights of affected communities.

Social measures are developed and monitored through social management planning throughout the life cycle of the project, activity or service, ensuring alignment with the budget committed during the bidding

phase. This follow-up includes the continuous monitoring of each measure to ensure its correct implementation, as well as the expected impact on the communities. This systematic approach allows ACCIONA Energía not only to manage risks effectively, but also to maximise opportunities to generate shared value in the territories where it operates.

Social Impact Management (SIM) is the cornerstone of ACCIONA Energía's strategies to maximise the positive impact of its projects, services and operations in the communities where it operates. This methodology is embodied in concrete actions, complemented by the Acciona.org Foundation and corporate volunteering, consolidating a global commitment to well-being, access to essential services, as well as socio-economic development, social cohesion and community sustainability.

ACTIONS RELATED TO MATERIAL IMPACTS ON AFFECTED COMMUNITIES

Category	Description of actions	Contribution to objectives and goals	Scope of the action (own operations, upstream or downstream value chain)	Timeline of the measure (present, short term future, medium term future)	Type of resource used (human, material, financial)	Current (or future) financial resource link to financial statements (staff costs, investments in equipment, etc.)
Empowerment measures and generation of positive impacts – Social Impact Management	<p>Social Impact Management (SIM) is the cornerstone of ACCIONA Energía's strategies to maximise the positive impact of its projects, services and operations in the communities where it operates.</p> <p>This methodology is embodied in concrete actions of empowerment and generation of positive impacts focused on the following:</p> <ul style="list-style-type: none"> • Employability, soft skills and work habits training • Training in technical subjects, to perform a trade or for local entrepreneurship • Training, teacher training or school management 	<p>These actions contribute decisively to the following principles of ACCIONA Energía's Stakeholder Relations Policy:</p> <p>a) "Identification and prioritisation of stakeholders" in relation to attention to local communities and vulnerable groups with which the company interacts;</p> <p>b) "Participation in the strategy" in relation to the involvement of local communities in the processes of</p>	Own operations, Downstream value chain	Present	Financial	€87,052

Measures to enhance and generate positive impacts - acciona.org Foundation	<ul style="list-style-type: none"> • Provision of technical means, materials or supplies to school(s) • Promotion of culture • Campaigns to promote science or technology (STEM) careers • Promotion and/or facilitation of community participation processes and mechanisms <p>The work of the acciona.org Foundation stands out for its ability to improve access to basic services such as energy, water and sanitation in order to strengthen the quality of life of thousands of people in rural and remote communities around the world.</p> <p>In 2024, the acciona.org Foundation continued to broaden its reach and deepen its impact, reaching 161,260 people in 33,397 households, as well as small businesses, education centres, among others, with its innovative and sustainable solutions.</p>	defining and implementing actions; c) “Communication and accountability” in terms of listening to their views and the existence of effective communication channels; d) “Dialogue and skills development” in relation to the creation of appropriate spaces for interaction and skills development; e) “Accountability and non-discrimination” in relation to the inclusion of all its stakeholders and respect for their human rights; and f) “Collaboration” in terms of skills development with the private, public and third sectors for the promotion of sustainable solutions.	Own operations, Downstream value chain	Present	Humans	Not applicable - Own financial resources contributed by the foundation acciona.org
Measures to enhance and generate positive impacts - Recovery of	ACCIONA Energía has contributed to the recovery and conservation of an archaeological site from the Chalcolithic period identified during the development and construction of		Own operations, Downstream value chain	Present	Financial	€ 378,754.34

cultural heritage	<p>the Extremadura I-II-III photovoltaic plant.</p> <p>This recovery and conservation activity was carried out once the construction of the plant had been completed, with exhaustive archaeological monitoring to respect the existing remains, and which could be carried out once the plant was in operation.</p> <p>During 2023 and 2024, the excavation works were financed and uncovered a cultural heritage of great archaeological value: an enclosure consisting of a pentagonal inner fort with five bastions, two additional concentric walls and three moats. In addition to the construction, numerous objects from the period have been identified, such as arrowheads, axes, pottery, idols, etc.</p> <p>For more information on this project, see: This photovoltaic complex has contributed to one of the largest archaeological discoveries in Spain Experience ACCIONA</p>					
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Measures to enhance and generate positive impacts – Corporate volunteering and de acciona.org	<p>In terms of volunteering, ACCIONA Volunteer Day 2024 brought together 600 volunteers, including 134 from ACCIONA Energía, and trained 9,800 children aged between 6 and 10 in schools in 13 countries, raising awareness of the importance of sustainable development and the Sustainable Development Goals (SDGs). This event reflects ACCIONA Energía's commitment to involve its employees in promoting environmental and social awareness globally.</p> <p>In addition, volunteering activities were carried out through the acciona.org Foundation, which provided 2,006 hours of corporate volunteering, directly benefiting more than 3,672 people in countries such as Peru (Cajamarca, Loreto and Cuzco), Mexico (Oaxaca), Panama (Ngäbe-Buglé), the Philippines (Palawan) and, for the first time, Chile (Coquimbo). These activities improved access to basic services such as energy, water and sanitation in rural, often remote communities that lack these essential</p>	Own operations, Downstream value chain	Present	Material, Human	Not applicable - Time commitment of ACCIONA Energía volunteers
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	<p>resources.</p> <p>On the occasion of Mandela Day, the ACCIONA Energía team in South Africa visited Deben and Saron primary schools, close to the Sishen photovoltaic plant and the Gouda wind farm in South Africa, to carry out volunteering activities. The 25 volunteers involved, as well as students and teachers from the schools, took part in activities such as painting buildings, cleaning playgrounds and installing recycling bins, as well as improving play and awareness areas.</p>				
Measures to mitigate and offset negative impacts	<p>Social Impact Management (SIM) is at the heart of ACCIONA Energía's strategies to mitigate and offset the negative impacts of its projects, services and operations in the communities where it operates.</p> <p>This methodology is embodied in concrete actions of mitigation and offsetting of negative impacts focused on the following:</p>	<p>Own operations, Downstream value chain</p>	<p>Present</p>	<p>Financial</p>	<p>€ 194,115</p>

	<ul style="list-style-type: none"> • Promotion and/or facilitation of community participation processes and mechanisms • Training / skills development for local small business owners or entrepreneurs • Construction/improvement of community facilities and/or infrastructure, improvement of the public lighting system or improvement of access to drinking water and/or drainage systems • Workshops/training sessions for adults on environmental sustainability • Programmes for the elderly 					
Risk mitigation measures	<p>Social Impact Management (SIM) is the cornerstone of ACCIONA Energía's strategies to mitigate the risks of its projects, services and operations in the communities where it operates.</p> <p>This methodology is embodied in concrete risk mitigation actions focused on the following:</p> <ul style="list-style-type: none"> • Promotion and/or facilitation of community participation processes and mechanisms • Support or refresher programmes in subjects 		Own operations, Downstream value chain	Present	Financial	€ 159,663

	<ul style="list-style-type: none">• Construction/improvement of community facilities and/or infrastructure• Small-scale renewable energy supply• Training and support for local entrepreneurship• Donation of building materials• Educational leisure activities					
Opportunity enhancement measures	<p>Social Impact Management (SIM) is the cornerstone of ACCIONA Energía's strategies to enhance the opportunities of its projects, services and operations in the communities where it operates.</p> <p>This methodology is embodied in concrete actions for the enhancement of opportunities focused on the following:</p> <ul style="list-style-type: none">• Construction/improvement of community facilities and/or infrastructure• Awareness campaigns on diseases with high prevalence in the local community or on healthy habits• Financing of school grants or financial aid		Own operations, Downstream value chain	Present	Financial	€ 2,894,167

<ul style="list-style-type: none">• Provision of school meals for disadvantaged children• Training / skills development for local small business owners or entrepreneurs• Training and support for local entrepreneurship• Repair(s) / Upgrading(s) of facilities at school(s)• Promotion and/or facilitation of community participation processes and mechanisms• Provision of essential materials and/or supplies• Small-scale renewable energy supply• Training in employability and/or social skills and work habits• Provision of technical means, materials or supplies to school(s)• Promotion of sports activities among children/youth• Awareness-raising campaign on an issue linked to environmental sustainability• Educational leisure activities• Logistical support in connection with catastrophic or emergency situations• Improved access to drinking water and/or sewerage systems.• Improved paving or access roads• Donation of building materials					
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	<ul style="list-style-type: none">• Renewable energy access project (through the grid)• Construction or improvement of community green spaces• Support or refresher programmes in subjects• Campaigns to promote science or technology (STEM) careers• Workshops for children and young people on environmental sustainability• Teacher and/or school management training/education programmes• Improvements to the public lighting system					
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Concrete examples of measures to enhance and generate positive impacts

ACCIONA Energía has led campaigns in the field of health, such as Tókt, Cuídat and Píntat de Rosa in Mexico and Costa Rica, aimed at the early detection of breast cancer. In 2024, 547 women were attended through mastography studies, and over six years, 2,935 women have participated in the initiative, enabling the detection of 4 cases of breast cancer, which are receiving appropriate treatment through the Mexican Ministry of Health.

In the area of socio-economic development and social cohesion, ACCIONA Energía's Learn and Undertake Maleku Community programme in Costa Rica trained members of the Maleku indigenous community in the production and marketing of achiote, a traditional condiment. This programme not only strengthened the local economy, but also preserved the cultural heritage of the Maleku people, promoting sustainable development based on their traditions.

The acciona.org Foundation extended its global rural electrification initiative *Luz en Casa* (light in homes) to more homes in Peru, Mexico, Panama, Chile and the Philippines; continued adapting this initiative for the refugee population in Ethiopia in alliance with other Spanish organisations; implemented and put into operation two photovoltaic plants to guarantee electricity supply in rural educational centres in Peru and South Africa; and developed together with Action against Hunger the *REact* tool for evaluation and sustainable energy proposals for humanitarian action. Likewise, in the area of water and sanitation, it initiated two projects in Mexico, co-financed respectively by the Spanish Cooperation Agency (AECID) and the Gonzalo Río Arronte Foundation, and continued to improve rural systems in Chile.

In terms of human rights protection and cultural preservation: The company has supported the Poniec Children's and Youth Orchestra in Poland, financing the acquisition of new instruments which have enabled the group to win international prizes, promoting music as a tool for social cohesion and cultural development.

In terms of community awareness, ACCIONA Energía has strengthened technical skills in the Atacama region of Chile through a public-private partnership designed to improve the employability of young people in the energy industry, fostering a just transition towards a more inclusive economic model.

These initiatives are just one reflection of ACCIONA Energía's comprehensive commitment to integrating sustainability and social impact management into all its business activities, generating lasting positive impacts in the communities where it operates, and promoting well-being, economic development, awareness and the protection of human rights in all the projects it leads.

Concrete examples of measures to mitigate and offset negative impacts

ACCIONA Energía has implemented various measures to mitigate, offset and/or minimise negative impacts on local communities, ensuring that its actions are aligned with the Sustainable Development Goals and generate positive results in the affected communities. To address these impacts, the company takes a comprehensive approach that includes ongoing measurement and evaluation of its social investments. This evaluation not only provides insight into the degree of impact of its actions, but also facilitates the comparison of its results with those of other companies and guides decision-making in terms of investment and the development of new initiatives.

Specific measures adopted by ACCIONA Energía to mitigate the negative effects of its projects, such as the reduction of farmland, include the DESARROLLA Villalba del Rey programme by ACCIONA Energía, an initiative aimed at boosting the oil cooperative in Villalba del Rey (Cuenca, Spain). During project development, a social study and community engagement process identified the reduction of farmland for several tenants as a key challenge. In response, a farmer advisory and rating programme was designed and implemented, which in 2024 celebrated its second year of implementation. This programme has

helped farmers to optimise the management of their olive crops, improving both the quality and productivity of the oil, thus promoting crop sustainability and an increase in the income of local farmers.

In response to a social conflict generated by the construction of the San Juan de Marcona wind farm, ACCIONA Energía implemented a productive development plan for the Artisanal Fishing Community of San Juan de Marcona (Ica, Peru) to improve the working conditions of 15 fishing organisations, facilitating access to coves, refurbishing corporate headquarters, and providing fishermen with new equipment. These actions aim not only to repair the impact caused, but also to create an environment of collaboration and long-term economic development for the community.

ACCIONA Energía also implements additional measures to foster social well-being in the affected communities, promoting job creation, training local workers and strengthening the business fabric and local economies. These actions are complemented by strategic investments aligned with the specific needs of each territory, aimed at promoting companies and businesses that generate sustainable value in the community. ACCIONA Energía also prioritises the implementation of initiatives that protect the environment and improve quality of life, such as guaranteeing access to essential energy and water services, thus contributing to the comprehensive and balanced development of communities.

To assess the effectiveness of these measures, ACCIONA Energía measures and continuously monitors the results of its investments and social actions, in order to ensure that enhancement, mitigation and/or offsetting measures generate the desired positive impacts. Through this approach, ACCIONA Energía not only seeks to mitigate negative impacts, but also to generate sustainable development opportunities in the communities where it operates.

Concrete examples of risk mitigation measures

The company has a comprehensive risk management and mitigation system covering all business lines. This system is designed to identify, assess and manage operational and reputational risks that may impact local communities. Through regular assessments, standardised protocols and advanced technological tools, we ensure the implementation of preventive and corrective measures at every stage of projects and operations.

The mechanism of ongoing dialogue with local communities is the main tool to mitigate social and operational risks. This mechanism includes prior consultations, the establishment of collaborative task forces and the development of active participation programmes. These actions allow for early identification of potential conflicts and needs, promoting consensual solutions that strengthen mutual trust and help obtain the social licence to operate.

A) Reputational and operational risk as a result of poor relationship management with local communities and generation or aggravation of social conflicts

At ACCIONA Energía, local community relations are managed in a transparent and participatory manner. In this way, the aim is to prevent certain local actors from being disadvantaged. An egalitarian, transparent and truly participatory relationship is achieved through various mechanisms for meetings, information and citizen participation. A prominent example is the MacIntyre Community Engagement Committee (CEC), in which local citizens become representatives of the community's interests and act as intermediaries between the project and the community to share information, warn of problems and advise on actions to be taken to mitigate negative impacts.

In this sense, in the municipality of the Ayora I, II and III photovoltaic plant (Jarafuel, Valencia, Spain), information and citizen participation meeting points were held, where participants had the opportunity

to vote on their preferences for the social investment plan and received personalised information about the technical, social and environmental aspects of the photovoltaic project.

In the area of influence of the Ouroso wind farm (Asturias, Spain), currently under development, social opposition to the development of wind farms due to landscape and tourism impacts was managed through a participatory process with the local tourism association in which the sector's demands and needs were detected and incorporated into the social investment plan.

Apart from operational and social risks, there are environmental risks that can affect both local communities and the sustainability of the company's operations. These risks, linked to natural resource availability, ecosystem changes and pollution, also represent significant challenges for communities. While these issues are addressed in more detail in the environmental chapters of the report, their management is an integral part of the company's overall social risk mitigation strategy.

Concrete examples of opportunity enhancement measures

ACCIONA Energía promotes and takes advantage of opportunities identified in its system for detecting and managing social impacts, risks and opportunities (IROS). One of the key measures implemented is the strengthening of social impact management through specific protocols designed to assess and minimise negative impacts on communities, thus facilitating the obtaining of the social licence to operate. In addition, the company promotes strategic alliances with key actors, such as local administrations and community organisations, in order to align interests and ensure the necessary support during all stages of the projects.

B) Contribution to socio-economic development and social cohesion

Analysing local conditions and engaging in dialogue with local stakeholders allows us to detect the main challenges faced by the community and turn them into opportunities for ACCIONA Energía's social intervention. Through this process, the best ways to address their challenges and solve their main problems are designed with the communities.

In this regard, in the area of influence of the Escepar and Peralejo PV hybridisation plants, it was detected that the main cooperative in the municipality of Villalba del Rey (Cuenca, Spain) was in a critical situation due to previous mismanagement. ACCIONA Energía, following a participatory process with the community, decided to carry out the DESARROLLA Villalba del Rey programme to help revitalise the oil cooperative. Thanks to this project, the cooperative has not only overcome its crisis situation, but has also increased and improved its oil production and created new jobs.

Another example of how, following social analysis, local problems are identified and solutions are implemented to address them is the Kinderkinetics project in South Africa. Due to the low level of academic achievement in Northern Cape primary schools and the high prevalence of Fetal Alcohol Syndrome (FAS) cases in this province, an intervention was sought that could address this problem early. Kinderkinetics is a scientifically-based movement development programme that aims to optimise the development of the whole child. This programme, which has been in place for years, is therapeutic, preventive and/or ameliorative in nature to meet the specific needs of the child, as determined through a scientifically-based assessment process.

Another key action is the optimisation of operational processes through efficient planning and proactive conflict mitigation, which helps to reduce execution times and ensure the long-term economic sustainability of operations. These measures, combined with evaluation and continuous improvement based on results and international best practices, reinforce ACCIONA Energía's commitment to the

generation of shared value and the creation of favourable environments for the development of sustainable projects that benefit both local communities and the organisation.

In this regard, during the construction of the San Juan de Marcona wind farm in Peru, an agreement was reached with the Marcona Artisanal Fishing Community (COPMAR) help improve their working conditions. In the operation of the El Romero photovoltaic plant (Chile), it has collaborated with the Diaguita Indigenous Community in the refurbishment of its community headquarters. In the operation of the photovoltaic plants in Almeyda and Malgarida (Chile), two collaboration agreements were signed with the Colla Geoxcultuxial Indigenous Community to support the Colla Indigenous Community's entrepreneurship and a programme to improve the housing of the neediest members.

Assessing the effectiveness of measures targeting IROs

ACCIONA Energía carries out annual external third-party assessments to ensure that its projects comply with the highest standards of social sustainability and respect for human rights, in turn aligned with the company's strategic objectives. These audits cover two main areas of assessment, reflecting a comprehensive approach to responsibly managing social impacts and respect for human rights in the communities and workers involved:

- Implementation of SIM Methodology:** verifies compliance with the Corporate Standard on Social Impact Management, ensuring the correct application of SIM principles in all phases of projects, services and operations within the scope of the standard. All key aspects of the methodology are assessed, from the characterisation of social risk, risk-based budget allocation and assessment of the area of influence, to the identification and assessment of social impacts (positive and negative, actual or potential) and the correspondence between proposed social measures and prioritised impacts. They also include a review of the identification, categorisation and prioritisation of stakeholders, the relationship between them, and the quality and effectiveness of the dialogue and communication mechanisms established with them.
- Human Rights and Workers' Well-being:** focuses on ensuring that projects respect human rights and promote fair working conditions, with special attention to migrant workers. The audits include assessing compliance with corporate standards related to equal treatment, non-discrimination and harassment, access to complaint and remediation mechanisms, freedom of association, and compliance with international standards on child and forced labour, among others. This is done using specific tools such as checklists, well-being standards and structured staff interview guides designed to identify areas for improvement and promote responsible practices.

In 2024, these audits reaffirmed that both the SIM methodology and social safeguards measures, with a focus on respect for human rights, are being applied rigorously, consistently and coherently with the company's business model and strategy. This comprehensive approach enables ACCIONA Energía to strengthen its commitment to social sustainability, ensuring that its projects make a positive contribution to the well-being of the communities and workers involved, while promoting the continuous improvement of its internal processes and operational excellence.

EVOLUTION OF SOCIAL AUDITS IN PROJECTS

	2021	2022	2023	2024
TOTAL NO. OF AUDITS	2	2	2	2



METRICS AND TARGETS

[S3-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

ACCIONA Energía establishes clear objectives and specific targets, aimed at generating a positive and lasting impact on the communities where it operates. These targets are designed to address negative impacts, leverage positive benefits and manage material risks and opportunities, all as part of a strategic approach that connects local priorities with global challenges.

In the context of its Social Function, ACCIONA Energía's objectives include acting as a driver of social transformation, promoting more equitable, inclusive and sustainable development. This approach, aligned with the Sustainable Development Goals (SDGs), aims to mitigate inequalities, combat exclusion and improve access to essential services. The company tailors each intervention to the specific needs of the territories, ensuring that global targets result in practical and sustainable local solutions.

In line with this focus on alignment with the SDGs, ACCIONA Energía has set a target in all its territories to place special emphasis on activities related to the following Sustainable Development Goals:

- 03 Health and well-being
- 04 Quality education
- 08 Decent work and economic growth

To measure progress towards achieving these objectives, ACCIONA Energía develops and implements tools such as external social audits, which verify the alignment of its initiatives with the impacts identified and ensure compliance with social management standards. These tools not only identify areas for improvement, but also optimise the results of social interventions, consolidating their effectiveness and relevance in the territories of influence.

The firm intention to integrate social sustainability as a key element in decision-making is reflected in the significant increase in the incorporation of social criteria in ACCIONA Energía's projects, which rose from 35 in 2021 to 136 in 2024. This progress demonstrates the company's commitment to aligning social sustainability with other strategic factors, aligning with internal and external requirements, including contractual, legislative and financing requirements. It also shows how this approach has established itself as a fundamental pillar within the organisational culture, extending its application to a growing number of projects and strengthening its impact on communities.

EVOLUTION OF THE IMPLEMENTATION OF SOCIAL CRITERIA IN PROJECTS*

	2021	2022	2023	2024
TOTAL NO. OF PROJECTS	35	114	133	136
TOTAL NO. OF COUNTRIES	10	13	19	18

*The scope of this metric is limited to communities located in the area of influence of projects, operations and services defined within the scope of the Corporate Standard on Social Impact Management of Projects.



This growing integration of social criteria in ACCIONA Energía projects is reflected in the increasing number of projects in which the methodology is applied from the initial phases of the search for opportunities and throughout all phases, including construction, operation and decommissioning of the facility, if applicable.

Within the framework of the Sustainability Master Plan 2025, ACCIONA has set specific targets such as reaching 100,000 hours dedicated to volunteering by the end of 2025, thus strengthening its commitment to active participation in the transformation of communities. This objective is backed by the creation of the Volunteering Office in 2024, which promotes and manages in a coordinated manner the ACCIONA Volunteering Programme in the different areas of the company and which is structured into volunteering led by the *acciona.org* Foundation, recognition programmes, institutional volunteering and project volunteering.

The volunteering programme mobilised 694 ACCIONA Energía volunteers in 2024, who dedicated 5,304 hours to activities benefiting more than 26,574 people in various regions. These actions have included projects to improve access to essential services, reforestation activities, educational workshops on the SDGs, support for the careers of young university students and facilitating the labour integration of women in vulnerable situations, including those with disabilities and victims of gender-based violence, among others.

ACCIONA Energía also establishes strategic alliances with local and international associations, entities and organisations, which are essential to guarantee the success and sustainability of its initiatives. These alliances reinforce the ability to meet the objectives set and to consolidate a social and environmental legacy in the communities affected by its operations.

Finally, ACCIONA Energía undertakes to further strengthen its approach to social sustainability by developing advanced methodologies that integrate Social Function results with regulatory requirements and stakeholder expectations. This commitment translates into targets aimed at consolidating the transformative impact of social initiatives, ensuring that each action effectively contributes to creating shared value and building a fairer future.

1



S4 END CUSTOMERS AND CONSUMERS

Strategy

Impact, risk and opportunity management

Metrics and targets



S4 End customers and consumers

DISCLOSURE REQUIREMENTS

STRATEGY

[S4-SBM-2] INTERESTS AND VIEWS OF STAKEHOLDERS

[S4-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND THE BUSINESS MODEL

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S4-1] POLICIES RELATED TO CONSUMERS AND END-USERS (CORPORATE POLICY BOOK)

[S4-2] PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

[S4-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

[S4-4] TAKING ACTION ON MATERIAL IMPACTS, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS AND EFFECTIVENESS OF THOSE ACTIONS AND APPROACHES

METRICS AND TARGETS

[S4-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES (CONSUMERS AND END USERS)

STRATEGY

[S4-SBM-2] INTERESTS AND VIEWS OF STAKEHOLDERS

STRATEGY FOR END CUSTOMERS AND CONSUMERS

ACCIONA Energía, in its role as a comprehensive provider of sustainable solutions that operates in various sectors of activity, has a specific strategy for each of its lines of business, adapting to the particularities of its customers and end users. All these strategies are aligned with the Sustainability Master Plan and the company's Quality Assurance, Human Rights and Stakeholder Relations Policies.

ACCIONA Energía's businesses, within the framework of its management systems, mainly the ISO 9001 quality management system, whose main focus is customer satisfaction, collaborate annually with customers by analysing the needs and expectations of stakeholders, including customers and end users. The improvement actions derived from these analyses serve as inputs to guide the strategy of each business line, for example, in the form of objectives, including the objectives defined in the document that defines ACCIONA Energía's sustainability strategy: the Sustainability Master Plan (SMP) and, specifically, the "Exponential Leadership" pillar.

Through the SMP, ACCIONA Energía's business lines, using the "Authenticity" lever, share the same values and work for the same purpose in each workplace. One of the action vectors for the annual development of the SMP objectives is: To have quality and customer satisfaction indicators, verified by independent third parties, promoting annual improvement plans when necessary.

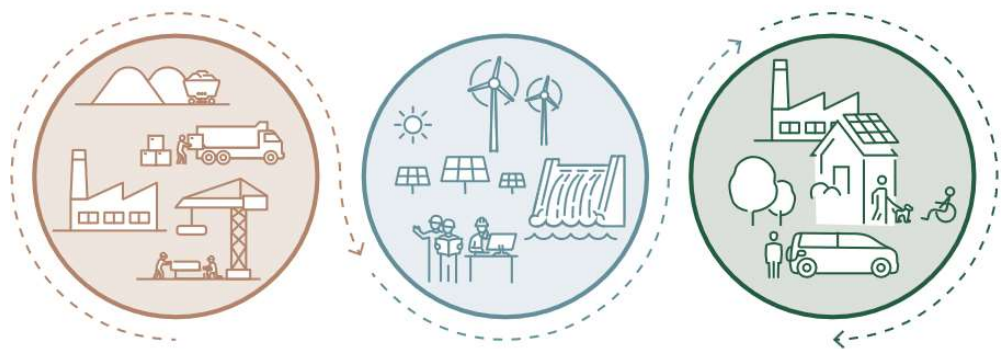
The main function of the ISO 9001 certified systems of ACCIONA's businesses is to meet customer and end user needs.

The performance and results of the ISO 9001 quality management systems are reported annually to senior management and to the governing body through the Audit and Sustainability Committee (CAS), which reports, among other things, on the supervision of internal controls related to the quality management systems.

[S4-SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND THE BUSINESS MODEL

ACCIONA Energía has identified and assessed the positive and negative impacts, risks and opportunities in relation to Customers: End consumers and/or users. In this respect, it has followed a systematic approach in line with CSRD requirements, details of which can be found in Annex I (with hyperlink) of this report. The process carried out yielded the following results.

Impacts, risks and opportunities identified



Sub-topic	Upstream Value Chain	Own Operations	Value Chain: Downstream
Incidents related to end consumer or user information			NI - Potential leaks or misuse of personal or business data of customers or consumers R - Potential fines, penalties for the company or loss of reputation with customers as a result of the above
Personal safety of end consumers or users			R - Potential consequences as a result of customer security incidents

Caption:
NI - Negative impacts
PI - Positive impacts
R – Risks
O – Opportunities

Considering the sub-topics and sub-sub-topics identified in the ESRS S4, no positive consumer-related impacts and opportunities have been identified. The positive impact and opportunity related to the climate benefit for our customers and consumers is detailed in section E1-SBM-3.

NEGATIVE IMPACTS

Two potential widespread negative impacts have been identified for ACCIONA Energía customers and consumers:

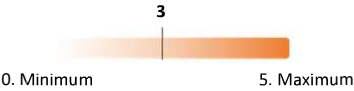
Potential leaks or misuse of **personal data** (Impact 1) or **business data** (Impact 2) of customers or consumers



RISKS

Two potential risks have been identified:

Potential fines, penalties for the company or loss of reputation with customers as a result of bad practices related to the use of **personal or business data** (Derived from Impact 1 on customers or consumers)



Potential fines, penalties for the company or loss of reputation with customers as a result of **customer security incidents** (Derived from Impact 2).



The company's customers are as varied as its businesses (see table of products and services for public and private customers). It mainly works with large organisations, both in the Business to Business (B2B) field, covering both the public and private sectors, as well as with financial investors. However, some of businesses have a direct relationship with end customers or users, i.e., under the Business to Customer (B2C) model.

PRODUCTS AND SERVICES FOR PUBLIC AND PRIVATE-SECTOR CUSTOMERS

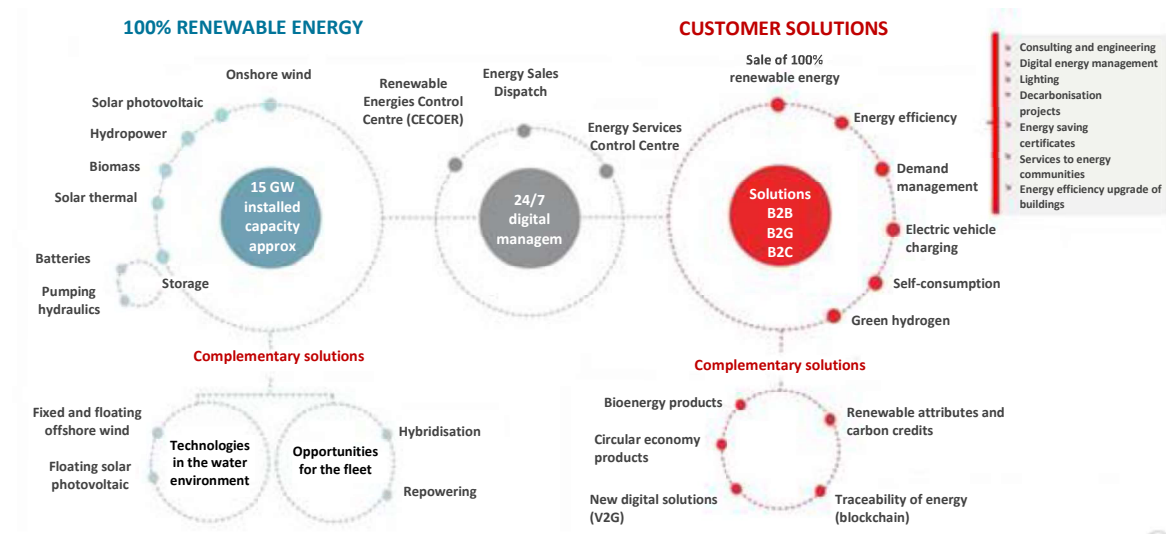
ACCIONA Energía is the largest global energy company²⁰ with a track record of more than 30 years operating exclusively in renewable technologies and with a history marked by the absence of legacy of fossil fuels, placing us at the forefront of the decarbonisation process with advanced solutions for customers that enable companies, institutions, businesses and individuals to reduce their carbon footprint.

In order to offer a complete portfolio of services that contribute to the full decarbonisation of the economy, the company specialises in demand-side solutions to support the private and public sector in their green transition. Among other solutions, Acciona Generación has become a leader in the sale of 100% renewable energy to customers, both globally in the long term and in the short term in Spain, where it is the largest 100% renewable energy supplier according to the Spanish Markets and Competition Commission (Comisión Nacional de los Mercados y la Competencia).

²⁰ Excluding Chinese operators



In line with this purpose, structures, teams and processes have been redefined in order to refocus customer management and work in a centralised manner on a broad portfolio tailored to the needs of its customers. Below is a description of the company's main lines of business, as well as the type of customers it serves, for which details of the different requirements requested will be provided in the following sections.



Type of products and services	Public and private business-to-consumer (b2c) and business-to-business (b2b) customers
Energy trading (including PPAs)	Spain: > 16,000 private and 80 public sector customers. Portugal: > 3,000 private customers and more than 300 public customers. Chile: 28 B2B (15 public/13 private) Mexico: 10 Total energy traded: 19.8 TWh.
Electric mobility	92,920 users registered and 4 B2B customers (2 public contracts and 2 private contracts).
Energy efficiency	- 30 B2B customers Spain (Esco) - 15 public and 378 private customers. France. (Equinov)
Implementation of energy solutions in households and small businesses	817 Total customers - 119 B2B. - 698 B2C
Remote operation and control of generation assets	12 private B2B customers
Solar Farm Customers	2,747 B2C customers

Each of these lines of business represents a specific and tailored approach to market needs in both the public and private sectors, reflecting the diversity and breadth of the company's portfolio.

TRADING

ACCIONA Energía provides electricity trading services from renewable sources to key accounts (corporate customers, public administrations and large industrial customers) and small and medium-sized enterprises (SMEs). Acting as a bridge between its generation facilities and end consumers, the trading business line offers a comprehensive service that guarantees the supply of renewable energy, backed by the renewable attributes of the energy generated at ACCIONA Energía's assets. This value proposition enables customers to meet their decarbonisation targets and access energy solutions tailored to their needs.

POWER PURCHASE AGREEMENTS

ACCIONA Energía's green power purchase agreements offer customers price stability and reliable supply, in addition to the renewable attribute of the energy. The signing of new agreements in this period with Brembo, which renews the existing agreement for a further ten years in Poland (WF Gostyn, 33 MW) or with DaVita (Ayoras II and III) and Vidrala in Spain (15% PE AEGA and Alígar), as well as the incorporation of new agreements under the Fortia contract, also in Spain, confirms the satisfaction of these customers with their relationship with Acciona Energía.

Acciona Energía has more than 19.8 TWh marketed in different countries such as Spain, Australia, USA, Portugal, South Africa, Chile and Mexico, where generation comes from photovoltaic and wind power assets with a cumulative capacity of 13.18 MW.

ELECTRIC MOBILITY

Acciona Recarga offers its customers the installation, operation and exploitation of electric vehicle charging points, creating its own public access network that provides service to B2C end users or helping companies (B2B) to install their own networks for their target groups (generally the workforce). To this end, it complements the service with its own software (app) for managing these charging points, which it uses as the main communication channel with its customers.

ENERGY SERVICES

Acciona ESCO provides services to B2B customers aimed at improving the energy efficiency of their facilities and production processes, complemented by renewable electricity generation facilities and energy consumption monitoring projects to manage savings. Its customers are both private and public. The latter are usually municipal administrations where the projects are focused on improving services to citizens or their own municipal services, with a focus on decarbonisation and sustainability. As for private customers, the spectrum is wide, both in terms of sector (pharmaceutical, automotive, textile, buildings, services, etc.) and territory (Spain, France, Mexico, Poland, etc.).

Recently, services such as the management of CAEs (Energy Saving Certificates) and energy renovation projects for residents' associations have been added to the portfolio of this line of business.

EQUINOV is a demand response operator in France, where industrial and tertiary consumers already have the possibility to put their electrical flexibility at the service of the grid at peak consumption times. Using proprietary digital tools, the company can offer digital energy flexibility and aggregation services to the electricity system.

EFFICIENCY SERVICES TARGETED AT HOUSEHOLDS AND SMALL BUSINESSES

The household and SME business line provides services mainly to:



- Individuals and homeowners associations interested in reducing their electricity bills and improving their sustainability and homeowners associations with collective solutions for shared self-consumption installations.
- EPC (own) facilities that seek to optimise their energy consumption or generate their own energy and facilities with investment from ACCIONA to supply energy to different consumers within a radius of 2 km.

SOLAR FARMS

Solar farms are groups of owners of photovoltaic installations that share common infrastructures and services. Located in Navarre, Castilla-La Mancha, Extremadura and Aragon, the solar farms promoted by ACCIONA Energía have a total capacity of 62 MWp and are owned by almost 3,000 people.



More information: [technologies and solutions](#)

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[S4-1] POLICIES RELATED TO END CONSUMERS AND USERS

ACCIONA Energía has a Policy Book, in which it makes a commitment to all its stakeholders, including customers and end users, to reduce risks and promote opportunities and reduce the impacts linked to its activity. One of the company's priority objectives is to meet the needs and expectations of customers and users.

All the Book policies are formulated by senior management in the relevant area and are approved by the Audit and Sustainability Committee, which is a delegated committee of the administrative body, the Board of Directors of ACCIONA. The Audit and Sustainability Committee oversees compliance with environmental, social and corporate governance policies.

The commitment to these policies extends to all the businesses and countries in which ACCIONA operates. The following policies manage the material issues of S4-SBM-3 (privacy and protection of information, and health and safety of customers and users).

Quality Assurance Policy:

ACCIONA Energía undertakes to provide value to its stakeholders through the excellent management of its processes, taking responsibility for ensuring compliance with the applicable requirements, both legal and voluntary, subscribed to by the company, and to be a benchmark in implementing good practices, considering the demand for continuous improvement of the quality of its products and services, as well as the various management systems implemented, to be a priority. This culture of quality and efficiency in operations extends across all the Divisions and countries in which ACCIONA Energía operates.

Principles

- **Leadership** - The company's senior management takes the lead and is committed to quality management throughout the organisation.

- **Strategic alignment** - The established quality objectives are aligned with the Quality Assurance Policy, as well as with the company's mission, vision and strategy.
- **Risk and opportunity management** - The company manages the risks and opportunities identified in its processes to achieve planned results, reduce negative impacts and take advantage of opportunities as they arise.
- **Customer and other stakeholder satisfaction** - ACCIONA Energía listens to its customers and other stakeholders, identifying their needs and expectations and taking them into account in carrying out its activities, in order to offer them products and services to their full satisfaction, fostering the creation of mutually beneficial long-term relationships.
- **Maximum quality and safe use of products and services** - ACCIONA Energía applies the utmost rigour in carrying out its activities to ensure the quality and reliability of its products and services, guaranteeing safe use for customers and users.
- **Continuous improvement** - The company encourages innovation and the development of specific projects to improve its processes, which allow it to identify good practices and lessons learned, creating a culture of a constant quest for operational efficiency.

ACCIONA Energía's Personal Data Protection Policy:

This policy reflects ACCIONA Energía's commitment to the personal data protection and guarantee of digital rights, in alignment with applicable local and international regulations. ACCIONA Energía aims to ensure transparent, lawful and proportionate personal data processing, guaranteeing the right to privacy and other fundamental rights. The company also seeks to integrate these practices into all processes and phases of the information life cycle, fostering continuous improvement in data security management.

Risks associated with data processing, such as unauthorised access, loss of information or regulatory breaches, are managed through the implementation of specific technical and organisational measures. In addition, this policy promotes trust among stakeholders and reinforces ACCIONA Energía's reputation for sustainability and digital governance.

The policy applies to all organisational units of ACCIONA Energía, including employees, suppliers, partners and customers that handle personal data. Its scope covers all phases of the information life cycle, from collection to deletion. In consortia or partnerships where ACCIONA does not exercise direct control, the adoption of this policy is encouraged wherever possible.

Data that are not considered personal according to current legislation, as well as activities outside the scope of ACCIONA Energía's operations, are excluded from the policy.

The Data Protection department, which is part of the Legal Department, leads the implementation of this policy, with the support of the Data Protection Committee, made up of representatives from key areas of the company. In addition, each organisational unit will designate specific persons responsible for ensuring the implementation of and compliance with the protection measures in its field of competence.

ACCIONA Energía undertakes to observe national and international regulations on personal data protection, including the European Union's General Data Protection Regulation (GDPR) and recognised information security standards.

The policy has been developed taking into account the interests of key stakeholders, including employees, customers and business partners. Mechanisms are in place to inform and ensure access to this policy for all stakeholders.

This policy is publicly available and communicated through internal and external channels, including its incorporation into contracts with third parties and employee training programmes, to ensure awareness and correct application.

Finally, the Data Protection Committee will regularly review this policy to ensure its validity and suitability in the face of regulatory or technological changes. Any updates will be communicated in a transparent manner to the parties concerned.

Policy drafting:

The principles adopted by ACCIONA Energía regarding personal data protection indicate how personal data must be collected, processed, transferred and stored, as well as how the rights of data subjects should be exercised, in order to guarantee the right to privacy and other fundamental rights of citizens. The principles relating to personal data processing are:

- Personal data must be processed lawfully, fairly and transparently.
- Personal data must be collected for specified, explicit and legitimate purposes.
- Personal data must be adequate, relevant and limited to what is necessary in relation to the processing.
- Personal data must be accurate and up to date at all times.
- Personal data must be kept in a way that permits identification of data subjects for no longer than is necessary for the purposes of the processing.
- Personal data must be processed in such a way as to ensure their security.
- Proactive responsibility.

ACCIONA Energía's commitments regarding personal data protection, which ensure compliance with the principles specified, are detailed below:

- Comply with applicable legal and regulatory requirements, and align with internationally recognised standards and best practices.
- Promote the development and implementation of its own body of regulations, which establishes the bases for the integration of protection in the processing of personal data in all the organisation's processes, guaranteeing respect for the rights of data subjects.
- Integrate the protection of personal data in all phases of the information life cycle, technological systems and organisational or technological processes, protecting all those means responsible for processing, communicating or storing it.
- Understand personal data protection as an integral process aimed at continuous improvement (plan, do, check and act).

- Develop a management model based on criteria of legality and proportionality, aligned with business strategies, which will enable an adequate analysis and management of the risks affecting the principles of personal data protection, taking the necessary measures to protect them.
- Ensure the governance of this management model by creating an organisational structure for personal data protection and defining responsibilities from a proactive approach. Based on the above and for the corresponding adoption of the aforementioned commitments, the following responsibilities are established:
- ACCIONA Energía Management will require and ensure compliance with personal data protection by the entire organisation and all persons with access to such data, including its suppliers and contractors, or partners, among others.
- Each division or business unit will be responsible for the implementation of the necessary measures to ensure an adequate level of security in its business area.
- Any person with access to ACCIONA Energía information containing personal data, whether as internal or external staff, must comply with the aspects set out in the policy, regulations, procedures and any other document relating to personal data protection. Failure to comply will be subject to the application of the corresponding disciplinary rules determined by ACCIONA Energía.

Implementing these commitments and responsibilities will result in the following benefits for ACCIONA:

- Improved protection of personal data based on a process of continuous improvement and provision of resources, knowledge, procedures and tools.
- Consolidation of trust in the organisation by customers, partners and suppliers, accompanied by an improved public image.
- Ensuring compliance with legal and ethical requirements, reducing the costs of non-compliance with personal data protection regulations, through the progressive implementation of security controls.

The policy is binding on all organisational units or companies and entities of the ACCIONA group, as well as for its employees, suppliers, partners and customers, among others, that collect or process personal data. In turn, it will apply to all phases of the information life cycle containing personal data (collection or generation, distribution, storage, processing, consultation and destruction).

Human Rights Policy

ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse human rights impacts. The organisation is committed to providing effective means of remediation throughout its value chain.

Through its Human Rights Policy, the company ensures the protection of human rights in all its stakeholders, including its customers and consumers. It also establishes legitimate and effective mechanisms to remedy the adverse impacts that it may cause or contribute to generating on the human rights of its stakeholders, including consumers.

This Policy is aligned with the International Bill of Human Rights, i.e. the set of documents consisting of the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its 8 core conventions; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the UN Convention on the Rights of the Child; the UN Global Compact; and the Seoul Declaration on Safety and Health at Work.

Stakeholder Relations Policy

ACCIONA develops a sustainable business model based on the generation of shared value, trust and long-term commitment to its stakeholders, including customers and users.

Through the principle of value creation. ACCIONA manages the promotion of the local economy, seeks to contribute value to stakeholders in the geographical areas in which it operates by developing business models that contribute to their sustainable development, and is committed to preventing and mitigating the economic, social and environmental risks that could affect its customers and users, among other stakeholders.

Through the Communication and Dialogue Channels principle, ACCIONA provides its stakeholders, including customers, with appropriate and accessible channels to gather their suggestions, needs, expectations, views and complaints, as well as to provide them with transparent, truthful and rigorous information on the fulfilment of the commitments undertaken with them and the results of its business management.

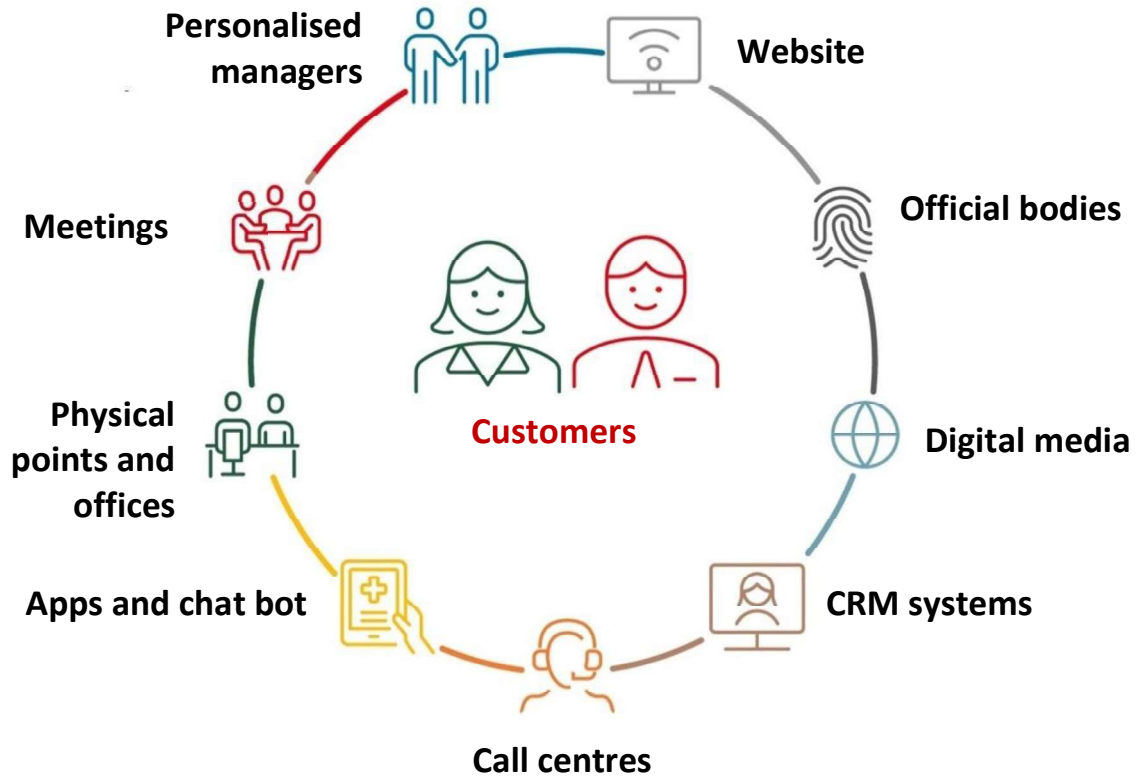
 **More information:** [ACCIONA Energía's Policy Book](#)

[S4-2] PROCESSES FOR ENGAGING WITH END CONSUMERS AND USERS REGARDING INCIDENTS

Within each business line, and throughout its value chain, there are areas and operational managers in charge of guaranteeing adequate communication and ensuring the involvement of customers and end users so that each concern is managed and leads to concrete results. Due to the diversity of services offered by the company, there is no single operational manager for customer management in ACCIONA Energía for the entire ACCIONA Group. However, the Board of Directors takes overall responsibility for the quality assurance policy, which includes a commitment to ensure that all products and services comply with established standards, as well as to ensure the health and safety of customers and users.

Interaction with ACCIONA's customers takes place on two levels. Mainly in a Business to Business (B2B) context, with private and public sector entities, as well as financial investors and with end consumers and end users with whom there is a direct Business to Consumer (B2C) relationship.

Communication Channels with Customers and End Consumers



- CRMs, such as the one used in the energy trading and energy services businesses.
- Customised managers, as in renewable energy supply PPAs.
- Digital media and support. Give an example
- Physical service points at the offices for solar installations.
- Call centre in the energy trading business
- Chat bot to help clients on the website or the app.
- Information available to customers on relevant aspects of the company, through press releases, news on the website, reports, articles and interviews, participation in round tables, publication of technical articles, etc.
- Communication with customers is constant. In addition to the above channels, there are regular meetings with customers and informal communications through the most common channels, such as e-mails or social media.

CUSTOMER COMMUNICATION PHASES

In ACCIONA Energía, each department adapts its strategy and leadership according to the specific needs of its activity, always in line with the company's Quality Assurance Policy, so as to provide a more personalised service to end customers and consumers. The different approaches, value chain stages, topics and communication channels are reflected in the different business lines:

Business	Project / service phase	Most popular topics	Communication channels
Renewable energy trading	Pre-sale	Commercial Offer	Commercial App
	Sale	Contract	
	Activation of the contract	Contract activation information	E-mail address
	Supply	Invoice availability	
		Customer service	Phone / e-mail / customer website
		Opening of case (grievance or complaint)	E-mail address
		Intermediate case management information	E-mail / phone call / customer website.
		Case closure	E-mail address
		Case management satisfaction survey	
Formalisation of PPAs	Commercial	Service conditions / Prices / Offer	Direct via e-mail-phone, and other communication channels such as Teams.
	Contract negotiation	Review of contractual conditions	
	Formalisation of contract	Closing contract	
	Supply	Invoicing issues	
ACCIONA Recarga	B2C operation	Information on the use of the Application	
	B2B operation	Use issues	
	B2B sales	Commercial offers	
	B2B Engineering	Status of progress on installations	
Digital Energy Services and CECOSE	Energy monitoring and management	Customer service Production and consumption reports Satisfaction surveys	Telephone / e-mail PDF documents / E-mail Forms (Microsoft) sent via e-mail

Energy Services ACCIONA ESCO SL	Construction and O&M	Construction Follow-up. End of Work Operation and Maintenance Guarantee.	Face-to-face meetings. Work completion certificate Telematic review meetings. Final Acceptance Document
Solar Farms	Provision of operation and maintenance services	All types of issues affecting their installation(s)	Personalised managers, call centres
		Legislation, invoicing, incidents, production, taxation, changes of ownership, etc.	Meetings, Physical locations and offices, Teams
		All types of issues affecting their installation(s)	Call centres
		Modification of personal data, doubts or suggestions, contact request	Website

The range of communication channels available (written, spoken, app, web, physical points, etc.) with customers and consumers means that dialogue can be adapted to the diverse needs of people with disabilities. In the specific case of minors who are customers, communication and contact are always with the designated legal guardian who has the legal capacity to do so.

In energy efficiency projects, Acciona ESCO, together with the customer, analyses the implications for vulnerable people or those at risk of exclusion, incorporating, in some cases, people of this nature into the team to collaborate in this phase and propose solutions adapted to their needs.

All ACCIONA Energía's business lines are included in the scope of the quality management system certified to the ISO 9001 standard, in all the territories where the company operates; projects and activities are incorporated into this management system as they are launched. Activities included in the scope of the management system are:

- Development, design, construction, operation and maintenance of wind farms.
- Development, design, construction, operation and maintenance of photovoltaic plants.
- Operation and maintenance of hydroelectric power plants.
- Operation and maintenance of biomass plants.
- Operation and maintenance of solar thermal plants.
- Operation, maintenance and services of solar farms.
- Real-time operation and control of renewable energy generation facilities.
- Energy management. Energy trading.
- Technical engineering/consultancy services and management of self-consumption projects and energy solutions. Implementation, operation and maintenance of them. Activities as a party delegated to act, as defined in the regulations of the national system of energy saving certificates.
- Technical engineering/consultancy services and management of energy efficiency projects with investment, including maintenance. Consumption monitoring to improve efficiency.

- Supply, installation, project execution, legalisation and maintenance of charging points for electric vehicles. Management of charging at electric vehicle stations.

All Energy Services activities (customer solutions) are also certified by external bodies that endorse the effectiveness of its quality management system. Similarly, ACCIONA ESCO's activity in Spain has an ISO 50001-certified energy efficiency management system for the energy efficiency measures it implements for its customers, and it is recognised as an Energy Service Provider in accordance with UNE 216701.

ACCIONA Energía Hogares y Pymes, a company incorporated into the ACCIONA Energía Group in 2023, also has the quality seal of photovoltaic installer for self-consumption, as a benchmark in the sector.

ACCIONA Generación Renovable, S.A.'s research, development and innovation (R&D&I) management system remains certified under the UNE 166002:2021 standard.

[S4-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

As ACCIONA Energía is a multi-business and multi-customer company, with both B2B and B2C business, the processes for resolving concerns, grievances or complaints are not identical in all business lines. However, all of them have processes in place to remedy negative impacts and channels for customers and users to raise concerns, submit grievances or complaints.

The Ethics Channel is available to all customers and users in case they want to submit a case that is related to breaches of the principles set out in the Ethics Channel or the company's Policies. The Ethics Channel Policy guarantees whistleblower confidentiality and expressly prohibits retaliation against whistleblowers. The company has policies in place to protect customers and end users from retaliation when using the aforementioned complaint processes: Ethics Channel Policy (G1-1).

The business lines make various means and channels available to their customers and users so that they can submit grievances, complaints, requests or raise concerns or make suggestions. All these channels are managed directly by ACCIONA Energía or under the company's supervision. They all share the same philosophy:

- All businesses have a complaints handling process in place to act with due diligence on complaints, concerns or concerns from their customers and users. As part of the ISO 9001 quality management system, the business lines have detailed procedures defining how the customer can use these channels and how communications are responded to, followed up and resolved.
- The company characterises complaints, distinguishing between B2B or B2C and their type. It measures response times and monitors them until they are completely resolved, with specialised staff dedicated to responding to customers and users in these situations.
- Information provided to customers and users on the status of their complaints and their resolution and closure, once the person who filed the complaint confirms that he/she is satisfied or it has been rejected with adequate justification.
- Yearly recording and measurement of grievances and complaints received.
- Measurement of the number of complaints that are closed or pending and the time spent on them. Definition of action and/or improvement plans as needed.

The grievances and complaints handling system adapts to communication channels to ensure quick and easy handling for the customer. In any case, to ensure consistent responses from customer service teams, there is a manual that deals with standard cases and their resolution methods. A supervisor or specialist is always available to provide expert advice on the incident in case of doubt.

In activities with a large number of customers or users, the communication mechanisms are extended and diversified, with the main channels being telephone and e-mail contact. In these cases, computer systems are in place to record all the steps taken in response to a customer request, assigning tasks to the appropriate teams depending on the nature of the request, until it is resolved. The use of these tools allows for analysis at different levels of granularity.

For renewable energy trading services, grievances and complaints are dealt with through channels such as telephone, e-mail, the corporate website and ordinary mail, in compliance with the specific regulations of each country in which it operates. Issues raised by customers (queries, complaints, grievances) are recorded in specific computer systems, where a unique code is provided to customers for follow-up (CRM). All incoming cases must have an initial analysis carried out in less than 1 day, in an attempt to provide an initial response to customers. From there, the type of problem is assessed and it is verified whether the customer's request is indeed appropriate. If so, it is resolved (in certain cases, through the corresponding energy distribution company) in less than 15 days by the trader.

For B2B energy service solutions, in some contracts, mostly public, there is a call centre system to deal with incidents, proposals for improvement and complaints from customers and users of the service provided (mainly public lighting). This system is channelled according to the priorities and type of communication, to the O&M teams to resolve the incident as soon as possible. It is worth noting that in 2024 this type of incident fell by more than 70%. In 2024, there were no work performance complaints on B2B contracts of ACCIONA ESCO SL.

For B2C energy service solutions, the Customer Service (called “hello self-consumer”) and the Call Centre, which is available during working hours from Monday to Friday and is supported by the digital resource “Aircall”, which enables more efficient handling and management of customer calls, have been internalised. The management of each query or incident is recorded in a specific computer system (Hubspot) to ensure its traceability and to be able to carry out an efficient analysis by describing it and assigning it to the most appropriate person in charge. If the incident requires corrective action, we try to resolve it remotely, and if this is not possible, a scheduled visit is coordinated with the customer.

In electric mobility services, ACCIONA Recarga's grievances and complaints service is managed by telephone, the contact form on the website, and has an IT system for management purposes. Each interaction generates a unique ticket within the system, allowing for detailed tracking. In 2024, it had an average resolution time of 5.3 days for incidents and 13 days for complaints.

In solar farm services, ACCIONA Recarga's grievances and complaints service is managed by telephone, the contact form on the website, e-mail and personal attention in the offices. An instant messaging system is also available. In solar farms this year we worked on several aspects to improve the customer experience and thus minimise the number of complaints as much as possible, going from 22 in 2023 to 2 in 2024.

EVOLUTION OF COMPLAINTS

	2021	2022	2023	2024
Business to Business (B2B)				
No. of complaints	160	1,192	5,802	3,264



B2B complaints successfully closed (%)	90 %	84%	94%	97%
Business to Consumer (B2C)				
No. of complaints	31	32	219	184
B2C complaints successfully closed (%)	100%	100%	100%	100%

B2B customer complaints

Significantly, the reduction in the total number of complaints (around 44%) from B2B customers is largely due to the implementation of initiatives and improvements in the area of Customer Services and other management tools.

The trader in Spain has a 97% satisfactory complaint closure rate (even though it has a higher volume of customers and business), and 100% in Portugal, Chile and Mexico.

In the case of Spain, this 97% of complaints closed satisfactorily represents an increase of 3 points compared to the previous year's result (94%), due to the improvement of the operating systems and the consolidation of the Customer Service team and process of the renewable energy electricity trader in Spain.

B2C customer complaints

There has been a 34% decrease in the total number of complaints. This year's complaints came mainly from the electric mobility activity, due to the increase in users of the electric vehicle charging service, maintaining low response times, as well as 100% satisfactory closures.

Audits

ACCIONA Energía implements an annual programme of internal audits to ensure and evaluate the degree of effectiveness of the different management systems around the world. These audits cover all business lines, facilities and countries, taking into account a representative sample of all the company's workplaces. In 2024, 96 internal audits were carried out.

In addition, external audits are carried out by the relevant certification bodies for the management systems implemented.

The only country that receives customer audits is Mexico, which must arrange a visit from CFE Mexico to audit (throughout the year) compliance with the Quality, MA and PRL standards of the Federal Electricity Commission (Comisión Federal de la Electricidad).

Customer satisfaction

Measuring customer satisfaction is one of the most effective tools for planning actions to improve the experience of consumers, users and counterparties.

Satisfaction indicators analysed are derived from both direct measures (asking customers about their overall satisfaction or satisfaction with specific processes) and indirect measures (performance indicators, compliance with service levels or contracted terms, renewal rates, etc.).

Direct satisfaction measurement campaigns are adapted to the type of service or product contracted, ensuring that the channels and frequencies used are optimal and do not saturate the customer. Thus, automatic experience rating processes have been implemented in specific processes, such as customer service or contracting (asking random customers about the information on the offer received, the attention received before signing, the signing process) or customer service, beyond the global surveys that try to capture the overall perception of the service and that are collected through digital or telephone channels.

In addition, customers can leave reviews on other digital channels, such as social networking sites, app stores or product and service review websites, so reviews and ratings are regularly swept on these websites and app stores.

Examples of customer feedback methodology in direct campaigns:

- ACCIONA Recarga: via mail with form;
- ACCIONA Solar: telephone campaign replaced by postal mail if the telephone number is not available; two additional e-mail campaigns.
- ACCIONA ESCO by means of a survey form sent by e-mail to customers by those responsible for the service and direct interviews with customers.
- Eginov by annual survey via online form for energy flexibility customers and quarterly surveys for White Certificates and energy consultancy customers.
- ACCIONA Energía Hogares y Pymes through calls to random customers or with a rating after a call with the customer service department or through a follow-up form at the end of the incident.
- ACCIONA Green (renewable energy trader in Spain) with calls to a representative group of customers, and through app ratings or after consultation with customer service;
- Renewable energy trader in Mexico half-yearly form-based survey.
- Renewable energy trader in Chile: survey via e-mail with form
- Renewable energy trader in Portugal: survey via e-mail with form

Furthermore, ACCIONA Energía analyses certain performance **indicators** from which degree of customer satisfaction can be inferred, such as, for example:

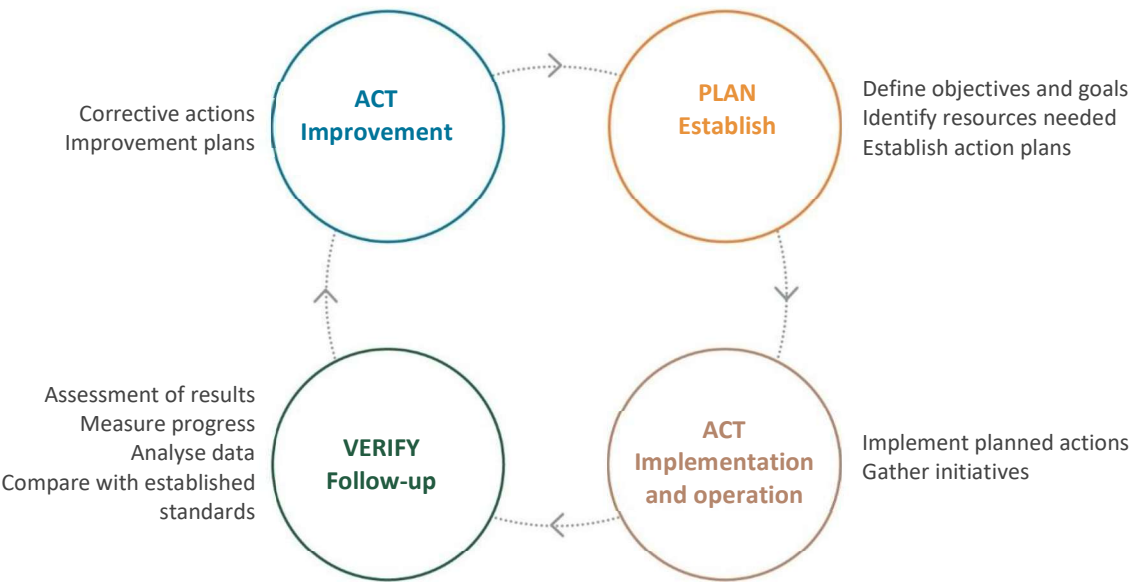
- Contracting times
- Service availability (ACCIONA Recarga)
- Number of grievances and complaints received
- Time taken to resolve incidents, grievances or complaints.
- Customer churn rate
- Repeated contracting of new services by the same customer.

EVOLUTION OF CUSTOMER SATISFACTION (%)

	2021	2022	2023	2024
Satisfied customers	100%	100%	99.6%	99.95%



[S4-4] TAKING ACTION ON MATERIAL IMPACTS ON END CONSUMERS AND USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO END CONSUMERS AND USERS, AND EFFECTIVENESS OF THOSE ACTIONS



In accordance with the principles of the PDCA (Plan, Do, Check, Act) Deming Cycle, ACCIONA emphasises the identification of continuous improvement opportunities as a key aspect of its organisational strategy. Through rigorous assessments and systematic reviews, the company is firmly committed to achieving greater quality and efficiency in its operations.

ACCIONA Energía works with certified technological solutions that certify compliance with the quality and safety standards of the products it offers, in addition to operating instructions and manuals for customers and users.

In 2024, there was no record of court rulings regarding the violation of regulations or voluntary codes relating to marketing communications or on breaches related to information and labelling of products and services.

Electric Mobility: All the chargers in the network have a sticker with instructions for use, as well as a QR to download the Acciona Recarga App and access additional information.

Energy Efficiency: Installed equipment is always CE certified as evidence that the manufacturer has carried out a procedure to assess the essential health and safety requirements laid down in various regulations. ACCIONA ESCO does not generate any additional labelling of the products implemented in our projects.

Energy services in households and SMEs: The equipment is CE certified as evidence that the manufacturer has carried out an assessment procedure of the essential health and safety requirements laid down in different regulations. In addition, as a good practice of Acciona Energía Hogares y Pymes, each switch is labelled on the electrical panel of the installation, thus facilitating its identification and providing a safe environment for the management of the installation. Furthermore, once the installation has been completed, the customer receives the “Technical Documentation and Manuals”, which contains the

technical, usage and safety information associated with the installed device published by the manufacturer.

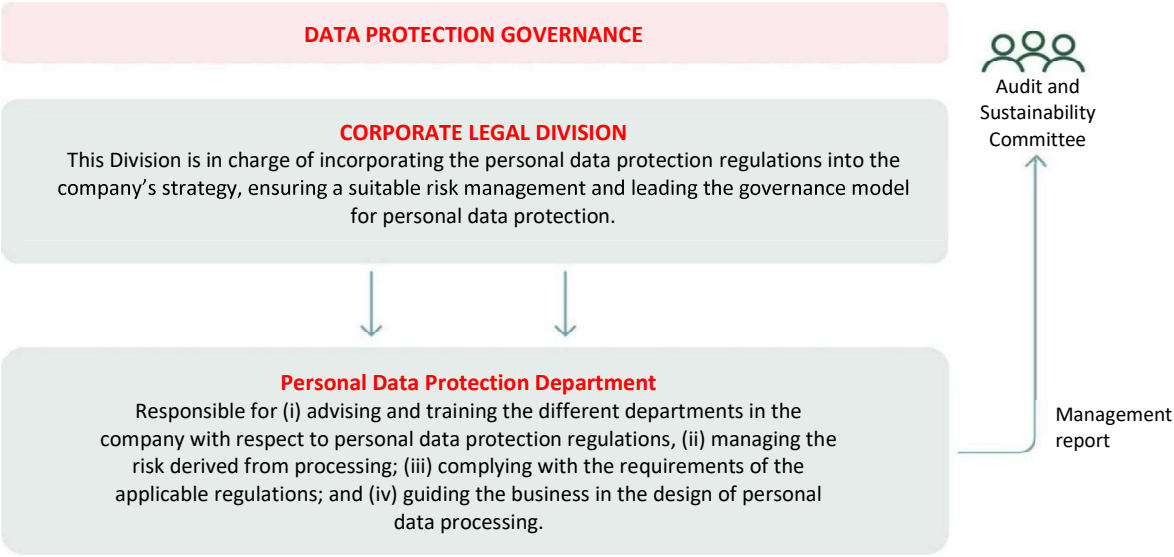
PERSONAL DATA PROTECTION AND THE GUARANTEE OF DIGITAL RIGHTS

ACCIONA Energía is committed to the digitalisation and automation of processes to improve company efficiency and the customer and employee experience. With a view to overcoming the challenges entailed in becoming an entity that guarantees personal data protection, the company believes that having suitable security measures is a priority.

The importance of this issue is reflected in ACCIONA’s Policy for Personal Data Protection and Guarantee of Digital Rights. The internal regulations, with a global scope, sets forth that the company, its subsidiaries and, by extension, all of its value chain, are required to act adhering to the principles and rights set by law for the protection, processing and privacy of personal data.

In relation to assigning resources to this issue, ACCIONA has a specific Personal Data Protection department that leads and monitors the organisation's commitment to the responsible use of identifiable information of customers, consumers, employees and partners and the protection of their personal and business data.

To guarantee adequate management of personal data protection, the following organisational structure has been established:



The training/information given by ACCIONA Energía to all its employees on data protection is mandatory. To extend this culture to the supply chain, ACCIONA Energía’s suppliers must acknowledge the terms of Statement of Compliance, which includes specific commitments on personal data protection, as part of the established control mechanisms.

Over the course of 2024, the company was not subject to any sanctions in the area of personal data protection.

CYBERSECURITY MANAGEMENT

Regarding the assignment of resources to this issue, the company has an Information Security Management Committee made up of the CFSO (Chief Financial and Sustainability Officer), the Corporate Security Manager, the Technology and Processes Manager, the Human Resources Manager, the CFSO of ACCIONA Energía, the Corporate Resources Manager of ACCIONA Infraestructuras and the Group's Cybersecurity Manager. This committee is responsible for promoting and supporting the establishment of technical, organizational and control measures that guarantee the integrity, availability and confidentiality of information, within a general framework to manage cybersecurity risks. This makes such measures compatible with the necessary sharing of information and knowledge between the various organizational areas in ACCIONA.

For coordination purposes, there are different operational Cybersecurity Committees, in which the main cybersecurity managers of the different areas, functions, companies and territories that may be determined in each case participate. Moreover, ACCIONA Energía has established a specific Cybersecurity Committee. Within the framework of ACCIONA's cybersecurity, (compliant with the different international standards, including NIST CSF and ISO 27001), all the control targets and procedures are defined for cybersecurity. As part of this instrument, the company has a Cybersecurity Policy and an employee awareness and training plan, in addition to procedures and mechanisms so that any worker is able to report a security incident or suspected security incident. At the same time, it holds the ISO 27001 certification for the information security management system associated with the security services provided internally from the central offices. The Group also carries out contingency and incident plans for various information security risks. These plans are reviewed on an annual basis depending on the plan.

In 2024, there were no cybersecurity incidents that impacted the Group's operations.

METRICS AND TARGETS

[S4-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

ACCIONA Energía annually implements a set of objectives within the framework of its management systems (mainly ISO 9001, as it is the standard whose mission is customer and user satisfaction), with customer opinions as one of its inputs. In addition, and linked to the ACCIONA Group's strategy, objectives are defined within the framework of the Sustainability Master Plan, a document that defines the global sustainability strategy. Specifically in the "Exponential Leadership" pillar, "Authenticity" lever.

These improvement objectives have concrete targets and deadlines to measure and promote:

- Combating significant negative impacts: arising from possible non-compliance, grievances or complaints or negative results of the customer satisfaction survey.
- Promoting positive impacts: through improvement actions identified in the monitoring and measurement of the quality management system.
- Risk and opportunity management: following an analysis of the context and stakeholders (including customers), an annual risk and opportunity assessment is carried out, the results of which serve as input for setting annual improvement targets.

Renewable energy trading

Target	Targets to achieve the objective	Scope of targets (geographical, other if applicable)	The objective is related to: [Note of the sworn translator: omitted text according to customer instruction]	How customer/user feedback is taken into account in setting the objective (what customer input has led to the setting of this objective)	Level of achievement and how it is measured
Improving customer satisfaction	SLA: < 24 hours	Spain	Handle our customers' requests more quickly	Based on the satisfaction surveys we conduct	90%. Power BI report that allows you to measure times reflected in CRM
Case resolution audit	Ensure proper resolution	Spain	Handle customer requests with the highest quality of service	Based on the satisfaction surveys we conduct	100%. Quarterly audit with case sampling
Contract validation	Ensuring proper contracting	Spain	Avoid commercial fraud	Based on the satisfaction surveys we conduct	100%. We validate 100% of the contracts that come through our channels
New Customer Website	New features	Spain	Facilitate the management of requests for our customers	Based on the satisfaction surveys we conduct	80%. New features to be added during 2025

Solar Farms

Target	Targets to achieve the objective	Scope of targets (geographical, other if applicable)	The objective is related to:	Level of achievement and how it is measured	
Increase customer training	Conduct training meetings for the entire Customer Management team on more complex and necessary topics, in order to improve knowledge and therefore the customer experience in commercial contacts. Development of training pills	Spain	Exceed customer expectations: provide customer management training	No. of meetings held/scheduled	100%
Increase customer training	Hold training meetings for the entire SOLAR FARMS team, related to the presentation of the different taxes that affect customers, in order to improve our knowledge.		Exceed customer expectations: provide customer management training	No. of meetings held/scheduled	100%
Targeted campaigns to increase customer contact	Draw up a list of customers with ratings equal to or lower than 6 and/or customers with higher ratings but who have included comments.		Enhance Customer Experience	No. of campaigns carried out	100%
Annual satisfaction survey	Call all customers who do not have a prior rating. For this purpose, a process or guide will be followed, which will also include a data review, rating survey, etc. Arguedas I, Sesma, Arguedas II, Rada and Cintruénigo.		Increase customer awareness	Annual customer experience survey conducted	100%

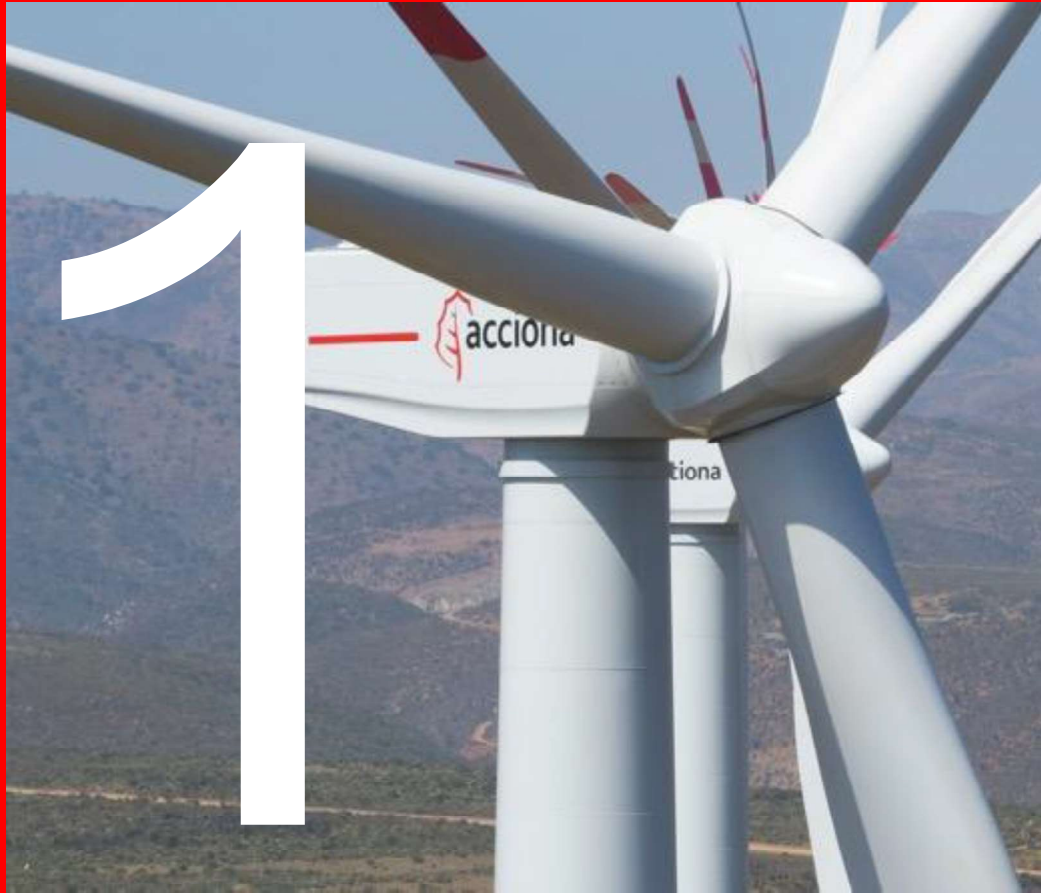
Reduction in no. of complaints	Produce a complete and detailed report of all our customers' complaints with the different types for 2024. Establish improvement area and identify strengths and weaknesses. Produce 2, one at the end of the first half-year and one at the end of the year.	Evaluate complaints lodged by customers, implement proposals for improvement, analyse the complaint process and the solution provided.	2023 22 complaints 2024 4 complaints	100%
Open Day	Complete organisation of the open days at the 3 largest farms in Navarre -	Positive customer impact	Bardenas, Corella and Milagro	100%
Customer Web Improvement	Update Solar's web content. Develop content improvements	Positive customer impact: immediate and personalised information	Improved web implemented in customer channel	100%

Electric Mobility

Target	Targets to achieve the objective	Scope of targets (geographical, other if applicable)	The objective is related to:	Level of achievement and how it is measured
Increased number of registered users	Reach a volume of more than 80,900 users	Spain	Increased end customer/user portfolio	Number of new user registrations in the application: a total of 95,810 registrations.
Increase % of calls answered	% > 90		Quality of service	92% < 3 minutes



1



G1 BUSINESS CONDUCT

Governance

Impact, risk and opportunity management

Metrics and targets

Entity-specific



G1 Business Conduct

DISCLOSURE REQUIREMENTS

GOVERNANCE

[GOV-1] THE ROLE OF THE ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES IN MANAGING IMPACTS, RISKS AND OPPORTUNITIES

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[G1-1] CORPORATE CULTURE AND CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

[G1-2] MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

[G1-3] PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

METRICS AND TARGETS

[G1-4] CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY

[G1-5] POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

[G1-6] PAYMENT PRACTICES

ENTITY-SPECIFIC

[Entity-specific] SUSTAINABLE FINANCING

[Entity-specific] RESPONSIBLE TAXATION

GOVERNANCE

[GOV-1] THE ROLE OF THE ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES IN MANAGING IMPACTS, RISKS AND OPPORTUNITIES

ACCIONA Energía has a governance model made up of different bodies and committees:

- The Board of Directors, in matters of ethics and anti-corruption, is the body responsible for (i) ensuring the existence in ACCIONA Energía Group of a Crime Prevention and Anti-Corruption Model (CPACM); (ii) establishing the values and guidelines for the conduct of members of the organisation and third parties that have relations with it; and (iii) promoting a preventive culture based on the principle of “zero tolerance” towards the commission of illegal acts and situations of fraud and the application of the principles of ethics and responsible behaviour of all the Group's professionals, regardless of their hierarchical level and the country in which they work.
- The Audit and Sustainability Committee, in matters of ethics and anti-corruption, is assigned the following functions, among others: (i) approving and monitoring the Annual Plan for the supervision of the operation and efficiency of the CPACM proposed by the Compliance Division; (ii) analysing the results of the reports on the operation and supervision of the CPACM; (iii) taking decisions on the recommendations and action plans proposed as a result of the assessment of the design and effectiveness of the CPACM, as well as monitoring and supervising them and reporting to the Board of Directors on the results of the supervision carried out; (iv) supervising the responsibilities of Internal Audit and the Compliance Division in relation to the CPACM and ensuring their independence; (v) promoting regular assessment of the perception of the Group's employees, or of a significant sample of them, regarding the ethical culture of the organisation and the effectiveness of compliance with the Code of Conduct and the Group's policies that mitigate or reduce criminal risks; and (vi) supervising the activity of the Ethics Channel Committee and in particular the resolution of communications on any wrongdoing received.
- The experience of the members of the Board of Directors, including in relation to business conduct issues, is detailed in the Distribution of the Board of Directors section of this Report. Likewise, the Management Team is made up of experienced staff, also in the area of business conduct, whose knowledge is regularly updated through training actions in this area (more information in section G1-3).
- The Ethics and Anti-Corruption Management Committee is responsible for the strategic decision-making and management of the organisation, including ensuring that the elements and tools of the CPACM are incorporated into all processes and procedures.
- The Management Team, in matters of ethics and anti-corruption, is assigned the following functions, among others: (i) direct and support all members of the organisation in the exercise of their Compliance duties, ensuring that they integrate them into their activities in the organisation; and (ii) certify, on an annual basis, the knowledge and acceptance of the Code of Conduct, Crime Prevention and Anti-Bribery Policy and Anti-Corruption Guidelines, as well as any other rules that the Compliance Division may require due to the activities carried out.
- The Compliance Division is an autonomous area under the supervision of the Audit and Sustainability Committee and reports regularly to the Steering Committee. This Department is responsible at the operational level for the deployment, supervision, monitoring, review and continuous improvement of the CPABM.
- The specific duties performed by the Compliance Division are as follows: (i) prepare and present the Annual Plan for supervision of the effectiveness and efficiency of the operation of the CPACM, in coordination with Internal Audit; (ii) regularly present to the Audit and Sustainability Committee and the Management Committee the supervision and monitoring reports on the CPACM, as well as the review and verification reports, together with the appropriate recommendations for improvement and action plans, and promote the implementation of the approved corrective

measures and plans; (iii) advise on the resolution of doubts and queries arising in the application of the policies, processes and controls that have an impact on or are integrated into the CPACM; (iv) promote communication and training programmes for members of the organisation on the duties imposed by the Code of Conduct, internal policies and regulations, and applicable legislation for the prevention of crimes with the greatest potential impact on the organisation; (v) promote dissemination and knowledge of and compliance with the Code of Conduct, ensuring that the particularities applicable in each jurisdiction and in the different businesses are taken into account; and (vi) promote the approval of the rules necessary for the development of the Code of Conduct and for the prevention of breaches thereof, in collaboration with the different corporate divisions of the organisation.

- This Division coordinates with compliance divisions and bodies in the ACCIONA Group, as well as the rest of the areas that carry out prevention, detection and management of specific compliance risks in ACCIONA Energía.
- The Ethics Channel Committee is the collective body responsible for ACCIONA Energía's internal reporting system, and is responsible for managing the Ethics Channel. The organisation allows everyone to report through this Channel any wrongdoing, breaches or behaviours within the framework of ACCIONA Energía's activities which may be contrary to the current legal framework, the Code of Conduct, and/or the Group's ethical values.

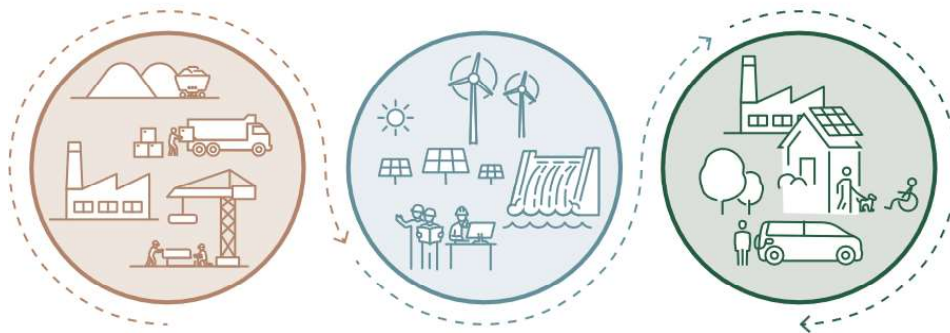
IMPACT, RISK AND OPPORTUNITY MANAGEMENT

[IRO-1] DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

ACCIONA Energía has identified and assessed the positive and negative impacts, risks and opportunities in relation to its business conduct. In this respect, it has followed a systematic approach in line with the CSRD requirements, details of which can be found in Annex I of this report.

A total of 16 issues have been identified, of which 11 have been considered relevant and related to the company's activities. The relevant impacts, risks and opportunities identified in the process are represented below.

Impacts, risks and opportunities identified



Sub-topic	Value Chain: Upstream	Own Operations	Value Chain: Downstream
Corporate culture, Corruption and bribery	PI - Promotion of ethical conduct in relations with stakeholders	PI - Positive contribution of the company in tax matters, contributing to community and social development R - Potential incidents in matters of ethics, anti-corruption or taxation	PI - Promotion of ethical conduct in relations with stakeholders
Management of relationships with suppliers, including payment practices	PI - Implementing due diligence and procurement practices that promote sustainability in the supply chain	R - Potential incidents in supplier management matters	
Political commitment and lobbying activities			PI - Promotion of the energy transition to a decarbonised model for the electricity sector and adjacent sectors, and transparency in ESG management

Caption:
NI - Negative impacts

PI - Positive impacts

R – Risks

O – Opportunities

Positive impacts

They fall into the following categories:

- Promoting ethical conduct in relations with stakeholders: this is related to maintaining high ethical and anti-corruption standards in relations with the company's various stakeholders, which contributes to the adoption and extension of these practices in the value chain.
- Positive contribution of the company in tax matters: the responsible payment of taxes has a positive impact by generating resources to finance public services that are fundamental for society. In addition, it promotes social stability and the development of the communities where the projects are carried out.
- Implementing due diligence and sustainable procurement practices: the requirement and extension of these principles to the upstream supply chain contributes to the adoption and extension of these practices in the value chain.
- Promotion of energy transition, decarbonisation in adjacent sectors, and transparency in ESG management: ACCIONA Energía publicly supports and promotes these issues, encouraging the transition to a more sustainable economic and social model from the public, business and social spheres.

Risks

They fall into two categories:

- Potential ethics, anti-corruption or tax incidents: The materialisation of potential incidents of malpractice in these areas, with consequences for the company's reputation, fines or sanctions, is identified as a risk.
- Potential tax incidents: The materialisation of potential incidents of malpractice in these areas, with consequences for the company's reputation, fines or sanctions, is identified as a risk.

As part of the materiality exercise, no negative impacts or opportunities related to the management of Business Conduct have been identified.

ACCIONA Energía's Crime Prevention and Anti-Corruption Model aims to foster a culture of ethics and compliance in the organisation, establishing conduct guidelines, as well as mechanisms to detect, prevent and, where appropriate, mitigate potential risks.

The risk analysis starts by identifying the universe of Compliance risks and analysing their applicability to ACCIONA Energía, taking into account its specific context. For each of the risks deemed applicable, the following actions are implemented:

- The areas and activities carried out at ACCIONA Energía that are inherently exposed to each risk are identified. For each non-applicable crime, the reason for its non-applicability is detailed.

- The level of exposure to each risk is analysed under likelihood and impact parameters.
- Controls are identified to mitigate identified risks and specific residual risk assessment criteria are applied.
- Compliance risk analysis considers contextual factors, both exogenous and endogenous, associated with the processes exposed to the typical behaviours considered applicable, including impacts associated with non-compliance. Control analysis, for its part, considers factors of design effectiveness and operational efficiency.

The continuous improvement of risk analysis is fed by the constantly evolving information associated with the universe of risks analysed, the activities carried out, the risks materialised, the evolution and functioning of the controls implemented, the opportunities for improvement identified, the improvement plans implemented and other parameters considered for their assessment.

The diverse nature of the activities carried out by ACCIONA Energía, as well as its presence in multiple jurisdictions, entails exposure to compliance risks of a broad and diverse nature that apply both locally and, at times, offshore. To manage these risks, the Group has a Crime Prevention and Anti-Corruption Model which is completed with specific compliance risk control models.

For its part, the process of identifying material opportunities is a continuous improvement task through which the needs and expectations of internal and external stakeholders regarding compliance are identified and recorded, and the extent to which ACCIONA Energía responds to them through the CPACM.

Risk analysis and due diligence on third parties

The risk analysis and continuous improvement process of the CPACM is complemented by the identification, assessment and management of ethics and integrity risks in different key processes of the Group, including the process of assessing business and investment opportunities and the analysis and monitoring of suppliers, partners and business consultants.

Regarding this last process, ACCIONA Energía has its own internal regulations with the fundamental standards required to perform due diligence on third parties: the Corporate Procurement Standard, the Corporate Procedure for Supplier Approval and Evaluation, and the Corporate Standard for the Hiring of Business Consultants.

For its part, the management of risks associated with partners and business consultants is based on a third-party due diligence tool, which allows the company to obtain the necessary information on the identity of the third party, who manages and directs the company, any possible links these individuals may have with public officials, or any potential litigation in relation to corruption, money laundering, fraud or involvement with tax havens and sanction lists, among other information. This tool also yields a risk level linked to the collaboration with that third party, i.e., taking into account not only the risk associated with the third party, but also the risk associated with the commercial operation being analysed. Depending on the risk level produced, enhanced due diligence measures are put in place, where appropriate, including the submission of a statement of compliance regarding ethics and standards or the submission of questionnaires requesting further information. The number of third parties approved for registration in 2024 was 131, a 42% increase on the numbers registered in 2023. This increase is due to the strengthening of due diligence processes within the framework of business opportunity approvals and improved awareness of these processes among the organisation's members.

Risk analysis and due diligence in the supply chain

The risk analysis process developed in the area of supply chain management is detailed in section [G1-2] Management of relationships with suppliers.

[G1-1] BUSINESS CONDUCT AND CORPORATE CULTURE POLICIES

[Code of Conduct](#)

ACCIONA Energía's Code of Conduct establishes the principles, values and commitments that must guide the behaviour of all companies in the Group and the third parties with which they interact. Its general objectives include:

- Consolidate ethical business conduct and compliance.
- Guide relations between the members of the organisation, as well as with third parties, including shareholders, public and private institutions, and society at large.
- Promote values such as honesty, leadership, excellence, concern for the environment, social responsibility, long-term approach, financial strength, customer focus, innovation and caring for people.

The process of updating and monitoring the Code of Conduct includes consideration of the business conduct expectations of CPACM stakeholders and the implementation and monitoring of the measures necessary to ensure compliance. The latest update of the Code of Conduct was approved on 13 November 2024 by the Board of Directors of ACCIONA Energía.

The Code of Conduct, as well as the Policy Book that implements it, is binding on all members of the organisation, regardless of their hierarchical rank and geographical location. It applies to all investees in which Corporación Acciona Energías Renovables, S.A. has management control, as well as to entities and organisations linked by a relationship of control or whose management is the responsibility of Corporación Acciona Energías Renovables, S.A., in any jurisdiction. It also promotes the adoption of similar principles and values in those companies in which it has a non-controlling stake.

For their part, ACCIONA Energía's administrative and management bodies are responsible for the application of the Code of Conduct, undertaking to use all the means at their disposal to ensure compliance with the values and principles contained in the Code.

In line with the provisions of the Code of Conduct, ACCIONA Energía takes the Universal Declaration of Human Rights, the Declaration of Fundamental Principles and Rights at Work and the Conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact as its basic guidelines for behaviour.

The Code of Conduct, as well as the Policy Book and the Ethical Principles for suppliers, contractors, and collaborators, are available on [ACCIONA Energía's website](#) and are disseminated to ensure that all members of the organisation and related third parties understand and apply the principles reflected in these documents. In addition, educational and awareness-raising initiatives are promoted to ensure that all members of the organisation understand and apply the principles of the Code in their daily activities.

ACCIONA Energía has a Ethics Channel accessible so that anyone can report any wrongdoing, breaches or misconduct related to ACCIONA Energía's activities contrary to the current legal framework, the Group's Code of Conduct and/or ethical values.

Fight against corruption, bribery and money laundering

ACCIONA Energía has a [Policy Book](#), approved by the governing body of ACCIONA Energía, which is based on the mission, vision and values of the organisation, and which highlights the applicable principles in economic, social, environmental and good governance matters. In the economic and good governance area, the following policies for the fight against corruption and bribery, anti-competitive practices, as well as money laundering, stand out:

Anti-Corruption Policy:

ACCIONA Energía through this Policy publicly expresses its support and respect for the fundamental principles included in the United Nations Convention against Corruption and the Global Compact Reporting Guidelines based on Principle 10 on anti-corruption, undertaking to work against corruption in all its forms, including extortion or instigation of crime, bribery, conflict of interest, influence peddling, document falsification, money laundering, insider trading and fraud, resulting from any of the aforementioned practices. The general objectives of this Policy include:

- Reflect the principles for the establishment of relations with third parties based on professional ethics, promoting a culture of integrity within the organisation.
- Prevent and detect corruption through training and dissemination of ethical behaviour.
- Ensure transparency and accountability in all operations.

Arising from the Anti-Corruption Policy, ACCIONA Energía has Anti-Corruption Action Guidelines, which provide specific guidelines for avoiding inappropriate conduct and are applicable to and binding on all members and groups associated with ACCIONA Energía (including intermediaries, advisors, consultants and suppliers) regardless of their geographical location. These guidelines extend to all commercial and business relationships, including the supply chain.

Crime Prevention and Anti-bribery Policy:

ACCIONA Energía's Crime Prevention and Anti-bribery policy strengthens the group's zero-tolerance commitment in respect of illegal activities, using permanent monitoring measures for preventing and detecting any such actions, effective mechanisms of communication and awareness-raising in all employees and a corporate culture based on ethics and observance of the law. The general objectives include:

- Reiterate the Group's commitment to non-tolerance of illegal activities.
- Establish measures for the prevention and detection of crime.
- Maintain effective communication and awareness-raising mechanisms for all members.
- Develop a business culture based on ethics and compliance.

Antitrust Policy:

ACCIONA Energía's Antitrust Policy establishes the principles of conduct that the organisation must observe when competing in the market and interacting with customers, competitors and suppliers. In this way, ACCIONA Energía aims to avoid breaches of antitrust regulations and to facilitate, where appropriate, their early detection and appropriate management.

The purpose of this Policy is to disseminate the general principles governing this matter in order to:

- Raise awareness of the organisation's members and facilitate compliance with internal and external antitrust regulations in all countries and jurisdictions where ACCIONA Energía operates,
- Promote the establishment of adequate controls and procedures within ACCIONA Energía, and
- Actively cooperate with the competent authorities to eradicate anti-competitive behaviour.

The principles of action set out in the Policy Book have been developed on the basis of international standards and have been implemented in the organisation through the development of complementary corporate regulations and instructions that regulate aspects including: donations and sponsorships, selecting partners and hiring business consultants, interacting with public officials, gifts and hospitality, international economic sanctions, antitrust compliance, prevention and management of conflicts of interest, recruitment and ACCIONA Energía Bonus.

The Policy Book is publicly available and applies to all companies in which ACCIONA Energía has a majority shareholding, exercises control or has management responsibility, regardless of their geographical location, as well as to directors and members of the organisation regardless of their position. In companies in which ACCIONA Energía has a stake, and which it is not responsible for managing, it will be the organisation's representatives on the administrative and management bodies who will promote

their adoption. ACCIONA Energía will reject any conduct contrary to these principles by third parties with whom it has dealings and will encourage them to adopt them to the extent that it has influence.

The Code of Conduct, the Policy Book and the Anti-Corruption Guidelines, among others, must be read and accepted by all members of the organisation (including those with higher risk functions). In addition, the organisation has a training and communication programme aimed at reinforcing a culture of ethics and integrity in the Group (more detail on training and higher risk functions in section G1-3).

Likewise, through its Policy Book, ACCIONA Energía promotes the establishment of a culture of integrity, transparency and ethics in all its operations, establishing clear mechanisms to guarantee compliance with current legislation and the protection of both members of the organisation and its stakeholders (including customers, suppliers and society at large).

In addition, ACCIONA Energía makes the Ethics Channel available to all its members, as well as to any third party, for the reporting of any wrongdoing or conduct contrary to the legal framework in force, the Code of Conduct and/or ACCIONA Energía's ethical values.

The content and application of the specific Policies included in this section is monitored by the Compliance Division as part of the CPACM's operational and continuous improvement processes. For its part, the Internal Audit Division carries out supervisory processes based on the risks and controls associated with them.

Ethics Channel

ACCIONA Energía has an internal reporting system called the Ethics Channel, available for any individual to report to the Ethics Channel Committee any wrongdoing, breaches or misconduct related to ACCIONA Energía's activities that may be considered to be contrary to the Group's current legal framework, their Code of Conduct, and/or ethical values.

Possible ways of reporting through ACCIONA Energía's Ethics Channel are:

- (i) in writing, through a web form available at <https://canaletico.ACCIONA Energía.com> or by post; and
- (ii) verbally, through a voice file that can be attached to the web form or through a face-to-face, videoconference or telephone meeting with a representative of the Ethics Channel Committee (or, where appropriate, with members of its team that may be designated), upon the whistleblower's request made through the aforementioned channels.

In this regard, although the online communication channel (web form) is common to the entire ACCIONA Group, the communications sent through it are automatically segmented, guaranteeing independent and confidential management by the Ethics Channel Committee in relation to communications concerning ACCIONA Energía.

The Ethics Channel is managed by the Ethics Channel Committee, a body made up of members of particular relevance in matters relating to ethics and compliance within the ACCIONA Energía Group, with 80% women and 20% men.

Access to complaints reported through the Ethics Channel is restricted to the Ethics Channel Committee, a body whose functions include, among others:

- Facilitate a communication channel for all members in the Organisation, and for third parties too, not only to gather and provide information on the compliance with the Code of Conduct, but also to manage the complaints and queries received and thus facilitate the coordination of their resolution and follow-up.
- Manage the Ethics Channel based on the principles of guaranteed confidentiality, respect for the anonymity of persons who do not wish to identify themselves, no retaliation against whistleblowers who report in good faith, impartiality and objectivity, and respect for the rights of all parties involved in the inquiries.
 - Confidentiality: ensuring the confidentiality of the whistleblower's identity is a guiding principle in the management of the Ethics Channel. The persons entrusted and designated to receive and process complaints, as well as to implement the measures resulting from the processing of the complaints, have an obligation to keep the identity of the whistleblower and of the person affected by the complaint made strictly confidential.
 - Anonymity: the Ethics Channel can be used for making anonymous complaints. Therefore, it is strictly prohibited to undertake or fail to undertake any actions with the aim of revealing the whistleblower's identity when he/she has opted to remain anonymous.
 - Non-retaliation: whistleblowers who report wrongdoing in good faith may not be penalised or suffer any negative consequences or retaliation for lodging their complaints. This guarantee of non-retaliation extends to persons associated with the whistleblower, to natural persons assisting the whistleblower during the lodging and processing of the complaint, as well as to the legal representatives of the employees in the exercise of their duties of advising and supporting the whistleblower.
- Review all complaints received through the Ethics Channel and determine the methodology to be used in processing and investigating them.
- Report regularly to the Board of Directors, through the Audit and Sustainability Committee, on any complaints reported and their resolution.

During 2024, improvements were made to adapt the Ethics Channel to the requirements established in the applicable regulations. These changes have been substantiated in the development of a Regulation of the Ethics Channel Committee and in the update of the [Ethics Channel Policy](#) and the Ethics Channel Complaints Handling Procedure, which was approved by ACCIONA Energía's governing body.

TYPE OF COMPLAINTS RECEIVED THROUGH THE ETHICS CHANNEL

The Audit and Sustainability Committee has supervised the activity carried out by the Ethics Channel Committee, receiving information on cases being handled and those processed in 2024, in which a total of 39 complaints were reported through the Ethics Channel, categorised as follows:

TYPE	NUMBER OF COMPLAINTS
Harassment at work	
Sexual harassment	
Gender-based harassment / discrimination	
Working conditions	2
Interpersonal conflicts / misconduct	26

Conflicts of interest	
Money laundering and TF	
Corruption or fraud	
Asset management	
Environment	
Customer privacy (Data Protection Law)	
Other (*)	11

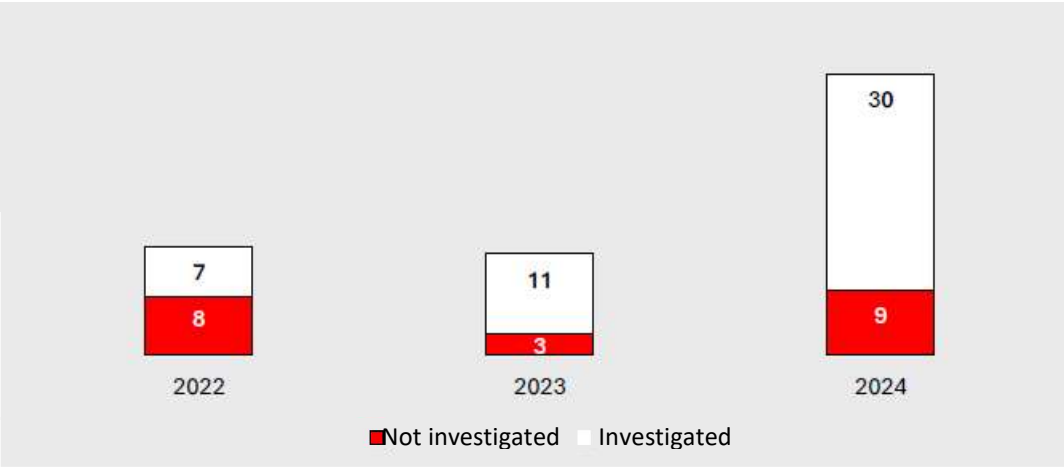
(*) Includes communications on matters outside the scope of the Ethics Channel, facts not proven and complaints about invoices/commercial complaints.

The number of communications has increased by 178% compared to 2023. This increase is mostly due to the volume of current projects in progress and improved awareness and confidence in the Ethics Channel.

There were no complaints referring to giving or offering bribes or any other type of remuneration or similar consideration, to any individual or public or private entity for the purpose of illegally obtaining or retaining a business or a competitive advantage for the Group. Nor have any notifications been received relating to tax issues.

PROCESSING OF COMPLAINTS

Of the 39 complaints received, it was agreed that 30 cases would be investigated, 9 by an external investigator and 21 by an internal investigator.



DISCIPLINARY MEASURES

As a result of the investigations carried out, the Ethics Channel Committee has proposed the taking of various measures aimed at reinforcing the culture of ethics and compliance, such as training plans, coaching plans, process reviews and dismissals.

Anti-money laundering measures

As for money laundering, all ACCIONA Energía members are required to pay special attention to any circumstances revealing a lack of integrity of the persons or entities with which the company maintains a

business relationship. Cash payments are not allowed, other than in exceptional cases, with express authorisation and with traceable documentary evidence. In addition, ACCIONA Energía monitors cash payments and due diligence procedures with suppliers and business partners that form part of the CPABM.

On top of that, a money laundering prevention course is available to all members of the organisation in the Workday learning module.

[G1-2] Management of relationships with suppliers

SUPPLY CHAIN GOVERNANCE

ACCIONA Energía's Supply Chain management is responsible for defining, executing and monitoring the responsible supplier management strategy, following the strategic framework defined in the Sustainability Master Plan 2025 (SMP) on supply chain management, as well as the Supplier Management Guide and related documents. This strategy includes the coordination and monitoring of ESG management for suppliers, aimed at reducing their environmental, social and governance risks and improving their performance in these areas. This includes external audits of procurement processes and strategic suppliers in risk countries, or those that exceed an annual cumulative contracting volume.

To this end, it has a specific Supplier Management area integrated in the transversal services team that also provides services for other issues such as sustainability, implementation and improvement of systems, control, reporting and processes, such as sustainable purchasing, but which in no case carries out procurement in order to avoid conflicts of interest.

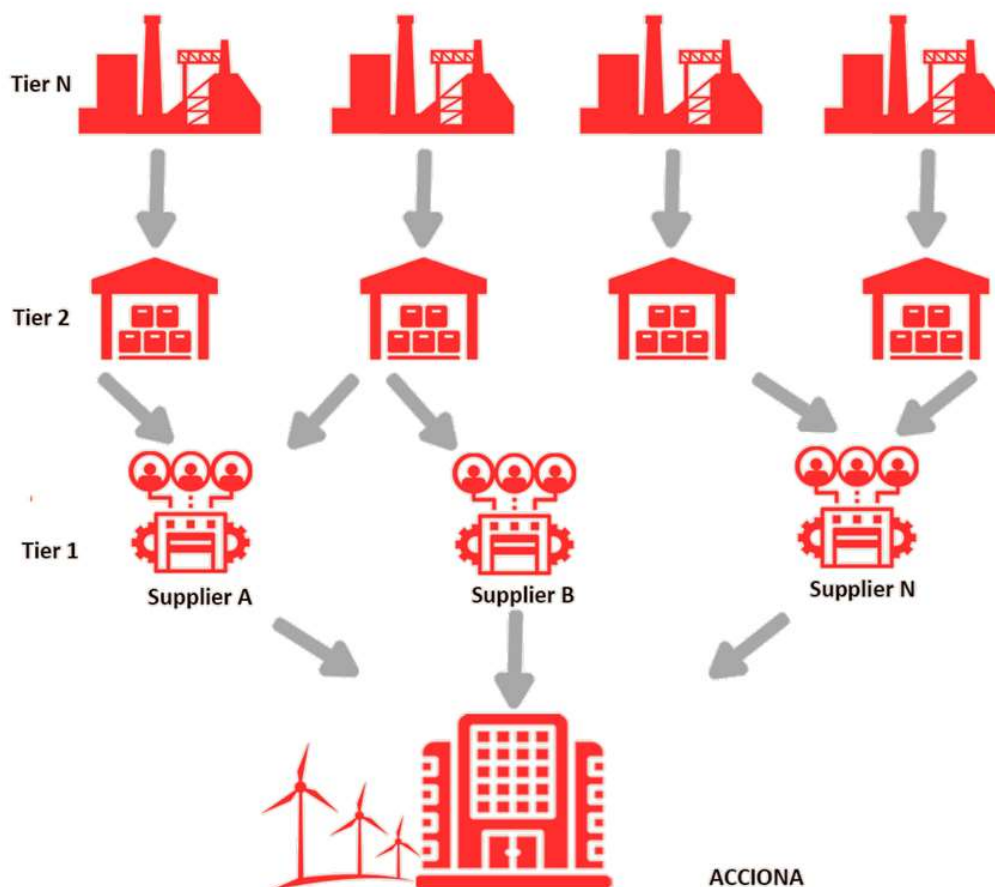
To ensure a sustainable approach throughout the supply chain, 100% of Supply Chain employees have targets linked to the Sustainability Master Plan. In addition, they have available to them courses aimed at promoting sustainability, compliance, equality, harassment awareness, diversity and inclusion, corporate social responsibility and sustainability in the supply chain, transparency and good governance, information security, health and safety, anti-corruption and anti-bribery and human rights training, etc. with a total of 201 courses taken by 94.4% of the department's staff.

Finally, there is the supervisory function of the Board's Audit and Sustainability Committee, which reviews the company's main ESG indicators, including audited suppliers and Non-Go suppliers. The committee also supervises compliance with the Sustainability Master Plan and monitors the follow-up of the different controls in the supply chain and supplier development programmes.

Contracts between ACCIONA Energía companies and ACCIONA Group companies are regulated by an internal procedure for information, control, approval and reporting, which is managed by the Internal Code of Conduct Compliance Unit, which in 2024 maintained the operations for the control of intra-group commercial transactions in order to ensure compliance in terms of equal market competition and transparency, thus protecting the minority shareholder.

SUPPLY CHAIN MANAGEMENT STRATEGY

ACCIONA Energía is committed to leading the development, knowledge and control of its supply chain, focusing on social responsibility, ethics and transparency of the procurement process. Market requirements and regulations generate the need for traceability throughout the supply chain, from the origin of the materials to their use by ACCIONA Energía.



The strategy for supply chain management is mainly marked by the projects for the **construction and operation** of renewable energy facilities. The processes are integrated in the ERP, the procurement management tool, the tendering tool, the contract drafting and signing platform and the supplier management platform, both for approval and audit control.

The procurement process, described below, includes environmental, social and governance (ESG) standards and ensures transparency in the procurement process.

When an ACCIONA Energía user needs a supply or service, the request is made through a tool that sends this need to the PROCUR-e procurement tool, which is registered and traced at all times. In order to ensure transparency, procurement tenders are carried out on the existing platform, where each buyer configures the RFP in such a way that the defined evaluation and award criteria and characteristics are automatically applied.

The buyer must invite at least 3 suppliers for each tender (except for so-called exceptional purchases which are perfectly defined). All suppliers wishing to participate in tenders must be classified according to ACCIONA Energía's own Classification System, for which they must complete the registration in the systems as indicated in the Contractor Profile <https://contractorprofile.accion-energya.com>.

In addition, tenders exceeding €400,000 are published in the contractor's profile where the contracting conditions, award criteria and their weighting are made public.

Once the bids have been received, the applicants assess the technical bids and may disqualify those that do not meet the required technical level, duly justifying the reasons for disqualification. The economic

negotiation process will be conducted by the Supply Chain department, on equal terms for all suppliers whose technical bid has been approved and who have passed the technical rating where required.

The company's practices regarding payments to suppliers and policies to avoid late payments, in particular to SMEs, are described in section G1-6 of this Sustainability Report.

ACCIONA Energía has established that at least the following weighting factors will be taken into account in the evaluation of bids:

	SERVICES	PRODUCTS
Financial proposal	50%	50%
ESG/Sustainability Scoring	10%	10%
Security	20%	-
After-sales service	-	5%
Quality	10%	15%
Technical Bid	10%	20%

The result of the evaluation and award of tenders will be communicated to suppliers. To this end, the award will be published in the Contractor Profile, in those cases where the tender has been announced.

Type of suppliers

ACCIONA Energía's purchase categories with a higher volume of expenditure are wind turbine components, photovoltaic panels and structures, Balance of Plant (BOP) construction services and maintenance services for facilities in operation. The latter can be delivered locally, especially non-specialised services.

Specialised services can only be provided by technicians, although ACCIONA Energía promotes local specialists. With regard to supplies, large components and some small spare parts can only be manufactured by offshore companies due to their specific nature.

	Total no.	National / Local	International	Strategic
Suppliers	3,415	3,254	412	333

Local suppliers

ACCIONA Energía prioritises the hiring of local suppliers in order to have a positive impact on the economic development of communities. 88.8 % of the companies or means of distribution contracted are national.

International suppliers

When entering new countries, difficulties arise in finding a portfolio of national/local suppliers that meet ACCIONA Energía's requirements. This requires prospecting the market and encouraging suppliers to adapt to ACCIONA Energía's ESG culture, which is not always achievable. National or local procurement

is sought at all times, although international procurement is sometimes unavoidable, accounting for 11.2% of suppliers.

Strategic Suppliers

These are those with an annual business relationship of more than €400,000 in 12 months.

Origin of supplies

In 2024, the amount of local purchases represented 89.5% of the purchase volume compared to 68% in 2023. This represents a 21.5% increase in the percentage of local purchases.

	National / Local	International
Volume of purchases €M	1,548	181
% amount of purchases	89.5%	10.5%

When entering new countries, difficulties arise in finding a portfolio of national/local suppliers that meet ACCIONA Energía's requirements. This requires prospecting the market and encouraging suppliers to adapt to ACCIONA Energía's ESG culture, with the effort that this requires. National or local procurement is sought at all times, although international procurement is sometimes unavoidable.

MANAGING SUPPLY CHAIN IMPACTS, RISKS AND OPPORTUNITIES

The main risks in ACCIONA Energía's supply chain are:

- Non-compliance by suppliers with ACCIONA Energía's standard conditions.
- Contracting of suppliers that present financial or ESG risks in any of their areas.
- Contracting of suppliers not technically valid for the provision of the service or supply of the product.

The mitigation measures for these risks are:

- General Terms and Conditions included in all orders/contracts, including ESG risks: anti-corruption and bribery, data protection, health and safety, environmental protection, human rights, etc.
- Any third party supplying goods or services to ACCIONA Energía must be registered in the systems enabled for this purpose. A number of "supplier statuses" have been defined, which are reflected in both GoSupply and ERP. This categorisation limits the relationship with the supplier, as well as the contracting and type of order.

- Validation by the technical units of the requesting departments that the supplier meets the technical requirements.
- Conducting ESG audits and audits of operations processes.

Contracting of the supply of materials or the provision of services necessary for the activity of all ACCIONA Energía companies seeks to optimise the Quality-Price-Term ratio, include environmental, social and governance (ESG) standards, guarantee the transparency of the award processes, achieve economies of scale and transfer ACCIONA Energía's policy to the supply chain in a unified manner.

SUPPLIER RISK CONTROL AND RISK MAP

Since 2022, ACCIONA Energía has been incorporating GoSupply as a platform for validating and calculating the risk map of all suppliers. This allows for a broad understanding of the supply chain in different areas, especially in ESG-related areas. During 2023, having verified that this system improves the control of the supply chain with respect to the systems previously mentioned, all the countries in which ACCIONA Energía operates have been incorporated into this platform, managing to consolidate the system. In 2024, the system will be implemented globally and those countries in which ACCIONA Energía has started new activities, such as the Philippines, will have been incorporated.

The use of this platform enables international standards to be met throughout the procurement process. For this, it applies the different parameters defined by ACCIONA Energía to ascertain the supplier's global risk, compiling data directly from various external sources, studying both suppliers and their partners, the parent company -if any- subsidiaries, majority owners and related companies, and analysing the questionnaire answered by the supplier to ascertain compliance in the matters analysed.

The entire supply process has been audited by an external entity (Bureau Veritas) for the validity of the ISO 9001 Quality Management System, ISO 37001 Anti-Bribery, ISO 45001 Occupational Health and Safety Management Systems, and ISO 14001 Environmental Management certifications, passing them with 0 non-conformities. Observations and opportunities for improvement that arise during these reviews are analysed and considered with the aim of maintaining continuous process improvement.

In 2024, the ACCIONA Energía Supplier Management Guide was maintained, which includes the risk map based on scores obtained from the GoSupply tool. The contents of the contracting conditions to be used in tenders in which suppliers participate have also been continuously reviewed.

RISK CONTROL THROUGHOUT THE SUPPLIER LIFE CYCLE

Throughout the life cycle of the relationship with the supplier (from the moment it expresses its intention to become a supplier until the end of the relationship with the company), various control activities are carried out to ensure ACCIONA Energía's due diligence in the relationship with the supplier and the promotion of sustainability in the supply chain:

Before deciding to contract with the supplier/contractor:

- A. Registration and administrative approval
- B. Technical rating (according to the type of product/service)

Once the relationship with the supplier/contractor has begun:

- C. Supplier performance assessment

Before, during and after contracting with the supplier/contractor:

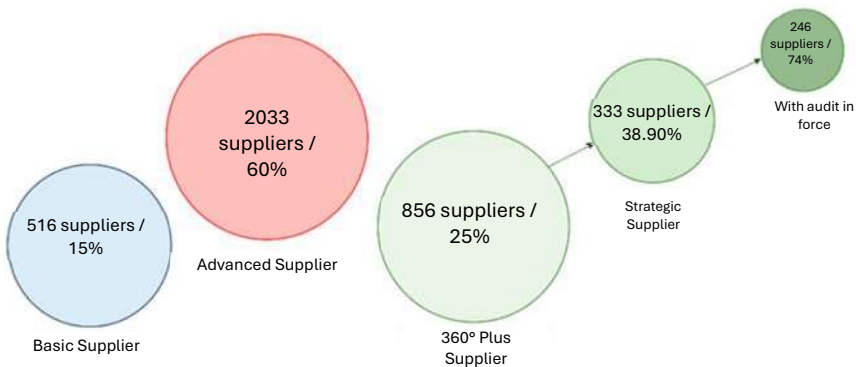
- D. Visibility and transparency in the supply chain
- E. No-Go Policies
- F. Training for suppliers

100% of suppliers go through the company's risk control process, which is increasingly exhaustive depending on various factors, especially the annual procurement amount with the ACCIONA Group, but also other factors such as the criticality of the service or supply provided for the company's activity or other factors such as country risk. As the risk or relevance of any of these factors increases, the level of control and scrutiny to which the supplier is subjected increases.

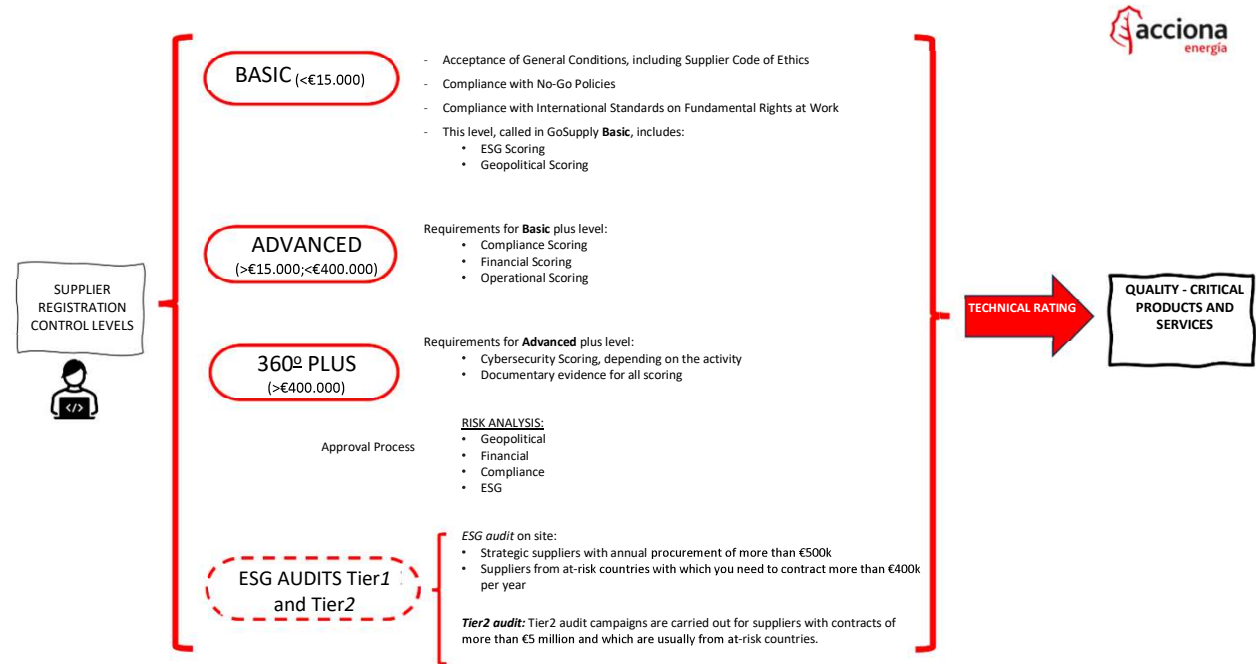
A. REGISTRATION AND ADMINISTRATIVE APPROVAL PROCESS

In 2024, we worked with a total of 3,415 suppliers, a similar number to 2023, with a purchase volume of €1.73 billion, 4.7% lower than the previous year. These suppliers are segmented into tiers according to their annual cumulative amount.

- 15% of suppliers worked with are in Basic status in GoSupply, with a cumulative annual procurement amount of less than €15,000 per year. - Suppliers in this status account for 0.41% of the year's purchases.
- 60% of suppliers are in the Advanced level in GoSupply, in the segment with a cumulative annual amount of between €15,000 and €400,000. - Suppliers in this status account for 8.2% of the year's purchases.
- The last 25% of suppliers are in the 360° Plus level in GoSupply, with current or planned procurement of amounts greater than €400,000. - Suppliers in this status account for 91% of the year's purchases.



The contents of each of the control activities carried out are detailed below:



A1. Responsible Suppliers Declaration

100% of suppliers accept, by registering with GoSupply (before participating in any tender), the ACCIONA Group's Statement of Compliance, which is also accessible and published in the Contractor Profile for consultation prior to registration (<https://contractorprofile.accion-energia.com>).

This document includes the recommendation to adhere to the United Nations Global Compact, and makes explicit reference to suppliers' recognition of ACCIONA Energía's Code of Conduct and ACCIONA Energía's Ethical Principles for Suppliers, Contractors and Collaborators.

Ethical Principles for Suppliers, Contractors and Collaborators

ACCIONA Energía has a code of conduct for suppliers, contractors and collaborators that establishes the principles of conduct in terms of transparency and business ethics, human rights, health and safety, quality and the environment so that suppliers, contractors and collaborators carry out their activities in coherence with the guidelines for conduct described in the Company's Code of Conduct and Policy Book.

ACCIONA Energía's objective is to extend its commitment to business ethics, respect for human rights and environmental protection to suppliers, contractors and collaborators²¹ in order to establish stable and lasting business relationships of cooperation, based on honesty, transparency and trust, to prevent or minimise the risk of human rights violations, to ensure regulatory compliance, particularly in matters related to ethics and integrity in business conduct, and to reduce the company's environmental footprint. All of this by guaranteeing the supply of goods and services.

²¹ Of any type of business, whether it is a company, partnership, joint venture, etc.

The Ethical Principles for Suppliers and Contractors set out the following requirements for suppliers:

Transparency and Ethics

- Legal compliance
- Compliance with international ethical and transparency standards
- Acting with integrity and transparency
- Respect for confidentiality
- Ensuring the protection of personal data
- Rejection of corruption and bribery

Human Rights

- Respect for human rights as defined in the internationally recognised standards.
- Non-discrimination.
- Prohibition of forced labour.
- Prohibition of child labour.
- Respect for freedom of association, unionisation and collective bargaining.
- Fair labour practices.
- Adequate working conditions.
- Compliance with working hours.
- Promotion of diversity and inclusion.
- Respect for the communities in which it operates.
- Respect for the conditions of migrant workers.

Health and Safety

- Provide its workforce with a safe and healthy workplace with adequate facilities and conditions.
- Have preventive measures in place to avoid risks at work, and responses to emergency situations.
- Train its workforce to be aware of these measures and to apply them, ensuring their safety and the safety of others.

Quality and Environment

- Have an effective environmental policy and comply with environmental legislation
- Maintain a precautionary approach and encourage initiatives that promote greater environmental responsibility
- Design production processes that make efficient use of available resources and that prevent or minimise environmental impact
- Encourage the development and dissemination of environmentally friendly technologies
- Provide effective systems for the identification, monitoring and treatment of major environmental impacts
- In the event of environmental damage, use all necessary means to restore the previous situation

ACCIONA Energía requires its suppliers, contractors and collaborators to have quality and environmental policies that guarantee respectful and sustainable environmental actions. These principles are applicable to all suppliers, contractors and collaborators of ACCIONA Energía companies.

Available at: [ACCIONA Energía website](#)

These Ethical Principles are disseminated through the Statement of Compliance which all suppliers, contractors, or collaborators must complete during their registration on the PROCUR-e procurement platform and the GoSupply supplier registration platform. This form includes confirmation of their acceptance and commitment to compliance with the Code of Conduct and the Ethical Principles. These principles are also available in the Contractor Profile.

In addition, it has been established that in the event of non-compliance, solutions must be promoted, either through improvement plans or special conditions in the orders that mitigate risks and help the supplier to improve in the necessary area.

International Standards on Fundamental Rights at Work

By registering on the GoSupply supplier platform, the supplier agrees to comply with the 6 basic human rights standards. Additionally, when it submits the questionnaire, it ticks a self-declaration box indicating that all the information it is providing in the questionnaire is truthful and verifiable.

These standards take into consideration the following points:

- Freedom of association and collective bargaining.
- Prevention of discrimination (based on sexual orientation, age, gender, marital status, level of education, political, ideological or religious beliefs, social origin or status, physical or intellectual ability).
- Prevention of unacceptable disciplinary practices based on corporal punishment, physical or mental coercion, verbal abuse, harassment, workplace abuses of any kind or unfair wage deductions.
- Guarantee that the recruitment procedure is fair and provides a living wage for all workers.

- The company considers and takes into account national regulations and is in line with industry standards regarding working hours.
- Guarantee not to engage in or benefit from any form of child labour.

Through orders, contracts and tender documents, clauses are also incorporated relating to:

- Ethical principles for suppliers and communication channel
 - Confidentiality
 - Prevention of occupational hazards
 - Prevention of smuggling
 - Environmental obligations
 - Information security
 - Data protection.

All of ACCIONA Energía's orders and contracts have specifically incorporated these clauses

	No.	%	Amount €M	%
Contracts with ESG clauses	53,026	100%	1,729.8	100%

ACCIONA Energía reserves the right to terminate the contractual relationship with those suppliers, contractors and/or collaborators who fail to comply with the aforementioned principles.

A2. Scores applicable to the supplier

Once the supplier has completed the Statement of Compliance, it is assigned a registration level in GoSupply depending on the procurement amount. Depending on the registration level, a series of scores are assessed to evaluate the risk of the supplier. These scores are:

- **Financial Score:** is obtained from third party sources, such as Iberinform or Dun & Bradstreet, or from the balance sheet provided by the supplier in the 360° Plus registration level.
- **Cybersecurity Score:** is calculated from a series of questions that the supplier must answer based on its activity in the 360° Plus registration level, related to possible security breaches, measures in place to prevent cyber-attacks, cybersecurity policies, certifications, etc.
- **ESG Score:** includes a specific questionnaire for each of the ESG branches:
 - Environmental: includes questions related to quantification and reduction of emissions, waste management, sustainable products or packaging, ecological impact and possible environmental sanctions.
 - Social: compliance with International Standards on Fundamental Rights at Work, quality of employment, relationship with local communities and possible related sanctions are analysed.

- **Governance:** the opportunity is offered to provide sustainability policies or certifications (including the Sustainability Report, if any), policies or certifications on the prevention of corruption, bribery or fraud, the Code of Conduct and possible sanctions or fines in related matters.
- **Score Compliance:** analyses the supplier's position with respect to matters like money laundering, tax havens, corruption lawsuits, presence on international sanction lists, etc., both of the supplier and of its stakeholders.
- **Operational Score:** includes health and safety related questions, reflects supplier accident data and offers the possibility to provide Quality and Environmental certifications.
- **Geopolitical score:** is generated from various indices extracted from Maplecroft and GoSupply such as corruption, human rights, environmental legislation, natural disasters, labour conditions, armed conflicts, socio-economic status, credit rating and tax haven.

For suppliers with procurement levels of less than €15,000/year, a Basic level registration on the GoSupply platform is required. This level contains the Geopolitical control score and the ESG control score. This status implies:

- Acceptance of the Terms and Conditions of the platform, and the aforementioned Responsible Suppliers Declaration
- No Go Policy Compliance
- Compliance with International Standards on Fundamental Rights at Work

For suppliers with procurement levels above €15,000/year and below €400,000/year, the next level of registration, called Advanced, is requested. In addition to the above, this statement includes the Compliance score, the Financial score and the Operational score.

The next level of registration, requested for strategic suppliers, those with annual procurements above €400,000, is called 360° Plus. In addition to the previous levels, this status incorporates a Cybersecurity score, depending on the supplier's activity, and documentary evidence for all other scores. This allows for a better analysis of the information provided by the supplier, while facilitating control over the most strategic suppliers, whether by recurrence, by country of risk or by procurement amount.

A3. Supplier approval

In addition to the registration level, strategic suppliers (awarded more than €400,000 in the last twelve months), require approval, which involves a more exhaustive analysis of all scores. Among other points, compliance with international human rights standards, the supplier's integrity, financial solvency, etc. are once again verified. In addition, minimum requirements are established in the scores in order to proceed with this approval:

Geopolitical risk	Low or Medium
Financial	> 60 points or compliance with the requirements set by the Economic-Financial Division.
Compliance	> 60 points
ESG	> 40 points

A4. ESG audits

The next level of supply chain monitoring is **ESG audits**. On-site audits of purely ESG aspects are carried out by an independent third party on strategic suppliers with an annual procurement amount of more than €500,000 and on suppliers based in countries considered risky with procurements exceeding €400,000/year.

Finally, a last supply chain control is established, consisting of tier 2 supplier audit campaigns of equipment suppliers with contracts exceeding €5M. The successful tenderer must provide a list of suppliers that account for 80-90% of the total expenditure of the supply contract with ACCIONA Energía, to be audited by third parties. These campaigns began in 2018 and have been ongoing annually, increasing the number of suppliers year after year.

Outcome of audits and resolution of non-conformities

ACCIONA Energía conducts audits through third-party auditors to verify the ESG assessment of its suppliers.

The GoSupply platform incorporates, in addition to the general questionnaire, an audit module that facilitates the follow-up of the resolution of detected non-conformities. Following the merger of GoSupply with Achilles, GoSupply remains as the supplier registration platform, where the audits performed by Achilles for ACCIONA Energía will be available throughout 2025. This benefits both suppliers and ACCIONA Energía in terms of monitoring and reporting on a single platform.

Monitoring audits of strategic suppliers have been carried out since 2013. In 2024, 171 were conducted, 155 of them on direct strategic suppliers, that may pose a risk to the business or simply because they are a strategic supplier in a risk country (China or India).

Of the latter percentage, 333 strategic suppliers have exceeded the cumulative amount of €400,000. 246 of them, or 74%, have a mandatory audit in force.

If serious non-conformities are identified in these audits, according to the ESG audit protocol, an improvement plan must be established until they are resolved.

ESG audit findings

ESG audits generate a series of findings that allow both the supplier and ACCIONA Energía to assess the company's situation and work together on areas for improvement, as well as to strengthen the areas in which they stand out. The findings are divided into:

- **Serious Non-conformities:** these are generally legal non-compliances or essential requirements for ACCIONA Energía, for which a closure period of 3 months is given, extendable if it can be demonstrated that active efforts are being made to resolve them and provided that they do not violate any of the principles set out in the No Go Policies.
- **Minor Non-Conformities:** are partial violations of a requirement that do not pose a significant risk or are not a legal requirement.

- **Opportunities for improvement:** findings that, while meeting the legal requirement, could improve the supplier's performance.
- **Positive elements:** are areas in which the organisation performs above regulatory requirements or the industry average.

Audits of tier 2 suppliers ensure a more complete understanding of the supply chain and mitigate potential or actual risks. By the end of 2024, 16 audits had been carried out on the three tier 2 strategic suppliers of cables and transformers. The countries in which such audits have been carried out are:

Country	No. tier 2 audits	%
China	13	81.25%
Spain	2	12.50%
Germany	1	6.25%

It is also worth mentioning that a new tier 2 audit campaign of another strategic cable and transformer supplier was launched at the end of 2024, to be carried out and reported on in 2025.

Resolution of Serious Non-Conformities

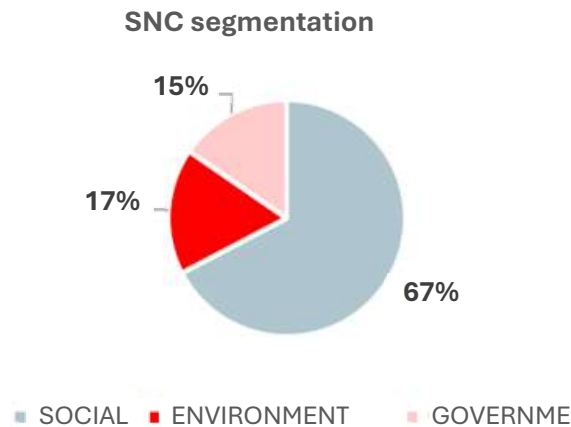
ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. If the serious deficiencies detected cannot be resolved within a reasonable period of time, the company is marked as No-Go. This contributes to significantly minimising supply chain risks.

Focusing on the Non-Conformities of the 155 direct suppliers audited in 2024, the following is worth noting:

- 64% of the audited direct suppliers had no Serious Non-Conformities.
- The remaining 36%, which did have Serious Non-Conformities, have followed the various action plans proposed at the end of the audits. Of this percentage, 68% had totally resolved their SNCs at the end of 2024.

With regard to suppliers from countries at risk, both tier 1 and tier 2, 22 suppliers from China and India were audited, and only 4 of them had Major Non-Conformities.

Regarding the segmentation of Serious Non-Conformities:



- 67% of the SNCs obtained belong to the Social area, mainly related to occupational risk prevention, the need for specific policies to comply with International Standards, non-compliance with the Disability Act or the creation of mechanisms to control working hours.
- 17% of the SNCs obtained are grouped in the area of Environment, mostly related to licensing, waste management and segregation or emission control.
- The remaining 15% of the SNCs relate to the area of Governance, mainly to the need for the development of information protection policies or the lack of an accessible whistleblowing channel.

ACCIONA Energía is aware that insisting on the resolution of the Non-Conformities detected during audits is a great opportunity to help its suppliers to improve as companies, mitigate the risks associated with the supply chain, contribute to increasing performance and generate shared value.

ESG audit protocol

Audits conducted under the above assumptions follow an ESG-only protocol. The protocol used consists of 15 sections grouped into 3 disciplines: Environment, Social Aspects and Governance and Business Processes:

- **Environment:** includes sections such as licensing, environmental management, biodiversity and measures to combat climate change.
- **Social Aspects:** contains areas such as community relations, working environment, human rights compliance, business process improvement and occupational health and safety.
- **Good Governance and Business Processes:** includes all aspects related to transparency in fiscal reporting, business ethics and integrity, information security, business continuity, supply chain due diligence, and brand and reputation.

Additionally, ESG audits include on-site worker interviews to verify documentation and information directly with the supplier. Specific questions are also included to analyse the traceability of the products supplied by the supplier.

On-site audits are essential to prevent and detect human rights violations at suppliers, especially in high-risk countries where labour regulations and human rights standards may be more difficult to monitor remotely.

This type of audit allows for a direct and detailed assessment of working conditions, compliance with local and international regulations, and the identification of possible abuses, harassment at work, such as forced labour or child labour. In addition, they promote transparency, improve trust with suppliers and ensure effective implementation of corrective measures.

Enhanced Due Diligence (EDD)

When potential human rights violations are identified in the supply chain, it is essential to carry out Enhanced Due Diligence (EDD) to rigorously assess the situation and the implications of such findings.

This process allows for the identification of the magnitude of violations, their root causes and the parties involved, facilitating the implementation of appropriate corrective measures. This process reinforces the company's commitment to ethics and social responsibility, ensuring that the fundamental rights of workers and affected communities are protected.

EDD case in 2024

In the second quarter of 2024, an alert was received via GoSupply from a Bloomberg report, indicating that solar panels manufactured in China, suspected to have been made with polysilicon from Xinjiang province, are being smuggled into the US via India. As a result of the above, ACCIONA Energía activated its mechanisms to control, prevent and avoid any involvement with products manufactured through forced labour. The actions carried out were:

- On-site audit of potential suppliers from India involved.
- Audit of tier 2 suppliers of such suppliers.
- Request prior to contracting of the traceability of the materials supplied.
- Regular monitoring of India's suppliers of this type of material.

B. TECHNICAL RATING PROCESS

Suppliers of certain categories of services/supplies considered critical for the company's activity, in addition to passing the registration and administrative approval process described above, require an additional technical rating to determine their suitability for carrying out the specific work or supply.

In general, these critical services and supplies are those related to: construction, assembly of renewable generation assets and supply of their main components, such as civil works, wind turbine assembly, electromechanical assembly, substations, high-voltage lines, cranes, modular buildings, steel supply, concrete plant or geocomposites, among others. The complete list of supplies of critical goods or services, as well as documentation referring to the technical rating of suppliers are publicly available in the Contractor Profile (<https://contractorprofile.acciona-energia.com>).

In addition, special attention is also paid to contracts or supplies that affect the quality, environmental and safety performance related to the range of energy solutions offered by the company.

To be able to contract with the supplier, the supplier must pass a technical rating process carried out through GoSupply and supervised by the Quality, Occupational Risk Prevention and Environment Department. During this process, suppliers are required to answer a questionnaire divided into three sections: quality (Q), environment (E) and occupational health and safety (S). The supplier will receive a rating from 0 to 4 in each of the sections.

Standard contents of the rating questionnaire:

Environment	Health and Safety
<ul style="list-style-type: none">- Environmental certifications- Roles and responsibilities- Time and resources- Structure within the organisation- Competence and training- Environmental aspects/issues- Legal and other requirements- Legal status: permits and authorisations- Management of violations and sanctions- Work instructions- Management of hazardous substances- Coordination of activities- Potential emergencies- Environmental emergencies	<ul style="list-style-type: none">- Performance: Accident indicators. Frequency rate and severity rate of the supplier.- OHS management systems and certifications- OHS policy- Roles and responsibilities assigned- Competence, training and awareness- Risk identification- Legal requirements- Objectives and programmes- Information, communication, participation and consultation- Operational planning and control- Subcontractor management- Emergency preparedness and response- Monitoring, analysis and evaluation- System audit- Incident management- Non-conformity management- Good practices, safety and health- Road safety

This questionnaire requires certificates and evidence to support the answers provided, as well as a signed declaration by the person responsible regarding the veracity of the answers.



In some cases, if the product or service provider is deemed to pose a risk to the project or activity - in the opinion of the Quality, Occupational Risk Prevention and/or Environment departments - the Supplier Quality department may carry out a technical audit on site. At the end of the audit, ACCIONA Energía sends an audit report with comments and observations on possible improvements. The supplier will be requested to define the actions related to these observations and to proactively keep the company informed of progress.

Upon completion of the entire assessment process, a final rating will be awarded. Those with a lower rating (Q0/E0/S0) will be considered unacceptable and cannot be recruited; those with a minimum rating (Q1/E1/S1) will be accepted subject to the development of an action plan and up-skilling in order to be recruited. Those with an intermediate (Q2/E2/S2) to excellent (Q4/E4/S4) rating are considered acceptable and may be hired, although those with an intermediate rating must submit an improvement plan.

C. SUPPLIER PERFORMANCE ASSESSMENT

After contracting a supplier, ACCIONA Energía monitors the performance of the supplier or contractor in order to assess the supplier's suitability to continue working or work with ACCIONA Energía in the future.

ACCIONA Energía will continuously monitor the supplier's level of performance (Quality, Environment, Health and Safety) during the provision of the service or delivery of the supply and may re-evaluate suppliers and subcontractors by rating the service or product offered by the supplier to the company from Q0 to Q4.

At the end of the contract execution phase, the departments requesting the service/supply assess the performance of ACCIONA Energía's supply chain to obtain relevant data for future contracts.

The assessment is made according to criteria in relation to periods, occupational health and safety, quality, environment, fulfilling of administrative obligations and technical skills. In particular, the following are considered for each of these concepts (Quality, OHS and Environment): identified non-conformities, non-quality costs, environmental events or incidents, accident frequency and severity index, safety events or incidents, environmental or safety non-compliance, delays in deadlines, action in the face of delays, attitude and proactivity of the supplier.

During the course of 2024 753 assessments were carried out. 94% of those evaluations were type A or B (very recommendable or recommendable supplier). During 2023, a new evaluation model was designed to streamline the process, and in 2024 the appropriate tool for its implementation was found. This new assessment system will be implemented in 2025, as part of the evolution of the systems planned for that year.

D. VISIBILITY AND TRANSPARENCY IN THE SUPPLY CHAIN

Transparency and visibility are fundamental to the relationship between ACCIONA Energía and its suppliers, as they foster mutual trust, improve communication and optimise operational processes. When suppliers have clear, real-time access to information about their scores and improvement points, they can make more informed and effective decisions, reducing risk and improving service quality.

In addition, greater transparency allows ACCIONA Energía to detect problems early, facilitating collaboration with its suppliers to find solutions and strengthen commercial ties. In an increasingly competitive business environment, these practices not only improve efficiency, but are also key to building long-term relationships based on integrity and shared commitment.

To this end, ACCIONA Energía has implemented several mechanisms that allow it to have that conversation with its suppliers:

- **Visibility of GoSupply scores:** the GoSupply registration process generates scores that the supplier has full access to from its profile. This functionality allows the supplier, in addition to checking its own scores, to compare itself with other companies in its sector or activity and at country level.
- **Insights:** the GoSupply platform generates, based on the supplier's answers to the questionnaire, a series of suggestions for improvement to which the supplier has access. In this way, the supplier can strengthen the improvement of its internal processes and thus its scores.
- **Positive points derived from the ESG audit:** positive points are found from among the findings of the ESG audit, carried out on strategic or country risk suppliers. The supplier is aware of the results of the audit and therefore of its positive points. This knowledge allows it to strengthen and improve them.
- **Improvement Plans:** during 2024, work continued on the creation and implementation of a programme of improvement plans in GoSupply for those suppliers that do not meet the minimum required score in any of the scores, with special emphasis on the ESG score. Through the Improvement Plans Module, suppliers are encouraged to take specific actions to increase their scores and improve their performance in the relevant area.
- **Contractor profile:** (<https://contractorprofile.accionna-energia.com>), implemented in 2021, which promotes greater transparency through the publication of objective and measurable criteria to be met by ACCIONA Energía suppliers, including sustainability aspects for global use.
- **Ethics Channel:** through this mechanism, suppliers can report to ACCIONA Energía any malpractices detected, which will be duly analysed by the Ethics Channel Committee. (<https://canaletico.accionna.com>)
- **Two-way contact channels:** ACCIONA Energía also has direct contact channels with the Supplier Manager to resolve possible issues related to the business relationship through proveedores.energia@accionna.com and suppliers.energy@accionna.com, as well as with the buyers who interact with suppliers on a day-to-day basis.

E. NO-GO POLICIES

Failure to comply with the minimum established in the No-Go Policies means that a supplier may not be contracted until the reasons for being in such a situation have been solved. The ERP is parameterised to prevent contracting with suppliers who are in this status. ACCIONA Energía has met its 2024 SMP target of 0% of general purchase orders from companies with these breaches.

The No-Go Policies include the following situations:



- Suppliers with significant ethical and integrity risk, either because they are on international sanction lists or because they exhibit serious signs of corruption, fraud or money laundering.
- Strategic suppliers in at-risk countries that have not been audited, or that have been audited and have one or more unresolved Serious Non-Conformities.
- Demonstrated non-compliance with the United Nations Global Compact.
- Risk of economic solvency (from €1 M of contracting).
- Debts with the Social Security Institute or Tax Authorities.
- Companies penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

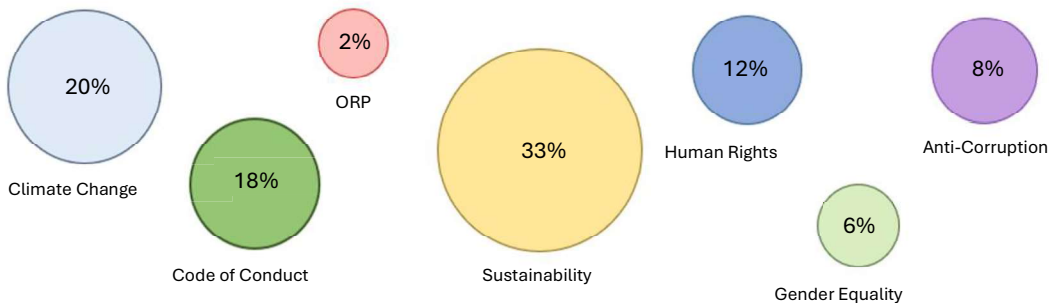
At the beginning of 2024, there was a history of 35 No-Go suppliers. During the year, 12 No-Go suppliers exited No-Go status and a total of 15 No-Go suppliers entered No-Go status, ending the year with a total of 38 No-Go suppliers.

Removal from this category is carried out following auditing, action or improvement plans, or Enhanced Due Diligence. The latter consists of an investigation into any adverse impacts detected, communication with the supplier to confirm the information, and verification of the resolution of the conflict prior to entering into any new contract.

In this regard, it should be noted that, during 2024, 11 suppliers that had entered No Go status for not closing their Serious Nonconformities on time, have managed to revert their status through the implementation of different plans and actions aimed at their resolution.

F. TRAINING FOR SUPPLIERS

Training suppliers on ESG (environmental, social, and governance) issues is crucial to ensuring that the entire supply chain meets responsible and sustainable standards. Providing them with specific training not only improves their practices and reduces risks, but also strengthens their competitiveness in an increasingly demanding market. It also fosters a culture of shared responsibility that benefits both companies and the wider environment and community.



The Corporate University Supplier Campus is integrated into PROCUR-e, available free of charge to 100% of the supply chain. Throughout the last financial year, 21 suppliers attended 49 courses out of those offered on the campus. The courses that have generated the most interest are those involving Sustainability, 33% of the total courses given.

In addition, for the second consecutive year, a Compliance Day was held with Mexican suppliers, this year incorporating 7 Dominican suppliers. The purpose of this event is to align and comply with ACCIONA Energía's internal regulations, strengthening legal and ethical compliance and the implementation of best compliance practices, as well as clarifying doubts to optimise processes. Some of ACCIONA's policies were explained, such as antitrust, crime prevention and anti-bribery, anti-corruption, code of conduct, conflicts of interest and compliance culture.

SUPPLY OF SUSTAINABLE PRODUCTS

ACCIONA Energía has maintained the criteria of the Sustainable Procurement Guide. The insertion of sustainability criteria is involved in all stages of the procurement process, from the selection of suppliers to the specification, evaluation of tenders and contract management. Sustainable procurement in 2024 amounted to €54,637,874.87, broken down as follows:

TYPE OF SUSTAINABLE PURCHASE	NO. OF SUPPLIERS	AMOUNT EUR
Social purchase	13	2,080,638.61
Carbon neutral	14	1,909,019.78
Herbaceous	147	23,873,391.45
Reconditioned material	121	26,701,139.58
Recycled/reused material	4	73,685.45
General total	299	54,637,874.87

In 2024, the amount of sustainable procurement represented 3.16% of the total procurement volume compared to 2.46% in 2023. The amount of sustainable procurement increased by 22.38% compared to 2023.

A new project to define sustainable products based on the preparation of standard data sheets was launched in 2024 and will be completed in 2025, addressing new criteria while studying the feasibility of implementing them in the systems.

In addition, in terms of decarbonisation, agreements have been maintained with some suppliers, such as three Chinese suppliers supplying power transformers and cables, a Spanish supplier also supplying cables, and an Australian supplier manufacturing rigid cable sheathing from recycled soft plastic. In addition, low-emission concrete has been used in Spain, and plastic waste from packaging (plastic oil bottles) has been reduced. All of this to collaborate jointly in reducing emissions by promoting the use of renewable energy, vegetable oils, and recycled materials.

In addition, initiatives have continued in relation to the reduction of greenhouse gas emissions from the supply chain, mainly based on the conclusion of long-term agreements or specific contracts with suppliers aimed at raising awareness of the measurement and reduction of the carbon footprint.

Furthermore, there has been particular emphasis on social procurement, such as the contracting of local suppliers with certifications in the USA, Veteran-Owned Small Business (VOSB), publicly registered in veterans.certify.sba.gov for the Engineering and Consulting for the tensioning of the Chalupa wind farm towers. Also the contracting of another local company in that country that has a Women Business Enterprise (WBE) Certification designed for companies that are 51% owned and managed by one or more



women in their specific state.

In South Africa, the contracting of a certified B-BBEE company (which assesses the compliance of companies aiming to improve black economic participation in the country), majority owned (52%) by black women, a previously disadvantaged group, seeks to redress economic inequalities and increase black participation in business ownership and management.

Additionally, suppliers affected by the DANA that occurred in Spain in October 2024 were given an impact mitigation plan, bringing forward the payment of invoices.

SUCCESS STORIES

RECYCLING OF BLADES FROM THE TAHIVILLA WIND FARM IN TARIFA, SPAIN

With the repowering of the Tahivilla wind farm, which involved the replacement of 98 old wind turbines with 13 latest generation ones, it became necessary to think about the recycling of the different components, one of the biggest challenges being the recycling of the blades due to their composition. This wind farm will recycle 100% of the blades from the old wind farm at the end of their useful life.

GRAZING PROJECT AT HIGH POINT (ILLINOIS), FORT BEND AND RED-TAILED HAWK (TEXAS) PV PLANTS, USA

The introduction of Dorper sheep at the Fort Bend, High Point and Red Tailed Hawk solar facilities allows the projects to become agri-voltaic facilities, a practice that optimises land use by combining renewable energy generation and agricultural practices. Dorper sheep, known to need little care, will graze on a rotational basis in the area, covering approximately 70-90% of the vegetation on the land. The grazing period extends from April to November and depends on weather conditions. The High Point solar plant, which covers approximately 500 acres (202 hectares), has introduced more than 450 sheep. The Fort Bend solar plant, which covers approximately 1,500 acres (606 hectares), will house up to 1,500 sheep. And the Red-Tailed Hawk solar farm in Texas, which covers approximately 2,800 acres (1,130 hectares), has introduced more than 2,500 sheep.

Sheep grazing on solar plants is a clear example of dual land use, providing both energy and agricultural benefits, coexisting in harmony. This initiative underlines ACCIONA Energía's commitment to integrating renewable energy production with sustainable land management.

REDUCING THE USE OF PLASTICS

The supply of rags for **O&M** work at ACCIONA Energía's assets in Mexico and Costa Rica is replaced by jute sacks (natural fibre), promoting the circular economy in the warehouses and helping to reduce the use of plastics.

Previously, packets of rags were received in 10 kg plastic bags; with the jute sack packaging initiative, 25 kg per sack is received (optimising packaging reduction). In addition, the warehouses recycle these sacks and return them to the supplier so that the next purchase is in a reused sack (these sacks can be refilled and used up to 4 or 6 times depending on the handling), thus eliminating the use of 2,500 plastic bags per year in both countries.

In the Logistics Operations department, as a sustainability initiative, the plastic packaging film has been replaced with stretch film produced with 70% post-consumer polyethylene, i.e., a 100% recyclable product with reduced environmental impact.

MILLION TREE PROJECT. ECONOMIC REVITALISATION OF THE MALEKU INDIGENOUS COMMUNITY, COSTA RICA

The APRENDE Y EMPRENDE (LEARN AND DO) project is related to a training plan for the Maleku indigenous community, which promotes the activation of this minority's economy through training provided in conjunction with a local company.

In 2023 ACCIONA Energía sponsored the planting of Achiote, a native plant for food consumption, which in 2024 was complemented with training given to the people of the Maleku community to enable them to market Achiote and acquire the knowledge to sell their products under the standards set by the Costa Rican Ministry of Commerce and the Ministry of Health.

SUPPLY CHAIN RELATED OBJECTIVES AND METRICS

The following is a summary of the sustainability objectives linked to the Supply Chain and their degree of compliance, all of which are linked to ACCIONA Energía's Sustainability Master Plan 2021-2025, which applies to all the countries in which the company operates.

The plan is structured around four fundamental pillars, based on which different objectives have been developed since 2021, and which in 2025 are as described below:

People-centric

- With the aim of being Diverse and Inclusive, it was proposed to promote equal opportunities by contracting Special Job Centres in Spain, with a target of €300,000 in 2025, having exceeded the target by having contracted 1,442,893.39 € (cumulative 2021-2024).
- As far as Transformative Environments are concerned, and bearing in mind that the aim is to achieve excellence in occupational risk prevention, a control of the Health and Safety rating of contractors was implemented prior to their inclusion in tenders, requiring 100% to be in the S2-S4 level, and improvement plans should be implemented to work in the S1 level. Compliance has been 100% with no need to contract suppliers in S1.
- In the section on Access to Rights, since 2021 the focus has been on suppliers, evolving the supplier approval procedure towards a more robust model in the sustainable dimension, with special compliance with social safeguards and the protection of people's rights.
- It has taken the form of:
 - 75 suppliers audited (95% in the case of countries at risk) was the target, which has been exceeded as 171 suppliers have been audited, 22 of which belong to countries at risk (China and India).
 - Follow-up of audit findings, 90% of which must have a Due Diligence or Improvement Plan, 100% of which must be completed.
 - TIER 2 audits representing 80% of the total contracted Tier 1 equipment, for equipment suppliers with contracts > €5 million. In this case 16 suppliers have been audited, all belonging to the same Tier 1.

Planet Positive

- In the block of climate-oriented objectives, work has been done on Scope 3 decarbonisation, focusing the strategy on two objectives:
 - Analysis of Scope 3 measurement in 4 main category suppliers, consisting of informing suppliers about the measurement and reduction of their emissions, promoting their decarbonisation plans and, where appropriate, accompanying them with this. The proposal has been exceeded, as 11 ACCIONA Energía suppliers now have a decarbonisation plan.
 - A study of alternatives to plastic packaging, in which it was decided to replace the plastic film used in logistics operations with one made from 70% recycled material.

Exponential leadership

- A first objective under the Governance heading consisted of the exhaustive application of ACCIONA's No Go policies, revised and extended in previous years, achieving yet another year in which no orders were placed with suppliers in that status.
- Under the Transparency heading, an objective has been developed consisting of providing information to suppliers on their ESG classification in ACCIONA's systems, which means that 98% of strategic suppliers must have access to this information. 100% of suppliers have been able to consult this information on the GoSupply platform.

Integrate to transform

- In the Local Ecosystems block, focused on the development of regenerative initiatives with suppliers, two objectives were pursued:
 - On the one hand, to promote the circular economy by having at least three suppliers join circularity initiatives, ultimately achieving a total of 7 suppliers.
 - On the other hand, as part of the promotion of sustainable procurement, a project has been launched to draw up sustainable product data sheets, to facilitate buyers and suppliers' identification of such status in products put out to tender.

Challenges for 2025 in supply chain management

- Continue to promote the publication of tenders over €400,000 globally through the Contractor Profile, for reasons of transparency, while at the same time making ACCIONA Energía's procurement criteria known.
- Maintain audits of tier 2 suppliers for tier 1 equipment supply contracts worth more than €5M, supervising at least 80% of the supply.
- Review of sustainable Procurement criteria and, if possible, system automation to facilitate their control.
- Automation of supplier performance appraisal.
- Maintenance of Compliance Day launched in Mexico

[G1-3] PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

ACCIONA Energía, in the process of running its business, maintains relations with public administrations and participates in renewable energy projects bidding processes in various countries. It, therefore, analyses the corruption risks for each project, based on the country involved and the importance of the operation in question. Thus, policies and control measures are in place to prevent or identify compliance risks, including those related to corruption and, more broadly, those related to criminal compliance.

ACCIONA Energía's criminal compliance and anti-corruption risk management is based on a Crime Prevention and Anti-Corruption Model (CPACM) that is certified under the ISO 37001 and UNE 19601 standards for Anti-bribery and Criminal Compliance Management Systems. The purpose of this CPACM is to foster a culture of ethics and compliance in the organisation, establishing parameters of conduct and mechanisms to detect, prevent and, where appropriate, mitigate potential risks, including criminal risks. The CPACM has been defined in accordance with national and international standards and is complemented by a set of specific policies, processes and controls, considering for this the expectations of the Stakeholders of this Model.

ACCIONA Energía's CPACM is structured around the aforementioned Code of Conduct, the Policy Book and corporate standards applied throughout the organisation, with complementary regulations specific to each business or jurisdiction, which are approved by the Management Team. Specifically, in the area of ethics and integrity, the Organisation has the following Corporate Standards:

- Corporate Standard of the Organisation and Management Model for Crime Prevention and Anti-Corruption (CPACM)
- Corporate Standard for Prevention and Management of Conflict of Interests
- Corporate Standard for Antitrust Compliance
- Corporate Standard for International Economic Sanctions
- Corporate Standard for Relations with Public Officials and Authorities
- Corporate Standard for Donations and Sponsorship
- Corporate Standard for the Offering and Receiving of Gifts and Hospitality in the Private Sector

The CPACM risk management and continuous improvement considers the specific context of each business and specifically includes processes for identifying, assessing, and managing risks related to ethics and integrity in various key processes at ACCIONA Energía, including the process for evaluating business and investment opportunities and for assessing and monitoring third-party risk (including suppliers, partners and business consultants). With regard to this last process, ACCIONA Energía has internal regulations that set out the foundations for carrying out due diligence work on these third parties. In particular:

- Supplier Registration and Approval Guide
- Supply Chain Management Standard

- Corporate Standard for Selecting Partners and Hiring Business Consultants

Based on the processes established in the organisation's regulations, the CPACM provides for the identification, self-assessment, audit and continuous review of the controls implemented to mitigate the materialisation of these compliance risks. In this regard, the CPACM includes specific control measures for criminal compliance, as well as other internal control systems deployed in the organisation, such as the Internal Control over Financial Reporting System (ICFR), the Internal Control System for Social Safeguards (ICSS) and the Tax Compliance Management System (TMCS).

The controls contemplated in the CPACM, as well as the main corporate compliance regulations, are subject to annual certification by those responsible for each control, the Management Team and the national and international compliance team, as key people in the maintenance and promotion of a culture of integrity. The 2024 compliance certification campaign had a 100% completion and acceptance rate.

If a potential materialisation of a compliance risk, including corruption and bribery, is detected, it would be analysed by separate areas of the management chain involved in the matter.

With regard to corruption risks that materialised during the year, none occurred in the jurisdictions in which ACCIONA Energía operates.

Compliance communication and training

ACCIONA Energía has a training and communication programme managed by the Compliance Division, in coordination with the Training and Communication area, the aim of which is to reinforce a culture of ethics and integrity in the Group. This programme, which applies to all members of the organisation regardless of their hierarchical role or geographical location, covers specific objectives in areas such as anti-corruption, competition, criminal risk prevention, sanctions, among others, which is complemented with awareness-raising plans in other areas of compliance coordinated with other areas of the organisation.

The compliance training programme is a fundamental pillar to ensure that all members of the organisation act in accordance with the organisation's values and ethical principles. ACCIONA Energía's business conduct training policy has the following approach:

- Target audience: all members of ACCIONA Energía, regardless of their hierarchical rank and geographical location, must participate in business conduct training programmes.
- Frequency: business conduct training is ongoing. New members of the organisation receive training during their onboarding process and existing employees participate in refresher sessions.
- Mandatory multidisciplinary training: all members of the organisation must take a course on the Code of Conduct. In addition, people in managerial roles (Staff Particularly Exposed to Compliance Risks) and managers must take additional mandatory courses, which provide knowledge of the principles and guidelines for action in anti-corruption, conflict of interest management and the selection of partners and hiring of business consultants.
- Segmented training: the training programme also covers a wide range of topics related to business conduct, including the Code of Conduct, anti-corruption policies, antitrust policies, crime prevention and conflict of interest guidelines, which are defined and modulated based on the level of risk exposure associated with the Group's different businesses. The methodology

and specific contents of the training actions are adapted to the target audience in order to enhance the impact and transmission of knowledge.

Training by country on the Code of Conduct, ANTI-CORRUPTION AND GOOD BUSINESS PRACTICES (no. employees)

COUNTRY	"CODE OF CONDUCT" COURSE	"FIGHTING CORRUPTION" COURSE	"THE RIGHT WAY TO WORK" COURSE
Spain	471	158	225
Australia	102	24	29
Mexico	100	153	83
United States of America	88	12	21
Chile	29	6	17
France	32	2	3
India	13	14	7
Portugal	16	2	7
South Africa	10	4	9
Other	16	11	14
Total	877	386	416

At 31 December 2024, 79% of Staff Particularly Exposed had completed the aforementioned training.

The training programme is accompanied by the implementation of the internal communication programme. Throughout 2024, more than 200 actions were carried out, using the various communication channels that the organisation has set up, such as the Intranet (Interacciona), emailing, the ACCIONA Campus App, Meeting Points (online and face-to-face), videos, etc.

Through emailing, which is considered the most effective communication channel, effectiveness rates of up to 99% have been achieved. The Compliance Meeting Points were attended by 1,065 members of the organisation globally (online and face-to-face).

In addition, segmented communication actions were carried out for specific groups, taking into account their specific needs. These communication actions have been carried out through the channels considered most effective in each case, such as posters, face-to-face and online training sessions, specific emailing, etc.

Among the communication actions in Compliance carried out during the 2024 financial year, the following should be highlighted:

- The continuation of the "Break with Compliance" initiative, which aims to hold face-to-face meetings with staff from different ranks and teams to discuss various Compliance issues. This initiative has been transferred to other jurisdictions, such as Mexico and the Dominican Republic.
- Conducting targeted compliance culture dissemination sessions aimed at members of the Board of Directors, management team, specific businesses, areas especially exposed to risk and areas of special relevance in terms of internal control at both national and international level regarding various compliance issues, such as corruption risks, competition, international sanctions, third-

party due diligence processes, specific regulations on compliance, referring to the specific legislation of the different countries and the Code of Conduct, internal regulations and procedures and the Ethics Channel.

- The launch of a new communication initiative called “Compliance Week”. Specifically, on the occasion of International Anti-Corruption Day, several training sessions were held over the course of a week (9-13 December 2024), with the aim of bringing relevant ethics and integrity issues to all members of the organisation (both nationally and internationally). In particular, a number of compliance issues were discussed during these sessions, including corruption, international sanctions and artificial intelligence. External and internal experts (members of the organisation) on the different subjects took part in these sessions, and at the end of each session there were open spaces for dialogue where staff were free to raise any concerns they might have.

Each year, a Compliance Survey is sent to all members of the organisation worldwide, in order to ascertain their degree of understanding and familiarity with the regulations and practices in this area.

The annual Compliance Survey was launched in December 2024 and is still open. In the 2024 edition, and for the first time, additional mechanisms were established to strengthen the participation of communities without access to digital media. This is the fifth edition of this annual survey and, to date, a total of 2,363 responses have been received globally.

METRICS AND TARGETS

[G1-4] CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY

There were no incidents of corruption and bribery in any of the jurisdictions in which ACCIONA Energía operates during the 2024 financial year. Accordingly, the Organisation has not been exposed to any sanctions, monetary or non-monetary, nor has it been required to take any specific action in this regard.

Actions taken to strengthen an ethical corporate culture

The main initiatives carried out in 2024 in this field were:

- Renewal of the double ISO 37001 and UNE 19601 certification for Anti-bribery Management and Criminal Compliance Systems for ACCIONA Energía in Spain. Both certifications are proof of ACCIONA Energía's commitment to a culture founded on integrity, transparency and regulatory compliance.
- Obtaining of ISO 37001 certification for Anti-bribery Management Systems for ACCIONA Energía Mexico.
- Continuous improvement and reinforcement of the processes, systems and regulations associated with the Internal Reporting System - which includes the Ethics Channel - considering the requirements of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.
- Digitisation of compliance tasks.
- Continuous improvement of third-party analysis and monitoring processes.
- Internationally, the company has continued to deploy its Compliance Model in all the countries where ACCIONA Energía operates, taking into account the standards set forth in the corporate regulations and the regulatory requirements of each territory.
- Continuous improvement of training and awareness-raising activities for the organisation's members both nationally and internationally.
- Reinforcement of ongoing training for members of ACCIONA Energía's Compliance Division, as well as for local compliance officers located in the main jurisdictions where the organisation operates.

The challenges for 2025 are:

- Continue the adaptation of the Internal Reporting System to the requirements of the different jurisdictions where ACCIONA Energía operates.
- Continue to review, update and improve ACCIONA Energía's CPABM nationally and internationally.

- To continue to strengthen and consolidate the international expansion of the ACCIONA Energía CPABM.
- Extending, if possible, the scope of the anti-bribery certification in other countries where ACCIONA Energía operates in accordance with local legislation and the best international practices (ISO 37001).
- Continue to reinforce ongoing and differentiated compliance training based on the specific risks of each activity, territory and hierarchical level within the organisation.
- Continue with the review the body of Group-wide standards in the field of ethics and integrity.
- Continue with the digitalisation of processes associated with the standards.



Compliance Week

On the occasion of International Anti-Corruption Day, several training sessions were held over the course of a week (9-13 December 2024), with the aim of bringing relevant ethics and integrity issues to all members of the organisation (both nationally and internationally). In particular, a number of compliance issues were discussed during these sessions, including corruption, international sanctions and Artificial Intelligence. In addition, external and internal experts (members of the organisation) on the different subjects took part in these sessions, and at the end of all the sessions there were open spaces for dialogue where staff were free to raise any concerns they might have.

[G1-5] POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

ACCIONA Energía maintains a transparent and constant relationship with the public administrations of all the countries where it operates, and has a Corporate Standard for Relations with Public Officials and Authorities applicable to the entire ACCIONA Group and its companies. The company considers public participation in the process of adopting any regulatory initiative to be important in order to ensure that the interests of everyone who will be affected by the measures to be adopted are seen to be duly weighed and reflected.

ACCIONA Energía advocates constant dialogue with regulatory authorities and is committed to full collaboration. As a result, ACCIONA Energía is actively involved in the development of those public policies that affect the areas and sectors in which it operates, contributing the experience of the private sector to the legislating bodies.

The company's position is always consistent with its commitment to environmental protection, support for renewable energies, respect for Human Rights, and sustainable use of resources.

Under the terms of its Code of Conduct, ACCIONA Energía makes no financial contributions for political purposes, or for obtaining any favourable treatment. Likewise, the Organisation does not make sponsorships or donations for these purposes, such conduct being totally contrary to the company's internal regulations.

According to the internal review, there are no members of ACCIONA Energía's administrative, management or supervisory bodies who have held a comparable position in the public or regulatory administration in the two years prior to their appointment.

Contributions to foundations and non-profit organisations

ACCIONA Energía is governed by the Corporate Donations and Sponsorship Regulations supervised by ACCIONA Energía's Compliance Department. The aim of this standard is to establish a framework of action that allows the Group to ensure that donations and sponsorships to charity or non-profit organisations are not used to make illegal payments to civil servants or other people, or for the funds to be used for illegal or inappropriate activities, thus breaching the Organisation's Anti-corruption Action Standards. Any contribution of this type made by ACCIONA Energía should not give rise to any doubt whatsoever as to its appropriateness and, of course, it should not involve the infringement of any applicable law. These rules must be complied with by all the companies and employees of the Group, and also by any third parties acting on their behalf.

In this regard, under the terms of its Code of Conduct, ACCIONA Energía makes no financial contributions for political purposes, or for obtaining any favourable treatment. Likewise, the Organisation does not make sponsorships or donations for these purposes, such conduct being totally contrary to the company's internal regulations. Contributions to such activities amounted to €0 in 2024.

Contributions to foundations and non-profit organisations are made with suitable analysis of the receiving institutions, and also their reputation and financial transparency.

In 2024, ACCIONA contributed €1,247,156 to associations or organisations promoting sustainability and trade associations, among others.

ORGANISATIONS	CONTRIBUTION	INSTITUTIONS RECEIVING THE MAIN CONTRIBUTIONS (IN ORDER)
1. Lobbying, interest representation or similar	€ 283,891	European Australia Business Council, Universidad Politécnica de Madrid, Energy Web Foundation, Innoenergy, Advance Energy United, Marec - Utility Coalition Advocacy and lobbying, AERO
2. Trade associations	€ 963,264.62	American Clean Power Associations (ACPA), Wind Europe, Benban Solar Developers Association, CanREA, Global Wind Energy Council (GWEC), Clean Energy Council Australia, AEE- Asociación Empresarial Eólica (Spanish Wind Energy Association)
TOTAL	€1,247,156	

The largest contributions were made to:

1. 1.- American Clean Power Association (ACPA) - Amount: € 240,251

ACP brings together the resources of energy storage, wind, large-scale solar, clean hydrogen and transmission companies to promote common goals and accelerate the advancement of clean energy as the primary source of energy in the United States.

2. 2.- Wind Europe - Amount: € 83,443

With more than 40 years of experience, WindEurope is the association that represents the interests and supports the growth of the wind industry in Europe.

3. 3.- Benban Solar Developers Association – Amount: € 56,474

Established in 2028, this trade association brings together the solar energy developers involved in the Benban Solar Park in Egypt. Its mission is to facilitate cooperation between its members, promote the efficient development of the park and ensure the smooth integration of solar energy into the Egyptian electricity grid.

4. 4.- Global Wind Energy Council (GWEC) – Amount: € 50,000

The Global Wind Energy Council (GWEC) is the international trade association for the wind energy industry.

Its mission is to ensure that wind energy establishes itself as the answer to today's energy challenges, providing significant environmental and economic benefits.

Within the European Union, ACCIONA Energía’s parent company, ACCIONA, has been registered since 2013 in the EU Transparency Register²², where the interests it pursues, who defends them and the related budget are published in a transparent manner.

²² <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=451019811573-55>



In 2024, ACCIONA Energía has contributed to numerous public hearing procedures and participated in the preparation of reports and position papers of various entities and associations, in support of the decarbonisation of the energy sector related to:

- Promotion of renewable hydrogen and biomethane, including monitoring and participation in the consultation process on the CNMC Circular on access to the gas network by renewable gases.
- Development of offshore wind power in Spain.
- Simplifying the formalities for renewable energy projects, including distributed generation and self-consumption. Proposals to remove regulatory barriers and maximise its potential.
- Hybridisation of renewable technologies and incorporation of storage in existing plants, participation in consultations on relevant operating procedures.
- Development and improvement of operating procedures to enable better integration of renewable energy into the power grid and define the proper way to operate the new resource flexibility and hybrid renewable plants. Proposals and participation in demand management mechanisms (Active Demand Response Service, already operational).
- Life expansion and upgrading of renewable power projects. Clear positioning and promotion of repowering - optional for the producer, opposition to any imposition by the Autonomous Communities - vis-à-vis the Ministry and the Autonomous Communities.
- Process to access and connect renewable plants. Drawing up of regulatory amendments (extension of milestones to maintain permits) and implementing them in specific cases. Follow-up on the regulations on grid access for demand, with specific proposals, important for H2 projects and for batteries/pumping.
- Development of electricity grids to meet the targets set in the energy transition:
 - Specific proposals for modification of the Transport Network Development Plan 2021-2026.
 - Proposals for the Transport Network Development Plan 2025-2030.
 - Participation in the consultation on the network investment limit.
 - Proposals to modify the remuneration methodology for transmission and distribution activities, focused on promoting the incorporation of key elements for the energy transition (minimisation of renewable discharges, preferential connection of pumping stations, acceleration of connection of new demand - hydrogen, data centres, charging points for electric vehicles, etc.).
- Review of the methodology for setting electricity tolls, with a focus on encouraging consumption in periods of high renewable generation, in order to reduce the discharge of primary energy.
- Adequacy of the Supply and Marketing Regulation, with a correct introduction of the independent aggregator.
- Adaptation of Market Rules and operating procedures to the quarter-hour trading period and MIBEL's participation in European balancing platforms.

- Promotion and regulatory development of new flexibility resources (storage, demand management, aggregation, electric car) and new renewable generation technologies (floating solar farms, on channels and wind turbine towers).
- Offers of financial aids for renewable installations, self-consumptions, storage (batteries and hydraulic pumping) and renewable hydrogen.
- Redesign of the electric market and measures that affect the payment of renewable energy (revenue caps on inframarginal technologies). New European market design regulation approved, participation in different consultations on relevant points of the regulation (PPA, CfD, etc.).
- EU regulations to support renewable energy and the value chain: new Renewable Energy Directive (RED III), European Green Deal Industrial Plan.
- EU decarbonisation regulations (ETS, CBAM) and its application to renewable H2.
- Adjustment of the Spanish and EU regulations on power generation with biomass. Participation in consultations to define the new methodology for calculating operating remuneration, which is key to better plant management.
- Follow-up and participation in the process to implement a capacity mechanism in Spain, expected to be called in 2025. Possible participation by means of batteries and hydraulic pumping.

ACCIONA Energía participates in sectoral associations at regional and national level (for example, AEE, APPA), and also at European level (such as WindEurope and CLG Europe; Renewable Hydrogen Coalition, European Clean Hydrogen Alliance and Hydrogen Europe, European renewable hydrogen initiatives) and internationally (GWEC, IRENA). The company participates actively with them and holds positions of responsibility on their management bodies.

[G1-6] Payment practices

The average payment period of ACCIONA Energía is provided below, as required by Final Provision Two of Law 31/2014, of 3 December, which has been prepared by applying the Resolution of the Spanish Accounting and Audit Institute dated 29 January 2016. This information refers to the national scope (Spain²³) to which this regulation applies exclusively:

	2023	2024
Average payment period to suppliers (days)	14.32	15.36

*At the balance sheet closing date in Spain

The average supplier payment period will be understood as period that lapses from the delivery of goods or provision of services by the supplier until the payment of the transaction.

This average supplier payment period is calculated as the quotient formed in the numerator by the sum of the ratio of operations paid by the total amount of payments made plus the ratio of operations pending payment by the total amount of pending payments and, in the denominator, by the total amount of payments made and pending payments.

ACCIONA Energía's contractual supplier payment period is set at 60 days.

In addition, the information required by Law 18/2022, of 28 September, on the Creation and Growth of Businesses is also detailed with regard to invoices paid in a period shorter than the maximum period established in the regulations on late payment (Spain):

	2023	2024
Invoices paid on time out of total invoices paid (%)	92 %	98%

At the close of this report ACCIONA Energía has no pending legal proceedings for late payments.

²³ ACCIONA intends to expand the geographical scope of this information in subsequent Annual Sustainability Reports

[Entity-specific] SUSTAINABLE FINANCING





Since 2016, when ACCIONA issued its first green bond, it has sought to create a positive impact on the planet and people by including ESG elements in its financing. In the last seven years ACCIONA has closed more than 70 transactions with a green or sustainable structure, including bilateral loans, syndicated loans, private bonds, public bonds and lines of credit.

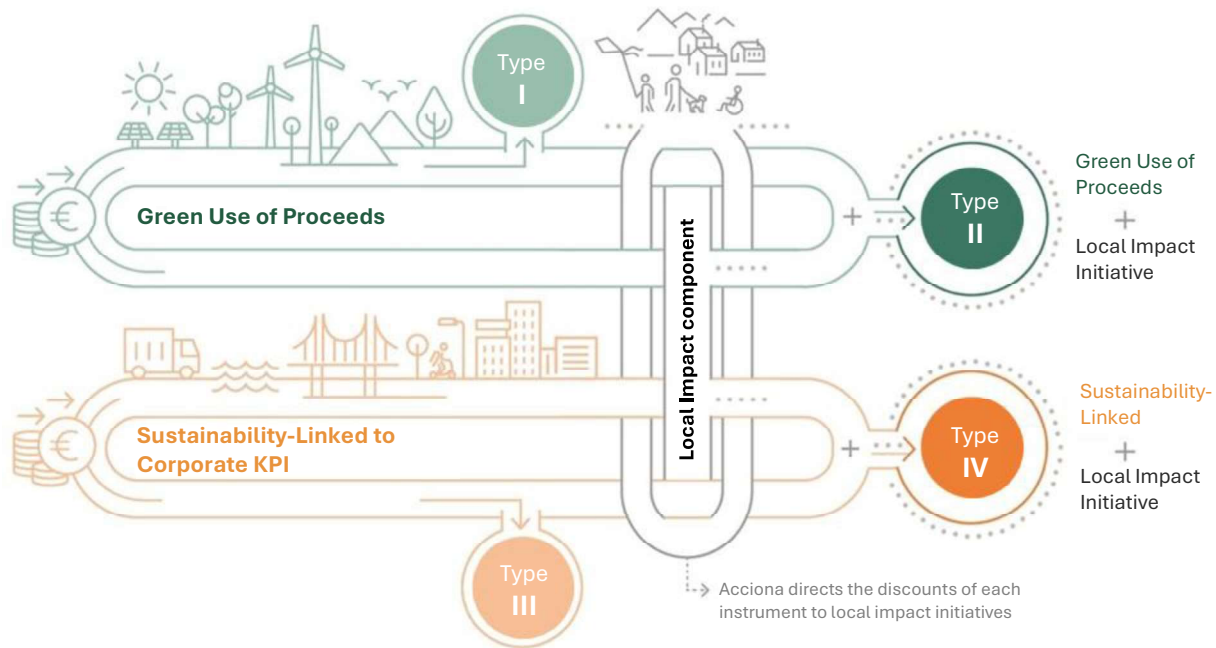
In this regard, 2024 marked a major step forward in ACCIONA and ACCIONA Energía's financing strategy with the publication and consolidation of the Sustainable Impact Financing Framework of the Group. This Framework covers both green finance and sustainability-related financing instruments. In addition, it introduces a new Local Impact accelerator which, combined with either of the two types of instruments mentioned above, results in a "Double Impact" structure. Finally, to increase transparency with the market, the Group includes in the Sustainable Finance Framework a set of clear rules that give greater reassurance to investors and financial institutions.

Sustainable impact financing framework

The Sustainable Impact Financing Framework replaced the previous published financing frameworks and applies to both ACCIONA Energía (Corporación ACCIONA Energías Renovables, S.A.) which is listed and financed independently, and its parent company ACCIONA (ACCIONA, S.A.).

Under this Framework, the Group can issue four types of sustainable financing instruments: the two most well-known types in the market, Green Use of Proceeds ("Green UoP") and Sustainability-linked to Corporate KPIs ("SL"); and the same two instruments with the addition of a Local Impact accelerator:

- 
Type I (Green UoP). In line with the traditional structure of green finance, this type of funding is intended to support economic activities aligned with the EU Taxonomy by promoting specific projects that contribute to environmental objectives.
- 
Type II (Green UoP+Local Impact). This funding structure incorporates a Green UoP structure and therefore channels investments towards activities aligned with the EU Taxonomy, and additionally supports initiatives with positive environmental and/or social impact locally.
- 
Type III (SL). In line with the traditional structure of sustainability-linked financing, these instruments are linked to the achievement of significant and ambitious sustainability objectives defined for the entire corporation.
- 
Type IV (SL+Local Impact). This type of instrument builds on the SL structure and, in addition, supports initiatives that generate a positive environmental and/or social impact at the local level.



The innovation of this new financing scheme, as well as the interest it has generated in the market, have strengthened ACCIONA Energía's position in the area of green and sustainable financing. As a consequence, a large part of the volume of debt issued by the Group is categorised as green or linked to sustainable commitments: at year-end 2023, 95% of ACCIONA Energía's gross corporate debt was green (92%) or sustainable (3%).






GREEN AND SUSTAINABLE FINANCING OPERATIONS 2024 (CORPORATE DEBT)

TYPE OF FUNDING	NEW INSTRUMENTS 2024	TOTAL AMOUNT 2024 (€M)	TOTAL INSTRUMENTS	TOTAL AMOUNT (€M)*
Green Finance (Type I)	1	128	8	2,606.2
Green Finance with Local Impact (Type II)	4	320	6	1,963
Corporate funding with sustainable commitments (Type III)	-	-	-	-
Corporate financing with sustainable commitments, with Local Impact (Type IV)	-	-	2	950
Total *	5	448	18	5,519



* Total amount out of instruments outstanding at year-end 2024. * For operations in currencies other than the Euro, the amount posted is that according to the exchange rate in force at year-end 2024. Rounded amounts.

Ratings ESG




ACCIONA Energía is regularly assessed by multiple ESG rating agencies, ranking among the best in its sector. At 2024 year-end, the ratings from the main ESG agencier were as follows:

Rating Agency	Rating Scale	Score 2024	Ind Average	Industry
	0 to 100	84 Top 5%	37	Elec. Utilities
 Clima	D- to A	A- ¹	C	Utilities
	100 to 0	9,4 Negligible Risk	35 High Risk	Utilities
	D- to A+	A- Prime	D+	Utilities
	0 to 100	82 Platinum	Not applicable	Electricity, gas, steam and air conditioning supply

PRESENCE IN SUSTAINABILITY INDEXES

SUPPLIER	INDEX NAME
	Bloomberg World Energy Alternative Source Index
	Bloomberg Europe 500 Energy Index
	Bloomberg ESG Score Total Coverage Index
	Bloomberg ESG Data Index
	Bloomberg World Energy Large, Mid & Small Cap Price Return Index
	Solactive Renewable Energy NTR Index
	Solactive Longspur Global Clean Energy Index NTR
	Solactive ISS ESG Screened Europe Small Cap Index NTR
	Solactive ISS ESG Screened Paris Aligned Developed Markets Small Cap Index NTR

¹ As of 6 February 2025, the rating was upgraded to “A”, and the company is now part of the list of companies with the highest rating: “A-list”.

	Euronext Low Carbon 300 World PAB NR
	Euronext Low Carbon 100 Eurozone PAB NR
	S&P Global Clean Energy Index
	S&P North America and Europe Clean Energy Index (USD)
	WilderHill Hydrogen Economy Index (USD NTR)
	WilderHill Wind Energy Index (USD NTR)
	WilderHill New Energy Global Innovation Index USD Net TR
Others	BI European Pure-Play Renewable Power Generator Valuation Peers NYLI Candriam Clean Oceans Index-NTR IBEX 35 ENERGY Index Morningstar Global Energy Transition NR CAD

PRESENCE IN RANKINGS AND OTHER SUSTAINABILITY ACKNOWLEDGEMENTS

RECOGNITION	ORGANISATION	POSITION	DESCRIPTION
New Energy Top 100 Green Utilities	Energy Intelligence	2nd utility in the world	ACCIONA Energía has become the second “greenest” electricity generation company in the world.
SE Index Member	Standard Ethics	EE-Sustainable Grade	This index aims to measure over time the stock market confidence in the guidelines and voluntary instructions given by the OECD, EU and UN on Sustainability and Corporate Governance.
2024 Sustainability Rating	EcoVadis	Platinum medal (Top 1%)	ACCIONA Energía has been awarded a Platinum medal with a score of 82/100 in the EcoVadis Sustainability Rating, demonstrating a solid management system that addresses sustainability in an efficient manner.

In line with its commitment to transparency, in 2023 the ACCIONA Group simplified its Sustainable Finance Report which included ACCIONA Energía and developed a tool that facilitates the reporting of asset allocation to green finance, as well as the impact of green finance. This tool allows investors to

identify a specific financial instrument, access its asset allocation, view the non-financial impact attributable to it (installed capacity, energy production, GHG emissions avoided) and also view the performance of corporate and local impact indicators.

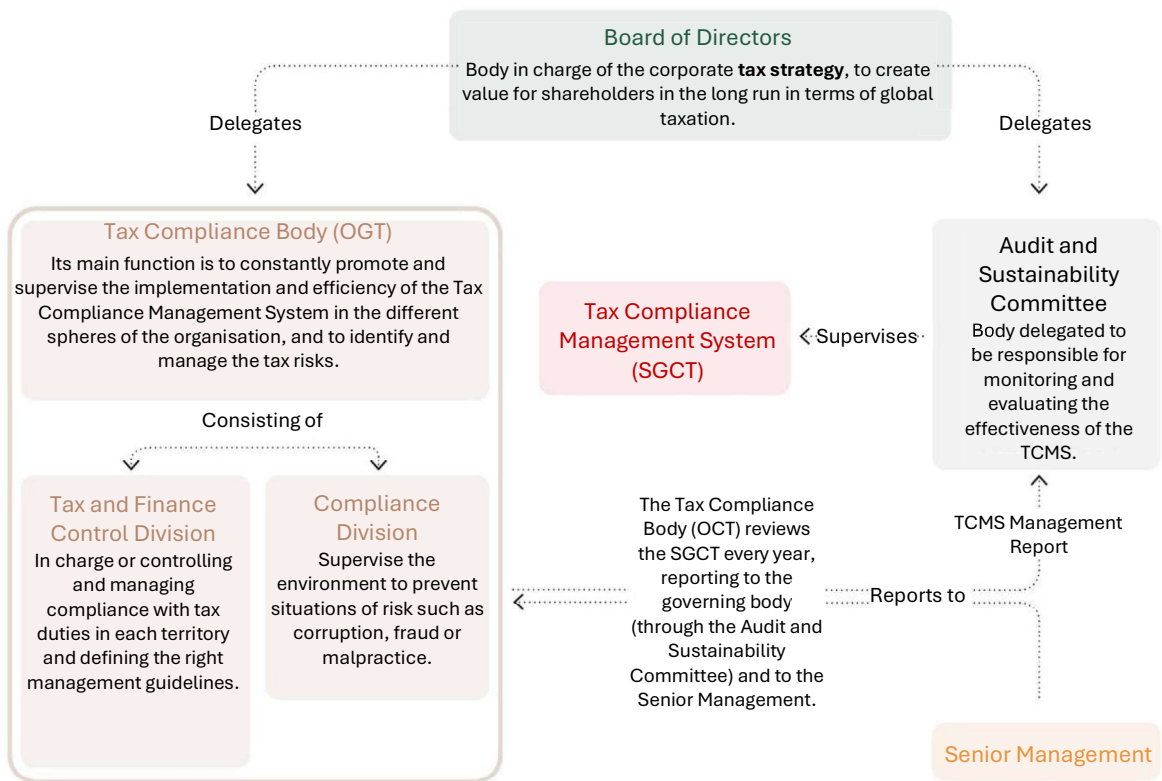
Both the Sustainable Finance Report and information on ACCIONA Energía's financial instruments with associated non-financial impacts can be found on the corporate website at the following link: [Sustainable financing | ACCIONA Energía \(acciona-energia.com\)](https://www.acciona-energia.com)

[Entity-specific] RESPONSIBLE TAXATION

Tax policy

ACCIONA Energía believes that tax systems play a fundamental role in ensuring progress and social wellbeing in any given country, and also serve to maintain macroeconomic stability. The global scope of the company's operations gives it the chance to contribute to the development of public services and fight inequality in the different societies worldwide.

The company's commitment to responsible taxation is laid down in its Tax Policy, which contains the group's strategy and was adapted to the UNE 19602 requirements and certified in 2022. The Tax Policy is based on the principles of compliance with the law and its reasonable interpretation, transparency, prevention and reduction of tax risks, coordination with tax authorities, with the aim of contributing to the countries and territories in which ACCIONA Energía operates.



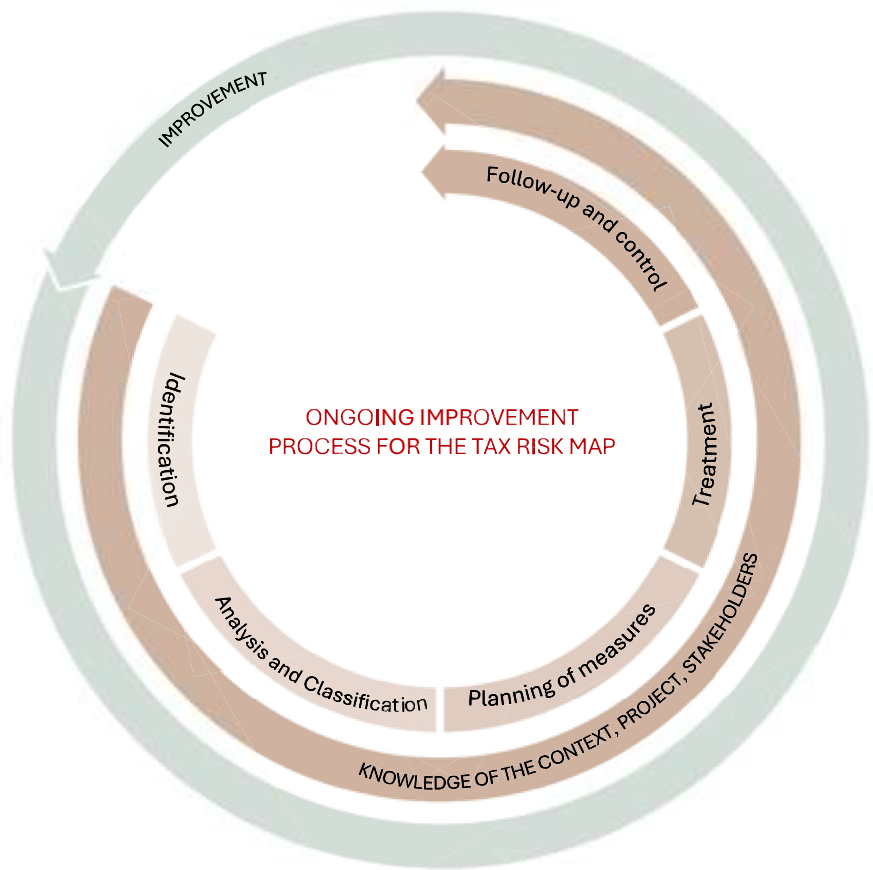
Detection and assessment of risks and opportunities

Conscious of the context of the organisation and the stakeholders identified, the ACCIONA Group has

developed a methodology to identify and assess residual and inherent risks pertaining to tax risk. Tax risks are incorporated into ACCIONA Energía's Risk Map, using the methodology and mitigation plans applied to the rest of the company's risks.

Changes in national tax policies resulting from an increasingly rapid pace of political change in the countries in which ACCIONA Energía operates is a risk that the company addresses through continuous improvement of its Risk Map.

ONGOING IMPROVEMENT PROCESS FOR THE TAX RISK MAP



Transfer pricing

Amounts paid between ACCIONA Energía and its investees and related companies are calculated on the basis of the direct and indirect costs of the support services, applying a market margin.

In accordance with OECD Guidelines, the arm's length principle is applied when assessing and quantifying the market value of the various activities carried out by ACCIONA Energía. This principle is the internationally accepted standard for assessing the appropriateness of related-party transactions, whose conditions and prices must be the same as those that would apply to independent third parties carrying out the same operations or comparable transactions in similar circumstances. Aside from the results, the comparability, reliability and range are taken into account too.

Dispute and litigation management

ACCIONA, the parent company of ACCIONA Energía, submits an Annual Tax Transparency Report to the Spanish Tax Agency (AEAT) every year, following its adherence to the Code of Good Tax Practices in 2011. Also, with regard to tax reporting and transparency duties, the company delivers a Country-by-Country Report to the Spanish Tax Agency every year.

Likewise, the company has been filing its annual voluntary Tax Transparency Report with the ATO (Australian Taxation Office) since 2018. All these reports help prevent new conflicts that may arise from the different fiscal years.

Tax-related conflicts are under the section “Years subject to tax inspection” in the Financial Statements.

The Ethics Channel may be used to report tax-related irregularities confidentially as these violate the Code of Conduct. This Channel is available to both employees and any third party.

Country-by-country information

The following table includes information on all the tax jurisdictions in which the entities included in ACCIONA Energía's Consolidated Financial Statements are resident for tax purposes.

TAX INFORMATION COUNTRY BY COUNTRY (CBC)

Tax jurisdiction	Total sales (€M)	EBT (€M)	Corporate Income Tax accrued (€M)	Corporate Income Tax paid (€M)	Employees at the close of 2024	Grants (M€)	Footnote explaining effective rate due	Footnote explaining effective rate paid
Spain	1888.9	627.7	103.8	155.0	1902	0.0	(4) (10)	(10)
Ukraine	16.8	26.9	4.9	0.0	8	0.0	(6)	(10)
South Africa	61.8	19.4	7.9	7.4	61	0.0	(7)	(2)
Portugal	196.5	8.8	3.6	9.3	36	0.0	(4) (6)	(2)
Mexico	248.7	-17.8	3.4	25.4	279	0.0	(4) (5) (9)	(9) (12)
Chile	236.9	-26.7	-17.0	4.3	160	0.0	(3) (4) (9)	(3) (12)
Australia	65.0	-36.5	-7.2	0.0	281	0.0	(4) (5)	(2)
USA	145.0	-105.9	-6.7	0.0	265	0.0	(7)	(2)
Others	188.6	-13.8	2.3	10.2	232		-	-
Total	3048.3	482.1	94.9	211.5	3224	0.0		

Notes to the table above:

The complete list of ACCIONA Energía companies, and also their main activities, is published annually in appendices I, II and III of the Consolidated Financial Statements.

Furthermore, the social cash flow and tax contribution is published in the Summarised Report. Notes on the “Reconciliation of the accounting profit to the taxable profit”, “Taxes recognised in equity”, “Deferred taxes” and “Reporting Obligations” are published in the Financial Statements.

The Earnings Before Taxes (EBT) is the consolidated figure after allocating corporate analytical costs.

Explanatory notes on the differences between the effective tax rates and the nominal tax rates:

- 1- Reversal of non-deductible expenses (non-taxable income)
- 2- Tax losses in the year
- 3- Application of unrecorded tax credits
- 4- Allocation of consolidation vs. local accounts (Corporate Tax payments) and effect of integrating subsidiaries in functional currency (USD)
- 5- Tax rate for Corporation Tax higher than in Spain
- 6- Tax rate for Corporation Tax lower than in Spain
- 7- Non-capitalisation (recording) of tax credits.
- 8- Capitalisation (recording) of tax credits (BIN).
- 9- Non-deductible expenses and adjustment for inflation.
- 10- Application of tax credits.
- 11- Deferral for accelerated depreciation / unrestricted depreciation.
- 12- Non-application of the tax consolidation method.

As of 31 December 2024, the company had not received any operating subsidies, but had received €26 million in capital subsidies (€11 million in Spain and €15 million in Canada).

None of the jurisdictions ACCIONA Energía operates in is considered a tax haven under Spanish legislation in Royal Decree 1080/1991, amended by the provisions of Royal Decree 116/2003.

Relationship with the auditor

The item “Remuneration and other benefits” of the Consolidated Annual Accounts contains the information on the fees in relation to accounts auditing services and other services provided by the auditor of the company's consolidated annual accounts, KPMG Auditores, S.L., and by companies belonging to the KPMG group, in addition to fees for work invoiced by the annual accounts auditors of the companies included in the consolidation and by the entities linked to them through control, joint ownership or management.

The Audit and Sustainability Committee Report on the independence of the external auditor is prepared annually. In this report, the Audit and Sustainability Committee of the Board of Directors delivers an opinion on the independence of the external auditor for each financial year in relation to ACCIONA Energía and its subsidiaries, and in accordance with applicable legislation on the independence of the Auditor, specifically Spanish Law 22/2015 on Audits, and EU Regulation 537/2014.

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ANNEXES

Annex I. Dual Materiality Analysis Process

Annex II. EU Taxonomy for environmentally sustainable economic activities

Annex III. Table of contents

Annex IV. Policies



ANNEX I. DUAL MATERIALITY ANALYSIS PROCESS

[IRO-1] DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In 2024, ACCIONA Energía completed its third Dual Materiality analysis, consolidating an iterative approach that builds on the lessons learnt and outcomes of previous periods. This analysis meets the requirements of the European Sustainability Reporting Standards (ESRS) and the Corporate Sustainability Reporting Directive (CSRD).

This analysis forms the basis for identifying material impacts, risks and opportunities (IROs) from a dual perspective: impact materiality, which considers the company's significant effects on the environment and society, and financial materiality, which assesses risks and opportunities with the potential to influence the company's financial, operational and strategic situation.

The information obtained through this analysis has been essential for structuring and prioritising the contents of ACCIONA Energía's sustainability report, ensuring its relevance for both stakeholders and internal management. Furthermore, the scope of the analysis included the company's own operations and elements of the upstream and downstream value chain, aligning with international standards such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Phases of analysis:

ANALYSIS OF THE ACCIONA ENERGÍA ECOSYSTEM:

Company strategy, activities, location and contexts

As part of the process, ACCIONA Energía annually reviews its business plan, corporate strategy, financial statements and other relevant information provided to investors, evaluating both active operations and new activities arising from its expansion, diversification or restructuring strategy. This exercise is complemented by a regulatory analysis of the activities and legal framework applicable in the jurisdictions in which the company operates, ensuring regulatory compliance.

Stakeholders

ACCIONA Energía also identifies the company's main stakeholders. This analysis is carried out in accordance with the principles set out in the Stakeholder Engagement Policy, ensuring consistency with the applicable regulatory frameworks.

ACCIONA Energía annually updates its map of interactions with stakeholders, in order to analyse existing the communication channels and issues addressed in conversations. This process helps detect new information requirements and emerging trends.

In 2023, this analysis was expanded through targeted consultations with key external stakeholders, focusing on concerns related to the issues contained in ESRS 1 AR 16 and global sustainability trends.

During 2024, the review process was based on the dialogue systems implemented by the company. This included:

- Evaluation of the company's communication channels.
- Identification of key interaction phases.
- Prioritisation of material topics for each stakeholder group.
- For more information on stakeholder interests and views, please refer to sections SBM-2 of this

document.

Drafting of the preliminary list of impacts, risks and opportunities

Following the analysis of the ACCIONA Energía ecosystem, and based on the list of issues defined in ESRS 1 AR 16 and the relevant corporate documentation, a preliminary list of impacts, risks and opportunities associated with the company's activities, products and services was produced. This process was designed to identify both actual and potential IROs, covering a dual perspective: significant impacts on the environment and society, and financially relevant risks and opportunities for ACCIONA Energía.

This list was produced by following these steps:

Analysis of the risk map: ACCIONA Energía's risk map was used as a starting point, ensuring that identification of IROs was aligned with the assessments carried out by the different areas of the company.

Review of historical documentation and previous material topics: topics identified as material in previous periods were analysed, ensuring the continuity and evolution of the materiality analysis.

Internal consultations with business lines: working sessions were held with representatives from various operational and functional areas to assess how material topics are made evident in the different business sectors. These consultations included strategic, operational, financial and sustainability teams.

Integration of new material issues: during the analysis, emerging issues detected in the regulatory, social and environmental setting were incorporated, including new trends identified in consultations with stakeholders and in benchmarking studies with companies in the sector.

Value chain assessment: in addition to the analysis of own operations, upstream (suppliers) and downstream (customers and end-users) impacts were analysed, ensuring that the preliminary list reflected all relevant interactions within the company's value chain.

Assessment and preparation of the final list of impacts, risks and opportunities

ACCIONA Energía's assessment of impacts, risks and opportunities was carried out separately for each category. However, all analyses were conducted using the same scale, allowing for a faithful and consistent representation of the consolidated results.

Indicator	Qualitative Scoring	Quantitative Scoring	Criteria
Likelihood	[Remote – Very likely]	[1-5]	Percentage of likelihood
Economic-financial consequence	[Non-significant - Major]	[1 -5]	Percentage drop in sales, EBITDA or EBT
Severity/Magnitude of impact	[Low – High]	[1 -3]	Degree of impact (positive or negative) on ecosystems and/or health and safety and/or human rights
Extent of the impact	[Low – High]	[1 -3]	Number of individuals affected (positively or negatively)
Irremediability of the	[Low – High]	[1 -3]	Feasibility, complexity and

impact			degree of acceptability of (negative) impact remediation measures
Impact	[Very low – Very high]	[1 -5]	Severity and Extent and Remediability (if negative impact) of the impact

Assessment of negative impacts

Negative impacts were assessed in line with ACCIONA Energía's environmental and social due diligence systems. This analysis used criteria of likelihood of occurrence and severity (based on scale, extent and remediability) to calculate an inherent value that measures the significance of impacts.

This assessment was carried out at project level, and can be aggregated either at country level or directly at activity level. In this phase, additional mitigation measures and controls were incorporated to adjust the final value of the impacts. The initial results were reviewed by topic managers and validated at corporate level, ensuring that ACCIONA Energía's strategic priorities were aligned with its environmental and social commitments.

Assessment of positive impacts

Positive impacts were assessed in a complementary manner to negative impacts, using specific criteria that reflect their beneficial nature based on their likelihood of occurrence, magnitude and extent. As with negative impacts, these assessments were initially carried out at project level, ensuring a detailed assessment in each operation or directly at activity level. The results were then consolidated to ensure consistency with the company's strategic objectives.

Risk assessment

The risk analysis used a methodology similar to that applied to the impacts, which takes into account the likelihood and the financial consequence (considering the variation in Sales, EBITDA or EBT, according to the criteria established by the tax division).

An initial assessment was carried out at project level and can be aggregated at both country and activity level. It was then adjusted by incorporating specific mitigation controls and systems, reflecting the effectiveness of the measures implemented to reduce its financial consequence or likelihood.

This process was supervised by the business units and validated by the Sustainability area, ensuring that the results were aligned with ACCIONA Energía's strategic priorities and the expectations of its stakeholders.

Opportunity assessment

Opportunities were assessed through a qualitative approach based on estimating the likelihood and financial consequences, carried out through consultations led by the Sustainability area.

Consultation and review of results

Looking ahead to next year, ACCIONA Energía will launch its new 2030 Sustainability Master Plan, which will set out the strategic sustainability guidelines for the next five years. As a basis for its preparation, ACCIONA Energía is carrying out strategic consultations and collaborative work, using the results of the dual materiality analysis as a decision-making tool.

This process includes multiple consultations with external experts and an iterative approach that seeks to identify what the company calls "territories of legitimacy". These territories represent the key areas where ACCIONA Energía can generate greater value and move towards the creation of

regenerative infrastructures. In addition, the process includes the incorporation of stakeholders, with the aim of understanding and anticipating the unspoken expectations of the company's relevant actors.

Reporting and validation by the Board

The final phase of ACCIONA Energía's materiality analysis consists of presenting the consolidated results to the Board of Directors, ensuring their alignment with the company's strategic objectives and compliance with the applicable regulatory frameworks.

Validation of annual materiality findings

The Board of Directors, as the highest supervisory body, reviews and validates the findings of the materiality analysis. This review confirms that the conclusions obtained adequately reflect the company's situation in terms of sustainability, as well as the priorities defined for its business lines and stakeholders. At this stage, the Audit and Sustainability Committee plays a key role in analysing and approving the results before their integration into corporate processes.

Once validated, the material issues identified are incorporated in accordance with ACCIONA Energía's management priorities, ensuring their impact on strategic and operational decisions. The results are also transferred to the planning processes, enabling the company to prioritise initiatives and mitigate risks based on the material areas highlighted.

For more information on Impacts, Risks and Opportunities identified, see the IRO-1 sections of chapters E1, E2, E3, E4, E5 and G1.

[SBM-3] MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE STRATEGY AND BUSINESS MODEL. CONSOLIDATED RESULTS BY TOPIC

ACCIONA Energía's dual materiality analysis (DMA) has identified and analysed the company's impacts on the environment and society, as well as sustainability-related financial risks and opportunities. In total, 123 impacts, risks and opportunities (IROs) have been assessed, of which 83 are considered material, distributed into 27 positive impacts, 32 negative impacts, 20 risks and 4 opportunities. The matrix presented below reflects the results of the most relevant assessments within the DMA.

FINANCIAL MATERIALITY	CRITICAL			E1 Climate change [+O]	
	SIGNIFICANT			S3 Affected communities [-R]	
	MODERATE	S4 Customers and consumers [-R]	E3 Water and marine resources [-R] E2 Pollution [-R]	E4 Biodiversity [-R] G1 Business Conduct [+R] S2 Workers in the Value Chain [-R]	
	MINOR			S1 Own Workforce [+] E5 Circular Economy [-]	
		MINOR	MODERATE	SIGNIFICANT	CRITICAL
		IMPACT MATERIALITY			

Among the most significant material sustainability aspects for the company are climate change (E1), affected communities (S3), Biodiversity and Ecosystems (E4), business conduct (G1) and workers in the value chain (S2). The IROs related to these topics are closely aligned with ACCIONA Energía's business strategy and business model.

The placement of each topic in the matrix has been determined based on the IRO with the highest rating within its category. For example, "E1 Climate Change" is positioned in the corresponding quadrant due to the presence of a positive impact classified as "significant" and an opportunity considered "critical". However, this topic also includes negative impacts and risks assessed as "significant" or "moderate", which are not represented in the matrix.

The following table provides more detail in relation to the dual materiality exercise, breaking down the information by topic and sub-topic.

For more information on the identified Impacts, Risks and Opportunities, please refer to sections SBM-3 of chapters E1, E4, S1, S2, S3 and S4.

TOPICS / BUSINESS	SUB-TOPICS	MATERIALITY	
		Impact	Financial
Climate change	• Adaptation to climate change	✓	✓
	• Mitigation of climate change	✓	✓
	• Energy	✓	✓
Pollution	• Air pollution	✓	✓
	• Water pollution	✓	✓
	• Soil pollution	✓	✓
	• Contamination of living organisms and food resources	✓	✓
	• Substances of concern		
	• Substances of very high concern	✓	
	• Microplastics		
Water and Marine Resources	• Water		
	• Marine resources	✓	✓
Biodiversity and ecosystems	• Factors directly affecting biodiversity loss		
	• Impacts on species status	✓	✓
	• Impacts on the extent and state of ecosystems	✓	✓
	• Impacts on and dependencies on ecosystem services	✓	✓
Circular economy	• Resource inflows, including use of resources	✓	✓
	• Resource outflows related to products and services	✓	✓
	• Waste		
Own workforce	• Working conditions	✓	✓
	• Equal treatment and opportunities for all	✓	
	• Other workers' rights	✓	
Value chain workers	• Working conditions	✓	
	• Equal treatment and opportunities for all	✓	✓
	• Other workers' rights	✓	✓
Affected communities	• Economic, social and cultural rights of groups	✓	✓
	• Civil and political rights of groups	✓	✓
	• Rights of indigenous peoples	✓	✓
End consumers and users	• Incidents related to end consumer or user information	✓	✓
	• Personal safety of end consumers or users	✓	✓
	• Social inclusion of end consumers or users	✓	✓
	Personal Data Protection and the Guarantee of Digital Rights		
Business conduct	• Corporate culture	✓	
	• Whistleblower protection	✓	
	• Animal welfare		
	• Political commitment and lobbying activities	✓	✓
	• Management of relationships with suppliers, including payment practices	✓	✓
	• Corruption and bribery	✓	✓
	Cybersecurity		
	Responsible Taxation	✓	✓
	Competition		

Of the topics covered, the following have not been found to be material after analysis: contamination of living organisms and food resources, substances of very high concern, microplastics, marine resources, animal welfare and social inclusion of end consumers or users.

During the dual materiality analysis process, no impacts, risks or opportunities related to these three topics were identified. In addition, no downstream impacts, risks and opportunities have been detected within workers in the value chain. Responsible taxation has proved to be an entity-specific topic.

Definitions

Topic	Sub-topic	Description
Climate change	Adaptation to climate change	Adaptation to climate change refers to changes in human or natural systems to reduce negative effects or take advantage of opportunities arising from climate alterations. It includes measures such as infrastructure protection or project resilience.
	Mitigation of climate change	Actions to reduce greenhouse gas emissions and limit global temperature rise. This includes the use of renewable energy, improved energy efficiency and the development of clean technologies (<i>IPCC AR6 Report</i>).
	Energy	Managing access, consumption and transition to sustainable energy sources. Energy plays a central role in climate mitigation and presents market opportunities linked to renewable technologies (<i>IEA</i>).
Pollution	Air pollution	Release of pollutants into the air, such as harmful particles or gases, which affect human health and environmental quality. Noise pollution is included (<i>WHO</i>).
	Water pollution	Introduction of harmful substances into water sources such as rivers, lakes and aquifers, affecting biodiversity and human uses.
	Soil pollution	Presence of toxic chemicals or pollutants in the soil that damage its productive capacity or ecological functions (<i>FAO</i>).
	Contamination of living organisms and food	Incorporation of pollutants into organisms or food systems, altering their safety and affecting food chains.
	Substances of concern	Materials or chemicals that exhibit characteristics of toxicity, persistence or bioaccumulation, with risks to human or environmental health (<i>REACH</i>).
	Microplastics	Plastic fragments smaller than 5 mm that remain in the environment and accumulate in living organisms and aquatic ecosystems (<i>UNEP</i>).
Water and marine resources	Water	Management of water consumption, abstraction and discharge in human activities. This includes the reuse and treatment of wastewater to minimise its environmental impact.
	Marine resources	Sustainable use of ocean resources such as seawater, minerals and food, with a focus on protecting biodiversity and reducing impacts on coastal ecosystems.
Biodiversity and ecosystems	Biodiversity impact factors	Factors such as land use change, pollution, invasive species or overexploitation of resources that reduce biodiversity (<i>Convention on Biological Diversity</i>).

	Impacts on species	Changes in species populations due to habitat loss, overexploitation or climate pressure.
	Ecosystem impacts	Degradation of ecosystems by human activities, including desertification, deforestation and soil sealing.
	Ecosystem services	Alterations in the benefits provided by ecosystems, such as water supply, food and climate regulation, which are essential for human well-being.
Circular economy	Resource inflows	Resources required for an organisation's operations, including primary and secondary materials, and their management to optimise their use and minimise waste.
	Resource outflows	Materials and products generated by operations, including by-products and waste to be managed to reduce environmental impacts.
	Waste	Materials discarded after production or consumption processes that cannot be reused or recycled and require proper disposal.
Own workforce	Working conditions	It refers to working conditions, including job stability, clear contracts, adequate working hours, fair wages, occupational safety and health, work-life balance, social dialogue, freedom of association and collective bargaining (ILO Conventions 87 and 98).
	Equal treatment and equal opportunities	It is based on non-discrimination and the promotion of an inclusive environment, guaranteeing equal pay, access to training and professional development, recruitment of people with disabilities and prevention of violence or harassment at work (ILO Convention 111 and UN Guiding Principles on Business and Human Rights).
	Other workers' rights	It guarantees protection against child and forced labour, respect for employee privacy and decent working conditions. It includes training on occupational hazards, secure hosting where necessary and mechanisms to protect workers' personal data.
Value chain workers	Working conditions	This refers to the working conditions of workers in ACCIONA's value chain, both in direct operations and with suppliers and contractors. It includes job stability, reasonable working hours, fair remuneration, occupational health and safety, and an ethical working environment. It also covers labour agreements and compliance with international standards such as ILO Conventions 87 and 98.
	Equal treatment and equal opportunities	It ensures fair and equal treatment for all workers, promoting equal pay, inclusive hiring, access to training and prevention of workplace violence. It ensures that subcontracting respects equality and non-discrimination (ILO Convention 111 and UN Guiding Principles).
	Other workers' rights	It guarantees the prohibition of child and forced labour, decent working conditions and mechanisms for reporting violations. It requires suppliers and contractors to comply with international standards on privacy, health, safety and, where appropriate, to provide secure hosting.
Affected communities	Economic, social and cultural rights	They include access to housing, clean water, food and sanitation, ensuring decent living conditions for communities affected by business activities (<i>Universal Declaration of Human Rights</i>).

	Civil and political rights	They guarantee fundamental freedoms such as the right to political participation, freedom of association and protection from retaliation, especially for human rights defenders.
	Rights of indigenous peoples	Right to self-determination, free, prior and informed consultation, and respect for indigenous culture and traditions, ensuring the preservation of their resources and territories (<i>UN Declaration on the Rights of Indigenous Peoples</i>).
End consumers and users	Information-related incidents	This refers to the information provided to end consumers and users, ensuring its quality, accessibility and transparency for informed decision-making. It includes protection against misleading information and respect for freedom of expression.
	Personal safety of consumers and users	It includes measures to protect the health, safety and well-being of consumers when using products and services. This encompasses safety standards and measures to protect vulnerable groups such as children (<i>ISO 10377 on consumer safety</i>).
	Social inclusion	It promotes equal access to products and services for all consumers, regardless of their origin or status, avoiding exclusionary or discriminatory practices (<i>UN Principles for Responsible Consumption</i>).
	Personal Data Protection and Digital Rights	It encompasses policies and procedures that ensure the integrity, confidentiality and security of personal and business data, complying with regulations such as the <i>General Data Protection Regulation (GDPR)</i> .
Business conduct	Animal welfare	It guarantees the ethical treatment of animals in all the company's operations, prioritising their welfare and compliance with international protection standards (<i>WOAH - World Organisation for Animal Health</i>).
	Political engagement and lobbying	It includes participation in political advocacy activities and relations with governments and public bodies, ensuring transparency and compliance with applicable regulations.
	Management of relationships with suppliers	It includes the ethical and sustainable management of supply chains, with special focus on fair payment practices and compliance with labour and environmental standards.
	Corruption and bribery	A set of practices and controls that prevent illegal activities, such as offering or accepting bribes to obtain undue advantage. It includes compliance with international regulations such as the <i>UN Convention against Corruption</i> .
	Cybersecurity	A set of systems and measures designed to protect the company's digital and operational assets against cyber threats. It includes policies for the protection of critical infrastructure and sensitive data (<i>ISO 27001 on Information Security Management</i>).

ANNEX II. EU TAXONOMY FOR ENVIRONMENTALLY SUSTAINABLE ECONOMIC ACTIVITIES

The active involvement of financial markets in financing the sustainable economy is indispensable for the European Union's plans to move towards a low-carbon economy.

The EU Taxonomy Regulation (EU Regulation 2020/852), which came into force on 12 July 2020, helps to create the world's first "green list", a classification system for sustainable economic activities that will develop a common language for investors and companies when it comes to financing projects or goods and services with a substantial positive impact on the climate and the environment.

Article 8 of the Regulation establishes that any company required to publish non-financial information (under Directive 2013/34/EU), must include information on how and to what extent the company's activities are related to business dealings that are considered environmentally sustainable.

On 6 July 2021, Delegated Regulation (EU) 2021/2178 was published, supplementing EU Regulation 2020/852, which determines that from 1 January 2023 non-financial companies shall disclose "key performance indicators (eligibility and alignment), including any accompanying information in accordance with Annexes I and II of the Regulation" on mitigation and adaptation objectives.

On 27 June 2023, Delegated Regulations (EU) 2023/2485 and 2023/2486 were published, updating and completing the provisions set out in Delegated Regulations (EU) 2021/2139 and 2021/2178 by adding the objectives of Water, Biodiversity, Circular Economy, Pollution and including new eligible activities.

In order to determine the eligibility ratios of the sales, CapEx and OpEx figures of ACCIONA Energía's economic activities, based on the financial statements, the activity carried out in each of the consolidated profit centres has been assessed with the descriptions of activities provided in the annexes to EU Delegated Regulation 2021/2139 and Delegated Regulations (EU) 2023/2485 and 2023/2486.

Once established, the figures selected were divided into the total figures.

The proportion of eligible economic activities according to the taxonomy in 2024 was:

- CapEx: 98.71 % eligible out of total number
- OpEx: 96.60 % eligible out of total number
- Sales: 53.75 % eligible out of total number

The company's activities identified as eligible are:

Mitigation of Climate Change

4.1. Electricity production using solar power technology.

4.2. Electricity production using concentrated solar power technology.

4.3. Electricity production using wind power technology.

4.5. Electricity production using hydroelectric power technology.

4.8. Electricity production from bioenergy.



4.9. Electricity transport and distribution.

4.10. Energy storage.

7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).

7.6. Installation, maintenance and repair of renewable energy technologies.

9.1. Research, development and innovation close to the market.

9.3. Professional services related to the energy efficiency of buildings.

In order to determine the ratios of alignment of the sales, CapEx and OpEx figures of ACCIONA Energía's economic activities, it has assessed compliance for each profit centre with the technical criteria of substantial contribution to the environmental objectives set out in DR (EU) 2020/852 (main text of the European taxonomy), as well as the criteria relating to not causing significant harm established in Delegated Regulations (EU) 2021/2139, 2023/2485 and 2023/2486.

Overall, the activities carried out to develop the requirements of the above-mentioned standards have been as follows:

1. Confirm the eligibility of each activity assessed.
2. Observe that the analysed activity fits the description given in the technical criteria and the defined substantial contribution thresholds.
3. Assess that the operational parameters of the activity are within the limits set in the criteria to avoid significant damage to other environmental goals.
4. As for compliance with the minimum safeguards established in Article 18 of EU Regulation 2020/852, the existence and application of policies, procedures and processes that guarantee them has been assessed, as well as the absence of non-conformities in this regard.
5. Also, confirm the existence of internal procedures or tools to ensure the traceability of information and its consistency with financial reporting.

In 2024, under this criteria, ACCIONA Energía has carried out an analysis of the alignment of sales, CapEx and OpEx figures for the six environmental objectives established in the aforementioned Delegated Regulations. This analysis found that none of the company's activities were aimed at an objective other than climate change mitigation.

The proportion of economic activities aligned with the taxonomy was:

- CapEx: 99.97% aligned on eligible figure being 98.68% aligned on total figure.
- OpEx: 98.34% aligned on eligible figure being 95.00% aligned on total figure.
- Sales: 97.63% aligned on eligible figure being 52.48% aligned on total figure.

Regarding last year's financial results, it is important to highlight the percentage increase in **eligibility** relative to total OpEx and CapEx figures. The trading activity of renewable energy generated by third parties is the main component of the ineligible figures.

As for the **alignment figures**, the CapEx remains above the target of 95% of the eligible figure. CapEx and OpEx increased in percentage terms compared to the previous year despite a decrease in the totals of these figures.

Accounting principles applied

When identifying sales, CapEx and OpEx figures, the indications specified in Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account in relation to the international financial accounting standards.

For sales, the figures extracted relate to the definition given in article 2, section 5, of Directive 2013/34/EU. It includes income recognised under International Accounting Standard (IAS) 1, paragraph 82, letter a), adopted by Commission Regulation (EC) No. 1126/2008 (Regulation (EC) No. 1126/2008 of 3 November 2008, under which certain International Accounting Standards were adopted in accordance with Regulation (EC) no. 1606/2002 of the European Parliament and the Council (DO L 320 of 29.11.2008, p. 1)).

For CapEx, the figures extracted relate to any additions to tangible or intangible assets during the year in question before depreciation, amortisation and any possible new valuations, including those resulting from revaluations and impairment, corresponding to the year in question, excluding any changes in fair value. That figure also includes any additions to tangible or intangible assets resulting from business combinations. The CapEx covers the costs accounted for in accordance with:

- IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- IAS 40 Investment property, paragraph 76, letters a) and b), (for the fair value model);
- IAS 40 Investment property, paragraph 79, letter d), points i) and ii), (for the cost model);
- IAS 41 Agriculture, paragraph 50, letters b) and e);
- IFRS 16 Leases, paragraph 53, letter h).

Any leases that do not result in the recognition of a right to use the asset are not entered as CapEx.

For OpEx, the figures extracted relate to uncapitalised direct costs associated to research and development, building renovation measures, short term leases, maintenance and repairs, as well as any other direct expenses related to the daily maintenance of items of property, plant and equipment by the company or by a subcontracted third party and which are necessary for guaranteeing the ongoing effective functioning of those assets. The expense accounts associated to those figures that were used are those related to:

- ST Leases (<12 months).
- Repairs and conservation.
- R&D expenses for the year.

Different mechanisms have been implemented to ensure the avoidance of duplicate entries. In the first place, observance of the financial accounting standards referred to above makes it possible to guarantee that the figures associated to the same account are not used in two different indicators (this also applies to the accounts indicated for OpEx, for which no financial accounting standards are described).

Secondly, the figures associated to intercompany elimination lines have been reduced to 0 and their amounts have been charged to the original lines that generated those amounts.

Thirdly, no amount that has been allocated to an activity linked to one of the environmental objectives targeted by the EU Regulation 2020/852 (main text of the EU Taxonomy) has been counted twice for activities linked to the other environmental objectives when deriving the consolidated ratios by company. However, this information is provided by objective in the tables below.

The following pages show the results of the eligibility and alignment of ACCIONA's activities with taxonomy. They follow the format of the templates for the key indicators of results for non-financial undertakings under Annex II of the Delegated Regulation (EU) 2021/2178.

For the absolute figures of OpEx and CapEx below the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, for which reason they may differ from the figures presented under the same heading in the company's financial statements.

ALIGNMENT WITH TAXONOMY BY ACTIVITY
ALL ENVIRONMENTAL OBJECTIVES - DELEGATED REGULATIONS (EU) 2021/2139, 2023/2385 AND 2023/2386 – SALES

Turnover				Criteria for substantial contribution							Criteria for the absence of significant harm (“It causes no significant harm”)								
Business activities	Codes	Turnover (€)	Share of turnover, 2024 (%)	Mitigation of climate change (Y; N; N/EL)	Adaptation to climate change (S; N; N/EL)	Water (Y; N; N/EL)	Pollution (S; N; N/EL)	Circular economy (S; N; N/EL)	Biodiversity (Y; N; N/EL)	Adaptation to climate change (Y/N)	Mitigation of climate change (Y/N)	Water (Y/N)	Pollution (Y/N)	Circular economy (Y/N)	Biodiversity (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-aligned turnover (%), 2023	Category (facilitator action) /F/	Category (transition action) /T/
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Sustainable environmental activities (taxonomy-aligned)																			
Electricity production using solar power technology	CCM-4-01/	151,167,035.98	4.96%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	4.03%		
Electricity production using concentrated solar power technology	CCM-4-02/	17,923,842.46	0.59%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.51%		
Electricity production using wind power technology	CCM-4-03/	1,147,847,512.02	37.66%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	43.20%		
Electricity production using hydroelectric power technology	CCM-4-05/	146,438,757.60	4.80%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	4.65%		
Electricity production from bioenergy	CCM-4-08/	52,653,959.72	1.73%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.36%		
Electricity transport and distribution	CCM-4-09/	349,715.66	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.01%	F	
Energy storage	CCM-4-10/	7,879,474.47	0.26%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.25%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	674,234.76	0.02%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.03%	F	
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	7,461,366.74	0.24%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.14%	F	
Research, development and innovation close to the market	CCM-9-01/	-	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.02%	F	
Professional services related to the energy efficiency of buildings	CCM-9-03/	67,261,749.06	2.21%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.71%	F	
Turnover of sustainable environmental activities (taxonomy-aligned) (A.1)		1,599,657,652.48	52.48	52.48	0.00	0.00	0.00	0.00	0.00	Y	Y	Y	Y	Y	Y	Y	55.9		



				48.47	%	%	%	%	%	%	%	%	1%								
Of which facilitators					2.74%	2.74%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	55.91%	F	
Of which transitional					0.00%	0.00%							Y	Y	Y	Y	Y	Y	0.00%		T
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																					
					(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)											
Electricity production using solar power technology	CCM-4-01/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using concentrated solar power technology	CCM-4-02/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using wind power technology	CCM-4-03/	3,528,821.60	0.12%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using hydroelectric power technology	CCM-4-05/	35,321,082.40	1.16%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production from bioenergy	CCM-4-08/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity transport and distribution	CCM-4-09/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Energy storage	CCM-4-10/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Research, development and innovation close to the market	CCM-9-01/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Professional services related to the energy efficiency of buildings	CCM-9-03/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Turnover of taxonomy-eligible activities but not environmentally sustainable (non-taxonomy-compliant activities) (A.2)		38,849,904.00	1.27%	1.27%	0.00%	0.00%	0.00%	0.00%	0.00%												
Total (A.1 + A.2)		1,638,507,552.47	53.75%	53.75%	0.00%	0.00%	0.00%	0.00%	0.00%												
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																					
Turnover of taxonomy non-eligible activities (B)		1,409,753,579.21	46.25%																		
Total (A + B)		3,048,261,131.68	100.00%																		

*Economic activities, when they contribute to more than one objective, are described by the name of the priority objective to which they contribute (marked in bold).

	Sales / Total Sales ratio	
	Taxonomy-aligned by objective	Eligible according to taxonomy by objective
CCM	52.48%	53.75%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.00%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

ACCIONA Energía has estimated the indicators for the consolidated group in accordance with Article 8 of the Taxonomy Regulation. However, in order to reflect the spirit of the EU Taxonomy Regulation considering the vertical integration of our electric activity, when preparing the sales KPI we have deemed it necessary to make a difference –within the energy retail carried out through the Group's utility– between the retail of energy produced by the different production sources and the rest of services for the availability, maintenance and safety of the supply.

Based on the above, the sales KPI in the table reported in ACCIONA Energía's Non-financial Information Statement considers as eligible the retail of energy produced and sold to end customers through the Group's utility, which comes from renewable sources, as it is a vertically integrated activity.

In this regard, ACCIONA Energía has established the control measures required to ensure the right use of the accounting consolidation principles when estimating the indicators, in line with the directions given in the interpretation and implementation guidelines in the Frequently Asked Questions (FAQs) published by the Commission Delegated Regulation (EU) (02/02/22 and 19/12/22) and the ESMA (26/02/21). In particular, for the sales KPI, i) the company has only used sales with external third parties to the company for the calculation (considering the premise of vertical integration mentioned above); ii) has avoided the duplicate entry of revenue in its estimate, iii) and has ensured an analysis based on the company's consolidated revenue data without including internal consumption or other non-eligible services.

Therefore, the total sales reported for renewable energy production equals those shown in Note 28 – Information by segments, of the 2024 consolidated financial statements.

ALL ENVIRONMENTAL OBJECTIVES - DELEGATED REGULATIONS (EU) 2021/2139, 2023/2385 AND 2023/2386 - OPEX

OPEX				Criteria for substantial contribution						Criteria for the absence of significant harm ("It causes no significant harm")									
Business activities	Codes	OPEX (€)	Proportion of OPEX, 2024 (%)	Mitigation of climate change (Y; N; N/EL)	Adaptation to climate change (S; N; N/EL)	Water (Y; N; N/EL)	Pollution (S; N; N/EL)	Circular economy (S; N; N/EL)	Biodiversity (Y; N; N/EL)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water (Y/N)	Pollution (Y/N)	Circular economy (Y/N)	Biodiversity (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-aligned OpeX (%), 2023	Category (facilitator action) (F)	Category (transition action) (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Sustainable environmental activities (taxonomy-aligned)																			
Electricity production using solar power technology	CCM-4-01/	€ 14,684,416.48	11.62%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	3.05%		
Electricity production using concentrated solar power technology	CCM-4-02/	1,051,877.89	0.83%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.66%		
Electricity production using wind power technology	CCM-4-03/	94,844,284.35	75.04%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	80.51%		
Electricity production using hydroelectric power technology	CCM-4-05/	4,080,315.16	3.23%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	2.48%		
Electricity production from bioenergy	CCM-4-08/	2,025,315.92	1.60%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.19%		
Electricity transport and distribution	CCM-4-09/	398,251.51	0.32%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.78%	F	
Energy storage	CCM-4-10/	1,442,585.28	1.14%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.30%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	22,555.14	0.02%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	F	
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	382,783.54	0.30%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.29%	F	
Research, development and innovation close to the market	CCM-9-01/	1,123,690.78	0.89%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.75%	F	
Professional services related to the energy efficiency of buildings	CCM-9-03/	11,671.96	0.01%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.03%	F	
OPEX for sustainable environmental activities (taxonomy-aligned) (A.1)		120,067,748.01	95.00%	95.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	96.97%		
Of which facilitators			2.68%	2.68%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	96.97%	F	



Of which transitional				0.00%	0.00%								Y	Y	Y	Y	Y	Y	Y	0.00%	T
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																					
				(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)												
Electricity production using solar power technology	CCM-4-01/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using concentrated solar power technology	CCM-4-02/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using wind power technology	CCM-4-03/	936,655.99	0.74%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production using hydroelectric power technology	CCM-4-05/	1,084,670.65	0.86%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity production from bioenergy	CCM-4-08/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Electricity transport and distribution	CCM-4-09/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Energy storage	CCM-4-10/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Research, development and innovation close to the market	CCM-9-01/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Professional services related to the energy efficiency of buildings	CCM-9-03/	-	0.00%	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
OPEX for taxonomy-eligible activities but not environmentally sustainable (non-taxonomy-aligned) (A.2)		2,021,326.64	1.60%	1.60%	0.00%	0.00%	0.00%	0.00%	0.00%												
Total (A.1 + A.2)		122,089,074.65	96.60%	96.60%	0.00%	0.00%	0.00%	0.00%	0.00%												
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																					
OPEX for taxonomy non-eligible activities (B)		4,301,172.94	3.40%																		
Total (A + B)		126,390,247.59	100.00 %																		

*Economic activities, when they contribute to more than one objective, are described by the name of the priority objective to which they contribute (marked in bold).

	Proportion of OpEx / Total OpEx	
	that aligns to the taxonomy by objective	Eligible according to taxonomy by objective
CCM	95.00%	96.60%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.00%
PPC	0.00%	0.00%
BIO	0.00%	0.00%



ALL ENVIRONMENTAL OBJECTIVES - DELEGATED REGULATIONS (EU) 2021/2139, 2023/2385 AND 2023/2386 - CAPEX

CAPEX				Criteria for substantial contribution						Criteria for the absence of significant harm ("It causes no significant harm")									
Business activities	Codes	CAPEX (€)	Proportion of CAPEX, 2024 (%)	Mitigation of climate change (Y; N; N/EL)	Adaptation to climate change (S; N; N/EL)	Water (Y; N; N/EL)	Pollution (S; N; N/EL)	Circular economy (S; N; N/EL)	Biodiversity (Y; N; N/EL)	Adaptation to climate change (Y/N)	Mitigation of climate change (Y/N)	Water (Y/N)	Pollution (Y/N)	Circular economy (Y/N)	Biodiversity (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-aligned CAPEX (%), 2023	Category (facilitator action) (F)	Category (transition action) (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Sustainable environmental activities (taxonomy-aligned)																			
Electricity production using solar power technology	CCM-4-01/	827,391,780.23	47.16%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	33.79%		
Electricity production using concentrated solar power technology	CCM-4-02/	-	0.00%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%		
Electricity production using wind power technology	CCM-4-03/	749,999,433.45	42.75%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	61.08%		
Electricity production using hydroelectric power technology	CCM-4-05/	1,893,146.07	0.11%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.11%		
Electricity production from bioenergy	CCM-4-08/	83,701,222.28	4.77%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.24%		
Electricity transport and distribution	CCM-4-09/	334,577.22	0.02%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00%	F	
Energy storage	CCM-4-10/	45,190,804.29	2.58%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.20%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	15,074,735.83	0.86%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.27%	F	
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	3,677,876.76	0.21%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.21%	F	
Research, development and innovation close to the market	CCM-9-01/	1,086,133.73	0.06%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.09%	F	
Professional services related to the energy efficiency of buildings	CCM-9-03/	2,873,629.33	0.16%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.62%	F	
CAPEX for sustainable environmental activities (taxonomy-aligned) (A.1)		1,731,223,339.18	98.68%	98.68%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	97.60%		



Of which facilitators	3.89%			3.89%	0.00%	0.00%	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	97.60%	F	
Of which transitional	0.00%			0.00%						Y	Y	Y	Y	Y	Y	Y	0.00%		T
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																			
				(EL; N/EL)	(EL; N/E L)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)	(EL; N/EL)										
Electricity production using solar power technology	CCM-4-01/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Electricity production using concentrated solar power technology	CCM-4-02/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Electricity production using wind power technology	CCM-4-03/	51,984.11	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Electricity production using hydroelectric power technology	CCM-4-05/	450,941.60	0.03%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Electricity production from bioenergy	CCM-4-08/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Electricity transport and distribution	CCM-4-09/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Energy storage	CCM-4-10/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	CCM-7-04/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of renewable energy technologies	CCM-7-06/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Research, development and innovation close to the market	CCM-9-01/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
Professional services related to the energy efficiency of buildings	CCM-9-03/	-	0.00%	EL	N/E L	N/EL	N/EL	N/EL	N/EL										
CAPEX for taxonomy-eligible activities but not environmentally sustainable (non-taxonomy-aligned) (A.2)		502,925.71	0.03%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%										
Total (A.1 + A.2)		1,731,726,264.89	98.71%	98.71%	0.00%	0.00%	0.00%	0.00%	0.00%										
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
CAPEX for taxonomy non-eligible activities (B)		22,699,983.63	1.29%																
Total (A + B)		1,754,426,248.52	100.00%																

*Economic activities, when they contribute to more than one objective, are described by the name of the priority objective to which they contribute (marked in bold)

	Proportion of CapEx / Total CapEx	
	that aligns to the taxonomy by objective	Eligible according to taxonomy by objective
CCM	98.68%	98.71%
CCA	0.00%	0.00%
WTR	0.00%	0.00%
CE	0.00%	0.00%
PPC	0.00%	0.00%
BIO	0.00%	0.00%

In 2024, ACCIONA Energía, so as to comply with the reporting requirements set forth in the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, with reference to reporting the use of debt issued to fund specific activities identified compliant with the taxonomy and guidelines in the Q&A of 22/02/2022 by the European Commission, issued its Sustainable Finance Report for 2024.

In this report, the company has detailed the list of green bonds and other securities that represent debt for ongoing green operations, as well as information on the return on its green financing, including the details of the assets funded, as well as the positive impacts produced by it on achieving the targets determined by the taxonomy regulation.

ANNEX III. TABLE OF CONTENTS

[IRO-2] DISCLOSURE REQUIREMENTS IN ESRS COVERED BY SUSTAINABILITY STATEMENTS

TABLE OF CONTENTS OF SPANISH LAW 11/2018

Questions addressed by Spanish Law 11/2018 on the disclosure of non-financial and diversity information: material topics for ACCIONA and reporting criteria.

		Chapter	Reporting criteria	Pages
General Topics				
Business model	Brief description of the group's business model	1. ESRS 2 General information	ESRS 2 – SBM-1	39-45
	Markets where it operates	1. ESRS 2 General information	ESRS 2 – SBM-1	49-50
	Organisational objectives and strategies	1. ESRS 2 General information	ESRS 2 – SBM-1	39-45
	Key factors and trends that could affect the future outlook	1. ESRS 2 General information 12. Annexes	ESRS 2 – SBM-1 ESRS 2 – SBM-3	45-47 401-403
General	Reporting framework	1. ESRS 2 General information	ESRS 2 – BP-1	4-5
Management approach	Description of applied policies	1. ESRS 2 General information 2. E1 Climate Change 3. E2. Pollution 4. E3. Water and Marine Resources 5. E4. Biodiversity and Ecosystems 6. E5. Circular Economy 7. S1. Own Workforce 8. S2. Workers in the Value Chain 9. S3. Local Communities 10. S4 Customers and Consumers 11. G1 Business Conduct 12. Annexes	ESRS 2 – GOV-4 ESRS 2 – SBM-2 ESRS E1 – E1-2 ESRS E2 – E2-1 ESRS E3 – E3-1 ESRS E4 – E4-2 ESRS E5 – E5-1 ESRS S1 – S1-1 ESRS S2 – S2-1 ESRS S3 – S3-1 ESRS S4 – S4-1 ESRS G1 – G1-1	21-29 64-67 92-94 120-122 139-141 164-166 183-185 199-207 268-270 287-289 318-322 344-350
	Results of these policies	1. ESRS 2 General information	ESRS 2 – GOV-1 ESRS 2 – SBM-1 ESRS E1 – E1-3; E1-4	8-17 39-56 95-99, 99-100

		Chapter	Reporting criteria	Pages
		2. E1 Climate Change 3. E2. Pollution 4. E3. Water and Marine Resources 5. E4. Biodiversity and Ecosystems 6. E5. Circular Economy 7. S1. Own Workforce 8. S2. Workers in the Value Chain 9. S3. Local Communities 10. S4 Customers and Consumers 11. G1 Business Conduct	ESRS E2 – E2-3; E2-4 ESRS E3 – E3-2; E3-3 ESRS E4 – E4-3; E4-4 ESRS E5 – E5-2; E5-3 ESRS S1 – S1-2; S1-3; S1-4; S1-5 ESRS S2 – S2-2; S2-3; S2-4; S2-5 ESRS S3 – S3-2; S3-3; S3-4; S3-5 ESRS S4 – S4-2; S4-3; S4-4; S4-5 ESRS G1 – G1-1; G1-2; G1-3	128-128-130 141-143, 144 167-170, 171 185-188, 189 207-241 271-280 289-310 322-336 344-350, 351-375, 376-379
	Main risks related to those aspects linked to the group's activities	1. ESRS 2 General information 2. E1 Climate Change 3. E2. Pollution 4. E3. Water and Marine Resources 5. E4. Biodiversity and Ecosystems 6. E5. Circular Economy 7. S1. Own Workforce 8. S2. Workers in the Value Chain 9. S3. Local Communities 10. S4 Customers and Consumers 11. G1 Business Conduct	ESRS 2 – GOV-5; SBM-3 ESRS E1 – SBM-3; E1-9 ESRS E2 – IRO-1; E2-6 ESRS E3 – IRO-1; E3-5 ESRS E4 – SBM-3; E4-6 ESRS E5 – IRO-1; E5-6 ESRS S1 – SBM-3 ESRS S2 – SBM-3 ESRS S3 – SBM-3 ESRS S4 – SBM-3 ESRS G1 – IRO-1	32-34, 67 71-75; 87-91 117-119; 131-132 135-139; 151 154-159, 162-163 179-183; 193-194 197-199 266-268 285-286 313-318 341-344

Environmental matters

Environmental management	Current and foreseeable effects of the business activities on the environment and, where applicable, on health and safety	2. E1 Climate Change 3. E2. Pollution 4. E3. Water and Marine Resources 5. E4. Biodiversity and Ecosystems 6. E5. Circular Economy	ESRS E1 – SBM-3 ESRS E2 – IRO-1 ESRS E3 – IRO-1 ESRS E4 – SBM-3 ESRS E5 – IRO-1	71-75 115-119 135-139 154-159 179-183
	Environmental assessment or certification procedures	1. ESRS 2 General information	ESRS 2 – GOV-5	30-38
	Resources dedicated to the prevention of environmental risks	1. ESRS 2 General information 2. E1 Climate Change	ESRS 2 – GOV-5 ESRS E1 – E1-3 ESRS E2 – E2-2 ESRS E3 – E3-2	30-38 95-99 123-126 141-143

		Chapter	Reporting criteria	Pages
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	Application of the precautionary principle	1. ESRS 2 General information	ESRS 2 – GOV-5	30-38
	Number of provisions and guarantees for environmental risks	Consolidated Financial Statements of ACCIONA, S.A.	ESRS 2 – GOV-5	Note 29 to the Consolidated Financial Statements
Pollution	Measures to prevent, reduce or repair carbon emissions	2. E1 Climate Change	ESRS E1 – E1-3	95-99
Circular economy and waste prevention and management	Measures for prevention, recycling, reuse, other forms of recovery and disposal	6. E5. Circular Economy	ESRS E5 – E5-2	185-188
	Actions to combat food waste	N/A	N/A	N/A
Sustainable use of resources	Water usage and water supply according to local constraints	4. E3. Water and Marine Resources	ESRS E3 – E3-4	144-150
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	Direct and indirect energy consumption	2. E1 Climate Change	ESRS E1 – E1-5	101-104
	Measures taken to improve energy efficiency	2. E1 Climate Change	ESRS E1 – E1-3 ESRS E1 – E1-5	95-99 101-104
	Use of renewable energies	2. E1 Climate Change	ESRS E1 – E1-5	101-102
Climate change	Important elements of greenhouse gas emissions generated as a result of the company's activities	2. E1 Climate Change	ESRS E1 – E1-6	104-110
	Measures taken to adapt to the consequences of climate change	2. E1 Climate Change	ESRS E1 – E1-3 ESRS E1 – E1-9	96 87-91
	Voluntary medium and long-term	2. E1 Climate Change	ESRS E1 – E1-4	100-101

		Chapter	Reporting criteria	Pages
	reduction targets set to reduce greenhouse gas emissions and the measures implemented to that end			
Protecting biodiversity	Steps taken to preserve or restore biodiversity	5. E4. Biodiversity and Ecosystems	ESRS E4 – E4-3	167-170
	Impacts caused by activities or operations in protected areas	5. E4. Biodiversity and Ecosystems	ESRS E4 – SBM-3	154-159
Social and personnel-related questions				
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ANNEX IV. POLICIES

Stakeholder relations policy

Purpose

ACCIONA Energía's **Stakeholder Relations Policy** aims to foster a culture of continuous dialogue and sustained long-term commitment with its stakeholders, ensuring their participation in the organisation's decision-making process.

The organisation's main stakeholders include its direct staff and those involved in the value chain, together with its trade union representatives, customers and users, local communities, partners, suppliers, contractors, subcontractors, public administrations and regulatory bodies, investors and analysts, the media, associations and civil society organisations, as well as the natural environment and the environment itself.

ACCIONA Energía is a signatory to the commitments of the United Nations Global Compact, and its Stakeholder Relations Policy is aligned with the fundamentals of ACCIONA Energía's Code of Conduct and due diligence process reflected in its Environmental and Human Rights policies, and the main international agreements and conventions, actively contributing to the achievement of the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to all employees, suppliers, contractors and collaborators.

Principles

ACCIONA Energía's Stakeholder Relations Policy is based on the following principles:

Identification and prioritisation of stakeholders: ACCIONA Energía identifies and prioritises its stakeholders through regular analyses, ensuring that its commitment to them is aligned with the organisation's strategic objectives. This approach provides an understanding of the profile and needs of stakeholders, facilitating appropriate management of impacts and associated risks, with particular focus on affected local communities and the most vulnerable groups.

Prior, free and informed consultation with indigenous communities: ACCIONA Energía consults

and collaborates in good faith with indigenous communities, seeking their free, prior and informed consent in accordance with the International Labour Organization (ILO) Convention 169 on Indigenous and Tribal Peoples.

Participation in the strategy: ACCIONA Energía considers the relationship with its stakeholders to be a fundamental and effective tool, promoting their participation in the processes of defining and executing the organisation's strategy. To this end, it establishes personalised relationships with each stakeholder group, implementing specific collaboration strategies according to their characteristics and needs.

- **Communication and accountability:** ACCIONA Energía offers its stakeholders accessible communication channels, both in format and language, to facilitate the submission of queries, suggestions and complaints, ensuring that all communications are considered and dealt with appropriately. Similarly, ACCIONA Energía communicates in a timely and accurate manner the results, impacts and action plans derived from its relationship with stakeholders, guaranteeing transparency and keeping all those involved duly informed. ACCIONA Energía is also committed to respecting the privacy and protecting the personal data of its stakeholders.
- **Responsibility and non-discrimination:** ACCIONA Energía promotes an inclusive approach, adapted to the needs of its stakeholders. The organisation acts in a responsible manner, guaranteeing respect for the human rights of all its stakeholders.
- **Continuous improvement:** ACCIONA Energía is committed to constantly reviewing and improving its stakeholder engagement models, adapting to changes and emerging needs to ensure sustainable and effective engagement.
- **Dialogue and skills development:** ACCIONA Energía facilitates relations with its stakeholders, providing the necessary means and resources to create suitable spaces for interaction. In addition, it supports skills development to enable stakeholders to participate actively and under appropriate conditions, if required.
- **Training:** ACCIONA Energía encourages the protection and promotion of stakeholder relations, both within the organisation and in its value chain, offering training in this area to employees, suppliers and contractors, in order to promote a culture of dialogue and relations with stakeholders.
- **Collaboration:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies and social organisations, integrating multiple perspectives in its efforts to promote sustainable solutions.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The **Stakeholder Relations Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Human Rights Policy

Purpose

ACCIONA Energía's **Human Rights Policy** establishes the framework for the protection and promotion of human rights and fundamental freedoms in all of the organisation's activities. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of human rights risks, impacts and opportunities throughout the value chain.

ACCIONA Energía considers it a priority to contribute to the protection of human rights, aligning itself with global efforts to prevent any kind of direct or indirect violation of these rights. The organisation is committed not to cause, contribute to causing or be associated with human rights violations, promoting an environment respectful of human rights in its staff, value chain, local communities and society at large.

ACCIONA Energía's Human Rights Policy is aligned with the principles and objectives of the main international agreements and conventions, such as the International Bill of Human Rights, i.e., the set of documents formed by the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights; the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its 8 core conventions; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; the UN Convention on the Rights of the Child; the UN Global Compact; and the Seoul Declaration on Safety and Health at Work. ACCIONA Energía is aligned with and committed to complying with the UN Guiding Principles on Business and Human Rights and contributing to the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

Principles

ACCIONA Energía's Human Rights Policy is based on the following principles:

- **Equal treatment and opportunities:** ACCIONA Energía promotes a culture of respect and inclusion, prohibiting discrimination on the grounds of age, race, ethnicity, colour, gender, disability, religion, political opinion, national extraction, social origin, sexual orientation, marital status, education, background or any other condition, in line with the Discrimination (Employment and Occupation) Convention, 1958. All employees must receive fair and equitable treatment, with equal opportunities. In addition, the organisation prohibits and prevents all forms of physical, psychological, moral and/or sexual discrimination and harassment, in accordance with the ILO Violence and Harassment Convention, 2019.
- **Freedom of employment, prohibition of forced labour and all forms of modern slavery:** ACCIONA Energía recognises the right to freely chosen work and prohibits forced labour, all forms of modern slavery and human trafficking in accordance with the Forced Labour Convention, 1930 and the Abolition of Forced Labour Convention, 1957. It prohibits any kind of work under threat and ensures that workers do not pay undue fees or costs. It respects the freedom of movement of workers, prohibiting the retention of identity documents, and requires employment agencies to comply with these principles. ACCIONA Energía also undertakes to maintain a work environment free of exploitation and not to

employ any person under 18 years of age, strictly prohibiting child labour in accordance with the Minimum Age Convention, 1973 and the Worst Forms of Child Labour Convention, 1999.

- Freedom of association, unionisation and collective bargaining:** ACCIONA Energía respects and promotes freedom of association, unionisation and the effective recognition of the right to collective bargaining in accordance with the Freedom of Association and Protection of the Right to Organise Convention, 1948; the Right to Organise and Collective Bargaining Convention, 1949; and the Collective Bargaining Convention, 1981. Employees have the right to associate and participate in organisations for the defence of their interests. The organisation does not interfere in workers' elections and guarantees protection against any discriminatory acts that undermine freedom of association. ACCIONA Energía also supports collective bargaining to define working conditions and regulate relations with trade unions.
- Safe and healthy working conditions:** ACCIONA Energía promotes a decent, safe and healthy working environment, based on a health and safety management system in accordance with the highest international standards and industry best practices, in line with the Occupational Safety and Health Convention, 1981 and the Promotional Framework for Occupational Safety and Health Convention, 2006. The organisation promotes a culture of occupational risk prevention as a fundamental pillar to guarantee the health and safety of its employees. Where housing facilities are provided for employees, ACCIONA Energía ensures that housing conditions are adequate and decent, complying with applicable national and international standards.
- Ethical, fair and equitable working and recruiting conditions:** ACCIONA Energía implements recruitment practices that are ethical, fair and equitable, ensuring that employment conditions are based on homogeneous criteria for all groups, with equal opportunities and recognition of professional merit. The organisation fosters the inclusion of people at risk of social exclusion and people with disabilities, promoting their integration into the labour market. ACCIONA Energía provides decent working conditions that meet the basic needs of employees and their families and promotes equal pay for work of equal value. All working conditions are clearly set out in a written contract, in a language understandable to the worker, and comply with ILO Conventions and current legislation.
- Privacy and communication:** ACCIONA Energía respects the confidentiality and the right to privacy of all persons with whom it interacts, and is committed to managing information and data in accordance with national and international data protection laws. In addition, the Organisation ensures that its corporate and commercial communications are non-discriminatory and respectful of different cultures, paying special attention to not adversely affect the most vulnerable groups.
- Respect for the communities in which it operates:** ACCIONA Energía recognises that its commitment to human rights includes individuals and communities that may be affected by its activities, paying special attention to vulnerable groups such as indigenous peoples and minorities. The organisation respects the right of access to food, water, sanitation, energy, education, health, housing, a clean and healthy environment, as well as the rights to freedom of opinion, expression, thought and religion. ACCIONA Energía is committed to avoiding involuntary resettlement and, where this is not possible, to minimising the impact and providing fair compensation. It also respects the land rights of communities and ensures that indigenous peoples can participate in decisions that affect them, in accordance with ILO Convention 169 and free, prior and informed consultation.
- Positive contribution to communities:** ACCIONA Energía contributes to the economic, social and environmental development of the communities in which it operates, raising living standards by generating employment, providing access to basic services and protecting the environment. Through active listening and close cooperation with local communities, ACCIONA Energía contributes to the achievement of these objectives.
- Training:** ACCIONA Energía encourages respect for human rights, both within the Organisation and in

its operating communities and value chain, offering training in this area to employees, suppliers and contractors, in order to promote a culture of respect for and protection of human rights.

- **Partnerships with stakeholders:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies, social organisations and local communities, integrating multiple perspectives in its efforts to protect human rights.

Due diligence

ACCIONA Energía implements the due diligence process in its operations structured in six stages defined in the Guide to Responsible Business Conduct²⁵. This process complies with the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are as follows:

- **Risk and impact identification and assessment:** ACCIONA Energía regularly identifies and assesses actual and potential adverse human rights impacts associated with its business activities and business relationships. This process covers the timelines: short, medium and long term.
- **Detection mechanisms:** ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework of ACCIONA Energía's activities in the area of human rights. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically, in compliance with Principle 31 of the UN Guiding Principles on Business and Human Rights. The Ethics Channel is the instrument that ACCIONA Energía makes available to employees, suppliers, customers and collaborators to report any wrongdoing or violation related to human rights. In addition, the organisation establishes early warning mechanisms to address impacts urgently and minimise their magnitude, in collaboration with affected or potentially affected parties.
- **Mitigation of actual and potential adverse human rights impacts:** ACCIONA Energía establishes internal control systems to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through control activities aligned with the principles of responsible business conduct.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on human rights, ensuring a focus on continuous improvement its practices.
- **Accountability:** ACCIONA Energía publicly discloses assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the human rights implications of its activities. If serious violations are detected, the company undertakes to report them in a transparent manner. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.
- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse human rights impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

²⁵ Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse human rights and environmental impacts; (3) prevent, interrupt or minimise actual and potential adverse human rights and environmental impacts; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remediate.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by changes in legislation, agreements or frameworks in this area.

The **Human Rights Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Environmental policy

Purpose

ACCIONA Energía's **Environmental Policy** establishes the framework for managing the strategy of protecting, preserving and improving the environment. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to ecosystems and their components.

ACCIONA Energía considers it essential to comply with current environmental legislation in all the countries where it operates, minimising its environmental footprint by integrating environmental criteria from the early stages of planning and design of its projects, promoting economic growth that respects the limits of the planet.

In this context, ACCIONA Energía's Environmental Policy is aligned with the main international agreements and conventions on the environment, contributing to the commitments of the Paris Agreement, the Convention on Biological Diversity, the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

ACCIONA Energía's Environmental Policy develops the principles and due diligence framework applied by the company in general environmental matters. Based on the contents of this Environmental Policy, specific thematic policies on Water, Biodiversity, Climate Change and Circular Economy are developed which, building on these general bases, define the specific principles and commitments applicable to these particular aspects.

Scope

This policy applies to all companies in which ACCIONA ENERGÍA holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to all employees, suppliers, contractors and collaborators.

Principles

ACCIONA Energía's Environmental Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international

standards that reinforce more sustainable development models.²⁶

- **Damage prevention:** ACCIONA Energía undertakes to prevent and reverse the adverse effects caused by pollution or overexploitation of natural resources, among others, from its operations, even in locations where there is no regulatory framework in this regard. Harm prevention focuses on:
 - **Land protection:** ACCIONA Energía is committed to responsible land management and use. It promotes the proper management of derived resources and waste that may impact it, with the aim of preventing its pollution and preserving its essential ecological functions.
 - **Water protection:** ACCIONA Energía develops solutions that improve the quality, quantity and availability of water, implementing the necessary measures to prevent any form of pollution and ensure the sustainability of this resource.
 - **Air protection:** ACCIONA Energía promotes the improvement of air quality and the reduction of greenhouse gas emissions, noise and light disturbances, and other types of pollutants released into the air, encouraging the use of clean energy and applying measures to mitigate their impact on the environment.
- **Positive impact:** ACCIONA Energía promotes an approach beyond the mitigation of negative impacts, aware of the progressive deterioration of the planet. This approach integrates the entire life cycle of the project, from design to end-of-life, with the aim of generating a positive impact that we call regenerative.
- **Training:** ACCIONA Energía promotes environmental protection both within the organisation and in its value chain, offering training in this area to employees, suppliers and contractors, in order to extend its commitment to its stakeholders.
- **Partnerships with stakeholders:** ACCIONA Energía actively listens to and collaborates with the private sector, public bodies, social organisations and other stakeholders, integrating multiple perspectives in its efforts to protect the environment and promote sustainable solutions.

Due diligence

ACCIONA Energía implements the due diligence process in its operations structured in six stages defined in the Guide to Responsible Business Conduct²⁷. This process complies with international environmental frameworks, such as the Convention on Biological Diversity, the Paris Agreement, the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are as follows:

- **Risk and impact identification and assessment:** ACCIONA Energía regularly identifies and assesses actual and potential adverse environmental impacts associated with its business activities and business relationships. This process covers the timelines: short, medium and long term.
- **Detection mechanisms:** ACCIONA Energía has specific communication and complaint channels, accessible to all its stakeholders, to identify and respond to any wrongdoing or breaches of applicable legal regulations or the Code of Conduct that occur within the framework of ACCIONA Energía's activities. The Ethics Channel is the instrument that the organisation makes available to employees, suppliers, customers and collaborators to report any wrongdoing. These channels are freely available, confidential, offer protection against retaliation, are culturally appropriate and accessible both physically and linguistically.

²⁶ The Environmental Policy covers all pollutant releases and transfers included in Regulation (EC) No 166/2006 of the European Parliament and of the Council.

²⁷ Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse human rights and environmental impacts; (3) prevent, interrupt or minimise actual and potential adverse human rights and environmental impacts; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remediate.

- **Mitigation of adverse effects:** ACCIONA Energía integrates the results of the assessments of adverse environmental effects in the management and internal control systems, in order to prevent and mitigate the actual and potential risks and impacts identified. These systems are articulated through prevention, mitigation and remediation measures and control activities, aligned with national and international frameworks.
- **Monitoring and continuous improvement:** ACCIONA Energía periodically reviews its internal processes and the measures implemented to prevent and mitigate adverse effects on the environment, ensuring a focus on continuous improvement in its practices.
- **Accountability:** ACCIONA Energía publicly discloses the assessed and materialised risks and impacts, both negative and positive, and the measures taken to address the negative environmental consequences of its activities. It also reports regularly to the Board of Directors, through the Audit and Sustainability Committee.
- **Remediation:** ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse environmental impacts. The organisation is committed to providing effective means of remediation throughout its value chain.
- **Collaboration with the authorities:** ACCIONA Energía collaborates actively and fully with the competent authorities, ensuring its participation in the processes necessary to remedy any adverse effects that may have occurred.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks. The **Environmental Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Biodiversity policy

Purpose

ACCIONA Energía's Biodiversity Policy establishes the framework for the conservation and protection of ecosystems and individuals present in habitats, both marine and terrestrial, within the organisation's value chain. This Policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to the protection and restoration of biodiversity and ecosystems.

ACCIONA Energía actively contributes to the preservation of marine and terrestrial ecosystems. The organisation promotes the sustainable management and responsible use of natural capital in line with the targets of Net Biodiversity Loss by 2030 and Net Positive Biodiversity Gain by 2050.

ACCIONA Energía's Biodiversity Policy is aligned with the main international agreements and conventions on the protection and conservation of biodiversity and ecosystems, contributing to the goals and targets of the Kunming-Montreal Global Biodiversity Framework, the UN Global Compact and the achievement of the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and

professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

Principles

ACCIONA Energía's Biodiversity Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Application of the mitigation hierarchy:** ACCIONA Energía is committed to carrying out the necessary actions in its operations and projects to ensure compliance with legislation and reverse the loss of biodiversity. ACCIONA Energía applies the mechanisms for mitigating adverse effects on biodiversity in accordance with the following stages:
 - **Prevent:** Avoid adverse effects caused by pollution, overexploitation of natural resources or poor environmental protection in the course of its operations, even in locations where there is no regulatory framework.
 - **Minimise:** Minimise unavoidable impacts that negatively affect species and ecosystems through the implementation of the necessary corrective measures, the acquisition of local resources, and the use of certified sustainable resources, among others.
 - **Restore:** Recover, as far as possible, the areas affected by the development of projects or services and rehabilitate those that are degraded, providing additionality with respect to their initial state and preserving ecosystem services.
 - **Offset:** Implement offsetting actions where residual impacts cannot be fully mitigated, contributing to the commitment to halt Net Biodiversity Loss by 2030.
- **Conservation and protection of terrestrial and marine ecosystems:** ACCIONA Energía identifies critical ecosystems of high conservation value and key areas for biodiversity, which allows it to take actions aimed at improving the state of its operating environments, adjacent areas and other zones, ensuring respect for and integration of indigenous territories and local communities.
- **Preventing deforestation:** ACCIONA Energía is firmly committed to Zero Net Deforestation by 2030, ensuring that its activities do not contribute to the loss of natural forests, promoting forest restoration and full offsetting of affected areas. This commitment extends to its value chain through sustainable procurement.
- **Positive impact and net biodiversity gain:** ACCIONA Energía, aware of the progressive deterioration of the planet, is promoting an approach that goes beyond mitigating negative impacts. This approach integrates the entire life cycle of the project, from design to decommissioning, with the aim of generating a positive impact that we call regenerative. In this respect, the organisation promotes the recovery of lost biodiversity, both terrestrial and marine, through specifically targeted actions, to generate a net gain in biodiversity.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The Biodiversity Policy forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Water Policy

Purpose

ACCIONA Energía's **Water Policy** establishes the framework for managing water and marine resources. This policy defines the principles of responsible business conduct that guide due diligence related to water consumption, abstractions and discharges.

ACCIONA Energía recognises water as a limited, irreplaceable and essential natural resource that requires tools to guarantee its quantity, availability and quality in the long term, especially in the most vulnerable local communities with high water stress.

The organisation's Water Policy is developed according to the main international agreements and conventions that promote the protection and conservation of water, contributing to the commitments of the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

Principles

The Water Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Damage prevention:** ACCIONA Energía undertakes to prevent and avoid adverse effects on the water environment caused by pollution, the use of chemicals, substances of concern or very high concern, or the overexploitation of the resource from its operations, even in locations where there is no regulatory framework in this regard.
- **Preservation and conservation:** ACCIONA Energía is committed to the preservation of water resources, promoting the use of reclaimed water and ensuring that it is returned to the environment under compatible

conditions and without altering the water environment in which its facilities are located. In addition, it actively contributes to the conservation of water resources, due to the high efficiency in water consumption of renewable energies in general, and of wind and photovoltaic technology in particular, compared to non-renewable technologies.

- **Positive Impact:** ACCIONA Energía promotes an approach that goes beyond mitigating negative impacts, aware of the need to increase the quantity and quality of water resources, especially in areas of high water stress. This approach is applied throughout the life cycle of projects, with the aim of generating a positive impact that we call regenerative.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The **Water Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Climate change policy

Purpose

ACCIONA Energía's **Climate Change Policy** establishes the framework for managing the transition strategy towards more efficient practices, driving the organisation's climate action. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to both climate change mitigation and adaptation.

ACCIONA Energía considers it a priority to lead the energy transition and invest in business models for decarbonisation, aligning itself with global efforts to limit the increase in the planet's average temperature to 1.5°C by 2050. Through its projects, products and services, the organisation actively contributes to the mitigation of climate change, promoting an effective reduction of greenhouse gas emissions through the production of energy exclusively from renewable sources and the development of technologies and services for the decarbonisation of its customers, also establishing strategies for adapting to climate change.

ACCIONA Energía's Climate Change Policy is aligned with the main international agreements and conventions on mitigation and adaptation, contributing to the commitments of the Paris Agreement, the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

Principles

ACCIONA Energía's Climate Change Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models, even in locations where there is no regulatory framework in this regard.
- **Damage prevention:** ACCIONA Energía is committed to avoiding, preventing and mitigating the adverse effects caused by its activities, through the development and use of renewable energies and clean technologies.
- **Climate leadership:** ACCIONA Energía leads the fight against climate change, developing solutions for the decarbonisation of the economy. The organisation focuses its investments on activities recognised by the EU taxonomy for sustainable activities.
- **Science-based targets:** ACCIONA Energía sets science-based emission reduction targets that contribute to the objective defined in the Paris Agreement.
- **Net Zero:** ACCIONA Energía is committed to decarbonising its business model, promoting the use of 100% renewable energy sources and optimising energy consumption to meet its Net Zero commitment.
- **Renewable energy:** ACCIONA Energía promotes the development and use of renewable energies, thereby reducing global dependence on fossil fuels and encouraging the electrification of the economy. In this way, it actively contributes to climate change mitigation.
- **Resilient infrastructure:** ACCIONA Energía promotes the development, operation and maintenance of infrastructures adapted to climate change and its effects, enabling an uninterrupted service to its customers and society.
- **Positive impact:** ACCIONA Energía promotes an approach beyond the mitigation of negative impacts, aware of the progressive deterioration of the planet. This approach integrates the entire life cycle of the project, from design to end-of-life, with the aim of generating a positive impact that we call regenerative.
- **Driving mechanisms:** ACCIONA Energía implements a series of internal mechanisms that facilitate the transition to a decarbonised model. These include:
 - **Carbon budget:** ACCIONA Energía allocates carbon budgets to its facilities with significant emissions, establishing an internal price that varies according to the degree of achievement of the company's climate targets.
 - **Decarbonisation fund:** ACCIONA Energía allocates an annual internal fund to finance specific decarbonisation measures in its projects, thus promoting specific initiatives to reduce emissions.
 - **Compensation for climate targets:** ACCIONA Energía has integrated a decarbonisation strategy across the entire organisation, reflected in the annual variable remuneration, thus incentivising compliance with climate targets.
 - **Neutralisation:** ACCIONA Energía, on its path towards Net Zero, promotes the development of projects that capture and permanently store carbon from the atmosphere with the ultimate goal of neutralising the remaining emissions in order to achieve its GHG emissions reduction target and its Net Zero commitment.
 - **Mitigation beyond the value chain:** ACCIONA Energía invests in mechanisms that contribute to the financing and development of projects that reduce greenhouse gas emissions beyond its value chain.

Policy review and approval



This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks.

The **Climate Change Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.

Circular economy policy

Purpose

ACCIONA Energía's **Circular Economy Policy** establishes the framework for implementing a circular resource and waste management model in a comprehensive manner. This policy defines the principles of responsible business conduct that guide the identification, assessment and management of dependencies, impacts, risks and opportunities related to resource use and the circular economy.

ACCIONA Energía promotes the transition towards circular economy models that decouple economic growth from the use of virgin resources and the generation of waste. The organisation contributes to the design and implementation of processes and technologies that continue and maximise the value of resources, eliminate waste and pollution, and promote the regeneration of natural systems.

In this context, ACCIONA Energía's Circular Economy Policy is aligned with the main international agreements and conventions that promote the principles of the circular economy, contributing to the commitments of the Kunming-Montreal Global Biodiversity Framework, the United Nations Global Compact and the achievement of the Sustainable Development Goals (SDGs).

Scope

This policy applies to all companies in which ACCIONA Energía holds a majority stake, exercises control or has management responsibility, regardless of their geographical location, as well as to the organisation's managers and professionals, regardless of their position.

In companies in which ACCIONA Energía has a stake, and where it does not have management responsibility, it will be the organisation's representatives on the administrative and management bodies who will promote the adoption of this policy.

ACCIONA Energía extends, insofar as it has influence, the adoption of the principles contained in this policy to its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The policy is publicly available to all stakeholders and is actively communicated to employees, suppliers, contractors and collaborators.

Principles

The Circular Economy Policy is based on the following principles:

- **Regulatory compliance:** ACCIONA Energía rigorously complies with current environmental regulations, as well as promoting and supporting the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Damage prevention:** ACCIONA Energía undertakes to prevent and reverse the adverse effects caused by the overexploitation of natural resources, the deficient management of waste from its operations, and the associated pollution, even in locations where there is no regulatory framework in this regard.
- **Sustainable supply and use of renewable resources:** ACCIONA Energía promotes sustainable sourcing

and the use of renewable materials in all its activities, optimising consumption and encouraging responsible practices throughout its value chain.

- **Circular design:** ACCIONA Energía adopts an approach that goes beyond mitigating negative impacts, aware of the need to reduce dependence on virgin raw materials and increase the circularity of resources. This approach integrates the use of advanced tools such as Life Cycle Assessment (LCA), eco-design and digitalisation, allowing the optimisation of resources throughout the life cycle of projects, with the aim of generating a positive impact that we call regenerative.
- **Maintain and reuse:** ACCIONA Energía promotes the responsible use of resources with the aim of extending their useful life through predictive maintenance processes and reuse in similar activities. Where feasible, repair and refurbishment of damaged products is considered as a preliminary step to the replacement of any installation or equipment.
- **Share and co-create:** ACCIONA Energía promotes increased product usage time through shared-use platforms and industrial organisation models in which the product or by-product of one organisation becomes the resource of another, following the concept of "Industrial Symbiosis".
- **Redistribute:** ACCIONA Energía implements actions to redistribute materials and products both within the scope of its activities and those of third parties, maximising the use of secondary resources and promoting sustainable supply in its value chain.
- **Regenerate:** ACCIONA Energía implements renaturalisation actions in the local environments and ecosystems where it operates, promoting the regeneration of natural capital.

Policy review and approval

This policy will be reviewed at least every five years to ensure alignment with the organisation's strategic objectives and, in any case, when required by legislative changes or changes in international agreements or frameworks. The **Circular Economy Policy** forms part of ACCIONA Energía's "Policy Book", which is available on the corporate website and on the organisation's Intranet. It is accessible in the main languages of the countries in which ACCIONA Energía operates, to make it easier for stakeholders to consult.



Corporación Acciona Energías Renovables, S.A. and subsidiaries

Limited Assurance Report Issued by an
Assurance Provider on the Consolidated Non-
Financial Information Statement (NFIS) and
Sustainability Report

31 December 2024

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



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

Limited Assurance Report Issued by an Assurance Provider on the Consolidated Non-Financial Information Statement and Sustainability Report of Corporación Acciona Energías Renovables, S.A. and subsidiaries for 2024

(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.

Limited Assurance Conclusion

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the Consolidated Non-Financial Information Statement (hereinafter NFIS) of Corporación Acciona Energías Renovables, S.A. (hereinafter the Entity) and its subsidiaries (hereinafter the Group) for the year ended 31 December 2024, which forms part of the consolidated directors' report of the Group.

The content of the NFIS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, specifically including the sustainability reporting prepared by the Group for the year ended 31 December 2024 (hereinafter the sustainability reporting) in accordance with Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 as regards corporate sustainability reporting (CSRD). This sustainability reporting has also been subject to limited assurance review.

Based on the procedures conducted and the evidence we have obtained, no issues have come to our attention that would lead us to believe that:

- a) The Group's Non-Financial Information Statement for the year ended 31 December 2024 has not been prepared, in all material respects, in accordance with the contents included in prevailing mercantile legislation and with the selected European Sustainability Reporting Standards (ESRS) or other criteria described in accordance with each subject matter in the "Appendix III. Index of contents" table of the aforementioned statement;
- b) The sustainability reporting as a whole has not been prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and identified in the accompanying note "[BP-1] General basis for preparation of the sustainability statement", including:
 - That the description provided of the process to identify the sustainability reporting included in note "Appendix I. Double materiality analysis process" is consistent with the process in place and that it identifies the material information to be disclosed in accordance with the requirements of the ESRS.
 - Compliance with the ESRS.

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

- Compliance of the disclosure requirements, included in "Appendix II. European taxonomy of environmentally sustainable economic activities" of the sustainability reporting, with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

Basis for Conclusion

We have performed our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically with the guidelines contained in the Revised Guidelines 47 and 56 issued by the Spanish Institute of Registered Auditors on assurance engagements on non-financial information and considering the content of the note published by the ICAC on 18 December 2024 (hereinafter generally accepted professional standards).

The procedures applied in a limited assurance engagement are less extensive compared to those required in a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the level of assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those standards are described in more detail in the *Responsibilities of the assurance provider* section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) of the International Ethics Standards Board for Accountants (IESBA Code of Ethics), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires a quality management system to be designed, implemented and operated that includes policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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

Emphasis of Matter

We draw attention to the accompanying note "[BP-1]: General basis for preparation of the sustainability statement" of the NFIS, which states that the Non-Financial Information Statement and Sustainability Reporting is presented as a separate document from the consolidated directors' report, of which it forms part, as this is one of the options considered in Law 11/2018 on non-financial information. Our conclusion is not modified in respect of this matter.

Directors' Responsibilities

The preparation of the NFIS included in the consolidated directors' report of the Group, and the content thereof, is the responsibility of the Directors of Corporación Acciona Energías Renovables, S.A. The NFIS has been prepared in accordance with prevailing mercantile legislation and the

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

selected ESRS and other criteria described in accordance with each subject matter in the “Appendix III. Index of contents” table of the aforementioned statement.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFIS is free from material misstatement, whether due to fraud or error.

The Directors of Corporación Acciona Energías Renovables, S.A. are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFIS was obtained.

In relation to sustainability reporting, the entity's Directors are responsible for developing and implementing a process to identify the information to be included in sustainability reporting in accordance with the CSRD, the ESRS and article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 and for disclosing information about this process in the sustainability disclosures themselves in note “Appendix I. Double materiality analysis process”. This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, and its stakeholders, in relation to the Group's impact on people and the environment;
- identifying actual and potential impacts (both negative and positive), and any risks and opportunities that might affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to financing and the cost of capital in the short, medium or long term;
- evaluating the materiality of the impacts, risks and opportunities identified;
- making assumptions and estimates that are reasonable in the circumstances.

The Directors are also responsible for the preparation of sustainability reporting, including the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with the ESRS and compliance with the disclosure requirements included in “Appendix II. European taxonomy of environmentally sustainable economic activities” of the sustainability reporting with article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Directors determine is relevant to enable the preparation of sustainability reporting that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for sustainability reporting and making assumptions and estimates that are reasonable in the circumstances for specific disclosures.

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

Inherent Limitations in the Preparation of the Information

In accordance with the ESRS, the entity's Directors are required to prepare prospective information based on assumptions, which are to be included in the sustainability reporting, about events that may occur in the future, as well as possible future actions, if any, that the Group may take. The actual outcome may differ significantly from the estimate, as it refers to the future and future events often do not occur as expected.

In determining sustainability disclosures, the entity's Directors interpret legal and other terms that are not clearly defined and may be interpreted differently by other people, including the legal conformity of such interpretations, and are therefore subject to uncertainty.

Responsibilities of the Assurance Provider

Our objectives are to plan and perform the assurance engagement in order to obtain limited assurance about whether the NFIS and sustainability reporting are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report containing our conclusions thereon. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we apply our professional judgement and maintain an attitude of professional scepticism throughout the engagement. We also:

- Design and implement procedures to assess whether the process for identifying the information to be included in both the NFIS and sustainability reporting is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of material information to be disclosed in accordance with the requirements of the ESRS.
- Apply risk-based procedures, including obtaining an understanding of internal controls relevant to the engagement in order to identify the disclosures in which it is most likely that material misstatements arise, whether due to fraud or error, but not for the purpose of providing a conclusion about the effectiveness of the Group's internal control.
- Design and implement procedures that respond to disclosures in both the NFIS and sustainability reporting in which material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Carried Out

A limited assurance engagement includes performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of the procedures selected depend on professional judgement, including an identification of the disclosures in which material misstatements, whether due to fraud or error, are likely to arise in the NFIS and sustainability reporting.

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

Our work has consisted of making inquiries of management, as well as of the different units and components of the Group that have participated in the preparation of the NFIS and sustainability reporting, reviewing the processes for compiling and validating the information presented in the NFIS and sustainability reporting and applying certain analytical procedures and sample review tests, which are described below:

In relation to the NFIS assurance review process:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for 2024 based on the materiality analysis performed by the Group and described in "Appendix I. Double materiality analysis process", considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFIS for 2024.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the NFIS for 2024.
- Corroboration, through sample testing, of the information relative to the content of the NFIS for 2024 and whether it has been adequately compiled based on data provided by the information sources.

In relation to the assurance on sustainability reporting process:

- Making inquiries of Group personnel:
 - to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
 - to understand the source of information used by management (e.g. stakeholder interaction, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Gaining, through inquiries with Group personnel, an understanding of the entity's processes for collecting, validating and presenting information relevant to the preparation of its sustainability reporting.
- Assessing the consistency of the evidence obtained from our procedures on the Group-implemented process to determine the information to be included in sustainability reporting with the description of the process included in such disclosures, and assessing whether the Group-implemented process identifies the material information to be disclosed in accordance with the requirements of the ESRS.
- Assessing whether all the information identified in the Group-implemented process to determine the information to be included in sustainability reporting is effectively included.
- Assessing the consistency of the structure and presentation of sustainability reporting with the provisions of the ESRS and the rest of the sustainability reporting framework applied by the Group.

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- Conducting inquiries of relevant personnel and analytical procedures on information disclosed in the sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive sampling procedures on the information disclosed in the selected sustainability reporting, considering information in which material misstatements are likely to arise, whether due to fraud or error.
- Procuring, where applicable, the reports issued by accredited independent third parties accompanying the consolidated directors' report in compliance with EU regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, confirming, exclusively, the accreditation of the assurance provider and that the scope of the report issued complies with EU regulations.
- Procuring, where appropriate, the documents containing the information included by reference, the reports issued by auditors or assurance providers of such documents and, in accordance with generally accepted professional standards, confirming, exclusively, that, as regards the document to which the information included by reference, the conditions described in the ESRS for including information by reference in the sustainability reporting are met.
- Procuring a representation letter from the Directors and management regarding the NFIS and sustainability reporting.

Other Information

Entity management is responsible for the other information. The other information comprises the consolidated annual accounts and other information included in the consolidated directors' report, but does not include either the auditor's report on the consolidated annual accounts or the assurance reports issued by accredited independent third parties required by EU law on specific disclosures contained in the sustainability reporting and accompanying the consolidated directors' report.

Our assurance report does not cover the other information and we do not express any assurance conclusions about it.

In connection with our assurance engagement on the sustainability reporting, our responsibility is to read the other information identified above and, in doing so, consider whether there is a material inconsistency between the other information and the sustainability reporting or the knowledge we have obtained during the assurance engagement that could be indicative of material misstatements in the sustainability reporting.

KPMG Auditores, S.L.

(Signed on original in Spanish)

This report
corresponds to
stamp number
01/25/00552
issued by the
Spanish Institute of
Registered
Auditors (ICJCE)



Certificación

(Ley Orgánica de 26 de abril de 1900)
(Ley 1/2000, de 7 de enero, art. 144)
(Reales Decretos 2555/1977, de 27 de agosto,
889/1987, de 26 de junio, 752/1992, de 27 de junio y
79/1996, de 26 de enero)
(Orden Ministerial de 8 de febrero de 1996)
(Orden AEC/2125/2014, de 6 de noviembre)

Don Ignacio Hernando Miguel del Corral, Intérprete Jurado de inglés nombrado por el Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, certifica que la que antecede es traducción fiel y completa al castellano de un documento redactado en lengua inglesa. En la villa de Madrid, a veintitrés de abril de dos mil veinticinco.



**HERNANDO
MIGUEL DEL
CORRAL IGNACIO
- 16068371L**

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MIGUEL DEL CORRAL
IGNACIO - 16068371L
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