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23



SUSTAINABILITY  
REPORT



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This Sustainability Report responds to the requirements of Law 11/2018, of 28 December, which transposes into Spanish law Directive 2014/95/EU of the European Parliament regarding the preparation of the Non-Financial Information Statement. It is an integral part of ACCIONA Energía's Consolidated Management Report for the 2023 financial year.



# 01

ONLY IN RENEWABLES

## Only in renewables

More than 30 years boosting the decarbonisation of the economy

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies<sup>1</sup>, with no ties or legacy related to fossil-fuel technologies.

### RENEWABLE ENERGY FOR A SUSTAINABLE PLANET

ACCIONA Energía has a consolidated geographical and technological presence and a track record of more than 30 years in renewables alone. With 13.5 GW of 100 % clean energy, the company operates in 25 countries on the 5 continents. It has a unique identity as a diversified company integrated into the entire value chain for renewable energy, from the development, financing, procurement, engineering and construction, operation and maintenance, and the marketing and sale of electricity and energy-related services.

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.

The company has a robust platform of renewable electricity generation assets, making a total of 13,521 MW, of which 69 % use wind technology, 22 % solar photovoltaic, 6 % hydroelectric, and 1.4 % storage, and the remaining capacity takes the form of biomass and solar thermal power plants. 43 % of the power is in Spain, and the rest internationally, distributed in the United States, Canada, Mexico, Costa Rica, Chile, Peru, Portugal, Italy, Dominican Republic, Hungary, 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 of renewable projects in geographies such as Southeast Asia or Brazil.

With this, ACCIONA Energía was able to produce around 24.9 TWh, sufficient to supply approximately 7.8 million homes; with prospects for growth in regions such as Australia, India, the United States or Europe.

	2022	2023
Turnover (€ Mill.)	4,351	3,547
EBITDA (€ Mill.)	1,653	1,285
Total installed capacity (MW)	11,826	13,521
Total production (GWh)	23,910	24,894

<sup>1</sup> Source: IHS Markit, excluding China traders.

The company is included in the S&P Global Clean Energy Index and the IBEX 35, and in 2023 DBRS Morningstar and Fitch reaffirmed ACCIONA Energía's credit rating, confirming its capacity for growth and financial strength.

VALUE CHAIN

Project development	Engineering and construction	SUPPLY CHAIN	OPERATION AND MAINTENANCE AND ASSET MANAGEMENT	ENERGY MANAGEMENT
Local hubs with global reach with a team of >100 people.	In-house skills and high quality and high capacity assets.	Large scale purchasing power.	Higher availability than market standards.	Integrated energy management.
Structuring capabilities: tailor-made projects to optimise the cost of energy.	Extensive experience in resource assessment: pioneers in methodology and tools.	Close relationship with manufacturers.	c. 70 % of incidents settled remotely.	Preferred partner of large multinationals.
Early accompaniment of local communities	Team highly renowned for its technical know-how acquired for more than 30 years.	Preferred client of Nordex.	Predictive maintenance for "infinite" useful life.	Global player in corporate PPAs.
		More than +2,800 master supply agreements.	Advanced digital strategy.	Commitment to expansion in marketing, and B2B and B2C energy services.

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.

TECHNOLOGIES AND SERVICES

Over the course of 2023, the company reaffirmed its ability to consolidate and scale its growth in the medium to long term by successfully installing 1.7 GW of new capacity. This figure more than doubles the growth recorded in 2022 and mainly reflects organic growth in the United States (High Point, Fort Bend, Red-Tailed Hawk PV plants, and the Cunningham storage facility), Australia (MacIntyre wind farm) and Canada (Forty Mile wind farm), as well as new investments in Spain, Peru and the Dominican Republic.

Wind power

As pioneers, in 1993 ACCIONA Energía began the construction of the first wind farm in Spain, in Tarifa (Cadiz) and in 1994 it put the El Perdón (Navarre) wind farm into operation, the oldest commercial wind power facility in Spain. ACCIONA Energía currently already ranks seventh in the world in terms of company-owned installed onshore wind capacity, excluding China's operators (according to IHS Markit<sup>2</sup>), with a total of 9,387 MW.

<sup>2</sup> Data from the latest published 'Global Wind and Solar Ownership Rankings' report.

Other milestones in 2023 included significant progress in the construction of Australia's largest wind farm (MacIntyre, 1 GW), the commissioning of the company's first wind farm in Peru (San Juan de Marcona, 136 MWp) and the start of construction of Forty Mile, a 280 MW wind project in Alberta (Canada), with potential for expansion.

ACCIONA Energía and its subsidiary The Blue Circle were awarded five 436 MW wind projects in Thailand this year, and towards the end of the year, together with its partner Freya Renewables, the company was selected by the Philippine government to develop a 160 MW wind farm north of Manila.

## Solar photovoltaic

ACCIONA Energía is today a major international player in photovoltaic solar energy, with 2,951 MW company-owned. 2023, among other milestones, saw the commissioning of PV plants in the United States totalling almost 1 GW (High Point 127 MWp, Fort Bend 317 MWp, Red-Tailed Hawk 464 MWp), in the Dominican Republic (Calabaza 58.16 MWp) and in Spain (Bolarque 50 MWp).

In addition, the company will invest in a new photovoltaic project in the Dominican Republic, which will be the largest of its kind in Central America and the Caribbean, as well as in Australia (Aldoga 380 MWp) and in India, in the state of Rajasthan, which will be its largest photovoltaic plant in the country, with 412 MWp.

## Hydroelectric

ACCIONA Energía has solid experience in this technology, with operating assets over 100 years old. It currently operates 74 owned hydroelectric power plants located in various river basins in Spain with a combined capacity of 868 MW. It includes an 89 MW pumped hydro plant, a valuable storage technology as a manageable backup system.

## 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 CO<sub>2</sub> into the atmosphere per year.

## Energy sales

ACCIONA Energía has been acknowledged by BloombergNEF as having one of the most extensive portfolios of long-term power supply agreements (PPAs) in the world. In 2023, highlights include the signing of a 15-year power purchase agreement (PPA) with Stanwell, the state electricity company of Queensland (Australia) covering the entire output of the Aldoga PV plant, as well as contracts with Zimmer Biomet and Interxion in Spain for 12 and 10 years respectively; new agreements with Fortia in Spain for the supply of all the energy generated at six wind farms for 10 years; and the extension of the contract with Amazon in the United States.

The company is still the largest independent 100 % renewable electricity retailer in Spain, according to data made public by the Spanish National Markets and Competition Commission (CNMC). In 2023, among others, the company signed supply contracts with Acuamed, Iberostar and the Consortium of Universities of Catalonia. On

the other hand, the good commercial performance was also reflected in the new SME marketing business in Spain and Portugal, which already has more than 23,100 active contracts.

## Energy storage

In 2010, the company had already concluded the first European solar photovoltaic facility with energy storage in batteries, and which is now acknowledged as being pioneer in grid-connected storage in wind and photovoltaic plants.

In 2022, it acquired a portfolio of more than 1 GW of battery energy storage in the US and one project, Cunningham (190 MW), came on stream in 2023 as the largest battery project in Texas. In Spain, also in 2023, the company was awarded subsidies from European Union funds through the IDAE (Institute for Energy Diversification and Saving) for the construction of new battery storage projects in Spain.

## 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 parallel, in Spain and Portugal, the joint venture ACCIONA Plug continues to materialise 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 on land adjacent to the Sangüesa biomass plant - owned by ACCIONA Energía - with a 25 MW electrolyser.

Also in 2023, the company promoted *Acciona Nordex Green Hydrogen* 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.

## Energy efficiency

The company designs and invests in solutions that optimise and reduce the energy consumption of public and private customers. In 2023 the company handled the energy management of more than 5,000 facilities in almost 50 countries for public and private customers, equivalent to 1 GWh of energy consumption per year. It also manages more than 50,000 lighting points for Town Councils and industrial plants.

In 2022, the company entered the French energy certificate market, following the acquisition of the French energy efficiency company Ekinov, a business that is already being replicated in Spain following recent regulatory developments that introduce this figure in the market.

Among the most relevant milestones for 2023 are the renewal of the energy management of all the shops of a large *retailer* worldwide, a type of service that optimises energy use and reduces its carbon footprint, through real-time monitoring of its consumption carried out through the company's Digital Energy Services Control Centre.

## Electric vehicle charging

After acquiring Cargacoche in 2021, ACCIONA Recarga has grown consistently in the sector of electric charging in Spain, focusing strategically on urban and interurban charging, and for businesses. The business now has more than 500 locations signed or operational. Also noteworthy is the *joint venture* signed with Qwello in 2022 for the growth of urban charging in Spain, which in 2023 presented the first public charging points in Alcobendas (Madrid).

In 2023, the company reached an agreement with Cushman & Wakefield to install 172 charging points and partnered with Ikea to promote sustainable mobility in Spain by installing 567 public and private charging points in 16 of its centres. Some of these points will be bi-directional charging points with Vehicle to Grid (V2G) technology, an innovative system that allows the electricity stored in the batteries to be recovered for self-consumption or to be injected back into the electricity system. The company began testing this technology in 2022, with its V2G project in the Balearic Islands, the country's first industrial-scale two-way electric vehicle charging network.

## Self-consumption

In 2023 ACCIONA Energía acquired the Spanish company Solideo to boost its self-consumption business for residential customers and SMEs, taking advantage of synergies with different business divisions of the group. Solideo installed around 2,400 residential installations in 2022 and also offers batteries for electric storage, charging points for electric vehicles and aérothermal air-conditioning systems.

In larger-scale self-consumption, among other milestones, in 2023 ACCIONA Energía installed one of the world's largest solar-powered irrigation systems in Montesús (Spain), and signed an agreement with a large industrial customer for a 48 MWp self-consumption plant in Navarre (Spain), one of the largest projects of its kind in Europe.

## New energy and circular economy solutions

The company remains very active in the advancement of new models for optimising renewable energy generation (such as hybridisation or repowering), broadening the offer to customers (such as self-consumption and off-grid generation), and the launching of key technology niches (such as floating wind and solar), in addition to solutions on green hydrogen, storage, electric vehicles and circular economy, following an innovation plan based on studying the most advanced technological trends in the sector.



In 2023, ACCIONA Energía completed its first hybrid renewable plant, in Cuenca (Spain), with a new 29.4 MW photovoltaic installation in addition to the existing 36 MW wind complex. Also in 2023, the company was awarded funds from the Spanish Government's Programme of Strategic Projects for Economic Recovery and Transformation (PERTE), for the repowering of a wind farm in Andalusia, following the first repowering experience with El Cabrito (30 MW) in 2018, as well as for environmental renewal in mini-hydro, and for investment in a pioneering wind blade recycling plant in Lumbier (Navarre), called *Waste2Fiber*. This plant will be built by the *RennerCycle* cluster - aimed at developing integrated wind energy circular economy solutions, in which it participates together with 10 other partners in the sector - to process around 6,000 tonnes of material per year.

In 2023, ACCIONA Energía also launched, together with the fashion brand El Ganso, the marketing of the first trainers with recycled wind blade soles, containing wind turbine glass fibre, and has made progress in the development of a new sustainable storage project using second-life batteries from electric vehicles. This year, the company recovered 97 % of its waste thanks to its circular economy programmes and reduced water consumption by 2 % compared to the previous year, among many other developments.

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 2023, progress has been made in the construction of the first pre-commercial scale pilot, which will have an output of 5 MW.

 For further information on the ACCIONA Energía business model visit the [web site](#)

## SCALE UP GROWTH

ACCIONA Energía achieved an unprecedented rate of growth in 2023, and remains committed to continuing to invest in clean energy in the coming years through a diversified portfolio of projects in terms of geographies and technologies.

In 2023, investment was resumed in India and Canada, and continued to grow in countries such as Australia and the Dominican Republic, to continue to nurture a portfolio that includes projects in nearly 30 countries and in various technologies, including, in addition to onshore wind and solar PV, storage, offshore wind, biomass, and pumped hydro. With this diversified and forward-looking approach, the company has succeeded in establishing its capacity for expansion, adapting to business needs and meeting robust profitability standards.

The company is working to develop assets in countries with long-term growth potential within its operational hubs. As robust foundations to ensure its strong positioning in the sector, the company has defined the following levers that will enable it to maximise profitability:

- Industry-leading asset management that assures and maximises future cash flows, with the goal of extending the useful life of assets through the development of life extension programmes and best practices in digitalisation.
  - The company has a robust digital transformation plan, with more than 100 initiatives for improvements in productivity and efficiency throughout the whole value chain.
- Sophisticated energy management, seeking maximisation of income and minimisation of risks profitability through sale mechanisms diversification: public PPAs, corporate PPAs, *feed-in-tariffs*, market strategies and financial hedging, as well as commercialisation activity.
- To be able to meet the full decarbonisation of end uses, the company offers solutions to decarbonise demand, through the sale of 100 % renewable energy to public and private customers, both in the long term globally and in the short term in Portugal and Spain, where it is the largest 100 % renewable energy supplier according to the National Commission for Markets and Competition (CNMC). It complements this with a wide range of energy services, which enable comprehensive and optimised management of energy use in homes, businesses, municipalities and public institutions, through solutions for vehicle charging, self-consumption and energy efficiency.

## Regenerative boost

In addition to increasing its investment, ACCIONA Energía wants this effort to enhance its capacity to create sustainable positive impacts thanks to doing things differently, which we call “regenerative”.

- We place People at the Centre of our decisions, our designs and our activity. A people management model that includes the people in the organisation, the communities where we carry out the projects and the users and beneficiaries of the infrastructures that we develop.
- Go beyond the traditional -do no harm, net zero- of responsible companies, to address a positive approach, to rebuilding what was lost.
  - For example, the company continues to promote *Nature Based Solutions* (actions to protect and restore ecosystems naturally), with 316,819 trees planted voluntarily in the last three years, which will serve as carbon sinks.
- Demonstrate consistent, authentic, real and constant leadership to be a real example for others, as well as a decisive and active drive of open and exponential innovation to be in the front line of technology and ideas.
- Design taking into account the complexity, inter-connectivity of problems and, therefore, solutions.
- Maintain a purpose-driven approach to the economic and social development of the communities in which it operates, focused on generating a lasting and consistent positive impact over time. This local commitment is reflected in the more than 130 GIS (Social Impact Management) projects developed, exceeding 200 initiatives in 12 countries, with an investment of close to 4 million euros in 2023, and in its social impact management model, which establishes relations with the territory in the early stages of project development, seeking to be a neighbour in the area and meet the needs of citizens and the environment in each specific case.

As part of the company's proactive efforts to forge long-term ties with the host areas of renewable assets, in 2023 it formulated the **"Renewables yes, but only like this" campaign**, which comprises a series of materials and studies aimed at boosting general awareness of the effects and benefits of renewables and their impact at the local level.

This campaign revolves around a video aimed at the Spanish market, acknowledging the implications of the inevitable adaptation of the environment, as well as the environmental and social benefits that outweigh these challenges, through a narrative that portrays renewable energy as 'a new neighbour', one that we would all like to have. It was disseminated through a multitude of social media platforms, reaching over 1.5 million views in total, and was complemented by other **outreach materials targeted at both institutional and local community levels, including a book and information brochures**, as well as the launch of the development of an **international version of the campaign**, to broaden its reach and strengthen global acceptance of renewable energy as an indispensable catalyst for sustainable progress.

## 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 industry and new opportunities. These technologies have proven to be safe, competitive and promoters of local wealth, thus becoming an essential lever to achieving sustainable development goals.

The year 2023 marks the 22nd consecutive year in which new renewable capacity sets records. According to the International Energy Agency, annual global renewable capacity additions increased by 50 % year-on-year to almost 510 GW, the fastest growth rate in three decades.

In addition, in 2023 COP28 pledged to double energy efficiency and triple the global installed capacity of renewable energy to 11,000 GW by 2030, targets that imply significantly increasing the global annual growth rate in renewable energy from the current 6 % to an ambitious 16.6 % in the period 2024-2030, according to *IHS Markit*. This requires adding at least 1,000 GW/year, more than double current annual efforts, according to *BloombergNEF*.

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 million.

This remarkable revolution has marked a turning point, evidenced also by the fact that investment in clean solutions, both in supply and demand, is already double the investment in the oil and gas sector. However, despite this rapid growth, efforts are still insufficient.

To achieve this goal, it is necessary to accelerate the rate of new 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, to enable the right technology balance, 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 addressed 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.

## Unprecedented drive by the public sector towards decarbonisation

Net zero emissions targets would already cover 92 % of global GDP by 2023, geographies that also account for 88 % of global emissions and 89 % of the world's population, according to Oxford University.

In 2022, the global energy crisis triggered an unprecedented acceleration of clean energy in the form of long-term policy support in the United States (with the *Inflation Reduction Act*), the European Union (with REPowerEU), China and Australia, as well as geographies in Latin America and Southeast Asia.

Today, the overall outlook for the clean energy sector is encouraging, thanks to this growing support from public policies aimed at accelerating decarbonisation, ensuring energy independence, and advancing economic growth.

In 2023, developments in Europe stood out, with policies such as the EU's new target of 42.5 % renewable energy consumption by 2030 (up from the previous target of 30 %) and the launch of the Wind Action Plan, which plans to grow wind power to over 500 GW by 2030.

Globally, to stay aligned with the Paris Agreement goals, *BloombergNEF* estimates that annual investment and spending on electrified transport, renewable energy, energy storage and electricity grids must increase at more than double current rates over the period 2024–2030, implying an average global energy transition investment of nearly \$5 trillion per year over this period.

Considering the role that clean energy plays in achieving both energy security and climate change mitigation, it has become clear that further regulatory impetus remains urgent to ensure a secure and fair energy transition and further planning to address the structural challenges of the sector.

## Fast-growing electricity consumption

In advanced economies, the electrification of heat generation, through highly efficient heat pumps, and transportation sectors, such as the use of electric vehicles, will play an increasingly relevant role, together with the rise of new applications for electricity, like the production of green hydrogen or the large consumption centres, such as data centres. This will enable the replacement of fossil fuel technologies and processes, such as internal combustion engines and gas-fired boilers, providing greater efficiency and an increasing impact on emissions reduction as electricity generation is decarbonised.

In addition, companies are playing an increasingly important role in this transformation through the decarbonisation of their operations, which is reflected in a growing business demand for sustainability. Every year, more than 3,300 new companies sign up to science-based targets initiative (SBTi), compared to 500 commitments five years ago. Furthermore, long-term energy sale agreements and consumption commitments 100 % renewable play an increasingly relevant role in the sector, supported by corporations and institutions searching for ways to enhance their environmental sustainability and expand their access to clean energy.

## New flexibility and renewables integration technologies

Storage technologies have emerged as one of the key enablers of flexibility and stability, as it allows storing surplus of energy, minimising curtailment, and injecting that same energy into the grid when wind and solar resources are not favourable 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.

Many governments are now pushing these much-needed backup technologies for system robustness, such as the Australian federal government, which has plans to boost clean storage capacity to 6 GW by 2030; or India, which has set ambitious targets for the development of battery energy storage, with an estimated capacity of between 51 and 84 GW installed by 2032. This acceleration has already been evident in 2023, when the global energy storage market surpassed 100 GWh for the first time, and installed capacity by 2028 is expected to exceed 1 TWh, according to IHS Markit, with systems becoming increasingly efficient and competitive.

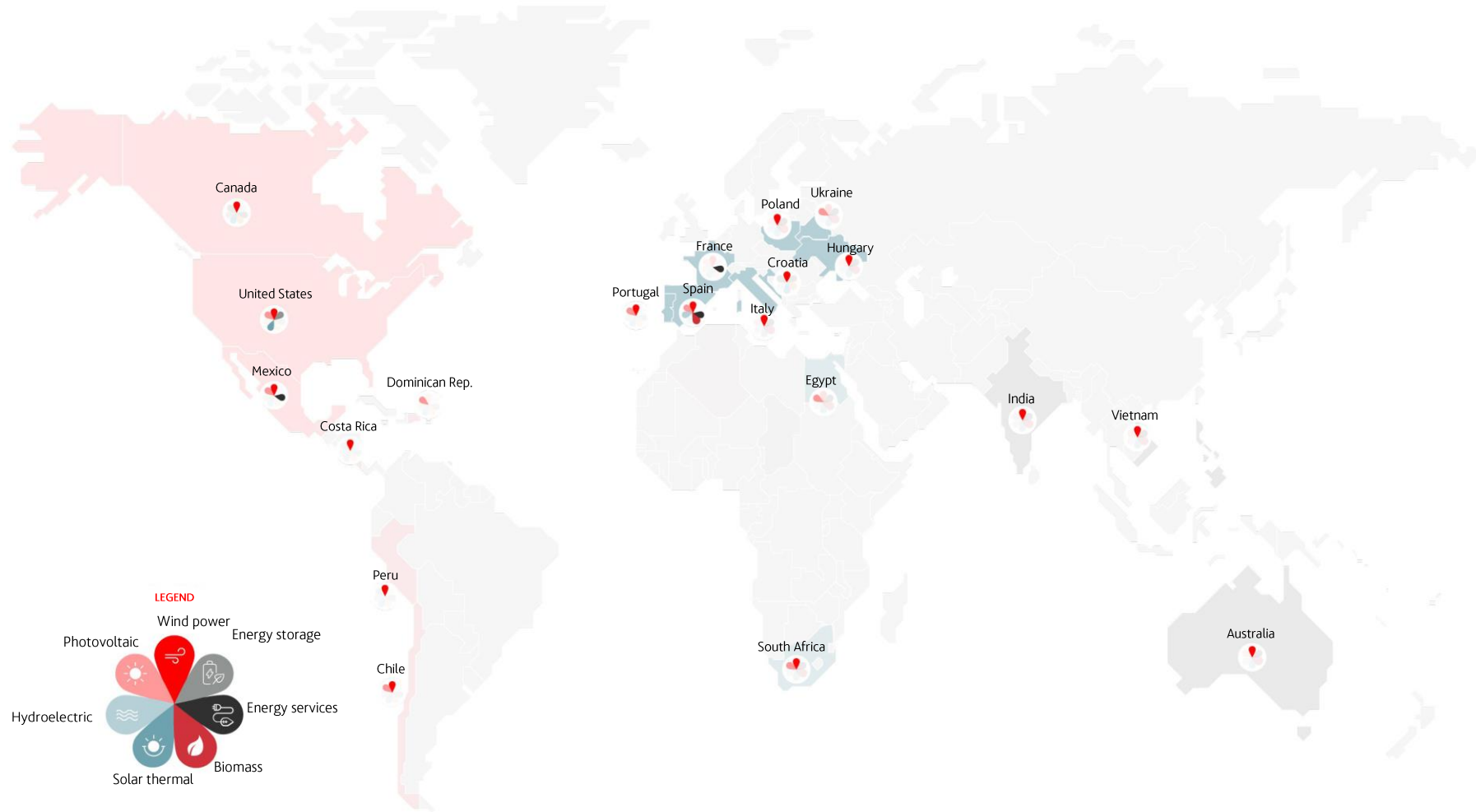
## Expansion of Green Hydrogen

It is an essential vector for the decarbonisation of uses that are difficult to electrify and, given its relevance to the system, some governments have started to provide funding to support the first large-scale green hydrogen projects. Some geographies are leading the way, through schemes such as the US hydrogen production tax credit, the EU's projects of common European interest and the UK's low-carbon hydrogen business model.

This is increasingly raising interest, while efforts are focused on the challenges of fostering demand for green hydrogen and strengthening networks to ensure the connection of the growing demand for renewable energies to produce hydrogen. The International Energy Agency estimates that production by 2030 from the projects announced to date is 50 % higher than it was in 2022, and could reach a green hydrogen production of 38 Mt per year by 2030.

## ACCIONA ENERGÍA IN THE WORLD

Operating in six core technologies, with operations in 20 countries on five continents.



Note: The company provides energy services contracts to companies in Spain, France, Germany, Austria, Poland, Hungary, the UK and Mexico. It also has large-scale renewable projects awarded in the Philippines and Thailand.



INDICATORS	NORTH AMERICA	CENTRAL AND SOUTH AMERICA	SPAIN	REST OF EUROPE	ASIA AND OCEANIA	AFRICA
REVENUES million euros	432	276	2,426	279	75	59
EBITDA million euros	311	64	739	101	20	53
INSTALLED POWER Total MW	4,197	1,166	5,839	576	1,325	418
ENERGY PRODUCED Total GWh	6,710	2,383	11,766	1,059	2,003	973
AVOIDED EMISSIONS thousands of tonnes of CO <sub>2</sub>	3,694	1,810	4,980	586	1,805	754
R&D&i EXPENDITURE million euros	69	29	32	0	0	0
WORKFORCE employees	540	210	1,855	157	274	63

\* Rounded off

## Sustainable transformative innovation

Innovation, as a core pillar of ACCIONA Energía, enables the company to lead the renewable energy sector and decarbonisation, turning social and environmental operational challenges in the sector into opportunities for creating more efficient and productive operational solutions with a positive impact on each project.

ACCIONA Energía's innovation system covers all levels of technological maturity and implements an open, disruptive and digital innovation model. This allows the development of the capabilities, products and services required to design a sustainable reality that is freely accessible and respectful of the communities and environments in which the company operates.

### Commitment to innovation

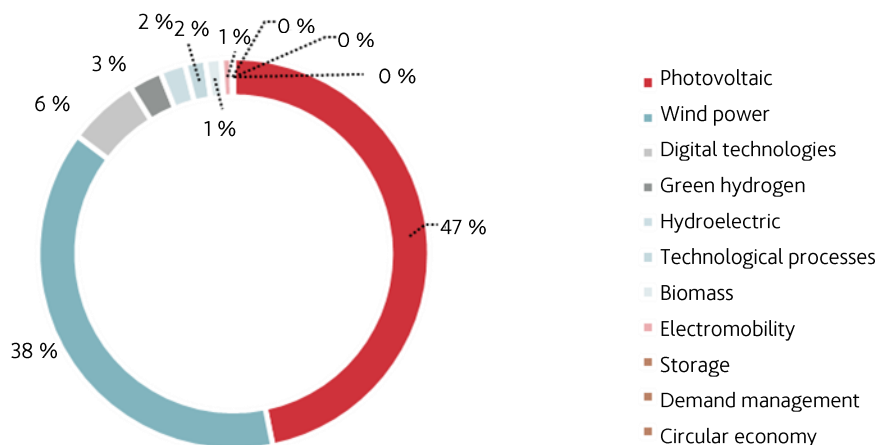
ACCIONA Energía's strategy, put into effect through the Sustainability Master Plan provides an impetus to:

- **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.

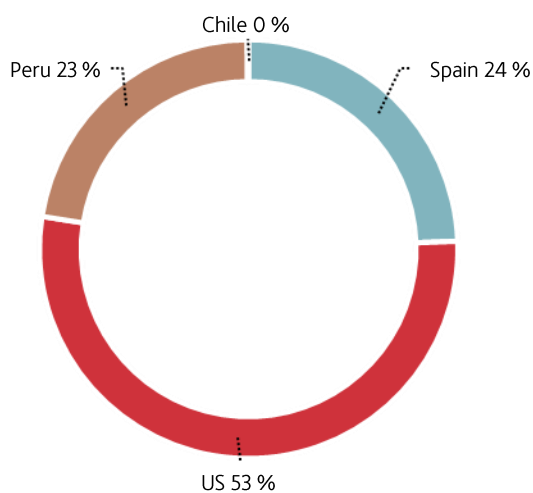
### ACCIONA Energía innovation figure

In 2023, ACCIONA Energía reported spending €129.7 million on innovation, 25 % more than the previous year. The portfolio of projects totalled 74, 41 of which were research projects and 33 innovation projects. The company has carried out 5 projects outside Spain worth €97,9 million, representing 75 % of the total innovation figure reported.

INNOVATION FIGURE PER TECHNOLOGY (%)



INNOVATION FIGURE PER COUNTRY (%)

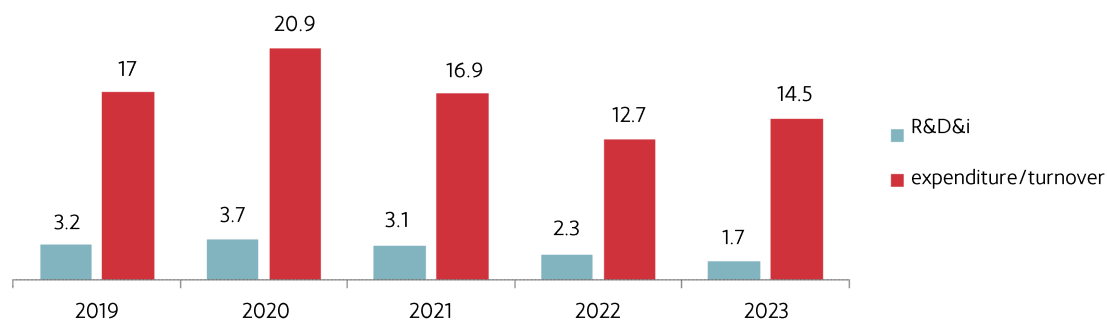


EVOLUTION OF THE ACCIONA ENERGÍA INNOVATION FIGURE

		2020	2021	2022	2023
R&D&i expenditure (€M)		237.0	250.2	262.8	287.5
EU Industrial R&D Investment Scoreboard	141	121	134	121	134
	6	7	7	7	7

\*Consolidated Group figure, ACCIONA Energía accounts for 39.4 % of the total in 2023

EVOLUTION OF ACCIONA INNOVATION INTENSITY (%)\*



\*ACCIONA Consolidated Group figure

The innovation intensity ratio, obtained by dividing sales by innovation spending, was 1.7 % in 2023.

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 2023.

INNOVATION TO TRANSFORM	ACCIONA ENERGÍA PROJECTS
<b>Extending the useful life of assets.</b> Use of computational simulation models and data-driven predictive algorithms to provide advanced information to increase the useful life of power generation assets.	Different problems of wind generation assets have been analysed in order to understand them better and provide more information for O&M decisions. Some examples are: various coatings have been simulated for bolted joint elements, such as the joint between the blade and the bushing, and their effect on the service life of the joint. Another case has been the estimation of the impact of rotor imbalance on the life of structural components of certain turbines.
<b>Maximisation of production.</b> Technological solutions are created for reducing the LCOE (levelised cost of energy) and increasing the electricity produced, without affecting the safety and useful life of the assets.	In order to maximise the production of wind farms, a solution for yaw deviation detection against the real wind direction has been piloted and, based on the results obtained, the implementation of its correction for potential scaling is being evaluated.
<b>Advanced photovoltaic technology.</b> Implementation of new solar photovoltaic technology in both the construction phases and O&M.	Monitoring the environmental behaviour and the production of the floating PV plant in the Sierra Brava reservoir (Spain) has continued and a new membrane technology installation has been prepared for 2024. The development of new technological solutions continues within the project for the agrovoltaic research plant on the canal. Further work is being carried out to implement new technologies at the El Romero Hub (Chile). The project will evaluate the extent to which production is higher than conventional technologies and its potential for use in future commercial plants.
<b>Innovation to ESG.</b> Design and implementation of solutions to minimise ESG risks, and to raise the standards	Technologies to help protect bats at wind farms continue to be tested in the framework of the <i>Chisave</i> project.

INNOVATION TO TRANSFORM	ACCIONA ENERGÍA PROJECTS
in these aspects for all company developments.	
<p><b>Storage and hybridisation.</b> Development and validation of technology that makes it possible to integrate and manage storage systems in renewable energy production plants to substantially increase the inclusion of renewable energy in the grid, and also to take an active part in supplying energy to the auxiliary grid services.</p>	<p>In 2023, the development and validation of a hybrid high-dynamic storage solution based on a <i>Grid Forming</i> system and through hybridisation of lithium-ion batteries with ultracapacitors from wind and photovoltaic generation farms begins.</p>
<p><b>Renewable hydrogen.</b> Complete development of the green hydrogen ecosystem as an energy vector for the decarbonisation of the industry and of society.</p>	<p>Work has continued on the development of the Power to Green H2 Mallorca project, and new decarbonisation projects based on green H2 have been proposed.</p>
<p><b>Electromobility.</b> Technological solutions for the new electromobility and energy management.</p>	<p>In 2023, the Balearic Islands V2G project continued to develop, with the incorporation of more <i>offtakers</i> and users of the two-way charging technology.</p>
<p><b>Offshore wind energy.</b> Development of new pilot projects and prototypes for demonstrating offshore wind energy technology.</p>	<p>ACCIONA Energía is present in the development of two out of the three demo projects of offshore wind turbines chosen by CINEA (European Commission).</p>
<p><b>Waste to industry.</b> Development of circular economy solutions in all aspects related to energy production.</p>	<p>As a continuation of the research into the recovery of biomass slag with two demonstrations of non-intensive road use (at the Celada wind farm and at the Miajadas biomass plant site), ACCIONA Energía and ACCIONA have reused biomass slag from the Sangüesa plant in the construction of a section of the A-68 motorway in La Rioja. Progress has been made in the development of slag recovery for other uses, such as glass manufacturing. Another circular initiative is the reuse of materials from end-of-life wind turbine blades for the production of shoes.</p>

**CROSS-CUTTING INNOVATION**

<p><b>Advanced technologies in operation and maintenance (O&amp;M)</b> Advanced technologies are developed for optimising the O&amp;M of wind, solar and biomass assets.</p>
<p><b>New business models in digital innovation.</b> New energy models based on digital solutions that guarantee the renewable energy source, and also data traceability, governance and administration.</p>

## INNOVATIVE PROCESSING FOR THE RECYCLING OF WIND TURBINE BLADES

ACCIONA Energía and El Ganso have launched a new line of trainers made from recycled wind turbine blades. The product, a limited edition, has been presented under the name "El Ganso x ACCIONA", and has used materials from wind blades that have reached the end of their useful life and have undergone a micronising process to manufacture the sole. This technique, a pioneer in the blade recycling sector, consists of reducing the size of the glass fibre and epoxy resins to microns by means of a mechanical transformation process. The resulting powder is combined with the rubber to produce an outsole that maintains the strength, grip and durability properties of conventional shoes.

The "El Ganso x ACCIONA" model has an exclusive design that includes the brands of both companies and a reference to the origin of the recovered material used to make the sole, reflecting the commitment of both companies to sustainability, circularity and innovation.

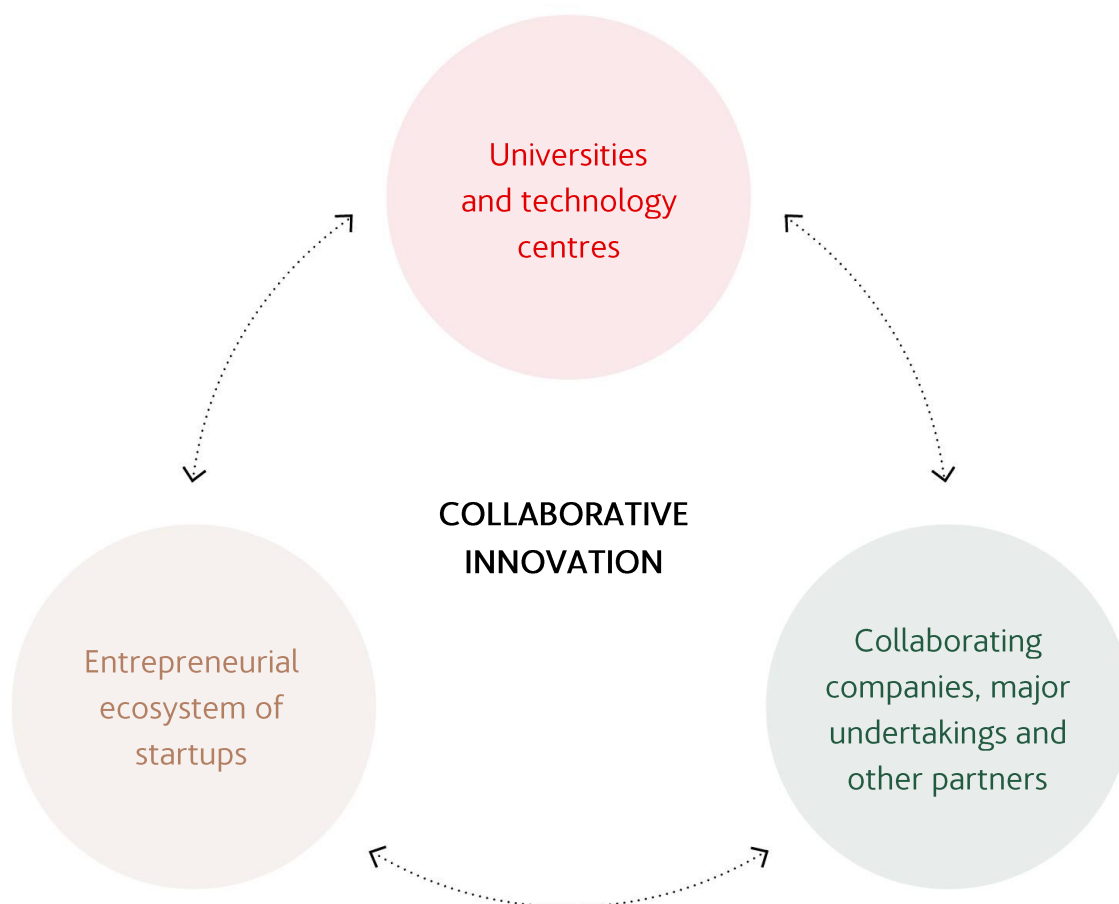
A 23-metre long blade from the Aibar wind farm in Navarre, which has been in operation since 1998, has been used to manufacture this line of shoes. During its useful life, the shovel generated 12,500MWh of clean energy, which prevented the emission of 5,461 tonnes of CO<sub>2</sub> into the atmosphere, equivalent to the absorption of 4,160 trees.

Blade recycling is one of the biggest challenges facing the wind industry as thousands of wind turbines reach the end of their useful life. In Spain alone, an estimated 20,000 blades will need to be recycled in the not too distant future.



## Focus on collaborative innovation

ACCIONA Energía's innovation model attracts the best available talent among employees, startups and external partners.



In 2023, 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, 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. Of note this year was the commencement of open collaboration processes with various universities, such as those of Cantabria, the Autonomous University of Madrid and the Polytechnic University of Valencia, as well as with different research centres, all to resolve specific business challenges, and the integration into the External Business Advisory Committee of the Hydrogen and Fuel Cell Community of the Polytechnic University of Madrid. The company has collaborated with the Catholic Pontifical University of Chile in the launch and study of challenges related to the production and use of green hydrogen, among other lines of collaboration.

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. In 2023, within the framework of the IMNOVATION programme, the challenge of developing chromic materials to signal the presence of voltage and current was launched, involving not only *start-ups* but also European universities and

technology centres, and finally selecting a Latin American *start-up* for its development. Likewise, following the conclusion the previous year of the collaboration project with Red Eléctrica de España and the *start-up HESStec* for the development and experimentation of new advanced grid integration functionalities for hybrid storage systems between batteries and ultracapacitors, a project was started with *HESStec* to advance in the development of a new hybrid *grid forming* synchronous storage that allows grid services with high stability and which has institutional funding from the Spanish Recovery, Transformation and Resilience Plan.

## Main initiatives for dialogue

Among the many and varied dialogue activities carried out in 2023 the following events are worthy of mention:

- Spanish International Renewable Energy Conference (SPIREC 2023)
- 2023 MIT Energy Conference. The role of hydrogen in achieving a Zero Carbon Economy
- RENMAD H2 2023 (Zaragoza)
- RENMAD H2 Chile 2023 (Santiago de Chile)
- Present and future of renewable hydrogen, Ministry for Ecological Transition and the Demographic Challenge in the framework of the Spanish Presidency of the Council of the EU
- WindEurope Annual Event 2023 (Copenhagen)
- *FutuRed* Smart Grids Congress, presentation of the RES+ Project: Hybrid storage system to support renewable energy farms
- Hangar 360: Second International Meeting on Innovation and Entrepreneurship organised by Chile-Spain Foundation (Malaga)
- Web Summit 2023 (Lisbon)
- *VivaTech* 2023 (Paris)
- *South Summit* 2023 (Madrid)

## Open innovation

In the IMNOVATION #Startups programme, the five pilot projects and proofs of concept initiated the previous year were completed in 2023, incorporating proposals submitted by companies from the startup ecosystem such as solutions to the degradation of photovoltaic plants, the monitoring and management of the decarbonisation plan and the development of a platform for collective self-consumption facilities. These *start-ups* were Ingelectus, Synvertec, Impacte, Sinai and Multiverse, selected from among 200 programme candidates.

# 02

## SUSTAINABILITY AND DOUBLE MATERIALITY MANAGEMENT

## Governance of sustainability and materiality

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

### SUSTAINABILITY GOVERNANCE

ACCIONA Energía created in 2021 the Audit and Sustainability Committee that serves as an instrument and provides support to the Board of Directors in the supervision of accounting, financial and non-financial information, the best practices in sustainability, the internal and external audit services and risk management. The Committee meets, depending on its needs, at least four times a year.

#### FUNCTIONS OF THE AUDIT AND SUSTAINABILITY COMMITTEE IN TERMS OF ESG<sup>3</sup>

- 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 non-financial information, both annual and interim, revising compliance with regulatory requirements, the appropriate delimitation of the consolidation perimeter and the proper application of accounting criteria, and raise its reports to the Board of Directors.
- Identify and guide the sustainability policies, rules, commitments, objectives, strategy and best practices. Ensure that Company procedures in environmental and social matters are in line with the strategy and policies set.
- Identify and guide the policies and rules on corporate governance before they are submitted to the Board of Directors. Supervise 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.

<sup>3</sup> Full explanation of the functions, powers and members of the Audit and Sustainability Committee available at: <https://www.accion-energia.com/es/accionistas-inversores/gobierno-corporativo/consejo-administracion-comisiones/>

The main Environment, Social and Governance (ESG) matters discussed at the 2023 meetings were:

- Submission to the Commission of the proposed priorities and objectives of the SMP.
- Review of the Policies included in the Policy Book, update of the Policy on the Operation of the Ethics Channel and the Stakeholder Relations Policy, and approval of the Cybersecurity Policy and the Document Management and Preservation Policy.
- Monitoring of sustainability performance, especially in matters related to greenhouse gas emissions and compliance with the decarbonisation pathway and the carbon budget. Monitoring of social indicators (diversity, inclusion and accident rate), as well as community relations management (social projects developed, beneficiaries, impact).
- Presentation of the new Sustainable Finance Framework and monitoring of ESG ratings updates.
- The members of the Committee had a training session on sustainability and cybersecurity at one of their meetings.

The Statement of Non-Financial Information is submitted for review and approval by the General Shareholders' Meeting as required in Law 11/2018. Shareholders have the opportunity to express their opinion on the initiatives and performance described above. In June 2023, the AGM approved the 2022 report with the votes in favour of 99.95 % of the share capital in attendance.

## POLICY BOOK

The Policy Book, approved by the Audit and Sustainability Committee, contains the commitments and principles of action applicable to all the group companies in economic, social, environmental and good governance terms.

### 1. Sustainability policies

- Sustainability and Innovation
- Economic and Good Governance Sphere
- Social Sphere
- Environmental Sphere

### 2. Other policies: ACCIONA's General Communication Policy, the Board of Directors' Composition Policy, the ACCIONA S.A. Directors' Remuneration Policy, the Policy on Personal Data Protection and Guarantee of Digital Rights in ACCIONA, and the Cybersecurity Policy.

 More information: [Policy book](#)

The Sustainability Management is the area that organises and promotes the initiatives and commitments of the 2025 SMP. This area reports to the Chief Financial and Sustainability Officer (CFSO) and to the Audit and Sustainability Committee. The purpose of the corporate sustainability function is to maximise the impact of the company’s solutions and make ACCIONA Energía’s leadership on non-financial matters visible.

In addition, it relies on sustainability speakers in business areas and strategic markets for the company. This enables it to have direct knowledge of the social and environmental context in different international markets, as well as greater coordination in the implementation of initiatives.

## 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, our presence on well-known ESG benchmarks and rankings or the fulfilment of objectives linked to gender equality and safe working environments.

The purpose of the 2025 SMP is to encourage ACCIONA Energía to re-imagine infrastructures. The company offers a comprehensive solution model for the decarbonisation of the economy, through renewable energy production, energy storage, 100 % green hydrogen production, energy efficiency services and electric mobility. In addition, all of the company’s projects incorporate innovative social and environmental initiatives to increase the positive impact for people and the planet.

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 2023	CHALLENGES IN 2024
Leadership	Create agents of change capable of adding differential value.	<ul style="list-style-type: none"> <li>Definition of 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.</li> </ul>	<ul style="list-style-type: none"> <li>Launch of an online assessment tool for the first phase of the selection process.</li> <li>Deployment of a positive candidate experience plan.</li> </ul>

Diversity	Become a more diverse company, in order to improve resilience and competitiveness.	<ul style="list-style-type: none"> <li>• Launch of innovative programmes for the inclusion of people with disabilities, improving the accessibility of physical and digital environments.</li> <li>• Development of 50:50 programmes that enable the incorporation of female talent in Operation and Maintenance areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Establish an action plan to advance the implementation of the concept of accessibility in the employee experience.</li> </ul>
Recognition	Improve our model, ensuring better recognition of excellence and outstanding effort.	<ul style="list-style-type: none"> <li>• Launch of the <i>International Development Program</i> aimed at boosting key talent and responding to business needs.</li> <li>• The different Academies have promoted technical and transversal learning of key competences and performance in technical areas and/or critical functions.</li> <li>• Evolution of the Performance Management model, with more active involvement of managers.</li> </ul>	<ul style="list-style-type: none"> <li>• Consolidation of the <i>International Development Program</i> at global level in the company.</li> <li>• Expansion of the number of Academies and launch of the Sustainability Academy.</li> <li>• Continue to strengthen the integrated model for Performance Management, evolving the overall Development Conversations process.</li> </ul>
Environment	Have a smart and secure workplace, a reflection of ACCIONA values	<ul style="list-style-type: none"> <li>• Launch of the ACCIONA CAMPUS, a people-centred model that promotes cultural change.</li> </ul>	<ul style="list-style-type: none"> <li>• Extend the scope of the ACCIONA Campus model to the rest of the company's locations.</li> </ul>
Access	Ensure compliance with the fundamental rights of all people involved in our value systems	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Deployment of the GoSupply tool that enables more robust supply chain management, with a special focus on due diligence.</li> </ul>	<ul style="list-style-type: none"> <li>• Implementation of the new GIS+ methodology.</li> </ul>

## Positive planet

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 2023	CHALLENGES IN 2024
Climate	Continue to be a main player in the transition towards a decarbonised economy.	<ul style="list-style-type: none"> <li>• 99.95 % of CAPEX aligned with the European taxonomy for sustainable activities</li> <li>• 77 % reduction in Scope 1 and 2 emissions compared to 2017</li> </ul>	<ul style="list-style-type: none"> <li>• Maintaining the % of CAPEX aligned with the Taxonomy.</li> <li>• Development of the decarbonisation plan for the three scopes.</li> </ul>
Biodiversity	Generate net positive natural capital.	<ul style="list-style-type: none"> <li>• Implementation of LEAP methodology for the identification and management of nature-related dependencies, impacts, risks and opportunities in the company's direct operations, according to the TNFD framework.</li> <li>• Development of projects for "No Deforestation", "Zero Net Loss" and "Net Gain" objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Launch of the process of establishing science-based targets related to nature (SBTN).</li> </ul>
Circularity	Have the capability to develop zero-waste projects	<ul style="list-style-type: none"> <li>• 22 % of the resources consumed have been of renewable or recycled origin</li> <li>• The recovery of waste generated has reached 97 %</li> </ul>	<ul style="list-style-type: none"> <li>• Use 25 % of renewable and recycled resources in own operations.</li> <li>• Maintain recovery rate above 95 %</li> </ul>
Water	Significantly increase the supply of high-quality water and its sustainable use with cutting-edge technology	<ul style="list-style-type: none"> <li>• 10 % reduction in water consumption in water-stressed countries in relation to 2020</li> </ul>	<ul style="list-style-type: none"> <li>• Develop initiatives to reduce water consumption in projects in water-stressed areas.</li> </ul>



## 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 2023	CHALLENGES IN 2024
Authenticity	Share the same values and work towards the same goal in each workplace.	<ul style="list-style-type: none"> <li>• <i>Top Employer</i> in Spain, USA, Mexico, Australia, South Africa, Chile and Peru (new country)</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain certifications and expand their recognition to ensure ACCIONA Energía is recognised as a quality employer</li> </ul>
Sustainable transformative innovation	Develop an innovative, differential, regenerative value in the company.	<ul style="list-style-type: none"> <li>• All innovation projects incorporate some regenerative vector in their design and implementation.</li> <li>• 100 % of the company's facilities have been included in the regenerative performance and impact reporting system.</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusion and development of sustainability challenges within the INNOVATION startup scheme leading to concrete solutions of value for the company.</li> </ul>
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"> <li>• The percentage of female directors on the Board remains at 45 %.</li> </ul>	<ul style="list-style-type: none"> <li>• Increase ESG issues addressed annually by the Audit and Sustainability Committee</li> </ul>
Transparency	Undergo constant scrutiny.	<ul style="list-style-type: none"> <li>• Establishment of the Minerva tool for the definition and monitoring of the ESG budget at project level</li> <li>• More information to suppliers on their performance and areas for improvement, through the Supplier Portal and the GoSupply platform</li> </ul>	<ul style="list-style-type: none"> <li>• Launch of the <i>ESG web reporting platform</i>.</li> </ul>

## 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 2023	CHALLENGES 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"> <li>Development of the regenerative approach to the company's projects.</li> </ul>	<ul style="list-style-type: none"> <li>Development of a pilot implementation of the methodology in a project.</li> </ul>
Sustainable difference in each project	The sustainable difference of ACCIONA Energía is evident in each project.	<ul style="list-style-type: none"> <li>A regenerative project proposal identified in coordination with ACCIONA Agua</li> </ul>	<ul style="list-style-type: none"> <li>Development and presentation of regenerative value proposition</li> </ul>
Regenerative ecosystems	Develop an ecosystem of organisations capable of increasing our capability in terms of regenerative transformation.	<ul style="list-style-type: none"> <li>More than 290,000 people benefited from social impact projects. €4 billion of social investment.</li> <li>Collaboration with benchmarks such as WBCSD, CLG Europe or Climate Pledge, among others.</li> </ul>	<ul style="list-style-type: none"> <li>Improve the tool for measuring the regenerative impact of GIS projects.</li> </ul>
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"> <li>Launch of the ACCIONA and ACCIONA Energía Sustainable Impact Finance Framework that maximises the local impact of projects.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to develop local impact KPIs and implement them in company financing.</li> </ul>

## 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.

The [Stakeholder Relations Policy](#), included in the Social Policies Handbook, identifies the main groups and their needs and expectations to favour the generation of shared value and the establishment of long-term relationships.

### INTERACTIONS WITH STAKEHOLDERS

STAKEHOLDERS*	MEANS OF COMMUNICATION	RELEVANT ISSUES IN 2023
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 and call centres	Creation of communication plans, channels for complaints and claims, community attention resources, dissemination of information and citizen participation
Customers	Call centre, surveys, e-mail, meetings, project managers or sales people, incident and user tracking system, customer relationship management system	Sales process, contract management, technical support, quality and safety of products and services
Suppliers and subcontractors	Supplier Mailbox, Supplier Portal, Procur-e and GoSupply platforms, supplier audits, training channels	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, Earnings presentations, Annual accounts and management report, Sustainability information, E-mail, Call centre and video calls	Integration of ESG issues, transparency, sustainable financing and internal carbon pricing
Shareholders	Website, Results Presentations, Webcasts, Conference calls, ACCIONA Group App, social networks, e-mail, General Meeting.	Decarbonisation targets, directors' remuneration and financial performance
Sustainability group of respondents	E-mail and surveys	Ranking of topics within the sustainability report, usefulness of the information and compliance with the reporting regulations

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

## Stakeholder active listening

During 2023, with the aim of strengthening the topics reported under the new Corporate Sustainability Reporting Directive, ACCIONA Energía has conducted a series of surveys and interviews with external stakeholders who have a relationship with and knowledge of the company's activities. The purpose of these surveys and interviews has been to understand what are the current issues of greatest concern to these groups and what information ACCIONA Energía should be reporting to meet these information needs.

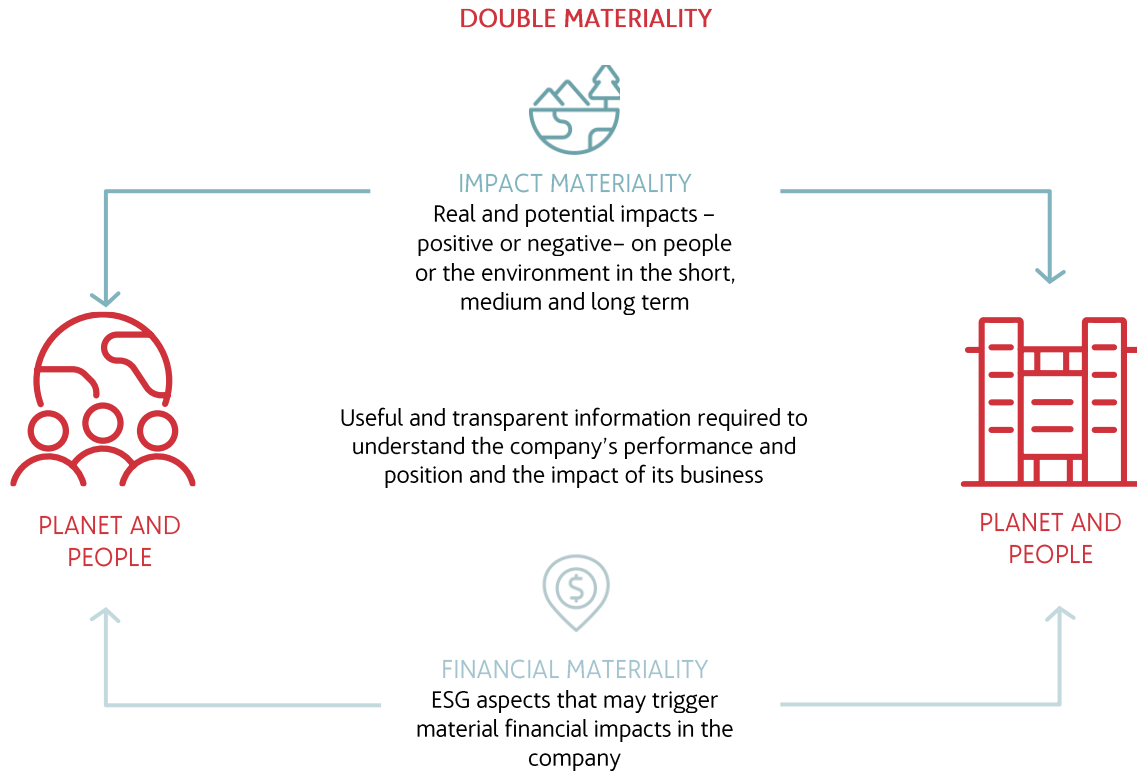
Respondents include a variety of stakeholders, such as academic institutions, financial or lending institutions, regulators or government institutions, non-profit organisations, sustainability-focused entities, as well as suppliers, customers, shareholders and investors from 10 different countries.

From these surveys, a ranking of concerns and the issues on which respondents would like ACCIONA Energía to place more emphasis in its communications has been extracted. These results have been considered in the preparation of this report, ensuring that it reflects the interests and concerns of the company's stakeholders.

SUBJECT ASKED	INFORMATION DEMANDS
Affected communities	Positive impacts, value creation. Human Rights.
Biodiversity and ecosystems	Biodiversity and regeneration strategies. Resource dependency in projects.
Climate change	Decarbonisation strategies, focus on renewable energy use, leadership on climate change.
Resources and circular economy	Waste recovery practices, circular economy initiatives and projects.
Water and marine resources	Providing access to water, protection of marine ecosystems.
Pollution	Air quality, metrics and targets.
Consumers and end users	Communication channels. How end-users benefit.
Value chain workers	Working conditions and controls in the supply chain.
Own staff	Education and skills development, health and safety and working conditions.
Business conduct	Transparency on donations made, connections with non-profit organisations.

## DOUBLE MATERIALITY ANALYSIS

For the second consecutive year, ACCIONA Energía has prepared this Report and the information contained therein, following the principles of double materiality in line with the Corporate Sustainability Reporting Directive (CSRD). This approach encompasses both the company's impacts on society and the environment as well as the potential financial implications of sustainability.



## Phases of analysis (ESRS 2 IRO-1):

### 1. Analysing the ACCIONA Energía universe:

#### 1.1. ACCIONA Energía's activities and business model

The company's activities and business model are described in the chapter Only in renewables. This chapter explores ACCIONA Energía's solutions and their contribution to the objectives of the European taxonomy for sustainable activities and the Sustainable Development Goals, as well as the company's *Business as Unusual* business model. In addition, 'ACCIONA Energía in the world' shows the map of the Company's activities, detailing its global presence and scope.

#### 1.2. Understanding the affected interest groups

ACCIONA Energía carries out an annual review of its map of interactions with its stakeholders, analysing the communication channels and issues addressed to detect trends or new demands for information. In 2023, the company extended this analysis with additional consultations with key external stakeholders, focusing on sustainability concerns and trends.

### 2. Identification of impacts, risks and opportunities (actual and potential) related to sustainability issues

The internal process developed by ACCIONA Energía for the identification of impacts, risks and opportunities extends to both the company's direct activities and operations and its value chain, encompassing environmental, social and regulatory framework factors.

This process includes:

#### 2.1. Identification of ACCIONA Energía's current and potential impacts on the environment

Section IRO-1 of each chapter details the method applied to determine the company's current and potential

impacts on the environment and society, including Human Rights. It has been analysed for the following issues: climate change, pollution, water and marine resources, biodiversity and ecosystems, and resources and circular economy. In addition, ACCIONA Energía's interactions with its staff, workers in the value chain, affected communities, customers and end consumers are analysed in the respective chapters.

#### 2.2. Risks and opportunities of sustainability issues for ACCIONA Energía

ACCIONA Energía carries out various analyses adapted to the specific nature of each risk. For this year's materiality analysis, studies on supply chain risks, compliance risks, climate risk and opportunity analysis, and the global ESG risk analysis have been integrated. Looking ahead, ACCIONA Energía is focused on continuing to integrate different approaches to risks and opportunities.

### 3. Assessment and identification of material impacts, risks and opportunities

#### 3.1. Analysis of impact materiality

The analysis is prepared for the different business areas considering the scale, scope, remediation capacity and likelihood of occurrence of certain impacts. The results are consolidated by the Sustainability Management, which, applying the established thresholds, presents the results.

#### 3.2. Analysis of financial materiality

The results of the different risk and opportunity analysis and management processes are consolidated by ACCIONA Energía's Sustainability Management. Based on the overall conclusions, a specific assessment is made for the Group's business lines. This analysis, enriched with input from the financial areas, determines the potential impact of the main risks and opportunities over the time horizons.

### 3.3. Priority of material topics

Following the materiality analysis, the material issues identified are prioritised. This follows the methodology set out in the materiality assessment implementation guidance published on 22 December 2023, which provides a detailed framework for identifying and classifying the most significant issues for the company.

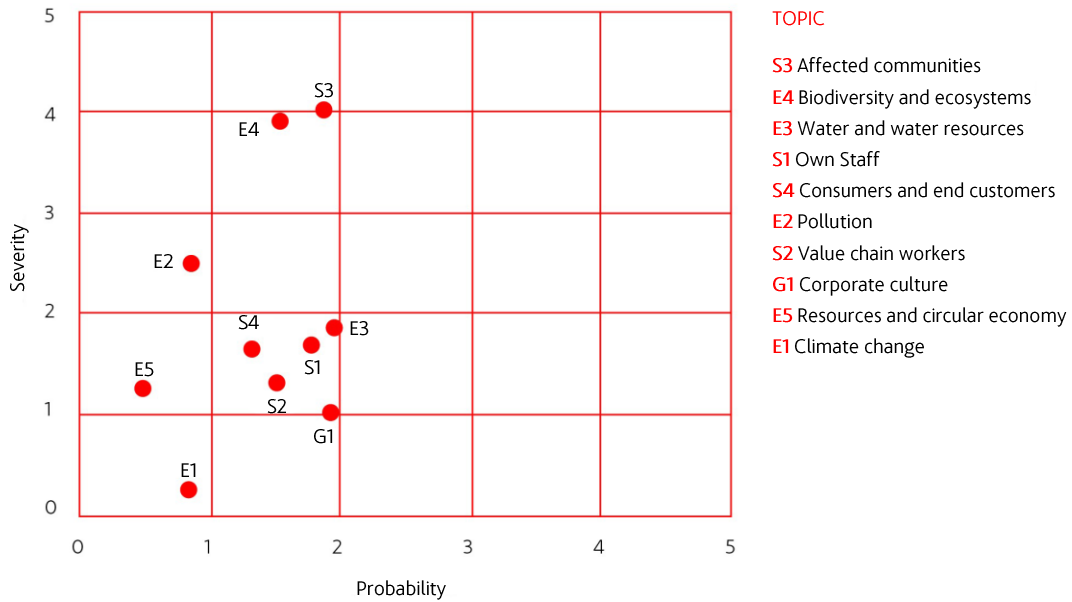
### 4. Validation of the annual materiality findings by the Board of Directors

The Board of Directors reviews and validates the materiality analysis, confirming that the findings and conclusions adequately reflect the company's situation and priorities in terms of sustainability.

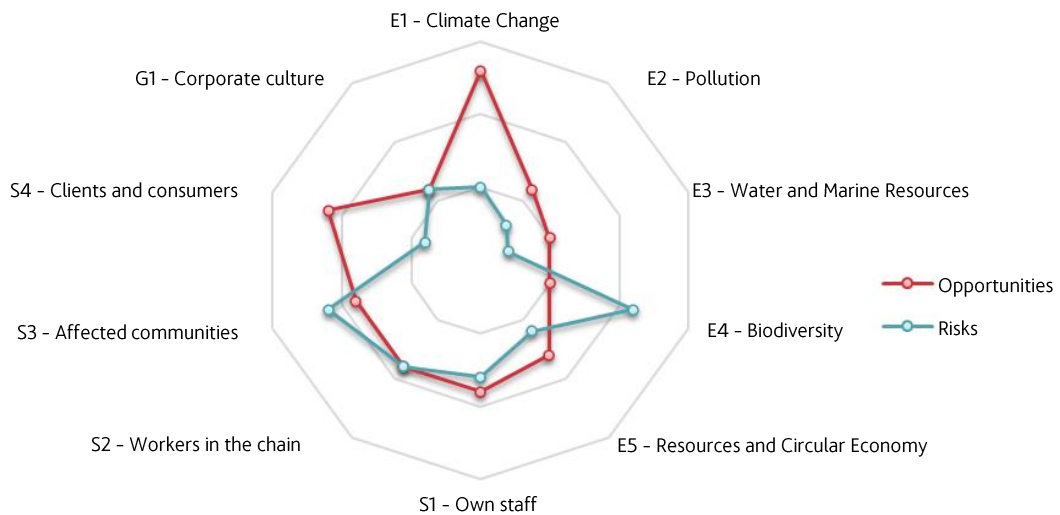
Once the analysis is approved, the identified material issues are integrated into the company's environmental, social and governance management processes.

## Results of ACCIONA Energía's Double Materiality 2023 process:

### IMPACT MATERIALITY



### FINANCIAL MATERIALITY



The table shows the relevance of the information for the renewable energy sector where ACCIONA Energía operates.

## Materiality assessment findings

The most relevant issues relate to: affected communities, biodiversity and ecosystems, water and water resources, own staff, and consumers and end customers. The negative impact related to climate change is not considered material, due to the nature of its business based on 100 % renewable energy generation. However, from a financial materiality perspective, this same aspect is recognised as material and identified as a business opportunity.

## Information on changes to the list of material issues with respect to the 2022 Statement of Non-Financial Information:

This year several of last year's material issues have been merged from 18 (2022) material issues to 10 (2023):

- Climate Change Adaptation and Mitigation Union (covered under 'Climate Change', which also includes the energy sub-theme).
- Linking 'Respect for Human Rights', 'Health and Safety', 'Diversity' and 'Talent Development' as sub-themes under 'Own Staff'.
- Joining 'Responsible Taxation', 'Transparency and Dialogue' and 'Cybersecurity' under 'Business Conduct'.
- 'Data protection' are now covered under 'Customers and End Consumers' as sub-items.
- 'Sustainable financing' comes out as a material issue through the development of different annual reports that report on ACCIONA and ACCIONA Energía's performance in this area.
- 'Innovation' is now considered as a core element of the business model and is developed within the business model chapter under other requirements in ESRS 2.

The full disclosure of sustainability issues, the sub-topics covered and the disclosure requirements covered by ACCIONA Energía, as described in the obligation contained in ESRS 2 IRO-2, are detailed in the European Sustainability Reporting Standards (ESRS) Table of Contents Annex.



## Non-financial risk management

Risk management is an integrated process in ACCIONA Energía's strategic management driven by the Board of Directors. It identifies, assesses and manages events that could potentially impact the company and its business. 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 Audit and Sustainability Committee oversees the company's internal risk control, management and mitigation procedures. The Risk Manager reports to the Financial and Sustainability Manager as well as to the Audit and Sustainability Committee on the complete annual risk management process, including non-financial risks (risk identification, tolerance thresholds, mitigation measures, residual risk, financial impact, etc.). This process is externally audited as part of the verification of non-financial information. Company managers - executive and non-executive- receive annual training on non-financial risks.

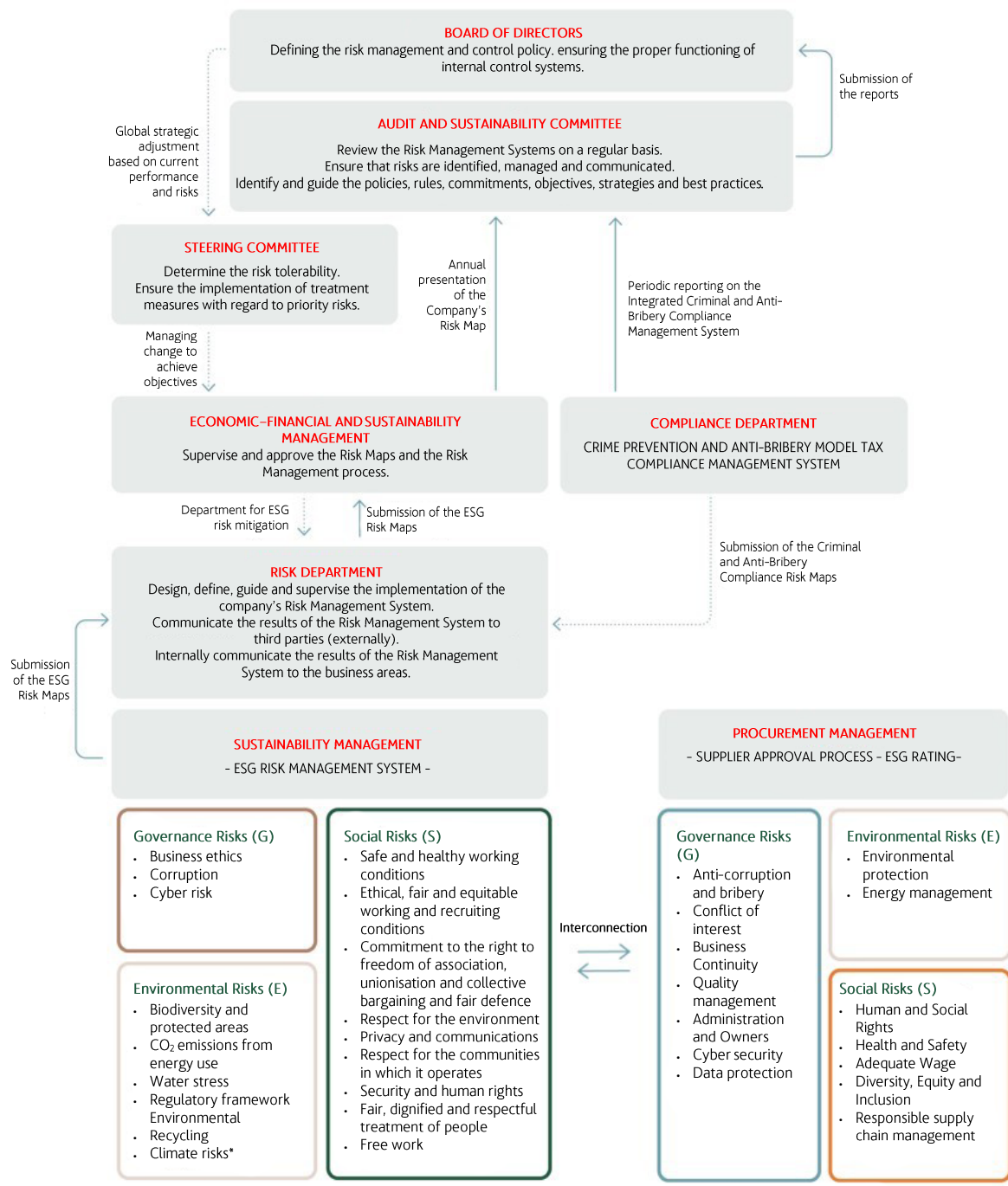
In addition to the Board, the bodies responsible for the different Risk Management Systems are the Audit and Sustainability Committee, the Finance and Sustainability Management, the Compliance Management, the Risk Management, and the company's Steering Committee.

The process of non-financial risk management is carried out on a yearly basis. Each risk event (financial and economic, strategic, operational and unforeseeable) is assessed using criteria such as probability, economic-financial impact, impact on image, impact on sustainability and development, the company's ability to manage it and risk management decided by the company.

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

In addition, the Procurement Management carries out a supplier risk analysis process by assigning a risk level recorded in the Supplier Risk Map. Depending on the risk, different levels of supplier control are established: basic registration, advanced registration, approval process and auditing.

INFORMATION FLOW OF ESG RISKS



\* Environmental Risks related to Climate Change are assessed through an independent procedure

More information: [Risk management system in the Corporate Governance Report](#)

## ESG RISK ASSESSMENT

### Assessment of ESG risks prior to investment approval

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.

### ESG risk assessment for projects in the pipeline

The ESG risk assessment, carried out and audited annually, provides, in the first instance, a materiality analysis of ACCIONA Energía's risks related to the environment, the social sphere and governance. It also provides a better understanding of the potential economic impact on the company of the materialisation of the different risks (tolerance assessment). It also includes risk response measures implemented or to be implemented in the company's facilities.

In 2023, ACCIONA Energía has continued to develop and implement the ESG Risk Management System, which has been externally audited as part of the verification process of non-financial information. The main developments and results have been:

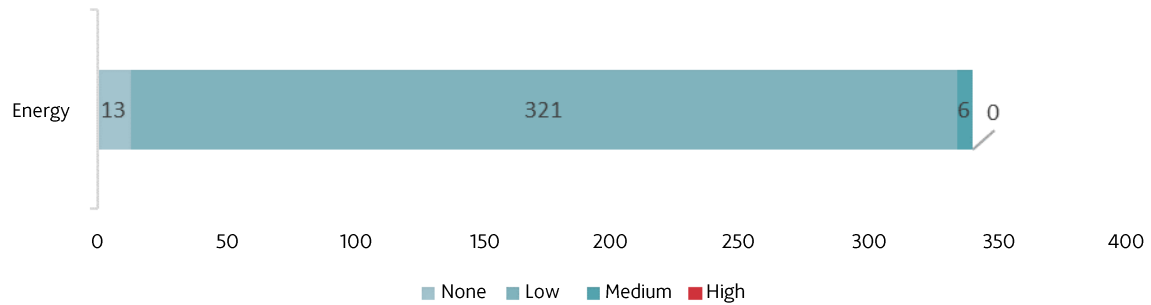
- The definition of common probability assessment and reclassification criteria for all installations and projects in order to achieve high levels of comparability of results.
- The introduction of new social variables, bringing the total to 31 and thus increasing the scope of the evaluation.
- The notable increase in the number of facilities comprehensively assessed compared to previous years, including in the consultation and reassessment process facilities additional to those with a high inherent risk level.
- Further detail on the risk mitigation measures implemented in the projects, as well as a joint review of validation of results and collection of improvements and experiences on the process.

The facilities have been assessed according to their geolocation, the likelihood of risk materialisation and an economic-financial consequence indicator for each of the 31 ESG variables analysed.

This first analysis has made it possible to classify the installations by inherent risk level, prioritising actions on

those that are above the defined tolerance ranges. Regarding this prioritisation a second analysis was conducted in the projects, which allowed us to adjust the first conclusions drawn and investigate the mitigation measures in place against the risks and propose new mitigation measures where necessary.

The results of the second analysis classify ACCIONA Energía's facilities in the following risk levels:

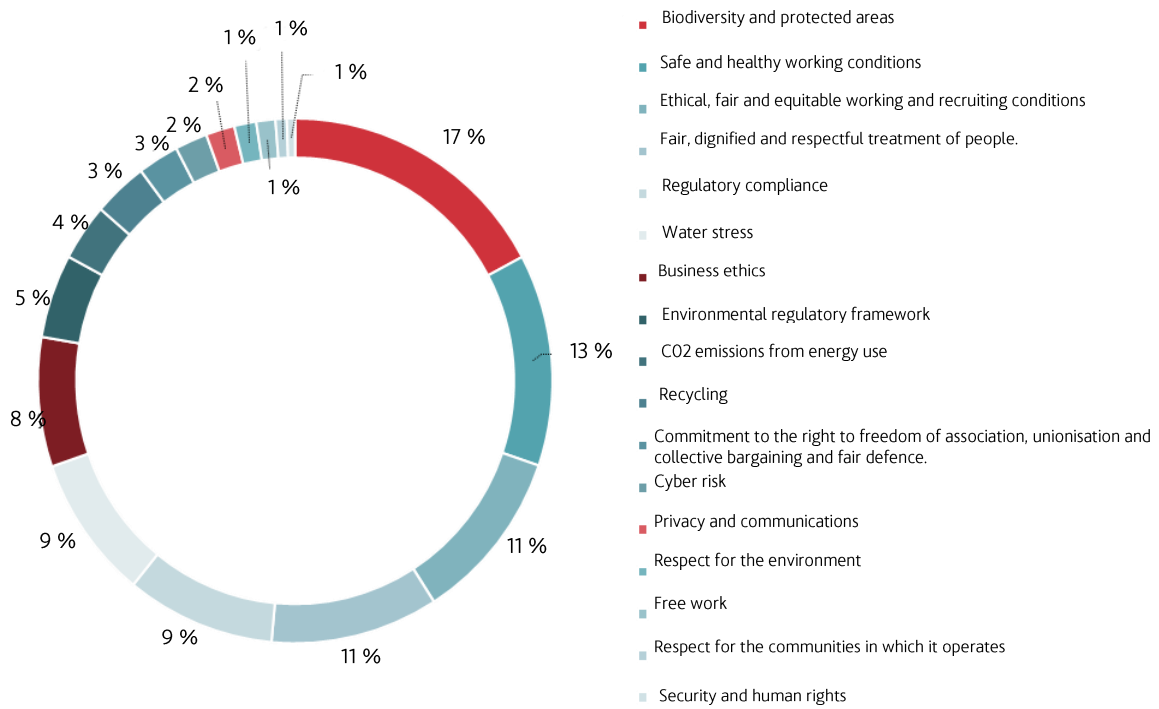


ACCIONA Energía does not have any installations in high risk level, maintaining the results of the previous year.

In terms of average risk (likelihood and consequence), the highest scoring countries are: Dominican Republic, South Africa, India, Peru and Ukraine.

The local contexts of these facilities require more comprehensive measures to mitigate or prevent risk than would exist in a facility with the same operational characteristics, but located in a country with greater social awareness, environmental protection or legal security.

From the perspective of risk indicators, the following results were obtained in 2023:



\* Rounded off

From this graph it can be determined that social indicators comprise the majority of the risk score (47%), followed by environmental indicators, with 32% representativeness, and finally governance, with 21% of the score. Compared to 2022, the compliance risk has decreased significantly from 20% to 9%, mainly due to the registration of mitigation measures in a higher number of installations. Risks such as safety at work and ethical, fair and equitable employment and working conditions gain in significance, while biodiversity and ethical business behaviour remain relevant compared to last year.

# 03

## ENVIRONMENT

## E1 Climate change

2023 has been a milestone in global climatology, with the highest average temperatures on record. This could be the beginning of a worrying trend of record high temperatures, driven by rising greenhouse gas emissions and associated consequences such as the intensification of extreme weather events -unprecedented forest fires, record heat waves and devastating floods- that underline the warnings and scientific consensus on the consequences of climate change.

In order to curb the rise in global temperature, with potentially catastrophic consequences, it is essential to reverse the situation by promoting new, more sustainable development models. Renewable energies, green hydrogen, energy storage, energy efficiency and electric mobility are essential vectors to meet this challenge.

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies. The company presents a unique profile, with a set of solutions for decarbonisation, integrating all the phases of the value chain: development, financing, engineering and construction, supply chain, O&M and energy marketing. This places the company in a unique position to lead the energy transition process to a decarbonised and electrified economy, based on renewable energy sources.

In this global effort, ACCIONA Energía also stands out for its science-based emission reduction commitments, as a pioneer in the renewable energy sector, with no fossil legacy. A business strategy based on investment in decarbonisation solutions aligned with the European taxonomy for sustainable activities.

### **Greenest electricity company in the world for the ninth consecutive year**

ACCIONA Energía has once again confirmed its position as the world's greenest electricity generation company, which it occupies in the New Energy Top 100 Green Utilities ranking since 2015. This ranking is drawn up annually by Energy Intelligence, an independent consultancy firm specialised in energy markets.

The ranking selects over one hundred of the largest electricity companies in the world and classifies them according to their CO<sub>2</sub> emissions and their installed capacity in renewable technologies, to determine their degree of involvement in the energy transition to a low-carbon system.

## GOVERNANCE

ACCIONA Energía has a regulatory and organisational framework in place to manage both financial risks and opportunities and the environmental impacts of its operations, especially those related to climate.

For the integration of climate change management into its business strategy, the company adopts a systematic approach to assess and manage impacts, risks and opportunities. This process seeks to ensure that the risks associated with climate change in operations are kept within acceptable limits, while proactively identifying opportunities arising from the transition to a low-carbon economy.

Advanced analysis (satellite, predictive modelling, scenarios, etc.) and assessment tools are used in this process to enable detailed management of potential events. This includes the implementation of mitigation or adaptation strategies, the assessment of the potential impact (in terms of EBITDA or OPEX) and the Identification of climate-related risks (e.g. potential changes in resource -wind or solar radiation, water shortages, etc.)

At the same time, the company proactively seeks opportunities arising from the global need for sustainable solutions, aligning its business model with 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.

Responsibilities for carrying out this process lie with different teams within the organisation, including risk management teams, innovation and sustainability departments, the business areas and senior management. All play an important role in identifying risks and opportunities, implementing mitigation and adaptation strategies and promoting sustainable innovations.

As the highest supervisory body, the company's Board of Directors and its Audit and Sustainability Committee form the supervisory body in the preparation of risk and opportunity analyses. Its agenda is articulated around a scheme of periodic reviews and evaluations, distributed in quarterly, half-yearly and annual cycles:

### Quarterly:

- Greenhouse gas emissions review and year-end projection.
- Monitoring of the carbon budget (emissions from projects that account for 90 % of ACCIONA Energía's total emissions) and indicators for projects included in the ESG budget.

### Six-monthly:

- Monitoring of decarbonisation plan targets and status of compliance with the SBTi path.
- Monitoring the progress of ongoing decarbonisation projects and initiatives.

### Annually:

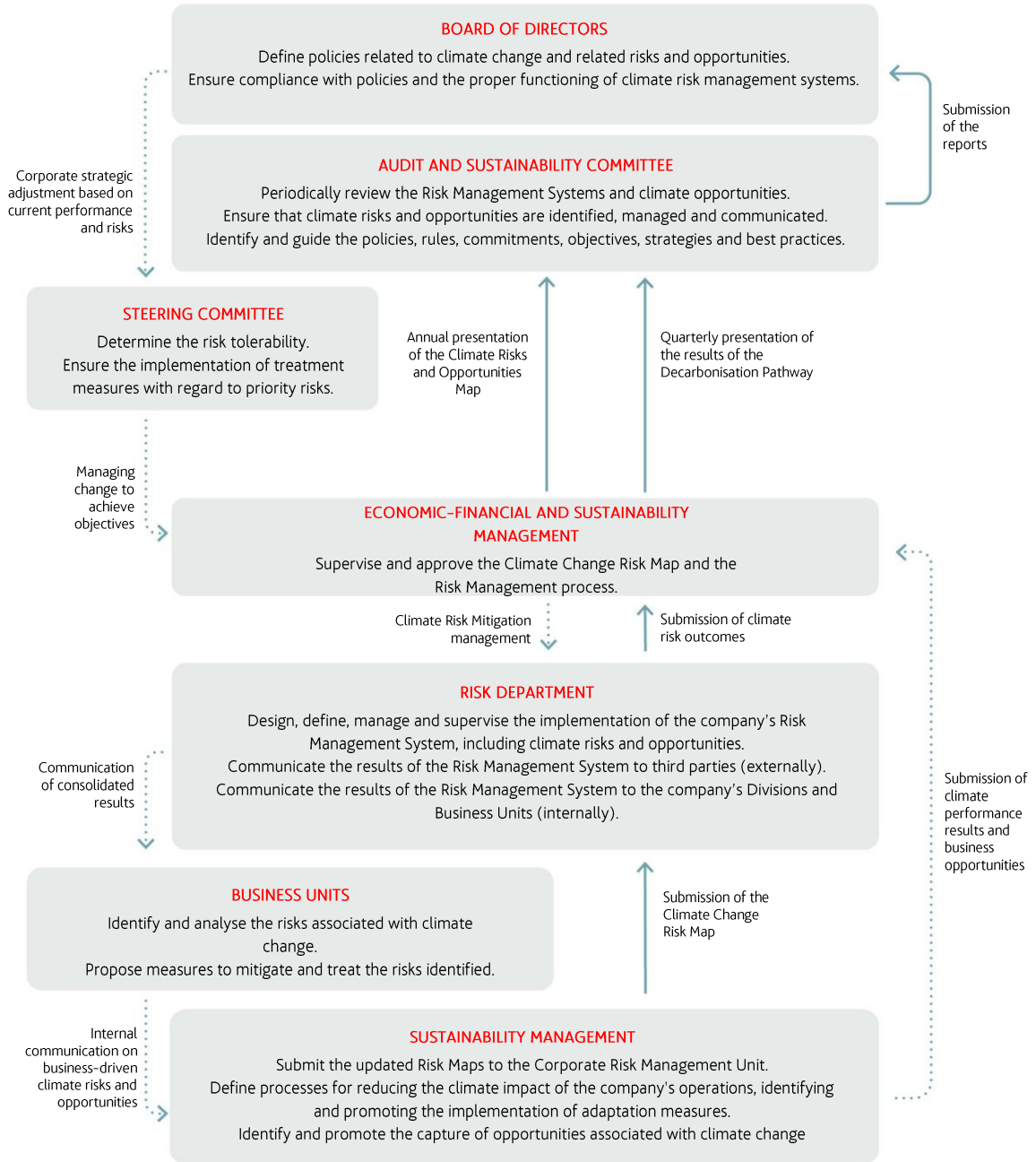
- Drafting of a map for climate risks and opportunities. Monitoring the materialisation of risks and opportunities identified in the previous year and the effectiveness of mitigation measures implemented.
- Approval of the decarbonisation plan for the year. Allocation of carbon budget to projects that account for 90 % of the company's emissions.
- Analysis of the internal carbon price effectiveness.



- Evaluation of incentives related to meeting carbon budget targets.
- Achievement of the objectives of the Decarbonisation Fund projects and selection of the projects to be financed in the following year.

INFORMATION FLOW ON THE IMPACTS, RISKS AND OPPORTUNITIES OF CLIMATE CHANGE

The Board of Directors is the head, directing the overall strategy of the company, overseeing and guiding the actions of management.



## Climate Change Policy (E1-2)

The management of the impacts, risks and opportunities arising from climate change is set out in the Climate Change Policy, which establishes as a priority objective to promote the transition to low-carbon business models that reduce or mitigate the adverse effects of climate change. This includes adopting science-based emission reduction targets and developing projects, products and services that contribute to reducing GHG emissions and facilitate access to renewable energy.

The objective of this policy is to establish the management framework for the company's decarbonisation and climate action strategy, as well as to define the principles of responsible business conduct necessary to identify, assess and manage the dependencies, impacts, risks and opportunities related to climate change mitigation and adaptation.

The policy, approved in 2021, is currently under review by the Audit and Sustainability Committee of the Board of Directors.

This policy applies to all companies within ACCIONA Energía, including subsidiaries and companies, in all geographical areas in which it operates. The company also promotes the adoption of these principles in companies in which it holds a share, even if it does not exercise control in their management or have a majority shareholding, as well as among suppliers, contractors, collaborators and other stakeholders.

⊕ **More information:** [Climate Change Policy](#).

## MANAGEMENT OF IMPACT, RISKS AND OPPORTUNITIES

### Risk Management System

ACCIONA Energía's Risk Management System is a tool integrated into the company's strategy, which allows it to identify, assess and manage events with a potential impact on the company (including events related to climate change). In this way, it guarantees the suitable treatment and control of risks, for them to be maintained within the tolerance thresholds classified as acceptable.

Risk management is a cyclical process that requires regular updating due to changes in the organisation and its environment. The Climate Change Risk Management process (including the analysis of risks and opportunities and internal communication) is carried out once a year and it includes the following processes:

- The Board of Directors, as a non-delegable function under Article 529.ter of the Spanish Corporate Enterprises Act, supports and promotes the Risk Management System so that the Company's relevant risks may be identified, assessed, handled, mitigated and controlled.

⊕ **For more information on the duties and responsibilities of the Board of Directors.**

- As a consultative body, the Audit and Sustainability Committee monitors the adequacy of the system for assessing and responding to material risks identified and reports to the Board of Directors.

⊕ [For more information on the duties and responsibilities of the Audit and Sustainability Committee.](#)

- The Steering Committee is responsible for determining the risk tolerance and ensuring that suitable treatment measures are taken for the priority risks.
- The Risk Management, which is part of the Economic-Financial and Sustainability Management (part of ACCIONA Energía's Steering Committee), is responsible for designing, defining, monitoring and communicating the implementation of the Risk Management System, assigning the team required to achieve this.
- The Sustainability Management, which is part of the Economic-Financial and Sustainability Management, is the executive body that supports the Risk Management for the identification and assessment of the risks related to Climate Change
- The business departments, which fulfil a two-fold role in the Risk Management System, provide the necessary information to identify and assess the risks affecting the company and implement measures to address priority risks, together with the Risk Management.

## Identifying risks related to climate change (IRO-1)

The procedure to identify risks related to climate change is aligned with the European Commission's climate reporting guidelines and the recommendations of the Financial Stability Board, through its Task Force on Climate-Related Financial Disclosures (TCFD), as well as the requirements in the European Sustainability Reporting Standards (ESRS).

### Results

During the risk assessment and management process carried out in 2023, 8 potential risk events related to climate change have been analysed, caused both in own operations and in the value chain (*upstream and downstream*). From this assessment, 8 risk situations have been considered relevant at company level.

There are no significant financial impacts derived from physical or transitional climate risks. The operating model is considered to be robust and resilient to climate change. The risks analysed have a moderately low potential impact and a high impact on opportunities.

In the 2023 risk analysis, the **NGFS scenarios**<sup>4</sup> have been used and the following criteria by risk type and country of operation have been applied:

- In situations where the risk event is of a physical nature, the **Current Policies** scenario is used. This scenario predicts an average temperature increase of 3°C in 2080. Under this scenario, *chronic and acute* risks are analysed.
- For transitional events where the country in which the risk may materialise does not have a Net Zero

<sup>4</sup> For scenario definitions: [NGFS Scenarios Portal](#)

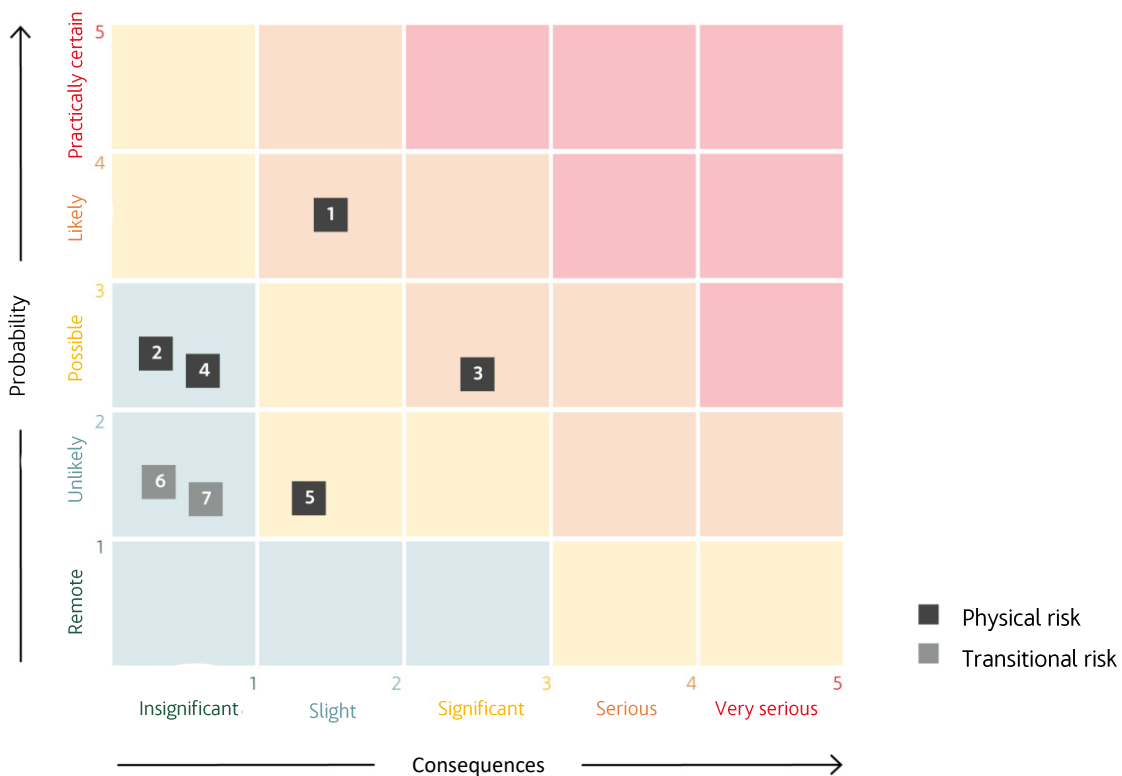
commitment by 2050, the **Delayed Transition** scenario is used. This scenario predicts a mean increase in temperature of 1.6°C to 2050 (with a sudden drop after 2035). These scenarios analyse *Market, Policy and Legislation (current and emerging regulation), Reputational and Technology* risks.

- When the risk event is classified as transitional and, in addition, the country under analysis has a Net Zero commitment to 2050 in its NDCs (*Nationally Determined Contributions*), the **Divergent Net Zero** scenario is used, where the average temperature increase is projected to be 1.5°C by 2050 (with a progressive decrease in emissions). These scenarios analyse *Reputation, Market, Policy and Legislation (current and emerging regulation)* and *Technology* risks.

The **time horizons**, associated with the NGFS climate scenarios, show 5-year intervals from 2015 to 2100. The most common in the climate change risk analyses in 2023 were:

- The forecasts for 2025, with regard to the validity of the company's SMP;
- To 2030, first period of compliance, established on the company's path to decarbonisation; and
- To 2050, time limit for the Net Zero 2050 goal, in general terms.

In addition, when analysing possible risks related to climate change, ACCIONA Energía takes into account those situations and/or geopolitical contexts that could maximise or represent a risk *per se* for the development of the activity analysed.



- 1** Decrease in electricity production from Spanish hydropower plants due to reduced run-off and reduced optimisation of production due to seasonal variation.  
(NGFS scenario: Current Policies. Assessed for 2050)
- 2** Decreased revenues due to reduced efficiency of PV panels in the face of global temperature increases.  
(NGFS scenario: Current Policies. Assessed for 2050)
- 3** Decreased revenues from reduced electricity production from both wind and solar due to changes in precipitation and temperature patterns.  
(NGFS scenario: Current Policies. Assessed for 2050)
- 4** Reduced production capacity and higher operating costs due to temporary shutdowns to repair damage caused by extreme weather events (cyclones, hurricanes, floods).  
(NGFS scenario: Current Policies. Assessed for 2050)
- 5** Decrease in electricity production due to temporary shutdowns due to limitations in the cooling of those plants that do not have a catchment basin and are therefore affected by droughts and variations in rainfall patterns.  
(NGFS scenario: Current Policies. Assessed for 2050)
- 6** 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. (NGFS scenario: Divergent Net Zero. Assessed for 2030)
- 7** Changes in the revenue mix and sources, with a consequent decrease in revenues 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. (NGFS scenario: Divergent Net Zero. Assessed for 2030)

The following is a breakdown of the risk events considered relevant at the company level (E1-9):

NO	COUNTRIES	NGFS SCENARIO/TI MELINE	CATEGORY	SUBCATEGORY	DESCRIPTION	LIKELIHOOD OF OCCURRENCE	FINANCIAL IMPACT	RISK MANAGEMENT
1	Spain	Current Policies. 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	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	Current Policies. Assessed for 2050	Physical risk	Chronic	Decreased revenues due to reduced efficiency of PV panels in the face of global temperature increases.	Possible	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	Current Policies. Assessed for 2050	Physical risk	Chronic	Decreased revenues from reduced electricity production from both wind and solar due to changes in precipitation and temperature patterns.	Possible	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	Current Policies. 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	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.

NO	COUNTRIES	NGFS SCENARIO/TI MELINE	CATEGORY	SUBCATEGORY	DESCRIPTION	LIKELIHOOD OF OCCURRENCE	FINANCIAL IMPACT	RISK MANAGEMENT
5	Spain	Current Policies. 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	Slight (Decrease in sales from 0.5 % to 0.25 %)	The diversification of technologies and geographical areas of ACCIONA Energía's energy activity mitigates the impact of this risk. In addition, the adaptation of existing plant infrastructures, as well as the establishment of adaptation measures in new constructions and studies in the design phase, would concretely reduce the impact of restrictions due to rainfall patterns.
6	Spain France	Divergent Net Zero. 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	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	Divergent Net Zero. 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	Negligible (Sales decrease of less than 0.25 %)	ACCIONA Energía participates in associations that promote and defend electric mobility measures (AEDIVE)
8	Spain	Divergent Net Zero. 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	The economic and financial impact of this risk on ACCIONA Energía is very low, as it is an	



NO	COUNTRIES	NGFS SCENARIO/TI MELINE	CATEGORY	SUBCATEGORY	DESCRIPTION	LIKELIHOOD OF OCCURRENCE	FINANCIAL IMPACT	RISK MANAGEMENT
							incipient business.	

### Analysis of ACCIONA Energía's opportunities related to climate change mitigation (IRO-1)

The identified opportunities already form part of the *core business* of the company, focused on the development of activities that contribute to climate change mitigation and adaptation.

These are the most notable:

N O.	BUSINESS	CATEGORY	DESCRIPTION	GLOBAL CONTEXT	TYPE OF IMPACT	OPPORTUNITY MANAGEMENT
1	Energy	Products and services	Increased revenues from increased demand for renewable generation technologies.	The International Renewable Energy Agency estimates that 90 % of the world's electricity can, and should, come from renewables by 2050.	Increase in income (very high)	ACCIONA Energía maintains its strategy of expanding its renewable generation capacity in a flexible manner over time, taking advantage of opportunities at all times. This strategy of continued expansion will boost revenues. In 2023, 1.7 GW capacity was installed.
2	Energy	Products and services	Higher demand for energy services by industrial and municipal clients.	The IEA defines energy efficiency as the "first push" in clean energy transitions, as it offers some of the fastest and most cost-effective options for mitigating CO <sub>2</sub> emissions.	Increase in income (medium)	Investment in innovation for energy solutions in client facilities. Expansion of the service to new locations and countries.  Compared to 2021, this opportunity meant a 693 % increase in the business turnover aligned with the taxonomy in 2023.
3	Energy	Products and services	Industrial and municipal clients demand new charging points for electric cars.	Annual investment in domestic and public recharging in 2023 is expected to reach USD 37.9 billion, and cumulative investment in the sector will exceed USD 100 billion in the first months of 2024. (Bloomberg, 2023).	Increase in income (medium)	Gradual expansion of ACCIONA Recarga's business presence. This opportunity has meant increasing the volume of taxonomy-aligned sales by 1,479 % compared to 2021.

4	Energy	Use of new technologies	Increased revenues from the introduction of some nine renewable generation sources.	Annual low-emission hydrogen production could reach 38 Mt by 2030. (IEA, 2023) <a href="#">Executive summary - Global Hydrogen Review 2023 - Analysis - IEA</a> .	Increase in income (medium)	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.
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## Risk and opportunity management and analysis methodology

ACCIONA Energía's methodology for identifying climate risks and opportunities uses various tools, monitoring climate variables (historical and projected) in different climate scenarios and with different time horizons at all its facilities.

Monitoring is carried out by means of a combination of tools that integrate the following information, accessible at centre, business area and company level, which can be consulted in an integrated manner:

- **Climate scenarios:** those provided by the latest IPCC (RCP 2.6, RCP 6.0, RCP 8.5) reports and those generated in the Network for Greening the Financial System framework ([NGFS](#)), proposed by the Network of Central Banks and Supervisors for the Financial System. The scenarios NGFS *Current Policies* for physical risk assessment, and the scenarios NFGS *Delayed Transition* and *Divergent Net Zero*, for transitional risk assessment were used as a priority.
- **Time horizons:** according to the company's Risk Management System, the short term is set at a period of less than 1 year, the medium term at 5 years for each Sustainability Master Plan and the long term at 10 years, in accordance with the observations of mega trends and objectives established by science.

In addition to the climate and time scenario axes, they are also taken into account in these tools:

- Production variables.
- Financial variables.
- Emissions per installation.
- Energy consumption.
- References to the climatic policies.
- References to the presence in carbon markets.
- Identification of the activities included in the **European Taxonomy** for sustainable activities (currently undergoing integration).

Other tools used during the identification process and not integrated in the digital models are:

- Tool for the identification of legal requirements.
- Experience of the members of the assessment group on the risks associated with climate change.

The climate change risk management and analysis process is conducted once a year and is structured as follows:

1. Appointment and configuration by the Sustainability Management, in collaboration with the business areas, of an assessment group per business composed of experts, to analyse the climate change risks.
2. The tools mentioned above will be used by the assessment group to propose a battery of climate risk scenarios for each region and type of activity of all company centres and/or groups of centres (or of its value chain), identifying and characterising the following:
  - Climate scenarios
  - Risk sources
  - Potential impacts

This process requires obtaining a representative sample of situations with a climate risk for each centre and/or group of centres.

3. Once defined, each climate risk situation will be assessed, according to a combination of:
  - Likelihood of occurrence
  - Economic-financial consequence
  - Reputational consequence
  - Company capacity to manage the risk
  - Risk management established by the company
4. The graphical representation for each climate risk situation with regard to the variables presented in the previous point will be used to build the Climate Risk Map for ACCIONA Energía.
5. Those climate risk situations with a higher probability of occurrence and economic-financial and/or reputational consequences are considered material. This classification implies 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. These treatment files constitute records for the purpose of facilitating subsequent decision-making, on the most appropriate means of handling each risk.
6. Finally, identified and analysed climate risk situations are integrated into ACCIONA Energía's general Risk Management System, to determine if the level of risk is tolerable, following the hierarchical structure presented in the section on climate governance.

Below are the rating criteria used for the indicators mentioned in Point 3. These are common to any risk assessment and management process carried out at ACCIONA Energía.

INDICATOR	QUALITATIVE SCORING	QUANTITATIVE SCORING	CRITERIA
Likelihood of occurrence	[Remote – Very likely]	[1-5]	Percentage likelihood of occurrence.
Economic-financial consequence	[Non-significant – Major]	[1 -5]	Percentage drop in sales / EBITDA / EBT.
Reputational consequence	[Zero – Very high]	[1 -5]	Impact on activity, on the environment, with regard to Public Administrations or regulatory bodies, impact on the media and on people.
Company capacity to manage the risk	[Low - High]	[1 -3]	Company's risk management capacity, with/without external determining factors.
Risk management established by the company	[Uncontrolled – Strong]	[1 -4]	Economic, operational, procedural and other types of control levels adapted to manage risks.

## CLIMATE STRATEGY

ACCIONA Energía's climate agenda is based on three strategic axes that encompass the company's commitments and initiatives. These pillars seek to ensure that the strategy and business model are compatible with limiting global warming to 1.5°C and contribute significantly to having a positive impact on the planet.

- **Business strategy aligned with the European taxonomy for sustainable activities.** Aligning the investment strategy with activities to mitigate and adapt to climate change so that these entail 90 % of the annual CapEx aligned with respect to the eligible figure -as fitting the EU taxonomy in relation to these two environmental targets.

*Exclusions:* Since its creation, ACCIONA Energía has been committed to not carrying out projects related to the extraction, refining or commercialisation of fossil fuels, including natural gas, any oil refining, or any activity or project with companies that produce them. In this sense, the company has a historical track record of 100 % renewable energy generation, without any link to fossil fuels.

- Fulfilling the pathway to reduce emissions generated by both the company and the supply chain over the 2017-2030 period, in line with the Science Based Target initiative (SBTi) of not allowing global temperature to rise above 1.5°C and becoming Net Zero Carbon by 2040 (Scopes 1 and 2) and in 2050 (Scope 3).
- **Presence in climate action and decarbonisation forums.** The company advocates for the treatment of climate change as an urgency that must be integrated into public policy, promoting conversations and the dissemination of content related to this position. Among the positions it advocates are: the increased use of renewable energy, the establishment of a global carbon price, the provision of funds for adaptation and just energy transition in developing countries, as well as the development of a European taxonomy for sustainable activities.

ACCIONA Energía's Sustainability Master Plan (SMP) includes an area dedicated exclusively to Climate. This plan, in force from 2021 to 2025, defines the specific initiatives and commitments that the company must carry out and fulfil in relation to Climate Change. The Economic-Financial and Sustainability Management, which is

responsible for managing the SMP, reports directly to the Audit and Sustainability Committee on compliance with the SMP.

## Business strategy aligned with the European taxonomy for sustainable activities

This alignment with the European taxonomy for sustainable activities is essential to engage financial markets in the financing of sustainable economic activities. This not only promotes a low-carbon economy, but also facilitates more effective access to sustainable capital and provides the necessary tools to deliver solutions to address climate change mitigation and adaptation, among other objectives.

Within the Sustainability Master Plan 2025, the company set the objective of aligning more than 95 % of its CapEx strategy with climate change mitigation and adaptation activities that are classified within the European taxonomy for sustainable activities.

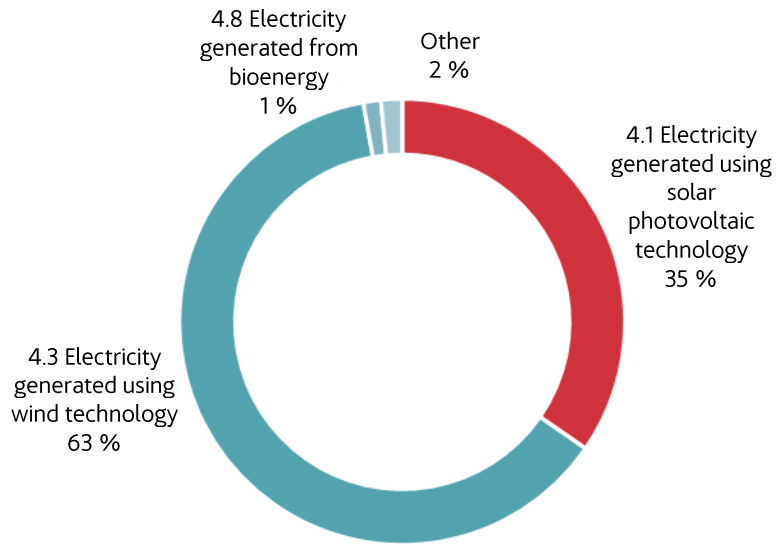
Below is a breakdown of the economic activities classified as eligible, according to their taxonomy:


ADAPTATION AND MITIGATION OF CLIMATE CHANGE **DELEGATED REGULATION (EU) 2021/2178**

		<b>2023</b>			
		<b>TOTAL</b>	<b>ELIGIBLE</b>	<b>ALIGNED (ON ELIGIBLE FIGURE)</b>	<b>ALIGNED (ON TOTAL FIGURE)</b>
<b>CAPEX</b>	%	100 %	97.62 %	99.99 %	97.60 %
	EUR	3,376,821,173	3,296,303,810	3,295,864,671	3,295,864,671
<b>OPEX</b>	%	100 %	92.67 %	98.24 %	91.04 %
	EUR	132,631,667	122,907,951	120,747,861	120,747,861
<b>REVENUES</b>	%	100 %	57.49 %	97.24 %	55.91 %
	EUR	3,547,468,726	2,039,589,936	1,983,260,689	1,983,260,689

The breakdown with the proportion of the different activities that make up the CapEx in line with the eligible figure for ACCIONA Energía is as follows:

ACCIONA'S ACTIVITIES IN LINE WITH THE MITIGATION AND ADAPTATION TAXONOMY- CAPEX




 **More information.** 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 Appendices section of this report.


## Emission reduction strategy


### SOURCE OF ACCIONA Energía's EMISSIONS (IRO-1)

#### SCOPE 3 – Upstream

ACCIONA Energía's main emissions in its supply chain come from the purchase of products, services and raw materials (46 %) and the purchase of capital goods (34 %).

 Photovoltaic panels and wind turbines

 Large components

 Engineering and construction services  
419,582 t CO<sub>2</sub>e

Components and parts of our assets are transported by sea and land. Being the 3<sup>rd</sup> source of Scope 3 emissions (14 %)

 75,078 t CO<sub>2</sub>e

The extraction and processing of procured energy resources account for 3 % of the scope 3


 13,301 t CO<sub>2</sub>e


#### SCOPE 3 – Downstream


ACCIONA Energía's main emissions in its direct activity come from the operation of the biomass and solar thermal power plants and the use of vehicles in operation and maintenance.


- Vehicles 42 %
- Natural gas 31 %
- Biomass 10 %
- Electricity (mix) 9 %
- SF6 leakage 5 %
- Diesel parked 3 %

Operation and maintenance - Scope 1 10,719 t CO<sub>2</sub>e


 The fleet of vehicles required for the maintenance and operation of each of our plants represents 42 % of our total emissions

 Natural gas consumption is the second source of our emissions. This is mainly used for our solar thermal plant, as the heat flux requires preheating. Also for the start-up of one of our biomass plants.

 Biomass combustion generates methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) emissions, the third source of our CO<sub>2</sub> emissions

 SF<sub>6</sub>, with its dielectric qualities, can be found in electrotechnical devices in our installations, ensuring electrical isolation and cut-off functions. Occasional leakage may occur, accounting for 5 % of our emissions


Power consumption - Scope 2 1,079 tCO<sub>2</sub>e


 Electricity consumption is necessary for auxiliary plant consumption when it cannot be generated by self-consumption. 96 % of this consumption is of renewable origin and 4 % of the electricity mix, this being our scope 2.

We have avoided 13.63 M t CO<sub>2</sub>e by our renewable generation

#### SCOPE 3 – Downstream

Employee secondments make up the major source of downstream emissions. They represent 2 % of the scope 3

 Commuting to work 4,500 t CO<sub>2</sub>e

 Business travels 3,973 t CO<sub>2</sub>e

Energy and fuel consumption in facilities without majority financial control are classified in the investment category (0.2%).

 Investments 1,878 t CO<sub>2</sub>e

90 % of the waste is recovered and the remaining 10 % is destined for landfill. Most of the waste generated is inert waste, therefore, emissions in management are minimised.

 Waste 0.12 t CO<sub>2</sub>e



ACCIONA Energía has identified the origin of its emissions, which are distributed between two main activities: (1) the use of vehicles required for operation and maintenance services and (2) the operation of solar thermal and biomass power plants.

Direct emissions (Scope 1) include fuel consumption by the vehicle fleet as the main source of emissions, as well as the production of methane and nitrous oxide from biomass combustion. Scope 2 comes from the auxiliary electricity consumption needed in renewable generation plants and electricity consumption in other facilities.

## Decarbonisation pathway (E1-4)

ACCIONA Energía has an ambitious roadmap, based on the achievement of the emission reduction goals in line with the global initiative Science Based Targets (SBTi), which are compatible with the Business Ambition for 1.5°C to prevent a global mean temperature increase of more than 1.5°C.

The pathway to decarbonisation establishes a 60 % reduction of the direct emissions (scope 1) and those derived from the consumption of electricity (scope 2 – market-based) for 2030 (in absolute terms). In the case of the emissions in scope 3,<sup>5</sup> a 47 % reduction is established for 2030 (in absolute terms), both targets use as a reference the emission figure of 2017.

The company is also committed to achieving Net Zero, which will entail a reduction of emissions in scopes 1, 2 and 3 by 90 % compared to 2017, and the absorption of the residual emissions generated with nature-based solutions.

The decarbonisation strategy has four main pillars:

1. Monitoring, through the **Carbon Budget**, compliance with decarbonisation targets for projects that cover 90 % of the carbon footprint and that must reduce at least 4.6 % of their emissions annually.
2. The calculation of **Weighted Average Carbon Intensity (WACI)** to determine income-related carbon intensity.
3. The implementation of an **internal carbon price** on the basis of which the **decarbonisation fund** is constituted, which finances the most efficient projects in terms of emissions abatement, as well as those that promote energy efficiency, circularity and new business opportunities linked to innovation in decarbonisation.
4. The implementation of a system of **incentives linked to decarbonisation targets**.

	Carbon budget (tCO <sub>2</sub> e)	Scope 1 + 2 emissions (tCO <sub>2</sub> e)	Weighted Average Carbon Intensity (tCO <sub>2</sub> e/M€)		
	2024	2023	2022	2023	% Var.
ACCIONA Energía	17,195	11,799	2.3	3.3	-43.50 %

<sup>5</sup> Categories “Products, services and raw materials; Capital goods; Activity related to energy consumption (not scope 1 or scope 2), Transport and distribution upstream, Employee travel to work and Use of products sold by the organisation” representing more than two thirds of the company’s total scope 3 emissions.

## Carbon internal price (E1-8)

Among the climate change mitigation mechanisms implemented by ACCIONA Energía is the setting of an **internal carbon price**. This mechanism contributes to achieving the company's decarbonisation commitment and serves as an incentive in the transformation of the company's activities and energy consumption towards a fully decarbonised scenario prior to 2040.

This mechanism involves:

- The mandatory preparation of a carbon budget for all installations accounting for 90 % of the company's Scope 1 and 2 emissions. This budget is calculated based on a set internal price as **€7.5/tCO<sub>2</sub>e**, that acts as a shadow price and is subject to periodic updates.
- The settlement per installation of the emissions generated, at a variable price, from **€7.5/tCO<sub>2</sub>e to €190/tCO<sub>2</sub>e**, depending on the achievement of the objectives determined, for their contribution to the **decarbonisation fund** of the company.

In addition, the company has developed and implemented the “**ESG budget in the project**”, which can be used for the early estimation of the changes in certain financial and non-financial indicators at the project level, which can have a potential impact on the attainment of ACCIONA Energía's Sustainability Master Plan.

The ESG budget applies to the projects responsible for 90 % of the company's emissions in scopes 1 and 2, which is updated on a regular basis.

## Decarbonisation Fund (E1-3)

Since 2016, ACCIONA Energía has participated in the ACCIONA decarbonisation fund, financed from the internal carbon price. This fund aims to develop projects that promote the decarbonisation of the company, as well as the acquisition of carbon credits to offset the emissions derived from its direct action.

The funding of decarbonisation initiatives through this fund is made by means of an internal bidding mechanism. In a first phase, together with the different areas of the company, proposals are identified and selected and prioritised according to their potential for mitigation; finally, a committee composed of members of senior management makes the final selection of projects, based on their impact and scalability.

In 2023, ACCIONA Energía relies on 2 initiatives financed by the decarbonisation fund, with a potential to reduce emissions of about 483 t CO<sub>2</sub>e in Scope 1 and more than 151,017 t CO<sub>2</sub>e in Scope 3, and a development period of more than a year for some projects.

The projects structured from the fund are:

### Biogenic CO<sub>2</sub> capture:

Technological analysis of biogenic CO<sub>2</sub> capture in biomass plants for methanol production. ACCIONA Energía has three biomass plants in operation that generate 445,593 tonnes of biogenic CO<sub>2</sub>. In addition, it is in the process of building a fourth plant that will be operational in 2025 and is estimated to produce 482,674 tonnes of biogenic CO<sub>2</sub>. Capturing this biogenic CO<sub>2</sub> 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.

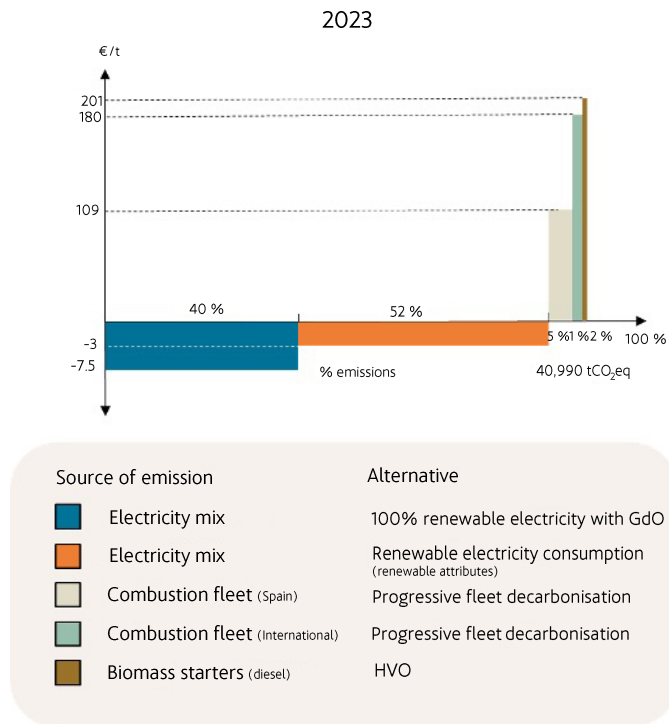
### Use of low-emission fuels in biomass plant start-ups.

Biomass plants use diesel or natural gas for their cold starts. This represents a small percentage of the company's emissions (6 %). HVO (hydrotreated vegetable oil) is a liquid, bio-based alternative fuel made from raw materials from waste oils that can reduce combustion emissions by up to 99 %. ACCIONA Energía is analysing the technical feasibility of substituting diesel starter fuel for this fuel.

### Transition plan for own activities (E1-1)

The decarbonisation plan for ACCIONA Energía's activities identifies solutions for decarbonisation, assessing their effectiveness in terms of abatement potential versus cost. Transition risks arising from the costs associated with the adoption of low-emission technologies, replacement of products or services, or uneconomic investments in new technologies, are mitigated by a detailed assessment of the efficiency of different abatement measures, based on their abatement cost.

Below is the abatement cost analysis of ACCIONA Energía's carbon footprint during 2023, highlighting the main decarbonisation strategies identified:



These measures cover 88 % of potential emissions in 2023

This graph shows the cost in euros of abating each tonne of CO<sub>2</sub>e generated in ACCIONA Energía's activities. Each coloured bar represents a decarbonisation initiative. On the vertical axis is the price per tonne while the horizontal axis represents 88 % of the emissions potentially emitted by the company in 2023. The area of each region is the total cost of abating CO<sub>2</sub>e from that emitting source.

In addition to the decarbonisation projects financed by the Fund, the company is developing projects to decarbonise its scope 1:

*Silvia María Garrido Gardé*  
 SILVIA MARÍA GARRIDO GARDÉ  
 Traductora-Intérprete Jurada de INGLÉS  
 N.º 1081

- Pilot project for the installation of 2 dry air cells to replace the SF6 cells at the Bolarque PV plant. While the solution is technically feasible, it is not economically viable at this time, as the abatement cost is very high. Given that SF6 emissions represent only 5 % of emissions, once the technical feasibility of the solution is proven, this technology would only be deployed when the cost of these cells decreases.
- Continuous measurement of emissions in the chimney of biomass plants to optimise combustion parameters in the boiler to reduce CH<sub>4</sub> and N<sub>2</sub>O emissions.
- Zero-emission buildings. Following technical and economic feasibility studies, a zero-emission building solution has been implemented, by means of self-consumption, in the Isola-Santa Ana wind farm.
- Decarbonisation of the vehicle fleet: through the following initiatives:
  - Electrification of the fleet in Spain: There are currently 172 total vehicles in production in Spain, of which 79 are electric or hybrid.
  - Feasibility analysis of the use of HVO in fleet vehicles: as an alternative to fossil fuels, the technical and logistical feasibility of supplying fleet vehicles in Spain with HVO is being studied with different suppliers.

## CLIMATE TARGETS AND METRICS

ACCIONA Energía has defined an emissions reduction commitment and *Net Zero*, aligned with SBTi with a linear pathway with annual intermediate milestones and a 60 % reduction in 2030 for scopes 1+2 and 47 % for scope 3 (2017 base).

Net Zero has been set for 2040 for its Scope 1 and Scope 2 (market-based) emissions and for 2050 for its Scope 3 emissions.

Regarding its own operations, the company is committed, at a strategic level, that at least 95 % of its eligible CapEx is aligned with the climate change mitigation and adaptation objectives included in the European taxonomy.

In 2023, the intermediate goal of reducing GHG emissions in scopes 1 and 2 was set to 27.7 % and to 21.7 % for scope 3, remaining on the path of reducing emissions set forth as compared to the base year, 2017.

### Scope 1 and 2 emissions (E1-6)

The emissions generated are calculated according to the criteria defined in the Greenhouse Gas Emissions Protocol (GHG Protocol)<sup>6</sup>, under the financial control scheme, consolidating the emissions corresponding to all GHGs relevant to the company as being CO<sub>2</sub> equivalent: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs and SF<sub>6</sub>. The criteria for the consolidation of energy consumption and other emissions follow the same accounting criteria.

The emission factors used are those indicated by:

- Intergovernmental Panel on Climate Change (IPCC), in the 2006 Guidelines for Greenhouse Gas Inventories
- National Inventory of Greenhouse Gases (GHG) of Spain.
- International Energy Agency.

<sup>6</sup> WBCSD/WRI, 2004. Greenhouse Gas Protocol: a Corporate Accounting and Reporting Standard.

## ACCIONA Energía

- Red Eléctrica de España (the Spanish grid operator).
- ACCIONA Green Energy.
- The UK Department for Environment, Food and Rural Affairs (DEFRA).
- The European Environment Agency.
- European Renewable Energy Directive (RED II).

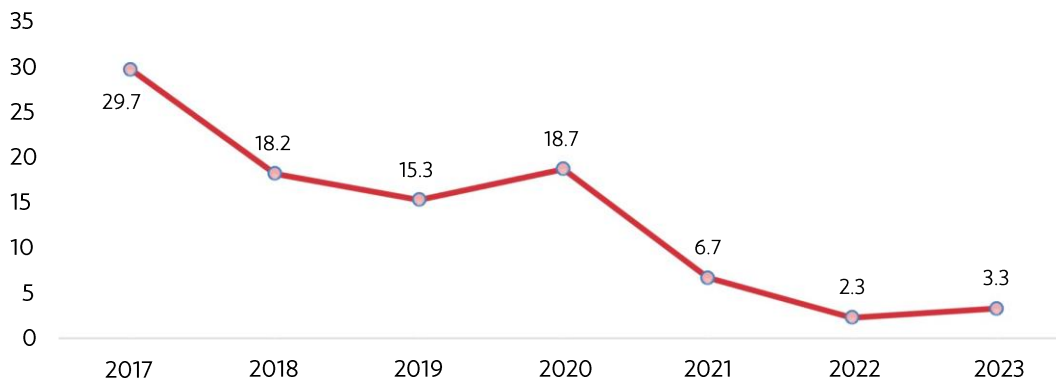
Below are the results for ACCIONA Energía regarding the total emissions in scopes 1 and 2, the evolution compared to 2023 and the emission forecasts for 2024, as well as the intensity ratios and their variation compared to 2023.

	SCOPE 1+2 EMISSIONS (TCO <sub>2</sub> E)			WEIGHTED AVERAGE CARBON INTENSITY		
	2023	2022	% VAR.	2023	2022	% VAR.
<b>ACCIONA Energía</b>	<b>11,799</b>	<b>10,073</b>	<b>+17.1 %</b>	<b>3.3</b>	<b>2.3</b>	<b>43.7 %</b>

To calculate the variation percentage (%) we used all decimals.

## CARBON INTENSITY PATHWAY SCOPE 1 AND 2 PER SALES FIGURE

The intensity of the Scope 1&2 emissions was 3.33 tCO<sub>2</sub>e/€M sales in 2023.



## EVOLUTION OF COMPLIANCE WITH SCOPE 1 AND 2 EMISSION TARGETS (tCO<sub>2</sub>e)

  
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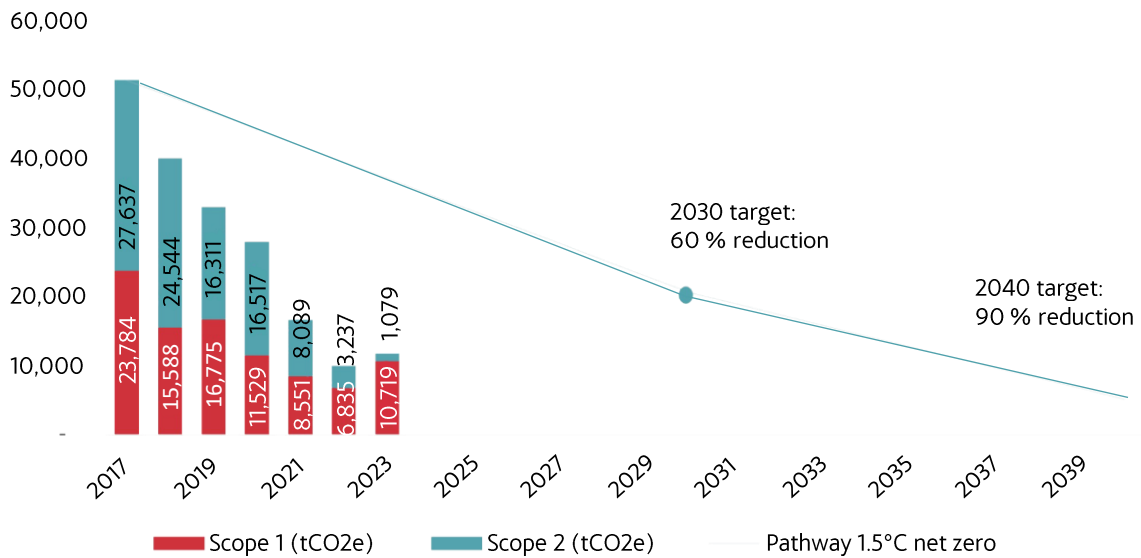
In 2023, ACCIONA Energía's Scope 1 emissions reached 10,719 tCO<sub>2</sub>e and the Scope 2 market-based emissions reached 1,079 tCO<sub>2</sub>e.

The total of ACCIONA Energía's Scope 1 + 2 emissions represents 77 % less than the base year 2017, thus complying with the company's decarbonisation pathway in line with its science-based target (SBT) for 2030. At the same time, the location-based Scope 2 emissions stood at 44,720 tCO<sub>2</sub>e.

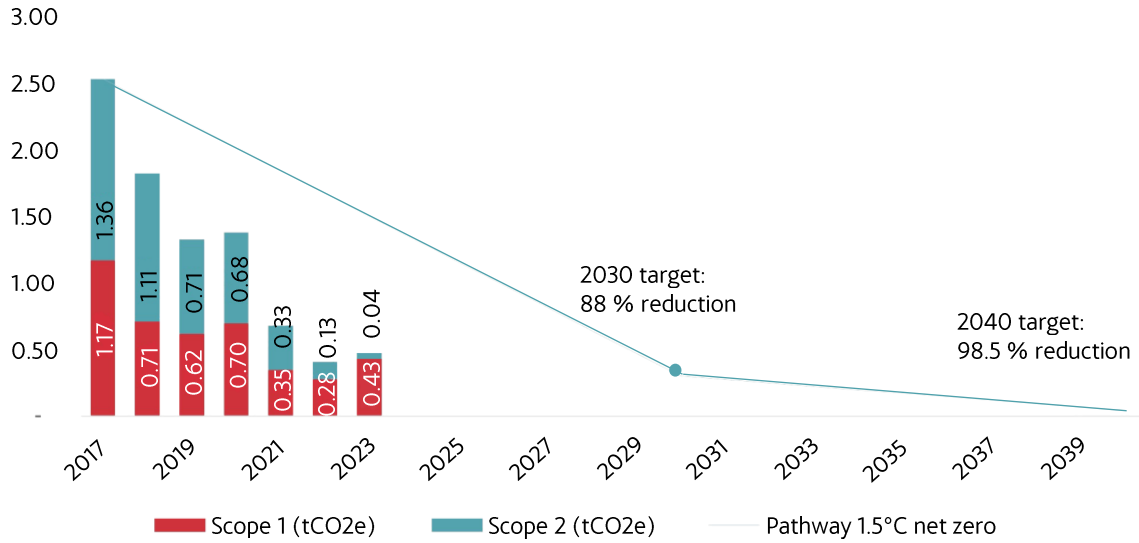
None of ACCIONA Energía's activities are regulated under schemes involving the use of emission rights.

The increase in emissions in 2023 for scopes 1+2 is mainly due to the incorporation of fleet vehicles, previously considered under scope 3, into the perimeter.

The decrease in Scope 2 emissions is due to the increase in renewable electricity consumption, which accounts for 98 % of total electricity consumption.



[CARBON INTENSITY SCOPES 1 AND 2 FOR ENERGY PRODUCTION]



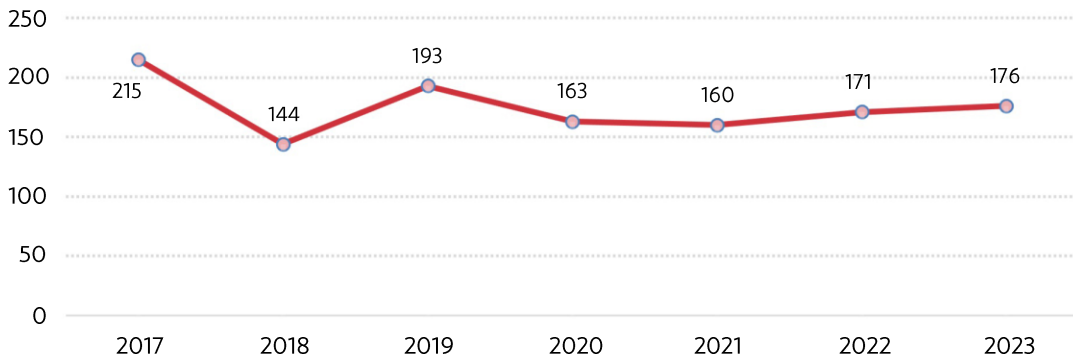
Scope 3 emissions (E1-6)

In 2023, ACCIONA Energía set a science-based target for reducing Scope 3 GHG emissions by 21.7 % on the base year 2017 for the following group of categories: Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Transport and upstream distribution of water; Employees travel to work and Use of products sold by the organisation.

	2017	2018	2019	2020	2021	2022	2023	2030
<b>Target (tCO<sub>2</sub>e)</b>	371,555	358,122	344,689	331,256	317,8222	304,389	290,956	196,924
<b>Emissions 6 categories (tCO<sub>2</sub>e)</b>	371,555	315,966	383,215	284,405	396,035	731,336	617,425	

CARBON INTENSITY SCOPE 3 PER SALES FIGURE

ACCIONA Energía's carbon intensity value for Scope 3 stood at 176 tCO<sub>2</sub>e / €M sales.



**BREAKDOWN OF SCOPE 3 EMISSIONS FOR THE RELEVANT CATEGORIES (tCO<sub>2</sub>e)**

CATEGORY	2017	2020	2021	2022	2023
Products, services and raw materials	81,322	71,777	169,391	230,231	231,869
Capital goods	218,507	181,550	211,200	387,185	275,958
Activity related to energy consumption (not scope 1 or scope 2)	29,549	18,350	1,269	22,749	13,301
Upstream transportation and distribution	39,356	10,027	10,034	86,741	85,804
Waste generated in operations	0	1	0	0	0
Business travels	0	0	0	0	3,228
Employee commuting	2,821	2,701	4,141	4,430	5,093
Assets leased to the organisation	0	2,518	0	0	0
Use of products sold by the organisation	0	0	0	0	5,399
Waste from products sold by the organisation	0	0	0	0	0
Investments	1,181	1,075	552	1,185	1,878
<b>Total (tCO<sub>2</sub>e)</b>	<b>372,736</b>	<b>287,999</b>	<b>396,587</b>	<b>732,521</b>	<b>622,531</b>

Figures for 2017 are shown as this is the base year for the decarbonisation targets.

The following items are considered irrelevant for ACCIONA Energía: Downstream transport and distribution; processing of sold products; assets leased by the organisation" and franchises because these activities are not carried out or their emissions are now included in Scopes 1 and 2 or in another Scope 3 category.

Scope 3 emissions figure for these 6 categories went up by 66 % compared to 2017 (2017 figure: 371,555 tCO<sub>2</sub>e), due to increased purchasing activity to fulfil the forecast growth plan. However, emissions have been reduced by 15 % compared to the previous year due to a lower volume of purchases and decarbonisation actions with the supply chain.

During 2023 the company has continued to work with its supply chain to replace products and services with lower carbon options. It is worth highlighting the substitution of road transport services by rail, which has led to a reduction in emissions of 6,460 tCO<sub>2</sub>e in the USA. The company has also signed two agreements with cable and electrical material suppliers with specific targets to reduce its emissions in the short term, through the use of renewable energy and recycled material with a lower carbon footprint.

**[Other GHG emissions]**

**EVOLUTION OF OTHER GHG EMISSIONS (TONNES)**

	2017	2020	2021	2022	2023
Biogenic CO <sub>2</sub>	436,821	459,381	466,788	472,771	445,776
CH <sub>4</sub>	133	46	2	12	11
N <sub>2</sub> O	17	9	7	4	4
SF <sub>6</sub>	0.080	0.055	0.032	0.021	0.024
Refrigerants	-	-	-	-	-

Figures for 2017 are shown as this is the base year for the decarbonisation targets.

**Energy consumption (E1-5)**





OWN ENERGY CONSUMPTION (MWh)

In 2023 ACCIONA Energía consumed 1,506,691 TJ of energy, 97 % of which came from renewable sources.

The company's target for reducing GHG emissions for 2023 (27.7 % reduction compared to the 2017 figure) inherently entails a target for reducing its consumption of non-renewable energy. This goal was attained in the same sense as the scope 1 & 2 emission targets.

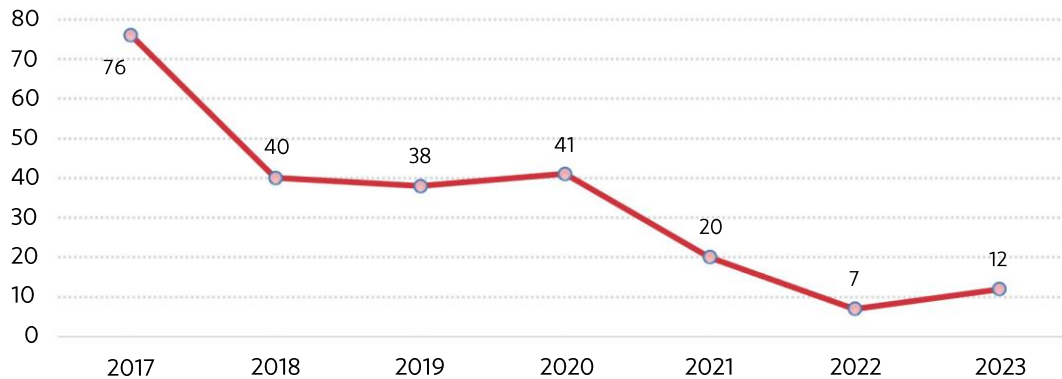
ENERGY CONSUMPTION AND MIX (MWH)

	2020	2021	2022	2023
Biomass fuel	1,249,749	1,271,296	1,287,921	1,237,411
Biogas fuel	0	0	0	0
Bioethanol fuel	0	0	7	72
Biodiesel fuel	0	0	453	663
Total renewable fuels	1,249,749	1,271,296	1,288,381	1,238,146
Renewable Electricity	82,273	249,533	174,774	225,496
<b>Total renewable energy consumption</b>	<b>1,332,021</b>	<b>1,520,828</b>	<b>1,463,155</b>	<b>1,463,642</b>
Diesel	11,317	9,841	7,382	14,176
Natural gas	17,572	16,288	14,100	17,967
Petrol	3	29	93	5,673
Propane	0	0	0	0
LPG	0	0	0	0
<b>Total non-renewable fuels</b>	<b>28,892</b>	<b>26,157</b>	<b>21,575</b>	<b>37,816</b>
Non-renewable electricity	43,206	23,942	11,033	5,233
Total non-renewable energy consumption	72,099	50,100	32,608	43,049
<b>Total (MWh)</b>	<b>1,311,540</b>	<b>1,404,120</b>	<b>1,495,763</b>	<b>1,506,691</b>

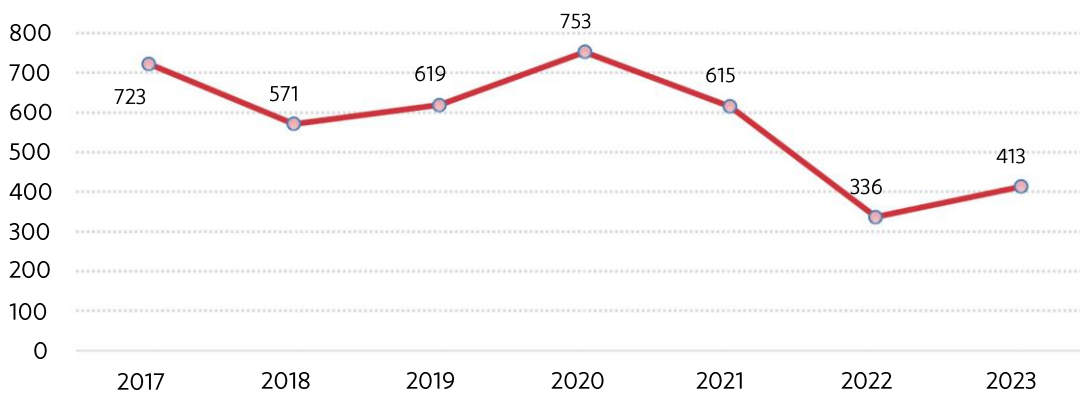
Energy intensity

ACCIONA's total energy intensity in 2023, resulting from the sum of the intensity of energy from renewable sources (413 MWh/€M of sales) and of energy from non-renewable sources (12 MWh/€M sales) was 425 MWh/€M of sales.

NON-RENEWABLE ENERGY INTENSITY BY NET REVENUE (MWH/€M OF SALES)



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



Third-party energy consumption

Below is the most relevant energy consumption outside the organisation, calculated according to the company’s scope 3 categories. The target for reducing Scope 3 GHG emissions of emissions for 2023 inherently entails a target for reducing its external energy consumption.

External energy consumption (MWh)

CATEGORY	2020	2021	2022	2023
Products, services and raw materials	290,306	620,329	952,638	1,025,212
Capital goods	651,159	792,094	1,296,714	710,275
Activity related to energy consumption	115,577	4,848	135,688	77,406

(not scope 1 or scope 2)				
Upstream transportation and distribution	35,148	34,459	274,952	227,968
Waste generated in operations	4	1	0	0
Business travels	0	0	0	12,530
Employee commuting	10,621	16,285	17,427	20,467
Assets leased to the organisation	8103	0	0	0
Use of products sold by the organisation	0	0	0	18,234
Waste from products sold by the organisation	0	0	0	0
Investments	9,047	9,189	8,138	6,715
<b>Total (MWh)</b>	<b>1,119,965</b>	<b>1,477,204</b>	<b>2,685,557</b>	<b>2,081,807</b>

The items Downstream transport and distribution Processing of sold products, Assets leased by the organisation and Franchises are considered irrelevant for ACCIONA Energía either because these activities are not carried out or their consumption is now included in the company's consumption or in another category of external energy consumption.

## Renewable energy production and emissions avoided

At 2023 year end, ACCIONA Energía had 13,526 MW of renewable capacity installed, having generated 24,894 GWh. This renewable production avoided<sup>7</sup> the emission into the atmosphere of 13.6 million tonnes of CO<sub>2e</sub>, 10,801 tNO<sub>x</sub>, 27,630 tSO<sub>x</sub> and 240 tPM<sub>10</sub>.

### EMISSIONS AVOIDED PER COUNTRY BY GENERATING RENEWABLE ELECTRICITY

COUNTRIES	INSTALLED CAPACITY (MW)	PRODUCTION (GWH)	EMISSIONS AVOIDED (TCO <sub>2E</sub> )
Australia	1,077	1,327	1,164,220
Canada	181	466	297,509
Chile	922	2,044	1,536,835
Costa Rica	50	246	216,124
Croatia	30	74	36,984
United States	2,542	2,463	1,427,276
Egypt	186	424	192,626
Spain	5,839	11,766	4,979,817
Hungary	24	45	24,209
India	164	398	361,874
Italy	156	251	123,664
Mexico	1,480	3,781	1,969,407
Peru	136	36	17,755

<sup>7</sup> These emissions correspond to what would have occurred if ACCIONA's electricity production in each country had been generated using the electric-fossil fuel mix.

COUNTRIES	INSTALLED CAPACITY (MW)	PRODUCTION (GWH)	EMISSIONS AVOIDED (TCO <sub>2</sub> E)
Poland	101	222	174,105
Portugal	165	362	133,567
Dominican Republic	58	57	39,153
South Africa	232	549	561,505
Ukraine	100	105	93,537
Vietnam	84	277	278,911
<b>TOTAL</b>	<b>13,526</b>	<b>24,894</b>	<b>13,629,080</b>

\* 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 shown.

## Climate Change Adaptation (SBM-3)

### Analysing ACCIONA Energía's opportunities related to climate change adaptation (IRO-1)

The renewable energy sector also offers opportunities to contribute to climate change adaptation. Some of these opportunities include:

**Distributed energy infrastructure:** The adoption of distributed energy systems, such as rooftop solar panels and small wind installations, can increase resilience by providing local energy sources that are less susceptible to extreme weather events and power outages.

**Reduced demand for water resources:** Renewable energy requires far less water resources to operate than fossil and nuclear technologies, so regions already suffering from water stress with the risk of increased water stress in the coming years will be less affected.

**Solar agriculture:** Combining solar power generation with agriculture (agrovoltaics) not only optimises land use, but also provides shade and improves water use efficiency, which benefits farming communities in a context of climate change.

**Renewable energy for air conditioning:** The development of decentralised renewable energy powered air conditioning systems can be crucial for communities vulnerable to extreme heat waves, improving living conditions and reducing electricity demand at critical periods.

**Innovation in energy storage:** The development of advanced renewable energy storage technologies, such as state-of-the-art batteries, helps to ensure a continuous and stable supply, even during extreme weather events.

**Training:** The communication work carried out in different media, including the most widely used by the young population and future generations, social networks, enables access to informative training on renewable energies and their importance in reducing the effects of climate change.

These opportunities demonstrate how the renewable energy sector can play a key role in climate change adaptation, providing innovative and sustainable solutions to address the challenges posed by rising temperatures and extreme weather events.

## E2 Pollution

The management of water, air and soil pollution remains a key issue in all environmental management systems. With the expansion of industrial and commercial operations to meet society's growing demands, environmental impacts have intensified. The uncontrolled release of toxic pollutants, harmful emissions and industrial waste has led to significant degradation of natural environments, affecting water, air and soil quality. This phenomenon not only poses risks to human health, but also poses serious threats to biodiversity and the sustainability of the planet.

In this context, ACCIONA Energía effectively and sustainably addresses the prevention, mitigation and compensation of the environmental pollution generated, in order to ensure a balance between economic development and environmental preservation.

### MANAGEMENT OF IMPACTS, RISKS, AND OPPORTUNITIES

#### Analysis of ACCIONA Energía's pollution-related impacts (IRO-1)

Air, soil and water pollution can originate from both company processes and accidental events. ACCIONA Energía therefore carries out an annual evaluation and compilation of information on incidents related to the environment and occurring in the area of projects.

The following potential sources of impact are identified in the activities carried out by ACCIONA Energía:

1. Emissions of polluting gases into the atmosphere:  $\text{NO}_x$ ,  $\text{SO}_x$  and  $\text{PM}_{10}$  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.
2. Occasional leaks: the presence of  $\text{SF}_6$  in some electrical installations may cause minimal leakage to the atmosphere over time and as the equipment age.
3. 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.
4. Noise and vibrations: construction work on renewable installations is a source of impact.

## Pollution-related actions and resources (E2-2)

The actions implemented by ACCIONA Energía to avoid and remedy these impacts include: the decarbonisation of its business model (fleet electrification, use of alternative fuels, both in operating processes and in the fleet), the implementation of an ISO 14001-certified Environmental Management System, which includes increasingly advanced and effective protocols for the prevention and remediation of accidental discharges or spillage, the adoption of technologies to recover by-products (such as slag or ash) and noise control and prevention measures, among others.

### Pollution-related policies (E2-1)

ACCIONA Energía's environmental policy includes pollution prevention and biodiversity conservation. The company is committed to combating climate change, improving energy efficiency, managing water sustainably, using resources responsibly and applying Circular Economy principles. Compliance with environmental legislation is ensured and environmental objectives are set at all levels of the company.

The guidelines of this environmental policy apply to new projects, including operations not directly managed by the company, *joint ventures* and other agreements, as well as in due diligence and acquisitions. The Audit and Sustainability Committee is the body in charge of ensuring the effective implementation of this policy within the company.

These guidelines are:

- **Reduced environmental impact** – ACCIONA considers environmental aspects in all development stages of the company's activities in order to minimize the impact they could have on the environment, promoting the rational use of resources at all times. That is why we include the environmental component in our decision-making processes, considering the life-cycle perspective when identifying environmental aspects and impacts.
- **Sensitisation and Awareness** – The operational chain of command of assets and projects takes the lead and responsibility for pollution prevention.

 **More information:** [Environmental policy](#).

## OBJECTIVES AND METRICS

### Pollution-related objectives (E2-3)

The company has established in its Sustainability Master Plan the objective of reducing emissions of atmospheric pollutants. IN 2023 The reduction target for NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> is set at 2.5 % compared to 2017 figures.

## Pollution of air, water and soil (E2-4)

ACCIONA Energía breaks down the metrics related to the impacts produced on air, water and soil by the emission, discharge or spillage of potentially polluting substances. In 2023, ACCIONA Energía did not receive any penalties for environmental breaches.

### Air pollution

Air pollution and reduced air quality can originate from emissions other than greenhouse gases. ACCIONA Energía's material compounds include:

#### EVOLUTION OF ATMOSPHERIC POLLUTANTS (t)

	2017	2020	2021	2022	2023
NO <sub>x</sub>	594	687	712	608	497
SO <sub>x</sub>	180	138	125	173	131
PM <sub>10</sub>	9	6	5	5	4

The data represent an overall decrease in NO<sub>x</sub>, SO<sub>x</sub> and PM<sub>10</sub> emissions due to lower activity at biomass installations.

### Water pollution

ACCIONA Energía did not record any environmental incidents involving accidental discharges into the water environment.

### Soil pollution

In terms of incidents involving substances and pollutants spilled on the ground, 2 incidents were reported in 2023 at wind farms due to accidentally spilled oils and lubricants, none of them with significant repercussions for the environment.

All environmental incidents related to spills to soil and discharges to water are recorded in ACCIONA Energía's environmental management tools and properly managed following the guidelines established in the accident containment plans or in accordance with the measures dictated by the competent environmental authorities.

The volumes and management set out below are developed:

	VOLUME DISPOSED (m <sup>3</sup> )	MANAGEMENT
Oil spills	0,8 m <sup>3</sup>	Removal of affected soil and site reclamation

## E3 Water and marine resources

Adaptation to climate change calls for the implementation of clean energy solutions that outperform traditional alternatives, paving the way for widespread access to water for millions, in tandem with the expansion of the renewable energy grid. Although ACCIONA Energía does not have a direct impact on water resources, it is a key player in the sustainable expansion of infrastructures that enable the development of society.

### MANAGEMENT OF IMPACTS, RISKS, AND OPPORTUNITIES

The quantity and quality of water resources vary according to inputs from the hydrological cycle, influenced by factors such as precipitation, temperature, land use and land cover. Water demand depends on climate, available water resources and their management, thus determining sufficiency or scarcity in relation to needs.

ACCIONA Energía implements its water management strategy based on the availability of the resource, its quality and the balance in the ecosystems in which it is present.

### Potential impacts on water resources

ACCIONA Energía is aware of both the benefits of efficient and sustainable management of water resources and the risks of misuse of water resources. It therefore identifies potential sources of impact, classifying them into four thematic areas:

#### 1. Accidental contamination

The use, although reduced, of potentially polluting substances for the performance of the activity, such as fuels, oils, solvents, etc., in the event of accidental spillage, could reach water bodies in the event of being close to one, temporarily affecting it.

#### 2. Alteration of physico-chemical conditions

Biomass 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.

#### 3. Additional and renewable resources

Hydropower and biomass generation stand out for their efficiency, despite the associated water management and demand. In the case of hydropower, although it involves water management, its significant and constant contribution to electricity supply positions it as a reliable and decarbonised source. Both technologies offer crucial benefits in the diversification, sustainability and decarbonisation of the energy mix.

#### 4. Disruption of water flows

The alteration of water flow, natural sedimentation and the controlled release of water are potential sources of impact by affecting the seasonal and daily variability of river flow and the biological dynamics of the adjacent downstream ecosystem.

The company establishes prevention measures to minimise possible impacts on species that might be found in



river ecosystems and other bodies of water, rules for respecting the environmental flow system in line with the technical requirements set by the pertinent environmental authority and it establishes control and assessment mechanisms for efficient management and responsible use.

The processes that guarantee compliance with the requirements for water catchment and discharge are part of the environmental management systems implemented and certified by the company according to the ISO 14001 international standard.

### Risks related to water resources (IRO-1)

ACCIONA Energía currently has two methodologies for identifying facilities in countries or areas with water stress. First, the *Food and Agriculture Organization of the United Nations* (FAO) methodology states that an area is water-stressed when its annual water supply is less than 1,700 m<sup>3</sup> per person. Under these conditions, ACCIONA Energía has 12 facilities in water-stressed countries, including Egypt, India, South Africa and Poland.

On the other hand, the evaluation of the facilities using the "*Water Risk Atlas*" tool of the *World Resources Institute* (WRI) allows local identification and classification of ACCIONA Energía's facilities in seven levels of water stress.

Based on this tool and as part of the ESG Risk Management System, ACCIONA Energía evaluates endogenous and exogenous water factors that could impact the company's operations and services, thus representing a potential risk for their development.

ACCIONA Energía's commitment to reducing its consumption in countries with water stress marks the criteria used in the procedure to identify in which centres water use and consumption is a material aspect, so that it is in centres located in areas with high and extremely high levels of water stress where the management implemented to mitigate these risks is exhaustively evaluated.

Below is shown, firstly, the distribution of ACCIONA Energía's centres in the water stress categories according to their location, and, secondly, the distribution in the water stress categories according to the risk management and mitigation implemented and reassessed by the projects as part of the ESG Risk Management System (inherent risk).

CATEGORY	DISTRIBUTION ACCORDING TO LOCATION	DISTRIBUTION ACCORDING TO MANAGEMENT
Extremely high (>80 %)	72	15
High (40-80 %)	70	0
Medium - High (20-40 %)	128	0
Low - Medium (10 -20 %)	38	6
Low (<10 %)	32	319
Aridity and low water consumption		

The results of the centre-level evaluation indicate:

- ACCIONA Energía carries out 42 % of its activity in areas considered water-stressed. When carrying out the risk assessment on projects, the percentage probability of a water risk materialising due to water availability decreases to 4 %. This is because it is not a material resource in most installations and responsible use and management plans and systems are prioritised.
- 9 % of the activity is carried out in areas with a low level of water stress or in arid areas with low resource use.
- 97 % of ACCIONA Energía's projects/services have assessed the risk of operational impossibility due to water stress as remote or non-existent.
- Taking into account the volume of projects, Spain, Portugal and the United States would be the countries with the highest levels of water stress. However, in average water stress levels, the greatest risk is shifted to countries such as India, Italy and Chile.

The above analysis leads to the conclusion that water risks represent a low impact for ACCIONA Energía.

## Policies on water and sea resources (E3-1)

ACCIONA Energía has a Water Policy approved by the Board of Directors's Audit and Sustainability Committee, the main objective of which is to support the fundamental human right of access to drinking water and sanitation.

The outline of the principles in this policy is:

- Managing water responsibly and efficiently.
- Transparent reporting of the results from the end-to-end water management.
- Complying with current laws and regulations on water.
- Supporting the development of regulatory frameworks which favour the sustainable management of this resource.
- Establishing mechanisms to control and assess the efficient management and responsible use.
- Supporting the development and use of new technologies.
- Including water use and management in the Company's risk management strategy.
- Raising awareness of the sustainable use of water resources through partnerships with stakeholders.
- Transferring this policy to the entire value chain.

ACCIONA Energía will update the Water Policy in 2024 to include several key principles. The first is sustainable consumption, which seeks to promote the efficient use of water in order to conserve and optimise water resources, as well as to encourage the use of alternative sources. This is particularly relevant in water-stressed areas. The second principle is that of Conservation and Rehabilitation, in which ACCIONA Energía undertakes to promote and implement initiatives for this purpose in water bodies that may be directly affected by the Company's projects.

## Actions and resources related to water and marine resources (E3-2)

ACCIONA Energía has carried out a pilot project consisting of the installation of an Atmospheric Water Collector, also known as a "fog catcher", at the Punta Palmeras wind farm. This is an initiative that seeks self-supply of water by harnessing the moisture present in the fog. The device in place, known as AWC (Atmospheric Water Collector) is an evolution of the traditional fog catcher, but its configuration allows for greater efficiency in water generation, obtaining around 6,000 litres per year per device. The water generated is of very high purity as it is obtained from the humidity of the environment.

In the case of the Punta Palmeras wind farm, three AWC units have been installed, generating some 18,000 litres per year, and the water generated will be used for the revegetation of the area. This revegetation is part of the environmental commitments of the Punta Palmeras park, and has been carried out with the planting of 630 individuals of the *Bahia Ambrosioides* species in a site of 2.2 ha. Although the use of the water in this project is for irrigation, its quality means that it could be used as drinking water or for industrial purposes.

This wind farm is located in an area with low rainfall and no nearby water resources, so this initiative is a great solution to address the problem of water scarcity that often occurs in these types of sites. It also reduces the consumption of water from other resources needed in the area, as well as reducing the cost associated with network water consumption.

 More information: [Water Policy](#).

## STRATEGY

ACCIONA Energía's water strategy is noted for its strict compliance with the law, responsible and efficient management, the establishment of specific objectives through the Sustainability Master Plan, the development of new technologies, the integration of water into ESG risk management, the extension of its principles to the value chain and transparent communication.

ACCIONA Energía (through its parent company ACCIONA), participated in the Global Compact Leaders Summit, in parallel to the United Nations General Assembly during the *New York Climate Week*. The company joined the [Forward Faster initiative](#), making commitments in key areas such as climate change, living wages, finance and investment, and water resilience.

*Forward Faster* seeks to increase accountability and transparency on the Sustainable Development Goals (SDGs). ACCIONA Energía, through its parent company ACCIONA, is committed to improving water resilience in its operations and supply chains, with the aim of positively impacting at least 100 priority and vulnerable water basins by 2030.

## Objectives and metrics

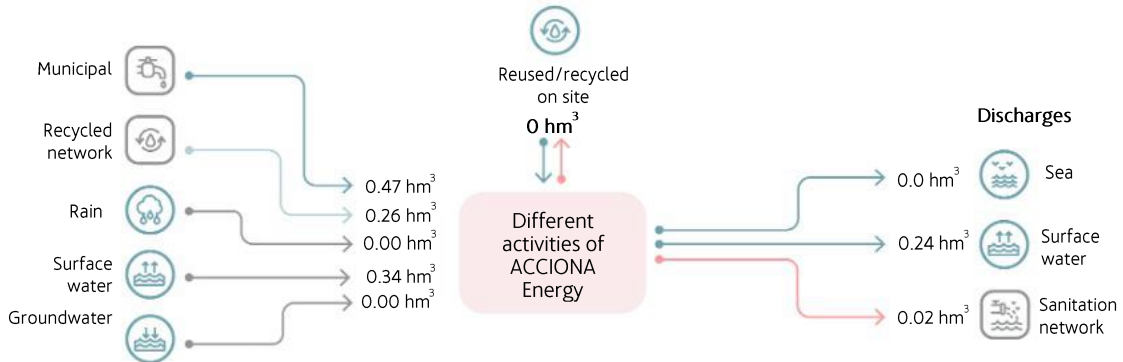
### Targets for water and sea resources (E3-3)

ACCIONA Energía's objective regarding water and marine resources, established in the 2025 Sustainability Master Plan, focuses on making the best use of the water resource and reducing its own consumption in countries in a situation of low resource availability.

The volume of water used for ACCIONA Energía's own consumption in water-stressed countries amounted to 1,869 m<sup>3</sup>. In 2023, ACCIONA Energía's target to reduce the use of surface water, groundwater and municipal water in water-stressed countries was set at 12 %. The actual cut was as much as 10 %.

## Water consumption (E3-4)

The company's interactions with water resources are detailed below:



### Water transfers

Electricity generation from hydroelectric plants requires storage of water in reservoirs. In 2023, ACCIONA Energía's hydroelectric plants provided a total of 1,743,508 MWh energy from 9,442 hm<sup>3</sup> resource. This dammed water is turbined and returned to the environment in the same conditions, without any physico-chemical alteration.



### Water consumption

Water consumption includes *freshwater* abstractions such as municipal, surface and groundwater for cooling in biomass power plants, maintenance and human consumption. The total volume of water for own consumption in ACCIONA Energía was 1,075,959 m<sup>3</sup> in 2023.

The biomass plants use water for cooling, capturing water from different sources, such as recycled water from the network in the case of the Briviesca plant or water captured and returned in equal volume to an agricultural irrigation channel in the Sangüesa plant. This water is returned to the source of origin maintaining its quality, with slight physical and chemical alterations. In 2023, ACCIONA Energía consumed 0.61 hm<sup>3</sup> of water for biomass cooling.

Furthermore, ACCIONA Energía has calculated the water consumption (surface and groundwater) associated with its suppliers, resulting in just over 3.7 hm<sup>3</sup> for its direct suppliers and 15.48 hm<sup>3</sup> for its entire supply chain.



### Reused water consumption

The water sources that do not deplete the natural reserves available, such as rainwater, recycled water from the mains and water reused or recycled on site, supplement the water used for its own facilities.

In 2023, 36 % of the water consumed by ACCIONA Energía came from rainwater, recycled water from the mains and water reused or recycled on site. 68 % of the water used in the Briviesca biomass comes from municipal wastewater treatment plants.

## E4 Biodiversity and Ecosystems

Humanity is witnessing a global decline in biodiversity at an unprecedented rate, threatening essential ecosystem services for society and the economy. Faced with this reality, ACCIONA Energía has taken a proactive stance, seeking to develop the knowledge and technology that will enable it to have a positive impact on all its activities.

### MANAGEMENT OF IMPACT, RISKS AND OPPORTUNITIES

#### Analysing nature-related dependencies and impacts, risks and opportunities (IRO-1)

In 2022, ACCIONA Energía carried out two pilot projects based on the guidelines of the Task Force on Nature-related Financial Disclosures (TNFD). This initial effort allowed it to develop and refine its own internal methodology, marking a significant step forward in its environmental commitment during 2023.

As part of its adherence to the TNFD, ACCIONA Energía has adopted the LEAP methodology, which is broken down into four essential steps: Location of environmental dependencies and impacts; Evaluation of the risks and opportunities arising; Assessment (valuation) of the economic impact of these factors; and Publication (disclosure) of all this information. This systematic process underlines the company's holistic approach to identifying and managing its interaction with nature, aligning with international best practice in sustainability.

This approach not only reflects ACCIONA Energía's commitment to preserving biodiversity, but also highlights its leadership in incorporating environmental considerations into its business strategy. This is not only to mitigate risks, but also to identify valuable opportunities to promote sustainability in its operations and in the global community.

#### PROGRESS IN THE INTEGRATION OF THE LEAP METHODOLOGY AT ACCIONA ENERGÍA

##### LOCATE (L)

In this phase, ACCIONA Energía has focused its analysis on its direct operations. This is because consideration of the geographical location of the organisation's interface with nature must be an integral part of the assessment, recognising that dependencies and impacts on nature occur in specific ecosystems.

The spatial distribution of ACCIONA Energía's active facilities in 2023 is shown below.



The *Locate* phase categorises installations as material when they interact or are located in ecologically sensitive areas. The presence of protected areas (PAs), key biodiversity areas (KBAs) or areas with a water stress of more than 40 % (WS) are the factors used to consider an area as ecologically sensitive.

The results of this categorisation reveal that approximately half of ACCIONA Energía's projects or facilities are linked to some sensitivity factor, identifying more than 60 significant projects where more than two sensitivity factors interact with the project. In terms of geographical distribution, Spain stands out as the most relevant country in terms of ecological sensitivity.

## EVALUATE (E)

In this second phase, we proceeded to identify and evaluate the dependence on ecosystem services and the elements generating significant and specific potential impacts for each production process of ACCIONA Energía's projects or facilities.

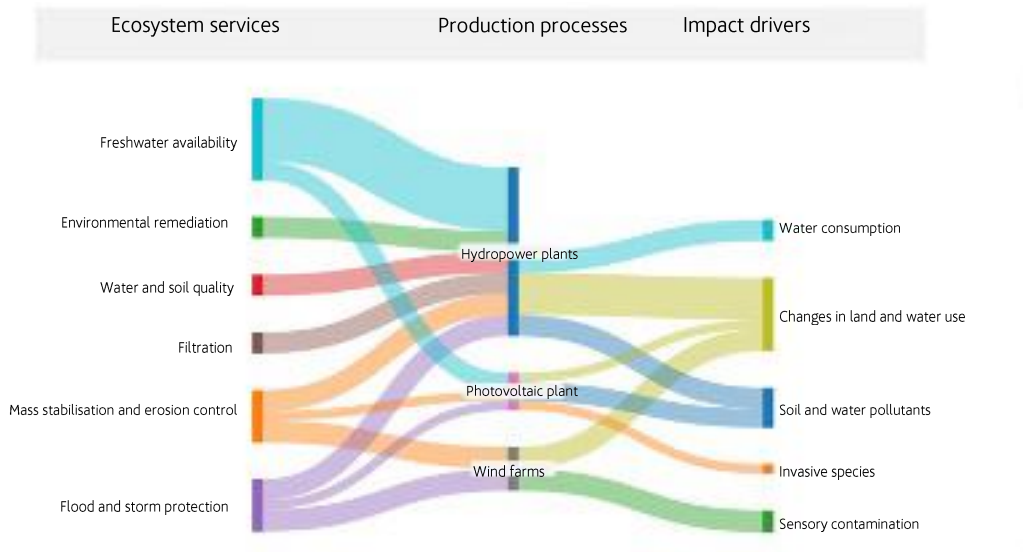
Ecosystem services are central to the relationship between nature and business. Each of these services represents a benefit that nature provides to support or improve the company's operational processes. On the other hand, impact *drivers* are potential events that can trigger multiple impacts, impact being understood as "alterations in the quantity or quality of natural capital".

Using the *Exploring Natural Capital Opportunities, Risk and Exposure* (ENCORE) tool, we analysed in detail the ecosystem services on which projects and facilities classified as material depend primarily, as well as the potential impact drivers. This allows to focus on potential sources of risks and opportunities for the company.

ACCIONA Energía's projects and facilities considered material in terms of ecological sensitivity are

related to energy production processes using solar, wind and hydroelectric technologies.

The distribution of dependencies and impacts for the different material technologies is shown below:



The results of this assessment indicate that the most representative **ecosystem services** are:

1. Water availability is linked to three ecosystem services: access to and quantity of surface water, availability of groundwater, and maintenance of a constant and healthy water flow. When this dependence is coupled with a high water stress categorisation, it can potentially pose a risk to the facility.
2. Ground stability is a key service in the development of structural projects, the greater the stability the lower the probability of risk materialisation. This service is maintained with a healthy vegetation cover, which reduces the risk of avalanches and landslides.
3. Flood and storm protection is achieved through the protective, buffering and mitigating effects of vegetation. The more vegetation cover and tree and shrub species are preserved and promoted, the more structure the soil has and the less vulnerable the project will be to flooding and storm events.

ACCIONA Energía is aware that biodiversity itself is a key natural asset and that ecosystem services bring benefits to the economy and society. Relying primarily on provisioning services and regulation and maintenance services further justifies ACCIONA Energía's vision of promoting the valuation and conservation of nature, thus helping to halt the loss of biodiversity and returning ecosystems to their optimal conditions.

In terms of **potential impact generators**, that have the capacity to generate a change in the quality of the state of nature directly and in the quantity indirectly, the most important are:



- Wind power technology:
  - o The construction and operation of the facilities may lead to modification of terrestrial ecosystems and disturbance of the environment: noise pollution during the construction phase and damage to birds and bats due to collisions with wind turbines.
- Photovoltaic solar technology
  - o Land use can fragment habitats if barriers to species movement are introduced. Soil compaction can increase erosion.
- Hydraulic technology
  - o Possible alteration of ecological flows. Sediments can lead to eutrophication and increased erosion.

In this regard, compliance with standards and criteria, often exceeding environmental impact legislation, enables ACCIONA Energía to minimise these effects. The processes and procedures established in the ISO 14001 certified environmental management system allow these types of impacts to be avoided, reduced, restored and compensated for.

 **For more information** [on ACCIONA's Biodiversity Commitment](#)

## ANALYSE (A)

In this phase, the identification and quantification of physical and transitional risks related to nature was carried out for each of the material projects according to the LEAP methodology, as well as for the set of facilities that were excluded from materiality because they interact with a single ecological sensitivity factor.

Nature-related risks were assessed using the company's ESG Risk Management System. The ESG variable "Biodiversity and Protected Areas" is configured on the basis of the level of existing biodiversity by location and the degree of protection offered by conservation designations. From this procedure we conclude the following:

- Only 9 % of the installations are located in ecological zones where both the level of existing biodiversity and the protection afforded by conservation designations could pose a physical and/or reputational risk from the impact generated by the installation.
- In terms of risk at country level, the countries with the highest probability of nature-related risk materialising in both protected areas and terrestrial biodiversity are Spain, Portugal and Croatia.
- The most important mitigation and management measures for potential dependencies, impacts, risks and opportunities are the identification at facility level of the potential impact on nature, the application of the impact mitigation hierarchy, and the implementation of environmental monitoring plans with the corresponding prevention, compensation and mitigation measures.

From the analysis of dependencies, impacts and risks related to nature, it can be affirmed that ACCIONA Energía's business strategy is resilient to the drivers of change in nature. The scope of impacts, as can be seen in the rest of the Positive Planet chapters, is moderately low, as is the case for risks, and high for opportunities.

## **Policies relating to biodiversity and ecosystems (E4-2)**

Acciona Energía's Biodiversity Policy not only promotes the conservation and responsible use of natural heritage as a necessary vehicle for economic development and social progress, but also as a key high-value asset in its own right.

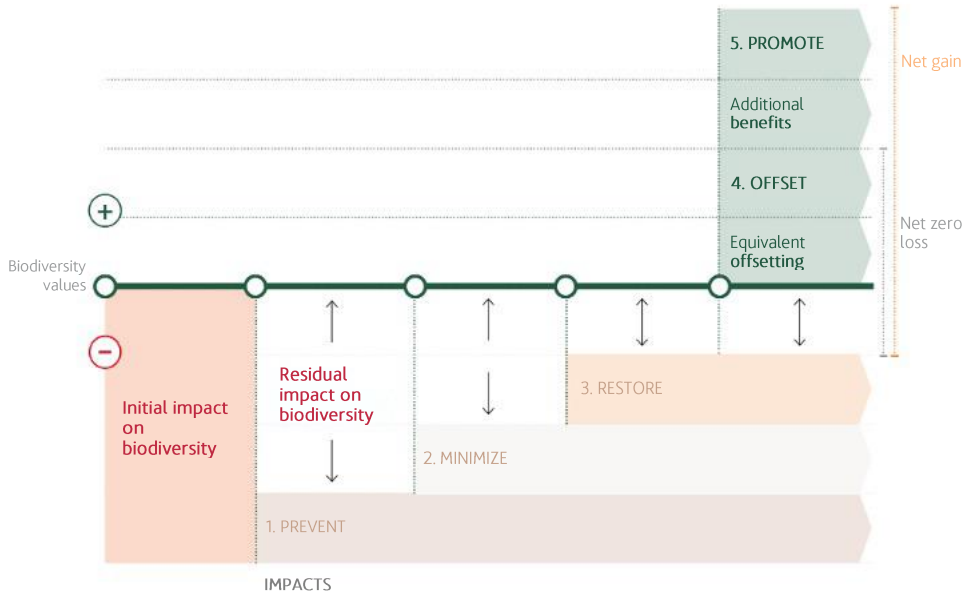
The principles laid down in the policy are part of the following topics:

1. Conserving, protecting and improving the environment through specific actions.
2. Controlling and offsetting the impacts caused by the company's business activities.
3. Disseminating and promoting knowledge and courses on biodiversity conservation, highlighting and announcing the actions developed and encouraging best practices.
4. Collaborating with public administrations, local communities, social organisations and other stakeholders in the development of biodiversity conservation, raising awareness and researching matters related to biodiversity.

## **Biodiversity and ecosystem actions and resources (E4-3)**

ACCIONA Energía projects integrate the mitigation hierarchy through specific impact identification studies, in addition to carrying out actions for the conservation, protection and restoration of habitats and ecosystems that may be affected by its facilities or in addition to them.

MITIGATION HIERARCHY SCHEME



**PREVENTION AND MINIMISATION**

Environmental Impact Assessments (EIAs) and Environmental Management Plans (EMPs) are crucial to prevent and minimise biodiversity loss, as they provide a comprehensive assessment of the potential adverse effects of human activities on the environment. These tools allow the identification of sensitive areas and species at risk, as well as the implementation of corrective and mitigation measures to avoid or reduce the negative impact on biodiversity, thus ensuring the conservation of ecosystems and their associated services.

All ACCIONA Energía’s centres that represent a possible effect on protected areas and the adjacent biodiversity have this kind of studies and plans. During 2023, ACCIONA Energía has promoted 94 Environmental Impact Assessments (EIA), of which nearly 20 have already obtained favourable Environmental Impact Statements (EIS).

The EISs or Environmental Authorisations for these projects were published in the relevant official gazettes and platforms were set up by the government to channel citizen participation and obtain possible allegations in this regard.

In addition, ACCIONA Energía has developed, implemented and followed up 182 environmental management, monitoring and surveillance plans at centres and facilities for construction and operation and maintenance.

**RESTORATION**

Solar photovoltaic plants require large areas of land, which have various effects: changes in previous uses, mainly agricultural and livestock farming, possible fragmentation of natural habitats, visual impact on the landscape due to the presence of anthropic elements in the environment. In order to reduce these effects, a number of preventive and corrective measures are put in place.

One of the usual corrective measures is the creation of plant barriers around the perimeter fence that delimits the plant. At the Bolarque solar photovoltaic plant in Cuenca, which construction was completed in 2023, native tree and shrub species (kermes oaks, holm oaks, aladerns, rose bushes, etc.) were planted over a width of about 5 metres and along about 9.75 km of the perimeter fence. This action will act both to screen the installation,

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integrating it into the surroundings and minimising its visual impact, and to prevent the risk of birds colliding with the fencing. A total of 5,780 plants have been used and will be continuously monitored throughout the life of the installation to confirm their deployment and growth. Another of the measures implemented has been aimed at avoiding fragmentation of the territory and habitats. To this end, several corridors have been designed to leave spaces free of modules, with a total surface area of some 4.6 hectares, in which 2,880 plants of indigenous species have been planted, similar to those used in the plant barrier, which will allow and encourage the transit of terrestrial fauna through the solar plant and its surrounding environment. It should be noted that the perimeter fencing is designed to leave about 20 cm from the ground, which allows the transit of small fauna between the plant and its surroundings.

## ZERO NET LOSS - MACINTYRE AND THE MACROZAMIA CONFERTA TRANSLOCATION

Mass deforestation, climate change, pollution, the introduction of invasive species and overexploitation of resources are some of the main drivers of the decline in plant diversity worldwide. This loss has profound impacts on ecosystems, compromising their stability and ability to provide essential services for life on the planet.

Aware that biodiversity itself is a key and highly important natural asset, ACCIONA Energía promotes its appreciation and conservation as a necessary means for economic development and social progress.

The MacIntyre wind complex will be the largest renewable energy facility built by ACCIONA Energía to date, with a total capacity of 923.4 MW and 162 wind turbines. This project has initiated, in collaboration with the University of Queensland, a conservation and research plan for *Macrozamia Conferta*.

This species plays a vital role in its natural habitat as an integral part of Australia's forest and bushland ecosystems, providing food and shelter for a variety of animal species and contributing to local biodiversity. However, like many cycad species, it faces threats such as habitat destruction and illegal collection, highlighting the importance of its conservation and protection.

The plan consists of locating, describing, translocating and maintaining more than twelve thousand specimens of these shrubs. This has meant an early understanding and realisation of the need to care for the genetics of the species alongside the repercussions of climate change and pollution to which they are subjected.

## NET GAIN - ENDANGERED SPECIES POPULATION REINFORCEMENT PLAN

ACCIONA Energía's commitment to the protection of biodiversity is manifested, among other actions, in its participation in plans to support populations of endangered species. The red kite (*Milvus milvus*) is a bird of prey that inhabits open wooded areas. In Spain it is included in the National Catalogue of Threatened Species, as a species in danger of extinction. Like other raptors, the most important threats to their conservation are electrocution, roadkill, illegal hunting, habitat alteration, reduced food availability and poisoning by chemicals.

In order to boost and protect the population in regions that are in the worst situation, which in Andalusia has been reduced by 95 % in recent years, ACCIONA Energía is participating in a Plan to strengthen the Red Kite population in the Cazorra, Segura and Las Villas Natural Park.

The aim of the project is the creation and establishment of new pairs of red kites in the Andalusian region, helping to promote new populations and reinforcing the scarce existing population in the national park, where it is suffering a serious decline in its population values. Using the *hacking cage* method, chicks of this species are introduced, fed and marked (ring or GPS transmitters) until they reach an optimum age for release. After their release, they will return to the area to breed naturally, establishing new populations.

## ACCIONA Energía

ACCIONA Energía is participating in the project by financing the marking with GPS transmitters in order to know their movements and distribution, with the supplementary feeding of the released specimens and their tracking and monitoring.

## OBJECTIVES AND METRICS

### Biodiversity and ecosystem objectives (E4-4)

The Sustainability Master Plan (SMP) underlines ACCIONA Energía's commitment to the protection and restoration of biodiversity and the target of achieving a positive impact on all of the company's projects through the application of the mitigation hierarchy and nature-based solutions.

ACCIONA Energía is committed to reaching the No Net Loss objective (medium term) and the Net Gain or Net Positive Impact goal (medium-long term) in biodiversity and ecosystemic services.

In addition, ACCIONA Energía has set a No Gross Deforestation target. The company understands the importance of reducing global deforestation, which includes any deforestation associated with the basic products and services generated, marketed and/or sold by the company.

This commitment translates into the planting of half a million trees (besides those already planned to offset some of the projects) over the 5-year SMP period. With this ACCIONA Energía aims to achieve the No Net Deforestation target and offset the loss of biodiversity with voluntary plantations.

### Impact metrics related to biodiversity and ecosystems (E4-5)

#### Ecosystem condition

Protected areas are those terrestrial or marine areas which, due to their natural values, are specifically dedicated to nature conservation and subject to a legal protection regime. They are one of the key instruments for *in situ* conservation of biodiversity.

ACCIONA Energía draws up information on the protection figures, both national and international, that interact with projects and facilities in order to promote conservation and prevent possible negative impacts on these areas.

The distribution of ACCIONA Energía projects by type of protection instrument is shown below:

	PROJECTS IN PA	PROJECTS AT KBA	PROJECTS IN BOTH	OCCUPIED SURFACE AREA (HA)
ACCIONA Energía	55	57	25	742

During 2023, significant work has been undertaken to comprehensively reassess and map the area occupied by hydro and wind sites.

## Species status

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 species and the degree of protection according to the IUCN Red List. Furthermore, it takes into account the species that are not on this list but are protected by national listings.

PROTECTION CATEGORY	ABBREVIATION	NO OF SPECIES <sup>1</sup>
Extinct	EX	0
Extinct in the wild	EW	0
Critically endangered	CR	1
Endangered	EN	1
Vulnerable	VU	4
Almost threatened	NT	1
Least concern	LC	30
Data deficient	DD	0
Not evaluated	NE	0
Other national listings	-	31
<b>TOTAL</b>		<b>68</b>

(1) No. of species affected in protected areas or areas of high biodiversity value.

## Impact management

ACCIONA Energía identifies, assesses and manages the drivers of change in nature in its projects. These drivers are potential impact drivers related to climate change, land and water use change, resource circularity, pollution and invasive species.

The habitat regeneration actions, as well as other works of landscape integration or reforestation of degraded or devoid of vegetation areas that were carried out in 2023 as preventive corrective or compensatory measures resulted in a total of 8,660 units of tree and shrub species, representing some 9.1 hectares restored.

Additionally and complying with the commitment in the Sustainability Master Plan on planting and monitoring the growth of half a million trees over the five-year SMP period. The breakdown by year of the planting target is given below:

	2021	2022	2023	2024 <sup>1</sup>	2025 <sup>1</sup>
Trees planted on a voluntary basis	74,947	123,134	118,738	117,500	117,500

(1) Target figure

This action will boost the management and mitigation of deforestation risks among partners, suppliers and other stakeholders.

Other actions that promote the prevention, mitigation, reduction and compensation of potential and materialised impacts of ACCIONA Energía's activities are training and continued investment.

ACCIONA Energía's staff is highly qualified in each of the functional, hierarchical and geographical areas and always contributes the maximum quality and experience required to carry out the company's activities adhering to the strictest environmental standards. The company continues to further its commitment to environmental training and the development of skills in that area. In 2023, ACCIONA Energía's employees received a total of 2,307 hours of training in areas such as climate change, environmental management systems, waste management and environmental restoration of degraded areas, among other subjects.

In 2023, ACCIONA Energía allocated €13.15 million to managing (preventing, reducing or correcting) the environmental impacts caused by the company's activity, of which €12.69 million on expenditures and €0.46 million on investments. Environmental insurance is consolidated at group level.



## E5 Resources and circular economy

Electricity generation from renewable sources and the circular economy are connected by their shared focus on sustainability, resource efficiency and reduction of environmental impacts. The transition to a circular economy can further strengthen the sustainability of renewable electricity generation and vice versa.

By 2050, it is estimated that humanity will consume resources as if it had three planets, with a 70 % increase in waste generation. This growing consumption has serious consequences, as more than 50 % of greenhouse gas emissions and more than 90 % of biodiversity loss and water consumption come from resource extraction and processing.

The transition to a circular economy for ACCIONA Energía will not only reduce considerably the use of natural resources and the environmental impact, it will also entail a financial opportunity arising from the competitive edge and, if the right processes are put in place, it will enable a better restoration and regeneration of the natural capital.

ACCIONA Energía, a pioneer in the circular economy, promotes eco-design, restoration and positive impact in its projects. The company promotes and invests in innovation at various stages of its operations, going beyond regulatory obligations to reinforce its commitment to the well-being of people and the environment.

### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

#### Impacts, risks and opportunities related to resources and the circular economy in ACCIONA Energía. (IRO-1)

ACCIONA Energía integrates and explores circular solutions in its operations. These solutions address the procurement of recycled or reused materials, prevention to minimise waste generation, innovation for the reuse of their waste as raw materials for other industries and the development of programmes for the extension of the useful life of their assets through the use of predictive models that optimise operation and maintenance.

The transition to a circular economy and the minimisation and mitigation of environmental impacts caused by resource consumption and waste generation require an in-depth analysis of what happens both in the company's own operations and in the supply chain.

#### Potential impacts

The volume of resources purchased by ACCIONA Energía is mainly distributed among steel (31 %), concrete (29 %) and glass (22 %). Of the total resources, 22 % were of recycled origin in 2023. In terms of waste, around 85 % of the waste generated is slag, and 97 % of the waste is destined for recovery.

ACCIONA Energía has analysed the potential sources of impact on biotic and abiotic factors arising from these resources and wastes.

#### Natural resource consumption

The production of materials such as concrete, steel and glass involves intensive consumption of resources such as water and energy, putting pressure on nature and potentially intensifying the overexploitation and depletion of these resources.

Eco-design and the use of recycled materials reduces the amount of energy and materials needed in the construction and operation of the facilities, thus reducing the consumption of natural resources.

In addition, the proper management of the waste generated reduces the volume of waste destined for landfill, promoting the recovery of materials and representing an opportunity for the business in economic terms and in terms of lower impact.

### Climate change contribution

The manufacture of concrete can generate significant greenhouse gas emissions, contributing to climate change.

The use of sustainable and renewable alternatives reduces GHG emissions in the company's supply chain and extends the life cycle of resources.

To mitigate these environmental impacts, it is essential to adopt sustainable consumption practices that include efficient resource management, selection of low environmental impact materials, reuse and recycling of materials, and sustainable planning to minimise the ecological footprint.

In addition, ACCIONA Energía has a supplier approval system that provides security and traceability of the origin of the resources acquired, helping to prevent impacts caused in the supply chain.

### Risks related to the circular economy

ACCIONA Energía's commitment to introduce eco-design strategies, reduce the amount of non-recycled waste and double the percentage of renewable and/or recycled resources that the company consumes mark the roadmap for analysing risks in terms of the circular economy. ACCIONA Energía's ESG Risk Management System therefore integrates the recycling index, which assesses a country's willingness and ability to manage solid waste in a way that promotes circular material flows.

The analysis consists of transforming the inherent condition of the countries where the company operates into the actual situation and management of the projects through a specific consultation. This increases the capacity to measure and anticipate impacts, improvements and potential risks in the circular economy.

The results of this analysis indicate that:

- The countries that represent the greatest risk are Egypt and Peru, although with a negligible economic consequence and a remote probability, indicating that the management of resources and waste established in ACCIONA Energía's projects is effective and sets the company on the path to achieving its circularity objectives.
- The majority of mitigation measures refer to the implementation of an environmental management system certified in ISO 14001 and 100 % aligned with the applicable regulatory requirements, which include specific procedures for waste management in terms of reduction and recovery. In addition, the company performs life cycle analysis on 100 % of its new projects to identify opportunities for the use of recycled or reused materials. In 2023, the company ran 9 LCAs.
- The Supply Chain Management carries out initiatives with suppliers to identify circular options for certain products to reduce the consumption of resources and the carbon footprint of their supply chain.

## Circular economy POLICY (E5-1)

ACCIONA Energía has a Circular Economy Policy that complements its Environmental Policy. The policy establishes a framework for action focused on regenerating environments and creating positive renewable energy balances, eliminating the use of virgin materials and promoting complete circularity in the materials used in its processes. The Audit and Sustainability Committee, which updated and approved this policy in 2022, is responsible for its oversight. The policy commitment is applicable to all areas of ACCIONA Energía.

In terms of guiding principles, the policy emphasises the importance of the waste hierarchy, with a special focus on maintenance. This includes reviewing operations to prevent failure and material fatigue, thereby prolonging the useful life of assets. In addition, the reuse of end-of-life materials is valued, applying a hierarchy of management and segregation to preserve the maximum value of the components.

The principles outlined by the Circular Economy Policy are:

- Use technology to optimise and adopt a view of the life cycle that will allow us to innovate with materials during the design phase.
- Use renewable energy, increase operational performance, optimise maintenance operations to extend the life of assets, value materials and develop a functional provisioning approach. All this, imitating as much as possible nature's behaviour to optimise operational circularity.
- Boost new business and investment models, promote, share and co-create, seeking new uses for complex materials that will foster the performance of local ecosystems.
- Support the development of regulations in favour of circular economy, setting objectives and being accountable, and also encourage the development of an environmental statement for the product to help promote circular economy.

 **More information:** [ACCIONA Energía's Circular Economy Policy](#)

## Actions carried out on resources and circular economy (E5-2)

### Wind turbine blade recycling

ACCIONA Energía and RenerCycle have announced the construction of Waste2Fiber, a wind blade recycling plant in Lumbier (Navarre), which will be operational in 2025. This project integrates ACCIONA's experience in composite materials, ACCIONA Energía's access to disused wind turbine blades and RenerCycle's activities in wind turbine dismantling. It will also provide employment for more than 100 people.

The Waste2Fiber plant will receive €5.3 million in funding from the Spanish Government's Programme of Strategic Projects for Economic Recovery and Transformation (PERTE), in addition to support from the Government of Navarre. It will use a proprietary heat treatment technology to recycle composite materials present in wind turbine blades, preserving the properties of the reinforcing fibres and transforming them into high-value secondary raw materials.

Construction of the plant will begin in the first half of 2024, with a processing capacity of 6,000 tonnes of material per year. This project, in line with European waste management directives, will significantly reduce the carbon footprint and promote the circular economy in the wind industry, reaffirming ACCIONA's commitment to

sustainability and innovation.

## Use of slag on motorways

Slag, a by-product of biomass burning for renewable electricity generation, can be reused in multiple applications as a by-product in other industries.

This is in line with ACCIONA Energía's commitment to giving waste a second life, promoting the circular economy and reducing CO2 emissions during the construction process, consolidating its position as a leader in promoting the circular economy in the sector. ACCIONA Energía's biomass plants have been awarded the "Zero Waste Management" certificate, demonstrating its commitment to responsible waste management.

ACCIONA and ACCIONA Energía have completed an innovative pilot project, integrating biomass slag from its Sangüesa plant into the reconstruction of a 365-metre-long, 5-metre-wide farm road as part of the Logroño bypass (A-68), replacing the "selected" soil layer with one of equal thickness composed of this sustainable material. This pioneering application, led by ACCIONA's Construction R&D Centre with the support of ACCIONA Energía's Innovation department, not only demonstrated the feasibility of replacing the natural soil, maintaining the 25 cm of artificial gravel and replacing 25 cm of selected soil with biomass slag, but also ensured compliance with Spain's demanding road construction standards.

Slag, generated during the production of renewable electricity at the Sangüesa biomass plant, has proven to be an effective alternative, providing high bearing capacity and stiffness to the road. The successful reuse of 1,500 tonnes of biomass slag highlights its ability to integrate sustainable practices into its operations. This initiative follows previous projects that demonstrated the feasibility of reusing biomass slag in construction works, highlighting its good mechanical and environmental performance.

ACCIONA Energía also optimises the circularity of its processes in such a way that:

- It uses life cycle analysis tools for 100 % of its new projects completed annually, allowing it to assess and reduce the impact of its developments, and also the consumption of material and energy resources. In 2023, ACCIONA Energía carried out 9 Life Cycle Assessments (LCAs).
- Extends asset life by using predictive modelling to optimise operation and maintenance, as well as repowering its older wind farms.
- It minimises its fossil fuel energy use.
- It rationalises its water use and makes use of alternative water sources that do not deplete the existing resources.
- It provides a second life to the waste and by-products derived from its processes: ashes, slag and sludge.
- It maximises the utility of materials and uses sustainable resources, which reduce to a minimum the amount of components used.
- It carries out intensive R+D+i work in all areas of its activity, improving the efficiency of its processes and the performance of the resources used.
- It works closely with its stakeholders in training and awareness-raising on the circular economy.
- It integrates the risks related to the circular economy into the company's ESG Risk Management System.

## OBJECTIVES AND METRICS

### Objectives for the circular economy and the use of resources (E5-3)

Within the framework of the 2025 Sustainability Master Plan, ACCIONA Energía has resolved to increase its efforts in the area of the circular economy, and to halve the amount of non-recovered waste compared to 2020, and also double the percentage of renewable/recycled resources used by the company.

In 2023, this commitment has translated into the following objectives:

1. A 30 % reduction in the hazardous and non-hazardous, non-recovered waste generated compared to 2020.
2. Use of at least 17.6 % resources from recycled/renewable sources.

The **optimisation of circularity** in the company's processes occurs in such a way that:

- It uses life cycle analysis (LCA) tools, to assess and reduce the impact of its developments, and also its consumption of materials and energy.
- It minimises its fossil fuel energy use, using renewable alternatives.
- It rationalises its water use and makes use of alternative water sources that do not deplete the existing resources.
- It provides a second life to the waste and by-products derived from its processes: mainly ashes, slag and sludge.
- It maximises the usefulness of materials and uses resources that incorporate a % of recycled material, such as steels and concretes.
- It carries out intensive R&D&i work in all its business areas, improving the efficiency of its processes and the performance of the resources used.
- It uses digitisation to extend the useful life of assets, using 3D models and artificial intelligence.
- It works closely with its stakeholders in raising awareness and giving courses about the circular economy.

## Resource consumption and waste generation (E5-4 / E5-5)

### Consumption of resources (E5-4)

#### AR 21 DISCLOSURE OF INFORMATION ON MATERIAL RESOURCE INPUT

	2020	2021	2022	2023
<b>Total resources (tonnes)</b>	<b>248,388</b>	<b>225,303</b>	<b>26,018</b>	<b>176,574</b>
Recycled or renewable resources (tonnes)	21,840	19,284	3,463	39,530
Recycled or renewable resources (%)	8.8 %	8.6 %	13.3 %	22.4 %

Recycled or renewable: certified wood (FSC or similar), steel, concrete, copper, recycled paper and cardboard

Total resource consumption in 2023 was 176,574 tonnes, which represents an increase compared to the previous year, mainly due to an increase in construction activity with own resources compared to 2022. The percentage of materials from recycled or renewable sources has increased, being 22.4 %, 9.1 points more than in 2022.

ACCIONA Energía calculates the consumption of resources on the basis of the purchases made for each of the projects, using the accrual method. Procurement reflects the volume of raw materials or products purchased.

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, 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.

### Waste generation and management (E5-5)

	2020	2021	2022	2023
<b>Total non-hazardous waste (tonnes)</b>	<b>34,546</b>	<b>36,004</b>	<b>34,202</b>	<b>33,810</b>
Non-hazardous waste to landfill (tonnes)	2,335	1,188	402	531
% Non-hazardous waste to landfill	7 %	3 %	1 %	2 %
Non-hazardous waste recovered (tonnes)	32,211	34,816	33,800	33,279
% of recovery of non-hazardous waste	93 %	97 %	99 %	98 %
<b>Total hazardous waste (tonnes)</b>	<b>749</b>	<b>634</b>	<b>815</b>	<b>851</b>
Hazardous waste to landfill (tonnes)	164	86	234	391
% Hazardous waste to landfill	86 %	40 %	74 %	46 %
Hazardous waste recovered (tonnes)	585	584	581	459
% of recovery of hazardous waste	14 %	60 %	26 %	54 %

2023 saw a slight reduction in the company's waste generation. The amount of hazardous waste generated has gone up compared to 2022 but remains low. 33,810 tonnes of non-hazardous waste were generated during the

year, of which 531 were sent to landfill (129 tonnes more than the previous year, mainly owing to planned shutdowns for maintenance in biomass) and 33,279 tonnes were recovered (reuse, recycling or other channels). The latter figure constitutes 98 % of the total non-hazardous waste generation.

The reuse of 29,168 tonnes of slags and 2,597 tonnes of ashes must be highlighted, representing 100 % legally recoverable slags and ashes generated in ACCIONA Energía biomass plants.

04

SOCIAL



# S1 Own staff

## ACCIONA ENERGÍA PUTS PEOPLE AT THE HEART OF ITS BUSINESS PROPOSAL

As a company, ACCIONA Energía aspires to create a positive impact in everything it does, developing decarbonisation solutions that will make a sustainable future possible. It does this through relevant projects that stimulate innovation and creativity, enabling people to grow and develop. Leading the transformation and leaving a relevant mark on society as a company is only possible with the talent, leadership and commitment of its people.

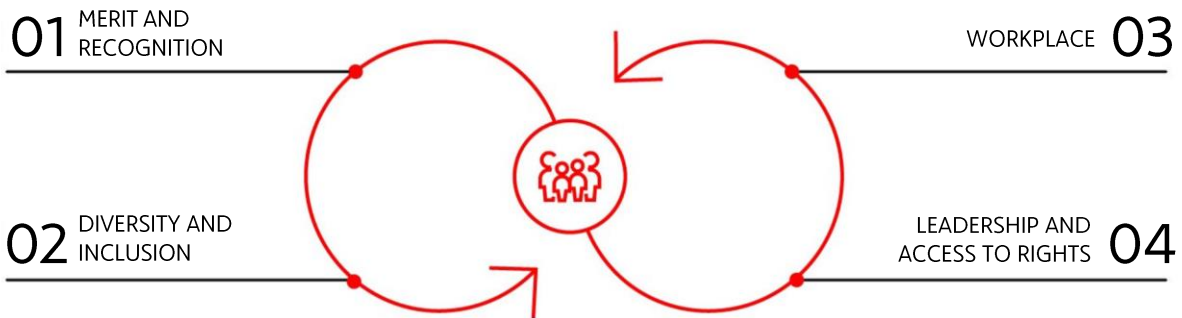
The company recognises that a strong value proposition, backed by a people-centric strategy, can make a difference in attracting, retaining and engaging talent. Individualised development plans that match each person's goals and aspirations, continuous training opportunities, mentoring, work-life balance, wellness programmes, recognition systems that celebrate people's achievements and contributions, and competitive benefits are all part of the company's value proposition for its people.

Therefore, PEOPLE is the global strategy devised to place people at the centre and invest in them through its fundamental pillars -recognition of merit, diversity and inclusion, transformative workplace, leadership and access to rights- with clearly defined goals and placed at the same level as the financial and environmental ones.

The PEOPLE strategy links the company's purpose to people, has a strong commitment to equality and a culture of inclusion and diversity that contributes to the creation of cross-functional teams to address challenges and propose innovative solutions, while connecting with the communities in which it operates and empowering people to contribute by actively participating and positively impacting society.



Investing in people to attract and engage the best talent  
THE BEST VALUE PROPOSITION FOR PEOPLE



## Dialogue and collaboration as a lever for growth (s1-2)

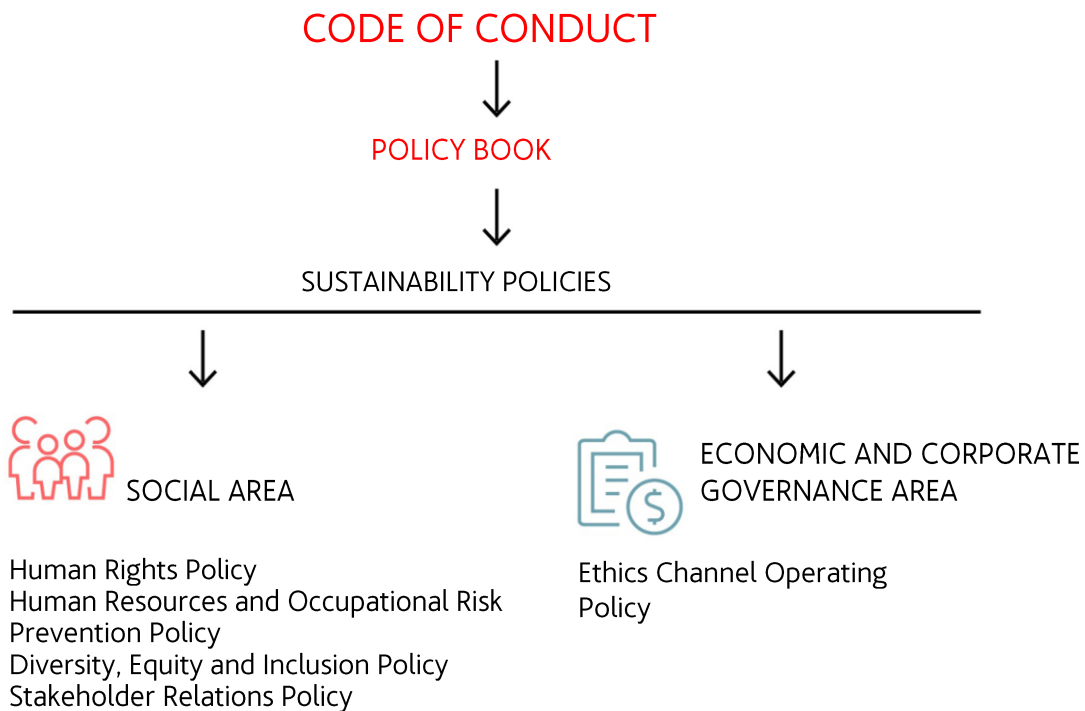
ACCIONA Energía has strengthened direct communication channels with employees through their representatives, consolidating fortnightly meetings with the most representative trade unions in Spain. In addition, meetings have been held with trade unions in Mexico, South Africa and Australia, thus ratifying the commitment to the global framework for the defence of human and social rights signed in 2017 and ratified at the Washington meeting. The agreement is available on ACCIONA Energía's website and intranet, and is shared with local unions in all countries where the company operates.

On the other hand, the dissemination and knowledge of the Ethics Channel has been promoted so that all workers can report any non-compliance or complaint regarding working conditions.

In 2023, ACCIONA Energía developed a new system for promoting, verifying and monitoring compliance with its commitments to workers in all countries. Verification systems, including visits and direct interviews by independent auditors, have been put in place for the highest risk projects in Peru and India. The results of the audits have been satisfactory, in accordance with best practices and applicable local regulations

## Worker-related policies (s1-1)

The Social Sphere policies, approved by the Audit and Sustainability Committee, as a delegated body of the Board of Directors, reflect the commitments and principles of conduct related to the company's own personnel, as well as in relation to the company's value chain.



## STAFF PROFILE

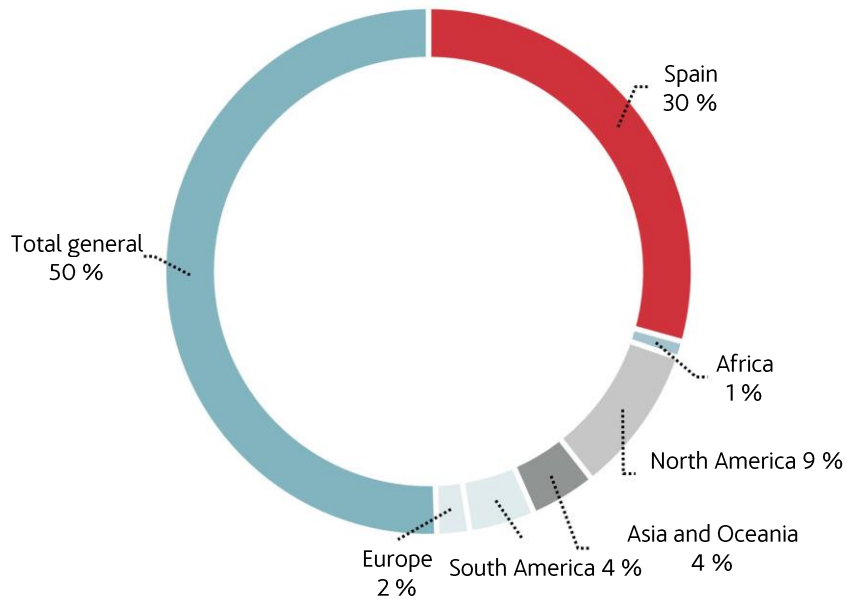
ACCIONA Energía has a global workforce made up of people of diverse nationalities and cultures who bring a wide range of experiences, perspectives and skills.

ACCIONA Energía closed 2023 with staff averaging 3,099 employees, of which 25.2 % are women. All in all, a total of 53 nationalities with presence in 22 countries across 5 continents.

### DISTRIBUTION OF STAFF BY COUNTRY (FTE)

COUNTRIES	MEN	WOMEN	TOTAL
Spain	1,426	429	1,855
Mexico	209	75	284
USA S.	207	40	247
Australia	149	82	231
Chile	108	50	158
France	30	25	55
South Africa	37	19	56
India	38	4	42
Brazil	10	9	19
Portugal	21	11	32
Peru	11	6	17
Italy	16	6	22
Poland	13	8	21
Ukraine	5	4	9
Canada	8	1	9
Dominican Rep.	5	3	8
Costa Rica	3	2	5
Colombia	2	1	3
Egypt	4	2	6
Hungary	1	1	2
Croatia	10	6	16
Singapore	2	0	2
<b>General total</b>	<b>2,315</b>	<b>784</b>	<b>3,099</b>

BREAKDOWN OF THE TOTAL WORKFORCE BY GEOGRAPHY (%)



EVOLUTION OF MANAGEMENT INDICATORS

INDICATORS	2021	2022	2023
Revenue (million euros)	2,449	4,351	3,523
Workforce cost/revenue (%)	6 %	5 %	7 %
Revenue/workforce (euros)	1,403,748	1,848,278	1,136,818
EBITDA (million euros)	1,086	1,653	1,285
EBITDA/workforce cost (%)	14 %	13 %	5 %
EBITDA/workforce (euros)	616,345	702,183	414,650
Workforce cost (million euros)	150	210	256

\* Rounded off

## SECURE EMPLOYMENT

### Recruitment selection and distribution (S1-6)

ACCIONA Energía's Talent function establishes the processes for managing requests for new positions, planning vacancies, the selection and subsequent follow-up process, in order to ensure that it runs smoothly and that due diligence is followed in the process for recruiting and selecting professionals. The local recruitment teams adapt the selection procedures to the needs arising from the particularities of each business, without prejudice to the legislation in force in each country.

The company has established internal control mechanisms to avoid unnecessary prolongation of temporary contracts through alarms on contract renewal. It is noteworthy that in Spain, all work and service contracts have been transformed into open-ended contracts without resulting in non-compliance. In addition, the company uses the now standard practice of indefinite contracts across the board.

### Transformative environments

PEOPLE is the global strategy designed to put people at the centre. It is based on four pillars aimed at driving sustainable business growth. In the case of the Transformational Environments pillar, the objectives are to improve both the employee context and brand image, as well as the society in which the company operates.

Improving the employee experience and brand image is managed by the Talent function, whose mission is to attract the best skills at the right time, creating innovative and competitive strategies to position ACCIONA Energía as a benchmark employer by offering a differential experience to its candidates. The function is based on six key pillars:

- **Brand as employer.** ACCIONA Energía's reputation as employer is framed in the commitment to sustainable employability, the early identification of talent, investment in the development of our employees and creating opportunities on an international level.
  - ACCIONA Energía has renewed the Top Employer certification which acknowledges the company as one of the best companies to work for in Spain, United States, Brazil, Mexico, Australia, South Africa and Chile, as well as obtaining the continental seal in North America. In addition, in 2023 the company has achieved this certification for the first time in Peru.
  - During 2023, ACCIONA Energía participated in the global corporate project to share inspiring stories of the company's employees. This initiative is developed in line with the Employer Brand strategy to evolve its positioning in the market, transmit ACCIONA's values and attract those profiles that are more difficult to recruit. Throughout 2023, stories were shared from professionals located in Spain, Chile, and the United States.
- **Digitisation and optimisation of the internal vacancy application process.** ACCIONA Energía values people and connects with internal talent. For this reason, it continuously reassesses its processes with the employee's experience at the centre.

With the new digital model, ACCIONA Energía eliminates manual processes and speeds up the management of internal vacancy applications, offering a quicker and simpler response to staffing needs. This is in line with the corporate *paperless* strategy, which aims to reduce dependence on paper documents and physical files.

Employees can access the vacancy application system at any time and from anywhere, facilitating the

process and allowing a clear view of the status of applications, improving transparency and communication between departments and employees.

In addition, with this new digital system, the quantitative analysis of applications has been improved, helping management to make informed decisions on staffing needs, areas for improvement and internal job mobility trends.

- **Channels for Attracting Talent** ACCIONA Energía designs innovative strategies that ensure the visibility of its global and local offers, responding to the extensive portfolio of profiles and its commitment to diversity being, at the same time, connected to the market to keep abreast of trends and best practices.

This approach allows for broadening the reach of offers, attracting specialised target groups, accelerating and optimising recruitment, and strengthening the employer brand in local markets.

In addition, the publication of vacancies on different platforms has helped to promote diversity, reaching diverse audiences such as young talent through partnerships and agreements with local universities.

**Employee Referral Programme.** In order to enhance employee engagement and foster internal collaboration, the Employee Referral Programme invites employees to refer highly qualified external candidates for Energía's vacancies globally.

This programme recognises and rewards employees who play an active role in strengthening teams by offering them the opportunity to receive a financial bonus for their referrals, and is a valuable aid to recruitment teams.

By facilitating access to high quality talent through employees' own professional networks, the efficiency of recruitment operations is strengthened, contributing to the sustainable growth of the company. In addition, the programme elevates the employer brand, positioning ACCIONA Energía as an employer of choice that values and recognises the active participation of its internal talent in building a strong and diverse team.

- **Selection methodology.** ACCIONA Energía uses the same methodology globally, designing innovative selection strategies and processes, ensuring consistency and high quality standards in all of its processes. ACCIONA Energía strives to maintain selection processes where diversity and inclusion are not only fundamental principles, but are translated into tangible actions. The selection and recruitment processes are designed to integrate candidates of all abilities, thus contributing to building a diverse and representative team. This commitment reflects the aim of creating a working environment in which every individual, regardless of their abilities, can thrive and contribute to ACCIONA Energía's collective success. The company not only maintains a commitment to the inclusion and integration of people with different abilities, but also develops a model for creating a global pool of talent, attracting young talent from the beginning of their professional career, to create an environment of opportunities that promote internal development in ACCIONA Energía.
- **Candidate's experience.** The company values people, connects with talent and appreciates diversity and therefore continually re-evaluates its processes, putting the candidate experience at the centre.

Various programmes have been carried out to put this model into practice, complemented by the *employer branding* strategy for young talent, which seeks to position the ACCIONA Energía brand as a benchmark in the employability of young talent. In this sense, the company has attended different employment forums, talks and events to approach this group and make them aware of the career opportunities it offers:

- **Academy Programme:** the aim of this corporate programme is to promote employability and

encourage young talent in order to position ACCIONA's employer brand in this group. Young students have the opportunity to train and develop different *soft skills*. In addition, through the *learning-by-doing* methodology, they learn about ACCIONA's businesses and interact with company leaders by solving practical challenges related to sustainability. In 2023, new editions were rolled out in countries where ACCIONA Energía is present: Spain, Mexico, Chile and Peru.

- **Trainees' programme:** the aim of this is to put into practice the knowledge acquired at university and get the chance to start their professional career in the company. In 2023, ACCIONA Energía recruited 131 interns globally in 9 countries (Australia, Brazil, Chile, Spain, United States, Italy, Mexico, Portugal and South Africa). Of these, 42 % were women and 58 % men.
- **Global Graduates Programme:** Having young talent prepared in terms of knowledge and skills is fundamental for the successful achievement of the global projects/challenges in which the company is involved and allows the development of talent *pools* capable of facing future challenges. To this end, each year a group of recent graduates (with up to two years of work experience) participates in the Global Graduate Programme. This programme is designed in collaboration with the Universidad Pontificia de Comillas, an international reference centre, and is delivered with a global perspective and entirely in English. The content of this programme is structured in three pillars:
  - A solid theoretical basis: specialised master classes in four areas (*i. Sustainability ii. Project Management iii. Strategy and Finance iv. Innovation and change management*).
  - Innovation and change management, practical training in key skills: critical competencies in the graduate role at ACCIONA focus on teamwork, effective communication, critical thinking, agile methodologies and creativity.
  - The applicability of the contents learned in the real world of work: through sessions with senior professionals from the company on each of the areas they work in and through group work on a practical case throughout the programme.
- **Onboarding & Buddy Programme:** at ACCIONA Energía, commitment is not only present in the initial phases of recruitment, but also in the subsequent phase of hiring and, more importantly, of integration with the organisation's culture and values.

For this reason, the Talent function has implemented a new global welcome process consisting of:

- **Global on boarding session.** The Talent Department proposes the creation of a third onboarding process that serves as an intermediary between the corporate process and local *onboarding*. With two one-hour sessions per month for new hires, new employees are provided with a more cohesive welcome and integration experience, aligned with the company's culture, history, identity and goals, enhancing their fit and contribution from the start of their career.
- **Buddy Programme.** ACCIONA Energía not only aims to offer its new employees an inclusive welcome experience, but also strives to ensure its long-term sustainability. This is why the *buddies* programme has been implemented.

Through this initiative, a smoother transition for new recruits is facilitated by assigning them an experienced colleague who provides orientation, shares internal knowledge and facilitates their integration into the corporate culture. *Buddies* play the role of informal mentors, fostering interpersonal connections, accelerating adaptation to the work environment and contributing to a collaborative and nurturing work environment.

This programme not only strengthens talent retention, but also boosts productivity by enabling new employees to quickly reach their full potential and become fully engaged in the company's goals.

## Targets to promote quality employment and performance metrics

ACCIONA Energía has developed an internal programme in Spain and in other countries where the labour market is particularly limited to ensure the linkage with workers, especially those with basic qualifications and who usually have a high turnover through the configuration of new permanent contracts and part-time contracts, which allows for the availability of qualified and specially linked employment pools. This has led to a reduction of temporary contracts in Spain with a ratio of less than 9 % of total hiring and mainly focused on replacement coverage of reserve positions.

### EVOLUTION OF DISTRIBUTION OF THE WORKFORCE BY CONTRACT TYPE AND GENDER (NO. OF EMPLOYEES)

2022						2023					
TEMPORARY			PERMANENT			TEMPORARY			PERMANENT		
MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
63	25	88	1,639	627	2,266	74	27	101	2,241	757	2,998

## Internal mobility

ACCIONA Energía intends internal mobility to be one of the main methods for development and motivation of its professionals, through an open management of the professional opportunities that the company offers transversally in the divisions, business and countries in which it operates. Internal mobility is understood to be the system used by employees to access newly created or vacant positions within ACCIONA Energía's divisions, businesses and companies. People may freely and voluntarily apply to these positions through a selection process.

The aim of the mobility is to promote the availability and fitting of the best resources in an efficient manner, and the adaptation of the person/position, thus contributing to the motivation, development and career progress of ACCIONA Energía's staff as a whole.

Through the corporate internal mobility instruction, consistency and high quality standards are ensured in all internal mobility processes globally. The main pillars of the corporate mobility framework are the following:

1. To provide opportunities for development, evolution and professional career, for the growth of professionals, by achieving a good fit between the candidate and the position and between the position and the development plan of the professional in question.
2. To foster a common culture as a company that offers equal opportunities of development in different sectors, positions and geographic locations in a transparent manner, in order to implement its diversification and internationalisation strategy.



3. To develop a route for internal promotion instead of external recruitment, thus conserving expertise, and promoting the economic and operating efficiency.

To this end, ACCIONA Energía carries out the following actions to encourage and facilitate internal mobility among employees:

1. Up-to-date maintenance of **vacancies** on the internal talent management platform and distribution of a **weekly newsletter** containing the most relevant vacancies. This allows for a *global talent pool* and mobility of higher quality and efficiency.
2. **International mobility questionnaire.** The short-, medium- and long-term interests of employees in international mobility are collected annually in a completely voluntary questionnaire.
3. Storing and updating the organisation's interests in mobility allows for the identification and development of internal talent, aligning individual employee objectives with the company's objectives, fostering organisational satisfaction and commitment.
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 ACCIONA Energía operates. All of this, ensuring agility and transparency throughout the process and, above all, accompanying employees at the vital moment of embarking on an international experience.

As a result of the above actions, the following milestones have been achieved in 2023, related to international internal mobility:

- The percentage of vacancies filled by internal mobility was 26.84 %.
- Launch of the third edition of the international professional development programme, Role Swap Programme, and the first edition of the corporate IDP (International Development Programme).

The Role Swap programme allows high-potential employees from the same department, but from different countries, to temporarily exchange their positions, thus fostering a three-month international career development experience. The initiative not only enhances global perspectives and multicultural diversity, but also boosts professional development and facilitates the exchange of synergies and best practices. In this way, significant benefits are generated both for the retention and professional development of high-potential employees, as well as for ACCIONA Energía's internal efficiency. In 2023, 13 employees from Spain, USA, Australia, India, Mexico, Chile participated.

On the other hand, the "IDP" (International Development Programme) is a corporate international professional development programme, lasting 6 to 24 months, in which high-potential employees enjoy an international mobility experience in one of the countries in which ACCIONA Energía operates.

Its implementation encourages the internal movement of employees in technical/specialist roles to different countries, promoting the acquisition of new competencies and skills and increasing global *networking*.

This is a unilateral, temporary, international assignment to promote career development and retention of high potential employees. In 2023, a total of three employees from Spain and Mexico have been part of this programme with Australia, the United States and Spain as destination countries.

	<b>2023</b>
Percentage of posts filled internally	26.84 %

## Employee satisfaction and engagement

People's satisfaction and commitment are the key attributes of the relationship model that ACCIONA Energía aspires to maintain with its employees through its PEOPLE strategy. The Engagement & Sustainability Global Barometer, globally carried out every year since 2021, allows us:

- To better understand what helps employees to be more productive to fulfil the company's strategy.
- To establish a specific metric system to follow up the evolution of the employees' commitment. To also analyse the correlations between the engagement and the 2025 SMP pillars and objectives and the PEOPLE strategy.
- To identify support measures based on a series of factors such as the following: knowledge of the critical transformation levers, satisfaction with SMP's key objectives, vision of the strength of the ACCIONA Energía brand locally to attract talent, promotion of a work environment that values diversity and the perception of internal advancement towards an inclusive culture.

The 2022 survey -which used Kincentric methodology- and which results were analysed in 2023, showed that ACCIONA Energía's global employee engagement stands at 69 %. Participation also increased by 58 % in the number of responses. Although higher levels of participation usually lead to an increase in critical appraisals, ACCIONA Energía maintains a similar level of employee engagement to previous years.

In 2023, it was decided to re-establish the employee listening cycle, from August to September, so that it is aligned with the processes in which employees are involved. The next survey will be launched in early 2024.

## EVOLUTION OF EMPLOYEE TURNOVER BY GENDER, AGE AND WORKPLACE (%)

	2021	2022	2023
Turnover among men	5.97 %	6.49 %	7.26 %
Turnover among women	4.53 %	7.13 %	10.07 %
Turnover of people under 31	9.88 %	16.05 %	14.22 %
Turnover of people aged 30-50	5.01 %	5.31 %	6.90 %
Turnover of people over 50	4.04 %	3.65 %	6.54 %
Turnover in Spain	3.14 %	2.20 %	3.57 %
Turnover of people working outside Spain	9.12 %	12.20 %	14.85 %
Total turnover	5.61 %	7.48 %	8.19 %
Voluntary turnover*	4.95 %	6.67 %	7.99 %
Total number of employees who have left the company during the reference period		179	253
<b>Average recruitment cost/ Equivalent Average Workforce</b>	<b>€1.200</b>	<b>€1.200</b>	<b>€2.323</b>

\*better adjusted image of the company's turnover. The % of turnover shown in the table is based on voluntary turnover.

\*Voluntary turnover = no. of voluntary departures of employees with indefinite contracts / Equivalent Average Workforce with indefinite contracts. Since January 2021, we take data managed through Workday, which allows us to incorporate a broader type of movements in people joining/leaving the company that reflect a more accurate picture of the employee turnover in the company. A new methodology has been developed to calculate the average cost of contracting, which includes the complete on boarding process flow.

## Social protection (S1-11)

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 company-provided benefits.

## COMPENSATION POLICY

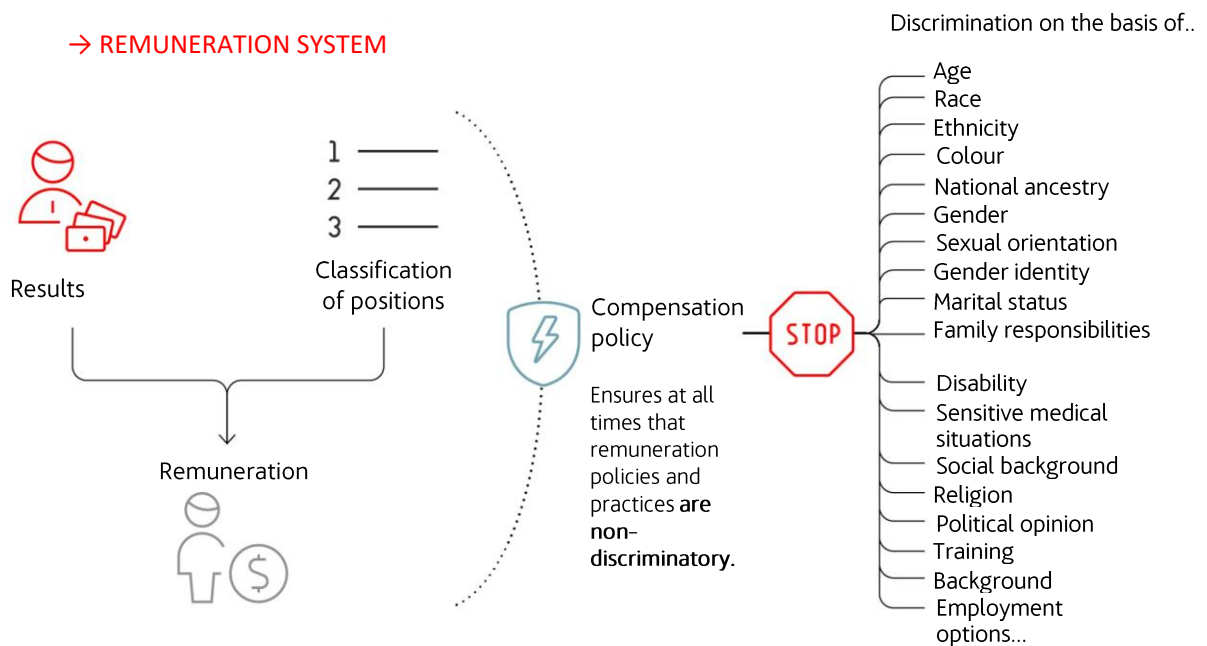
At ACCIONA Energía, priority is given to maintaining a competitive compensation and benefits system, aligned with transparent and responsible management. This is key to building trust among shareholders, employees and the market in general.

In particular in the pay review process, the company bases the pay review process on the judgement of the Compensation Managers who determine the compensation proposals for their teams, based on a defined budget, which is finally reviewed and approved by the CEO. During the Salary Review process, HR managers, with the support of compensation and benefits experts, facilitate the decision-making process for Compensation Managers so that the decisions reached are closely linked to the company's strategy, flexibility, sustainable value creation and in the spirit of achieving the best interests of the business and of each country with respect to people management. Different criteria are used during the decision-making process, such as internal equity and external competitiveness based on market data and applicable legislation in each country.

The company engages in its business in 22 countries and in all it rewards its employees according to the following criteria: sectoral and geographical competitiveness, internal equity and merit. Also, based on the current laws, the employees' remuneration is subject to the applicable collective bargaining agreements. In 2023, the company handled 26 collective bargaining agreements, 16 of them in Spain.

### ACCIONA Energía's remuneration system

The strategy of keeping a competitive remuneration system shows in the remuneration policy, which aims to establish a suitable remuneration method that fits the people's engagement and responsibilities. The target is to retain and motivate our employees and also contribute to help ACCIONA Energía meet its strategic goals within the framework of its business.



### Fixed remuneration plan

An annual salary review process is carried out in order to improve internal equity within the company, as well as to recognise key positions and profiles with high development or high potential.

In the process, a budget is defined and approved on the basis of the results of each business and the particularities of each country. Each manager decides on the increase applied to the fixed remuneration based on the above criteria, consolidating at the higher levels of the company.

In 2023, a project was launched in Australia and Chile to implement an objective process to make a systematised recommendation for salary increases based on a merit matrix. This matrix takes into account factors that seek to achieve an improvement in the company's internal equity such as market positioning, employee performance level, potential and approved budget. This initiative is expected to be implemented globally by 2024, with an estimated 2,020 employees in all the countries where ACCIONA Energía operates.

TOTAL AVERAGE REMUNERATION BROKEN DOWN BY GENDER, AGE AND JOB CLASSIFICATION (€)

PRODUCTION AND BUSINESS DEVELOPMENT AREAS*		2022			2023		
GENDER	PROFESSIONAL CATEGORY	< 31	31-50	> 50	< 31	31-50	> 50
Men	Executives and Managers	54,576	90,501	136,753	78,728	99,155	130,118
	Technical and Qualified Staff	46,598	54,197	65,620	47,691	55,654	64,759
	Other personnel	26,535	28,680	32,970	27,773	30,682	34,122
Women	Executives and Managers	-	77,821	143,404	52,900	89,636	138,964
	Technical and Qualified Staff	39,496	49,862	54,902	42,616	50,657	56,684
	Other personnel	17,429	29,676	35,519	19,422	30,741	35,020
SUPPORT AREAS*		2022			2023		
GENDER	PROFESSIONAL CATEGORY	< 31	31-50	> 50	< 31	31-50	> 50
Men	Executives and Managers	-	95,772	120,533	55,900	95,538	116,682
	Technical and Qualified Staff	35,726	42,454	83,208	44,243	44,637	80,160
	Other personnel	-	16,017	-	-	16,688	-
Women	Executives and Managers	-	95,609	118,375	91,081	87,973	105,872
	Technical and Qualified Staff	39,718	45,098	55,483	40,094	48,028	51,609
	Other personnel	-	27,409	-	-	30,689	-

\* The calculation methodology may use values with decimals that will later be rounded off.

The average total remuneration for executives who were not executive directors in 2023 was €155,667 for men and €159,113 for women; the total average remuneration was €156,437 thousand

### Variable remuneration plan: ACCIONA Bonus

The programme for employees with variable remuneration is based on objective and pre-established metrics. The programme has been in operation since 2012 and depends on the company's financial results, its results in sustainability and the individual goals of each employee. 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 ( *clawback* clause).

In accordance with the objectives set out in the Sustainability Master Plan (SMP), ACCIONA Bonus will be applied internationally.

STANDARDISED STRUCTURE OF OBJECTIVES THAT MAKE UP THE BONUS

ACCIONA ENERGÍA'S OVERALL RESULTS	SPECIFIC TARGETS	INDIVIDUAL TARGETS	CRITERIA LINKED TO SUSTAINABILITY
They represent at least 5 % for all employees and 10 % for executives.	Relative to the country, or business unit with its own income statement.	The basis is the individual assessment of performance.	They represent 12.5 % of the targets. They have progressively increased their weight, from the 3.5 % applicable in 2019.

For ACCIONA Bonus, managers propose the level of achievement of individual objectives on a platform that applies to the calculation of the individual part of the bonus. The criteria for this tranche are established according to the personal contribution to the business results:

- Specific contributions (individual objectives) and technical excellence in the work that contributes to progress made in the income statement.
- Tasks and objectives planned at the start of the year, as well as any objectives or priorities that may arise subsequently.
- Support for long-term transformational projects: sustainability, digitalisation, etc.
- Contribution to the multidisciplinary and multifunctional work teams.
- Contribution to the results in terms of flexibility and capacity to adapt to the requirements.

### Criteria linked to sustainability

In order to incorporate the sustainability and decarbonisation strategy across the board, ACCIONA is gradually increasing the weight of sustainability performance in the ACCIONA Bonus (generally applied in the businesses and countries where it operates).

The ACCIONA Bonus includes sustainability objectives and risk management within the framework of the Sustainability Master Plan areas. From an initial 3.5% in 2019, its weight has reached 12.5% in 2023, which has meant meeting the target set by the Sustainability Master Plan initially foreseen for 2025.

To assess compliance with the PEOPLE indicator, the Company will analyse the specific dimensions with the greatest possible breakdown of application (measurement clusters) so that the measurement will be made according to the employee's specific sphere of influence whenever information can be obtained in sufficient detail for its calculation; including, where appropriate, specific information relating to the country or business unit with its own income statement, or when this is not possible, broader measurement clusters will be used. and are related to objectives such as:

- **People:** health and safety (minimising accident rates), development and incentives, diversity and inclusion, increase in the number of women in executive and management roles, and training.
- **Leadership:** positioning as leader in the most prestigious rankings and indexes.
- **ESG budget:** ESG budget definition and compliance

### ACCIONA BONUS IN FIGURES

No. of employees benefitted	2,130
% of executives	2.7 %
% of managers and technical and support staff	72.1 %
No. of countries	21

## Employee benefits

In 2023 the social benefits offered by ACCIONA Energía are:

- **Accident coverage:** covering the commitments undertaken in the different collective bargaining agreements that may apply and accident policies insuring expatriates and their families in case of an incident that causes death or absolute permanent disability.
- **Life insurance:** insuring the commitments assumed in collective agreements in case of death or disability for any reason.
- **Travel assistance:** it covers business trips globally for less than a year. For expatriates and their families, it is complemented with a health insurance policy for expatriates.

In addition, the Flexible Remuneration Plan allows the company's employees to optimise their salaries nationally. The employees can select, acquire and/or hire certain benefits with important advantages, which will allow them to maximise their remuneration. The following products and services are adapted to their needs: medical insurance, meal and child-minding vouchers, transport passes, training programmes linked to their professional development, share-purchase schemes to encourage participation in the ACCIONA Energía share capital and increase of life and accident insurance and pension plan.

In 2023 ACCIONA Energía made the following benefits available to its employees:

- Health insurance for employees, their spouses and children.
- Meal vouchers for employees working at sites that do not currently have a canteen or a similar benefit.
- Childcare vouchers for employees with children aged 0 to 3 who need this service.
- Transport pass for employees who buy their ticket or transport pass (bus and underground) with a tax-exempt pass within the limits established by law.
- Training and qualification programmes in 2023 where the employees can choose the ones suitable for their job and professional development.
- Share Purchase Plan aimed at all ACCIONA Energía's employees in Spain.
- Life Insurance and Accident Insurance: possibility to increase the cover of these two products without tax benefits from the tool which manages products contracted under the Flexible Remuneration Plan. Both products are complementary and additional to any insurance cover defined by ACCIONA Energía for its professionals.

Some of these measures are made available to employees to enable them to optimise their pay and plan ahead to control their finances, as part of the concept of financial well-being. Specifically during 2023, ACCIONA Energía implemented a new social welfare product in its Flexible Remuneration Programme consisting of a Savings Insurance linked to employee Retirement.

The current Shareholder Plan aims to encourage employees to become shareholders in the company. This is a voluntary scheme that allows the company to redistribute part of the variable monetary remuneration and/or sets a limit of 12,000 euros per year by awarding shares in the organisation according to the regulatory framework, which foresees tax benefits for this type of plans. This scheme is aimed at all ACCIONA Energía employees who are tax residents in Spain to be able to hold company stock.



In 2023, 401 employees participated in the Shareholders's Scheme, which brings the number of shares in ACCIONA Energía delivered under this plan up to 77,139.

Under this plan, employees may voluntarily substitute an amount of their variable remuneration for the acquisition of ACCIONA Energía shares, with an incentive paid by the company, provided a three-year retention requirement is met. The aim of such schemes is to achieve greater employee engagement, motivation and loyalty. It is foreseen that this plan will be extended to other countries during 2024, with a view to becoming a global plan in the medium term.

In addition, two company share purchase plans have been launched in Australia in 2023 for employees with tax residence in Australia. One of them provides for a limit of A\$1,000, in line with the current Aussie regulatory framework that favours such schemes for tax purposes. The second plan allows the employee to replace part of his or her variable remuneration with shares in the company up to a maximum of \$30,000 and a company-funded award of 25 % of the amount replaced.

ACCIONA Energía has implemented the following social benefits throughout 2023:

- Activation in Poland of a voluntary employee pension plan. The company will contribute up to 2.5 % of the employee's remuneration.
- Launch of life and disability insurance coverage in Croatia, aligning it with the policy of the rest of the Group.
- Extension of welfare cover in Australia through two company share purchase plans for employees with Australian tax residency.

## Adequate wages (S1-10)

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. It is always ensured to comply at least with the minimum wages established by law and collective agreements of workers determined by each State, taking into account the purchasing power, the evolution of national productivity, as well as the amounts, distribution and growth of wages.

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 on a recurring basis to define the remuneration benchmarks for each country using market data from other companies with a presence in the country concerned and acquired from suppliers with international experience in the field of remuneration. In any case, respecting the minimum remuneration established in each country by law or by collective agreements where this is the case.

## RECONCILIATION OF WORK AND FAMILY LIFE (S1-15)

The company is committed to a good work-life balance as a means to promote equality and, thus, it supports families, beyond regulatory compliance, in the businesses and the different territories where it operates.

A support programme for mothers and fathers has been developed with universal measures and a co-responsibility based approach. The main measures implemented are:

- Support programme for pregnant women with six-hour working days with no salary cuts, parking spaces and financial help to pay for travel expenses to medical tests.
- Paid maternity/paternity leave for the main carer, longer than the legal minimum, of up to 19 weeks that can be alternatively split between the parents.
- Paid maternity/paternity leave for the supporting carer –also longer than the legal minimum– of up to 19 weeks that can be alternatively split between the parents.
- Programme for parents with children suffering from serious illnesses, with a part-time working day with no salary cuts, supplementing the legal frameworks in each country.
- Improvement of the policy of advances for cases related to child care.
- A maternity bonus for parents as financial support for births, irrespective of gender. The amount is increased in the case of multiple births.

These measures are in addition to other measures in place such as teleworking, flexible entry and exit times, straight shifts, and part-time options, as well as canteen services, medical centres, breastfeeding rooms, childcare support, physiotherapy and sports club at the sites. In countries such as Australia, United States and South Africa there are special measures for flexible working hours for new parents and for childcare, which are higher than the legal minimums.

The introduction of information technologies in the employment context has multiple advantages such as increased efficiency and productivity, and improved flexibility. However, it also brings disadvantages that must be addressed and solved. The collective agreement in the Energy business undertakes to respect the right to digital disconnection in accordance with current legislation.

### Reconciliation policies

ACCIONA Energía's commitment to work-family life balance is shown in its Diversity, Equity and Inclusion policy, that promotes professional and personal life integration and, thus, it promotes measures that allow work-personal life balance, offering flexible mechanisms (maternity and paternity leave, professional pauses, work return programmes, timetables, distant working, care of dependants, care of infants, etc.) that promote equal opportunities, well-being and commitment in accordance with the best practices of the places where it operates in its sectors of activity.

In 2023, the company strengthened this commitment with the creation of the Leave Review Committee, a body responsible for addressing the company's work-life balance and integration strategy and whose primary objective is to create a framework that guarantees equality and non-discrimination in access to work-life balance measures for all company employees. The Committee is made up of labour representatives from all businesses and regions.

## Work-life balance objectives in global work environments

As a global company operating internationally and operating in many different work environments, the company has set itself the goal of responding to the new needs of work-life balance by complying with regulatory frameworks, adapting measures and actions according to these needs and progressively extending them to all company activities.

### EMPLOYEES ENTITLED TO MATERNITY/PATERNITY LEAVE (NO. OF EMPLOYEES)

DATA*	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Number of employees with the right to maternity/paternity leave	1,437	445	1,882	1,404	435	1,839
Number of employees who took maternity/paternity leave	90	18	108	86	14	100
Number of employees who returned to work after taking maternity/paternity leave	90	18	108	86	14	100
Number of employees who returned to work after taking maternity/paternity leave and remained in their jobs twelve months after returning to work	90	18	108	82	14	100
Retention ratio	100 %	100 %	100 %	95 %	100 %	96 %

The calculation methodology may use values with decimals that will later be rounded off.

\* The data provided can only be provided from Spain.

## COVERAGE OF COLLECTIVE BARGAINING AND SOCIAL DIALOGUE (s1-8)

ACCIONA Energía has a collective bargaining strategy that involves collaboration with trade unions at national and international level, as well as the implementation of agreements that establish fair working conditions and wages. These agreements and the promotion of works councils serve as a framework for collective bargaining and respect for workers' rights at the global level.

In several countries, ACCIONA Energía's collective bargaining agreements cover all employees, guaranteeing the protection of their rights. For these situations, mechanisms have been established to control the conditions agreed, applied both to the company and to its suppliers.

The company maintains a continuous and regular dialogue with all trade union and workers' associations in order to anticipate any problems that could lead to conflicts and minimise their possible impact.

Collective bargaining is carried out by the Labour Relations, Human Resources and Business teams, focusing on:

1. The expectations of the sector and of workers' representatives, either through direct proposals or in response to regulatory initiatives.
2. Economic and social assessment of the company, the sector and the business project, including the impact of labour demands.
3. The organisational effects of the suggested changes, analysing their possible impact on productivity and management.
4. Assessing the risk of labour disputes and their potential economic and reputational impact.

ACCIONA Energía prepares business proposals for negotiation, as well as responses to regulatory changes through national business organisations.

The relationship with national trade unions is maintained at the highest level in each country and sector. Collective bargaining and dialogue with local trade unions and workers' legal representatives is conducted through the Labour Relations and Human Resources teams in each country or project, with the support, when necessary, of the central teams in Spain or the corporate teams. In addition, the corporation occasionally liaises with major international trade unions to support and coordinate labour relations at the global level. In 2023, a global agreement has been signed with the BWI union covering all of these practices and requirements.

ACCIONA Energía is committed to guaranteeing respect for the rights of all workers involved in its value chain. The established collective agreements regulate their validity and the procedures to be followed, including the formation of joint commissions in charge of interpreting the agreed text. In addition, these agreements define the mechanisms for the submission of complaints and the negotiation of their clauses.

COLLECTIVE AGREEMENTS

Number of total agreements managed	26
Agreements managed in Spain	16

EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS BY COUNTRY (%)

COUNTRY	EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS
Spain	100 %
Australia	100 %
Chile	100 %
United States	100 %
Mexico	100 %
Ukraine	100 %
South Africa	100 %
Rest of the world	100 %
<b>Total employees</b>	<b>100 %</b>

Social dialogue

ACCIONA Energía prioritises constant and regular dialogue with all trade union and workers' associations, with the aim of anticipating any situation that could generate conflict, thereby reducing its potential impact.

Each country and each company have established formal channels to file complaints and claims, as well as communication channels with employees and HR managers, as well as workers' legal representatives without prejudice to the direct communication every worker can initiate with their contact person in the relevant HR department.

ACCIONA Energía's policy on social dialogue remains firm in all the countries in which it operates. Open lines of communication are encouraged between employee representatives and those responsible for Human Resources and/or Labour Relations, thus promoting an atmosphere of mutual understanding in each entity and region.

## HEALTH AND SAFETY (S1-14)

### Responsibility for Health and Safety management at ACCIONA Energía

Health and Safety responsibilities are integrated at all levels of ACCIONA Energía. The Audit and Sustainability Committee is responsible for supervising compliance with the company's Human Resources and Occupational Risk Prevention Policy which, through its principles, establishes the care and continuous improvement of the occupational health and safety of the company's own employees, as well as those of collaborating companies.

[ACCIONA Energía's Human Resources and Occupational Risk Prevention Policy](#), updated in April 2022, focuses on promoting ethical and safe behaviour, respecting Human Rights, preventing occupational risks and supporting the professional development of employees. The general objectives include safety and well-being at work, respect for human and labour rights, prevention of occupational hazards and promotion of effective equality.

The policy covers all ACCIONA Energía operations and extends to employees and collaborators in all countries where it operates, focusing on stakeholders such as employees, collaborators and associated legal entities.

The highest level of responsibility for policy implementation within the company is the Chief Executive Officer, who aligns its practices with the conventions of the International Labour Organisation and supports the objectives of the Seoul Declaration on Safety and Health at Work.

The policy embodies a commitment to active communication and consultation with stakeholders. This approach focuses on collaborative risk identification and analysis, promoting a safe and conscientious working environment.

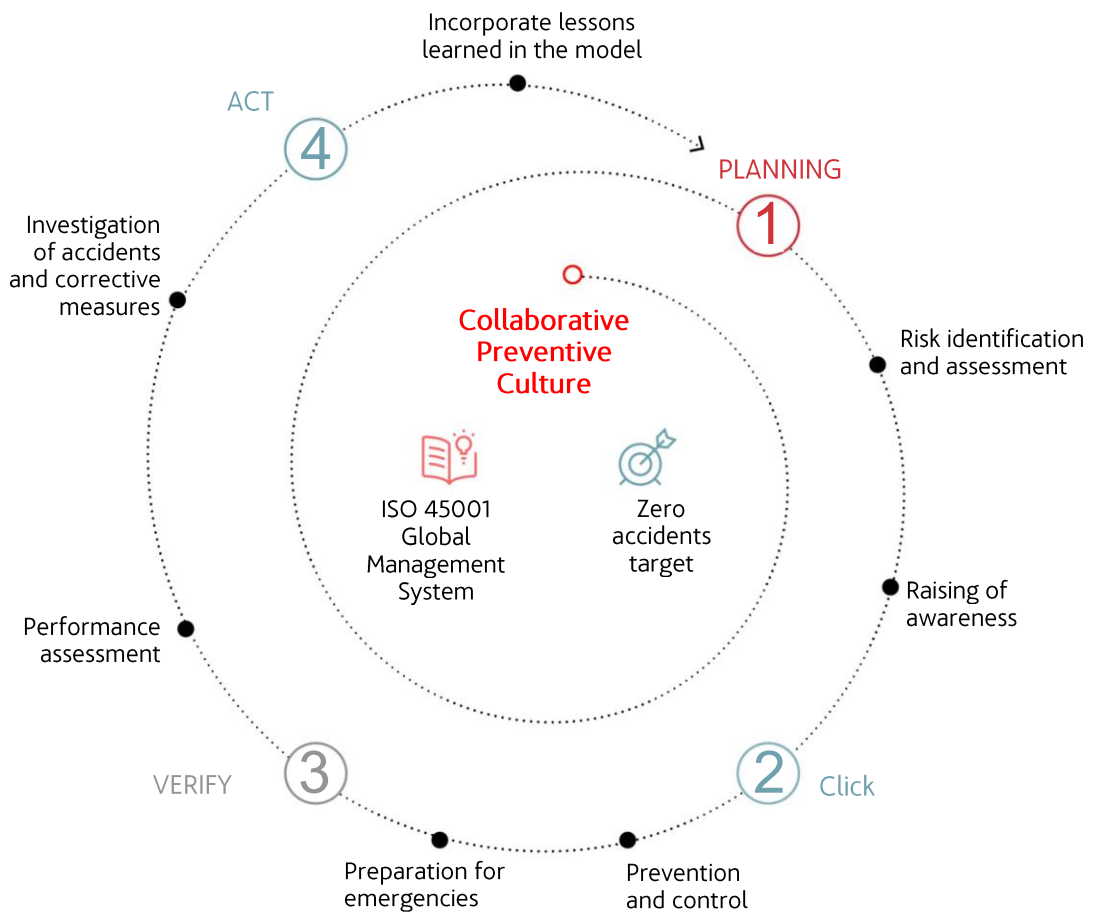
ACCIONA Energía has established a specialised department focused on managing the risks associated with operations in the energy sector. This department is responsible for assessing the health and safety risks inherent in all phases of the company's portfolio of activities: design, construction, operation and maintenance, setting and enforcing occupational health and safety standards and adapting to the specific challenges of the energy sector.

### Risk management system

The possible risks for ACCIONA Energía involving health and safety arise from the activities it carries out in the construction and operation and maintenance of its facilities. For this reason, the company considers it essential to maintain a preventive culture conducive to generating confidence and well-being among all its workers. This consideration extends to both its own employees and those working in the value chain. For this reason, responsibility for health and safety is assumed and shared by each and every one of the people who make up the company.

ACCIONA Energía has an Integrated Occupational Risk Management System for the entire company which establishes the minimum health and safety requirements that should be taken into account in any of its companies and countries and for all its value chain. In 2023 the certification in all of them in accordance with the ISO 45001 standard was maintained.

→ INTEGRATED OHP MANAGEMENT SYSTEM



## System for identification and management of occupational risk

ACCIONA Energía has a system for identifying and assessing any possible risks related to each post. This assessment and any control measures for minimising the probability of them occurring are documented in specific procedures for each facility. The risk analysis determines the points that are critical in each centre and the associated preventive action, which affects not only its own employees but also those of contractors and collaborators.

In addition, the facilities have their own emergency plans with guidelines on how to proceed in emergency situations. Employed or subcontracted personnel can report any hazardous situation they detect by means of an event and hazardous situation management tool (ENABLON). On the other hand, any person that identifies a risk in any of the facilities may communicate it by sending a message to the email address [safety.energy@acciona.com](mailto:safety.energy@acciona.com).

As a highlighted good practice, ACCIONA Energía makes and distributes among its stakeholders "safety alerts" involving any incidents from which lessons have been learned that could be of interest to the sector. Those alerts that, due to their global scope, may be of interest to any person, are accessible through ACCIONA Energía's website ([https://www.acciona-energia.com/es/nuestro-proposito/trabaja-con-nosotros/seguridad-y-salud/?\\_adin=01832793422](https://www.acciona-energia.com/es/nuestro-proposito/trabaja-con-nosotros/seguridad-y-salud/?_adin=01832793422)).

The company also actively collaborates with public authorities, such as the European Health and Safety Agency, on initiatives to promote health and safety in the workplace (<https://healthy-workplaces.osha.europa.eu/en/campaign-partners/ACCIONA-energia>).



## Stress at the work station

ACCIONA Energía believes that mental health care is essential in creating an atmosphere of harmony and wellbeing for all the company's employees. ACCIONA Energía carries out assessments to identify possible risks related to work-related stress, and implements measures and initiatives to combat it. The company has Occupational Health experts trained in aspects of working life directly related to the organisation or content of the work. The service is open to all employees without limitation.

Through different initiatives, such as workshops on occupational and and emotional wellbeing, ACCIONA Energía continues to raise awareness for its employees about work-related stress, aiming to train more and more people.

## Extending the commitment to prevention to the supply chain

One of ACCIONA Energía's main goals is to extend its culture and commitment to health and safety to the entire supply chain. At the time of contracting, all suppliers must undergo a process of technical qualification in risk prevention as a prerequisite for their contracting. ACCIONA Energía has measures in place for supervising prevention management from its supply chain, which covers all phases of the process, from tendering to completion:

- Corporate bidders must answer a questionnaire to show proper safety and health management. Only the companies that show the minimum level required pass the first screening.
- The score in Health and Safety influences the final selection of the supplier.
- Planning of the works to agree on the safety measures is materialised in several obligatory meetings before the commencement of the works.
- All activities carried out by contractors are monitored and controlled.
- The management boards of each project or activity integrate to the same extent the performance of safety and health of employed and subcontracted personnel.
- During and after the provision of the service contracted an assessment is made of the health and safety performance to identify lessons learnt and to condition future tenders for suppliers.
- In addition, the company periodically organises meeting points with suppliers to share experiences and agree on health and safety actions to be taken.

The Health and Safety management system includes the activities of all contractors, suppliers and collaborators, defining the processes and indicators necessary for the planning and monitoring of preventive activities.

### Think Safe Project: ORP Recognition

In April 2023, ACCIONA Energía received the "Recognition of Merit in Business Management" from the ORP International Foundation for its Think Safe preventive culture improvement programme, which demonstrates the company's commitment to reducing workplace accidents based on the integration of a preventive culture throughout the value chain.

The Think Safe programme lays the foundations for ACCIONA Energía's occupational risk prevention plan in all its projects and promotes the safety, health and well-being of the company's workers and subcontractors, actively promoting a risk-free working environment. It is global in scope, applying to all countries in which the company operates and covering all departments.

The ORP Business Awards were established eleven years ago with the aim of rewarding professionals and companies for their involvement, work and results for the benefit of occupational risk prevention. They are part of the ORP Congress, a meeting point for prevention and a place to discuss the latest advances in ergonomics, safety, hygiene, occupational medicine, training and, for example, psychosociology.

## Occupational illnesses

### Prevention and healthy lifestyles

To evaluate the possible impact of occupational risks on the health of workers, annual medical check-ups are offered, adapted to the specific risks of each employee. Moreover, this information is used to conduct an annual analysis on a global scale to assess health in the workplace of ACCIONA Energía as a whole.

The company also carries out campaigns for the prevention and early detection of diseases, in addition to monitoring workers who travel internationally, providing them with medical information on the destination area and immunisation if necessary. The company also enters into agreements with private health companies, offering appropriate services and conditions.

In 2023, as in previous years, no cases of professional diseases have been reported.

ACCIONA Energía has a Health and Wellness Programme to promote comprehensive employee care. It is a three-part programme focussed on a healthy diet, physical activity and emotional management. The initiatives developed as part of the Health and Wellness Plan include:

- Medical video-consultation seven days a week in Spain for employees and health advice in face-to-face

consultation.

- Identification, monitoring, awareness-raising and training on stress at the work station
- As a fundamental core the programme revolves around the importance of a healthy diet, doing exercise and taking care of one's emotional health.

### Health and Safety training actions

ACCIONA Energía understands that one of the most effective measures to prevent occupational risks among its employees and subcontractors is to have proper training, based on health and safety training in accordance with the risks and preventive measures established for all its activities.

As proof of ACCIONA Energía's commitment to employee training, more than 2,000 health and safety training activities were carried out in 2023, in compliance with the established Occupational Risk Prevention Training Plans. Along these lines, there have been a total of 33,069 training hours on occupational risk prevention in 2023.

Similarly, within the management of subcontracted companies, ACCIONA Energía supervises, through the corresponding policy of coordination of business activities, that subcontracted workers have received the necessary training in Occupational Risk Prevention for the tasks they are to perform at its facilities.

ACCIONA Energía has internal communication mechanisms that are essential for raising awareness and training its employees in accident prevention and in caring for their health and safety. The most widely used dissemination tools include the *intranet*, health and safety bulletins, e-mail, the suggestions box and communications via posters, as well as specific actions at the work centre, such as the "Five minutes of safety" practice at the start of each working day in its Construction and Operation and Maintenance activities. Its objective is to exchange information between those responsible for the projects or installations and the workers before the start of the working day, in order to detect and prevent dangerous situations or unsafe acts, ensuring that before the start of the work planned for that day, all workers are aware of the risks and the applicable preventive measures.

### Training and awareness-raising

ACCIONA Energía has internal communication mechanisms that are key to preventing accidents and preserving the health and safety of employees. Among the most widely used tools are the intranet, newsletters, e-mail, suggestion box and messages via posters, as well as specific actions in the workplace.

## Act Safe and Build Safe projects

The company has two initiatives with a common structure and operation but with their own particular characteristics: Act Safe and Build Safe.

Both initiatives utilise common programmes such as “Preventive Observations”, “Personal Action Plan” and “Rules that Save Lives”; and, specifically, we coordinate actions such as training in the “Risk Factor” in operation and maintenance (O&M) of facilities or the “Learning from Major Incidents” programme included in Engineering and Construction (E&C).

Both projects rely on their own Management and Performance Committees, led by the management of both departments with the active participation of the heads of the different businesses.

Key health and safety data in 2023 relating to the scope of its two main activities (Operation and Maintenance; Engineering and Construction) include the following:

- 43 facilities in operation with more than 2,000 days (5.5 years) without Accidents without leave of absence.
- 6867 Safety inspections carried out in 2023.
- 2007 health and safety training activities
- 216 Meeting Points with suppliers on health and safety
- 236 emergency simulations
- 8 security alerts issued
- 6524 security contacts developed and distributed to our stakeholders
- 8547 Preventive Safety Observations reported

## ACCIONA Energía's strategy to create safe environments

The 2025 Sustainability Master Plan and the PEOPLE programme set out actions to comply with the company's commitments in terms of Occupational Risk Prevention. For this objective, programmes are designed to impact on the company's organisational conduct in order to identify and mitigate possible safety-related risks.

The company uses the representative bodies required by the laws in the countries where it operates, such as the Health and Safety Committees in Spain, as a channel for consultation and participation. Employees also have communication tools through which they can report any incidents or possible risks related to occupational safety. In 2023, more than 8,500 preventive observations have been reported.

The company cooperates with international organisations for the definition of safety at work standards in the renewable energies sector, specifically ACCIONA Energía is an active member of the Global Wind Organization (GWO), where the Health and Safety Manager holds the position of Vice-Chair of the organisation's Steering Committee, whose objective is to promote occupational health and safety standards worldwide in the wind energy sector. This platform promotes safe working environments based on the technical qualifications of the professionals working in the sector, especially in countries where the level of training is lower.

### Performance targets and metrics

As part of its occupational risk prevention management system, the company sets annual improvement targets covering all its activities and facilities. In 2023 these targets have been:

- Decrease by 5 % the average of the last three years of the accident frequency rate with sick leave of employed and subcontracted personnel.
- Extend the Drive Safe programme to all countries where there is an established structure already in place.
- Define and implement a "5E" programme, in which 5 selected recurring Events undergo an in-depth review to analyse causes, implement preventive actions, and verify their effectiveness. This programme will begin in the Construction area.
- Develop and advance the health and safety criteria to be applied in the company's offshore project environment.

### Performance metrics for occupational risk prevention

#### PERCENTAGE OF EMPLOYEES COVERED BY A HEALTH AND SAFETY MANAGEMENT SYSTEM

	2023
Energy	100 %

#### FREQUENCY RATE EVOLUTION

	OWN				EXTERNAL			
	2020	2021	2022	2023	2020	2021	2022	2023
ACCIONA Energía	0.11	0.31	0.18	0.29	0.69	0.78	0.50	0.45

Frequency rate: (no. of lost time accidents/hours worked) x 200,000.

**SERIOUSNESS RATE EVOLUTION**

	OWN			
	2020	2021	2022	2023
ACCIONA Energía	0.48	4.77	2.01	1.88

Severity rate: (no. of working days lost due to work accident/hours worked) x 200 000.

All accidents with a leave of absence involved male staff. No women suffered any workplace accidents in 2023.

In terms of the frequency of accidents resulting in sick leave for all own and external employees, the same values were repeated in 2023 as in 2022, the lowest figures in the history of ACCIONA Energía. The company's efforts to create a safe working environment have resulted in the consolidation of an overall FI (own and external) of 0.39 for the second consecutive year, even with a 23 % increase in hours worked in 2023.

Among all activities and businesses, Construction stands out, where despite having doubled its activity (in terms of own and subcontracted personnel, it has gone from 4.1 million hours worked in 2022 to 6.4 million in 2023), there have been six accidents with sick leave, compared to seven in the previous year, which represents an improvement of 53 % in its Frequency Rate.

**Fatal accidents**

In July 2023, an ACCIONA Energía Spain employee died while carrying out maintenance work on one of the wind turbines at the El Cabrito wind farm.

**NUMBER OF RECORDABLE ACCIDENTS OF OWN STAFF**

RECORDABLE WORK-RELATED ACCIDENTS			OCCUPATIONAL ILLNESS		
MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
21	2	23	0	0	0

In 2023, there were no occupational illnesses in ACCIONA Energía's own workforce.

The total number of recordable accidents of external employees in 2023 is 53.

**EVOLUTION OF IN MISSION AND IN ITINERE ACCIDENTS, WITH AND WITHOUT SICK LEAVE, OF OWN EMPLOYEES**

	2020	2021	2022	2023
Commuting accidents	12	15	2	5
Work-related mileage accidents	3	4	0	3

## Road safety

ACCIONA Energía has a road safety programme with the name Drive Safe for preventing occupational accidents while commuting or on work-related travel. During 2023, the programme has met the target of being implemented in all countries where the company operates. It consists of several levers of action that cover the training needs of drivers and the improvement of their driving habits, as well as covering the needs of company vehicles and the planning of business trips.

As a result of the implementation of the Drive Safe programme, despite a 50 % increase in the number of own employees compared to previous years (with a consequent increase in the number of journeys on the way to and from work), the number of road accidents in absolute terms has been on a downward trend since 2020. This data also takes into account an improvement in road safety awareness and preventive culture, which translates into an increase in the reporting and recording of such incidents.

### EVOLUTION OF ROAD ACCIDENTS, WITH AND WITHOUT SICK LEAVE, OF EXTERNAL WORKERS

	2020	2021	2022	2023
Work-related mileage accidents	5	3	4	3

In 2023, the total number of hours worked by external staff has increased by 8 % compared to the total number of activities in 2022. Despite this increase, there has been a reduction in the number of accidents on mission among this group.

### ISO 45001 CERTIFICATION

	2021	2022	2023
ACCIONA Energía	100 %	100 %	100 %

ACCIONA Energía maintains the certification of 100 % of its activity in accordance with the ISO 45001 international standard for occupational health and safety management, within the *multi-site* certification modality, which reinforces the Company's solid commitment to occupational risk prevention in an environment of growth and development of new activities.

### EVOLUTION OF THE RATE OF EMPLOYEE ABSENTEEISM

2020	2021	2022	2023
0.92	0.19	3.21	3.48

Absenteeism rate: (no. of days lost due to absenteeism/no. of days worked) x 100

### NUMBER OF DAYS LOST DUE TO ABSENTEEISM

	2022		2023	
	WOMEN	MEN	WOMEN	MEN
Spain + International	4,888	11,251	44,072	164,816

Absences due to accidents, maternity, common illness and COVID illness are taken into account. The figure is reported by hours in compliance with Law 11/2018. The system outside Spain compiles the figures in days. Given the number of agreements in force, the calculation of hours is only an estimate, establishing an average time of 8 hours/day.

\* The 2021 figure only refers to Spain. The 2022 figure is for Spain and international.



## EQUAL TREATMENT AND EQUAL OPPORTUNITIES

### Diversity and Inclusion (S1-9)

Creating an inclusive environment that ensures equal treatment and opportunities is key to fostering diversity in organisations and transforming it into results, which implies commitment, strategy, planning, resources and entities in charge of managing diversity and inclusion.

ACCIONA Energía's Diversity and Inclusion Management is the department responsible for promoting and managing the organisation's Diversity, Equity and Inclusion (DEI) strategy and reports to the Organisation, Talent and Wellbeing Department. This department is coordinated with ACCIONA's global Diversity and Inclusion area, making up the organisational structure responsible for driving the strategy, implementing, reviewing and supervising compliance with the DEI policy, promoting equity and inclusion actions and ensuring the achievement of the objectives established in the action plan.

All ACCIONA Energía employees are responsible for ensuring that the challenges established in the area of Diversity and Inclusion are met, especially in positions of responsibility and management, where they have the greatest capacity to make this inclusive environment a reality.

#### SUSTAINABLE DIFFERENCE

→ → ACCIONA IS MADE UP OF 3,099 PEOPLE

#### Diversity and local impact



#### Gender diversity



#### Generational diversity



#### Disability



ACCIONA Energía is made up of 3,099 people of 53 nationalities. All contribute to the development of skills to anticipate problems and solve them, adapt to the changes emerging in the 22 countries where the company operates and where our business model allows us to build a close relationship with our clients, stakeholders and local talent.

## Opportunities generated through diversity

The effective management of diversity and full inclusion in ACCIONA Energía requires a comprehensive approach that encompasses the identification of opportunities, risks and impacts on the company's processes. Integrating different perspectives to generate innovative ideas, making more informed and equitable decisions, attracting and retaining diverse talent, building a strong reputation for fairness and equality, accessing diverse markets and fostering a positive work climate are key elements that improve business performance.

Conflict management and the promotion of equal opportunities may require significant cultural change. However, past experience and crises have shown that meeting the challenges of sustainable development is possible through talent, commitment and leadership. ACCIONA Energía sees diversity as a source of talent that provides competitive advantages and considers equity and inclusion as priorities in people management, fundamental for promoting sustainable development, the defence of Human Rights and compliance with the 2030 Agenda.

Measuring the impact of diversity and inclusion initiatives is complex but essential to assess their effectiveness and make continuous improvements. Active participation and committed leadership are crucial to achieving an inclusive and equitable culture. ACCIONA Energía uses digital tools and monitoring and reporting systems to advance in the identification of diversity indicators and provide real-time information to managers, linked to their people management objectives. 2023 saw further progress in data quality and the identification of new indicators that enable team managers to take data-based decisions that will promote diversity and inclusion in their teams and thrive in every environment in which they operate.

To endorse our commitment to effective equal opportunities, a series of communication and awareness-raising global initiatives are carried out, giving visibility to the company's professionals and projects led by women, in recognition of their leadership and position as a role model.

## Diversity, Equity and Inclusion Policy

ACCIONA Energía's Diversity, Equity and Inclusion policy is a crucial component of the company's people management model, reinforcing commitments to the development of diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion. This policy, together with the Human Rights Policy and the Code of Conduct, guarantees real equality of opportunity and rejects any form of professional discrimination on the grounds of age, race, gender, sexual orientation, gender identity, disability, religion and political opinion, among others.

As a global company, ACCIONA Energía is aware of its impact on the local communities where it operates and works to respect and promote these values in order to generate positive impacts and contribute to the sustainable development of these communities. The company maintains an ongoing dialogue with its stakeholders to identify risks and predict future impacts related to diversity, equity and inclusion, implementing an internal control system to prevent and mitigate such risks, especially in its business activity and business relationships.

ACCIONA Energía's policy applies both to its business activity and to all its business relationships, encouraging business partners, suppliers, contractors, customers and associates to adopt these principles of diversity and inclusion. All initiatives based on this policy will be aligned with local and regional legal regulatory frameworks in the territories and countries where the company operates.

ACCIONA Energía provides specific channels of communication and complaints to its stakeholders, undertaking to offer accurate information on the principles of this policy, in addition to reviewing and improving its internal processes. The company intends to define representative diversity and inclusion targets and to establish accountability and progress monitoring mechanisms.

All these commitments and regulations are included in the Equality Plans signed by ACCIONA Energía in accordance with Organic Law 3/2007 for the effective equality of women and men. They contain an ordered set of measures, adopted after a specific diagnosis of the situation for each company, aimed at achieving equal treatment and opportunities between women and men within the organisation with the objective of eliminating discrimination on the grounds of sex.

 **More information:** [Diversity, Equity and Inclusion Policy](#)

## Diversity and Inclusion Action Plans

Since the start of the third Sustainability Master Plan for the period 2021-2025, ACCIONA Energía has evolved in its social approach, moving beyond the concept of "do no harm" as it is considered insufficient to address the social risks accumulated over decades. Instead, a focus on community development and regeneration has been adopted, actively seeking to promote the improvement of people's lives and communities.

In this regard, the company recognises that it is not enough to avoid discrimination and unfair practices, it is necessary to actively engage the whole community, work to reduce inequality gaps, promote the inclusion of minorities and develop skills and capabilities that recognise and value diversity. These actions foster inclusive participation and contribute to a deeper and more meaningful social impact.

As part of this strategy, ACCIONA Energía has deployed the following lines of work:

## 1. Awareness and development of skills in diversity, equity and inclusion

Diversity and Inclusion training, an essential component of ACCIONA Energía's Diversity, Equity and Inclusion Policy, is key to building inclusive work environments. This training provides essential tools to develop skills and behaviours that help remove barriers, promote inclusive and conscious leadership and create a work environment where diversity is a source of value.

With the aim of fostering a more inclusive culture and work environment, ACCIONA Energía develops training programmes on equality, diversity, inclusion, bias, non-discrimination and multiculturalism. These programmes are offered through a variety of training pathways designed to address these crucial issues. Since the start of the 3rd Sustainability Master Plan in 2021, a total of 14,293 hours of training have been given, of which 4,154 correspond to the 2023 financial year.

## 2. Internal Networks for Diversity and Inclusion

Through its own internal networks for Diversity and Inclusion, the company spreads good practices across the board. The internal employee networks are groups led by workers who foster a more diverse and inclusive workplace aligned with the company's mission, values, goals and objectives. One of the greatest benefits of these networks is the ability to connect people from different offices or sites, organisational groups, functions, departments and levels, helping to create a sense of community and belonging.

The Global Diversity and Inclusion Committee at ACCIONA Energía brings together the internal networks that drive good practices and connect people across businesses and countries. Their role is to escalate the global diversity and inclusion strategy and transfer it to the local reality. It is made up of groups of professionals from different countries who represent all groups and share the mission of gathering information from their environment and generating proposals and initiatives in the field of Diversity, Equity and Inclusion. While creating a sense of community and belonging, the Global Committee fosters an inclusive workplace aligned with the company's purpose, values and goals.

## DIVERSITY COMMITTEES MAP



**Women In Renewable Energy (WIRE)** is an internal network of women professionals in the company with the aim of sharing knowledge, developing skills and giving visibility to women leaders of projects, initiatives and areas in ACCIONA Energía. This year 2023 there have been 3 editions in the subjects of Sustainability, Women's Leadership and Artificial Intelligence.



**Inclusion of minorities and people at risk of social exclusion**

ACCIONA Energía does business in 22 countries and, as an employing company, is aware of the role it plays in the communities in which it operates. In accordance with its Code of Conduct and internal policies, the company is committed to respecting the rights of local communities and the people who live and work in them, in line with international human rights standards. ACCIONA Energía strives to generate positive impacts in these communities, improving the quality of life of their inhabitants. In this context, the company participates in several programmes aimed at promoting the employment of vulnerable and under-represented groups.

A total of 15 ethnic groups form part of the company's staff. In this regard, ACCIONA Energía encourages local hiring and protects minorities by complying with established frameworks (B-BBEE requirements in South Africa, traditional owners in Australia and other communities). To promote the labour inclusion of under-represented

groups, the company develops specific plans in its projects that include training, awareness-raising, elimination of barriers, employment hiring and collaboration with bodies and institutions.

In Chile, the company participates in the Ministry of Energy's "Energy + Women" programme, attending the roundtables organised in 2023 as an observer.

ACCIONA Energía holds the Distinction for Equality in the Company awarded by the Spanish Ministry of Equality.

ACCIONA Group has been recognised as a leading company in diversity by Statista and Financial Times Diversity Leaders in 2022 and 2023. The Company has also been a signatory of the Diversity Charter in Spain promoted by the European Commission.

**BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND AGE RANGE (NO. OF EMPLOYEES)**

GROUPS*	2022				2023			
	< 31	31 TO 50	> 50	TOTAL	< 31	31 TO 50	> 50	TOTAL
Executives and managers	7	429	120	556	8	483	143	634
Technical staff	284	778	79	1,141	351	877	105	1,333
Support staff	9	61	18	89	12	87	24	123
Operators	138	346	84	569	187	716	105	1,009
<b>Total employees</b>	<b>438</b>	<b>1,614</b>	<b>302</b>	<b>2,354</b>	<b>558</b>	<b>2,164</b>	<b>377</b>	<b>3,099</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

## Gender equality and equal pay for work of equal value

It is a proven fact that organisations with women's participation achieve better results. In addition, mixed teams and leadership bring different points of view to respond to challenges from an innovative perspective and can help to understand and access diverse markets. Promoting gender diversity contributes to creating a more inclusive and equitable work environment that results in a better working environment and is an opportunity to attract talent and efficiency, which undoubtedly translates into business growth.

In the energy sector, where the company operates, women are under-represented and stereotypes persist that limit opportunities, creating an unequal environment that brings with it risks such as persistent gender discrimination and resistance to change towards greater gender diversity in the sector.

Identifying and managing the impacts and risks associated with gender equality and equal pay are key to ensuring fair and inclusive work environments. The main processes addressed in the company to identify and manage them and to achieve the proposed goals are the following:

- Equal opportunities and career development by identifying possible skills and competency gaps and ensuring that all people in the company, regardless of gender, have equal career opportunities.
- Analysing the gender pay gap and assessing equity in compensation between men and women is a challenge that requires continuous efforts and monitoring.
- Training and education on bias and non-discrimination through the Global Equality Programme, available in several languages, which educates and raises awareness on the importance of gender equality and equal pay, and how to avoid bias in pay and career decisions.
- Reporting systems and mechanisms to identify and quantify risks and measure the impact of diversity initiatives. Through indicators and scorecards, diversity is included in decision-making and progress is evaluated while measuring the commitment of the organisation's people by linking diversity objectives to the company's variable remuneration.

Identifying and managing the impacts and risks associated with gender equality and equal pay are ongoing processes that require constant commitment from top management and the involvement of the entire organisation. Transparency, equity and constant monitoring are essential to ensure a fair and gender-inclusive working environment.

ACCIONA Energía has a strategy to address these processes that includes gender diversity targets in the Sustainability Master Plan 2025 and will continue to work to boost the presence of women in leadership positions in all areas of the company.

The reporting system allows the identification of critical points and opportunities for female talent development through real-time indicators. Addressing this situation is a priority issue to mitigate significant risks to the company which, if not managed, could lead to a loss of high potential female talent at all levels of the organisation. Based on data, the company develops specific programmes to promote the attraction, retention and promotion of talent in the different stages of women's professional careers.

In Spain, ACCIONA Energía has Equality Plans in accordance with Organic Law 3/2007 for effective equality between men and women, signed with the most representative trade unions and in which the results are reported and evaluated jointly every six months.

To endorse our commitment to effective equal opportunities, a series of communication and awareness-raising



initiatives are carried out, giving visibility to the company's professionals and projects led by women, in recognition of their leadership and position as a role model.

### ACCIONA Energía's strategy to achieve gender equality

ACCIONA Energía understands that managing gender equality and diversity in the company is a key priority to promote inclusive and equitable work environments. The company has a firm commitment to gender equality and since the launch of the third Sustainability Master Plan for the period 2020–2025, its strategic vision in the short and medium term has been focused on the following actions:

- Identify the associated impacts, risks and opportunities for a detailed understanding of the state of gender equality by diagnosing, analysing and monitoring gaps and identifying areas for improvement. As a result of these activities, action plans have been initiated to increase the representation of women in all areas of the company's activities aimed at closing the gender pay gap.
- Implement training and capacity building programmes on unconscious bias, non-discrimination and inclusive skills to raise awareness of the importance of gender equality and promote inclusion. In this regard, the Global Equality Programme was launched in 2020 for the entire workforce, including management.
- Establish targets and a timeframe to achieve them within the period 2021-2025 and create key indicators and metrics to measure progress in gender representation at different levels of the company and in different fields: STEM careers, promotion and hiring rates, and retention rates, among others. Significant progress has been made in the development of diversity dashboards, available to managers and company leaders, which help them make better-informed decisions based on real-time data and help them get closer to their objectives. The achievement of objectives is linked to the variable remuneration of the company's professionals.
- Encourage equal representation in leadership roles. For this, specific women's leadership programmes have been implemented, aiming to promote the attraction, retention and promotion of talent in the different stages of women's professional careers.
- Review and update internal rules, policies and processes in line with the company's Diversity, Equity and Inclusion policy to ensure equal pay and equitable development and promotion opportunities.

The commitment of top management and the involvement of all organisational levels in the management of gender equality and diversity form the basis for a long-term strategic vision on these issues. ACCIONA Energía's strategy seeks to integrate gender diversity into its business objectives, aligning it with its long-term goals and committing to support initiatives that promote gender equality, diversity and STEM vocations among girls and young women. Transparency and commitment are essential to consolidate ACCIONA Energía as a benchmark in gender equality and diversity, which is why it continues to receive recognition and certifications that ratify its efforts in this area.

ACCIONA Energía has been recognised by Equileap as one of the ten best companies in Spain in terms of gender equality.

ACCIONA Group 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. The group is also a signatory of the "Women's Empowerment Principles" of the UN Global Compact, promoting effective gender equality through work with 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 5, which aims to achieve gender equality.



## Pay gap analysis (S1-16)

In 2023, ACCIONA Energía continued to work to eliminate gender pay gap situations. For this, it has defined an action plan that includes the following actions:

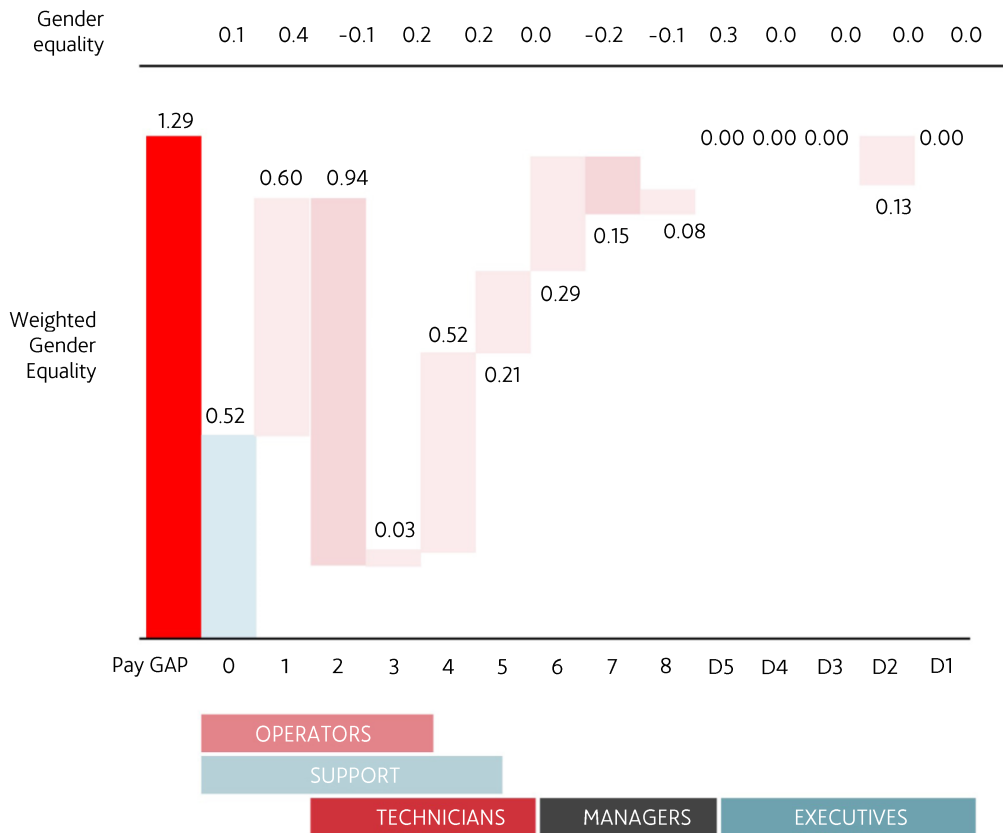
- Regular analysis of gender pay gap indicators to identify any situations of unequal pay in each country.
- Regular follow-up of the company's guidelines and management to assess the progress made in each organisational area, country and organisational level regarding potential pay gaps.

With the percentage of pay gap, the data is studied for each company, activity area and level of responsibility to define whether there is unequal pay for equal work or if the difference is due to any other cause (seniority, performance, results, etc.). The aim is to eliminate cases where inequalities are identified.

Also, through the annual salary review process, we also conduct a specific analysis of unequal pay situations every year. This action plan is periodically monitored by management, who assesses the progress being made at every level in the organisation.

These initiatives are periodically monitored by management, who assesses the progress being made at every level in the organisation.

→ GENDER EQUAL PAY ANALYSIS  
 'Equal Pay'. Data in percentages



GENDER PAY GAP EVOLUTION

2021	2022	2023
-1.8 %	1.58 %	1.29 %

In 2023, ACCIONA Energía reported a global gender pay gap of 1.29 %, improving the previous year’s data by around 0.3pp (1.58 % in 2022).

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, company, 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.

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 N.º 1081

To determine the fairness of each segment we use the following formula:

$$\text{Equal pay per segment} = \frac{(\text{average fixed salary for men} - \text{average fixed salary for women})}{\text{average fixed salary for men}}$$

To calculate the pay gap, we weight this indicator based on the weight of each group (comparison cluster).

### Promoting women's leadership and full inclusion

ACCIONA Energía promotes the full inclusion of women and their leadership. The company operates in activities that have a smaller presence of women and, therefore, it develops initiatives that aim to ensure more gender equality in the workplace.

With this in mind, it promotes an inclusive culture with behaviours that help get rid of any barriers preventing equal opportunities and is constantly reviewed, developing specific programmes to promote the attraction, retention and promotion of talent along the different stages of women's professional careers.

It is on this basis that programmes to promote women's leadership have been designed. Their main objectives are:

- Support professional development by providing the tools to help career progression.
- Create an affinity group where experiences, knowledge and learning can be shared.
- To give visibility to talent and create the basis for a pool of female talent to achieve all the objectives the company has set itself to promote gender diversity at all levels of the organisation, while accelerating cultural change in the industry.

## Programmes to boost female leadership

1. **Global programme to fast-track women with potential.** The third edition of ACCIONA's global programme was completed in 2023. The aim of the programme is to promote the development and accelerate the careers of the company's female professionals with a technical role who have been identified as having high potential. The programme has sessions on key competencies, an on-the-job action session and mentoring. The fourth edition of the programme was held in 2023, with 10 women participants. This programme is co-designed and implemented in collaboration with an external consultancy specialising in the assessment and development of management skills.
2. **IWAT (International Women Acceleration Track).** Global programme whose objective is to promote the professional careers of junior women managers who lead projects that represent the international reality of all businesses. In 2023, the first edition was completed with the participation of 5 women from 5 countries (Australia, Mexico, Brazil, USA and Spain) and the second edition has begun with the participation of 6 women from 4 countries (Australia, Poland, Croatia and Spain). It was co-designed through the strategic alliance of ACCIONA Group and Florida International University and Nebrija University.
3. **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 for a stronger and more diverse future talent pipeline; a pilot has been carried out during 2023 with the participation of a pre-management woman.
4. **PROMOCIONA Programme:** Female talent development programme designed by ESADE and aimed at female executives. 2 ACCIONA Energía executives took part in 2023.
5. **"Aprendízate" programme.** Created in Spain to develop skills and competencies, it is aimed at women with a technical profile and in 2023, 459 women from ACCIONA Energía were invited and 70 female employees enrolled in one or more of the courses offered.

## Sustainable 50:50: a programme to promote the attraction and development of female talent in projects

ACCIONA Energía's "Sustainable 50:50" projects are intended to actively promote female representation and leadership in company activity and production centres. For this, re/up-skilling policies and programmes are carried out through which the following is achieved:

1. Identify local female talent and promote it to key positions.
2. Reconvert profiles to project qualified staff and offer employment opportunities.
3. Improve female employability to bring them into key sectors of the economy.
4. Generate models replicable by other women, contributing to eliminating still persistent stereotypes regarding female presence in certain activities.
5. To visualise female references in technical positions.

### Ongoing projects

#### TECH HUB New Generation. Mexico.

A programme to create a gender-equitable technical pool (50 % women) to reinforce the team in Operation and Maintenance (O&M), with customised training and international mobility opportunities in the United States, promoting the professional development of female graduates in tech roles.

In this first call for applications, 40 participants were selected to take part in the two weeks of training, with courses on wind energy, conferences with experts and visits to wind farms.

After a thorough evaluation process of the candidates, 12 young people moved on to the on-site training and mobility phase as Maintenance Assistants. For one year, these 6 men and 6 women will follow a comprehensive training plan, both technical and in skills and competencies. During the last 3 months they will start mobility programmes to the USA.

Women in the Energía Mexico Isthmus Project. Programme for attracting, selecting and developing indigenous women in the area of Maintenance and Operation. In 2023, we run this programme for the second time and it included 6 female engineers.

Agora Energía Spain Project. Programme for the inclusion of women within the Operation and Maintenance area of the assets in identified positions, boosting the female talent pool for female maintenance operators

### Gender Inclusion Targets and Performance Metrics

The company has an Action Plan whose timeframe is part of the Sustainability Master Plan 2025, which includes measures and procedures to promote a gender-inclusive culture with behaviours that help to remove barriers and promote equal opportunities. To this end, the company's processes are constantly reviewed and specific programmes are developed to promote the attraction, loyalty and promotion of talent throughout the different stages of women's careers.

These actions are aligned with the objectives set out in the action plan:

- Increase every year the percentage of women in executive and management positions.
- Close the gender pay gap
- Promote programmes in projects and in all areas of the company's activity to increase the representation of women where they are under-represented through the Sustainable 50:50 programme.

The fulfilment of these objectives is linked to the payment of ACCIONA's bonus, so that it impacts directly on the variable remuneration of all the people in the company that benefit from it.

### FEMALE STAFF (FTE)

	2022	2023	VARIATION 2022-2023
% women in the workforce out of the total workforce	27.68 %	25.29 %	-2.39 %
% Women in executive and management positions vs. total executive and management positions	25.96 %	27.38 %	-0.01 %
• Female executives	19.18 %	20.41 %	1.23 %
• Managers	26.72 %	28.16 %	1.44 %
% Female junior managers out of total junior managers	28.46 %	29.96 %	1.50 %
% Female executives and managers in business-generating positions (Areas of production and business development)	19.47 %	21.71 %	1.52 %
% STEM women vs. total STEM staff	24.11 %	25.28 %	1.17 %
% of women in technical jobs vs. total staff in technical jobs	34 %	33.64 %	-0.36 %
% women vs. total qualified employees	31.4 %	31.6 %	0.2 %

In 2023 ACCIONA Energía promoted the inclusion of women in its workforce, ensuring the presence of at least one female CV in all its selection processes, resulting in an increase in the number of female candidates from 25.2

% in 2022 to 29.4 %, an increase of 16.7 %. This increase, coupled with the inclusion of at least one woman's CV in most recruitment processes, has helped to achieve 31 % of new hires being women by 2023.

These actions are aligned with the objectives to increase the presence of women in management and executive positions, achieve equal pay and promote women's leadership. These targets are included in the variable remuneration scheme (ACCIONA bonus). At 2023 year end, the percentage of women in executive and management positions globally was 27.38 %, calculated as average staff, 2.4 pp more than the previous year.

## Employment and inclusion of people with disabilities (S1-12)

ACCIONA Energía's strategy towards the inclusion of people with disabilities focuses on the effective integration of disability management in the workplace, marking a long-term commitment. The company has implemented work environment assessments, setting targets and monitoring systems, and promoting awareness and training to create an inclusive culture. Reasonable accommodation and policies for the recruitment, retention and promotion of people with disabilities have been developed and partnerships with specialised organisations have been established.

In the long term, 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 for the future and ensuring that its inclusion strategy is an integral part of its corporate culture.

ACCIONA Energía has been recognised for its commitment to inclusive policies through certifications such as Bequal Plus and membership in networks and organisations dedicated to the inclusion of people with disabilities in the workplace. These actions consolidate ACCIONA Energía as a benchmark in the professional projection of talent with disabilities, promoting a more inclusive society and work environment.

To this end, Acciona Energía carries out a continuous review of its processes along the following lines:

- Analysis and identification of existing barriers in the different work environments and assessment of the company's culture towards inclusion.
- Development of global training programmes on disability, workshops to raise awareness and courses on the opportunities and benefits in hiring persons with disability, focusing on identifying and eliminating behavioural barriers.
- Establishment of targets and a monitoring and evaluation system with indicators and scorecards to measure progress in terms of inclusion and adjust strategies as necessary.
- Assessment of the different roles and jobs within the company to determine the adaptations or reasonable adjustments necessary for the inclusion of people with disabilities.
- Establish inclusive recruitment practices that ensure equal opportunities for people with disabilities during the selection process, broaden sources of talent and support the integration of systems to make job vacancies more accessible to people with disabilities.
- Implementation of reasonable accommodation in the workplace with the aim of improving the experience, physical and digital accessibility so that people with disabilities can participate in the workplace on equal terms.
- Clear and transparent communication of inclusion policies, objectives and initiatives so that the whole

organisation can be involved in achieving the objectives.

## Actions implemented in 2023 in relation to inclusion

Improving accessibility is essential to ensure true inclusion of all people in the company, regardless of their physical or cognitive abilities. As well as being an act of social justice, it is also a smart business strategy that contributes to building more inclusive and sustainable societies.

In all countries where the company operates, it complies with laws and regulations requiring companies to provide accessible environments. However, in addition to the measures set out in the respective local regulations, ACCIONA Energía has adopted innovative accessibility measures that address all the new challenges related to the physical and digital experience in the work environment: from the creation of documents following standardised accessibility guidelines to the development of apps and tools with accessibility criteria within the digital environment. All these actions add value in innovation and contribute to productivity, management efficiency and autonomy, among other determining factors in the daily lives of people with and without disabilities.

The main measures implemented have been aimed at improving the accessibility of physical environments using geolocation tools. In digital environments through the development of on-boarding that is also accessible to people with intellectual disabilities using technologies such as virtual reality and augmented reality. Both projects are carried out in collaboration with the company's innovation areas.

In 2023, progress has also been made in reinforcing the accessibility of job vacancies through disability-specific job portals and the integration of employment platforms has been addressed in order to make all the company's vacancies more accessible while at the same time broadening the company's pool of diverse talent and positioning itself as a benchmark employer brand for people with disabilities.

With regard to the company's public information, for the second consecutive year, non-financial information is prepared in an accessible format, making public sustainability information reports accessible from their origin.

Furthermore, it has been shown that all the new accessibility solutions implemented benefit all its professionals, both disabled and non-disabled, fostering an inclusive work environment that not only attracts people with disabilities, but also contributes to diversity and the creation of more innovative and efficient teams.

### Programmes to ensure universal accessibility for persons with disabilities

#### ACCESSIBILITY OF PHYSICAL AND DIGITAL ENVIRONMENTS

- 1. Intelligent accessibility project.** The project consists of the development of personal smart and personalised devices for the physical environments of the ACCIONA community that, using cameras and algorithms, can create a real-time map of the environment and detect obstacles by providing audio feedback that allows visually impaired people to move safely indoors and outdoors. This pilot project is being developed at the CAMPUS ACCIONA MESENA MADRID.



**2. Digital on-boarding project for people with intellectual disabilities in collaboration with the Digital Hub innovation team.** It aims to facilitate their welcome and first steps in the company with the support of technologies such as virtual reality and augmented reality to successfully adapt to the daily dynamics of working environments. This pilot project has been launched in 2023 and is in the production phase.

The most noteworthy initiatives in 2023 in the area of recruitment of people from underrepresented groups include:

- Collaboration with the Sphere Foundation at national level through the integration of people with disabilities
- Collaboration with Prevent Foundation, on a national level through the insertion of people with disabilities.
- Bequal certified company -with Bequal Plus rating- which certifies compliance with the law and ACCIONA Energía's commitment to inclusive disability policies.
- ACCIONA Group is a member of the Ibero-American Network of Inclusive Companies (RIEI), which brings together companies and public and private entities committed to disability.
- ACCIONA Energía collaborates with the ONCE Foundation's Inserta Agreement, for the inclusion of people with disabilities in the workplace.
- Collaboration with the Integra Foundation in various initiatives that contribute to improving the employability of people with disabilities so that they can take control of their lives through inclusion in the workplace.
- DOWN Madrid: support for the inclusion of people with Down's syndrome and people with intellectual disabilities in the workplace.
- ACCIONA Energía forms part of the action group "Companies for Equality, Diversity and Inclusion" promoted by Randstad Foundation to trigger mobilisation for the integration of diversity, disability and employment.

As proof of the company's commitment to inclusion, ACCIONA Energía received the following awards in 2023:

- Randstad Foundation Award in the category of "Integration of people with disabilities in the workplace led by a large company".
- Expansion's 21st Edition Award for Innovation in Human Resources for the initiatives implemented for the inclusion of people with disabilities in the workplace.

## Objectives in the Sustainability Master Plan 2025

The Sustainability Master Plan has defined the objective of increasing the percentage of people with disability in the staff to 5 % in Spain by 2025 and to 2 % –or always above the regulatory framework– in key countries.

### EVOLUTION OF THE HIRING OF PEOPLE WITH DISABILITY

	2021	2022	2023
Percentage	3.20 %	3.62 %	3.96 %
Total number	27	36	61

The average number of people employed in Spain during the financial year 2023 by the companies included in the consolidation, with a disability greater than or equal to 33 %, amounted to 61 equivalent workers (direct employment and indirect employment)

The percentage of compliance with Royal Legislative Decree 1/2013, of 29 November, approving the Revised Text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion, which establishes that in companies with a workforce of more than 50 employees there must be a minimum of 2 % of contracts for workers with disabilities, was 3.96 % (3.62 % in 2022). 1.44 % were for direct hires, while the rest comes from contributions through purchases to Special Job Centres and donations to third sector organisations which promote inclusion of people with disabilities in the workplace.

### Programmes to boost the inclusion of people with disability in the workplace

1. **Launch of the plan "The value of disability"**, to accompany employees in the recognition of disability, providing comprehensive support to obtain the disability certificate. Scope for the entire workforce in Spain. In 2024 we plan to extend the model to other countries.
2. **"People ="** programme for young people with disabilities who have recently graduated from university where they receive specific training to develop their skills and mentoring from ACCIONA Energía employees and get their first job opportunity. In 2023, 1 professional has joined the staff in Chile. In Mexico, we have launched this programme for the second time and 4 new scholarships were incorporated.
3. **" +Diverse +Capable"** inclusive workplace programme to encourage the hiring of people with intellectual disability. Digitalisation has meant that many of the jobs they were doing no longer exist, but this also brings new opportunities.

## PERFORMANCE STATUS (S1-13)

ACCIONA ENERGÍA's Talent function establishes the company's Performance Status process. This area works with a global scope and ensures the correct fulfilment of the process in time and quality. Adequate coordination between this function and the specialised Human Resources departments in each country (HRBP - Human Resources Business Partner) is essential.

This ensures that the performance and potential assessment process is rigorous and tailored to the reality of each business and country, and to the company's key talent management milestones.

### Merit recognition

Recognition is an essential pillar of ACCIONA Energía's PEOPLE strategy, underlining the importance of each employee's contribution to the company's purpose. The aim is twofold: to promote recognition that links professional growth with the employee's contribution to the achievement of business goals, and to reward proactivity in contributing to these goals.

To achieve this, ACCIONA Energía has developed a talent management methodology based on objectives, values and behaviours. This facilitates the identification and recognition of those whose performance and skills drive the achievement of goals and add value.

The performance measurement process within the company is key to ensuring operational effectiveness, continuous professional development and adaptability to a constantly changing business environment. ACCIONA Energía's methodology focuses on setting both individual and collective goals, allowing not only to work autonomously but also to align work by team, area, department and, ultimately, as an organisation. Continuous dialogue between managers and teams is encouraged for effective monitoring.

This methodology is complemented by an annual performance appraisal process for professionals, involving the chain of command, which brings homogeneity to the process throughout the organisation. This measures both performance and the potential to take on greater responsibilities, linking with the recognition system to promote meritocracy and career development.

The evaluations are based on a talent management model based on Development Talks, recurring dialogues between the Manager and each of his/her employees, addressing aspects such as team well-being, professional aspirations, goals, personal development plans and international mobility opportunities.

### EMPLOYEES SUBJECT TO THE PERFORMANCE STATUS PROCESS BY GENDER AND PROFESSIONAL CATEGORY

	WOMEN	MEN	TOTAL
Executives and Managers	26.53 %	73.47 %	21.36 %
Technical staff	33.99 %	66.01 %	42.42 %
Support staff	91.38 %	8.62 %	3.89 %
Operators	5.81 %	94.19 %	32.33 %

### Talent development and promotion

ACCIONA Energía's people management model is supplemented by policies and initiatives designed to optimise employee performance, enhance their career advancement and manage objective target-based compensation. In particular, the Role Inventory and the Competence Handbook guide the expected behaviour for each function and professional role, as well as offering a vision of the career plan for each of them.

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 development of professionals in the company. These programmes have a global and transversal geographical scope in all categories or roles of the organisation and are carried out in collaboration with internationally renowned university and business schools.

The corporate programmes that the ACCIONA Group has implemented during 2023 and in which ACCIONA Energía has participated are as follows:

- **Technician II Programme:** this programme aims to work on the key skills expected at the first levels of the organisational structure and is delivered in collaboration with ESADE business school. The programme begins with a competency test that allows participants to find out their level of development in the key skills expected for their role, which will then be worked on in a personalised itinerary of the six defined competencies. Investing in the development of our technical staff not only enhances their current performance, but also allows us to work on the future challenges they will face in their professional career. In 2023, the III Edition of the programme was launched, in which a total of 14 ACCIONA Energía professionals from Australia, Spain and the United States participated, enriching the multiculturalism and networking network in the company.
- **Career Acceleration Programme:** aims to promote the development and professional career of those women in the role of Technician III (level 4) who, in a sustained manner over time, reflect outstanding performance and potential. As part of ACCIONA's PEOPLE strategy, it is essential to focus on diversity and, specifically, on female talent. To further ensure the development of future leaders, it is vital to train the key skills that will be required in these positions and to facilitate their positioning in the organisation. 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 are then put into practice in work sessions, individual interviews, an action plan and a voluntary mentoring process. The IV Edition of the programme was launched in 2023, in which a total of 10 ACCIONA Energía professionals participated, with representation from six different countries (Australia, Spain, Mexico, Portugal, Singapore and South Africa).

In addition, with a specific scope for ACCIONA Energía, the following programmes and initiatives have been developed in 2023:

- **Youth Committee.** ACCIONA Energía has launched the first edition of the Youth Committee, in which a total of 12 young people, considered to have high potential, represent the members of the current ACCIONA Energía Committee at a global level.

This new initiative seeks to give visibility to the Young Talent group, providing the business with an innovative and up-to-date perspective on the trends and preferences of the new generations. The aim is to encourage diversity of thought by incorporating a wider range of perspectives into strategic decision-making.

This committee not only strengthens the connection between leaders and young employees (our future leaders), but also promotes an inclusive and responsive environment, essential for the long-term sustainability and growth of the organisation in a constantly evolving context and industry.

- **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. This provides managers with 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 executives, 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 Program** (14 participants. one session per week, for a total of five weeks). The audience is made up 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 Program** (19 participants. one session per month, for a total duration of six 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, the aim is 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 Program** (12 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

## ACCIONA ENERGÍA LEADERSHIP

Leadership is a fundamental basis of ACCIONA Energía's PEOPLE strategy. It enables the company to develop leaders who are prepared and aligned with the business objectives and purpose of the organisation, valuing the diversity of the teams. The company approaches leadership from a mission driven perspective, empowering people to innovate, promote initiatives, encourage and recognise the importance of diversity and inclusion. This enables the deployment of an inclusive model that leverages diverse talent, through initiatives that promote and recognise behaviours aligned with the company's commitments and policies.

### Knowledge management

ACCIONA Energía's Talent function establishes ACCIONA Energía's transversal training processes and projects. This area works with a global scope and ensures the correct compliance of processes and programmes in time and quality. Adequate coordination between this function and the specialised Human Resources departments in each country (HRBP - Human Resources Business Partner) is essential.

This ensures that training processes and projects are carried out rigorously, and are adapted to the reality of each business and country, and to the company's key talent management milestones.

### Training needs assessment

This process involves identifying specific training and competence development needs for the workforce, 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 2023, 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 ACCIONA Energía's overall success.

In addition, processes such as the **annual review of objectives**, or the **performance status process**, can encourage the manager and employee to have development conversations related to training.

Training programmes are structured in training pathways, integrating skills and know-how throughout the different phases of employee development, starting with an on-boarding process

**On-boarding:** The on-boarding process of new employees helps 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.

## ACCIONA University

ACCIONA University is an internal institution within the framework of the PEOPLE strategy to foster cutting-edge learning that is dedicated to the continuous training and development of the entire ACCIONA team with global reach within the organisation. The university is structured into five main schools:

### Business School

ACCIONA University, in its commitment to the continuous training and development of its global staff and the implementation of circularity in its programmes, has transformed its Business School programmes into online and

hybrid formats, including:

- **iGEP, International Global Executive Program:** aims to share knowledge with internal and external experts and to reflect on business influence and leadership. Four ACCIONA Energía executives have started the second edition of the programme, created in conjunction with IE Business School - Financial Times and ACCIONA.
- **iMPA, International Master's Degree in Project Administration:** a global master's degree in collaboration with the Universidad Politécnica de Madrid (UPM) and an international consortium of universities such as Stuttgart, Berkeley, NTNU, Universidade de Sao Paulo and Tech Monterrey. It is focused on boosting the career of project leaders in a UPM postgraduate university degree, consolidating their role and providing them with the tools to develop project management skills in the company's countries and businesses. Two ACCIONA Energía managers (50:50 gender balance) from Spain and Chile participated in the 2023 edition.

## Focused Programs

This school is directed through its programmes focused on covering the training needs of the different stages of professional careers, where one of the basic pillars is to promote ACCIONA values such as Sustainability, Innovation and Equality, Diversity and Inclusion in all programmes.

- **iWAT, International Women Acceleration Track:** the goal of this global programme is to advance the career of these professionals representing the international reality of all the businesses. Through a strategic alliance, this was jointly designed by ACCIONA, the Florida International University and the Nebrija University. A total of six ACCIONA Energía women from Spain, Australia, Croatia and Poland have taken part in the third edition, to be deployed in 2023.
- **iMBA, International Master in Business Administration:** programme jointly designed by the School for Industrial Organisation (EOI) and ACCIONA to supply our managers with cross-section business tools. This 11th edition has the participation of the Alliance Manchester Business School - The University of Manchester. A total of eight ACCIONA Energía managers took part in the 2023 edition in Spain, Chile and Mexico.
- **iXPA, International Specialisation Programme in Project Administration:** programme designed jointly with the Polytechnic University of Madrid (UPM) and ACCIONA to develop future Project Leaders, consolidating their leadership role and providing them with tools to develop project management skills. A total of five ACCIONA Energía employees took part in this edition in Spain, Chile and Mexico, 40 % of whom were women.

## Technical Academies

ACCIONA University's academies are an integral part of its training model and have a clear mission to develop employees in key competencies within technical areas and/or critical functions to improve their performance.

The academies adopt an agile model of learning that is both structured and scalable. The model focuses on technical training, but also incorporates elements of hybrid learning and new ways of learning. This means that employees can benefit from a variety of teaching and learning methods, from classroom training to e-learning and on-the-job training.

A unique aspect of the Academies is their focus on collaboration and the involvement of company experts from all businesses and countries. This allows employees to learn from the best in their field and benefit from a wide range of perspectives and experiences. At the same time, it also fosters a culture of continuous learning and



development throughout the organisation.

ACCIONA Academies are designed to provide employees with the skills and knowledge they need to succeed in their roles, while promoting a culture of continuous learning and development. With their focus on technical training, hybrid learning and the involvement of experts from across the company, these academies are at the forefront of technical training.

#### - *O&M Academy program*

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.

To this end, 77 employees have been selected and divided into 10 working groups, each with a business challenge and an assigned tutor, who will guide and orient them in this experience.

The content of this programme is structured around three main pillars:

- **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).
- **A solid theoretical basis:** master sessions for the 77 participants, specialised in four key skills in their role, together with the Instituto de Empresa (IE) that will help them face new challenges such as innovation, results orientation, multicultural and multidisciplinary teamwork and cross-cutting projects.
- **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

These programmes or courses are open to all employees, regardless of function or location, and offer a wide range of courses in a variety of areas. These are all open programmes and courses that allow employees to expand their knowledge and skills beyond their area of specialisation.

The Open Programs are made up of a variety of courses that address key areas for the personal and professional growth of our employees. They are based on core competencies for all employees, covering the following broad themes: technical and specialist skills, innovation and digital transformation, equality, diversity and inclusion, health and wellbeing, technological efficiency, positivity, authentic leadership, results orientation, teamwork and diversity, optimised productivity, creative thinking and language school.

All these courses are designed to be engaging and interactive, allowing employees to learn at their own pace and according to their individual needs.



## Mandatory Programmes

These Programmes comprise the mandatory training that all ACCIONA Energía employees must be familiar with and cover the following subjects: Code of Conduct, Compliance, Equality, Diversity and Inclusion, Legal, Health and Safety, Sustainability and Information Security. They are taught in Spanish, English and Brazilian Portuguese, and there is a special monitoring system to ensure that they are completed by all employees in accordance with the legal regulations in each country and ACCIONA Energía's policies.

In all these programmes, ACCIONA University is committed to providing high quality training that is aligned with the needs of the business and promotes the professional growth and development of its staff. The quality, effectiveness and learning impact of these programmes is regularly assessed to ensure that they meet the company's training and development objectives.

## Faculty

All ACCIONA University programmes have high standards of quality that apply to both the content of the training provided and the teaching staff involved. The training offered by the university in all its programmes is designed to provide employees with the skills and knowledge necessary to succeed in their professional roles and performance. Training programmes are aligned with business needs and are regularly updated to reflect the latest trends and developments in each field.

In terms of internal teaching staff, ACCIONA University draws on a team of highly qualified and experienced professionals in their respective areas of knowledge. These professors bring a rich mix of academic knowledge and practical experience, enabling employees to learn from the best in their field.

The quality of training and external faculty is also a priority for ACCIONA University. Regular evaluations are therefore carried out to ensure that high quality standards are maintained. This ensures that the university continues to offer exceptional training that benefits both employees and the company as a whole.

## PILOT TRAINING IN PUBLIC SPEAKING AND INFLUENCING SKILLS WITH ARTIFICIAL INTELLIGENCE AND VIRTUAL REALITY.

In June 2023, ACCIONA Energía implemented a new pilot training programme in communication and influencing skills for 10 executives globally and with the help of Be Chiara, a Virtual Learning training company whose methodology is based on virtual reality and artificial intelligence.

From mid/late June until July, participants had to complete a six-module training in different communication skills, using virtual reality goggles, and with an Artificial Intelligence-based feedback methodology. In this way, each participant has developed these skills by facing different very real day-to-day situations/scenarios provided by technology.

**Metrics:** the participants were 10 ACCIONA Energía executives from Spain, Australia, USA, Mexico, Chile, and Australia. 8 of these ten managers completed the training in its entirety.

### ACCIONA University Training Centre

ACCIONA University, committed to the continuous training and development of its global workforce, has taken another step forward in its mission to provide high quality education. The university has recently inaugurated a new Training Centre as part of the ACCIONA Campus, which is at the cutting edge of technology and innovation.

This Training Centre is a modern and technologically advanced learning space. It is equipped with the latest digital learning technologies and offers an interactive and collaborative learning environment. The centre is designed to foster innovation and creativity, and provides employees with the tools and resources they need to keep up with the latest trends and developments in their field

The new Training Centre reinforces ACCIONA's commitment to excellence in training and development by providing employees with access to state-of-the-art training facilities. The university is helping to prepare its staff for the challenges of the future and to keep ACCIONA at the forefront of its sector.

Furthermore, this new centre is aligned with the Sustainability Master Plan, taking into account sustainable regeneration and the search for a net positive impact within the Business Projects developed in its main focused programmes. The lines of action of these projects are based on circularity, decarbonisation and/or new business models under these premises.

In addition, and as part of ACCIONA University, the company has defined specific programmes structured in five "Schools", developed with prestigious academic institutions.

## ACCIONA's Institute of Technology

As a result of its commitment to continue producing and boosting its positive impact on society, ACCIONA has launched an action plan to train non-employees, to identify, design, execute and scale learning solutions that will boost employability and improve the quality of life among different groups, especially those in risk of social exclusion, in every territory where ACCIONA operates.

ACCIONA wishes to contribute value and provide business units with the tools required to step up its actions with a social impact on the communities where the company deploys its projects.

In 2023, more than 30,000 hours of training were given to non-employee groups in all countries where ACCIONA operates in order to promote the employability of young talent, female talent, senior talent, minority groups and local communities.

### TRAINING IN THE PREVENTION OF HARASSMENT AT WORK:

At ACCIONA ENERGÍA we recognise the importance of maintaining a safe and respectful working environment. Harassment in the workplace is a highly relevant issue and its prevention is fundamental to maintaining a culture of mutual respect, diversity and inclusion.

That is why, in the last quarter of 2023, the talent function develops and implements a new online and mandatory anti-harassment training for ACCIONA ENERGÍA Spain employees. This training lasted 45 minutes and was carried out in cooperation with the company "Wessual".

With the implementation of this new training, we aim to equip our employees with the necessary tools to identify, address and prevent harassment in the workplace.

The anti-harassment campaign that announced this mandatory training lasted for two months, and has been included in the onboarding of all new employees joining the organisation.

**Metrics:** a total of 1548 employees received this training, of which:

- 79.72 % have completed it
- 20.28 % have not yet completed it

The average satisfaction of employees when evaluating this training is 4.35 out of 5.

**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 training programmes to ensure that they are aligned with organisational objectives and contribute to employee development by assessing two key indicators:

- Impact on employee performance
- Impact on business results

## Training Objectives and Metrics

ACCIONA ENERGÍA has a commitment to maintain an annual KPI of 40 hours of training per employee in Spain, and 30 hours of training per employee in the rest of the countries in which it operates.

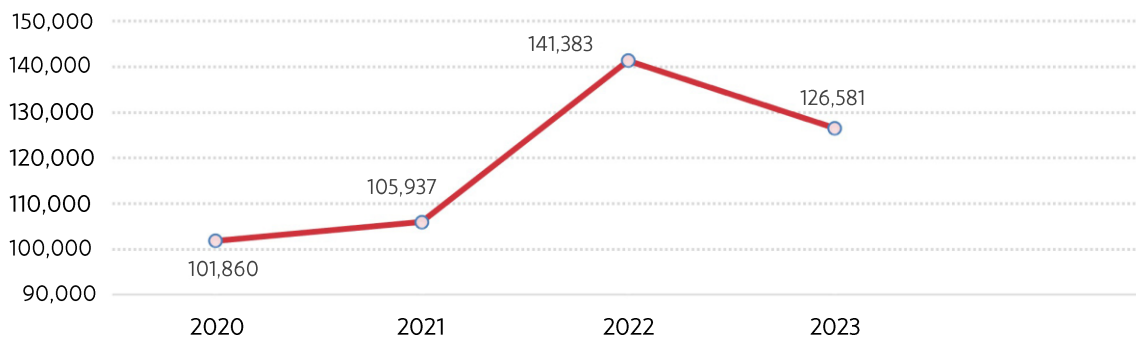
This fosters a culture of continuous learning, improving retention through training, and strengthening the organisation's competitiveness in a constantly evolving work environment.

### TRAINING RECEIVED BY JOB CLASSIFICATION AND GENDER

TRAINING*		EXECUTIVES AND MANAGERS	TECHNICAL STAFF	SUPPORT STAFF	OPERATORS	TOTAL
Total number of hours received	Men	22,639	38,106	433	31,871	93,049
	Women	10,130	18,235	1,919	3,247	33,532
	<b>Total</b>	<b>32,770</b>	<b>56,341</b>	<b>2,352</b>	<b>35,118</b>	<b>126,581</b>
Students	Men	491	940	9	998	2,403
	Women	182	478	104	113	868
	<b>Total</b>	<b>673</b>	<b>1,418</b>	<b>113</b>	<b>1,111</b>	<b>3,271</b>
Training hours per employee/year	Men	49.17	43.06	31.36	33.34	40.19
	Women	58.34	40.65	17.62	61.58	42.78
	<b>Total</b>	<b>51.68</b>	<b>42.25</b>	<b>19.17</b>	<b>34.81</b>	<b>40.85</b>

\* The calculation methodology might use figures with decimals that are subsequently rounded off

### EVOLUTION OF THE TRAINING RECEIVED BY ACCIONA ENERGÍA EMPLOYEES (HOURS)



INVESTMENT IN TRAINING IN ACCIONA ENERGÍA (EUROS)

	EXECUTIVES AND MANAGERS	TECHNICIANS	SUPPORT	WORKERS	TOTAL
Total investment	€1.617.422	€1.930.231	€92.408	€1.208.152	€4.848.212
Investment per employee/year	€2.550.92	€1.447.53	€753.15	€1.197.68	€1.564.46

ACCESS TO RIGHTS

Responsibility for human rights risk management and compliance rests with the Board of Directors, which, through the Human Rights Policy, other Social Sphere Policies, and the Due Diligence strategy, drives the identification, prevention, mitigation and accountability of relevant risks and opportunities.

ACCIONA Energía shapes its strategy on the basis of international and European human rights instruments and conventions, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work and ILO Conventions, the UN Convention on People with Disabilities, the European Convention on Human Rights, the revised European Social Charter, the Charter of Fundamental Rights of the European Union, the EU policy priorities set by the European Pillar of Social Rights and EU legislation, including the *acquis communautaire* on labour law.

Respect for human rights

The Business Principles and Principles of Ethical Conduct of ACCIONA Energía’s Code of Conduct establish a commitment to respect internationally recognised human rights and civil liberties. All ACCIONA Energía people must take on this commitment, performing their professional duties in a spirit of respect for human rights and public liberties.

The Human Rights Policy expresses the same commitment and establishes the principles of responsible business conduct in all ACCIONA Energía companies, including subsidiaries and companies, in all geographical areas where it is present, as well as promoting the adoption of these principles in those companies in which it participates - even without having control- and also among its suppliers, contractors and collaborators.

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, sub-contractors, recruitment agencies, associates, partners, competitors, customers, local communities, and society in general.

ACCIONA Energía respects and contributes to the protection of human rights pursuant to the International Human Rights Charter; the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work and its fundamental conventions; the Workers' Representatives Convention; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; the United Nations Guiding Principles on Business and Human Rights; the Principles of the UN Global Compact; the UN Convention on the Rights of the Child; the Seoul Declaration on Safety and Health at Work.

## HUMAN RIGHTS POLICY

The material issues covered by the policy are as follows:

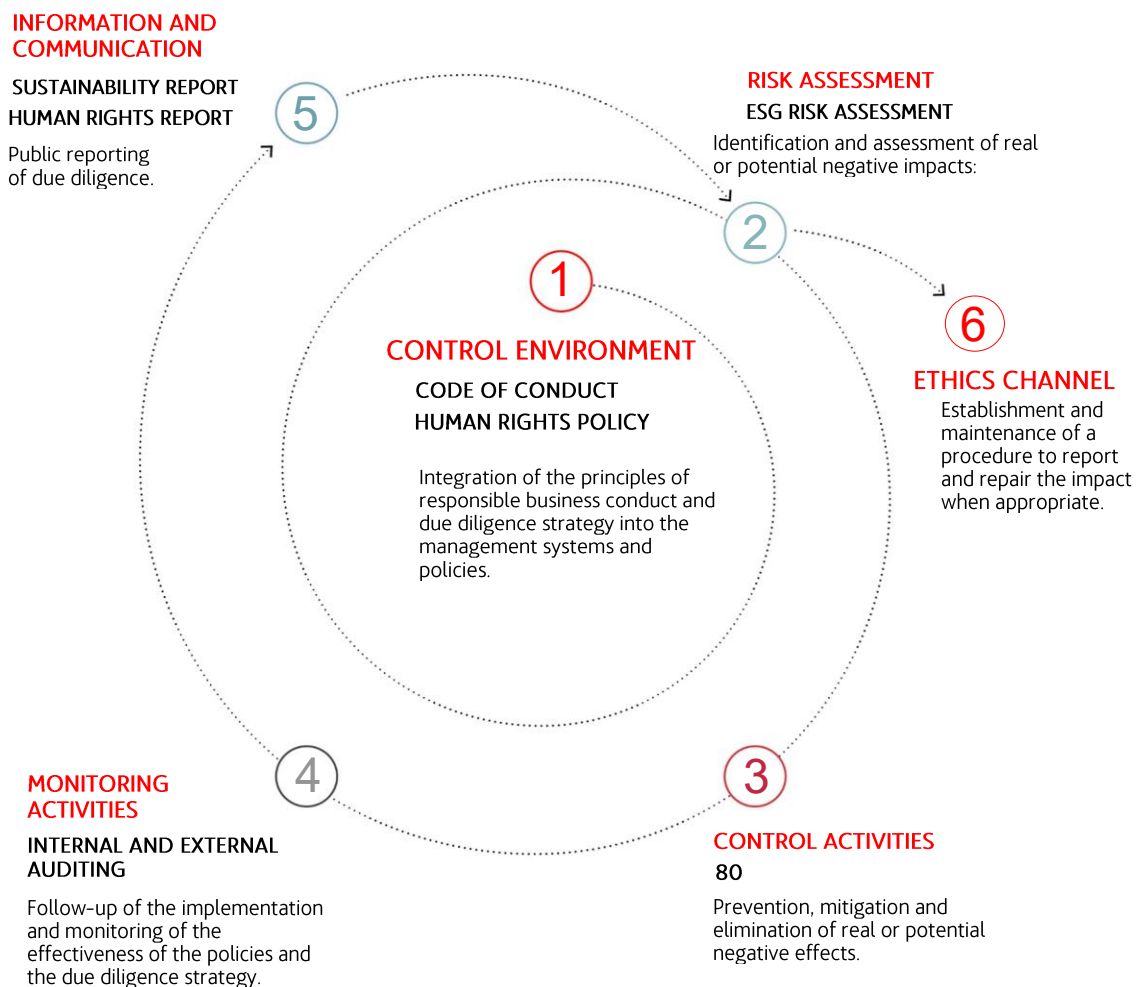
- Zero tolerance for discrimination, violence and harassment in the workplace.
- Prohibition of child labour, forced labour, modern slavery and human trafficking.
- Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence.
- Safe and healthy working conditions.
- Ethical, just and fair conditions of employment and occupation -adequate wages and equal pay for work of equal value-.
- Diversity and inclusion.
- Right to privacy.
- Respect for the human rights of communities, including the rights of indigenous and tribal peoples.
- Training and capacity building.

The Human Rights Policy also integrates the due diligence strategy, whereby the company is committed to identify, assess, prevent, mitigate, minimise, address, eliminate, monitor, remedy and report actual or potential adverse human rights impacts of its business activities and relationships. This process includes detecting and assessing actual or potential adverse effects, preventing and mitigating them, maintaining a complaints procedure, monitoring the effectiveness of the due diligence policy and strategy, and communicating publicly about the company's due diligence.

## Due diligence in human rights matters

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

→ INTERNAL CONTROL SYSTEM FOR SOCIAL SAFEGUARDS ICSSS



## Identification and assessment of real or potential negative effects

The detection of real or potential negative impacts on human rights is carried out on a yearly basis under the non-financial risk analysis.

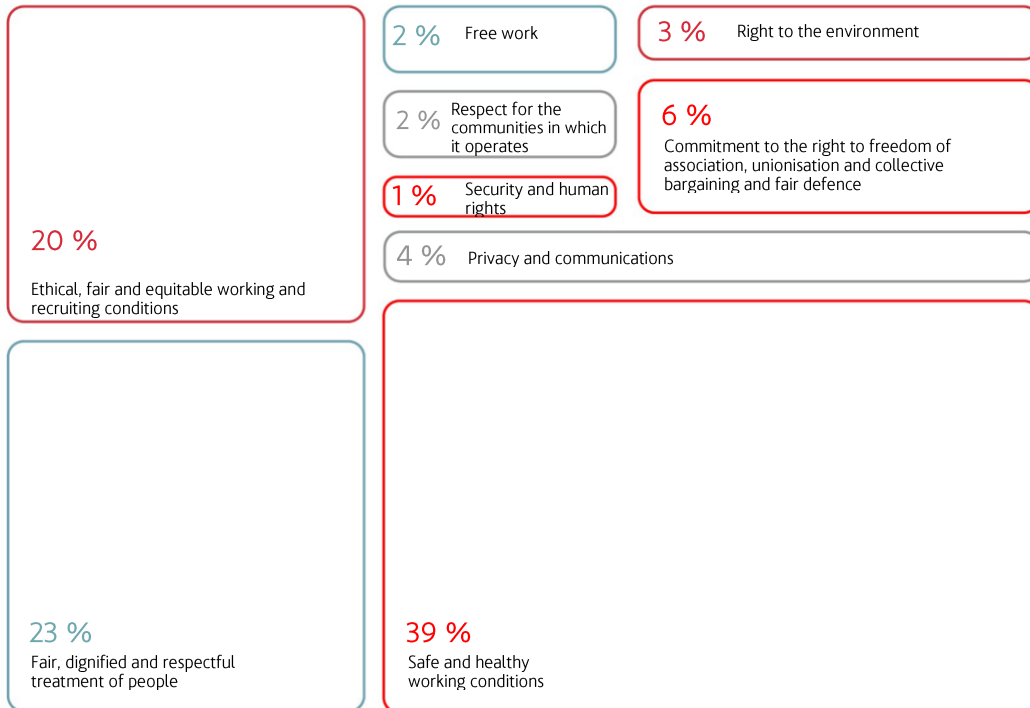
The identification and assessment of risks has been strengthened in 2023 through the revision and inclusion of new indicators related to migrant workers' rights and the right to the environment, bringing the total number of indicators to 22, including:

<b>Fair, dignified and respectful treatment of people</b>	Discrimination in the workplace Freedom of opinion and expression Minority rights Sexual minorities Rights of women and girls
<b>Free work</b>	Child labour Forced labour Migrant workers Modern slavery Trafficking in persons Young workers
<b>Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence</b>	Freedom of assembly Freedom of association and collective bargaining
<b>Safe and healthy working conditions</b>	Health and safety in the workplace
<b>Ethical, fair and equitable working and recruiting conditions</b>	Living wages Decent working hours
<b>Privacy and communications</b>	Right to privacy
<b>Respect for the communities in which it operates</b>	Rights of indigenous peoples Land, property and housing rights
<b>Security and human rights</b>	Security and human rights
<b>Respect for the environment</b>	Climate change vulnerability Vulnerability to natural hazards

ACCIONA Energía's approximately 340 facilities have been assessed on the basis of their geolocation, the probability 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.



The distribution of the average risk and the variables analysed is as follows:



## Prevention and mitigation of real or potential negative impacts

The system for Internal Control of Social Safeguards is composed of 80 control activities. The control activities are the actions resulting from the policies, standards and procedures to defend the principles that establish what is a responsible business conduct. Each risk event identified is associated to internal controls that prevent and mitigate the likelihood of a risk materialising. The Social Safeguards Internal Control System documents these internal controls, with a series of attributes characterising them, amongst others the specific description of the control activity, the area or management unit responsible for performing them and the evidence that demonstrates the control is being performed properly.

The Social Safeguards Internal Control System includes control measures belonging to other Control Systems such as the Organisation and Management Model for Crime Prevention and Anti-Corruption, which aim to prevent the commission of certain risks included in the scope of the Social Safeguards Internal Control System.

The updating of risks and controls is carried out annually by the Sustainability Department after the annual monitoring process performed by the Internal Audit Department.

## Monitoring of the effectiveness of the policy and the due diligence strategy

### Internal audit

Monitoring of the functioning of the Social Safeguards Internal Control System is carried out by the Audit and Sustainability Committee, as the body delegated by the Board of Directors, which entrusts the Internal Audit Department with the monitoring of the functioning and effectiveness of the controls established to prevent and mitigate negative effects on human rights as part of the company's internal control systems.

The supervision of the system is done through the corporate ACCIONA-RMS Risk Management application, where the persons in charge of the controls confirm the validity, design and effectiveness of the internal controls under their area of responsibility, as well as the suitability of their functioning; and, if appropriate, they will show any breach, partial compliance or the needs to adapt the control to the operating reality. Additionally, for a representative sample of controls, the person in charge of control provides proof of their compliance.

Once the internal monitoring procedures of the Social Safeguards Internal Control System have been completed, reports are prepared reflecting the results, improvement recommendations and action plans proposed. The Sustainability Management coordinates the correction of non-compliances or recommendations for improvement identified during the monitoring process.

The Internal Auditing Department reports to the Audit and Sustainability Committee of on the scope and outcome of the supervision made carried out on the Social Safeguards Internal Control System. In 2023, it was concluded that the Internal Control System for Social Safeguards had been correctly implemented in the company.

### External audit

Supervision of the functioning of the Social Safeguards Internal Control System is additionally carried out through independent third-party on-site audits of the company's projects, services and activities. The scope of the audits also 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 Organisation (ILO), among other international reference standards. The audits, in 2023, have included interviews with own staff in relation to the audited aspects.

In 2023, 2 audits were carried out: at the Bannur wind farm, the largest wind farm built and operated by ACCIONA Energía in India; and at the San Juan de Marcona wind farm, ACCIONA Energía's first wind farm in Peru.

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.

### Remedies

ACCIONA Energía is committed to establishing legitimate and effective mechanisms for the remediation of adverse human rights impacts.

## Communication

ACCIONA Energía publicly discloses its due diligence strategy, as well as serious adverse human rights impacts, if any, in the Statement of Non-Financial Information and other reports.

## Promotion and training

ACCIONA Energía has a special Human Rights course in collaboration with the Spanish Global Compact Network and it was made available to the company's employees and suppliers. In addition, on the occasion of the 75th anniversary of the Universal Declaration of Human Rights, an internal communication campaign on the importance of human rights in the company has been carried out.

## S2 Value chain workers

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 of its value chain. The company is committed to identifying, assessing, preventing, mitigating, minimising, addressing, eliminating, monitoring, remediating and communicating actual or potential adverse human rights impacts of its business activities.

ACCIONA Energía shapes its strategy on the basis of the international reference standards in relation to human rights and integrates a due diligence strategy in accordance with these standards into its management systems.

### **Policies relating to value chain workers (S2-1)**

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 main objective with its suppliers, contractors and collaborators of any type of company, whether they are companies, partnerships, Temporary Union of Companies, joint ventures, among others, but not limited to these, is to establish commercial relations based on regulatory compliance and international standards of reference.

The Ethical Principles for Suppliers, Contractors and Partners include specific principles of behaviour aligned with internationally recognised 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 Organisation (ILO) Declaration. ACCIONA Energía, through its adherence to the Global Compact, also transfers its commitment to the 10 principles to its Suppliers, Contractors and Collaborators.

## Principles of conduct contained in the Ethical Principles for Suppliers, Contractors and Partners

- 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



Available at: <https://mediacdn.acciona.com/media/mcjehtpq/principios-eticos-esp%C3%B1ol-ingles.pdf>

The dissemination of these Ethical Principles is done through the responsible self-declaration to be completed by any supplier, contractor or collaborator, which includes their confirmation of acceptance and commitment to comply with the Code of Conduct and the Ethical Principles. These principles are also available on the Supplier Portal.

### Remediation processes and channels for value chain workers to raise concerns (S2-3)

ACCIONA Energía maintains a firm commitment to the development of its projects, services and activities following the best national and international practices, extending this commitment to all workers within its value chain. The company has an Ethics Channel, an internal information system designed so that workers in the value chain can report any irregularity, non-compliance or behaviour contrary to the legal framework in force, the Code of Conduct and/or ACCIONA Energía's ethical values.



Information: [Ethics Channel](#)

## Actions undertaken to ensure social safeguards and workers' rights in the value chain (S2-4)

Since 2022, ACCIONA Energía has been incorporating GoSupply as a platform for validating and calculating the risk map of all suppliers regardless of their level of contracting, so that knowledge of the supply chain is much broader in different areas and, especially in ESG. In 2023, having verified that this system improves the control of the supply chain with respect to those previously mentioned, the countries in which ACCIONA Energía operates and in which its implementation was pending have been incorporated into this platform, achieving the global consolidation of the system.

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 a policy, detecting actual or potential adverse effects, preventing and mitigating potential adverse effects, and eliminating actual adverse effects.

### Statement of Compliance

Through the PROCURE-e portal and tendering tool, as well as in the general contracting clauses, all suppliers must accept and commit to comply with the Ethical Principles for Suppliers, Contractors and Partners.

### Risk Map

The risk map is ACCIONA's tool to identify, assess and manage supply chain risk management.

ACCIONA Energía has the GoSupply external platform, which is international in scope and specialises in the management of risks associated with the supply chain, and which complies with international standards. It applies the different parameters to understand the overall risk of the supplier, collecting 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 know the compliance in the analysed matters. The scores that form part of the risk map according to the supplier's strategic level are the following: financial, compliance, cybersecurity (if applicable), ESG, operational and geopolitical.

### Validation

According to the outcome of the risk mapping, critical suppliers with a high social risk due to cumulative procurement volume are subject to enhanced due diligence, the outcome of which will be verified in the audit process. During the accreditation process, suppliers must complete a self-assessment questionnaire regarding compliance with international human rights benchmarks.

For suppliers included in GoSupply, the questionnaire refers to compliance with international human rights standards, such as: Equal rights and equal treatment of workers, Forced labour, Child labour, Working time and remuneration, Freedom of association and collective bargaining, Health and safety and Other fundamental rights.

HUMAN AND LABOUR RIGHTS	INTERNATIONAL LABOUR ORGANISATION (ILO) CONVENTIONS
Equal rights and equal treatment of workers	Discrimination (Employment and Occupation) Convention
Forced labour	Forced Labour Convention Abolition of Forced Labour Convention
Child labour	Abolition of Forced Labour Convention Minimum Age Convention
Working time and remuneration	Conventions related to working time and remuneration
Freedom of association and collective bargaining	Convention on Freedom of Association and Protection of the Right to Organise Right to organise and collective bargaining Convention
Health and safety	Occupational health and safety Convention
Other fundamental rights	International Covenant on Civil and Political Rights

All suppliers, regardless of their procurement volume, must complete the same human rights assessment.

### Real-time monitoring

ACCIONA Energía monitors its suppliers in real time through alerts for any human rights issues. For all suppliers included in GoSupply, real-time monitoring is automatically activated in public sources and Adverse Media, where human rights and other alerts are received and considered. In case an alert is received about a supplier, it impacts on the supplier's scoring and a corresponding action plan will be implemented with the supplier.

### Audits

Critical suppliers that, according to their country of origin, present a high social risk must be audited in order to be approved.

During 2023, a total of 95 audits have been carried out, 83 of them to direct suppliers and 12 to Tier 2, where it has been detected that 33 % have had serious NCGs, of which only 2 suppliers have NCGs related to human rights being resolved by one supplier, and the other one being in the process of being resolved.

## NO-GO POLICIES

These refer to a set of minimum criteria established by ACCIONA which, if not met by a supplier, means that the supplier in question will not be contracted. These are non-compliance with the United Nations Global Compact and the company's minimum standards related to human rights, specifically the Ethical Principles for Suppliers, Contractors and Partners and/or the Standard on Migrant Workers Welfare verified through the Supply Chain Audit Protocol.

⊕ For more information, see the chapter Sustainable Supply Chain

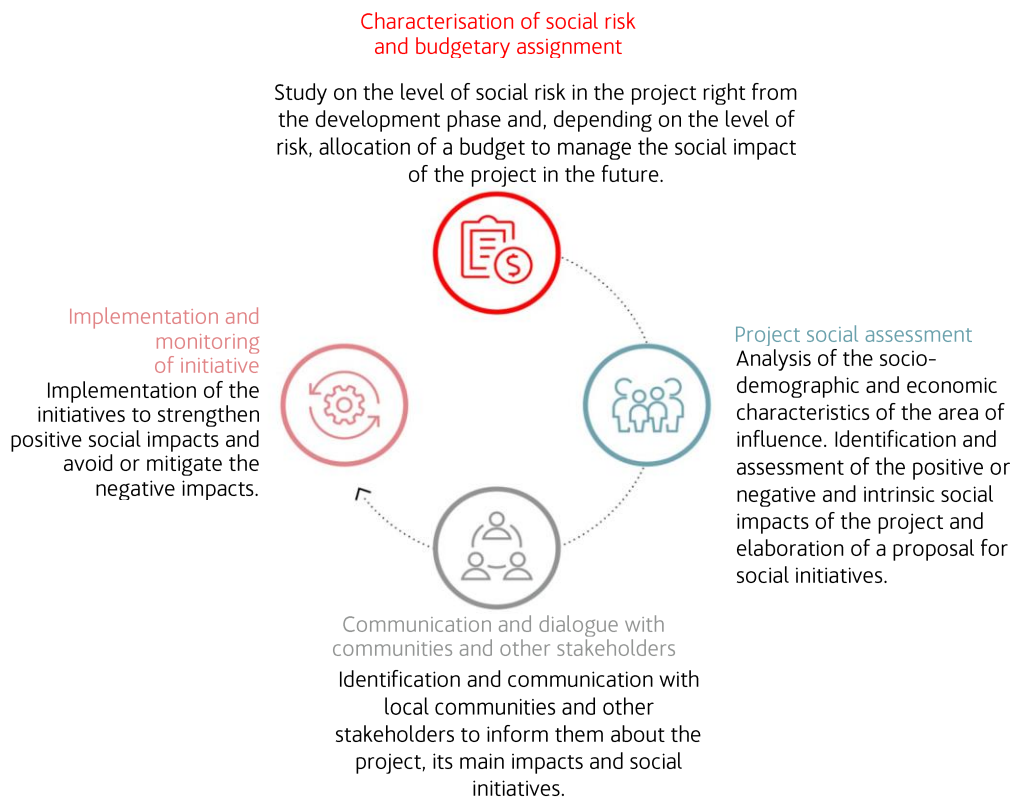


## S3 Affected Communities

ACCIONA Energía recognises that communities in the area of influence of its projects and services may be affected by the company's activities, especially vulnerable groups. The company considers social impact management a strategic issue within its sustainable business model.

ACCIONA Energía has had a Social Impact Management methodology in place for more than ten years, which allows for the identification, analysis and management of the social consequences, whether intended or unintended, both negative and positive, derived from the development of a project in a community, as well as the management of the relationship with local communities and other stakeholders.

### SOCIAL IMPACT MANAGEMENT (SIM) METHODOLOGY



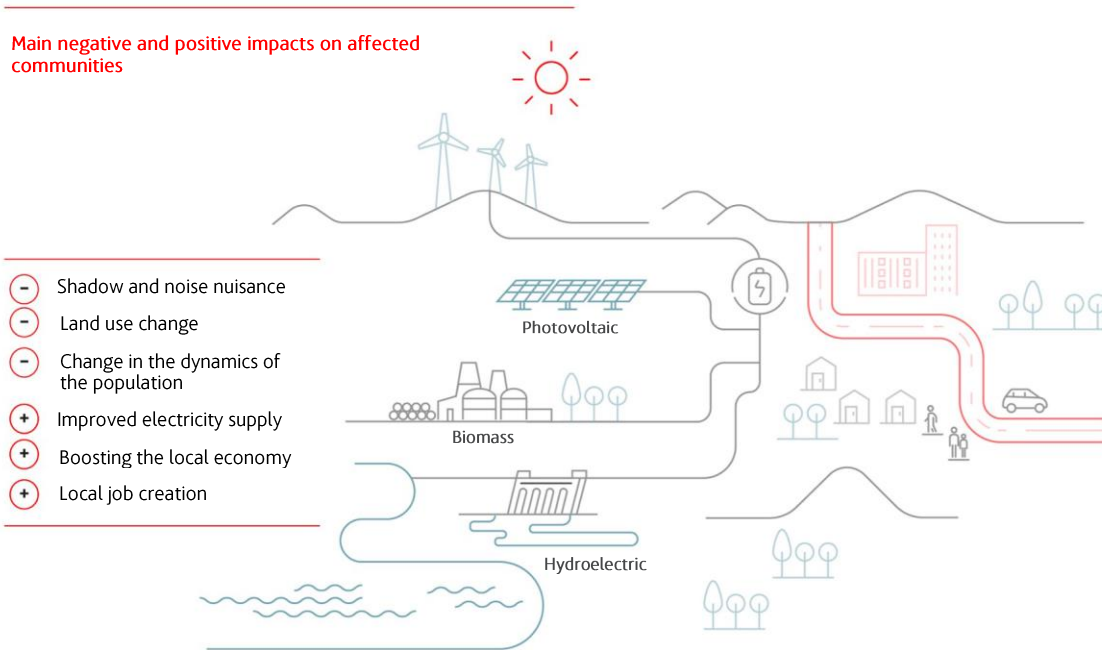
ACCIONA's Corporate Social Impact Management (CSM) Standard applies to communities affected by the company's operations and projects.

The Social Impact Management methodology starts in the project development phase, where social risks and impacts are analysed with a dual materiality approach. Based on the results of the study, the budget allocation to be used for social impact management is made.

ACCIONA Energía then identifies the affected communities in the area of influence of the project, service or activity in question and carries out a study of their characteristics. Firstly, it analyses the existing socio-economic conditions of the populations, including, among others, the demographic characteristics and distribution of the population in the territory, the economic characteristics, the political environment, the environmental setting, the presence of infrastructure and access to basic services, aspects related to education and health in the communities, human rights and other social aspects. In the identification of the characteristics of the communities, as well as in the process of engaging with them, special attention is paid to the identification of

vulnerable groups.

The company then identifies and assesses the actual or potential positive and negative social impacts that may occur as a result of project and/or service activities on communities, including the intrinsic impacts of the activity itself.



## Policies relating to affected communities (S3-1)

ACCIONA Energía's regulatory system establishes the principles and guidelines to be followed in the execution of the company's projects, services and activities in relation to the affected communities. The Policy Book, approved by the Audit and Sustainability Committee, articulates ACCIONA Energía's commitment to the human rights of communities. Specifically, these commitments can be found in the Human Rights Policy, the Stakeholder Relations Policy, the Social Action Policy, and the Policy on the Operation of the Ethics Channel. In turn, these are implemented through the Corporate Standard on Management of the social impact of projects, and in the Corporate Instruction on Communication and dialogue with communities and other stakeholders in the framework of social impact management, approved by the company's governing or management bodies. The Policy Book is accessible on the company's website and internal dissemination campaigns are carried out periodically. The internal regulations are available to own staff on the company's intranet.

These policies apply to all the enterprises, including subsidiaries and companies in all geographical areas where the company is present. The company promotes the adoption of these principles in those investee companies or economic interest groupings in which it participates and does not exercise management control or does not have a majority shareholding, among its suppliers, contractors, collaborators, as well as in the business associations and forums in which it participates.

ACCIONA Energía is committed to respecting the human rights of communities in accordance with the

International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work and its core conventions including ILO Convention 169 on Indigenous and Tribal Peoples. Similarly, the company is committed to providing redress for adverse human rights impacts on affected communities.

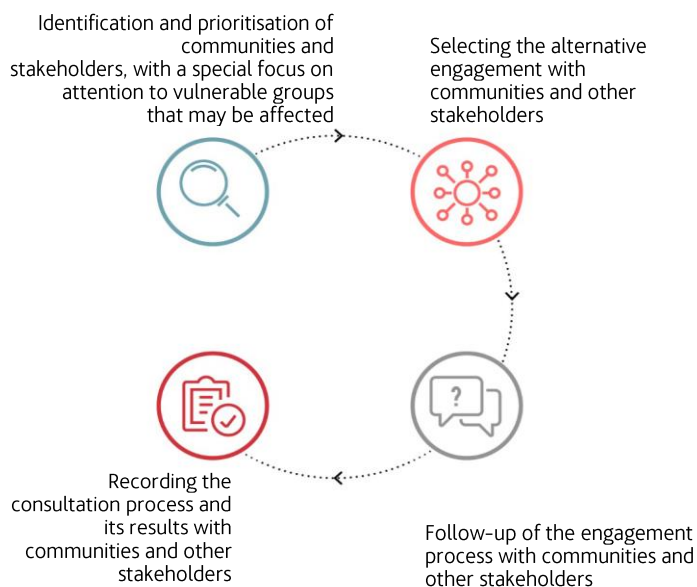
ACCIONA Energía seeks coherence between projects, services and activities and the needs of the community. To ensure that projects are coherent with its business model, ACCIONA Energía defined its own social impact management methodology, based on standards of international institutions (E&S Performance Standard, IFC) adapted to the various businesses and geographic contexts. This methodology is a differentiating element that must significantly contribute to mitigate the risk, maximise opportunities, minimise negative impact and increase positive ones. It has also defined a methodology for communication and dialogue with stakeholders with the aim of improving relations with the communities in the projects, services and activities in which it operates, including indigenous populations.

In 2023, we have been working on updating the Corporate Standard on Social Impact Management of Projects and the Corporate Instruction on Communication and Dialogue with Communities and other Stakeholders.

### Processes of dialogue with affected communities on impacts (S3-2)

ACCIONA Energía has a methodology for communication and dialogue with stakeholders that offers tools for managing relations with local communities, and is committed to respecting the right to a process of free, prior and informed consultation in accordance with current legislation and the International Labour Organisation's Convention 169 on Indigenous and Tribal Peoples.

The stakeholder engagement methodology has the following 4 phases:



→MAP OF COMMUNITY OUTREACH INITIATIVES



Depending on the particularities of the project, service or activity, communication is carried out through different mechanisms in the different phases of the social impact management process, encouraging early, business development and ongoing citizen participation. The type of engagement varies according to the identification and prioritisation of stakeholders, as well as the periodicity of the relationship. The relationship can occur in the same way with directly affected communities or their legitimate representatives.

**COMUNICA Logrosán, Meeting point for information and citizen participation, Logrosán Biomass Plant Project, Spain.**

ACCIONA Energía organised a meeting point for information and citizen participation at the Logrosán Cultural Centre in order to facilitate communication and dialogue with the community around the project. Professionals from different areas of the company explained details of the project and its potential impacts. The attendees had the opportunity to see, in a graphic and accessible way, different information about the project, solve their doubts in a personalised way and talk to company staff in a close and relaxed environment. The satisfaction survey carried out by the attendees shows that the result was very positive, with a score of 4.6 out of 5.

Link to the news: <https://www.biomazalogrosan.es/>

## Employment-Centric Connectivity Conference, MacIntyre Wind Farm Project, Australia

ACCIONA Energía considers stakeholder relations to be a valuable and effective tool. In its interest to facilitate appropriate networking spaces, the MacIntyre Wind Farm team organised a conference to encourage networking and connectivity between the parties with a special focus on employment generation. The event aimed to generate discussions on the future impacts of population growth on the region and its existing services, as well as to generate ideas on solutions and strategies that could help prepare the region for the future and maximise opportunities. The programme aims to support economic activity by bringing together a variety of organisations and individuals, including registered training organisations, labour service providers, health services and community service organisations. By prioritising community participation and knowledge sharing, ACCIONA Energía aims to help strengthen the resilience and sustainability of the region.

Link to the news: <https://warwicktoday.com.au/news/2023-06-27/acciona-powers-up-a-new-conference>



## ACCIONA Energía's strategies to remediate impacts and listen to communities (S3-3)

ACCIONA Energía has a firm commitment to ensuring that its business and professional activities comply with the current laws of each of the places in which it operates, guaranteeing full compliance with the best national and international practices, as established in its Code of Conduct (the "Code of Conduct"). The Ethics Channel is ACCIONA Energía's internal reporting system that allows individuals to report any irregularities, breaches or misconduct related to the company's activities vis-à-vis the current legal framework, Code of Conduct, and/or ethical values of ACCIONA Energía, including those related to community issues.

The possible ways to make a communication through the Ethics Channel are: in writing, through the Ethics Channel form published on the website and on the intranet; by post; verbally, by voice messaging through the Ethics Channel or through a face-to-face meeting; by videoconference or by telephone with a representative of the Ethics Channel Commission (or, where appropriate, with the members of its team that may be designated), upon request of the informant.

The management of communications received through the Ethics Channel is the responsibility of the Ethics Channel Commission. The processing of communications does not exceed three months, except in cases of particular complexity, in which case they may be extended for an additional three months. Whistleblowers receive an acknowledgement of receipt of the communication made and, if possible, the whistleblower will be provided with a brief explanation of the investigation results during aforesaid period.

Management is based on the principles of confidentiality, respect for the anonymity of persons who do not wish to identify themselves, impartiality and objectivity, absence of reprisals, and respect for privacy and data protection rights in accordance with the company's commitments in its Policy on the operation of the Ethics

Channel.

In addition, ACCIONA Energía establishes communication channels and activities at the operational level. For 100 % of its projects, services and activities the company has different communication channels such as websites, web forms, e-mails, telephone lines, suggestion boxes, regular meetings and customer service offices for the local community. Through these, the stakeholders affected can share their suggestions, consultations and/or complaints.

### **Community Assistance Offices, Peru and Australia.**

ACCIONA Energía has promoted the creation of Community Assistance Offices in different countries where it operates. The purpose of these spaces is to guarantee the right of community members in the area of influence of the projects to be informed, suggest and/or complain about activities that may have positive or negative impacts on the dynamics of the community. In this way, neighbours are invited to participate in the life of the project by generating shared value. These experiences have allowed for better communication with the community, as well as identifying priority issues and finding common ground for action. During 2023, Community Assistance Offices have been launched in Peru and Australia.

### **“Dialogue with the community”. Spain.**

ACCIONA Energía has launched an initiative aimed at facilitating communication and dialogue with all the residents of the municipalities affected by its projects in the development phase. This seeks to promote more effective communication, with the aim of informing about the real impact of renewable energy projects and resolving the most frequent doubts related to the implementation of this type of projects, accompanying the community during the initial phases and the time prior to their execution. This initiative has a two-fold objective: on the one hand, to promote, disseminate and spread the message of energy transition and sustainable development through renewable energies, and, on the other hand, to involve the community in the projects that the company develops in order to make them participants in them. Finally, a survey is carried out in order to obtain relevant information on the perception of the project through its neighbours and conclusions that would allow a predictive analysis of the future social trend in the municipality.

## Adoption of measures for material impacts on communities by ACCIONA (s3-4)

ACCIONA Energía has a specific budget line in its projects, services and activities for the implementation of social measures to manage the social impacts, both positive and negative, derived from its projects, services and activities. ACCIONA Energía identifies and assesses the impacts of its activities, and according to the results, the social impact management methodology requires priority measures to be established for those impacts assessed as high.

Furthermore, if any material impacts on human rights are identified, the methodology requires the establishment of priority prevention and mitigation measures. The company also undertakes to develop or help devise remedies if risks materialise.

The development and monitoring of social measures is carried out through social management planning. Social measures are launched using the budget pledged in the pre-construction and construction phases, corresponding to at least 0.3 % of the BOP of the construction of a project. Similarly, in the operation phase of the facility the investment each year is at least 0.2 % of the “gross sales” for the project during the previous year during the first 10 years of operation of the facilities; the investment could continue throughout the entire useful life of the project.

### →SOCIAL IMPACT MANAGEMENT INITIATIVES MAP





### **Northern Cape Honey Farmer Incubator, Shishen Photovoltaic Plant, South Africa.**

Through the implementation of the Social Impact Management methodology in the Shishen Photovoltaic Plant project, ACCIONA Energía has developed the Northern Cape Honey Farmer Incubator Business Development Programme. This initiative aims to foster sustainable development in the historically disadvantaged communities of Olifantshoek, Kathu and Dibeng by providing them with the tools to start as entrepreneurs in the beekeeping sector and accompanying them so that in the medium term they can operate independently as SMEs. This initiative aims to make local entrepreneurship projects self-sustainable in the long term. The programme plans to create 50 jobs, 10 main agricultural cooperatives, a warehouse and a bottling facility. It is expected to contribute 2 million South African rand per year (approximately €100,000) to the local economy through honey sales. In 2023, the programme had 54 direct participants and has also broadened its impact targets to include expansion into other condiments, such as jams and chakalaka, which are also derived from honey production.

### **TokT, Cuidat and Pintat de Rosa, Santa Cruz and Oaxaca wind farms and Puerto Libertad photovoltaic plant, Mexico.**

Since 2019, ACCIONA has been running the TokT, CuidaT and PintaT de Rosa campaign in the communities near the Santa Cruz and Oaxaca wind farms, and around the Puerto Libertad photovoltaic solar plant. The aim of this campaign is, firstly, to raise awareness among the population at risk about the importance of preventing breast and cervical cancer, and secondly, to provide a service of specialised studies of mastography, ultrasound and cytology, as well as the follow-up of cases with any abnormality detected. In 2023, campaigns were conducted in communities in Sonora, Tamaulipas and Oaxaca. In total, 450 women benefited, being able to undergo the necessary mastography studies for the early detection of breast and cervical cancer.

## **Audits on the use of the SIM methodology**

ACCIONA Energía carries out external assessments regarding the level of implementation of the SIM methodology, checking compliance with the Corporate Standard on Social Impact Management in the projects. The process includes the results of specifying the social risk and budget allocation; the assessment of the project area of influence, service or activity; the identification and assessment of social impacts –positive, negative, real or potential– derived from operations; the matching of the social measures proposed with the priority impacts;



the identification of stakeholders, and communications and dialogue with them. They concluded that it is being implemented correctly in every phase.

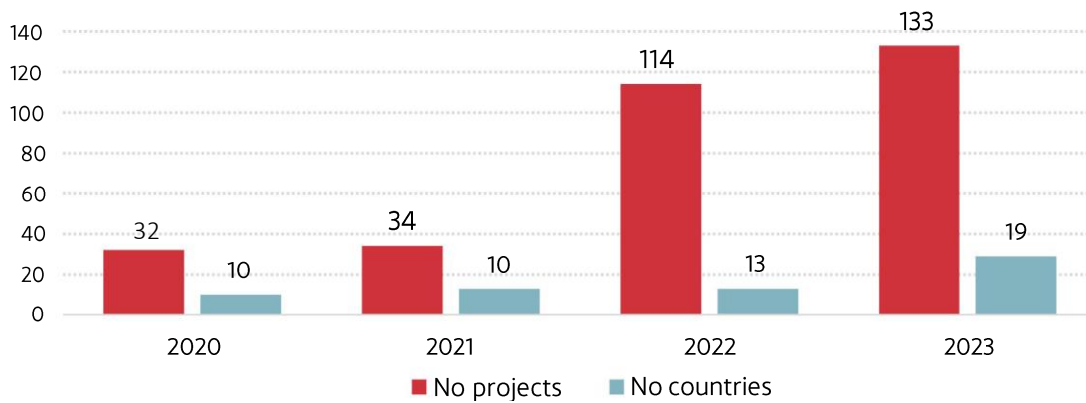
**EVOLUTION OF THE SOCIAL IMPACT MANAGEMENT AUDITS**

	2020	2021	2022	2023
TOTAL NO. OF AUDITS	2	2	2	2

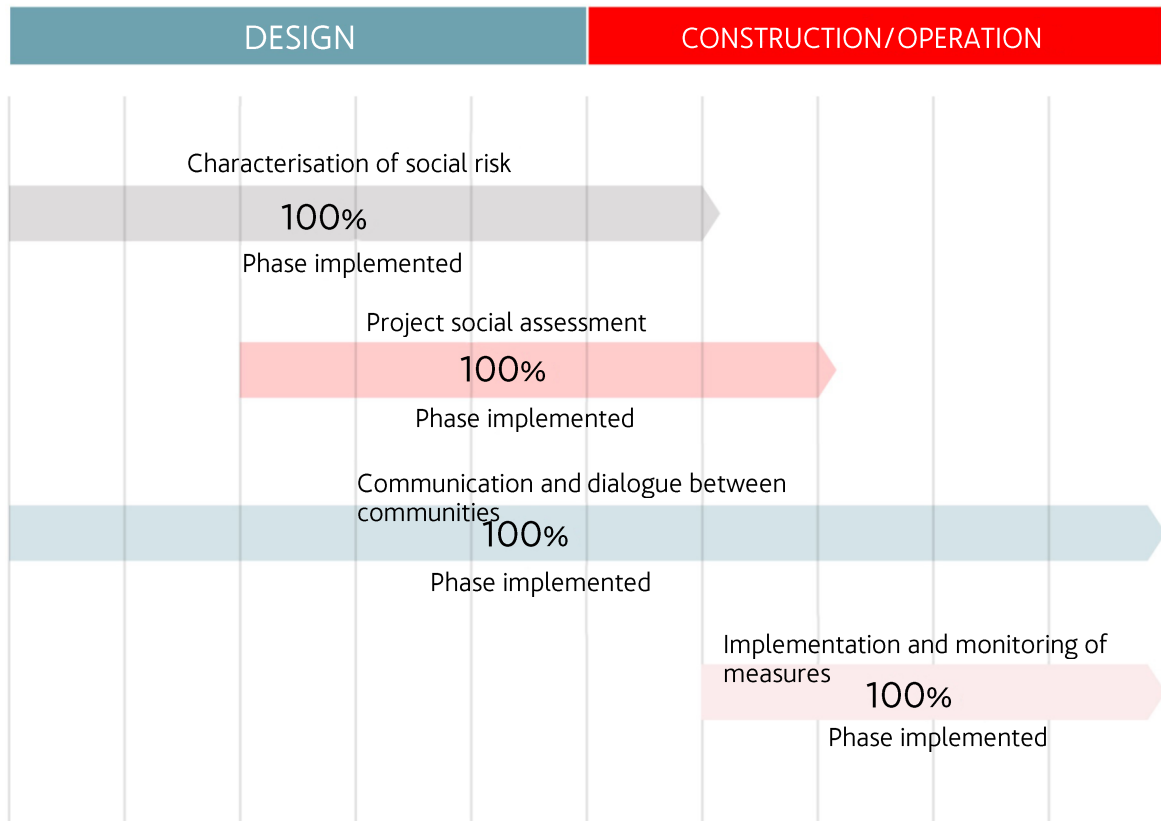
**Social Impact Management metrics (S3-5)**

In 2023, the methodology on Social Impact Management was implemented on 133 projects (16.6 % more than in 2022) in 19 countries.

**EVOLUTION OF THE IMPLEMENTATION OF SOCIAL IMPACT MANAGEMENT (SIM) METHODS**



PHASES OF SIM METHODOLOGY AND STATUS OF IMPLEMENTATION (% OF THE TOTAL PROJECTS WITH SIM)



## S4 Customers and End Consumers

At the heart of ACCIONA Energía's strategy is an unwavering commitment to sustainability and operational excellence, ensuring that the company's activities are aligned with the Quality Policy and following the ISO 9001 certified quality management system, avoiding negative material impacts on people and the environment. The company strives to offer a personalised service to its customers, adjusting its strategy to the specific needs of each one of them, with a focus on continuous improvement in the quality of its products and services.

ACCIONA Energía serves a wide range of customers, covering both the business-to-business (B2B) and business-to-consumer (B2C) segments, to whom it offers a complete set of solutions for their decarbonisation, ranging from the supply of renewable energy to energy services and electric mobility.

In 2023, ACCIONA Energía has significantly increased the number of B2C customers, mainly due to the growth of the Acciona Recharge business (from 27,443 total registered users in 2022 to almost 51,000 in 2023) and the incorporation of the company "Solideo" dedicated to the installation of photovoltaic self-consumption and energy trading, with a customer portfolio of more than 2,000.

The type of customer varies according to the services offered by ACCIONA Energía:

- **Renewable energy sales services:** ACCIONA Green and the International Marketers offer renewable electricity trading services to large accounts and SMEs around the world, including comprehensive management from contracting to customer service. On the other hand, ACCIONA Energía Households and SMEs provides consultancy and engineering services specialising in photovoltaic installations for both end consumers and companies, including the installation of batteries and comprehensive energy management through Solideo Energy.

### Long term agreements (PPAs)

Long-term power purchase agreements (PPAs) have become a key tool for ACCIONA Energía, facilitating companies' path towards decarbonisation and offering price and supply stability.

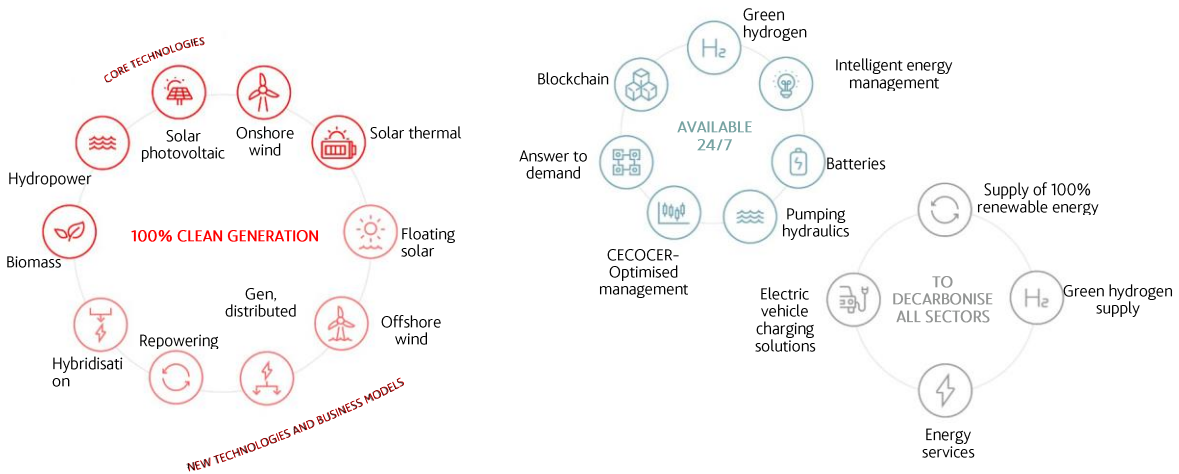
In 2023, the signing of new PPAs, such as those with Stanwell Corporation in Australia and Fortia in Spain, is evidence of the growing confidence and satisfaction of customers with ACCIONA Energía's services. The company has secured more than 15.6 TWh in long-term contracts with more than 170 customers, covering markets in Spain, Australia, the United States, Portugal, South Africa, Chile and Mexico. This volume of contracts underlines ACCIONA Energía's capacity to generate renewable energy on a large scale, with an installed capacity of 13,000 MW between photovoltaic and wind assets, reinforcing its commitment to moving towards a sustainable energy future.

- **Energy services:** ACCIONA Energía has a wide range of energy solutions for the decarbonisation of its customers. ACCIONA Solar offers operation, maintenance and management services for solar farms. ACCIONA ESCO also offers services to B2B clients focused on improving the energy efficiency of facilities and production processes, both for public entities and private clients in various sectors and geographies. In 2021 ACCIONA Energía acquired Equinov in France, providing energy savings and efficiency services, including energy audits and demand aggregation. As part of its energy services, ACCIONA Energía has one of the largest Renewable Energy Control Centres (CECOER), which manages more than 400 of the company's own renewable generation facilities and 270 customer substations in more than 20 countries, managing a total of 13,000 MW in all.
- **Electric mobility:** Through its charging network and charger management application, ACCIONA Recarga serves customers and end consumers, facilitating the transition to electric and clean interurban mobility.

These services included the commercialisation of energy to more than 16,000 public and private sector customers, the signing of power purchase agreements (PPAs) with 9 private customers representing more than 1,650 GWh/year, the provision of energy efficiency services to 27 customers in Spain and 49 other countries, as well as the management of electric vehicle charging with 50,900 registered users and agreements with 20 B2B customers, including both public and private contracts.

This diversity of services demonstrates ACCIONA Energía's commitment to meeting a wide variety of needs in the renewable energy market.

**DECARBONISATION SOLUTIONS**



**Strategy for quality management**

ACCIONA Energía prioritises customer satisfaction by applying the highest standards from the commercial proposal to the development of the service or delivery of the product. This commitment is developed through a cycle of continuous improvement, guaranteeing the information, security and privacy of its customers. This strategy is reinforced by robust customer service, dedicated to strengthening the relationship with its customers, which is fundamental to the company's sustainable growth.

Quality of service starts with understanding the needs and expectations of customers, from the early stages of business development where sales teams play a key role. Once the service has been provided, the customer

service teams monitor quality indicators, resolve queries, complaints and claims, and provide ongoing support for any need.

ACCIONA Energía undertakes to establish legitimate and effective mechanisms for remediating the adverse impacts that it could cause or could contribute to causing to the human rights of its stakeholders. The company recognises its influence with respect to encouraging commercial partners to provide effective reparation measures.

## Risks related to ACCIONA Energía's customers and end users (IRO-1)

The main risks for ACCIONA Energía's customers and end consumers are associated with the possibility of not delivering services or products as agreed, or the operational failure of generation, efficiency or electric mobility solutions. In its different business lines, the company implements different strategies to mitigate these risks effectively:

ACCIONA Solar and ACCIONA Recarga show successful risk management, with measures that ensure high availability rates and proactive management of any incidents, with monitoring of availability indicators.

Energy Services monitors quality and service delivery indicators to mitigate any risk of non-compliance with the contract, without identifying relevant risks or significant negative impacts.

For the commercialisation of energy, any installation failure that prevents supply is identified through the existing monitoring equipment, which enables rapid intervention for repair or replacement, guaranteeing the continuity and quality of service.

## Policies and commitments to customers and end-consumers (S4-1)

Through its [Policy Book](#) ACCIONA Energía is committed to all its stakeholders to reduce the risks and promote the opportunities linked to its activity.

The prime objective of ACCIONA Energía is satisfying the needs and expectations of customers and users. For this reason, the company has a Quality Policy<sup>8</sup> focused on guaranteeing the safety of customers and users, ensuring that its products and services meet the highest standards of quality and safety. At the same time, in line with the company's Human Rights Policy<sup>9</sup>, it is committed to respecting the privacy and intimacy of all the people with whom it interacts, diligently protecting their personal data and confidential information. ACCIONA Energía also has an Ethics Channel Operating Policy<sup>10</sup> accessible to all its stakeholders, including customers and users, offering a transparent and responsible means of reporting any possible violation of human rights or breaches of company policies, guaranteeing the protection and anonymity of informants, in line with the principles of transparency and

<sup>8</sup> **ACCIONA Energía's Quality Policy:** ACCIONA Energía's Quality Policy is aligned with ISO 9001, a recognised international standard that establishes the criteria for an effective quality management system. This policy emphasises guaranteeing customer safety and satisfaction by ensuring that the company's products and services meet high quality and safety standards, in line with ISO 9001 principles that promote continuous improvement and customer focus.

<sup>9</sup> **ACCIONA Energía's Human Rights Policy:** The company's Human Rights Policy is in line with the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenants on Civil, Political, Economic, Social and Cultural Rights, and other relevant frameworks such as the ILO and OECD Guidelines for Multinational Enterprises. This policy reflects ACCIONA Energía's commitment to respect for privacy, intimacy and the fundamental rights of individuals, aligning itself with these international instruments to protect human rights in all its operations.

<sup>10</sup> **ACCIONA Energía's Ethics Channel Operating Policy:** ACCIONA Energía's Ethics Channel Operating Policy complies with Law 2/2023, on the protection of whistleblowers and the fight against corruption, and applicable local regulations. This channel provides a secure and confidential means for employees, customers and users to report possible human rights violations or ethical and legal breaches, guaranteeing the protection and anonymity of the informants, in line with the principles of transparency and corporate responsibility.

corporate responsibility.

## Product health and safety

One of the basic principles of the Quality Policy is to ensure the health and safety of customers and users. To this end, ACCIONA Energía works with certified technological solutions that accredit compliance with the quality and safety standards of the products it offers, and which are complemented by the corresponding certificates for each technology and service that accredit compliance with quality standards, such as CE marking or international standards, together with operating instructions and manuals for customers and users. During 2023, no communications on non-compliance were received regarding customer health and safety.

## Certified management systems

ACCIONA Energía's electricity trading activity stands out for its commitment to sustainability and quality, offering 100 % renewable energy with guarantees of origin verified in accordance with the mechanisms in force in the different countries in which it sells its operations. In Spain, commercialisation is supported by certificates issued by the CNMC, while in Mexico IRECs and CELs are used to accredit renewable origin. Portugal, on the other hand, has EEGO certifications from REN. This dedication to renewable sources is complemented by the certification of all MW installed under ISO 9001 and ISO 14001 standards, ensuring high quality standards and respect for the environment in energy generation.

The Energy Services activities are also noted for their excellence, with an ISO 9001 certified quality management system for all its operations. In addition, ACCIONA ESCO (part of the Energy Services business line) has an ISO 50001 certified energy efficiency management system in Spain and is recognised as an Energy Service Provider in accordance with Spanish standard UNE 216701. Solideo, focused on photovoltaic installations for self-consumption, has the quality seal of photovoltaic installer for self-consumption, being a reference within the sector for its quality of service.

The company also has an environmental management system applicable to all its renewable generation assets and the Energy Services business line in Spain. In addition, innovation activities are certified according to the UNE 166002:2021 standard in R&D&I, which endorses its innovative leadership in technologies that enable the decarbonisation of the economy.

## Product and service labelling

ACCIONA Energía offers its customers and users adequate information so that they can make safe use of the products and services it provides.

At ACCIONA Recarga, all the chargers in the network have stickers with instructions for use and QR codes to access additional information via the ACCIONA Recarga app. This makes it easier for users to understand and use the recharging points properly. ACCIONA ESCO and ACCIONA Energía Home and SMEs offer CE certified equipment, ensuring its safety and quality.

## Dialogue with clients and end-consumers (S4-2)

ACCIONA Energía establishes different processes and channels of effective communication to gather the expectations and opinions of its customers, supervised both internally and through external audits.

During 2023, the company revamped its online presence with the launch of a new [corporate website](#). This

platform is more oriented towards comprehensive energy services, presenting customers with a broad catalogue of decarbonisation services aimed at companies and institutions. Dialogue with customers has also been a priority for ACCIONA Energía this year, and a number of initiatives have been carried out from various commercial points. The following channels of communication are particularly noteworthy:

### Energy services:

ACCIONA Solar has its own web portal (<https://huertasolar.accionacom/>), and has several communication channels, such as e-mail ([sacsolar@accionacom](mailto:sacsolar@accionacom)) and telephone 948 166 800. During the year, new customer dialogue experiences have been implemented, such as open days at facilities, and new channels have been opened, such as TEAMS, available from Monday to Friday during office hours.

ACCIONA ESCO has a team of technicians specialised in industrial processes who accompany the client in a pre-audit or energy diagnosis, which leads to the proposal of solutions adapted to the client's needs.

EQINOV frequently participates in different forums related to the energy sector and has made communications through the media to share experiences in the energy sector, including electricity flexibility mechanisms.

Solideo offers a web contact form and a free phone number (679 40 00 40 and 900 171 019) published on the web and Google Maps. It also operates a call centre service with on-site staff during working hours from Monday to Friday; in addition, it receives feedback through reviews and notes on Google Maps.

### Renewable energy supply company:

ACCIONA Energía prioritises effective communication and active listening with its customers, implementing a comprehensive communication strategy. This is achieved through a customised application, 24/7 customer support by phone, email, post and website, and a dedicated sales team to maintain a continuous and direct dialogue. The company ensures efficient customer service, with a detailed record of all interactions in a computerised system, and emphasises incident resolution, particularly those involving distribution entities. Closeness to customers is strengthened through frequent communications, acknowledgements, regular meetings and regular visits by project managers to address concerns and share relevant updates. In addition, weekly newsletters are sent out with news on the energy market in Portugal, reaffirming the commitment to offer multiple communication channels tailored to the needs of customers.

### Electric mobility:

ACCIONA Recarga, for both the B2C and B2B segments, offers continuous and personalised assistance. For B2C customers, a 24/7 support team is available to resolve incidents, complaints and claims, accessible via telephone and email at [recarga@accionacom](mailto:recarga@accionacom). In addition, B2B customers have access to the generic mailbox [atcliente.recarga@accionacom](mailto:atcliente.recarga@accionacom) and a contact form on the website [www.soluciones.accionacom](http://www.soluciones.accionacom) for their enquiries. Communication for B2B clients is personalised via telephone or email once work or the bidding process begins.

ACCIONA Energía implements rigorous processes to guarantee the authenticity of commitments and contracts with its customers and end users, applying identity verification methods, advanced electronic signatures and legal review. These procedures are applied uniformly across all business areas and markets, ensuring the validity of agreements and providing certainty to both the company and its customers.



## Customer satisfaction

ACCIONA Energía considers customer satisfaction as a key element in its commercial proposition and employs various strategies to assess it and improve the customer experience. Satisfaction indicators are derived from both direct measures, such as asking customers about their overall satisfaction or satisfaction with specific processes, and indirect measures, including performance indicators, compliance with service levels, contracted terms and renewal rates. This combined approach allows ACCIONA Energía to gain a complete understanding of the customer experience and to continuously work on improving it.

Direct satisfaction measurement campaigns are customised according to the type of service or product contracted, ensuring that the channels and frequency of contact are optimal and avoid customer saturation. Therefore, automated processes have been set up to assess the customer experience in specific processes, such as customer service and recruitment. These include requests for feedback from random customers on aspects such as the offer information received, the pre-signing service and the signing process itself. In addition, beyond the global surveys aimed at capturing overall service perception, which are collected through digital or telephone channels, special attention is paid to the "voice of customers" in digital channels. This is done through regular analysis of reviews and ratings on websites and applications, enabling active and continuous listening to customers' needs and perceptions.

ACCIONA Energía and its various solutions employ a variety of methodologies in their customer satisfaction campaigns. For example, ACCIONA Recarga uses e-mail with a form, while ACCIONA Solar combines telephone campaigns with postal mailings in case the customer's telephone number is missing. ACCIONA ESCO opts for forms and interviews, EQINOV conducts annual online surveys for Energy Flexibility customers and quarterly surveys for White Certificates and Energy Consultancy customers. ACCIONA Energía Households and SMEs makes random calls to customers, in addition to obtaining evaluations after interactions with customer service or through forms associated with incident closure e-mails. ACCIONA Green (Comercializadora España) contacts a representative group of customers via phone calls and collects ratings in the app or after queries to customer service. The marketers in Mexico and Chile conduct form-based surveys, while the marketer in Portugal uses form-based e-mail.

The company also analyses performance indicators that can provide information on customer satisfaction, such as contracting times, service availability, number of complaints and claims, incident resolution time and churn rate. These indicators help to assess the degree of satisfaction and to identify areas for improvement.

In 2023, ACCIONA Energía sent a total of 19,051 surveys to its clients, with a high response rate of 94 %. In addition, the company's quality management system focuses on learning from customer incidents, complaints and claims in order to increase customer satisfaction and continuously improve the services and projects offered.



EVOLUTION OF CUSTOMER SATISFACTION (%) [S4-5]

	2020	2021	2022	2023
Satisfied customers	99 %	100 %	100 %	99.6 %

During 2023, ACCIONA Energía significantly increased the scope of its customer feedback collection, sending out a total of 7,500 surveys compared to 1,850 in 2022. Of these surveys, 1,422 responses were received, compared to 209 responses in 2022. The most commonly used methodology was the direct call from Customer Services, followed by online forms sent by email, although the latter showed lower response rates.

The energy marketer in Spain expanded its sampling efforts to achieve more robust and meaningful responses. Almost 5,000 calls were made, resulting in 820 responses. The average customer satisfaction rating for this marketer was 8 out of 10, which is considered "Satisfied Customer".

ACCIONA Energía's satisfaction reports have shown stable and high levels in recent years, with average ratings above 8 out of 10. In 2023, due to the diversification towards B2C customers, a higher number of satisfaction survey responses were obtained, with ratings ranging between 8 and 9 for B2C customers.

**Successful Energy Services Projects**

In early 2023, two lighting renovation projects were completed at a customer's steel plant in Avilés (Asturias). These contracts were executed on time and received high customer acceptance, as reflected in the satisfaction survey scores of 9.07 and 8.67.

Subsequently, the contract for the Charleroi (Belgium) plant was awarded, which was also well received by the customer, as evidenced by the recent signing of a new contract in Fos-Sur-Mer (France). The excellent performance of the team involved in these projects has strengthened the relationship with the client and has allowed the continuity of this relationship, achieving the quality standard sought by the client and obtaining satisfactory results for the company.

## Handling of complaints and claims with customers and end consumers (S4-3)

ACCIONA Energía's complaints and claims handling system adapts to different communication channels to ensure efficient and easy processing by the customer. To ensure an adequate quality of response, there is a common manual for all customer service teams, who have the continuous support of the technical teams when specific information is required.

In activities with a large number of customers, the main channels are telephone and e-mail. Computer systems are used to record all customer interactions and assign tasks to the relevant teams for resolution.

For **renewable energy marketing** services, complaints and claims 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. Queries and complaints are recorded in computer systems that assign a unique code to each customer for follow-up. A first response is guaranteed in less than 48 hours and resolution in less than 30 days.

For **energy service** solutions, personalised attention is available depending on the type of service. ACCIONA Energía Households and SMEs has a customer service and call centre with digital support for efficient management. Consultations are recorded in a computer system for proper follow-up. In other businesses, such as ACCIONA ESCO, Eginov, personalised attention is provided by the project management staff, which facilitates the identification and resolution of doubts and complaints.

In 2023, ACCIONA Energía significantly expanded its B2C customer base, driven by the growth of the ACCIONA Recarga business (from 27,443 total registered users in 2022 to almost 51,000 in 2023) and the incorporation of the company "Solideo", dedicated to the installation of self-consumption photovoltaics and energy retailer, with a portfolio of more than 2,000 customers.

In **electric mobility** services, ACCIONA Recarga's complaints and claims service is managed by telephone, the contact form on the website, and has an IT management system for efficient analysis.

### EVOLUTION OF COMPLAINTS [S4-5]

	2021	2022	2023
<b>Business to Business (B2B)</b>			
No. of complaints TOTAL	160	1,192	5,802
B2B complaints successfully closed (%)	90 %	84 %	94 %
<b>Business to Consumer (B2C)</b>			
No. of complaints	31	32	219
B2C complaints successfully closed (%)	100 %	100 %	100 %

## B2B customer complaints

In 2023, ACCIONA Energía experienced a significant increase in the total number of complaints from B2B customers. This increase was largely due to the increase in the number of customers and supply points in the activity of energy supply to SMEs in Spain. The number of contracts managed in 2023 was four times higher than in 2022, resulting in a corresponding increase in claims. In addition, changes to the customer management software and billing system were implemented, which impacted the volume of complaints during the year.

In contrast, marketers in Mexico and Chile experienced stability in the number and average time to resolve complaints, reflecting a constant internal and external context in their activities. On the other hand, in Portugal, the average claim closure time decreased significantly from 12 days to less than 4 days.

Despite these changes and challenges, it is important to note that the percentage of complaints closed to the satisfaction of both parties increased by 10 %, reaching a level of 94 %. This increase is attributed to improvements in operational systems and the consolidation of the Customer Care team and process of the renewable electricity marketer in Spain.

The growth and diversification of ACCIONA Energía's B2C customer portfolio in 2023 has led to an increase in the number of claims for this type of customer. Until 2022, claims were few and far between and focused on the operation, maintenance and customer service activities of solar farms.

In 2023, claims came mainly from the business of Solideo, which offers rooftop PV services and intends to grow in other household service segments, such as energy trading. In addition, the increase in electric vehicle charging services also contributed to the increase in complaints. Despite this increase, response times were kept low and 100 % of complaints were satisfactorily closed, demonstrating an ongoing commitment to the satisfaction of all types of customers with whom the company works.

### **Improved customer service and project management software at ACCIONA Energía Households and SMEs (Spain)**

During 2023, the management of customers in this business line was optimised through the creation of a dedicated team responsible for the direct handling of customer enquiries, both potential and existing. This team has benefited from the recent connection of the IT systems on which each department of ACCIONA Energía Households and SMEs operates, enabling them to respond satisfactorily to customer needs. In this way, when a customer calls the call centre with a query or incident, they do not need to explain what their installation is like or when it was commissioned, as all the systems are connected and an efficient response can be provided in a shorter time,

## **Non-compliances**

Despite not being a matter regarding Health and Safety in ACCIONA's service, the energy supplier in Portugal was subject to an inspection on its compliance with all the applicable regulations and laws in November 2023. Said inspection revealed two faults or missing information that should be included in the bills sent out to consumers: information on the web page for people to file complaints and the web page with OLMC energy pricing simulators. On the other hand, the yearly report for customers is missing recommendations for efficient energy consumption and the customers' pricing history. The company replied to this notice and rectified the faults pointed out.

During 2023, there were no court rulings related to non-compliance with regulations or voluntary codes regarding marketing communications. There were also no non-compliances related to product and service information and labelling, reflecting ACCIONA Energía's commitment to transparency and regulatory compliance.

## Action plans to improve customer service for ACCIONA Energía's various services (S4-4)

### Commercialisation of renewable energy:

ACCIONA Green, supply company in Spain, is developing a project to introduce a new customer website with the aim of offering more efficient and intuitive customer service. At the same time, it is working on improving the evaluation of the effectiveness of its customer services by including indicators that reflect the status of incidents, complaints and claims.

Marketers operating in international markets are establishing various strategies to improve customer service. These include the development of customer service staff skills, the implementation of new projects to reduce incident response times, the adoption of professional tools for more effective query and incident management, and the expansion and internalisation of the customer service team to optimise analytical reporting.

### Energy services:

Acciona Solar focuses on the excellence of the customer service team, improving resources and organising training sessions to manage risks and incidents effectively. Responds to incidents and complaints efficiently, reporting limitations through monthly communications. EQINOV promotes energy efficiency by publishing "White Papers" on electricity flexibility and building management on its website, improving access to services for more customers and customising the user space to facilitate availability management.

### Electric mobility

ACCIONA Recarga has launched an extended customer service that now covers 24x7 and is supported by a new IT tool that helps trace all the information related to the incident. To this end, several training sessions have been held for staff to ensure that they are competent in the use of the new system and in the knowledge of the measures to be taken according to the service manual, designed to standardise the response to the different types of problems that may arise.

## Continuous improvement and audits

ACCIONA Energía has implemented an integrated management system based on the continuous improvement cycle, which implies a commitment at all levels of the organisation to quality, the environment and health and safety in all its activities. Special emphasis is placed on the integration of these variables during the construction and operational stages, always taking into account the needs and expectations of clients and other stakeholders, promoting the use of various communication channels.

The planning of the work is characterised by a prior risk analysis, which leads to the implementation of the necessary preventive measures, which are reviewed through a system of inspections and alerts. Verification of the adequacy of processes is carried out through internal and external audits, including audits by customers and certification bodies. These audits are fundamental tools for ACCIONA Energía, as they help to identify opportunities for improvement.

During 2023, the company carried out a total of 118 internal audits covering quality, environment and health and safety, as well as 10 external audits.

## ACCIONA Energía Excellence Programmes

ACCIONA Energía leads the execution of annual programmes aimed at achieving excellence in its generation processes as a distinctive value to offer its customers compared to competitors, as well as reliability in the provision of the services offered. These programmes are articulated as follows:

- **Buy Quality**, whose purpose is the selection of suppliers with excellent performance levels both in the supply of their products and services, as well as in their management of the health and safety of people and the prevention of environmental impact, offering improvement programmes to some of them with concrete actions and monitored over time. Moreover, the programme ensures the implementation of common standards in construction processes, adapting the control and monitoring strategy according to the type of activity, technology or supplier.
- **Act Quality**, a programme aimed at maintaining levels of excellence, called Q1 to Q4, in assets in operation, based on audits carried out to assess the status and identify areas for improvement, with the result that by 2023 80 % of wind and photovoltaic assets will be above Q3, and 100 % of biomass plants and hydroelectric plants will be at the maximum level of Q4.

### Preview of the 2024 Targets for improvement

As part of the continuous improvement process, ACCIONA Energía constantly analyses the needs and expectations of its stakeholders. This is done by collecting information largely through customer listening processes such as satisfaction surveys, dialogue forums and targeted commercial actions. In addition, the internal and external context of the organisation is considered, assessing both the risks and opportunities that may arise.

Based on this analysis, annual objectives are established in the "Action Plan", which are monitored periodically by all countries and business units in various forums, including the Management Committee. At the end of the year, an evaluation of the level of performance against these objectives is carried out to measure the progress and effectiveness of the actions implemented.

BUSINESS LINE	TARGETS FOR IMPROVEMENT
Solar farms	<ul style="list-style-type: none"> <li>• Further details in the invoices by means of an annex explaining the services included and photographs of the equipment installed, if applicable</li> <li>• Creation of profitability sheets of the installations for customers, estimated cost overruns and standard income per farm and power.</li> </ul>
Marketing Company for Chile	<ul style="list-style-type: none"> <li>• Face-to-face meetings with customers to improve customer loyalty.</li> </ul>
Supply company for SMEs in Spain	<ul style="list-style-type: none"> <li>• Launch of a new telephone recruitment channel.</li> <li>• Improvement of recruitment service indicators, such as file completion time or customer satisfaction.</li> </ul>
Marketing company for Portugal	<ul style="list-style-type: none"> <li>• Expansion of the typology of target clients, incorporating SMEs as is done in Spain</li> <li>• New customer service, operational for the entry into the SME business, with the aim of reducing response times to incidents.</li> </ul>
Marketing Company for Spain	<ul style="list-style-type: none"> <li>• New customer website, with more information, more intuitive and with more self-management functionalities for the user in order to speed up procedures.</li> <li>• New billing system, more powerful in terms of capabilities to provide a better billing service to increasing volumes of customers</li> </ul>
ACCIONA ESCO	<ul style="list-style-type: none"> <li>• Incorporation of Smart City Gijón in its own energy management platform called OLYMPO, which allows visualisation of incidents, savings, consumption, etc. of thousands of lighting points.</li> <li>• Development of performance indicators for the energy savings monitoring service that facilitate the customer's understanding of the activity, as well as analysis and decision making. This has been</li> </ul>

	especially relevant in contracts such as Inditex or Madrid City Council
ACCIONA Recarga	<ul style="list-style-type: none"> <li>• Incorporation of POS (payment mechanisms) at recharging stations to facilitate user management.</li> <li>• Continuous training system for the customer service team with a technical perspective and sharing of best practices and lessons learned.</li> </ul>
Eqinov	<ul style="list-style-type: none"> <li>• Improvement and updating of the website and blog to meet the information needs of potential customers,</li> <li>• Diversifying mechanisms for listening to the voice of the customer</li> </ul>
Solideo (Acciona households and SMEs)	<ul style="list-style-type: none"> <li>• Improvement and updating of the website, to facilitate contact and the management of doubts.</li> <li>• Improvements in the digital tools for managing incidents, complaints and claims</li> </ul>
Energy Management for Mexico	<ul style="list-style-type: none"> <li>• Face-to-face meetings with customers to improve customer loyalty.</li> </ul>

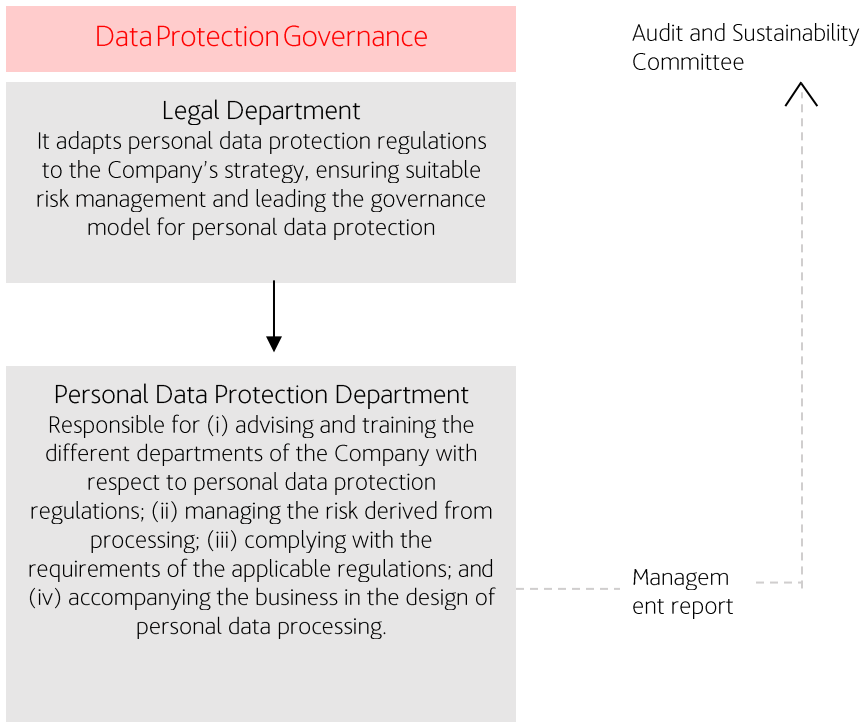
## Personal Data Protection and the Guarantee of Digital Rights

ACCIONA Energía is committed to the digitalisation and automation of processes to improve company productivity and customer and employee experience. With a view to overcoming the challenges entailed in becoming an entity that guarantees the protection of personal data, the company believes that it is a priority to maintain an appropriate system of security measures.

The importance of this issue is reflected in ACCIONA Energía's Personal Data Protection and Digital Rights Guarantee Policy. The internal regulations, which apply globally, establish that the Company and its subsidiaries, and by extension, its entire value chain, are obliged to act in accordance with legally established principles and rights regarding the protection, processing and privacy of personal data.

ACCIONA Energía also has staff specialised in Personal Data Protection that spearheads the organisation's commitment to the responsible use and protection of identifiable information of customers, consumers, employees and partners.

To guarantee adequate management of personal data protection, the following organisational structure has been established:



⊕ **Further information** about the [Personal Data Protection and Digital Rights Assurance Policy](#)

ACCIONA Energía provides mandatory data protection training for all its employees. To extend this culture to the supply chain, company suppliers must acknowledge the terms of a self-declaration document, which includes issues relating to personal data protection, as part of ACCIONA's control mechanisms.

# 05

## GOVERNANCE

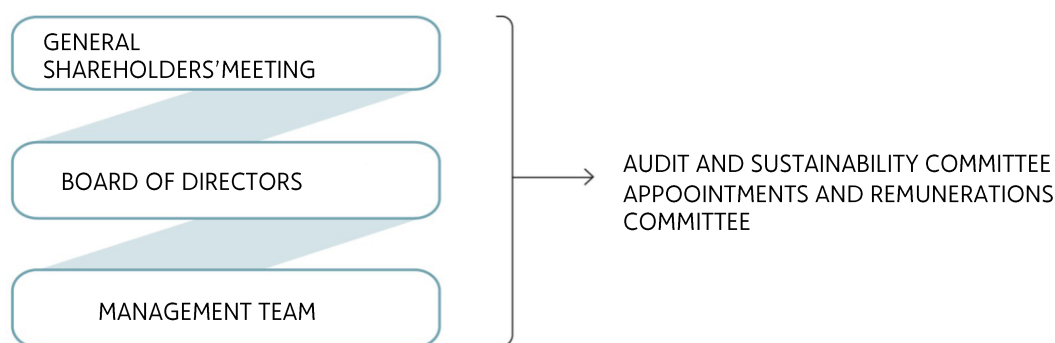


## Corporate governance

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



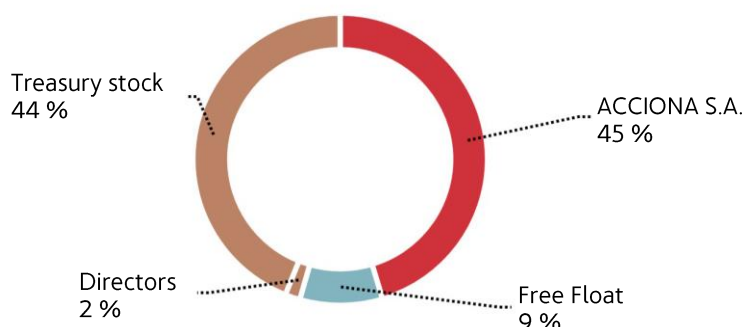
⊕ More detailed information on the governing bodies: [Board and committees](#)

### Shareholders and the Annual General Meeting

At the time of preparing this report, the share capital of the parent company was represented by 329,250,589 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.

SHAREHOLDINGS AS OF THE DATE OF PREPARATION OF THIS REPORT



 [More information on the Initial Public Offering](#)

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.

In relation to the Company's shareholding, in accordance with the applicable regulations, the transactions carried out under the Liquidity Agreement signed on 19 October 2021 with BESTINVER, S.V., S.A. were reported quarterly. In addition, on 6 March 2023, the Spanish Securities Market Commission (CNMV) was notified as Other Relevant Information (ORI) number 21184, of a direct purchase of 100,000 shares as direct treasury stock through a block transaction.

Furthermore, 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. Under the buy-back programme, 2,512,865 shares were acquired at year-end. The purpose of this Programme is 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 Meeting of Shareholders, 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. 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 2023 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 1 June 2023 in first call, various issues were discussed, amongst which the following:

- Approval of a dividend for a gross amount of €0.70 per share
- Approval of the annual accounts and directors reports.
- The renewal of the Board of Directors, which entailed the re-election of the majority of the Board members and the appointment of Ms. Teresa Quirós Álvarez, as a new independent director.
- Approval of the Statement of Non-financial Information and the Sustainability Report for 2022.
- Re-election of the company's auditors and its consolidated group for 2023.

All resolutions were approved with the vote in favour of at least 85.81 % 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

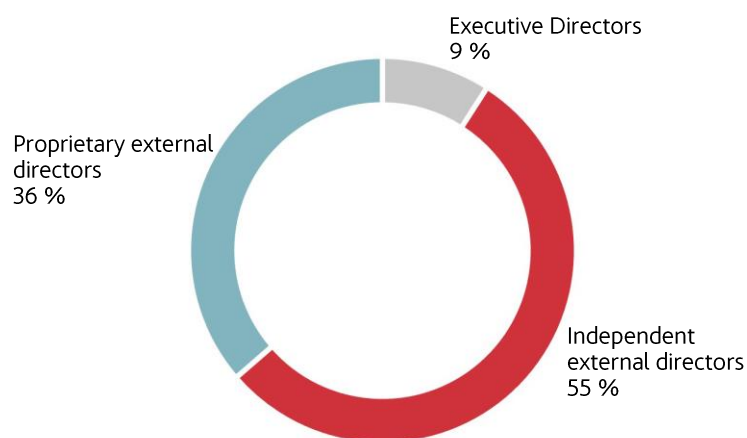
shareholders the same treatment in the same situation and to be guided by company interests, understood as achieving a profitable and sustainable business in the long term which promotes its continuity and maximizing the economic value of the company in benefit of the shareholders, seeking to reconcile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

ACCIONA Energía has a Board of Directors' Composition Policy that aims for greater gender parity in its governing body. In this regard, the percentage of female directors on the Board of Directors was 45 % by the end of 2023.

The Policy stipulates that the Board members will remain in office for three years and may be re-elected once or several times. Furthermore, the regulation stipulates that the Board members will remain in office for two years and may be re-elected once or several times. The Board of Directors of ACCIONA Energía is composed of eleven members:

- Six are independent directors.
- Four are proprietary directors.
- One is an executive director.

### COMPOSITION OF THE BOARD ACCORDING TO THE NATURE OF THE POSITION



BOARD OF DIRECTORS AS AT 31 DECEMBER 2023

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 (committee member)
Mr Juan Luis López Cardenete	Independent Director	2021	Appointments and Remunerations Committee (chairman)
Ms. Karen Christiana Figueres Olsen	Independent Director	2021	Appointments and Remunerations Committee (committee member)
Mr Alejandro Mariano Werner Wainfeld	Independent Director	2021	Audit and Sustainability Committee (committee member)
Ms. María Salgado Madriñán	Proprietary Director	2021	Appointments and Remunerations Committee (committee member)
Mr Rosauro Varo Rodríguez	Independent Director	2021	Appointments and Remunerations Committee (committee member)
Ms. María Fanjul Suárez	Independent Director	2021	Audit and Sustainability Committee (chairwoman)
Ms Teresa Quirós Álvarez	Independent Director	2023	Audit and Sustainability Committee (committee member)
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 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 is being carried out with the help of the firm Deloitte Legal, which, through questionnaires and individual interviews with each Director, in which their competencies are reviewed in detail, after analysing internal documentation, minutes, progress in the action plans designed by the Board of Directors, etc., presents its conclusions to the

Appointments and Remuneration Committee and the Board of Directors and accompanies them in the design of the Action and Improvement Plan resulting from this evaluation.

In addition to this evaluation, which includes a review of skills, a review of the skills 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.

### ATTENDANCE AND MEETINGS OF THE BOARD OF DIRECTORS AND COMMITTEES IN 2023

	BOARD OF DIRECTORS	AUDIT AND SUSTAINABILITY COMMITTEE	APPOINTMENTS AND REMUNERATIONS COMMITTEE
Quorum	98.48 %	95 %	96.43 %
No. meetings	12	10	7

In order to respond to current needs, the Board of Directors has a Directors' "website" that allows members to access the information, with sufficient time in advance of each meeting, and fosters communication between directors and the secretary, while at all times guaranteeing confidentiality, in addition to being able to hold meetings by video-conferencing in a safe, accessible environment.

## Management Team

The Management Team is composed of 12 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 Management Team is the connecting link between the Board of Directors and the rest of the company.

## Remunerations Policy

The directors' remunerations policy for the years 2021 to 2024 was approved as a separate point on the Agenda of 26 May 2021 and is also included in the Annual Report on Directors' Remunerations approved by ACCIONA Energía in 2022. 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 directors' remunerations policy was drawn up taking into account the changes introduced under the amendments to the Corporations Act passed in 2021 under Act 5/2021 of 12 April.

Subsequently, in order to have a Policy that would immediately adapt to the current needs of the Company, the General Meeting of Shareholders held on 1 June 2023, at the proposal of the Appointments and Remuneration Committee and the Board of Directors, approved a new remuneration policy to be applied from its approval and for the following three financial years, i.e. 2024, 2025 and 2026. The Company's remuneration policy, including that of the members of the Board of Directors who perform 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 recompense received by each individual director.

## G1 Business Conduct (ethics and anti-corruption)

### ACCIONA ENERGÍA GOVERNANCE FOR AN ETHICAL CORPORATE CULTURE

ACCIONA Energía has a governance model made up of different bodies and committees:

- Board of Directors: in terms of ethics and anti-corruption, it is the body responsible, inter alia: (i) ensure the existence in ACCIONA Energía of a Crime Prevention and Anti-Bribery Model (CPABM or Compliance Model); (ii) establish the values and guidelines for the conduct of collaborating employees and third parties that have relations with the Organisation; and (iii) promote 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.
- Audit and Sustainability Committee: in the area of ethics and anti-corruption, it is responsible for, among other functions, (i) approving and monitoring the Annual Plan for Supervision of the Operation of the CPABM proposed by the Ethics and Compliance Office (hereinafter, the Compliance Department); (ii) analysing the results of the reports on the operation and supervision of the Compliance Model; (iii) adopting decisions on the recommendations and action plans proposed as a result of the assessment of the design and effectiveness of the CPABM, as well as following up and supervising them and informing the Board of Directors of the results of the supervision carried out; (iv) supervising the responsibilities of Internal Audit and the Compliance Department in relation to the Compliance Model and ensuring their independence; and (v) supervising that ethics and compliance issues are considered in the selection, development, training and promotion processes and in internal communication with employees; (vi) ensuring that policies are consistent with the Code of Conduct.
- Management Team: in matters of ethics and anti-corruption, it is responsible for, among other functions, (i) directing and supporting all members of the Organisation in the exercise of their Compliance obligations, ensuring that they integrate them in the development of their activities in the Organisation; and (ii) certifying on an annual basis knowledge and acceptance of the Code of Conduct, Crime Prevention and Anti-Bribery Policy and Anti-Corruption Rules of Action, as well as any other rules that the Compliance Department may require due to the activities carried out.
- The Compliance Department is an autonomous area attached to the CEO, under the supervision of the Audit and Sustainability Committee and with regular reporting to the Management Committee. This Department is responsible at the operational level for the deployment, supervision, monitoring, review and continuous improvement of the CPABM. This Department coordinates with the rest of the areas that carry out prevention, detection and management of specific compliance risks in the ACCIONA Energía Group.
- The Ethics Channel Committee is the collegiate body responsible for ACCIONA Energía's Internal Reporting System, and is responsible for managing the Ethics Channel. The Organisation allows everyone to notify through this System any potential irregularities, 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.
- The Internal Audit Department is responsible for preparing, coordinating and executing the Annual Supervision Plan on the Compliance Model, reporting the results of the work carried out on it to the Audit and Sustainability Committee.



## Management of impacts, risks, and opportunities

ACCIONA Energía's Compliance Model aims to foster a culture of ethics and compliance in the Organisation, establishing parameters of conduct, as well as mechanisms to detect, prevent and, where appropriate, mitigate potential risks, including those related to the criminal sphere.

### Compliance Risk Analysis (IRO-1)

The risk analysis is based on the identification of the universe of criminal compliance risks and the analysis of the applicability of each of them to ACCIONA Energía, taking into account its specific context. For each offence deemed applicable:

- The areas/departments of ACCIONA Energía that carry out activities that, where applicable, could be linked to the commission of the offence are identified. For each non-applicable offence, the reason for its non-applicability is detailed.
- The level of exposure to each risk is analysed under probability and impact parameters.
- Controls are identified to mitigate identified risks and specific residual risk assessment criteria are applied.

The process of 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 Organisation has a Crime Prevention and Anti-Bribery Model (CPABM or Compliance Model) which is complemented by other specific compliance risk control models.

### Risk analysis and due diligence on third parties

The risk analysis and continuous improvement process of the Compliance Model is complemented by the identification, assessment and management of ethics and integrity risks in different key processes of the Group, including the evaluation process of business and investment opportunities and the analysis and monitoring of suppliers, partners and business consultants.

In relation to the latter process, ACCIONA Energía has internal regulations that set out the foundations for carrying out due diligence work on third parties: the Supply Chain Management Standard, the Supplier Guide and the Corporate Standard for the Selection of Partners and Contracting of Commercial Consultants.

⊕ For more information: [Supply chain controls](#)

On the other hand, the management of risks associated with partners and business consultants is based on the Dow Jones Risk Centre (DJRC) tool, which allows the company to obtain the necessary information on the identity of the third party, who manages and directs the Organisation, 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, amongst other information. The tool also allows to obtain a level of risk associated with 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 to be initiated. Depending on the level of risk obtained, different additional enhanced due diligence measures are put in place, including the submission of a responsible self-declaration on ethics and compliance or the submission of extended information request questionnaires.

In 2023, 172 third parties were registered.

## Policies and Commitments on Business Conduct (G1-1)

### Code of Conduct

ACCIONA Energía has a Code of Conduct, common to the entire ACCIONA Group, which establishes the principles, values and commitments that all directors, executives and employees of the ACCIONA Energía Group, as well as third parties related to it, must comply with and respect in the exercise of their activities. The Code of Conduct is the starting point for the development of corporate policies and rules on Compliance, which have a cross-cutting scope.

The Code of Conduct reflects ACCIONA Energía's commitment to carry out its activities in accordance with the legislation in force in each of the countries in which it operates, always based on the highest international standards, including the United Nations Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the principles of the United Nations Global Compact.

### Fight against corruption, bribery and money laundering

The specific policies established in ACCIONA Energía are set out in the Policy Book, within which, 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. These Policies were approved by the Board of Directors of ACCIONA Energía:

- **Anti-Corruption Policy:** establishes a clear and express position of ACCIONA Energía against any corrupt or criminal act, establishing the principles that all members of the ACCIONA Energía Group must follow in the interests of ethical, honest, upright and transparent performance.

Arising from the Anti-corruption Policy, ACCIONA Energía has Anti-Corruption Action Standards, which provide specific guidelines for avoiding inappropriate conduct and are applicable to and binding on all employees and groups associated with ACCIONA Energía (including agents, intermediaries, advisors, consultants and suppliers).

- **Crime Prevention and Anti-bribery Policy:** strengthens ACCIONA Energía 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 laws.
- **Antitrust Policy:** reinforces the rejection of these practices and sets out the applicable principles for action.

These guidelines 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 trade sanctions, antitrust compliance, prevention and management of conflicts of interest, recruitment and ACCIONA Energía Bonus.

The regulations deriving from these policies apply to all companies that are part of ACCIONA Energía Group, to all its employees and to third parties that are related to it.

## ACCIONA Energía's anti-corruption standards

ACCIONA Energía strictly prohibits:

1. Offering or accepting bribes to/from public officials or private individuals.
2. Offering or accepting payments to commence or accelerate processes or administrative procedures.
3. Offering or accepting gifts and hospitality to or from Civil Servants or any other third party in violation of these Anti-Corruption Action Standards.
4. Making on behalf of ACCIONA Energía contributions for political purposes.
5. Obtaining preferential treatment by using sponsorship or donation as a means for obtaining it.
6. Using the company's business relations and contacts in one's own benefit or that of a third party.
7. Establishing business relations with third parties without conducting the minimum due diligence required to know those third parties

The Code of Conduct, the Anti-corruption Regulations and the Crime Prevention and Anti-bribery Policy must necessarily be read and accepted by all employees.

## Ethics Channel

ACCIONA Energía has an Internal Reporting System that integrates the Ethics Channel, available for any individual to report to the Ethics Channel Committee any potential irregularities, breaches or misconduct related to ACCIONA'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 channels to make a communication through the Ethics Channel: (i) in writing, through a web form available at <https://canaletico.accionacom> 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 informant'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 can be used to submit anonymous communications. 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, as well as any act or omission that may be considered as retaliation.

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 ACCIONA Energía, with 80 % women and 20 % men.

Access to communications received through the Ethics Channel is restricted to the Ethics Channel Committee, whose functions include, among others:

- Facilitate a channel of communication for all the members of the Organisation, as well as third parties, not only to gather or provide information on the compliance with the applicable legislation, but also to manage the notifications and the queries received and thus facilitate the coordination of their resolution and diligent 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 reprisals against informants who report in good faith, impartiality and objectivity, and respect for the rights of all parties involved in the investigation.
- Review all communications received through the Ethics Channel and determine the methodology to be used in processing and investigating them.
- Report regularly to the Board of Directors, on any communications received and their resolution, through the Audit and Sustainability Committee.

The conclusions of each investigation are reported by the Ethics Channel Committee to the Audit and Sustainability Committee.

During 2023, on the occasion of the entry into force of the new Law 2/2023, of 20 February, regulating the

protection of persons who report regulatory infringements and the fight against corruption, improvements have been implemented to adapt ACCIONA Energía's Ethics Channel to the requirements established in the aforementioned Law. These changes have been substantiated in the approval, following the milestones set by this Law, of a **Policy for the operation of the Ethics Channel** and a Procedure for the Management of communications from the Ethics Channel, by ACCIONA Energía's governing body. Likewise, the dissemination and accessibility of the Ethics Channel web form and the updating of the contents and management parameters of the Ethics Channel management platform have been reinforced.

#### TYPE OF REPORTS THROUGH THE ETHICS CHANNEL

NOTIFICATION AREA	NUMBER OF BREACHES
Corruption or bribery	0
Discrimination or harassment	4
Customer privacy	0
Conflicts of interest	2
Money laundering or insider trading	0
Other work issues	1
Economic/financial affairs	1
Other	6

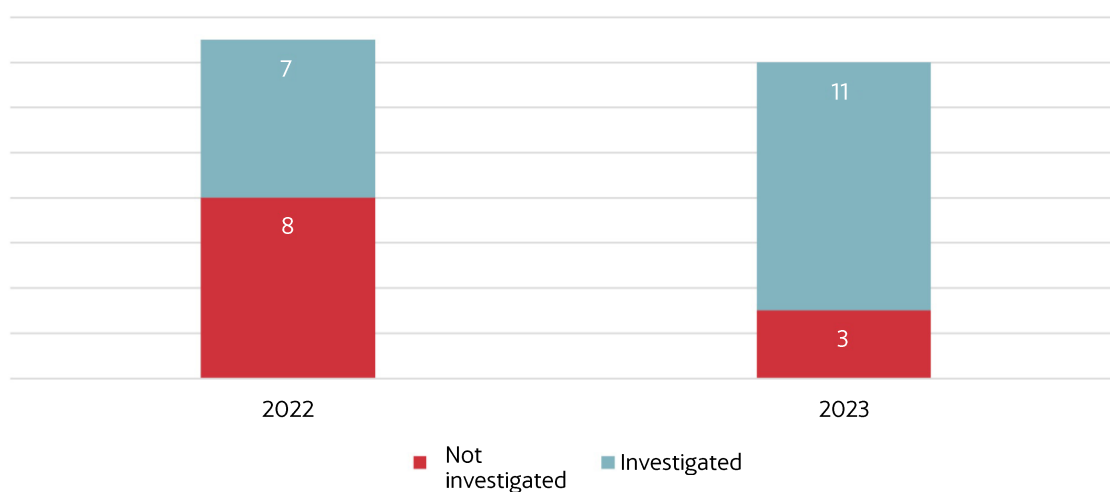
In the area of discrimination or harassment, 4 communications were received. All the files in this area have been investigated and in most cases such conduct as understood by doctrine and case-law has not been proven.

In addition, 1 communication has been received related to other labour issues, which has been investigated.

On the other hand, there were no communications 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.

As a result of the investigations carried out, the Ethics Channel Committee has proposed the adoption of various measures aimed at reinforcing the culture of ethics and compliance, such as training plans, coaching plans or dismissals.

## PROCESSING OF REPORTS IN 2023



In 2023, 14 reports were received through this channel. Of those, 11 cases were investigated, 3 by an external investigator and 8 by an internal investigator. The remaining notifications have been closed after it was determined that they were not subject to the Channel's analysis.

### Anti-money laundering measures

As for money laundering, all ACCIONA Energía employees 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 group monitors cash payments and due diligence procedures with suppliers and business partners that form part of the CPABM. In addition, a money laundering prevention and compliance course is available to all employees with a digital identity in the *Workday* learning module.

## Corruption and bribery prevention and detection (G1-3)

### Organisation and management model to prevent crimes and corruption

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. However, policies and control measures have been put into place to prevent or identify any possible cases of corruption and, in a broader sense, those related to criminal Compliance.

ACCIONA Energía's criminal compliance and anti-corruption risk management is based on a Crime Prevention and Anti-Bribery Model (CPABM or Compliance Model) that is certified under the ISO 37001 and UNE 19601 standards for Anti-Bribery and Criminal Compliance Management Systems. The purpose of this Compliance Model is to foster a culture of ethics and compliance in the Group, establishing parameters of conduct and mechanisms to detect, prevent and, where appropriate, mitigate potential risks, including criminal risks. The CPABM has been defined in accordance with national and international standards and is complemented by a set of specific policies, processes and controls.

The CPABM management work includes the identification, periodic assessment and monitoring of the criminal

compliance risks to which the ACCIONA Energía Group is exposed as a result of its activities. It also includes the identification, self-assessment, audit and ongoing review of the controls in place to mitigate the materialisation of these risks. In this regard, this Compliance Model includes specific control measures for criminal compliance, as well as other internal control systems deployed in the ACCIONA Energía Group, such as the Internal Control System for Financial Information (ICSFI), the Internal Control System for Social Safeguards (ICSSS) and the Tax Compliance Management System (TCMS).

The controls contemplated in the CPABM, as well as the main corporate regulations on Compliance, 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 ethics and integrity.

With regard to corruption risks that materialised during the year, none occurred in any of the jurisdictions in which ACCIONA Energía operates.

### Compliance communication and training

ACCIONA Energía has a training and communication programme managed by its own Compliance Department, the aim of which is to reinforce a culture of ethics and integrity in the ACCIONA Energía Group. This programme covers specific objectives in areas such as anti-corruption, competition, criminal risk prevention, punishment, among others, which is complemented with awareness-raising plans in other areas of Compliance coordinated with other areas of the Organisation.

In this regard, throughout 2023, one hundred and seventy-nine communication actions were carried out aimed at the management team and all ACCIONA Energía employees, sent via the intranet, e-mails, a newsletter and the ACCIONA CAMPUS App, on the Code of Conduct, Rules of Conduct on Anti-Corruption, Conflicts of Interest, donations, competition, gifts, punishments, Compliance tools and ethical culture, among others. In addition, the importance of the Ethics Channel was emphasised in general, highlighting the adaptation of the Channel to the new Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

The Compliance training programme includes a mandatory course for all employees on the Code of Conduct and two mandatory courses for executives and managers, "Fighting Corruption" and "The Good Way to Work", which provide information on anti-corruption principles and guidelines, management of Conflicts of Interest and the selection of partners and hiring of business consultants. In this regard, those persons associated with management positions, who are identified as being particularly exposed to criminal and anti-bribery risks, are required to complete the above-mentioned mandatory training.

Among the communication actions in Compliance carried out during the 2023 financial year, the following should be highlighted:

- The launch of a new communication initiative called "Compliance Agora". Specifically, two face-to-face sessions were held during the week of International Anti-Corruption Day, each lasting approximately 30 minutes, aimed at bringing all ACCIONA Group staff closer to relevant Compliance issues. In particular, during these first two sessions, issues relating to corruption and dealing with officials, as well as issues relating to the identification and management of Conflicts of Interest were discussed.
- The continuation of the "Break with Compliance" initiative, which aims to hold short face-to-face meetings with staff from different ranks and teams to discuss various Compliance issues.
- Conducting segmented communication and training sessions aimed



at members of the Board of Directors, Management Team, specific businesses, areas particularly exposed to risks and areas of special relevance in terms of internal control at both national and international level regarding various Compliance issues, such as Conflicts of Interest, third party due diligence processes, specific Compliance regulations, Code of Conduct, etc.

- Development of global executive courses on Compliance to raise awareness of the main corruption risks, referring to the specific laws in each country and to the Code of Conduct, internal standards and procedures and the Ethics Channel.

In addition, on an annual basis, a survey is sent to all members of the Organisation, on a global level, in order to ascertain their degree of understanding and familiarity with the internal regulations on ethics and compliance. This survey is also made available to employees through Interacciona and the Weekly Flashes sent to employees.

Through the Compliance Survey it is confirmed that 99 % of the employees are familiar with the Code of Conduct, 98 % with the Anti-corruption Action Policy and 89 % with the Ethics Channel Operating Policy.

**TRAINING PER COUNTRY ON THE CODE OF CONDUCT AND IN THE ANTI-CORRUPTION COURSES (NO. EMPLOYEES)**

COUNTRY	CODE OF CONDUCT	ANTI-CORRUPTION COURSE	“THE RIGHT WAY TO WORK” COURSE
Spain	239	115	145
Australia	55	10	12
Mexico	61	12	88
United States	185	15	12
Brazil	20	15	14
Canada	4	1	-
Chile	74	39	20
Peru	14	6	4
India	12	20	27
Other	25	13	19
<b>Total</b>	<b>689</b>	<b>246</b>	<b>341</b>

**Actions taken to strengthen an ethical corporate culture**

The main initiatives carried out in 2023 in this field were:

- Renewal of the double ISO 37001 and UNE 19601 certification for 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.
- Adaptation of the Internal Reporting System - which includes the Ethics Channel - to the requirements of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, with the approval and publication of the Ethics Channel Operating Policy and the Ethics Channel Communications Management Procedure, among other aspects.



- Update of the Conflicts of Interest management process.
- Strengthening of third party monitoring and analysis processes: suppliers, business partners, business consultants and customers.
- 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. In this regard, the Integrated Criminal Compliance and Anti-Bribery Management System Manuals applicable in Central America and LATAM have been developed.

## Compliance targets and metrics

The challenges for 2024 are:

- Complete 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 at national level.
- 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 continuous training in Compliance matters for the different members of ACCIONA Energía's Ethics and Compliance Office (Compliance Department), as well as for the local Compliance Officers located in the different jurisdictions, given the growing volume of Compliance obligations.
- Strengthen the training catalogue aimed at members of the ACCIONA Energía Group in the area of criminal compliance at both national and international level.
- Review of the body of Group-wide standards in the field of ethics and integrity.

## Incidents of corruption or bribery (G1-4)

There were no incidents of corruption and bribery in any of the jurisdictions in which ACCIONA Energía operates during the 2023 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.



## Compliance Agora

On the occasion of International Anti-Corruption Day, two communication sessions were held in September for all staff located on the ACCIONA Campus (Madrid) in an innovative format. These sessions consisted of face-to-face meetings with groups of approximately 20-25 people to informally and practically discuss specific compliance issues. This year, these sessions have focused on Corruption, Dealing with Public Officials and Conflicts of Interest. These sessions were given by the heads of the ACCIONA Group's various Compliance Divisions and resulted in a very satisfactory open dialogue where staff were free to raise all their concerns

## RELATIONS WITH PUBLIC ADMINISTRATIONS AND REGULATORY BODIES (G1-5)

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.

### 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.

Contributions to foundations and non-profit organisations are made with suitable analysis of the receiving institutions, and also their reputation and financial transparency.

In 2023, ACCIONA Energía contributed €1,077,273 to associations or organisations for promoting sustainability and trade associations, amongst others.

ORGANISATIONS	CONTRIBUTION	INSTITUTIONS RECEIVING THE MAIN CONTRIBUTIONS (IN ORDER)
1. Lobbying, interest representation or similar	€259.632	European Australia Business Council, Universidad Politécnica de Madrid, Pontificia Universidad Católica de Chile, Innoenergy, Advance Energy United, AERO
2. Trade associations	€817.641	Amercian Clean Power Associations (ACPA), Wind Europe, Global Wind Energy Council (GWEC), Clean Energy Council Australia, CanREA, AEE- Asociación Empresarial Eólica (Spanish Wind Energy Association)
<b>TOTAL</b>	<b>€1.077.273</b>	

The largest contributions have been:

**1.- American Clean Power Association (ACPA): Amount: €213.005**

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 dominant energy source in the United States.

**2.- Wind Europe - Amount: €72.870**

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.- 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 Register<sup>11</sup>, where the interests it pursues, who defends them and the related budget are published in a transparent manner.

In 2023, 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:

- > Promoting renewable hydrogen.
- > 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.
- > 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 vis-à-vis the Ministry and the Autonomous Communities.
- > Process to access and connect renewable plants. Development of modification of regulations (extension of milestones to maintain permits). Monitoring also of grid access regulations for demand, important for H2 projects and for batteries/pumping.
- > Promotion and regulatory development of new flexibility resources (storage, demand management, aggregation, electric car) and new renewable generation technologies (floating photovoltaic, on channels and wind turbine tower).

<sup>11</sup> <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=451019811573-55>

- > Offers of financial aid for renewable installations, self-consumption, storage (batteries and hydraulic pumping) and renewable hydrogen.
- > Redesign of the electric market and measures that affect the payment of renewable energy (reduction of payments for infra-marginal technologies). New European market design regulations approved.
- > European legislation to support renewables and the value chain: new Renewables Directive (RED III), European Green Pact Industrial Plan.
- > European decarbonisation legislation (ETS, CBAM) and its application to renewable H2.
- > Adjustment of the Spanish and EU regulations on power generation with biomass.
- > Start of the process for the implementation of a capacity mechanism in Spain, with an expected call date in 2024. 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). The company participates actively with them and holds positions of responsibility on their management bodies.

## CYBERSECURITY MANAGEMENT

Cybersecurity management is centralised in the ACCIONA Group, serving all Group companies, including ACCIONA Energía, which actively participates in the management and governance of cybersecurity.

ACCIONA Group has an Information Security Steering Committee made up of the Chief Financial and Sustainability Officer, the Corporate Security Manager, the Technology and Processes Manager, the Human Resources Manager, the Chief Operation Officer (COO) of ACCIONA Energía, the Corporate Resources Manager of ACCIONA Infraestructuras and ACCIONA 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. The cybersecurity framework of the parent company ACCIONA is aligned with various international standards, such as NIST CSF and ISO 27001, and defines all the control objectives and controls in the area of cybersecurity.

ACCIONA Group has an ISO 27001 certified information security management system with the following scope:

- The security services that support the operations of the businesses, including ACCIONA Energía, and which are provided from the head offices in Madrid and Australia.
- The Information and Communication Technology (ICT) services that support the operations of the businesses, including ACCIONA Energía, and which are provided from the central offices in Madrid.

ACCIONA Group has a business continuity management system, certified in ISO 22301, with the scope "Information technology and communications processes carried out from the ACCIONA CAMPUS (Madrid)". ACCIONA Energía is included in this scope.

The Group also carries out contingency and incident plans for various information security risks. These plans are reviewed at least annually, depending on the plan.

ACCIONA Energía has a Cybersecurity Policy and an employee awareness and training plan, in addition to procedures and mechanisms so that any worker may report an actual or suspected security incident.

During 2023, there were no cybersecurity incidents that impacted the operations of ACCIONA Group, including ACCIONA Energía.

## Sustainable Supply Chain (G1-2)

### SUSTAINABLE 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.

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.

### SUPPLY CHAIN MANAGEMENT STRATEGY

ACCIONA Energía is committed to leading the development, knowledge and control of its supply chain, focusing particularly on social responsibility, ethics and transparency of the procurement process. Market requirements and regulations create the need for traceability throughout the supply chain.

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.

In the 2023 financial year, the Instruction on registration, approval and evaluation of suppliers has been updated, giving rise to a new *Supplier Management Guide* for ACCIONA Energía, which incorporates the new risk map based on scores obtained from the GoSupply tool, managed by third parties. The contents of the contracting conditions to be used in tenders in which suppliers participate have also been revised on an ongoing basis, incorporating a new clause due to the Non-Reusable Plastic Packaging Tax regulations.

The Internal Code of Conduct Compliance Unit remained operational in 2023, in order to control intra-group commercial operations and ensure compliance with issues relating to fair market competition.

Improvements have also been made to the Contractor Profile web portal (<https://contractorprofile.acciona-energia.com>)- introduced in 2021 for the European Union and extended to global contracting in 2023 - which promotes greater transparency through the publication of objective and measurable criteria that ACCIONA

Energía suppliers must meet, including sustainability aspects.

The stipulation that the ESG score will account for 10 % of the evaluation of the award in tenders with a budget of over €400,000 has also been maintained, with a specific Occupational Risk Prevention score of 20 % applied in the case of service contracts.

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.



### **Sustainable logistics in emission reduction projects, United States**

Within the framework of the objectives of decarbonisation of the supply chain, and taking advantage of the potential of rail in the USA, it has been decided to transfer components by rail instead of road for the *High Point* and *Union* projects, specifically between the port of Norfolk and Chicago, avoiding the emission of 6,460 tonnes of CO<sub>2</sub>.

Finally, 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 at their disposal courses aimed at promoting sustainability, bullying awareness, cultural diversity and human rights training, etc. with a total of 269 courses taken by 82 % 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.

## MANAGING SUPPLY CHAIN IMPACTS, RISKS AND OPPORTUNITIES

### Risks in ACCIONA Energía's supply chain

ACCIONA Energía recognises three types of risk associated with procurement processes:

- Operating risk, such as interruptions in supplies.
- Compliance, sustainability, environmental and social risk.
- Risks due to the supply of goods or critical services.

For each of these risks, specific preventive control mechanisms -periodically updated and configured- are developed that help minimise the probability of occurrence.

### Supply chain controls

The Risk map is ACCIONA's primary supply chain risk control and management tool that was implemented in PROCUR-e.

Since 2011, ACCIONA Energía had outsourced the validation of supplier information to Repro-Achilles for strategic suppliers.

Since 2022, ACCIONA Energía has been incorporating GoSupply as a platform for validating and calculating the risk map of all suppliers regardless of their level of contracting, so that knowledge of the supply chain is much broader in different areas and, especially in ESG. In 2023, having verified that this system improves the control of the supply chain with respect to those previously mentioned, the countries in which ACCIONA Energía operates and in which its implementation was pending have been incorporated into this platform: India, Mexico, Chile, Portugal, Italy, Croatia, Poland and Spain, achieving global consolidation of the system.

This change entails the incorporation of a platform for ACCIONA Energía's specific requirements, in strict compliance with international standards. GoSupply is an international external platform specialising in supply chain risk management. 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.

Currently, the scores that form part of the risk map according to the supplier's strategic level are: financial, compliance, cybersecurity (if applicable), ESG, operational and geopolitical.

The company takes responsibility for identifying, preventing, mitigating and responding to the negative impact of its activities on human rights, quality of employment, integrity and anti-corruption policies, environment and ecological impact through the ESG Rating.

The 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. ACCIONA Energía supervises its strategic suppliers in this area, either because they are recurrent or because they work in a risk country.

Geopolitical risk is formed from various indices extracted from Maplecroft and GoSupply such as corruption,



human rights, environmental legislation, labour conditions, armed conflicts, socio-economic status, credit rating and tax haven.

Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as risks of any kind increase.

The levels are:

1. The supplier must accept the Group's **Self-Declaration** which includes its commitment to the United Nations Global Compact, ACCIONA Energía's Ethical Principles for Suppliers and Contractors, ACCIONA Energía Policies, Personal Data Protection, as well as ACCIONA Energía's minimum requirements in terms of integrity, quality, environment, human rights, health and safety. This self-declaration is accepted by all suppliers when accessing GoSupply and is accessible and published within the Contractor Profile (<https://contractorprofile.acciona-energia.com>) for consultation prior to registration.
2. **Self-assessment questionnaire** which allows ACCIONA Energía to calculate the variables or scorings in different areas and is essential to be able to bid for tenders.
3. Strategic suppliers (awarded more than €400,000 in the previous twelve months), require additional control: **approval**, which verifies compliance with international standards on human rights, supplier integrity, financial solvency, up-to-date tax and social security payments, etc. The minimum requirements for strategic suppliers are:

Geopolitical risk	Low or Medium
Compliance	> 60 points
ESG	> 40 points

4. The highest level is required for strategic suppliers in risk countries for which **audits** for their approval are carried out by third parties using the ACCIONA Energía Audit Protocol.
5. Audits have also been established for **tier 2** suppliers of core equipment with contracts exceeding €5M. They 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.
6. In case the supply of goods or service is considered as critical, as indicated in the section of the documentation regarding the technical qualification of suppliers within the Contractor Profile (<https://contractorprofile.acciona-energia.com>), the supplier must pass a qualification process carried out through GoSupply and supervised by the QHSE department.

Finally, ACCIONA Energía's No Go policies are used at all levels, regardless of their criticality. Non-compliance by any supplier will result in the supplier being blocked from working for ACCIONA Energía.

## No-Go Suppliers

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. ACCIONA Energía has met its 2023 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 2023, there was a history of 33 No-Go suppliers. During the year, 5 No-Go suppliers exited No-Go status and a total of 6 No-Go suppliers entered No-Go status, ending the year with a total of 34 No-Go suppliers. Removal of 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

## Supplier performance assessment

ACCIONA Energía carries out various types of supplier assessment prior to supply or service, designed to verify compliance with company standards and assess supplier performance.

Prior to entering a contract, ACCIONA Energía assesses potential risk and conducts a technical evaluation of critical services/supplies. on the basis of which a decision is made on the supplier's suitability for carrying out the work, and their performance is monitored until the end of the project. During 2023, this assessment has been implemented in the GoSupply tool, to start being used in 2024.

On the other hand, at the end of the contract execution phase, the departments requesting the service/supply carry out an assessment of 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. During the course of 2023 925 assessments were carried out. 92 % of those evaluations were type A or B (very recommendable or recommendable supplier).

A new evaluation model has been designed during 2023 to streamline the process and will be implemented in 2024 as part of the systems evolution planned for that year.

## Audits

In addition to the two assessments mentioned above, ACCIONA Energía carries out audits by third parties (Achilles and GoSupply) to verify the ESG assessment of its suppliers.

These monitoring audits have been carried out since 2013 and in 2023, 95 were conducted, 83 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 and India).

In accordance with ACCIONA Energía's audit protocol, any Serious Non-Conformities identified in these audits, an improvement plan must be established until they are settled.

Since 2018, ACCIONA Energía has also carried out audits of tier 2 suppliers to safeguard its supply chain and mitigate risk. By the end of 2023, audits have been carried out on the 12 *tier 2s* of a strategic supplier of large components in the following countries:

COUNTRY	NO. AUDITS	%
1,260	11	92 %
Vietnam	1	8 %

It is also worth mentioning that a new *tier 2* audit campaign of three other strategic cable and transformer suppliers was launched at the end of 2023, to be carried out and reported on in 2024.

## Resolution of Serious Non-Conformities

ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. In the event that the 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.

Focussing on the Non-Conformities of the 95 suppliers audited in 2023, the following is worth noting:

- 67 % had 0 SNCs.
- The remaining 33 % signed up for the various action plans. Of this percentage, 21 % have totally resolved their SNCs and the rest have not yet reached the deadline.

Only 1 supplier of those audited in the year 2023 has passed to No-Go status for not closing all its Serious Non-conformities on time.

With regard to tier 1 and tier 2 suppliers from at-risk countries, 20 suppliers from China and India were audited:

- 50 % of the audited suppliers had no Serious Non-Conformities.
- None of the identified Serious Non-Conformities were related to human rights. All of the cases identified were related to environment, quality, occupational risk prevention and processes.

ACCIONA Energía is aware that insisting on the resolution of the Non-Conformities detected during audits is the correct path to help its distributors to improve as companies and mitigate the risks associated with the supply chain and contributes to increasing performance and generating shared value.

The GoSupply platform incorporates an audit module, in addition to the general questionnaire, to facilitate the monitoring of the resolution of non-conformities, and another module for the technical rating of suppliers (QHSE). This provides a more comprehensive overview by centralising all information on a single platform.

## Sector-specific characteristics of the supply chain

The group's purchase categories with a higher volume of expenditure are wind turbine components, photovoltaic panels and structures, and the 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.

### DISTRIBUTION OF SUPPLIERS BY TYPE

	TOTAL NO.	STRATEGIC	NATIONAL/ LOCAL	INTERNATIONAL
Suppliers	3,409	318	3,213	330

### Strategic suppliers

A strategic supplier is defined as being one whose annual commercial relationship worth more than €400,000. 9.33 % of the supply chain has been estimated as falling within this category, accounting for 91.65 % of contracting.

### National/Local suppliers

Working with national suppliers has a positive effect on the economic development of the communities and minimises operating risk as delivery and execution times are reduced. 91 % of the companies or means of distribution contracted are national and account for 68.01 % of the expense in 2023.

### 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 9 % of suppliers and 31.99 % of expenditure in 2023.

## Ethics for suppliers and contractors

ACCIONA Energía extends communicating the company's ethical principles to its supply chain to be a key aspect for consolidating a network of suppliers, contractors and collaborators in line with its corporate values. This communication takes place through various channels:

- **Publication of the "Responsible Self-Declaration"** in the Contractor Profile, which includes the recommendation to adhere to the United Nations Global Compact, the code of conduct and the ethical principles for suppliers, contractors and collaborators of ACCIONA, which promote that they carry out their activity in accordance with the best sustainability practices, complying with the highest international standards in terms of transparency and business ethics, human rights, health and safety, quality and the environment.
- **Acceptance of** the above-mentioned "Responsible self-declaration" document from the supplier, which is essential before entering into a business relationship with the company.
- Through orders, contracts and tender specifications, which include **clauses** relating to: ethical principles for suppliers, sustainable procurement, confidentiality, information security and data protection, amongst others. 88.3 % of orders included these clauses (representing 99.68 % of the contract amount), whilst the remaining 11.70 % are orders for spare parts or the movement of materials between ACCIONA Energía companies.

## Main actions carried out for the management of the supply chain

These are the main actions carried out in relation to supply chain management systems:

- **Implementation of GoSupply** as an analysis tool adapted to business risk.
- **Improvements to the Contractor Profile** (<https://contractorprofile.acciona-energia.com>) for global use, including access for suppliers at Elementary level (suppliers who voluntarily sign up to work with ACCIONA Energía, but have not been invited to register in the system).
- **Visibility and insights.** Within the GoSupply profile, suppliers have visibility of their scores, they can compare themselves with the average both with ACCIONA Energía suppliers and with suppliers in their own category and/or country. In addition, they receive insights into improvement points and positive points in the different scores. This motivates the supplier to seek improvement over its competitors.
- Creation and implementation of an **improvement plan** programme in GoSupply for those suppliers that do not meet the minimum required score in ESG scoring, through which the supplier is invited to carry out an improvement plan to develop and improve their ESG scoring.

The entire supply process has been audited by an external entity (Bureau Veritas) for the validity of the ISO 9001 management system certification, passing with 0 NCs. Observations and opportunities for improvement that arise during these reviews are analysed and considered with the aim of maintaining continuous process improvement.



## Million Tree Project. Economic revitalisation of the Maleku indigenous community, Costa Rica

Facing economic challenges in the Maleku indigenous community of Guanacaste, Costa Rica, ACCIONA has launched the "Million Tree Project" as a comprehensive solution. This project focuses on reforestation with indigenous trees, not only to restore the ecosystem, but also to boost the local economy. Through the planting of fruit trees and bushes, families in the community are offered an opportunity to generate income through the sale of fruit. ACCIONA also provides advice on the maintenance and production of the fruit, as well as on the creation of added value for its products. This multi-faceted approach not only generates employment and livelihoods for the Maleku community, but also contributes significantly to environmental conservation.

## OBJECTIVES AND METRICS

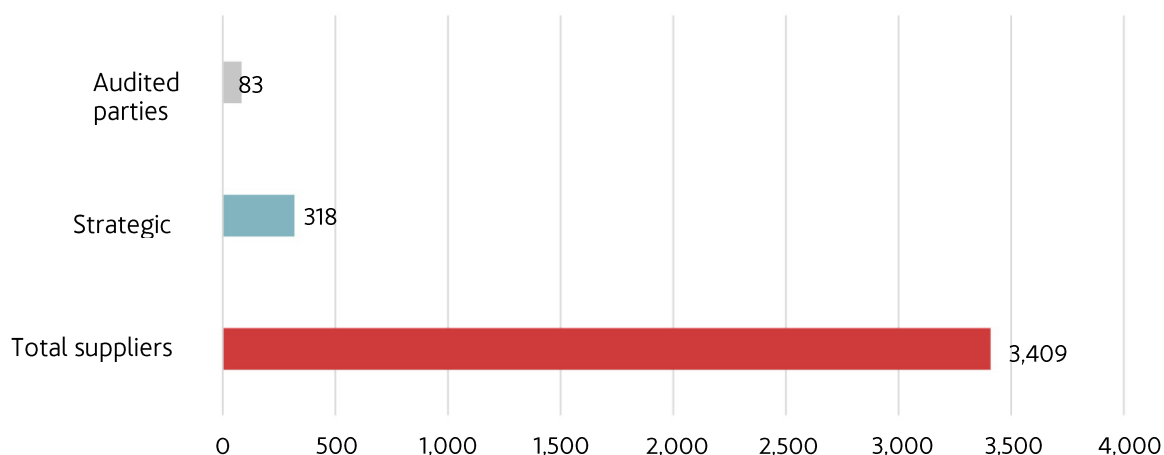
The following SMP-related challenges are worth highlighting:

- Strategic suppliers: 98 % of them must be certified, and 70 % of them must have ESG scoring in the systems. Both are 100 % compliant
- Audits: audit a minimum of 75 ESG suppliers, follow up findings with Due Diligence or Improvement Plan with a minimum of 90 %. 83 Tier 1 suppliers and 12 Tier 2 suppliers have been audited. This represents more than 100 % achievement of the target.
- Reduction of the carbon footprint: in purchasing categories that generate 50 % emissions. In sections sustainable product sourcing and success stories are detailed.

## Challenges for 2024 in supply chain management

1. Continue to promote 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.
2. Maintain audits of tier 2 suppliers for tier 1 equipment supply contracts worth more than €5M, supervising at least 80 % of the supply.
3. Review of sustainable Procurement criteria and, if possible, system automation to facilitate their control.
4. Automation of supplier performance appraisal.

## Supplier classification



## Supply of sustainable products

ACCIONA Energía has maintained the criteria of the *Sustainable Purchasing Guide*, with sustainable purchases made in 2023 amounting to 44,646,115.72 euros, broken down as follows:

TYPE OF SUSTAINABLE PURCHASE	NO. OF SUPPLIERS	AMOUNT EUR
Social purchase	12	1,921,518.84
Carbon neutral	11	3,836,813.86
Herbaceous	113	11,030,897.95
Reconditioned material	107	27,612,260.69
Environmental protection	4	244,624.38
<b>General total</b>	<b>249</b>	<b>44,646,115.72</b>

In 2023, work has been carried out to define new sustainable purchasing criteria based on eco-labels, although it has not been possible to automate them in the company's tools to facilitate their control. New criteria will be addressed in 2024 while studying the feasibility of their implementation in the systems.

In addition, with regard to decarbonisation, agreements have been reached with some suppliers, such as two Chinese suppliers of power transformers and cables, to work together to reduce emissions by promoting the use of renewable energies, the use of vegetable oils and recycled materials.

Rail has also been used instead of road transport, avoiding the emission of 6,460 tonnes of CO<sub>2</sub>, in projects under construction in the United States. (see case study)



## Continuous improvement with suppliers

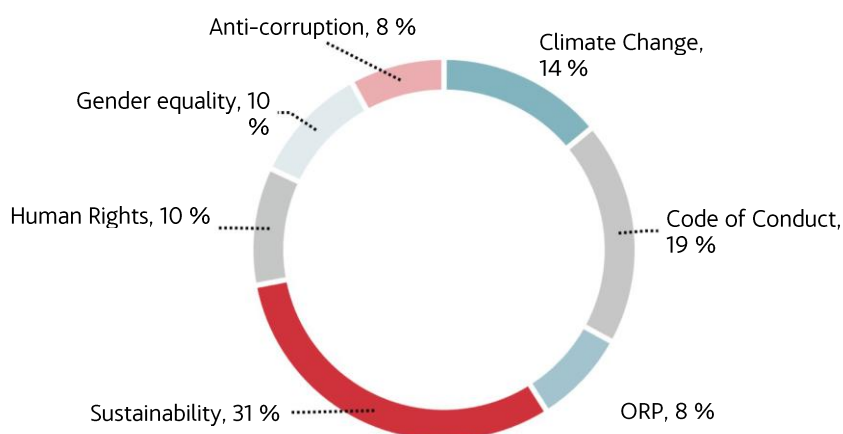
### Training and improvement plans for suppliers

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, 15 suppliers attended 51 courses out of those offered on the campus. The courses that have generated the most interest are those involving Sustainability, 31 % of the total courses given.

A *Compliance Day* was held with Mexican suppliers to explain some of ACCIONA's policies, such as antitrust, crime prevention and anti-bribery, anti-corruption, code of conduct and conflicts of interest.

In addition, as a result of audit findings or low ESG scoring levels, improvement plans will be proposed in 2024 to strategic suppliers that do not meet the minimum requirements, as indicated above. This will allow them to improve their scorings and, therefore, reduce supply chain risks.

#### TRAINING OF SUPPLIERS IN 2022



### Communication with suppliers

Suppliers have two-way channels to raise matters in relation to their commercial relationship with ACCIONA Energía:

[Proveedores.Energia@acciona.es](mailto:Proveedores.Energia@acciona.es), and [Suppliers.Energy@acciona.com](mailto:Suppliers.Energy@acciona.com)

Likewise, suppliers can make use of the Ethics Channel to report any irregular practice detected, which will be duly analysed by the company.

<https://canaletico.acciona.com/>

2023 saw the fourth edition of the ACCIONA Energía award for suppliers in projects in the construction phase, which recognises excellent performance evaluation, active solution seeking, competitiveness of products and/or services, and collaboration in management and innovation. These awards aim to encourage the commitment and continuous improvement of its suppliers by recognising their contribution to the excellence of the projects in which they participate. In this case the award went to a service provider from Bulgaria, which was involved in the construction of the Extremadura plant.



### **Aldoga Solar Power Plant, Australia**

For the civil works of the Aldoga solar plant in Australia, a contract for AUD 3.1 million was signed with an indigenous company, despite its higher bid. This decision was made on the basis of its outstanding sustainability score and its verification by Supply Nation, a recognised Australian body.



### **Dry cleaning of photovoltaic modules for PV USYA, Chile**

At ACCIONA Energía's Usya PV plant, located in the Antofagasta region of Chile, a critical need was identified to optimise the maintenance of the photovoltaic modules. The challenge was to implement a cleaning method that was both operationally efficient and environmentally friendly. Traditionally, this task involved intensive use of water resources, approximately 500,000 litres per cleaning, leading to environmental and sustainability concerns.

ACCIONA Energía tackled this problem by applying a dry cleaning method, characterised by its technological innovation and efficiency. This system integrates semi-autonomous electric brushes together with an autonomous robot, facilitating the removal of accumulated particles on the panels without resorting to water. This approach not only optimised the cleanliness of the panels, maintaining their performance and extending their service life, but also represented a significant step forward in minimising environmental impact.

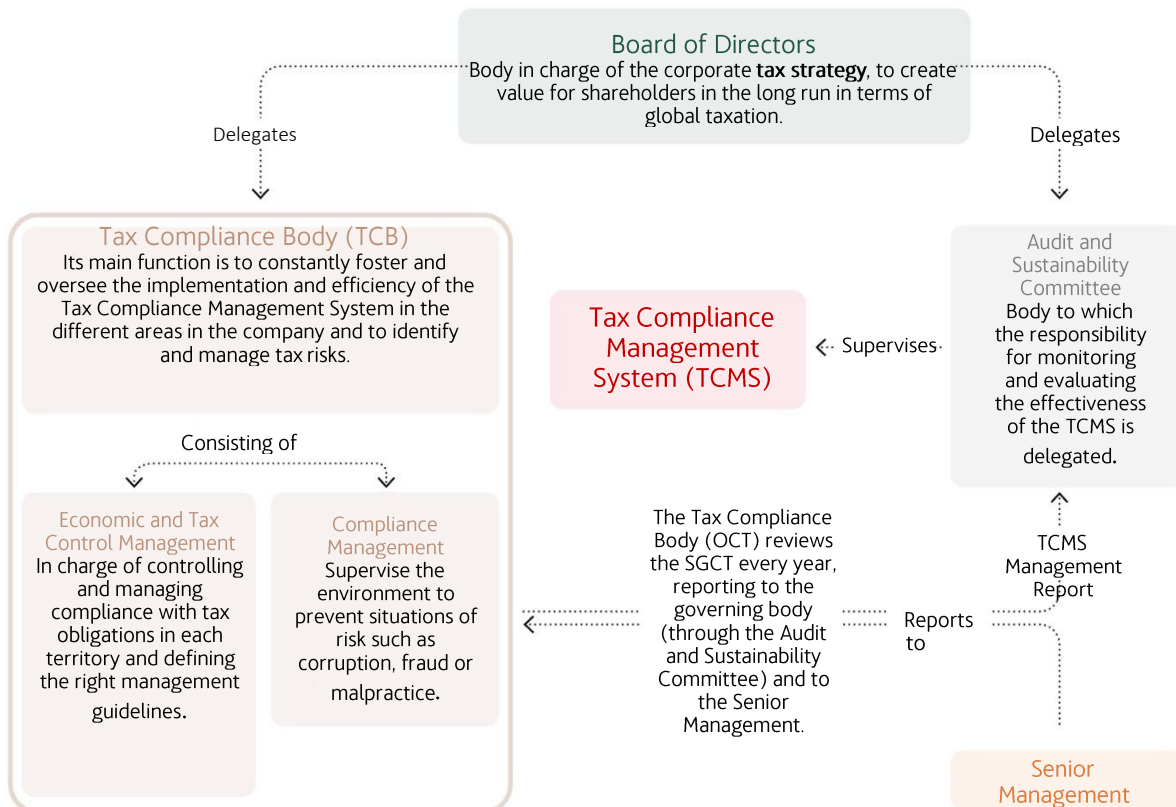
## RESPONSIBLE TAXATION

### 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.

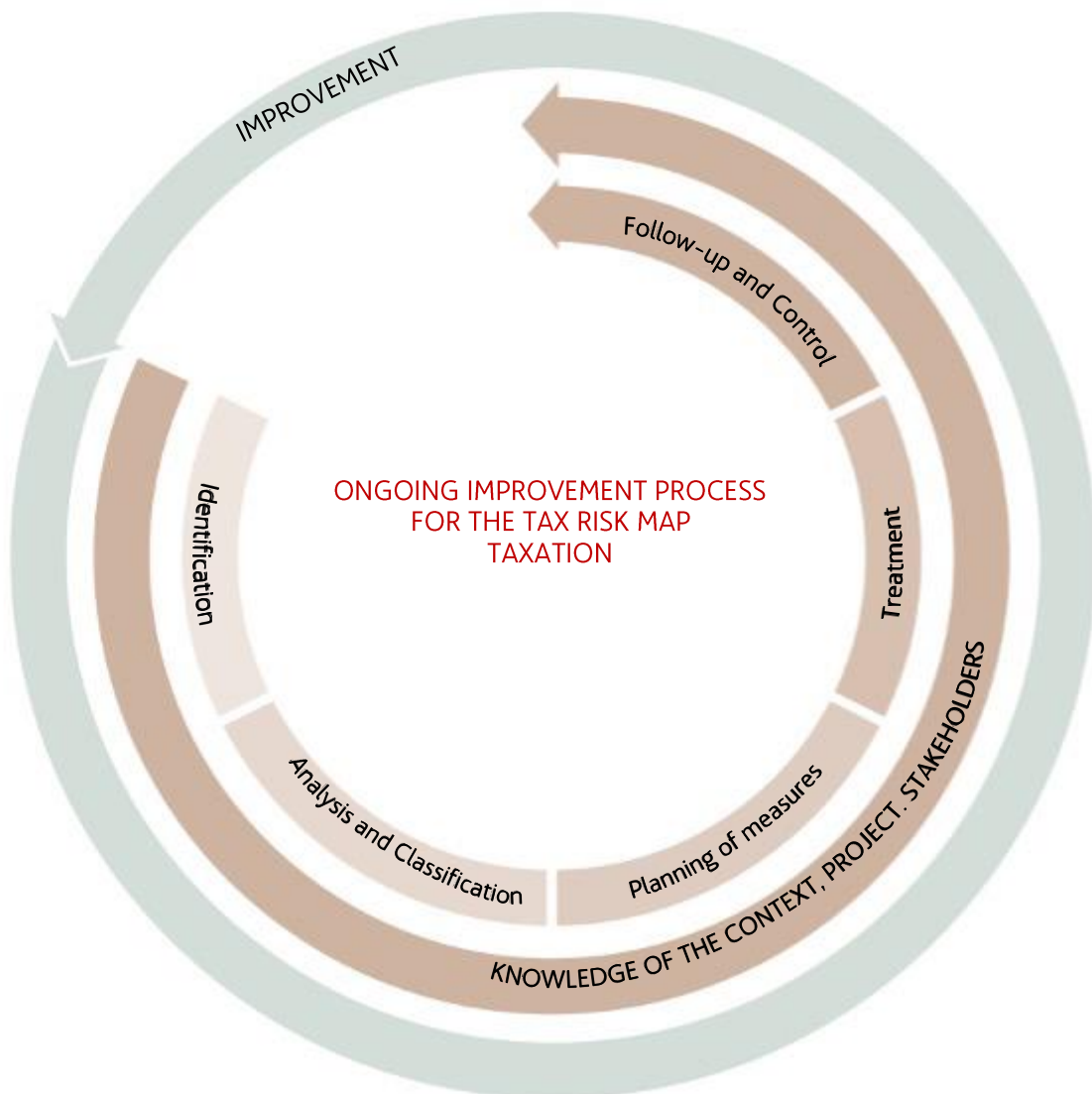


## Detection and assessment of risks and opportunities

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.

It has also 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. The mailbox is available to the company's employees, suppliers and contractors.

## 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 2022	Grants (€M)	Footnote explaining effective rate due	Footnote explaining effective rate paid
Spain	2,426	808	205	209	1,876	0	(9)	(9)
Mexico	277	59	20	40	276	0	(5) (9)	(5) (9)
Portugal	181	26	5	12	29	0	(6)	(4) (6)
South Africa	59	21	7	7	58	0	(5) (7)	(2) (5)
Italy	28	8	5	22	20	0	(5)	(5)
Poland	27	7	1	1	19	0	(6)	(6)
United States	130	-2	0	0	254	0	(9)	(2)
Peru	1	-7	-3	0	24	0	(8)	(2)
France	24	-12	-3	0	60	0	(4)	(2)
Australia	56	-60	-16	-0	208	0	(8)	(2)
Chile	248	-68	-18	9	170	0	(7) (9)	(2) (9)
Others	90	-6	6	7	105	0	N/A	N/A
<b>Total</b>	<b>3,547</b>	<b>776</b>	<b>209</b>	<b>306</b>	<b>3,099</b>	<b>0</b>		

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).                  | 7- Non-capitalisation (recording) of tax credits.                      |
| 2- Tax losses in the year.  | 8- Capitalisation (recording) of tax credits (BIN).                    |
| 3- Application of unrecorded tax credits.                                     | 9- Non-deductible expenses and adjustment for inflation.               |
| 4- Allocation of consolidation vs. local accounts (Corporation Tax payments). | 10- Application of tax credits.  |
| 5- Tax rate for Corporation Tax higher than in Spain                          | 11- Deferral for accelerated depreciation / unrestricted depreciation. |
| 6- Tax rate for Corporation Tax lower than in Spain                           | 12- Non-application of the tax consolidation method.                   |

As of 31 December 2023, the company has received neither capital grants nor operating subsidies.

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.



# 06

## SUSTAINABLE FINANCES

## Sustainable finance




From 2021, ACCIONA Energía will strive to offer the most economically efficient solutions while generating a positive impact on the environment and the local communities where it operates, making a significant contribution to the United Nations 2030 Agenda for Sustainable Development.

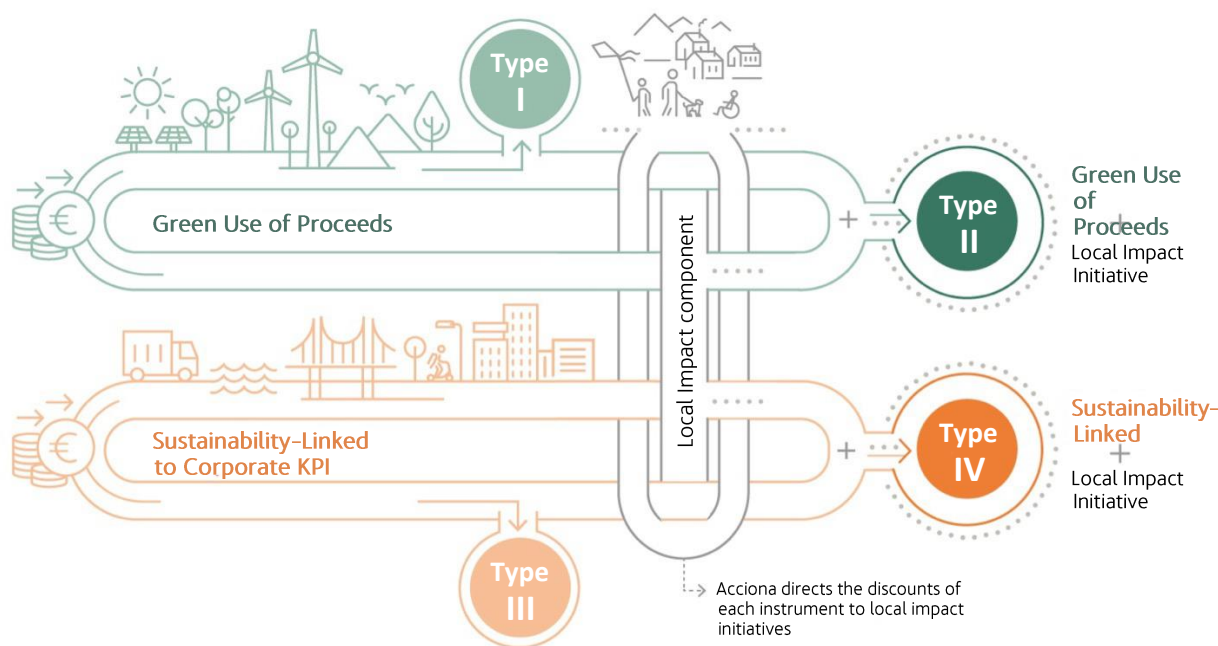
In this regard, 2023 marked a major step forward in ACCIONA and ACCIONA Energía's financing strategy with the publication and consolidation of the Sustainable Impact Financing Framework (hereinafter, the "Sustainable Financing Framework" or "Framework") of both companies. This framework covers both green finance and sustainability-linked 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 towards the market, a number of clear rules have been included in the Sustainable Finance Framework to give greater comfort to investors and financial institutions.

## SUSTAINABLE IMPACT FINANCING FRAMEWORK

The Sustainable Financing Framework replaced the previously published financing framework.

Under this Framework, ACCIONA Energía 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 these 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 at the local level.
- 
**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 at corporate level.
- 
**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 result, a large part of the company's debt volume is categorised as green or linked to sustainable commitments: at year-end 2023, 98 % of gross corporate debt is green (91 %) or sustainable (7 %).








## GREEN AND SUSTAINABLE FINANCING TRANSACTIONS

TYPE OF FUNDING	LIVE INSTRUMENTS (#)	OPERATIONS CLOSED IN 2023 (#)	TOTAL AMOUNT (€M)*
Green finance (type I)	7	4	2,307
Green Finance with Local Impact (Type II)	3	1	1,671
Corporate funding with sustainable commitments (type III)	0	0	0
Corporate financing with sustainable commitments, with Local Impact (type IV)	2	0	950
<b>Total</b>	<b>12</b>	<b>5</b>	<b>4,928</b>

\* Total amount of instruments outstanding at year-end 2023. For operations in currencies other than the Euro, the amount posted is that according to the exchange rate in force at year-end 2023.

## ESG RATINGS

ACCIONA Energía has been regularly assessed in terms of sustainability by different ESG analysts. As of year-end 2023, the current ratings of the main ratings are as follows:

RATING AGENCY	RATING SCALE	SCORE 2023	SCORE 2022	IND AVERAGE	INDUSTRY
 S&P Global	0 to 100	87	90	34	Elec. Utilities
 CDP	D- a A	A	A	C	Elec. Utilities
 SUSTAINALYTICS	100 to 0	10.7 Low Risk	10.7 Low Risk	25 Med Risk	Renewable Power
 MSCI	CCC to AAA	AAA	No rating	A	Utilities
 ISS ESG	D- to A+	A- Prime	No rating	B	Renewable Electricity
 ecovadis	0 to 100	82	73	Not applicable	Electricity, gas, steam and air-conditioning supply
 FTSE4Good	0 to 5	4.1	No rating	2.7	Utilities

## **ACCIONA is listed on the Dow Jones Sustainability Europe Index**





The index comprises the global leaders in sustainability identified by S&P Global through its Corporate Sustainability Assessment or CSA. It represents the top 20 % of the 600 biggest companies on the S&P Global Broad Market Index, according to economic, environmental and social criteria. ACCIONA Energía will be included in this index from 18 December 2023.

Consequently, S&P Global has included ACCIONA Energía in the top 5 % in the Sustainability Yearbook Award 2023, a distinction that places it on the podium of the best utility companies in the world in terms of sustainability.

## **ACCIONA Energía recognised as "Top Rated ESG Company" by industry and region**

Sustainalytics recognises ACCIONA Energía as one of the companies that best manages ESG risks, compared to companies in its industry and region. The company, with an ESG Risk Rating score of 10.7 (Low), is among the companies best able to manage its environmental, social and governance risks.

PRESENCE IN SUSTAINABILITY INDEXES

SUPPLIER	NAME OF THE INDEX
	Bloomberg World Energy Alternative Source Index
	Bloomberg World Energy Index
	Bloomberg ESG Coverage Index
	Bloomberg ESG Data Index
	Bloomberg World Large Mid Energy Select Price Return Index
	Solactive Wind Energy Index
	Solactive EU Utilities Index PR
	Solactive ISS ESG Global Markets Net Zero Pathway Custom Index NTR
	Solactive Candriam Factors Sustainable Europe Equity Index
	Euronext Low Carbon 300 World PAB NR
	Euronext Low Carbon 100 Eurozone PAB NR
	JPM iDex EU - Decarbonization Index
	MSCI World Custom ESG Climate Series A Net in EUR MSCI EMU SRI S-Series PAB 5 % Capped Index
Others	BITA Impak Europe EU Taxonomy WilderHill Hydrogen Economy Index (USD NTR) WilderHill Wind Energy Index (USD NTR) WilderHill New Energy Global Innovation Index USD Net TR

PRESENCE IN RANKINGS AND OTHER SUSTAINABILITY ACKNOWLEDGEMENTS

RECOGNITION	ORGANISATION	POSITION	DESCRIPTION
New Energy Top 100 Green Utilities	Energy Intelligence	1st utility in the world	For the ninth year in a row, ACCIONA Energía has validated its position as the world's "greenest" electric utility company.
SE Index Member	Standard Ethics	E+ 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.
2023 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.

TRANSPARENCY AND COMMUNICATION WITH INVESTORS

In line with its commitment to transparency, in 2023 the Group simplified its Sustainable Finance Report (which includes ACCIONA Energía and ACCIONA) and developed a tool that facilitates the reporting of asset allocation to green finance, as well as its impact. This tool allows investors to identify a specific financial instrument, access its asset allocation, view the non-financial impact attributable to it (energy production, GHG emissions avoided, waste treated, etc.) as well as the performance of corporate and local impact KPIs.

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:

<https://www.acciona.com/es/accionistas-inversores/financiacion-sostenible/>

From the point of view of its own environmental, social and governance performance, ACCIONA and ACCIONA Energía, in order to facilitate reporting to its investors, publish the information on the Principal Adverse Incidents (PAIs) required by the Sustainable Finance Disclosure Regulations (SFDR) for financial agents.

The PAIs form a set of key ESG indicators that investors should regularly monitor and report on in light of their investment positions. Such reporting directly affects those investment funds that promote environmental and social features (categorised as "Article 8" under the SFDR) and those that aim for sustainable investment ("Article 9" under the SFDR).

The Group's PAIs report can be found on the Group's website, via the following link:

<https://mediacd.acciona.com/media/nrxky5ja/2023-principal-adverse-impact-acciona.pdf>



07

COMMITMENT  
TO THE COMMUNITY

## Local ecosystems

### COMMITMENT TO THE COMMUNITY

ACCIONA Energía understands its main role in sustainable and economic development in the communities of the countries in which it operates, as well as its role as a driving force for improving people's quality of life by implementing work programmes, initiatives and collaborative projects that multiply the capacity to develop or improve regenerative solutions with the aim of accelerating the achievement of the Sustainable Development Goals.

This commitment has translated into the following results:

**Over €M 4.9**

**IN SOCIAL INVESTMENT IN THE  
COMMUNITY.**

**AROUND**

**300,000**

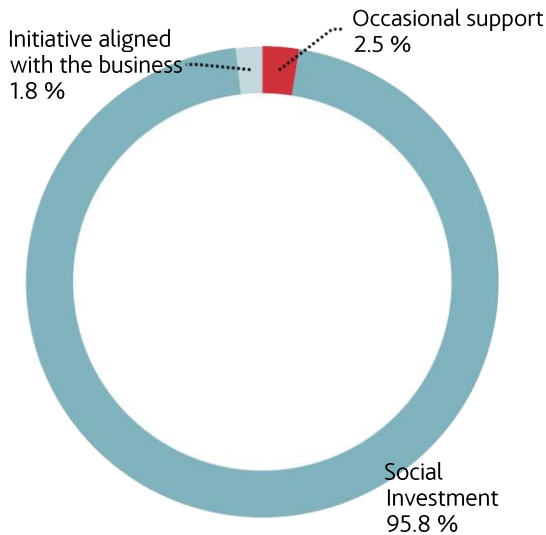
**PEOPLE WHO BENEFITED FROM VARIOUS  
SOCIAL INITIATIVES.**

These initiatives, implemented in 19 countries, contribute to people's well-being, by widening their access to education, encouraging sport and healthy lifestyle, and promoting the conservation of their heritage and care for the environment and biodiversity. They are also focused on job creation through the training of workers and the promotion of local businesses, the improvement of community infrastructures or access to basic services such as energy or water.

## Measuring investment in the community

ACCIONA measures and evaluates its investment in the community and the degree to which it contributes to the 17 Sustainable Development Goals, which enables the overview and comparison of results with other companies.

### MOTIVATION OF THE INITIATIVES

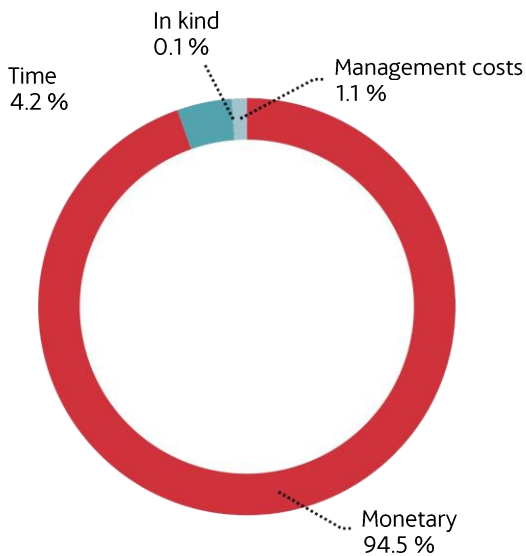


**Specific contribution:**  
Specific support for social causes

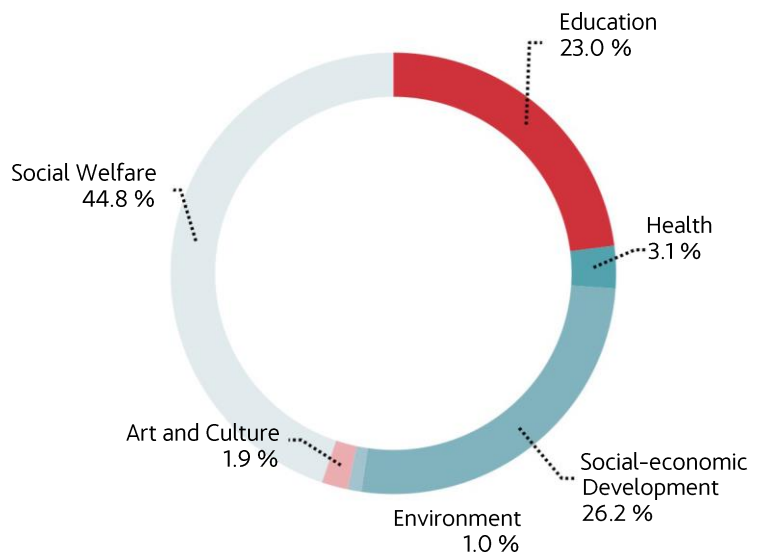
**Social investment:**  
Strategic long-term commitment to collaborating with the community.

**Initiative aligned with the business:**  
Social interest initiatives designed to directly promote the company's business.

### Type of contribution



### Contribution by area of action



CONTRIBUTION TO THE SDGS



**Working towards more local volunteering**

The Voluntary Work Programme promotes the participation of employees, as well as business partners and relatives, in initiatives driven either by the company or by themselves. The goal is to encourage local volunteering and support for the communities where ACCIONA Energía develops its projects with a view to increasing the positive impact on society and its environment. The ultimate aim is to gain a deeper insight into the local reality and strengthen the objective of being recognised as valuable players in society.

The Sustainability Master Plan 2025 has set the target of reaching 100,000 hours of voluntary work (in all ACCIONA Group) by the end of that period. Thus, in 2022, the new Volunteering Programme was launched, structured in the following typologies:

## ACCIONA.ORG FOUNDATION

Volunteering promoted by the Foundation in rural areas, in projects for access to energy, water and sanitation in the areas where acciona.org is present: Mexico, Chile, Panama, Peru, Philippines, Ethiopia and Spain.

## RECOGNITION PROGRAMME

Led by human resources, it includes programmes nominally intended for employees showing exceptional performance.

## INSTITUTIONAL VOLUNTEERING

Development of activities with third sector organisations (Foundations and NGOs), with which ACCIONA maintains an institutional collaboration relationship, such as the Princess of Girona Foundation, Integra Foundation, Quiero Trabajo Foundation, among others.

## PROJECT VOLUNTEERING

This takes place in settings where the company has projects in progress, responding to local social and environmental needs and maximising the positive impact of the projects on the community.

To promote this objective, in 2023 the implementation of the Volunteering Office was consolidated, with the challenge of promoting and managing ACCIONA's Volunteering Programme in a coordinated manner in the different areas of the company.

Among the responsibilities of the Office, we can highlight the following:

- Leading ACCIONA's Volunteering Programme
- Monitoring its development and confirm compliance with the established objectives.
- Identifying opportunities and operational management of the different types of volunteering with periodic reporting of the main indicators of employee participation in the Volunteering Programme and the impact of the programme.
- Disseminating and promoting internal employee participation in volunteering initiatives.

During 2023, 826 ACCIONA Energía volunteers took part in various initiatives, dedicating 7,008 hours to work in the community, benefiting more than 17,900 people, with a wide variety of objectives: collaborating in projects for access to energy, water and sanitation led by the acciona.org Foundation, promoting the careers of young university students, facilitating the employment integration of women with disabilities, victims of gender violence, with family responsibilities or unemployed women in vulnerable situations, teaching children about the Sustainable Development Goals (SDGs) in schools in 17 countries. Activities have also included beach clean-ups, recycling, reforestation, donations and collections for disadvantaged groups, mainly children, as well as online challenges and awareness-raising sessions.

It is worth highlighting the initiatives carried out in different countries such as Mexico, Chile and Peru, among others.

## VOLUNTEERING AT ACCIONA.ORG

The acciona.org Foundation relies on the help of ACCIONA and ACCIONA Energía employees to carry out its activities through on-site and remote volunteering, with the aim of bringing basic energy, water and sanitation services to isolated rural populations in the countries where it operates.

In 2023, acciona.org continued to encourage face-to-face collaboration in its projects in the field, as well as remotely, and implemented new forms of participation to facilitate the involvement of ACCIONA and ACCIONA Energía employees in its activity, reaching 134 people who have collaborated with the foundation at different times of the year, dedicating a total of 1,122 hours to various volunteer activities, and directly benefiting 58,520 people.

It is worth highlighting the on-site volunteering in its projects in Peru (Loreto and Cuzco), Mexico (Oaxaca), Panama (Ngäbe-Buglé) and the Philippines (Palawan). Activities were also carried out with volunteers, both face-to-face and remotely, aimed at finding ideas for, on the one hand, strengthening collaboration initiatives with the Foundation and other possible dynamics for improving existing activities and, on the other hand, facilitating the implementation of specific projects.

## ACCIONA VOLUNTEER DAY 2023

ACCIONA Energía participates in this activity as part of the ACCIONA Group. More than 700 ACCIONA volunteers, including 160 from ACCIONA Energía, took part in this year's corporate volunteering day, which consists of a training session given by ACCIONA's own employees to children aged 6 to 10 with the aim of raising their awareness of the importance of sustainable development and, in particular, the Sustainable Development Goals.

This year, volunteers have trained more than 16,400 students in more than 120 schools in 17 countries: Spain, United States, Mexico, Qatar, United Arab Emirates, Australia, Peru, Chile, Panama, Portugal, Canada, Ecuador, India, Brazil, Poland, Costa Rica, and Dominican Republic.

acciona.org Foundation

**118,615**

people benefited in Peru, Mexico, Panama, Chile, Philippines, Ethiopia and Spain, this equals 25,477 homes benefited.

**1,317**

rural and indigenous communities served in Peru, Mexico, Panama, Chile, Philippines and Spain.

**45**

supply and service centres run by local microfranchised staff.

In 2023, the acciona.org Foundation celebrated 15 years of activity, reaching more than 118,000 people to whom it provides basic energy, water and sanitation services

In Peru, Light at Home continued to expand, reaching around 2,350 additional households in Loreto, Cuzco and Cajamarca, the region where it launched this global rural electrification initiative in 2009. In Cajamarca, it has begun to replace the first home photovoltaic systems installed with state-of-the-art technology and has also brought electricity service to the Amazon jungle area of this region for the first time. For yet another year, the work carried out by Light at Home, which already benefits more than 50,000 people in Peru, was recognised on this occasion with the Business Creativity award promoted by the Peruvian University of Applied Sciences (UPC), in the category of Management with a Purpose in Environmental Impact.

In Mexico, it deployed Light at Home in 350 homes in 34 communities in Oaxaca where new photovoltaic systems were installed. In addition, in the same state, it consolidated its alliance with Rotoplas through a project that brought new rainwater harvesting systems to 50 remote households.

In Panama, Light at Home reached an additional 724 households, most of them in the Nole Duima district, where it brought electricity service for the first time since it has been working in the Ngäbe-Buglé region. Light at Home was recognised by the International Labour Organisation (ILO) as an innovative model for a just energy transition in Panama.

In Chile, in addition to extending Light at Home to almost 300 additional homes in fishing coves and rural communities in the interior of the Coquimbo region in the Andean zone, it began installing improvements to a water pumping system in Putaendo, in the Valparaíso region, so that close to 500 families will benefit from a quality service at an affordable cost.



In the Philippines, it began the extension of Light at Home in the province of Palawan, where 400 additional households benefit from a sustainable and affordable electricity service, and started a new project in collaboration with the Ayala Foundation and co-financing from the Spanish Agency for International Development Cooperation (AECID) to continue scaling up the initiative throughout the province.

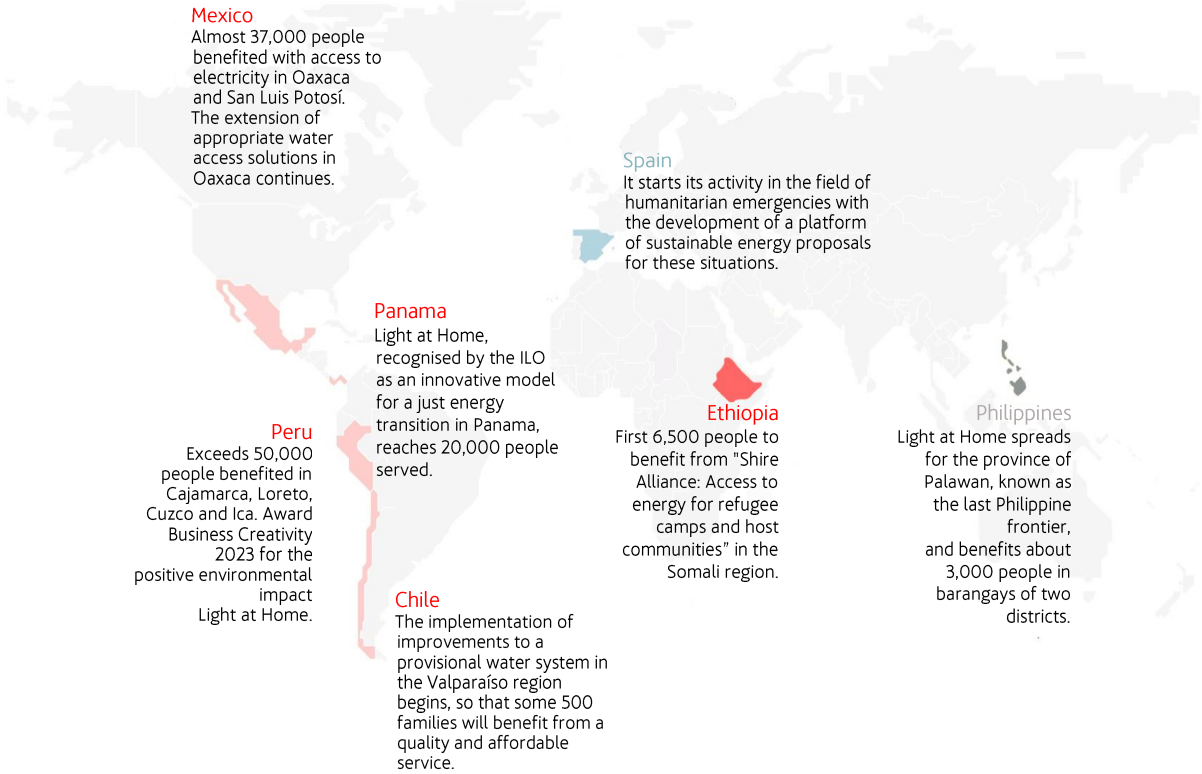
In Spain, it launched its first project in the field of humanitarian emergencies in partnership with the Action Against Hunger Foundation and with co-financing from the European Union. With this initiative, it is developing a platform for sustainable energy proposals to meet the needs of the population, and the operations of humanitarian agents, in situations of response to armed conflicts or natural disasters.

Also in humanitarian action, as part of the project it is carrying out together with AECID, the Polytechnic University of Madrid and other Spanish companies, with the collaboration of UNHCR, it began to implement the home electricity service model it has developed for the refugee and local population of Dollo Ado, in southern Ethiopia. By the end of the year, the project had supplied 900 household PV systems benefiting some 6,500 people, both refugees and inhabitants of their host communities.







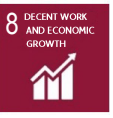
In addition, it obtained the administrative concession to start up its second collective self-consumption plant in Spain. This time to support the population living in rural Spain in Minas de Santa Quiteria, in the province of Toledo.










In short, acciona.org continues to grow its activity to benefit more people with energy, water and sanitation; by 2023, it has added close to 5,000 households with new access solutions to these services. This brings the total number of beneficiary households to 25,500, which it expects to continue to increase with the new projects it is undertaking and the new geographies it is reaching. Always in collaboration with other organisations with which it pools the knowledge and resources needed to address its actions and increase its impact.







→ IMPACTS OF ACCIONA.ORG IN 2023



LEVERS FOR TRANSFORMATION AND CONTRIBUTION TO THE SDGs

LEVER FOR TRANSFORMATION	TRANSFORMATIVE VERTICES	ACCIONA CONTRIBUTION	SDGs
PEOPLE-CENTRIC	Leadership	It is the complexity and diversity of multidisciplinary environments that address climate and social realities. ACCIONA's purpose of challenging the present to enable the future starts with people.	
	Diversity and inclusion	It is from this approach that the PEOPLE programme emerged. The implementation of policies and instruments that aim to recognise achievements, improve working environments, develop new competencies for the new leadership needed, as well as promote inclusion and diversity.	
	Recognition	ACCIONA has renewed the Top Employer seal in Spain, Brazil, Mexico, Australia, the United States, Chile and South Africa, as well as achieving it for the first time in Peru and the Philippines. In addition, it has received the Top Employers North America seal for the third time.	
	Transformative environments	Boost the management of technical and cross-disciplinary learning based on the model of the Academies with a view to developing employees in key skills in technical areas and/or critical functions to improve performance. As a result, more than 800,000 hours of training were provided in 2023.	
	Access to rights	The Sustain@ble 50:50 programme is a clear driving force of SDGs 5 and 10 as they are intended to actively promote female participation and leadership in company activity and production centres. To this end, they carry out re/ up-skilling policies and programmes.	
EXPONENTIAL LEADERSHIP	Authenticity	Creating transformative environments that have a positive impact means putting in place internal measures to ensure corporate coherence. The cohesion of the aims and objectives to which it is committed, as well as advocating the exercise of good governance practices.	
	Sustainable transformative innovation	The generation of resilient environments is defined by complexity. It thus forms a structure that leads on the basis of diversity and talent. It is therefore committed to ensuring interdisciplinary teams to address the systemic nature of the current global situation.	
	Governance	Forging alliances through initiatives such as the UN Empowerment Principles or the Global Compact Target Gender Equality.	

LEVER FOR TRANSFORMATION	TRANSFORMATIVE VERTICES	ACCIONA CONTRIBUTION	SDGs
	Transparency	Project implementation of a consolidated ESG budget with key indicators, ranging from people, the environment, through to managing environmental impact. To ensure its correct implementation and the transparency of its content, the budget is reported on a quarterly basis.	 
INTEGRATE TO TRANSFORM	Solutions-based approach	<p>ACCIONA Group has transformed its business model from responsible to resilient and from resilient to regenerative.</p> <p>The intrinsic contribution of infrastructure development to the SDGs is maximised by integrating into project design and implementation the analysis of local contexts and needs, the interactions between this and the project, and the creation of additional value from responsible solutions and innovative proposals.</p>	 
	Sustainable difference	<p>This vision is materialised through the High Impact Solutions, which help to channel the necessary investment towards projects that promote the global sustainability agenda.</p>	 
	Local ecosystems	<p>To date, the ACCIONA Group has 21 financial instruments with a dual impact structure to create local additionality. The themes of these additionalities focus on: sustainable procurement, decarbonisation of the value chain (focusing on companies with lower transformation capacity), halting the loss of local biodiversity, energy provision in geographically challenged areas, among others.</p>	
	Impact financing	<p>In addition to the contribution made by the projects, ACCIONA Group employees carry out numerous volunteer actions that promote the goals of social, sustainable and egalitarian development. These initiatives range from coaching and empowerment of women at risk of vulnerability to food collection.</p>	 

LEVER FOR TRANSFORMATION	TRANSFORMATIVE VERTICES	ACCIONA CONTRIBUTION	SDGs
PLANET POSITIVE	Climate	The protection and regeneration of the planet are fundamental to the ACCIONA Group. To have a positive influence through net positive impacts supported by innovative business models, which increase the number of people benefiting not only in a healthy climate, but also in access to water.	
	Water	The positive impact of the ACCIONA Group's projects derives from the drive for climate neutrality, the capacity to provide water and sanitation services, the promotion of processes and technologies that increase the percentage of circularity in projects and involvement in the conservation and improvement of the natural, marine and terrestrial environments in which it operates.	
	Circularity	ACCIONA Group solutions are more than 90 % aligned (in terms of CapEx) with the European taxonomy for sustainable activities, which set the roadmap for adopting the most sustainable business practices. This level of alignment denotes the ACCIONA Group's commitment and leadership for the planet.	
	Biodiversity		  

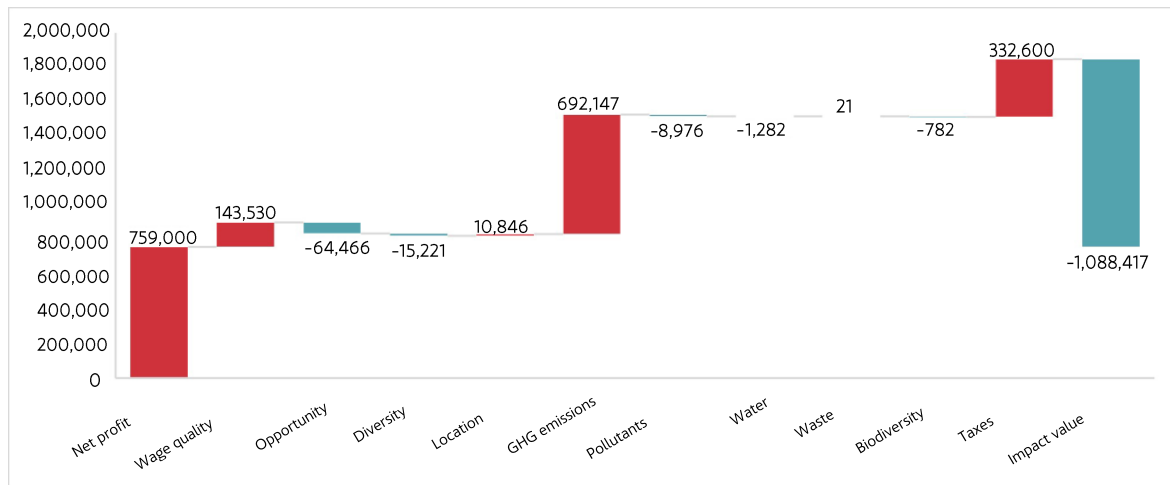
## Monetary valuation of impact

Investors are increasingly demanding information on the quantification and monetary valuation of the impacts deriving from business activities. Harvard Business School launched its Impact-Weighted Accounts Initiative (IWA) in 2019, which develops a methodology allowing the financial, social and environmental performance to be reflected in a transparent manner, useful both to investors, and for the management of the company itself.

ACCIONA Energía joined this initiative in 2021 conducting the first exercise for monetizing impacts. It carried out this exercise again in 2022 to monetize the company’s externalities at consolidated level. This involved calculating the social externalities using the Harvard methodology, and the environmental externalities using a variety of monetisation factors disseminated in the Environmental Prices Handbook (EU 28 version) and True Pricing, amongst other references.

With these calculations, the company has obtained the monetary value of the impact generated in society by ACCIONA Energía activities in the last year. These calculations provide a single, comparable measurement that can assist in decision-making when there are trade-offs between various impacts. The graph shows the monetised value of the positive and negative externalities, which are added to or subtracted from the net profit.

### ESTIMATED ANNUAL MONETARY VALUE OF THE IMPACT OF ACCIONA ENERGÍA IN 2023, ACCORDING TO THE IWA METHODOLOGY (ON THE BASIS OF NET PROFIT)



The externalities taken into account to calculate the value of the impact produced are:

- Quality of salaries paid to its employees, adjusted according to each country’s minimum living wage and the gender salary gaps.
- Difference in opportunities between men and women in the access to senior positions.
- Similarity between the diversity of demographic distribution of the workforce and the demographic distribution of the local population in each country.
- Creation of local employment, based on the hypothetical rate of unemployment without the presence of the company.
- Emissions avoided as a result of the activity and generated along the entire the value chain.

## ACCIONA Energía

- Emission of contaminants such as NOx, SOx and PM10.
- Drinking water consumption, drinking water production and waste water treatment.
- Waste generation.
- Occupation and transformation of habitats and their restoration.
- Taxes borne.

It is estimated that the company's activity contributes annually a direct benefit of over €3 billion, taking into account the monetised impacts. This added value is due principally to the quality of the wages paid, the greenhouse gas emissions avoided (65 % of the impact value) and the economic contribution to society through tax payments.

This exercise has confirmed that the actions that generate the greatest added value for society are those aligned with ACCIONA Energía's values and strategies: the fight against climate change, the importance of people, and support for local economic development.

 **More information:** [IWA initiative by Harvard Business School](#)

# 08

## IMPACT PER REGION



# SPAIN

## NEW PROJECTS AND INITIATIVES TO BE HIGHLIGHTED IN 2023

<p><b>Hybrid renewable generation plant (Cuenca)</b></p> <ul style="list-style-type: none"> <li>- Solar plant to generate 48,170 MWh</li> <li>- Wind farm to generate 57,500 MWh</li> </ul> <p>Both will generate enough to supply 43,800 households, avoiding the emission of 46,000 tonnes of CO<sub>2</sub>e</p>	<p><b>WASTE2FIBER Recycling of wind blades (Navarre)</b></p> <ul style="list-style-type: none"> <li>- Processing of 6,000 tonnes of material per year</li> <li>- 100 people supplied</li> </ul>	-
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## HIGHLIGHTED INDICATORS

	2022	2023	Variation 2022-2023
<b>ACTIVITY</b>			
Sales (million euros)	3,198	2,426	-24 %
Renewable energy production (GWh)	11,720	11,766	+1 %
<b>SOCIAL</b>			
Workforce at year-end	1,211	1,855	+53 %
Women in management and executive positions (%)	27.24 %	29.1 %	+1.86pp
Accidents: global frequency rate (employees and subcontractors)	0.62	0.66	+4 %
<b>ENVIRONMENTAL</b>			
Emissions avoided (thousands of tCO <sub>2</sub> e)	5,118	4,980	-2.8 %
Scope 1&2 GHG emissions (thousands of tCO <sub>2</sub> e)	3.9	4.7	+20 %
Percentage of waste reused (%)	98.91 %	98.50 %	-0.41pp
Water consumption (hm <sup>3</sup> )	0.97	0.64	-34 %

To calculate the variation percentage (%) we used all decimals

# AUSTRALIA

## NEW PROJECTS AND INITIATIVES TO BE HIGHLIGHTED IN 2023

### Aldoga solar plant

- 380 MW of clean energy produced
- 350 jobs
- 934,000 tonnes of CO<sub>2</sub> avoided

## HIGHLIGHTED INDICATORS

	2022	2023	Variation 2022-2023
<b>ACTIVITY</b>			
Sales (million euros)	73	56	-23 %
Renewable energy production (GWh)	1,075	1,327	+23 %
<b>SOCIAL</b>			
Workforce at year-end	165	231	+40 %
Women in management and executive positions (%)	18.4 %	18.3 %	-0.1pp
Accidents: global frequency rate (employees and subcontractors)	0.18	0.38	+111 %
<b>ENVIRONMENTAL</b>			
Emissions avoided (thousands of tCO <sub>2</sub> e)	953	1,164	+22 %
Scope 1&2 GHG emissions (thousands of tCO <sub>2</sub> e)	0.04	0.56	+1.290 %
Percentage of waste reused (%)	85.43 %	85.73 %	+0.3 pp
Water consumption (hm <sup>3</sup> )	0.0013	0.0016	+22 %

To calculate the variation percentage (%) we used all decimals

# CHILE

## NEW PROJECTS AND INITIATIVES TO BE HIGHLIGHTED IN 2023

TOLPÁN SUR WIND FARM

EL ROMERO PHOTOVOLTAIC PLANT

USYA PHOTOVOLTAIC PLANT

Capacity: 183MW

Capacity: 196MW

Capacity: 64 MWp

## HIGHLIGHTED INDICATORS

	2022	2023	Variation 2022-2023
<b>ACTIVITY</b>			
Sales (million euros)	262	248	-5 %
Renewable energy production (GWh)	2,137	2,044	-4 %
<b>SOCIAL</b>			
Workforce at year-end	171	158	-8 %
Women in management and executive positions (%)	26.6 %	28.5 %	+1.9pp
Accidents: global frequency rate (employees and subcontractors)	0.29	0.30	+3 %
<b>ENVIRONMENTAL</b>			
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,802	1,537	-15 %
Scope 1&2 GHG emissions (thousands of tCO <sub>2</sub> e)	0.02	0.2	+978 %
Percentage of waste reused (%)	0 %	14.30 %	+14.30pp
Water consumption (hm <sup>3</sup> )	0.002	0.003	+8 %

To calculate the variation percentage (%) we used all decimals

# MEXICO

## NEW PROJECTS AND INITIATIVES TO BE HIGHLIGHTED IN 2023

100% renewable electricity supply in Mexico

Supply of 100GWh/year

40,000 emissions of CO<sub>2</sub>e avoided

## HIGHLIGHTED INDICATORS

	2022	2023	Variation 2022-2023
<b>ACTIVITY</b>			
Sales (million euros)	230	277	+20 %
Renewable energy production (GWh)	3,723	3,781	+2 %
<b>SOCIAL</b>			
Workforce at year-end	269	284	6 %
Women in management and executive positions (%)	22.9 %	23.6 %	+0.7pp
Accidents: global frequency rate (employees and subcontractors)	0.13	0.11	-15 %
<b>ENVIRONMENTAL</b>			
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,878	1,969	+4 %
Scope 1&2 GHG emissions (thousands of tCO <sub>2</sub> e)	0.02	0.8	0.78 pp
Percentage of waste reused (%)	79.58 %	52.09 %	-27.49pp
Water consumption (hm <sup>3</sup> )	0.003	0.002	-11 %

To calculate the variation percentage (%) we used all decimals

# UNITED STATES

## NEW PROJECTS AND INITIATIVES TO BE HIGHLIGHTED IN 2023

### Storage batteries

Power: 190MW

Capacity: 380MWh per cycle

### Fort Bend PV Plant

315 MW of renewable energy capacity

## HIGHLIGHTED INDICATORS

	2022	2023	Variation 2022-2023
<b>ACTIVITY</b>			
Sales (million euros)	103	130	+26 %
Renewable energy production (GWh)	2,160	2,463	+14 %
<b>SOCIAL</b>			
Workforce at year-end	229	247	+8 %
Women in management and executive positions (%)	17.3 %	20.8 %	+3.5pp
Accidents: global frequency rate (employees and subcontractors)	0.46	2.22	1.76
<b>ENVIRONMENTAL</b>			
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,292	1,427	+10 %
Scope 1&2 GHG emissions (thousands of tCO <sub>2</sub> e)	5.0	3.8	-23 %
Percentage of waste reused (%)	99.16 %	79.13 %	-20.03pp
Water consumption (hm <sup>3</sup> )	0.43	0.42	-1 %

To calculate the variation percentage (%) we used all decimals

# 09

## ANNEXES

## ABOUT THIS REPORT

This Statement of Non-Financial Information (SNFI) sets out the progress, results and performance of ACCIONA Energía in sustainability in 2023, as well as its management approach and the challenges it faces. This report responds to the reporting requirements set out in Law 11/2018 on non-financial information and diversity, with a structure adapted to the new [European Sustainability Reporting Standards](#) (ESRS).

ACCIONA has prepared the report in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023. The following principles have been followed in the preparation of this Sustainability Report:

### Precision and balance

The purpose of this Report is to meticulously and impartially provide the relevant information about the company as it relates to the most significant positive and negative impacts produced on the environment and its different internal and external stakeholders. The metrics, methodologies and assumptions used for each of the indicators presented are specified throughout the report.

### Clarity

The company strives to present information that is understandable and **easily** accessible to its key stakeholders. The sustainability content is published regularly on ACCIONA Energía's website: [Nueva energía para un planeta mejor | ACCIONA Energía \(acciona-energia.com\)](#)

### Comparability

The report is based on the challenges described in previous years' sustainability reports and focuses on the progress made during 2023. Information is provided to assess the evolution of the company over time, and to evaluate performance against its peers. Comparability with previous reports is also maintained.

### Comprehensiveness

Information is provided on relevant events that occurred during the year, and no information is omitted that is necessary to understand the overall impacts of the company. The scope of the report covers all group companies. The criteria for the consolidation of information is based on the control principle developed in the international regulation on consolidation in the financial sector.

### Sustainability context

The company strives to present its impacts and contribution within the global and local context of sustainability. The company addresses the main sustainability issues that concern its internal and external stakeholders, whether these affect a particular topic or a particular line of business or geography.

The preparation of the report and the definition of its contents has been carried out on the basis of the Dual Materiality analysis. This has involved a detailed assessment of both the impact materiality and the financial

materiality of the issues addressed.

### ACCIONA Energía Dual Materiality Exercise

The Materiality Analysis 2023, carried out by ACCIONA Energía, has been conducted in accordance with the principles stipulated in the ESRS 1 standard and the specific requirements throughout the thematic standards, which are interoperable with the principles of GRI 3-3. This process has facilitated the identification of the economic, environmental and social issues of greatest relevance and impact for the development of the company's activities. The dual materiality analysis is performed annually and its results are integrated into the company's management systems. .

As a result of this study, ACCIONA Energía considers that the information contained in this document is relevant for the company and its various stakeholders. The section titled [Double Materiality Analysis](#), describes the development process and methodology used to identify the contents of the document.

### Punctuality

The company presents its sustainability information periodically, regularly and in a timely manner, so that it can be used in the decision-making process of its stakeholders regarding the company.

### Verifiability

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

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. ACCIONA Energía, through its parent company ACCIONA, has been a signatory of the United Nations Global Compact since 2005.

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 Integrated Report. The sustainability content is updated regularly on ACCIONA's website: [www.acciona-energia.com](http://www.acciona-energia.com)

### ACCIONA Parent company

  
SILVANA MARÍA GARRIDO GARDÉ  
Traductora-Intérprete Jurada de INGLÉS  
N.º 1081



ACCIONA Energía is a subsidiary of ACCIONA S.A. listed on the stock exchange since 2021. The parent company publishes its own Sustainability Report in its annual Management Report. Both reports follow the same principles and objectives.

## DEFINITION OF MATERIAL TOPICS

Material topic	Sub-issues covered	Description
E1 Climate Change	<ul style="list-style-type: none"> <li>Mitigation of climate change</li> <li>Adaptation to climate change</li> <li>Emissions avoided</li> <li>Energy</li> </ul>	For ACCIONA Energía, the fight against climate change is at the heart of its strategy, exploiting the business opportunities arising from its leadership in activities that contribute decisively to climate mitigation and adaptation. It also has a strategy to reduce emissions produced as a result of its own business activity.
E2 Pollution	<ul style="list-style-type: none"> <li>Air pollution</li> <li>Soil pollution</li> <li>Water pollution</li> </ul>	Pollution is controlled through management systems and the application of equipment and resources to prevent the release of pollutants to land, water or air as a result of its operations. This preventive approach minimises environmental impact, contributing to human health and environmental protection.
E3 Water and Water Resources	<ul style="list-style-type: none"> <li>Water consumption</li> <li>Water extraction</li> <li>Water discharges into the oceans</li> <li>Marine resource extraction and use</li> </ul>	For ACCIONA Energía, integrated water management and supply is part of its business activity and its value-added offer. On the other hand, this issue also encompasses the impact on the environment as a result of its activity, from water abstraction to discharge, consumption, intensity of use, water and wastewater treatment. All this considering the local availability of the resource.
E4 Biodiversity and Ecosystems	<ul style="list-style-type: none"> <li>Land use change, freshwater use change and sea use change</li> <li>Ecosystem condition</li> <li>Species status</li> <li>Ecosystem restoration and regeneration</li> </ul>	ACCIONA Energía aligns with the definition given by the TNFD for <a href="#">biodiversity and ecosystems</a> . The company adopts a proactive approach to respecting biodiversity, which encompasses the conservation and protection of biological diversity at all levels: genetic, species and ecosystem. The company implements measures to assess and mitigate its impact on biodiversity, engaging in practices that include analysis of affected ecosystems, development of conservation strategies, and rigorous compliance with environmental regulations, reflecting its commitment to environmental sustainability.
E5 Resources and Circular Economy	<ul style="list-style-type: none"> <li>Resource inputs, including resource use</li> <li>Resource outflows</li> <li>Waste</li> </ul>	ACCIONA Energía promotes the <a href="#">circular economy</a> as the cornerstone of its resource management, adopting a system in which material flows are kept in circulation and do not become waste. The company implements maintenance, readiness for reuse and recycling practices, helping to address global challenges such as climate change, biodiversity loss, resource waste and environmental pollution. In this way, it seeks to decouple economic activity from linear resource-waste dynamics.
S1 Own Staff	<ul style="list-style-type: none"> <li>Adequate working conditions to ensure the safety and health of workers.</li> <li>Equal treatment and opportunities for all employees.</li> <li>Respect and promotion of human and labour rights.</li> </ul>	ACCIONA Energía's workforce includes employees with a direct working relationship with the company, offering working conditions, safety and skills development that place people at the centre of its strategy. It also promotes a safe working environment, equal treatment and opportunities, and respect for workers' rights in all its operations.
S2 Value chain workers	<ul style="list-style-type: none"> <li>Proper supply chain management to safeguard the rights of non-employee workers</li> <li>Communication channels for workers in the value chain</li> <li>Human Rights</li> </ul>	ACCIONA Energía recognises the employees in its value chain as fundamental to its business success. For this reason, it promotes adequate working conditions, emphasising the importance of occupational health and safety, the promotion of equal treatment and opportunities, and respect for labour rights throughout the value chain.
S3 Affected Communities	<ul style="list-style-type: none"> <li>Communities affected by ACCIONA Energía's operations</li> <li>Positive and negative impacts</li> <li>Communication and remediation</li> <li>Social impact management</li> <li>Rights of affected groups</li> </ul>	ACCIONA Energía has the potential to have significant positive and negative impacts on the communities in which it operates. This ranges from local communities in the immediate vicinity of their activities to those that are more indirectly influenced. Affected groups include the local population, indigenous peoples and other rights-bearing groups.

S4 Customers and End Consumers	<ul style="list-style-type: none"> <li>• ACCIONA Energía customers and end consumers</li> <li>• Positive and negative impacts</li> <li>• Communication and remediation</li> <li>• Safety of products and services</li> <li>• Access to products and services</li> </ul>	<p>For ACCIONA Energía, consumers and end customers are individuals who acquire, consume or use goods and services provided by ACCIONA Energía. Through its solutions for decarbonisation, ACCIONA Energía covers a wide and heterogeneous group of customers and end consumers, committing to meet their diverse needs with sustainable and value-added solutions.</p>
G1 Taxation and Business Conduct	<ul style="list-style-type: none"> <li>• Responsible taxation</li> <li>• Corporate culture (ethics and anti-corruption)</li> <li>• Corporate Governance</li> <li>• Sustainable supplier management</li> <li>• Commitments and relations with public administrations</li> </ul>	<p>ACCIONA Energía's taxation and business conduct are determined by a corporate culture that prioritises ethics, transparency and sustainable supplier management. These principles translate into sound fiscal practices and business behaviour that reflect the company's values, mission and codes of conduct, guiding all its operations and relationships.</p>

## Other ACCIONA Energía public reports

- Integrated Report
- Half-yearly sustainability report
- Evolution of the main indicators in the first half of the year.
- Sustainable financing report
- ESG funds and impacts linked to sustainable financing achieved at project and corporate level.

ACCIONA Energía, a listed company, also discloses its own Sustainability Report and other reports independently.

## ANNEX OF ITEMISED INDICATORS

### PRODUCTS AND SERVICES FOR PUBLIC AND PRIVATE-SECTOR CUSTOMERS

PRODUCTS AND SERVICES	PUBLIC AND PRIVATE CUSTOMERS BUSINESS-TO-CONSUMER (B2C) AND BUSINESS-TO-BUSINESS (B2B) IN 2023
<p>ENERGY: sale of renewable energy, renewable technology EPC contracts and O&amp;M of renewable technology plants and PPA.</p>	<p><b>Number of B2C customers</b></p> <ul style="list-style-type: none"><li>- <b>Solar farms:</b> Operation, maintenance and customer services for solar farms in Spain: <b>2,745</b></li><li>- <b>Electric Mobility:</b> Electric vehicle charging service in Spain (single customers with at least one service): <b>11,198</b></li><li>- <b>Solideo:</b> Design, implementation and maintenance of self-consumption photovoltaic installations in Spain: <b>1,624</b></li><li>- <b>Solideo Energy:</b> Electricity supply and management in Spain: <b>514</b></li></ul> <p><b>Number of public B2B customers</b></p> <ul style="list-style-type: none"><li>- <b>Renewable energy supply company in Spain:</b> supply of electricity from renewable sources to public customers in Spain: <b>51</b></li><li>- <b>Renewable energy supply company in Portugal:</b> supply of electricity from renewable sources to public customers in Portugal: <b>3</b></li><li>- <b>Renewable energy supply company in Chile:</b> supply of electricity from renewable sources to public customers in Chile: <b>15</b></li><li>- <b>Solideo:</b> design, implementation and maintenance of self-consumption photovoltaic installations for public customers in Spain: <b>2</b></li><li>- <b>ACCIONA ESCO:</b> Design, implementation and maintenance of energy efficiency projects for public clients in Spain: <b>4</b></li></ul> <p><b>Number of private B2B customers</b></p> <ul style="list-style-type: none"><li>- <b>Renewable energy supply company in Spain:</b> supply of electricity from renewable sources to large companies and SMEs: <b>16,900</b></li><li>- <b>Renewable energy supply company in Mexico:</b> supply of electricity from renewable sources to large companies: <b>10</b></li><li>- <b>Renewable energy supply company in Portugal:</b> supply of electricity from renewable sources to large companies in Portugal: <b>277</b></li><li>- <b>Renewable energy supply company in Chile:</b> supply of electricity from renewable sources to large companies in Chile: <b>13</b></li><li>- <b>Solideo Energy supply company:</b> supply and management of electricity to SMEs in Spain: <b>95</b></li><li>- <b>Solideo:</b> design, implementation and maintenance of self-consumption photovoltaic installations for companies in Spain: <b>125</b></li><li>- <b>ACCIONA ESCO:</b> Design, implementation and maintenance of energy efficiency projects for private clients in Spain, France and Mexico: <b>11</b></li><li>- <b>Electric Mobility:</b> Installation of charging points and/or use of app platform for charging in companies in Spain: <b>2</b></li><li>- <b>EQINOV:</b> Services linked to energy saving and efficiency for industrial and tertiary sector consumers in France: <b>450</b></li></ul>

## Distribution of employment

(GRI 2-7)

### EVOLUTION OF THE NUMBER OF EMPLOYEES PER CONTRACT TYPE AND AGE RANGE (%)

RANGES	2022		2023	
	TEMPORARY	PERMANENT	TEMPORARY	PERMANENT
< 31 years	1.8 %	16.8 %	7.35 %	92.65 %
31 to 50 years	1.4 %	67.2 %	2.16 %	97.84 %
> 50 years	0.5 %	12.3 %	3.62 %	96.38 %

### EVOLUTION OF THE NUMBER OF EMPLOYEES PER CONTRACT TYPE AND JOB CLASSIFICATION (%)

GROUPS	2022		2023	
	TEMPORARY	PERMANENT	TEMPORARY	PERMANENT
Executives and managers	0.3 %	23.3 %	0.90 %	99.10 %
Technical staff	2.9 %	45.5 %	5.89 %	94.11 %
Support staff	0.1 %	3.7 %	3.96 %	96.04 %
Operators	0.5 %	23.7 %	1.22 %	98.78 %

### BREAKDOWN OF THE WORKFORCE BY AGE RANGE AND TYPE OF WORKING DAY (%)

RANGES*	2023				TOTAL
	FULL TIME		PART TIME		
	MEN	WOMEN	MEN	WOMEN	
< 31 years	67.88 %	30.27 %	0.56 %	1.28 %	18.02 %
31 to 50 years	75.63 %	23.66 %	0.14 %	0.57 %	69.83 %
> 50 years	77.64 %	21.07 %	0.27 %	1.02 %	12.15 %
<b>Total employees</b>	<b>74.48 %</b>	<b>24.54 %</b>	<b>0.23 %</b>	<b>0.76 %</b>	<b>100.00 %</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

**BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND GENDER (NO. OF EMPLOYEES)**

GROUPS*	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives and managers		144	556	460	174	634
Technical staff	752	388	1,141	885	449	1,333
Support staff	11	78	89	14	109	123
Operators	528	41	569	956	53	1,009
<b>Total employees</b>	<b>1,703</b>	<b>652</b>	<b>2,354</b>	<b>2,315</b>	<b>784</b>	<b>3,099</b>

**BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND TYPE OF WORKING DAY (NO. OF EMPLOYEES)**

GROUPS*	2023				
	FULL TIME		PART TIME		TOTAL
	MEN	WOMEN	MEN	WOMEN	
Executives and managers	460	171	0	3	634
Technical staff	882	436	3	12	1,333
Support staff	12	105	2	4	123
Operators	954	49	2	4	1,009
<b>Total employees (No.)</b>	<b>2,308</b>	<b>760</b>	<b>7</b>	<b>23</b>	<b>3,099</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

**AVERAGE PERMANENT CONTRACTS PER YEAR BY AGE, GENDER AND JOB CLASSIFICATION (NO. OF EMPLOYEES)**

GROUP*	2023							
	MEN				WOMEN			
	< 31	31 TO 50	> 50	TOTAL	< 31	31 TO 50	> 50	TOTAL
Executives and managers	4	348	108	460	4	135	35	174
Technical staff	225	579	81	885	126	298	24	449
Support staff	2	8	3	14	10	79	20	109
Operators	151	704	101	956	36	12	4	53
<b>Total employees</b>	<b>382</b>	<b>1,640</b>	<b>293</b>	<b>2,315</b>	<b>176</b>	<b>524</b>	<b>83</b>	<b>784</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

**Recruitment (401-1)**

## EVOLUTION OF NEW HIRES (NO. OF EMPLOYEES)

2021			2022			2023		
MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
264	128	392	308	159	467	364	163	527

## NUMBER OF NEW HIRES BY REGION (NO. OF EMPLOYEES)

REGIONS*	MEN	WOMEN	TOTAL
Spain	118	44	162
South America	26	23	49
Asia and Oceania	64	39	103
North America	121	36	157
Europe	26	16	42
Africa	9	5	14
<b>GRAND TOTAL</b>	<b>364</b>	<b>163</b>	<b>527</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

## NEW HIRES BY AGE GROUP (NO.)

RANGES*	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
< 31 years	119	70	189	153	79	232
31 to 50 years	171	88	259	190	75	265
> 50 years	18	1	19	21	9	30
<b>Total employees</b>	<b>308</b>	<b>159</b>	<b>467</b>	<b>364</b>	<b>163</b>	<b>527</b>

\* The calculation methodology may use values with decimals that will later be rounded off.

## Dismissals

(401-1)

### DISMISSALS BY GENDER AND JOB CLASSIFICATION (NO.)

GROUP	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives and managers	3	1	4	7	2	9
Technical staff	13	6	19	12	11	23
Support staff	1	1	2	0	2	2
Workmen and employees	11	1	12	15	1	16
<b>Total employees</b>	<b>26</b>	<b>8</b>	<b>37</b>	<b>34</b>	<b>16</b>	<b>50</b>

### DISMISSALS BY JOB CLASSIFICATION AND AGE RANGE (NO.)

GROUP*	2022				2023			
	< 31	31 TO 50	> 50	TOTAL	< 31	31 TO 50	> 50	TOTAL
Executives and managers	0	4	0	4	0	3	6	9
Technical staff	2	12	5	19	8	3	12	23
Support staff	0	2	0	2	0	1	1	2
Operators	3	6	3	12	5	1	10	16
<b>Total employees</b>	<b>5</b>	<b>24</b>	<b>8</b>	<b>37</b>	<b>13</b>	<b>8</b>	<b>29</b>	<b>50</b>

ACCIONA Energía's staffing tables for the 2023 period use the Full Time Equivalent (FTE) method to calculate the workforce. This methodology allows both part-time and full-time employees to be represented in a standardised way. The formula for the FTE is:

$(\text{Hours of part-time employees} / \text{Hours of a full-time employee}) + \text{Full-time employees}$ . With this calculation, ACCIONA Energía obtains a representative number of its workforce, adjusted for hours worked, facilitating a homogeneous comparison of its workforce.

### Characteristics of the non-salaried employees in the enterprise's workforce (S1-7)

No. of non-employee workers (external) in 2023 (headcount): 2,079

Number of employees with zero hours contracts (no guaranteed hours) in 2023 (headcount): 5

## RATIO BETWEEN HIGHEST WAGE EARNER AND AVERAGE WAGE, BY BUSINESS LINE AND COUNTRY

SPAIN	MEXICO	USA	CHILE	AUSTRALIA
15.9	9.4	5.5	4.8	3.8

## RATIO BETWEEN THE PERCENTAGE INCREASE OF THE TOTAL ANNUAL COMPENSATION RATE OF THE HIGHEST WAGE EARNER IN THE ORGANISATION AND THE AVERAGE PERCENTAGE INCREASE OF THE AVERAGE WAGE:

SPAIN	MEXICO	USA	CHILE	AUSTRALIA
-8.5 %	11.6 %	23.4 %	6.8 %	166.1 %

## RELEVANT ENVIRONMENTAL INDICATORS

### Use of water

(303-3, 303-4, 303-5)

	2019	2020	2021	2022	2023
<b>WATER FOR INTERNAL CONSUMPTION (M<sup>3</sup>)</b>					
On-site recycled/reused water	0	0	0	0	0
Recycled water from networks	492,613	490,253	487,073	499,175	255,467
Rainwater	484	400	355	358	508
Municipal drinking water	523,432	477,442	446,417	482,872	473,352
Surface water	482,054	474,708	501,407	423,599	343,132
Groundwater	2,724	4,979	2,308	3,451	3,500
<b>TOTAL</b>	<b>1,501,308</b>	<b>1,447,781</b>	<b>1,437,559</b>	<b>1,409,455</b>	<b>1,075,959</b>
<b>DISCHARGE (M<sup>3</sup>)</b>					
Discharge into the sea	0	0	0	0	0
Discharge to surface water	311,904	321,077	325,615	312,501	236,544
Discharge into the sewer system	13,923	14,572	11,889	13,223	16,061
<b>TOTAL</b>	<b>325,826</b>	<b>335,649</b>	<b>337,504</b>	<b>325,724</b>	<b>252,605</b>

\* Figures restated after correcting an error in the water consumption for the Nevada Solar One thermosolar plant (U.S.A.).

The previous years' figures have been recalculated to include the EROM business line.

In addition to this consumption, ACCIONA Energía carries out water transfer activities. This refers to water that enters and leaves facilities (hydroelectric and biomass plants) without generating any type of consumption and without the quality of the water or the ecosystems being affected in any significant way. For this reason they do not involve any consumption for the company.

The total amount of water transferred in 2022 in hydroelectric plants was 16,333,930,879 m<sup>3</sup>, whereas the amount of water used to cool the biomass plants and fully returned without physical or chemical alterations was 22,871,187 m<sup>3</sup>.



### Evolution in the use of water in areas with water stress

	2019	2020	2021	2022	2023
<b>WATER FOR INTERNAL CONSUMPTION (m<sup>3</sup>)</b>					
On-site recycled/reused water	0	0	0	0	0
Recycled water from networks	0	0	0	0	0
Rainwater	19	6	0	0	0
Municipal drinking water	332	306	321	232	913.2
Surface water	0		0	0	0
Groundwater	1,380	1,757	1,019	900	956
<b>TOTAL</b>	<b>1,730</b>	<b>2,069</b>	<b>1,340</b>	<b>1,132</b>	<b>1,869</b>
<b>DISCHARGE (m<sup>3</sup>)</b>					
Discharge into the sea	0	0	0	0	0
Discharge to surface water	0	0	0	40	0
Discharge into the sewer system	0	38	150	53	220
<b>TOTAL</b>	<b>0</b>	<b>38</b>	<b>150</b>	<b>93</b>	<b>220</b>

The previous years' figures have been recalculated to include the EROM business line.

# EUROPEAN TAXONOMY FOR ECONOMIC ACTIVITIES ENVIRONMENTALLY SUSTAINABLE

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 are 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 compared 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 are divided into the total figures.

The proportion of eligible economic activities according to the taxonomy in 2023 was:

The proportion of eligible economic activities according to the taxonomy in 2023 was:

- CapEx: 97.62 % eligible out of total number
- OpEx: 92.67 % eligible out of total number
- Ventas: 57.49 % 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 RD (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.

In general terms, the activities carried out to develop the requirements of the above-mentioned standards have been as follows:

1. Confirm the eligibility of each assessed activity.
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 objectives.
4. In relation to 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 non-existence of non-compliance in this regard.
5. Confirm the existence of internal procedures or tools to ensure the traceability of information and its consistency with financial reporting.

In addition, on a voluntary basis and following the methodology described above, 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: 99.99 %** aligned on eligible figure being 97.60 % aligned on total figure
- **OpEx: 98.24 %** aligned on eligible figure being 91.04 % aligned on total figure
- **Ventas: 97.24 %** aligned over total figure being 55.91 % aligned over total figure

Regarding last year's financial results, it is important to highlight both the percentage increase and the increase in absolute values of **eligibility** in relation to total sales, OpEx and CapEx figures. The trading activity of renewable energy generated by third parties is the main component of the ineligible figures.

In terms of alignment figures, there has been a percentage increase in all indicators compared to the previous year. This increase has been achieved despite a decrease in the totals of these figures, as the degree of alignment has improved by extending taxonomic requirements to the investment process in all cases and making investments to meet technical criteria in operational centres that did not previously meet them.

#### Accounting principles applied

To identify the figures of sales, CapEx and OpEx, the indications specified in Annex of the Delegated Regulation (EU) 2021/2178 were taken into account in relation to the international financial accounting standards.

In particular:

For business sales, the figures extracted relate to the definition given in article 2, sub-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:

- a. IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- b. IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- c. IAS 40 Investment property, paragraph 76, letters a) and b), (for the fair value model);
- d. IAS 40 Investment property, paragraph 79, letter d), points i) and ii), (for the cost model);
- e. IAS 41 Agriculture, paragraph 50, letters b) and e);
- f. 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 EU Regulation 2020/852 has been double counted for activities linked to the other environmental objectives when deriving the consolidated ratios at company level. However, this

information is provided at the target level in the tables below.

The following pages show the results of the eligibility and alignment of ACCIONA Energía's activities with taxonomy. They follow the format of the templates for the key indicators of results of non-financial undertakings under Annex I of the Delegated Regulation (EU) 2021/2178.

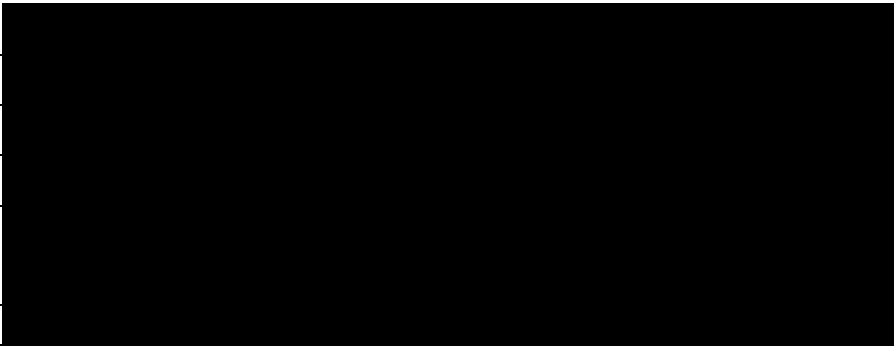
For the absolute figures of OpEx and CapEx below the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, for which reason they may differ from the figures presented under the same heading in the company's financial statements.

ALL ENVIRONMENTAL OBJECTIVES - DELEGATED REGULATIONS (EU) 2021/2139, 2023/2385 AND 2023/2386 - SALES

Sales				Criteria for substantial contribution						Criteria for the absence of significant harm ("It causes no significant harm")						Proportion of sales conforming to taxonomy (A.1) or eligible according to taxonomy (A.2), year 2022 (%)	Category (facilitator action) (F)	Category (transition action) (T)
Business activities	Codes	Sales (€)	Proportion of sales (%)	Mitigation of climate change (Y; N; N/EL)	Adaptation to climate change (Y; N; N/EL)	Water (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity (Y/N)	Minimum guarantees (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity (Y/N)			
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																		
<b>A.1. Sustainable environmental activities (taxonomy-compliant)</b>																		
Electricity production using solar power technology	CCM 4.1	142,866,579.74	4.03 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	4.35 %	
Electricity production using concentrated solar power technology	CCM 4.2	17,919,860.14	0.51 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	0.74 %	
Electricity production using wind power technology	CCM 4.3	1,532,593,416.51	43.20 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	77.04 %	
Electricity production using hydroelectric power technology	CCM 4.5	164,958,230.46	4.65 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	8.41 %	
Electricity production from bioenergy.	CCM 4.8	48,331,935.52	1.36 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	3.17 %	

Electricity transport and distribution.	CCM 4.09	255,468.64	0.01 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	0.01 %	F	
Energy storage.	CCM 4.10	8,879,802.55	0.25 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	0.00 %	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).	CCM 7.04	1,019,529.98	0.03 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	0.02 %	F	
Installation, maintenance and repair of renewable energy technologies.	CCM 7.06	4,924,883.14	0.14 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	0.05 %	F	
Research, development and innovation close to the market.	CCM 9.01	785,000.00	0.02 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	0.00 %	F	
Professional services related to the energy efficiency of buildings	CCM 9.03	60,725,982.09	1.71 %	Y	N / EL	N / EL	N / EL	N / EL	N / EL	Y	Y	Y	Y	Y	Y	Y	Y	2.78 %	F	
<b>Sales for sustainable environmental activities (taxonomy-compliant) (A.1)</b>		<b>1,983,260,689.77</b>	<b>55.91 %</b>	<b>55.91 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	Y	Y	Y	Y	Y	Y	Y	Y	96.58 %		
<b>Of which: facilitators</b>			<b>55.91 %</b>	<b>55.91 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	0.00 %	Y	Y	Y	Y	Y	Y	Y	0.00 %	F	
<b>Of which: transitional</b>			<b>0.00 %</b>	<b>0.00 %</b>						Y	Y	Y	Y	Y	Y	Y	Y	0.00 %		T
<b>A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)</b>																				
Electricity production using solar power technology	CCM 4.01	0	0.00 %																	
Electricity production using concentrated solar power technology	CCM 4.02	0	0.00 %																	
Electricity production using wind power technology	CCM 4.03	3,782,696.26	0.11 %																	
Electricity production using hydroelectric power technology	CCM 4.05	52,546,550.61	1.48 %																	
Electricity production from bioenergy.	CCM 4.08	0	0.00 %																	
Electricity transport and distribution.	CCM 4.09	0	0.00 %																	
Energy storage.	CCM 4.10	0	0.00 %																	
Installation, maintenance and repair of charging stations for electric vehicles in	CCM 7.04	0	0.00 %																	

buildings (and in car-parking spaces annexed to buildings).			
Installation, maintenance and repair of renewable energy technologies.	CCM 7.06	0	0.00 %
Research, development and innovation close to the market.	CCM 9.01	0	0.00 %
Professional services related to the energy efficiency of buildings	CCM 9.03	0	0.00 %
<b>Sales for taxonomy-eligible activities but not environmentally sustainable (not compliant with taxonomy) (A.2)</b>		<b>56,329,246.87</b>	<b>1.59 %</b>
<b>Total (A.1 + A.2)</b>		<b>2,039,589,935.64</b>	<b>57.49 %</b>
<b>B. TAXONOMY NON-ELIGIBLE ACTIVITIES</b>			
<b>Sales for taxonomy non-eligible activities (B)</b>		<b>1,507,878,790.12</b>	<b>42.51 %</b>
<b>Total (A + B)</b>		<b>3,547,468,725.76</b>	<b>100 %</b>





	Ratio of sales / total sales	
	that conforms to the taxonomy by objective	Eligible according to taxonomy by objective
CCM	55.91%	57.49%
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 this 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, the company 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 Group has only used sales with external third parties to the Group 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 Group's consolidated revenue data without including internal consumption or other non-eligible services.

Therefore, the total sales reported for renewable energy production equals sales of €2,084M –generation (€1,464 non-generation) shown in Note 28 – Information by segments, of the 2023 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
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																					
<b>A.1. Sustainable environmental activities (taxonomy-compliant)</b>																					
Electricity production using solar power technology	CCM 4.1	4,044,211.80	3.05 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	5.73 %			
Electricity production using concentrated solar power technology	CCM 4.2	870,904.65	0.66 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	1.28 %			
Electricity production using wind power technology	CCM 4.3	106,778,302.07	80.51 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	80.92 %			
Electricity production using hydroelectric power technology	CCM 4.5	3,290,201.18	2.48 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	6.13 %			

Electricity production from bioenergy.	CCM 4.8	1,575,932.01	1.19 %	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 4.9	2,358,636.83	1.78 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	1.00 %	F	
Energy storage.	CCM 4.10	393,341.83	0.30 %	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 charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).	CCM 7.4	6,534.54	0.00 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.44 %	F	
Installation, maintenance and repair of renewable energy technologies.	CCM 7.6	388,304.19	0.29 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.42 %	F	
Research, development and innovation close to the market.	CCM 9.1	1,001,015.68	0.75 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00 %	F	
Professional services related to the energy efficiency of buildings	CCM 9.3	40,476.33	0.03 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.04 %	F	
<b>OpEx for sustainable environmental activities (taxonomy-compliant)(A.1)</b>		<b>120,747,861.11</b>	<b>91.04 %</b>	<b>91.04 %</b>	0.00 %	0.00 %	0.00 %	0.00 %	0.00 %	Y	Y	Y	Y	Y	Y	Y	<b>96.77 %</b>		
<b>Of which: facilitators</b>			<b>91.04 %</b>	<b>91.04 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	Y	Y	Y	Y	Y	Y	Y			
<b>Of which: transitional</b>			<b>0.00 %</b>	<b>0.00 %</b>						Y	Y	Y	Y	Y	Y	Y			
<b>A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)</b>																			
Electricity production using solar power technology	CCM 4.1	0	0.00 %																
Electricity production using concentrated solar power technology	CCM 4.2	0	0.00 %																
Electricity production using wind power technology	CCM 4.3	0	0.00 %																
Electricity production using hydroelectric power technology	CCM 4.5	854,679.99	0.64 %																
Electricity production from bioenergy.	CCM 4.8	1,305,410.11	0.98 %																
Electricity transport and distribution.	CCM 4.9	0	0.00 %																
Energy storage.	CCM 4.10	0	0.00 %																
Installation, maintenance and repair of charging	CCM	0	0.00 %																

stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).	7.4		
Installation, maintenance and repair of renewable energy technologies.	CCM 7.6	0	0.00 %
Research, development and innovation close to the market.	CCM 9.1	0	0.00 %
Professional services related to the energy efficiency of buildings	CCM 9.3	0	0.00 %
<b>OpEx for taxonomy-eligible activities but not environmentally sustainable (not compliant with taxonomy) (A.2)</b>		<b>2,160,090.10</b>	<b>1.63 %</b>
<b>Total (A.1 + A.2)</b>		<b>122,907,951.21</b>	<b>92.67 %</b>
<b>B. TAXONOMY NON-ELIGIBLE ACTIVITIES</b>			
<b>OpEx for taxonomy non-eligible activities (B)</b>		<b>9,723,715.98</b>	<b>7.33 %</b>
<b>Total (A + B)</b>		<b>132,631,667.19</b>	<b>100 %</b>



	Ratio of OpEx / Total OpEx	
	that conforms to the taxonomy by objective	Eligible according to taxonomy by objective
CCM	91.04 %	92.67 %
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 (%)	Mitigation of climate change (Y; N; N/EL)	Adaptation to climate change (Y; N; N/EL)	Water (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity (Y/N)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity (Y/N)	Minimum guarantees (Y/N)	Proportion of sales conforming to taxonomy (A.1) or eligible according to taxonomy (A.2), Year 2022 (%)	Category (facilitator action) (F)	Category (transition action) (T)
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Sustainable environmental activities (taxonomy-compliant)</b>																			
Electricity production using solar power technology	CCM 4.1	1,140,933,006.03	33.79 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	41.81 %		
Electricity production using wind power technology	CCM 4.3	2,062,540,156.12	61.08 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	34.03 %		
Electricity production using hydroelectric power technology	CCM 4.5	3,795,007.14	0.11 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.15 %		
Electricity production from bioenergy.	CCM 4.8	41,792,410.05	1.24 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.05 %		
Electricity transport and distribution.	CCM 4.9	31,367.33	0.00 %	y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.03 %	F	

Energy storage.	CCM 4.10	6,650,038.67	0.20 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	13.78 %	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).	CCM 7.4	9,178,535.17	0.27 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.22 %	F	
Installation, maintenance and repair of renewable energy technologies.	CCM 7.6	7,068,418.40	0.21 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.42 %	F	
Research, development and innovation close to the market.	CCM 9.1	3,078,204.42	0.09 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.00 %	F	
Professional services related to the energy efficiency of buildings	CCM 9.3	20,797,527.54	0.62 %	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	6.62 %	F	
<b>CapEx for sustainable environmental activities (taxonomy-compliant) (A.1)</b>		<b>3,295,864,670.87</b>	<b>97.60 %</b>	<b>97.60 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	Y	Y	Y	Y	Y	Y	Y	<b>99.85 %</b>		
<b>Of which: facilitators</b>			<b>97.60 %</b>	<b>97.60 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	<b>0.00 %</b>	Y	Y	Y	Y	Y	Y	Y			
<b>Of which: transitional</b>			<b>0.00 %</b>	<b>0.00 %</b>																
<b>A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)</b>																				
Electricity production using wind power technology	CCM 4.3	138,787.92	0.00 %																	
Electricity production using hydroelectric power technology	CCM 4.5	300,351.41	0.01 %																	
<b>CapEx for taxonomy-eligible activities but not environmentally sustainable (not compliant with taxonomy) (A.2)</b>		<b>439,139.33</b>	<b>0.01 %</b>																	
<b>Total (A.1 + A.2)</b>		<b>3,296,303,810.20</b>	<b>97.62 %</b>																	
<b>B. TAXONOMY NON-ELIGIBLE ACTIVITIES</b>																				
<b>CapEx for taxonomy non-eligible activities (B)</b>		<b>80,517,362.85</b>	<b>2.38 %</b>																	
<b>Total (A + B)</b>		<b>3,376,821,173.05</b>	<b>100 %</b>																	

	Ratio of CapEx / Total CapEx	
	that conforms to the taxonomy by objective	Eligible according to taxonomy by objective
CCM	97.60 %	97.62 %
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 2023, ACCIONA Energía (which parent company is ACCIONA), 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 Funding Report for 2023.

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 funding, 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.

## TABLES OF CONTENTS

### GRI Table of Contents

GRI Standard	Content	Pages and section in other ACCIONA Energía reports	Direct response or omission	Reasonable assurance; covered companies
GRI 1: Foundation 2021				
GRI 2: General Disclosures 2021				
2-1	Organisation details	14	CORPORACIÓN ACCIONA ENERGÍAS RENOVABLES Private company listed on stock exchanges CAMPUS ACCIONA Gran Vía de Hortaleza, 3 Madrid	
2-2	Entities included in the organization's sustainability report	Corporación ACCIONA Energías Renovables Consolidated Financial Statements 2023 (Appendices I, II, III)		



2-3	Reporting period, frequency and contact		2023 ( calendar year ending on 31 December ) Reporting cycle Contact: <a href="mailto:responsabilidadcorporativa@acciona.es">responsabilidadcorporativa@acciona.es</a>	
2-4	Restatements of information		There has been no change since the 2022 Statement of Non-Financial Information	
2-5	External assurance		All of the information concerning the GRI Standards of this table of contents has been externally audited	
2-6	Activities, value chain and other business relationships	4-15, 272		
2-7	Employees	16, 103-104, 108, 273-277		Yes
2-8	Workers who are not employees	276		
2-9	Governance structure and composition	24-27, 200-201 Corporate Governance Report 2023 (Paragraphs C1.2, C1.3 and C2.1)		
2-10	Nomination and selection of the highest governing body	Corporate Governance Report 2023 (Section C1.16)		
2-11	Chair of the highest governing body	200-201 Corporate Governance Report 2023 (Section C1.3)		
2-12	Highest governing body's role in overseeing impact management	24-26 Corporate Governance Report 2023 (Section C2.1)		
2-13	Delegation of responsibility for managing impacts	24-26 Corporate Governance Report 2022 (Sections C1.3 and C2.1)		
2-14	Highest governing body's role in sustainability reporting	24-26 Governance and sustainability management		
2-15	Conflicts of interest	Corporate Governance Report 2023 (Section D6)		
2-16	Communication of critical concerns	24, 33-36, 38, 46		
2-17	Collective knowledge of highest governing body	24-26 Corporate Governance Report 2023 (Competency Matrix)		
2-18	Evaluation of the performance of the highest governing body	201-202 Corporate Governance Report 2023 (Section C1.17)		
2-19	Remuneration policies	202-203 Annual Report on Remuneration of Directors 2023 (Section A)	Annual Report on Remuneration of Directors 2023 (Section A)	

2-20	Process for determining remuneration	202-203 Annual Report on Remuneration of Directors 2023 (Section A)	Annual Report on Remuneration of Directors 2023 (Section A)	
2-21	Annual total compensation ratio	113, 277		
2-22	Statement on sustainable development strategy	4-13, 26-30, 58-59		
2-23	Commitments and policies	25		
2-24	Embedding policies and commitments	24-26		
2-25	Processes to remedy negative impacts	61-62, 73-74, 76-77, 87-89, 162-164, 169, 177-178, 190-191		
2-26	Mechanisms for seeking advice and raising concerns	208-210		
2-27	Compliance with laws and regulations	230-241		
2-28	Membership associations	215-217		
2-29	Approach to stakeholder engagement	32-33, 102, 175, 187-188		
2-30	Collective bargaining agreements	102, 120-121		
2-13	Process to determine material topics	34-37		
2-14	List of material topics	34-37, 268-269		

### E1 Climate Change

#### GRI 3: Material topics 2021

3-3	Management of material topics	44-46		
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#### GRI 201: Economic performance 2016

201-2	Financial implications and other risks and opportunities due to climate change	35, 51-52, 72		
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#### GRI 302: Energy 2016

302-1	Energy consumption within the organisation	69		Yes
302-2	Energy consumption outside of the organisation	70		
302-3	Energy intensity	70		Yes
302-4	Reduction of energy consumption	69		
302-5	Reductions in energy requirements of products and services	183-185		

#### GRI 305: Emissions 2016

305-1	Direct (Scope 1) GHG emissions	64-66		Yes
305-2	Energy indirect (Scope 2) GHG emissions	67-68		Yes
305-3	Other indirect (Scope 3) GHG emissions	67-68		
305-4	GHG emission intensity	70, 67		Yes
305-5	Reduction of GHG emissions	58-64, 66-67		

### E2 Pollution

#### GRI 3: Material topics 2021

3-3	Management of material topics	73-74		
<b>GRI 303: Water and effluents 2028</b>				
303-2	Management of water discharge-related impacts	73-75		
<b>GRI 305: Emissions 2016</b>				
305-6	Emissions of ozone-depleting substances (ODS)		Not applicable: ACCIONA Energía does not use ozone-depleting gases in its facilities.	
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	74-75		
<b>GRI 306: Effluents and waste 2016</b>				
306-3	Significant spills	76		
<b>E3 Water and Marine Resources</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	76-77		
<b>GRI 303: Water and effluents 2018</b>				
303-1	Interactions with water as a shared resource	76-77		
303-2	Management of water discharge-related impacts	76-79		
303-3	Water withdrawal	80-81, 277-278		
303-4	Water discharge	80-81, 277-278		
303-5	Water consumption	80-81, 277-278		Yes
<b>E4 Biodiversity and Ecosystems</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	82-86		
<b>GRI 304: Biodiversity 2016</b>				
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	90		
304-2	Significant impacts of activities, products, and services on biodiversity	82-86		
304-3	Habitats protected or restored	91-92		
304-4	UCN Red List species and national conservation list species with habitats in areas affected by operations	91		
<b>E5 Resource Use and Circular Economy</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	93-94		
<b>GRI 301: Materials 2016</b>				
301-1	Materials used by weight or volume	97-99		Yes
301-2	Recycled input materials used	97-99		Yes

301-3	Reclaimed products and their packaging materials	97-99		
<b>GRI 306: Waste 2020</b>				
306-1	Waste generation and significant waste-related impacts	93-94, 99		
306-2	Management of significant waste-related impacts	93-94, 99		
306-3	Waste generated	99		Yes
306-4	Waste diverted from disposal	99		Yes
306-5	Waste directed to disposal	99		Yes
<b>S1 Own Staff</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	101		
<b>GRI 202: Market Presence 2016</b>				
202-1	Ratios of standard entry level wage by gender compared to local		The average minimum salary is higher than the national minimum wage across the entire company.	
<b>GRI 203: Indirect Economic Impacts 2016</b>				
203-2	Significant indirect economic impacts	247-249, 259-260		
<b>GRI 401: Labour 2016</b>				
401-1	New employee hires and employee turnover	111, 274-275		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	113-115		
401-3	Parental leave	118-119		
<b>GRI 402: Labour-management relations 2016</b>				
402-1	Minimum notice periods for operational changes	102, 120-121		
<b>GRI 403: Occupational Health &amp; Safety 2018</b>				
403-1	Occupational health and safety management system	122-125		
403-2	Hazard identification, risk assessment and incident investigation	122-126		
403-3	Occupational health services	126-127		
403-4	Worker participation, consultation and communication on occupational health and safety	123-129		
403-5	Worker training on occupational health and safety	127		
403-6	Promotion of workers' health	126-127		

403-8	Workers covered by an occupational health and safety management system	129, 131		
403-9	Work-related injuries	129-131		Yes
403-10	Work-related ill health	126		
<b>GRI 404: Training &amp; Education 2016</b>				
404-1	Average hours of training per year per employee	160-161		
404-2	Programmes for upgrading employee skills and transition assistance programmes	154-159		
404-3	Percentage of employees receiving regular performance and career development reviews	151-152		
<b>GRI 405: Diversity and equal opportunity 2016</b>				
405-1	Diversity of governing bodies and employees	274, 146, 274-275, 200		Yes
405-2	Ratio of basic salary and remuneration of women to men	113, 277		
<b>GRI 406: No discrimination 2016</b>				
406-1	Cases of discrimination and corrective measures undertaken	208-210		
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>				
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	170-171, 169-172		
<b>GRI 408: Child Labour 2016</b>				
408-1	Operations and suppliers at significant risk for incidents of child labour	161-162, 170-171, 169-172		
<b>GRI 409: Forced or Compulsory Labour 2016</b>				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	161-162, 170-171, 169-172		
<b>S2 Value Chain Workers</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	168-172		
<b>GRI 403: Occupational Health &amp; Safety 2018</b>				
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	125, 168, 219		
<b>GRI 408: Child Labour 2016</b>				
408-1	Operations and suppliers at significant risk for incidents of child labour	161-162, 167-172		
<b>GRI 409: Forced or Compulsory Labour 2016</b>				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	161-162, 218-223		
<b>S3 Affected Groups</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	173		

<b>GRI 202: Market Presence 2016</b>				
202-2	Proportion of senior management hired from the local community	276		
<b>GRI 203: Indirect Economic Impacts 2016</b>				
203-1	Infrastructure investments and services supported	4-11, 259-260		
203-2	Significant indirect economic impacts	248-249, 259-260		
<b>GRI 204: Procurement impacts 2016</b>				
204-1	Proportion of spending on local suppliers	226		
<b>GRI 410: Security Practices 2016</b>				
410-1	Security personnel trained in human rights policies or procedures	161-167		
<b>GRI 413: Local Communities 2016</b>				
413-1	Operations with local community engagement, impact assessments and development programmes	181-182		Yes
413-2	Operations with significant actual and potential negative impacts on local communities	173-174		
<b>S4 Consumers and End Users</b>				
<b>GRI 3: Material topics 2021</b>				
3-3	Management of material topics	183-186		
<b>GRI 416: Customer Health and Safety 2016</b>				
416-1	Assessment of the health and safety impacts of product and service categories	186-187		
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	191-192		
<b>GRI 417: Marketing and Labelling 2016</b>				
417-1	Requirements for product and service information and labelling	194-195		
417-2	Incidents of non-compliance concerning product and service information and labelling	187, 191-192		
417-3	Incidents of non-compliance concerning marketing communications	187, 191-192		
<b>GRI 418: Customer Privacy 2016</b>				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	194-195		
<b>G1 Taxation and Business Conduct</b>				
<b>GRI 3: Material topics 2021</b>				

3-3	Management of material topics			
<b>GRI 201: Economic performance 2016</b>				
201-1	Direct economic value generated and distributed	15 Consolidated Financial Statements 2023 (p. 4-9)		
201-3	Defined benefit plan obligations and other retirement plans	Consolidated Financial Statements 2023 (p. 4-9)		
201-4	Financial assistance received from government	236-237		
<b>GRI 205: Anti-corruption 2016</b>				
205-1	Operations assessed for risks related to corruption	205-27, 209-210		
205-2	Communication and training about anti-corruption policies and procedures	211-212		
205-3	Confirmed incidents of corruption and actions taken	211		
<b>GRI 206: Anti-competitive behaviour 2016</b>				
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	219, 235		
<b>GRI 207: Tax 2019</b>				
207-1	Approach to tax	233-237		
207-2	Tax governance, control and risk management	233-237		
207-3	Stakeholder engagement and management concerns related to tax	32-33, 233-237		
207-4	Country-by-country reporting	236	The content required under GRI 207-4.b.v and GRI 207-4.b.vii involves unavailable information. The company will disclose this information in future years.	
<b>GRI 308: Supplier Environmental Assessment 2016</b>				
308-1	New suppliers that were screened using environmental criteria	218-219, 224, 229		
<b>GRI 414: Supplier Social Assessment 2016</b>				
414-1	New suppliers that were screened using social criteria	218-228, 230-231		
<b>GRI 415: Public policy 2016</b>				

415-1	Political contributions	207, 215	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.
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## 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 Energía and reporting criteria.

		Section	GRI Standards Reporting Criteria	Pages
<b>General Topics</b>				
<b>Business Model</b>	Brief description of the group's business model	01 Designing a better planet	GRI 2-6	4-15
	Markets where it operates	Designing a better planet	GRI 2-1 GRI 2-6	14
	Organisational objectives and strategies	02 Sustainability management and Double materiality	GRI 2-6	4-15
	Key factors and trends that could affect the future outlook	02 Sustainability management and Double materiality	GRI 2-6	4-15
<b>General</b>	Reporting framework	09 Annexes - About this Report	GRI 1	268-271
<b>Management Approach</b>	Description of applied policies	02 Sustainability management and Double materiality	GRI 2-23 GRI 2-24	24-26
	Results of these policies	02 Sustainability management and Double materiality	GRI 3-3	44-46
	Main risks related to those aspects linked to the group's activities	02 Sustainability management and Double materiality	GRI 2-16	24, 33-36, 38, 46
<b>Environmental matters</b>				
<b>Environmental management</b>	Current and foreseeable effects of the business activities on the environment and, where applicable, on health and safety	E1 Climate Change, E2 Pollution, E3, Water and Marine Resources, E4 Biodiversity and Ecosystems, E5 Resources and Circular Economy	GRI 3-3	47-72, 73-75, 76, 81, 82-87, 90-92, 93, 97-99
	Environmental assessment or certification procedures	S4- Customers and End Consumers	GRI 3-3	186
	Resources dedicated to the prevention of environmental risks	E4 Biodiversity and Ecosystems	GRI 3-3	92
	Application of the precautionary principle	E4 Biodiversity and Ecosystems	GRI 3-3	86-87
	Number of provisions and guarantees for environmental risks	Consolidated Financial Statements of ACCIONA, S.A.	GRI 3-3	92
<b>Pollution</b>	Measures to prevent, reduce or repair carbon emissions	E1 Climate Change	GRI 305-5	58-64, 66-67
<b>Circular economy and waste prevention and management</b>	Measures for prevention, recycling, reuse, other forms of recovery and disposal	E5 Resources and circular economy	GRI 306-2 (version 2020)	93-94, 99
	Actions to combat food waste	N/A	-	See note 12
<b>Sustainable use of resources</b>	Water usage and water supply according to local constraints	E3 Water and marine resources	GRI 303-5 (version 2018)	80-81, 277-278
	Consumption of raw materials and measures taken for more efficient use	E5 Resources and circular economy	GRI 303-1	76-77
	Direct and indirect energy consumption	E1 Climate Change	GRI 302-1	69

<sup>12</sup> Due to the nature of ACCIONA Energía's business and on the basis of the materiality analysis, the information requested is not useful to its report.

	Measures taken to improve energy efficiency	E1 Climate Change	GRI 302-4	63-64, 66, 68
	Use of renewable energies	E1 Climate Change	GRI 302-1	69
Climate change	Important elements of greenhouse gas emissions generated as a result of the company's activities	E1 Climate Change	GRI 305-1 GRI 305-2 GRI 305-3	64-66 67-68
	Measures taken to adapt to the consequences of climate change	E1 Climate Change	GRI 201-2 TCFD <sup>13</sup>	35, 51-52, 72
	Voluntary medium and long-term reduction targets set to reduce greenhouse gas emissions and the measures implemented to that end	E1 Climate Change	GRI 305-4 GRI 305-5	58-64, 66-67
Protecting biodiversity	Steps taken to preserve or restore biodiversity	E4 Biodiversity and ecosystems	GRI 304-3	91-92
	Impacts caused by activities or operations in protected areas	E4 Biodiversity and ecosystems	GRI 304-1	91-92
<b>Social and personnel-related questions</b>				
Employment	Total number and breakdown of employees by country, gender, age, and professional category	S1 Own Staff and Annex of itemised indicators	GRI 2-7 GRI 405-1	17, 103-104, 108, 273-277 274, 146, 274-275, 200
	Total number and breakdown of types of employment contracts	S1 Own Staff and Annex of itemised indicators	GRI 2-7 GRI 405-1	17, 103-104, 108, 273-277 274, 146, 274-275, 200
	Annual average per type of contract (permanent, temporary and part-time) and by gender, age and professional category	S1 Own Staff and Annex of itemised indicators	GRI 2-7 GRI 405-1	17, 103-104, 108, 273-277 274, 146, 274-275, 200
	Number of terminations by gender, age and professional category	S1 Own Staff and Annex of itemised indicators	GRI 401-1	111, 274-275
	Gender pay gap	S1 Own Staff and Annex of itemised indicators	GRI 405-2	113, 277
	Disaggregated average salaries and their evolution by gender, age, professional category or equal value	S1 Own Staff and Annex of itemised indicators	GRI 405-2	113, 277
	Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payments to long-term savings schemes and any other benefits disaggregated by gender	S1 Own Staff and Annual Remuneration Report, ACCIONA, S.A.	GRI 405-2	113, 277
	Implementation of workplace disconnection policies	S1 Own Staff	GRI 3-3	118
	Employees with disabilities	S1 Own Staff	GRI 405-1	147-150
Organisation of work	Working hours organisation	S1 Own Staff	GRI 3-3	118-119
	Hours of absenteeism	S1 Own Staff	GRI 403-9 (Version 2018)	
	Measures intended to promote work-life balance and co-responsible parenting by both parents	S1 Own Staff	GRI 401-2 GRI 401-3	113-115 118-119
Health and safety	Health and safety conditions in the workplace	S1 Own Staff	GRI 403-1 GRI 403-2 GRI 403-3 GRI 403-7 (Version 2018)	122-127
	Workplace accidents, in particular frequency and severity, disaggregated by gender	S1 Own Staff	GRI 403-9 GRI 403-10 (Version 2018)	129-131 126
	Occupational diseases, disaggregated by gender	S1 Own Staff	GRI 403-9 GRI 403-10	126

<sup>13</sup> TCFD: the information on climate change included in the report is consistent in all material aspects with the recommendations made by the "Task-force on Climate-related Financial Disclosures" (TCFD).

			(Version 2018)	
Labour relations	Dialogue in the workplace, including procedures to inform, consult and negotiate with employees.	S1 Own Staff	GRI 3-3	101, 102, 120-121
	Percentage of employees covered under collective bargaining agreement, by country	S1 Own Staff	GRI 2-30	102, 120-121
	The balance of collective bargaining agreements, particularly in the areas of occupational health and safety	S1 Own Staff	GRI 403-3	126-127
Training	Training policies implemented	S1 Own Staff	GRI 404-2	154-159
	Total hours of training per professional category	S1 Own Staff	GRI 404-1	160-161
Accessibility	Universal accessibility for people with disabilities	S1 Own Staff	GRI 3-3	147-150
Equality	Measures taken to promote equal treatment and opportunities for women and men	S1 Own Staff	GRI 3-3	133-150
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March on effective equality for men and women)	S1 Own Staff	GRI 3-3	135, 139
	Measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for persons with disabilities	S1 Own Staff	GRI 3-3	133-150,
	Policy against all types of discrimination and, where appropriate, diversity management.	S1 Own Staff	GRI 3-3	
<b>Information on respect for human rights</b>				
Human rights	Application of due diligence procedures in the area of human rights, preventing the risk of human rights violations and measures to mitigate, manage and repair possible abuse	S1 Own Staff	GRI 2-25 GRI 412-1	61-62, 73-74, 76-77, 87-89, 162-164, 169, 177-178, 190-191
	Human rights violations reported	G1 Business conduct	GRI 406-1	208-210
	Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organisation regarding freedom of association and the right to collective bargaining, the elimination of job discrimination, the elimination of forced labour and the effective abolition of child labour.	S1 Own Staff	GRI 406-1 GRI 407-1 GRI 408-1 GRI 409-1	208-210, 170-171, 169-172, 161-162,
<b>Disclosures on the fight against corruption and bribery</b>				
Corruption and bribery	Measures adopted to prevent corruption and bribery	G1 Business conduct	GRI 3-3 GRI 205-2	211-212
	Measures for the prevention of money laundering	G1 Business conduct	GRI 3-3 GRI 205-2	211-212
	Contributions to foundations and non-profit organisations	G1 Business conduct	GRI 2-28 GRI 201-1	215-217
<b>Information about the company</b>				
The company's commitment to sustainable development	The impact of the company's operations on local employment and development	S3 Affected communities, Commitment to the community	GRI 203-2	247-249, 259-260
	The impact of the company's operations on local resident and the territory	Commitment to the community O8 Impact per region	GRI 413-1 GRI 413-2	247-249, 259-260, 181-182, 173-174
	Relations with key members of local communities and ways of dialogue with them	S3 Affected communities, Commitment to the community	GRI 2-29 GRI 413-1	32-33, 175-178
	Partnership and sponsorship actions	G1 Business conduct	GRI 201-1	215-217
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy	Sustainable supply chain	GRI 308-1 GRI 414-1	218-231
	Consideration of social and environmental responsibility in relations with suppliers and subcontractors	Sustainable supply chain	GRI 308-1 GRI 414-1	218-231

	Supervision systems and audits and their result	Sustainable supply chain	GRI 308-1 GRI 414-1	222, 224-225
<b>Consumers</b>	Measures to promote consumer health and safety	S4 Clients and end Consumers	GRI 416-1	186-187
	Complaint procedures, complaints received and complaint resolution	S4 Clients and end Consumers	GRI 418-1	190-192
<b>Tax Information</b>	Profits earned country-by-country	Responsible taxation	GRI 201-1	236
	Corporate income tax paid	Responsible taxation	GRI 207-4	236
	Public grants received	Responsible taxation	GRI 201-4	236-237
<b>Taxonomy Regulation requirements</b>		Annex of itemized indicators	EU Regulation 2020/852	European Taxonomy for Environmentally Sustainable Activities

**Index of contents according to Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting rules**

<b>DISCLOSURE REQUIREMENTS</b>	<b>CONTENTS</b>		<b>PAGES OR DIRECT RESPONSE</b>
<b>THEMATIC ENVIRONMENTAL STANDARDS</b>			
<b>NEIS E1 Climate Change</b>			
Strategy	RD E1-1	Transition plan for climate change mitigation	63-64
Management of incidents, risks and opportunities	RD E1-2	Policies related to climate change mitigation and adaptation	47
	RD E1-3	Actions and resources in relation to climate change policies	48-72
	RD E1-4	Targets related to climate change mitigation and adaptation	48-72
Parameters and targets	RD E1-5	Energy consumption and combination	69-71
	RD E1-6	Scope 1, 2 and 3 gross GHG emissions and total GHG emissions	65-68
	RD E1-7	GHG removals and GHG mitigation projects financed by carbon credits	Planned for 2024
	RD E1-8	System to determine the internal carbon price	62
	RD E1-9	Expected financial impacts of material physical and transitional risks and potential opportunities related to climate change	48-57
<b>NEIS E2 Pollution</b>			
Management of incidents, risks and opportunities	RD E2-1	Pollution-related policies	74
	RD E2-2	Pollution-related actions and resources	74
Parameters and targets	RD E2-3	Pollution-related targets	74
	RD E2-4	Air, water and soil pollution	75
	RD E2-5	Substances of concern and substances of very high concern	Planned for 2024
	RD E2-6	Expected financial impacts of pollution-related incidents, risks and opportunities	Planned for 2024
<b>NEIS E3 Water and Marine Resources</b>			
Management of incidents, risks and opportunities	RD E3-1	Policies related to water and marine resources	78-79
	RD E3-2	Actions and resources related to water and marine resources	79
Parameters and targets	RD E3-3	Targets related to water and marine resources	80
	RD E3-4	Water consumption	81
	RD E3-5	Expected financial impacts of water and marine-related impacts, risks and opportunities	Planned for 2024
<b>NEIS E4 Biodiversity and Ecosystems</b>			
Strategy	RD E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Planned for 2024
Management of incidents, risks and opportunities	RD E4-2	Policies related to biodiversity and ecosystems	86
	RD E4-3	Actions and resources related to biodiversity and ecosystems	86-89, 91-92
Parameters and	RD E4-4	Targets related to biodiversity and ecosystems	90

targets	RD E4-5	Incident parameters related to biodiversity and ecosystem changes	90-91
	RD E4-6	Expected financial impacts of risks and opportunities related to biodiversity and ecosystems	Planned for 2024

### NEIS E5 Resource use and circular economy

Management of incidents, risks and opportunities	RD E5-1	Policies related to resource use and circular economy	95
	RD E5-2	Actions and resources related to resource use and circular economy	95-97
Parameters and targets	RD E5-3	Targets related to resource use and circular economy	97-98
	RD E5-4	Resource inputs	98
	RD E5-5	Resource outflows	98-99
	RD E5-6	Expected financial impacts of incidents, risks and opportunities related to resource use and circular economy	Planned for 2024

### SOCIAL THEMATIC STANDARDS

#### NEIS S1 Own Staff

Management of incidents, risks and opportunities	RD S1-1	Policies relating to own staff	102
	RD S1-2	Processes for collaborating with own employees and employee representatives for incidents	102
	RD S1-3	Processes for redressing negative incidents and channels for own workers to voice their concerns	Their report is distributed throughout S1 by the material sub-items
	RD S1-4	Adoption of measures related to material impacts on own staff, approaches to mitigate material risks and take advantage of material opportunities related to own staff and effectiveness of such actions	Their report is distributed throughout S1 by the material sub-items
Parameters and targets	RD S1-5	Targets related to managing negative incidents of relative importance, driving positive incidents and managing risks and opportunities of relative importance	Their report is distributed throughout S1 by the material sub-items
	RD S1-6	Characteristics of the company's employees	108, 138, 146, 273-274
	RD S1-7	Characteristics of non-salaried workers in the enterprise's own workforce	Planned for 2024
	RD S1-8	Coverage of collective bargaining and social dialogue	120-121
	RD S1-9	Diversity parameters	133, 137-138, 142, 146
	RD S1-10	Adequate wages	117
	RD S1-11	Social Protection	111
	RD S1-12	People with disabilities	147-150
	RD S1-13	Training and capacity building parameters	151-161
	RD S1-14	Health and safety parameters	122-132
	RD S1-15	Work-life balance parameters	118-119
	RD S1-16	Pay parameters (pay gap and total pay)	141-143
	RD S1-17	Serious human rights incidents, complaints and occurrences	No serious incidents

#### NEIS S2 Workers in the Value Chain

Management of incidents, risks and opportunities	RD S2-1	Policies related to value chain workers	168-169
	RD S2-2	Processes for collaborating with value chain workers on incidents	Planned for 2024
	RD S2-3	Processes for redressing negative incidents and channels for value chain workers to voice their concerns	169

	RD S2-4	Adoption of measures related to incidents of relative importance regarding workers in the value chain, approaches to manage risks of relative importance and exploit opportunities of relative importance related to workers in the value chain and the effectiveness of such actions	170-172
<b>Parameters and targets</b>	RD S2-5	Targets related to managing negative incidents of relative importance, driving positive incidents and managing risks and opportunities of relative importance	228

#### NEIS S3 Affected Groups

<b>Management of incidents, risks and opportunities</b>	S3-1	Policies related to affected groups	174-175
	RD S3-2	Processes to collaborate with affected groups for incidents	175-178
	RD S3-3	Processes for redressing negative impacts and channels for affected groups to voice their concerns	177-178
	RD S3-4	Adoption of measures related to incidents of relative importance regarding affected groups, approaches to manage risks of relative importance and exploit opportunities of relative importance related to affected groups and effectiveness of such actions	179-180
<b>Parameters and targets</b>	RD S3-5	Targets related to managing negative incidents of relative importance, driving positive incidents and managing risks and opportunities of relative importance	181-182

#### NEIS S4 Consumers and End-Users

<b>Management of incidents, risks and opportunities</b>	RD S4-1	Policies related to consumers and end-users	185-186
	RD S4-2	Processes for engaging with consumers and end-users for incidents	187-191
	RD S4-3	Processes for redressing negative incidents and channels for consumers and end-users to voice their concerns	190-191
	RD S4-4	Adoption of measures related to incidents of relative importance regarding consumers and end-users, approaches to mitigate risks of relative importance and exploit opportunities of relative importance related to consumers and end-users and the effectiveness of such actions	192-193
<b>Parameters and targets</b>	RD S4-5	Targets related to managing negative incidents of relative importance, driving positive incidents and managing risks and opportunities of relative importance	189, 193-194

#### GOVERNANCE THEMATIC STANDARDS

#### NEIS G1 Business Conduct

<b>Management of incidents, risks and opportunities</b>	RD G1-1	Corporate culture and business conduct policies	204, 206-208
	RD G1-2	Supplier relationship management	218-228
	RD G1-3	Prevention and detection of corruption and bribery	210-213
	RD G1-4	Confirmed cases of corruption or bribery	213
	RD G1-5	Political influence and lobby activities	215-217
	RD G1-6	Payments practices	Planned for 2024

## Table of contents according to the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD)

ACCIONA Energía follows the TCFD recommendations regarding publication of information relating to climate change under the Climate Change chapter.

Areas	Recommended reports	Pages
Governance	Describe the management's role in assessing and managing climate-related risks and opportunities.	44-46
	Describe the board's oversight of climate-related risks and opportunities.	46
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	47-53, 70-71
	Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	57-64
	Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	61-64
Risk Management	Describe the organisation's processes for identifying and assessing climate-related risks.	47-48, 56-57
	Describe the organisation's processes for managing climate-related risks.	48-55, 70-71
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	47
Metrics and Targets	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	64-72
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	64-72
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	67-72





SWORN TRANSLATION

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Doña Silvina María GARRIDO GARDÉ, Traductora-Intérprete Jurada de INGLÉS, en virtud de título otorgado por el Ministerio de Asuntos Exteriores, Unión Europea y Cooperación, certifica que la que antecede es traducción fiel y exacta al INGLÉS de un documento redactado en ESPAÑOL.

En Galicia, a 19 ABR 2024

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SILVINA MARÍA GARRIDO GARDÉ  
Traductora-Intérprete Jurada de INGLÉS  
N.º 1081

Ms Silvina María GARRIDO GARDÉ, Sworn Translator-Interpreter of ENGLISH, appointed by the Ministry of Foreign Affairs, European Union and Cooperation, does hereby certify that this is a true and accurate translation into ENGLISH of a document in SPANISH.

In Galicia, on this 19 APR 2024

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SILVINA MARÍA GARRIDO GARDÉ  
Traductora-Intérprete Jurada de INGLÉS  
N.º 1081



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

Independent Verification Report of the  
Sustainability Report 2023

31 December 2023



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

## **Independent Assurance Report on the Sustainability Report of Corporación Acciona Energías Renovables, S.A. and subsidiaries for the financial year 2023**

*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.:

We have been requested by the management of Corporación Acciona Energías Renovables, S.A. to verify, with limited assurance, the attached Sustainability Report for the year ended 31 December 2023 of Corporación Acciona Energías Renovables, S.A. (hereinafter, the Parent Company) and subsidiaries (hereinafter, the Group) (hereinafter, 'the Report'), prepared in accordance with the Sustainability Reporting Standards of the Global Reporting Initiative (hereinafter GRI standards) and which in turn forms part of the Group's consolidated Management Report for 2023.

For the indicators detailed in the attached Appendix I, prepared in accordance with the GRI standards and listed in the "Table of contents of GRI" of the Report, the scope of our verification has been reasonable assurance.

Furthermore, in accordance with article 49 of the Commercial Code, we have carried out the verification, with limited assurance scope, of the Consolidated Statement of Non-Financial Information (hereinafter EINF) for the year ended 31 December 2023 of the Group, included in the Report, prepared in accordance with the contents set out in the current commercial regulations and following the criteria of the GRI standards, as mentioned for each subject in the "Table of Contents of Spanish Law 11/2018" of the aforementioned Report.

The content of the Report includes additional information to that required by the GRI standards and by current commercial regulations on non-financial information, which has not been the subject of our verification work. In this regard, our work has been limited exclusively to the verification of the information identified in the "Table of contents of GRI" and "Table of Contents of Spanish Law 11/2018", included in the attached Report.

### **Director's Responsibility**

The preparation of the attached Report included in the Group's Consolidated Directors' Report, as well as its content, is the responsibility of the Parent Company's directors. The Report has been prepared in accordance with the GRI standards, as mentioned for each subject in the table 'GRI Content Index' of the Report and, regarding the NFR, in accordance with the contents included in the current mercantile regulations and following the contents of selected GRI standards as mentioned for each subject in the "Table of Contents of Spanish Law 11/2018" of the Report.

These responsibilities also include designing, implementing and maintaining such internal control as is considered necessary to enable the Report to be free from material misstatement, whether due to fraud or error.



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

The Parent's directors are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the Report is obtained.

## **Our independence and quality management**

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We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Professional Accountants' International Code of Ethics for Professional Accountants (IESBA Code of Ethics), which is based on the fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behaviour.

Our firm applies the International Quality Management Standard (IQMS) 1, which requires the firm to design, implement and operate a quality management system that includes policies and procedures relating to compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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

## **Our responsibility**

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Our responsibility is to express our conclusions in an independent assurance report of limited assurance on reasonable assurance regarding the indicators detailed in Annex I based on the work performed. We conducted our work in accordance with the requirements of the current International Standard on Assurance Engagements 3000 Revised, 'Assurance Engagements Other than Audits and Reviews of Historical Financial Information' (ISAE 3000 Revised) issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC) and with the Performance Guidance on Assurance Engagements on Non-Financial Reporting issued by the Instituto de Censores Jurados de Cuentas de España (Spanish Institute of Chartered Accountants).

In a limited assurance engagement, the procedures performed vary in nature and timing, and are less extensive, than those performed in a reasonable assurance engagement and, therefore, the assurance provided is also less.

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

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

- Meetings with the Group's personnel to learn about the business model, policies and management approaches applied, the main risks related to these issues and to obtain the necessary information for the external review.



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- Analysis of the scope, relevance and completeness of the contents included in the Report for financial year 2023 based on the materiality analysis performed by the Group and described in the section ‘Double materiality analysis’, considering the contents required by current commercial regulations.
- Analysis of the processes for compiling and validating the data presented in the 2023 Report.
- Review of the information relating to the risks, policies and management approaches applied in relation to the material aspects presented in the report for financial year 2023.
- Verification, through testing, based on the selection of a sample, of the information relating to the contents included in the FY2023 Report and its appropriate compilation from the data provided by the information sources.
- Review of the reporting process at source for environmental and health and safety information at eight work centres, by means of remote and on-site visits and reviews, selected according to a risk analysis, considering quantitative and qualitative criteria.
- Obtaining a letter of representation from administrators and management.

We consider that the evidence we have obtained provides a sufficient and appropriate basis for our reasonable assurance and limited assurance conclusions.

### **Conclusion on indicators with reasonable assurance**

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In our opinion, the indicators listed in Annex I and detailed in the “Table of contents of GRI” of the attached report have been prepared, in all material respects, in accordance with GRI standards.

### **Conclusion on indicators with limited assurance**

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Based on the procedures performed in our audit and the evidence we have obtained, nothing has come to our attention that causes us to believe that:

- The Sustainability Report of Corporación Acciona Energías Renovables, S.A. and subsidiaries for the year ended 31 December 2023, has not been prepared, in all material respects, in accordance with GRI standards, as detailed in the “Table of contents of GRI” of the Report’.
- The ICFR of Corporación Acciona Energías Renovables, S.A. and subsidiaries for the year ended 31 December 2023, included in the report, has not been prepared, in all material respects, in accordance with the contents of current corporate regulations and following the criteria of the selected GRI standards, as mentioned for each subject in the “Table of Contents of Spanish Law 11/2018” of the Report.

### **Emphasis of matter**

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Based on Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investments, as well as on the basis of the



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delegated acts enacted pursuant to that Regulation, there is an obligation to disclose information on how and to what extent the company's activities are associated with eligible economic activities in relation to the environmental objectives of sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems (all other environmental objectives), and for certain new activities included in the climate change mitigation and adaptation objectives, for the first time for the 2023 financial year, in addition to the information on eligible and aligned activities already required for the 2022 financial year in relation to the climate change mitigation and adaptation objectives. Consequently, no comparative information on eligibility has been included in the Report in relation to the other environmental objectives listed above or to the new activities included in the 15 climate change mitigation and climate change adaptation objectives. Moreover, to the extent that information for 2022 was not required at the same level of detail as for 2023, the report does not provide strictly comparable disaggregated information. In addition, it should be noted that the directors of Corporación Acciona Energías Renovables, S.A. have included information on the criteria which, in their opinion, allow better compliance with the aforementioned obligations and which are defined in the 'European Taxonomy of Environmentally Sustainable Economic Activities' section of the accompanying report. Our conclusions have not been modified in relation to this issue.

## **Use and distribution**

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In accordance with the terms and conditions of our engagement letter, this report has been prepared for Corporación Acciona Energías Renovables, S.A. in connection with its Sustainability Report 2023 and, therefore, has no other purpose and cannot be used in any other context.

With respect to the Consolidated Non-Financial Information Statement, this report has been prepared in response to the requirement established in current Spanish mercantile regulations, and therefore may not be suitable for other purposes and jurisdictions..

KPMG Auditores, S.L.

Patricia Reverter

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**Annex I INDICATORS VERIFIED WITH REASONABLE SAFETY SCOPE**

No.	Name of the Indicator	Definition	Standard of reference
1	Employees, Own staff	Total number of employees, and breakdown by gender and region; Total number of permanent employees broken down by gender; Total number of permanent employees broken down by gender; Temporary employees by gender; Full-time and part-time employees, both by gender.	GRI 2-7
2	Scope1 GHG emissions	Gross value of direct GHG emissions (Scope 1) in metric tonnes of CO2 equivalent.	GRI 305-1
3	Scope 2 GHG emissions	The gross value of indirect GHG emissions from energy generation (Scope 2) in metric tonnes of CO2 equivalent.	GRI 305-2
4	Intensity of GHG emissions	Sum of Scope 1 and 2 emissions/Organisation specific parameter which in this case is Energy generation measured in M€ Energy Sales.	GRI 305-4
5	Energy consumption within the organisation	Sum of fuel consumptions from renewable and non-renewable fuel sources.	GRI 302-1
6	Energy intensity	Acciona Energía's internal energy consumption by activity parameter, which in this case is energy generation measured in M€ Energy Sales.	GRI 302-3
7	Water consumption	Sumatory of water consumed (own consumption) from groundwater, surface, rainwater and recycled sources.	GRI 303-5
8	Waste production	Total sum of waste generated by nature and destination.	GRI 306-3
9	Waste not destined for disposal	Sum of total recovered waste	GRI 306-4





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10	Disposed of waste	Sum of total waste destined for disposal	GRI 306-5
11	Materials used	Total resources consumed by weight and breakdown by renewable and non-renewable condition.	GRI 301-1
12	Recycled input	Total consumption of recycled resources	GRI 301-2
13	Diversity in governing bodies and employees	Diversity measured as a percentage in governing bodies and total staff in terms of gender.	GRI 405-1
14	Injuries due to accidents at work	Total number of occupational accidents broken down by sex and number of occupational diseases broken down by sex	GRI 403-9
15	Operations with local community participation, impact assessments and development programs	Projects with ISM procedures in place (Social Impact Management - Acciona Energy and Acciona's own procedure) - list of projects. Percentage of operations with some of the local community engagement mechanisms detailed by GRI and by the GIS methodology, from impact assessments to communication channels.	GRI 413-1