


ACCIONA ENERGÍA

Sustainability Report 2020

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ACCIONA ENERGÍA AT A GLANCE

OUR COMPANY

INTRODUCTION TO ACCIONA ENERGÍA

ACCIONA Energía is leading the corporate fight to mitigate the effects of the climate emergency and accelerate change towards a decarbonised energy model.

A trailblazer in the initial phases of the renewable sector, the company is the largest 100 % clean energy company in the world. It is currently the leader in the development, engineering, construction, operation and maintenance of renewable assets, supported by a stable growth model and guaranteed with near 14,000 MW of capacity installed or to start construction in 2021 and 2022.

ACCIONA Energía strengthens its innovative and technical capacity in developing renewable technologies, such as wind and photovoltaic power, with a greater degree of maturity and competitiveness. With near 10,700 MW of its own power installed in 16 countries across 5 continents it promotes investments in the renewable energy sector and low-carbon activities.

ACCIONA announced in February 2021 its intention to IPO its energy business during the first half of this year for placement in the Spanish market. The company's General Shareholders' Meeting, in extraordinary session, authorized the sale of shares of ACCIONA Energía, with the intention to float. The free float will be at least 25% of the capital of the new listed company. The intention of ACCIONA's Board of Directors is to maintain a stake of around 70% of ACCIONA Energía.

OUR RENEWABLE TECHNOLOGIES



SOLAR PHOTOVOLTAIC ENERGY

ACCIONA Energía is a pioneer in installation of large photovoltaic plants with capacity greater than 1MW. We build and operate some of the largest solar installations on the planet.



WIND POWER

ACCIONA Energía is a global leader in development, construction, operation and maintenance of wind power facilities, with more than 25 years of experience.



HYDROELECTRIC ENERGY

ACCIONA Energía has gained vast experience across the entire value chain of hydroelectric technology. This renewable energy is currently our second largest source of power generation after wind power.



SOLAR THERMAL ENERGY

ACCIONA Energía led a revival of solar thermal energy in 2007. The company boasts extensive experience in the engineering, procurement, construction and operation of solar thermal plants.



BIOMASS

At ACCIONA Energía, we are experts in sustainable biomass solutions across the entire value chain, including the design, construction and operation of major biomass plants for large-scale power generation.



MAIN FIGURES

ACCIONA ENERGÍA IN FIGURES

ACCIONA Energía is the greatest independent worldwide operator engaged in producing electricity solely from renewable sources.



	2018	2019	2020
FINANCIAL PERFORMANCE			
Sales (million €)	2,206	1,997	1,765
EBITDA (million €)	743	845	831
Gross CAPEX (million €)	554	608	755
NON - FINANCIAL PERFORMANCE			
Workforce at year-end	1,587	1,629	1,543
Women executives (% of total executives)	12.5	10.3	10.5
Accident rate: employee frequency rate	0.5	0.4	0.1
Emissions generated (million tonnes of CO2)	0.038	0.030	0.026
Emissions avoided (million tonnes of CO2)	14.7	13.1	13.2
Total innovation figure (million €)	61.8	75.4	78.3
Global customer satisfaction index (%)	100	98	99
Projects with Social Impact Management (no.)	17	22	32
Projects with social-economic impact measurement	20	14	19

S U S T A I N A B I L I T Y G O V E R N A N C E

SUSTAINABILITY AS A CORE

SUSTAINABILITY GOVERNANCE

ACCIONA has a model for monitoring and managing its sustainability commitments, with the main objectives being transparency and continuous improvement.

Since 2009, the Board of Directors at ACCIONA has a Sustainability Committee as the body responsible for leading sustainability-related actions.

Functions of the Sustainability Committee:

- Identify and guide the group's policies, objectives, good practices, and sustainability and corporate social responsibility programmes.
- Evaluate, monitor and review the execution plans for the policies formulated by the group's executives.
- Periodically review the internal control and management systems and the degree of compliance with these policies.
- Draft the annual Sustainability Report, which is submitted to the Board of Directors for approval.
- Submit the sustainability and corporate social responsibility programmes, objectives and policies to the Board of Directors along

The Corporate Sustainability Area coordinates and promotes the initiatives and commitments contained in the Sustainability Master Plans, defined as specific targets for ACCIONA Energía and other business sectors. This area reports directly to the Sustainability Committee and one of the members of the Management Committee, who is the corporate representative responsible for sustainability.

The corporate sustainability function has evolved from an ESG (environment, social and governance) reporting approach to one that is geared towards maximizing the impact of the company's solutions. This approach is aided by higher performance efficiency thanks to digitization and a greater effort to highlight ACCIONA Energía's leadership on non-financial matters.

The excellence governance is recognized globally:

ACCIONA closed 2020 as the leading electricity utility company in sustainability, according to the Sustainability Yearbook 2021, elaborated by S&P Global. ACCIONA, with a score of 90 out of 100, leads the electricity utility sector.

As a result, S&P Global award ACCIONA the **SAM Gold Class**, a distinction that places it on the podium of the best utilities in the world in terms of sustainability.

Sustainability Award
Gold Class 2021
S&P Global

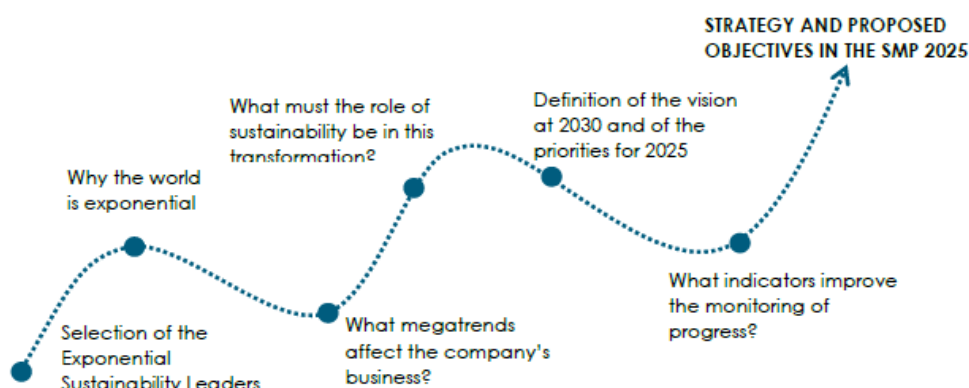
SUSTAINABILITY AS A CORE

CONSTRUCTING THE SUSTAINABILITY STRATEGY

The New Sustainability Master Plan 2025

The purpose of the Sustainability Master Plan (SMP) 2025 is to encourage ACCIONA to reimagine infrastructures. ACCIONA invests in, develops and operates infrastructure assets that can make our planet sustainable. In short, making the company a recognised leader in developing basic infrastructure assets with an added value, with people and the planet in mind; in a word, regenerative. The SMP applies to ACCIONA Energía as well as ACCIONA's policies, plans and programmes.

ACCIONA's ambition with the SMP 2025 is to
increase investment and double its impact



Exponential Sustainability Leaders

The first part of the approach has been promoted by a group of 26 international professionals from ACCIONA's different business units. The diversity of these experts' specialisation has contributed an overall vision of the business.

The mission of the Exponential Sustainability Leaders has been to identify and assess the market trends affecting the company. Using these as a starting point, the pillars of the plan have been defined through a process of co-creation.

The factors affecting ACCIONA are a reflection of the global megatrends identified in works like the WBCSD Vision 2050 and the Global Infrastructure Hub's Infrastructure Futures Report. These initiatives resulted in the identification of 25 trends.

SUSTAINABILITY AS A CORE

CONSTRUCTING THE SUSTAINABILITY STRATEGY

Relations with stakeholders

Communication and constant dialogue are the cornerstones of ACCIONA’s relationship with its stakeholders, namely the individuals and organisations that are directly or indirectly involved in the activity of the company. In short, employees, customers, local communities, partners, suppliers and subcontractors, public administrations and regulatory bodies, investors and analysts, and the media. The Sustainability Committee of the ACCIONA Board of Directors drafted and approved a Stakeholder Relations Policy in 2018. This policy identifies the main stakeholders and outlines the company’s principles for learning about the needs and expectations of its stakeholders.

Materiality Analysis

Whereas the study of risks and trends is carried out with a one-year timeframe, other tests – called materiality analyses – have a five-year timeframe. This analysis provides information on the importance of matters related to the business strategy and determine the expectations and needs of the interested parties. In 2020, they coincided with the drawing up of the SMP 2025, and so they have fulfilled the dual purpose of providing material for the new SMP.

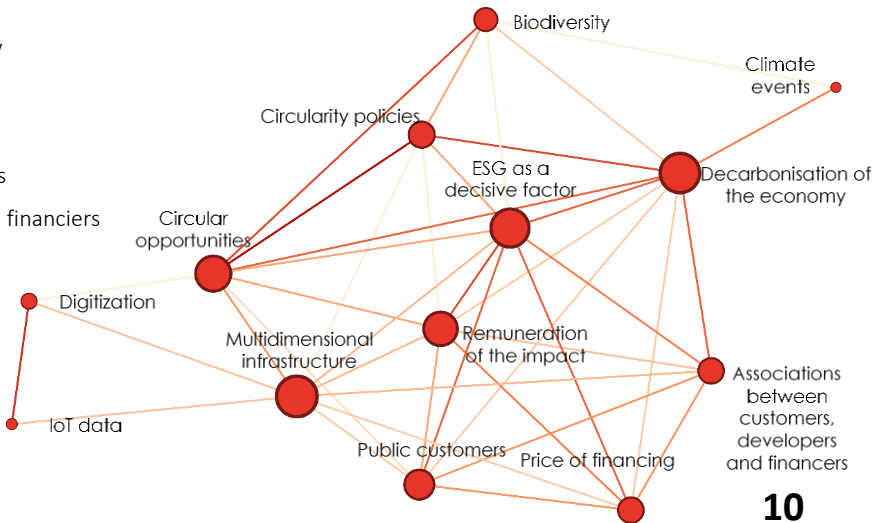
The materiality matrix shows on one axis the internal vision of impact and probability, and on the other the external vision of the importance of each trend. The external vision is obtained through consultations with international bodies and sectoral institutions, press analysis and information requirements provided by investors. The consultations are made taking into account the countries where ACCIONA has the greatest activity: World Wildlife Fund (WWF), Chilean Association of Renewable Energies and Storage (ACERA), Spanish Association of Renewable Energies Companies (APPA), American Wind Energy Association (AWEA), International Energy Agency (IEA), etc.

This analysis highlights the issues “financing price”, “decarbonisation of the economy”, “Climatic events”, and “ESG as a decisive factor”.

TRADITIONAL MATERIALITY ANALYSIS FOR ACCIONA ENERGÍA

100%	Financing price
81%	Decarbonisation of the economy
73%	Climatic events
55%	ESG as a decisive factor
51%	Multi-dimension infraestructures
48%	Assoc. of clients, developers and financiers
46%	Impact remuneration
42%	Digitisation
38%	IoT data
33%	Public clients
26%	Biodiversity
17%	Circular opportunities
14%	Circular politics

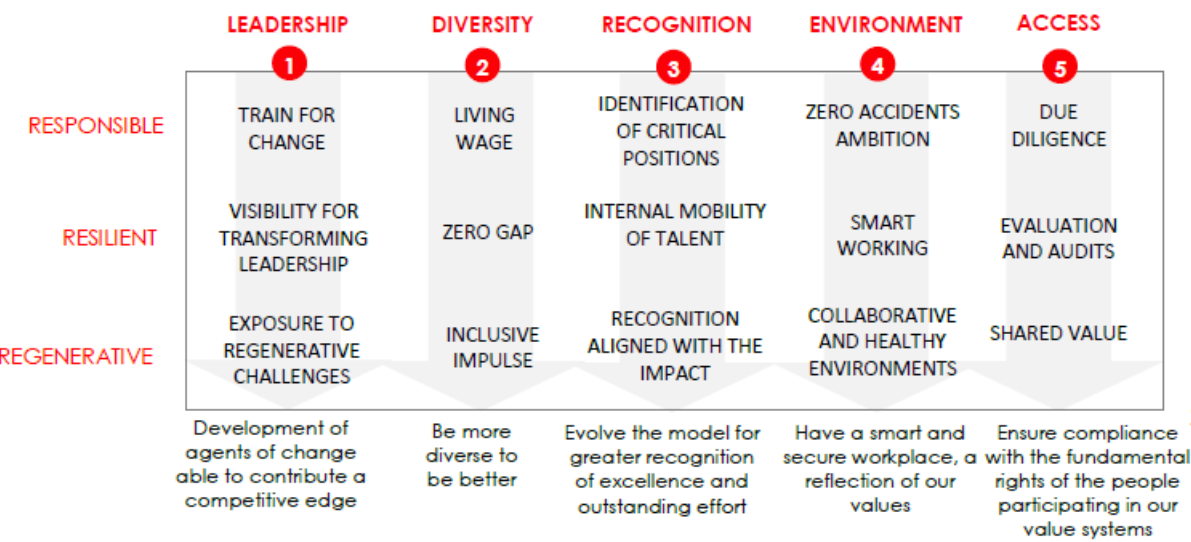
NETWORK OF RELATIONSHIPS BETWEEN THE MATERIAL ISSUES FOR ACCIONA



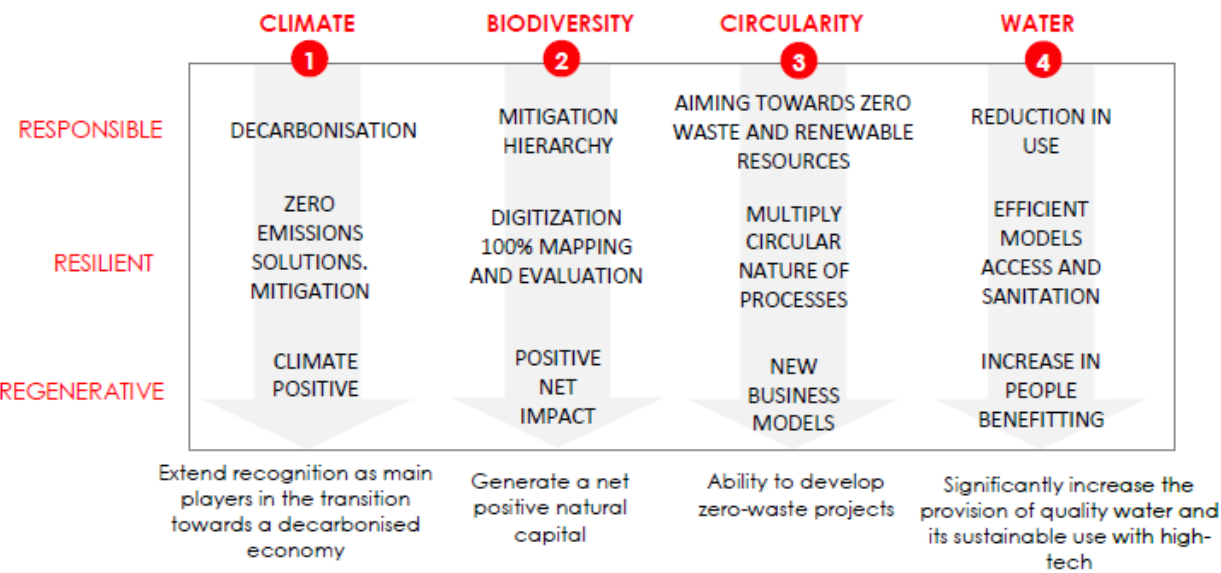
SUSTAINABILITY MASTER PLAN

The results of the relationships map have been used to group together the works in the Sustainability Master Plan into pillars. The SMP 2025 is composed of 4 pillars. Each of the four pillars of the SMP 2025 has various areas of action and an established route that includes activities ranging from responsible to resilient, taking in those that contribute a regenerative impact. They are as follows:

PEOPLE CENTRIC | *quality of life, inclusive future* | Our advantage comes from people

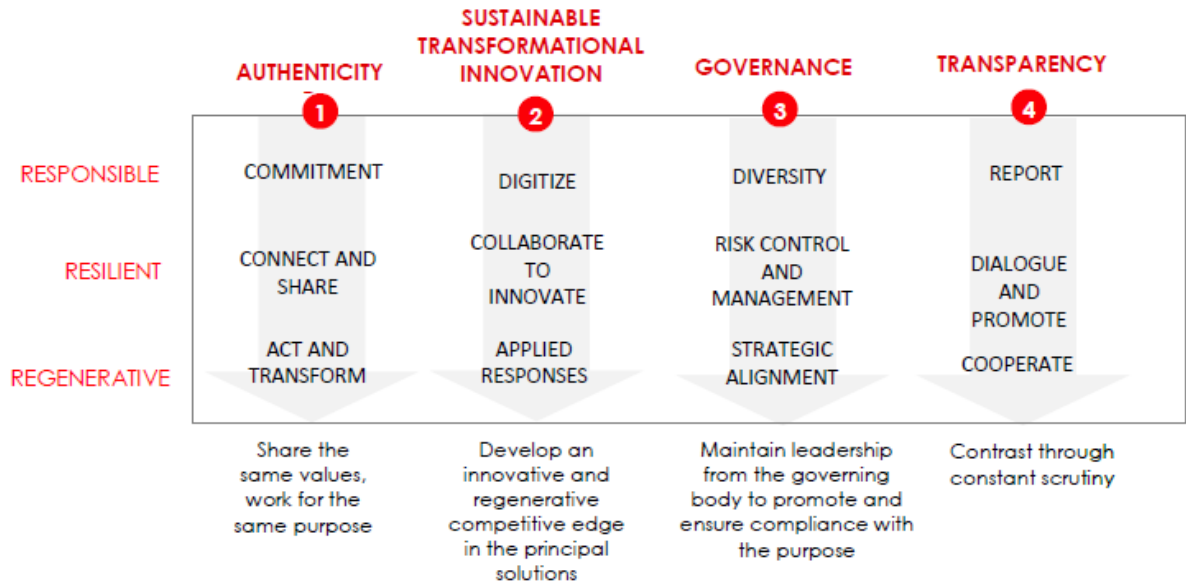


PLANET POSITIVE | *from net zero to positive contribution* | Invest to regenerate the planet

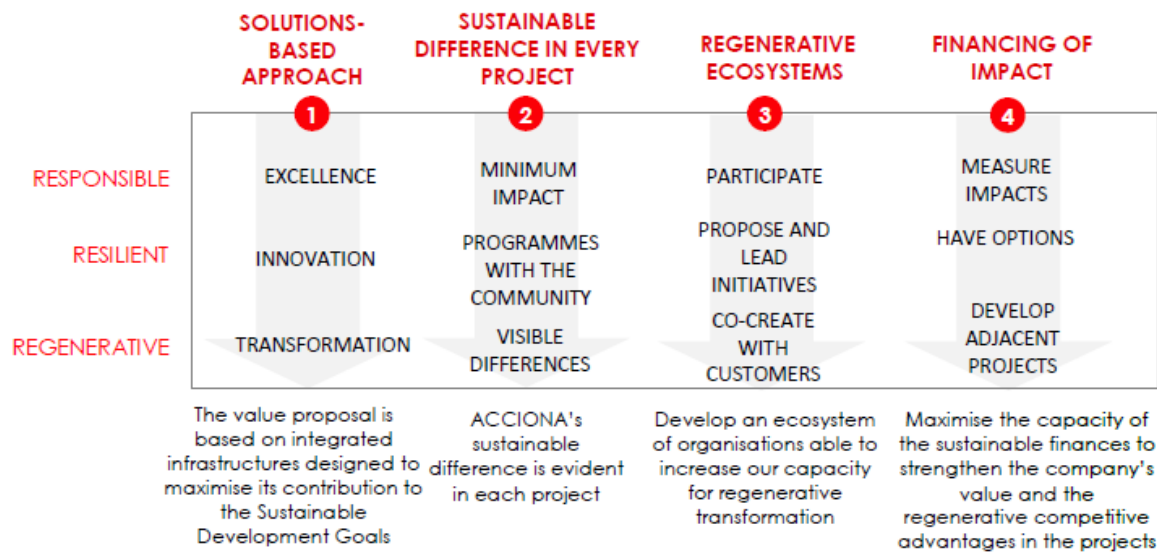


SUSTAINABILITY MASTER PLAN

EXPONENTIAL LEADERSHIP | *authenticity, transparency* | We pursue a purpose



INTEGRATE TO TRANSFORM | *connect to impact* | Difference in every project



The strategic lines take the form of indicators and objectives proposed by the corporate areas with direct responsibility for them. The objectives at 2025 will be reviewed to raise the level of ambition if necessary.

S U S T A I N A B I L I T Y P E R F O R M A N C E

SUSTAINABILITY
PERFORMANCE
PEOPLE CENTRIC

PEOPLE CENTRIC

LEADERSHIP

ACCIONA Energía promotes leadership models in which every employee can take responsibility and share the company’s purpose so that the whole organisation is aligned to meet the objectives

MANAGING KNOWLEDGE

Its people management model is based on the definition of roles as basic organisational units in which jobs that share a mission, responsibilities, knowledge and skills are grouped together.

This model makes it possible to pinpoint the skills needed to achieve objectives and fulfil business strategies. Within the professional development model, the company continues working towards the goal of favouring the development of each and every one of its professionals.

Global careers: the Technical Leaders programme

ACCIONA has created a Technical Leaders group comprising people who provide exceptional technical knowledge. The goal of this initiative is to recognise and support people with differential technical knowledge and skills, allowing ACCIONA Energía to continue positioning itself as a leading company in technical excellence, innovation and sustainability.

ACCIONA UNIVERSITY

Corporate University has the mission of ensuring training and ongoing development of the whole workforce, in line with the business needs. In addition to a corporate training centre, equipped with multiple classrooms and high-tech rooms, employees have access to the Corporate University’s Online Campus which includes the latest advances in e-learning methodologies.

LANGUAGE SCHOOL

Open to 100% of employees, this platform offers studies in up to six different languages. The teaching model is complemented with new digital itineraries and specific webinars.

2020 INVESTMENT IN TRAINING

Average expenditure on training and development (euros)	617
Average hours per FTE of training and development	35,60

SKILLS DEVELOPMENT CENTRE

The Skills Development Centre provides the workforce with the so-called Professional Skills Courses, designed to promote skills related to the position of each person in the company. These courses have expert videos and learning modules available on the Online Campus. A battery of more than 50 courses was launched, and more than 1,200 employees from ACCIONA have participated.

PEOPLE CENTRIC

LEADERSHIP

ACCIONA Energía promotes leadership models in which every employee can take responsibility and share the company’s purpose so that the whole organisation is aligned to meet the objectives

MANAGING KNOWLEDGE

T-MAX+ 2020 Programme

The T-MAX+ skills training programme is intended specifically for ACCIONA's technical staff. Its aim is to consolidate the functions of this group and their training needs. This is the first ACCIONA Corporate University training course that offsets the emissions it emits.

BUSINESS SCHOOL

The business school programmes have moved to a 100% online format:

- M3+ Programme - created for ACCIONA managers, this year a total of 643 employees have participated, receiving 1,900 hours of training. This year’s programme went into greater depth in the area of people management and economic management.
- Executive MBA - the 10th edition of this course was attended by 35 ACCIONA professionals from different countries around the world. It is organised in collaboration with the EOI.

TECHNICAL SKILLS

These training spaces were designed to improve productivity, technical excellence and the specialisation and internationalisation of ACCIONA professionals, guaranteeing a high level of qualification. Each itinerary contains specialities and sub-specialities. The training activities are planned as a structured educational sequence.

- IMPA, International Master in Project Administration - this is a global Master’s Degree offered in collaboration with the Polytechnic University of Madrid (UPM).

ACCIONA ENERGÍA NEW HIRES

2019			2020		
Men	Women	Total	Men	Women	Total
251	96	347	152	53	205

In 2020, training initiatives in equality, diversity and inclusion, non-discrimination and multiculturality have been developed through a variety of training programmes such as the Global Gender Equality Programme for all employees and other specific programmes intended for technicians and managers.

PEOPLE CENTRIC

DIVERSITY AND INCLUSION

Both diversity and inclusion form part of our values. ACCIONA Energía is firmly committed to effective equal opportunities. This commitment promotes diversity as a key competitive advantage for our businesses and priority strategy for people management.

DIVERSITY

The structure driving the policies and programmes is formed of the Diversity Management Area on a global scale, and the Diversity and Inclusion Committees in all the strategic businesses and countries including ACCIONA Energía. The committees are formed by groups of employees representing all the collectives that form part of the company. Their mission is to create a network of ambassadors, collect the information from their environment and generate specific diversity and inclusion proposals and initiatives.

GENDER DIVERSITY

In order to promote effective equal treatment and opportunities for men and women, ACCIONA Energía has continued to work in two fundamental areas:

- Ongoing review of the Human Resources processes to promote the attraction, retention and promotion of talent in the different stages of women’s professional careers.
- Promotion of an inclusive culture with behaviours contributing to the removal of barriers impeding equal opportunities in the workplace.

At the close of 2020, the overall workforce was 1,543 people, with 27% women.

New programmes to promote gender diversity

- Global mentoring programme for women in pre-executive positions (35 women).
- Global acceleration programme for women with potential, (67 women).
- Management Development Programme for Women with High Potential (21 women).
- Programme for Women to Rejoin the labour market after the pandemic.

Implemented globally in ACCIONA.

In terms of hiring, the hiring of women has been promoted, or there is a guarantee that at least one woman’s CV will be included in all the processes. These actions are aligned with the set objectives, to increase the number of women in management and executive positions, achieve equal pay and promote women’s leadership programmes.

WORKFORCE DISTRIBUTION BY GENDER, TYPE OF CONTRACT AND AGE

2019						2020					
Temporary			Permanent			Temporary			Permanent		
Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
42	13	55	1,150	424	1,574	49	16	66	1,072	405	1,477
2020											
Full time						Part time					
Men	Women	Total	Men	Women	Total	Men	Women	Total	By age		
1,120	411	1,531	1	11	12	<30			<30	30-50	>50
									12%	73%	15%

PEOPLE CENTRIC

DIVERSITY AND INCLUSION

Both diversity and inclusion form part of our values. ACCIONA Energía is firmly committed to effective equal opportunities. This commitment promotes diversity as a key competitive advantage for our businesses and priority strategy for people management.

INCLUSION

ACCIONA's Code of Conduct promotes equal opportunities effective beyond gender diversity and under no circumstances accepts any form of discrimination in the workplace on grounds of age, race, gender, religion, political opinion, nationality, sexual orientation, social background or disability.

INCLUSION OF PEOPLE WITH DISABILITIES AND VULNERABLE GROUPS

The average number of employees with a 33% level or more of disabilities at ACCIONA was 995 workers in Spain 3 as a group level (direct and indirect employment). This represents 3.97% of the total workforce, the same figure as the previous year. Direct employment accounted for 3.46%. The remainder comes from purchases from Special Job Centres and donations to third sector organisations.

Other noteworthy initiatives by ACCIONA in 2020 in the area of inclusion in the workplace of people with disabilities and other vulnerable groups include:

- 161 people hired through the Fundación Integra, with which the group collaborates nationwide on the insertion of people with disabilities, the long-term unemployed and victims of gender violence in the workplace.
- 478 people hired through the Fundación Inserta , with which the group collaborates nationwide on the placement of people with disabilities in the workplace.

In 2020 objectives were set to promote socially responsible hiring in four key countries: Australia, Canada, Chile and Mexico. At least 1% of the workforce must be made up of workers with disability and, in any event, a percentage that exceeds the legal minimum.

ACCIONA Energía is aware of the role it plays in the communities in which it operates. In accordance with its code of conduct and its policies, it respects the rights of the local communities and the people living and working in them in accordance with international human rights rules, and makes an effort to create positive impacts that improve the life of people in the communities.

In this regard, it encourages local hiring and protects minorities (BBEEE requirements in South Africa, First Nations in Canada, indigenous people in Australia, immigrant groups in the Midde East and Asia, and other communities). To do so, it develops specific plans in its projects that include training, awareness-raising, elimination of barriers, employment hiring and collaboration with bodies and institutions.

PEOPLE CENTRIC

RECOGNITION

ACCIONA Energía’s people management model is supplemented by policies and initiatives designed to optimise employee performance, enhance their professional development and manage objective-based compensation.

DEVELOPMENT AND PROMOTION OF TALENT

The Performance Management Model is based on three pillars: Setting Objectives, My Development and Performance Status. The purpose is to identify, develop and recognise the talent of ACCIONA Energía’s professionals.

In 2020, special emphasis was placed on identifying performance and potential, the so-called Performance Status. In its third year, this process was consolidated as a global tool for evaluating performance and potential at ACCIONA Energía, as a way of providing a comprehensive view of internal talent and enabling decisions to be made and action plans to be designed on the basis of the needs detected.

INTERNAL MOBILITY

Another of the key levers in workforce management is professional growth through promotion within ACCIONA Energía. Improved access to the opportunities offered by the company, as well as the possibility of subscribing to newsletters, encourages the employees themselves to be responsible for their professional growth.

COMPENSATION POLICY

ACCIONA rewards its employees according to the following criteria: sectoral and geographical competitiveness, internal equity and merit. This means that remuneration of employees is defined according to results and a position classification system that organises objectively each worker’s contribution to the company. In addition, there is no gender-based differentiation and any decision on individual payment review is approached objectively, ensuring that the compensation is fair according to the level of responsibility and the contribution to the company’s objectives.

VARIABLE REMUNERATION PLAN: BONUS

The program for employees with variable remuneration, in place since 2012, considers criteria related to both the company's financial results and the fulfilment of individual goals, and is based on objective and pre-established metrics. In accordance with the objectives set out in the Sustainability Master Plan (SMP), ACCIONA Bonus is being extended internationally to all divisions in key countries.

STANDARDIZED STRUCTURE OF OBJECTIVES THAT MAKE UP THE BONUS

ACCIONA’s overall results	Specific targets	Individual goals	Criteria linked to sustainability
Represent 10% for all employees and 15% for directors.	Relative to the division, country or business unit with its own income statement.	The basis is the individual assessment of performance.	They represent around 5% of the targets. This has increased from 3.5% in 2019 and the aim is to continue increasing its weight.

PEOPLE CENTRIC

RECOGNITION

ACCIONA Energía’s people management model is supplemented by policies and initiatives designed to optimise employee performance, enhance their professional development and manage objective-based compensation.

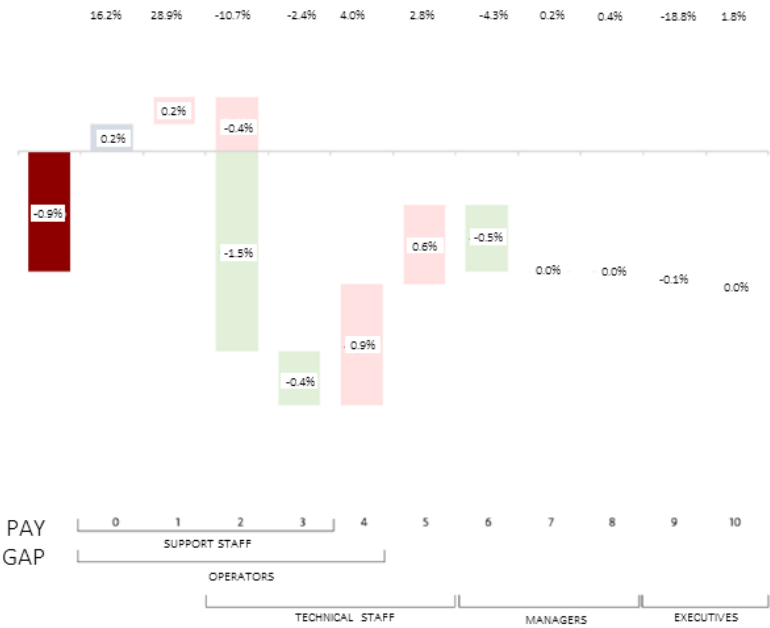
DEVELOPMENT AND PROMOTION OF TALENT

GENDER PAY GAP

ACCIONA Energía is determined to ensure that there is no gender-based inequality in its activities, to achieve equal pay between genders in all the businesses and countries where it operates. To this end, the company has developed a salary analysis methodology based on best international practices, validated by an independent external party.

With this information, the data is studied annually for each business line and level of responsibility to define whether there is unequal pay for equal work and why. The aim is to eliminate this type of inequality. This action plan is periodically monitored by management, which assesses the progress being made at each level of the organisation.

ACCIONA Energía gender pay gap analysis



In 2020, ACCIONA Energía found an average gender pay gap between men and women of -0.9% and a median pay gap between men and women of -2.9%.

PEOPLE CENTRIC

ENVIRONMENT

The health and safety strategy is based on excellence (zero accident target), continuous improvement and employee support.

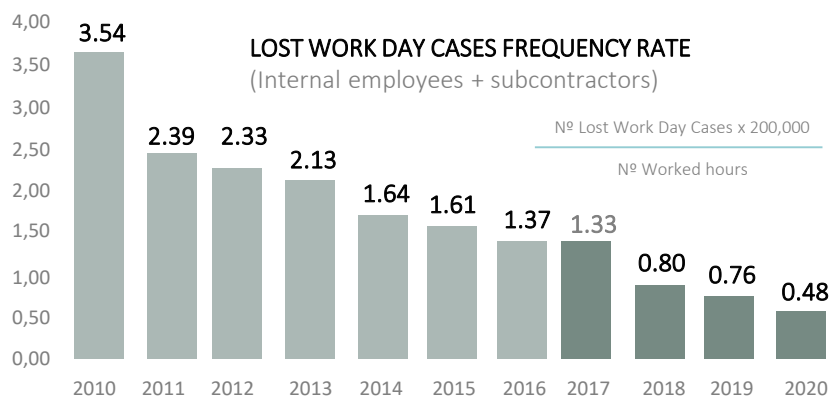
HEALTH & SAFETY

ACCIONA Energía has an Integrated Management System for the entire business which establishes the minimum health and safety requirements that should be taken into account in any of its companies and countries. Under the multi-site certification format, in 2020 it maintained the certification in all of its companies in accordance with the ISO45001 standard. The possible Energy risks involving health and safety at work arise from two of its main activities: construction and operation and maintenance of facilities.

	2019	2020
ISO45001 Certification	100 %	100 %

ACCIONA Energía chairs the Global Wind Organisation (GWO) for the promotion of occupational health and safety standards in the wind energy sector worldwide.

In 2020, no cases of occupational disease were detected in the division and there were no fatal accidents. In addition, the hygiene risk is minimal or zero. The frequency rate and the severity index went down by 97% and 75%, respectively, compared to the previous year.



*ACCIONA Energía 2020 rate was not consequence of the pandemic (as we have worked the same). It has been consequence of our continuous improvement safety programs.

IDENTIFICATION AND MANAGEMENT OF OCCUPATIONAL RISK

The identification of any possible labour-related risks, their assessment and control measures for minimising the probability of them occurring is documented in specific procedures for each facility. In addition, the facilities have their own emergency plans with guidelines on how to proceed in emergency situations. ACCIONA Energía makes and publishes safety alerts on its web site involving any incidents from which lessons have been learned that could be of interest to the sector (<https://www.accionacom/our-purpose/work-with-us/safety-health-well-being/>).

Trainings and awareness-raising programmes and requirements in occupational risk prevention:

	2020
Energy	20,656

PEOPLE CENTRIC

ENVIRONMENT

The health and safety strategy is based on excellence (zero accident target), continuous improvement and employee support.

Among the health and safety objectives defined by energy for the year 2020, the following deserve special mention:

- A 5% reduction in the accident frequency rate involving its own employees and subcontracted employees being off work, compared to the 2020 figure.
- To implement the actions defined in the safety improvement programme, Drive Safe, in at least three countries in ACCIONA's Energy Division: Chile, Mexico and Spain.
- To implement the priority scheduled actions for the first year resulting from the ergonomic analysis made in 2020 in the activities of wind farms and hydraulic plants.
- To extend the philosophy defined and introduced for the Integrated Management of Engineering and Construction Contractors to the Operation and Maintenance activities.

MAIN PROGRAMMES

Act Safe and Build Safe Projects - Alongside DUPONT, a diagnosis was made regarding the situation of the O&M and I&C services within the Bradley Preventive Culture curve. From there, it was possible to identify where the company is and where it wants to be in two years' time. A action plan was defined aiming at attaining health and safety excellence for all activities in ACCIONA Energía.

Drive Safe Programme - This programme comprises a comprehensive view of road safety as it takes into account both our own employees and those of our new subcontractors, and in addition it covers the risk factors associated with driving skills, environmental conditions and the technical requirements that our vehicles have to meet.

HEALTHY AND SAFETY IN THE ENERGY SUPPLY CHAIN

Energy's occupational safety policy establishes that the requirements for preventing risks are the same for its own employees as for its subcontractors. At the time of contracting, all suppliers must undergo an assessment of their performance in this area. Energy has measures in place that cover all phases of the process, from tendering to completion:

- Limiting the frequency rates of suppliers and contractors in tenders.
- Personalization of tasks and periodic compliance assessments.
- Warning letters and fines for reiterated misconduct.
- Final occupational health assessment by the manager and the procurement area with a view to future tenders.

In addition, the division periodically organises "meeting points" with suppliers to share experiences and agree on health and safety actions to be taken.

PEOPLE CENTRIC

ACCESS

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 employees, suppliers, contractors, collaborators, partners, competitors, customers, local communities, and society in general.

HUMAN RIGHTS

Among the basic behavioural guidelines to which ACCIONA Energía adheres are the Universal Declaration of Human Rights and the corresponding international Agreements adopted by the United Nations General Assembly, and the Declaration of Fundamental Principles and Rights at Work and ILO Conventions; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the OECD Guidelines for Multinational Enterprises; the United Nations Convention on the Rights of the Child; the United Nations Global Compact and the Seoul Declaration on Health and Safety at Work.

In 2020, the company updated its Human Rights Policy, which will be approved in 2021, to adapt it as far as possible to the terms of the UN Guiding Principles on Business and Human Rights. This readjustment sees ACCIONA Energía assuming responsibility for avoiding the possible negative effects of its activities and taking the measures necessary to prevent, mitigate and, where relevant, remedy them.

A system of human rights monitoring has been designed for all the businesses in the group and all the countries where ACCIONA Energía does business

The controls arise from the need to mitigate the possible social risks identified that derive from the company's activity and its relations with stakeholders, some of them include:

- Participating or being complicit, both directly and indirectly, in harassment, discrimination, abuse, severe, degrading or inhuman treatment (such as detentions, arrests, torture, etc.).
- Violating or being complicit in violating, directly or indirectly, the right to freedom of thought, conscience, religion and opinion.
- Incurring directly or indirectly in the promotion or use of forced labour or modern slavery for the performance of projects, and/or people trafficking.
- Incurring directly or indirectly in the promotion of child labour practices.
- Participating or being complicit, both directly and indirectly, in violating the right to association and collective bargaining.
- Participating in or benefiting directly or indirectly from unfair, illegal and/or unethical hiring conditions.
- Undermining fundamental rights to obtain direct or indirect benefit.
- Harming, directly or indirectly, the rights of communities and minorities.

PEOPLE CENTRIC

ACCESS

HUMAN RIGHTS

ACCIONA Energía understands the concept of Human Rights Due Diligence (HRDD) as an ongoing process to identify, prevent, mitigate, remedy and inform about the negative consequences, either real or potential, of its activities on Human Rights, in accordance with the United Nations Guiding Principles on Business and Human Rights and as provided for in the OECD Guidelines for Multinational Enterprises. In 2020 a process has been designed in which due diligence in human rights begins during the identification stage of a business opportunity. Before presenting a bid, ACCIONA determines the most notable inherent risks according to the country and the sector in question, so that they can be prevented and managed.

Since the company joined the Executive Committee of Building Responsibly, ten guides have been approved that include references for the practical application of the principles of workers’ well-being throughout the value chain.

HUMAN RIGHTS IN THE COMMUNITIES

Using its Social Impact Management (SIM) methodology, ACCIONA Energía analyses any possible violations of human rights that may arise among local communities and other stakeholders in connection with a particular project or service. In those cases in which possible infringements of human rights are identified, the SIM methodology requires that prevention and mitigation measures be established.

HUMAN RIGHTS IN THE SUPPLY CHAIN

Through the supplier portal and the group's tendering tool, ACCIONA Energía establishes different mechanisms that help prevent the violation of Human Rights throughout its supply chain: Self-Declaration of Responsibility for Suppliers, Ethical Principles for Suppliers, Contractors and Collaborators, Risk Maps, Supplier Evaluation and Approval Procedures, general contracting clauses, supplier audits and No Go Policies.

Suppliers or contractors that violated or endangered Human Rights compliance	Not identified
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HUMAN RIGHTS TRAINING

In 2020, a specific Human Rights training course run in collaboration with the Spanish Global Compact Network, and available to both employees and the company's suppliers, was launched.

WORKERS COVERAGE

At ACCIONA, practically all groups of employees are covered by collective bargaining agreements in the different countries where they operate. In certain countries, and for implementation or legislative framework reasons, there may be small groups of workers that are not covered, although these would in any case represent less than 1% of the total workforce..

S U S T A I N A B I L I T Y
P E R F O R M A N C E
P L A N E T P O S I T I V E

PLANET POSITIVE

CLIMATE

Unwavering commitment to production solely from renewable sources, contributing to replacing fossil fuels in the national electricity mixes.

In the framework of the Sustainability Master Plan 2020, this business committed to investing \$ 2.500 million in the 2016-2020 period in renewable generation, reaching a total capacity of 10,500 MW. In 2020 the target has been achieved and the emission of a total of 13.2 million tonnes of CO₂ into the atmosphere has been avoided. For the 2020-2024 period, the company has set itself the new challenge of increasing its installed capacity by nearly 50 %, adding 5,000 renewable MW to its current figures.

As a result of technical and economic competitiveness, the investment in renewable energies contributes to reducing the GHG emissions that cause climate change. Nowadays it is seen as the best sustainable energy solution in the long term.

COUNTRIES	INSTALLED CAPACITY (MW)	PRODUCTION (GWH)	EMISSIONS AVOIDED (TCO ₂ E)
Australia	453	1,239	978,880
Canada	181	503	358,690
Chile	713	1,461	1,072,312
Costa Rica	50	227	154,147
Croatia	30	71	36,779
United States	1,128	2,311	1,402,163
Egypt	186	432	228,369
Spain	5,677	12,486	5,446,283
Hungary	24	42	24,507
India	164	367	349,792
Italy	156	231	104,968
Mexico	1,335	3,528	2,022,024
Poland	101	230	183,581
Portugal	165	351	244,473
South Africa	232	530	524,421
Ukraine	100	67	66,830
TOTAL	10,694	24,075	13,198,219

PLANET POSITIVE

CLIMATE

Unwavering commitment to production solely from renewable sources, contributing to replacing fossil fuels in the national electricity mixes.

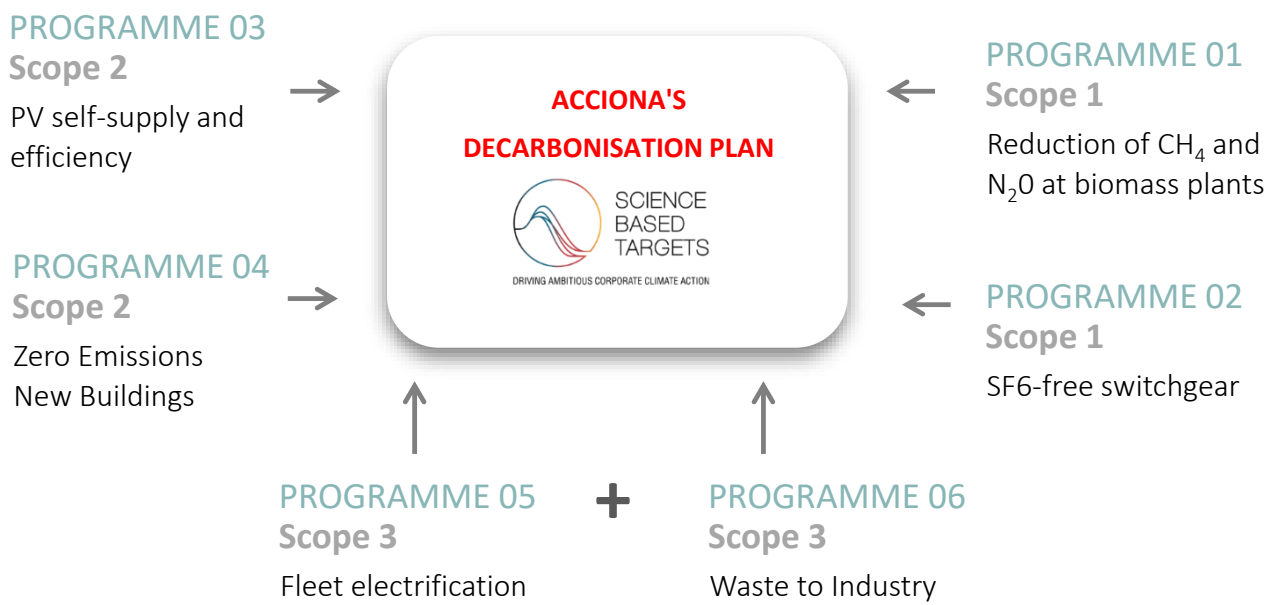
DECARBONISATION PLAN

ACCIONA fully shares the objectives of total decarbonisation of the economy through public commitments, policies, specific procedures and objectives, and an economic incentive model linked to achieving GHG emission reductions for directors, managers, technical and support staff. ACCIONA Energía has developed its Decarbonisation Plan to achieve its objectives.

ACCIONA ENERGÍA'S DECARBONISATION PLAN

The plan aims to reduce emissions by 60% by:

- Purchase of renewable electricity at all our assets.
- 4 decarbonisation programmes for Scope 1 and 2 emissions.
- 2 additional programmes for Scope 3 footprint reduction.



PLANET POSITIVE

CLIMATE

. Unwavering commitment to production solely from renewable sources, contributing to replacing fossil fuels in the national electricity mixes.

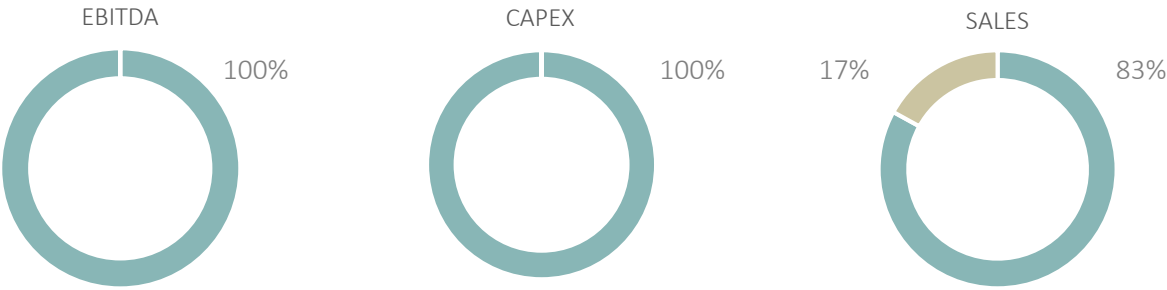
TAXONOMY

EUROPEAN TAXONOMY OF ENVIRONMENTALLY SUSTAINABLE ECONOMIC ACTIVITIES

The active involvement of financial markets in financing the sustainable economy is indispensable for the European Union’s plans to move towards a low-carbon economy. The EU taxonomy Regulation, which came into force on 12 July 2020, will help to create the world’s first 'green list', a classification system for sustainable economic activities, which 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.

The development of the technical criteria for selection of activities within the taxonomy is at different stages of progress, and is most advanced in the targets for mitigation and adaptation to climate change. In these two areas, the Commission presented a draft delegated act at the end of 2020, (based on the recommendations of the Technical Group of Experts in Sustainable Finances published in March 2020 and previously in June 2019), which will become effective on 1 January 2022. For an activity to be classified as taxonomic, apart from meeting the technical selection criteria, it must also satisfy a minimum of social safeguards and must not contradict any of the other four objectives sought by the regulation: water protection, transition to a circular economy, control of pollution and healthy ecosystems.

Again in 2020, ACCIONA Energía carried out a classification of its activities using the criteria in the most recent version of the European taxonomy (draft Delegated Act at the end of 2020), so that 100% of CAPEX, 100% of EBITDA and 83% of the company’s sales meet the requirements established in relation to the mitigation of climate change.



■ Activity in line with the taxonomy ■ Activity not in line with the taxonomy

PLANET POSITIVE

BIODIVERSITY

ACCIONA views biodiversity conservation and the responsible use of natural heritage not only as an ethical commitment but also a necessary condition for global sustainability.

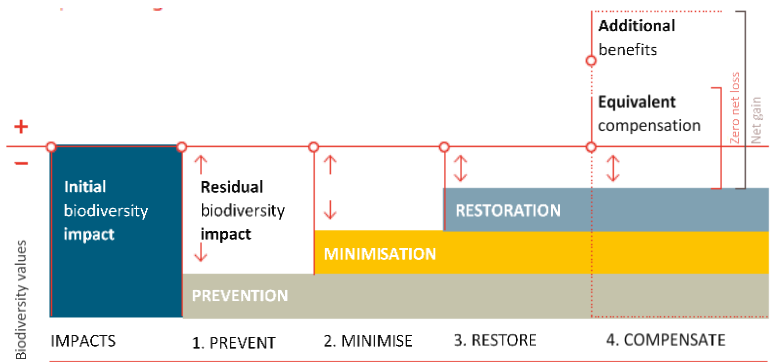
ACCIONA applies a specific Corporate Biodiversity Policy which uses a variety of principles to promote the appreciation for and conservation of animal and plant species as a necessity for economic development and social progress.



In its new 2025 Sustainability Master Plan, we have included a strategic line on biodiversity, with the aim of both applying the hierarchy of mitigation of impacts in all its projects and setting targets that can deliver a positive material result for the environment and biodiversity through natural science-based solutions.

HIERARCHY OF MITIGATION IN BIODIVERSITY

ACCIONA accords priority to the hierarchy strategy of mitigating impacts on biodiversity. As part of its strategy on mitigation hierarchy, the company has a programme for Biodiversity Enhancement and Compensation.



Source: modified from UICN 2015.

BIODIVERSITY FOOTPRINT

Within the framework of the 2016-2020 Sustainability Master Plan, ACCIONA Energía set itself the goal of developing a methodology allowing it to measure its biodiversity footprint and achieve neutrality. The methodology focuses on material aspects and integrates two internationally recognized tools

ACCIONA Energía has developed specific biodiversity scorecards based on a digital repository of public biodiversity information and internal data, interconnected by cartographic representations and data analysis applications. These scorecards enable each operating centre to have updated data analyses of the principal biodiversity KPIs, and their referenced geographical position according to maps of protected areas.

IDENTIFICATION AND ASSESSMENT OF THE MOST SIGNIFICANT IMPACTS

ACCIONA Energía identifies and assesses the most significant impacts of its facilities located in protected and non-protected areas that are of great value for biodiversity.

PLANET POSITIVE

BIODIVERSITY

ACCIONA Energía views biodiversity conservation and the responsible use of natural heritage not only as an ethical commitment but also a necessary condition for global sustainability.

BIODIVERSITY METRICS

How many sites are used for production activities?	259 sites	8,316 ha
How many sites have been assessed and mapped for biodiversity?	100%	100%
How many contain or are adjacent to globally or nationally important biodiversity?	175 sites	2,333 ha
How many sites have biodiversity management plans?	100%	100%

BIODIVERSITY PROJECTS

The energy division makes every effort to protect and conserve biological diversity. It has initiatives for the conservation of fauna and flora in its facilities, highlighting the following actions carried out in 2020:

REDUCING VISUAL IMPACT AND IMPROVING EFFICIENCY OF WIND POWER

Lower impact and improved efficiency by replacing 90 old wind turbines (1995) with 12 modern ones. Increasing the output by 16% due to the more efficient wind turbine technology and the highest availability of the turbines. More than 107,000 tonnes of CO2 avoided annually in coal-fired power stations.

INSTALLATION OF BIRD DETECTORS ON WIND TURBINES

An R&D project was commenced, focusing on analyzing and experimenting with technologies aimed at reducing incidents involving birds and wind turbines. These are systems that use high resolution cameras and artificial intelligence for detecting birds in the area of the wind farms and which emit signals in circumstances considered a risk of collision.

SALMON HABITAT RECOVERY PLAN

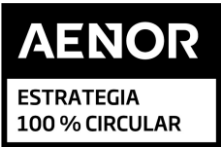
Recovery of salmon habitat in the Nansa River, which has been disturbed since the river's energy was harnessed in 1955 . The project consists of a celis weir and vendul weir fish ladders. It allows an upstream access for almos and a downstream access for smolts.

PROTECTED SPECIES

The company identifies the species affected by its facilities that are included on the Red List of Endangered Species prepared by the International Union for Conservation of Nature (IUCN) or included in national conservation catalogues. ACCIONA Energía’s projects consider the protection and restoration of those areas that could be affected by its facilities.

PLANET POSITIVE

CIRCULARITY



ACCIONA is a pioneer in the transition to a circular economy. In fact, it was the first company in its sectors of activity to be awarded the AENOR circular business strategy certification.

ACCIONA Energía clearly identifies with the circular economy model in such a way that the generation of renewable energy has for some years now been linked to measures such as the recovery of most of the related waste. It mainly involves slag and ash generated by its biomass plants, which are put to agricultural use. They are used for recovering degraded areas or as an ingredient for producing clinker (the main component of cement), low in carbon.

WASTE GENERATION AND MANAGEMENT (TONNES)

	2017	2018	2019	2020
Non hazardous waste	34,334.00	36,044.00	31,643.00	34,408.00
Hazardous waste	3,001.00	7,115.00	834.65	746.00
Recycled waste	30,088.40	24,700.45	25,268.96	32,788.86
TOTAL WASTE	37,335.00	43,159.00	32,477.65	35,154.00
TOTAL WASTE DISPOSED	7,246.60	18,458.55	7,208.69	2,365.14

Looking to the new period 2021-2025, ACCIONA has resolved to increase its efforts in the area of the circular economy, and plans to halve the amount of non-recovered waste generated in 2020, and double the percentage of renewable/recycled resources used.

Challenges in waste management during the construction of the DEWA III photovoltaic plant

ACCIONA Energía participates in the construction of the largest photovoltaic plant in the world in the United Arab Emirates, that will have 800 MW of nominal power. The size of the project has been a challenge in respect of the separation and recovery of the waste generated by the packaging for the almost 100,000 photovoltaic modules received. After a complicated beginning, the project managed to improve its recovery statistics up to almost 74 % for plastics, 81 % for wood waste and 99 % for paper and cardboard waste. It also managed to reduce the management expense to almost half as a result of less need for transportation and the revenue generated by the sale of waste to local recovery companies.

PLANET POSITIVE

CIRCULARITY

OPERATIONS AND MAINTENANCE (O&M) OF RENEWABLE ASSETS

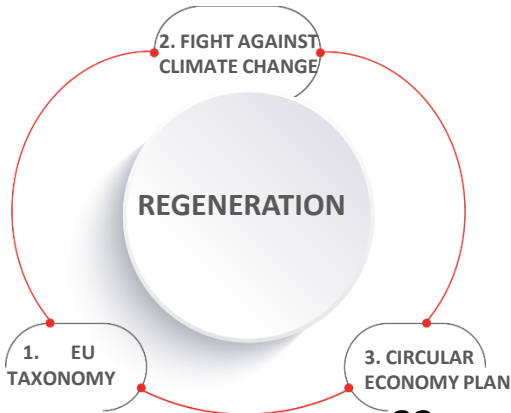
The company manages the extension of the useful life of renewable facilities through predictive maintenance programmes based on the smart management of big data and of artificial intelligence and machine learning technologies. ACCIONA develops solutions for the operation and maintenance of clean energy assets with a focus on prevention, safety and innovation. Through this, it optimizes its own energy generation and that of its clients, improving processes at each step and working every day to be more efficient.

- **TAKING CARE OF WIND FARMS-** We can ensure the longest useful life of wind power facilities thanks to our experience and innovative capacities. We work with technologies such as Gamesa, Vestas, AWP and GE.
- **TAKING CARE OF PHOTOVOLTAIC FARMS-** We operate and maintain solar farms composed of both fixed and mobile panels, as well as other related electric infrastructures.
- **CONSERVING HIGH VOLTAGE-** We maintain 85 substations, more than 3,000 transformer centres and underground and overhead lines, and offer engineering and substation commissioning services, minimising response times and always complying with safety regulations.

Projects	Target	Technology
Physical models	Estimations of remaining useful life	Long term: Physical simulation models (material science)
SolarBrain®	Identify operations out of expected and optimize production in PV plants	Big Data, Machine Learning and Artificial Intelligence
WindBrain®	Detect anomalies in operation, prediction of remaining useful life, behavior analysis, with the goal of predictive maintenance	Big Data, Machine Learning and Artificial Intelligence

REGENERATIVE INFRASTRUCTURES

ACCIONA uses Life Cycle Analysis methodology for all new renewable projects. This process shows, for example, that the emissions caused by the construction of a wind farm are compensated during its first 9-10 months of operation, and from then on, the facility becomes a positive carbon emitter until the end of its useful life, 25 or 30 years later. The use of these tools also shows the relevance of the sustainable management of replacement parts during the life cycle of the wind farms. The application of the circular economy, with priority for repair over replacement, enables ACCIONA to avoid the emission of more than 6,000 tonnes of CO₂ by extending the useful life of multipliers (>3,500 tCO₂) and generators (2,500 tCO₂).



PLANET POSITIVE

WATER

ACCIONA Energía has a specific water policy which main objective of which is to support the fundamental human right of access to drinking water and sanitation.

The water agenda is determined by 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 risk management, the extension of its principles to the value chain and transparent communication.

USE OF WATER (MILLION m³)				
	2017	2018	2019	2020
TOTAL NET WATER CONSUMPTION	3,55	0,96	1,01	0,88
Withdrawal: total municipal water supplies	0,55	0,51	0,52	0,40
Withdrawal: fresh surface water	27,32	24,10	21,49	23,78
TOTAL WATER WITHDRAWAL	27,86	24,62	22,02	24,19
TOTAL WATER DISCHARGE	24,31	23,66	21,01	23,31

The company and bodies responsible for the environment implement prevention measures to minimize possible impacts on species that might be found in river ecosystems and other bodies of water, as well as rules for respecting the environmental flow system and the technical requirements set by the Administration itself. The processes that guarantee compliance with the requirements for water collection and discharge are part of the environmental management systems implemented, verified and certified by the company according to the ISO 14001 international standard.

- There are three different ways in which ACCIONA uses water in its operations:
- Water for internal consumption: This is water used by the company at its own facilities. This use includes freshwater obtained from the municipality, as well as surface and groundwater.
 - This refers to the residual water from ACCIONA’s internal consumption that has not evaporated or been used in any company asset and that is removed from the facilities as specified in the relevant discharge permits. All wastewater discharged by ACCIONA complies with the specifications in the relevant discharge permits.
 - This refers to water that enters and leaves ACCIONA’s 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.

S U S T A I N A B I L I T Y
P E R F O R M A N C E
E X P O N E N T I A L
L E A D E R S H I P

EXPONENTIAL LEADERSHIP

AUTHENTICITY

LONG TERM AGREEMENTS

ACCIONA Energía was the 4th developer with the highest number of PPAs signed in the world

In 2020, ACCIONA Energía continued to reinforce its strategy of selling renewable energy to large corporate customers who wish to reduce their carbon footprint with new agreements for long-term renewable supply, known as Power Purchase Agreements (PPAs).

CUSTOMER RELATIONS AT THEIR DISPOSALS

Green Energy Developments manages the sale of 100% of the renewable energy produced at the group's facilities to the electricity market. It also handles the sale of renewable energy of other independent producers, who benefit from the group's technical capacity and experience, adapted to customer needs. It also sells 100 % renewable energy certified by the National Commission on Markets and Competition (CNMC) to customers, who it advises on the most suitable contract for optimizing their consumption. The company has a CRM system that manages the relationship with the customer, contributes to the provision of the service and effective follow-up.

EVOLUTION OF CUSTOMER SATISFACTION

	2017	2018	2019	2020
Satisfied customers	100 %	100 %	98 %	99 %

NON CONFORMITIES

The philosophy of the non-conformity report, and also the correct attribution of non-conformity costs, is essential for carrying out a thorough analysis of the lines of action regarding the most critical processes, supplies and/or suppliers.

Reduction of KPI (Costs of Non-conformity / CAPEX of the projects monitored), obtaining a 43% improvement on the previous year, from 0.82 (2019) to 0.47 (2020).

PRODUCT SECURITY AND QUALITY

The Control Centre of Renewable Energy (CECOER), has adapted its processes to comply with CIP regulations (Cybersecurity in the Energy Sector) in USA and Canada. A new infrastructure has been created in the Chicago control centre, monitoring users and access. Furthermore, a new app has begun to be used for improving security in the management of electrical discharges in substations.

EXPONENTIAL LEADERSHIP

SUSTAINABLE TRANSFORMATIONAL INNOVATION

Innovation is a founding pillar for staying in the forefront in a sector that is increasingly more competitive.

INNOVATION

ACCIONA Energía is committed to innovation in all areas to continuously anticipate future market trends and disruptions, as well as to pursue solutions that can generate new business opportunities in line with commercial objectives. Therefore, one more year the company has continued to promote R&D&I and encourage open innovation.

The figure recorded for innovation in renewables in 2020 was € 78.4 million.

EVOLUTION OF FIGURE FOR R+D+I

	2017	2018	2019	2020
Figure R&D&i (M€)	66.4	61.8	75.4	78.3

Energy technology management

The Energy Technology Department is located in Madrid and is the core of ACCIONA Energía’s renewable energy innovation activity, where most of the strategic lines of research are carried out: wind, solar, electricity storage and new energy solutions. The energy innovation team is distributed among the energy centres in Pamplona, Madrid and Mexico. ACCIONA Energía tests, characterises and integrates the best technologies available on the market and collaborates with various manufacturers on new products to improve the cost and reliability of the energy generated.

ON-SHORE WIND AREA

- Implantation of innovative control strategies that maximise the power curve in the AW3000 fleet.
- Study, implementation and validation of noise reduction in wind turbines with different brands of blade.
- Use of 3D printing to manufacture spare parts, avoiding international logistics

PHOTOVOLTAIC SOLAR AREA

Conclusion of construction of the first floating PV plant connected to the Spanish electricity grid in the Sierra Brava reservoir (Cáceres) with 1.125 MW of power.

EXPONENTIAL LEADERSHIP

SUSTAINABLE TRANSFORMATIONAL INNOVATION

Innovation is a founding pillar for staying in the forefront in a sector that is increasingly more competitive.

RENEWABLE ENERGY CONTROL CENTER

ACCIONA’s Renewable Energy Control Center (CECOER) carries out real-time monitoring of the group’s renewables facilities, which total around 15,000 MW.

CECOER manages data from more than 400 wind farms and hydropower, photovoltaic and CSP plants owned by the ACCIONA Group or other companies in 24 countries on the five continents. As well as power generation plants, it also supervises the operation of 300 transformer substations.

The CECOER is one of the biggest renewable energy control centers in the world. It covers the main functions related to the operation and maintenance of our assets, as well as communication with the electric power systems of the markets where we operate.





These are its main functions:

- 1. Supervision and control
- 2. Dealing with incidents
- 3. Electric power management
- 4. Interaction with the System Operator
- 5. Recording data, analysis, etc.
- 6. Compliance
- 7. Monitoring and control

CECOER IN FIGURES

15 GW Capacity Managed
24 Countries
32+ TWh Capacity managed/ year
60% Remote solution of incidents (avoiding **>250k** local operations)
8,300+ Wind turbines Monitored
24/365 Non-stop Supervision
97% availability rate



	Specific in-house programs to extend the life of the assets beyond 40 years
	Advanced storage solutions (grid integration)
	Digitalization and Artificial Intelligence
	Self-regulated assets through automation & robotics

EXPONENTIAL LEADERSHIP

SUSTAINABLE TRANSFORMATIONAL INNOVATION

Innovation is a founding pillar for staying in the forefront in a sector that is increasingly more competitive.

NEW SOLUTIONS: HYDROGEN

Power to Green Hydrogen Mallorca (Spain)

In line with the new EU Hydrogen Strategy, the first green hydrogen industrial plant in Mallorca will also become the first strategic reference (flagship) for Southern Europe, with the creation of a “green hydrogen ecosystem” in the Balearic Islands.

Renewable hydrogen will be used to supply clean energy to various sectors of the island:

- Fuel supply to fleets of buses and fuel cell rental vehicles
- Heat and Power Generation for Commercial and Public Buildings
- Auxiliary power supply to ferries and port operations

Key figures



2,5 MW Electrolizador

H₂

300 ton Green H2 produced per year



10 M€ Green Hysland European Grant Project



13,4 MW PV power generación



20,700 ton CO2 emissions per year avoided



2021 Operation start, end 2021

ACCIONA and Plug Power to partner on establishing leading green hydrogen platform for the Iberian Peninsula.

The joint-venture will be a leading green hydrogen platform and aims for a 20% market share in Spain and Portugal by 2030, which will entail an initially planned investment of over €2 billion.

The parties expect the JV will develop, operate, and maintain green hydrogen projects, serving the growing demand in the Iberian Peninsula. The new company also plans to provide storage, transportation, and delivery services to its customers, initially targeting the industrial and the mobility business segments.

The joint venture company is subject to definitive documentation and is expected to be launched by the end of the first half of 2021. The initial projects to be selected are already under development.

GreenH2Chain: Acciona Green H2 guarantees of origin

ACCIONA has developed GreenH2chain®, the world's first platform based on blockchain technology that guarantees the renewable origin of green hydrogen. This new tool will also allow clients to verify the transportation and delivery process of this type of clean energy.

The platform will be implemented in the Power to Green Hydrogen project, designed to create a green ecosystem on the island of Mallorca (Spain). ACCIONA will also use GreenH2chain® in all future renewable hydrogen generation projects.

EXPONENTIAL LEADERSHIP


GOVERNANCE

One of ACCIONA Energía’s commitments in the area of corporate governance is to strive for continuous improvement and greater transparency, efficiency and rigour in the operation of its governing bodies. This factor is decisive for the generation of trust and long-term commitment between ACCIONA Energía and its stakeholders.

The organisation is governed by the recommendations set out in the Code of Good Governance for Listed Companies of the Spanish National Securities Market Commission (CNMV), as well as domestic and international best practices in this area.

GOVERNMENT STRUCTURE



- 
- AUDIT & SUSTAINABILITY COMMITTEE
 - APPOINTMENTS AND REMUNERATION COMMITTEE

 **More information** in detail of the governing bodies: <https://www.acciona.com/shareholders-investors/corporate-governance/board-directors-committees/>

COMMITMENT TO FIGHT AGAINST CORRUPTION



In 2018, the Sustainability Committee of the Board of Directors approved the new Policy Book, which includes revised versions of existing policies and new policies, integrating them into a single document comprising the following sections:

- Sustainability policies:
- Sustainability and Innovation
 - Economic and Good Governance Area
 - Social Sphere
 - Environmental Sphere
 - Other policies

 **More information** on the Policy Book at <https://www.acciona.com/shareholders-investors/corporate-governance/rules-governance/corporate-policies-book/>

EXPONENTIAL LEADERSHIP

GOVERNANCE

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ACCIONA'S ANTI CORRUPTION GUIDELINES

The company strictly forbids:

1. Offering or accepting bribes to or from civil servants or private individuals.
2. Offering or accepting facilitation payments to initiate or expedite administrative proceedings.
3. Offering or accepting gifts and hospitality to or from civil servants or any other third party in violation of these Guidelines.
4. Making contributions on behalf of the group with political aims.
5. Obtaining preferential treatment by using sponsorship or donations as a means of obtaining it.
6. Using the company's business relationships and contacts for one's own benefit or that of a third party.
7. Establishing business relationships with third parties without complying with minimal due diligence duties as regards third-party knowledge

Anti-money laundering measures ACCIONA has imposed a company-wide obligation on all employees to pay special attention to cases where there are indications of a lack of integrity on the part of the persons or entities with which they have business relations. Except in rare cases, cash payments are not permitted and require explicit authorisation with traceable supporting documentation. Furthermore, the group has established controls in matters of payments and due diligence procedures, suppliers and business partners. In 2020 compulsory training courses were given to the staff of the liable parties at ACCIONA and ACCIONA Energía.

Due diligence of third parties This procedure is carried out through the PROCUR-e (for suppliers) and PROCUR-e 3P (partners, intermediaries and commercial agents acting on behalf of ACCIONA) portals for ACCIONA S.A. and its subsidiaries. In addition, the company has three documents that describe how to perform due diligence: the Corporate Procurement Standard, the Corporate Procedure for the Certification and Evaluation of Suppliers, and the Corporate Standard for the Hiring of Commercial Consultants. At the end of 2020, ACCIONA replaced Procur-e 3P with a new third-party management tool: the Dow Jones RiskCenter KYBP.

Code of conduct The Code of Conduct sets out the values that should guide the behaviour of all ACCIONA companies, including ACCIONA Energía. Its aim is to reinforce the type of business conduct that is accepted and respected by all employees and managers. The Code of Conduct addresses a variety of issues, from the ethics and compliance model to the basic principles of action or guidelines for behaviour relating to respect for human rights, to the prevention of money laundering. The Code of Conduct and the Anti-corruption Action Guidelines must be read and accepted by all employees; more than 20,000 people have already accepted them.

EXPONENTIAL LEADERSHIP

TRANSPARENCY

TAX POLICY

Transparency and fiscal responsibility are important issues for ACCIONA, and are directly related to economic performance. The company's tax policy, approved in 2015 by the Board of Directors, defines the company's approach to all matters relating to taxation, as well as its consistency with the global business strategy. Applicable to all group companies, including ACCIONA Energía this policy is based on three fundamental values: social responsibility; financial soundness, return and results; and honesty. Likewise, the adoption of policies to promote greater fiscal transparency is one of the objectives contained in the Sustainability Master Plan.

ACCIONA's tax policy is available (in Spanish) at:

https://mediacdn.acciona.com/media/pqbhpic5/estrategia_fiscal.pdf

Governance and control of tax policy

ACCIONA Group Board of Directors is responsible for defining the company's tax strategy, as well as ensuring compliance through an appropriate control and supervision system. The Board therefore assumes the following non-delegable powers:

- The design of the company's tax policy.
- The determination of tax risk control and management policies.
- The certification of investments or operations which, due to their high amount or special characteristics, are of a strategic nature or have a particular tax risk, unless their authorisation corresponds to the General Shareholders' Meeting.
- The certification of the creation or acquisition of shares in special purpose entities or entities domiciled in countries or territories considered tax havens.
- Consent for any analogous transaction which, due to its complexity, could undermine the transparency of the company and its group.

The Audit Committee is responsible for supervising the effectiveness of the tax risk control and management systems. The Tax Department is responsible for developing the principles of the tax strategy, and establishing the control mechanisms and internal rules necessary to ensure compliance with current regulations and the aforementioned principles.

In addition, Tax risks are incorporated into ACCIONA's Risk Map, using the same methodology and mitigation plans applied to the rest of the group's risks.

The Ethical Channel allows for confidential reporting of irregular conduct related to any alleged breach of the Code of Conduct. The mailbox is available to the company's employees, suppliers and contractors.

Tax-related content presented in the Sustainability Report is verified in accordance with the ISAE 3000 standard by an independent auditor, as is the rest of the report.

EXPONENTIAL LEADERSHIP

TRANSPARENCY

COUNTRY BY COUNTRY INFORMATION

The following table includes information on all the tax jurisdictions in which the entities included in ACCIONA's Consolidated Financial Statements are resident for tax purposes.

Tax jurisdiction	Total sales (M€)	EBT (M€)	Corporate Income Tax accrued (M€)	Corporate Income Tax paid on a cash basis (M€)	Employees at the close of 2020	Grants (M€)	Footnote explaining effective rate due	Footnote explaining effective rate paid
Spain	2,673	367	51	-0.7	20,860	4.8	1	2
Germany	12	75	-8	-0.1	428	0	1	2
Mexico	238	54	19	7.1	1,978	0	5, 8	9
Australia	881	33	13	0.0	1,704	0	4, 5	10
Poland	335	19	4	1.4	1,523	0	4	9
Saudi Arabia	329	10	6	6.6	131	0	4	4
Portugal	152	9	7	5.2	2,015	0.01	7	11
Brazil	44	-8	-16	0.2	390	0	3	2
USA	71	-41	-6	0.0	184	1.3	7	2, 10
Canada	327	-44	-0,1	0.1	1,379	0	7	2
Others	1,409	35	27	24.8	7,763	0.3		
Total	6,472	508	97	44.5	38,355	6.4		

The complete list of ACCIONA companies, and also their main activities, is published annually in appendices I, II and III of the Consolidated Financial Statements.

Furthermore, the social cash flow and tax contribution is published in the Summarised Report. Notes on the "Reconciliation of the accounting profit to the taxable profit", "Taxes recognised in equity", "Deferred taxes" and "Reporting Obligations" are published in the Financial statements.

The Earnings Before Taxes (EBT) is the consolidated figure after allocating corporate analytical costs.

Explanatory notes on the differences between the effective tax rates and the nominal tax rates:

1. Reversal of non-deductible expenses (non-taxable income).
2. Tax losses in the year.
3. Application of unrecorded tax credits.
4. Allocation of consolidation vs local accounts (Corporation Tax payments).
5. Tax rate for Corporation Tax higher than in Spain.
6. Tax rate for Corporation Tax lower than in Spain.
7. Non-capitalisation (recording) of tax credits.
8. Non-deductible expenses and adjustment for inflation.
9. Application of tax credits.
10. Deferral for accelerated depreciation / unrestricted depreciation.
11. Non-application of the tax consolidation system.

At 31 December 2020, the amount of capital grants and operating grants received by the company amounted to € 848,000 and € 5,539,000.

None of the jurisdictions in which ACCIONA operates is considered a tax haven under Spanish legislation contained in Royal Decree 1080/1991, as amended by Royal Decree 116/2003.

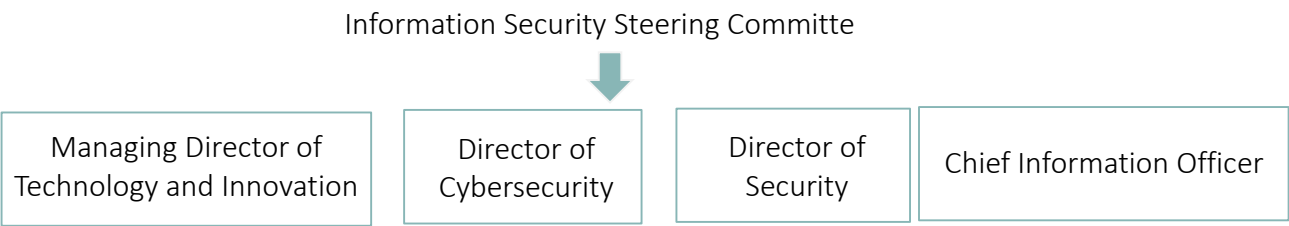
EXPONENTIAL LEADERSHIP

GOVERNANCE

One of ACCIONA Energía’s commitments in the area of corporate governance is to strive for continuous improvement and greater transparency, efficiency and rigour in the operation of its governing bodies. This factor is decisive for the generation of trust and long-term commitment between ACCIONA Energía and its stakeholders.

CYBERSECURITY

The company has an Information Security Steering Committee, composed of the Managing Director of Technology and Innovation, the Director of Security, the Chief Information Officer and the Director of Cybersecurity.



This committee is the body responsible for establishing strategy, and for driving, prioritising and managing the follow-up of security plans and programmes in a potential crisis situation that may originate from an incident related to the security of reporting or information systems. It also oversees security risks and issues, reporting to the Board of Directors when requested

ACCIONA's cybersecurity framework is based on the NIST standard, which defines all processes and activities under the supervision of the relevant management. The company has a corporate information security policy and an employee awareness and training plan, as well as procedures and mechanisms for any employee to report a security incident or any suspected incident. It also has an ISO 27001 certification for the information security management system associated with the security services provided internally from the central offices. The group has established processes to prevent information system interruptions and cyberattacks.

A Contingency Plan is in place, which is reviewed and tested on a six-monthly basis, and covers specific applications.

There were no security incidents in 2020 that compromised customers' personal data.

RISK MANAGMENT

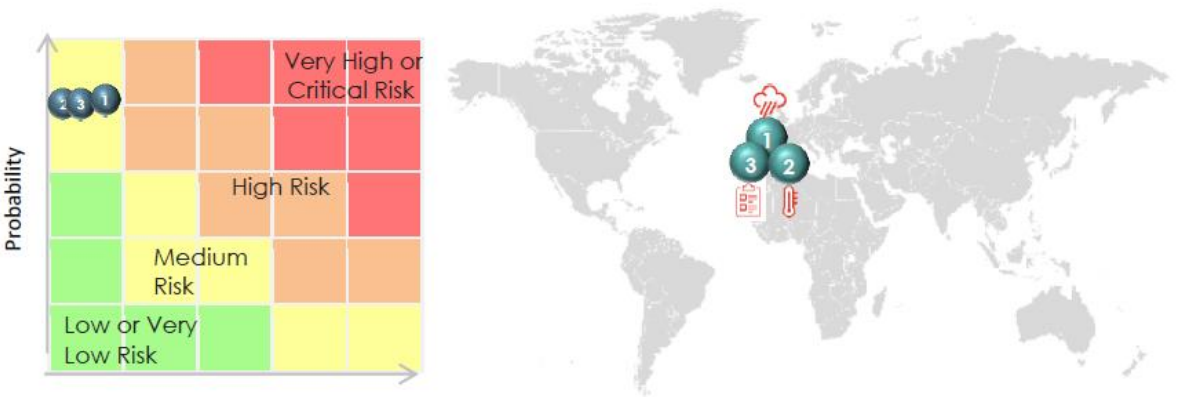
Risk management is a process driven by the ACCIONA Board of Directors consisting of identifying, assessing and managing the potential events that might affect the company and the effects they have. The analysis is conducted from four perspectives: market, financial, emerging trends (including **cyber security**) and ESG.

EXPONENTIAL LEADERSHIP

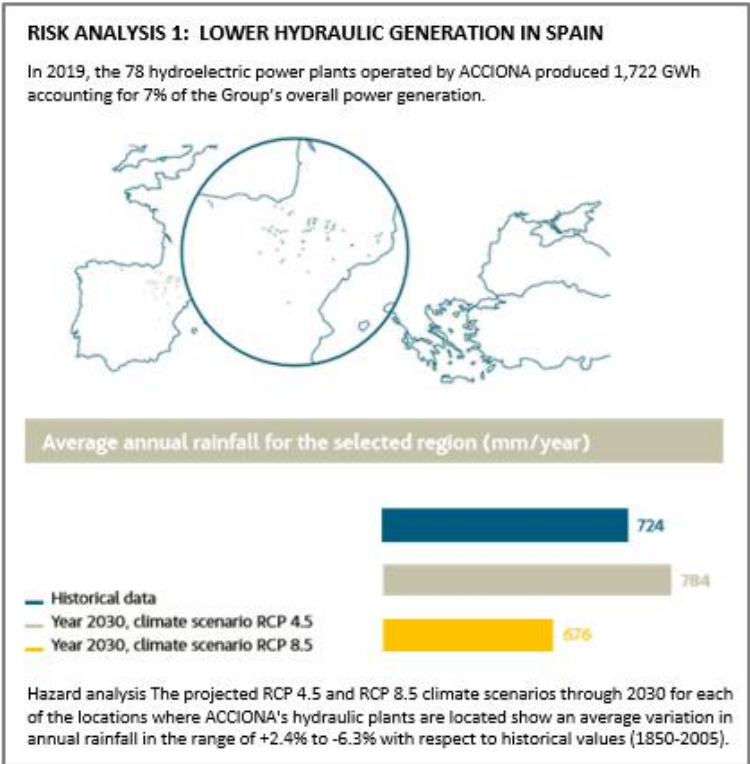
TRANSPARENCY

ACCIONA Energía analyzes and discloses its climate risks and opportunities in accordance with the European Commission's climate reporting guidelines and the recommendations of the Financial Stability Board, through its Task Force on Climate-Related Financial Reporting (TCFD).

KEY CLIMATE RISKS



- 1 Lower hydraulic generation in Spain due to reduced run-off.
- 2 Loss of efficiency in the electrical conversion of wind turbines in Spain due to increased working temperatures.



- Opportunities:**
- Increase in the demand for renewable generation infrastructure due to changes in climate change regulations.
 - Increased demand for water treatment infrastructure in regions projected to face greater shortages due to climate change.

S U S T A I N A B I L I T Y
P E R F O R M A N C E
I N T E G R A T E T O
T R A N S F O R M

INTEGRATE TO TRANSFORM

SOLUTIONS BASED APPROACH

SOCIAL-ECONOMIC IMPACT OF THE PROJECTS

Since 2015, ACCIONA Energía has been measuring the socioeconomic and environmental impact of its projects in different countries, in order to understand and enhance the benefits they generate throughout their life cycle.

The company uses the economic model based on input-output tables (analysis of the relationships between different industries) to identify and measure the socio-economic and environmental benefits generated by the energy projects from start to finish. Through this tool the company obtains quantitative results of the direct, indirect and induced impact of its operations in terms of job creation and contribution to the gross domestic product GDP of each country, and also in the environment and communities.

In 2020, ACCIONA Energía has made 19 analyses of the social-economic and environmental impact which have been integrated into several offers, negotiations and tenders, and also in the response to requirements from regulators and customers. The calculation tool has been implemented in the reporting system to gain more speed and reliability in the report, and to include fields and technologies other than wind and photovoltaic energy, such as biomass or hydrogen.

Social-economic impact and environmental in the Macintyre wind farm (Australia)

This 1,026 MW facility will contribute significantly to the country's growth, job creation and improvements in the environment during the entire life cycle of the project, as described below:

- Contribution to the GDP: AUD 1,737 million equivalent to the GDP per capita of 26,754 Australians.
- Job creation: 1,854 direct, indirect and induced jobs during the entire life cycle of the project.
- Emissions avoided: 2,647,700 tCO₂ per year, equivalent to the consumption of 572,000 cars.
- Water saved: 5,468,215 m³ of water per year, equivalent to 2,187 Olympic swimming pools.
- Improvement of air quality: 24,800 tonnes of SO₂ and NO_x avoided per year, which translates as savings in medical costs associated to respiratory diseases amounting to AUD 50 million.

Social-economic and environmental impact on the Tolpán Sur wind farm (Chile)

ACCIONA Energía's third wind facility in the country, with the capacity to produce 84 MW of power, creates the following impacts:

- Contribution to the GDP: € 130 million, equivalent to the GDP per capita of 9,655 Chileans.
- Job creation: 1,182 direct, indirect and induced jobs during the entire life cycle of the project.
- Emissions avoided: 266,600 tCO₂ per year, equivalent to the consumption of 55,600 cars.
- Water saved: 534,725 m³ of water per year, equivalent to 214 Olympic swimming pools.
- Improvement of air quality: 2,263 tonnes of SO₂ and NO_x avoided per year, which translates as savings in medical costs associated to respiratory diseases amounting to € 2.78 million.

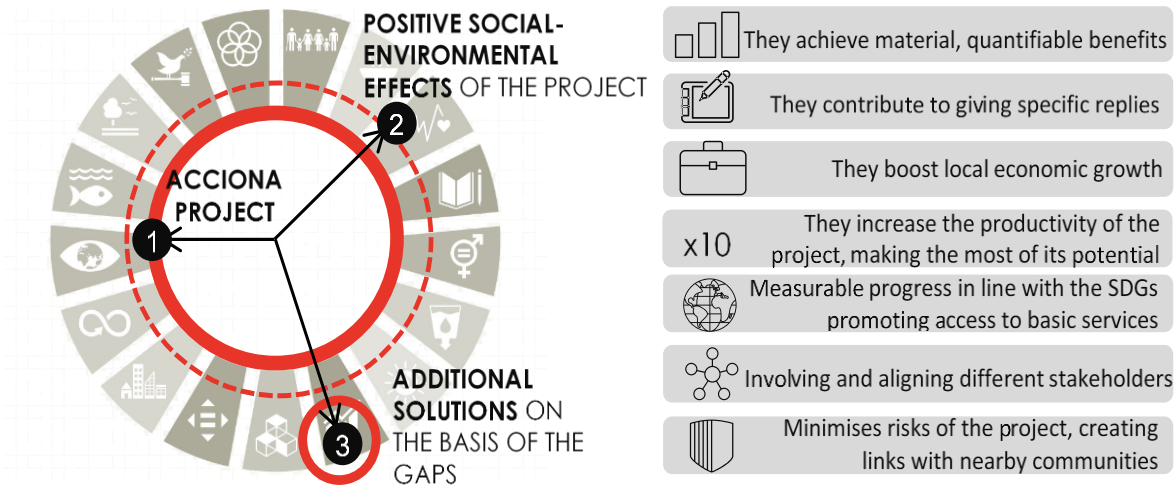
INTEGRATE TO TRANSFORM

SUSTAINABLE DIFFERENCE IN EVERY PROJECT

The company aims to demonstrate the sustainable difference inherent in each activity it undertakes. During execution, the business lines, and especially the projects, develop their own distinctive regenerative/sustainable features, which are recognisable by third parties.

HIGH IMPACTS SOLUTIONS

ACCIONA Energía seeks to enhance the transformative effect of its projects by maximizing the impact they generate in terms of local impact, return on investment, and the acceleration of sustainable development. To this end, it has designed business solutions called High Impact Solutions, which, through the inclusion of adjacent projects, contribute to improving the living conditions of the population and/or the environment in the vicinity of the company's operations. The ultimate goal is to make projects economically sustainable.



METHODOLOGY

1. Project identification
2. Diagnosis of socio-economic gaps in the immediate area surrounding the project.
3. Consultation with local experts
4. Communication with investment agents and external partners
5. Definition of solutions and completion of financing
6. Implementation of the proposed solutions for adjacent areas
7. Measurement and management of impact generated

High Impact Solution for wind farms

ACCIONA has one wind farm in operation in Tamaulipas, El Cortijo. The company has carried out an expansion of studies into the socio-environmental gaps in the vicinity of these wind farms, including field surveys and on-site visits to the most important ejidos (communally owned land), as well as to public institutions at local, municipal, community and state level. Potential High Impact Solutions were analysed, focusing on the supply and distribution of drinking water. Development of the solution will continue in 2021, with a view to its implementation and maintenance in the coming years.

INTEGRATE TO TRANSFORM

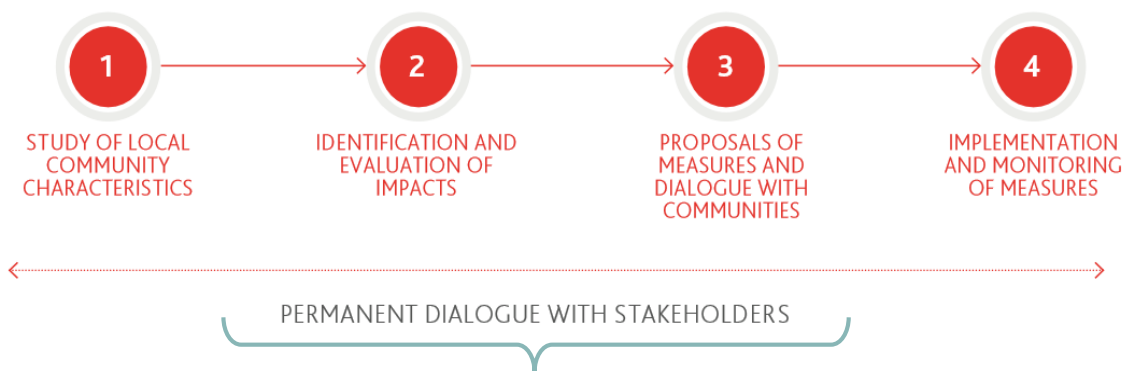
REGENERATIVE ECOSYSTEMS

The goal is to develop an ecosystem of organisations that is capable of increasing the potential for regenerative transformation.

SOCIAL IMPACT MANAGEMENT

ACCIONA has its own methodology for identifying, assessing and managing all impacts derived from its business. A key tool for measuring and improving the environment and communities with which we assess impacts, common but adapted to the corporation's business and based in all the countries where we work. The corporation's own methodology is based on international standards and these four main phases:

METHODOLOGY



1. Study of the degree of the project's social risk by characterizing the social risk from the design and tender phase.
2. Analysis of the sociodemographic of the population in the project's area of influence, identification and assessment of the positive or negative social impacts and preparation of a proposal of social measures.
3. Depending on the type of project, lines of communication or dialogue are set up with the local communities and other stakeholders in order to inform them about the project, its main impacts and the social measures that are going to be carried out.
4. Launch of the measures identified to prevent and mitigate any negative social impacts and to bolster the positive impacts.

2017-2020 SIM METRICS

- 13 countries.
- 711 initiatives.
- 775,853 people benefiting.
- Total budget of 9,404,963 euros

SIM AUDITS

Since 2017, 9 external audits have been carried out in order to assess the degree of application of the SIM methodology.
(4 in Chile, 2 in México, 1 in Costa Rica, 2 in Australia)

INTEGRATE TO TRANSFORM

FINANCING IMPACT

Maximizing the capacity of sustainable finances enhances the company’s value and the competitive regenerating advantages of the projects.

ACCIONA Energía promotes innovative solutions for sustainable funding which make it possible to create differences and advantages in the development of regenerative infrastructure, building on the interest of the capital markets in financing the existing gaps in fulfilment of the Sustainable Development Goals.

Maximizing the capacity of sustainable finances enhances the company’s value and the competitive regenerating advantages of the projects. ACCIONA promotes innovative solutions for sustainable funding which make it possible to create differences and advantages in the development of regenerative infrastructure, building on the interest of the capital markets in financing the existing gaps in fulfilment of the Sustainable Development Goals.



2020 Social Contribution

More than €3M

(LBG methods, itemised according to Sustainable Development Goals)

Charitable Donations (% of total costs)	16.10%
Community Investments (% of total costs)	68.80%
Commercial Initiatives (% of total costs)	15.20%

SUSTAINABILITY RECOGNITIONS

ESG RATING

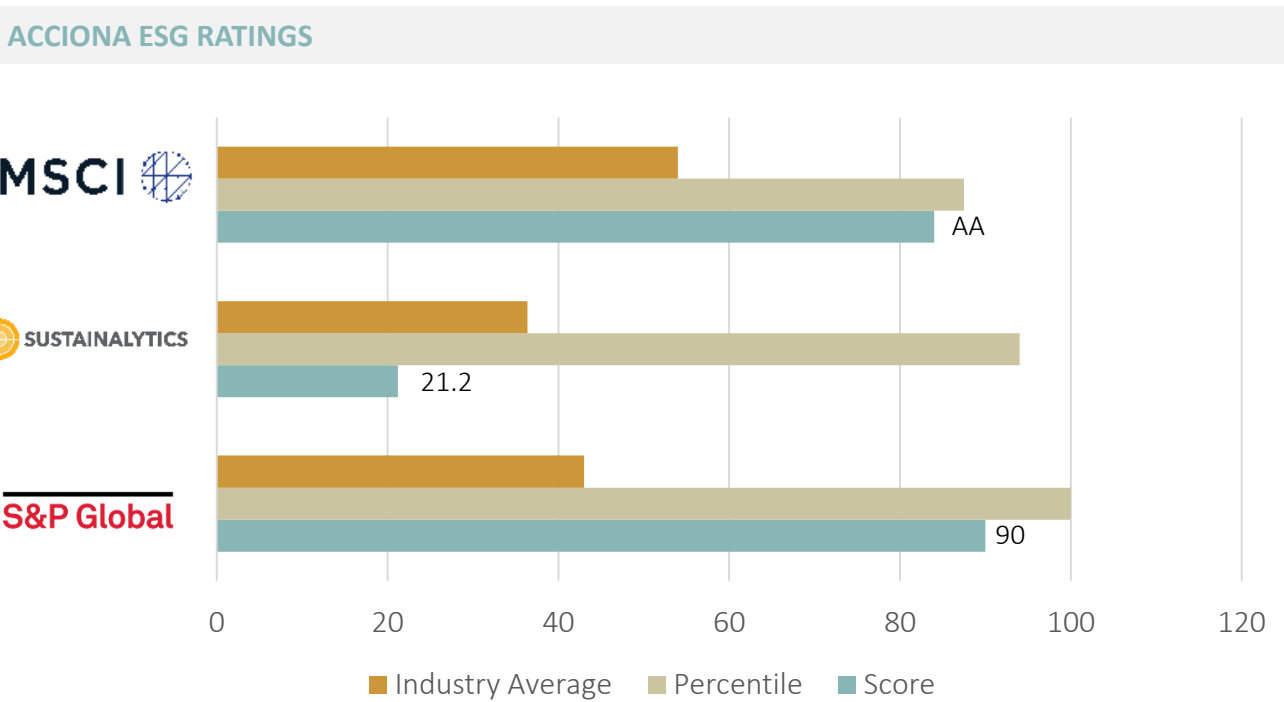
ESG RECOGNITIONS



ACCIONA Energía has once again confirmed its position as the world's "greenest" electricity generation company, occupying 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.

ACCIONA EXTERNAL ESG RATINGS IN THE ELECTRIC UTILITY SECTOR*

* These ratings refer to ACCIONA, ACCIONA Energía's parent company, while assessed against electric utility peers. ACCIONA Energía has not been assessed yet by the closure of this report (10 June 2021).




The Sustainalytics ESG Risk Rating gives a lower score to companies with less exposure and better management of their ESG risks

ACCIONA closed 2020 as the leading electricity utility company in sustainability, according to the Sustainability Yearbook 2021, elaborated by S&P Global. ACCIONA, with a score of 90 out of 100, leads the electricity utility sector.

As a result, S&P Global award ACCIONA the **SAM Gold Class**, a distinction that places it on the podium of the best utilities in the world in terms of sustainability.

Sustainability Award
Gold Class 2021



GRI CONTENT INDEX

GRI CONTENT INDEX

This report has been prepared in accordance with GRI Standards: core option.

GRI	Page	Section of the report
GRI 102 - GENERAL DISCLOSURES (2016 version)		
ORGANIZATIONAL PROFILE		
102-1 Name of the organization	5	OUR COMPANY - Introduction to Acciona Energía
102-2 Name of the organization	5	OUR COMPANY - Introduction to Acciona Energía
102-3 Name of the organization	Avenida de Europa 10, Alcobendas, Madrid, Spain	GRI Content Index
102-4 Location of operations	6	MAIN FIGURES – ACCIONA Energía in figures
102-5 Ownership and legal form	Corporación ACCIONA Energías Renovables S.A.	GRI Content Index
102-6 Markets served	6	MAIN FIGURES – ACCIONA Energía in figures
102-7 Scale of the organization	6	MAIN FIGURES – ACCIONA Energía in figures
102-8 Information on employees and other workers	6	MAIN FIGURES – ACCIONA Energía in figures
102-9 Supply chain	5	OUR COMPANY - Introduction to Acciona Energía
102-10 Significant changes to the organization and its supply chain	5	OUR COMPANY - Introduction to Acciona Energía
102-11 Precautionary Principle or approach	21	PEOPLE CENTRIC - Environment
	33	POSITIVE PLANET - Water
	43	EXPONENTIAL LEADERSHIP - Governance
102-12 External initiatives	9	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-13 Membership of associations	ACCIONA participates in sectorial associations at regional and national levels (e.g. AEE, APPA and UNEF), and also at European (WindEurope and CLG Europe) and international levels (GWEC).	GRI Content Index

GRI CONTENT INDEX

GRI	Page	Section of the report
STRATEGY		
102-14 Statement from senior decision-maker	9	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-15 Key impacts, risks, and opportunities	23	PEOPLE CENTRIC - Access
	29	POSITIVE PLANET - Biodiversity
	48	INTEGRATE TO TRANSFORM - Regenerative ecosystems
ETHICS AND INTEGRITY		
102-16 Values, principles, standards, and norms of behavior	23 - 24	PEOPLE CENTRIC - Access
102-17 Mechanisms for advice and concerns about ethics	23 - 24	PEOPLE CENTRIC - Access
Governance		
102-18 Governance structure	39	EXPONENTIAL LEADERSHIP - Governance
102-19 Delegating authority	39	EXPONENTIAL LEADERSHIP - Governance
102-20 Executive-level responsibility for economic, environmental, and social topics	39	EXPONENTIAL LEADERSHIP - Governance
102-22 Composition of the highest governance body and its committees	39	EXPONENTIAL LEADERSHIP - Governance
102-23 Chair of the highest governance body	39	EXPONENTIAL LEADERSHIP - Governance
102-24 Nominating and selecting the highest governance body	39	EXPONENTIAL LEADERSHIP - Governance
102-25 Conflicts of interest	39	EXPONENTIAL LEADERSHIP - Governance
102-26 Role of highest governance body in setting purpose, values, and strategy	39	EXPONENTIAL LEADERSHIP - Governance
102-28 Evaluating the highest governance body's performance	39	EXPONENTIAL LEADERSHIP - Governance
102-29 Identifying and managing economic, environmental, and social impacts	39	EXPONENTIAL LEADERSHIP - Governance
102-31 Review of economic, environmental, and social topics	39	EXPONENTIAL LEADERSHIP - Governance
102-32 Highest governance body's role in sustainability reporting	8	SUSTAINABILITY AS A CORE - Sustainability Governance
102-33 Communicating critical concerns	8	SUSTAINABILITY AS A CORE - Sustainability Governance
STAKEHOLDER ENGAGEMENT		
102-40 List of stakeholder groups	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-41 Collective bargaining agreements	24	PEOPLE CENTRIC - Access
102-42 Identifying and selecting stakeholders	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-43 Approach to stakeholder engagement	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-44 Key topics and concerns raised	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy

GRI CONTENT INDEX

GRI	Page	Section of the report
REPORTING PRACTICE		
102-45 Entities included in the consolidated financial statements	42	EXPONENTIAL LEADERSHIP - Transparency
102-46 Defining report content and topic Boundaries	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-47 List of material topics	10	SUSTAINABILITY AS A CORE - Constructing the sustainability strategy
102-48 Restatements of information	Not applicable: first year of reporting	GRI Content Index
102-49 Changes in reporting	Not applicable: first year of reporting	GRI Content Index
102-50 Reporting period	1	ACCIONA ENERGÍA - Sustainability Report 2020
102-51 Date of most recent report	1	ACCIONA ENERGÍA - Sustainability Report 2020
102-52 Reporting cycle	Annual	GRI Content Index
102-53 Contact point for questions regarding the report	responsabilidadcorporativa@acciona.es	GRI Content Index
102-54 Claims of reporting in accordance with the GRI Standards	53	GRI Content Index
102-55 GRI content index	53	GRI Content Index
102-56 External assurance	59	Independent assurance report
ECONOMIC ISSUES		
GRI 201 - Economic Performance (2016)		
103 Management Approach	42	EXPONENTIAL LEADERSHIP - Transparency
201-1 Direct economic value generated and distributed	42	EXPONENTIAL LEADERSHIP - Transparency
201-4 Financial assistance received from government	42	EXPONENTIAL LEADERSHIP - Transparency
GRI 203 - Indirect Economic Impacts (2016)		
103 Management Approach	8	SUSTAINABILITY AS A CORE - Sustainability Governance
203-1 Infrastructure investments and services supported	26	POSITIVE PLANET - Climate
	38	EXPONENTIAL LEADERSHIP - Sustainable transformational innovation
	18	PEOPLE CENTRIC - Diversity and inclusion
203-2 Significant indirect economic impacts	46	INTEGRATE TO TRANSFORM - Solutions based approach
GRI 205 - Anticorruption (2016)		
103 Management Approach	40	EXPONENTIAL LEADERSHIP - Governance
205-2 Communication and training about anti-corruption policies and procedures	40	EXPONENTIAL LEADERSHIP - Governance

GRI CONTENT INDEX

GRI	Page	Section of the report
GRI 207 - Tax (2019)		
103 Management Approach	41	EXPONENTIAL LEADERSHIP - Transparency
207-1 Approach to tax	41	EXPONENTIAL LEADERSHIP - Transparency
207-2 Tax governance, control and risk management	41	EXPONENTIAL LEADERSHIP - Transparency
207-3 Stakeholder engagement and management concerns related to tax	41	EXPONENTIAL LEADERSHIP - Transparency
207-4 Country-by-country reporting	42	EXPONENTIAL LEADERSHIP - Transparency
ENVIRONMENTAL ISSUES		
GRI 302 - Energy (2016)		
103 Management Approach	5	OUR COMPANY - Introduction to ACCIONA Energía
302-1 Energy consumption within the organisation	5	OUR COMPANY - Introduction to ACCIONA Energía
GRI 303 - Water and effluents (2018)		
103 Management Approach	33	POSITIVE PLANET - Water
303-1 Interactions with water as a shared resource	33	POSITIVE PLANET - Water
303-2 Management of water discharge related impacts	33	POSITIVE PLANET - Water
303-3 Water withdrawal	33	POSITIVE PLANET - Water
303-4 Water discharge	33	POSITIVE PLANET - Water
303-5 Water consumption	33	POSITIVE PLANET - Water
GRI 304 - Biodiversity (2016)		
103 Management Approach	30	POSITIVE PLANET - Biodiversity
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	30	POSITIVE PLANET - Biodiversity
304-2 Significant impacts of activities, products, and services on biodiversity	29	POSITIVE PLANET - Biodiversity
304-3 Habitats protected or restored	30	POSITIVE PLANET - Biodiversity
304-4 UICN Red List species and national conservation list species with habitats in areas affected by operations	30	POSITIVE PLANET - Biodiversity
GRI 305 - Emissions (2016)		
103 Management Approach	26	POSITIVE PLANET - Climate
305-5 Reduction of GHG emissions	6	MAIN FIGURES – ACCIONA Energía in figures
	26	POSITIVE PLANET - Climate
GRI 306 - Efluentes y residuos (2016)		
103 Management Approach	26	POSITIVE PLANET - Climate
306-1 Water discharge by quality and destination	33	POSITIVE PLANET - Water
306-2 Waste by type and disposal method	31	POSITIVE PLANET - Circularity

GRI CONTENT INDEX

GRI	Page	Section of the report
GRI 308 - Supplier Environmental Assessment (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
308-1 New suppliers that were screened using environmental criteria	40	EXPONENTIAL LEADERSHIP - Governance
308-2 Negative environmental impacts in the supply chain and actions taken	24	PEOPLE CENTRIC - Access
SOCIAL ISSUES		
GRI 401 - Labour (2016)		
103 Management Approach	16	PEOPLE CENTRIC - Leadership
401-1 New employee hires and employee turnover	16	PEOPLE CENTRIC - Leadership
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	19	PEOPLE CENTRIC - Recognition
GRI 403 - Occupational Health & Safety (2018)		
103 Management Approach	21	PEOPLE CENTRIC - Health & Safety
403-1 Occupational health and safety management system	21	PEOPLE CENTRIC - Health & Safety
403-2 Hazard identification, risk assessment, and incident investigation	21	PEOPLE CENTRIC - Health & Safety
403-3 Occupational health services	21	PEOPLE CENTRIC - Health & Safety
403-4 Worker participation, consultation, and communication on occupational health and safety	22	PEOPLE CENTRIC - Health & Safety
403-5 Worker training on occupational health and safety	21	PEOPLE CENTRIC - Health & Safety
403-6 Promotion of worker health	22	PEOPLE CENTRIC - Health & Safety
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	21-22	PEOPLE CENTRIC - Health & Safety
403-10 Work-related ill health	21	PEOPLE CENTRIC - Health & Safety
GRI 404 - Training & Education (2016)		
103 Management Approach	15	PEOPLE CENTRIC - Leadership
404-1 Average hours of training per year per employee	15	PEOPLE CENTRIC - Leadership
404-2 Programmes for upgrading employee skills and transition assistance programmes	16	PEOPLE CENTRIC - Leadership
GRI 405 - Diversity and equal opportunity (2016)		
103 Management Approach	17	PEOPLE CENTRIC - Diversity and inclusion
405-1 Diversity of governance bodies and employees	17	PEOPLE CENTRIC - Diversity and inclusion
GRI 406 - No discrimination (2016)		
103 Management Approach	17	PEOPLE CENTRIC - Diversity and inclusion
406-1 Cases of discrimination and corrective measures undertaken	The Ethical Channel has not received complaints for discrimination, harassment at work or sexual harassment. GRI Content Index	

GRI CONTENT INDEX

GRI	Page	Section of the report
GRI 407 - Freedom of Association and Collective Bargaining (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	24	PEOPLE CENTRIC - Access
GRI 408 - Child Labour (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
408-1 Operations and suppliers at significant risk for incidents of child labour	24	PEOPLE CENTRIC - Access
GRI 409 - Forced or Compulsory Labour (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	24	PEOPLE CENTRIC - Access
GRI 410 - Security Practices (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
410-1 Security personnel trained in human rights policies or procedures	Security personnel has received formal training in the organization's human rights policies or specific procedures, including third-party organizations providing security personnel.	GRI Content Index
GRI 412 - Evaluation of human rights (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
412-1 Operations that have been subject to human rights reviews or impact assessments	24	PEOPLE CENTRIC - Access
412-2 Employee training on human rights policies or procedures	24	PEOPLE CENTRIC - Access
412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	24	PEOPLE CENTRIC - Access
GRI 413 - Local Communities (2016)		
103 Management Approach	23	PEOPLE CENTRIC - Access
413-1 Operations with local community engagement, impact assessments, and development programmes	18 24	PEOPLE CENTRIC - Diversity and inclusion PEOPLE CENTRIC - Access
413-2 Operations with significant actual and potential negative impacts on local communities	23 48	PEOPLE CENTRIC - Access INTEGRATE TO TRANSFORM - Regenerative ecosystems
GRI 414 - Supplier Social Assessment (2016)		
103 Management Approach	24	PEOPLE CENTRIC - Access
414-1 New suppliers that were screened using social criteria	24 40	PEOPLE CENTRIC - Access EXPONENTIAL LEADERSHIP - Governance
414-2 Negative social impacts in the supply chain and actions taken	24	PEOPLE CENTRIC - Access
GRI 418 - Customer Privacy (2016)		
103 Management Approach	43	PEOPLE CENTRIC - Access
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	43	EXPONENTIAL LEADERSHIP - Governance



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

Independent Assurance Report on 2020 Sustainability Report of Corporación ACCIONA Energías Renovables, S.A.

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

We have been engaged by management of Corporación ACCIONA Energías Renovables, S.A (hereinafter CAER) to provide limited assurance on the Sustainability report for the year ended 31 December 2020 (hereinafter "the Report").

Responsibilities of CAER Management

Management of Corporación ACCIONA Energías Renovables is responsible for the preparation and presentation of the Report in accordance with the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards): core option, as described in point 102-54 of the GRI content Index of the Report. Management is also responsible for the information and assertions contained within the report; for determining CAER's objectives in respect of the selection and presentation of sustainable development performance, including the identification of stakeholders and material issues; and for establishing and maintaining appropriate performance management and internal control systems from which the reported performance information is derived.

These responsibilities include establishing the controls that CAER management considers necessary to provide limited assurance that the preparation of indicators is free of material misstatements whether due to fraud or error.

Our responsibility

Our responsibility is to carry out a limited assurance review and to express a conclusion based on the work performed, referring exclusively to the information corresponding to 2020.

We conducted our engagement in accordance with the requirements of the Revised International Standard on Assurance Engagements 3000, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised), issued by the International Auditing and Assurance Standard Board (IAASB) of the International Federation of Accountants (IFAC); and with the 21th Performance Guide for the revision of Corporate Responsibility Reports issued by the Spanish Institute of Registered Auditors (ICJCE). These standards require that we plan and perform the engagement to obtain limited assurance about whether the Report is free from material misstatements.

Our firm applies International Standard on Quality Control 1 (ISQC1) and, in conformity with this Standard, maintain a comprehensive system of quality control including documented policies and procedures regarding the compliance with ethical principles, professional standards and applicable legal and regulatory requirements.

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

Procedures performed

Our limited assurance engagement has been carried out by making inquiries of management and personnel responsible for the preparation of information presented in the Report, and applying certain analytical and evidence gathering procedures. These procedures included:

- Verification of CAER's processes for determining the material issues, and the stakeholder participation therein.
- Verification, through interviews with management and relevant staff at group level and selected business unit level, of the presence of sustainability strategy and policies and corporate responsibility to attend to material issues, and the implementation of these across the business of CAER.
- Assessment of the consistency of the description of the application of CAER's policies and strategy on sustainability, governance, ethics and integrity.
- Risk analysis, including searching the media to identify material issues during the year covered by the Report.
- Review of consistency of information comparing the Universal Standards with internal systems and documentation.
- Analysis of the processes of compiling and internal control over quantitative data reflected in the Report, regarding the reliability of the information, by using analytical procedures and review testing based on sampling.
- Review of the application of the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards) requirements, in accordance with core option.
- Reading the information presented in the Report to determine whether it is in line with our overall knowledge of, and experience with, the sustainability performance of CAER
- Comparison between the financial information presented in the Report and those included in ACCIONA's Annual Accounts audited by independent third parties.

Our multidisciplinary team included specialists in dialogue with stakeholders, and social, environmental and economic business performance.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less wide than a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than that of a reasonable assurance engagement. This report may not be taken as an auditor's report.



Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this Independent Assurance Report.

We believe that the evidences we have obtained are sufficient and appropriate to provide a basis for our conclusions.

Based on the procedures performed and the evidences obtained, nothing has come to our attention that causes us to believe that the Report has not been prepared, in all material respects, in accordance with the Sustainability Reporting Standards of Global Reporting Initiative (GRI Standards), in its core option, as described in point 102-54 of the GRI content Index of the Report, including the reliability of data, adequacy of the reported information and the absence of significant deviations and omissions.

Purpose of our report

In accordance with the terms of our engagement, this Independent Assurance Report has been prepared for Corporación ACCIONA Energías Renovables, S.A. in relation to its 2020 Sustainability Report and thus may not be suitable for other purposes or in any other context.

KPMG Asesores, S.L.

A handwritten signature in blue ink, appearing to read 'Patricia Reverter Guillot', with a stylized flourish at the end.

Patricia Reverter Guillot

10 June 2021