

STAKEHOLDER RELATIONS POLICY

PURPOSE

The purpose of this policy is to promote a culture of ongoing dialogue and long-term commitment with stakeholders as part of the company's decision-making process.

This policy elaborates on the principles of the company's Code of Conduct, and it incorporates the purpose, fundamentals, principles, and due diligence process set in ACCIONA Energía's Sustainability Policy.

SCOPE

This policy applies to all ACCIONA Energía firms, including subsidiaries and companies wherever ACCIONA Energía operates.

The company encourages its suppliers, contractors, and associates, its investees and any economic interest groupings where the company does not have management control or a voting majority, and the business forums and associations in which it participates to adopt these principles.

FUNDAMENTS

The company states its intent to promote more-sustainable models of society in the [Articles of Association of CORPORACIÓN ACCIONA ENERGÍAS RENOVABLES, S.A. \(art. 2\)](#). As part of its search for long-term value creation, ACCIONA Energía defends the legitimate interests of its shareholders, workforce, suppliers, customers, and other stakeholders, benefiting society and the planet with the positive social and environmental impact of its activities.

Foremost among the company's main stakeholders are the people in the organization and their union representatives, the company's customers and users, local communities, partners, suppliers, contractors, subcontractors, public authorities and regulatory bodies, investors and analysts, the media, and civil society associations and organizations.

As part of the ACCIONA Group (a signatory of the **United Nations Global Compact**), ACCIONA Energía is aligned with the principles and objectives laid out in international accords and conventions, thus contributing to the achievement of Sustainable Development Goal (SDG) 17.

PRINCIPLES

- **Designing a sustainable commitment** – ACCIONA Energía sees relations with its stakeholders as a valuable, effective tool, and it encourages stakeholders to participate in the processes whereby the company creates and implements its sustainability strategy.
- **Proactive commitment** – ACCIONA Energía maintains regular, fluid, two-way communication with its stakeholders, listening and responding to their needs and expectations and incorporating their most important wants into the company's business strategy.
- **Capability development** – ACCIONA Energía facilitates stakeholders' relations with the company by making the means and resources for interaction available to stakeholders.

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- **Responsibilities and non-discrimination** – ACCIONA Energía promotes a commitment to inclusivity, where its stakeholders' needs can be met. The company fosters diversity, equity, and inclusion for all, and it undertakes to pay especially close attention to the processes involved in relations with minority and vulnerable groups. ACCIONA Energía acts responsibly from a stance of respect for all the human rights of its stakeholders.
- **Relations with local stakeholders** – ACCIONA Energía especially promotes relations with the stakeholders in the areas that are affected, for better or for worse, by its activities, projects, and services.
- **Free, informed consultation in advance with indigenous communities** – ACCIONA Energía consults with indigenous peoples and works with them in good faith to secure their free, informed consent in advance, in accordance with the International Labour Organization's Indigenous and Tribal Peoples Convention (ILO Convention 169).

STAKEHOLDER RELATIONS COMMITMENTS

- **Definition of relations' purpose and scope** – ACCIONA Energía defines the purpose of stakeholder relations according to the company's general strategy and operations, and it defines the scope of relations according to this purpose.
- **Stakeholder identification and prioritization**– ACCIONA Energía identifies and prioritizes its stakeholders through regular materiality analyses in connection with the objective and scope of its commitment. The company conducts an analysis to understand stakeholder profiles and evaluate stakeholders' capabilities.
- **Identification of the risks and opportunities involved in stakeholder relations** – ACCIONA Energía identifies, evaluates, and manages the risks and opportunities stemming from stakeholder relations in line with the company's risk management focus.
- **Definition of the company's stakeholder relations model**– ACCIONA Energía finds the level and method of stakeholder relations that best suits the purpose and scope of its commitment to its stakeholders. The company establishes participation strategies to accommodate its stakeholders' characteristics and capabilities.
- **Relations model performance tracking** – ACCIONA Energía regularly and systematically evaluates and supervises the efficacy of its participation processes, including the perspective of stakeholders.
- **Participation in decision-making processes** – ACCIONA Energía values its stakeholders' opinions in its decision-making processes.
- **Channels of communication** – ACCIONA Energía provides its stakeholders with suitable, physically and linguistically accessible channels for communicating their questions, suggestions and complaints.

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- **Continuous improvement** – ACCIONA Energía is always improving on its stakeholder relations commitment and models.
- **Information** – ACCIONA Energía reports the impacts, results, and actions plans stemming from stakeholder relations processes in an appropriate, timely way, both internally and externally.

GOVERNANCE

This policy is approved by the Board of Directors' Audit and Sustainability Committee, whose powers include supervision of compliance with policies and sustainability rules in environmental, social and corporate governance matters, internal codes, and codes of good conduct in business.

RIGHTS AND DUTIES

All persons within this policy's scope must uphold the commitments and the principles of responsible conduct in business and must respect human rights in the performance of their work. Conduct contrary to the Code of Conduct and the Stakeholder Relations Policy may be penalized.

POLICY REVIEW

ACCIONA Energía reviews its internal processes and policies regularly to ensure that they are effective, and it updates its policies whenever review findings so require, for continuous improvement.

REFERENCES

RELATED POLICIES

- Social Action Policy
- Water Policy
- Biodiversity Policy
- Climate Change Policy
- Human Rights Policy
- Diversity, Equity, and Inclusion Policy
- Circular Economy Policy
- Environmental Policy
- Human Resources and Occupational Health and Safety Policy
- Sustainability Policy
- Ethics Channel Operation Policy

RELATED PROCEDURES

- Corporate Standard on the Social Safeguards System
- Corporate Standard on Management of the Social Impact of Projects
- Corporate Instruction on Stakeholder Dialogue and Communication