

CIRCULAR ECONOMY POLICY

This policy implements the ACCIONA Energía ENVIRONMENTAL POLICY

ACCIONA Energía environmental policies seek to implement its commitment to driving process changes in the company that enable company activities to leave a positive footprint around the world.

The circular economy policy establishes an action framework conducive to environment regeneration, creating positive renewable energy balances by eliminating virgin materials and aspiring to full circularity for the materials it uses in its processes.

Definitions

The ACCIONA Energía circular economy comprehends the material resources, water and energy the company uses in its operating processes.

- **Reused material:** that which has been used and may be used again, without requiring any type of processing or transformation.
- **Repaired material:** that which recovers its function by means of being worked on or partially replacing its components.
- **Recycled material:** that which has been used and may be used again after undergoing treatment or a transformation process.
- **Renewable material:** that which is fully produced from natural resources, rapidly recoverable through ecological cycles or agricultural processes.
- **Separation:** properly separating components for later use in the operation or by third parties.
- **Total footprint:** a calculation based on a life cycle analysis that enables the selecting of materials that have a minor environmental impact.
- **Material:** raw material, products, by-products, components and water.

Principles

ACCIONA Energía seeks to develop projects that do not use virgin material or external fossil-based energy, thereby avoiding waste generation and regenerating the environment. To progress this ambition, its processes prioritise resource reduction, the use of renewable and recycled materials, with a view to giving new life to waste considering this as potential raw material, the use of reclaimed water and the consumption of renewable energy.

MATERIALS IN THE DESIGN PHASE

- **Virtualise** – Where possible, especially in prototype and test phases, designing digital models to avoid the need to use physical materials.
- **Leverage the use of technology** – Use technology to identify materials, maximise their use and increase separation, reuse and repair possibilities.
- **Take a life cycle view** – Apply the principles of life cycle analysis in design and material specification phases, progressing the application of management hierarchy.
- **Interchange to innovate** – Promote the replacement of resources for other more advanced ones that perform better and require less maintenance or substitution.

MAXIMISE OPERATIONAL CIRCULARITY

- **Use renewable energy** in all those operations where possible; and whenever it is not possible, look into alternatives and maximise machinery fuel use on routes, stopping times, driving practices, etc.
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- **Increase operational productivity** – Plan and intensify the use of technology to reduce the consumption of materials and energy, anticipate and avoid rejections, errors and faults, thereby increasing material productivity.
- **Focus particularly on maintenance** – Review maintenance operations to avoid material faults and fatigue with a view to lengthening asset service life.
- **Assign values to materials** – Periodically review materials rendered useless for operation using the hierarchy management and material separation to maintain components with the highest possible value. Pay special attention to stores, stocking areas and off-spec materials.
- **Develop a functional provisioning focus** – Draft the technical specifications required without recommending particular materials, rather their functionality to encourage co-creative innovation with the supply chain.
- **If in doubt, try to imitate nature** – Use biodegradable materials and inexhaustible energy resources.

PROMOTE LOCAL ECOSYSTEMS

- **Encourage new business and investment models** – Analyse new ways of creating value for clients based on dematerialisation and infrastructure as a service.
- **Promote sharing and co-creating**– Increase product usage times by means of shared-use platforms and industrial organisation models as advocated by industrial symbiosis, pursuant to which the by-product of one organisation serves as a resource for another.
- **Explore new uses for complex materials** – Some complex materials (compounds, panels, etc.), after they have served their purpose, prove difficult to reuse and require innovation, as well as industry-backed and third-party agreements to come up with new uses.

RE-NATURALISE DEGRADED SPACES

- **Re-naturalise spaces degraded by operations**– Restore those spaces that have been degraded by economic exploitation to their natural condition by means of waste recovery, landscape restoration and helping to regenerate their ecosystems.

COLLABORATE IN PROMOTING THE CIRCULAR ECONOMY

- **Support circular economy policy development** – Apply and encourage circular economy regulations aimed at enhancing the efficiency of the economy and creating jobs based on circular economy models.
 - **Disclose objectives and be held accountable** – Propose strategies to improve circular economy indicators and make them public to ensure strict compliance with stakeholders' expectations.
 - **Promote the environmental product declaration** in projects to quantify, certify and objectively disclose the impact caused throughout their life cycle.
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