

CIRCULAR ECONOMY POLICY

Purpose

ACCIONA's **Circular Economy Policy** establishes the framework for implementing a circular model of comprehensive resource and waste management. This Policy defines the principles of responsible business conduct that guide the identification, assessment and management of the dependencies, impacts, risks and opportunities related the use of resources and the circular economy.

ACCIONA promotes the transition towards circular economic models that decouple economic growth from the use of virgin resources and the generation of waste. The Organisation contributes to the design and implementation of processes and technologies that continue and maximise the value of resources, eliminate waste and pollution and promote the regeneration of natural systems.

Within this context, ACCIONA's Circular Economy Policy is aligned with the main international agreements and conventions that promote the principles of the circular economy, thereby contributing to the commitments of the Kunming-Montreal Global Biodiversity Framework, the UN Global Compact and achievement of the Sustainable Development Goals (SDGs).

Scope

This policy is available to the public and applies to all ACCIONA companies where it has a majority equity holding, exercises control or is responsible for the management thereof, regardless of the geographic location of those companies, and it applies to all directors and professionals of the Organisation, regardless of their position.

In those companies in which ACCIONA has an equity holding but does not have management responsibility, the Organisation's representatives on the governing and management bodies of those companies will promote the adoption of this policy.

To the extent that ACCIONA has influence, it promotes the adoption of the principles contained in this policy by its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

Corporate policies are intended to be applied transversally across all companies within the group. However, they shall not apply in those companies, jurisdictions, and/or situations where the policies or any of their provisions are incompatible with the applicable local regulatory framework.

Principles

The circular economy Policy is based on the following principles:

- **Regulatory compliance** – ACCIONA rigorously complies with environmental regulations in force, and it promotes and supports the development of new regulatory frameworks and international standards that reinforce more sustainable development models.
- **Prevention of harm** – ACCIONA is committed to preventing and reversing the adverse effects caused by the overexploitation of natural resources, the deficient management of waste from its operations and the associated pollution, even in locations where there is no regulatory framework.

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- **Sustainable supply and use of renewable resources** – ACCIONA promotes sustainable sourcing and the use of renewable materials in all its activities, thereby optimising consumption and encouraging responsible practices throughout its value chain.
- **Positive impact** – ACCIONA, aware of the need to reduce dependence on virgin raw materials and increase the circularity of resources, adopts an approach that goes beyond the mitigation of negative impacts. This approach integrates the use of advanced tools such as Life Cycle Assessment (LCA), eco-design and digitalisation, which allows the optimisation of resources throughout the life cycle of projects, with the aim of generating a positive impact that we call regenerative.
- **Maintain and reuse** – ACCIONA promotes the responsible use of resources with the aim of extending useful life through processes of predictive maintenance and reuse in similar activities. Where feasible, the repair and refurbishment of damaged products is envisaged as a step prior to the replacement of any installation or equipment.
- **Sharing and co-creation** – ACCIONA promotes an increase of product usage times by means of shared-use platforms and industrial organisation models in which the product or by-product of one organisation becomes the resource of another, consequently following the concepts of “Industrial symbiosis” and “Infrastructure as a Service”.
- **Redistribute** – ACCIONA implements actions to redistribute materials and products, both within the scope of its activities and within those of third parties, thereby maximising the use of secondary resources and promoting a sustainable supply in its value chain.
- **Regenerate** – ACCIONA implements renaturalisation actions in the local environments and ecosystems where it operates, thereby promoting the regeneration of natural capital.

Review and approval of the policy

This Policy will be reviewed at least every five years to ensure that it is aligned with the strategic objectives of the Organisation and, in any event, due to legislative and regulatory changes.

The **Circular Economy Policy** forms a part of ACCIONA’s “Policy Book”, which is available on the corporate website and on the Intranet of the Organisation. It is accessible in the main languages¹ of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

¹ Spanish, English, Portuguese, Polish and French.