

DOCUMENT MANAGEMENT AND PRESERVATION POLICY

Statement of intent

ACCIONA, just like the rest of society, is facing an unstoppable process of digitisation and transformation of the channels, times and modes of communication, and it has to rethink how to manage knowledge according to a secure, ubiquitous and multi-channel model in a large number of formats. This change will mean a major revolution in document management.

ACCIONA is preparing this Policy to define the company's Document Management System, which begins with an operating system that, based on paper files and the management of huge quantities of scanned documents, must completely adopt and convert to electronic documents and the paperless office.

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.

The approach to this process considers state and local legislation related to the transformation of administrative procedures in the new e-administration and e-society environment. This means that, among other things, companies must interact electronically with Public Administrations for access to the award of contracts and the performance and decision thereof, and it means that certain directives on the security, conservation and destruction of electronic documents and files must be applied.

Principles

- **Environmental sustainability** – ACCIONA applies the PAPERLESS principles, which require that the consumption and generation of paper must be minimised for reducing the carbon footprint of records derived from the company's activity.
- **Business sustainability (legal risks)** – ACCIONA minimises legal risks in the regions where it is present by intelligently managing the life cycle of digital documents and files over time, and in all the territories and all the businesses in which it operates.
- **Business sustainability (knowledge)** – ACCIONA seeks to maximise the exchange of knowledge among the various organisations of the group, while also focusing on sharing that knowledge between successive generations of employees.
- **Business sustainability (security and cybersecurity)** – ACCIONA is aware that, as a global and highly interconnected company, the accumulation of knowledge has become a maximum priority, wherefore the secure management of that knowledge has to be a mandatory objective.
- **New challenges and working methods** – ACCIONA constantly reviews the processes associated with these activities, for which it refers to the best practices and tools in each sector, and it will certify such practices according to standards of recognised prestige whenever it might be appropriate for the evolution of its businesses.
- **Promotion of adequate management of electronic documents** – ACCIONA takes into account the necessary technical and organisational actions designed to provide standardised processing of all electronic documents, as from the creation thereof until its life cycle is completed, thereby establishing the bases for drafting a Document Retention Standard.