

ENVIRONMENTAL POLICY

Purpose

ACCIONA's **Environmental Policy** establishes the framework for managing the strategy for protecting, preserving and improving the environment. This Policy defines the principles of responsible business conduct that guide the identification, assessment and management of the dependencies, impacts, risks and opportunities related to ecosystems and the components thereof.

ACCIONA deems it essential to comply with the environmental legislation in force in all the countries where it operates, consequently minimising its environmental footprint through the integration of environmental criteria as from the early stages of the planning and design of its projects. Moreover, the Organisation promotes economic growth that respects the limits of the planet.

Within this context, ACCIONA's Environmental Policy is aligned with the main international agreements and conventions on the environment, thereby contributing to the commitments of the Paris Agreement, the Convention on Biological Diversity, 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.

Principles

ACCIONA's Environmental 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 models¹.
- **Prevention of harm** – ACCIONA undertakes to prevent and reverse the adverse effects caused by the pollution or overexploitation of natural resources, among others, due to the development of its operations, even in locations where there is no regulatory framework in this regard. The prevention of harm is focused on:
 - **Protection of land** – ACCIONA undertakes to manage and use land responsibly. ACCIONA promotes the proper management of derived resources and of the waste that could have an impact on land, with the aim of preventing the pollution thereof and preserving the essential ecological functions of land.
 - **Protection of water** – ACCIONA develops solutions that improve the quality, quantity and availability of water, therefore implementing the necessary measures to prevent any form of pollution and to ensure the sustainability of this resource.

¹ The Environmental Policy covers all releases and transfers of pollutants covered by [Regulation \(EC\) No. 166/2006 of the European Parliament and of the Council](#).

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- **Protection of air** – ACCIONA promotes the improvement of air quality and the reduction of greenhouse gas emissions, of noise and light disturbances and of other types of pollutants emitted into the air by encouraging the use of clean energy and applying measures that mitigate their impact on the environment.
- **Positive impact** – ACCIONA, aware of the progressive deterioration of the planet, promotes an approach that goes beyond the mitigation of negative impacts. This approach integrates the entire life cycle of a project, from design to completion, with the aim of generating a positive impact, which we call regenerative.

Due diligence

ACCIONA implements the due diligence process in its operations, which is structured in six stages defined in the Guidelines for Responsible Business Conduct². This process complies with international environmental frameworks, such as the Convention on Biological Diversity, the Paris Agreement, the UN Global Compact and achievement of the Sustainable Development Goals (SDGs).

The mechanisms applied at each stage are the following:

- **Identification and assessment of risks and impacts** – ACCIONA regularly identifies and assesses actual and potential adverse effects on the environment associated with its business activities and commercial relationships. This process covers the short-, medium- and long-term time horizons.
- **Detection mechanisms** – ACCIONA has specific communication and complaint channels, accessible to all its stakeholders, for identifying and responding to any irregularities or breaches of applicable legal regulations or of the Code of Conduct that could occur within the framework of ACCIONA's activities. The Ethical Channel is the instrument that the Organisation makes available to employees, suppliers, customers and collaborators for reporting any irregularity. These channels are freely available and confidential, they offer protection from retaliatory measures and they are culturally appropriate and accessible, both physically and linguistically.
- **Mitigation of adverse effects** – ACCIONA integrates the results of the assessments of adverse environmental effects into management and internal control systems, with the aim of preventing and mitigating the identified actual and potential risks and impacts. These systems are articulated through prevention, mitigation and remediation measures and control activities, all aligned with national regulations and recognised international frameworks.
- **Monitoring and continuous improvement** – ACCIONA regularly reviews its internal processes and the measures that are implemented to prevent and mitigate adverse effects on the environment, thereby ensuring a continuous improvement approach to its practices.
- **Accountability** – ACCIONA publicly discloses all risks and impacts that have been assessed and materialised, both negative and positive, as well as the measures taken to address the negative implications of its activities on the environment. It also reports regularly to the Board of Directors through the Audit and Sustainability Committee.

² Stages: (1) integrate due diligence into policies and management systems; (2) identify and assess adverse effects on human rights and the environment; (3) prevent, interrupt or minimise actual and potential adverse effects on human rights and the environment; (4) monitor and evaluate the effectiveness of measures; (5) communicate; and (6) remedy.

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- **Remediation** – ACCIONA undertakes to establish legitimate and effective mechanisms for remediating adverse impacts on the environment. The Organisation promotes the commitment to provide effective means of redress throughout its entire value chain.
- **Collaboration with authorities** – ACCIONA collaborates actively and fully with the competent authorities and ensures its participation in the necessary processes for the redress of any adverse effects that may have occurred.

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 **Environment 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 languages³ of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.