



INTERNAL CODE OF CONDUCT IN
STOCK MARKETS

ACCIONA, S.A.

AND ITS GROUP OF COMPANIES

Approved by the Acciona, S.A.
Board of Directors 28 July 2016

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1. INTRODUCTION

This Internal Code of Conduct (the “**Internal Code of Conduct**” or the “**Code**”) for Acciona S.A. (“**Acciona**” or the “**Company**”) and its group of companies (“**Grupo Acciona**” or the “**Group**”) in Stock Markets has been approved by the Acciona S.A. Board of Directors in compliance with the provisions of the 6/2023, Securities Market Law of 17 March 2023 (hereinafter, the “**Securities Market Law**” or “**LMV**”), the Regulation (EU) No. 596/2014 of the European Parliament and of the Council, of 16 April 2014, on market abuse (the “**MAR**”) and its implementing legislation.

The Code sets out standards for conduct in order to establish appropriate controls relating to Privileged Information, the preparation or performance of practices which distort free price formation, the performance of treasury stock transactions and the personal trades of the Company’s directors and managers, in order to protect the interests of investors in Acciona and Acciona Group shares.

2. DEFINITIONS

For the purposes of this Internal Code of Conduct, the following definitions are used:

Directors

The members of the Acciona Board of Directors, including the Secretary and, where relevant, the Vice- Secretary of said governing body.

Managers

The persons forming part of the Acciona management committee.

Employees

The area general managers and any other employees of Acciona or of companies in its group who are included within the scope of application of this Code in accordance with article 3.1 (iii).

External Advisers

Those natural persons or legal entities who are not considered employees of Acciona or of companies in its Group, who provide financial, legal, consultancy or any other type of services to Acciona or any of the companies in its Group, via a civil or commercial relationship, on their own behalf or on behalf of someone else and who, as a result of this, have access to Privileged Information.

Confidential Documents

Any documents, regardless of their format, which contain Privileged Information.

Acciona Group

Acciona and its subsidiaries and affiliate companies which are, with respect to it, in any of the situations provided for in article 42 of the Commercial Code.

Privileged Information

Any information of a specific nature which has not been made public and which refers, directly or indirectly, to Acciona or any other company in its Group, or to one or more of the Affected Securities and which, if made public, could appreciably affect the price of the Affected Securities.

It will be considered that the information is specific if it refers to a series of circumstances which occur, or which might be reasonably expected to occur, or to an event which has occurred, or might reasonably be expected to occur, provided that this information is sufficiently specific to allow any conclusion to be drawn on the effects that said circumstances or said event might have

on the prices of the Affected Securities or, where relevant, on the derivative financial instruments related to them.

In this regard, in the case of a process extended over time which is intended to generate or which results in certain circumstances or a specific event, both the future circumstance or event, and the intermediate stages of that process associated with the generation or provocation of that future circumstance or event, may be considered information of a specific nature.

An intermediate stage of a process extended over time will be considered Privileged Information if, in itself, it meets the criteria relating to the Privileged Information referred to in this Code.

Meanwhile, it will be considered that information may have an appreciable influence on the prices of the Affected Securities or, where relevant, on the derivative financial instruments related to them, if it is information which a reasonable investor would probably use as one of the elements in the basic motivation for his/her investment decisions.

Personal Trades

Any transaction carried out on their own behalf by the Affected Persons or, where relevant, the corresponding Related Parties relating to the Affected Securities, which include not only transactions for sale or purchase of the Affected Securities, but also loans, pledges, acquisitions free of charge and transactions carried out in the framework of a life insurance policy materialised in the investment in Affected Securities as provided for in the applicable regulations.

Affected Persons

Those to whom all or part of this Code apply and who are detailed in article 3.1(i) and (iii) of this Code.

Initiated Persons

Persons, including External Advisers who, temporarily, have access to Privileged Information of Acciona or companies in its Group because of their participation or involvement in a transaction, during the time in which they are incorporated in the List of Initiated Persons. Initiated Persons shall cease to be such when the Privileged Information which gave rise to the creation of the List of Initiated Persons is disseminated to the market through the communication required in accordance with the applicable regulations or, in any other case, when notification of such is given by the Unit or, by delegation, the management or area responsible for the transaction.

Related Parties

Those who have one of the following links with the Directors or Managers:

- (i) The spouse of the Director or Manager, or person considered the equivalent of a spouse as defined by national laws.
- (ii) Any children whom the Director or Manager has in his/her care.
- (iii) Any other relatives living with the Director or Manager or who have been in his/her care for at least one year prior to the date on which the existence of such a link must be determined.
- (iv) Any legal entity, trust or association, in which the Director or Manager or the persons indicated in the previous paragraphs have a management position, or which is directly or indirectly controlled by said person, or which has been created for his/her benefit, or whose economic interests are to a great extent equivalent to those of said person.
- (v) Other persons or entities to which this consideration is attributed in the legal provisions valid at any time.

Affected Securities

- (i) Fixed or variable income transferable securities issued by entities in the Acciona Group which are traded on a secondary market or entities participated by and with a significant influence from the Acciona Group on which, either in Spain or overseas, excluding those issued by companies whose securities are traded on a foreign market and which have their own regulations equivalent to this Code.
- (ii) Financial instruments and contracts of any type which grant the right to acquire the securities indicated in (i).
- (iii) Financial instruments and contracts whose underlying securities or instruments are those indicated in (i).
- (iv) For the sole purposes of the code of conduct in article 5 of this code, securities and instruments of entities other than Acciona and those forming part of its Group with regard to which the persons subject to this code have obtained privileged information because of their association with the Acciona Group.

3. SUBJECTIVE SCOPE OF APPLICATION

3.1 Personnel subject to the Internal Code of Conduct

Unless expressly indicated otherwise, this Internal Code of Conduct will apply to:

- (i) Acciona Directors and Managers and Employees of Acciona Group.
- (ii) External Advisers, exclusively for the purposes provided for in article 5.
- (iii) Any other person or group of people included in the scope of application of the Internal Code of Conduct by decision of the Control Unit in light of the circumstances concurring in each case and based on their habitual and recurring access to information which might be considered privileged information.

3.2 List of persons subject to the Internal Code of Conduct

Affected Persons and Related Parties will be included in the corresponding Register of Affected Persons and Related Parties. The Secretary of the Board of Directors, in consultation with the Legal Department, will ensure that the Register of Affected Persons and Related Parties is available at all times to the supervisory authorities. The Secretary of the Board of Directors, as Chairman of the Control Unit, must inform the Affected Persons of their inclusion in the aforementioned register and that they are subject to the Code, and of the infringements and penalties which might arise from the inappropriate use of the Privileged Information and the other points provided for in other concordant legislation. The aforementioned persons must provide proof of receipt and acceptance of the Internal Code of Conduct via automated procedures (such as email or a computer app activated for this purpose) or by completing Appendix I.

In addition, the Directors and Managers must inform their corresponding Related Parties in writing of their obligations deriving from this code and must inform the Control Unit that this notification has been given. They must also inform the Secretary of the Board of Directors or the Control Unit of any subsequent variations, so that this information can be reflected in the aforementioned Register of Affected Persons and Related Parties.

The Register of Affected Persons and Related Parties must be updated immediately in the following cases: **(i)** when there is a change in the reasons and/or details why a person appears in the Register; **(ii)** when it is necessary to add a new person to the register, and **(iii)** when any person is taken off the register.

4. GENERAL PRINCIPLES OF ACTION

4.1 Sending of communications

The Affected Persons and, where relevant, the corresponding Related Parties who have carried out any Personal Trade on their own behalf must formulate a detailed communication addressed to the Secretary of the Acciona Board of Directors or Control Unit and, when required by law, to the National Securities Market Commission (“**CNMV**”), within three working days following the performance of the transaction. The communication must include date, type of transaction, price, number and description of Affected Securities and, where relevant, the identity of the Associated Person who has carried out the transaction. The communication obligation will also include transactions decided with no involvement of the Affected Persons by portfolio managers or legal representatives and must articulate the necessary mechanisms to ensure that the Personal Trades are communicated in time.

The Control Unit will make available to the Affected or Initiated Persons a computer app allowing them to carry out the legally required communications, know the reasons for their inclusion in the list of Affected or Initiated Persons, the blocking periods and any other information related to trading in the Securities Affected. In any case, the Control Unit may require the information supplied to be expanded on.

Acciona may act as representative of the Director or Manager to communicate to the CNMV any Personal Trades which they are obliged to communicate according to the applicable regulations when the interested party requests the Board Secretary or Control Unit to do so.

As an exception to the above, the Control Unit may decide that this communication will not have to be made when, within a calendar year, the total amount of the Personal Trades does not exceed 5,000 euros or a higher amount (not exceeding 20,000 euros) which may be established by the CNMV. The threshold of 5,000 euros will be calculated by adding together all the transactions referred to in this article, although Personal Trades of a different nature, such as purchases and sales, may not be offset against each other.

In the case of Acciona directors, the obligation to communicate the number of Affected Securities in their possession will also apply at the time of their appointment and termination as directors.

The obligation to make the communications referred to in the previous section is understood to be without prejudice to compliance with any other obligation established by the valid regulations.

4.2 Temporary Prohibitions.

The Affected Persons must abstain from carrying out transactions on their own behalf or on behalf of a third party, directly or indirectly, on the Affected Securities in the following periods:

- (i) within a deadline of 30 calendar days prior to the date of publication by Acciona of the corresponding half-yearly or annual financial report or, when applicable, the intermediate management statement.
- (ii) When they have Privileged Information relating to the Affected Securities according to the terms of this code, until they no longer have such a nature.
- (iii) When expressly determined by the Chief Executive or the Control Unit, in order to ensure better compliance with the code of conduct or as required by the circumstances occurring at a certain time.

Without prejudice to articles 5 and 7 of the Code and other applicable regulations, the Control Unit, if it is a question of Managers and Employees, or the Audit and Sustainability Commission if it is a question of Directors, after a written application describing and justifying the transaction by the corresponding Affected Person, may authorise the Affected Persons to carry out Personal Trades, for a limited period of time within the closed period described in sections (i) and (ii) above, in any of the following cases:

- (a) case by case owing to exceptional circumstances, such as the concurrence of serious financial difficulties requiring the immediate sale of Affected Securities;
- (b) transactions as part of, or related to, share incentive plans or pre-emptive subscription rights or free allocation of shares; or
- (c) transactions in which there is no change in the final ownership of the security in question.

The Control Unit will issue a report addressed to the Audit and Sustainability Commission on any authorisations requested.

4.3 Filing of communications

The Secretary of the Acciona Board of Directors, acting through the Control Unit, is obliged to keep any communications, notifications and any other action related to the obligations contained in this Internal Code of Conduct duly filed. The details in said file will be strictly confidential in nature.

5. RULES OF CONDUCT RELATED TO THE PRIVILEGED INFORMATION

5.1 Compliance with Securities Market regulations

The persons subject to this Internal Code of Conduct who are in possession of Privileged Information must comply with the provisions provided for in the applicable regulations and in this Code, and must refrain from carrying out, on their own behalf or on behalf of someone else, directly or indirectly, the conducts indicated in the following section.

5.2 Prohibited activities

The persons subject to this Internal Code of Conduct who are in possession of Privileged Information must refrain from carrying out, on their own behalf or on behalf of someone else, directly or indirectly, the following conducts:

- (i) Acquiring, transferring or selling, on their own behalf or that of third parties, directly or indirectly, the Affected Securities or any other security or financial instrument of any kind which has the Affected Securities as its underlying asset, referred to by this Privileged Information. Also considered a transaction with Privileged Information is the use of this type of information cancelling or modifying an order relating to the Affected Security to which the information refers, when the order has been given before the interested party was aware of the Privileged Information. They must also refrain from merely attempting to carry out any of the previously mentioned transactions. An exception to this is the preparation and carrying out of transactions whose existence, in itself, constitutes the Privileged Information.
- (ii) Communicating said information to third parties, unless this is necessary for him/her to carry out responsibly his/her work, profession, position or functions, and with the requirements provided for in this Code, without prejudice to his/her obligation to communicate and cooperate with the judicial or administrative authorities in the terms

provided for in the Securities Market Law, or in other provisions.

It shall be understood that the Affected Persons are acting in the normal exercise of their work, position or profession when they are communicating information (a) to the Company's governing and management bodies for them to carry out their tasks and responsibilities correctly and; (b) to the company's External Advisers to allow them to carry out correctly the tasks entrusted to them.

In cases where information is disclosed to third parties, the Affected or Initiated Persons making the communication must also inform the Control Unit to ensure that said persons are also included in the corresponding list, if considered necessary.

- (iii) Recommending to third parties the purchase or sale of Affected Securities, or that they get others to purchase or sell them on the basis of said Privileged Information.

For the purposes of the above, unless the CNMV determines that there is no legitimate reason to do so, it shall not be considered that an Affected Person or Initiated Person who possesses Privileged Information has operated with it in the following cases:

- (a) Provided said person carries out a transaction to buy, transfer or sell Affected Securities and this transaction is carried out in good faith to meet an obligation that has become due and not to elude the prohibition on transactions with Privileged Information, and:
 - said obligation derives from an order given or an agreement signed before the Affected Person or Initiated Person in question was aware of the Privileged Information, or
 - the purpose of that transaction is to comply with a legal or regulatory provision prior to the date on which the person in question was aware of the Privileged Information
- (b) In general, those which are carried out in compliance with the applicable regulations.

5.3 Obligation to safeguard the Privileged Information

All the Affected Persons in possession of Privileged Information are obliged to safeguard and adopt the necessary measures to prevent such information being the object of abusive or unfair use and, when required, will immediately take the measures necessary to correct the consequences which may have derived from this, without prejudice to their obligation to communicate and cooperate with the Control Unit and the judicial or administrative authorities in the terms provided for in the Securities Market Law and other applicable legislation.

Meetings of a general nature with analysts, investors or communication media must be planned in advance so that the persons participating in them do not reveal Privileged Information which has not been previously disseminated to the market as indicated in this section.

5.4 Obligation to disseminate

Acciona is obliged to make public and disseminate immediately to the market all Privileged Information, acting with neutrality and applying the same criteria irrespective of whether they may have a favourable or adverse influence on the trading price of the Affected Securities. It must also send the Privileged Information to the CNMV so that it can be included in the official Register regulated in the securities market regulations. Acciona will also publish this information on its website.

The communication to the CNMV must be made at the same time as dissemination by any other

means and as soon as the fact is known, the decision has been adopted or the agreement or contract with third parties in question has been signed. The content of the communication must be truthful, clear, and complete and, when required by the nature of the information, quantified, to avoid confusion or deceit.

In any event, the content and dissemination of the Privileged Information will be adapted to the provisions of the securities markets regulations which apply at any time.

As a general rule, the CNMV must be informed of any communication of the Privileged Information via the authorised interlocutors appointed by Acciona and duly notified to the CNMV, all in accordance with the procedures and requirements set out in the provisions in force.

Acciona may, on its own responsibility, delay the public dissemination of the Privileged Information provided the following conditions are met:

- a) when immediate dissemination may be harmful to Acciona's legitimate interests;
- b) when delay in dissemination cannot lead to the public being confused or deceived;
- c) when Acciona can guarantee the confidentiality of the Privileged Information.

In the case of a process extended over time, which takes place in different stages, with the intention of generating or resulting in certain circumstances or a specific event, Acciona may, on its own responsibility, delay the public dissemination of the Privileged Information relating to this process and its different stages, subject to the terms of letters a), b) and c) above.

Acciona will not deny rumours or information with no basis in reality unless required to do so by the CNMV or if it is necessary to avoid serious situations of information asymmetry which affect the integrity of the market for the Affected Securities.

5.5 Handling of the Privileged Information

During the study or negotiation phases of any transaction which might lead to access to the Privileged Information, the persons who have knowledge of the transaction or internal process because of their position must communicate this confidentially to the Secretary of the Board of Directors of Control Unit, in order to carry out the appropriate legal procedures..

Once this communication has been made, the Control Unit will adopt the following measures:

- (i) Complete, for each transaction or internal process, the corresponding section of the List of Initiated Persons with the format and content, and for the period provided for, respectively, in the applicable regulations. In any event, the Control Unit will draw up the List of Initiated Persons and will keep it up to date in electronic format.
- (ii) Update immediately the List of Initiated Persons:
 - a) when there is a change in the reason for including a person who already appears in the List of Initiated Persons;
 - b) when a new person has to be included in the List of Initiated Persons, because they have access to Privileged Information, and
 - c) when a person ceases to have access to Privileged Information.
- (iii) Keep in computerised format, available to the supervisory authorities, a copy of the details which appear in the List of Initiated Persons for at least 5 years.
- (iv) Inform the Initiated Persons of their inclusion in the List of Initiated Persons and of their

rights and other items provided for in General Data Protection Regulation EU 2016/679 and other concordant regulation; of them being subject to this code; of the privileged nature of the information; of their duty of confidentiality regarding said information; of the prohibition on its use and the infringements and penalties which, where relevant, might derive from the inappropriate use of the Privileged Information; and of their obligation to inform the Control Unit of the identity of any other person to whom they provide the Privileged Information in the normal exercise of their profession or position, so that said persons can also be included in the corresponding section of the List of Initiated Persons.

In the case of External Advisers, they will also be required to sign a confidentiality undertaking, unless because of their professional status they are already subject to the duty of professional secrecy. The List of Initiated Persons, in the case of External Advisers, may be limited to recording the identity of the organisation in question and of the person within it who is responsible for the project, provided that the organisation has confirmed in writing that it will keep a list of persons within it who participate in, or are informed of, the project in the terms provided for in this section.

On their side, the Initiated Persons must:

1. Acknowledge in writing that they are aware of their inclusion in the List of Initiated Persons, of the legal and regulatory obligations deriving from their inclusion in the List of Initiated Persons, and of the penalties applicable to the transactions and unlawful communication of Privileged Information.
2. Restrict knowledge of the Privileged Information strictly to those persons, within or outside the organisation, to whom it is essential to reveal said information and always in the normal exercise of their work, profession or functions; they must also inform the Secretary of the Board of Directors or the Control Unit of the name of said persons, the reason why they have access to the information, and the date on which they have had access to it for the purposes provided for in this article 5.
3. To adopt security measures in relation to the custody, filing, access, reproduction and distribution of the information. The corresponding documentation will be handled in a way that ensures that the filing, reproduction and distribution of the corresponding documents is carried out in a way that guarantees that it is only known by those persons included in the aforementioned List of Initiated Persons.

In any event, the regulations in the code on internal procedures regarding reserved information will apply.

4. Communicate to the Control Unit the existence of indications of abusive or unfair use of the Privileged Information and carry out any instructions given to them by the Control Unit.

5.6 Monitoring of trading prices.

During the study or negotiation phase of any type of legal or financial transaction which might constitute Privileged Information, Acciona's Economic and Financial Management will pay special attention to the price of the Affected Securities and any news which professional diffusers of economic information and the dissemination media might issue and which might affect them.

If there is abnormal fluctuation in the trading price or the traded volume of the Affected Securities, Economic, Financial and Sustainability Management will make the Chairman and

Secretary of the Board of Directors immediately aware of this; the latter, if necessary, and if there are rational indications that said evolution is a result of premature, partial or distorted diffusion of the transaction, will adopt appropriate measures and immediately issue a Privileged Information notice if necessary, providing clear and accurate information on the state of the transaction in progress, or which contains advance notice of the information to be supplied.

6. HANDLING OF TRADING PRICES

The Affected Persons will refrain from preparing or carrying out practices which distort, or attempt to distort, the free formation of prices of the Affected Securities, such as those given below, without prejudice to any others provided for in the applicable regulations:

- (a) Carry out a transaction, give an order for negotiation or any other conduct which: (i) transmits or might transmit false or misleading signals regarding the supply, demand or the price of an Affected Share, or (ii) fixes or might fix at an abnormal or artificial level the price of one or more Affected Securities, unless the person who has carried out the transaction or given the order to negotiate or performed any other conduct can show that this transaction, order or conduct was carried out for legitimate reasons and in compliance with a market practice accepted by the CNMV.
- (b) Carry out a transaction, give an order for negotiation or any other conduct which affects or might affect, via fictitious mechanisms or any other form of deceit or artifice, the price of one or more Affected Securities.
- (c) Disseminate information via communication media, including the internet, or by any other medium, thus transmitting or which may transmit false or misleading signals regarding the supply, the demand or the price of an Affected Security, or which may thus fix at an abnormal or artificial level the price of one or more Affected Securities, including the dissemination of rumours, when the person disseminating them knows or ought to know that the information is false or misleading.
- (d) Transmit false or misleading information or supply false data related to a reference index, when the person disseminating the information or supplying the data knew or ought to have known that they were false or misleading, or any other conduct which supposes a manipulation of the calculation of a reference index.

The following transactions or orders will not be considered included in this article:

- (i) Those which originate in Acciona having carried out programmes to buy back own shares, provided the conditions established by the law for them are met; and
- (ii) In general, any which are carried out in compliance with the applicable regulations.

7. TRANSACTIONS WITH OWN SECURITIES

The following will be considered treasury stock transactions: any transactions carried out by Acciona, either directly or via any of the Group's companies, the purpose of which is Acciona shares, and financial instruments or contracts of any type, whether or not they are traded on the Stock Market or other organised secondary markets, which grant the right to purchase, or whose underlying securities or instruments are Acciona shares.

Treasury stock transactions must always have legitimate purposes such as, amongst other things, giving investors the appropriate liquidity and depth in the trading of Acciona shares, executing programmes to purchase stockholders' equity approved by the Board of Directors or agreements of the General Shareholders' Meeting, meeting previously undertaken lawful commitments or any other permitted purposes in accordance with the applicable regulations.

Under no circumstances may the treasury stock transactions respond to the purpose of intervening in the free process of price formation.

Treasury stock transactions must not be carried out on the basis of privileged information.

The treasury stock must be managed with total transparency in relations with the supervisors and the market regulatory bodies.

In its treasury stock transactions, the Group must meet all the obligations and requirements deriving from the regulations which apply at any time and in cases of discretionary management it must endeavour to adapt to the criteria and recommendations given by the supervisory bodies.

The Economic-Financial and Sustainability Management, as the body in charge of carrying out treasury stock transactions, will perform the following functions:

- a) Manage the treasury stock according to the terms of this article.
- b) Oversee the evolution of Acciona shares in the markets.
- c) Keep a file of all the treasury stock transactions ordered and carried out.
- d) Inform the Control Unit, when requested to do so, on the evolution of the price of Acciona shares, in the markets and on the treasury stock transactions carried out, and also report to the CNMV on said transactions in compliance with the applicable regulations and on the liquidity contract if Acciona has signed one with a member of the market.
- e) Periodically inform the Audit and Sustainability Commission of the transactions carried out.

The Treasury Stock Managers must take on a special confidentiality commitment with regard to treasury stock transactions.

Acciona will select, apart from in certain exceptional and justified cases, a single member of the market to act as intermediary in all its treasury stock transactions.

8. CONTROL UNIT (UCRIC)

The Control Unit will comprise the following members: the Secretary of the Board of Directors who will act as Chairman, the Chief Operating Officer (COO), the Economic-Financial and Sustainability Director (CFSO), the Director of Compliance, the Investor Relations Director and Acciona's Legal Department Director, who will act as secretary. The Unit's chairman may call to its meetings any other Acciona managers or other persons when he/she deems it necessary.

The Unit will ensure that this code is complied with, and its functions will include the following:

- a) Promote knowledge of the Code and of the standards of conduct in relation to the securities market
- b) To respond to any queries and settle any doubts arising from the content, interpretation and application of the Code.
- c) Those explicitly set out in the Code and any others which might be entrusted to it by the Board of Directors, the Chief Executive or the Audit and Sustainability Commission.

9. NON-COMPLIANCE

Failure to comply with the provisions of this Internal Code of Conduct may result in administrative liability, deriving from the Securities Market Law and its implementing legislation, and to criminal and employment liabilities which might be required of the non-complier in each case.

10. MODIFICATION OF THE CODE

This Code will be updated by the Board of Directors whenever required, to adapt its content to the valid legal and regulatory provisions. The Control Unit may, for these purposes, propose any modifications it deems necessary or appropriate.

APPENDIX I Declaration of Conformity

Mr/Mrs _____, born on _____, with NIF [Tax Identification No.] _____, personal address at _____ and contact telephone number _____, in his/her condition as "Affected Person" in compliance with the provisions of article 3 of the Internal Code of Conduct in the Securities Market of ACCIONA, S.A. and its Group of Companies (the "**Code**") states that he/she has received a copy of the Code, explicitly stating that he/she agrees with the code contained therein.

He/She also states that he/she is the owner, either directly or indirectly, of the following Affected Securities:

Affected Securities	Issuer of the Affected Share	Direct Stake	Indirect Stake (*)

(*) Through:

Direct Holder of the Affected Share	Direct Holder's CIF	Stake

The Related Parties in my charge are the following:

Spouse or equivalent person:

Children in my charge:

Relatives living with me:

Companies controlled by me or in which I occupy the position of director or manager:

Name

CIF

The signatory also declares explicitly that he/she has been informed of the following points:

- (i) Of the signatory's duty of compliance with, and subjection to, this Code, and the duties of information and communication set out herein, including the obligation to notify the persons associated with me in writing of their obligation to notify the Control Unit of any Personal Trades (as defined in the Code) they carry out within three days after they have been carried out.
- (ii) That the inappropriate use of the Privileged Information to which they may have access, and non-compliance with the remaining obligations provided for in the Code might constitute a very serious infringement detailed in the Securities Market Law, a serious infringement provided for in article 297 of the aforementioned Law or an offence of abuse of privileged information in the stock market provided for in article 285 of Organic Law 10/1995, of 23 November, of the Criminal Code (the "**Criminal Code**").
- (iii) That the inappropriate use of the Privileged Information, and failure to comply with the remaining obligations provided for in the Code, may be penalised in the form described in the LMV and article 285 of the Criminal Code, with fines, public warnings, dismissal and imprisonment.

In accordance with the provisions of the General Data Protection Regulation - GDPR (Regulation (EU) 2016/679), and other current regulations, we inform you that the personal data that are communicated through this on-line portal or the Control Unit on the occasion of communications made in compliance with the RIC, will be processed by Acciona, S.A., with address in Avenida de la Gran Vía de Hortaleza, 3, 28033, Madrid (Spain), with C.I.F.: A-08001851 and contact e-mail: ucric@acciona.com, for the purpose of complying with and enforcing the provisions of Regulation (EU) No 596/2014 on Market Abuse and other supplementary or substitute legislation. The legitimate basis of the processing is the interest of the Data Controller in fulfilling a legal obligation arising from the Market Abuse regulations. The data required in the online portal or by the Control Unit are mandatory and strictly necessary to comply with the purposes set out in those forms. The data shall be kept for as long as is necessary to fulfil the purpose for which they are collected and, in any event, for as long as the applicable statutory limitation periods.

There are no assignments except those of legal obligation. Acciona, S.A., uses, in order to carry out the stated purposes, the Computershare platform with which it has signed an order contract for processing in compliance with the applicable regulations on data protection. This processing order does not imply any international transfer.

We also inform you that you can exercise your rights of access, rectification, deletion and portability of your data, of limitation and opposition to its processing, before Acciona, S.A., by writing to the Data Protection Department, located in Avenida de la Gran Vía de Hortaleza, 3, 28033 (Madrid), or by sending an email to the following address: protecciondedatos@acciona.com attaching in both cases a copy of the ID or other identification document. Likewise, it may at any time withdraw the consent given in the cases that are applicable, addressing the address above, as well as complain to the Control Authority (Spanish Data Protection Agency www.aepd.es).

With respect to the personal data that the signatory may have provided on other natural persons in the Statement of Conformity, he/she declares that such data are accurate and that he/she has informed said persons of the content of this clause and of their corresponding Data Protection rights. Notwithstanding the above, the Company shall make all its best efforts to act correctly with respect to the processing of the data of such third parties.

In [place], on [day, month, year].

Signed: Mr/Mrs _____