POLICY BOOK

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SUSTAINABILITY POLICIES

SUSTAINABILITY AND INNOVATION

SUSTAINABILITY POLICY

Statement of intent

This document serves as a comprehensive policy framework setting out the principles for other ACCIONA sustainability policies.

ACCIONA's commitment to sustainability focuses on social progress, environmental balance and economic growth.

As a global company, ACCIONA strives to respond to the main challenges facing society by providing renewable energy, infrastructure, water and services. With sustainable development as the focal point of its businesses, the organisation is capable of generating long-term shared value for its different 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.

ACCIONA follows the 10 principles of the United Nations Global Compact on human rights, labour, the environment, and anti-corruption.

ACCIONA’s commitment to sustainability is also reflected in its contribution to meeting the 17 United Nations Sustainable Development Goals.

Principles

- **Agent of change – Through its sustainability strategy, ACCIONA responds to the global challenges and trends that affect its businesses by providing solutions to the main needs of society.**
- **Long term – ACCIONA understands that sustainability is a long-term commitment that reinforces the principle of economic and financial stability.**
- **Ethics - ACCIONA requires that all of its relationships with third parties be conducted with ethical behaviour, honesty, integrity and transparency.**
- **Governance – ACCIONA’s efforts in sustainability are driven and spearheaded by the company’s top-level management.**
- **Integration of sustainability – ACCIONA understands that sustainability must be present in all areas of the business and on every organisational level of the company, all the while transmitting this culture to customers, suppliers, partners, and other stakeholders.**
- **Culture of risk and opportunity management – ACCIONA encourages the inclusion of results from risk and opportunity analyses and assessments when drawing up strategies and making decisions.**
- **Respect for fundamental human rights – ACCIONA respects and contributes to the protection of internationally recognised fundamental human rights making sure it is not complicit in any kind of abuse or violation of those rights.**

SUSTAINABILITY POLICY

- **Creating value for society – ACCIONA strives to bring value to the geographical areas where it operates by developing business models that contribute to local social development and improve people's quality of life.**
- **Caring for the environment – ACCIONA takes a preventive approach to reduce the impact of its operations, seeking the highest level of environmental efficiency in all the projects it undertakes.**
- **Fighting climate change – The fight against climate change is a strategic priority for ACCIONA, generating renewable energy, promoting energy efficiency, mitigating the adverse effects of climate change, and offering coping mechanisms.**
- **Innovation – ACCIONA fosters innovation as one of the pillars of business development, promoting the search for sustainable solutions at a technological and operational level.**
- **Dialogue with stakeholders – Communication and dialogue are the foundation of ACCIONA's relationship with its stakeholders in order to know their needs and meet their expectations.**
- **Transparent communication and accountability – ACCIONA provides its stakeholders with information that is transparent, truthful and accurate.**

Sustainability Committee
April 19, 2018

INNOVATION POLICY

Statement of intent

At ACCIONA, we prioritise innovation as a driving force for change and as something that sets us apart from the rest. Aware that competitiveness, internationalisation, and sustainable development are linked to innovation, ACCIONA commits to continue its efforts in this area, allocating resources and promoting open innovation to come up with cutting-edge solutions and to work to continuously identify both business and technological opportunities in order to create value and strengthen existing businesses.

This approach is put into practice through the strategic values of excellence, innovation, sustainability, and legal compliance.

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

- **Management commitment and promotion – Innovation and research is driven from the highest management level, allocating the financial and human resources necessary to bring it to fruition.**
- **Culture of innovation – A culture of innovation is promoted through communication and by encouraging employees to take part through internal initiatives.**
- **Focus on continuous improvement – ACCIONA directs its efforts to creating value, to growing its businesses, to satisfying its customers, and to contributing to sustainable development.**
- **Seeking opportunities – Through close collaboration between the organisational units for innovation and the business managers, fostering open innovation and using structured knowledge transfer schemes.**
- **Impact monitoring, tracking and analysing results – ACCIONA is constantly monitoring its research and innovation activity using control metrics to ensure compliance with applicable requirements, and has established a process for identifying improvements for subsequent analysis and implementation.**
- **Fostering collaboration and alliances with third parties through strategic agreements and the search for synergies.**
- **Promoting scientific innovation – ACCIONA plays an active role in promoting scientific progress, in everything from the internal communication of its activities to participation in international events with the scientific community.**
- **Protecting Intellectual Property – ACCIONA promotes the protection of industrial and intellectual property, developed as part of its activities in innovation and business.**

Sustainability Committee
April 19, 2018

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SUSTAINABILITY POLICIES

THE ECONOMIC SPHERE AND GOOD GOVERNANCE

GENERAL COMPLIANCE POLICY

Purpose

ACCIONA's General Compliance Policy, in line with the Code of Conduct, is intended to reflect the commitment of ACCIONA, S.A. and its group of companies (hereinafter "ACCIONA" or the "Organisation") to act in accordance with the values of sustainability, transparency, honesty and integrity. This commitment implies not only strict compliance with current legislation in all areas of activity, but also the active promotion of a culture of ethics and compliance throughout the Organisation.

This Policy establishes the general framework of ACCIONA's system of regulatory and ethical compliance, herein defining the principles that guide its responsible conduct. It is therefore aligned with the principles and standards set out in the Universal Declaration of Human Rights, the ILO Tripartite Declaration, the OECD Guidelines for Multinational Enterprises and the UN Global Compact.

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.

Corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

In those entities 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 the principles contained in this Policy.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

Principles

ACCIONA's General Compliance Policy is based on the following principles:

- **Culture of ethics and compliance – ACCIONA acts at all times in accordance with the legislation in force in the countries where it operates and within the framework established by the Code of Conduct, therefore promoting a preventive culture based on the principle of "zero tolerance" for irregular actions and for acts that are unlawful or contrary to the Group's internal and external regulations. This commitment is implemented, among other instruments, through the Crime Prevention and Anti-Corruption Model, which forms part of ACCIONA's compliance system.**
- **Leadership and commitment – ACCIONA has a solid model of governance, supported by bodies and committees with specific competencies in compliance, including crime prevention and anti-corruption. The directors and senior management of the Group's various companies take an active and leading role in consolidating a culture of compliance in their respective spheres of activity.**
- **Integrity in relations with third parties – ACCIONA establishes and maintains its relations with customers, business partners, suppliers, public administrations and other stakeholders on the basis of lawfulness, transparency and professional ethics. The Organisation has due diligence procedures in place for the knowledge, assessment and management of risks that may arise from relations with third parties.**

Implementation at the Organization

In line with its commitment to due diligence, ACCIONA has a Crime Prevention and Anti-Corruption Model (the "MPDyA" or "Model"), which is a fundamental pillar of the Organisation's compliance system. This Model provides a structured framework to identify, prevent, manage and mitigate the ethical and regulatory compliance risks to which the Organisation may be exposed in the course of its activities.

The MPDyA has the following essential elements:

- **Documented information:**
  - Code of Conduct: it records the values and principles that must guide the behaviour of all directors, executives, employees, and third parties with which ACCIONA associates.
  - Corporate Policies: they define the guidelines and commitments that govern the actions of the companies that are comprised in the Group, as well as the actions of their directors, executives and employees.
  - **Internal regulations: they include rules, manuals, instructions, procedures and other internal provisions, whether required by sectoral regulations or developed based on Corporate Policies.**
- **Compliance Function: The Compliance Management is set up as an autonomous area, under the supervision of the Audit and Sustainability Committee, and it reports regularly to the Management Team. This Management area is operationally responsible for the deployment, monitoring, review and continuous improvement of the MPDyA.**
- **Risk-based approach: The design and operation of the MPDyA is based on the identification, assessment and monitoring of the risks to which ACCIONA may be exposed, thereby seeking to detect and preventively mitigate possible breaches of the internal and external regulations to which the Organisation is subject.**
- **Training and communication – ACCIONA promotes appropriate training and communication programmes for the Group's directors, executives and employees, as well as for third parties with whom it has dealings, in order to guarantee knowledge, implementation and application of the MPDYA.**
- **Supervision of the Model – The MPDyA is subject to a continuous process of supervision. The bodies that are responsible for supervising the operation of and compliance with the Model have the necessary resources, authority and independence to exercise their functions effectively, objectively and proactively.**
- **Continuous improvement – The MPDyA is guided by the principle of continuous improvement, therefore integrating best practices in accordance with applicable regulations and the highest standards of integrity and regulatory compliance.**
- **Ethical Channel – ACCIONA has an internal reporting system, called the Ethical Channel, which is available so that any person can communicate any potential irregularities, breaches or misconduct that might occur within the framework of ACCIONA's activities and that could be considered in violation of the legal framework, the Code of Conduct and/or the ethical values of the Group. Communications received through the Ethical Channel will be treated with due confidentiality and will be subject to a rigorous process of analysis in order to ensure an appropriate and proportionate response to the nature of the reported facts.**

Response to breaches

Any breach of this policy may be communicated through ACCIONA's Ethical Channel. Communications received of possible violations will be duly analysed, and if confirmed, the corresponding corrective and disciplinary measures will be adopted, without prejudice to the legal liability that could arise in accordance with the legal system of the country in which the violation has been committed.

GENERAL COMPLIANCE POLICY

Approval of the Policy

The Board of Directors of ACCIONA, S.A. is the body that is responsible for approving the general strategies and policies of the Organisation. In the course of these responsibilities, it approves this General Compliance Policy[1] on 13 November 2025, at the proposal of the Audit and Sustainability Committee. This Policy will enter into force on the day following its approval.

The General Compliance Policy forms a part of ACCIONA "Policy Book", which is available on the corporate website and on the Intranet of the Organisation. It is accessible in the main languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

[1] This General Policy on Compliance replaces the previously named Crime Prevention and Anti-Bribery Policy, approved by the Board of Directors of ACCIONA, S.A., in July 2021.

ANTI-CORRUPTION POLICY

Purpose

ACCIONA's Anti-Corruption Policy, in line with the provisions of the Code of Conduct, seeks to establish the commitment of ACCIONA, S.A. and its group of companies (hereinafter, "ACCIONA" or the "Organisation") to comply with current legislation, therefore applying a policy of "zero tolerance" towards corruption in all the manifestations thereof. This responsibility extends to all persons who are subject to this Policy, who must at all times conduct themselves ethically and in compliance with the applicable legal framework.

As a member of the United Nations Global Compact, ACCIONA publicly supports and respects the fundamental principles against corruption included in the United Nations Convention against Corruption and the use of the Global Compact Reporting Guidance based on Principle 10 on anti-corruption, pledging to work against corruption in all its forms, including extortion and abetting, bribery, conflict of interest, influence peddling, document forgery, money laundering, insider trading and fraud, related to any practice mentioned above.

In line with this commitment, ACCIONA's Anti-Corruption Policy establishes the fundamental principles for preventing and combating any form of corruption in the development of its activities and operations.

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.

Corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

In those entities 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 the principles contained in this Policy.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

Principles

ACCIONA's Anti-corruption Policy is based on the following principles:

- **Zero tolerance for corruption – ACCIONA categorically rejects any form of corruption, whether active or passive, in the public or private sphere, and it acts in accordance with the Organisation's internal regulations and with the legislation in force in the jurisdictions in which it operates.**
- **Culture of integrity – The Organisation's directors and professionals, regardless of their position, and third parties who have dealings with ACCIONA must act in accordance with the ethical principles set out in the Code of Conduct and must comply with applicable anti-corruption regulations, wherefore the following conduct is strictly prohibited:**

- Offering, giving, soliciting or accepting bribes in dealings with public officials or private individuals.
- Offering, giving, soliciting or accepting gifts[2] or hospitality[3] that, in dealings with public officials or with any third party, could affect the impartiality of any of the parties, influence a business decision or lead to the impaired performance of professional duties.
- Offering, giving, soliciting or accepting gifts in cash or the equivalent.
- Offering, delivering, request or accepting facilitation payments to commence or accelerate processes or administrative procedures.
- Making political contributions on behalf of ACCIONA under terms that are not explicitly permitted by the legislation of the country where it is operating and by the internal regulations of the Organisation.
- Obtaining preferential treatment by using sponsorship or donation as a means for obtaining it.
- Establishing business relations with third parties without conducting the minimum due diligence required to know those third parties.

- **Prevention and management of conflicts of interest – A conflict of interest arises when the personal, family, professional or financial interests of members or collaborators of ACCIONA run contrary to the values and goals of the Organisation and may compromise impartiality in decision-making or affect the integrity of operations.**

  ACCIONA values the loyalty of its employees and respects their participation in activities outside those of the Organisation, provided they are carried out in a lawful manner and do not conflict with their duties as ACCIONA's employees. In the event that an actual or potential conflict of interest is identified, the Organisation's directors and professionals must proactively report it to the competent body for assessment and the appropriate action, if necessary.

  The following conduct is strictly prohibited:

  - Using the business relations and contacts obtained within the framework of the professional relationship with ACCIONA to one's own benefit or to that of a third party; and
  - Using inside information related to the Organisation's activity for purposes other than those legally or operationally permitted.

- **Ethical commitment in relations with third parties – ACCIONA maintains relations with customers, business partners, suppliers, Public Administrations and other third parties based on professional ethics, in accordance with the principles contained in this Policy and in the internal regulations that implement it.**

  In this regard, ACCIONA has due diligence procedures for the knowledge, assessment and management of risks that may arise from relations with third parties, and it promotes the application and appropriate dissemination of this Policy and its ethical principles for suppliers, contractors and collaborators of the Organisation.

- **Transparency and accountability – ACCIONA's operations and activities are conducted under strict principles of transparency, integrity of financial and non-financial information and control over reporting.**

  All payments, expenses, transactions and disposals of assets made by ACCIONA are properly recorded and accounted for in accordance with applicable legislation and are a true and fair view of the activities of the Group's companies. Misrepresentation of the Organisation's financial information, as well as any other conduct aimed at concealing improper payments, bribes or other fraudulent practices that violate this Policy and the internal regulations that implement it, is strictly prohibited.

- **Internal control and supervision – ACCIONA has a dedicated Internal Audit Management, whose main function is to provide assurance to the Audit and Sustainability Committee and the Board of Directors regarding the existence, effectiveness and efficiency of adequate internal control systems for the main operating and support processes, thereby supporting the achievement of the Organisation's objectives.**

[2] A material object, service or benefit given or accepted for no direct consideration out of gratitude, appreciation or for the sake of courtesy or for a celebratory purpose or as some other form of acknowledgement.
[3] Courtesy practices considered to be common and acceptable in the sectors in which ACCIONA operates.

Implementation at the Organization

In line with its commitment to due diligence, ACCIONA has a Crime Prevention and Anti-Corruption Model that seeks to foster a culture of ethics and compliance, therefore establishing parameters of conduct, as well as mechanisms to detect, prevent and, where appropriate, mitigate potential risks, including those related to corruption.

The essential elements of this Model are set out in the General Compliance Policy, a document that is available in ACCIONA Policy Book.

Response to breaches

Any breach of this policy may be communicated through ACCIONA's Ethical Channel. Communications received of possible violations will be duly analysed, and if confirmed, the corresponding corrective and disciplinary measures will be adopted, without prejudice to the legal liability that could arise in accordance with the legal system of the country in which the violation has been committed.

ACCIONA will cooperate with public bodies and authorities in the investigation of possible irregular conduct whenever it might affect the Organisation's activities or professionals.

Review and approval of the Policy

The Board of Directors of ACCIONA, S.A. is the body that is responsible for approving the general strategies and policies of the Organisation. In the course of these responsibilities, it approves the update[4] of the Anti-Corruption Policy on 13 November 2025, at the proposal of the Audit and Sustainability Committee. This Policy will enter into force on the day following its approval.

The Anti-Corruption 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 languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

[4] The initial version of this Policy was approved by the Board of Directors of ACCIONA, S.A. on 19 April 2018.

ANTITRUST POLICY

Purpose

ACCIONA's Antitrust Policy, in line with the Code of Conduct, seeks to establish the principles of conduct that must guide ACCIONA, S.A. and its group of companies (hereinafter, "ACCIONA" or the "Organisation") when competing in the market and interacting with third parties. This commitment forms a part of ACCIONA's culture of ethics and compliance, and it reflects the Organisation’s desire to act fairly, honestly and in compliance with applicable laws and regulations in force on free competition in the countries where it operates.

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.

Corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

In those entities 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 the principles contained in this Policy.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

Principles

ACCIONA’s Antitrust Policy is based on the following principles:

- **Zero tolerance for irregular conduct – ACCIONA expressly rejects any conduct that seeks to obtain advantages unfairly or illegally over its competitors, always governing its business activity in accordance with the principles of ethics and integrity.**
- **Adaptation to the local context – ACCIONA's business activity is adapted to the legal and competitive particulars of each market in which it operates. It therefore adopts the necessary measures to ensure compliance with the regulations and principles of competition that are applicable in each jurisdiction.**
- **Merit-based competition – ACCIONA competes honestly in the marketplace, guided by the principles of sustainability, innovation and continuous improvement. The Organisation promotes competition based on professional excellence, respect for its competitors and a firm commitment to offer high value-added, efficient and responsible solutions to its customers.**
- **Fair competition – ACCIONA rejects any practice of unfair competition, such as selling at a loss, diverting customers, spreading false information about a competitor, deception or imitation. It also opposes any conduct that involves using its market position to unfairly harm its competitors or customers.**
- **Rejection of collusive conduct – ACCIONA rejects any agreement between companies, decision by business associations or concerted practice that has the purpose or effect of preventing, restricting or distorting free competition within the market. In particular, it disapproves of conduct aimed at or consisting of price fixing, production limitation, market sharing, the exchange of sensitive commercial information, bid rigging or any attempt to set employment conditions —including salaries— between companies, with the purpose of limiting competition in the labour market.**

Implementation at the Organisation

In line with its commitment to due diligence, ACCIONA has a Crime Prevention and Anti-Corruption Model that seeks to foster a culture of ethics and compliance, therefore establishing parameters of conduct, as well as mechanisms to detect, prevent and, where appropriate, mitigate potential risks related to competition.

The essential elements of this Model are set out in the General Compliance Policy, a document that is available in ACCIONA Policy Book.

Response to breaches

Any breach of this policy may be communicated through ACCIONA's Ethical Channel. Communications received of possible violations will be duly analysed, and if confirmed, the corresponding corrective and disciplinary measures will be adopted, without prejudice to the legal liability that could arise in accordance with the legal system of the country in which the violation has been committed.

ACCIONA will cooperate with public bodies and authorities in the investigation of possible irregular conduct whenever it might affect the Organisation's activities or professionals.

Review and approval of the Policy

The Board of Directors of ACCIONA, S.A. is the body that is responsible for approving the general strategies and policies of the Organisation. In the course of these responsibilities, it approves the update[5] of this Antitrust Policy on 13 November 2025, at the proposal of the Audit and Sustainability Committee. This Policy will enter into force on the day following its approval.

The Antitrust 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 languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders

[5] The initial version of this Policy was approved by the Board of Directors of ACCIONA, S.A. on 19 April 2018.

ETHICAL CHANNEL POLICY

Purpose

The purpose of the Ethical Channel Operating Policy, in line with the provisions of the Code of Conduct, is to establish the essential principles governing the management of communications of the Ethical Channel of ACCIONA, S.A. and its group of companies (hereinafter, "ACCIONA" or the "Organisation"). This Policy also incorporates the procedure for managing communications received through the Ethical Channel.

ACCIONA puts the Ethical Channel at the disposal of anyone who wishes to report to the Code of Conduct Committee any possible and/or potential irregularities, breaches or conduct occurring within the framework of the Organisation's activities that fail to comply with the current legal framework in force, with the Code of Conduct and/or with the Group's ethical values, in line with the applicable regulations in the jurisdictions where the Organisation operates.

The particulars and specifics derived from all local regulations are set out in the Annex to this Policy.

Scope

This Policy is available to the public and applies to all ACCIONA companies where it has a majority equity holding, and 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.

Corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

Entities of the Group that, in view of their legal, regulatory or business particularities, may require their own Ethical Channel[6] must draft them, while guaranteeing compliance with the basic principles contained in this Policy.

In those entities 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 the principles contained in this Policy.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

Principles

ACCIONA’s Ethical Channel Operating Policy is based on the following principles:

- **Accessibility – The Ethical Channel is designed to be accessible to any person wishing to report a possible and/or potential irregularity or non-compliance in accordance with the provisions of this Policy. It is available in several languages to ensure that it is understood by all users, regardless of their location, thereby allowing for fast, clear and secure communications.**

- **Absence of retaliation – Any whistleblower who, in good faith, reports possible and/or potential irregularities may not be sanctioned or be the subject of a negative consequence or any retaliation due to having made a report.**

  This guarantee of absence of retaliation extends to persons associated with the whistleblower, namely (i) natural persons who, within the framework of the organisation where the whistleblower works, might assist the whistleblower in the process; (ii) natural persons who are related to the whistleblower and who could sustain retaliation, such as co-workers or relatives of the whistleblower; and (iii) legal persons for whom the whistleblower works or with whom they have any other relationship in an employment context or in which they have a significant shareholding. Similarly, the prohibition of retaliation will extend to witnesses who cooperate in the investigation of the reported facts.

[6] The subgroup of entities headed by Corporación ACCIONA Energías Renovables, S.A. (together with its subsidiaries, “ACCIONA Energía”) has specific policies and procedures for such purposes.

The following persons are expressly excluded from the whistleblower protection policy when they report or reveal:

- Information included in notices that have been previously declared inadmissible in court.
- Information related to complaints about issues of an interpersonal nature that do not involve a breach and/or that are strictly personal and private between the persons involved.
- Information that is readily available to the public or hearsay.
- Information that is not sufficiently substantiated (e.g. generic or unspecific information).

- **Good faith – Communications must be made in a responsible, honest and well-founded manner. It is strictly prohibited to report false communications or those aimed at manipulating the truth, as well as those referred to information obtained in an unlawful way.**
- **Confidentiality – In general, strict confidentiality of the communications received and of the investigation conducted is guaranteed, so that only those who are directly or indirectly involved in the process of analysis, an eventual investigation or the resolution have access to the content thereof.**

  In particular, the confidentiality of the whistleblower's identity is subject to special protection. The body that is responsible for managing communications and all persons involved in the process – whether as the whistleblower, internal or external investigator, witness, collaborator or in any other role related to the analysis, investigation or implementation of the results – are obliged to keep the identity of the whistleblower and any information obtained within the framework of the communication strictly confidential.

  In the event that any communication is received through a channel other than the Ethical Channel or is addressed to ACCIONA staff who are not authorised for the processing thereof, the person receiving this information will also be subject to said confidentiality obligation and must forward it immediately through the Ethical Channel.

  In order to preserve the identity of the whistleblower and to avoid any potential retaliation, the subjects under investigation (also referred to as "persons affected by the communication") will not have access to the communication or to the data that would allow identifying the whistleblower.

  Notwithstanding the foregoing, the whistleblower's identity may be disclosed to Legal Authorities, the Public Prosecutor or to the competent Administrative Authority during a criminal, disciplinary or sanction-imposing investigation. In this case, the whistleblower will be previously informed, unless this information could jeopardise the investigation or the administrative or judicial procedure.
- **Duty to report and collaborate – All persons subject to the Code of Conduct are obliged to immediately communicate any possible and/or potential irregularities, breaches or behaviour occurring within the framework of the Organisation's activities that fail to comply with the legal framework in force, the Code of Conduct and/or the Group's ethical values, in accordance with applicable regulations (including activities carried out within the framework of a Temporary Joint Venture – "UTE" – or any other form of business association in which ACCIONA entities hold an equity interest). Without prejudice to the preceding, the Annex identifies in more detail the matters that are subject to communication by jurisdiction.**

  All persons subject to the Code of Conduct who are not affected by the communication are obligated to cooperate with the investigation thereof.
- **Due diligence in management – All communications are managed by the Code of Conduct Committee in a rigorous manner that respects the deadlines established by applicable internal and external regulations and by the principles set out in this Policy.**
- **Impartiality and objectivity – The Code of Conduct Committee will ensure that there is no actual or potential conflict of interest in the management of communications.**
- **Respect for the rights of all parties involved – The Code of Conduct Commission will ensure that the fundamental rights of all persons involved are respected.**

- **Respect for anonymity – Anonymous communications may be submitted. Any actions or omissions whose intent is to discover or reveal the whistleblower's identity when they have opted to remain anonymous are expressly prohibited.**

ACCIONA recommends that whistleblowers identify themselves, given that, in general, this facilitates processing of the communication. Nevertheless, if anonymity compromises suitable conduct of the investigation or observance of the procedure and the guarantees thereof, the whistleblower will be informed of this fact, who may decide whether to reveal their identity or keep it confidential. If anonymity is chosen and if it is not possible to obtain the information that would allow continuing with the investigation, the communication may be closed.

- **Accountability and disciplinary scheme – The failure to comply with the provisions of this Policy may result in application of the corresponding disciplinary measures, without prejudice to any legal liability that could arise under the laws of the country in which the violation has been committed.**

Implementation at the Organisation

Body responsible for management of the Ethical Channel

ACCIONA's Code of Conduct Committee ("the Committee") is the body that is responsible for managing the Internal Reporting System, i.e. the Ethical Channel.

The Committee is composed of senior executives with particular relevance in not only organisational matters, but also ethical and compliance issues. The person who acts as Chairman of the Committee has been delegated the powers to manage the Internal Reporting System under the terms set forth in applicable regulations, therefore exercising the duties of this position with independence and sufficient resources.

The Committee reports periodically to the Audit and Sustainability Committee on the functioning of the Ethical Channel, including the number, origin and type of the communications received, the results of investigations and the proposals for action.

The Committee has internal rules of procedure governing its operation.

Procedure for managing communications

- **Ways for submitting communications through the Ethical Channel**

  Communications can be submitted via the Ethical Channel as follows:

  - In writing:
    - Using the Ethical Channel's form, published on the website and on the Intranet: http://canaletico.acciona.com.
    - By post, addressed to the Committee, at: Avenida de la Gran Vía de Hortaleza, 3, 28033 Madrid (Spain).
  - Verbally:
    - By voice message, attaching the file to the Ethical Channel form. In this case, the whistleblower agrees to have their verbal communication recorded and/or transcribed.
    - Through a meeting in person, through videoconference or by telephone with a representative of the Committee, at the request of the whistleblower. Said meeting, regardless of the format (in person, online or by telephone), must be held within a maximum of seven (7) days from the time it was requested. If applicable, the whistleblower will be informed that the communication will be recorded and that their personal data will be processed, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and the Council, of 27 April 2016, and in accordance with the applicable local regulations. All other members of the Committee must be informed that this meeting is being held, unless any of them are subject to a conflict of interest. As long as the proper purpose of the investigation is not compromised, the content of the communication will be transferred to the Ethical Channel for proper recording.

All communications submitted verbally must be documented (i) by recording the conversation in a secure, long-lasting and accessible format or, alternatively (ii) by accurately transcribing the full conversation recorded previously. Without prejudice to the rights to which the whistleblower is entitled, whistleblowers will have the right to check, rectify and accept the conversation’s transcript by signing it, in compliance with the data protection regulations.

Communications may be submitted in the official language of the regions in which ACCIONA operates.

The whistleblower may, in their communication, indicate a residence, an email address or any other secure means for the purpose of receiving notifications. Within a maximum period of seven (7) calendar days as from the receipt of a communication, an acknowledgement of receipt will be sent to the whistleblower through the means indicated by the same.

The Committee may communicate with the whistleblower and request additional information.

- **Admission for processing**

  The Committee will, as soon as possible, examine and evaluate the content of the communications received, consequently d**eciding on:**

  - Preliminary classification. The nature of the communication will be determined, for which the assistance of third party professionals acting as pre-investigators may be sought.
  - Admission for processing. A decision will be made regarding whether it is applicable to open a file and initiate investigation proceedings.
  - When the content of the communication does not fall within the scope of application of the Ethical Channel, it will be closed and, where appropriate, referred to the corresponding channels. Whenever possible, the whistleblower will be informed accordingly. The following may also be grounds for closing the communication:
    - The late submission of the communication.
    - When the circumstances of the whistleblower or of the persons to whom the communication refers and the content of the communication suggest instrumental or improper use of the Channel.
    - The communication of implausible, irrelevant or generic and non-specific facts.
    - When the communication refers to facts that are the object of a previous communication from the same whistleblower and it does not contain any new or significant information that justifies processing.

- **Investigated**

  In the event that the communication is admitted for processing, an investigator will be appointed, while avoiding possible situations of conflict of interest.

  The investigator will arrange for any investigative measures that may be necessary to clear up the facts. These measures may include:

  - Conducting interviews with the whistleblower, with the person affected by the communication and/or with any other person who could be involved;
  - Requesting and collecting any information or documentation deemed necessary, both from persons forming a part of ACCIONA and from third parties;
  - Requesting, according to the criteria of proportionality, the support of external experts to carry out the investigation, who will act under the supervision and coordination of the Committee, and in any case, in accordance with the principles of confidentiality;
  - Access, if applicable, to the computer systems and devices that ACCIONA makes available to its employees (e.g. desktop and laptop computers, storage devices, mobile telephony, etc.), including emails sent or received via corporate email, as long as such access is strictly necessary for investigating the reported facts; is carried out in accordance with the principles of appropriateness, necessity and proportionality; and respects at all times the requirements established in applicable regulations on data protection and fundamental rights; and
  - Any other measures that the investigator deems appropriate for proper investigation of the facts, provided that they are proportionate and comply with applicable regulations.

  If the facts that are the object of the investigation are already being investigated by a competent authority, then the investigator must take this into account when assessing whether it is appropriate to conduct the investigative measures provided for in this section.

- **Rights and obligations of the persons involved in the investigation**
  - Rights and duties of the whistleblower:
    - The whistleblower will have the right to be informed, whenever possible and when the confidentiality of the proceedings is not compromised, about whether or not an investigation is opened as a result of their communication.
    - The whistleblower will have the right to confidentiality regarding their identity and that of any third party mentioned in the communication, as well as regarding the transmitted information.
    - The whistleblower will have the right to protection against retaliation, as long as the communication is made in good faith.
    - The whistleblower will have the right to the appropriate support measures and counselling.
    - The whistleblower will have the right to know the status of the investigation and, whenever possible, the outcome of the investigation.
    - The whistleblower must act in good faith and with reasonable grounds to believe that the information communicated is true at the time of communication.
    - The whistleblower must cooperate in the conduct of the investigation.
    - The whistleblower must diligently consult and respond to the notifications received through the Ethical Channel.
    - The whistleblower must maintain confidentiality about the existence of the investigation and its content.
    - The whistleblower must refrain from destroying or deleting any information and/or documentation that could have a bearing on the object of the investigation.
- **Rights and obligations of the person affected by the communication:**
  - They will have the right to be heard by the investigator, as well as to be concisely informed of the facts under investigation, without in any case revealing information that could identify the whistleblower.
  - They will have the right to be presumed innocent and the right to honour, and their identity and the existence of the proceedings will be safeguarded from anyone not involved in the investigation, thereby guaranteeing the confidentiality of the proceedings.
  - They will have the right to defend themselves and may appear assisted by a lawyer, if they so desire and at their own expense.
  - They will have the right to submit written arguments during the investigation.
  - They will have the right to be informed of the outcome of the investigation whenever it leads to measures that affect them.
  - They must appear before the investigator whenever required to do so, on the understanding that if they do not do so, they waive their right to submit arguments in the course of the investigation.
  - They must maintain confidentiality about the existence and content of the investigation, except in so far as it relates to their legitimate right of defence.
  - They must refrain from any action aimed at identifying the reporting person, as well as from any retaliatory or prejudicial conduct.
  - They must refrain from destroying or deleting any information and/or documentation that could have a bearing on the object of the investigation.
- **Rights and obligations of other persons who collaborate in the investigation:**

  All persons subject to ACCIONA's Code of Conduct have a duty to cooperate with the investigation of communications. In particular, as appropriate under applicable law, such persons will have the following rights and obligations:
  - They will be entitled to receive brief contextual information about the investigation, to the extent that it is appropriate.
  - They must appear before the investigator, if requested to do so, and they must, diligently and in good faith, reply to all requests for information or documentation made by the investigator.

- They must maintain confidentiality about the existence of the investigation, about the persons to whom it relates and about the facts to which it refers.
- They must refrain from destroying or deleting any information and/or documentation that could have a bearing on the object of the investigation.
- They must report to the appropriate authorities whenever required to do so in the context of judicial or administrative proceedings arising from the investigation.

- **Conclusion of the investigation**

  Upon completion of the investigation of the reported facts, the investigator will submit an investigation report to the Committee, which will include the actions undertaken and the conclusions reached.

  The Committee will analyse this report and will, if applicable and after anonymising the relevant personal data, forward it to the area that holds jurisdiction over the matter. This area will assess the information received and, on the basis thereof, will adopt the measures it deems appropriate, which will subsequently be communicated to the Committee.

  Both the whistleblower and the person affected by the communication will be informed, if applicable, about the outcome of the investigation.

- **Delivery Terms**

  As a general rule, investigations will be processed within the period of two (2) months, except in exceptionally complex cases, in which case the investigation may be extended up to a maximum of an additional four (4) months. These deadlines will be adjusted according to applicable local regulations.

  Processing the personal data of communications received through the Ethical Channel

- **Data Controller and Data Protection Officer**

  ACCIONA, S.A., holder of CIF (Tax ID Code) A08001851, address at Avenida de la Gran Vía de Hortaleza, 3, 28033 Madrid (Spain), (contact of the Data Protection Officer at protecciondedatos@acciona.com) and the various entities of ACCIONA in relation to which the facts are communicated and with which the data subjects have a direct relationship will be considered the controllers of the Personal Data arising from use of the internal reporting system (Ethical Channel) and from the processing of investigations in accordance with this Policy and in accordance with the provisions of the regulations on Personal Data protection. The list of ACCIONA entities can be consulted at any time at: https://www.acciona.com/es/accionistas-inversores/informacion-financiera/cuentas-anuales/.

- **Personal Data categories and origin of the data**

  Personal Data processed within the scope of the Ethical Channel will include identification details; contact details; financial, professional and work-related information; and in some cases, sensitive or special category data, as well as any other information derived from the functioning of the Ethical Channel.

  All Personal Data processed within the scope of the Ethical Channel will be provided directly by the persons involved in the communication, such as the whistleblower, the investigated individual(s) or third parties from whom information is requested within the scope of the Ethical Channel.

- **International Transfers**

  Whenever international transfers of data may be required, the information will be transferred in compliance with the guarantees required by applicable data protection regulations.

- **Information regarding the processing of Personal Data (purpose, legal basis and retention periods)**

a) Managing the internal information system and storing data in the system

   Personal Data will be processed with the aim of processing communications and deciding whether these are accepted or not, based on ACCIONA's legal obligations or, if applicable, the public interest, in compliance with the applicable legislation.

Personal Data will only be processed within the communications reception channel over the period of time required to take a decision to accept or reject it and shall not be disclosed to third parties, except when this is required to guarantee proper functioning of the system or to take decisions regarding the acceptance or rejection of a communication.

Once the decision to accept or reject the communication has been made, the Personal Data will be eliminated from the communications reception channel and, in any case, if no decision has been taken within a period of three (3) months after it is recorded. However, limited information may be stored over a longer period of time as evidence of the system's proper functioning.

b) Processing internal investigations and subsequent storage of data

If the communication is accepted, the Personal Data may be processed outside of the communications reception channel by the team that is responsible for conducting the investigation, with the purpose of carrying out the corresponding internal investigation.

Personal Data will be processed for the time that is necessary to conduct the investigation and to comply with applicable legal obligations. Personal Data will only be disclosed to third parties when it is appropriate for conducting an investigation (i.e. to external advisers) or for subsequently adopting the corresponding corrective measures (i.e. to the Human Resources Manager, when disciplinary measures need to be adopted for a worker), or due to the requirement of a court or competent authority.

After completing the investigation, the Personal Data will be stored for the period of time required, with the aim of adopting and executing the corresponding measures. After this period, it will be stored for the maximum period of time required to adopt the necessary legal or contractual measures. If no measures are adopted, the Personal Data will be deleted and locked over a maximum period of three (3) years, except when this information must be stored in compliance with legal or contractual regulations and in accordance with the applicable regulations with regard to the time limit. Data will be stored for a period of no more than ten (10) years.

Exercise of personal data protection rights

Data subjects may contact the Data Protection Officer by sending an email to protecciondedatos@acciona.com to exercise their rights of access, rectification, opposition, erasure, portability, limitation or any other rights established in the regulations and related to the data included in the corresponding file, under the terms established in the applicable laws. When the whistleblower's identification details are not disclosed to persons directly involved in the communication or when third parties exercise their rights of access.

Data subjects can also lodge a complaint with the corresponding Data Protection Authority, in Spain, the Spanish Data Protection Agency (https://www.aepd.es).

Training and dissemination

The content of the Policy will be included in all of ACCIONA's criminal risk prevention training materials, as well as in any additional dissemination actions determined at each moment.

The Ethical Channel Operating 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 languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Approval of the Policy

The Board of Directors of ACCIONA, S.A. is the body that is responsible for approving the general strategies and policies of the Organisation. In the course of these responsibilities, it approves the update[7] of the Operating

[7] This Policy was approved by the Board of Directors of ACCIONA, S.A. on 10 May 2023, after the corresponding consultation with the legal representatives of the employees, and it was subsequently updated on 14 November 2024

Policy of the Ethical Channel on 13 November 2025, at the proposal of the Audit and Sustainability Committee. This Policy will enter into force on the day following its approval.

ETHICAL CHANNEL POLICY

The Ethical Channel Operating 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 languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

ANNEX

The following are the particulars that apply at the local level in accordance with applicable regulations.

Spain:

- **Applicable regulations**

Law 2/2023, of 20 February, on the Protection of Persons who Report Regulatory Violations and the Fight against Corruption (the "Whistleblower Protection Law").

- **Scope of application of the Ethical Channel**

  The Ethical Channel is the preferred and ideal channel for reporting:

  - Violations contemplated in the Whistleblower Protection Law:
    - Acts or conduct that could have criminal implications.
    - Serious or very serious administrative violations.
    - Violations of Labour Law regarding health and safety at work, including any conduct that might or could involve situations of harassment at work and/or sexual harassment.
    - Violations of European Union law in accordance with the provisions of Directive (EU) 2019/1937 of the European Parliament and of the Council.
  - In addition, any other breaches or infractions of ACCIONA's principles and values or internal standards, such as the Code of Conduct, and/or any other type of irregularity that could involve liability for ACCIONA.

Communications that do not fall into the preceding categories are not subject to the protections set out in the Whistleblower Protection Law.

- **Head of the Internal Reporting System**

The governing body of ACCIONA, S.A. designated the Code of Conduct Committee as the Head of the Internal Reporting System, in accordance with the Whistleblower Protection Law.

In accordance with the provisions of Article 8.3 of the Whistleblower Protection Law, the composition of the Code of Conduct Committee will be notified to the Independent Whistleblower Protection Authority or, where appropriate, to the competent authorities or bodies of the autonomous communities in which ACCIONA operates.

- **Ethical Channel and Obligations related to Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT)**

With regard to communications involving ACCIONA entities that are obligated parties for the purposes of Law 10/2010, of 28 April, on the prevention of money laundering and the financing of terrorism, the Code of Conduct Committee must immediately inform the internal control bodies of such entities about any communications that contain possible indications of money laundering or the financing of terrorism. It must also provide any other information that may be necessary for these entities to be able to properly comply with their legal obligations on this matter.

The internal control bodies or technical units of ACCIONA entities that are obligated parties for the purposes of Law 10/2010 on Anti-Money Laundering and Counter-Terrorism Financing must respect the duty of non-disclosure provided for in Article 24 of said Law.

- **External communication channels**

  The Whistleblower Protection Law establishes external channels for reporting breaches to the Independent Authority for the Protection of Whistleblowers and to the competent authorities or bodies in each autonomous community. The whistleblower may also contact the other competent authorities, depending on the nature of the breach in question[8].

- **Eventual communication to the Public Prosecutor's Office**

  In accordance with the provisions of Article 9.2.j) of the Whistleblower Protection Law, "the information must be forwarded to the Public Prosecutor's Office immediately when the facts could be indicative of a crime. If the facts affect the financial interests of the European Union, a referral will be made to the European Public Prosecutor's Office".

  The Code of Conduct Committee will assess the appropriateness of this communication, thereby taking into account the circumstances of the specific case and in coordination with all other applicable regulations, and taking into account the rights and guarantees that may be affected.

[8] Among others, the Spanish National Markets and Competition Commission, the Spanish Tax Agency, the Spanish National Securities Market Commission, the Spanish Data Protection Agency or any other competent authorities, including the European Union's authorities

RISK MANAGEMENT AND CONTROL POLICY

Statement of intent

The ACCIONA Board of Directors drives the process of risk management in order to identify and assess potential events that may affect the Company, to manage them within the accepted tolerance threshold, and provide a reasonable level of assurance regarding target achievement.

The Risk Management and Control Policy aims to guide and direct the set of organisational, strategic, and operational actions that enable the Board of Directors to accurately pinpoint the acceptable level of risk, so that those in charge of the different lines of business can maximise the company's profitability, maintain or increase its assets and equity, and be sure of achieving above certain levels, preventing uncertain and future events from negatively influencing target achievement.

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.

It considers all risks associated to the activities carried out by ACCIONA's lines of business in all parts of the world and applies to all companies in the ACCIONA Group over which it has effective control. Furthermore, it is encouraged that the principles and guidelines on this subject in affiliated companies that do not belong to the Group are consistent with those established in this Risk Management and Control Policy.

Principles

La Política de funcionamiento del Canal Ético de ACCIONA se fundamenta en los siguientes principios:

- **The ACCIONA Group's risk management process framework represents how the group manages risk. The Finance and Risk Division is in charge of drawing up this framework in order to:**
- **Standardise the identification, classification, evaluation, management, and monitoring of the risks that the different divisions are exposed to and the so-called corporate risks that affect the Group as a whole.**
- **Set up integrated reporting to identify and monitor key risks.**
- **Align risk tolerance levels with Group targets so that they can be achieved with controlled volatility and reducing vulnerability under adverse conditions.**
- **Improve risk response decisions protecting the Group's results and reputation.**

All actions aimed at identifying, assessing, prioritising, discussing, reviewing and controlling risks should fall within the Risk Management System and each area and division is responsible for adopting and applying the framework and the policies related to risk management, in compliance with the following principles:

- **Promoting a risk/opportunity culture in Company management through the Risk Management System.**
- **Integration – Including the results of the risk assessment and analysis in the ACCIONA strategy. Risk management is integrated into the main business processes to ensure a more comprehensive analysis when making decision.**
- **Tolerance level – ACCIONA encourages the achievement of business objectives within the accepted risk tolerance level.**

- **Responsibility – Risk management is the responsibility of all ACCIONA Group employees; they must understand the risks within their scope of responsibility and manage them within the established tolerance limits.**
- **Defending interests – Risk management will defend the interests of shareholders, customers, and the Company's other stakeholders**
- **Accountability – Risk management will be responsible and transparently accountable to regulators and the main external agents for the risks posed against the group and its operating units, as well as the functioning of the systems developed to control them.**
- **Compliance – Respect and compliance with internal regulations and current legislation, with a special focus on Corporate Governance, the Code of Ethics, the Zero Tolerance against Corruption Plan, and the Prevention of Criminal Risks.**
- **Commitment – Risk management is committed to sustainable development, identifying, evaluating and managing the environmental, social, and ethical effects of the Group’s activities.**
- **Resource Optimisation, Updating and Management – Risks will be updated and managed by coordinating the flow of information with the lines of business and optimising resources dedicated to this management. Each division is responsible for disclosing the current or potential significant risks at the right time and for ensuring that the risk management information is provided where appropriate.**
- **Periodic review – The ACCIONA Group Audit Committee will carry out a formal risk evaluation annually for each of the divisions and for the Group as a whole.**

Sustainability Committee
April 19, 2018

QUALITY POLICY

Statement of intent

ACCIONA pledges to create value for its stakeholders through excellence in process management, being responsible for overseeing compliance with all applicable requirements (legal or voluntary), and to lead by example in the application of good practices, prioritising the demand for continuous quality improvement in products and services as well as in the different management systems implemented.

This culture of quality and efficiency in operations extends to all divisions and countries where ACCIONA operates.

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

- **Leadership – The Company's senior management takes on the leadership and commitment of managing quality throughout the organisation.**
- **Strategic alignment – The quality objectives set out are in keeping with the Quality Policy, as well as with the Company's mission, vision and strategy.**
- **Risk and opportunity management – The Company manages the risks and opportunities identified in its processes to achieve the expected results, reduce any negative effects and take advantage of opportunities as they arise.**
- **Satisfaction of customers and other stakeholders – ACCIONA listens to its customers and other stakeholders, identifying their needs and expectations and considering them in its activities to offer them products and services that are to their complete satisfaction, and fostering mutually beneficial long-term relationships.**
- **Top quality and safe use of products and services – ACCIONA takes the utmost care in its activities to ensure the quality and reliability of its products and services, enduring safe use for customers and users.**
- **Continuous improvement – The Company encourages innovation and the development of specific projects to improve its processes that allow it to identify best practices and lessons learned, creating a culture that constantly seeks efficiency in operations.**

Sustainability Committee
April 19, 2018

FISCAL POLICY

The Board of Directors of ACCIONA, S.A. (the 'Company') is responsible for creating the Company's general strategies and policies, which contain the guidelines that govern the conduct of the Company and the companies of the Group of which it is the Parent with the meaning established by Law (the 'Group'). The Board has the non-delegable power to approve the Group's fiscal strategy, along with any investments or transactions of special fiscal relevance given their significant amount or their characteristics.

In exercising these responsibilities and within the scope of the Law and the Articles of Association and consistent with the action principles set out in the Code of Conduct, the Board of Directors approves this Corporate Fiscal Policy (the ***'Policy'***).

This Policy includes the content of the ACCIONA Group Fiscal Strategy of 25 November 2015, whose primary objective is to create value for its shareholders as regards the Group's overall taxation, in compliance with the requirements of the Spanish Corporate Enterprises Act and adapting it to the requirements of standard UNE 19602:2019.

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.

PURPOSE

The purpose of this Policy is to implement the Company's fiscal strategy, based on the excellence and commitment to the application of good tax practices, within the scope of the Group's corporate structure and governance.

The Company's fiscal strategy essentially consists of ensuring compliance with applicable tax legislation and ensuring appropriate coordination among the fiscal practices followed by the Group's companies, all within a context of social interest and support for a long-term business strategy to avoid fiscal risks and inefficiencies in making business decisions.

In doing so the Company considers all legitimate interests, including public interests, which come together in its activity. Accordingly, the taxes that the Group pays in the countries and territories in which it operates comprise its main contribution to the support of public charges and, therefore, one of its contributions to society.

This Policy reaffirms the Group's zero tolerance strategy on unlawful activities, prohibiting the intentional perpetration of tax infractions, continuous surveillance using measures aimed at their prevention and detection, maintenance of effective mechanisms for communicating and spreading awareness among employees, and the development of a corporate culture based on compliance with the rules. To implement this Policy, the Group has processes and systems for internal control that allow it to identify the fiscal risks to which it is exposed due to its activity. The goal of this control framework is, on the one hand, to properly demonstrate a type of fiscal behaviour that highlights an organisational culture of respect for the law.

SCOPE OF APPLICATION

This Policy is applicable to all companies of the Group, as well as all investee companies that do not form part of it but are effectively controlled by the Company, within legally established limits.

Without prejudice to the provisions of the above paragraph, listed companies and their subsidiaries that have their own special scope of enhanced autonomy may establish an equivalent policy that should be consistent with the principles of this one. Furthermore and as appropriate, this Policy is also applicable to joint ventures, temporary business alliances and other, equivalent associations when the Company assumes their management.

FISCAL POLICY

ACTION PRINCIPLES

The Policy is governed by the following principles:

a) Compliance with the tax regulations in the various countries and territories in which the Group operates, paying any taxes that may be required pursuant to the legal system.

b) Tax decision-making by Group companies based on a reasonable interpretation of applicable regulations and in close association with the Group's activity.

c) The prevention and decrease of significant fiscal risks, ensuring that taxation is consistent with the structure and location of the activities, human and material resources and the business risks of the Group.

d) The strengthening of a relationship with tax authorities based on respect for the law, loyalty, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to any legitimate controversies that, while respecting the above principles and defending social interest, may be generated with those authorities regarding the interpretation of applicable legislation.

e) Information to administration bodies on the main fiscal implications of the transactions or matters submitted to their approval, when these are a relevant factor in their decision-making process.

f) The concept of the taxes that Group companies pay in the countries and territories in which they operate as the main contribution to the support of public charges and, therefore, as one of their contributions to society.

g) To keep the appropriate internal channels up and running to encourage the communication of potential irregularities.

h) To ensure that the bodies in charge of supervising and monitoring the application of the Policy and the management system for tax compliance have the necessary resources, autonomy, authority and independence to effectively and proactively monitor performance and compliance, without prejudice to the responsibilities of other Company bodies and divisions and, where applicable, administrative and steering bodies of the companies that conduct the Group's businesses.

i) To promote the excellence and efficiency of the management system for tax compliance, with a clear aim toward on-going improvement and compliance with the requirements of this policy and the management system itself.

j) Within the scope of the management system for tax compliance, to ensure the authority and independence of the tax compliance body with respect to the Company's other administration bodies.

GOOD TAX PRACTICES

In application of the foregoing principles, the Group assumes the following good tax practices:

a) To refrain from using contrived structures unrelated to the activities characteristic of the Group for the sole purpose of decreasing its tax burden or to perform transactions with related entities exclusively to erode the tax base or transfer profits to low tax territories.

b) To avoid opaque structures for tax purposes, understood as those aimed at impeding the knowledge by the competent Tax Administrations of the party ultimately liable for the activities or of the ultimate owner of the goods or rights involved.

c) To refrain from incorporating or acquiring companies that reside in countries or territories considered under Spanish legislation as tax havens or any included in the European Union blacklist of non-cooperative tax jurisdictions, with the sole exception of cases in which the Group is obligated to do this in cases of indirect acquisitions in which the company in question is part of a group of companies comprising the target of acquisition.

d) To follow the recommendations of good tax practice codes implemented in the countries in which the Group companies perform their activity, in consideration of the Group's specific requirements and circumstances.

   In Spain the Company has adhered to the Best Tax Practices Code (the **'Code')** since 22 September 2011, approved by the plenary session of the Foro de Grandes Empresas (Large Businesses Forum) established on 10 July 2009 at the behest of the State Tax Administration Agency.

   The ACCIONA Group shares and assumes the recommendations of that Code, which aspires to improve the application of our tax system by increasing legal certainty, reciprocal cooperation based on good faith and legitimate trust between the Tax Agency and companies, and the application of responsible fiscal policies with the knowledge of the Board of Directors.

   Without prejudice to any review of the contents of this Policy by the Company Board of Directors, the development and implementation of the Code will extend to any other good tax practices that may derive from any recommendations that may be included at any given time, even when not expressly contained in this Policy.

   On the other hand, all Australian tax companies and groups adhered to the 'Voluntary Tax Transparency Code' of the ATO (Australian Taxation Office) and agreed to furnish, effective as of the 2016 financial year, an annual report with additional information to any reported in tax returns to advance in the cooperative relationship with the ATO.

   The Group is also committed to compliance with the OECD Guidelines for Multinational Enterprises as regards taxation.

e) To collaborate with competent Tax Administrations on the detection and search for solutions as regards any fraudulent fiscal practices that may take place in the markets in which the Group is present and about which it may become aware.

f) To furnish any tax-relevant information and documents that may be requested by the Tax Administrations in the exercise of their powers, in the shortest period possible and to the appropriate extent.

g) To inform and appropriately discuss any relevant issues of fact with the corresponding Tax Administration agency about which it may become aware to conduct proceedings, as appropriate, and promote agreements and conformities in the course of the investigation proceedings, insofar as reasonably possible and without impairing good business management.

This Policy was approved by the Board of Directors on 4 November 2021.

ARTIFICIAL INTELLIGENCE RESPONSIBLE USE POLICY

PURPOSE

Predictive and Generative Artificial Intelligence (AI) is changing how people work, manage knowledge and create content. Generally speaking, and in accordance with how it is defined in Regulation (EU) 2024/1689 of the European Parliament and of the Council ("EU AI Act" or "EU Artificial Intelligence Regulation"), an AI system means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments.

ACCIONA, S.A. and its group of companies ("ACCIONA" or the "Organisation") holds AI to be an agent of change capable of positively impacting on both business and the environment, enhancing its competitive advantage and driving economic growth in all sectors of society.

ACCIONA undertakes to promote a responsible, ethical and safe use of Artificial Intelligence and to develop and implement it in accordance with current legislation, corporate principles and respecting fundamental rights.

This policy is based on the values and principles that govern Organisation business pursuits as set forth in the ACCIONA Code of Conduct, Regulation (EU) 2024/1689 on Artificial Intelligence (EU AI Act), EU Guidelines on Ethics in Artificial Intelligence, Recommendation of the Council on Artificial Intelligence (OECD), General Data Protection Regulation (GDPR) and the best practices proposed by the major global actors developing this technology.

It seeks to lay down and consolidate ethical and operational principles to guide the design, development, deployment and use AI systems at ACCIONA. Furthermore, it serves as a framework within which to define best practices and criteria to enable the Organisation positions itself as a guarantor of security and regulatory compliance in the use of these solutions while also observing core corporate values.

SCOPE

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

ACCIONA's corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

In those entities in which ACCIONA has an equity holding but has no management responsibility, the Organisation's representatives on their governing and management bodies will promote the adoption of this Policy or, failing this, must create their own one along the lines of this document and that in no way contradicts any of the principles set forth herein.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

The principles contained in this policy apply both to those Artificial Intelligence systems developed in-house and those acquired from or supplied by third parties.

ARTIFICIAL INTELLIGENCE RESPONSIBLE USE POLICY

PRINCIPLES

The policy comprises the following principles:

- **People-centric**

  ACCIONA considers technology in general, and Artificial Intelligence in particular, as a tool at the service of the common good and society as a whole. It holds people's dignity, respect for their fundamental rights and the priority of human criteria as core values that must govern the entire life cycle of these technologies. The Organisation trusts in the sovereignty of human judgement to ensure the oversight, correcting, recalling or qualifying of AI generated outcomes, replies or products.

  Automation must never compromise the development of the basic skills required for people to perform their professional duties. The Organisation shall ensure that the use of Artificial Intelligence boosts critical thinking, professional judgement and problem solving ability, avoiding the use of technological dependencies that may hinder people’s learning, safety and independence.

  Particularly, it is prohibited to make solely automated decisions that may significantly affect or have legal consequences for people, without qualified and verifiable human intervention commensurate with the system risk level.

- **Non-discrimination**

  Artificial Intelligence systems must be fair, accessible and non-discriminatory to avoid generating or exacerbating any unjustifiable harm against people or groups.

  ACCIONA shall ensure that the design, development, procurement, implementation, use and oversight of AI systems will be conducted in keeping with the principles of equality of treatment, equal opportunity and non-discrimination in accordance with its corporate policies and the applicable regulations in these matters wherever it operates.

  Moreover, it will advocate the adopting of the necessary measures to identify, prevent, mitigate and correct biases or undue adverse impacts, whether direct or indirect, throughout the life cycle of the aforementioned systems, ensuring a level of governance, documentation, traceability and human oversight commensurate with the risk level, with respect to its employees, clients and society in general.

- **Protecting information and safeguarding privacy**

  ACCIONA is aware of the fact that under certain circumstances the data used by the AI systems may contain personal, confidential and sensitive information, as well as that which is covered by intellectual property rights. ACCIONA fosters the transparency and explainability of AI systems, providing comprehensible information on its working, intended purpose, limitations and general decision-making criteria commensurate with the level of risk and context of use. People must be made aware when their data may be used to train models, when they are interacting with AI or when the information provided is from an AI tool.

  Actions by ACCIONA to train, retrain, adjust or enhance AI Systems require prior authorisation.

  ACCIONA remains true to its undertaking to respect the right to privacy of individuals and to protect their data when using Artificial Intelligence as well. Accordingly, any AI-related processing of data must be compliant with the General Data Protection Regulation (GDPR) and any applicable local regulation, observing the principles of lawfulness, fairness and transparency, accuracy, purpose and storage limitation, as well as data minimisation.

ARTIFICIAL INTELLIGENCE RESPONSIBLE USE POLICY

- **Environmental responsibility**

  Artificial intelligence can become an ally in the conservation of the planet by improving operating efficiency, speeding up the development of innovative solutions and expanding our capacity to understand and manage complex natural systems.

  ACCIONA is mindful that the development and use of these technologies may not be compatible with achieving the Net Zero goal, the preservation of water and natural resources or the well-being of those communities where it builds data-processing infrastructures and conducts data processing-related activities.

  In this respect, ACCIONA promotes the responsible use of AI-related technology resources by introducing energy efficiency criteria into its processes, optimising the use of AI tools and seeking solutions to reduce the potential impacts caused by data processing centres.

- **Design safety**

  ACCIONA ensures that all AI systems deployed in the Organisation are in keeping with corporate trustworthiness, safety, technical robustness standards and with those benchmark standards that apply to AI (EU AI Act, ISO/IEC 42001, ISO/IEC 23894, European Commission Guidelines for Trustworthy AI, etc.). Whenever AI systems act on the physical world or share workspace with people — robotics, automated or assisted machinery, drones —, personal health and safety will be prioritised.

- **Learning and development tool**

  ACCIONA sees AI as a driver of human talent not as a replacement for it. The deployment of these technologies is guided by the principle of value contribution, thereby promoting the use of automation as a catalyst for the skills of Organisation employees.

  Artificial Intelligence must be used as a tool to collect, preserve and transfer the knowledge generated by the Organisation throughout its history. ACCIONA advocates the development of systems that make it possible to convert accrued experience into a shared, accessible and reusable asset that facilitate learning, innovation and the conservation of the critical skills required for the future success of the Organisation.

- **Responsible and ethical use**

  ACCIONA promotes an ethical and responsible use of AI, encouraging the use of these technologies in keeping with Organisation values, principles and commitments, respecting fundamental rights and observing both the applicable legislation as well as internal company standards.

  ACCIONA shall not develop, deploy nor use AI systems that use practices prohibited under Article 5 of the EU AI Act and the latest version thereof, such as, for example, manipulative or deceptive techniques, with the objective, or the effect of materially distorting the behaviour of persons, that exploit any of the vulnerabilities of a specific group of persons, that conduct scoring practices on the personal situation or social context of persons, or that enable the real-time biometric identification of people except for those situations in which this use is legally authorised, among others.

  Any use of AI systems for professional purposes must be done via the environments, on the devices and in the channels duly put in place and approved by the Organisation. It is expressly prohibited to enter confidential information, personal data, or information protected by intellectual property, trade secrets or any other sensitive information asset related to the Organisation on publicly accessible or unauthorised third-party AI tools. The Organisation will put supervisory and auditing mechanisms in place to ensure the operational control of and responsibility for these systems.

- **Intellectual property protection**

  ACCIONA undertakes to make two-way use of AI: asset protection and respect for third parties. ACCIONA has put in place the guidelines required to ensure that the AI solutions used in its business pursuits do not infringe on third-party intellectual and industrial property rights, patents or licences, advocating as it does a lawful, secure and ethical innovation ecosystem.

  AI generated outputs cannot represent the sole or substantial part of assets requiring protection without significant creative human involvement.

- **Responsible use in communication**

  ACCIONA undertakes to use AI in all of its communication processes responsibly and transparently and in keeping with its corporate values, observing such principles as accuracy, clarity, rigour and respect for privacy, while also ensuring that AI assisted or generated content is subject to the general content approval process.

IMPLEMENTATION IN THE ORGANISATION

Implementation of this policy is led by management, which holds maximum responsibility for Artificial Intelligence matters. Accordingly, management must keep all the requisite procedures, protocols and internal development standards up-to-date to ensure responsible use of AI and proactive management of the risks linked to its use.

The Organisation will keep an updated record of the AI systems deployed in the Group as provided for under the EU AI Act. This record will facilitate compliance with the transparency and traceability obligations imposed by the pertinent authorities.

POLICY APPROVAL

The Board of Directors of ACCIONA, S.A. (the ACCIONA Group parent company) is the body that is responsible for approving the general strategies and policies of the Organisation. Pursuant to these responsibilities, it hereby approves the update of this Policy on 23 July 2026 at the proposal of the Audit and Sustainability Committee. This policy will enter into force on the day following its approval. The Artificial Intelligence Use Policy forms a part of the ACCIONA "Policy Book", which is available on the corporate website and on the Organisation intranet. It is accessible in the main languages of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

This policy will be subject to periodic review to ensure it is in line with regulatory, technological and sector best practices developments.

3

SUSTAINABILITY
POLICIES

THE SOCIAL SPHERE

STAKEHOLDER RELATIONS POLICY

Purpose

ACCIONA's **Stakeholder Relations Policy** seeks to foster a culture of continuous dialogue and sustained long-term commitment with its stakeholders by ensuring their participation in the Organisation's decision-making process.

The Organisation's main stakeholders include its direct staff and those involved in the value chain, together with its trade union representatives, customers and users, local communities, partners, suppliers, contractors, subcontractors, public administrations and regulatory bodies, investors and analysts, the media, associations and civil society organisations, as well as the natural surroundings and environment.

ACCIONA is a signatory to the commitments of the UN Global Compact, and its Stakeholder Relations Policy is aligned with the fundamentals of ACCIONA's Code of Conduct and due diligence process reflected in its Corporate Policies and with the main international agreements and conventions, thereby actively contributing to 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

ACCIONA's Stakeholder Relations Policy is based on the following principles:

- **Identification and prioritisation of stakeholders – ACCIONA identifies and prioritises its stakeholders through regular analyses, thereby ensuring that the commitment with them is aligned with the organisation's strategic objectives. This approach provides an understanding of the profile and needs of stakeholders, which facilitates the appropriate management of impacts and the associated risks, with particular attention to affected local communities and the most vulnerable groups.**
- **Free, prior and informed consultation with indigenous communities – ACCIONA consults and collaborates in good faith with indigenous communities, consequently seeking their free, prior and informed consent in accordance with the Indigenous and Tribal Peoples Convention, No. 169, of the International Labour Organization (ILO).**
- **Participation in the strategy – ACCIONA deems the relationship with its stakeholders to be a fundamental and effective tool, wherefore it promotes their participation in the processes of defining and executing the Organisation's strategy. To this end, it establishes personalised relationships with each stakeholder and implements specific collaboration strategies according to their characteristics and needs.**
- **Communication – ACCIONA offers accessible communication channels to its stakeholders, both in format and language, to facilitate the submission of consultations, suggestions and complaints, and it ensures that all communications are considered and dealt with appropriately. Similarly, ACCIONA provides timely and accurate communication of the results, impacts and action plans derived from its relationship with stakeholders, while guaranteeing transparency and keeping everyone involved duly informed.**

- **Responsibility and non-discrimination – ACCIONA promotes an inclusive approach, adapted to the needs of its stakeholders. The Organisation acts responsibly and guarantees respect for the human rights of all its stakeholders.**
- **Continuous improvement – ACCIONA undertakes to constantly review and improve its stakeholder relations models, consequently adapting to changes and emerging needs in order to ensure sustainable and effective engagement.**
- **Development of skills – ACCIONA facilitates relations with its stakeholders by providing the necessary means and resources to create suitable spaces for interaction. It also supports the development of skills so that stakeholders can actively participate in processes, if required.**

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 **Stakeholder Relations 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 languages[9] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

[9] Spanish, English, Portuguese, Polish and French.

HUMAN RIGHTS POLICY

Purpose

ACCIONA's Human Rights Policy establishes the framework for the protection and promotion of human rights and fundamental freedoms in all of the Organisation's activities. This Policy defines the principles of responsible business conduct that guide the identification, assessment and management of the risks, impacts and opportunities related to human rights throughout the value chain.

ACCIONA deems it a priority to contribute to the protection of human rights, therefore aligning itself with global efforts to prevent any kind of direct or indirect violation of these rights. The Organisation undertakes not to cause, contribute to causing or be associated with human rights violations, which is why it promotes an environment that is respectful of human rights among its staff and in the value chain, in local communities and in society at large.

ACCIONA's Human Rights Policy is aligned with the principles and objectives of the main international agreements and conventions, such as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the UN Global Compact, among others. This includes contributing to 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 is able to exercise 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 Human Rights Policy is based on the following principles:

- **Equal treatment and opportunities – ACCIONA promotes a culture of respect and inclusion, therefore prohibiting discrimination on the grounds of age, race, ethnicity, colour, gender, disability, religion, political opinion, national extraction, social origin, sexual orientation, marital status, education, background or any other status, in line with the Discrimination (Employment and Occupation) Convention, 1958. All employees must be treated fairly and equitably, with equal opportunities. Moreover, the Organisation prohibits and prevents all forms of physical, psychological, moral and/or sexual discrimination and harassment, in accordance with the ILO's Violence and Harassment Convention, 2019.**
- **Freedom of employment, prohibition of forced labour and all forms of modern slavery – ACCIONA recognises the right to freely chosen employment and prohibits forced labour, all forms of modern slavery and human trafficking in accordance with the Forced Labour Convention, 1930, and the Abolition of Forced Labour Convention, 1957. It prohibits any kind of work under threat and ensures that workers do not pay**

undue fees or costs. It respects the freedom of movement of workers and prohibits the retention of identity documents, and it requires that employment agencies comply with these principles. ACCIONA also undertakes to maintain a work environment that is free from exploitation and undertakes to not employ children under the age of 18, strictly prohibiting child labour in accordance with the Minimum Age Convention, 1973 and the Worst Forms of Child Labour Convention, 1999.

- Freedom of association, trade union membership and collective bargaining – ACCIONA respects and promotes freedom of association, unionisation and the effective recognition of the right to collective bargaining in accordance with applicable legislation and the main international reference standards, including the Freedom of Association and Protection of the Right to Organise Convention, 1948; the Right to Organise and Collective Bargaining Convention, 1949; and the Collective Bargaining Convention, 1981. Employees have the right to associate and participate in organisations for the defence of their interests. The Organisation does not interfere in workers' elections, and it guarantees protection against any discriminatory act or reprisal that might undermine the freedom of association. ACCIONA also supports collective bargaining to define working conditions and regulate relations with trade unions.
- Safe and healthy working conditions – ACCIONA promotes a decent, safe and healthy working environment, based on a health and safety management system in accordance with the highest international standards and industry best practices, in line with the Occupational Safety and Health Convention, 1981, and the Promotional Framework for Occupational Safety and Health Convention, 2006. The Organisation promotes a culture of occupational risk prevention as a fundamental pillar to guarantee the health and safety of its employees. Where accommodation is provided for employees, ACCIONA ensures that living conditions are adequate and decent, thereby complying with applicable national and international standards.
- Ethical, fair and equitable employment and recruitment conditions – ACCIONA implements recruitment practices that are ethical, fair and equitable, thereby ensuring that employment conditions are based on uniform criteria for all groups, including equal opportunities and the recognition of professional merit. The Organisation fosters the inclusion of people at risk of social exclusion and people with disabilities, thereby promoting their integration into the labour market. ACCIONA provides decent working conditions and fair and equitable remuneration that enables employees and their families to meet their basic needs by promoting appropriate pay conditions, and promotes equal remuneration for men and women for work of equal value. All working conditions are clearly set out in a written contract, in a language understandable to the worker, and comply with International Conventions of the ILO, with applicable collective bargaining agreements and with legislation in force.
- Privacy and communications – ACCIONA respects the confidentiality and the right to privacy of all persons with whom it interacts, and undertakes to manage information and data in accordance with national and international data protection laws. In addition, the Organisation ensures that its corporate and commercial communications are non-discriminatory and respectful of different cultures, and pays particular attention to not adversely affecting the most vulnerable groups.
- Respect for the communities in which it operates – ACCIONA recognises that its commitment to human rights includes people and communities that may be affected by its activities, and pays special attention to vulnerable groups such as indigenous peoples and minorities. The Organisation respects the right of access to food, water, sanitation, energy, education, health, housing and a clean and healthy environment, as well as the rights to freedom of opinion, expression, thought and religion. ACCIONA undertakes to avoid involuntary resettlements and, whenever this might not be possible, to minimise the impact and provide fair compensation. It also respects the land rights of communities and ensures that indigenous peoples can participate in the decisions that affect them, in accordance with ILO Convention 169 and free, prior and informed consultation.
- Positive contribution to communities – ACCIONA contributes to the economic, social and environmental development of the communities in which it operates, consequently raising living standards by generating employment, providing access to basic services and protecting the environment. Through active listening and close cooperation with local communities, ACCIONA contributes to the achievement of these goals.

Due Diligence

ACCIONA implements the due diligence process in its operations, which is structured in six stages defined in the Guidelines for Responsible Business Conduct[10]. This process complies with the UN Guiding Principles on Business and Human Rights, with the Voluntary Principles on Security and Human Rights and with 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 human rights 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 in the area of human rights. These channels are freely available and confidential, they offer protection from reprisals and they are culturally appropriate and accessible both physically and linguistically, in compliance with Principle 31 of the UN Guiding Principles on Business and Human Rights. The Whistleblowing Channel is the instrument that ACCIONA makes available to employees, suppliers, customers and collaborators for reporting any irregularity or violation related to human rights. In addition, the Organisation establishes early warning mechanisms to address impacts urgently and minimise their magnitude, in collaboration with affected or potentially affected parties.
- **Mitigation of actual and potential adverse impacts on human rights** – ACCIONA establishes internal control systems to prevent and mitigate the identified actual and potential risks and impacts. These systems are articulated through control activities aligned with the principles of responsible business conduct.
- **Monitoring and continuous improvement** – ACCIONA regularly reviews its internal processes and the measures that are implemented to prevent and mitigate adverse effects on human rights, 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 human rights implications of its activities. If serious violations are detected, the company undertakes to report them in a transparent manner. It also reports regularly to the Board of Directors through the Audit and Sustainability Committee.
- **Remediation** – ACCIONA undertakes to establish legitimate and effective mechanisms for the remediation of adverse impacts on human rights. The Organisation promotes the commitment to provide effective means of redress throughout its entire value chain.
- **Collaboration with authorities** – ACCIONA actively and fully collaborates with the competent authorities and ensures its participation in the necessary processes for the redress of any adverse effects that may have occurred.

HUMAN RIGHTS POLICY

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 **Human Rights 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 languages[11] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

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[10] 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

[11] **Spanish, English, Portuguese, Polish and French.**

Board of Directors
7 May 2026

HUMAN RESOURCES AND OCCUPATIONAL HEALTH AND SAFETY POLICY

Statement of intent

- **ACCIONA prioritises ethical conduct and safety as a hallmark and differential value of the company's way of doing things, while committing to the success and professional development of its employees, investing constantly to make sure it has the best talent.**
- **ACCIONA ensures that human rights are upheld (as reflected in the ACCIONA Human Rights Policy) and follows the most advanced principles on the protection of human and occupational rights governed by international bodies, as well as overseeing the safety and welfare of all of its employees.**
- **For ACCIONA, occupational health and safety is a differential element and an indispensable requirement for ensuring the safety of it employees and collaborators.**
- **ACCIONA is aware that it carries out its activities in industries where occupational risks are widely present, which is why it has declared its support for the objectives of the Seoul Declaration on Safety and Health at Work.**

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

- **High ethical standards** – As one of the company's main operating components, ACCIONA encourages ethical values of respect, cooperation, teamwork, and the behavioural guidelines outlined in the Code of Conduct.
- **Respect for people (rejection of forced labour, child labour and lack of freedoms)** – ACCIONA adopts employment practices in line with the conventions of the International Labour Organisation, prohibiting any kind of forced labour. Likewise, ACCIONA fights against child labour through its employment eligibility requirements.
- **Promotion of effective equality** – ACCIONA promotes the hiring of the best professionals, ensuring real equality of opportunities, the recognition of personal skills and professional merit, and rejecting any kind of discrimination on the grounds of age, race, colour, gender, religion, political opinion, national extraction, sexual orientation, social origin or disability.
- **Promotion of fair and competitive working conditions** – ACCIONA offers fair and equitable remuneration, as well as competitive employment conditions. Likewise, it has talent identification and retention plans, as well as development programmes for its professionals that facilitate the acquisition of new knowledge and the development of new skills and competencies. ACCIONA offers appropriate pay conditions that contribute to a decent wage, in accordance with the applicable regulatory framework, collective agreements and the realities of the environments in which it operates.
- **Freedom of association and collective bargaining** – ACCIONA promotes and respects the right to freedom of association and collective bargaining in the workplace in all countries in which it operates through proactive measures at all the legal entities in which it participates, therefore developing mechanisms for detection, control and mitigation of the defined risks, in accordance with applicable legislation, and fostering labour relations based on dialogue, respect and non-retaliation for the legitimate exercise of these rights.
- **Fostering work-life balance** – ACCIONA promotes a balance between the professional and personal lives of its workers by offering flexible mechanisms that promote the well-being of workers and their surroundings in accordance with best practices of the places where it operates.

HUMAN RESOURCES AND OCCUPATIONAL HEALTH AND SAFETY POLICY

- **Integration of the principle of socially responsible recruitment** – ACCIONA has equality, diversity and inclusion plans in all aspects of people management and, specifically, recruitment, which seek to incorporate groups at risk of social exclusion and people with disabilities into the workforce.
- **Value creation** – By promoting the hiring of local workers, preferably within a project's area of influence, ACCIONA seeks to generate added value for the communities in the area of operation.
- **Ensuring the best working conditions for employees** – ACCIONA operates in compliance with laws and regulations governing wages and working hours, therefore respecting all workers' rights established under applicable laws and collective agreements and ensuring a healthy working environment. Likewise, ACCIONA respects the maximum working hours established by law or collective agreement (including overtime) and guarantees the entitlement to paid annual leave, as well as the rest periods and leave to which employees are entitled under the legislation in force in each country.
- **Responsible conduct in collective processes** – In reorganisation, restructuring or collective redundancy processes, ACCIONA will respect the rights to information, consultation, participation and notice established by law or collective agreement, promoting orderly, responsible processes that are respectful of the affected individuals.
- **Continuous improvements in Occupational Health and Safety** – ACCIONA promotes and disseminates its Prevention Management System in its own activities as well as those of partner companies in order to achieve the goal of zero accidents. ACCIONA also provides its employees and partner companies with the necessary training, skills and material resources in the area of occupational risk prevention so that they can perform their jobs safely and without putting their health at risk.
- **Identification and analysis of risks** – To prevent and/or reduce exposure to risks, ACCIONA conducts specific studies of work centres and workspaces as well as of the preventive measures to be applied.
- **Delegation of responsibilities** – ACCIONA provides the means and resources to ensure Health and Safety, and ACCIONA workers are committed to and take responsibility for ensuring their own safety and that of others.
- **Dissemination of best practices** – ACCIONA disseminates information on the risks associated with its work centres and workspaces as well as the preventive and emergency measures to be followed, particularly with regard to suppliers, contractors and collaborators.
- **Promotion of certification –** ACCIONA encourages the certification of all its activities in accordance with the highest Health and Safety standards based on ISO 45001.
- **Promotion of personal health and well-being – ACCIONA** promotes mental health, emotional balance and a healthy working environment through specific policies aimed at encouraging healthy eating habits, physical exercise, the implementation of preventive healthcare plans and the prevention and management of psychosocial risks.

Board of Directors
7 May 2026

SOCIAL ACTION POLICY

Statement of intent

ACCIONA understands that it must take a leading role in contributing to the sustainable development of the communities in the countries where it operates and to help improve the quality of life of the people that live there.

To achieve this goal, ACCIONA seeks to align social collaboration and its business activity, through sustainable medium/long-term projects where it is present, reinforcing the trust between the company and the societies in which it operates and increasing its positive contributions in accordance with the OECD's Guidelines for Multinational Enterprises.

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

- **Consistency between business and community needs – ACCIONA's social activity focuses mainly on issues relating to its business that are in turn essential for development. Therefore, social action is based on the following pillars:**
  - *Basic Energy services*: the essential goal of this is to enable basic access to electricity using residential photovoltaic systems in isolated rural communities in developing countries where there are no plans for providing other forms of access in the medium or long term.
  - *Basic Water services*: to enable access to safe water and sanitation in isolated rural communities, primarily through sustainable self-managed social projects to provide access to safe drinking water, sanitation, and improved cooking facilities.
  - *Promoting Sustainability:* foster, promote and disseminate a sustainable culture for the purpose of creating a more responsible and fair society.
  - *Social investment associated with projects:* actively contribute to driving and improving the socioeconomic system of the communities where ACCIONA operates.
  - *Health, Education and Culture:* the commitment to collaborate with various institutions on the allocation of resources, with the aim of meeting the expectations of their surroundings, thereby benefiting those initiatives that have a greater repercussion on society and that are considered a priority within the scope of health, education and culture.
- **Positive added value – ACCIONA understands that its contribution should be seen as a contribution to the well-being of society. Its actions, which are not necessarily compensatory nor countervailing, go beyond its business obligations.**
- **Medium and long term commitment – ACCIONA's initiatives for social action and community relations, just as with its business activities, are intended to have a lasting effect in the medium and long term.**
- **Collaboration – ACCIONA cooperates with institutions, NGOs, private companies and others, for the effective development of its social actions. Relationships and partnerships with public and private institutions are intended to combine efforts to support the community.**
- **Ethics – ACCIONA seeks ethics and transparency in its collaborations with entities so that they are not used for anything that goes against the applicable law at any given time.**
- **Adaptability – ACCIONA is committed, in every project, to initiatives that flexibly adapt to the local needs and demands of the communities in which it operates.**
- **Employee involvement – Social action initiatives also represent an opportunity to channel solidarity and commitment concerns. This is why ACCIONA encourages its employees to volunteer.**
- **Monitoring measures – The Company monitors the contributions made and measures their impact.**

Sustainability Committee
April 19, 2018

EQUAL OPPORTUNITY AND ACCESSIBILITY POLICY

PURPOSE

The purpose of this policy, in line with the Code of Conduct, is to establish the commitment of ACCIONA, S.A. and its group of companies (hereinafter, "ACCIONA" or the "Organisation") to equal opportunities and accessibility as guiding principles of our organisational culture.

ACCIONA actively promotes a working environment in which all individuals, regardless of their personal or social characteristics, have the same opportunities for development and feel an integral part of a shared project.

We start from the conviction that integrating different perspectives enhances the capacity for innovation, enriches the Organisation and contributes to the progress of society. We recognise that people are the Organisation's most important asset. Therefore, investing in their development, well-being and recognition is a key priority for attracting, retaining and developing talent, thereby generating shared value.

By implementing practices that are aligned with this policy and by promoting committed leadership and accessible and respectful environments, we seek to consolidate a transformative workplace that fully harnesses the potential of each individual and responds to the environments in which we operate.

SCOPE

This Policy is available to the public and applies to all ACCIONA companies where it has a majority equity holding, and 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.

ACCIONA's corporate policies are intended to be applied across the board in all entities of the Group. However, they will not apply in entities, jurisdictions and/or situations in which the policies or any of their provisions are inconsistent with the applicable local regulatory framework.

At 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.

ACCIONA encourages the principles contained in this Policy to serve as a reference for its suppliers, contractors, collaborators, customers, affected communities and other stakeholders.

This policy forms a part of ACCIONA's "Policy Book", which is available on the corporate website and on the Organisation's intranet. It is accessible in the main languages[12] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

[12] Spanish, English, Portuguese, Polish, French and Italian.

EQUAL OPPORTUNITY AND ACCESSIBILITY POLICY

PRINCIPLES

This Policy is based on the following principles:

- **Non-discrimination** – ACCIONA promotes and recognises the contribution of the knowledge, experience, skills and performance of the people who make up the Organisation, irrespective of their personal or social circumstances, such that they are respected and valued, thereby allowing them to reach their full potential. It therefore undertakes to maintain an environment based on respect and dignified treatment, with a zero-tolerance attitude towards harassment in all its forms and towards any other discriminatory practices. Any type of discrimination based on age, race, ethnicity, colour, national extraction, sex, gender, gender identity, sexual orientation, marital status, family responsibilities, disability, sensitive medical conditions, social origin, religion, political opinion, training, background, genetic characteristics, socio-economic condition, employment options or any other condition is unacceptable.
- **Equal opportunities** – ACCIONA promotes equality of treatment and opportunities as an essential principle to ensure that all individuals, regardless of their personal or social characteristics, have access to the same opportunities for participation, development and recognition in the workplace. Along this line, it undertakes to ensure that processes related to selection, performance, remuneration and benefits, training, promotion, internal mobility and other professional development practices are based on objective criteria related to merit, the recognition of one's own aptitudes and alignment with the achievement of objectives, free from discriminatory practices, while guaranteeing equal opportunities and conditions. Likewise, ACCIONA promotes equal remuneration for women and men for work of equal value, in accordance with applicable legislation and its commitments to equality.
- **Universal accessibility** – ACCIONA understands accessibility as a right and a fundamental value for ensuring that every person can develop their professional potential with equal opportunities, autonomy and well-being. The Organisation comprehensively addresses all dimensions of accessibility—physical, sensory and cognitive—to ensure that its workplaces, infrastructures, services and digital tools are usable and understandable by all individuals, therefore applying, from the very outset, the principles of universal design and international standards and local regulations on accessibility. It also promotes personal autonomy by strengthening the mission of building more just, accessible, safe and fully functional environments for all individuals.
- **Culture of belonging** – ACCIONA promotes an organisational culture based on respect and collaboration, in which each person can fully develop their potential, can feel that they are an active part of the shared project and can contribute through their perspective, experience and performance.
- **Leadership and commitment** – ACCIONA promotes leadership styles that are committed to these principles as a driver of innovation, cohesion and value creation. And therefore, through leadership it promotes environments in which every person feels heard, taken into account and able to contribute meaningfully to the achievement of shared objectives.

IMPLEMENTATION AT THE ORGANISATION

ACCIONA integrates the principles set out in this policy into its organisational culture by promoting awareness and the continuous training of its professionals and by fostering environments based on respect, accessibility and collaboration, where talent can develop without barriers.
Communication plays a key role in this commitment. ACCIONA therefore ensures that its messages, both internal and external, use respectful and non-discriminatory language, thereby reflecting the diversity of its workforce and of the communities in which it operates.

Likewise, the Organisation provides specific communication and complaint channels for its stakeholders, and it undertakes to not only offer accurate information on the principles of this policy but also review and improve its internal processes.

For the effective implementation of this policy, ACCIONA has the necessary tools, resources and organisational structure in place to establish accountability mechanisms and to implement, review and monitor compliance with the policy.

EQUAL OPPORTUNITY AND ACCESSIBILITY POLICY

RESPONSE TO BREACHES

Any breach of this policy may be communicated through ACCIONA's Whistleblowing Channel. Communications of possible violations will be duly analysed, and if confirmed, the corresponding corrective and disciplinary measures will be adopted, without prejudice to the legal liability that could arise in accordance with the legal system of the country in which the violation has been committed.

Board of Directors, 7 May 2026

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SUSTAINABILITY POLICIES

THE ENVIRONMENTAL SPHERE

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.

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

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 models[10].**
- **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.

[10] 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

- **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 Conduct[11]. 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.**
- **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.**

[11] 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

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 languages[12] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors

[12] Spanish, English, Portuguese, Polish and French.

November 14, 2024

BIODIVERSITY POLICY

Purpose

ACCIONA's Biodiversity Policy establishes the framework for conservation and protection, within the Organisation's value chain, of the ecosystems and individuals that are present in both marine and terrestrial habitats. 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 the protection and restoration of biodiversity and ecosystems.

ACCIONA actively contributes to the preservation of marine and terrestrial ecosystems. The Organisation promotes the sustainable management and responsible use of natural capital in line with the targets for Net Biodiversity Loss by 2030 and with achieving a Net Positive Biodiversity Gain by 2050.

ACCIONA's Biodiversity Policy is aligned with the main international agreements and conventions on the protection and conservation of biodiversity and ecosystems, thereby contributing to the objectives and targets 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

ACCIONA's Biodiversity 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.**
- **Application of mitigation hierarchy – ACCIONA undertakes to carry out the necessary actions in its operations and projects to ensure compliance with legislation and to reverse Biodiversity Loss. ACCIONA applies the mechanisms for mitigating adverse effects on biodiversity in accordance with the following stages:**
  - **Prevent** – Avoid the adverse effects caused by pollution, the overexploitation of natural resources or poor environmental protection in the development of its operations, even in locations where there is no regulatory framework.
  - **Minimise** – Reduce, to a minimum, the unavoidable impacts that negatively affect species and ecosystems by implementing the necessary corrective measures and by acquiring local resources and certified sustainable resources, among others.

- **Restore** – To the extent possible, recover areas affected by the development of projects or services and rehabilitate degraded areas, thereby providing additionality and preserving the project's ecosystem services.
- **Offset** – Implement offsetting actions where residual impacts cannot be fully mitigated, thereby contributing to the commitment to halt Net Biodiversity Loss by 2030.

- **Conservation and protection of terrestrial and marine ecosystems – ACCIONA identifies critical ecosystems of high conservation value and key biodiversity areas, which allows it to take actions aimed at improving the state of its operating environments, adjacent areas and other zones, while ensuring respect for and the integration of indigenous territories and local communities.**
- **Prevention of deforestation – ACCIONA is firmly committed to Net Zero Deforestation by 2030, consequently ensuring that its activities do not contribute to the loss of natural forests and promoting forest restoration and full compensation for all felled individuals. This commitment is extended to its value chain through sustainable procurement.**
- **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.**
- **Net Biodiversity Gain – ACCIONA promotes the recovery of lost biodiversity, both terrestrial and marine, through the application of nature-based solutions and the development of regenerative infrastructures.**

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 Biodiversity 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 languages[13] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

[13] Spanish, English, Portuguese, Polish and French.

CLIMATE CHANGE POLICY

Purpose

ACCIONA's Climate Change Policy establishes the framework for managing the strategy for transitioning towards cleaner and more efficient practices, thereby driving the Organisation's climate action. 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 both the mitigation of and the adaptation to climate change.

ACCIONA deems it a priority to lead the transition and invest in low-carbon business models, therefore aligning itself with global efforts to limit the increase in the planet's average temperature to 1.5 ºC by 2050. Through its projects, products and services, the Organisation actively contributes to mitigating climate change, therefore promoting an effective reduction of greenhouse gas (GHG) emissions through the production of exclusively renewable energy and the construction of low-carbon infrastructures. ACCIONA also encourages adaptation to climate change, facilitating access to water and to resilient infrastructures.

ACCIONA's Climate Change Policy is aligned with the main international agreements and conventions on mitigation and adaptation, thereby contributing to the commitments of the Paris Agreement, the Kunming-Montreal Global Biodiversity Framework, the UN Global Compact and achievement of the Sustainable Development Goals (SDGs).

Alcance

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

ACCIONA's Climate Change 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, even in locations where there is no regulatory framework.**
- **Prevention of harm – ACCIONA undertakes to avoid, prevent and mitigate the adverse effects caused by its activities through the promotion of renewable energies and clean technologies.**
- **Climate leadership – ACCIONA leads the fight against climate change by developing solutions for decarbonisation of the economy. The Organisation focuses its investments on activities recognised by the European taxonomy of sustainable activities.**

CLIMATE CHANGE POLICY

- **Science-based objectives – ACCIONA establishes science-based emission reduction targets that contribute to the goal defined in the Paris Agreement.**
- **Net Zero – ACCIONA is committed to decarbonising its business model, therefore promoting the exclusive use of 100 % renewable energy sources and optimising energy consumption to meet Net-Zero commitments. ACCIONA likewise prevents and reduces the atmospheric pollution associated with its operations.**
- **Renewable energies – ACCIONA promotes the development and use of renewable energies to generate clean electricity, thereby reducing dependence on fossil fuels and promoting electrification of the economy. It thus actively contributes to the mitigation of climate change.**
- **Resilient infrastructures – ACCIONA promotes the development, operation and maintenance of infrastructures that help society adapt to climate change and the effects thereof.**
- **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.**
- **Engagement mechanisms – ACCIONA is implementing a series of internal mechanisms that facilitate the transition to a decarbonised consumption model. These include:**
  - **Carbon budget** – ACCIONA assigns carbon budgets to its facilities that have significant emissions, therefore establishing an internal price that varies according to the degree to which targets are met.
  - **Decarbonisation Fund** – ACCIONA allocates an annual internal fund to finance specific decarbonisation measures in its projects, thereby promoting specific initiatives to reduce its emissions.
  - **Remuneration for climate targets** – ACCIONA has integrated a decarbonisation strategy across the entire Organisation, which is reflected in the annual variable remuneration, thus providing incentives for meeting climate targets.
  - **Neutralisation** – ACCIONA, on its path towards Net Zero, promotes the development of projects that capture and permanently store carbon in the atmosphere with the ultimate aim of neutralising the remaining emissions in order to achieve its GHG emissions reduction target.
  - **Mitigation beyond the value chain** – ACCIONA invests in mechanisms that contribute to the financing and development of projects that reduce greenhouse gas emissions beyond its value chain.

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 **Climate Change 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 languages[14] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

[14] Spanish, English, Portuguese, Polish and French.

WATER POLICY

Purpose

ACCIONA' **Water Policy** establishes the framework for managing water and marine resources. This Policy defines the principles of responsible business conduct that guide due diligence related to the consumption of, abstraction of and discharges to water.

ACCIONA recognises that water is a limited, irreplaceable and essential natural resource, which therefore requires tools to guarantee its quantity, availability and quality in the long term. The Organisation contributes to universal and equitable access to safe drinking water and sanitation, recognising that water is a fundamental human right, especially in the most vulnerable and water-stressed local communities.

The Organisation's Water Policy is developed on the basis of the main international agreements and conventions that promote the protection and conservation of water, 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 Water 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 undertakes to prevent and avoid adverse effects on the water environment caused by pollution; by the use of chemicals, of substances of concern or of substances of great concern; or by overexploitation of the resource as a result of its operations, even in locations where there is no regulatory framework.**
- **Preservation and conservation – ACCIONA, through its purification and drinking water treatment solutions, actively contributes to the conservation and rehabilitation of water resources, thereby promoting access to clean water and sanitation in the local communities where it operates.**
- **Positive Impact – ACCIONA, aware of the need to increase the quantity and quality of water resources, especially in areas of high water stress, promotes an approach that goes beyond the mitigation of negative impacts. This approach is applied throughout the entire life cycle of projects, with the aim of generating a positive impact that we call regenerative.**

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 **Water 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 languages[15] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

[15] English, Spanish, Portuguese, Polish and French.

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.**

- **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 languages[16] of the countries where ACCIONA operates to facilitate consultation by the main stakeholders.

Board of Directors
November 14, 2024

[16] Spanish, English, Portuguese, Polish and French.

5 OTHER POLICIES

ACCIONA GENERAL COMMUNICATION POLICY

1. GENERAL COMMUNICATION POLICY GENERAL PRINCIPLES

The Board of Directors is responsible for managing and supervising the Acciona general communication policy at the highest level. This policy contains the information and communication procedures for financial, non-financial and corporate information over the channels specified below. Accordingly, it contributes to maximising the dissemination and quality of the information made available to the market, institutional investors and shareholders, as well as to proxy advisors, the markets, the press and public opinion in general, including the information content provided by the web page.

With a view to engaging more fully with its national and foreign shareholders and investors, and to fostering transparency with regard to the information about the Group that is made public, this policy has been established, which is governed by the following general principles:

- **Transparency, truth, immediacy and uniformity in the dissemination of information, so that shareholders and the different stakeholders receive all the legally required financial and non-financial information, and any other that may be considered of use, both clearly and conveniently.**
- **Provide information about those matters that may be needed for them to properly exercise their rights as shareholders, facilitating access to clear and direct channels and lines of communication that will make it possible to clarify any doubts about the information they have been given.**
- **Publish information periodically, conveniently and permanently, thereby keeping shareholders and investors alike up-to-date about the most important Group affairs at any given time over the most effective channels for receiving any such information.**
- **Equal treatment of all shareholders and investors who find themselves in the same position with regard to information, participation and the exercise of their rights as shareholders and investors.**
- **Always mindful of the aforementioned principles of equal and non-discriminatory treatment of all shareholders, Acciona may adapt the information, communication and contact channels used depending on the different recipients and their needs which may, at any given time, be detected for these purposes.**
- **Use a variety of communication instruments and channels that contribute to maximising the dissemination and quality of the information made available to the market, investors and other stakeholders, leveraging the advantages offered by the new technologies, which enable shareholders and other stakeholders to engage more easily and conveniently with Acciona, thus keeping the Company at the forefront of the use of the new communication channels.**

- **Compliance with that which is provided for in legislation, in the Code of Good Governance of Listed Companies and in the Corporate Governance System, and with the principles of cooperation and transparency with the authorities and competent regulatory and administration bodies.**

The aforementioned principles apply to Company communications and information related to its engagement with shareholders and institutional investors in the context of their involvement with the Company, as well as with other stakeholders such as intermediary financial institutions, Company shares' managers and depositories, regulatory and supervisory bodies, rating agencies, information agencies, proxy advisors, etc.

2. GENERAL INFORMATION, COMMUNICATION AND PARTICIPATION CHANNELS

With a view to complying with the aforementioned principles and the proper dissemination of Group information for shareholders and the market in general, Acciona makes the following information, communication, contact and engagement channels available to them:

2.1. Spanish National Securities Market Commission (CNMV) and other bodies.

The first general channel for information about the Company to shareholders, institutional investors and markets in general, is the Spanish National Securities Market Commission (CNMV) and, where appropriate, those channels put in place by other foreign supervisory authorities and bodies, with the dissemination and public character which information sent to these institutions immediately acquires through the Communication of Privileged Information or Relevant Information on its web pages, which is simultaneously posted on the Company corporate web page.

2.2. Press

A With a view to facilitating open and transparent communication with the press, Acciona has a Communications Management Area through which it channels all requests made and questions asked by journalists about company business and development, along with the respective replies.

Acciona provides several phone lines (91 663 06 57/ 31 14/ 07 53) and a mailbox (gabinetedeprensa@acciona.es) for the press. All press releases and assorted material published by the company to facilitate press work can be found on the Acciona corporate web page https://www.acciona.com/es/actualidad/

2.3. ACCIONA Corporate web

The Company web page is another major communication channel used to engage with shareholders, institutional investors and the markets in general (www.acciona.com). Kept permanently updated, the Company channels information over it that may be of interest to shareholders and institutional investors, thereby promoting the immediacy of its publication and enabling subsequent access to ensure that transparency be prioritised as the value that shapes Company relations with the markets and the public in general.

Not only is the information sent to the CNMV and other official bodies, the issuing of which is legally binding, published on the Company web page, but also any additional information deemed appropriate to achieve greater transparency and the widest possible dissemination to its shareholders, institutional investors and the market in general.

With a view to facilitating shareholder and investor queries, the information released by the Company over its web page is simultaneously posted, whenever possible, in both Spanish and English.

Generally speaking, the Acciona corporate web page makes it easier to:

- **Access legal, company, economic-financial documentation, and non-financial information about the Company from the "Shareholders and Investors" section.**
- **In the context of the General Meeting, request information, clarifications and ask questions related to its agenda, view the same live and even, when so provided for by the Board of Directors, attend it virtually.**

- **Learn about the principles, activities and reports, as well as other publications and data on non-financial information in general.**
- **Facilitate press work through the section "Updates" (https://www.acciona.com/updates/), specifically targeting this group, which includes, among other, corporate information, press releases, audiovisual material, etc.; the foregoing with the aim in mind of ensuring that the information passed on by the press to the market is true and as complete as possible.**
- **Consult the composition of and information on Company governance bodies, such as the Board of Directors and Board Committees, as well as the make-up of the Acciona executive team. Access presentations of results and other presentations for analysts and investors.**

Webcasts and conference-calls

Periodic presentations of results and other relevant communications are streamed and broadcast by multi-conference, which enables shareholders, investors and analysts, and anyone who wishes, to access them. Both webcasts and multi-conferences are also available in their recorded versions and can be accessed through the corporate web page.

Moreover, at the start of every financial year, an approval schedule is published for interim annual accounts and financial statements, indicating the dates on which they will be presented to the market, all of which can be accessed through the web page. This schedule also contains the dates of non-financial information events and conferences.

People who link in to the multi-conference also have the possibility of asking questions to speakers or Group representatives.

The access link to these webcasts to present results is published beforehand on the CNMV web page indicating the date, time and how to access the presentation.

2.4. Social media

Aware as it is of the impact of the new information technologies and communication channels over the internet, the Company encourages an active presence on social media (such as Twitter, Instagram, Facebook, LinkedIn, Slideshare and YouTube) where, without prejudice to its legal obligations, it endeavours to disseminate information of interest regarding how the Company is doing and Group activities, while at the same time smoothly and beneficially engaging with shareholders and other stakeholders in the habit of resorting to these media to keep up-to-date with matters of interest.

When providing privileged information over the social media, the Company will ensure that communications are governed by the following basic parameters:

- Integrity: the Company will make sure that the character limits on certain social media do not affect the integrity of the communication, informing concisely and in a readily understood manner.
- Clarity: the message published on social networks will be objective and accurate, avoiding the use of superlative terms that involve needless subjectivity. Moreover, the "Privileged Information" tag must be used, clearly separating it from any marketing communication.
- Global access: non-discriminatory access must be ensured, as must its free-of-charge dissemination, for a wide public in the European Union. In this regard, it should be emphasised that the social network used must be extensively present in the European Union.
- Interactivity: the very nature of the social media provides a degree of interactivity with users that is wanting in other media. Accordingly, the Company must make sure that the use of any other simulcast medium or channel, whether additional or complementary to the communication covered in point 2.1, to communicate privileged or other regulated information, cannot be used to extend or qualify the original information sent to the CNMV altering in this way its meaning or scope, as well as the replies of the informant or issuer on the information medium or channel.

Furthermore, the Company seeks to have General Shareholders' Meetings disseminated, either wholly or in part, over the social media, to which end it may publish the main headlines from the event in real time, upload photos and/or videos of the live event onto Company channels and share the presentations on an internet web page.

Notwithstanding the foregoing, Acciona employees must be particularly careful with respect to public appearances, making sure to have the requisite authorisations to take part in events with a press or social media presence, to publish and share opinions, to participate in professional conferences or seminars, and in any other situation that may be publicly broadcast or disseminated, whenever they are participating as company employees. Acciona employees must likewise ensure proper coordination with their hierarchical superior and, where appropriate, with the Communication and Investor Relations Area to provide full and complete information. They must always make responsible, respectful and precise statements, following the guidelines established by the Communication and Investor Relations Area, while also respecting the confidentiality of Company information and that of its clients.

2.5. Distribution lists

The Investor Relations Department distributes the interim financial results and both the privileged and relevant information it deems to be of the greatest interest for the market, immediately after its publication in the CNMV, to all those persons who so request it by email.

To ensure the issuing of news that may potentially contain privileged information for the market both transparently and efficiently and in accordance with Royal Legislative Decree 4/2015 of 23 October adopting the consolidated text of the Securities Market Act, Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse, CNMV guidelines with regard to the same and the Internal Code of Conduct in connection with the Securities Markets, the Company has established a privileged information and relevant information management and communication protocol setting out guidelines for the Group as regards the classification, management and publication of Privileged Information and Other Relevant Information.

In this regard, it is established as a general rule for the Group that the information contained in a privileged information or relevant information communication may not be made public through any other medium without first having been communicated to the CNMV.

Shareholders, institutional investors and markets can be informed, regardless of the foregoing, of information generated in the Company through any medium that abides by this General Communication Policy as long as there is no doubt that the information in question does not have to be communicated to the CNMV as privileged or relevant information by law or under the privileged information and relevant information management and communication protocol, or when, having consulted the Company General Secretariat or the Internal Conduct Regulation Compliance Unit, the latter has determined that, in accordance with the rules laid down in the above paragraph, there is no obligation to send a particular communication to the CNMV.

3. SHAREHOLDER AND INVESTOR RELATIONS DEPARTMENT

To facilitate open and transparent communication with shareholders, a permanent Shareholder Office has been opened through which all information requests, clarifications and queries and their corresponding replies are channelled.

To personally attend to shareholder queries, Acciona has established a phone line (+34 916231059) and mailbox (inversores@acciona.es), likewise available over the web page, www.acciona.com where contact persons for this department can also be found.

Conferences and meetings

ACCIONA has a specific department for Shareholder and Investor Relations, which undertakes responsibility globally for coordinating, analysing and managing relations and contact with shareholders and investors. Accordingly this is the permanent and natural channel for communication and liaison between Acciona, its shareholders and investors and the market in general.

Through this Shareholder and Investor Relations Department, the Group will coordinate the communication of the different subsidiaries with the market to ensure that the information provided is appropriate, consistent and coherent at all times.

The Shareholder and Investor Relations Department will be able to count on, whenever necessary, the collaboration of those organisation employees that may be required or it is advisable be present to facilitate communication and attend to the information requirements that arise at any given time.

In the performance of its functions, the Shareholder and Investor Relations Department will obtain the information to be communicated to the market from the different areas throughout the Group responsible for its preparation, thus making it possible to ensure the consistency and uniformity of the same.

The principles and channels contained in this policy govern, where applicable, relations with other stakeholders, such as financial analysts, Bank shares' managers and depositories and proxy advisors, among others.

This policy will not apply to the dissemination of privileged or relevant information and relations with the press, which will be regulated by their own internal rules.

4. GENERAL SHAREHOLDERS' MEETING

The Board of Directors encourages the informed and responsible participation of shareholders at the General Shareholders' Meeting and adopts, through its web page and other media, those measures and guarantees considered appropriate to facilitate the effective exercise by the General Shareholders' Meeting of its functions under the law and in accordance with the Company corporate governance system.

Acciona shareholders are called at least once a year to take part in the General Shareholders' Meeting at which the Company puts in place all types of media to facilitate their participation in the same (e.g. remote voting by email or over the corporate web page, or when established by the Board of Directors, by means of virtual attendance at the Meeting).

Likewise, when holding General Shareholders' Meetings, Acciona makes all the necessary information available to its shareholders to express their opinion on the matters raised for consideration by publishing this information sufficiently in advance and to the level of detail not only required by law but also by the best, national and international governance practices.

Acciona also enables the Shareholders Electronic Forum on its web page for General Shareholders' Meetings to which shareholders have access to facilitate communication prior to the holding of the meeting.

The General Shareholders' Meeting is broadcast live over the corporate web page when so established by the Board of Directors. It can be attended virtually from the link provided by the Company in the "Shareholders and Investors" section on its web page.

These measures seek to create an open environment that will facilitate the participation of shareholders in the General Shareholders' Meeting and the exercise of their rights that correspond to them as such.

In addition to the aforementioned channels, an information forwarding service is provided upon user's request to learn, in real time, about the latest news published on the corporate web page with respect to financial reports, privileged and relevant information communications and those made to the CNMV, or economic-financial and non-financial information presentations.

BOARD OF DIRECTORS COMPOSITION POLICY

1. **PURPOSE AND SCOPE OF APPLICATION.**

2. **NUMBER OF BOARD MEMBERS, SELECTION OF CANDIDATES AND MEMBER RE-ELECTION.**

3. **INCOMPATIBILIITIES.**

4. **GENDER DIVERSITY AS A SPECIAL GOAL.**

5. **COMPLIANCE SUPERVISION.**

1. PURPOSE AND SCOPE OF APPLICATION

Recommendation 14 of the Code of Good Governance of Listed Companies adopted by the Spanish National Securities Market Commission and Article 11.5 of the Rules governing the Board of Directors advise that Boards of Directors adopt a specific and verifiable policy to advocate the fitting composition of the Board; one that ensures that the proposed appointments or re-election of members be based on a prior analysis of the skills required and Board of Director needs and promotes a composition marked by its diversity of knowledge, experience, age and gender.

Gender diversity will be driven by the measures that foster a significant number of female senior executives within the company.

This policy constitutes one of these measures.

Accordingly, the Board of Directors Composition Policy will apply to the election and re-election of Board of Director candidates and will, likewise, apply to the appointment of the Board Secretary and Vice-Secretary.

2. NUMBER OF BOARD MEMBERS, SELECTION OF CANDIDATES AND MEMBER RE-ELECTION.

The number of board members will be determined by the General Meeting either expressly or implicitly on appointing members within the limits marked by the Articles of Association.

The Board of Directors considers that the ideal number of members is from ten to fifteen for optimum collective body effectiveness.

The exact number of members that the Board of Directors will propose to the General Meeting will be that which, according to the shareholders, Acciona business pursuits, and those of its Group, along with any other particular circumstances that hold at a given moment in time, can be considered as the most appropriate to represent the shareholders and ensure maximum governing body effectiveness.

The Board of Directors is responsible for proposing member appointments or re-election at the General Shareholders' Meeting, save for those cases in which the Board co-opts to fill a vacancy provisionally or appointments by shareholders in the exercise of their right to proportional representation.

Member appointment or re-election proposals that are submitted by the Board of Directors to the General Meeting, as well as provisional co-opted appointments, will be approved by the Board at the proposal of the Appointments and Remuneration Committee, in the case of independent board members, and based on a prior report by the said committee in the case of all other board members in accordance with the criteria that must be followed to form the Board of Directors and their required competencies.

The Appointments and Remuneration Committee will assess the suitability of each candidate depending on the competencies, knowledge and experience required by the Board and taking into consideration its diversity in terms of composition, origin, nationalities, age, disability and gender and will define, on the said basis, the functions and abilities required by the candidates to cover each vacancy, and the time and dedication needed to perform the duties involved, including, where appropriate, their participation in specialist committees, and a description of the reasons substantiating the suitability of the candidate. The Committee will assess each candidate regardless of the category to be assigned the prospective board member and person who has proposed him or her.

The Committee may be supported by consultancy firms of a certain prestige when it comes to selecting members internationally, which will conduct a search for potential candidates that fit in with the profile defined in each case by the Appointments and Remuneration Committee.

Moreover, the Committee will endeavour that the independent member positions are filled by persons of acknowledged expertise, competence and experience and who are willing to devote sufficient time to the performance of their duties. The highest of ethical standards will be required, while also taking into account the professional record of the candidate. Those candidates whose record fails to meet the suitability called for will be rejected.

Any member can suggest that potential candidates be taken into consideration by the Appointments and Remuneration Committee to cover vacancies on the Board, should it feel that they are suitable and meet the conditions set forth herein.

The Appointments and Remuneration Committee will also make recommendations to the Board of Directors as regards proposals to re-elect members. In its recommendation, the Appointments and Remuneration Committee will assess the quality of the work done and dedication to the position during the member's mandate, as well as his or her capacity to continue satisfactorily filling the position.

To be able to properly conduct its supervisory and control functions, the Board of Directors understands that its members must combine sufficient capabilities and competencies, among others, in the following areas:

a) knowledge of the sectors in which the Company pursues its corporate activities;

b) experience in and knowledge of economic, financial and non-financial matters, of the management of highly qualified human resources and of regulatory and standard frameworks;

c) international experience; and

d) experience in and knowledge of management, leadership and business strategy.

Accordingly, the professional profile of the members whose appointment and/or re-election is submitted for approval to the General Shareholders' Meeting must accredit their professional competence, their merits to fill the vacancy, their experience in the sectors that are relevant for the Company and Group and their knowledge of different business areas with a view to ensuring the contribution of plural standpoints regarding the matters to be dealt with by the Board of Directors.

Notwithstanding the foregoing, the Board of Directors must be composed of proprietary, independent and executive members to properly undertake its functions, and endeavours will be made to ensure that: a) the proprietary and independent members on the Board represent a sizeable majority over executive members; b) the number of executive members be restricted to a minimum, bearing in mind the complexity of the Group and the percentage of shares held by executive members in Company equity, and c) the number of independent members constitute at least half of the total board members.

The Appointments and Remuneration Committee can also be advised by external consultants that specialise in the search for and selection of candidates with a view to strengthening the efficiency, effectiveness and impartiality of procedures to identify potential candidates. Consultants must adhere to the requirements set forth herein when identifying candidates.

Power to appoint and dismiss Board of Director members, as well as to ratify and revoke co-opted appointments, lies with the General Meeting.

Moreover, that which is stipulated in this point is subject in all cases to shareholders’ legally recognised right to proportional representation, in which case directors so appointed will be considered as proprietary directors, as well as subject to the complete freedom of the General Meeting to decide on the appointment of directors.

Appointment, ratification, re-election or dismissal proposals with regard to each director must be voted on separately.

In addition to the reports to be drafted by the Board of Directors and the proposal or report from the Appointments and Remuneration Committee, the following information will be made available to the General Meeting with respect to the proposed ratification, re-election or appointment of directors.

(i)professional and biographical profile; (ii) category of director to which the director belongs, indicating, in the case of proprietary directors, the shareholder represented or with whom the director has ties; (iii) other Boards of Directors on which the director in question serves, as well as other remunerated activities in which the director is involved, whatever the nature of the same; (iv) date of the director's first appointment as a director of Acciona, and of any subsequent appointments; (v) Acciona shares and options held by the director; and (vi) the proposals and reports as required by current legislation.

3. INCOMPATIBILIITIES

Those persons who find themselves constricted by circumstances of incompatibility or prohibition as provided for by law, or as stipulated under Acciona governance standards, may not become directors or be considered as candidates to serve on the Board of Directors.

Occupying a seat on the board will be incompatible with the performance of management and direction functions for, or the provision of professional service tasks to, Acciona competitor companies, as stipulated under the terms and conditions stipulated in the Rules governing the Board of Directors, whenever the importance of the participation or the function undertaken may jeopardise Acciona interests or impinge on the exercise of board member functions by affecting their due independence of criterion and loyalty to the interests of Acciona or the Acciona Group.

The Board of Directors may not propose or appoint people to serve on the Board as independent directors who do not meet the independence criteria laid down by current legislation.

Board members who complete their mandates, or for some other reason cease to perform the functions of their positions, may not provide services to Acciona competitor companies for a term of two years thereafter. The Board of Directors can, if it sees fit, relieve the outgoing member of this obligation or shorten the said term.

4. GENDER DIVERSITY AS A SPECIAL GOAL

Acciona considers the integration of diversity and inclusion as an element of its People Management Strategy.

The Acciona Code of Conduct advocates real equal opportunities, beyond the perspective of gender diversity, and will in no case whatsoever countenance any type of professional discrimination for reasons of age, race, gender, religion, political opinion, national extraction, sexual orientation, social origin, or disability.

Before the end of 2022 and thereafter, under the framework of this diversity strategic element and the terms of Recommendation 15 of the Code of Good Governance of Listed Companies, Acciona aims to have a Board of Directors made up of at least 40% female members. The Appointments and Remuneration Committee has been encouraging the incorporation of female board members for some time now and Acciona intends to meet this goal and to continue promoting measures that will see the company having a significant number of female senior executives.

5. COMPLIANCE SUPERVISION

Every year the Appointments and Remuneration Committee will verify compliance with this policy and report on its conclusions to the Board of Directors. It will likewise report on the conclusions of the Annual Corporate Governance Report.

November 2020

DIRECTORS' REMUNERATION POLICY

DIRECTORS' REMUNERATION POLICY

1. BACKGROUND AND SCOPE OF APPLICATION

The consolidated text of the Corporate Enterprises Act, approved by Royal Legislative Decree 1/2010, of 2 July, approving the Corporate Enterprises Act ("**Ley de Sociedades de Capital**" or "**LSC**") establishes, among other matters, the need for listed companies to have a remuneration policy for their directors.

In accordance with the provisions of Article 529 novodecies of the LSC and Article 31.9 of the Articles of Association of Acciona, S.A. ('**ACCIONA**', the '**Company**' or the '**Corporation**'):

- **the Remuneration Policy must comply with the remuneration system provided for in the Articles of Association and must be approved by the General Shareholders' Meeting as a separate item on the agenda for application during a maximum period of three (3 financial years);**
- **proposals for new remuneration policies for directors must be submitted to the General Shareholders' Meeting prior to the end of the last financial year of application of the previous policy; and,**
- **any amendment or replacement of the policy during its term of validity shall require the prior approval of the General Shareholders' Meeting.**

The Ordinary General Shareholders' Meeting of ACCIONA, held on 23 June 2022, approved the remuneration policy for directors with a term of validity covering the financial years 2023 to 2025 (the "**2023-2025 Policy**").

In this regard, upon reaching the last financial year of the aforementioned remuneration policy, the Board of Directors of ACCIONA, at the proposal of the Appointments and Remuneration Committee, agreed at its meeting on 14 May 2025 to submit for approval by the 2025 General Shareholders' Meeting of ACCIONA, to be held on 25 or 26 June 2025 (with a second call expected to be held on 26 June 2025), the Remuneration Policy for ACCIONA directors for application from the date of its approval and during the 2026, 2027 and 2028 financial years (the "**Remuneration Policy**", the "**2026-2028 Policy**" or the "**Policy**").

The 2026-2028 Policy is accompanied by a reasoned report from the Appointments and Remuneration Committee, in accordance with the aforementioned regulations. Both documents are available to shareholders on the Company's website from the date of the notice of the General Shareholders' Meeting at which this Remuneration Policy is submitted for approval.

If approved by the General Shareholders' Meeting, the Remuneration Policy will replace and render null and void the Company's current Directors' Remuneration Policy, without prejudice to the effects produced and consolidated while it was in force.

2. SUMMARY OF DEVELOPMENTS

The updated Policy introduces several modifications compared to the 2023-2025 Policy, aiming to align with leading market standards and address the expectations of the Company's diverse stakeholders, especially its shareholders.

In particular, following a thorough review process in recent years, the Appointments and Remuneration Committee outlined its commitment in the 2023 Annual Remuneration Report to propose amendments to the Remuneration Policy for approval at the 2025 General Shareholders' Meeting.

In that regard, the 2026-2028 Policy includes the following key changes:

Capping the maximum annual variable remuneration for Executive Directors at 450% of their fixed annual remuneration;

Removing the option to grant additional variable incentives tied to specific projects or strategic milestones (such as extraordinary incentives or *one-off awards*); and,

Establishing a requirement for Executive Directors to hold, directly or indirectly, shares equivalent to two (2) years' gross fixed remuneration during their tenure on the Board and while performing executive duties, consistent with the Spanish National Securities Market Commission's Code of Good Governance for Listed Companies (the "**CBG**").

Additionally, based on feedback from shareholders and other stakeholders, the Policy review incorporates enhancements to improve transparency and clarity, including, among others:

- **A new section 4.2 ('Remuneration practices') to provide shareholders with detailed insights into the key measures taken to implement the Policy regarding ACCIONA directors' remuneration;**
- **A new section 6.3 ('Remuneration comparability analysis (benchmarking)') to elaborate on the criteria used to select a group of comparable companies for the competitiveness analysis of remuneration, conducted by reputable independent external advisors at the request of the Appointments and Remuneration Committee;**
- **A new section 6.4 ('Relative proportion ('remuneration mix') and performance-related payments ('pay for performance')) outlining the connection to performance outcomes and the proportional weight of each component in the Executive Directors' remuneration system, including a chart illustrating this proportion in a scenario of exceeding maximum variable remuneration targets;**
- **Enhanced clarity on the operation of reduction ('malus') and recovery ('clawback') clauses for Executive Directors' variable remuneration, consolidated in a new section 6.11 ('Reduction ('malus') and recovery ('clawback') clauses for variable remuneration'); and,**
- **A new section 10 ('Contribution of the Remuneration Policy to the strategy, interests, and long-term sustainability of the Company'), offering a clearer explanation of how the Policy supports the Company's strategy, interests, and long-term sustainability.**
- **Inclusion of a more detailed description of the criteria used to calculate the annual variable remuneration for Executive Directors;**
- **Inclusion of details about the 2020-2029 Long-Term Incentive Plan Linked to Value Creation ('PILP 2020') in the section on long-term variable remuneration;**
- **A more precise explanation of the rules governing the accrual, deferral, and consolidation of contributions to the Saving Scheme for Executive Directors;**

The Company, recognizing the importance of robust corporate governance and its commitment to engaging with shareholders, maintains ongoing, transparent communication to understand their views on the Remuneration Policy and consider potential improvements.

In this regard, ACCIONA continually evaluates and refines its remuneration policy to secure the widest possible shareholder support. For the Policy review conducted in the 2024 financial year, the Company will take into account: (i) shareholder feedback, (ii) voting outcomes on the Annual Directors' Remuneration Report and the 2023-2025 Policy, including their trends compared to prior years, and (iii) insights from external experts advising the Appointments and Remuneration Committee.

3. OBJECTIVES OF THE REMUNERATION POLICY

The primary goal of this Policy is to establish, within the framework of the remuneration system outlined in the Articles of Association, a competitive compensation structure for ACCIONA's Board of Directors. This structure is designed to support the Company's strategic objectives, fostering sustainable, long-term value creation for shareholders in alignment with the Company's values, both in absolute terms and relative to market standards.

To achieve this, the Policy has been developed with the following aims:

To drive long-term value creation in a way that aligns with the Company's enduring values and interests, while upholding the highest corporate governance standards, promoting transparency, and enhancing the trust of shareholders and other stakeholders in ACCIONA.

To support the Company's business strategy, long-term interests, and sustainability by attracting, retaining, and motivating professionals with the necessary knowledge, skills, and experience to serve on the Board of Directors, ensuring that suitable candidates are available for the position, in accordance with applicable regulations. Section 10 of this Remuneration Policy elaborates on its alignment with the Company's strategy, interests, and long-term sustainability.

To align the remuneration system with ACCIONA's risk profile, promoting effective risk management.

To mitigate potential conflicts of interest.

Drive and reinforce the achievement of the Company's results.

Therefore, in accordance with the requirements of the Corporate Enterprises Act in Articles 217 and 529 novodecies, this Policy aims to define and control, in a clear and concise manner, the remuneration practices of the Company's Directors in order to promote the long-term profitability and sustainability of the Company and, at the same time, incorporate the necessary safeguards to avoid excessive risk-taking and the reward of unfavourable outcomes.

4. REMUNERATION PRINCIPLES AND PRACTICES

4.1 General Principles

To maintain an effective Remuneration Policy, ACCIONA has established clear corporate governance principles.

The Remuneration Policy for both executive and non-executive directors is guided by the following principles:

Alignment with Business Strategy	The Board of Directors will set remuneration that supports the Company's business strategy, risk tolerance, values, and long-term sustainability.
Governance and Transparency	The Board of Directors will implement measures to ensure robust governance and transparency in directors' remuneration.
Balanced Structure	The Board of Directors will strive for a fair balance between fixed and variable remuneration, short-term and long-term components, and cash and share-based payments. Variable remuneration should be substantial and include technical safeguards to ensure it reflects the professional performance of recipients, rather than merely resulting from general market trends, the Company's industry performance, or similar factors. The Board shall in particular consider the specific situation of the Executive Directors, whose interests may already be aligned with those of the Company's shareholders; in which case, in order not to harm unnecessarily the liquidity of the shares and make an inappropriate use of the equity, it will ensure that variable remuneration is not paid in the form of shares or rights over shares.
Internal Fairness	The Board of Directors will ensure the Policy provides comparable remuneration for similar roles and levels of responsibility.
Market Competitiveness	The Board of Directors will engage reputable external experts to conduct periodic market benchmarking analyses, ensuring the remuneration system's structure and overall design remain competitive to attract and retain leaders who advance the Company's strategy and long-term sustainability.
Connection to Employee Conditions	When determining the remuneration conditions for Executive Directors outlined in this Policy, the remuneration framework for ACCIONA employees has been considered, as detailed further in section 9 of this Policy.

4.2 Remuneration practices

The implementation of this Policy's general principles results in a set of practical actions, with key elements outlined below:

No Guaranteed Remuneration	The Directors' remuneration system does not permit guaranteed variable remuneration or automatic increases in fixed remuneration.
Pay for Performance	A substantial portion of total remuneration is tied to achieving the Company's strategic objectives, which foster sustainable, long-term value creation for shareholders.
Results-Driven Variable Remuneration	Variable remuneration incorporates the necessary cautionary measures to ensure that such remuneration is related to the professional performance of its beneficiaries and the evolution of ACCIONA's results, and does not simply derive from the overall performance of the stock markets or of the Company's sector of activity.
Shareholder Value Protection	Long-term variable remuneration focuses exclusively on generating sustained value for all shareholders, is anticipated to be paid in cash, and requires a minimum threshold for value creation and total shareholder return.
Risk-Aligned Remuneration	Remuneration is subject to reduction ('malus') and recovery ('clawback') clauses, among other measures, to address circumstances impacting the Company's risk profile.
Independent Expertise	The Appointments and Remuneration Committee regularly seeks independent advice from specialized firms. As part of this guidance, the Appointments and Remuneration Committee commissions a total compensation analysis to evaluate remuneration competitiveness against market standards, ensure alignment with long-term value creation and sustainable performance, and promote effective risk management. This approach supports a policy that attracts, motivates, and retains top talent across ACCIONA's operating markets. During the 2024 process to develop and refine this Policy, the Appointments and Remuneration Committee obtained expert, independent advice from Willis Towers Watson (WTW) for market competitiveness analysis and J&A Garrigues, S.L.P. for legal perspectives. The Appointments and Remuneration Committee may engage additional external advisors for market studies and analyses as needed, and at a minimum, whenever it prepares or reviews the Directors' remuneration policy.

Metrics	The variable remuneration structure integrates various objectives, including goals for shareholder value creation, business targets based on financial metrics aligned with the strategic plan, sustainability objectives, and evaluations of each Director's individual professional performance. The objectives and metrics tied to variable remuneration are regularly reviewed to ensure the Company maintains a competitive system that attracts, motivates, and retains leaders capable of executing the Company's strategy and supporting its long-term sustainability. Specifically, the Board of Directors may adjust the objectives for annual variable remuneration each year to reflect the Company's strategic priorities, ensuring incentives remain aligned with sustainable, long-term value creation. For the evaluation of annual economic objectives, the Board may consider financial and value creation metrics such as EBITDA, BAI, debt levels, and other economic targets set at the start of the year in accordance with the Company's strategy. Regarding sustainability objectives, ACCIONA's strategy focuses on achieving sustainable economic, social, and environmental development, guided by its Sustainability Master Plan (SMP). The initiatives and goals within these plans are promoted, approved, and overseen by the Audit and Sustainability Committee of the Board of Directors.
	To integrate its sustainability and decarbonization strategy, ACCIONA has gradually increased the emphasis on sustainability performance in determining the annual variable remuneration for its management, which also serves as a benchmark for calculating the annual variable remuneration of Executive Directors. When setting sustainability objectives, the Appointments and Remuneration Committee may incorporate criteria related to areas such as taxonomy, decarbonization, workforce development, or achieving prominent positions in leading rankings and indices, among others.

5. SYSTEM OF REMUNERATION OF THE BOARD OF DIRECTORS FOR ITS COLLECTIVE DUTIES

5.1 Provisions of the Articles of Association

Article 31.3 of ACCIONA's Articles of Association establishes that the remuneration of Directors, in their capacity as such, shall consist of a fixed annual allowance determined by their membership of the Board of Directors and the Committees to which the Director belongs and taking into consideration the duties and responsibilities attributed to each of them.

The amount of annual remuneration that may be paid by the Company to its Directors as a whole for forming part of the Board of Directors and its Committees shall be determined by the Remuneration Policy in force approved by the General Shareholders' Meeting. The Policy shall remain in force until the General Shareholders' Meeting agreed its modification, although the Board of Directors may reduce the amount in the years it considers appropriate.

Unless the General Meeting or the Remuneration Policy establishes otherwise, the exact amount to be paid within this maximum limit and its distribution among the various Directors shall be determined by the Board of Directors, subject to a report from the Appointments and Remuneration Committee, and taking into account the posts, functions and responsibilities attributed to each Director: whether they form part of the Board's Committees, the duties performed in them and other objective circumstances which are considered relevant.

In addition, and in accordance with article 31.11 of the Articles of Association, ACCIONA may take out civil liability insurance for its Directors under the usual conditions and in proportion to the circumstances of the Company itself.

5.2 Remuneration items

The Remuneration Policy aims to remunerate Directors for their position as such, i.e. for performing supervisory and collegiate decision-making tasks within the Board of Directors and the Committees of which they form part, in a manner that is appropriate and sufficient for their dedication, functions and responsibilities, without compromising their independence of judgement. Notwithstanding the above, the Executive Directors do not receive any remuneration for their collective oversight and decision-making functions.

In compliance with the above statutory provision, the remuneration system for Directors established in this Remuneration Policy for their supervisory and collegiate decision-making functions consists of the following remuneration elements:

- **Fixed annual remuneration for membership of the Board of Directors.**
- **Additional fixed annual remuneration for membership of the following Delegate Committees of the Board of Directors (the "Delegate Committees"):**
  - Audit and Sustainability Committee.
  - Appointments and Remuneration Committee.
  - Executive Committee, if formed.
- **Additional fixed annual remuneration for chairing Delegated Board Committees.**
- **Additional fixed annual remuneration for the position of Lead Independent Director.**

In addition, ACCIONA has taken out civil liability insurance for its directors and executives and covers travel and other expenses necessary for the performance of their duties. The reimbursement of these duly justified expenses shall not be considered as allowances (remuneration).

Directors may receive the remuneration to which they are entitled for membership of certain administrative bodies of some of ACCIONA's subsidiaries or investee companies, such as Acciona Energía.

5.3 Maximum amount of remuneration

In accordance with the provisions of article 31.3 of ACCIONA's Articles of Association, the maximum amount of gross annual remuneration payable to the Directors as a whole (except for the Executive Directors) in their capacity as such is one million seven hundred thousand (1,700,000) euros. This amount may be updated during the term of the Policy by resolution of the General Shareholders' Meeting.

Unless the General Shareholders' Meeting determines otherwise, the distribution of remuneration among the Directors shall be established by resolution of the Board of Directors, which shall take into consideration the functions and responsibilities attributed to each one, membership of Board Committees and such other facts it deems relevant.

5.4 Fixed annual remuneration

The Board of Directors is responsible for distributing the maximum annual amount among its members and for this purpose shall establish the criteria for determining the amounts corresponding to each Director, taking into account, in addition to any other objective circumstances it deems relevant:

- **The category of the Director;**
- **The role played by the Director on the Board of Directors and on any of its Committees;**
- **The specific tasks and responsibilities undertaken during the year;**
- **The expertise and qualifications required for said tasks; and,**
- **The amount of time and dedication required to fulfil it.**

Specifically, of the maximum amount set in section 5.3 of this Policy, the Board of Directors has decided on the following amounts to be paid as fixed annual allowance:

	Board of Directors	Audit and Sustainability Committee	Appointments and Remuneration Committee	Executive Committee[3]
Chairman[1]	-	18,000 euros	11,000 euros	-
Member[2]	100,000 euros	70,000 euros	55,000 euros	55,000 euros
Lead Independent Director[1]	30,000 euros adicionales	-	-	-

1. Amounts additional to the remuneration as member of the Board of Directors or member of its Delegate Committees.
2. Executive Directors do not receive a fixed remuneration for their membership of the Board of Directors.
3. If constituted.

However, the Board of Directors may amend the aforementioned amounts of remuneration within the maximum total amount of annual remuneration approved by the General Shareholders' Meeting to be paid to all Directors in their capacity as such.

The remuneration system, as well as the details of remuneration, shall be disclosed on an annual basis in the corresponding Annual Directors' Remuneration Report.

6. SYSTEM OF REMUNERATION FOR THE PERFORMANCE OF EXECUTIVE FUNCTIONS

6.1 Provisions of the Articles of Association

Article 31.4 of the Articles of Association stipulates that remuneration derived from membership of the Board of Directors shall be compatible with any other remuneration (fixed salaries; variable remuneration based on the achievement of business, corporate and/or personal performance objectives; compensation for termination of the Director's office for reasons other than breach of their duties; welfare systems; deferred remuneration items) which, following a proposal by the Appointments and Remuneration Committee and by resolution of the Board of Directors, may correspond to the Director for the performance of other functions in the Company, whether these functions are executive, senior management or of another nature, other than those of supervision and collegiate decision-making carried out as mere members of the Board.

Article 31.5 of the Articles of Association establishes that, subject to a resolution of the General Shareholders' Meeting with the legally required scope, Executive Directors may also be remunerated by the delivery of shares or share options or by any other remuneration scheme indexed to the value of the shares.

6.2 Remuneration items

In compliance with the foregoing provisions of the Articles of Association, the remuneration system for Executive Directors consists of the following elements of remuneration, which are implemented in the respective contracts approved in accordance with article 249 of the Corporate Enterprises Act:

- **Annual fixed remuneration;**
- **Annual variable remuneration;**
- **Long-term variable remuneration;**
- **Saving Schemes; and,**
- **Remuneration in kind.**

6.3 Remuneration Comparability Analysis (benchmarking)

As part of its regular review of the Directors' Remuneration Policy, the Appointments and Remuneration Committee engages reputable external advisors to conduct competitiveness analyses, producing reports on the total compensation competitiveness relative to a group of companies chosen based on specific criteria.

The selection criteria for the comparison group consider the following key aspects of ACCIONA's business:

- **It is a leading developer and operator of sustainable and regenerative energy and infrastructure assets, prioritizing the energy transition to a zero-emission world, with a significant portion of its economic activity being sustainable and aligned with the European Union's environmental taxonomy objectives;**
- **sustainability is central to its operations;**
- **it is a publicly listed company and part of the IBEX-35 stock market index;**
- **it has a strong international presence; and,**
- **it operates across diverse sectors with varied business models.**

In 2024, to shape this Policy, the Appointments and Remuneration Committee collaborated with a distinguished external consultant to perform competitiveness analyses, preparing a report on total compensation competitiveness for a group of companies selected based on criteria reflecting ACCIONA's core business characteristics, as outlined above.

Given these attributes, the criteria for selecting the comparison group focus on leading sustainability-focused companies with an international presence and a size and ownership structure similar to ACCIONA, considering:

- **revenue;**
- **total assets;**
- **market capitalization; and**
- **workforce size.**

Additionally, companies operating in sectors relevant to ACCIONA and included in key stock market indices, i.e. the IBEX-35 and Dow Jones Sustainability World Index, were taken into account.

Based on this analysis, the Appointments and Remuneration Committee determined that the total remuneration for Executive Directors is competitive, enabling the attraction, retention, and motivation of professionals suited to achieving the Company's strategic goals.

6.4 Relative Proportion ('Remuneration Mix') and Performance-Related Payments ('Pay for Performance')

The remuneration strategy for ACCIONA's Executive Directors seeks to establish a competitive compensation system that incentivizes these professionals to achieve the Company's strategic objectives, promoting sustainable, long-term value creation for shareholders.

To this end, the remuneration system for Executive Directors emphasizes variable remuneration as a significant portion of total compensation. Most of the total remuneration is contingent on meeting the objectives set for variable remuneration (pay for performance). Even when objectives are met, the maximum annual variable remuneration cannot exceed 450% of the annual fixed remuneration under any scenario.

To set the total compensation for Executive Directors, the Appointments and Remuneration Committee, guided by market-aligned reasonableness criteria established by the Board of Directors, regularly seeks advice from reputable external experts to conduct remuneration benchmarking against leading global sustainability-focused companies comparable to ACCIONA.

6.5 Fixed annual remuneration

Executive Directors shall be entitled to receive a fixed remuneration for the increased level of dedication and responsibility involved in the performance of their duties, which shall be competitive in relation to the usual industry standards for positions of the level of responsibility they hold.

The Executive Chairman shall receive a gross annual fixed remuneration of one million three hundred and seventy-five thousand (1,375,000) euros. The Executive Vice-Chairman shall receive a gross annual fixed remuneration of seven hundred and thirty-eight thousand (738,000) euros.

These amounts shall remain fixed unless the Board of Directors agrees to update them. In this regard, the Board of Directors may review, at the proposal of the Appointments and Remuneration Committee, the amounts corresponding to the fixed remuneration of Executive Directors based on their performance and the conclusions of external competitiveness analyses carried out with respect to the market practices of companies comparable to ACCIONA, selected in accordance with the criteria established in section 6.3 above.

Such revision shall be included in the Annual Directors' Remuneration Report which the Board of Directors shall make available to the shareholders yearly when convening the General Shareholders' Meeting for a consultative vote and which is available to the shareholders on the Company's website.

6.6 Annual Variable Remuneration

The primary basis for determining annual variable remuneration is the achievement of financial targets outlined in the annual budgets. Additionally, the weighting of sustainability goals and the evaluation of each Executive Director's individual professional performance, as assessed by the Appointments and Remuneration Committee and ultimately approved by the Board of Directors, play a significant role.

Tying variable remuneration to both quantitative and qualitative objectives supports a business model that encourages balanced, sustainable development and promotes social cohesion. When establishing objectives and evaluating their achievement, the Appointments and Remuneration Committee will also take into account any associated risks.

In determining the annual variable remuneration amount, the Appointments and Remuneration Committee will consider:

(i) the level of achievement and weighting of each financial and non-financial objective individually;

(ii) the overall attainment of the objectives as a collective set;

(iii) as a benchmark, the average annual variable remuneration trends of chief executive officers of the businesses and functional directors;

(iv) the individual performance level, as evaluated by the Board of Directors based on the Appointments and Remuneration Committee's proposal, considering the responsibilities of the role and business milestones related to the strategic plan's progress; and,

(v) any risks tied to the development of ACCIONA's business activities. To do this, the procedures established by the Company to assess the objectives shall be applied.

During this evaluation process, the Appointments and Remuneration Committee may consult other Delegate Committees and Company departments, led by the Economic-Financial and Sustainability Department, to gather data on financial and non-financial performance, as well as environmental, social, and corporate governance factors.

Variable remuneration will be disbursed once the extent of compliance with pre-set objectives is confirmed, following the Board of Directors' preparation of the financial statements and the determination of the specific amount, as proposed by the Appointments and Remuneration Committee. For this purpose, any qualifications in the auditor's report that lead to a material restatement of the consolidated financial statements of ACCIONA and its group (excluding changes in accounting standards) (the 'ACCIONA Group' or the 'Group') for any relevant financial year will be factored in.

The maximum annual variable remuneration shall not, under any circumstances relating to the target, exceed 450% of the fixed annual remuneration.

If the contractual relationship ends or the delegation of executive functions is revoked before the annual variable remuneration accrual period concludes, for reasons not attributable to the Executive Director, they will be entitled to a prorated portion corresponding to the actual period of service in the financial year of termination.

The annual variable remuneration will be paid either in cash at the time of disbursement or deferred through an extraordinary contribution to a Saving Scheme (as defined in section 6.8 of this document), at the discretion of each Executive Director.

It will also be subject to a clawback clause, as outlined in section 6.11, for three (3) years following its payment.

6.7 Long-term Variable Remuneration

Executive Directors may be the beneficiaries of long-term remuneration schemes whose aim is the creation of value and which are implemented by cash payments, through the delivery of shares or rights to shares and/or through extraordinary contributions to the Saving Scheme, as well as any other remuneration system which is benchmarked against the value of shares or linked to the long-term creation of value for shareholders.

The decision to award remuneration schemes consisting of the delivery of shares or rights to them, as well as any other remuneration scheme which uses as a benchmark the value of ACCIONA shares, corresponds by law and the Articles of Association to the General Shareholders' Meeting, following a report from the Appointments and Remuneration Committee.

The application of any of these remuneration schemes to the Executive Directors is expressly provided for in articles 31.4 and 31.5 of ACCIONA's Articles of Association and in articles 55.1 and 55.4 of the Board of Directors' Regulations.

Long-term remuneration systems for Executive Directors shall have the following characteristics:

- **The schemes shall cover a minimum target measurement period of at least three years to ensure a long-term approach.**
- **The metrics to be used and the targets to be met shall be defined by the Board of Directors, at the proposal of the Appointments and Remuneration Committee, ensuring in all cases that they are related to value creation and the professional performance of its beneficiaries and are not simply derived from the overall performance of the stock markets or of the Company's sector of activity.**
- **Metrics which measure value creation directly and/or indirectly may be included within the Board of Directors' freedom of decision. The following metrics may be included, among others:**
  - Total Shareholder Return (and its corresponding rate) for the reference period, as the measure of value creation for shareholders;
  - Net Debt/EBITDA ratio, on a consolidated basis at the close of the last financial year in the reference period;
  - Ordinary profit before tax for the reference period;
  - Net earnings by share for the reference period;
  - Comparison of the estimates of the future price of ACCIONA shares and recommendations of no fewer than four (4) analysts who carry out a significant monitoring of the share in December of the financial year before the reference period and January of the year following the conclusion of the reference period; and,
  - Comparison of the price of ACCIONA shares, measured against the IBEX-35 index between the first and last financial years of the last reference period.

After taking into account the recommendation of the Appointments and Remuneration Committee, the Board of Directors shall define at least the following with respect to the agreed metric(s):

- The minimum level below which no achievement is considered to have been attained; and,
- In the event of more than one metric, the weighting attributed to each of them in the quantification of the level of achievement in the reference period.

- **Regarding the evaluation of objectives, at the conclusion of the measurement period, the Appointments and Remuneration Committee will assess the extent to which objectives have been met, based on predefined achievement levels and the Company's established objective evaluation procedures.**
- **For this assessment, the Appointments and Remuneration Committee may consult other Delegate Committees and relevant Company departments to obtain pertinent information.**
- **Settlement and Payment of Long-Term Variable Remuneration. Long-term remuneration systems must incorporate safeguards to prevent excessive risk-taking and the rewarding of unfavourable outcomes.**
- **Specifically, the settlement and payment of long-term variable remuneration will occur only after the Board of Directors, upon the recommendation of the Appointments and Remuneration Committee, approves the level of objective achievement and the corresponding amount. Settlement will be deferred until the Board has finalized the consolidated financial statements of ACCIONA and its Group for the final financial year of the objective measurement period.**
- **Additionally, at least 20% of the long-term incentive owed to Executive Directors will be deferred for one (1) year, with payment made after the preparation of the consolidated financial statements of ACCIONA and its Group for the financial year following the last objective measurement period, provided an unqualified audit report is issued.**
- **The schemes may be paid in cash, through the delivery of shares, options on shares or remunerative rights linked to share values and/or extraordinary contributions to the Saving Scheme, provided that they comply with the targets established for this purpose.**
- **Early Settlement. Long-term variable remuneration plans may allow for early settlement if the contractual relationship ends or the delegation of executive functions is revoked for reasons not attributable to the Executive Director before the objective measurement period concludes. In such cases, the Executive Director will be entitled to a prorated amount based on the actual period of service during the consolidation period.**
- **In the case of remuneration schemes consisting of the delivery of shares, in no case may the number of shares delivered exceed the maximum number of shares approved by the General Meeting.**
- **The cost of payment on account of the share-based remuneration schemes will not be charged to the beneficiaries, with the Company assuming the tax cost which said income on account has in the personal taxation of the beneficiaries within the limits established by law.**
- **Long-term variable remuneration is subject to the provisions laid down in section 6.11 of this Policy, which permits the full or partial cancellation of unpaid long-term variable remuneration (malus clause) and the full or partial recovery of payments within three (3) years from the payment date (clawback clause) under specific circumstances.**

6.7.1 2020-2029 Long-Term Incentive Plan Linked to Value Creation

As of the approval date of this Policy, the sole long-term variable remuneration component for Executive Directors is the 2020 PILP, endorsed by the 2020 General Shareholders' Meeting with 93.77% of votes in favour. While this Policy and the Annual Directors' Remuneration Report reference the 2020 PILP, a more comprehensive explanation is provided in section 4.3 of the proposed resolutions submitted by the Board of Directors for approval at the General Shareholders' Meeting on 28 May 2020, which authorized the 2020 PILP.

The 2020 PILP spans ten (10) years, from 1 January 2020 to 31 December 2029, inclusive.

The 2020 PILP is tied to value creation metrics: (i) total shareholder return ('TRTA') and (ii) weighted average cost of capital ('WACC'). For the plan's purposes, the WACC is set as a minimum threshold; if the TRTA does not exceed the WACC during the measurement period (1 January 2020 to 31 December 2029, inclusive), no value is deemed created for ACCIONA's shareholders, and thus no incentive is awarded to Executive Directors.

If commercial relations between an executive director and Acciona, S.A. are terminated, or the executive functions delegated to such director are revoked at any time during the term of the plan for reasons beyond his/her control, the plan will be settled in advance with respect to the two executive directors.

For the 2020 PILP, settlement will be entirely in cash, with the total amount for both Executive Directors capped at 1% of the value created for shareholders over the ten-year (10) plan duration (measured as the TRTA generated in that period), provided the TRTA exceeds the WACC.

The incentive, if applicable, will be settled according to the following timeline.

La liquidación, en su caso, del incentivo tendría lugar conforme al siguiente calendario:

- **80% in 2030, after the preparation of the 2029 consolidated financial statements of ACCIONA and its Group for which an unqualified audit report is issued.**
- **The remaining 20% in 2031, after the preparation of ACCIONA and its Group's consolidated financial statements for the 2030 financial year, provided an unqualified audit report is issued and no conditions trigger the variable remuneration reduction mechanism ('malus').**

The 2020 PILP incorporates the provisions in section 6.11 of this Policy, allowing for the full or partial cancellation of unpaid long-term variable remuneration (malus clause) and the recovery of payments within three (3) years from the date of any 2020 PILP payment (clawback clause) under specific circumstances.

6.8 Saving Scheme

The Company has established a defined contribution scheme linked to survival to a certain age, permanent disability in the degrees of total, absolute and severe disability, and death, aimed exclusively at Executive Directors for the purpose of supplementing their public Social Security benefits (the '**Saving Scheme**'), under the terms and conditions set out in the Regulations of the aforementioned Scheme and summarized in the following table.

Form	It is a defined contribution scheme managed externally, where the Company pays annual premiums to an insurance company on behalf of the Executive Directors.
Contingencies Covered by the Policy	• Survival to a specified age. • Death and permanent disability (as stipulated in the Saving Scheme Regulations).
Contributions	(i) Ordinary contributions may be made to the abovementioned schemes, the amount of which is determined by the Board of Directors, upon the recommendation of the Appointments and Remuneration Committee, in line with the Executive Directors' contracts, and (ii) extraordinary contributions, at the discretion of the Executive Directors, who, as per section 6.6, may opt to allocate all or part of their annual variable remuneration to the Saving Scheme. Ordinary contributions for Executive Directors are made annually, equivalent to 100% of their fixed remuneration. The Board of Directors, upon the Appointments and Remuneration Committee's proposal, may adjust these contributions to reflect business developments and market conditions. In addition, the Board of Directors, at the proposal of the Appointments and Remuneration Committee, may approve additional contributions to the aforementioned Executive Directors' Saving Scheme, giving details in the Annual Directors' Remuneration Report. Contributions to the Saving Scheme are subject to deferral and consolidation conditions, which apply uniformly to both ordinary and extraordinary contributions. Thus, contributions to the Saving Scheme represent a potential right with an uncertain final economic value, which could range from (i) zero, if circumstances outlined below lead to the loss of rights to the funds, to (ii) an amount dependent on the accumulated fund value when a covered contingency occurs.
Loss of Status as a Participant in the Saving Scheme	The Company will stop paying premiums to the Saving Scheme upon the occurrence of any of the following, without affecting any economic rights the Executive Directors may have: • Occurrence of a covered risk contingency (in which case the Executive Directors receive the benefit). • Reaching age 65. • Ceasing to serve as an Executive Director of ACCIONA for reasons other than those listed above.

Conditions for Consolidation	Executive Directors will forfeit their accumulated economic rights under the Saving Scheme, and thus not receive the associated benefit (which will be paid to the Company), if they cease to be an Executive Director of ACCIONA: • Due to voluntary resignation or termination. • Due to a breach of duties or causing harm to ACCIONA, as confirmed by a final court ruling from the competent authority.
Payment	The benefit from the Saving Scheme is deferred until a covered contingency occurs (e.g., retirement, disability, or death). The insurance company will directly pay the benefit arising from the Saving Scheme to the beneficiaries (the Executive Directors or their successors in case of death), net of applicable personal income tax ('IRPF') withholdings or other taxes, where applicable, which the beneficiary will bear.
Cancellation or Expiry	The Board of Directors, at the proposal of the Appointments and Remuneration Committee, may approve the cancellation or early maturity of the Saving Scheme, in whole or in part, and may recognise financial compensation to Executive Directors in the event of cancellation, provided that their accrued economic rights have not been forfeited by that date. The aforementioned compensation may not exceed the funds accumulated in the Saving Scheme that are subject to cancellation, giving the corresponding details in the Annual Directors' Remuneration Report, as the case may be.

6.9 Other Remuneration in Kind

In addition to the remuneration components mentioned previously, Executive Directors are provided with certain in-kind benefits, including: life insurance, a company car, and medical insurance, as per the Company's prevailing benefits policy.

The Board may approve changes to this remuneration at the proposal of the Appointments and Remuneration Committee.

Executive Directors shall be entitled to reimbursement of any reasonable expenses (travel, transport, subsistence, mobile telephone, representation or otherwise) incurred in the performance of their services to the Company, provided they are duly documented.

The tax cost associated with in-kind remuneration payments for Executive Directors will not be covered by them, but by the Company, within legal limits, ensuring these costs are not passed on to the Directors.

6.10 Minimum Shareholding Requirements ('Shareholding Guidelines')

To align with shareholder interests, Executive Directors are required to hold (directly or indirectly) shares (including those potentially received under the Remuneration Policy) equivalent to two (2) years' gross fixed remuneration for as long as they serve on the Board of Directors and perform executive roles, consistent with the CBG recommendations.

A five (5)-year period is set to meet this requirement, starting from 1 January 2025, or, for Executive Directors appointed later, from their appointment date, unless the Board of Directors or the Appointments and Remuneration Committee extends this period in exceptional cases.

Until the required shareholding is achieved, shares obtained by an Executive Director through any variable remuneration plan must be held for a minimum of three (3) years.

The above restriction shall not apply to shares that Executive Directors need to dispose of in order to cover the costs related to their acquisition or, subject to the favourable opinion of the Appointments and Remuneration Committee, to deal with extraordinary situations that may arise and require such action.

The Appointments and Remuneration Committee will oversee compliance with this commitment, evaluating factors such as the share price to be used and the frequency of reviewing the holding obligation.

6.11 Variable Remuneration Reduction ('Malus') and Recovery ('Clawback') Clauses

6.11.1 Annual variable remuneration

Annual Variable Remuneration Within three (3) years from the payment date of the annual variable remuneration, the Board of Directors, upon the recommendation of the Appointments and Remuneration Committee, may demand from Executive Directors ('clawback'):

- **the repayment of amounts paid if their calculation relied on data later proven to be clearly inaccurate; and,**
- **a refund of the amounts paid, and/or not pay the amounts to which it is entitled ('malus'), when the Directors have incurred a serious breach of their duties of diligence or loyalty based on which they must discharge their duties at ACCIONA or for any other serious and culpable breach of the obligations that the Executive Directors assume by virtue of the contracts signed with ACCIONA to discharge their executive duties.**

6.11.2 Long-term Variable Remuneration

Reduction Clause ('Malus'): The Board of Directors, based on a report from the Appointments and Remuneration Committee, may decide to cancel all or part of unpaid long-term variable remuneration under the following circumstances:

- **the Executive Director incurs a serious breach of the duties of diligence or loyalty pursuant to which he must perform his office at ACCIONA, or incurs any other serious, culpable breach of the obligations that the Executive Director has undertaken by virtue of his contract with ACCIONA to discharge his executive functions;**
- **it is discovered that the incentive due to the Executive Director under the long-term variable remuneration plan was calculated using data later proven to be manifestly incorrect; or,**
- **the Executive Director is in breach of any post-contractual non-compete covenant signed with or assumed vis-à-vis ACCIONA.**

Recovery Clause ("clawback"): The Board of Directors, following a report from the Appointments and Remuneration Committee, may require Executive Directors to repay, in whole or in part, any incentive paid ('clawback') within three (3) years from each payment date (including deferred portions). This applies if, during this three-year (3) period, any of the circumstances outlined in the reduction clause ('malus') above occur.

6.12 Main terms and conditions of contracts

The main terms and conditions of the Executive Directors' commercial contracts are as follows:

Duration	**Indefinite.** Executive Directors provide their services in the performance of executive duties under indefinite-term commercial contracts. Article 31.1 of ACCIONA's Articles of Association establishes a three-year term of office for directors, who may be re-elected one or more times. The Board of Directors' Regulations establish that the Executive Directors must tender their resignation to the Board of Directors, and if the Board considers it appropriate, may formalise the resignation when they resign from the executive office for which they have been appointed director.
Termination benefits	**No termination scenarios are foreseen.** The contracts do not provide for any compensation for early termination or removal of Executive Directors from exercise of their executive duties, nor are there any hiring bonuses, continuity clauses or notice periods.
Advance notice	**No notice is provided.**
Exclusivity	**The provision of services is carried out in an exclusive and fully dedicated manner.** Services are rendered by the Executive Directors on the basis of sole and full dedication, without prejudice to the possibility of holding positions in family companies whose activity is not in competition with the ACCIONA Group, or institutional representative positions in non-profit institutions, subject to express authorisation by the Company, where such authorization shall not be unreasonably withheld, and provided that the rules of corporate governance are fulfilled.
Confidentiality	**During the term of the relationship and after its termination.** During the term of the relationship and after its termination, a duty of confidentiality is established with respect to information, data, and any type of document of a confidential nature that they know about and to which they have had access as a result of the exercise of their duties.
Post-contractual non-compete	**There is no specific remuneration for this commitment.** For a further period of one year from the termination of their contract with the Company, Executive Directors shall refrain from: • Rendering services, directly or indirectly, to any person, business or company (whether as a partner, officer, employee, consultant, investor, borrower or otherwise) that is in competition with the business of the Company or the ACCIONA Group, unless expressly authorized by the Company, where such authorization must not be unreasonably withheld. • Holding, directly or indirectly, the capital of any company or entity that is in competition with the business of the Company or the ACCIONA Group. This prohibition will not be held to have been breached where the interest held is not significant. For these purposes, it will be considered that a shareholding is not significant where the investment does not directly or indirectly confer any management function or significant influence in the competing company. • Employing, or attempting to employ or persuading any member (of staff or) of the management team of the Company or of any other company belonging to the ACCIONA Group to resign, or persuading or attempting to persuade any agent, client, supplier or collaborator of the Company or of the ACCIONA Group to terminate their relationship with them. There is no additional compensation for the non-compete clause assumed by the Executive Directors, which is understood to be compensated by the fixed and variable remuneration actually received during the term of the contract.

7. REMUNERATION POLICY APPLICABLE TO NEW DIRECTORS

The remuneration system described above for Executive Directors shall apply to any Executive Director who joins the Board of Directors during the term of this Policy.

The Board of Directors, subject to a report from the Appointments and Remuneration Committee, shall determine the items and amounts of the remuneration system applicable to the new Executive Director, taking into account the time of their incorporation, the duties assigned, the responsibilities assumed, his professional experience, the market remuneration of that post and any others it deems appropriate, which shall be duly reflected in the corresponding contract to be signed between the Company and the new Executive Director.

In the event that new non-executive members join the Board of Directors during the term of this Policy, the remuneration system described in section 5 above shall apply to them.

Any remuneration established for new Directors in their capacity as such and for Executive Directors will be detailed in the corresponding Annual Directors' Remuneration Report.

8. GOVERNANCE OF THE POLICY AND MANAGEMENT OF CONFLICTS OF INTEREST

8.1 Process for determining, reviewing, and applying the Policy

In line with (i) Articles 11 and 41 of the Articles of Association, Articles 7, 30, 31, and 54 of the Board of Directors' Regulations, and (ii) the provisions of this Policy, the roles of ACCIONA's corporate bodies in the determination, application, review, and approval of the Remuneration Policy are outlined below.

Bodies	Powers
General Shareholders' Meeting	• Approve the Directors' Remuneration Policy at least every three years as a distinct agenda item. • Approve the maximum annual remuneration for all Directors in their capacity as such. • Approve variable remuneration systems for Executive Directors, including grants of shares, share options, or remuneration tied to share value. • Conduct an advisory vote on the Annual Directors' Remuneration Report, detailing remuneration accrued during the financial year.
Board of Directors	• Propose new remuneration policies or necessary amendments to the General Shareholders' Meeting, ensuring compliance with current regulations and good governance standards. • Establish a control and oversight system to ensure adherence to and effective implementation of this Policy. • For Directors in their capacity as such: • Approve the individual allocation of their remuneration within the framework of the Articles of Association and the Remuneration Policy, based on the maximum amount approved by the General Shareholders' Meeting. • For Executive Directors: • Approve contracts governing their duties and responsibilities, including fixed remuneration and key terms of the variable remuneration system, in accordance with their contracts and the Remuneration Policy. • Approve the Annual Directors' Remuneration Report for submission to the General Shareholders' Meeting for an advisory vote. • Ensure remuneration policies in force at all times include technical safeguards to link variable remuneration to the professional performance of beneficiaries, rather than general trends related to the market or industry in which the Company conducts its business, or similar factors. • Decide on the application of reduction ('malus') and recovery ('clawback') clauses for annual and long-term variable remuneration, as outlined in section 6.11 of this Policy.

	• Authorize temporary exceptions to the Directors’ Remuneration Policy when such temporary exceptions are necessary to support the Company’s long-term interests, sustainability, or viability.
Appointments and Remuneration Committee	• Propose the Directors’ Remuneration Policy to the Board, along with individual remuneration and contractual terms for Executive Directors, ensuring compliance and transparency. • Prepare a preliminary report for determining Directors’ remuneration amounts. • Review the terms of Executive Directors’ contracts to ensure alignment with the Remuneration Policy. • Assess the Directors’ annual remuneration system and amounts, ensuring individual remuneration is proportionate to that of other Directors with comparable responsibilities and dedication. • Regularly evaluate the Remuneration Policy, including variable remuneration programs (in shares or cash), to ensure their appropriateness and effectiveness. • Address and resolve any conflicts of interest related to the application and review of the Remuneration Policy. • Ensure the independence of external advisors of the Appointments and Remuneration Committee, providing advice on matters within its purview. • Verify the accuracy of directors’ remuneration information in corporate documents, such as annual and half-yearly financial reports, the Annual Corporate Governance Report, and the Annual Directors’ Remuneration Report. • Prepare a preliminary report for decisions regarding the application of reduction (‘malus’) and recovery (‘clawback’) clauses for annual and long-term variable remuneration, as specified in section 6.11. • Prepare a preliminary report for applying temporary exceptions to the Directors’ Remuneration Policy when necessary to serve the Company’s long-term interests, sustainability, or viability.
Audit and Sustainability Committee	• Assist the Appointments and Remuneration Committee in selecting, designing, and reviewing financial and non-financial metrics used for variable remuneration.

8.2 Measures to Prevent or Manage Conflicts of Interest

Consistent with the Corporate Enterprises Act, ACCIONA's Board of Directors' Regulations outline obligations related to the duty of loyalty (Article 42 of the Board of Directors' Regulations) and the avoidance of conflicts of interest (Article 43 of the Board of Directors' Regulations).

Article 43 defines a conflict of interest as any situation where the interests of the Company or the ACCIONA Group clash, directly or indirectly, with a Director's personal interests.

Directors are required to notify the Board of Directors of any potential conflict of interest and abstain from participating in discussions, decisions, or actions related to operations where they have a direct or indirect conflict.

Likewise, Executive Directors are excluded from deliberations and decisions regarding their contracts or any amendments to them.

8.3 Exceptions

The Company may apply, within the current regulatory framework, exceptions to any or all of the remuneration items described in this Policy, depending on the particular needs of ACCIONA's business, as well as those derived from the macroeconomic situation of the geographies in which the Company operates.

These exceptional circumstances shall only relate to situations where the exception to the Remuneration Policy is necessary to serve the long-term interests and sustainability of the Company as a whole or to ensure its viability.

The application of exceptions requires the submission of a reasoned proposal from the Appointments and Remuneration Committee for analysis and approval by the Board of Directors.

Likewise, any temporary exception to the application of this Policy shall be duly recorded and explained in the corresponding Annual Directors' Remuneration Report.

9. THE RELATIONSHIP BETWEEN THE POLICY AND THE CONDITIONS OF THE COMPANY'S EMPLOYEES

The remuneration conditions for Executive Directors described in this Remuneration Policy have been established taking into account the remuneration system applicable to ACCIONA employees.

Specifically, this Remuneration Policy promotes alignment with the Company's general remuneration system, seeking in all cases to foster the commitment of all professionals to the Company, personal and corporate ethics, and the promotion of strategic and sustainable development objectives.

In this sense, the present Remuneration Policy is aligned with that of the rest of the employees, rewarding them for the value they contribute and sharing following the general principles:

- **The general remuneration system applicable to ACCIONA may be composed of fixed or variable components, or remuneration in kind and other social welfare benefits. In any case, in order to ensure the external competitiveness of all employees, remuneration is periodically reviewed against a group of comparable companies for ACCIONA.**
- **Non-discrimination on the basis of gender, age, culture, religion or race is guaranteed in the application of remuneration practices and policies. In this respect, ACCIONA professionals are remunerated in a manner consistent with their level of responsibility and leadership. This favours the retention of key professionals and the attraction of the best talent.**
- **In line with the Company's remuneration practices, a significant part of the total remuneration of the Executive Directors is variable and is tied to the achievement of predetermined, specific, quantifiable financial, sustainability and value creation targets aligned with ACCIONA's interests.**

10. CONTRIBUTION OF THE REMUNERATION POLICY TO THE STRATEGY, INTERESTS, AND LONG-TERM SUSTAINABILITY OF THE COMPANY

The remuneration system established by for the Executive Directors is designed to foster the long-term profitability and sustainability of the Company, and it includes the appropriate precautionary measures to prevent the assumption of excessive risks and to avoid rewarding poor results.

As outlined earlier, the following features of this Policy ensure that the remuneration system for ACCIONA Directors supports the achievement of the Company's strategic goals, aligns with ACCIONA's risk profile, and promotes long-term sustainability of the Company.

Remuneration Mix	The remuneration system allocates Executive Directors' compensation across various components. In cases of exceeding set objectives, this Policy introduces a new cap, limiting annual variable remuneration to 450% of annual fixed remuneration.
Pay for Performance	The remuneration structure for Executive Directors closely ties compensation to the achievement of ACCIONA's strategic objectives, fostering sustainable, long-term value creation for shareholders. As a result, fluctuations in the Company's short-term performance directly impact the extent of objective achievement and, consequently, the variable remuneration awarded to Executive Directors.
Multi-Year Framework	At the 2020 General Shareholders' Meeting, the 2020-2029 Long-Term Performance Plan (PILP) for Executive Directors was approved with 93.77% of votes in favour. Spanning ten (10) years (1 January 2020 to 31 December 2029, inclusive), this plan ensures evaluations are based on long-term outcomes, accounting for the Company and its Group's underlying economic cycle. This variable remuneration component aims to align Executive Directors' compensation with long-term shareholder value creation, while promoting their retention and motivation over the period. It aligns the interests of shareholders and Executive Directors more sustainably, given the extended maturation periods of infrastructure projects, compared to other companies' share-based remuneration plans, which often focus on medium-term goals with overlapping measurement and settlement cycles.
Assessment and Alignment with the Risk Profile	The Appointments and Remuneration Committee annually reviews the targets set for variable remuneration and submits its recommendations to the Board of Directors for final approval. The Appointments and Remuneration Committee maintains independence in its composition and deliberations, and decisions by the Board of Directors concerning Executive Directors' remuneration are made without their involvement in discussions or voting. These measures align remuneration practices with the business strategy, supporting ACCIONA's long-term profitability and sustainability while incorporating safeguards to avoid excessive risk-taking and the rewarding of unfavourable outcomes.
Incorporation of Technical Safeguards to Avoid Excessive Risk-Taking	The Policy includes the possible implementation of several technical safeguards to prevent excessive risk-taking by Executive Directors in the performance of their duties and, ultimately, ensure variable remuneration supports the Company's long-term sustainability, including: • Variable remuneration is disbursed only after the Board of Directors finalizes the financial statements, factoring in any qualifications in the auditor's report, if applicable. • Extraordinary contributions to the Saving Scheme facilitate remuneration deferral, with the potential loss of accumulated economic rights. • A one (1)-year deferral of 20% of the long-term incentive that Executive Directors are entitled to under the 2020 PILP.

- The application of reduction ('malus') and recovery ('clawback') clauses.

11. APPROVAL AND ENACTMENT

The ACCIONA Directors' Remuneration Policy shall come into force as from the effective date of its approval, if appropriate, by the General Shareholders' Meeting, and shall remain in force for the following three (3) financial years, i.e., 2026, 2027 and 2028.

With effect from the date of its approval, this Remuneration Policy shall replace and render null and void the Remuneration Policy approved by the General Shareholders' Meeting on 23 June 2022, without prejudice to the effects produced and consolidated under its validity.

The application of this Policy shall be subject, in all cases, to any amendments that the Company deems appropriate to include, in accordance with the legislation in force at any given time or ACCIONA's interpretation thereof.

Any amendment or replacement of the Policy during its term of validity shall require the prior approval of the General Shareholders' Meeting in accordance with the terms of prevailing legislation. In the event that no amendments to the Policy are proposed during this period, a new policy will be presented for approval at the 2028 General Meeting.

In any event, any remuneration received by Directors shall be in accordance with the Directors' Remuneration Policy in force at any time, except for such remuneration as has been expressly approved by the General Shareholders' Meeting.

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PERSONAL DATA PROTECTION POLICY AND GUARANTEE OF DIGITAL RIGHTS AT ACCIONA

1. INTRODUCTION

Our goal at ACCIONA is to guarantee that all areas of the company can safely and sustainably develop their activity. We are therefore committed to protecting facilities and processes and are very especially committed to safeguarding the integrity and rights of people.

In the digital society in which we live, personal data security has become one of the top priorities of organisations. That is why guaranteeing the sanctity of that information must be an indisputable objective at a global and highly interconnected company such as ours.

One of ACCIONA's principles is respect for the legislation of each one of the countries in which it operates. This means that it must adapt its information systems to the specific regulations that govern the processing of data of any person who, for whatever reason, may be related to the company, and specifically regarding the protection of their personal data. This commitment extends of the digital rights of ACCIONA's workers regarding aspects that are as important as reconciling work and family life or guaranteeing the right to privacy with respect to the use of video surveillance devices or geolocation systems.

The main purposes of this policy are to establish the company's commitment regarding personal data protection and to define a framework that allows ensuring and improving said protection, thereby respecting the principles and rights that are established in applicable regulations.

2. SCOPE OF APPLICATION

This policy must be complied with by all organisational units or companies and entities of the ACCIONA Group (defined as those over which Acciona, S.A. directly or indirectly exercises control over the capital and/or management thereof), as well as their employees, suppliers, shareholders and customers (among others), which record or process personal data.

In consortiums or joint ventures in which ACCIONA does not hold control, ACCIONA's representatives will observe the precepts of this policy and will promote the application thereof, to the extent possible.

In turn, it will be applicable in all phases of the life cycle of information that may contain personal data (generation, distribution, storage, processing, consultation and destruction).

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.

3. PRINCIPLES RELATED TO PERSONAL DATA PROTECTION

The principles assumed by ACCIONA regarding personal data protection indicate how personal data should be collected, processed, transferred and stored, as well as how the rights of data subjects are exercised, in order to ensure the right to privacy and all other fundamental rights of citizens. The principles related to personal data processing are the following:

- **Personal data should be processed legitimately, fairly and transparently.**
- **Personal data should be collected for explicit and legitimate purposes that are determined at the time of collection.**
- **Personal data should be adequate, relevant and limited to what is necessary for the purposes for which they are processed.**
- **Personal data should be accurate and always be kept up to date.**
- **Personal data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.**
- **Personal data should be processed such that the security thereof is ensured.**
- **Proactive responsibility.**

4. COMMITMENTS AND RESPONSIBILITIES REGARDING PERSONAL DATA PROTECTION

ACCIONA's commitments regarding personal data protection, which ensure compliance with the specified principles, are detailed below:

- **Compliance with applicable legal and regulatory requirements and alignment with internationally recognised standards and good practices.**
- **Driving the development and implementation of our own body of regulations, thereby establishing the bases for integrating protection in the processing of personal data in all processes of the organisation and guaranteeing respect for the rights of data subjects.**
- **Integrating personal data protection in all phases of the life cycle of information, technology systems and organisational or technological processes, therefore protecting all media that are in charge of processing, communicating or storing information.**
- **Understanding personal data protection as an integral process oriented at continuous improvement (planning, doing, verifying and acting).**
- **Developing a management model based on the criteria of legality and proportionality, and aligned with business strategies, which will allow adequate analysis and management of the risks that might affect the principles of personal data protection and therefore adopting the necessary measures for the protection thereof.**
- **Ensuring the governability of this management model by creating an organisational structure for the protection of personal data and the definition of responsibilities from a proactive approach.**

Based on the aforementioned and for the appropriate adoption of said commitments, the following responsibilities are established:

- **ACCIONA Management will require and ensure compliance with personal data protection by the entire organisation and by all people with access to personal data, including its suppliers, contractors and shareholders, among others.**
- **Every division or business unit will be responsible for implementing the necessary measures that ensure an adequate level of security within the scope of their business.**
- **Any person with access to ACCIONA information that may contain personal data, whether internal personnel or external personnel, will be bound to comply with the aspects set forth in the policy, regulations, procedures and any other document pertaining to personal data protection. A breach thereof will be subject to application of the corresponding disciplinary scheme determined by ACCIONA.**

The development of these commitments and responsibilities will allow ACCIONA to obtain the following benefits:

- **Improvement of personal data protection based on a process of continuous improvement and the availability of resources, knowledge, procedures and tools.**
- **Consolidation of trust in the organisation by customers, shareholders and suppliers, accompanied by an improved public image.**
- **Assurance of compliance with legal and ethical requirements, thus decreasing the costs resulting from a breach of personal data protection regulations, through the progressive implementation of security controls.**

PERSONAL DATA PROTECTION POLICY AND GUARANTEE OF DIGITAL RIGHTS AT ACCIONA

5. ORGANISATIONAL STRUCTURE FOR PERSONAL DATA PROTECTION

To guarantee adequate management of personal data protection, the following governing bodies are established:

- **Unit responsible for personal data protection at ACCIONA: the Personal Data Protection Department, which reports to the Legal Advising Department, will be in charge of implementing and managing the personal data protection policy, developing the body of regulations and defining – together with the heads of ICT, Corporate Security and HR – the appropriate security measures for ensuring personal data protection.**
- **Heads of personal data protection at each organisational unit or company of ACCIONA: they will be in charge of ensuring implementation of the security measures established at the organisational unit or company to which they belong in order to guarantee the security of personal data, therefore integrating personal data protection into the business processes.**

6. RIGHT TO PRIVACY AND THE USE OF DIGITAL DEVICES AT THE WORKPLACE

- **ACCIONA places ICT resources at the disposal of users who may require such resources for developing their professional activity. The use of those resources means respect for applicable legislation, respect for the principles set forth in ACCIONA's Code of Conduct and strict compliance with regulations on the use of ICT resources.**
- **ACCIONA establishes the criteria for using ICT resources placed at the disposal of users through its internal regulations on ICT resources. In any event, those regulations respect the minimum standards for the protection of user privacy in accordance with social uses and legally recognised rights.**
- **All ICT resources that the Company places at the disposal of users must be used appropriately by the same in the performance of their professional duties and tasks.**
- **The use of those resources for non-professional purposes will be limited and, in any event, must be in moderation according to the rules, restrictions or prohibitions that are specified in the internal regulations on ICT resources.**

7. RIGHT TO DISCONNECT FROM WORKPLACE

- **The digital revolution, the boom in ICT resources and both automation and globalisation processes represent a challenge and a paradigm shift in all areas, especially in labour relations.**
- **The implementation of ICT resources at the workplace should be beneficial, and this is in fact evidenced by the multiple advantages that have come about (i.e. an increase in efficiency and productivity and improved flexibility). However, a series of disadvantages have also become apparent (i.e. the risk of being permanently connected and over-exposure to information). We must weigh those disadvantages and provide a solution, or at least mitigate them.**
- **Considering the aforementioned, ACCIONA undertakes to respect and enforce respect for the right to disconnect from work.**

8. RIGHT TO PRIVACY REGARDING THE USE OF VIDEO SURVEILLANCE AND SOUND RECORDING DEVICES AT THE WORKPLACE

- **ACCIONA, within the scope of its authority, may process images through camera or video camera systems for the purpose of preserving the security of people and property, as well as its facilities, in accordance with the corresponding regulations.**

PERSONAL DATA PROTECTION POLICY AND GUARANTEE OF DIGITAL RIGHTS AT ACCIONA

- **ACCIONA will inform about the existence of video surveillance and recording devices (installed within the scope of its authority) by putting up informative signs in a sufficiently visible location, thereby identifying (at least) the existence of processing, the identity of the data controller and the possibility of exercising the rights provided for in applicable regulations.**
- **ACCIONA may process the images obtained through camera or video camera systems for the purpose of exercising its control functions over workers in accordance with legal provisions. In this case, ACCIONA will provide workers and their representatives with advance, express, clear and concise notice.**
- **In no case will the installation of sound recording or video surveillance systems be permitted, within the scope controlled by ACCIONA, in locations that are designed for worker rest or relaxation.**

9. RIGHT TO PRIVACY RELATED TO THE USE OF GEOLOCATION SYSTEMS AT THE WORKPLACE

- **ACCIONA may process the data obtained through geolocation systems for exercising supervisory functions.**
- **In advance, ACCIONA must expressly, clearly and unequivocally inform workers in accordance with legal provisions.**

10. INTERNATIONAL IMPLEMENTATION

- **The units that are responsible for data protection in each country, in coordination with the Personal Data Protection Department of Acciona, S.A., will establish the necessary internal procedures for developing and adapting the principles set forth in this Policy, in accordance with applicable local legislation at any given time.**

11. ENTRY INTO FORCE

- **This personal data protection policy will enter into force as from the publication date hereof.**

Approval by the Audit Committee 12/12/19
Modified by the Audit & Sustainability Committee 26/01/23

CYBERSECURITY POLICY

1. PURPOSE

ACCIONA considers information to be one of its most important assets, including the systems that support and process information. It has therefore established the objective of effective and efficient management of the risks to which information and information systems are subject.

This policy consequently establishes the cybersecurity principles in force at ACCIONA to ensure the protection of its information and the supporting systems thereof.

The specific objectives of this document are:

- **Define the principles that govern the management of cybersecurity at ACCIONA and according to which the group's information is protected and the cybersecurity risks to which it is exposed are mitigated. These principles will be in line with legislative and regulatory requirements in force.**
- **Define and assign the responsibilities associated with the implementation and maintenance of the cybersecurity management model.**
- **Establish a framework that facilitates decision-making related to the implementation of cybersecurity measures, both technical measures and procedural and organizational ones, in order to prevent the following impacts:**
    - Harm to the image and reputation of ACCIONA.
    - Interruption of the critical processes that support the business.
    - The loss or improper use of information assets.

2. SCOPE

This policy applies to all information assets, companies and employees of the Group, as well as to collaborators and external companies that access ACCIONA's information systems.

ACCIONA also has the obligation to ensure, under the same terms, the security of information that concerns its customers, collaborating entities and competent official bodies.

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.

3. DEVELOPMENT OF THE POLICY

The policy is complemented by a Regulatory Framework for the management of Cybersecurity, which is appropriate for responding to current and emerging threats, as well as regulatory requirements. The structure of this regulatory framework is divided into three levels:

- **First regulatory level: formed by this policy.**
- **Second regulatory level: formed by general cybersecurity standards.**
- **Third regulatory level: formed by procedures, operating manuals and technical guides.**

The Cybersecurity Regulatory Framework is reviewed regularly at least once a year, as well as after significant changes that might affect ACCIONA's cybersecurity environment and/or the circumstances of its business.

4. PRINCIPLES

- **Prevention and resilience: strengthen capabilities for protection against and the early detection of cyber threats to prevent them from having an impact on ACCIONA, and if they do have an impact, so that their effects on the business can be minimised.**
- **Participation by Senior Management: cybersecurity is assumed as a duty whose responsibility is exercised beginning at the organization's highest hierarchical level, wherefore the Management Committee assumes the commitment to ensure implementation of the cybersecurity management system that allows putting what is defined in this document into practice.**
- **Shared responsibility: cybersecurity is a duty that requires the full cooperation of all personnel at ACCIONA, regarding not only compliance with the established standards and procedures that expressly concern them, but also any collaboration that might be occasionally required by the functional managers of cybersecurity.**
- **Training: an adequate level of training and awareness is deemed to be one of the indispensable cornerstones for the correct management of cybersecurity. ACCIONA therefore promotes a culture of cybersecurity through training actions targeted at all employees and stakeholders who are involved. Likewise, it guarantees that cybersecurity teams have the knowledge, experience and technological capability for complying with ACCIONA's cybersecurity objectives.**
- **Regulatory compliance: compliance with applicable laws and regulations related to cybersecurity in all countries where ACCIONA operates must be ensured. Likewise, ACCIONA collaborates with all competent authorities and agencies in order to contribute to the improvement of cybersecurity.**

5. ORGANIZATION OF CYBERSECURITY

The Cybersecurity Management Committee is ultimately responsible for cybersecurity at ACCIONA, and it delegates the execution of this function to the Cybersecurity Director. This person reports hierarchically to the Director of Information Systems and the Director of Corporate Security. This ensures that the technical controls for which Technology and Processes Directorate is responsible are consistent and converge with the physical and personnel controls for which the Corporate Security Area is responsible.

The mission of Cybersecurity Directorate is to effectively and efficiently manage the Group's information assets, thereby seeking to ensure the viability of the business and taking charge of furthering the organization of cybersecurity defined in this policy.

The Cybersecurity Management Committee is responsible for promoting and supporting the establishment of technical, organizational and control measures that guarantee the integrity, availability and confidentiality of information, within a general framework to manage cybersecurity risks. This makes therefore such measures compatible with the necessary transmission of information and knowledge among the various organizational areas of ACCIONA.

For coordination purposes, there are different operational Cybersecurity Committees, in which the main cybersecurity managers of the different areas, functions, companies or territories that may be determined in each case participate.

Without prejudice to the preceding, every ACCIONA employee is responsible for complying with cybersecurity requirements when performing their duties, such that there is shared co-responsibility among employees, executives, collaborators and the cybersecurity organization.

6. AUDITING

Audits are periodically conducted, whether total or partial, with the objective of verifying the level of compliance with what is defined in ACCIONA's Cybersecurity Regulatory Framework.

7. VALIDITY AND REVISIONS

This policy will enter into force on the next business day following the approval hereof by the ACCIONA Cybersecurity Management Committee. It will remain in force as long as it is not amended or revoked by a subsequent policy.

Any exceptions to the provisions set forth in this policy will be dealt with and approved by the ACCIONA Cybersecurity Management Committee.

As from the entry into force hereof, a period of three months is provided for adapting the incompatibilities of the provisions set forth in this document to those that could exist in other standards, both global and local.

This document will be revised not only periodically but also according to the organizational, legal or business changes that could occur at any given time in order to maintain its pertinence, sufficiency and efficacy. If changes are made to the document, they will be communicated and published in the Cybersecurity space of ACCIONA's Intranet (InterACCIONA).

This policy is available on the Intranet (InterACCIONA) to all employees and on the corporate website to all stakeholders of the company.

This policy will come into force on the next business day following its approval by the Audit and Sustainability Committee of the Board of Directors of ACCIONA, SA. It shall remain in force until it is modified or repealed by a subsequent policy.

Exceptions to the provisions of this policy will be dealt with and approved by the Audit and Sustainability Committee of the Board of Directors of ACCIONA, SA at the proposal of ACCIONA's Cybersecurity Management Committee.

December 16, 2022

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.**

Management Team
April, 24 2023

Audit and Sustainability Committee
July 20, 2023

POLICY BOOK