

JULY 2025

SUSTAINABILITY REPORT

FIRST SEMESTER 2025

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1 . ABOUT THIS REPORT

ACCIONA's Sustainability Report for the first half of 2025 provides an update focused on data and progress in sustainability, reflecting the company's ongoing commitment to responsible management and a positive impact on people and the planet. The scope of the report covers the activities of ACCIONA, S.A. and its operating subsidiaries in the countries where the company is present during the period from January to June 2025.

This report is intended for investors, clients, and other stakeholders interested in learning about the progress on environmental, social, and governance objectives. In addition to key indicators, the report highlights ACCIONA's commitment through success stories that showcase the effective implementation of projects across different businesses and geographies.

KEY MILESTONES

- Throughout the first six months of the year, aligned CAPEX (over eligible CAPEX) with the EU Taxonomy criteria for mitigation and adaptation reached 98,2%.
- ATLAS, a prototype of an interactive sustainability reporting platform, was developed. It enables the visualization of the company's local and global impact at a granular level, allows exploration of data linked to the Sustainability Master Plan, and facilitates access to clear and strategic information.
- During ACCIONA's General Shareholders' Meeting, held on June 26, the new ACCIONA 2024 Integrated Report was published, combining the company's sustainability and financial strategies in a single document.
- As of the end of the first half of 2025, 80% of ACCIONA Group's gross corporate debt is categorized as Green (69%) and Sustainability-linked (11%).
- Between March and June, 31 ACCIONA professionals participated in the Xponential Leaders program, focused on defining the strategy for the future 2030 Sustainability Master Plan.
- ACCIONA and ACCIONA Energía are ranked among Europe's 50 most sustainable companies, according to the Europe Sustainability Leaders 2025 report by Corporate Knights, the leading sustainability research and ranking media group.
- In addition, in January 2025, the same sustainability-focused ranking group selected ACCIONA and its subsidiary Nordex among the 100 most sustainable companies in the world, in the 2025 Global 100 Most Sustainable Corporations ranking.

Explore how ACCIONA is making a difference in:

- PEOPLE: a platform for reflection and dialogue aimed at driving real cultural change within organizations by exploring key questions to help build inclusive environments that embrace diversity and individual uniqueness.
- I'MNOVATION #HUB: a platform created by ACCIONA to share information about technological innovation, particularly in areas like renewable energy, water management, and digital transformation.
- SUSTAINABILITY FOR ALL: ACCIONA's public content platform dedicated to sustainability and climate action. It operates as a global community where users can learn about and share best practices, explore in-depth stories, data, and reflections on topics such as renewable energy, regenerative agriculture, social innovation, green tech, biodiversity, and more.

2. EVOLUTION OF THE MAIN INDICATORS

	Unity	1S 2024	1S 2025	Δ 2024/2025
Total workforce	Full Time Equivalent	64,570	67,847	5.08%
Women in managerial and executive positions	Number	23.10	22.93	- 0.17pp
Workforce with disabilities in Spain	%	4.47	4.15	-0.32pp
Accident frequency rate for own employees and subcontractors	Number	1.44	1.37	-4.86%
Fatalities of own employees	Number	0	0	N/A
Fatalities of subcontractors	Number	0	1	N/A
Projects with Social Impact Management (GIS)	Number	251 ¹	264	5.18%
Volunteer	hours	10,904	16,070	47.38%
CAPEX aligned with the European taxonomy of sustainable activities	%	99	98	-1pp
Renewable energy production	GWh	13,441	13,621	1.34%
Avoided emissions	million tCO ₂ e	7.23	7.55	4.43%
GHG emissions scope 1+2	tCO ₂ e	123,704	160,063	29.39%
Weighted average carbon intensity	tCO ₂ /M€ turnover	14.12	18.19	28.83%
Water consumption	hm ³	3.17	3.81	20.19%
Water production in water-stressed areas	hm ³	634	453	-28.55%
Consumption of renewable and recycled resources	%	8.56	24.57	16.01pp
Waste destined for landfill	Kt	625	412	-34.08%
Percentage of waste recovery	%	90.61	95.20	4.59pp
Total voluntary plantings	Number of trees	94,502	156,868	65.98%
Female Directors on the Board of Directors	%	41.66	41.66	-
Total suppliers with active purchases	Number	26,700	20,618	-22.8%
Audited strategic suppliers	% ²	89.00	82.6	-7.20pp
No Go Suppliers	Number	189	382	102%
Communications in the ethical channel	Number	155	266 ³	N/A
Third party due diligence process	Number	200	145	27.5%
Sustainable financing	% ⁴	80	80	-
Open disputes	Number	0	0	-

¹ Modification of the project quantification criterion for those applying the GIS methodology at ACCIONA Energía, in order to better reflect its operational reality. The figure reported for 2024 has been updated to 251 projects, instead of 272.

² Audited suppliers / strategic suppliers.

³ Unlike last year, this figure includes communications from Nordex.

⁴ Sustainable financing / total debt in the period.

3. ENVIRONMENTAL

CLIMATE CHANGE

RENEWABLE GENERATION AND AVOIDED EMISSIONS

ACCIONA Energía's renewable energy production increased by 1.34% in this semester compared to the first half of the previous year. This growth is mainly due to greater installed capacity in Australia and the United States, which offset the drop in production in Spain caused by the sale of hydroelectric assets.

This increase in production, entirely from renewable sources, has helped avoid the emission of 7,545,559 tonnes of CO₂ into the atmosphere.

Division	Business	Scope 1 (Tm CO ₂ e)	Scope 2 (Tm CO ₂ e)
Infrastructure	Construction and Industrial	84,470	18,573
	Water	3,878	830
	ASUMA	6,157	45
	Concessions	50	722
Total Infrastructure		94,555	20,171
ACCIONA Energía	ACCIONA Energía	5,139	14,215
Nordex	Nordex	18,786	2,696
Other businesses	ACCIONA Facility Services	1,513	362
	ACCIONA HealthCare	335	0
	ACCIONA Airports	1,751	0
	Logistics	0	0
	Living	24	21
	Culture	9	2
	Forwarding	22	0
	Silence	303	68

Mobility	44	0
Other	46	2
Total other business	4,047	454
TOTAL	122,527	37,536
EMISIONES DE GASES DE EFECTO INVERNADERO PROPIAS		

There has been a 29% increase in emissions compared to the same period of the previous year, attributable to three main factors:

- **Increased activity in emission-intensive construction works in Chile:** In 2025, projects in the mining sector at Talabre and Caren have entered phases involving intensive use of high diesel-consuming machinery. These works accounted for 30% of CO₂e emissions in the Construction business during the first half of the year.
- **Waste combustion at Kwinana Waste to Energy:** In Australia, the commissioning of the Kwinana Waste to Energy plant involves the combustion of fossil-origin waste, which generates emissions. This plant has been responsible for over 40% of CO₂e emissions in the Construction business in the first half of the year.

Scope 2 emissions can be offset with certificates such as I-RECs or similar instruments. The company offsets part of its emissions using these instruments at year-end. The company offsets part of its emissions using these instruments at year-end, which will result in a significant reduction.

| DECARBONIZATION FUND

In 2025, a total of 14 initiatives were selected for funding through the Decarbonization Fund, with a potential emissions reduction of nearly 5,000 tCO₂e/year.

Funding for decarbonization initiatives through the Fund is awarded via an internal competitive process. In the first phase, a selection committee prioritizes proposals based on their impact and cost-effectiveness. Subsequently, a committee composed of senior management members determines the allocation of funds to the projects with the greatest potential.

During the first half of the year, the fifth edition of the Decarbonization Fund was also launched, opening a call for proposals to be financed by the Fund in 2026.

ALIGNMENT WITH THE EUROPEAN TAXONOMY OF SUSTAINABLE ACTIVITIES

Delegated Regulation (EU) 2021/2139 + 2023/2485 + 2023/2486

		S1 2024			S1 2025		
		TOTAL	ELIGIBLE (OUT OF TOTAL NUMBER)	ALIGNED (ON ELIGIBLE FIGURE)	TOTAL	ELIGIBLE (OUT OF TOTAL NUMBER)	ALIGNED (ON ELIGIBLE FIGURE)
CAPEX	%	N/A	48%	99%	N/A	76.2%	98.2%
	M€	1,452	692	688	880	671	659
OPEX	%	N/A	59%	85%	N/A	63.0%	84.0%
	M€	191	112	95	183	115	97
REVENUE	%	N/A	65%	88%	N/A	67.5%	88.7%
	M€	7,102	4,636	4,067	7,333	4,950	4,392

W A T E R

During this semester, water consumption increased by 20.2% compared to the first half of the previous year, largely due to greater water usage in treatment processes at plants such as Gabal El Asfar (Egypt).

Potable water production decreased by 40% compared to the beginning of the previous year, mainly due to the cessation of operations at desalination plants such as Torrevieja (Spain) and Al-Khobar and Jubail 3B (Saudi Arabia). Of the total potable water produced, 77% came from countries experiencing water stress.

London, United Kingdom → **International Recognition in Water Management**

ACCIONA has been honored at the prestigious [Global Water Intelligence](#) (GWI) awards, held in London, for its excellence in developing sustainable water infrastructure on a global scale.

The company received two major accolades: Water Company of the Year (finalist) and Desalination Plant of the Year for the Tseung Kwan O plant in Hong Kong, a technological and environmental benchmark in reverse osmosis desalination.

These recognitions highlight ACCIONA's commitment to innovation, energy efficiency, and climate resilience in its water projects, which benefit over 100 million people across 30 countries.

The GWI Awards are a global benchmark in the sector, spotlighting initiatives that drive transformative solutions in the full water cycle.

[Learn more about the Tseung Kwan O project on ATLAS.](#)

World Water Day → **Raising awareness for the responsible use of our most vital resource**

To mark World Water Day, ACCIONA launched a global awareness campaign to promote the conscious and sustainable use of water—one of the most threatened resources due to climate change and human pressure.

Under the slogan “Don’t Take Water for Granted,” the initiative featured a series of audiovisual pieces, digital actions, and educational materials encouraging reflection on the value of water in daily life and the balance of ecosystems. The campaign highlights the urgency of adopting responsible habits, both individually and collectively.

Present in over 15 countries and in multiple languages, the campaign reinforces ACCIONA's commitment to efficient and regenerative water cycle management, aligned with the Sustainable Development Goals (SDGs). As a key player in the development of water infrastructure, the company promotes solutions that ensure universal access to this essential resource without compromising its future availability.

B I O D I V E R S I T Y

In the first half of 2025, the number of voluntary trees planted has grown significantly by 65.98% compared to the same period last year, reaching a total of 156,868 trees planted during this semester.

Antarctica → **Female Leadership for Biodiversity Protection**

In January and February 2025, the *Homeward Bound 8* expedition—supported by ACCIONA—traveled across Antarctica with 124 women from STEMM fields and 22 nationalities, on a journey that combined female leadership with environmental conservation.

Over the course of two weeks, participants explored one of the planet's most fragile ecosystems, engaging in training sessions and collaborative work focused on solutions to climate change and biodiversity loss. The experience highlighted the importance of protecting critical environments like Antarctica, whose health is vital to the planet's balance.

Aligned with the Sustainable Development Goals (SDGs), the program placed a strong emphasis on developing environmentally conscious leaders with the ability to influence change. As a company committed to nature regeneration, ACCIONA promoted this initiative to empower women in decision-making processes that directly impact global ecosystems.

Gijón → 3D Innovation to Regenerate Marine Biodiversity

ACCIONA has successfully developed and tested a new type of 3D-printed concrete in Gijón, designed to promote the regeneration of marine ecosystems, in collaboration with the Spanish Institute of Oceanography and the University of Cantabria.

The structures, installed at the port of El Musel, replicate natural shapes and textures that facilitate the settlement of species such as algae, mollusks, and crustaceans. This biomimetic approach creates artificial habitats that strengthen local biodiversity and help restore environments degraded by human activity.

The project, aligned with the Sustainable Development Goals, combines advanced engineering and environmental commitment, marking a decisive step toward more resilient and marine-friendly infrastructure.

C I R C U L A R I T Y

In terms of landfill waste, the figure has decreased by 34.1%. This reduction is mainly due to lower landfill disposal from projects such as the [Estrellín quarry \(Spain\)](#). Of the total waste generated by the company, 90% comes from excavated soil and construction debris. During the first half of the year, excavation work continued on [São Paulo Metro Line 6](#), generating approximately 1.32 Mt of soil, all of which was recovered.

Hazardous waste generation, however, was nearly four times higher than in the same period last year. This increase is primarily linked to the handling of materials containing asbestos as part of construction activities. Nevertheless, the total amount of hazardous waste generated was 131 Kt, representing less than 1.5% of the company's total waste.

The overall waste recovery rate rose by 5 percentage points compared to the first half of 2024, reaching 95% this semester.

The share of recycled or renewable resources consumed by the company increased by 16 percentage points, mainly due to greater use of reused soil, particularly in projects in Oceania. Total resource consumption in the first half of 2025 stood at 5.84 Mt, representing a 6% decrease compared to the same period in 2024.

Palma de Mallorca, Spain → **Emission reduction (tCO₂) through low-carbon circular steel**

ACCIONA and AENA have reached an agreement to use low-carbon circular steel in the renovation and expansion works of Son Sant Joan Airport in Palma de Mallorca, a project awarded to ACCIONA in 2023. Approximately 7,000 tonnes of rebar steel—one of the main construction materials—will be used.

As part of its sustainability commitment, ACCIONA established the supplier's ability to provide low-emission steel as a key selection criterion. CELSA Group was chosen as the supplier and will produce the steel from ferrous scrap recovered during the demolition of the old terminal.

The production process consists of several stages, and the steel will ultimately be integrated into the reinforced concrete structure of the new terminal.

This model achieves two fundamental goals:

1. Promoting material circularity, by reincorporating waste from the airport itself into its new infrastructure.
2. Reducing CO₂ emissions by more than 40% compared to the average of similar plants in Spain—avoiding over 1,900 tonnes of CO₂ equivalent compared to conventional steel use.

[Learn more about the Palma airport expansion project on ATLAS.](#)

Miajadas → Circular innovation in infrastructure: using solid biomass waste in civil works

ACCIONA Energía has developed an innovative process to reuse biomass slag—a solid by-product from its plants—as base and sub-base material in roads and logistics platforms. This solution, validated in collaboration with the Construction division, enhances the mechanical properties of soil by mixing the slag with quicklime, allowing it to be used even on clay-rich or low-performance terrain.

Since the first trials four years ago, over 5,000 tonnes of slag have been recovered and applied in real projects such as the Celada wind farm, the A-68 highway, and the Logrosán plant's storage platform, helping to reduce natural aggregate extraction and the carbon footprint of construction processes.

The project has resulted in a patent application and represents a major step forward in industrial circularity—demonstrating how waste can be transformed into raw material for new infrastructure without compromising quality or execution timelines.

[Learn more about the Miajadas project on ATLAS.](#)

4 . S O C I A L

A C C I O N A T E A M

ACCIONA closes First Half of 2025 with 67,847 employees, up 5.1% year-on-year. As of the end of the first half of 2025, ACCIONA's workforce totals 67,847 employees, representing an increase of nearly 5.1% compared to the same period last year. Of the total workforce, 27.97% are women.

The company comprises 166 nationalities and operates in over 60 countries. Spain recorded the largest year-on-year increase, with 1,297 new employees, driven by diverse projects such as the Bilbao Sewerage Network, Valencia Port Redevelopment, S04 Production, A5 Underground Bypass in Madrid, and the Data Center in Aragón.

In Mexico, the workforce grew by 437 employees, mainly due to services provided to Stellantis and Navistar. In Australia, the increase of 395 employees was concentrated in major infrastructure projects such as the Western Harbour Tunnel, M80 Ring Road, and ongoing construction of the Alkimos desalination plant.

At Nordex, the workforce grew by 649 employees year-on-year, mainly in India, Finland, and Germany, driven by growth in blade manufacturing operations.

| DIVERSITY

The increase in the workforce has coincided with a 0.17 percentage point decrease compared to the first half of 2024, and the percentage of employees with disabilities stands at 4.15% of the total workforce in Spain.

| HEALTH AND SAFETY

The accident frequency rate for own employees and subcontractors has decreased by 4.86 % to 1.37. This variation is mainly influenced by a reduction in accidents in the construction line thanks to the efforts and campaigns carried out throughout the year

EMPLOYEE HEALTH AND WELLNESS PROGRAM

Global Health and Wellbeing Program: Nutrition and Emotional Balance Campaigns
ACCIONA's Health and Wellbeing Program has launched two major global campaigns focused on promoting healthy nutrition and emotional balance.

- Healthy nutrition: This campaign encourages a balanced diet based on local and sustainably grown food. Since the program's launch in 2023, 10 Engagement Points have been held with nutrition specialists, reaching 4,775 employees.
- Emotional balance: This campaign addresses topics such as stress management and social relationships, offering tools for effective emotional regulation. Since 2023, 8 Engagement Points have been conducted, reaching 3,382 employees. These sessions have been complemented by mindfulness workshops led by professional psychologists.

All Engagement points are available in spanish, english, and portuguese, both in-person and online.

SOCIAL SAFEGUARDS

ACCIONA has a procedure and an integrated system for risk assessment and management of compliance with social safeguards. The Social Safeguards Internal Control System (SCISS) is based on the internal control models developed by the COSO *Committee of Sponsoring Organizations of the Treadway Commission*, and on the Company's combined assurance methodology based on the three lines of defence model.

The Social Safeguards Internal Control System aims to promote and consolidate a true culture of compliance and respect for both current legislation and international human rights standards and principles.

SOCIAL IMPACT MANAGEMENT

For over a decade, ACCIONA has implemented a Social Impact Management (SIM) methodology, designed to identify, analyze, and manage both the intended and unintended social consequences—positive or negative—of a project's development in a given community. It also guides engagement with local communities and other stakeholders.

In the first half of 2025, the SIM methodology was applied in 264 projects worldwide, representing a 5.18% increase compared to the same period in 2024.

In a context of critical review and evolution of its community intervention model, ACCIONA launched the Social Function framework in 2024 as a way to enhance and expand the SIM methodology. This new approach, developed under the umbrella of the *Sociedad+* strategy, adopts a more proactive stance focused on creating opportunities and shared value in the territories where ACCIONA operates. It positions the project itself as a catalyst for territorial transformation, aligning social sustainability with business models and reinforcing the company's regenerative commitment.

In the first half of 2025, the Social Function framework was applied across various Infrastructure, Energy, AFS, and Living & Culture projects, with support from the Social Innovation Lab to local Social Sustainability teams. This experimental phase enabled the validation of tools and shared operational methodologies, laying the foundation for progressive global integration and consolidating a community engagement model aimed at leaving a positive and lasting legacy.

International → **Validation of the Social Function in projects**

The support provided by the Social Innovation Laboratory has enabled the testing of a new social intervention model in real projects, aligned with long-term sustainability and business value. Developed together with local, project, and business teams, and incorporating key cross-functional areas in the design and execution of the projects, these processes have facilitated the integration of the social dimension by generating contextualized, operationally viable solutions fully aligned with the technical and functional logic of each project.

For example, in Morocco, early work around the Casablanca desalination plant (Water business) has connected local needs with project-specific opportunities, promoting youth employment initiatives and strengthening women seaweed gatherers. At the Hospital del Niño

in Panama (Construction business), the activation of an internal coordination table between foundations and medical staff is generating a collaborative social management model directly from the project site. In projects within the Construction and Concessions businesses, such as the SR400 (Atlanta, USA) or the expansion of Metro Line 6 in São Paulo (Brazil), work is being done from the early stages to transform the infrastructure into development hubs (Opportunity Hubs), connecting the project with urban, economic, and social plans of the territory, and identifying lines of intervention that reflect local cultural capital, reinforce existing productive identities, and facilitate their appropriation by community stakeholders.

These cases demonstrate that intentionally, locally, and strategically incorporating the social dimension directly contributes to the unique value of the projects ACCIONA develops in the territories.

+ Learn more about the [Casablanca](#), [Hospital del Niño](#), [Line 6](#) projects in ATLAS.

PROJECT VOLUNTEERING

VOLUNTEERING PROGRAM

It promotes employee participation with the aim of encouraging local volunteering and supporting the communities where ACCIONA carries out its projects, thereby increasing the positive impact on society and its environment.

In the first half of the year, 4,109 volunteers dedicated 16,070 hours to various initiatives, such as projects for access to energy, water, and sanitation; support for university students; labor integration of women in vulnerable situations; education on the Sustainable Development Goals; beach cleanups; recycling; reforestation; donations; and awareness-raising, benefiting more than 25,600 people.

Internacional → More than 600 ACCIONA Volunteers mobilize in 16 countries to promote the SDGs among over 11,600 students

On the occasion of Volunteer Day, more than 600 ACCIONA employees took part in a global training initiative aimed at raising awareness among children about sustainable development and the United Nations Sustainable Development Goals (SDGs). Through educational sessions delivered by the volunteers themselves, the initiative reached over 11,600 children aged 6 to 10 across more than 100 schools in 16 countries: Brazil, Mexico, Peru, Chile, Panama, Ecuador, the Dominican Republic, Italy, Poland, Portugal, the United Kingdom, Australia, the United States, Qatar, Canada, and Spain.

In several countries, including Mexico, Brazil, and Panama, the day was further enriched with high-impact local initiatives, such as:

- Book and toy donation drives for schools.
- Creation of urban gardens.
- Recycling campaigns and environmental education activities.

- Improvements to school infrastructure.
- Community-participation reforestation activities.

Valencia, Spain → **ACCIONA volunteers participate in a mentoring program for young people affected by the DANA storm**

ACCIONA volunteers took part in the “Muévete X Valencia” initiative, aimed at supporting young people affected by the DANA storm. This initiative is led by the Princess of Girona Foundation and is part of the Special Intervention Plan for young people in Valencia aged between 16 and 22.

Twelve company employees participated in a group mentoring session, as well as individual coaching sessions, with the goal of strengthening the psychological well-being of the affected youth. They also provided personalized training and support, focusing on vocational development through key skills such as self-awareness, creativity, and relationship management.

| VOLUNTEERING AT ACCIONA.ORG

During the first half of 2025, the acciona.org Foundation benefited from the collaboration of ACCIONA employees who contributed their knowledge and professional experience from their workplaces thanks to the remote volunteering initiative launched in 2024.

Additionally, on Volunteer Day 2025, the Foundation promoted the participation of 25 company volunteers in an activity held in Mexico as part of this initiative. The activity involved reforesting the area surrounding a local water source with native species, with the aim of restoring ecological balance, regenerating soil, and promoting local biodiversity. Volunteers also delivered a sustainability workshop at a school in a community supported by one of the development cooperation projects.

5 . G O V E R N A N C E

ACCIONA’s Board of Directors achieved, in the first half of the previous year, the goal set out in the Sustainability Master Plan (SMP) of reaching over 40% female representation before 2025, attaining a gender diversity rate of 41.66%, which it has maintained to date.

S U P P L I E R P A R T N E R S H I P

During the first half of the year, ACCIONA saw a 22,8% decrease in the number of suppliers with active purchases, reaching a total of 20,618. This is due to the changing needs of the businesses and the progress of projects, maintaining a similar number of contracts to last year.

Regarding suppliers classified as Non-Go, those who have failed to resolve Serious Non-Conformities (SNCs) identified in audits within the established deadlines or who have not implemented effective action plans, have increased by 102%, reaching 382. The number of NoGo suppliers has increased due to an analysis carried out by the team in Australia, which resulted in the blocking of 139 suppliers due to business closure and insolvency.

The following progress has been made with a considerable impact on the sustainability of the supply chain:

- Review of the Audit Protocol and new action protocol for conflict minerals and forced labor in China.
- Development of Improvement Plans for 100% of suppliers with identified risks and first draft of the action protocol.
- Update of the ESG risk matrix in the Supply Chain, based on suppliers' country and activity, and aligned with the corporate ESG risk matrix.
- Enhancement of the system in terms of Good Governance (as a continuation of the Social Safeguards implemented in 2023), through a project that reviewed the KO criteria of the Supplier Risk Map.
- A Cybersecurity assessment has been added to all supplier qualification DDR processes, and Action and Improvement Plans have been established for suppliers in coordination with the corporate areas of Compliance, Data Protection, and Cybersecurity.

ETHICS AND ANTI - CORRUPTION

Through ACCIONA Group's various Ethics Channels, a total of 266 reports were received in the first half of 2025, representing a 71.6% increase compared to the same period in 2024. This rise is mainly due to the inclusion of data from Nordex, as well as improved awareness of and trust in these channels.

For its part, in relation to the due diligence process for third parties -non-suppliers- of the ACCIONA Group, 145 files were analyzed and approved in the first half of 2025, representing an increase of 27.5% compared to the figures recorded in the first half of 2024. This increase is due to improved knowledge of the due diligence processes required in the framework of business opportunity approvals.

6 . S U S T A I N A B L E F I N A N C E

ACCIONA's [sustainable financing strategy](#) is designed to contribute to the Group's commitment to leading the transition to a low-carbon economy. **ACCIONA's Sustainable Impact Financing Framework** encompasses both green financing and sustainability-linked instruments and introduces a new Local Impact feature that combined with either of the two

traditional instruments mentioned above, gives rise to a new "Double Impact" structure. Under this Framework, four different types of financing structures can be issued:

| S U S T A I N A B L E F I N A N C I N G S

The following table reflects the new instruments issued in the first half of 2025 as well as the total outstanding amounts.

Type of Financing		Instruments 2025 (#)	Total Instruments (#)	Amount 2025 (€M)	Total Amount (€M)
Green Financing	Type I	15	81	442	5,296
	Type II	5	19	1,441	3,807
Sustainability- linked Financing	Type III	0	0	0	0
	Type IV	5	18	1,225	3,282
Total		25	115	3,108	12,385

With the inclusion of its innovative elements, the Sustainable Financing Framework has aroused much interest in the market and has reinforced ACCIONA's position as a leading company in the sustainable debt market. At the end of the first half of 2024, 80% of the company's gross corporate debt is categorized as Green (69 %) or sustainability-linked (11 %).

| E S G E X T E R N A L R A T I N G S

ACCIONA y ACCIONA Energía are periodically evaluated by ESG ratings, consistently standing out as leaders in their sector. The scores from the main rating agencies at the end of the first half of 2024 are the following:

Rating agency	Rating Scale	ACCIONA			ACCIONA ENERGÍA		
		Score	Ind. Average	Industry	Score	Ind. Average	Industry
	0 a 100	85	34	Utilities	87	34	Utilities
	D- a A	A -	C	General	A -	C	Utilities
	100 a 0	16.2 Low Risk	35 High Risk	Utilities	9.3 Low Risk	25 Med Risk	Utilities
	CCC a AAA	AA	A	Utilities	AAA	A	Utilities
	D- a A+	C+ Prime	D+	Construction	A - Prime	B	Renewable Electricity
		85 Platinum	n/a	HeavyRoads and Railways Construction	82 Platinum	n/a	Electricity, gas, steam, and a.c

| SUSTAINABILITY INDEXES PRESENCE

ACCIONA is included in several sustainability stock market indexes that include leading companies in this field.

Supplier	Index Name
Bloomberg	Bloomberg ESG Data Index Bloomberg ESG Score Deep History Index Bloomberg ESG Total Coverage Inde Bloomberg Goldman Sachs Global Clean Energy Index Price Return
 SOLACTIVE German Index Engineering	Solactive Clean Energy Index NTR Solactive Corner European Family Owned ESG Company Index NTR Solactive ISS ESG Screened Europe Small Cap Index NTR Solactive Candriam Factors Sustainable Europe Equity Index Solactive European Renewables Stock NTR Index
 SUSTAINALYTICS	Morningstar Eurozone Sustainability NR EUR
 EURONEXT	Euronext Eurozone ESG Large 80 Euronext Vigeo Europe 120 Index Euronext Low Carbon 200 Eurozone Pab NR
 NASDAQ OMX	NASDAQ OMX Green Economy Index NASDAQ OMX Green Economy Europe USD
 foxberry index management	Foxberry SMS Global Sustainable Infrastructure USD Net Total Return Index
J.P.Morgan	J.P. Morgan QUEST Renewable Energy Index
 MSCI	MSCI World Custom ESG Climate Series A Net in EUR
 KAYNE ANDERSON	Kayne Anderson Renewable Infrastructure Index
 WilderHill Clean Energy Index®	WilderHill Wind Energy Index (USD NTR)

7 . A N N E X

| LEVEL OF ASSURANCE OF INDICATORS

GRI STANDARD	CONTENTS	PAGES	TYPE OF INSURANCE
SOCIAL			
GRI 2-7	Total workforce (FTE)	4;11	Limited
GRI 405-1	Women in the workforce (no.)	11	Assured annually
GRI 405-1	Women in managerial and executive positions (%)	4;11	Limited
GRI 405-1	Workforce with disabilities in Spain (%)	4;11	Limited
GRI 405-1	Nationalities in the workforce (no.)	11	Assured annually
GRI 403-9	Accident frequency rate for own employees and subcontractors	4; 11	Assured annually
GRI 403-9	Fatalities	4	Assured annually
GRI 413-1	Projects with Social Impact Management - GIS (no.)	4	Limited
GRI 413-1	Volunteers (no.)	4	Assured annually
GRI 413-1	Volunteer hours	4; 13	Assured annually
ENVIRONMENTAL			
GRI 302-1	Renewable energy production (GWh)	4; 5	Limited
GRI 305-5	Avoided emissions (tCO ₂ e)	4; 5	Limited
GRI 305-1, 305-2	GHG emissions scope 1+2 (tCO ₂ e)	4; 5; 6	Limited
GRI 305-4	Weighted average carbon intensity (t CO ₂ /M€ turnover)	4; 5; 6	N/A
GRI 303-5	Water consumption (hm ³)	4	Limited
GRI 303-1	Water production (hm ³)	4; 7	Assured annually
GRI 303-1	Water production in water-stressed countries (m ³)	4; 7	Assured annually
GRI 301-2	Consumption of renewable and recycled resources (%)	4; 16	Limited
GRI 306-5	Waste destined for landfill (KtM tonnes)	4; 16	Limited
GRI 306-4	Waste recovery rate (%)	4; 16	Limited
GRI 304-3	Voluntary plantings Total (no. trees)	4; 8	Assured annually
GOVERNANCE			
GRI 405-1	Female Directors on the Board of Directors (%)	4; 15	N/A
GRI 204-1	Total suppliers with active purchases (no.)	4; 15	Assured annually

GRI 308-1, 414-1	Audited strategic suppliers (%)	4; 15	Assured annually
GRI 308-2, 414-2	No Go Suppliers (nº)	4; 15	Assured annually
GRI 2-16	Communications in the ethical channel (no.)	4; 15	Assured annually
GRI 308-2, 414-2	Third party due diligence process (no.)	4;15	Assured annually
GRI 201-2	Green Finance	2; 4; 16	Limited
GRI 201-2	Corporate Finance with sustainable commitments	2; 4 ;16	Limited
GRI 419-1	Open disputes (no.)	4	Assured annually

TAXONOMICS

Regulation (EU) 2020/852	CapEx aligned with the European taxonomy of sustainable activities (%)	2; 4; 7	Limited
Regulation (EU) 2020/852	Opex aligned to European taxonomy of sustainable activities (%)	2; 4; 7	Limited
Regulation (EU) 2020/852	Sales aligned with the European taxonomy of sustainable activities (%)	2; 4; 7	Limited



ACCIONA, S.A. and subsidiaries

Independent Limited Assurance Report on the
Sustainability Report for the First Half of 2025

30 June 2025

*(Translation from the original in Spanish. In the
event of discrepancy, the Spanish-language version
prevails.)*



KPMG Asesores, S.L.U.
Pº de la Castellana, 259 C
28046 Madrid

Independent Limited Assurance Report on the Sustainability Report of ACCIONA, S.A. and subsidiaries

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the shareholders of ACCIONA, S.A.:

Pursuant to our engagement letter of 4 July 2025, we have performed an independent limited assurance review of the accompanying Sustainability Report for the First Half of 2025 (hereinafter the Report) of Acciona, S.A. (hereinafter the Parent or ACCIONA) and subsidiaries (hereinafter the Group or ACCIONA Group), at 30 June 2025.

The ACCIONA Group's Sustainability Report for the First Half of 2025 includes additional information to that required by GRI standards and prevailing mercantile legislation concerning non-financial information, which has not been the subject of our limited assurance work. Our work was limited exclusively to providing assurance on the information contained in the "Level of assurance of the indicators" Appendix table, included in the accompanying Report.

Responsibilities of ACCIONA, S.A.

Management of the Parent is responsible for the preparation of the Sustainability Report for the First Half of 2025 in accordance with the GRI standards.

This responsibility also encompasses the design, implementation and maintenance of relevant internal control to ensure that the Sustainability Report for the First Half of 2025 is free from material misstatement, whether due to fraud or error.

Management of the Parent is also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the Sustainability Report for the First Half of 2025 was obtained.

Our Responsibilities

Our responsibility consists of examining the Sustainability Report for the First Half of 2025 prepared by Acciona, S.A. and reporting thereon in the form of an independent limited assurance conclusion based on the evidence obtained. We conducted our engagement in accordance with ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB). This standard requires that we plan and execute our procedures to obtain limited assurance on whether the Sustainability Report for the First Half of 2025 has been prepared, in all material respects, in accordance with the GRI standards.

Our firm applies International Standard on Quality Management 1 (ISQM 1), which requires us to design, implement and operate a system of quality management, including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Procedures Applied

The procedures selected depend on our knowledge of the ACCIONA Group's Sustainability Report for the First Half of 2025 and other circumstances of the engagement, and our consideration of areas where it is probable that material misstatements will arise.

Our work consisted of making inquiries of management, as well as of the different units and areas of the Group that participated in the preparation of the Sustainability Report for the First Half of 2025, reviewing the processes for compiling and validating the information presented in the Sustainability Report for the First Half of 2025 and applying certain analytical procedures and sample review tests, which are described below:

- Meetings with the Group's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope and completeness of the content of the Report for the six-month period ended 30 June 2025.
- Analysis of the processes for compiling and validating the data presented in the Report for the six-month period ended 30 June 2025.
- Review of the information related to the risks, policies and management approaches applied in relation to the material aspects presented in the Report.
- Corroboration, through sample testing, of the information relative to the content of the Report and whether it has been adequately compiled based on data provided by the information sources.
- Procurement of a representation letter from the Directors and management.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The engagement team was comprised of professionals specialised in reviews of non-financial information and, specifically, in information on economic, social and environmental performance.

Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters described in this report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.



(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the ACCIONA Group's Sustainability Report for the First Half of 2025 has not been prepared, in all material respects, with reference to the Global Reporting Initiative Sustainability Reporting Standards (GRI Standards).

Restrictions on the Use and Distribution of our Report

In accordance with the terms of our engagement, this independent limited assurance report has been prepared exclusively for ACCIONA, S.A. in connection with its Sustainability Report for the First Half of 2025 and for no other purpose.

KPMG Asesores, S.L.U.

(Signed on original in Spanish)

Patricia Reverter Guillot

24 July 2025