

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.

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 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 update¹ 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.

¹ The initial version of this Policy was approved by the Board of Directors of ACCIONA, S.A. on 19 April 2018.