

2022

S U S T A I N A B I L I T Y   R E P O R T



## ACCIONA ENERGÍA: SUSTAINABILITY REPORT 2022

The attached Statement of Non-Financial Information, prepared in compliance with Law 11/2018, of 28 December, which incorporated Directive 2014/95/EU of the European Parliament into Spanish law, is an inseparable part of the Consolidated Directors Report for the ACCIONA Energías Renovables Corporation for 2022.

During the course of 2023, the report will be published in a format accessible by all members of the public. Until then, any request for information can be made by writing to [responsabilidadcorporativa@acciona.es](mailto:responsabilidadcorporativa@acciona.es)



## OTHER PUBLIC REPORTS BY ACCIONA ENERGÍA

### — Integrated Report

Relationship between the corporate strategy and the performance in different activities and contexts in which the company operates.

### — Half-yearly sustainability report

Evolution of the principal indicators in the first half of the year.

### — Sustainable financing report

ESG funds and impacts linked to sustainable financing achieved at project and corporate level.

### — Climate change report

Climate change risks and opportunities according to the Task Force standard on Climate-related Financial Disclosures (TCFD).

*ACCIONA Energía, a listed company, also discloses its own Sustainability Report and other reports independently.*

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# LETTER FROM THE CHAIRMAN

José Manuel Entrecanales  
Chairman of ACCIONA Energía

At the present time, the transformation of the energy sector is accelerating, and in this context renewable energies have proven their critical role in confronting two urgent priorities for most countries: namely, fulfilment of climate goals and achieving energy independence.

In spite of the current, unstable geopolitical situation, with the war in Ukraine, the lack of regulatory certainty, inflation and the increase in financing costs, the climate emergency, instead of weakening our resolve, has strengthened our plans to develop renewable energies and made them more ambitious.

In this respect, the track record of ACCIONA Energía, since it began to build its first wind farm in 1993, has demonstrated the success of a unique and differentiated business model, based on the development of solutions to decarbonise the economy, the generation of positive impact on the planet and on people and continuous innovation. This corporate concept has enabled us to conclude one of the best years in terms of economic and operating results, as well as in terms of positive impact and innovation.

Two years after it started trading on the stock market, our customers, investors and other stakeholders have recognised the solidity and solvency of ACCIONA Energía, a fact which has served as backing for its entry into prestigious indexes such as the IBEX 35 and the S&P Global Clean Energy Index. Its commitment to rigorousness and coherency has earned ACCIONA Energía a spot in the Top 100 Green Utilities, complied by Energy Intelligence, for the eighth consecutive year. According to this ranking, ACCIONA Energía is once again the greenest electric power generation company in the world.

## We accelerate the decarbonisation of the economy

As of year-end 2022, 2,354 people of 46 different nationalities work at ACCIONA Energía, and we have achieved important progress in new geographical areas, such as the investment in an important renewable energy platform in Southeast Asia,



The Blue Circle, with 84 MW in operation and a portfolio of 3.8 GW in wind power in Vietnam, Thailand, the Philippines, Cambodia, Indonesia, Laos and Sri Lanka.

In 2022, construction has also begun on the largest wind power complex in Australia, MacIntyre, with more than 1 GW of installed power, the construction of the San Juan de Marcona wind farm, the first renewable energy installation in Peru, with the power of 136 MW and, a few weeks ago, in January 2023, the startup of Extremadura I, II and III, the largest ACCIONA Energía photovoltaic complex in Spain.

On another note, we believe that batteries will enhance the versatility of renewable energy and set in motion the energy revolution of the 21st century. In this respect, ACCIONA Energía has successfully defended its leadership in storage on an industrial scale and as a player in the energy transition in the United States by acquiring a 190 MW battery and a portfolio of 1 GW of storage.

Our ability to innovate also spurs us on to continue the search for solutions for electrification of the economy. In 2022, we launched the Vehicle-To-Grid (V2G) project in the Balearic islands; this was the first network of bidirectional electric vehicle charging, which will make it possible to recover the electricity stored in car batteries for self-consumption or to inject it back into the grid.

Multiplying positive impacts

Decarbonisation has become the smartest option for companies. In specific, the year 2022 has been a record year for conclusion of power purchase agreements (PPAs), including 34 new contracts with major customers in Spain, the USA and Australia, among other countries. A special highlight has been the signature of the most important industrial renewable energy PPA in Spain, for the supply of 1 TWh per year of renewable electricity.

During the coming years, this trend will continue to gain ground and is expected to extend to the majority of transportation and industrial operations currently carried out using fossil fuels. A driving force of economic nature that will redirect growth and investment all over the world toward the horizon compatible with the global temperature limit of 1.5°C dictated by science, which will open the door to a future full of opportunities.

At ACCIONA Energía, in addition to preventing the emission of more than 13 million tonnes of CO<sub>2</sub> through renewable energy production, we have continued to accelerate compliance with our targets for reduction by 40% compared to the previous year for our Scope 1 & 2 emissions, thus maintaining a much lower intensity of emissions than our peers in the sector. We have also continued to work on developing nature-based solutions, such as planting more than 160,000 trees. Moreover, 99.9% of our investments continue to be aligned with the EU’s taxonomy of sustainable activities, while we have made progress toward circular solutions by recycling 98% of the waste generated.

As for the social component, in addition to expanding our community development programmes to more than 190,000 beneficiaries, the plans for our PEOPLE programme have accomplished important achievements.

This year we have decreased the accident frequency rate among employees and collaborating companies by 36% thanks to the integration of safety as an indispensable component of all business processes and also thanks to ongoing work with our supply chain; and we continue to increase the share of women in management positions, now at 26%, thanks to specific programs for career development and incorporation of talented women.

The solid track record and the genuine commitment of ACCIONA Energía has rapidly cemented our position as a leader in sustainability. Over the course of this year, the company has been recognised with ESG credentials in the 4 most reputable rating systems, which the company has taken part in for the first time as an independent business. In all of those systems, it has been among the 5% of companies in the sector with the highest ratings.

We clearly have an extraordinary future ahead of us, full of great challenges and opportunities, and we are in a solid, privileged position to move forward, thanks to our efforts over the last 25 years.

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## ONLY IN RENEWABLES

# MORE THAN 30 YEARS BOOSTING THE DECARBONISATION OF THE ECONOMY

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies.

## Renewable energy for a sustainable planet

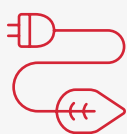
ACCIONA Energía has a consolidated geographical and technological presence and a track record of more than 30 years in renewables alone. With 11.8 GW of total installed capacity that produce 100% clean energy, the company operates in 20 countries on the 5 continents. It has a unique identity as a diversified company integrated into the entire value chain for renewable energy, from the development, financing, engineering and construction, supplying, operation and maintenance, and the marketing and sale of renewable energy and energy-related services.



↘ MORE THAN 30 YEARS



↘ 11,8 GW TOTAL INSTALLED CAPACITY



↘ 100% CLEAN ENERGY

In its clear orientation towards being a leader in sustainable investment, the company places a strong emphasis on anticipating technological trends and maintains a firm commitment to innovation. All of this places ACCIONA Energía in an ideal position for continuing to lead the advance toward a decarbonised and electrified economy, based on 100% clean sources.

- The company has a platform of renewable electricity generation assets that cannot be replicated, making a total installed capacity of 11,826 MW, of which 74% use wind technology, 16% solar photovoltaic, 7% hydroelectric, and the remaining capacity takes the form of biomass and solar thermal power plants.
- Half of the capacity is in Spain and the rest internationally, distributed among the United States, Canada, Mexico, Costa Rica, Dominican Republic, Chile, Portugal, Italy, Hungary, Poland, Croatia, Ukraine, South Africa, Egypt, Australia, India and Vietnam.
- The company is pioneer in storage batteries and green hydrogen.
- In addition to operating an energy services company in France and building its first wind farm in Peru.
- With this, ACCIONA Energía was able to produce around 24 TWh, sufficient to supply over 7.5 million homes; with great prospects for growth in regions such as Australia, the United States or Europe.

	2021	2022
Consolidated turnover (million €)	2,472	4,351
EBITDA (million €)	1,086	1,653
Total installed capacity (MW)	11,245	11,826
Total production (GWh)	24,541	23,910
Workforce	1,762	2,354

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At only one year from being listed on the stock exchange, and despite the uncertain market context, the company entered the S&P Global Clean Energy Index, and the IBEX 35. During the past year its stock entered the Stoxx Europe 600 and DBRS Morningstar and Fitch reiterated its credit rating, achievements that reassert its capacity for growth and financial soundness.

→ VALUE CHAIN

PROJECT DEVELOPMENT	ENGINEERING AND CONSTRUCTION	SUPPLY CHAIN	OPERATION AND MAINTENANCE AND ASSET MANAGEMENT	ENERGY MANAGEMENT
Local hubs with global reach with a team of >100 people.	In-house skills and high quality and high capacity assets.	Large scale purchasing power.	Higher availability than market standards.	Energy management tailored to client’s needs.
Structuring capabilities: tailor-made projects to optimise the cost of energy.	Extensive experience in resource assessment: pioneers in methodology and tools.	Close relationship with manufacturers.	+60% of incidents settled remotely by the CECOER. <sup>1</sup>	Preferred partner of large multinationals.
	Team highly renowned for its technical know-how acquired for more than 30 years.	Preferential Nordex client  More than 1,600 master supply agreements.	Predictive maintenance for “infinite” useful life.  Advanced digital strategy.	Global player in corporate PPAs.  Committed to marketing expansion.

<sup>1</sup> Renewable Energy Control Center



TECHNOLOGIES AND SERVICES<sup>2</sup>

Wind power

As pioneers, in 1993 ACCIONA Energía began the construction of the first wind farm in Spain, in Tarifa (Cadiz) and in 1994 it put the El Perdón (Navarra) wind farm into operation, the oldest commercial wind power facility in Spain. ACCIONA Energía currently ranks seventh in the world in terms of company-owned installed onshore wind capacity, excluding China’s operators (according to IHS Markit), with a total of 8,751 MW.

2022 was a year which, among other accomplishments, saw the start of the construction of the largest wind power complex in Australia, MacIntyre, in the state of Queensland. With over 1 GW of installed power, it will generate clean energy to supply nearly 700,000 homes, avoiding the emission of 3 million tonnes of CO<sub>2</sub> per year. Other milestones worthy of mention are the Company’s entry into Peru, where it has started building the construction of the San Juan de Marcona wind farm, which will supply clean energy to 478,000 homes, avoiding the emission of 275,000 tonnes of CO<sub>2</sub> per year.

The company also reached a strategic agreement with The Blue Circle, a platform for developing, building and operating a portfolio of projects in South-East Asia, which has 84 MW in operation in Vietnam and 3.8 GW of wind power projects under development in Vietnam, Thailand, Philippines, Cambodia, Indonesia, Laos and Sri Lanka. At the same time, ACCIONA Energía continues to evolve technologically, with noteworthy achievements such as Nabrawind’s BladeRunner solution, with which turbine blades weighing around 20 tonnes were raised without the use of a crane.

Furthermore, ACCIONA Energía continues to be strongly committed to floating wind power technology and in order to strengthen its capacity in this technology, in 2022 it entered as majority shareholder of Eolink, a start-up that has developed a floating pyramid-shaped platform that is able to rotate naturally to direction face the wind, optimising costs and maximising its performance. At the same time it is working on floating solutions in conjunction with ACCIONA’s infrastructure business.

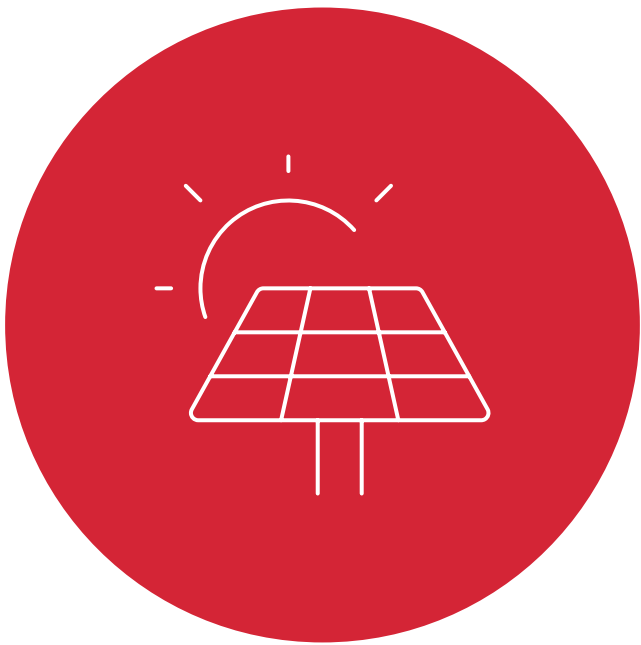
These two floating wind projects power were selected out of a total of three as part of the European Union Horizon programme for the deployment of floating offshore turbines optimised for deep water, which demonstrates the consistency of the company’s technological commitments.



<sup>2</sup> More information on the ACCIONA Energía business model visit the web site: [technologies and Solutions](#)



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Solar photovoltaic

In 2001 the company built what at the time was the largest solar photovoltaic plant in Spain, with a capacity of 1.2 MWp. Nowadays it is positioned as a leading international player, with 1,892 MW of company-owned photovoltaic power.

In 2022, amongst other achievements, it acted rapidly to build the Red Tailed Hawk photovoltaic plant (460 MWp) in the United States, where the company already has more than 1,300 MW under construction. Furthermore, construction concluded on Extremadura I, II and III (125 MWp), the largest ACCIONA Energía photovoltaic complex in Spain. This project will generate clean energy equivalent to the consumption of 65,000 homes, which will avoid the emission of 112,000 tonnes of CO<sub>2</sub> into the atmosphere every year.

Hydroelectric

ACCIONA Energía has solid experience in this technology, with experience with 100 year old operating assets. It currently operates 828 MW, including an 89 MW reversible plant.

Thermal renewables

ACCIONA Energía already has 61 MW in three pioneering biomass plants in Spain and 64 MW in a solar thermal plant in the United States. After winning the contract in Spain in the tender organised in 2022 by the Ministry for Ecological Transition and Demographic Challenge, the company will build a new 50 MW biomass plant in the locality of Logrosán (Cáceres), with construction commencing in 2023.

Energy sales

ACCIONA Energía is acknowledged has having one of the most extensive portfolios of long term power supply agreements (PPAs) in the world. In 2022, the company was the third company to conclude corporate clean energy agreements with corporations at global level, according to BloombergNEF, amongst which special mention is made of the signing of the most important industrial renewable PPA in Spain, for the supply of over 1 TWh of renewable electricity every year with physical delivery and for 5-to-10-year periods.

In 2022 the company also reconfirmed its position as the largest independent 100% renewable electricity trader in Spain, according to data made public by the Spanish National Markets and Competition Commission (CNMC).

The excellent sales performance was also reflected in the new business of selling to SMEs in Spain, which has managed to provide to more than 20,000 supply points in less than 2 years from being launched.

Energy storage

In 2012, the company had already concluded the first European experience of a solar photovoltaic facility with energy storage in batteries, and which is now acknowledged as being pioneer in Spain in grid-connected storage in wind and photovoltaic plants.

In order to continue leading the growth of storage technologies, in 2022 ACCIONA Energía entered into an agreement with Qcells, a subsidiary of the South Korean industrial group, Hanwha Corporation, to acquire a portfolio of more than 1 GW of battery energy storage in the United States and a project, Cunningham (190 MW), which will be the largest electricity network in Texas and will come into operation in the first quarter of 2023. With this acquisition, ACCIONA Energía has become a relevant player in storage on an industrial scale in the United States, where it already operates more than 1 GW of wind and solar thermal power.

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Green hydrogen

In 2022 ACCIONA Energía inaugurated first industrial renewable hydrogen plant in Spain (in Lloseta, Mallorca), which has become a reference in Europe as the first hydrogen ecosystem that comprises the entire value chain. In parallel, in Spain and Portugal, the joint venture ACCIONA Plug continues to materialise an extensive portfolio of electrolyzers.

Furthermore, amongst many other initiatives, the company progresses with the development of pilot projects in countries with high potential for green hydrogen production, such as Chile and Australia.

Energy services

The company designs and invests in solutions that optimise and reduce the energy consumption of public and private customers. In 2022, the company entered the French market, following the acquisition of the French energy efficiency company Eqinov, and began operating in the city of Gijón, in what was the largest energy service contract tendered in Spain to date, thus consolidating its leadership in energy services. In total, the company already handles the energy management of more than 6,000 facilities in over 50 countries for public and private customers, equivalent to 4,000 GWh of energy consumption per year. It also manages more than 120,000 lighting points for town councils and industrial plants.

Smart electric vehicle charging

After acquiring Cargacoches in 2021, ACCIONA Recarga has grown consistently in the sector of electric charging in Spain, focusing strategically on urban and interurban charging, and for businesses. The business already has more than 27,000 registered users. We would also point out the joint venture signed with Qwello for expanding urban charging in Spain, in conjunction with whom we expect to install the first chargers in 2023.

In 2022 the company put the Vehicle-To-Grid (V2G) project into operation in the Balearic islands; this was the first network of bidirectional electric vehicle charging in Spain and which will make it possible to recover the electricity stored in car batteries for self-consumption or to inject it back into the grid. The ecosystem is characterised as being 100% renewable and entails the first-time introduction of V2G technology on an industrial scale in Spain.

New energy solutions

The company remains very active in the advancement of new models for optimising renewable energy generation (such as hybridisation or repowering), broadening the offer to customers (such as self-consumption and off-grid generation), and the launching of key technology niches (such as floating wind and solar), in addition to solutions on green hydrogen, storage, electric vehicles and circular economy, following an innovation plan based on studying the most advanced technological trends in the sector.

Circular economy solutions

In 2022 ACCIONA Energía recycled 98% of the waste generated as a result of its circular economy programmes, which was almost 1% more compared to the previous year. Amongst other achievements, and with the aim of promoting opportunities for sustainability in the green energy sector, in 2022 RenerCycle initiative was undertaken, intended to develop comprehensive circular economy solutions in the field of the wind power, along with another 18 companies in the sector.

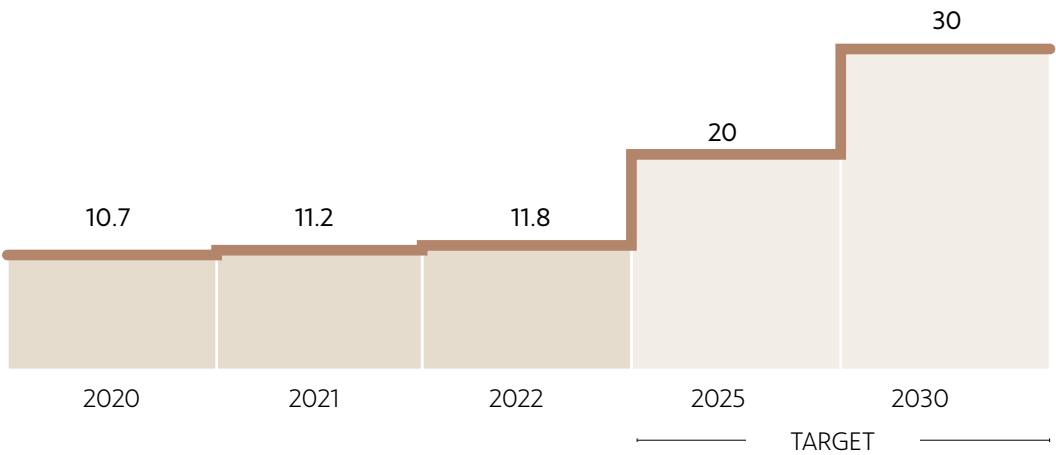
For 2023 around 50,000 turbines in Europe are expected to come to the end of their useful life; the objective of this initiative is to provide a comprehensive solution for decommissioning wind farms. The intention of RenerCycle is to extend its services to other fields requiring circular solutions.

Double growth

The energy sector is witnessing an emergency which combines the existing gap in the attainment of the targets for sustainable development by 2030, and the historic crisis triggered by the Russian invasion of Ukraine. In the search for strategic independence, now a pressing need following the adverse impacts of the geopolitical conflict, an unprecedented momentum has arisen for clean energy, establishing even more its foundations as competitive, autonomous energy, and reaching record investment in 2022.

In this new context, the company continues with the commitment assumed in the IPO to accelerating its growth and plans to multiply its investment in the coming years, from the 12 GW installed in 2022 to 30 GW by 2030.

→ **INSTALLED CAPACITY TARGETS**  
GW



The planned growth is distributed almost equally between wind and photovoltaic energy and will consolidate the company's presence in its five main markets: Nevertheless, the company continues working to develop assets in countries with long-term growth potential within its operational hubs, and is also advancing strongly in other technologies such as green hydrogen, storage and offshore wind power.

As solid foundations to ensure this ambitious growth, the company has defined the following levers that will enable it to maximise profitability:

- Industry-leading asset management that assures and maximises future cash flows, with the goal of extending the useful life of assets through the development of life extension programmes and best practices in digitalisation. The company has a robust digital transformation plan, with more than 200 initiatives for improvements in productivity and efficiency throughout the whole value chain.
- Sophisticated energy management, seeking maximum profitability through sale mechanisms diversification: public PPAs, corporate PPAs, feed-in-tariffs, market strategies and financial hedging, among others.
- Expansion of sales capacity, by strengthening the Business-to-Business customer portfolio.

## Renewable market trends

### Global renewable energy market overview

In 2022, the International Energy Agency calculated that the world-wide installed capacity of renewable energy increased by almost 11% year-on-year in comparison with the average 9% growth during the period 2017-2021. In 2022 an additional 300 GW of wind and solar photovoltaic capacity were installed but, despite continuing growth, the global share of global wind and solar capacity in the total energy generation pool is still less than 25%. This figure indicates the great market potential for the system to reach 100% of renewable energy, to which many regions of the world are already coming close without giving rise to any major bottlenecks in integrating the system.

According to this source, the world will introduce as much renewable energy in the next five years as in the last twenty. An increase of 2,400 GW is forecast in the renewable energy capacity for the 2022-2027 period, equivalent to the entire present energy production in China. This sharp rise exceeds the forecasts of only a year ago by 30%, emphasising the relevance with which governments have promoted clean energy.

Along these lines, the installed capacity of solar photovoltaic power will exceed that of coal by 2027, becoming the largest in the world, and the world-wide wind capacity will almost double. Another example of this boom is that, in 2022, the world-wide investment in energy transition rose to 1.1 billion dollars, 31% more than the previous year and for the first time matching the total annual investment in fossil fuels. Nevertheless, according to data from BloombergNEF, investment has to be trebled over the remainder of the decade until 2030 if it is to reach the zero emissions target.

### Increasing competitiveness of renewable energy against conventional generation sources

Solar PV and onshore wind energy are now the most competitive sources of new-build generation in countries that cover two-thirds of the global population, comprising 90% of the world's energy generation.

Furthermore, it is forecast that the costs of fossil-based generation will continue to be far higher than the historical averages until 2025, which will erode even more its competitiveness with the zero-emission alternatives, according to the International Energy Agency.

Unprecedented drive by public sector entities towards decarbonisation

Net-zero emission targets now cover 90% of the world's GDP, including those countries that largely contribute to global carbon emissions. Furthermore, the global energy crisis has triggered an unprecedented acceleration in clean energy in the form of long term support policies in the European Union, the United States, China, Australia, and in Latin American and South-East Asian countries, with high aspirations in renewable energy and new measures that will act as the roadmap which will mark the direction of the sector in the decades to come. Especially noteworthy are the advances in Europe and USA, boosted by the good long and medium term perspectives given by policies like REPowerEU and the Inflation Reduction Act, respectively.

Expansion of Green Hydrogen

The International Energy Agency estimates that the world-wide renewable capacity dedicated to hydrogen production will multiply by 100 in the next five years, offering a unique opportunity for decarbonising industry and transport. Green H<sub>2</sub> is expected to expand the reach of clean energy solutions to industrial and mobility sectors with emissions difficult to eliminate, such as steel making, chemicals manufacturing and heavy-duty transport; it is therefore a vector with great potential for decarbonising uses that are difficult to electrify and for which the company has an ambitious plan in place in Spain and Portugal through the joint venture ACCIONA Plug.

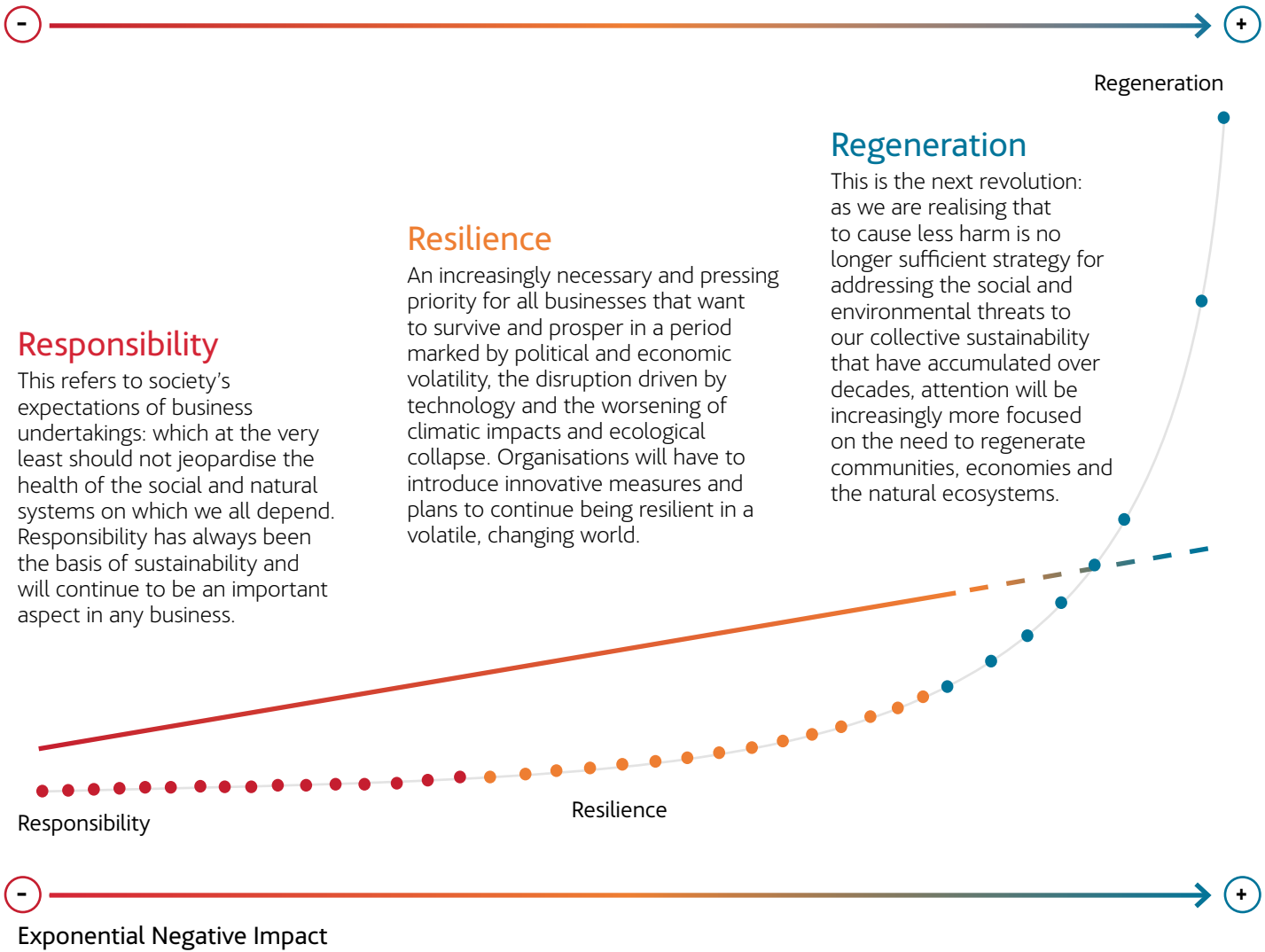
A new shared purpose

2022 saw the definition and launch of the new ACCIONA purpose of materialising something that the company has been demonstrating over the past 25 years: to change the course of history, things have to be done differently.

From responsibility to regeneration

→ THE THREE Rs

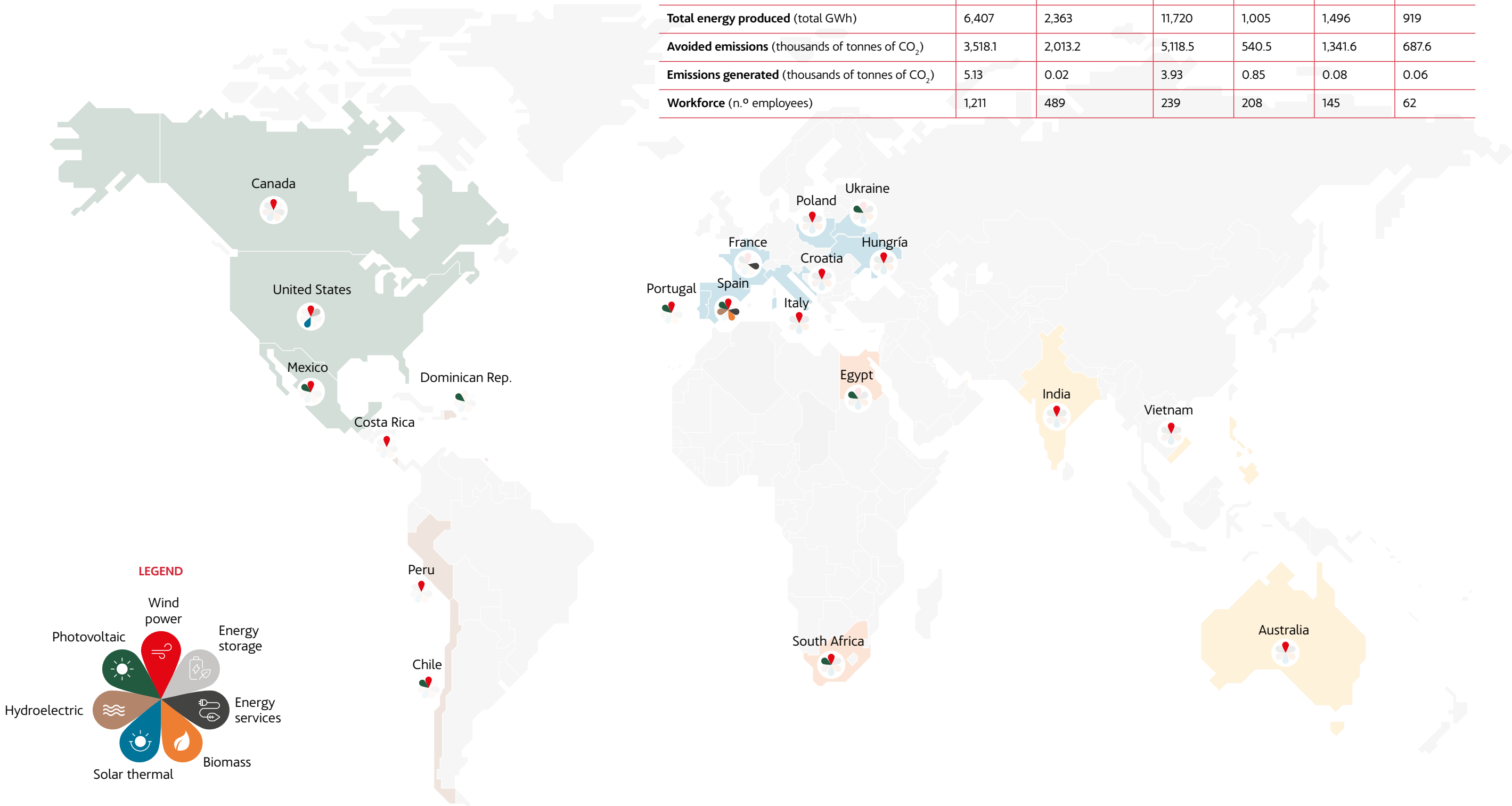
Exponential Positive Impact



AT ACCIONA, WE CHALLENGE THE PRESENT TO MAKE THE FUTURE POSSIBLE FOR EVERYONE. THIS IS THE COMPANY'S PURPOSE AND ITS RAISON D'ÊTRE.

# ACCIONA Energía in the world

Present in 20 countries around the world



	NORTH AMERICA	CENTRAL AND SOUTH AMERICA	SPAIN	REST OF EUROPE	ASIA AND OCEANIA	AFRICA
Consolidated sales (million €)	361.00	280.84	3,198.32	363.53	90.58	56.57
Total installed power (MW)	3,154.4	1,030.1	5,796.2	575.9	851.2	418.3
Total energy produced (total GWh)	6,407	2,363	11,720	1,005	1,496	919
Avoided emissions (thousands of tonnes of CO <sub>2</sub> )	3,518.1	2,013.2	5,118.5	540.5	1,341.6	687.6
Emissions generated (thousands of tonnes of CO <sub>2</sub> )	5.13	0.02	3.93	0.85	0.08	0.06
Workforce (n.º employees)	1,211	489	239	208	145	62

# 03

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## SUSTAINABILITY AND MATERIALITY GOVERNANCE



# SUSTAINABILITY AND GOVERNANCE MANAGEMENT

ACCIONA Energía has a governance model designed to integrate risk management, opportunities and material impacts into decision-making.



## Sustainability governance

ACCIONA Energía created in 2021 the Audit and Sustainability Committee that serves as an instrument and provides support to the Board of Directors in the supervision of accounting, financial and non-financial information, the best practices in sustainability, the internal and external audit services and risk management. The Committee meets at least 4 times a year, depending on its needs.

### FUNCTIONS OF THE AUDIT AND SUSTAINABILITY COMMITTEE IN TERMS OF ESG<sup>3</sup>

- Regularly review the efficiency of the internal control and non-financial risk management systems.
- Supervise and evaluate the preparation process, integrity and market presentation of the mandatory non-financial information, both annual and interim, revising compliance with regulatory requirements, the appropriate delimitation of the consolidation perimeter and the proper application of accounting criteria, and raise its reports to the Board of Directors.
- Identify and guide the sustainability policies, rules, commitments, objectives, strategy and best practices. Ensure that Company practices in environmental and social matters are in line with the strategy and policies set.
- Identify and guide the policies and rules on corporate governance before they are submitted to the Board of Directors. Supervise compliance with the policies and rules and the internal rules of conduct applicable to the company and its group, ensuring at the same time that the corporate culture is in line with its purpose and values.

<sup>3</sup>Full explanation of the functions, powers and members of the Audit and Sustainability Committee available at: [Board of directors and committees](#).

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ESG matters discussed at the meetings held in 2022 were:

- Submitting to the Committee the new edition of the Human Resources and Occupational Risk Prevention Policy and the Diversity, Equity and Inclusion Policy, which were included in the Book of Policies.
- Follow-up of sustainability performance.
- Analysis of the design of the work programme on the 2022 ratings and ESG report.

The members of the Committee had a training session on sustainability and cybersecurity at one of their meetings.

The Statement of Non-Financial Information is submitted for review and approval by the General Shareholders' Meeting as required in Law 11/2018. The shareholders have the opportunity to comment on the initiatives and annual performance described in this Report.

The Sustainability Management is the area that organises and promotes the initiatives and commitments of the 2025 SMP. This area directly reports to the Audit and Sustainability Committee and to the Chief Financial and Sustainability Officer (CFSO). The purpose of the corporate sustainability function is to maximise the impact of the company's solutions and make ACCIONA Energía's leadership on non-financial matters visible.

In addition, it relies on sustainability speakers in strategic markets. This enables it to have direct knowledge of the social and environmental context in different international markets, as well as greater coordination in the implementation of initiatives.

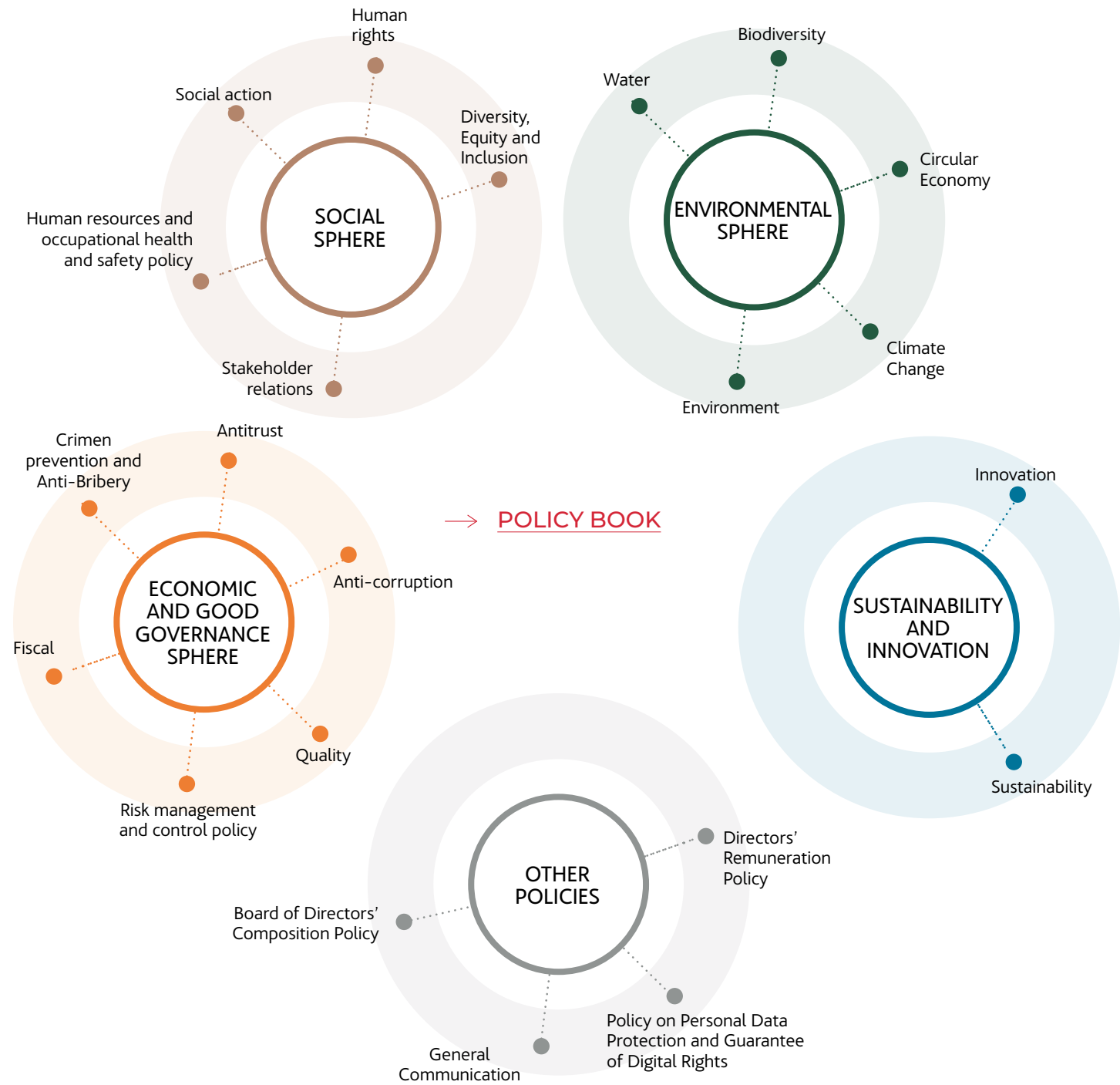
POLICY BOOK

The Policy Book, approved in 2021 by the Audit and Sustainability Committee, contains the commitments and principles of action applicable to all the company's companies in economic, social, environmental and good governance terms. Sustainability policies:

- Sustainability and Innovation
- Economic and Good Governance Sphere
- Social Sphere
- Environmental Sphere

Other policies:

- General Communication Policy
- Board of Directors' Composition Policy,
- ACCIONA Energía's Directors' Remuneration Policy
- Policy on Personal Data Protection and Guarantee of Digital Rights.





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# SMP 2021-2025: we must speed up and we have a plan

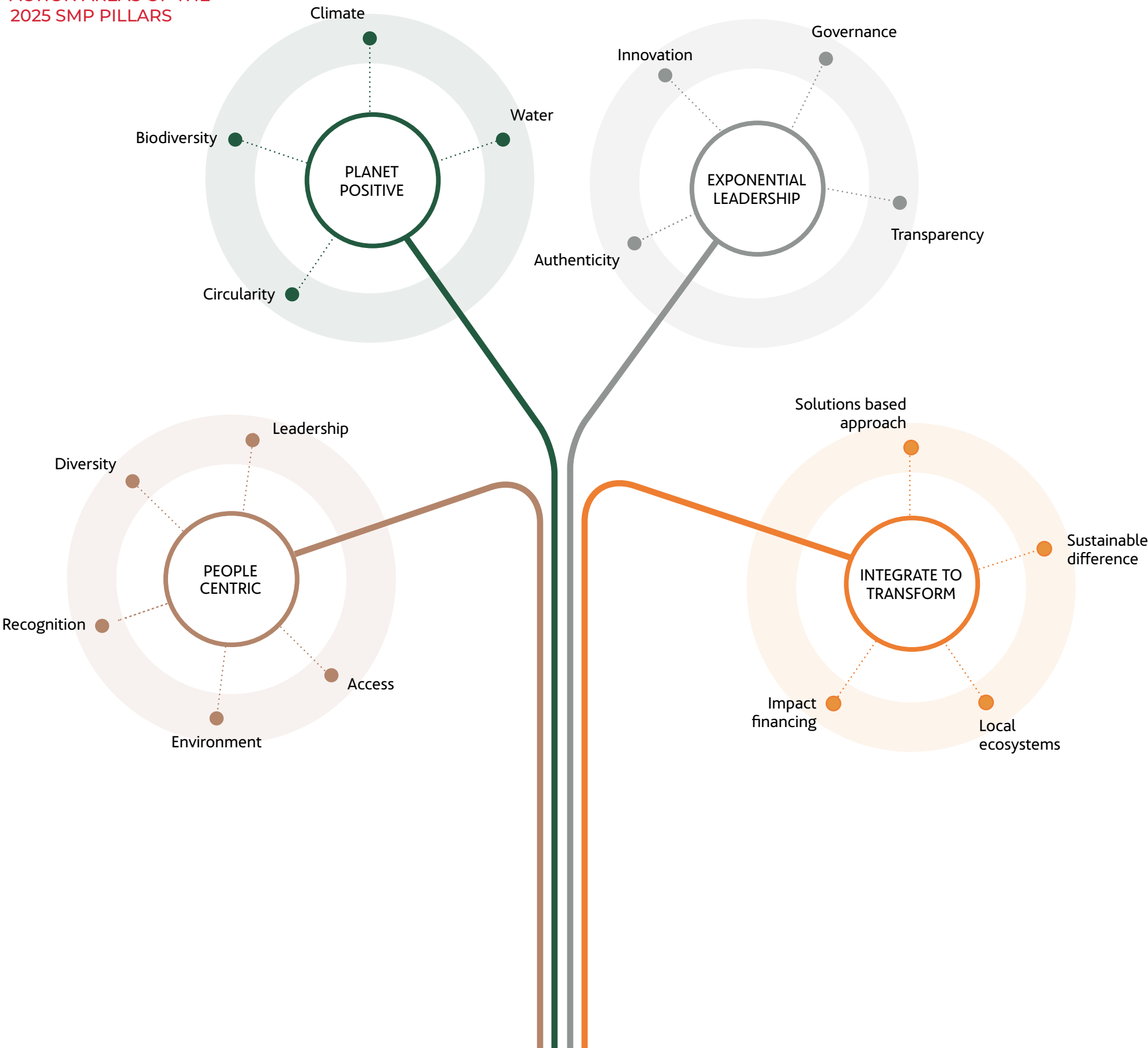
ACCIONA Energía’s sustainability strategy is based on five-year Sustainability Master Plans (SMPs). The actions and targets contained in these plans are promoted, approved and supervised by the Board of Directors’ Audit and Sustainability Committee.

The implementation of the company’s sustainability strategy and the meeting of commitments are linked to a percentage of the bonuses received by directors, managers and some technical and support staff. In this annual evaluation, the achievement of sustainability targets such as the reduction of greenhouse gas emissions, the decrease of the frequency rate of occupational accidents or the fulfilment of objectives linked to gender equality are considered.

The purpose of the 2025 SMP is to encourage ACCIONA Energía to re-imagine infrastructures. ACCIONA Energía invests in, develops and operates renewable energy assets and other decarbonisation solutions to make the planet sustainable. The company aspires to become a renowned leader in developing basic infrastructure assets with an added value, with a regenerative value that creates a positive impact with people and the planet in mind.

Each of the four 2025 SMP pillars has several areas of action and a marked path for being able to generate a regenerative impact by the end of the period established. Those pillars are reflected on the right:

→ ACTION AREAS OF THE 2025 SMP Pillars



Sustainability governance	15	SMP 2021-2025: We must speed up and we have a plan	17	Relationships with stakeholders	19	Double materiality assessment	19	Non-financial risk management	22	Monetary valuation of impact	23
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→ SMP BALANCE

QUALITY OF LIFE, INCLUSIVE FUTURE.  
OUR ADVANTAGE COMES FROM PEOPLE

PILLARS	LEADERSHIP We develop agents of change able to contribute a competitive edge.	DIVERSE AND INCLUSIVE We will be more diverse because this will make us better.				RECOGNITION OF MERIT We will develop our model for better recognition of excellence and outstanding effort.		ENVIRONMENT We will have a smart and secure workplace, a reflection of our values.					ACCESS TO RIGHTS We ensure compliance with the fundamental rights of the people participating in our value systems.			
	Definition of the company's purpose, promise and principles which will be introduced as from 2023.	26% of women in top-level and middle-level management positions.	1.58% wage gap.	13.12% increase in disabled employees in Spain compared to 2020.	Three 50:50 ongoing projects.	Specific training and development programmes designed to give an impetus to development, technical excellence, specialisation, internationalisation and visibility for critical groups.	Up to a 10% extension in the weight of indicators relating to the SMP in the systems for recognition and variable remuneration of employees eligible for company bonds.	Health and safety programme covering 100% of employees.	Global programme for a healthy lifestyle and emotional management.	EU Award for the Drive Safe Programme in the Professional Drivers category.	Implementation of a programme for Contractor Health and Safety Management.	-36% in accident frequency rate involving own employees and sub-contractors.	Participation in the GWO Global Wind Organisation.	Approval of the Corporate Standard on the Internal Control System for Social Safeguards.	132 audits carried out on direct suppliers and 40 on tier 2 suppliers.	99% of approved suppliers.
ADVANCES 2022																

FROM NET ZERO TO POSITIVE CONTRIBUTION.  
INVEST TO REGENERATE THE PLANET

CONNECT TO AFFECT.  
DIFFERENCE IN EVERY PROJECT

PILLARS	CLIMATE We will extend our recognition as main players in the transition towards a decarbonised economy.		BIODIVERSITY We will generate net positive natural capital.		CIRCULARITY We will have the skills for developing zero waste projects.		WATER We will significantly increase the supply of quality water and its sustainable use with high-technology.	SOLUTIONS BASED APPROACH The value proposition will be based on integrated infrastructures designed to maximise their contribution to the sustainable development goals.	SUSTAINABLE DIFFERENCE IN EVERY PROJECT The sustainable difference of ACCIONA Energía is evident in each project.	LOCAL ECOSYSTEMS We will develop an ecosystem of organisations capable of increasing our capacity for regenerative transformation.		IMPACT FUNDING We will maximise the capacity of sustainable finances to enhance the company's value and the competitive regenerating advantages of our projects
	More than 99 % of eligible CapEx is aligned with the European taxonomy of low-carbon activities.	80% reduction in scope 1 and 2 GHG emissions compared to the baseline year 2017.	Total of 198,081 additional trees planted in 2021-2022.	First pilot phase implemented for quantifying nature-related risks – TNFD.	13% of reused or recycled resources consumed.	98% of waste generated used for recovery.	45% reduction in the use of surface water, groundwater and municipal water in water-stressed areas.	114 projects and services with Social Impact Management in 13 countries, with a total of 212 initiatives implemented.	Publication of the Regenerative playbook that will help to set out the sustainable difference in projects.	1,432 hours of volunteer work invested by ACCIONA Energía employees.	Alliance with WBCSD	€5,092 M of financing associated to sustainability targets.
ADVANCES 2022												

AUTHENTICITY, TRANSPARENCY.  
WE PURSUE A PURPOSE

PILLARS	AUTHENTICITY We share the same values and work towards the same purpose in each work centre.	SUSTAINABLE TRANSFORMATIONAL INNOVATION We will develop a regenerative differentiating innovative value in principal company solutions.	GOVERNANCE We will maintain leadership from the ACCIONA Energía governing body for stimulating and supervising the fulfilment of our corporate purpose.			TRANSPARENCY We will submit to the contrast of constant review.		
	58% increase in staff participation in the Engagement & Sustainability Global Barometer survey. ACCIONA's global employee engagement stands at 69%.	15% of innovation projects will include some regenerative element in their design and implementation.	Presentation and approval by the Audit and Sustainability Committee of the company's purpose, promise and principles.	45.5% of women on the Board of Directors.	0% of general purchases from No-Go Suppliers.	Use of the Minerva tool which makes it possible to have a transparent digital reporting system for all ACCIONA projects.	Participation in 6 open forums for dialogue and brainstorming.	Start of implementation of the new ESG supplier assessment model.
ADVANCES 2022								

Partially activated lever

Totally activated lever

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The following chapters describe in detail the strategies developed and their results in the indicators, as well as other factors that influenced the variation of the KPIs.

Relationships with stakeholders

Communication and constant dialogue are the cornerstones of ACCIONA Energía’s relationship with its stakeholders, namely the individuals and organisations that are directly or indirectly affected by the activity of the company: employees, customers, local communities, suppliers and subcontractors, public administrations and regulatory bodies, investors and analysts.

The Stakeholder Relations Policy included in the Book of Policies in the Social Sphere identifies the main stakeholders and outlines the company’s principles for learning about their needs and expectations in order to facilitate the generation of shared value and the establishing of long-term relationships.

STAKEHOLDERS	MEANS OF COMMUNICATION	MATTERS DISCUSSED
Employees	E-mails, newsletters, intranet,commitment survey	Prevention, safety, health and talent management measures, initiatives for sustainability
Customers	Apps, CRMs, call centres, open doors events, personal agents	Quality and safety of products and services
Local communities	Web forms, e-mails, phone numbers, suggestion boxes and customer service offices	Local impact of projects
Suppliers and subcontractors	Supplier Satisfaction Survey, procurement email directions	Integrity, occupational risk prevention, human rights
Public Administrations and regulatory bodies	Public query processes	Regulatory frameworks for decarbonisation and renewable technologies
Investors and analysts	Conferences, roadshows, reverse roadshows and earnings reports	Low-carbon activity

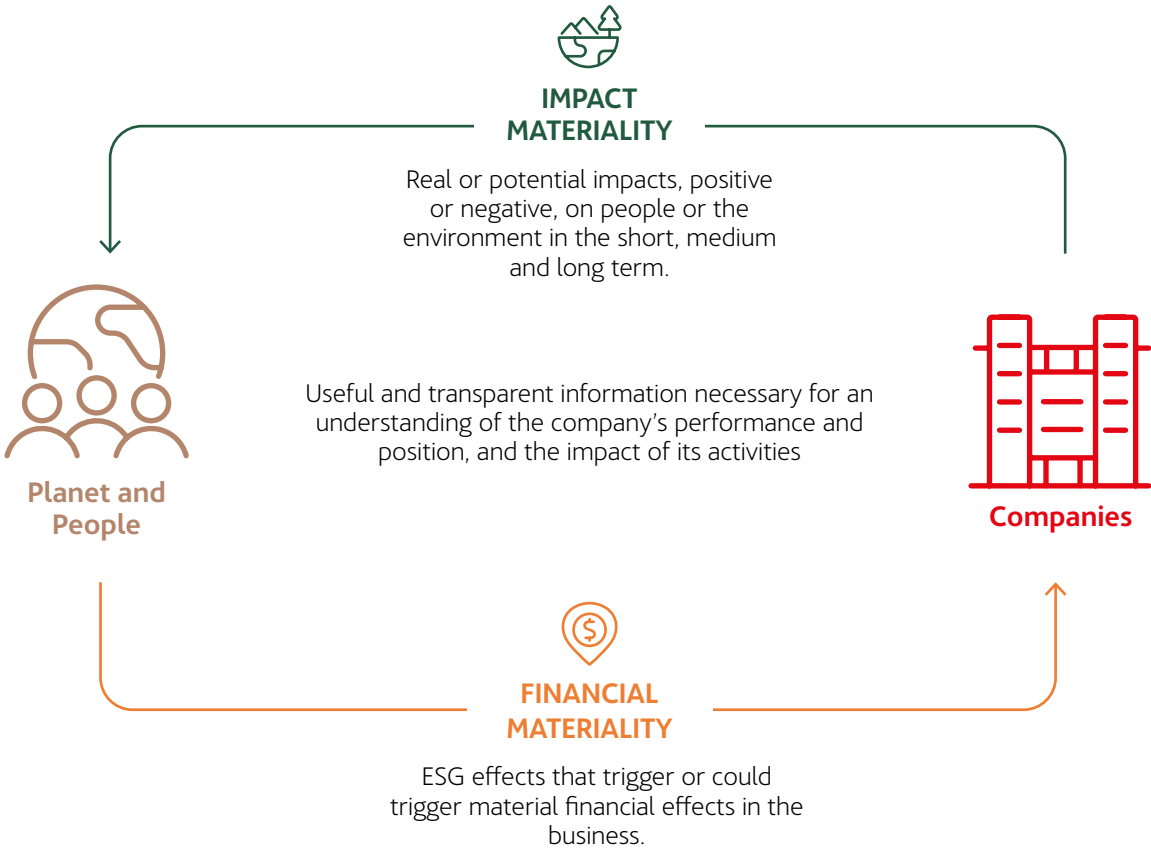
Double materiality assessment

(GRI 3-1, 3-2) (ESRS 2)

The double materiality approach has been used for identifying the content of this report presented under the European Sustainability Reporting Standards (ESRS), which define the obligations of reporting the issues contemplated in the EU Directive 2022/2464 of Non-Financial Reporting, dated 10 November 2022.

The methodology followed focuses on two processes. The first one consists of identifying the financial risks and opportunities arising from ESG issues (Environment, Social and Governance) provided for in various time frames. The second analyses the impacts of the business and its entire value chain on the economy, society and the environment.

DOUBLE MATERIALITY



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PHASES OF THE ANALYSIS:

01

Identification of issues.

The material topics considered this year have been updated with regard to the analyses carried out in macrorends included in the Global Infrastructure Hub Infrastructure Futures Report and its crossover with the 2025 Sustainability Master Plan. These issues were complemented with the ten independent thematic standards for the sector published on 15 November 2022 by the European Financial Reporting Advisory Group (EFRAG).

The material topics identified for analysis this year were validated by the company's primary stakeholders.

This year the number of material topics has gone up from 16 (2021) to 18 (2022) due to the following changes:

- Division of climate change into two (Adaptation to Climate Change and Mitigation of Climate Change).
- Combining the 2021 material topics "Communities" and "Local development", into "Development of Local Communities".
- Elimination of "Corporate Governance" as a material topic, as there is a specific independent report on the topic.
- Inclusion of "Innovation in Industry", "Development of sustainable financing" and "Transparency and dialogue" as in-house material topics.

02

Analysis of impact materiality.

- 2.1 Preliminary study of the positive and negative impacts of the material topics identified. This has been carried out taking into account the different updated research sources that are the most renowned on each topic.
- 2.2 Analysis of the impact in different time frames (short, medium and long term).
- 2.3 Evaluation of the scale, scope and capacity for remediation that the impacts detected have on the planet and on people according to experts in the sectors in which the company operates.

This analysis provides stakeholders with an overview of the company's impact on the economy, society (including human rights) and the environment.

03

Analysis of financial materiality.

- 3.1 Analysis of the impact of external events (not contemplated in the financial report), related to sustainability, in respect of the company's capacity to continue generating value in the short, medium and long term. This is an internal analysis of the possibility that the material topics detected could result in a risk or a relevant opportunity for ACCIONA Energía in terms of the different capitals<sup>4</sup> (income, raw materials, operating costs, regulatory changes, market share and share value).

This analysis provides an overview of the company's ability to address the risks associated to sustainability.

04

Prioritisation of material topics.

The material topics identified are subsequently prioritised for both analyses. The methods used are those drafted in the EFRAG conceptual guidelines on double materiality and those established by the GRI 3 (2021) standard on material topics.

<sup>4</sup>The capitals have been extracted and adapted from those drawn up by the International Integrated Reporting Council (IIRC).

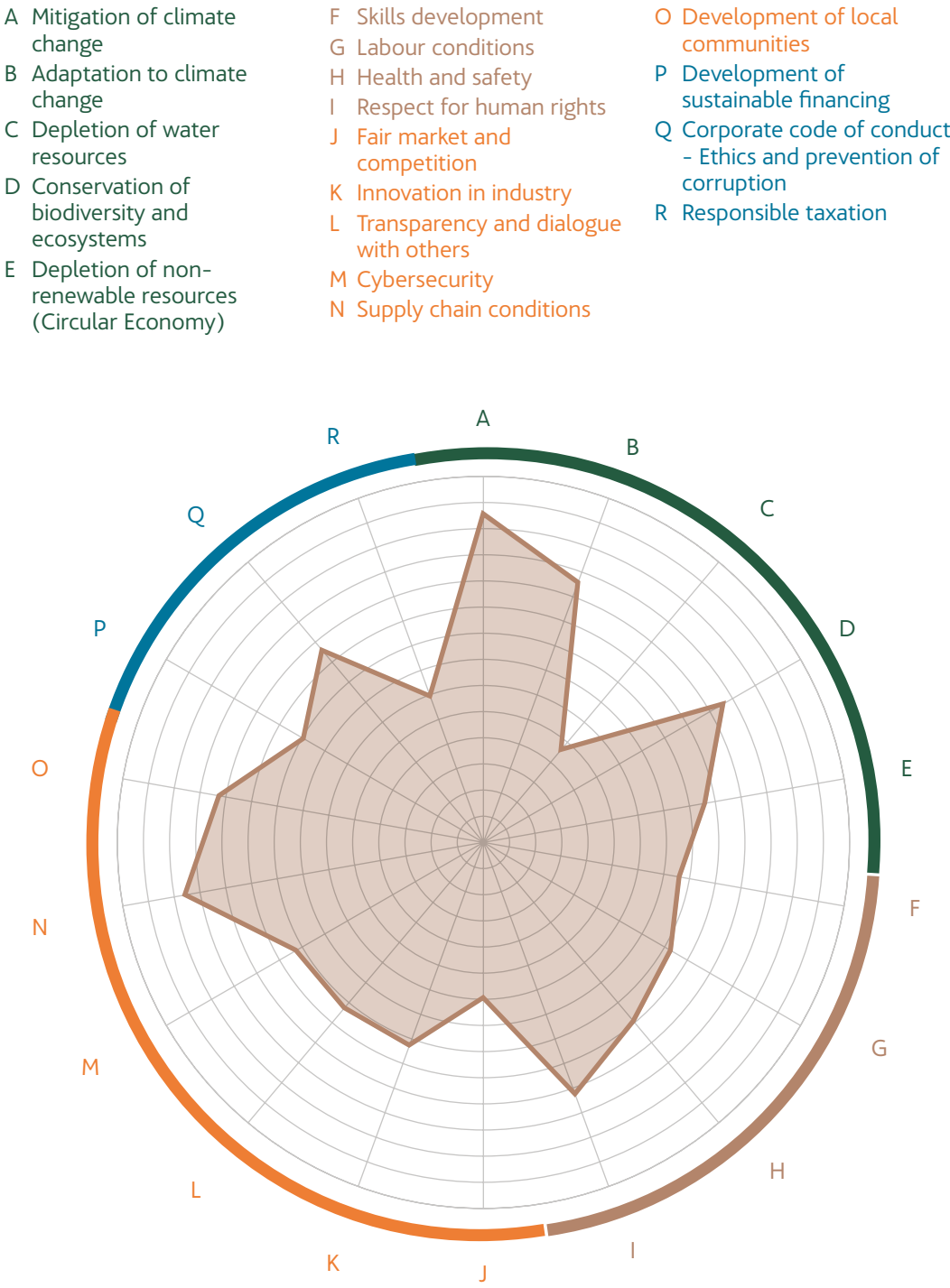
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→ INTEREST SHOWN BY STAKEHOLDERS IN THE INFORMATION PRESENTED IN THE REPORT AND INTERNAL ANALYSIS

	MATERIAL TOPIC	CSRD RELATIONSHIP
1	Mitigation of climate change (%)	CSRD Relationship
2	Value chain conditions	
3	Conservation of biodiversity and ecosystems	ESRS S2
4	Conservation of biodiversity and ecosystems	ESRS E4
5	Circular Economy	ESRS S5
6	Skills development	ESRS S1 - 17
7	Diversity and working conditions	ESRS S1
8	Health and Safety	ESRS S1 - 14
9	Respect for Human Rights	ESRS 1 & 2
10	Customers and a fair market	ESRS S4
11	Innovation in industry	ACCIONA
12	Transparency and dialogue	ACCIONA
13	Cybersecurity	ACCIONA
14	Depletion of water resources	ESRS E3
15	Development of local communities	ESRS S3
16	Development of sustainable financing	ACCIONA
17	Corporate code of conduct	ESRS G1
18	Responsible taxation	ACCIONA

According to the guideline procedures of the European Financial Reporting Advisory Group (EFRAG), the 18 material topics presented in this report have been important or a higher category regarding the impact materiality and therefore it is relevant to mention them in this report. To come into line with regulatory requirements, compliance with standards is shown, and we provide our own topics that are considered material. ESRS E2 on pollution is described in detail in the chapter Planet Positive.

→ MATERIALITY ASSESSMENT FOR THE ENERGY SECTOR



The table shows the relevance of the information for the renewable energy sector of ACCIONA Energía. The development of its financial impact in the company is investigated in each material topic.



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## Non-financial risk management

Risk management<sup>5</sup> is a process forming part of ACCIONA Energía’s strategic management and supported by the Board of Directors through which any potential events that might have an impact on the company are identified, assessed and managed. The process ensures proper treatment and control of the resulting risk scenarios, so that they can be contained within an acceptable tolerance threshold.

In addition to the Board, the bodies responsible for the Risk Management System are the Audit and Sustainability Committee, the Finance and Sustainability General Management, the Risk Management and Control Units, and the company’s Steering Committee.

The process of managing non-financial risk management is carried out every year. Each risk event (financial and economic, strategic, operational and unforeseeable) is assessed using criteria such as probability, economic-financial impact, reputational damage, impact on sustainability and development, the company’s ability to manage it, and management of risk determined by the company.

The analysis is conducted from four perspectives: market, financial, emerging trends (including cybersecurity) and ESG – also known as non-financial or sustainability.

### ESG RISK ASSESSMENT

#### ESG Risk assessment in projects under way

First of all, the ESG risk assessment offers a materiality analysis of the company’s risks related to the environment, the social sphere and governance, in addition to providing a greater understanding of the possible impact economic that would be generated in the company by its materialisation and the risk response measures introduced or that can be introduced in the company’s facilities.

A GRANULAR RISK ANALYSIS HAS BEEN CARRIED OUT AT LOCAL LEVEL FOR THE COMPANY’S MORE THAN 450 FACILITIES.

In 2022, the company has advanced in the development of the ESG Risk Management System<sup>6</sup>. The main innovations introduced this year were:

- The higher granularity level, obtained at local level for all company facilities.
- The increase in ESG variables ESG assessed consistently (28 variables).
- The increase in the amount of information obtained at local level, focused on the facilities seen to have the greatest inherent risk.
- Greater detail regarding the risk mitigation measures implemented and that can be implemented at project level.

The more than 450 company facilities have been assessed on the basis of the probability of occurrence, depending on their geographical location and an objective indicator of economic and financial consequences for each of the potential risks posed by the 28 ESG variables analysed. This first analysis has made it possible to identify the facilities with a high inherent risk, on which a second analysis has been carried out at local level which enabled adjustments to the previous conclusions drawn, and also to investigate the new risk mitigation measures implemented and propose new mitigation measures if necessary.

<sup>5</sup> More information on the Risk Management System in the [Corporate Governance Report](#)

<sup>6</sup> More information on climate risk management see the chapter [“Planet positive”](#).

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→ REPRESENTATIVENESS OF ESG RISKS IN THE ASSESSMENT (%)

ESG RISKS	PERCENTAGE
Working and employment conditions	4%
Biodiversity and protected areas	14%
Occupational health & safety	13%
Ethical behaviour of organisations	10%
Discrimination in the work place	8%
Environmental regulatory framework	8%
Fundamental rights and principles	7%
Corruption	20%
Right to privacy	2%
Cyber risks	2%
Waste management	1%

\* Values rounded off

Some of the conclusions obtained in the ESG risk consultation and assessment process are:

- None of the facilities has a high ESG risk.
- The risks having the greatest weight in the company’s facilities as a whole are: the corruption (20%), biodiversity and protected areas (14%), health and safety in the workplace (13%), waterstress (10%) and the ethical behaviour of organisations (10%).
- At country level, the centres with an average higher risk are located in the Dominican Republic, Brazil and Peru.



## Monetary valuation of impact

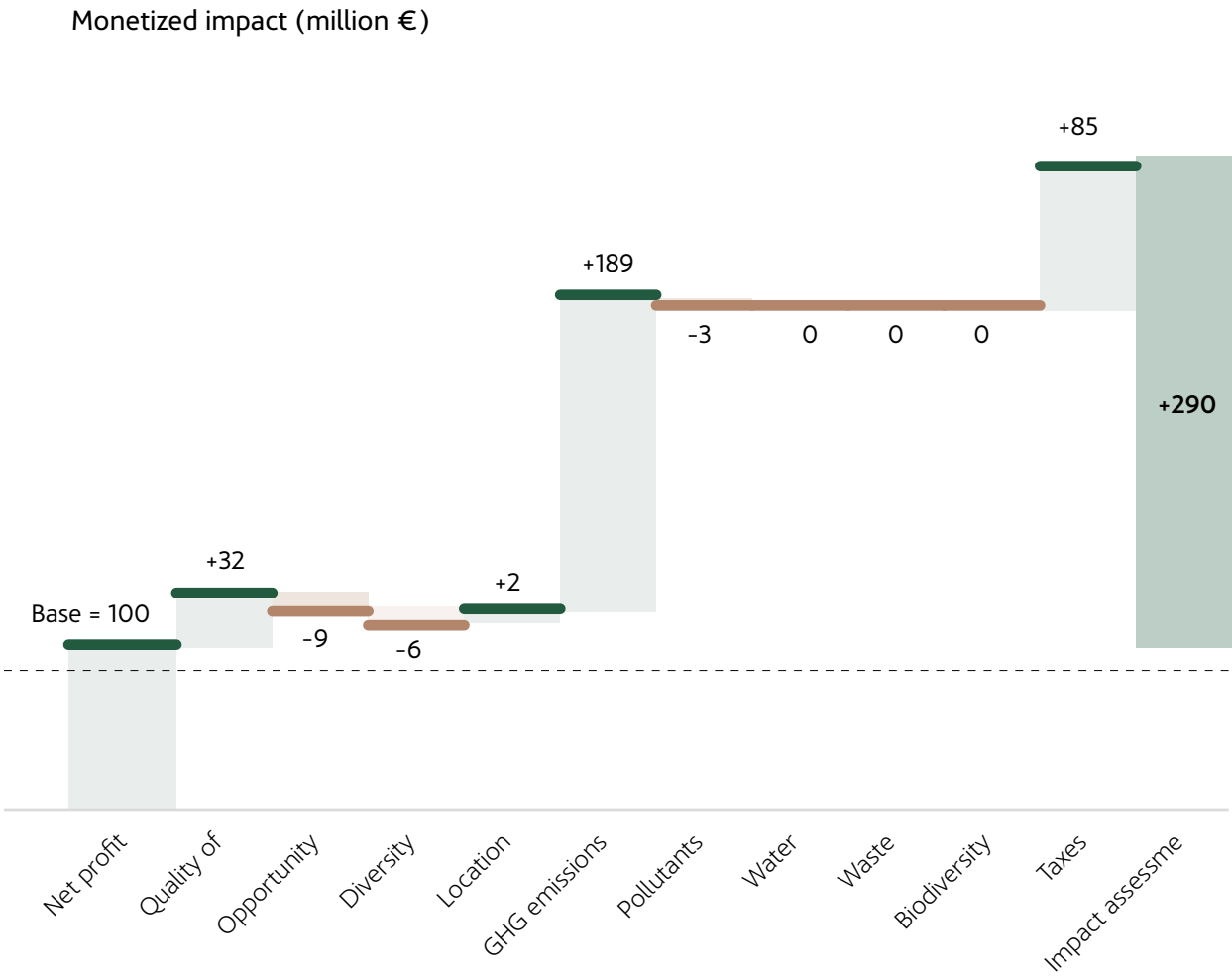
Investors are increasingly demanding information on the quantification and monetary valuation of the impacts deriving from business activities. Harvard Business School launched its [Impact-Weighted Accounts Initiative](#) (IWAI) in 2019, which develops a methodology allowing the financial, social and environmental performance to be reflected in a transparent manner, useful both to investors, and for the management of the company itself.

ACCIONA Energía joined this initiative in 2021 conducting the first exercise for monetizing impacts. It carried out this exercise again in 2022 to monetize the company’s externalities at consolidated level. This involved calculating the social externalities using the Harvard methodology, and the environmental externalities using a variety of monetisation factors disseminated in the Environmental Prices Handbook (EU 28 version) and True Pricing, amongst other references.

With these calculations, the company has obtained the monetary value of the impact generated in society by ACCIONA Energía activities in the last year. These calculations provide a single, comparable measurement that can assist in decision-making when there are trade-offs between various impacts. The graph shows the monetised value of the positive and negative externalities, which are added to or subtracted from the net profit.

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→ ESTIMATED ANNUAL MONETARY VALUE OF THE IMPACT OF ACCIONA ENERGÍA IN 2022, ACCORDING TO THE IWA METHODOLOGY (ON THE BASIS OF NET PROFIT)



Erratum: This chart has been substituted for the one published in the EINF due to an error in the units.

The externalities taken into account to calculate the value of the impact generated are:

- Quality of salaries paid to its employees, adjusted according to each country's minimum living wage and the gender salary gaps.
- Difference in opportunities between men and women when occupying senior positions.
- Similarity between the diversity of demographic distribution of the workforce and the demographic distribution of the local population in each country.
- Creation of local employment, based on the hypothetical rate of unemployment without the presence of the company.
- Emissions avoided as a result of the activity and generated throughout the value chain.
- Emission of contaminants such as NOx, SOx and PM10.
- Drinking water consumption, drinking water production and waste water treatment.
- Waste generation.
- Occupation and transformation of habitats and their restoration.
- Taxes borne.

It is estimated that the company's activity contributes annually a direct benefit of almost €3 billion, taking into account the monetised impacts. This added value is due principally to the quality of the wages paid, the greenhouse gas emissions avoided (65% of the impact value) and the economic contribution to society through tax payments.



# 04

# PEOPLE CENTRIC

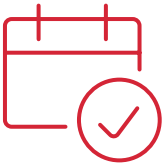
PEOPLE	27
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TRANSFORMATIVE ENVIRONMENTS	43
LEADERSHIP	52
ACCESS TO RIGHTS	54

# OUR ADVANTAGE COMES FROM PEOPLE

ACCIONA Energía seeks to develop a business proposal centred around people.

	01	02	03	04	05
	RECOGNITION	DIVERSITY	ENVIRONMENT	LEADERSHIP	RIGHT'S ACCESS
RESPONSIBLE	IDENTIFICATION OF CRITICAL POSITIONS	LIVING WAGE	ZERO ACCIDENTS AMBITION	TRAIN FOR CHANGE	DUE DILIGENCE
RESILIENT	INTERNAL TALENT MOBILITY	ZERO GAP	SMART WORKING	VISIBILITY FOR TRANSFORMING LEADERSHIP	EVALUATION AND AUDITS
REGENERATIVE	RECOGNITION ALIGNED WITH IMPACT	INCLUSIVE BOOST	COLLABORATIVE AND HEALTHY ENVIRONMENTS	EXPOSURE TO REGENERATIVE CHALLENGES	SHARED VALUE
	Enhance the model for greater recognition of excellence and outstanding effort	Be more diverse to be better	Have a smart and secure workplace, a reflection of our values	Development of agents of change able to contribute a competitive edge	Ensure compliance with the fundamental rights of the people participating in our value systems

## KEY MILESTONES 2022



Data processing in selection procedures at international level that enable optimisation and management of the selection (Workday and LinkedIn)

Signing equality plans in Spain in ACCIONA Energía and in the Energy Services, generating new initiatives that promote gender diversity in each activity making up our business.

Getting WIRE (Women In Renewable Energy) off the ground, a meeting point for contributing to the development of key leadership skills.

Advancement of a programme to promote gender diversity (IWAT) and increase the percentage of women in executive and management positions.

Collective negotiation and signing an agreement to achieve the effective integration of the EROM group of workers (operation and maintenance of renewable energy assets) in Spain.

Expanding the business into new territories, bringing in people with the necessary skills (Brazil, France and South-East Asia).

To continue offering assistance in all policies and practices in new workspaces (Campus in Madrid, Brazil, USA and Australia) with special emphasis on intensive training in Sustainable Development Goals (SDG) and productivity.

Negotiation of the Collective Bargaining Agreement applicable to Energy workers in Spain.

Reviewing the organisational structure in the Energy Services business to adapt it to the current context and strategy, analysing both the organisational level and the family, mission and functions of each position in that organisation.

Unification of the performance status, talent review and salary review processes, with the aim of speeding them up, coordinating results and digitalising them within the Workday platform.

To continue increasing the percentage of women in executive and management positions, and also the use of existing programmes aimed at increasing the ratio of disabled people forming part of the workforce.

Extending the Top Employer certification to operations in Chile and South Africa.

## MAIN CHALLENGES 2023



People

The recent crises have demonstrated that companies that include a clearly defined proposal tend to be more resilient. They face uncertainties more assertively and are able to overcome them, reducing their negative effects and creating solutions that have a positive impact on society and the planet. Similarly, it is seen that people place increasingly more value on businesses taking social and environmental commitments into consideration, in line with their own personal aspirations.

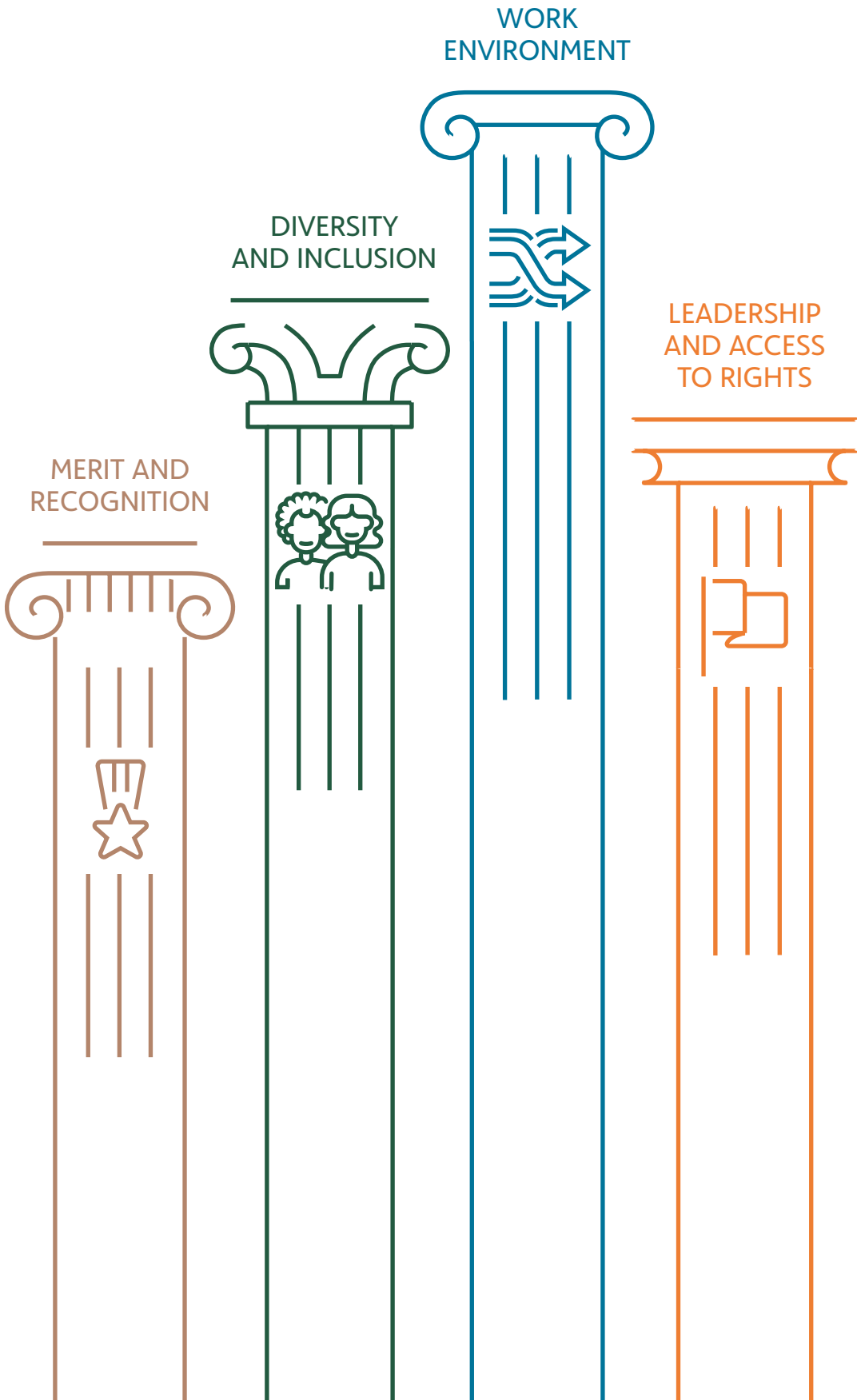
The reality is complex and challenging, and resilience has to be developed to handle changes and to prosper over the long term. To address the new challenges of sustainable development it is vital that the purpose of any organisation is connected to people and involves them, making them feel that their contribution to that shared commitment is valuable.

As a company, ACCIONA Energía aspires to create a positive impact in everything it does, developing regenerative infrastructure solutions that will make a sustainable future possible. We can only aspire to this if we have the talent, the leadership and the commitment of our people.

PEOPLE is the global strategy mapped out to put people at the centre through five fundamental pillars: recognition of merit, diversity and inclusion, a transformative workplace, leadership and access to rights - with clearly defined objectives and on the same level as those for the economic and environmental aspects.

The PEOPLE strategy links the company’s purpose with people, activating it so that it forms part of the employees’ experience and investing to include and advance the best diverse talent. With this, the organisation becomes stronger and more streamlined to face the challenges and opportunities that entail achieving real change and leading the transformation toward a sustainable future.

→ THE BEST VALUE PROPOSAL FOR PEOPLE



Recognition of merit

Recognition of merit contributes to strengthening company values, as it enhances the contribution of each individual and their connection with the shared purpose. ACCIONA Energía promotes new forms of recognition that align the aspirations and priorities of people with the organisation’s purpose.

Through the pillar of recognition, the aim is to reward the attitude and proactivity of the people who make an exceptional contribution to realising the company’s purpose. To this end motivating and personalised experiences are outlined in which employees can develop while feeling that the company values their contribution and it forms part of greater purpose intended to leave a positive footprint on society and on the planet.

PROFILE OF ACCIONA ENERGÍA’S HUMAN TEAM

ACCIONA Energía closed 2022 with an workforce averaging 2,354 employees, of which 27.7% are women. All in all, a total of 46 nationalities with presence in 20 countries across 5 continents.

→ BREAKDOWN OF THE TOTAL WORKFORCE BY GEOGRAPHY %



→ EVOLUTION OF MANAGEMENT INDICATORS

	2021	2022
Revenue (million euros)	2,449	4,351
Workforce cost/revenue (%)	6%	5%
Revenue/workforce (euros)	1,403,748	1,848,278
EBITDA (million euros)	1,086	1,653
Workforce/EBITDA cost (%)	14%	13%
EBITDA/workforce (euros)	616,345	702,183
Workforce cost (million euros)	150	210

DEVELOPMENT AND PROMOTION OF TALENT

ACCIONA Energía’s people management is supplemented by policies and initiatives designed to optimise employee performance, enhance their professional development in the company and manage objective-based compensation. The ACCIONA Energía Performance Management Model is based on two tools: My Development and Performance Status.

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Critical	Gradual loss of market share due to not having the best talent	Reduction of the operating cost through design efficiency

Performance Status

ACCIONA Energía has carried on applying the identification process of performance and potential, Performance Status, as a way of providing a comprehensive view of internal talent and enabling decisions to be made and action plans to be designed on the basis of the needs detected. This process takes place on an annual basis in all ACCIONA Energía countries and businesses.

In 2022 ACCIONA Energía USA was launched, a pilot for the new Performance Status – Talent Review and Salary Review Project intended to unify those three procedures and digitalise them through the Workday employee platform. The 2023 target is to implement it globally throughout ACCIONA Energía.

This year, a total of 2,243 professionals from all countries formed part of the Performance Status scope group.

→ EMPLOYEES SUBJECT TO THE PERFORMANCE STATUS PROCESS BY GENDER AND PROFESSIONAL CATEGORY

	WOMEN	MEN	TOTAL
Executives and Managers	153	428	581
Technical staff	365	733	1,098
Support staff	36	4	40
Operators	18	506	524
TOTAL	572	1,671	2,243

Development Programmes

These programmes further the development of ACCIONA Energía associates and are aimed at the groups identified as being of high performance and potential. The scope of the programmes is global and depending on their category within the company, is specified as:

- **Programme for Technicians II:** designed jointly with ESADE business school to train the participants with key competencies and skills to continue developing their professional career. The programme has two parts, a self-assessment questionnaire and six themed sessions perfield. In 2022, 14 ACCIONA Energía professionals participated at global level.

- **Career fast-track programme:** the purpose of this programme is to promote the developmentand fast-track the career of professional women in Technical Group III, Level 4 who have obtained good results consistently over time and are identified as having high potential. The programme consists of five sessions for each of the key competencies plus an on-the-job action session, with the option to participate in a mentoring process. In 2022, 2 ACCIONA Energía professionals participated.
- **New Manager Programme:** co-designed with the joint venture of Financial Times and IE Business School to equip participants with the skills and tools to develop new ways of working in their new role, providing them with a level of knowledge and development of competencies in the field of leadership, innovation, persuasion and global business vision. At the end of the programme they can participate in a *mentoring* process. 13 ACCIONA Energía managers have participated in this edition.
- **WBCSD Leadership Programme:** A programme aimed at profiles which occasionally represent the company and seek to strengthen or broaden their discourse on Sustainability.
- **Global Development Programme for Managers (GDM):** a programme for the development of skills aimed and second and third line managers in all countries except Spain, intended to strengthen the management skills and leadership of this group. In 2022, 134 employees participated.
- **Global Executive Programme (GEP):** a programme intended to share knowledge with internal and external experts and reflect the influence of the company on business and leadership. In 2022, five ACCIONA Energía employees participated, obtaining a programme certificate created jointly between the IE Business School – Financial Times and ACCIONA.
- **iSEP, International Skills Enhacement Programme for Managers:** a continuity programme for the management team co-designed between the IE Business School – Financial Times and the academic committee of the ACCIONA University. In 2022, a total of 185 ACCIONA Energía managers participated, of which 55 are women.

Internal mobility

The commitment to internal mobility promotes the availability and efficient placement of talent, and matching individuals to jobs, thus contributing to the motivation, development and career progress of the ACCIONA Energía group of employees.

The main aims of the corporate framework of mobility are:

- 1. To foster a common culture as a company that offers equal opportunities of development in different sectors, positions and geographic locations in a transparent manner, in order to implement its diversification and internationalisation strategy.
- 2. To develop a route for internal promotion instead of external recruitment, thus conserving internal expertise, and promoting the economic and operating efficiency.

As a result of the centralised visibility enabled by the internal mobility portal of all the vacancies published, the communications issued focusing on mobility and the weekly newsletter that includes the major job offers, the number of applications from workers for vacant posts from employees exceeded 600 this year.

PAPERLESS APPRENTICESHIP PROGRAMME, EVERY SHEET COUNTS

With the Paperless programme, ACCIONA seeks to increase the use of the technological tools and digital skills of its employees.

At the same time, paper consumption is reduced throughout the organisation in response to the call for the shared responsibility indicated in the SDG and paves the way for an effective management of space which allows storage to be reduced to the strictly essential.

To date, 282 people have participated in ACCIONA Energía resulting in 18,939 kilos of paper saved.

REMUNERATION POLICY

ACCIONA Energía considers remuneration as an element having an impact on the development and wellbeing of the societies where it operates.

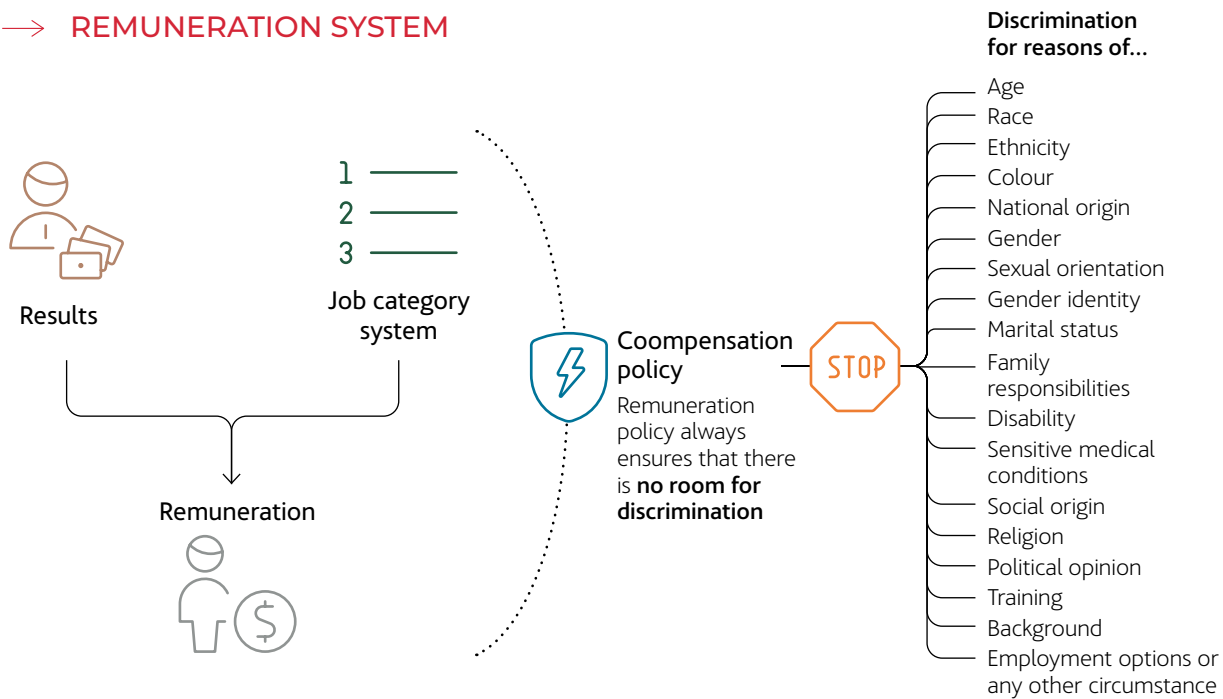
ACCIONA Energía engages in its business in 20 countries and in all of them it rewards its employees according to the following criteria: sectoral and geographical competitiveness, internal equity and merit. In addition, based on current legislation, employees’ pay is subject to the applicable collective bargaining agreements. In 2022 the company managed 28 agreements in Spain.

The strategy of maintaining a competitive compensation system is reflected in the Remuneration Policy, which seeks to establish a remunerations scheme suited to the dedication and responsibility assumed by people in order to, on the one hand, attract, retain and motivate its employees, and on the other, to contribute to ACCIONA Energía’s meeting its strategic targets within the framework in which it engages in its business.

Taking the above into consideration, employee remuneration is defined according to results and a job classification system that organises objectively each worker’s contribution to the company. The compensation policy also guarantees at all times that the remuneration policies and practices are not discriminatory on the basis of gender, civil status, family responsibilities, disability, special medical conditions, social origin, religion, political opinions, training, background, employment options or any other condition. In this respect there is no gender-based differentiation and any decision on individual payment review is approached objectively, ensuring that the compensation is fair in relation to the level of responsibility and the contribution to the results.



→ REMUNERATION SYSTEM



Variable remuneration plan: ACCIONA Bonus

The programme for employees with variable remuneration is based on objective, pre-established metrics. The programme has been in operation since 2012 and depends on the company's financial results, its results in sustainability and the individual goals of each employee.

In accordance with the objectives set out in the Sustainability Master Plan (SMP), the ACCIONA Bonus extends internationally to all divisions and in key countries.

→ ACCIONA BONUS IN FIGURES

No. of employees benefiting	1,917
% of executives	2.5 %
% of managers and technical and support staff	71.6 %
No. of countries	16

→ STANDARDISED STRUCTURE OF TARGETS THAT MAKE UP THE BONUS

ACCIONA ENERGÍA'S OVERALL RESULTS	SPECIFIC TARGETS	INDIVIDUAL TARGETS	CRITERIA LINKED TO SUSTAINABILITY
Represent 5% for all employees and 10% for directors.	Relative to the country, or business unit with its own income statement.	The basis is the individual assessment of performance.	They represent 10% of the targets. The weight of this indicator on the company (not individual) targets was 8% in 2021 and the aim is to increase it to 12.5 % in 2023.

In the ACCIONA Energía bonus, the managers propose the level of achievement of individual targets on a platform that applies to the calculation of the individual part of the bonus. The criterion for this tranche is established according to the personal contribution to the results of the business.

- Specific contributions (individual targets) and the technical excellence in the work that contributes to progress made in the income statement.
- Tasks and objectives planned at the start of the year, as well as any targets or priorities that may have arisen subsequently.
- Support for long-term transformational projects: amongst others, sustainability and digitalisation.
- Contribution to the multidisciplinary and multifunctional work teams.
- Contribution to the results in terms of flexibility and capacity to adapt to the requirements.



CRITERIA LINKED TO SUSTAINABILITY

To include the sustainability and decarbonisation strategy throughout the company across the board, ACCIONA Energía is gradually increasing the weight of sustainability performance in the ACCIONA bonus (generally applicable in the businesses and countries where it is present). The ACCIONA bonus includes sustainability targets in the framework of the sections of the Sustainability Master Plan. In 2021 the weight of the sustainability targets began to be progressively increased, rising from 5% to 8% and in 2022 reaching 10%. The company plans to increase the weight of this Sustainability indicator of the ACCIONA Bonus to 12.5% in 2023 which, if approved, would speed up its fulfilment of the target marked in the 2025 Sustainability Master Plan. The sustainability targets are measured on a global basis and relate to targets such as:

- **People:** health and safety (reducing accident rate indicators, diversity and inclusion and increase in the number of women at managerial and executive level.
- **Taxonomy:** CAPEX brought into line with the taxonomy > 95%.
- **Decarbonisation:** fulfilment of the carbon budget.
- **Leadership:** positioning as leader in the most prestigious rankings and indexes.

Employee benefits

In 2022 the social benefits offered by ACCIONA Energía are:



**Financial coverage** worldwide to employees who were in hospital for COVID-19 more than five days.



**Accident coverage:** covering the commitments undertaken in the different collective bargaining agreements applicable and in accident policies insuring expats and their families in case of an incident that causes death or absolute permanent disability.



**Life assurance:** insuring the commitments assumed in collective agreements in case of death or disability for any reason.



**Travel assistance:** covering professional travel globally for periods of less than one year. For expatriates and their families, it is complemented with a health insurance policy for expatriates.



In addition, the Flexible Remuneration Plan enables optimising salaries of the group's employees on a national level. They can select, acquire and/or contract certain benefits with significant advantages which will allow them to maximise their remuneration. The following products and services are adapted to their needs: medical insurance, meal and child-minding vouchers, transport passes, training programmes linked to their professional development and share-purchase schemes to encourage participation in the ACCIONA Energía share capital.

**In 2022 ACCIONA Energía made the following benefits available to its employees:**



Medical insurance for employees, their partners and children.



Meal vouchers for those who are not currently making use of a staff canteen or similar benefit.



Childminding/creche vouchers for employees with children under the age of 3 who require that service.



Transport cards for any employees who have to buy their public transport tickets or passes (bus and underground) with a tax-exempt card within the limits established by law.



Education and vocational training programmes throughout 2022 in which employees their job and career advancement.



Shareholder Scheme aimed at all ACCIONA Energía employees in Spain.



Life Insurance and Accident Insurance: in 2022 as a new item the possibility was included of contracting two new products without tax benefits from the tool which manages products contracted under the Flexible Remuneration Plan. Both products will be complementary and additional to any insurance cover defined by ACCIONA Energía for its professionals.

The current Shareholders Scheme is intended to facilitate employee participation in the company's shareholding. This is a voluntary programme that allows part of the variable and/or fixed monetary remuneration to be redistributed up to a limit of €12,000 per year by giving company shares in accordance with regulations in force, which provides tax benefits for this type of scheme. This scheme is aimed at all ACCIONA Energía employees who are tax residents in Spain to be able to hold company stock.

In 2022, the number of ACCIONA Energía employees eligible for this scheme in Spain was 1,048. 314 people have participated in the Shareholders Scheme, which is a 182% difference compared to the previous year (172 employees in 2021).

A total of 66,020 shares were handed over under the ACCIONA Energía Shareholders Scheme.

SELECTION POLICY

The selection function is intended to attract the best talent at the right moment, creating innovative and competitive strategies to position ACCIONA Energía as a reference employer and offer a differentiating experience to our candidates. The function is based on 4 key pillars:

- **Brand as employer.** ACCIONA Energía’s reputation as employer is framed in the commitment to sustainable employability, the early identification of talent, investment in the development of our employees and creating opportunities on an international level. ACCIONA Energía has renewed the Top Employer certification which acknowledges the company as one of the best companies to work for in Spain and it has obtained the certification in Canada, United States, Brazil, Mexico and Australia, Chile and South Africa, as well as obtaining the continental seal in North America.
- **Channels for Attracting Talent.** ACCIONA Energía is positioned as a benchmark company in the main channels for attracting talent globally. The organisation designs innovative strategies that ensure the visibility of its global and local offers, responding to the extensive portfolio of profiles and to its commitment to diversity and always connected to the market to identify trends and best practices.
- **Selection Methodology.** ACCIONA Energía uses the same methodology globally ensuring consistency and high quality standards in all of its processes.
- **Candidate’s experience.** The company evaluates people, connects with talent and appreciates diversity. Accordingly it continuously reassesses its processes, placing the candidate’s experience at the centre.

The model for creating a global reserve is the response to the needs of ACCIONA Energía in the medium and long term, attracting talent from the beginning of the employee’s professional career to create an environment of opportunities that promote development within ACCIONA Energía.

Different programmes have been developed that implement this model:

- **Academy Programme:** in which young students have the opportunity of extending their network by coming into contact with ACCIONA Energía employees for training in soft skills and concepts of sustainability through practical challenges adapted to the company’s actual situation. In 2022 four new editions were used in Spain, Mexico, Chile and Peru.

- **Scholarship programme:** its purpose is to put into practice the knowledge acquired at university and have an opportunity to start their professional career in the company. 58 trainees were incorporated in 2022.

GLOBAL GRADUATES PROGRAMME

The programme is aimed at recent graduates (with up to two years’ employment experience), for them to achieve a postgraduate qualification, given by a business school, which provides the knowledge, skills and tools for identifying and extracting the maximum benefit from their potential in the first stage of their professional life.

Once the first year in the company is completed, the graduates begin a postgraduate course given by ICADE, which provides the graduates with the knowledge, skills and tools for identifying and extracting the maximum benefit from their potential in this first stage of their professional life.

Training is divided into four modules (Finance & Strategy, Project Management, Sustainability and Future Societies) through which they acquire background knowledge and cross-cutting skills to put into practice in any professional context of ACCIONA Energía.

In total, 22 graduates participated in the third edition of this global programme which was concluded in October 2022.

→ EVOLUTION OF NEW HIRES  
(No. of employees)

2020			2021			2022		
Men	Women	TOTAL	Men	Women	TOTAL	Men	Women	TOTAL
152	53	205	264	128	392	308	159	467

DIVERSITY AND INCLUSION



→ DIVERSITY AND WORKING CONDITIONS

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Increase in operating cost</li><li>• Regulatory burden</li></ul>	<ul style="list-style-type: none"><li>• Reduction in operating cost</li><li>• Increased revenue</li></ul>

Organisations are aware of the value of diversity in terms of results and social justice. There has been great progress, but there is still much work to be done. Even though there is diversity in an organisation’s workforce, the inclusion understood as the ability of the teams to convert diversity into results does not take place spontaneously.

We know from previous crises that the key component of the strategy for recovery and for overcoming them is resilience. Resilience makes it possible to broaden the perspective of an organisation vis-a-vis the disruptive effects of the crises and to identify assets that signify opportunity, recovery and sustainability in their workforce. Accordingly, and particularly inclusion- are an essential part of the strategy, as they contribute to creating resilient organisations capable of anticipating change and generating innovative solutions for responding to complex environments in constant evolution.

It is possible to face the challenges of sustainable development through the talent, commitment and leadership of individuals. ACCIONA Energía understands diversity as the source of talent which provides key competitive advantages for making a difference. It also considers equity and inclusion to be priority issues in managing people and assets, indispensable for promoting sustainable development, the defence of human rights and fulfilment of the 2030 agenda.

The incorporation of the Policy on Diversity, Equity and Inclusion into the people management model, consolidates the commitments assumed by the company to developing diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion through equity and inclusion.

The policy on Diversity, Equality and Inclusion, the policy on Human Rights and the Code of Conduct of ACCIONA Energía promote real equal opportunities and do not tolerate any type of discrimination in the professional sphere for reasons of age, race, ethnicity, colour, national origin, gender, sexual orientation, gender identity, marital status, family responsibilities, disability, sensitive medical conditions, social origin, religion, political opinion, training, background, employment options or any other condition.

The Management of Diversity and Inclusion at global level and the people responsible for the department of Diversity and Inclusion in businesses make up the organisational structure responsible for introducing, reviewing and supervising compliance with this policy, promoting actions in Equity and Inclusion and ensuring the attainment of targets.

SUSTAINABLE DIFFERENCE

ACCIONA Energía’s 2,354 employees of 46 nationalities contribute to developing the capacity to anticipate situations, resolve problems, and adapt to the challenges of changing environments in the 20 countries in which the company operates. Our business model enables us to work closely with our customers, stakeholders and local talent.

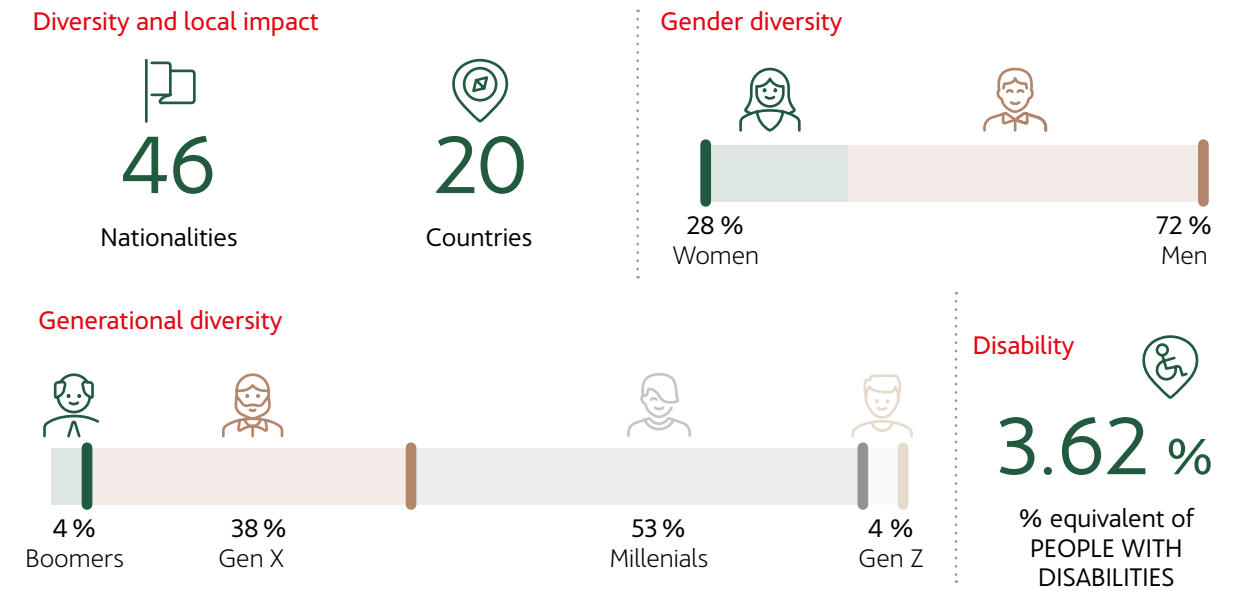
Monitoring and reporting systems use digital tools to continuously improve diversity indicators and make this information available to managers on a real-time basis and linked with their people objectives. This enables managers to effectively monitor the diversity of their teams and to track the attainment of targets. 2022 saw further advances in data quality and the identification of new indicators that enable company managers to take informed data-based decisions that will increase the resilience of their teams and enable them to thrive in every environment in which they operate.

Gender diversity

ACCIONA Energía promotes the full inclusion of women and their leadership. It is important to bear in mind that the company operates in activities in which women are under-represented, it is important to develop initiatives that contribute to creating a more gender-equitable workplace.

The company therefore promotes an inclusive culture based on conduct that contributes to removing barriers to equal opportunities. Policy in this area is continuously reviewed and specific programmes are developed where necessary to help attract, retain and promote talent at different stages in women’s professional careers.

→ ACCIONA ENERGÍA HAS 2,354 PEOPLE



PROGRAMMES TO PROMOTE WOMEN'S LEADERSHIP

01

**Global programme to fast-track women with potential.** In 2022, two women participated in the third edition of this programme. The programme aims to promote and fast-track the career development of the company's female professionals occupying pre-management positions. The programme consists of five sessions for each of the key competencies, an on-the-job action session, and mentoring.

02

**"Aprendízate" programme.** Created in Spain to develop skills and competencies, the programme is designed for women with technical profiles. 146 ACCIONA Energía professionals completed the programme in 2022.

03

**High-Potential Women's Development Programme (HPWDP).** Created in collaboration with the EOI Business School, this programme is aimed at women with a clear career potential in the company. In the new 2022 edition, seven employees successfully completed the programme.

04

**International Women Acceleration Training (IWAT)** was launched in 2022 and five female junior managers participated in the first edition. This global programme aims to advance the careers of female professionals by representing the international reality of all businesses. The programme was co-designed as part of a strategic alliance between ACCIONA Energía's strategic alliance and Florida International University and Nebrija University.

05

**Global mentoring programme for pre-executive women.** Three female senior managers took part in the second edition of this programme aimed at promoting talent and leadership among ACCIONA Energía's female employees.

In terms of recruiting, in 2022 ACCIONA Energía has promoted taking on women or guaranteed the inclusion of at least one woman's CV in all selection processes.

These actions are aligned with the set objectives, to increase the number of women in management and executive positions, achieve equal pay and promote women's leadership programmes. Meeting these objectives is linked with the bonus, so that it impacts directly on the variable remuneration of all the people in the company that benefit from it.

All the actions carried out in 2022 have led to a significant increase in the presence of women in leadership and management positions at a global level, with women now representing 26%, as opposed to 23% in 2021.

→ WOMEN IN ACCIONA ENERGÍA

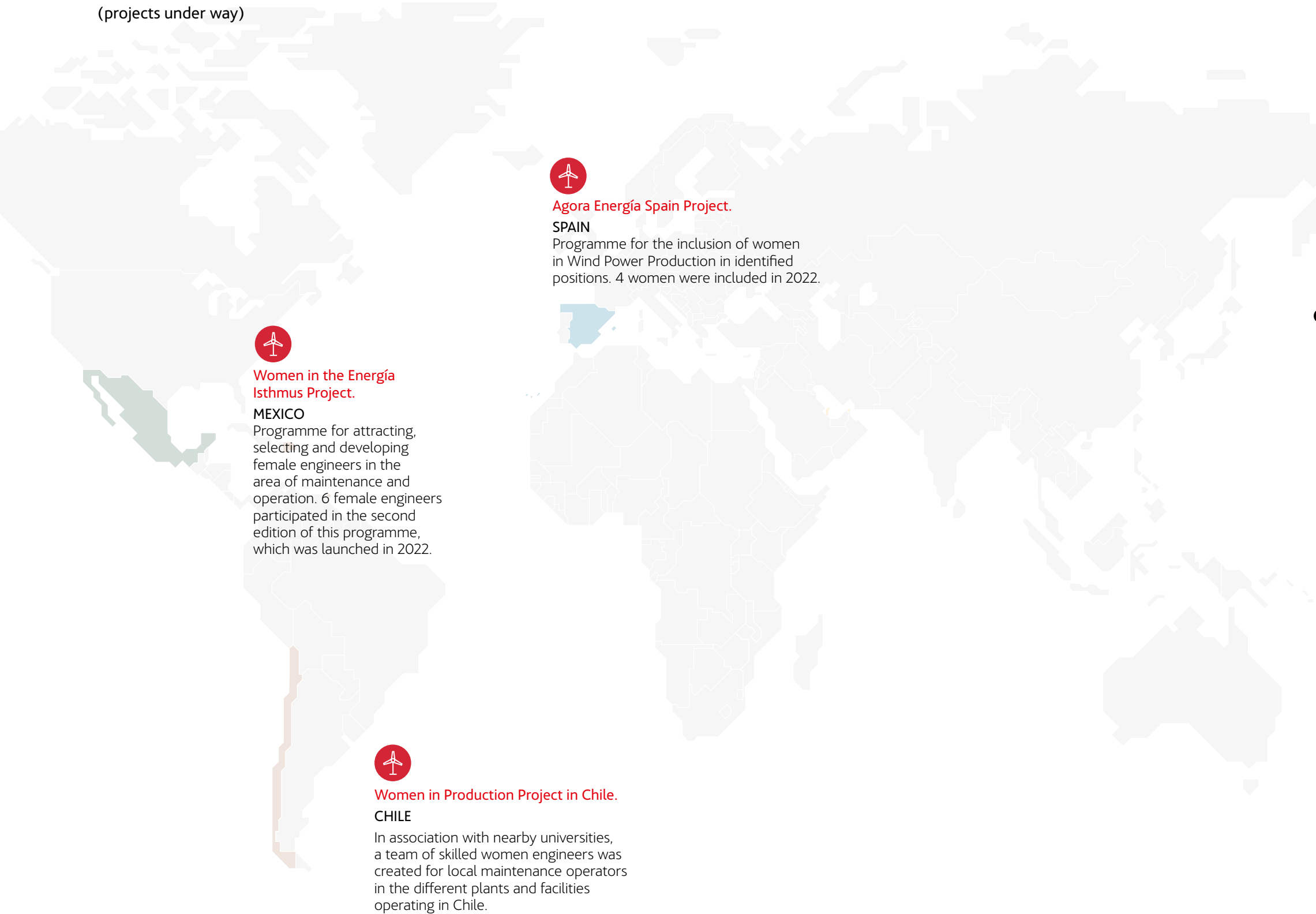
	2022
% Women in the workforce out of the total workforce	27.68 %
% Women in executive and management positions out of the total executive and management positions	25.96 %
• Female executives	19.18 %
• Female managers	26.72 %
% Female junior managers out of total junior managers	28.46 %
% Female executives and managers in business-generating positions (Areas of production and business development)	19.47 %
% STEM women out of the total STEM people	24.11 %
% Women in technical positions out of the total technical positions	34 %
% Women out of the total of qualified employees	31.4 %

SUSTAIN@BLE 50:50

ACCIONA Energía's "Sustain@ble 50:50" projects are intended to actively promote female participation and leadership in company activity and production centres. To this end, the company implements reskilling/ upskilling policies and programmes, which allow:

1. Identifying local female talent and promoting internal talent to key positions.
2. Reconvert profiles to site qualified staff and offer employment opportunities.
3. Improving female employability to introduce them into key sectors of the economy.
4. Generate models replicable by other women, contributing to eliminating still persistent stereotypes regarding female presence in certain activities.

→ SUSTAIN@BLE 50:50  
(projects under way)



1  
Letter from  
the Chairman

2  
Only in  
renewables

3  
Sustainability  
and materiality  
governance

4  
People centric

5  
Planet  
positive

6  
Exponential  
leadership

7  
Integrate  
to transform

8  
Impact  
per region

9  
Appendices



In Spain, all the businesses are covered by Equality Plans, in accordance with Organic Law 3/2007 for effective equality between men and women, signed with the most representative trade unions and in which the results are reported and evaluated jointly every six months. All the Equality Plans are published and are also available on the intranet for everyone in the company.

To endorse the commitment to effective equal opportunities, communication and awareness-raising initiatives are carried out, giving visibility to the company’s professionals and projects led by women, in recognition of their leadership and their role as a reference.

ACCIONA Energía, as part of ACCIONA, is a signatory of the “Women’s Empowerment Principles” of the UN Global Compact, an initiative that pursues real and effective gender equality through work with seven action principles in the labour, social, training, as well as health and welfare fields.

As a corporate partner of the Global Compact, in 2020 ACCIONA adhered to the Target Gender Equality project to speed up the contribution to SDG 5 which sets out the need to achieve gender equality.



Analysis of salary equality

In 2022, ACCIONA Energía remained committed to eliminating the gender pay gap. To this end, the company has established an action plan which includes the following:

- Periodic analysis of gender equality indicators to identify unequal gender remuneration situations through review processes in each business area.
- Periodic monitoring of the company's orientation and direction, in which each business unit, country and organisational level is assessed in terms of progress in eliminating any potential gender pay gap.

Gender pay gap analyses employ a global and weighted methodology based on international best practices. According to the definition of “equal pay”, the analysis isolates all variables that might explain a person’s salary above and beyond gender. The process takes into account the variables of country, business, professional classification and applicable collective bargaining agreement. A level map is also used to group business and support roles. Management level was broken down according to reporting level (D1, D2, D3, D4 and D5), thus isolating possible deviations.

This estimate determines standardised segments of population (comparison clusters) on which salary differences between men and women are measured, providing a high degree of reliability in which gender pay gaps are effectively addressed.

The following formula is used to determine equity in each segment:

Equal pay  
per segment

=

average fixed  
salary for men

—

average fixed  
salary for women

average fixed  
salary for men

For the calculation of the overall gender pay gap, this indicator is weighted according to the weight of each of the groups (comparison cluster).

In 2022, ACCIONA Energía reported a gender pay gap between men and women of 1.58% at global level.

→ GENDER PAY GAP ANALYSIS

2021	2022
-1.8 %	1.58 %

The variation in the gender pay gap ratio is justified by ACCIONA Energía’s inorganic growth in 2022, with the integration of EROM into the company’s structure.

With this information, the data is studied for each business line and level of responsibility to define whether there is unequal pay for equal work or if the difference is due to any other cause (seniority, performance, results, etc.). The objective is to eliminate any cases of gender pay inequity that may have been identified.

A specific inequitable remuneration analysis is also carried out each year through the salary review process. This action plan is periodically monitored by management, which assesses the progress being made at each level of the organisation.



Inclusion of people with disabilities

ACCIONA Energía offers energy transition solutions with value for all people; the company is committed to creating inclusive and barrier-free environments that facilitate participation and equal opportunities for people with disabilities.

In order to contribute as much as possible, ACCIONA Energía relies on the talent contributed by people with disability. In this respect, the Sustainability Master Plan has established the objective of increasing the percentage of people with disability in the staff at 5% in Spain before 2025 and at 2% - or always above the legal level - in key countries. To this end, ACCIONA Energía carries out a continuous review of its processes along the following lines:

- Accessibility to company job vacancies.
- Identification of inclusive positions.
- Development of global disability training programmes, awareness-raising workshops, and training to discuss the opportunities and advantages of recruiting people with disabilities. Courses focus on identifying and eliminating attitude barriers.
- Recruitment and welcome with actions beyond job adaptation, with a view to improving the onboarding experience, accessibility to digital content, and inclusion of people with disabilities that ensures participation in the workplace on equal terms.



There were 36 employees in Spain, both directly and indirectly employed, with 33% or more of disability, compared to 27 in 2021. This represents 3.62% of the total workforce, as opposed to 3.2% in 2021.

Direct employment accounted for 1.56%. and the rest comes from the contribution through purchases with Special Employment Centres and donations to third sector organisations,

→ % EVOLUTION DISCAPACITY



Direct and indirect hiring

PROGRAMMES TO PROMOTE THE INCLUSION OF PEOPLE WITH DISABILITIES

01 People Programme= in Mexico:

an inclusion initiative for young recent university graduates with disabilities. As a result of this programme, four young Mexican graduates received specific skills development training and obtained their first job opportunity at ACCIONA Energía. This initiative was made possible through strategic alliances with public institutions.

02 Programme + Diverse + Capable:

a work inclusion programme to promote the employment of people with Down’s syndrome and intellectual disabilities. Although digitalisation has meant that many of the previously held job positions have been discontinued, it has also opened up new opportunities. ACCIONA Energía uses this programme to identify positions that may represent job opportunities for people with intellectual disabilities. The initiative is carried out in collaboration with foundations with expertise in intellectual disabilities, which provide support in the search for profiles and awareness raising training for the teams that receive such employees. Since the start of the programme, three people with intellectual disabilities have been incorporated into the areas of human resources and administration.

The company continues to hold the Bequal certificate, with Bequal Plus rating, which certifies its compliance with the law and ACCIONA Energía’s commitment to inclusive disability policies through an external audit.

ACCIONA Energía is a member of the “Latin American Network of Inclusive Enterprises” which brings together companies committed to disabilities with public and private entities that promote the rights of disabled people. Its objective is to encourage a new business culture that values what diversity contributes to the market and which promotes inclusive working teams.

ACCIONA Energía forms part of the action group “Companies for Equality, Diversity and Inclusion” promoted by Randstad Foundation to trigger mobilisation for the integration of diversity, disability and employment.

Inclusion of minorities and people in risk of social exclusion

ACCIONA Energía does business in 20 countries and, as an employing company, is aware of the role it plays in the communities in which it operates. In accordance with its Code of Conduct and its policies, it respects the rights of the local communities and the people living and working in them in accordance with international human rights rules, making efforts to create positive impacts that improve the life of people in the different areas. To this end, ACCIONA Energía takes part in various programmes to promote the employment of socially vulnerable people.

The most noteworthy initiatives in 2022 in the area of inclusion in the workplace of people with disabilities and other vulnerable groups include:

- Collaboration with non-governmental organisations and institutions that work for the labour inclusion of the most vulnerable groups in the geographies in which the company operates.
- Collaboration with the Companies for a Society Free of Gender Violence initiative since its launch in 2012. As a member company, ACCIONA Energía is committed to promoting workplace inclusion of women victims of gender-based violence, and to this end supports the work of foundations such as Integra and the Red Cross.

A total of 16 ethnic groups form part of the staff of the company. In this respect, ACCIONA Energía encourages local hiring and protects minorities (B-BBEE requirements in South Africa, First Nations in Canada, indigenous people in Australia, and other communities). To promote the labour inclusion of these groups, the company develops specific plans in its projects that include training, awareness-raising, elimination of barriers, employment hiring and collaboration with authorities and institutions.

AWARENESS AND DEVELOPMENT OF DIVERSITY, EQUITY AND INCLUSION SKILLS

As a part of the Policy on Diversity, Equality and Inclusion, training in diversity and inclusion is essential to raising awareness. It provides tools that help to develop skills and behaviours that contribute to removing barriers, fostering mindful inclusive leadership, and creating a workplace where diversity adds value.

ACCIONA Energía undertakes training initiatives on equality, diversity, inclusion, bias, non-discrimination and multiculturalism, through a range of training programmes aimed at creating a more inclusive culture and environment. In 2022 a total of 5,611 hours of training were given on these subjects.

Internal Diversity and Inclusion networks

The company extends good practices throughout the organisation through its internal Diversity and Inclusion networks. Internal employee networks are employee-led groups that promote a diverse and inclusive workplace that is aligned with the company’s mission, values, goals and objectives. One of the major advantages of these networks is their ability to connect people from different locations, organisational groups, functions, departments and levels to create a sense of community and belonging.

Internal Diversity and Inclusion networks:

- Global Diversity and Inclusion Committee: a network that drives diversity initiatives, policies and programmes. This group was created in 2020 and is composed of employees who represent all the groups and act as a network of ambassadors: they collect information from their environment, share the best practices and generate proposals on diversity, equity and inclusion. Its role is to quantify global strategy and adapt it to local reality.
- WIRE Programme (Women In Renewable Energy): an internal ACCIONA Energía network created with the intention of sharing knowledge, developing skills and making women more visible.



## Transformative environments

The work environment is a scenario of opportunity for the transformation of the business culture. It determines the functioning, communication, collaboration and motivation of organisations, and hence their performance. To harness the opportunities the work environment offers, ACCIONA Energía promotes a diverse, inclusive, collaborative and innovative work environment, adapted to emerging work practices and future challenges, with technology as a facilitator.

ACCIONA Energía is committed to safe, innovative, flexible and environmentally efficient work environments to ensure the well-being of its professionals and a positive contribution to the working environment and its surroundings. The 2022 inauguration of the new CAMPUS ACCIONA MESENA MADRID headquarters was a significant milestone for the company: a tangible connection between the organisational culture and the working environment. With this objective in mind, the company is working to extend the CAMPUS ACCIONA MESENA MADRID model to the rest of the geographies in which it is present.

### CAMPUS ACCIONA

ACCIONA's new offices in Madrid were inaugurated in 2022 as CAMPUS ACCIONA MESENA MADRID. All the main buildings are certified to LEED Gold and WELL Gold standards, resulting from a holistic environmental and social management process, which takes into account aspects related to air conditioning, building materials, nutrition, sufficient light, natural views, mental healthcare, optimal thermal comfort, water, adequate acoustics, physical health and movement, community support, innovation and sound.

The ACCIONA MESENA MADRID CAMPUS provides healthy and environmentally friendly workspaces that foster a sense of well-being among all those who work there.

In line with ACCIONA's regenerative purpose, all the buildings of the CAMPUS ACCIONA MESENA MADRID are nZEB (nearly Zero-Energy Building). Campus buildings 6, 7, 8, 9 and 11 use photovoltaic energy, with approximately 1 GWh generated each year. In addition, building 7 uses an air-conditioning system based entirely on its geothermal system.

Gas consumption has been reduced to decarbonise the facility. A system collects and recycles the large amount of heat produced via a DPC (Data Processing Centre) installed on the CAMPUS site prior to its purchase by ACCIONA. The recovered heat is distributed in the form of hot water to several additional CAMPUS buildings and services. Low Global Warming Potential (GWP) refrigerants are used in the cooling systems.

**The electricity supplied to the facilities is 100% renewable. All these measures have achieved a reduction in CO<sub>2</sub> emissions of 2,388 tCO<sub>2</sub>e / year, with a combined saving of 1,260,000 kWh.**

ORGANISATION OF WORKING TIME AND THE WORK-LIFE BALANCE

The company is committed to the integration of personal and professional life as a means of promoting genuine equality, and to that end has family support measures in place, beyond compliance with the law, in the businesses and the different geographical areas where it is present.

A support programme for mothers and fathers has been developed with universal measures and a co-responsibility based approach. The principal measures implemented are:

- Support programme for pregnant women with six-hour working days with no reduction in salary, parking spaces and economic assistance for travel to medical tests.
- Paid parental leave for the main caregiver, above the legal minimum, of up to 19 weeks, which canal so be taken on a partial basis.
- Paid parental leave for the non-primary caregiver, also above the legal minimum, of up to 19 weeks, which can also be taken on a partial basis.
- Programme for parents with children suffering from serious illness, with a part-time working day with no reduction in salary, complementing the legal frameworks in each country.

These measures are complemented with other measures in place such as Home Office, flexible entry and exit times, continuous working hours and the option of part-time working, as well as canteen services, medical centres, breastfeeding rooms, kindergarten allowances, physiotherapy and sports club at the locations. In countries such as Australia, Canada, the U.S. and South Africa there are special measures for flexible working hours after maternity/paternity leave and for childcare, which are higher than the legal minimums.

ACCIONA Energía in Spain has been accredited with the “SELLO RECONCILIA” certification model that recognises companies that actively work for conciliation.

HOME OFFICE

ACCIONA's Home Office model, implemented in ACCIONA Energía in 2021, is part of the PEOPLE strategy to improve working conditions through the introduction of new work models with the triple objective of generating value for employees, the company and society. Employees increase their commitment and gain flexibility, while the company improves its talent attraction, increases productivity and improves efficiency in the utilisation of space. In addition, there has been a reduction in CO<sub>2</sub> emissions associated with reduction of travelling, which benefits society as a whole. In 2022 ACCIONA Energía developed the Home Office pilot launched in 2021, incorporating more employees and reaching over 1,000 people in seven countries (Spain, Brazil, Mexico, Chile, the USA, Australia, Poland), representing more than 87% of the eligible workforce worldwide. The company's commitment to new work models is reflected in its annual climate survey, with a 5% increase in scores for Work Environment and Well-being compared to 2021 (68% very satisfied in 2022, compared to 63% in 2021). The index reflects employee satisfaction with the working environment and the company's active concern for their well-being.



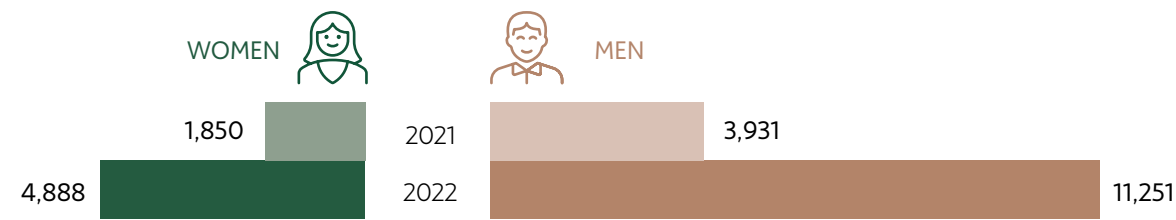
The introduction of information technologies in the employment context has multiple advantages such as increased efficiency and productivity, and improved flexibility. However, it also brings disadvantages that must be addressed and solved. In the framework of the collective agreement in the Energy business, ACCIONA Energía undertakes to respect and ensure respect for the right to digital disconnection in the work environment, in accordance with current legislation.

→ EVOLUTION OF THE RATE OF EMPLOYEE ABSENTEEISM  
% of total

2019	2020	2021	2022
0.95	0.92	1.19	3.21

Absenteeism rate: (no. of days lost due to absenteeism/no. of days worked) x 100.

→ NUMBER OF DAYS LOST DUE TO ABSENTEEISM  
The 2021 figure only refers to Spain. The 2022 figure is for Spain and international.



\* Absences due to accidents, maternity, common illness and COVID illness are taken into account. The figure is reported by hours in compliance with Law 11/2018. The system outside Spain compiles the figures in days. Given the number of agreements in force, the calculation of hours is only an estimate, establishing an average time of 8 hours/day.

EMPLOYEE SATISFACTION AND COMMITMENT

People’s satisfaction and commitment are the key attributes of the relationship model that ACCIONA Energía aspires to maintain with its employees through the PEOPLE strategy. The Engagement & Sustainability Global Barometer, globally carried out every year since 2021, allows us:

- To better understand what helps employees to be more productive to implement the company’s strategy.
- To establish a specific metric system to follow up the evolution of the employees’ commitment. It also enables analysing the correlations between the commitment and the pillars and the objectives of the 2025 SMP and of the PEOPLE strategy.
- To identify support measures based on factors such as the following: knowledge of our critical transformation levers, satisfaction with the SMP key objectives, vision of the strength of the ACCIONA brand locally to attract talent, promotion of a work environment that values diversity and the perception of internal advancement towards an inclusive culture.

The 2022 survey, which used Kincentric methodology, showed that ACCIONA Energía’s global employee engagement stands at 69%. Participation also increased by 58% in the number of responses. Although higher levels of participation usually lead to an increase in critical appraisals, ACCIONA Energía maintains a similar level of employee engagement to previous years.

HEALTH AND SAFETY

→ EVOLUTION OF TURNOVER BY GENDER, AGE AND WORKPLACE (%)

	2021	2022
Turnover among men	5.97 %	6.49 %
Turnover among women	4.53 %	7.13 %
Turnover of people under 31	9.88 %	16.05 %
Turnover of people aged 30-50	5.01 %	5.31 %
Turnover of people over 50	4.04 %	3.65 %
Turnover in Spain	3.14 %	2.20 %
Turnover of people working outside Spain	9.12 %	12.20 %
Total turnover*	5.61 %	7.48 %
Voluntary turnover**	4.95 %	6.67 %
Average hiring cost per employee	1,200€	1,200€

\*Total turnover = total no. of departures/employees.  
\*\* Voluntary turnover = no. of voluntary departures of employees with indefinite contract / employees with indefinite contract.  
Since January 2021 data managed through Workday are taken, which allows the incorporation of a broader type of movements, of people joining/leaving that reflect a more accurate picture of turnover in the company.

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Increase in operating cost</li><li>• Decreased revenue</li></ul>	<ul style="list-style-type: none"><li>• Reduction in operating cost</li><li>• Increased revenue</li></ul>

The possible risks for ACCIONA Energía involving health and safety arise from the activities it carries out in the construction and operation and maintenance of its facilities. For this reason, the company considers it essential to maintain a preventive culture conducive to generating confidence and well-being among all its workers. This consideration extends to both its own employees and those working in the value chain. For this reason, responsibility for health and safety is assumed and shared by each and every one of the people who make up the company.

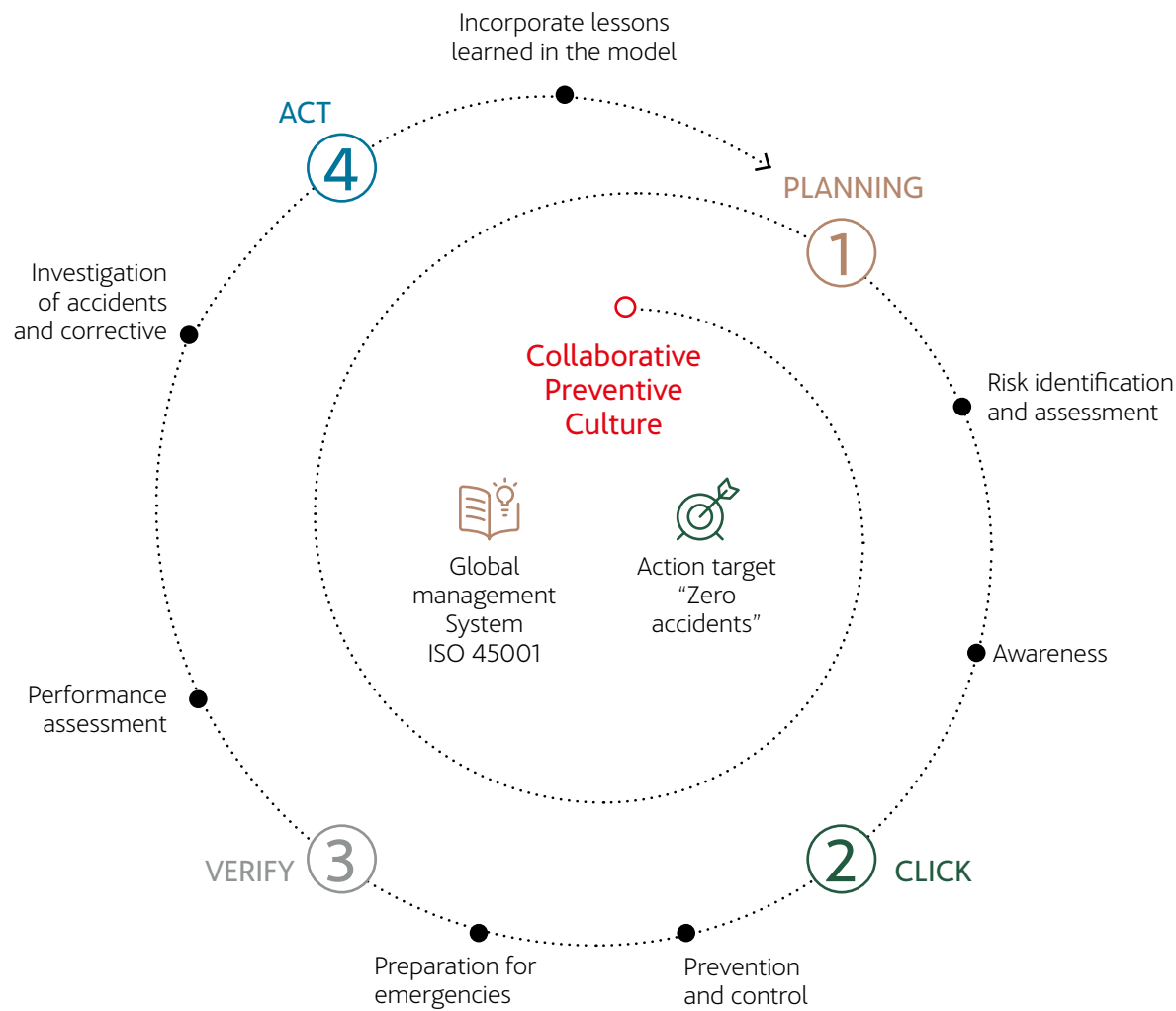
This commitment is based on the [Human Resources and Occupational Health and Safety Policy \(OHS\)](#) included in the Company's Policy Book.

The 2025 Sustainability Master Plan and the People programme establish the lines of action required to meet the company's OHS commitments, with the primary objective of achieving zero accidents. For this objective, programmes are designed to impact on the company's organisational conduct in order to identify and mitigate possible safety-related risks.

ACCIONA Energía has an Integrated OHS Management System for the entire company which establishes the minimum health and safety requirements that should be taken into account in any of its companies and countries. In 2022 the certification in all of its companies in accordance with the ISO 45001 standard was maintained.



→ INTEGRATED ORP (OCCUPATIONAL RISK PREVENTION) MANAGEMENT SYSTEM



SYSTEM FOR IDENTIFICATION AND MANAGEMENT OF OCCUPATIONAL RISK

ACCIONA Energía has a system for identifying and assessing any possible labour-related risks. This assessment and any control measures for minimising the probability of them occurring are documented in specific procedures for each facility. The risk analysis determines the points that are critical in each centre and the associated preventive action, which affects not only its own employees but also those of contractors and firms collaborating with the division.

In addition, the facilities have their own emergency plans with guidelines on how to proceed in emergency situations. Employed or subcontracted personnel can report any hazardous situation they detect by means of an event and hazardous situation management tool (ENABLON). On the other hand, any person that identifies a risk in any of the facilities may communicate it by sending a message to the email address [safety.energy@acciona.com](mailto:safety.energy@acciona.com).

As a highlighted good practice, ACCIONA Energía makes and publishes safety alerts on its web site involving any incidents from which lessons have been learned that could be of interest to the sector

ACCIONA Energía carries on with its commitment to provide a safe work environment as a member of the Global Wind Organisation (GWO) for the promotion of occupational health and safety standards in the wind energy sector worldwide. This platform promotes safe working environments based on the technical qualifications of the professionals working in the sector, especially in countries where the level of training is lower.

The company uses the representative bodies required by the laws in the countries where it operates, such as the Health and Safety Committees in Spain, as a channel for consultation and participation. Employees also have communication tools through which they can report any incidents or possible risks related to occupational safety.

The company has defined and implemented a strict management programme for the safety and health of its contractors, which ranges from OHS criteria with which they have to comply in order to be able to work with ACCIONA Energía, to the mechanisms of planning and control and the assessment of the service rendered. On the other hand, ACCIONA Energía actively cooperates with the Public Administrations, such as the European Agency for Occupational Safety and Health, in initiatives to promote health and safety in the workplace.

Evolution of the principal accident indicators

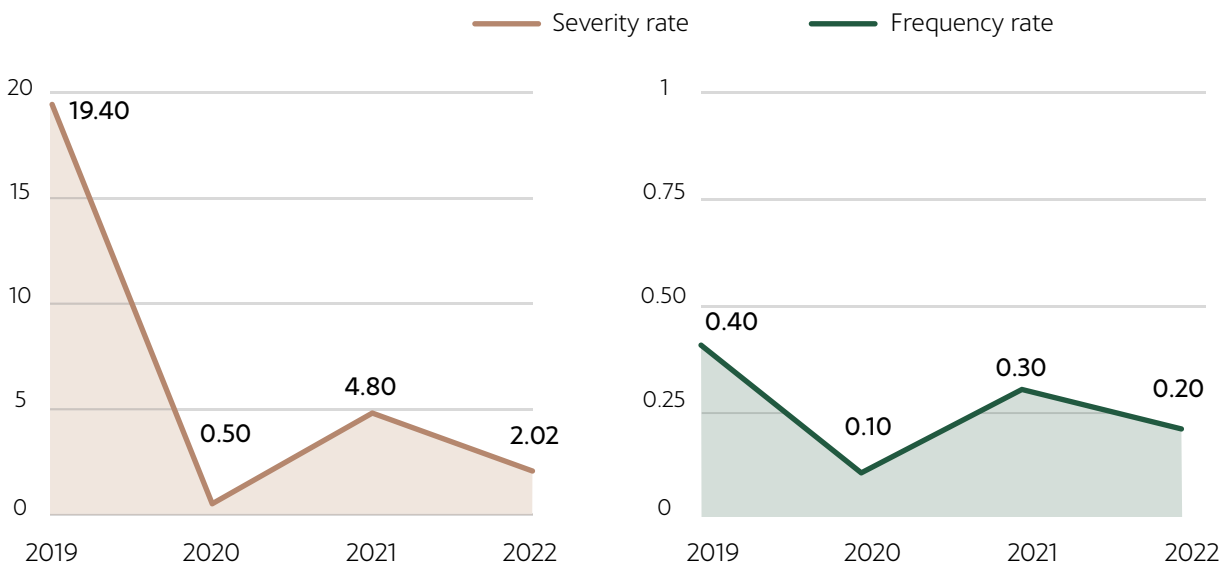
All accidents involved male staff. No women suffered any workplace accidents in 2022.

2022 was the safest year in ACCIONA Energía’s history. The company’s efforts to create a safe working environment resulted in a 24% reduction in the number of accidents, despite 19% more hours worked. In nine of the twelve months of the year, the Monthly Frequency Rate of accidents with sick leave of own and subcontracted personnel was below the annual target (0.54), which confirms the stability of the result.

All Construction and Energy Production activities reduced their frequency rates and met their health and safety targets.

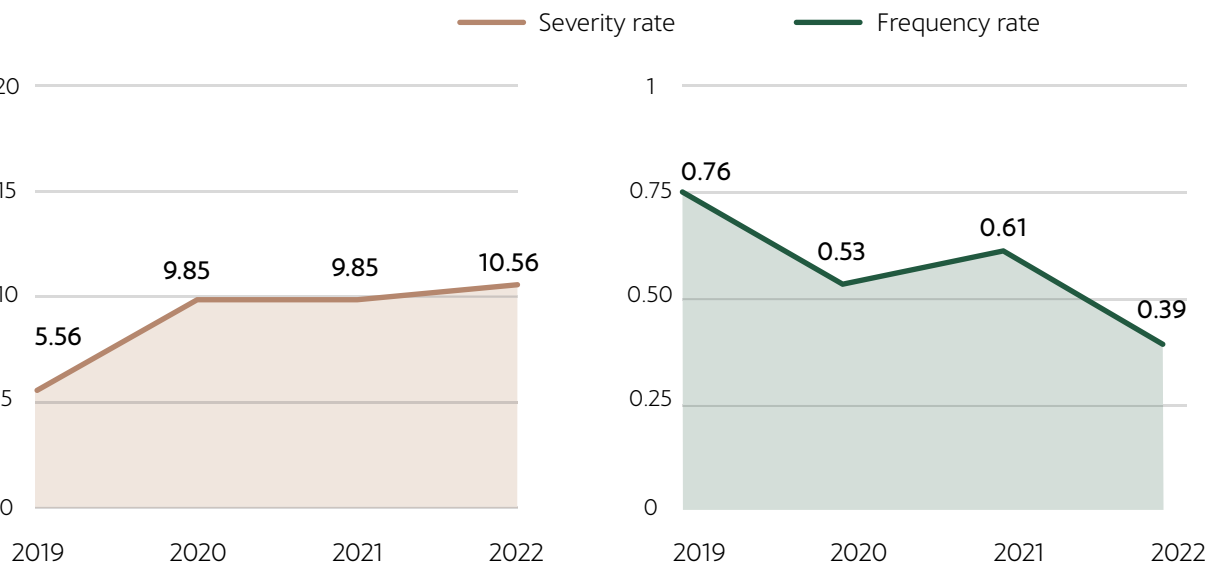
In 2022, the relative percentage of accidents with injury resulting from the most serious risks (e.g., falls from heights and electrical accidents) remains at minimal values, accounting for less than 2% of all reported incidents. Accidents resulting from a lack of risk perception (trips, blows, entrapment, etc.) decreased in relative terms, but still account for the majority of accidents. However, 2022 saw an increase in wildlife-related injuries, due to an increase in minor incidents caused by insect bites in the vicinity of construction sites. As in previous years, no fatal accidents occurred at ACCIONA Energía.

→ EVOLUTION OF ACCIDENT RATE INDICATORS FOR OWN EMPLOYEES  
Severity rate\* and Frequency rate\*\*



\*Severity rate: (no. of working days lost due to work accident/hours worked) x 200,000.  
\*\* Frequency rate: (no. of accidents with work loss/hours worked) x 200,000.

→ EVOLUTION OF THE ACCIDENT RATE INDICATORS FOR OWN EMPLOYEES AND SUBCONTRACTORS  
Severity rate\* and Frequency rate\*\*



\*Severity rate: (no. of working days lost due to work accident/hours worked) x 200,000.  
\*\* Frequency rate: (no. of accidents with work loss/hours worked) x 200,000.

Targets set for 2023:

- Decrease by 15% the average of the last three years of the accident frequency rate with sick leave of employed and subcontracted personnel.
- Extend the DRIVE SAFE programme to all countries where there is an established structure already in place.
- Define and implement a “5E” programme, in which 5 selected recurring Events undergo an in-depth review to analyse causes, define and apply preventive actions, and verify their effectiveness. This programme will begin in the Construction area.
- Develop and advance the health and safety criteria to be applied in the company’s offshore project environment.



ACT SAFE AND BUILD SAFE PROJECTS

The company has two initiatives with a common structure and operation but with their own particular characteristics: Act Safe and Build Safe.

Both initiatives utilise common programmes such as “Preventive Observations”, “Personal Action Plan” and “Rules that Save Lives” and, specifically, we coordinate actions such as training in the “Risk Factor” in operation and maintenance (O&M) of facilities or the “Learning from Major Incidents” programme included in Engineering and Construction (E&C).

Both projects rely on their own Management and Performance Committees, led by the management of both departments with the active participation of the heads of the different businesses.

Key health and safety data in 2022 relating to the scope of its two main activities (Operation and Maintenance; Engineering and Construction) include the following:

+7,000  
Health  
and Safety  
Inspections.

+300  
Emergency  
simulations.

5,790  
Preventive  
Safety  
Observations.

+3,000  
Health and  
Safety Training  
Activities.

+3,000  
Safety  
Contacts.

144  
near-accidents  
reported and  
investigated.

116  
Meeting Points  
with Suppliers on  
Health and Safety.

+6  
“Health and Safety  
Alerts” shared with  
Stakeholders.

5,194  
unsafe conditions  
reported and  
analysed.

Road safety

ACCIONA Energía has a road safety programme with the name Drive Safe for preventing occupational accidents while commuting or on work-related travel. In 2022 the programme complied with the objective of achieving a global scale, and has several action levers, from training requirements for drivers, driving habits and the requirements that company vehicles must have to planning work-related travel.



DRIVE SAFE PROGRAMME

Since 2020, ACCIONA Energía has implemented the Drive Safe road safety programme, which seeks to reduce traffic incidents through driver training, vehicle equipment and safety in the facilities. The programme is managed along three main lines of action: leadership, execution and control.

As a result, the company has achieved an 86% reduction in commuting and work-related road accidents among its employees.

All in all, Drive Safe covers all the risk factors associated with the driver’s preparation, the conditions of the environment and the technical requirements that must be met by the vehicles. The programme is based on three main lines of action - leadership, execution and control - and has already reached more than 1,000 ACCIONA Energía employees in Spain, Chile and Mexico.

The European Road Safety Charter, led by the European Commission, presents the annual Road Safety Excellence Awards in Brussels to recognise initiatives that contribute to improving safety on Europe’s roads. ACCIONA Energía won the 2022 award in the Professional Drivers category for its Drive Safe programme.

As a result of the implementation of the Drive Safe programme, there has been a drastic reduction in road accident rates among ACCIONA Energía’s workforce. In 2022, the company reported two commuting accidents and no work-related accidents.

→ EVOLUTION OF COMMUTING AND WORK-RELATED ACCIDENTS FOR OWN PERSONNEL (WITH AND WITHOUT MEDICAL LEAVE)

	2019	2020	2021	2022
Commuting accidents	11	12	15	2
Work-related accidents	2	5	4	0

Prevention and healthy lifestyles

To evaluate the possible impact of occupational risks on the health of workers, annual medical check-ups are offered, adapted to the specific risks of each employee. Moreover, this information is used to conduct an annual analysis on a global scale to assess health in the workplace of ACCIONA Energía as a whole.

The company also carries out campaigns for the prevention and early detection of diseases, in addition to monitoring workers who travel internationally, providing them with medical information on the destination area and immunisation if necessary. The company also enters into agreements with private health companies, offering appropriate services and conditions.

In 2022, as in previous years, no cases of professional diseases have been reported.

ACCIONA Energía has a Health and Wellness Programme to promote comprehensive employee care. It is a three-part programme focussed on a healthy diet, physical activity and emotional management. The initiatives developed as part of the Health and Wellness Plan include:

- Medical video-consultation 7 days a week in Spain for employees and health advice in face-to-face consultation.
- Identification, monitoring, awareness-raising and training on stress at the work station.
- Publications on general health topics, pregnancy and breastfeeding, ergonomics and the COVID pandemic.

### Stress in the workplace

ACCIONA Energía believes that mental health care is essential in creating an atmosphere of harmony and wellbeing for all the company's employees. To this end, ACCIONA Energía carries out assessments to identify possible risks related to work-related stress, and implements measures and initiatives to combat it. The company's Occupational Health service is staffed by experts trained in aspects of working life that are directly related to the organisation or content of the work carried out. The service is open to all employees without exception.

Through programmes and workshops on work and emotional wellbeing, and initiatives like the launch of the "360° Emotions Training", ACCIONA Energía aims to extend greater awareness of work-related stress to as many employees as possible.

### Training and awareness-raising

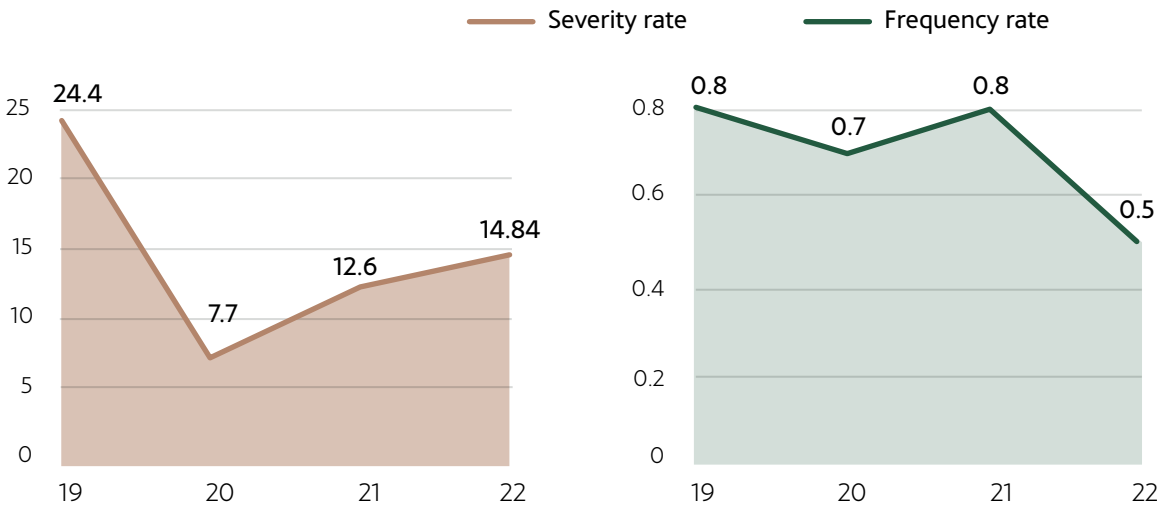
ACCIONA Energía has internal communication mechanisms that are key to preventing accidents and preserving the health and safety of employees. Among the most widely used tools are the intranet, newsletters, e-mail, suggestion box, communications via posters or payroll, as well as specific actions in the workplace. Along these lines there have been a total of 36,268 training actions on occupational health and safety in 2022.

### Extending the commitment to prevention to the supply chain

One of ACCIONA Energía's main goals is to extend its culture and commitment to health and safety to the entire supply chain. At the time of contracting, all suppliers must undergo an assessment of their performance in this area. The company's contract is thus contingent upon effective implementation. ACCIONA Energía has measures in place for supervising prevention management from its supply chain, which covers all phases of the process, from tendering to completion:

- Corporate bidders must answer a questionnaire to show proper safety and health management. Only the companies that show the minimum level required pass the first screening.
- The score in Health and Safety influences the final selection of the supplier.
- Planning of the works to agree on the safety measures is materialised in several obligatory meetings before the commencement of the works.
- All activities carried out by contractors are monitored and controlled.
- The management boards of each project or activity integrate to the same extent the performance of safety and health of employed and subcontracted personnel.
- During and after the provision of the service contracted an assessment is made of the health and safety performance to identify lessons learnt and to condition future tenders for suppliers.
- In addition, the company periodically organises meeting points with suppliers to share experiences and agree on health and safety actions to be taken.

### → EVOLUTION OF ACCIDENT INDICATORS FOR CONTRACTORS



\* Severity rate: (no. of working days lost due to work accident/hours worked) x 200,000.

\*\* Frequency rate: (no. of accidents with work loss/hours worked) x 200,000.

Leadership

ACCIONA Energía promotes leadership models to encourage technical excellence and a sense of shared purpose, with a view to ensuring that the entire organisation is aligned to meet the challenges and opportunities of sustainable development.

MANAGING KNOWLEDGE

ACCIONA Energía’s people management model is based on the definition of roles as basic organisational units in which jobs that share a mission, responsibilities, knowledge and skills are grouped together. This model makes it possible to pinpoint the skills needed to achieve objectives and fulfil business strategies. The framework facilitates a standardised application of human resources policies, both in terms of recruitment and compensation, training and development.



TECHNICAL LEADERS PROGRAMME AND NETWORK OF EXPERTS

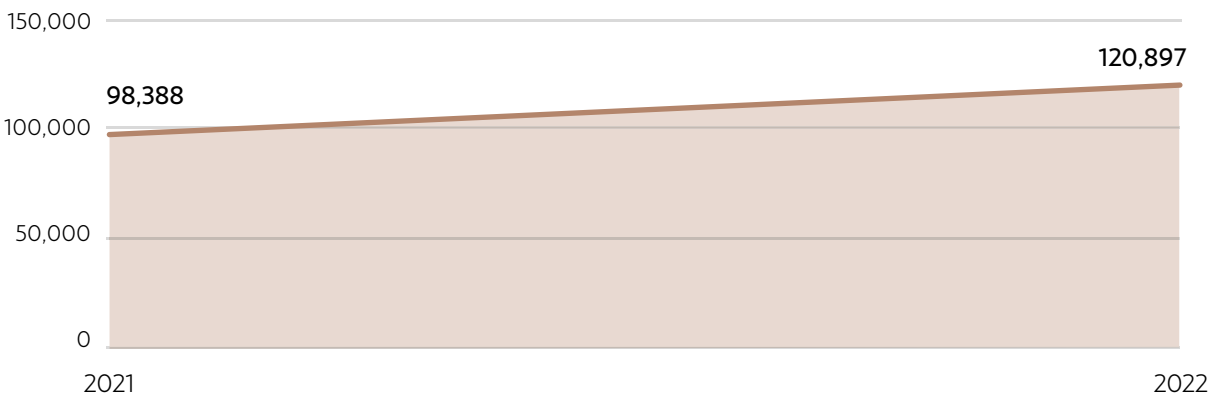
ACCIONA Energía has a Technical Leaders group comprising people who provide exceptional technical knowledge in key business areas. These professionals are able to transform this knowledge into a high-value technical skill, and they are recognised by the company, they have a general profile, and have published their own work in specialised media, or teach in different forums.

With 19 Technical Leaders, the main function of the programme is to ensure the transfer of knowledge and the application of more appropriate, efficient and innovative solutions for the projects carried out.

ACCIONA UNIVERSITY

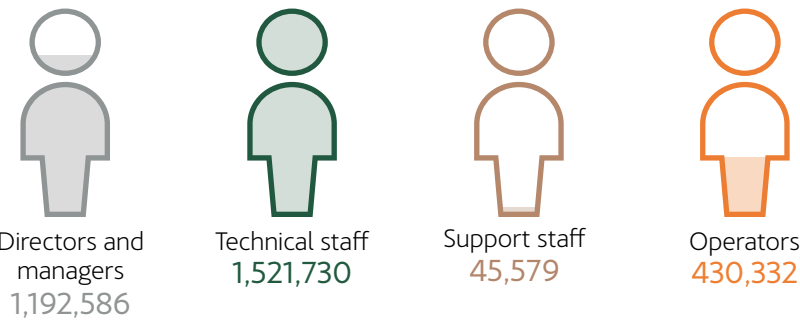
ACCIONA’s Corporate University has the mission of ensuring training and ongoing development of the global workforce, always depending on the needs of the business which also has a process for assessing the effectiveness of the training given.

→ EVOLUTION OF THE TRAINING RECEIVED BY ACCIONA ENERGÍA EMPLOYEES  
Hours

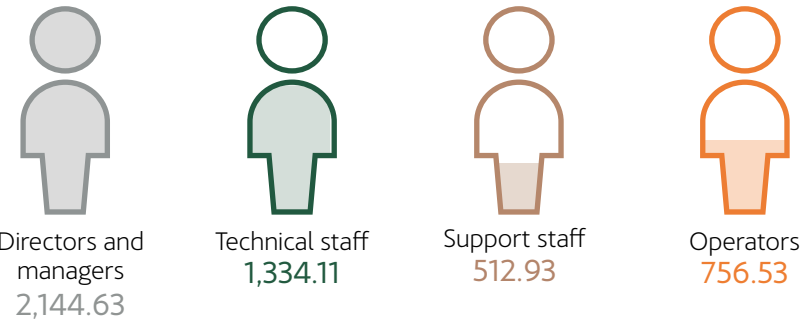


→ INVESTMENT IN TRAINING IN ACCIONA ENERGÍA

Total investment (euros)

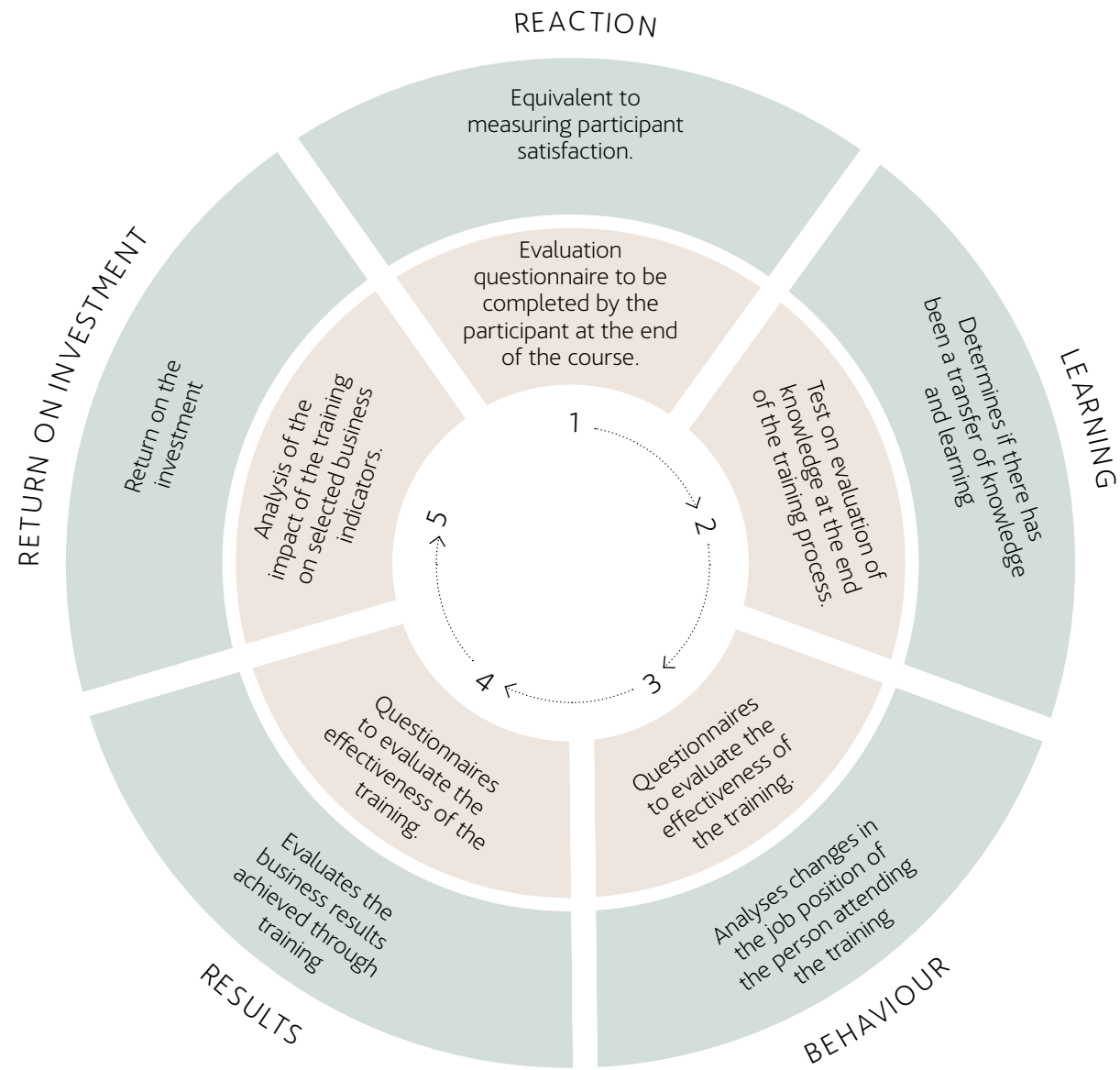


Investment per employee/year (euros)





→ EVALUATION LEVELS



Note: in 2022, evaluations were carried out at levels 1, 2 and 3.

The company’s training programmes are continuously reviewed and adapted to the new needs of the company and its professionals. In 2022 the need for new content in the different schools was analysed.

Business School

The business school programmes have been converted to online and hybrid format throughout the ACCIONA Group:

- **Executive MBA:** programme jointly designed by the School for Industrial Organisation (EOI) and ACCIONA to provide our managers with cross-cutting business tools. 32 ACCIONA professionals from different countries around the world attended this training initiative.
- **iGEP, International Global Executive Programme:** with the aim of sharing knowledge with internal and external experts and reflecting the influence in our business and leadership, 23 executives began the 2nd Edition of the programme created jointly between the *IE Business School - Financial Times* and ACCIONA.
- **iSEP, International Skills Enhancement Programme for Managers:** aimed at all ACCIONA managers from all countries and businesses, this is a continuity programme for the management team co-designed between the *IE Business School - Financial Times* and the academic committee of the ACCIONA University. In 2022 over 400 managers have participated, covering topics dealing with digital transformation, the macroeconomic environment, project management, Metaverso and *reskilling* as a lever for innovation.

Technical Skills

These training spaces were designed to improve productivity, technical excellence and the specialisation and internationalisation of ACCIONA Energía professionals, guaranteeing a high level of qualification. Each itinerary contains specialties and sub-specialties. The training activities are proposed as a structured educational sequence.

- **IMPA, International Master in Project Administration:** in 2022, one student completed this comprehensive Master’s Degree offered in collaboration with the Polytechnic University of Madrid. The syllabus focuses on training the project directors in a post-graduate course that consolidates their leadership role and provides tools to develop project management skills.

Workday Learning and Digital Libraries

Digital training to train non-managerial profiles in soft skills and technical competence. The aim of these initiatives is to supply all employees with the necessary tools to meet the demands of their current job and also promote their professional development.

Access to rights

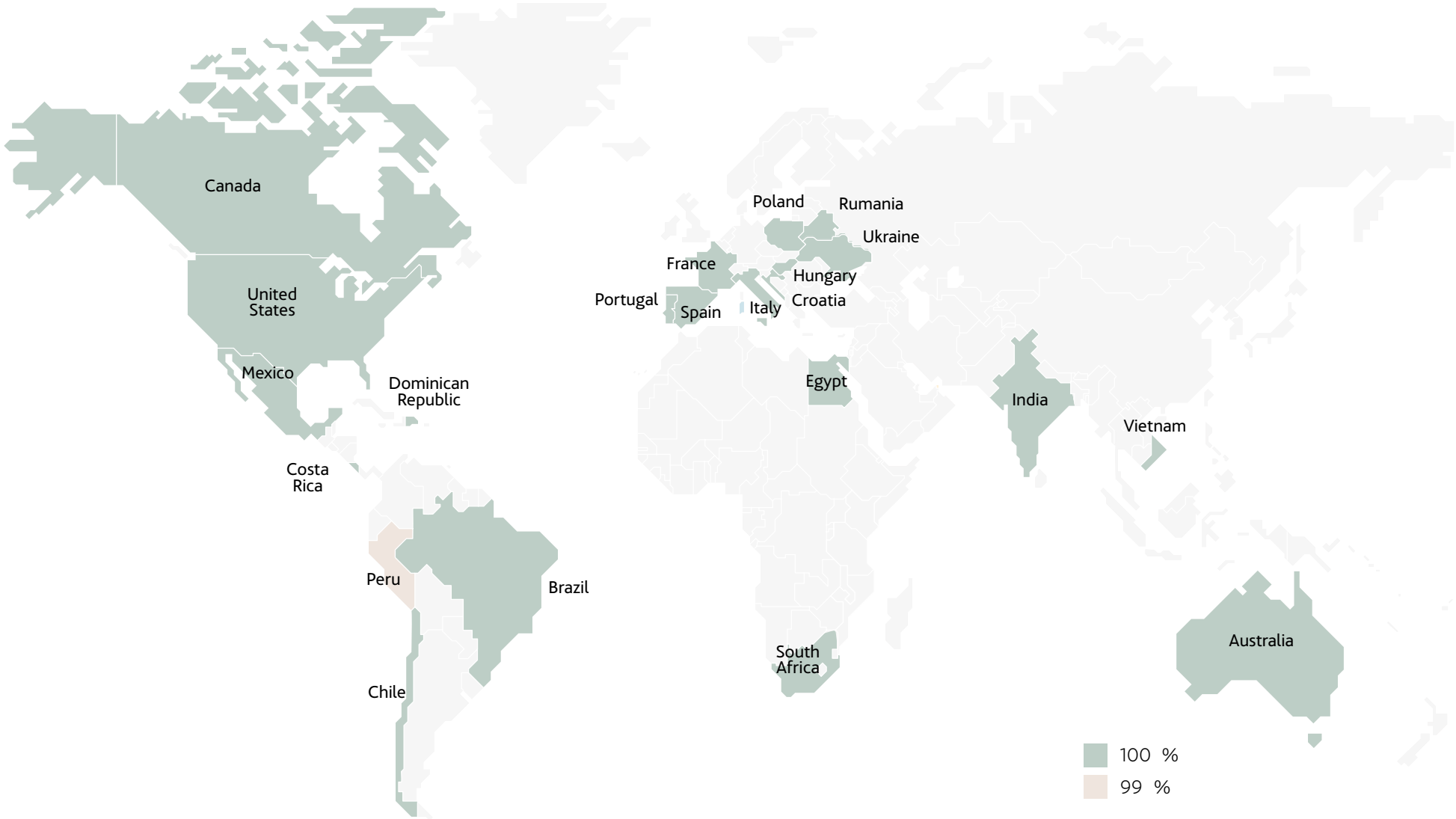
COVER FOR WORKERS

At ACCIONA Energía, practically all groups of employees are covered by collective bargaining agreements in the different countries for the protection of their rights.

With regard to the company's policies and commitments on social dialogue, in all countries where ACCIONA Energía is present, there are open lines of dialogue between workers' representatives and those responsible for human resources and/or labour relations in each company and country. In addition, each country and company has formally established channels for submitting complaints and claims, as well as communication channels with employees, human resources departments in each business unit, and workers' legal representatives. All without prejudice to the direct communication that each employee can establish with their corresponding human resources representative.

Collective agreements and/or conditions are signed at all construction sites and projects, except in those countries where union membership or representation is not a standard practice or is considered illegal. In such situations, mechanisms have been established to control the conditions agreed, applied both to the company and to its suppliers. ACCIONA Energía holds ongoing and regular meetings with all trade union and employee associations to prevent any issues that could lead to conflict, thereby minimising the incidence of such scenarios.

→ EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS BY COUNTRY (%)



RESPECT FOR HUMAN RIGHTS

→ HUMAN RIGHTS

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>Reduction of asset value</li><li>Increase in operating cost</li></ul>	<ul style="list-style-type: none"><li>Increase in asset value</li><li>Higher revenue</li><li>Greater regulatory burden</li></ul>

The Principles of Action and Ethical Conduct in the Code of Conduct establish the respect for human rights internationally acknowledged at ACCIONA Energía and that all people who form part of the company perform their professional activities respecting human rights and public liberties.

Human Rights Policy

The Human Rights Policy, approved by the Board of Directors and included in the Book of Policies of ACCIONA Energía, reflects the commitments and principles of responsible business conduct applicable to all company activities.

ACCIONA Energía supports, respects, and contributes to the protection of internationally recognised fundamental human rights, making sure not to be complicit in any form of abuse or violation of those rights with regard to workers, suppliers, contractors, associates, partners, competitors, customers, local communities, and society in general.

Therefore, it pledges to defend and monitor those rights in all the activities and in the geographic areas where it works and to moreover promote the adoption of these principles and values at the companies in which it may have equity holdings, even without a controlling interest, and also among its suppliers, contractors and collaborators.

ACCIONA Energía respects and contributes to the protection of human rights pursuant to the United Nations International Human Rights Charter, the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work and its eight fundamental conventions; the Workers’ Representatives Convention; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; the Convention on the Rights of the Child; the a Global Compact; the Seoul Declaration on Safety and Health at Work; and the Guiding Principles on Enterprises and Human Rights.

PRINCIPLES OF RESPONSIBLE BUSINESS CONDUCT OF THE COMPANY

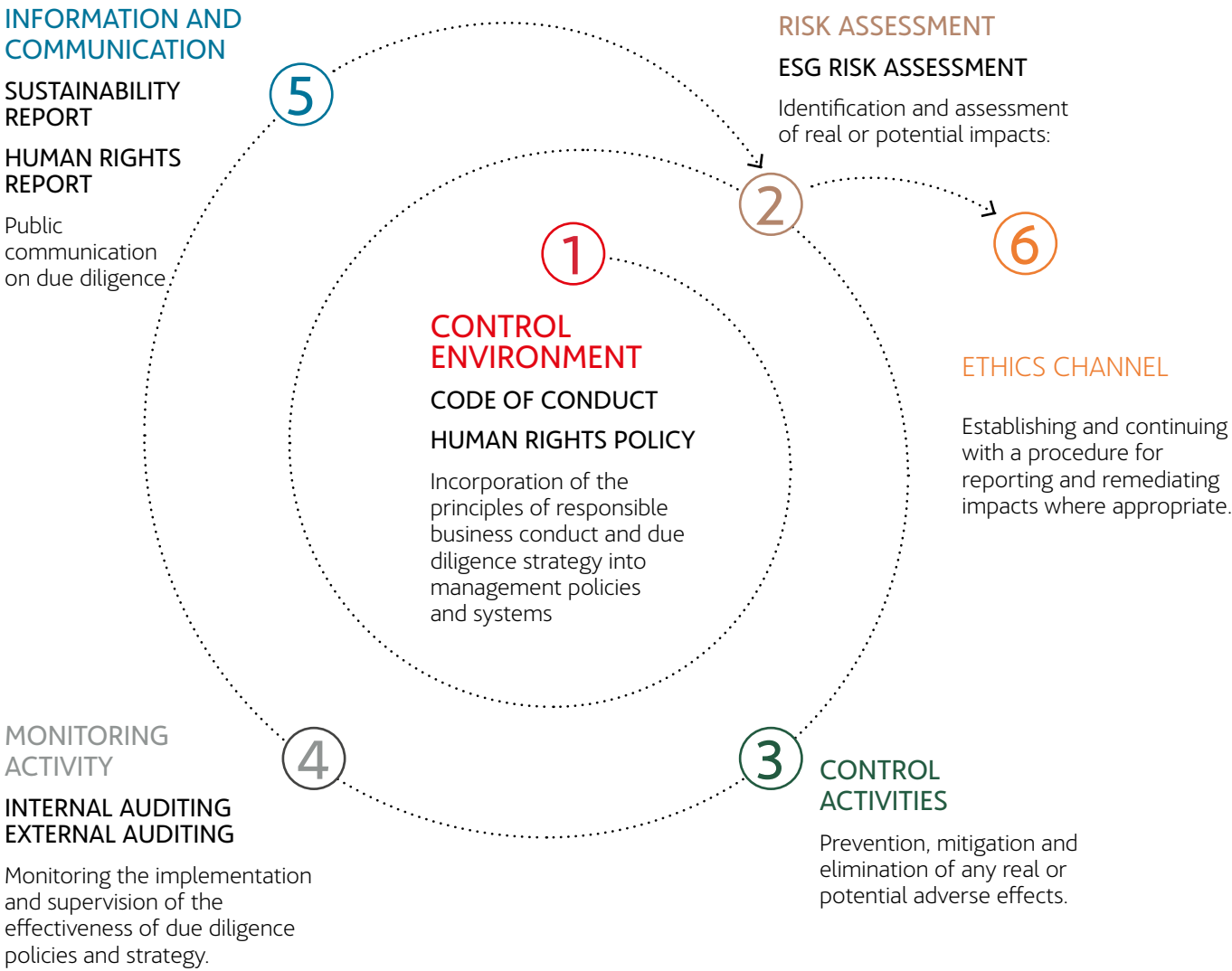
- Fair, dignified and respectful treatment of people.
- Free work.
- Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence.
- Safe and healthy working conditions.
- Ethical, fair and equitable working and recruiting conditions.
- People’s rights.
- Privacy and communications.
- Respect for the communities in which it operates.
- Development of skills.
- Sustainable contribution.



Due Diligence Strategy

ACCIONA Energía undertakes to identify, evaluate, prevent, mitigate, stop, monitor, communicate, account for, address, remedy and report back on real or potential adverse impacts of its business activities and relationships on human rights through a due diligence process. The Human Rights Policy describes the company’s due diligence strategy for responsible business conduct.

INTERNAL CONTROL SYSTEM OF SOCIAL SAFEGUARDS (ICSSS)



Based on the principles and good practices of the reports published by the Committee of Sponsoring Organisations of the Treadway Commission (COSO) I: Internal control

Since 2021, ACCIONA Energía has an integrated procedure and system for risk assessment and management of social safeguards compliance, backed up by a social safeguards audit mechanism.

ACCIONA Energía has adopted and implemented an internal control system to prevent and mitigate real or potential human rights impacts. The Internal Control System for Social Safeguards (ICSSS) promotes and consolidates a true culture of compliance and respect of current legislation and reference international rules and principles on human rights.



Identification and assessment of risks of real or potential impacts:

Detection of real or potential adverse effects on human rights is carried out on an annual basis, in accordance with the analysis of non-financial risks.

The company maintains regular and fluid dialogue with its stakeholders during this process. The risk assessment methodology combines an analysis of homogeneous risk variables and indicators with a consultation process with those responsible for the facilities with the greatest potential risk.

Social risk analysis includes the assessment of five social variables covering 20 indicators related to human rights: workplace discrimination, freedom of opinion and expression, arbitrary arrest and detention, forced labour, modern slavery, human trafficking, child labour, under-age workers, freedom of association and collective bargaining, occupational health and safety, decent wages, fair working hours, informal workforce, right to privacy, minority rights, sexual minorities, women’s and girls’ rights, indigenous peoples’ rights, land, property and housing rights, security forces and human rights.

ACCIONA Energía has identified five key issues requiring priority action, in accordance with its commitment to the principles of responsible business conduct and the company’s ESG risk analysis process:

 HIGHLIGHTED MATTERS	 PRINCIPLES OF THE HUMAN RIGHTS POLICY	 RISK VARIABLES
Discrimination in the work place	Fair, dignified and respectful treatment of people.	Disability in the workplace.
Fundamental rights and principles	Free work Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence People's rights Respect for communities and land rights	<b>Workers' fundamental rights and principles</b> Forced labour. Modern slavery. Child labour. Freedom of opinion and expression Arbitrary arrest and detention. Human trafficking. Young workers. Freedom of association and collective bargaining. Security forces and human rights.  <b>Minority fundamental rights and principles</b> Minority rights. Sexual minorities. Women's and children's rights.  <b>Fundamental rights and principles of communities</b> Rights of indigenous peoples. Rights to land, property and housing.
Health and safety conditions	Safe and healthy working conditions.	Occupational health and safety.
Working and recruitment conditions	Ethical, fair and equitable working and recruiting conditions.	Decent wages. Decent working hours. Informal workforce.
Right to privacy	Privacy and communications.	Right to privacy.

Having conducted on-site risk analyses and the relevant consultation process, the distribution of the company's human rights risks is as follows:

→ REPRESENTATIVENESS OF THE SOCIAL RISKS OF ESG ASSESSMENT (%)



Inclusion of the results of the impact assessments in internal processes

The Internal Control System of Social Safeguards (ICSSS) is implemented at all levels and is composed of 80 control activities. Control activities are actions that derive from policies, standards and procedures in defence of the principles that establish the true meaning of responsible business conduct. Internal controls have been linked to each identified risk event to prevent and mitigate the likelihood of a risk occurring.

The ICSSS documents these internal controls, with a series of attributes characterising them, amongst others the specific description of the control activity, the area or management unit responsible for performing them and the evidence that demonstrates the control is being performed properly.



Internal audit

Monitoring of the functioning of the ICSSS is carried out by the Audit and Sustainability Committee, as the body delegated by the Board of Directors, which entrusts the Internal Audit Unit with the monitoring of the functioning and effectiveness of the controls established to prevent and mitigate human resources related risks as part of the company's internal control systems.

Every year the Internal Audit Unit supervises the functioning and effectiveness of the controls established by the Internal Control System of Social Safeguards. Supervision of the system is carried out through the ACCIONA-RMS Risk Management application, whereby control managers confirm the validity, design and effectiveness of the internal controls under their responsibility and verify their correct operation. Any non-compliance, partial compliance or requirements to adapt the control to operating realities must be reported. Furthermore, the designated manager must also provide supporting evidence of compliance for a representative sample of controls.

Once the ICSSS internal monitoring procedures have been completed, reports are prepared reflecting the results, improvement recommendations and action plans proposed. The Internal Auditing Unit reports to the Audit and Sustainability Committee of on the scope and outcome of the supervision made carried out on the SCISS.

The updating of risks and controls is carried out annually by the Sustainability Department after the annual monitoring process performed by the Internal Audit Unit.

In 2022 it was concluded that the Internal Control System of Social Safeguards is correctly established in the company.

Follow-up of the efficacy of measures and continuous improvement

Every year ACCIONA Energía reviews its internal processes for preventing and avoiding adverse consequences on the human rights of its stakeholders. According to the reports issued by the Internal Auditing Unit, the due diligence measures are improved.

Mechanisms for reporting and claims

The Ethics Channel is the existing instrument for communicating any doubts or queries on human rights issues and reporting any irregularity. The channel is open to all ACCIONA Energía employees, suppliers, customers and partners.

If necessary, the company forwards the matter of abuse of human rights to the Ethics Channel and to the appropriate judicial authority, with which it collaborates to the necessary extent.

Remediation

ACCIONA Energía designs legitimate and effective mechanisms for remediating any adverse impacts that the company's activities could cause or contribute to.



Report

In accordance with due diligence criteria, ACCIONA Energía publicly and transparently communicates any serious violations that may have occurred, as well as the actions implemented to address any adverse consequences resulting from the activities of the company and its subsidiaries or any of its business relations. The relevant information is reported via the Statement of Non-Financial Information (SNFI) / Sustainability Report.

Promotion and training

In 2022, as part of the commitment to managing knowledge on human rights, on the one hand, a specific human rights training course was relaunched, run in collaboration with the Spanish Global Compact Network, and available to the entire workforce and the company’s suppliers. Over 150 hours of training were provided on the subject, in which 70 of the company’s employees took part.

On the other hand, training sessions on “Human Rights and Business”, with both theoretical and practical components, were held for specific areas of the company. These sessions were delivered by the specialist organisation GENTIUM, and consisted of 16 hours of training sessions in which over 40 company employees took part.

Human rights in the communities

Using its Social Impact Management (SIM) methodology, ACCIONA Energía analyses and manages the real or potential effects on human rights that may arise among local communities and other stakeholders in connection with a particular project or service.

The Company analyses the characteristics of the communities in which it operates including an assessment of human rights conditions and other social issues, and an evaluation of those impacts. If any potential significant human rights impacts are identified, Social Impact Management methodology requires the implementation of prevention and mitigation activities. Should any such risks arise, the company undertakes to develop or cooperate in the design of remediation mechanisms. SIM methodology has been implemented in 114 projects in 13 countries.

The SIM methodology makes it possible to know and manage the concerns and expectations generated by ACCIONA Energía from its activity, through communication and dialogue with the communities. The company has different activities and communication channels through which the stakeholders affected by a project can send their queries, complaints or recommendations.

In 2022, ACCIONA Energía worked on updating its Social Impact Management methodology to align the management of the social impact of projects and services with the Social Safeguards Internal Control System. A specific budget is allocated for the exhaustive analysis and assessment of real or potential impacts on human rights conducted in the initial phases of a project. The implementation phase monitors the conditions of workers, the supply chain, communities and other stakeholders. Control activities must be implemented to prevent and mitigate any possible impacts detected.

Security and Human Rights

ACCIONA Energía undertakes to respect the Voluntary Principles on Security and Human Rights and to act with due diligence in both categories.

ACCIONA Energía’s non-financial risk analysis includes a risk variable relating to security and human rights, which is designed to detect real or potential adverse impacts on human rights. Relevant risk control and mitigation mechanisms are established on the basis of the results of the risk analysis.

The Social Safeguards Internal Control System includes four control activities specifically designed to ensure respect for human rights relating to security personnel. Control activities include supervision of the alignment of the company’s security plans with the Voluntary Principles on Security and Human Rights, and the provision of human rights training for security personnel.

Human rights in the supply chain

The Ethical Principles for Suppliers, Associates and Contractors establish principles of responsible business conduct aligned with the commitments acquired by ACCIONA Energía in its Human Rights Policy.

PRINCIPLES OF RESPONSIBLE BUSINESS  
CONDUCT IN THE SUPPLY CHAIN

- Respect for human rights as defined in the internationally recognised standards.
- Non-discrimination.
- Prohibition of Forced Labour.
- Prohibition of Child Labour.
- Respect for freedom of association, unionisation and collective bargaining.
- Fair labour practices.
- Adequate labour conditions.
- Compliance with working hours.
- Promotion of diversity and inclusion.
- Respect for the communities in which it operates.
- Respect for the conditions of migrant workers.

ACCIONA Energía ensures responsible management of its supply chain, including human rights due diligence, through the following actions:

Identification and assessment of risks of real  
or potential impacts

The Risk Map is the main tool for risk control and management in the supply chain. Through this mechanism, the group informs the whole supply chain of its criteria and policies on the subject of corporate responsibility and sustainability. This risk analysis is carried out prior to entering into contracts. Required control activities are defined on the basis of the criticality of the supplier.

The Map is made up of 11 variables, which include the “country risk” variable, consisting of several indices taken from Maplecroft and linked to various factors related to human rights: workplace discrimination, forced labour, modern slavery, human trafficking, child labour, freedom of association and collective bargaining, occupational health and safety, fair wages, decent working hours, minority rights, and migrant workers.

THE ETHICAL PRINCIPLES  
OF SUPPLIERS,  
COLLABORATORS AND  
CONTRACTORS ESTABLISH  
THE PRINCIPLES OF  
RESPONSIBLE BUSINESS  
CONDUCT ALIGNED WITH  
THE COMMITMENTS MADE  
BY ACCIONAENERGÍA IN THE  
HUMAN RIGHTS POLICY.

Supply chain controls

Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as the risks of any kind increase, whether economic, country, activity and sustainability, as set out in the supplier Risk Map. The levels are:

- 1. The supplier must acknowledge acceptance of the terms of the Self-Declaration document, which includes a commitment to the United Nations Global Compact, the ACCIONA Energía Ethical Principles for Suppliers and Contractors, ACCIONA Energía’s Policies and personal data protection, amongst others.
- 2. To participate in tenders, associates must fill in the self-assessment questionnaire in PROCUR-e, GoSupply or Repro. This questionnaire allows ACCIONA Energía to calculate the variables or scores in different fields.
- 3. Strategic suppliers (awarded contracts totalling over €400,000 in the previous 12 months) require an additional approval control process, which verifies compliance with international standards on human rights, supplier integrity, financial solvency and up-to-date payments to government agencies.
- 4. The highest level is required from strategic suppliers in risk countries for which audits are carried out following ACCIONA Energía’s Audit Protocol.
- 5. Audits have also been established for tier 2 suppliers of large components with contracts exceeding €5 million. These are asked to provide a list of suppliers that account for 80-90% of the total expenditure of the supply contract with ACCIONA Energía, which are then audited.

The company also has a No-Go policy, which applies to all of the above levels, regardless of criticality. Failure to comply with the criteria set out in this policy results in a supplier not being allowed to work for ACCIONA Energía.

The Social Safeguards Internal Control System includes seven control activities specifically designed to ensure that the due diligence actions described above are carried out in accordance with the company’s rules, procedures and policies. Supply Chain Management is responsible for implementing them and providing evidence of their proper execution.

Elimination of real adverse risks

ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits through action plans. In the event that the non-conformities cannot be resolved within the time periods established, the company is marked as *No-Go*.

Failure to comply with the minimum standards established in the No-Go Policies means that a supplier cannot be contracted until they resolve the underlying cause that led to their No-Go status. ACCIONA Energía has met its 2022 target of 0% of general purchase orders to companies with this status.

The No-Go Policies include the following situations:

- 1. Suppliers with significant ethical and integrity risk, either because they are on international sanction lists or because they exhibit serious signs of corruption, fraud or money laundering.
- 2. Strategic suppliers in at-risk countries that have not been audited, or that have been audited and have one or more unresolved Serious Non-Conformities.
- 3. Demonstrated non-compliance with the United Nations Global Compact.
- 4. Risk of economic solvency (from €1 M of contracting).
- 5. Debts with the Social Security Institute or Tax Authorities.
- 6. Companies penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

32 suppliers were classified No-Go in 2022, of which 13 were removed from the category following auditing, action or improvement plans, or Enhanced Due Diligence. The latter consists of an investigation into any adverse impacts detected, communication with the supplier to confirm the information, and verification of the resolution of the conflict prior to entering into any new contract.

NON-CONFORMITIES IN 2022

132 suppliers were audited in 2022.

Focussing on the Non-Conformities, the following is worth noting:

- 62% had 0 SNCs.
- The remaining 38% signed up for the various action plans. Of this percentage, 23% have totally resolved their SNCs and the rest have not yet reached the deadline.

Only two suppliers were moved to No-Go status.

With regard to tier 1 and tier 2 suppliers from at-risk countries, 23 suppliers from China, Hong Kong, India and Vietnam were audited:

- 70% of the audited suppliers had no Serious Non-Conformities. All the identified SNCs belonged to tier 2.
- None of the identified Serious Non-Conformities were related to human rights. All of the cases identified were related to environment and occupational risk prevention.

ACCIONA Energía is aware that insisting on the resolution of the Non-Conformities detected during audits is the correct path to help its suppliers to improve as companies, mitigate the risks associated with the supply chain and generate shared value.

Follow-up of the efficacy of measures and continuous improvement

ACCIONA Energía has identified a need to enhance ESG Risk and Opportunity Management and adapt processes and systems to reflect recent regulatory developments in the supply chain. The 2022 process review resulted in the implementation of updated supplier approval and assessment methodology and additions to audit protocols and No-Go policies designed to broaden focus on ESG issues.

Mechanisms for reporting and claims

ACCIONA Energía’s provides suppliers with bidirectional channels to inform of any issue relating to their commercial relationship: <Provedores.Energía@ACCIONA.es> and <Suppliers.Energy@ACCIONA.com>.

Similarly, the Ethics Channel is the instrument that has been made available to suppliers to communicate any doubts they may have, submit queries and report any irregularities related to human rights, amongst others. If necessary, the company forwards the matter of abuse of human rights to the appropriate judicial authority, with which it collaborates to the necessary extent.

Remediation

ACCIONA Energía designs legitimate and effective mechanisms for remediating any adverse impacts that the company’s activities could cause or contribute to.

Reporting

ACCIONA Energía provides transparent information on its due diligence processes, discloses any serious violations that may have occurred, and reports actions carried out to address any negative effects resulting from its business relationship activities. The communication is made through the Sustainability Report.




05

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CIRCULAR ECONOMY	79
BIODIVERSITY	83
INTEGRATED ENVIRONMENTAL MANAGEMENT	89

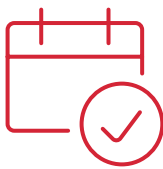
PLANET  
POSITIVE

# INVEST TO REGENERATE THE PLANET

ACCIONA Energía’s projects look for a positive impact on the planet through business models, based on decarbonisation, conservation of ecosystems and the circular use of resources.

	01 CLIMATE	02 BIODIVERSITY	03 CIRCULARITY	04 WATER
RESPONSIBLE 	DECARBONISATION	MITIGATION	ZERO WASTE APPROACH AND RENEWABLE RESOURCES	REDUCTION IN USE
RESILIENT 	ZERO EMISSIONS SOLUTIONS. MITIGATION	DIGITIZATION 100% MAPPING AND EVALUATION	MULTIPLY CIRCULAR NATURE OF PROCESSES	EFFICIENT MODELS ACCESS AND SANITATION
REGENERATIVE 	CLIMATE POSITIVE	POSITIVE NET IMPACT	NEW BUSINESS MODELS	INCREASE IN PEOPLE BENEFITTING
	Extend recognition as main players in the transition towards a decarbonised economy.	Generate a net positive natural capital.	Ability to develop zero-waste projects.	Significantly increase the provision of quality water and its sustainable use with high-technology.

## KEYS MILESTONES 2022



Reduce GHG emissions by 80% (Scopes 1 and 2) compared to 2017, in line with the 2030 SBT target of a 1.5°C reduction. The emissions generated were offset to achieve neutrality.

More than 99 % of eligible CapEx is aligned with the European taxonomy of low-carbon activities.

Voluntary planting of a total of 198,081 trees (2021-2022).

98% of waste generation reused and 13% consumption of resources from renewable or recycled sources.

First pilot phase implemented for quantifying nature-related risks- TNFD.

Consumption of surface water, groundwater and municipal water in water-stressed areas decreased by 45% compared to 2020.

Reduce GHG emissions in line with the SBT target 2030 of 1.5°C reduction and offset GHG emissions in its direct operations.

Invest at least 95% of the CapEx in sustainable activities according to the European taxonomy.

Voluntary planting of 117,500 trees.

Maintain the recovery of total waste at more than 95%.

Increase the percentage of renewable-source resources in line with the 2025 target to double the consumption of recycled materials.

Maintain the reduction in consumption of surface water, groundwater and municipal water in water-stressed areas above 12% compared to 2020.

## MAIN CHALLENGES 2023





Climate

→ MITIGATION OF CLIMATE CHANGE

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Critical	<ul style="list-style-type: none"><li>Greater regulatory burden</li><li>Reduction of asset value</li></ul>	<ul style="list-style-type: none"><li>Increased revenue</li><li>Increase in asset value</li></ul>

→ ADAPTATION TO CLIMATE CHANGE

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Significant	<ul style="list-style-type: none"><li>Reduction of asset value</li><li>Increase in operating cost</li></ul>	<ul style="list-style-type: none"><li>Increased revenue</li><li>Increase in asset value</li></ul>

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies.

The company presents a unique company profile, integrated in all the phases of the value chain: development, financing, engineering and construction, supply chain, O&M and the marketing of energy. This places the company in a unique position to lead the energy transition process to a decarbonised and electrified economy, based on renewable energy sources.

The same as for the ACCIONA group, ACCIONA Energía fully shares the objectives of total decarbonisation of the economy through public commitments, policies, specific procedures and objectives, and an economic incentive model linked to achieving GHG emission reductions for executives, managers, technical and support staff.



GREENEST ELECTRICITY COMPANY IN THE WORLD FOR THE EIGHTH CONSECUTIVE YEAR

ACCIONA Energía has once again confirmed its position as the world’s greenest electricity generation company, which it occupies in the New Energy Top 100 Green Utilities ranking since 2015. This ranking is drawn up annually by Energy Intelligence, an independent consultancy firm specialised in energy markets.

The ranking selects over one hundred of the largest electricity companies in the world and classifies them according to their CO2 emissions and their installed capacity in renewable technologies, to determine their degree of involvement in the transition to a low-carbon electricity system.

ACCIONA Energía’s climate change strategy is approved and supervised by the Board of Directors through the Audit and Sustainability Committee. The review reflects ACCIONA Energy’s overriding priority to remain at the forefront of the transition to low-carbon business models.

ACCIONA Energía’s climate agenda is embodied in the objectives established in the five-year Sustainability Master Plan (SMP), which includes a series of initiatives and commitments that are managed by the Economic-Financial and Sustainability Department, and which are reported directly to the Audit and Sustainability Committee.



The key climate change goals and principles set out in the 2025 SMP are the following:

Fulfilling the path for reducing the emissions generated, both company and supply chain emissions for the 2017-2030 period, in line with Science-Based Targets Initiative (SBTi) goals to limit global temperature rise to 1.5°C and net-zero CO2 emissions by 2040 (Scopes 1 and 2; 2050 Scope 3).

Align the investment strategy to activities of mitigation and adaptation to climate change so that 95% of the CAPEX is classified within the European taxonomy in relation to these two environmental targets.

The company's [Climate Change Policy](#) considers it a priority to lead the transition towards low-carbon business models which reduce or mitigate the adverse effects of climate change. In addition to promoting the adoption of ambitious global targets for emission reductions and project development, developing products and services that contribute to the reduction of GHG emissions, and facilitating access to renewable energy.

Some noteworthy principles of this policy are:

- Boosting savings in energy consumption and energy efficiency improvements in its efforts in research, development and innovation, in its products and services, and in its supply chain, with the aim of reducing greenhouse gas emissions.
- Promotion of the decarbonisation of its business model through the purchase of renewable energy; the optimisation and reduction of energy use; and the offsetting of its emissions.
- Managing risks and opportunities associated with climate change in the short, medium and long term in order to take the necessary steps to ensure that its businesses can adapt to the expected physical and transitional changes.

IMPACTS, RISKS, AND OPPORTUNITIES RELATED TO CLIMATE

ACCIONA Energía promotes the adoption of ambitious global targets for the decarbonisation of the economy, providing for management of climate change risks and opportunities. Fulfilment of these targets is communicated in accordance with the European Commission's climate reporting guidelines and the recommendations of the Financial Stability Board, through its Task Force on Climate-Related Financial Disclosures (TCFD).

Management of risks and opportunities arising from climate change

Management of climate risks at ACCIONA Energía is carried out through the application of a specific corporate procedure, which identifies, evaluates, prioritises and communicates to the company’s decision-making bodies the risks associated with climate change that might affect the company and its centres.

This process results in the establishment of action policies and tolerance thresholds that reasonably guarantee the achievement of objectives within the various time frames established by the Sustainability Master Plan, and within 10 years in the case of observed mega-trends and previously established goals, such as the Science-Based Targets (SBTi).

Various tools are used to identify climate risks and opportunities, such as the company’s digital climate change model, which monitors historical and projected climate variables for all ACCIONA Energía centres for the various climate scenarios and time scales foreseen in the latest reports of the Intergovernmental Panel on Climate Change (IPCC).

This instrument oversees the variables for production, financial, emissions generation and energy consumption. It also includes references to the climate policies and the carbon markets in each region. Furthermore, tools that are not integrated into the digital model are also used to identify legal requirements.

The expertise of the members of the assessment group, appointed by the business units and the Sustainability Directorate, plays an essential role in the process of analysing and managing climate change risks. Using the tools mentioned above, the assessment group proposes a series of climate risk scenarios for all locations, group of locations and/or activities of the company or of its value chain, taking into account its geographical location, type of activity and vulnerability, which are classified and quantified on the basis of key indicators.

The climate scenarios most commonly used to identify risk situations are those provided by the latest IPCC reports and those generated within the framework of the Network of Central Banks and Supervisors for Greening the Financial System (NGFS). When assessing climate risks, ACCIONA Energía gives priority to the NGFS Current Policies scenarios for physical risks and the NGFS Delayed Transition or Divergent Net Zero scenarios for transitional risks.

ACCIONA ENERGÍA'S BUSINESS STRATEGY IS RESILIENT TO CLIMATE CHANGE, WITH A MODERATELY LOW IMPACT IN TERMS OF RISK AND A HIGH IMPACT IN TERMS OF OPPORTUNITIES

Climate risk situations with a higher probability of occurrence as well as economic-financial and/or reputational consequences are considered material and involve the preparation of specific treatment sheets that inform the company’s decision-making bodies of the current situation and the options for managing the risk (mitigation, adaptation, transfer or acceptance of the risk, and estimated cost).

Finally, identified and analysed climate risk situations are integrated into ACCIONA Energía’s general Risk Management System, where their tolerability is determined on the basis of the hierarchical structure presented in the section on governance.

Strategy: Climate Risks and Opportunities

ACCIONA Energía assesses the company’s most significant climate risks and opportunities on an annual basis. In 2022, climate risks were identified on the basis of their potential impact and time horizon, their geographical scope, and by business, and the actions implemented for their management.

On this basis, it can be affirmed that ACCIONA Energía’s business strategy is resilient to climate change, with a moderately low impact in terms of risk and a high impact in terms of opportunities.

→ CLIMATE RISKS

The 2022 climate risk assessment and management process resulted in the identification of 18 risk situations for the company. These are the most notable:

COUNTRIES	NGFS CLIMATE SCENARIO / TIME FRAME	CATEGORY	SUBCATEGORY	DESCRIPTION	LIKELIHOOD OF OCCURRENCE	FINANCIAL IMPACT	RISK MANAGEMENT
All countries where it operates	ACCIONA Energía's own scenario. Assessed for 2025.	Transitional Risk	Reputational. Policy and Legality.	Increase in the cost of capital, reduction in the availability of capital and/or increase in operational expenditure due to a worsening perception by the public in general (and investors in particular) of the organisation's performance with respect to its decarbonisation target, due to the company's failure to achieve its objective.	Unlikely	Minor. [1-2% of the financial outcome]	ACCIONA Energía allocates a specific budget for the implementation of projects to reduce company emissions. The company continuously monitors potential risk of deviation from its targets and implements measures to correct any such deviations. The vast majority of the company's electricity consumption comes from renewable sources. Mechanisms are in place to detect risks related to non-compliance with decarbonisation targets, starting from the project bidding phase. A cost item associated with the decarbonisation of the project is transferred to the budget of all projects in 90% of the highest emission range.
Spain	Current Policies Scenario. Assessed for 2030.	Physical risk	Chronic	Decrease in electricity production from Spanish hydropower plants due to reduced run-off and reduced optimisation of production due to seasonal variation.	Probable	Insignificant. [<1% of financial outcome]	The geographical diversification of ACCIONA Energía's energy activity mitigates the impact of this risk. Reservoir management with weather forecasting for improved planning and management. Implementation of tools to monitor and control potential changes in seasonality and production.
All countries where it operates	Current Policies Scenario Assessed for 2030.	Physical risk	Chronic	Decrease in revenues resulting from the reduction in the wind and photovoltaic resources required for electricity production, due to seasonal variations.	Unlikely	Insignificant. [<1% of financial outcome]	The geographical diversification of ACCIONA Energía's energy activity mitigates the impact of this risk.
All countries where it operates	Current Policies Scenario Assessed for 2030.	Physical risk	Chronic	Decrease in energy production due to damage to infrastructure as a result of an increase in extreme weather events.	Unlikely	Insignificant. [<1% of financial outcome]	Elevating the level of substations in active plants limiting the consequences of climate events such as flooding. Insurance coverage against risks arising from catastrophic weather events.

Climate	65	Water	77	Circular Economy	79	Biodiversity	83	Integrated Environmental Management	89
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→ KEY CLIMATE OPPORTUNITIES

The identified opportunities already form part of the company’s core business, focused on the development of activities that contribute to climate change mitigation and adaptation. These are the most notable.

COUNTRIES	NGFS SCENARIO	CATEGORY	DESCRIPTION	TYPE OF IMPACT	OPPORTUNITY MANAGEMENT
U.S.A., Mexico, Chile, Spain, Australia, etc.	Delayed Transition // Divergent Net Zero	Products and services	Increased demand for renewable generation technologies due to changes in climate change regulations.	Increase in sales (Very high)	Investment commitment of at least € 7,800M in installed capacity in renewable energies for the 2021-2025 period when ACCIONA Energía intends to operate more than 20 GW of renewable energy. The new installed MW will mean an increase in revenue. This strategy will carry on growing further than 2025, with a target of installed capacity >30 GW in 2030.
Spain, Mexico, France	Delayed Transition // Divergent Net Zero	Markets	Increase in the demand for energy services from industrial and municipal customers.	Increase in sales (Average)	Investment in innovation for energy solutions at customer sites. Expansion of the service to new locations and countries. In 2022, this opportunity led to a 327% increase in sales for this taxonomy-aligned business, compared to 2021.
Spain	Divergent Net Zero	Products and services	Demand from industrial and municipal customers for new electric car charging points.	Increase in sales (Average)	Gradual expansion of the representativeness of the ACCIONA Recarga business (formerly Cargacoches).

 <sup>7</sup> **More information:** [Report on the Risks and Opportunities related to Climate Change](#), in line with TCFD recommendations

CLIMATE TARGETS

Net Zero Target

ACCIONA Energía aligns its GHG emission reduction targets with those of ACCIONA, who has ambitious commitments for reducing emissions validated by the global Science Based Targets initiative (SBT) for 2030 with the goal of limiting the increase of global temperature to 1.5°C.

ACCIONA Energía’s path for the reduction of direct emissions (scope 1) and those resulting from energy consumption (scope 2 market-based) is set at 60% of the 2017 figures by 2030 in absolute terms. Meanwhile, the path for reduction established for scope 3 emissions<sup>8</sup> was set at 47% of the 2017 figures by 2030 in absolute terms. In accordance with GHG Protocol methodology, ACCIONA Energía does not use any offsetting to comply with its emission reduction targets.

<sup>8</sup> Categories “Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Transport and distribution upstream, Employee travel to work and Use of products sold by the organisation” representing more than two thirds of the company’s total Scope 3 emissions.



In 2022 the yearly target set for emission reduction was 23.07% for Scope 1 and Scope 2 emissions (market-based) and 18.08% of reduction for Scope 3 emissions.

ACCIONA, and by extension ACCIONA Energía, joined The Climate Pledge (TCP) in 2021 and strengthened its Net Zero commitment in 2022, establishing the goal of reaching Net Zero by 2040 in its Scope 1 and Scope 2 emissions (market-based) and by 2050 for its Scope 3 emissions.

The commitment of reaching the total decarbonisation of operations translates as a reduction of Scope 1, 2 and 3 emissions by 90% compared to 2017 and the absorption of the residual emissions generated through nature-based solutions.

Objectives for alignment with the European taxonomy for sustainable activities

ACCIONA Energía set itself the objective of bringing the investment strategy in line with the actions for mitigation and adaptation to climate change in such a way as to be able to classify 95% of the eligible CapEx as being aligned with the European<sup>9</sup> taxonomy.

PRINCIPAL TAXONOMY FIGURES

ACCIONA Energía’s sustainable activities are significantly aligned with European taxonomy requirements and are focussed particularly on mitigation and adaptation to climate change.

The proportion of eligible economic activities according to the taxonomy in 2022 was:

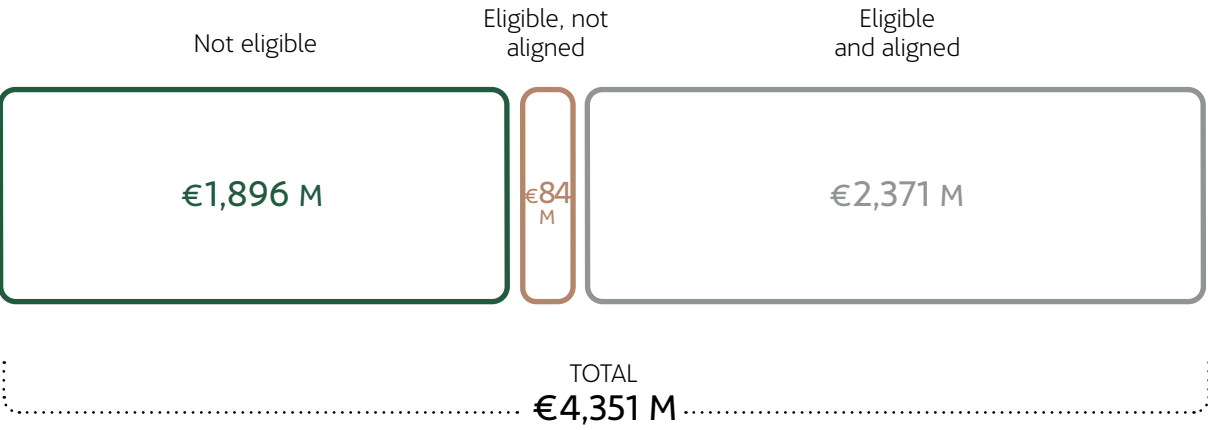
- Business Turnover: 56.42% eligible.
- OpEx: 86.85% eligible.
- CAPEX 98.34% eligible.

Conversely, the taxonomy-aligned percentage of the eligible figure for ACCIONA Energía activities in 2022 was as follows:

- Business Turnover: 96.58 % of alignment of the eligible figure.
- OpEx: 96.77 % of alignment of the eligible figure.
- CAPEX 99.85 % of alignment of the eligible figure.

The following graphs schematically show the results of eligibility and alignment of ACCIONA’s activities with the taxonomy. For the absolute figures of OpEx and CapEx below the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, for which reason they may differ from the figures presented under the same heading in the company’s financial statements.

TURNOVER ALIGNED WITH THE EUROPEAN TAXONOMY



OPEX ALIGNED WITH THE EUROPEAN TAXONOMY



<sup>9</sup>The methodology for the calculation and breakdown of data according to Annex II of Commission Delegated Regulation (EU) 2021/2178, of 6 July 2021, is contained in the Appendices section of this report.



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INTERNAL CARBON PRICE

The company subscribes to the petition of the Carbon Pricing Leadership Coalition (CPLC), an alliance between political leaders, companies, academics and the civil society, for establishing long-term carbon pricing policies.

The setting of an internal carbon price must, on the one hand, contribute to the company achieving the commitment to decarbonisation of the company and, on the other, acts as an incentive for the complete transformation of ACCIONA Energía’s production and consumption model toward a fully decarbonised scenario by 2040.

In 2022, ACCIONA updated its *Guide for application of the internal carbon price*, in which the following main actions will be established:

- From business to project: establishing a global emission reduction target for the whole company and for facilities that represent 90% of the company’s total emissions.
- Land prices: preparation of a mandatory carbon budget for all facilities forming part of the group mentioned above. This budget is calculated on the basis of an internal price established at €7.5/tCO<sub>2</sub>e, acting as a shadow price.

- Price to be paid based on fulfilment of objectives: payment of the emissions generated at a variable price ranging from €7.5€/tCO<sub>2</sub>e to €190/tCO<sub>2</sub>e, based on the fulfilment, or not, of the objectives set, as a contribution to the company’s decarbonisation fund.

Decarbonisation fund



Since 2016, the company has had a fund for which the budget arises from charging the internal price of carbon in its activities. This fund is used to acquire carbon credit to offset the emissions generated from its direct action, but since 2020 it has also been used to invest in projects to reduce its carbon footprint.

The financing of initiatives for decarbonisation through the fund is awarded by means of an internal bidding mechanism. In a first phase, a selection committee decides which proposals are a priority according to their impact and return until, finally, a committee comprising members of senior management determines the allocation of funds to the projects with the greatest potential.

In 2022, the initiatives started the year before continued their course, with an emission reducing potential of around 7,750 tCO<sub>2</sub>e.

The projects within the decarbonisation fund are:

- Project to reduce CH<sub>4</sub> and N<sub>2</sub>O emissions in plants for generating electricity from biomass combustion through continuous monitoring of the levels of combustion and the adjustment of associated parameters.
- Pilot transformation cell facility without SF6.
- Redesign of prefabricated buildings for new photovoltaic and wind energy developments for them to be zero emission.

GHG EMISSIONS. SCOPES 1, 2, 3 AND TOTAL EMISSIONS

GHG emissions

The GHG emissions generated are calculated according to the criteria defined in the GHG Protocol, under the financial control scheme, consolidating the emissions corresponding to all GHGs relevant to the company as being CO<sub>2</sub> equivalent: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFC and SF<sub>6</sub>. The criterion for the consolidation of energy consumption and other emissions follows the same accounting criterion.

THE EMISSION FACTORS USED ARE THOSE INDICATED BY:

- Intergovernmental Panel on Climate Change (IPCC), in the 2006 Guidelines for Greenhouse Gas Inventories
- National Inventory of Greenhouse Gases (GHG) of Spain.
- International Energy Agency.
- Red Eléctrica de España (*the Spanish grid operator*).
- ACCIONA Green Energy.
- *The UK Department for Environment, Food and Rural Affairs.*
- The European Environment Agency.
- European Renewable Energy Directive (RED II).

Scopes 1 & 2

In 2022, ACCIONA Energía’s Scope 1 emissions reached 6,835 tCO<sub>2</sub>e and the Scope 2 market-based emissions reached 3,237 tCO<sub>2</sub>e.

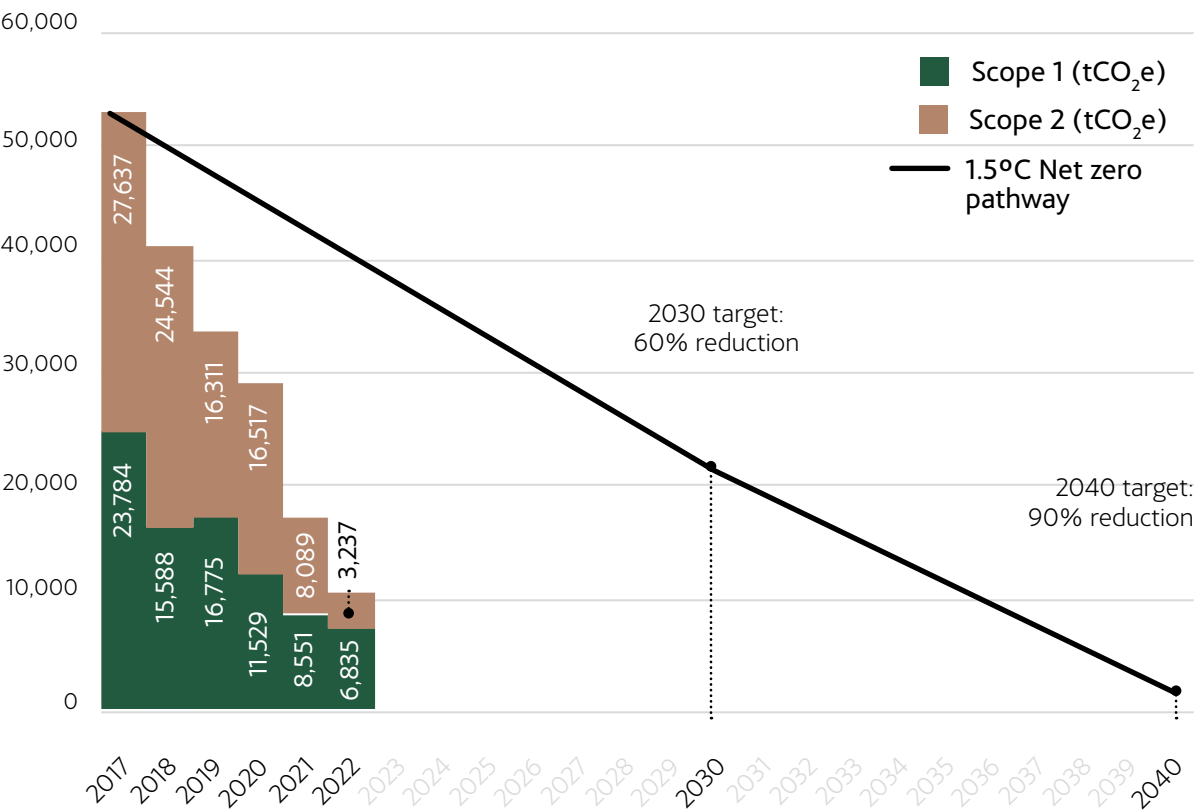
The total of ACCIONA Energía’s Scope 1 + 2 emissions represents 80 % less than the base year 2017, thus complying with the company’s decarbonisation pathway in line with its science-based target (SBT) for 2030. At the same time, the location-based Scope 2 emissions stood at 45,204 tCO<sub>2</sub>e.

The intensity of Scope 1 and 2 emissions of in 2022 was 2.3 tCO<sub>2</sub>e/€M of sales.

The biogenic emissions for 2022 stood at 472,771 tCO<sub>2</sub>e as a result of the burning of biofuels.

None of ACCIONA Energía’s activities are regulated under schemes involving the use of emission rights.

→ EVOLUTION OF SCOPE 1 AND 2 EMISSIONS GENERATED (tCO<sub>2</sub>e)

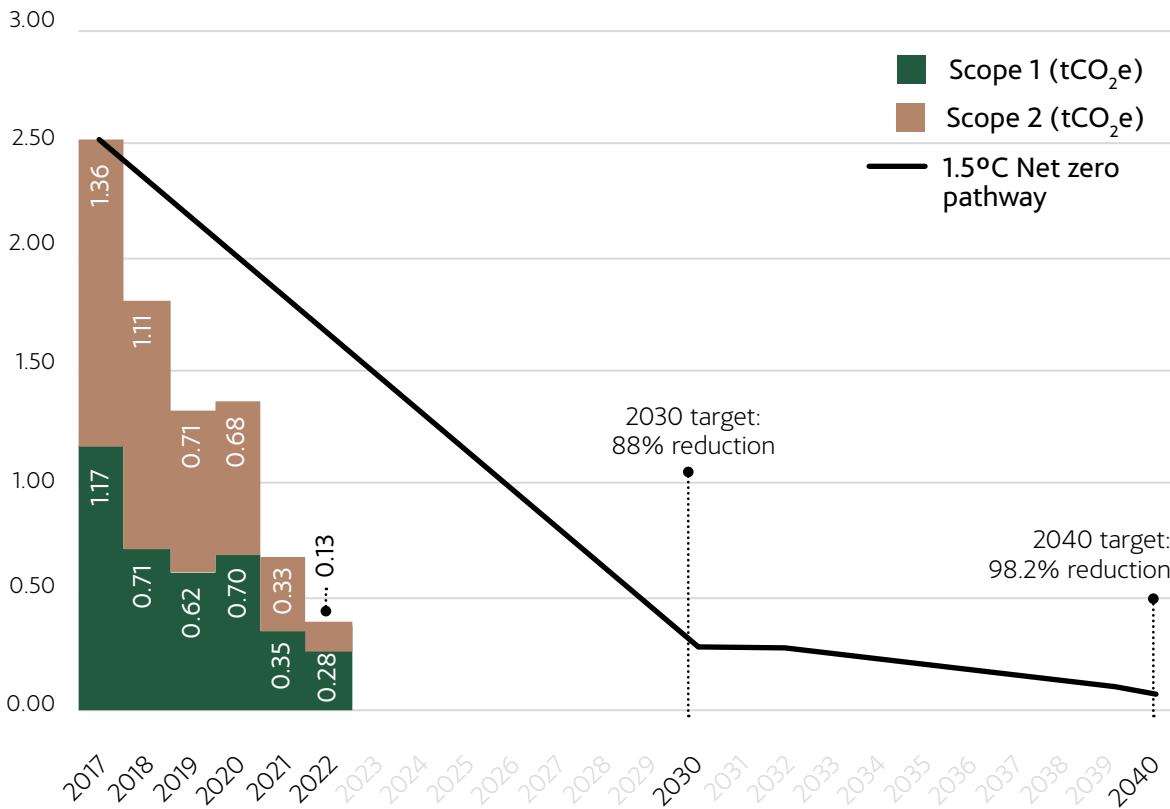


The previous years' figures have been recalculated to include the EROM business line which became part of ACCIONA Energía in 2022

Climate	65	Water	77	Circular Economy	79	Biodiversity	83	Integrated Environmental Management	89
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The fall in GHG emissions was due to an increase in the use of electricity from renewable sources rather than conventional electricity. The implementation of energy efficiency measures has also been particularly important.

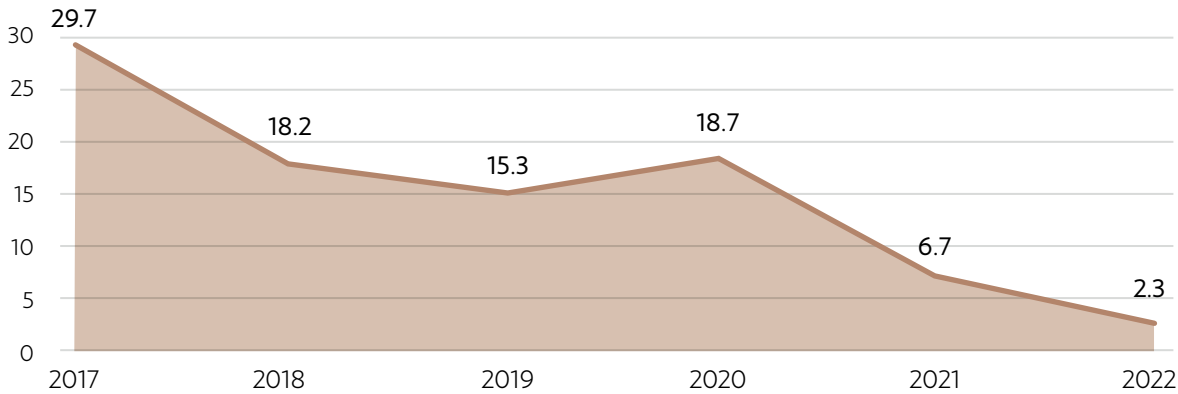
→ INTENSITY OF SCOPE 1 AND 2 GHG EMISSIONS  
tCO<sub>2</sub>e/GWh



The previous years' figures have been recalculated to include the EROM business line.

→ INTENSITY OF SCOPE 1 AND 2 GHG EMISSIONS  
tCO<sub>2</sub>e/€M sales

ACCIONA Energía's carbon intensity value for Scopes 1 and 2 stood at 2.3 tCO<sub>2</sub>e/€M sales.



Scope 3

In 2022, ACCIONA Energía set a science-based target for reducing Scope 3 GHG emissions by 18.08% on the base year 2017 for the following group of categories: Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Transport and upstream distribution of water; Employees travel to work and Use of products sold by the organisation.

Scope 3 emissions figure for these 6 categories went up by 96.83% compared to 2017 (2017 figure: 371,555 tCO<sub>2</sub>e), due to increased purchasing activity to fulfil the forecast growth plan. In the same way, the total Scope 3 emissions have increased.

In 2022, the company continued to implement measures to reduce Scope 3 emissions: use of life cycle analysis tools in project design, inclusion of the risk of climate change (MA/CO<sub>2</sub> variables) in the supplier risk map<sup>10</sup> and sustainability training courses available to suppliers. However, these measures could not offset the greater purchasing activity effect (mainly motivated by the company's strategic plan of increasing the installed renewable power capacity).

→ SCOPE 3 EMISSIONS IN RELEVANT CATEGORIES FOR ACCIONA ENERGÍA

tCO<sub>2</sub>e

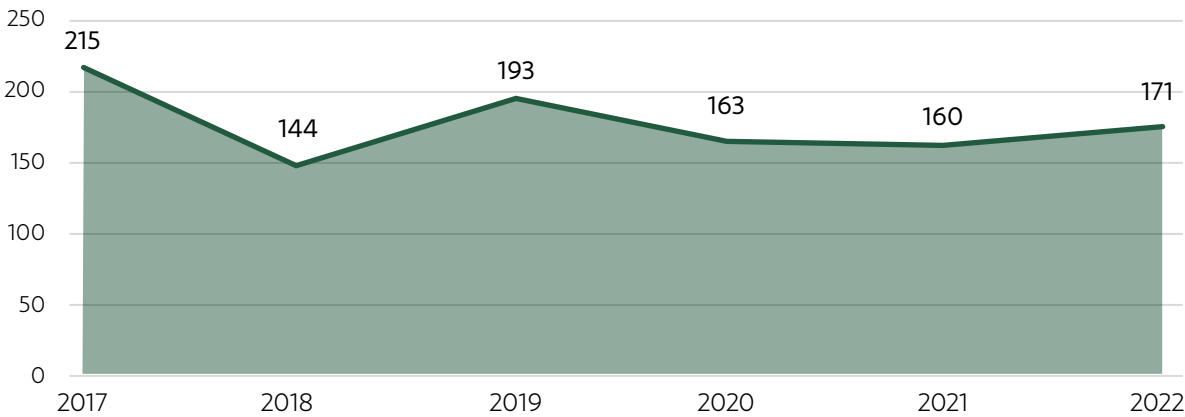
CATEGORY	2017	2018	2019	2020	2021	2022
Purchased goods and services	81,322	96,402	159,752	71,777	169,391	230,231
Capital goods	218,507	172,676	186,670	181,550	211,200	387,185
Energy-related activities (not Scope 1 or Scope 2)	29,549	17,060	16,516	18,350	1,269	22,749
Upstream transport and distribution	39,356	27,040	17,437	10,027	10,034	86,741
Waste generated in operations	0	0	0	1	0	0
Business travels	0	0	0	0	0	0
Employee commuting	2,821	2,788	2,840	2,701	4,141	4,430
Upstream leased assets	0	349	637	2,518	0	0
Use of products sold by the organisation	0	0	0	0	0	0
End-of-life treatment of sold products	0	0	0	0	0	0
Investments	1,181	1,011	1,793	1,075	552	1,185
TOTAL (tCO <sub>2</sub> e)	372,736	317,326	385,645	287,999	396,587	732,521

The previous years' figures have been recalculated to include the EROM business line.

→ INTENSITY OF SCOPE 3 GHG EMISSIONS

tCO<sub>2</sub>e / €M sales

ACCIONA Energía's carbon intensity value for Scope 3 stood at 171 tCO<sub>2</sub>e / €M sales.



Other emissions generated

In 2022, ACCIONA Energía's NOx emissions stood at 608 tonnes, SOx emissions were 173 tonnes, PM<sub>10</sub> emissions were 5 tonnes and SF<sub>6</sub> emissions 0.021 tonnes. The company set the target to reduce this type of emissions by 2.5% compared to the 2017 figures. The target has been met for SOx, PM<sub>10</sub> and SF<sub>6</sub> indicators.

→ EVOLUTION OF OTHER EMISSIONS

Tonnes

	2017	2018	2019	2020	2021	2022
NOx	594	653	604	687	712	608
SOx	180	244	191	138	125	173
PM <sub>10</sub>	9	14	19	6	5.3	5
SF <sub>6</sub>	0.08	0.0501	0.0543	0.0548	0.0316	0.021

The previous years' figures have been recalculated to include the EROM business line.



<sup>10</sup> More information in the chapter [Exponential leadership-Supply chain](#)

INDICATORS RELATED TO CLIMATE CHANGE.

Own energy consumption

In 2022 ACCIONA Energía consumed 1,495,763 TJ of energy, 98% of which came from renewable sources.

The company’s target for reducing GHG emissions for 2022 (23.07% reduction compared to the 2017 figure) inherently entails a target for reducing its consumption of non-renewable energy. This target has been met in the same way as the target for Scope 1 and 2 emissions.

→ ENERGY CONSUMPTION AND MIX  
MWh

CATEGORY	2017	2018	2019	2020	2021	2022
Biomass Fuel	1,189,752	1,220,269	1,179,469	1,249,749	1,271,296	1,287,921
Biogas Fuel	0	0	0	0	0	0
Bioethanol Fuel	0	0	0	0	0	7
Biodiesel Fuel	0	0	0	0	0	453
Total renewable fuels	1,189,752	1,220,269	1,179,469	1,249,749	1,271,296	1,288,381
Renewable Electricity	75,811	38,590	56,404	82,273	249,533	174,774
TOTAL RENEWABLE ENERGY CONSUMPTION	1,265,563	1,258,859	1,235,873	1,332,021	1,520,828	1,463,155
Diesel fuel	12,064	9,446	11,631	11,317	9,841	7,382
Natural gas	49,589	15,307	21,194	17,572	16,288	14,100
Petrol	0	4	5	3	29	93
Propane gas	0	0	0	0	0	0
LPG fuel	0	0	0	0	0	0
TOTAL NON-RENEWABLE FUELS	61,653	24,757	32,830	28,892	26,157	21,575
Non-renewable electricity	70,324	62,683	42,836	43,206	23,942	11,033
Total non-renewable energy consumption	131,977	87,440	75,667	72,099	50,100	32,608
TOTAL (MWh)	1,397,540	1,346,299	1,311,540	1,404,120	1,570,928	1,495,763

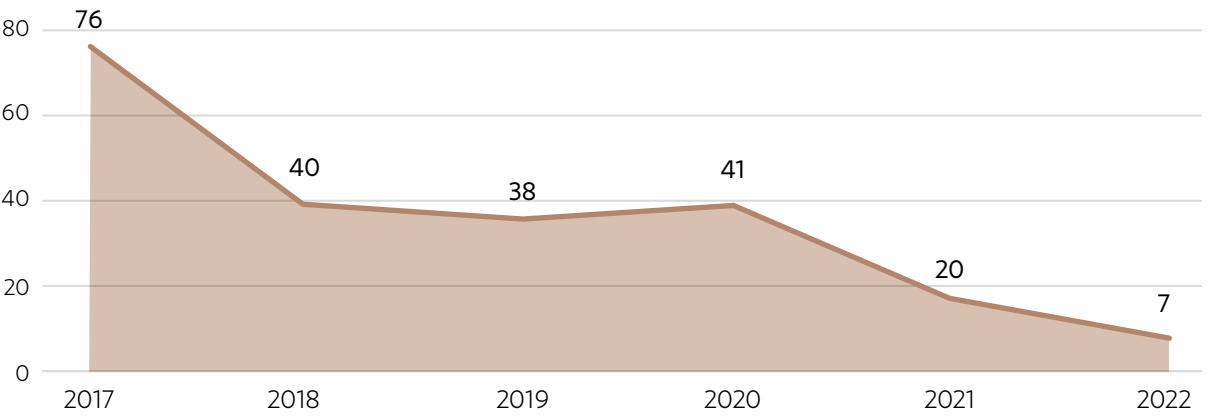
The previous years’ figures have been recalculated to include the EROM business line.

Energy intensity

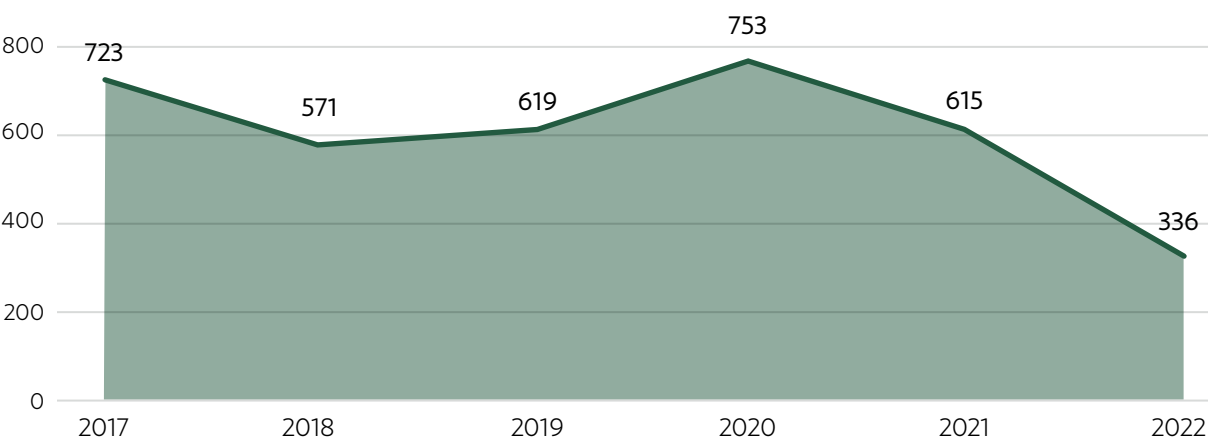
The company’s fossil-fuel energy intensity stood at 7 MWh/€M sales in 2022, while energy intensity from renewable sources was 336 MWh/€M sales.

The energy intensity (total), resulting from adding the two figures above is 343 MWh/€M sales.

→ NON-RENEWABLE ENERGY INTENSITY



→ RENEWABLE ENERGY INTENSITY



Third-party energy consumption

Presented below is the most relevant energy consumption external to the organisation, calculated according to the company’s Scope 3 categories.

The target for reducing Scope 3 GHG emissions of emissions for 2022 inherently entails a target for reducing its external energy consumption.

EXTERNAL ENERGY CONSUMPTION  
MWh

CATEGORY	2018	2019	2020	2021	2022
Purchased goods and services	390,132	548,913	290,306	620,329	952,638
Capital goods	570,522	597.384	651,159	792,094	1,296,714
Energy-related activities (not Scope 1 or Scope 2)	107,944	104,022	115,577	4,848	135,688
Upstream transport and distribution	89,922	59,166	35,148	34,459	274,952
Waste generated in operations	-	-	4	1	0
Business travels	0	0	0	0	0
Employee commuting	10,662	10,909	10,621	16,285	17,427
Upstream leased assets	762	1,449	8,103	0	0
Use of sold products	0	0	0	0	0
End-of-life treatment of sold products	0	0	0	0	0
Investments	6,486	7,780	9,047	9,189	8,138
TOTAL (MWh)	1,176,428	1,329,622	1,119,965	1,477,204	2,685,557

The items Downstream transport and distribution Processing of sold products, Assets leased by the organisation and Franchises are considered irrelevant for ACCIONA Energía either because these activities are not carried out or their consumption is now included in the company's consumption or in another category of external energy consumption.

The consumptions for Business travels are consolidated at ACCIONA group level.

The previous years’ figures have been recalculated to include the EROM business line.

Production of renewable energy and emissions avoided

At the end of 2022, ACCIONA Energía had 11,826 MW of renewable capacity installed, having generated 23,910 GWh. This renewable production avoided the emission into the atmosphere of 13.2 million tonnes of CO<sub>2</sub>e, 9,065 tNOx, 25,086 tSOx and 226 tPM<sub>10</sub>.

EMISSIONS AVOIDED PER COUNTRY BY GENERATING  
RENEWABLE ELECTRICITY

COUNTRIES	INSTALLED CAPACITY (MW)	PRODUCTION (GWh)	EMISSIONS AVOIDED tCO <sub>2</sub> e)
Australia	603	1,075	953,931
Canada	181	524	347,935
Chile	922	2,137	1,802,236
Costa Rica	50	226	210,994
Croatia	30	70	33,146
United States	1,493	2,160	1,292,379
Egypt	186	435	190,204
Spain	5,796	11,720	5,118,497
Hungary	24	40	20,934
India	164	354	322,199
Italy	156	240	106,194
Mexico	1,480	3,723	1,877,789
Poland	101	217	168,223
Portugal	165	364	144,492
Dominican Republic	58	0	0
South Africa	232	484	497,369
Ukraine	100	74	67,534
Vietnam	84	67	65,507
TOTAL	11,826	23,910	13,219,563

\*The calculation of totals was made taking into account all the decimals for each of lines on the table, so the sum of the lines might differ slightly from the total shown



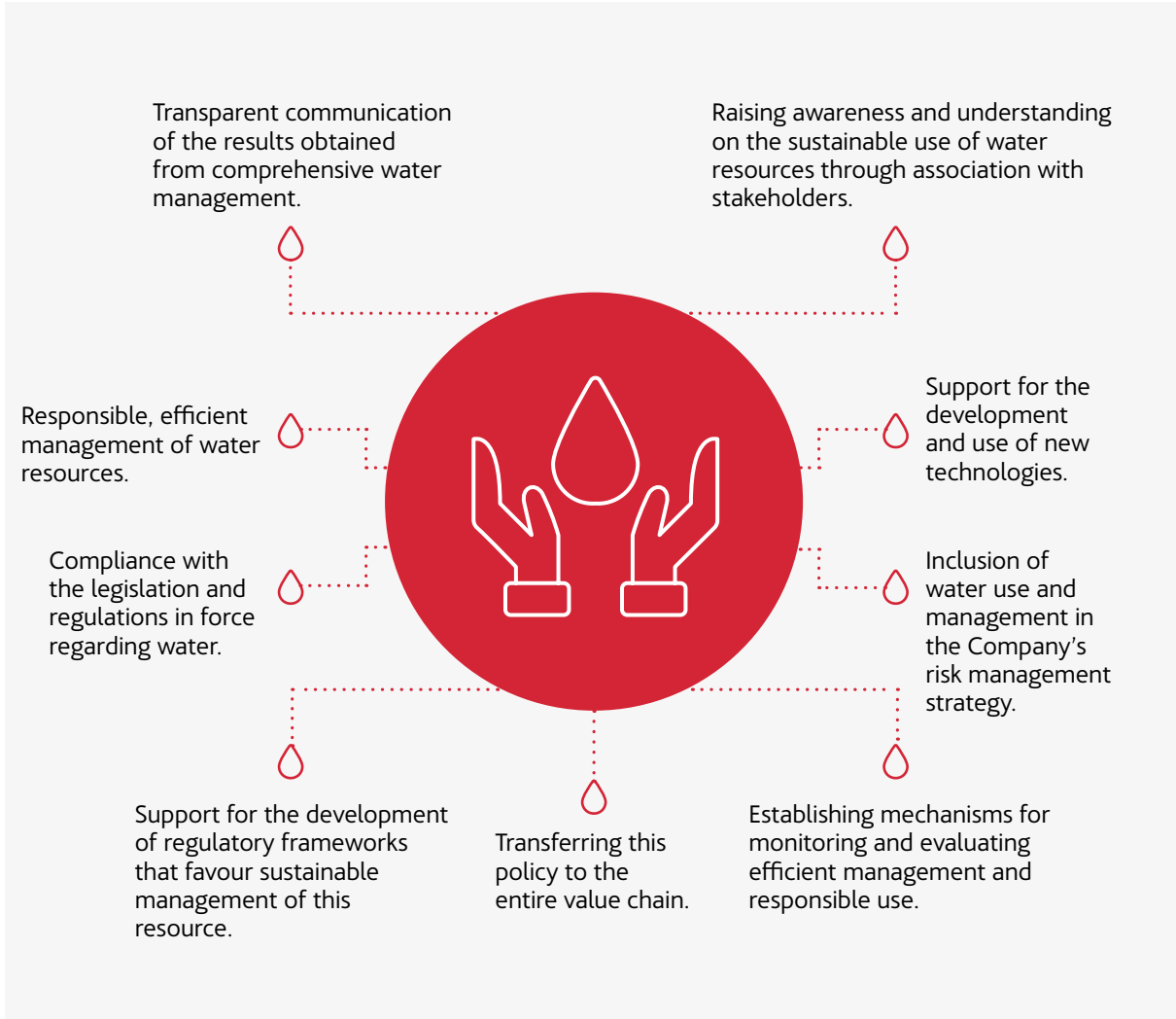
Water

Water is a limited and irreplaceable natural resource. ACCIONA Energía implements its water management strategy based on the availability of the resource, its quality and the balance in the ecosystems in which it is present.

POLICIES REGARDING WATER AND MARINE RESOURCES

ACCIONA Energía has a [Water Policy](#) approved by the ACCIONA Energía Board of Directors' Audit and Sustainability Committee, the main objective of which is to support the fundamental human right of access to drinking water and sanitation.

The principles outlined in this policy can be resumed as:



ACCIONA Energía's water strategy is noted for its strict compliance with the law, responsible and efficient management, the establishment of specific objectives through the Sustainability Master Plan, the development of new technologies, the integration of water into ESG risk management, the extension of its principles to the value chain and transparent communication.

The company establishes prevention measures to minimise possible impacts on species that might be found in river ecosystems and other bodies of water, as well as rules for respecting the environmental flow system in line with the technical requirements set by the pertinent environmental authority.

The processes that guarantee compliance with the requirements for water catchment and discharge are part of the environmental management systems implemented and certified by the company according to the ISO 14001 international standard.

ACCIONA ENERGÍA DEVELOPS ITS WATER MANAGEMENT STRATEGY TAKING INTO ACCOUNT THE AVAILABILITY OF THE RESOURCE, ITS QUALITY AND THE BALANCE OF THE ECOSYSTEMS IN WHICH IT IS FOUND.

OBJECTIVES REGARDING WATER AND MARINE RESOURCES

ACCIONA Energía’s objective regarding water and marine resources, established in its 2025 Sustainability Master Plan, focuses on making the best use of the water resource and reducing its own consumption in countries in a situation of water stress due to the scarcity of water.

In 2022 this objective translated as an 11% reduction in consumption of surface water, groundwater and municipal water in water-stressed countries compared to 2020.

WATER CONSUMPTION

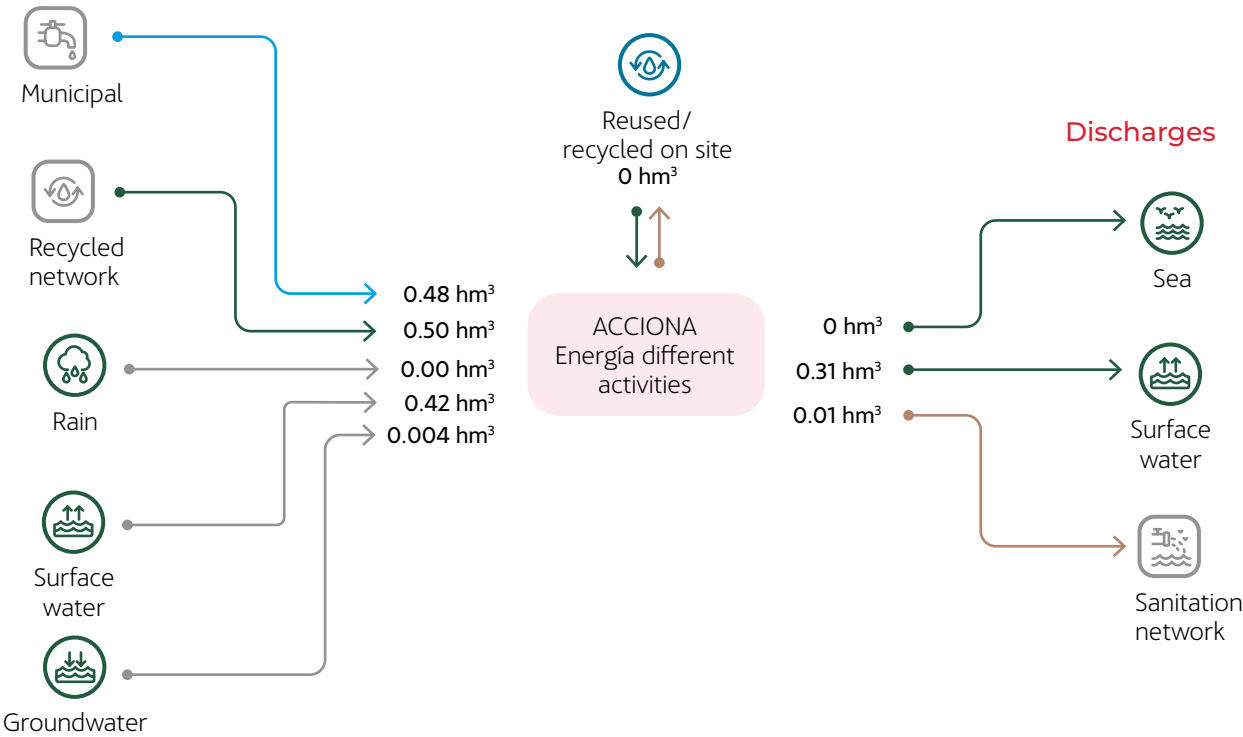
ACCIONA Energía’s use of water

There are 2 different ways in which ACCIONA Energía uses water in its operations:

- 1. **Water for internal consumption:** this is water used by the company at its own facilities. This use includes freshwater catchment such as municipal, surface and underground water. Water sources that do not deplete available natural reserves, such as rainwater, recycled mains water and water reused or recycled on site, complement the water used internally.
- 2. **Discharges:** This refers to the residual water from ACCIONA Energía’s internal consumption that has not evaporated or been used in any company asset and that is removed from the facilities as specified in the relevant discharge permits. All wastewater discharged by the company complies with the specifications in the relevant discharge permits.

→ WATER USAGE IN 2022

Water for internal consumption



The calculation of totals consumption was made taking into account all the decimals for each of lines on the chart, so the sum of the individual amounts might differ slightly from the total shown in the following paragraph.

Water for internal consumption

The total volume of water for ACCIONA Energía’s internal consumption was 1,409,454.93 m³ in 2022, of which 35 % came from rainwater, recycled mains water and water reused or recycled on site.

This consumption has remained very stable compared to the results of previous years. The highest water consumption in the company takes place in its renewable thermal generation plants and is due to the cooling requirements during the production cycle. In this respect, since it began operating the company has implemented measures to guarantee responsible water consumption, equipping its facilities with accumulation reservoirs that make it possible to collect water at the most suitable moments, and also incorporating:

- The use of water collected and returned in equal volume to an agricultural irrigation channel in the Sangüesa biomass plant.
- The use of water coming from an external recycled water network in the Briviesca biomass plant.

At the same time, in water-stressed countries, ACCIONA Energía’s consumption of water coming from surface water, groundwater and municipal water stood at 1,132 m³, a 45% drop compared to 2020, thus complying with the SMP target for 2022.

ACCIONA Energía calculates the water consumption (surface and groundwater) associated with its suppliers, resulting in just over 7 hm³ for its direct suppliers and 24 hm³ for its entire supply chain.

Discharge and bodies of water significantly affected by catchment

In ACCIONA Energía water catchment and discharge are necessary to carry out certain activities. The company uses prevention measures, such as water treatment prior to discharge or the installation of systems that improve the connectivity between river sections, that help minimise any potential impacts on species in river ecosystems. This also guarantees respect for the system of environmental flows and other technical requirements established by the competent environmental authorities.

The same as for the volume of water for internal use, the volume of discharge generated has remained very stable over the years, standing at 325,725 m³ in 2022.



Circular economy

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Increased cost of raw materials</li><li>• Higher operating cost</li></ul>	<ul style="list-style-type: none"><li>• Increased cost of raw materials</li></ul>

A circular economy model seeks to extend the value of products and materials for the longest possible time, minimizing waste and conserving resources within the economy once a product has reached the end of its useful life so that it can be reused repeatedly and continue to create value.

In the field of renewable energies in which ACCIONA Energía operates, the transition towards a circular economy will not only enable a significant reduction in environmental impact and the use of natural resources, but will also provide new economic opportunities deriving from competitive advantage. The development of appropriate processes will also enable better restitution and restoration of natural capital.

CIRCULAR COMMITMENT

Since 2021, ACCIONA Energía has had a [Circular Economy Policy](#) that establishes a framework for action focused on the regeneration of environments and the creation of positive renewable energy balances by eliminating virgin materials. The objective is the complete circularity of materials incorporated into company processes.

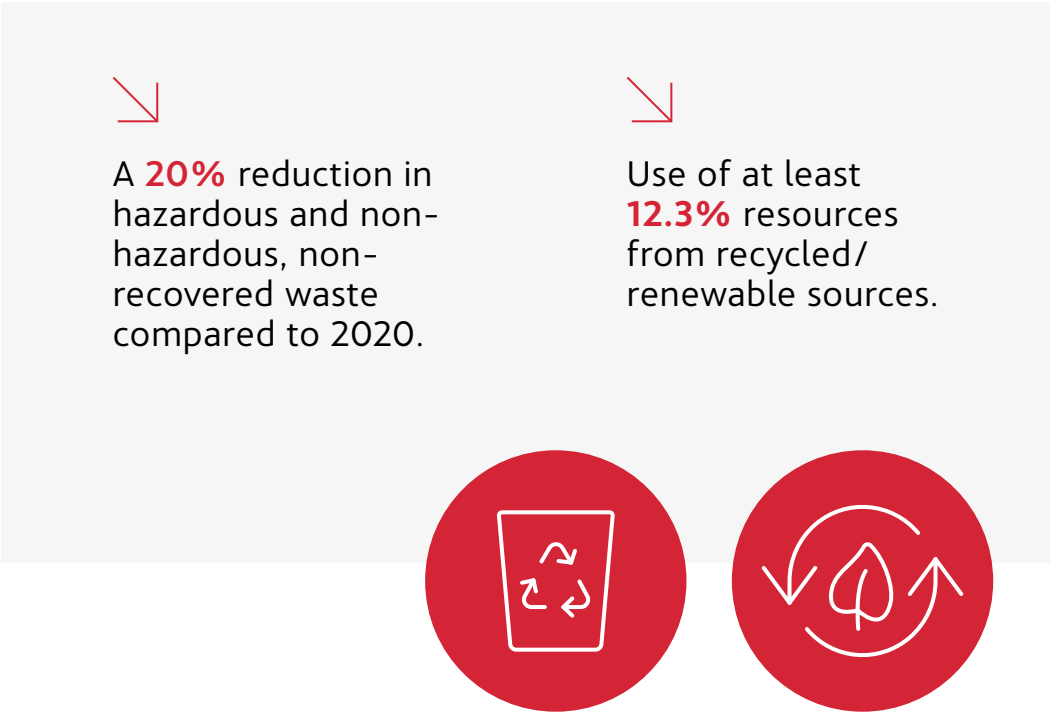
The commitment to achieving these goals translates into prioritising reduction of resource use and increasing the use of recycled water, renewable energy, and recycled and renewable materials in company processes. This approach turns waste into potential raw materials and integrates the circular economy into ESG risk management.



OBJECTIVES REGARDING CIRCULAR ECONOMY AND USE OF RESOURCES

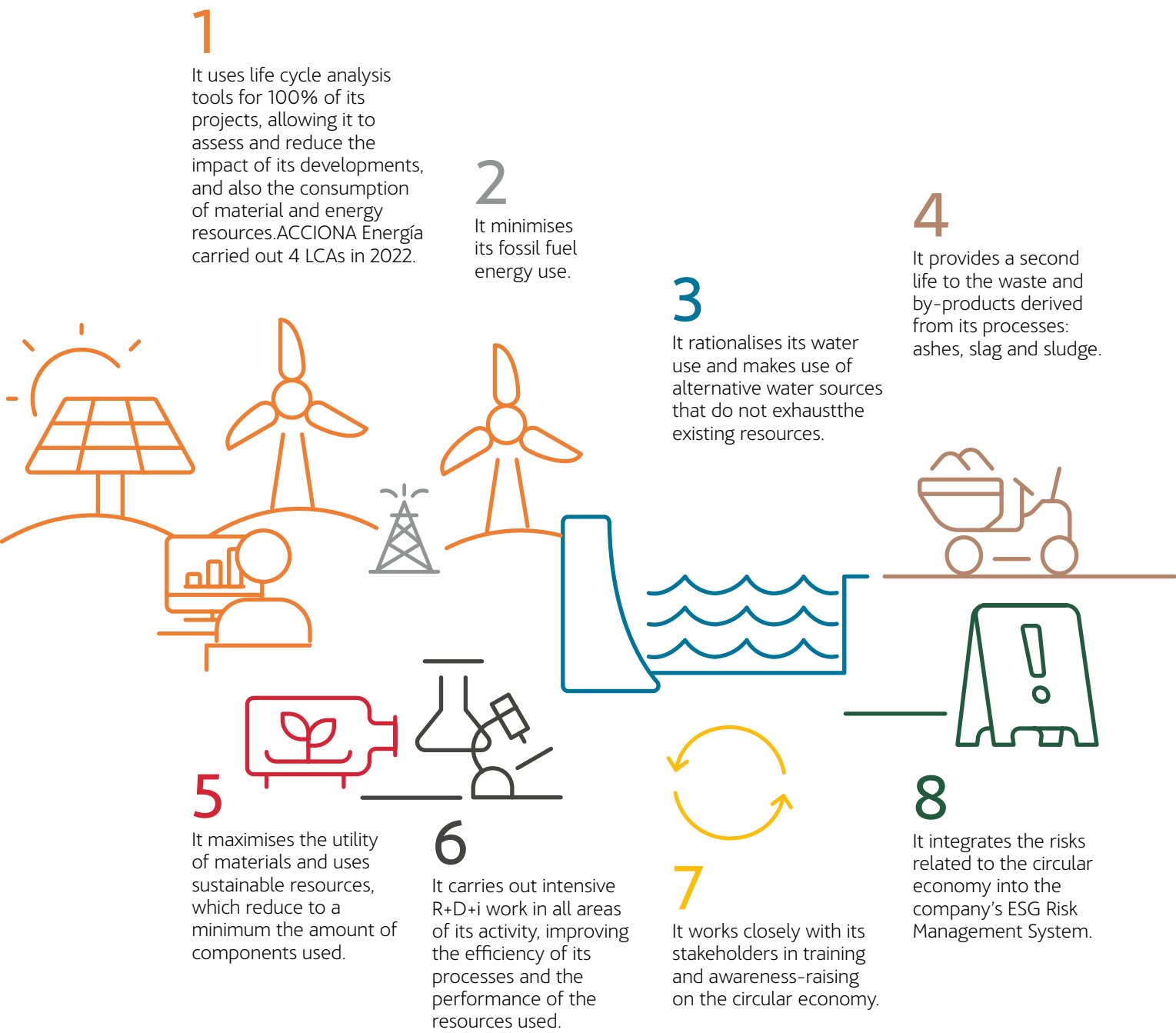
Within the new framework of the 2025 Sustainability Master Plan, ACCIONA Energía has resolved to increase its efforts in the area of the circular economy, and to halve the amount of non-recovered waste compared to 2020, and to double the percentage of renewable and/or recycled resources used by the company.

In 2022 this commitment has translated into the following targets:



ACTIONS AND RESOURCES IN RESPECT OF THE CIRCULAR ECONOMY AND USE OF RESOURCES

ACCIONA Energía’s environmental policies seek to encourage process changes that promote the company’s positive footprint on the planet. Actions that demonstrate ACCIONA Energía’s performance in this area include:



USE OF RESOURCES AND GENERATION OF WASTE

Use of resources

Total resource consumption in 2022 was 26,018 tonnes, which represents a reduction on the previous year, mainly due to a decrease in construction activity with own resources compared to 2021. The percentage of materials from recycled or renewable sources was 13.3% in 2022.

→ CONSUMPTION OF RESOURCES

	2018	2019	2020	2021	2022
Recycled or renewable resources (tonnes)	-	-	21,840	19,284	3,463
Recycled or renewable resources (%)	-	-	8.8%	8.6%	13.3%
Total resources (tonnes)	387	318	248,388	225,303	26,018

The previous years’ figures have been recalculated to include the EROM business line.

Circularity in the management of waste from turbine blades

The management of turbine blades at the end of their useful life poses a challenge for carrying it out with the least environmental impact possible.

While waste of this type currently represents a very small amount for ACCIONA Energía, the company is already working on the development of solutions for recycling or re-using the materials making up turbine blades (basically fibres and resin, in equal parts).

In this respect, in 2022 it has unfolded an innovative demonstration project consisting of recycling the materials from their blades so they can be used in the construction of new ACCIONA Energía photovoltaic plants. The project consisted of manufacturing frames from Fiber-Reinforced Polymer (FRP) using pultrusion technology, and with this substituting the steel frames in the structure that supports the photovoltaic panels for this recycled material.

Four 8.4 metre long 100x100x15mm torsion beams were manufactured and installed in the Extremadura I photovoltaic plant, which has allowed the recovery of 70 kg of fibre. This means it would now be possible to use up to 4,400 kg of recovered beam per MWp in a photovoltaic plant of similar characteristics. These beams are currently undergoing testing and validation.

This project provides a second life for materials. In the first-time use, clean energy is generated from the wind, and in its second life, clean energy is produced from the sun. The same material has a double positive impact on the environment by producing renewable energy.



Waste generation and management

2022 saw a slight reduction in the company’s waste generation. The percentage of waste sent to landfill also continues to decrease. The amount of hazardous waste generated has gone up compared to 2021 but remains low. 34,202 tonnes of non-hazardous waste were generated during the year, of which 402 were sent to landfill (66% less than the previous year, thus achieving the company’s target) and 33,800 were recovered (reuse, recycling or other channels). The latter figure constitutes 99% of the total non-hazardous waste generation.

The reuse of 29,107 tonnes of slags and 3,012 tonnes of ashes must be highlighted, representing 100% legally recoverable slags and ashes generated in ACCIONA Energía biomass plants.

WASTE GENERATION AND MANAGEMENT

	2018	2019	2020	2021	2022
TOTAL NON-HAZARDOUS WASTE (tonnes)	36,048	31,645	34,546	36,004	34,202
Non-hazardous waste to landfill (tonnes)	8,265	3,474	2,335	1,188	402
% of non-hazardous waste to landfill	23%	11%	7%	3%	1%
Non-hazardous waste recovered (tonnes)	27,783	28,171	32,211	34,816	33,800
% Non-hazardous waste recovered	77%	89%	93%	97%	99%
TOTAL HAZARDOUS WASTE (tonnes)	7,126	836	749	634	815
Hazardous waste to landfill (tonnes)	-	-	164	86	234
% of hazardous waste to landfill	-	-	22%	14%	29%
Hazardous waste recovered (tonnes)	-	-	585	548	581
% Hazardous waste recovered	-	-	78%	86%	71%

The previous years’ figures have been recalculated to include the EROM business line.



## Biodiversity

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Significant	<ul style="list-style-type: none"><li>Increased cost of raw materials</li><li>Greater regulatory burden</li><li>Decreased revenue</li></ul>	<ul style="list-style-type: none"><li>Increase in asset value</li></ul>

The Sustainability Master Plan underlines ACCIONA Energía’s commitment to the protection and restoration of biodiversity and the target of achieving Net Positive Impact in all of the company’s projects through the application of the mitigation hierarchy and nature-based solutions.

ACCIONA Energía is committed to achieving No Net Loss (in the medium term) and Net Gain or Net Positive Impact (in the medium to long term) in biodiversity and ecosystem services. Strict compliance with environmental impact legislation ensures that these impacts are minimised, while the mechanisms of ACCIONA Energía’s certified environmental management systems strengthen, and in some cases, even exceed compliance. However, certain unavoidable residual impacts may escape the legislative requirements in some geographic areas. In this regard, ACCIONA Energía is working on the evolution of its environmental management systems to ensure that this type of impact is also avoided, reduced, restored or offset. This commitment is extended to the company’s suppliers, contractors and collaborators.

In line with this commitment, ACCIONA Energía has set a No Gross Deforestation target. The company understands the importance of reducing global deforestation, which includes any deforestation associated with the basic products and services generated, marketed and/or sold by the company.

This commitment is reflected in the planting of 540,000 trees (in addition to those already envisaged as an offsetting measure in some projects) during the five years of the SMP. With this ACCIONA Energía aims to achieve the No Net Deforestation target and offset the loss of biodiversity with future voluntary plantations.

### POLICIES ON BIODIVERSITY AND ECOSYSTEMS

Acciona Energía’s [Biodiversity Policy](#) not only promotes the conservation and responsible use of natural heritage as a necessary vehicle for economic development and social progress, but also as a key high-value asset in its own right.

#### The principles established in the policy are comprised within the following topics:

Conservation, protection and improvement of the environment through specific actions.

Control and compensation of the impacts generated company activities.

Dissemination and promotion of knowledge and training in biodiversity conservation; high lighting and communicating actions carried out; and promoting good practices.

Collaboration with public administrations, local communities, social organisations and other stakeholders for implementing measures for the conservation, raising awareness of and research into biodiversity.



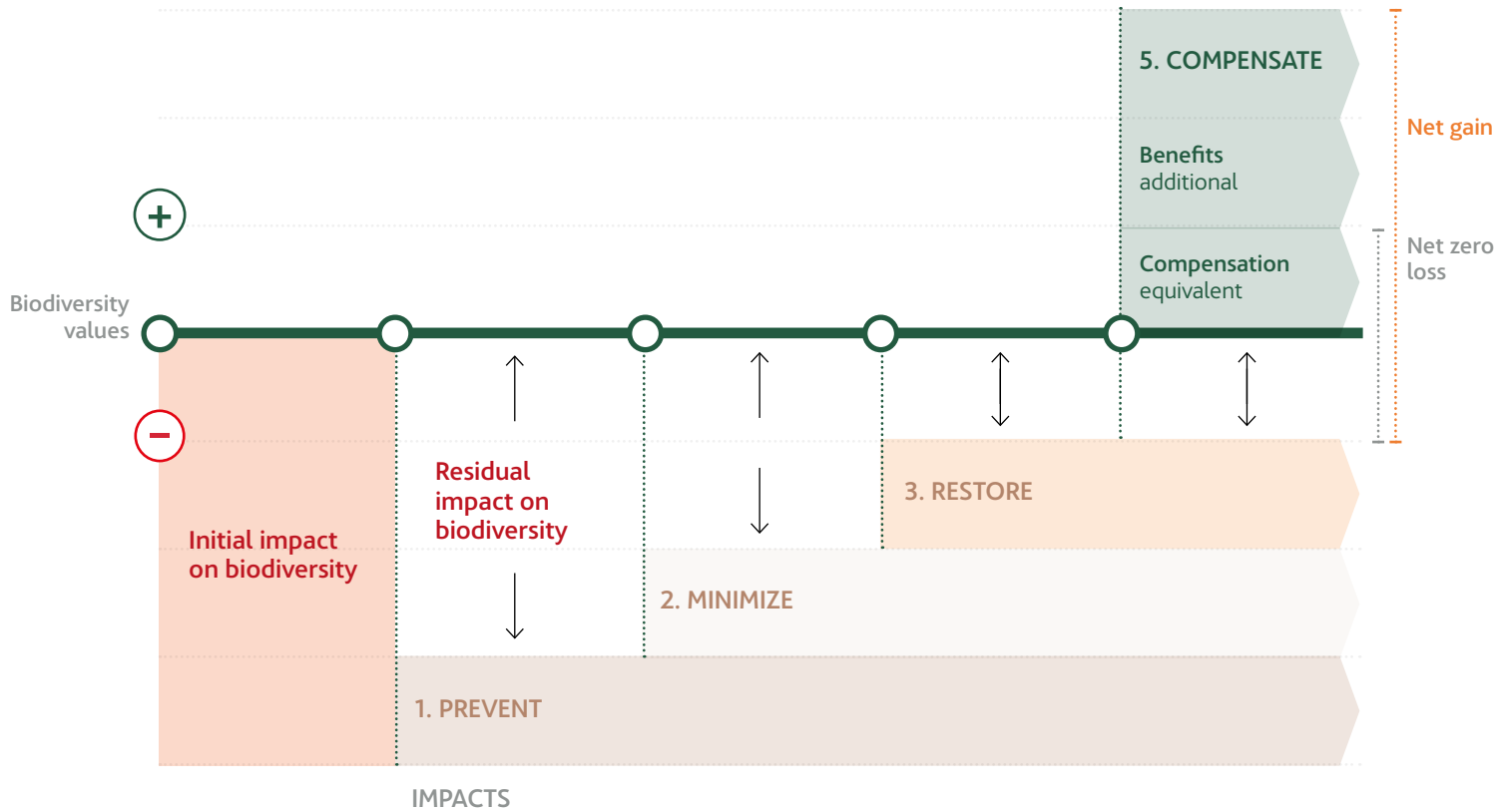
### Hierarchy of mitigation in biodiversity

ACCIONA Energía accords priority to the hierarchy strategy of mitigating impacts on biodiversity, identifying and preventing possible negative effects, minimising those that cannot be avoided, applying restoration actions and, finally, taking compensatory measures in line with its Biodiversity Policy.

The company also develops environmental surveillance plans to control and monitor the initiatives made.

Climate	65	Water	77	Circular Economy	79	Biodiversity	83	Integrated Environmental Management	89
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→ HIERARCHY OF MITIGATION DIAGRAM



Management of risks related to biodiversity and the ecosystems

The company's Risk Management System integrates the variables and risks related to biodiversity through the specific ESG Risk Management procedure. From this procedure it can be concluded that:

- 14% of the total risk score is awarded for the ESG variable “Biodiversity and protected areas” in the risks and centres assessed.
- The countries with the highest average risk score for the ESG variable “Biodiversity and protected areas” in ACCIONA Energía’s centres were Costa Rica, Croatia and Portugal.

The ESG variable “Biodiversity and protected areas” is determined on the basis of existing biodiversity levels, the protection offered by conservation classifications, and the associated degree of control with respect to the geolocation of the facility being assessed.

In 2022 ACCIONA Energía also participated in two pilot projects relating to the assessment of nature-related risks following the methodology developed within the framework of the Task Force on Nature-related Financial Disclosures (TNFD).





## TNFD framework: Management of nature-related risks in four ACCIONA Energía pilot projects

The Task Force on Nature-related Financial Disclosures (TNFD) is a global initiative driven by the need to integrate nature-related risks into financial and business decisions.

To this end, the TNFD sets out a series of developments to be completed by the end of 2023, based on the four-step LEAP methodology:

- **Locate:** locate activities and ecosystems where the activities will take place.
- **Evaluate:** identify impacts and dependencies.
- **Assess:** analyse risks and opportunities
- **Prepare:** communicate results and report to investors.

In 2022, ACCIONA led the development of four pilot projects (2 of them by ACCIONA Energía) that sought to implement the principles of nature-related risk management based on the information already published by the TNFD. This has allowed for the development of a first version of an internal methodology to be applied to company activities.

The above-mentioned four phases were followed during the implementation of the pilot projects:



### LOCATE

In this phase, we sought to identify the four facilities that would be the most useful to analyse. To this end, the location of more than 1,000 company projects was intersected with up to 10 layers of geographic information relating to the identification of biomass, level of protection, and level of environmental degradation in each location.

Information from public databases quantifying potential impact/dependence of a range of economic activities on various environmental aspects was added to these intersections to generate a point-based ranking system that prioritised the selection of projects. The pilot also considered the identification of projects that reflect the diversity of the company's activities and the speed and accessibility of detailed information.

#### The projects used in the pilot were:

- **Gouda Wind Farm in South Africa**, with over 46 wind turbines installed.
- **Amaraleja Photovoltaic Plant in Portugal**, with a capacity of 45.78 MWp.
- **Construction of Bunbury Out Road Ring (BORR), Australia**, for connecting various motorways.
- **Copiapó desalination plant in Chile**, using a inverse osmosis system.



### EVALUATE

In this phase, the possible dependencies of services provided by nature were assessed, as well as the potential impacts on nature (both direct and generated in the supply chain) for each project.

The assessment of dependencies was based on the analysis carried out in the previous phase, selecting the ecosystem services of greatest potential relevance for each project. The elements of nature that would provide these ecosystem services were then identified. Metrics were then assigned to assess (quantitatively or qualitatively) the identified elements as indicators of the degree of dependence. A more qualitative analysis was also carried out for the supply chain.

Based on the analysis carried out in the previous phase, direct impacts were assessed by selecting the impacts of greatest potential importance for each project. Impact scenarios were subsequently developed to create a scoring and classification system for direct impacts, based on project activity metrics related to the use of environmental elements, metrics for characterising the state of the environment, and indicators related to the degree of environmental management of the project.

The assessment of indirect impacts generated in the supply chain was based on input-output models limited to two types of environmental pressure (land use and climate change), in combination with a model for converting environmental pressure into impact indicators on mean species abundance (MSA).



## Marco TNFD

During the pilot phase, three of the projects identified a priori relevant dependencies on soil stabilisation services, erosion control, and climate regulation, mainly in relation to the transformation of the soil entailed in the project. In terms of direct impacts, the greatest potential impact corresponds to the construction project, followed by the desalination project, with potential impacts related to the degradation of protected areas and effects on water quality.

As far as supply chain impacts are concerned, climate-related impacts were assessed as negligible compared to land use impacts, with similar impact results for both the renewable generation plants and the construction project.



### ASSESS

This phase identified and quantified the nature-related physical and transitional risks for each of the projects in the short, medium and long term. In addition an investigation was also carried out into non-project-related opportunities.

The output obtained in the previous phase was used as a starting point for the different risk situations, although information derived from the environmental assessments of each of the projects was also used. As a general rule, physical risk situations were assessed for the dependencies, while impacts were derived from transitional risks.

For each risk situation raised, the probability of occurrence was assessed in three different timeframes, in accordance with ACCIONA's existing risk assessment methodology, quantitatively evaluating the severity of each situation according to the relevance of the associated dependency/ impact. The combination of probability and occurrence determined the inherent risk of each of the situations considered, which was subsequently contrasted and modified on the basis of interviews with those responsible for each of the projects.

Having carried out the process in accordance with the Company's risk assessment standards, none of the 96 risk situations analysed was considered significant for ACCIONA (either because the impact was not significant or because environmental management minimised the probability of occurrence or severity).

Even so, and considering only inherent risk, the following situations were of note:

- **In the short term:** Increased costs deriving from greater reporting requirements due to ACCIONA's presence in protected ecosystems. This applies especially to the wind farm and potential infringements relating to impact on protected species.
- **In the medium and long term:** transitional risks related to legal non-compliance deriving from the appearance of protection figures (which would not apply in the case of the project) remain significant. In the case of the physical risks, it should be highlighted that the wind farm is exposed to greater risk of extreme events due to loss of vegetation in the surrounding area.



### PREPARE

In this phase of the project, the objective was not so much to classify the information gathered as stipulated under the TNFD, but to analyse the gap existing in the company in relation to these requirements. In this respect opportunities for improvement have been identified. Some of them are considered to be easy to introduce; those related to governance, reporting of results and achievement of objectives. Others such as the introduction of new performance metrics at project level and the standardisation of the processes for identifying dependencies, impacts, risks and opportunities, are considered more complex to implement.

ACTION PLANS AND RESOURCES OF THE POLICIES  
RELATED TO BIODIVERSITY AND ECOSYSTEMS

ACCIONA Energía’s projects take into account the conservation, protection and restoration of habitats and ecosystems that could be affected by its facilities.

Throughout 2022, ACCIONA Energía has protected and restored 27 hectares under the scope of its conservation, protection and restoration measures which involve the net gain in natural capital assets.

Improved biodiversity in  
coal dumps in Palencia



Under an agreement with the Natural Heritage Foundation of Castilla y León, in 2022 ACCIONA Energía financed the restoration of coal dumps of the Las Mercedes mine in the Santullán Valley, belonging to the municipal district of San Cebrián de Mudá (Palencia). The area of plantation, 15 hectares, has high ecological potential due to its proximity to the boundary of the Montaña Palentina Natural Park, and to being within the feeding area of the Cantabrian brown bear. The work for preparation the ground and planting took place in 2022.

The main objective of this plantation is to restore the areas degraded as a result of ceasing the intensive coal mining activity which continued until the end of the 20th century. To minimise the significant impact left by the mining activity, 12,894 trees or plants of 13 different native species with the ability to adapt to the soil conditions of a coal dump have been planted. Some of them are plants with fruit that will provide food for wild animals. This plantation contributes to enhancing biodiversity by improving the topsoil layer and the hydrological system, in addition to reducing any possible run-off, erosion and soil loss, thus supporting the reforestation of the area.

The actions carried out in 2022 for restoring habitats, as well as other work in landscape integration or reforestation in degraded areas or where vegetation is scarce led to a total of 163,888 plantations, of which 123,134<sup>12</sup> were voluntary tree plantations, (in addition to the 74,947 planted in 2021).

With this voluntary plantation work, ACCIONA Energía advances in fulfilling the commitment established in the Master Sustainability Plan on the plantation and monitoring the growth of 540,000 trees during the five-year term of the SMP. This action will promote the management and mitigation of the risks of deforestation with partners, suppliers and other stakeholders.

IMPACT METRICS RELATED TO BIODIVERSITY  
AND ECOSYSTEMS

Biodiversity performance indicators

→ LOCATION WITH RESPECT TO THE PROTECTED AREA

LOCATION WITH RESPECT TO THE PROTECTED AREA	SURFACE (HA)
Internal	1,861
Partially internal	1,075

All ACCIONA Energía centres that represent a possible effect on protected areas and the adjacent biodiversity have specific environmental impact plans and environmental surveillance plans. 152 centres were counted in protected areas in 2022.

Identification and assessment of the most significant impacts

ACCIONA Energía identifies and assesses the most significant impacts of its facilities located in protected and non-protected areas with great biological diversity value. In addition 100% of the company’s operating assets are assessed for their potential

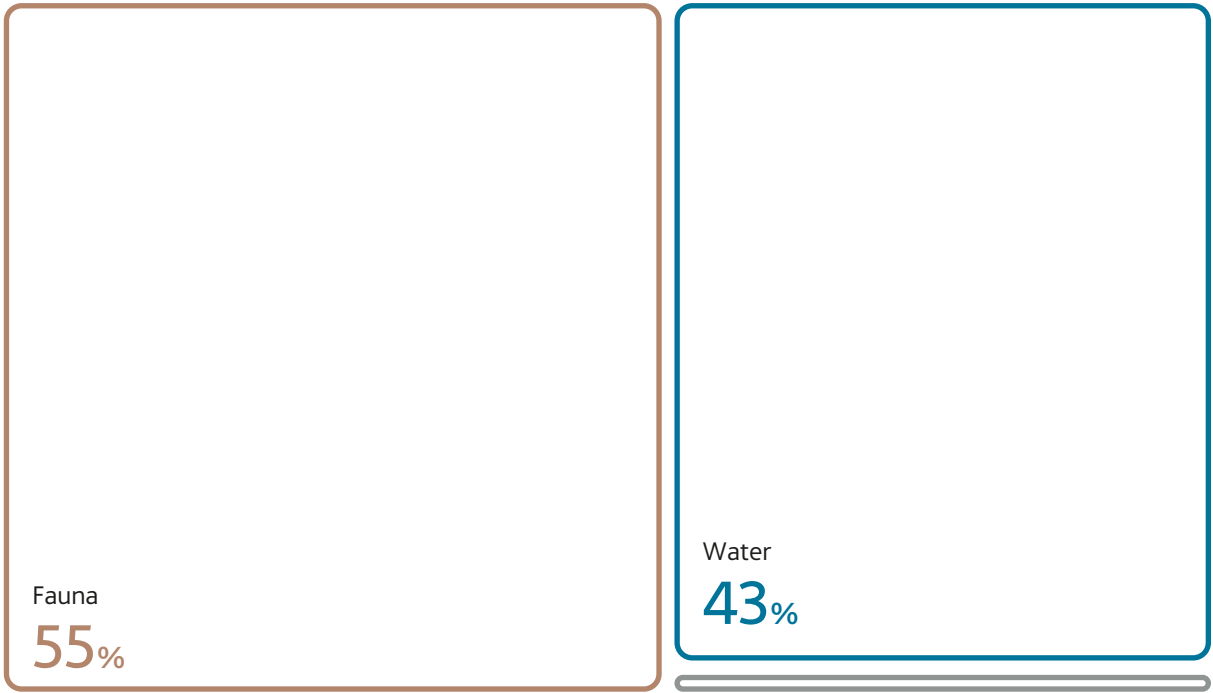
<sup>12</sup> An item for 17,508 trees planted between October and November 2021 in Michoacán (Mexico), is considered as voluntary plantation applicable to 2022 as it was not counted as voluntary plantation in 2021.

effect on the biodiversity and protected areas and are included under the ESG Risk Management System.

In 2022, the most significant impacts were identified in the fauna (55%) and the water (43%), and, to a lesser extent, the habitat.

This assessment took into account the species affected, the surface area of the facility within the protected area, the duration of the impacts, and whether they were reversible or irreversible.

→ MOST SIGNIFICANT ENVIRONMENTAL IMPACTS BY AREA



Protected species

The company identifies the species affected by its facilities according to the Red List of Endangered Species prepared by the International Union for Conservation of Nature (IUCN) and included in National Conservation Catalogues.

The table below shows the number of species and the degree of protection according to the IUCN Red List. Furthermore, it takes into account the species that are not included on this list but are protected by National Catalogues.

→ PROTECTED SPECIES AFFECTED BY ACCIONA ENERGÍA FACILITIES

	IUCN RED LIST PROTECTION CATEGORY	No. OF SPECIES
Extinct	EX	0
Extinct in the Wild	EW	0
Critically Endangered	CR	0
Endangered	EN	1
Vulnerable	VU	3
Near Threatened	NT	4
Least Concern	LC	94
Data Deficient	DD	0
Not Evaluated	NE	0
Other national catalogues		1
TOTAL		103



## Contribution to the biodiversity of large birds of prey, Portugal

As effects had been detected in the electricity plants, an analysis was carried out in 2022 on the situation of the wild rabbit population in the Amaraleja Solar Photovoltaic Plant which revealed an overpopulation of these animals.

In an area close to the plant is the public organisation, Herdade da Contenda, which carries out projects for the protection of local nature and biodiversity, such as the creation of conditions for the reintroduction of the Iberian lynx and the black vulture. To this end they use wild rabbits to introduce them into the food chain of those species.

In view of this situation and taking advantage of the synergy, a scheme has been developed to capture wild rabbits in the Amaraleja Solar Plant, thus reducing the problem of overpopulation and to transfer them to Contenda to support the work of Herdade.

In Contenda the first stage of catching and releasing over 30 wild rabbits took place, which in the medium term will reinforce the local population and the number of large birds of prey. There are high expectations, given the good physical condition of the rabbits caught and as they are perfectly adapted to the climate of this region and to natural predation.



## Integrated environmental management

Industrial activity unavoidably implies an impact on the surrounding environment. ACCIONA Energía therefore prioritises the principle of precaution in all activities in which it is engaged. The comprehensive management of environmental, climate and water-related risks; the reduction and compensation of the emissions generated; the impetus given to the circular economy and the conservation of biodiversity are actions forming part of the company's business model.

In 2022 ACCIONA Energía allocated €22.5 million to the management (prevention, reduction or correction) of the environmental impacts generated by its operations, of which €20.3 million related to expenditures and €2.2 million to investments.

ACCIONA Energía has especially qualified staff in each of the functional, hierarchical and geographical areas of its business. This means that top quality and experience can be employed at all times in pursuing the company's business, always complying with the strictest environmental standards.

The company continues to promote the commitment to environmental training and the development of skills in this field. During the course of 2022, ACCIONA Energía employees received a total of 6,995 hours of training in different areas such as climate change, environmental management systems, waste management and environmental restoration of degraded areas, among others.

### Principles of successful environmental management

ACCIONA Energía bases its environmental management model on the principles of improving environmental performance. This model establishes a common framework of action to coordinate the different management procedures for each of the units identified in the company and defines the aspects associated to the environment from the life cycle perspective, identifying the risks and opportunities as a way of ensuring improvement.

Through the company's environmental management systems, any potentially negative impacts generated by carbon emissions and other harmful gas emissions, discharge and waste generation or the use of resources, as well as noise and light pollution, are identified, evaluated and minimised. In turn, the positive impacts are maximised, both in the project design phase and once the facilities are put into operation.

The verification and certification of the Environmental Management System is carried out by an independent qualified company, in accordance with the ISO 14001 international standard.

The management model is structured taking the following practices as basic principles:



Evaluation and management of environmental impact

In 2022, 100 projects promoted by ACCIONA Energía were subject to Environmental Impact Assessment (EIA). In 10 cases, favourable environmental impact statements were obtained. The EIAs for these projects were published in the corresponding official bulletins and platforms were set up by the Government to channel citizen participation and obtain their feedback in this regard.

In addition, ACCIONA Energía tracked 232 Environmental Monitoring Plans (EMPs) at centres and facilities that were under construction, up and running or under maintenance.

Environmental incidents

ACCIONA Energía registered and identified a total of two environmental incidents in 2022, none of which resulted in any significant spillage (> 0.5 m³ in water / >3 m³ in soil). The management and subsequent rectification, mitigation and/or compensation of the incidents took place in accordance with the company's environmental management systems.

Environmental fines and penalties

In 2022, ACCIONA Energía paid a total of €2,074, corresponding to 1 environmental fine/penalty.

Provisions relating to probable or certain liabilities, litigation in progress and indemnity or outstanding obligations of an undetermined amount of an environmental nature, not covered by the insurance policies taken out, are made at the time when the liability or obligation determining the indemnity or payment arises.

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# EXPONENTIAL LEADERSHIP



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Letter from  
the Chairman

2  
Only in  
renewables

3  
Sustainability  
and materiality  
governance

4  
People centric

5  
Planet  
positive

6  
Exponential  
leadership




7  
Integrate  
to transform

8  
Impact  
per region

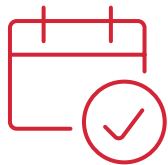
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Appendices

# WE PURSUE A PURPOSE

ACCIONA Energía is not neutral. It has a deep leadership vocation in the sustainable transformation of this decade.

	01 AUTHENTICITY	02 SUSTAINABLE TRANSFORMATIONAL INNOVATION	03 GOVERNANCE	04 TRANSPARENCY
RESPONSIBLE 	COMMITMENT	DIGITALISING	DIVERSITY	REPORTING
RESILIENT 	CONNECT AND SHARE	COLLABORATE TO INNOVATE	RISK CONTROL AND MANAGEMENT	DIALOGUE AND
REGENERATIVE 	ACT AND TRANSFORM	RESPONSES APPLIED	STRATEGIC ALIGNMENT	COOPERATE
	Share the same values, work towards the same purpose in each work centre	Develop a regenerative differentiating innovative value in the principal solutions	Maintain leadership from the governing body for stimulating and supervising the fulfilment of the purpose	Contrast through continuous review

## KEY MILESTONES 2022



- Approval of the new corporate purpose: *Challenge the present to make the future possible.*
- 94% of contracts with local suppliers.
- Obtaining the UNE 19601 and ISO 37001 certifications for the Criminal and Anti-Bribery Compliance Management System in Spain
- Obtaining the UNE 19601 Tax Compliance certification and creation of the Tax Compliance Department.
- Development of the first network for bidirectional charging of electric vehicles which will be operative in Spain: “Vehicle to Grid” (V2G) innovation project.
- Participation and dialogue in the international climate debate, participating in the COP 27 and in associations such as CLG Europe or the WBCSD.

- Diffusion of the new corporate purpose through campaigns and employees training.
- Publication of the ACCIONA Energía Code of Conduct.
- Continuing to strengthen and consolidate the international expansion of the ACCIONA Energía Compliance Model.
- Broadening the corporate report by adding specific reports on Human Rights and Diversity to the current report.
- Consolidation of an ESG budget with key indicators ranging from people and the environment, to environmental impact management.
- Formalising the Internal Control Framework for Non-financial Reporting.

## MAIN CHALLENGES

# 2023



Governance

CORPORATE GOVERNANCE

ACCIONA Energía has new governance bodies created in 2021 when it started trading on the stock market. The Board of Directors and its Committees are firmly committed to promoting good governance and social and environmental sustainability, ensuring creation of value for all of its stakeholders.

The organisation is governed by the recommendations set out in the Good Governance Code of Listed Companies of the National Securities Market Commission (CNMV), and also by the best national and international practices on this subject.

→ ACCIONA ENERGÍA'S GOVERNANCE STRUCTURE



Shareholders and General Shareholders' Meeting

As of the date of this Report, the parent company's share capital was made up of **329,250,589 fully subscribed and paid-up ordinary shares** with a par value of **€1** each, registered in book entries.

In July 2021, and as a result of the [Initial Public Offering \(IPO\)](#), procedure carried out by ACCIONA S.A., shares of ACCIONA Energía representing 17.25 % of the company's share capital were admitted for listing on the stock exchanges of Madrid, Barcelona, Bilbao and Valencia.

→ SHAREHOLDINGS AS OF THE DATE OF PREPARATION OF THIS REPORT



The company's articles of association do not contain any restrictions or maximum limit to shareholders exercising their voting rights. Under the terms of the second recommendation of the Code of Good Governance for Listed Companies, ACCIONA and ACCIONA Energía have entered into a Framework Agreement for Relations which defines the scope of action of each one, the management of any conflicts of interest, the mechanisms for the settlement of any possible disagreements and the regulation of business opportunities, based on the principles of priority and protection of the interests of ACCIONA Energía's minority shareholders. The agreement also sets out the procedure for authorisation and processing any related transactions and the regulation of information flows between both sides.

Every quarter, and in accordance with applicable legislation, the company has reported the transactions carried out in line with the above-mentioned Liquidity Agreement. The market was also informed of a direct purchase made of 200,000 directly held treasury shares under an en bloc transaction.

ACCIONA Energía organises an electronic shareholders’ forum prior to the General Shareholders’ Meeting (GSM) in order to guarantee and facilitate communications with all shareholders, including minority shareholders, pursuant to the terms of the Capital Companies Act. Proposals for adding to the agenda announced in the notice of the General Shareholders’ Meeting applications to join such proposals, initiatives aimed at achieving a sufficient percentage to exercise a minority right provided for by law, and offers and requests for voluntary representation are published there. ACCIONA Energía also establishes permanent channels of communication with its shareholders and investors through its Investor Relations department.

WHAT IS THE USEFULNESS OF THE ELECTRONIC ELECTRONIC SHAREHOLDER FORUM?

Proposals for adding to the agenda announced in the notice of the General Shareholders’ Meeting are published there.

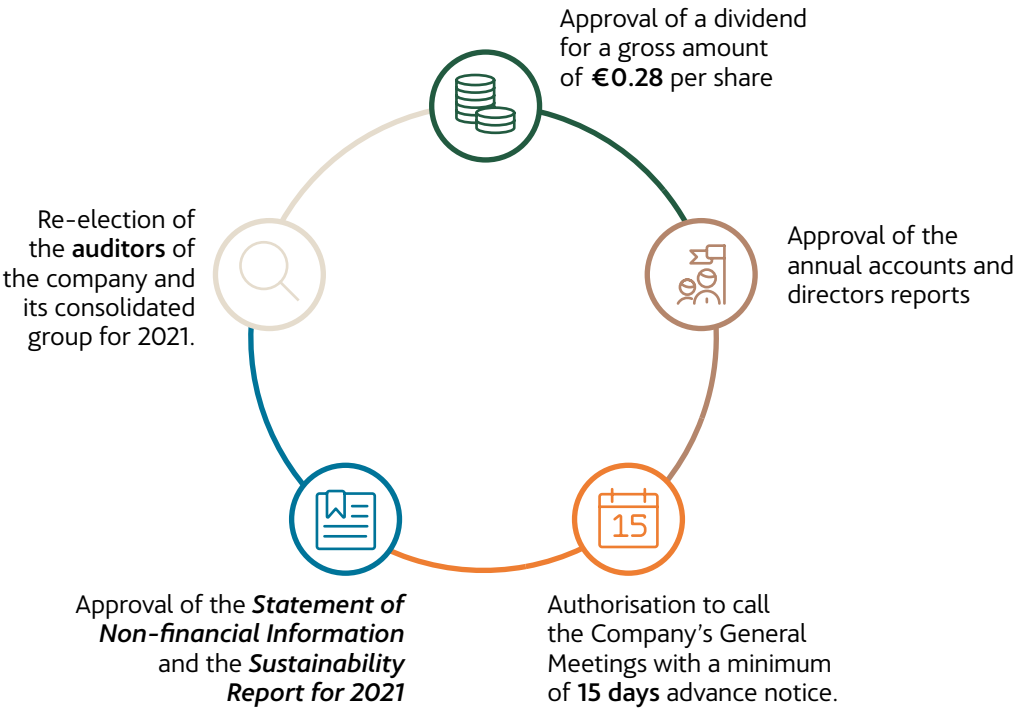
Applications to join such proposals.

Initiatives aimed at achieving a sufficient percentage to exercise a minority right provided for by law.

Offers and requests for voluntary representation.

In addition, when the formal call for the General Shareholders’ Meeting is sent out, and through its web site, ACCIONA Energía makes a system available to shareholders for remote electronic or mail-in voting in order to facilitate the exercising of voting rights. The AGM held in 2022 was a face-to-face meeting with online participation, thus permitting shareholders or their proxies to participate and follow the Meeting, to ask questions or speak, and exercise their voting rights on the different items appearing on the agenda. In its first Shareholders Annual General ‘ Meeting held on 7 April 2022 in first call, various issues were discussed , amongst which the following:

MATTERS DEALT WITH AT THE ORDINARY GENERAL SHAREHOLDERS’ MEETING HELD ON APRIL 7, 2022



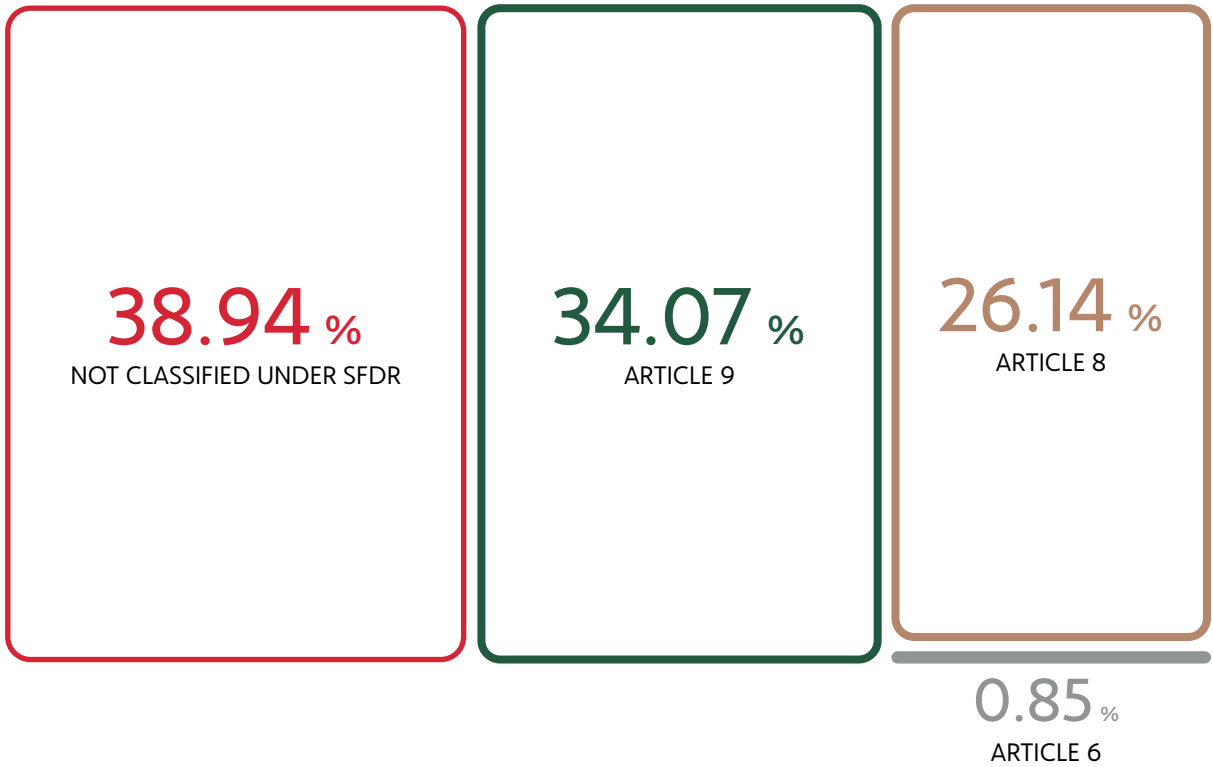
All resolutions were approved with favourable vote of at least **92.81%** of the voting capital in attendance at the Meeting.



Participation of ESG funds in the share structure, according to the new SFDR regulation

Of the total free float (the portion of capital not held by ACCIONA, S.A.) of ACCIONA Energía, 62% is held by ESG-type funds, a mark of investor confidence in the company’s sustainable strategy. 34% of those ESG funds are classified under article 9 of the SFDR, the strictest classification. This is defined as “a Fund whose objective is sustainable investment or the reduction of carbon emissions”.

→ PARTICIPATION OF ESG FUNDS IN THE SHARE STRUCTURE ACCORDING TO SFDR CLASSIFICATION



As the regulation on the classification of ESG Funds continues to develop, ACCIONA Energía participates actively with investors to provide the necessary information on the Principal Adverse Impacts (PAI,) in an exercise of complete transparency.

Board of Directors

The Board of Directors is the body responsible for directing, managing and representing the Company with full powers, notwithstanding the attributions corresponding to the Shareholders General Meeting. Composed of a group of professionals with diversity of knowledge, origins, experiences, nationalities and gender, whose aim is to provide real value to the company, working every day from a position of integrity and transparency in the most efficient and effective way.

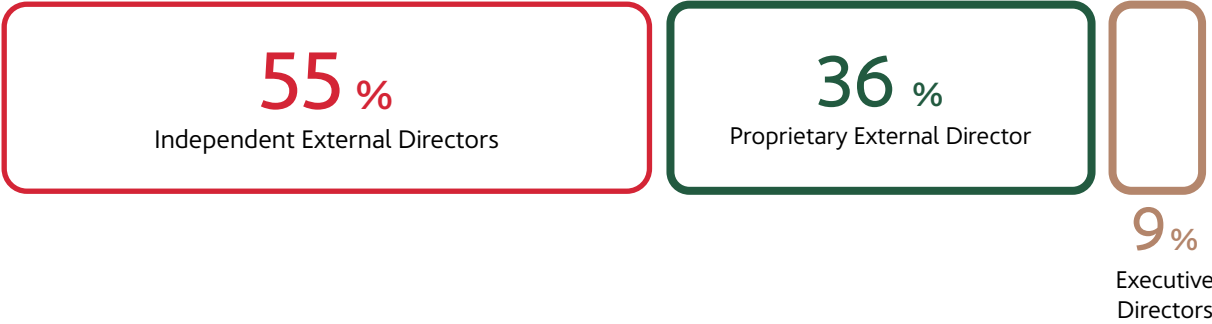
The Board of Directors’ objective is to perform its functions with unity of purpose and independence of judgement, affording all shareholders the same treatment in the same situation and to be guided by company interests, understood as achieving a profitable and sustainable business in the long term which promotes its continuity and maximizing the economic value of the company in benefit of the shareholders, seeking to reconcile it with the legitimate interests of its employees, suppliers, customers and other stakeholders.

The Policy for the Composition of the Board of Directors abides by the recommendations of the Code of Good Corporate Governance and complies with requirements of the Capital Companies Act on the procedures for selecting the members of the Board of Directors (art. 529.bis. 2).

Board members will hold office for two years, and may be re-elected once or more times. The Board of Directors of ACCIONA Energía is composed of eleven members:

- Six are independent directors.
- Four are proprietary directors.
- One is executive director.

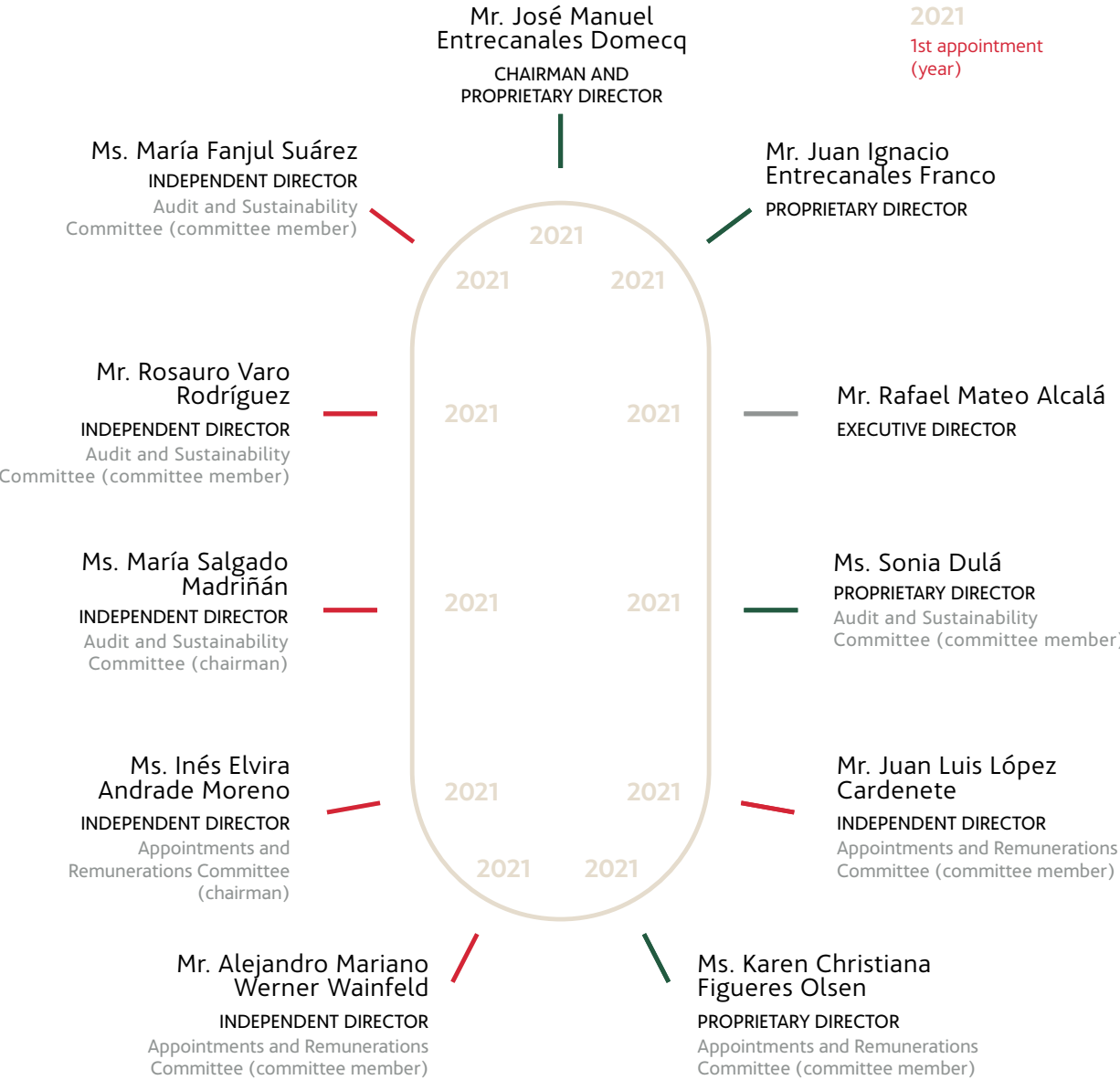
→ COMPOSITION OF THE BOARD ACCORDING TO THE NATURE OF THE POSITION



Governance	93	Sustainable transformative innovation	109	Authenticity	114	Transparency	120	Supply chain	121
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Five women sit on the Board, accounting for 45 % of its total members, which exceeds the target of 40 % established in recommendation 15 of the Code of Good Governance for Listed Companies since its creation. The Appointments and Remunerations Committee will continue to promote measures that encourage the company to have a significant number of female executives. This diversity in the composition (45% are women), has largely contributed to the company receiving a high score of 87 out of 100 on good governance aspects in the S&P Global Ratings on ESG. This is the best ESG score in the energy sector.

→ BOARD OF DIRECTORS AT 31 DECEMBER 2022



→ ATTENDANCE AND MEETINGS OF THE BOARD OF DIRECTORS AND COMMITTEES IN 2022

	BOARD OF DIRECTORS	AUDIT AND SUSTAINABILITY COMMITTEE	APPOINTMENTS AND REMUNERATIONS COMMITTEE
Quorum of attendance	99.09 %	96.43 %	100
No. meetings	10	7	4

In order to respond to current needs, the Board of Directors has a “secure Directors website” that allows members to access the information and foments communication between directors and the secretary, while at all times guaranteeing confidentiality, in addition to being able to hold meetings by video-conferencing in a safe, accessible environment.

To ensure the standard and efficiency of its management, each year the Board of Directors will assess its functioning, including the performance and the input of each member and the diversity in the composition and responsibilities.

The assessment of the performance of the functions and office of each director, the Chairman and the committee chairmen will be conducted on the basis of the report made by the Audit and Sustainability Committee and the Appointments and Remunerations Committee. The assessment of the functioning of the Committees and their officers will be made on the basis of the report made by each Committee to that end.

The evaluation is carried out by means of individual forms that are completed anonymously by each director. Once filled out, the Audit Committee and the Appointments and Remunerations Committee analyse the results and refer the corresponding reports and proposals to the Board of Directors. The Board determines any areas for improvement and supervises any changes that will be introduced. This assessment can be carried out the help of an external consultant.

In compliance with recommendation 36 of the Code of Good Governance for Listed Companies, ACCIONA Energía will perform the evaluations with the support of external consultants, at least every three years, the first assessment with external consultants being planned to take place on the 2023 financial period.

### Management Team

The Management Team is composed of **19 professionals** in Spain and abroad, from different departments and specialisations. The company has notified the CNMV of any members of management who hold offices with managerial responsibilities for the purposes of the provisions of Regulation (EU) no. 596/2014, on market abuse.

The Management Team is the connecting link between the Board of Directors and the rest of the company.

### Remunerations Policy

The [directors' remunerations policy](#) for the years 2021 to 2024 was approved as a separate point on the Agenda of 26 May 2021 and is also included in the Annual Report on Directors' Remunerations approved by ACCIONA Energía in 2022. Article 529 of the Capital Companies Act and Article 29 of ACCIONA Energía's Articles of Association set out the obligation of approving the system for directors' remunerations at least every three years, as a separate point on the Agenda of the Shareholders General Meeting. The directors' remunerations policy was drawn up taking into account the changes introduced under the amendments to the Corporations Act passed in 2021 under Act 5/2021 of 12 April.

### COMPANY REMUNERATIONS POLICY

The company's remunerations policy, including for members of the Board of Directors who exercise executive functions is governed by the following principles:

- 01 Consistency with the business strategy.
- 02 Corporate governance and transparency.
- 03 Balanced design.
- 04 Internal equality.
- 05 Alignment with market practice.
- 06 Linked to employees' conditions.

Further to the above, on 26 May 2021 ACCIONA, S.A. The Board of Directors approved the 2021 Performance Share and Stock Awards Plan aimed at the executive directors of ACCIONA Energía, known internally as "Plan 2021", for the period from 2021 to 2025.

The 21 Plan is linked to the creation of value and its purpose is to guarantee that the evaluation process is based on long-term results and that it takes into account the underlying economic cycle of the company. 80 % is awarded on a deferred basis following the end of the period in question, in this case 2026. The remaining 20 % is transferred to 2027, with at least one year having elapsed since the first award.

The [Annual Report on Directors' Remuneration](#), approved by the Board of Directors, which includes the information on the practical application of the remuneration policy for its members and details the recompense received by each individual director.





ETHICS AND ANTI-CORRUPTION

→ ETHICS AND ANTICORRUPTION  
Corporate conduct

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Higher operating cost</li><li>• Greater regulatory burden</li></ul>	<ul style="list-style-type: none"><li>• Position in the face of greater regulatory burden</li><li>• Increase in asset value</li></ul>

Fight against corruption, bribery and money laundering

The specific policies established in ACCIONA Energía to fight corruption, bribery and money laundering, are as follows:

01

Anti-Corruption Policy

This sets out the group’s clear, specific position against any corrupt orcriminal action, which extends to everyone working in a professional capacity in the company.

02

Crime Prevention and Anti-bribery Policy

This strengthens the group’s zero-tolerance commitment in respect of illegal activities, using permanent monitoring measures for preventing and detecting any such actions, effective mechanisms of communication and awareness-raising in all employees and a corporate culture based on ethics and observance of the laws.

Both Policies were approved by the Board of Directors of ACCIONA Energía.

Governance	93	Sustainable transformative innovation	109	Authenticity	114	Transparency	120	Supply chain	121
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These guidelines have been developed on the basis of international standards and have been implemented in the organisation under corporate regulations and instructions that regulate aspects such as donations and sponsorships, selection of partners and contracting of business consultants, interacting with public officials, gifts and hospitality, international trade sanctions, antitrust compliance, prevention and management of conflicts of interest, selection and ACCIONA Bonus.

The rules deriving from these policies apply to all companies that are part of ACCIONA Energía, to all its employees and to third parties that are related to the company.

The Anti-Corruption Guidelines were approved by ACCIONA's Board of Directors in 2016 and are applicable to the whole ACCIONA Group. They provide specific guidelines to avoid improper conduct, and are applicable and mandatory for each and every employee and all groups associated with ACCIONA Energía (including agents, intermediaries, advisors, consultants and suppliers).

Organisation and management model

The company, in the process of running its business, maintains relations with public administrations and participates in infrastructure bidding processes in various countries. It is therefore necessary to analyse the public corruption risks for each project, based on the country involved and the importance of the operation in question. However, policies and control measures have been put into place to prevent or identify any possible cases of corruption.

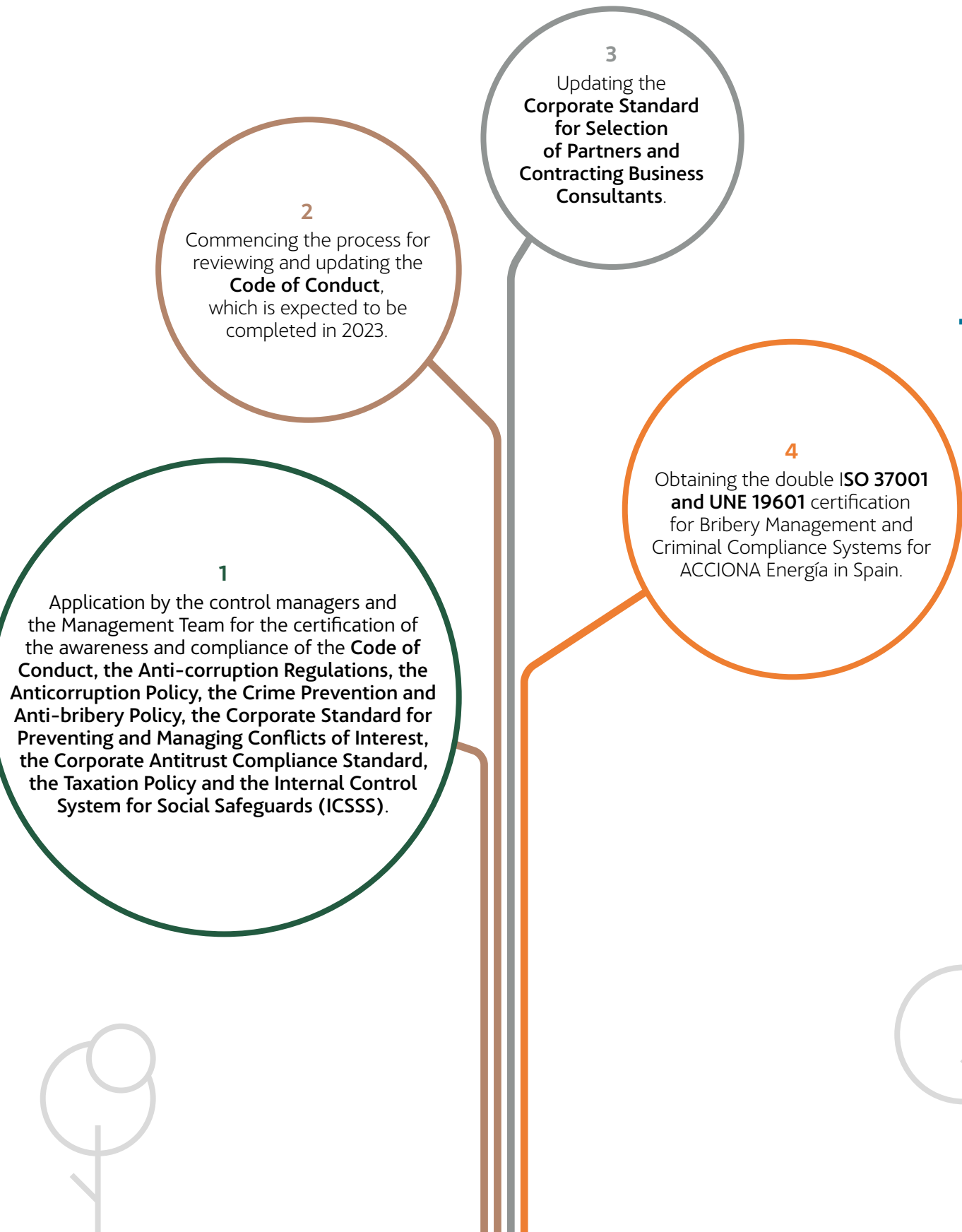
The Compliance Management Office and the Internal Audit Unit supervise the functioning and the effectiveness of the internal procedures, controls and commitments established to ensure that the obligations are fulfilled, whether imposed by law or voluntary, of an ethical, organisational, environmental or social nature, and that any associated risks are prevented, identified and mitigated. The Compliance Office reports to the Audit and Sustainability Committee of the Board of Directors.

ACCIONA Energía has adopted and implemented an Organisation and Management Model for Crime Prevention and Anti-Corruption (MPDYA), the characteristics of which are as follows:

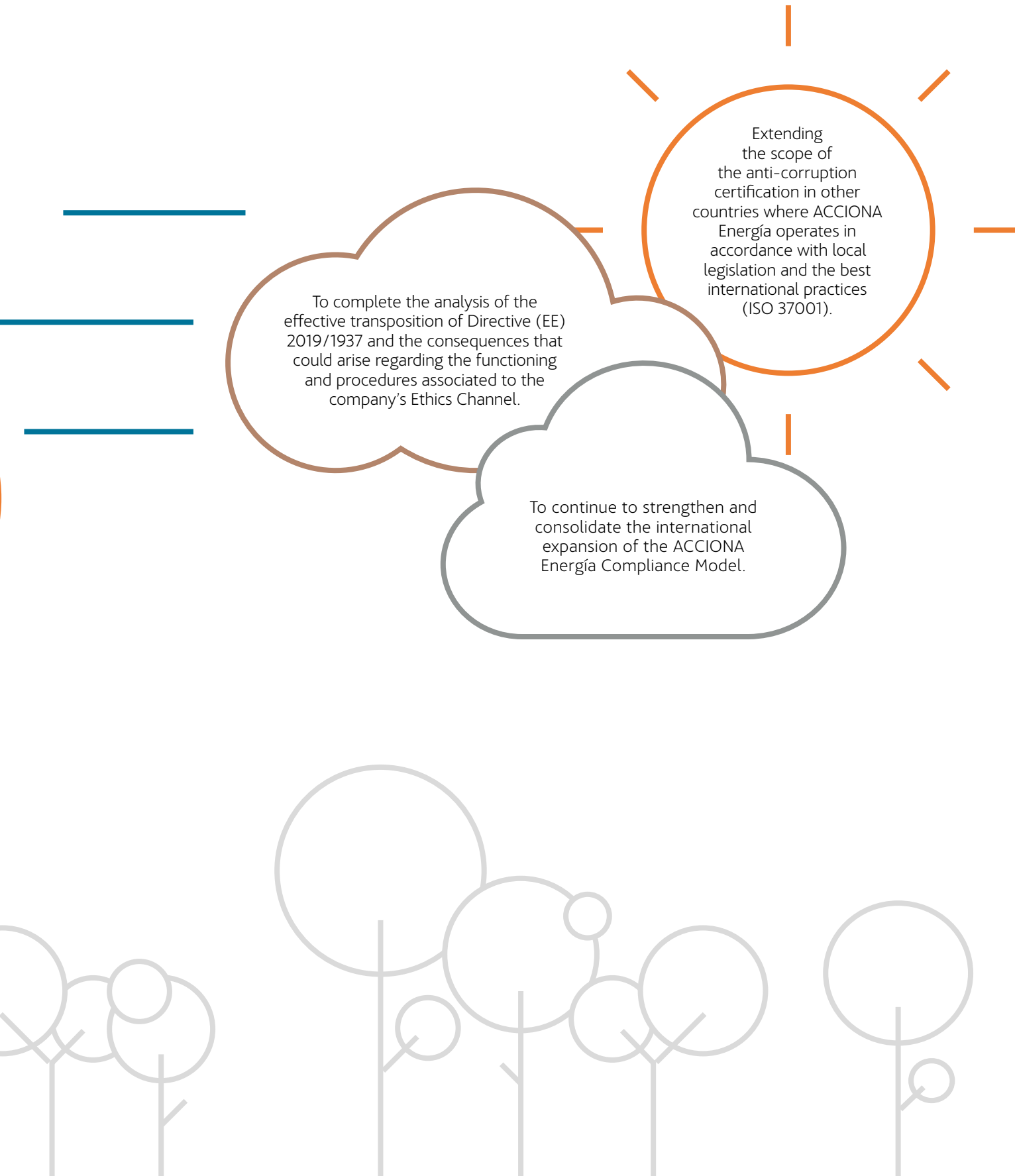
- It is designed taking into account the organisational structure of the company, assigning each department with specific risks of a crime being committed and the corresponding monitoring of those risks.
- Each risk is linked to internal controls that reduce the probability of materialising.
- The internal controls identified have a number of specific attributes determined, amongst others, by the area or department responsible for performing them and the precise description of the monitoring activity.
- The MPDYA includes measures of control belonging to other Internal Control System such as for Financial Information (SCIIF), Social Safeguards (ICSSS) and the Tax Compliance System (TCMS), the objective of which is to prevent the commission of certain risks included under the scope of the MPDYA.
- The risks and controls provided for in the Model are subject to periodic review and supervision.
- The controls provided for in the Model, and also the main corporate regulations related to compliance are subject to yearly certification by the control managers and the Management Team.

With regard to actual corruption risks, none have materialised during the year.

→ THE MAIN INITIATIVES CARRIED OUT IN 2022  
IN THIS FIELD WERE:



→ THE CHALLENGES FOR 2023





ACCIONA ENERGÍA'S ANTI-CORRUPTION STANDARDS

The company expressly forbids:

- 01 Offering or accepting bribes to/from public officials or private individuals.
- 02 Offering or accepting payment for starting or speeding up any administrative procedures.
- 03 Offering or accepting gifts and hospitality to/from public officials or third parties that are contrary to the provisions of these Standards.
- 04 Making contributions for political purposes on behalf of the group.
- 05 Obtaining preferential treatment by using sponsorship or donation as a means for obtaining it.
- 06 Using the company's business relations and contacts in one's own benefit or that of a third party.
- 07 Establishing business relations with third parties without conducting the minimum due diligence required for knowing those third parties.



Code of Conduct and Ethics Channel

The Code of Conduct reflects the values that are to guide the behaviour of all companies making up ACCIONA Energía. Its purpose is to further the consolidation of a corporate conduct accepted and respected by all employees and executives.

By complying with this standard, the company assumes the commitment to carry out its business in accordance with the legislation in force in each of the countries where it operates, always based on the highest international standards. Amongst others: the United Nations Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact.

The Code of Conduct, the Anti-corruption Regulations and the Crime Prevention and Anti-bribery Policy must necessarily be read and accepted by all employees and more than 92% have already accepted them.

The Ethics Channel Committee is responsible for monitoring and compliance with the Code of Conduct, a body in which the most relevant management of the group in matters related to ethics and compliance is represented.

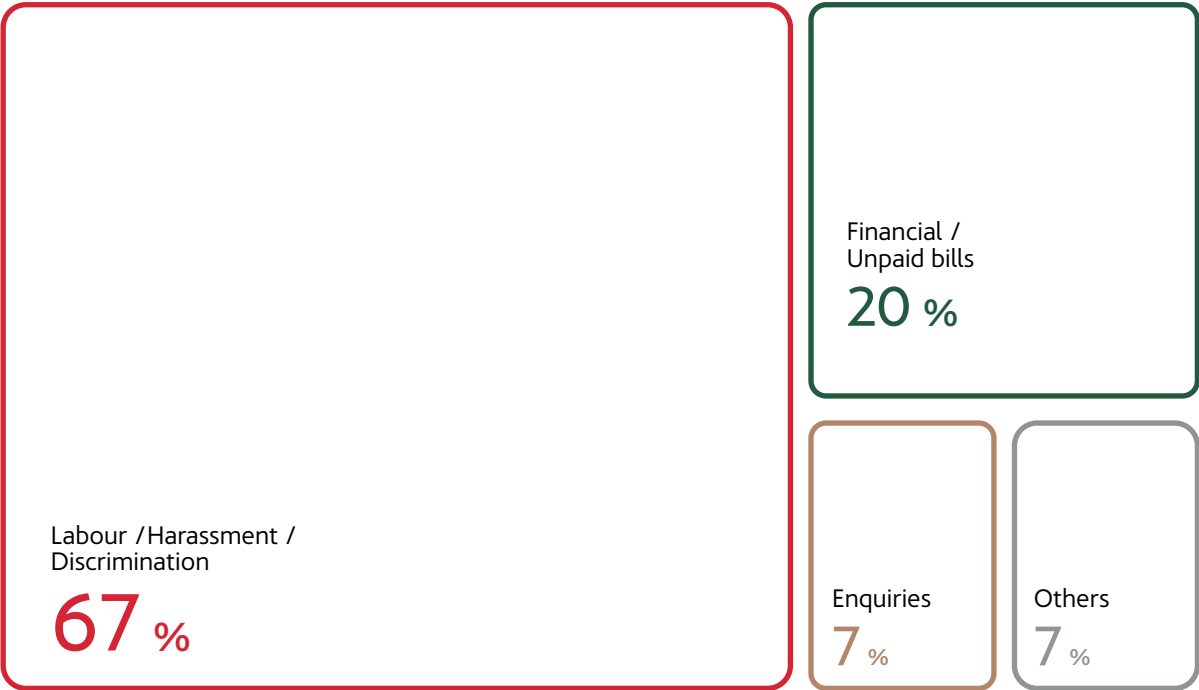
THE ETHICS CHANNEL COMMITTEE HAS THE FOLLOWING FUNCTIONS:

- 01 Encourage the dissemination, knowledge and compliance with the Code of Conduct and, in general, for the ethics and compliance model of the company among the most relevant staff and third parties.
- 02 Facilitate a channel of communication for all the employees, not only to gather and provide information on the compliance with the Code of Conduct, but also to manage the notifications and the queries received and thus facilitate the coordination of their resolution and follow-up. The Ethics Channel makes it possible to confidentially and anonymously report any irregular behaviour related to any case of breach of the Code. It is available on the ACCIONA Energía web site in Spanish, English and Portuguese.
- 03 Report regularly to the Board of Directors, on any complaints received and their resolution, through the Audit and Sustainability Committee.

In 2022, 15 communications were received through this channel:

1. Investigation of **seven procedures** of which three were handled by an external examiner and four by an internal examiner.
2. A further **eight procedures** were closed, either ex officio or because they do not fall within the competence of the Ethics Channel Committee or after having received additional information from the corresponding department or for not having provide the necessary information.

→ TYPE OF REPORTS



→ PROCESSING OF REPORTS IN 2022



Closed without investigation: as the issue is not regulated by the Code of Conduct (anonymous non-financial, purely labour, organisational or functional complaints, notwithstanding the fact that in a large part of the complaints closed, a preliminary investigation was conducted without appointing a specific examiner).

Of the total number of complaints received, ten were work-related. Four of them included grounds for discrimination: two for harassment at work and 2 for sexual harassment. All the cases have been processed. The measures proposed by the examiner have been implemented, such as training courses, team meetings to promote respect and awareness-raising schemes. In the cases of sexual harassment, the corresponding disciplinary measures have been adopted, support has been given to the victims and training and awareness-raising courses on interpersonal relationships in the work teams, were given.

On the other hand, there were no complaints referring to giving or offering bribes or any other type of remuneration or similar consideration, to any individual or public or private entity for the purpose of illegally obtaining or retaining a business or a competitive advantage for the group. Nor have any notifications been received relating to tax issues.

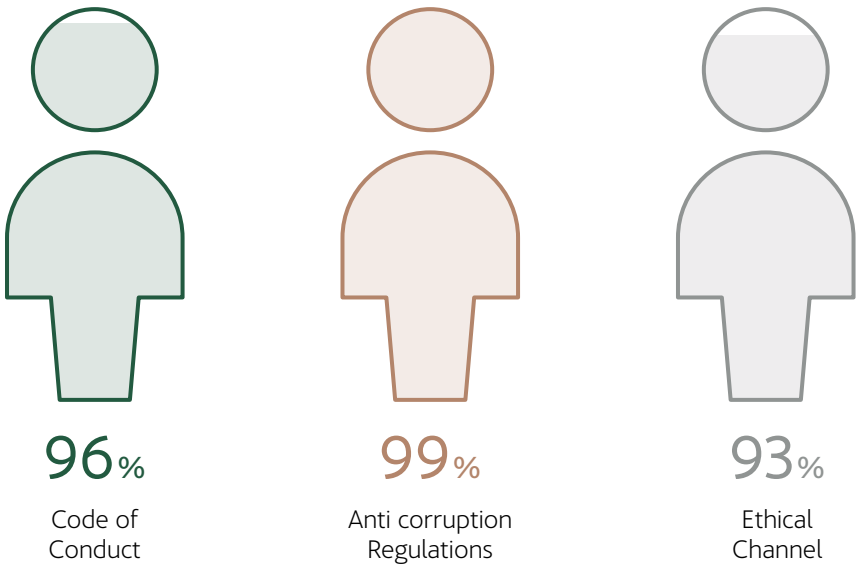
Compliance communication and training

In 2022, 164 communications were made regarding the Code of Conduct, Anti-corruption Regulations, Ethical Channel, conflicts of interest, donations, competency, gifts, sanctions, compliance tools and ethical culture, amongst others. The management team and the employees have received ongoing information on compliance regulations by intranet, emails and a specific newsletter on the subject.

In particular, 55 publications were posted on the intranet which included relevant information on anticorruption relating to issues such as gifts, bribes, intermediaries and agents or interaction with public officials. Publications include three documents relating to antitrust compliance. In general, particular emphasis has been given to the importance of the Ethics Channel for reporting irregularities, and especially those relating to antitrust issues. Awareness-raising work has also been carried out, with regular meetings of the Ethics and Compliance Office team with departments located in the Madrid headquarters. This work will be extended to the rest of the regions in 2023.

FAMILIARITY WITH THE CODE OF CONDUCT, ANTI CORRUPTION REGULATIONS AND ETHICAL CHANNEL

% employees familiar with the Code of Conduct, Anti-Corruption Regulations and Ethic Channel.



ACCIONA ENERGÍA HAS A COMPLIANCE TRAINING PROGRAMME, WHICH INCLUDES A MANDATORY COURSE FOR THE ENTIRE WORKFORCE.

Through the Compliance Survey it is confirmed that 99 % of the employees are familiar with the Code of Conduct, 96 % with the Anti-corruption Regulations and 93 % with the Ethical Channel.

ACCIONA Energía has a Compliance Training Programme, which includes a mandatory course for the entire workforce on the Code of Conduct, and a “Fighting Corruption” course, which is mandatory for those in managerial and executive roles.

Reaffirming the commitment of senior management, this year’s training programme included the launch of a new course to raise awareness of corporate rules for the prevention and management of conflicts of interest, the selection of partners, and the hiring of business consultants.

Global executive training programmes on compliance were also conducted in several of the countries in which ACCIONA Energía operates. These programmes aim to inform on the main corruption risks, referring to specific legislation in each individual country, and to the Code of Conduct, the Ethics Channel, and internal regulations and procedures.

A course on competition was also provided for various ACCIONA Energía departments. Finally, four training sessions were held on environmental crime.

→ TRAINING PER COUNTRY ON THE CODE OF CONDUCT AND IN THE ANTI-CORRUPTION COURSES (No. employees)

Country	CODE OF CONDUCT	ANTI-CORRUPTION COURSE	COURSE ON “THE RIGHT WAY TO WORK”
Spain	239	115	145
Australia	55	10	12
Mexico	61	12	88
United States	185	15	12
Brazil	20	15	14
Canada	4	1	-
Chile	74	39	20
Peru	14	6	4
India	12	20	27
Others	25	13	19
TOTAL	689	246	341

Contributions to foundations and non-profit organisations

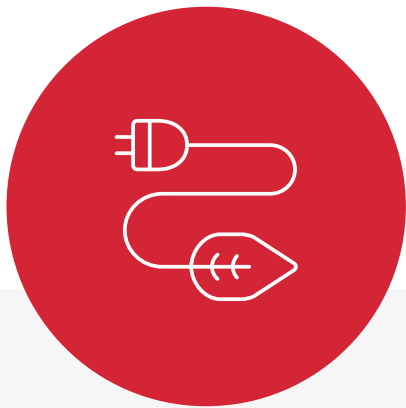
ACCIONA Energía complies with the ACCIONA Group’s internal regulations on Donations and Sponsorship. The aim of this standard is to establish a framework of action that allows the group to ensure that donations and sponsorship to charity or non-profit organisations are not a front for illegal payments to civil servants or other people, which would be an infringement of the company’s Anti-corruption Regulations. Any contribution of this type made by ACCIONA Energía should not give rise to any doubt whatsoever as to its appropriateness and, of course, it should not involve the infringement of any applicable law. These rules must be complied with by all the companies and employees of the group, and also by any third parties acting on their behalf. Similarly, ACCIONA Energía makes no donations to any political party or candidate nor any foundation that could be considered as political contributions in the terms established in the Code of Conduct.

Contributions to foundations and non-profit organisations are made with suitable analysis of the receiving institutions, and also their reputation and financial transparency.

In 2022, ACCIONA Energía contributed **€1,055,809** to associations or organisations for promoting sustainability and associations in the sector, amongst others.

→ CONTRIBUTIONS TO ASSOCIATIONS FOR THE PROMOTION OF SUSTAINABILITY AND IN THE SECTOR

ORGANISATIONS	CONTRIBUTION	INSTITUTIONS RECEIVING THE MAIN CONTRIBUTIONS (IN ORDER)
Sector associations	€ 891,019	American Clean Power Association, Wind Europe, Global Wind Energy Council, Asociación Empresarial Eólica (Spain), Canadian Renewable Energy Association (CanREA).
Institutions for the technical development of ACCIONA Energía	€ 154,265	International Emissions Trading Association (IETA), Land and Liberty Coalition, Clean Grid Alliance, European Australia Business Council, Advance Energy Economy
Institutions for promoting sustainability and global dialogue	€ 10,525	Global Compact and Acción Empresas
TOTAL	€ 1,055,809	



THE MAIN AREA TO WHICH CONTRIBUTIONS WERE MADE

Decarbonisation of the economy and clean energy

ACCIONA Energía is focused on actively pursuing the implementation of the Paris Agreement and its decarbonisation commitments across all the geographic regions in which it operates. To this end, it is actively involved in training and communication, either directly or through collective study groups or trade associations, in an effort to implement effective measures to decarbonise the economy.

At global and multilateral level, it mainly channels its commitment through global institutions or associations, contributing in issues mainly related to the promotion of renewable hydrogen, development of the offshore wind farms in Spain, hybridisation of renewable energy technologies, simplification of the formalities for renewable energy projects, including distributed generation and self-consumption, amongst other issues.

In 2022, a total of **€927,621** was invested in this area.

Due diligence of third parties

This procedure is carried out through the PROCUR-e web site and Dow Jones Risk Center (DJRC) site for partners, intermediaries and commercial agents acting on behalf of ACCIONA Energía. In addition, the company has three documents that describe how to perform due diligence: the Corporate Procurement Standard, the Corporate Procedure for the Approval and Evaluation of Suppliers, and the Corporate Standard for Selecting Partners and Hiring Business Consultants.

The DJRC makes it possible to obtain the necessary information on the identity of a third party, who manages and directs the company, any possible links these individuals may have with public officials or any potential litigation in relation to corruption, money laundering, fraud or involvement with tax havens, and inclusion on sanctions lists, amongst others. In 2022, 104 third parties were registered in this tool.

TAX INFORMATION

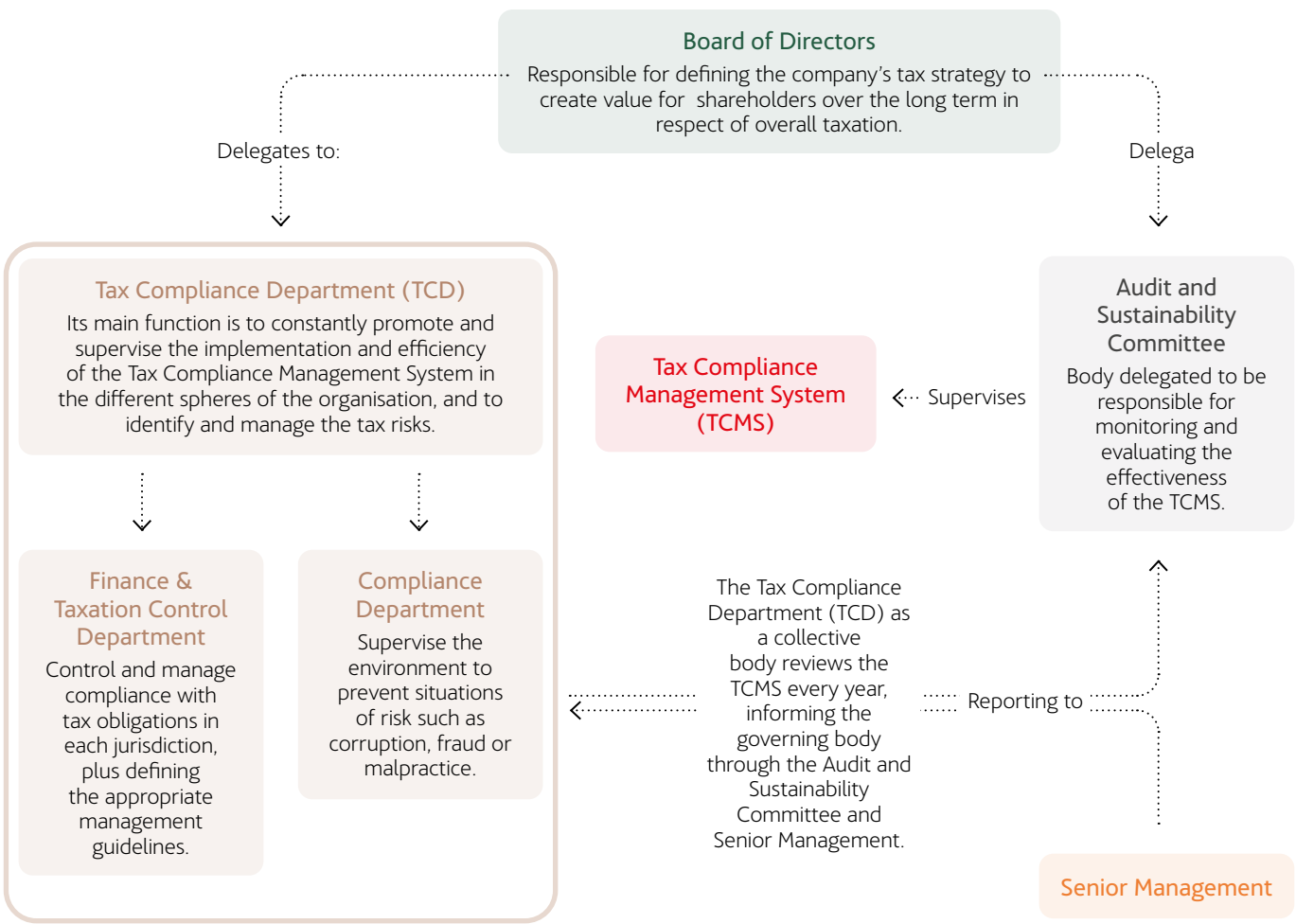
Tax policy

ACCIONA Energía believes that tax systems play a fundamental role in ensuring progress and social wellbeing in any given country, and also serve to maintain macroeconomic stability. The global reach of the company's operations provides an opportunity to contribute to the development of public services and combat inequality in societies around the world.

The company's commitment to responsible taxation is reflected in its Tax Policy, which sets out the group's strategy, and was adapted to successfully meet UNE 19602 certification standards in 2022.

The Tax Policy is based on the principles of compliance with the law and its reasonable interpretation, transparency, prevention and reduction of tax risks, coordination with tax authorities, with the aim of contributing to the countries and territories in which ACCIONA Energía operates.

→ TAX COMPLIANCE MANAGEMENT SYSTEM (TCMS)

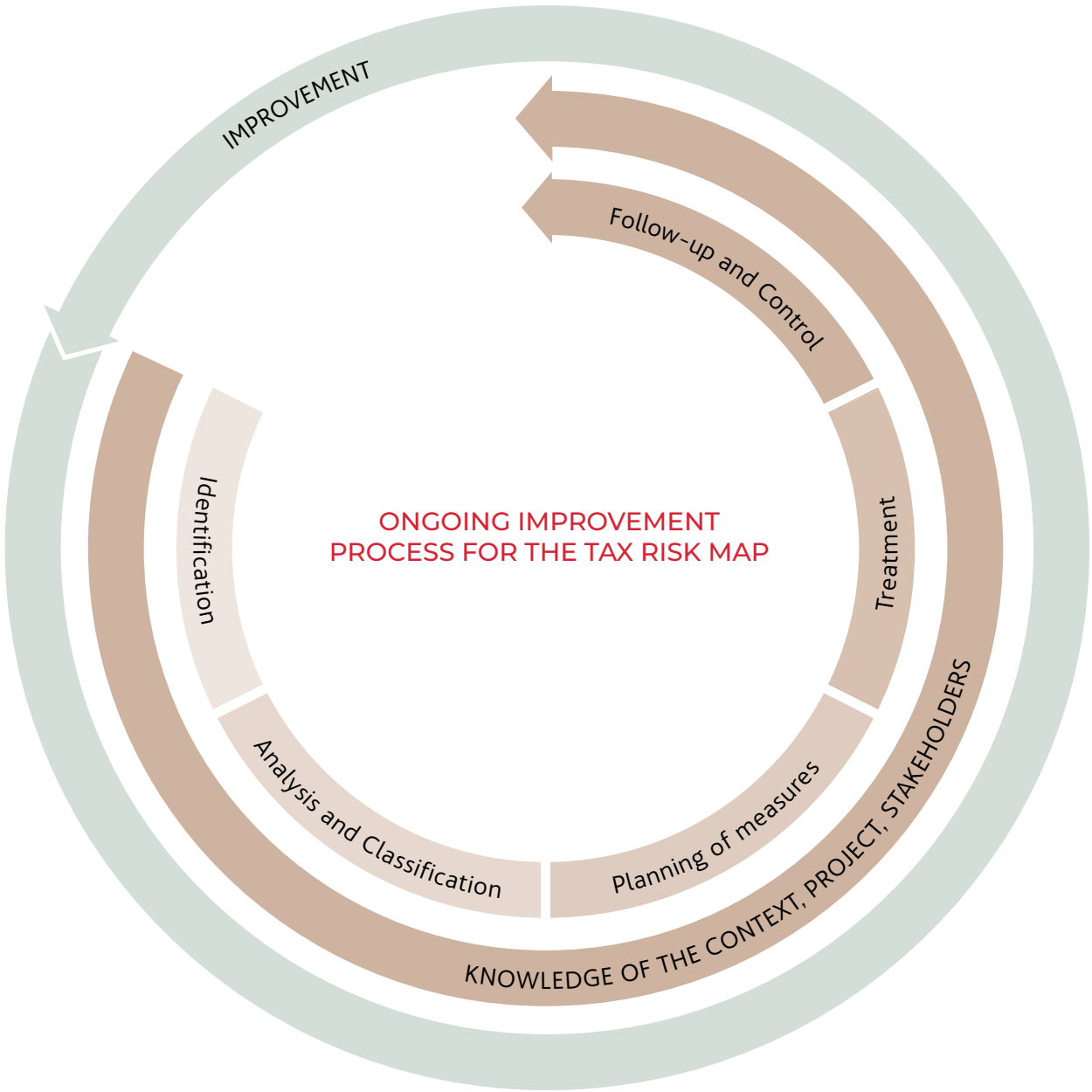


Detection and assessment of risks and opportunities

Conscious of the context of the organisation and the stakeholders identified, the ACCIONA Group has developed a methodology to identify and assess residual and inherent risks pertaining to tax risk. Tax risks are incorporated into ACCIONA Energía's Risk Map, using the methodology and mitigation plans applied to the rest of the company's risks.

Changes in national tax policies resulting from an increasingly rapid pace of political change in the countries in which ACCIONA Energía operates is a risk that the company addresses through continuous improvement of its Risk Map.

Process for the continuous improvement of the Tax Risk Map:



1  
Letter from  
the Chairman

2  
Only in  
renewables

3  
Sustainability  
and materiality  
governance

4  
People centric

5  
Planet  
positive

6  
Exponential  
leadership

7  
Integrate  
to transform

8  
Impact  
per region

9  
Appendices



Transfer pricing

Amounts paid between ACCIONA Energía and its investees and related companies are calculated on the basis of the direct and indirect costs of the support services, applying a market margin.

In accordance with OECD Guidelines, the arm’s length principle is applied when assessing and quantifying the market value of the various activities carried out by ACCIONA Energía. This principle is the internationally accepted standard for assessing the appropriateness of related-party transactions, whose conditions and prices must be the same as those that would apply to independent third parties carrying out the same or comparable transactions in similar circumstances. Comparability, reliability and ranking are taken into account, in addition to the results.

Dispute and litigation management

ACCIONA, the parent company of ACCIONA Energía, submits an Annual Tax Transparency Report to the Spanish Tax Agency (AEAT) every year, following its adherence to the Code of Good Tax Practices in 2011. In relation to its tax and fiscal transparency obligations, the company also delivers a Country-by-Country Report to the Spanish Tax Agency every year.

It also submits a voluntary Tax Transparency Report to the ATO (Australian Taxation Office) every year since 2018. All these reports serve to prevent any new disputes that may arise in any given year.

Tax-related disputes are included in the “Years subject to tax audits” section of the Annual Financial Statements.

The Ethics Channel can also be used to confidentially report any irregular conduct in tax matters as they are contrary to the Code of Conduct. The mailbox is open to the company’s employees, suppliers and contractors.

Country-by-country information

The following table includes information on all the tax jurisdictions in which the entities included in ACCIONA Energía’s Consolidated Financial Statements are resident for tax purposes.

TAX INFORMATION COUNTRY BY COUNTRY (CBC)

TAX JURISDICTION	TOTAL SALES (€M)	EBT (€M)	CORPORATE INCOME TAX ACCRUED (€M)	CORPORATE INCOME TAX PAID ON A CASH BASIS (€M)	EMPLOYEES AT THE CLOSE OF 2022	GRANTS (€M)	EFFECTIVE CT RATE (EXPENSE)	EFFECTIVE CT RATE (PAYMENT)
Spain	3,198	1,218	301	17.8	1,276	0	24.69 %	1.46 %
Mexico	230	54	9	20.4	264	0	17.33 %	37.59 %
Italy	66	38	24	21.3	17	0	63.68 %	55.83 %
South Africa	57	10	6	3.9	61	0	57.01 %	39.99 %
Australia	73	-8	2	0	153	0	-20.66 %	0.00 %
Portugal	222	-21	-5	2.7	24	0	22.46 %	-12.95 %
Ukraine	6	-50	-9	0.3	10	0	17.37 %	-0.52 %
United States	103	-80	-60	1.2	214	0	75.71 %	-1.44 %
Chile	262	-99	-11	0.9	175	0	10.80 %	-0.86 %
Others	134	-5	5	6.2	160	0	N/A	N/A
TOTAL	4,351	1,057	262	74.6	2,354	0	24.82 %	7.06 %

The complete list of ACCIONA Energía companies, and also their main activities, is published annually in appendices I, II and III of the Consolidated Financial Statements.

Furthermore, the company’s cash flow and tax contribution is published in the Summarised Report. Notes on the “Reconciliation of the accounting profit to the taxable profit”, “Taxes recognised in equity”, “Deferred taxes” and “Reporting Obligations” are published in the Financial Statements.

The Earnings Before Taxes (EBT) is the consolidated figure after allocating corporate analytical costs.

Explanatory notes on the differences between the effective tax rates and the nominal tax rates:

- Reversal of non-deductible expenses (non-taxable income).
- Tax losses in the year.
- Application of unrecorded tax credits
- Allocation of consolidation vs local accounts (Corporation Tax payments).
- Tax rate for Corporation Tax higher than in Spain.
- Tax rate for Corporation Tax lower than in Spain.
- Non-capitalisation (recording) of tax credits
- Capitalisation (recording) of tax credits (EBT)
- Non-deductible expenses and adjustment for inflation.
- Application of tax credits.
- Deferral for accelerated depreciation / unrestricted depreciation.
- Non-application of payments made by companies valued by the PPE method.
- Non-application of the tax consolidation method.

At 31 December 2022, the amount of capital grants and operating grants received by the Company amounted to €1.6 and €0 million, respectively.

None of the jurisdictions ACCIONA Energía operates in is considered a tax haven under Spanish legislation in Royal Decree 1080/1991, amended by the provisions of Royal Decree 116/2003.

Tax-related content presented in the Statement of Non-Financial Information is verified in accordance with the ISAE 3000 standard by an independent auditor, as is the rest of the report.

THE AMOUNT OF CAPITAL GRANTS AND  
OPERATING GRANTS RECEIVED BY THE  
COMPANY AMOUNTED TO €1.6 AND €0  
MILLION, RESPECTIVELY.

Relationship with the auditor

The item “Remuneration and other benefits” of the Consolidated Annual Accounts contains the information on the fees in relation to accounts auditing services and other services provided by the auditor of the company’s consolidated annual accounts, KPMG Auditores, S.L., and by companies belonging to the KPMG group, in addition to fees for work invoiced by the annual accounts auditors of the companies included in the consolidation and by the entities linked to them through control, joint ownership or management.

The Audit and Sustainability Committee Report on the independence of the external auditor is prepared annually. In this report, the Audit and Sustainability Committee of the Board of Directors delivers an opinion on the independence of the external auditor for each financial year in relation to ACCIONA Energía and its subsidiaries, and in accordance with applicable legislation on the independence of the Accounts Auditor, specifically Law 22/2015 on Account Auditing, and Regulation 537/2014 of the European Union.

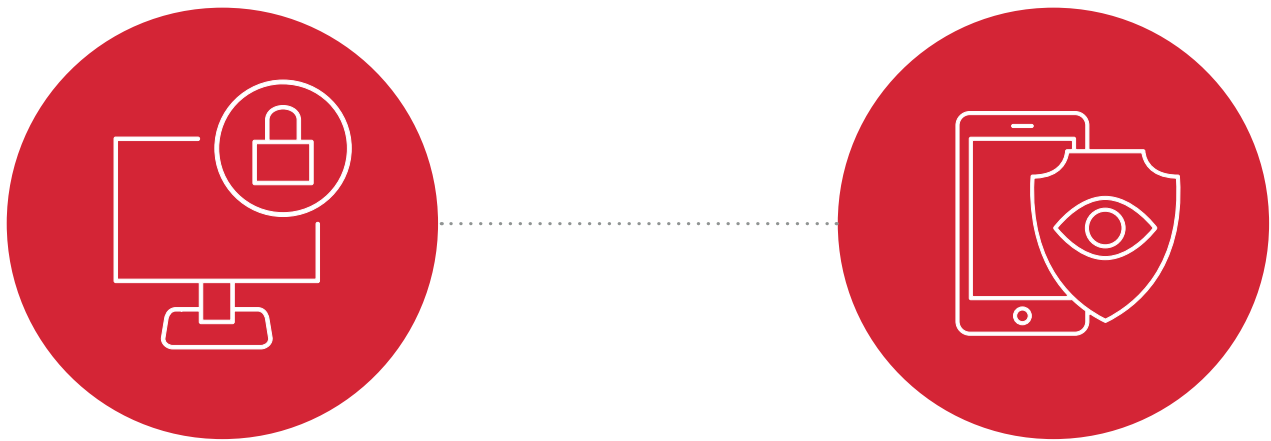
CYBERSECURITY

→ CYBERSECURITY

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Informative	<ul style="list-style-type: none"><li>• Loss of revenue due to security breaches</li><li>• Increase in operating costs</li></ul>	<ul style="list-style-type: none"><li>• Decrease in operating costs</li><li>• Positioning the company in relation to future regulatory burden</li></ul>

Cybersecurity has always been a never-ending race but the pace of change is accelerating. A World Economic Forum 2023 study highlights cybersecurity failures as one of the most significant threats in the short (0 to 2 years) and medium term (2 to 5 years).

ACCIONA, as the parent company of ACCIONA Energía, has an Information Security Steering Committee, which is composed of the Chief Financial and Sustainability Officer, the Corporate Security Director, the Director of Technology and Processes, the Director of Human Resources, the Chief Financial and Sustainability Officer of ACCIONA Energía, the Director of Corporate Resources of Acciona Infrastructures, and the Group’s Director of Cybersecurity. This Committee is responsible for promoting and supporting the establishment of technical, organisational 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 organisational areas of ACCIONA.



ACCIONA Energía has a specific Cybersecurity committee, coordinated with the different operational Cybersecurity Committees already existing, in which the main cybersecurity managers of the different areas, functions, companies or territories that may be determined in each case participate.

The cybersecurity framework of the parent company ACCIONA is aligned with various international standards, such as NIST CSF and ISO 27001, and defines all the control objectives and controls in the area of cybersecurity. As part of this instrument, the company has a cybersecurity policy and an employee awareness and training plan, in addition to procedures and mechanisms for any employee to be able to report a security incident or suspected security incident. At the same time, it holds the ISO 27001 certification for the information security management system associated with the security services provided internally from the central offices.

The group has also established processes to prevent interruptions and cyber attacks on the computer system.

2022 saw further progress in incident detection, response capacity and the evolution of the group’s cybersecurity operations centre. No cybersecurity incidents impacted on the Group’s operations in 2022.

In 2023, the company plans to increase staff awareness, to provide additional training, and to continue adapting our cybersecurity model in accordance with changes and developments in regulations and customer requirements.

## Sustainable transformative innovation

→ INNOVATION IN THE INDUSTRY

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Increased cost of raw materials</li><li>• Loss of competitive advantage due to lack of innovative solutions</li></ul>	<ul style="list-style-type: none"><li>• Decrease in operating costs due to process improvement</li><li>• Increased revenues due to sectoral advances</li></ul>

Innovation, as a core pillar of ACCIONA Energía, enables the company to lead the renewable energy sector, turning sustainability challenges into opportunities for creating more efficient and productive operational solutions with a positive impact on each project.

ACCIONA Energía’s innovation system covers all levels of technological maturity and implements an open, disruptive and digital innovation model with its innovation centres. This allows the development of the capabilities, products and services required to design a sustainable reality that is freely accessible and respectful of the communities and environments in which the company works.

COMMITMENT TO INNOVATION

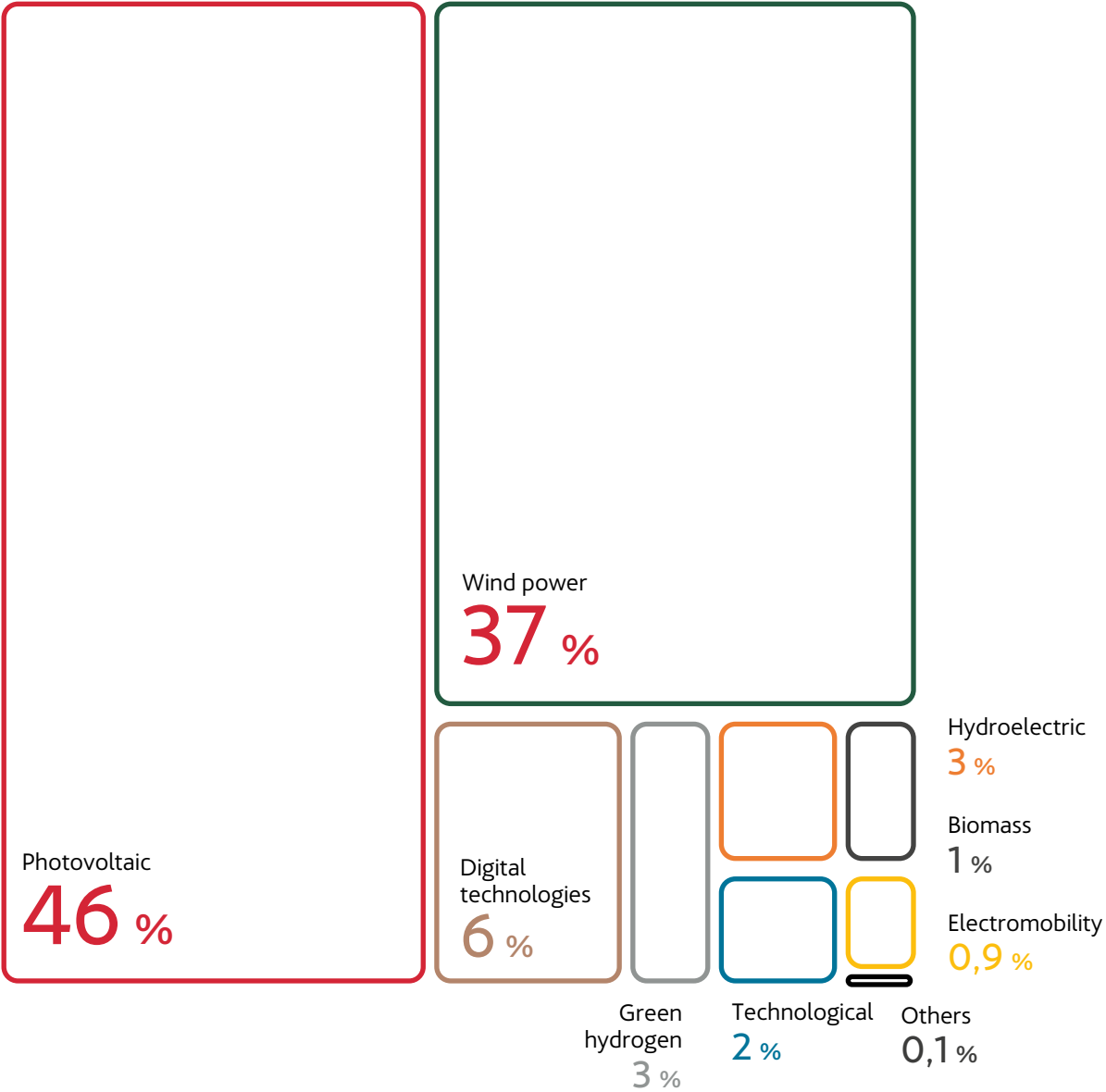
ACCIONA Energía’s strategy, put into effect through the Sustainability Master Plan provides an impetus to:

- 01 **Regenerative innovation**, with particular emphasis on the promotion of social and environmental components.
- 02 **Internal open innovation**, establishing alliances with new social economy partners that are capable of providing answers to the regenerative challenge.
- 03 Strengthening the development of processes and tools that drive **digital transformation**, with particular focus on efficiency and resource management.

ACCIONA Energía innovation figure

In 2022, ACCIONA Energía reported spending €103.5 million on innovation, 13% more than the previous year. The portfolio of projects totalled 70, 41 of which were research projects and 29 innovation projects. The company has carried out one project outside of Spain worth €6.6 million, representing 6% of the total innovation figure reported.

→ INNOVATION FIGURE PER TECHNOLOGY (%)



\* Others: Storage (0,1), Demand management (0,02) y Circular economy (0,004).

→ INNOVATION FIGURE PER COUNTRY (%)



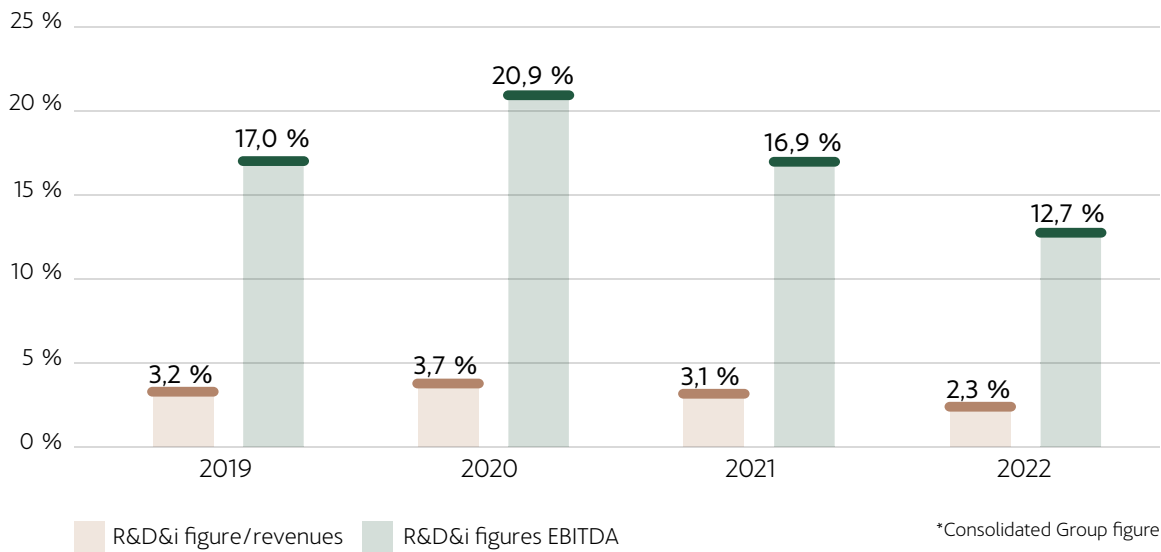
Governance	93	Sustainable transformative innovation	109	Authenticity	114	Transparency	120	Supply chain	121
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→ EVOLUTION OF THE ACCIONA ENERGÍA INNOVATION FIGURE

		2019	2020	2021	2022
R&D&i figures (million euros)		230.4	237.0	250.2	262.8*
EU Industrial R&D Investment Scoreboard	European Union ranking	156	141	121	134**
	Ranking in Spain	6	6	7	7

\* Consolidated Group figure, ACCIONA Energía accounts for 39.4 %. \*\* Under review

→ EVOLUTION OF ACCIONA INNOVATION INTENSITY (%)



The innovation intensity ratio, obtained by dividing sales by innovation spending, is 2.3% in 2022.

STRATEGIC LINES OF INNOVATION

ACCIONA Energía considers it a strategic priority to remain at the forefront of technology in its sectors of activity, seeking to accelerate the changes necessary for sustainable development while simultaneously generating value for the company. Establishing specific objectives and action plans has allowed ACCIONA Energía to successfully work towards fulfilling the company’s innovation strategy in 2022.

→ INNOVATION IN ENERGY

INNOVATION TO TRANSFORM	ACCIONA ENERGÍA PROJECTS
<b>Extending the useful life of assets.</b> Use of predictive technology based on physical models and data models to lengthen the useful life of power generation assets.	The Biomassbrain project has developed a traceability tool for all the variables that make up the process of producing electricity from biomass, from raw materials at source to combustion control and plant operation.
<b>Maximisation of production.</b> Technological solutions are created for reducing the LCOE (levelised cost of energy) and increasing the electricity produced, without affecting the safety and useful life of the assets.	Based on the results obtained in the Maxpower project, work has begun on scaling up the solutions developed for the wind turbine fleet in Spain.
<b>Advanced photovoltaic technology.</b> Implementation of new solar photovoltaic technology in both the construction phases and O&M.	Work continued on monitoring the environmental and production performance of the floating photovoltaic plant at the Sierra Brava reservoir (Spain), and work has begun on the development of new technological solutions for the agrovoltaic research plant project on the canal. Further work is being carried out to implement new technologies at the El Romero Hub (Chile). The project will evaluate the extent to which production is higher than conventional technologies and its potential for use in future commercial plants.
<b>Innovation to ESG.</b> Design and implementation of solutions to minimise ESG risks, and to raise the standards in these aspects for all company developments.	The Avisave project for the protection of birdlife in wind farms has expanded to include the Chisave project, which focuses on the protection of bats.
<b>Storage and hybridisation.</b> Development and validation of technology that makes it possible to integrate and manage storage systems in renewable energy production plants to substantially increase the inclusion of renewable energy in the grid, and also to take an active part in supplying energy to the auxiliary grid services.	In 2022 the hybridisation project for lithium-ion batteries with ultracapacitors was completed.
<b>Renewable hydrogen.</b> Complete development of the green hydrogen ecosystem as an energy vector for the decarbonisation of the industry and of society.	Work has continued on the development of the Power to Green H2 Mallorca project, and new decarbonisation projects based on green H2 have been proposed.
<b>Vehicle to grid.</b> Technological solutions for the new electromobility and energy management	In 2022 the project V2G Balearic Islands was put into operation.
<b>Offshore wind energy.</b> Development of new pilot projects and prototypes for demonstrating offshore wind energy technology.	ACCIONA Energía is involved in the development of two of the three floating offshore wind turbine demonstration projects selected by CINEA (European Commission).
<b>Waste to industry.</b> Development of circular economy solutions in all aspects related to energy production.	Research has been conducted on the recovery of biomass slag with two demonstrations of nonintensive roadways, one in the Celada wind farm and the other in the grounds of the Miajadas Biomass plant, using different percentages of biomass slag. Pilot pultruded photovoltaic beam structures are currently undergoing tests to assess performance. Further progress has been made in identifying ways of recovering slag for use on surfaces to increase albedo in photovoltaic plants.

CROSS-CUTTING INNOVATION

<b>Advanced technologies in operation and maintenance (O&amp;M).</b> Advanced technologies are developed for optimising the O&M of wind, solar and biomass assets.
<b>New business models in digital innovation.</b> New energy models based on digital solutions that guarantee the renewable energy source, and also data traceability, governance and administration.



V2G BALEARIC ISLANDS

ACCIONA Energía has launched the Vehicle to Grid (V2G) Balearic Islands project, the first bidirectional charging network for electric vehicles in Spain, which will make it possible to recover the electricity stored in vehicle batteries for self-consumption or injection back into the grid. The entire ecosystem is 100% renewable.

The Balearic Islands V2G pilot project involves the participation of eight Balearic Island companies and the installation of 16 recharging points.

ACCIONA Energía has provided the participating companies with eight electric cars with V2G technology, which can also be used as storage systems for self-consumption or injection back into the grid. The companies participating in the first phase are Pavimentos Lloseta, Cárnicas Súñer, Droperba, Asociación Estel de Llevant, Hotel La Reserva Rotana and Hermanas Buades.

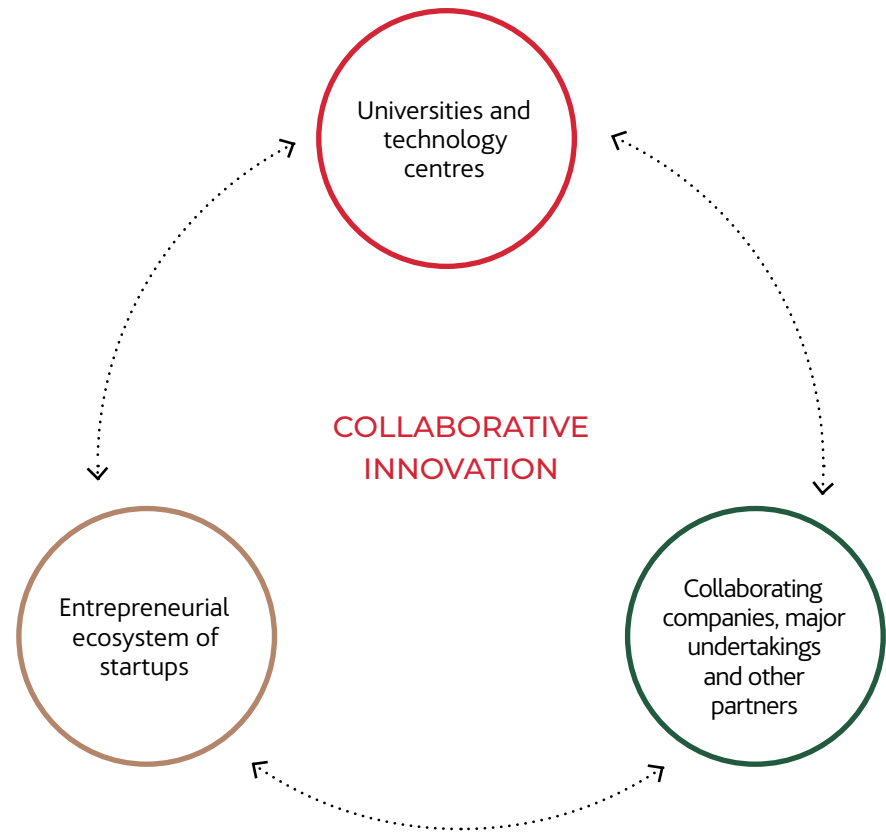
Two more companies will join the imminent second phase of the project, which will allow the extension of the V2G network to the islands of Menorca and Ibiza.

This innovation pilot project is the first implementation of V2G technology on an industrial scale in Spain. The scale of the project is of sufficient size to gauge patterns of behaviour and use. The conclusions drawn will allow further advances in the technological and economic maturity of this particular energy service model.

Interaction between the vehicles and the recharging network is fully digitalised to enable operation and supervision of the delivery of electricity in both directions and to analyse the performance of the charging and injection processes. Building on this experience, ACCIONA Energía will monitor the main variables of V2G operations, and will test and validate applications such as complementary services to the grid, smoothing of peak demand, and other services associated with this technology.

APPROACH TO COLLABORATIVE INNOVATION

ACCIONA Energía’s innovation model attracts the best available talent among employees, start-ups and external partners.



In 2022, the company continued to promote the importance of innovation, to seek out new collaborative opportunities, and to encourage dialogue with stakeholders. ACCIONA Energía promotes a culture of innovation with several of these groups through a variety of different channels, with input from the Innovation Department according to the issues addressed.



ACCIONA Energía collaborates with the major universities in the countries where it is present. The collaboration centres on renewable wind and solar technology. Of particular note in 2022 was the creation of the Green H2 Chair with the Polytechnic University of Madrid, and the development of the framework for the Sin Límites Programme with the Pontificia Universidad Católica de Chile, on water resources and the optimisation of photovoltaic plants.

This year also saw the launch of open collaboration processes with the Autonomous University of Madrid, the Polytechnic University of Valencia, and the Jaume I University.

Collaboration programmes and projects are established at the crossroads between the areas of technology interest and the areas of technology competition and developments of those partners. The project for collaboration with Red Eléctrica de España (the Spanish grid operator) and the HESStec startup development continues on a project for collaborating in the development and experimentation of new advanced features for integration in the grid of hybrid storage systems between batteries and ultra-capacitors.

ACCIONA ENERGÍA  
COLLABORATES  
WITH UNIVERSITIES,  
RESEARCH  
CENTRES AND  
ENTREPRENEURIAL  
ECOSYSTEMS.

Furthermore, as a result of this collaboration, a new project has been proposed to advance development of new hybrid, synchronous, grid-forming energy storage that will allow for grid services with high stability. This project will receive institutional funding from Spain's Recovery, Transformation and Resilience Plan.

Noteworthy hydrogen projects include the alliance with partners like Enagás in the development of the Power to Green H2 Mallorca project, and with the Hydrogen Foundation of Aragon.

MAIN INITIATIVES FOR DIALOGUE

Among the many and varied dialogue activities carried out in 2022 the following events are worthy of mention:

- 1 Innovation 2050: technologies for speeding up energy transition.
- 2 2022 Renewables Congress.  
The digital revolution: artificial intelligence, tokens and greenchain.
- 3 2022 MIT Energy Conference. Accelerating the Clean Energy Transition.
- 4 RENMAD H2 Chile 2022.
- 5 Retina ECO 2022 Awards.
- 6 Connecting Green Hydrogen Europe 2022.
- 7 World Hydrogen Congress 2022.
- 8 Webinar major boost for floating photovoltaics in Spain.
- 9 WindEurope Annual Event 2022, Bilbao.
- 10 Hangar 360: First International Encounter for Innovation and Business Venture (Santiago de Chile).

OPEN INNOVATION

The I'MNOVATION #Start-ups programme saw more than 200 start-ups presenting their proposals for the seven challenges launched from Acciona Energía. The programme selected proposals, pilot projects and concept tests from Ingelectus, Synvertec, Bytek, Smarthelio, Impacte, Sinai and Multiverse. Among the topics addressed were the degradation of photovoltaic plants, the development of a platform for monitoring and management of the decarbonisation plan, and the development of a platform for collective self-consumption facilities.

Authenticity

This area of action arises with the aim of demonstrating that ACCIONA Energía's commitment is genuine and that all members of the group are familiar with it and share it. The company's values are recognisable and present in its activities and our employees recognise that management is made up of reliable and trustworthy people, with company values and commitment to our mission.

CUSTOMERS

The prime objective of ACCIONA Energía is satisfying the needs and expectations of customers and users. Which is why the company's [Quality Policy](#) includes ensuring the health and safety of customers and users among its principles. With regard to quality management, the company is ISO 9001 certified in all customer activities. Furthermore each of the safety management systems implanted in the company has a policy that sets out the principles and commitments of application, and is approved by senior management and at the disposal of all interested parties.

To provide a more personalised service to customers, each department directs its strategy and leadership to the specific context of its activity, in strict accordance with Acciona Energía's Quality Policy. To ensure greater transparency, all these businesses are audited internally and externally every year.

Long term agreements (PPAs)

In 2022 there was a rise in the number of green energy purchase agreements on all markets. The quest for a decarbonised economy continues offering price stability, reliable supply and reduced carbon emissions.

IN 2022, ACCIONA ENERGÍA CONTINUED TO STRENGTHEN ITS RENEWABLE ENERGY SALES STRATEGY

34 New corporate (Power Purchase Agreements).

28 customers who wish to reduce their carbon footprint.

Spain 29 agreements 639 MW.

Australia 3 agreements 284 MW.

Portugal 2 agreements 28 MW.

Customer satisfaction

ACCIONA Energía manages the sales to the electricity market of energy from 100 % renewable sources produced in the plants belonging to the group. It also handles the sale of other separate renewable energy products which benefit from the technical abilities and experience of the group, adapted to the customers' needs. ACCIONA Green Developments has a long history of selling energy in Iberian markets.

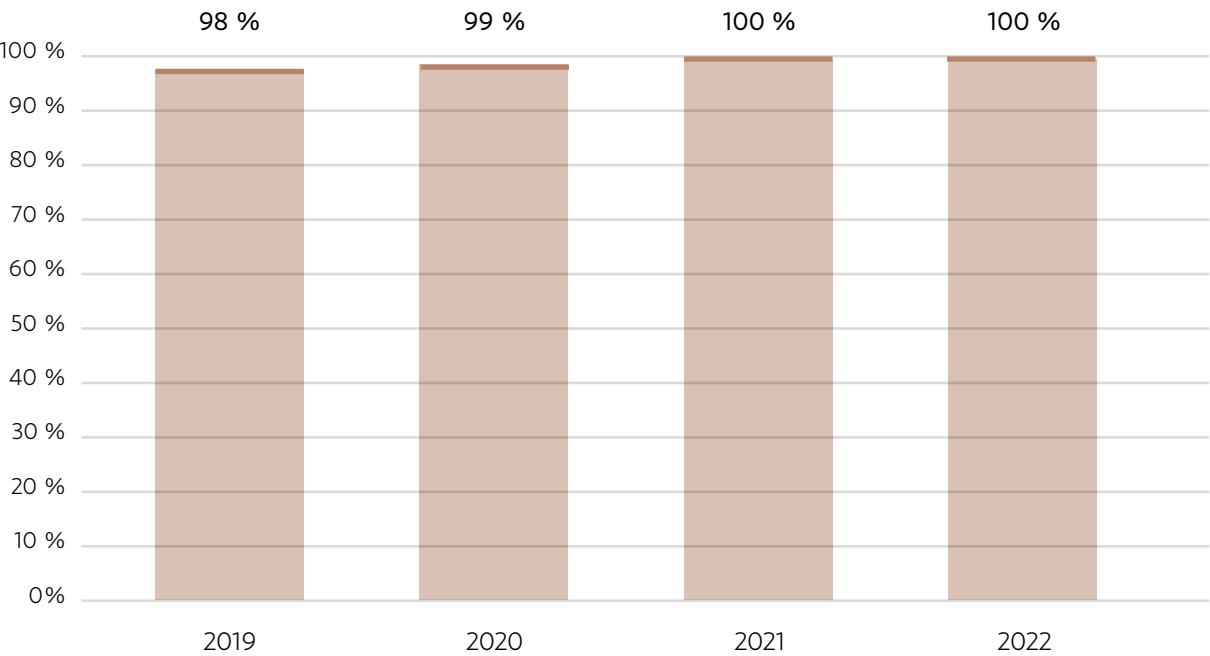
ACCIONA Green Developments also sells 100 % CNMC certified renewable energy [National Markets and Competition Commission] to customers and advises them on the most suitable form of contracting the supply for the most optimum consumption. Amongst the associated services, it is worth mentioning the downloading of invoices and 24/7 telephone attention, or the possibility of consulting the consumption record and prices forecast. The company has a CRM system that manages customer relationships and contributes to providing an optimum service and follow-up.

The most usual method of gathering information on satisfaction and/or experience with ACCIONA Energía's products, services and projects are surveys. During 2021 a total of 1,850 consultations were made, with 209 responses received.

ACCIONA Energía's levels regarding the possibility of a customer contracting its services again remain above 85 % for all businesses, except for recent activity in the Iberia Marketing Company for SMEs, where it stood at 69 %. As it was recently launched, ACCIONA Recarga does not yet have information available.

ACCIONA Energía receives constant high levels of satisfaction over time.

→ EVOLUTION OF CUSTOMER SATISFACTION (%)



ACCIONA RECARGA

ACCIONA Energía seeks to generate an ecosystem that facilitates electric mobility on the Iberian Peninsula. 2022 saw the signing of agreements, and several operational electric vehicle charging points were installed in various regions of Spain.

The number of users of ACCIONA RECARGA's own recharging network registered on the Platform and App increased by 14,733 users in 2022, bringing the total number of registered users to 26,579. The average satisfaction rate for the 6,425 recharges carried out in the year reached 76%.

**Mahou centres**  
100 electric charging points were installed in various MAHOU company centres. These installations are managed through ACCIONA Recarga's own platform and application.

The targets for improvement set for 2022 have been achieved in full in all business lines.

→ PREVIEW OF THE 2022 TARGETS FOR IMPROVEMENT

BUSINESS LINE	TARGETS FOR IMPROVEMENT
Solar farms	<ul style="list-style-type: none"><li>Creation of information sheets on topics of interest to customers.</li><li>New training for internal staff to improve customer service.</li></ul>
Marketing Company for Chile	<ul style="list-style-type: none"><li>Improvements were made to the Greenchain platform with a view to providing up-to-date information and access to all customers.</li><li>New annual customer meeting schedule in addition to the existing regular meetings.</li></ul>
Marketing company for SMEs in Spain	<ul style="list-style-type: none"><li>Launch of a new Customer Care service.</li><li>Development of system for notifying the availability of invoices.</li></ul>
Marketing company for Portugal	<ul style="list-style-type: none"><li>Improved transparency and quality of information reported to customers.</li><li>Reduction in response times to customer complaints.</li></ul>
Marketing Company for Spain	<ul style="list-style-type: none"><li>Improved customer retention rate and new Customer Relationship Management system.</li></ul>
ACCIONA ESCO	<ul style="list-style-type: none"><li>Development of a proprietary platform, OLYMPO, for agile management of energy services provided to customers.</li></ul>
ACCIONA Recarga	<ul style="list-style-type: none"><li>Development of platform and mobile app with functionalities that adapt to customer and market requirements.</li></ul>
Eqinov	<ul style="list-style-type: none"><li>Improvement of the website used by potential customers.</li><li>Meeting customer energy efficiency needs through a range of services offered (cross-selling increased by 4%).</li></ul>
Energy Management for Mexico	<ul style="list-style-type: none"><li>Development of a customer website platform for after-sales service.</li><li>Improved customer loyalty through field visits to power generation facilities.</li></ul>

Complaints and claims handling

A complaint and claim handling system aligned with communication channels to ensure quick and easy processing by the customer. Consequently, there are different mechanisms for greater specialisation in each line of business.

In businesses with a large number of customers (e.g., the Spanish marketing company), open and diversified communication mechanisms include telephone customer service and contact via social networks. In business areas where the service is more personalised (ACCIONA ESCO, Eqinov, and energy management in Chile and Mexico), direct attention from project management staff facilitates identification and response to complaints and claims.

In the case of ACCIONA Recarga, complaints and claims received through formal channels are handled promptly and as a matter of priority, analysing the specific case and responding to the customer on a caseby- case basis.

Different procedures are also adopted for each country. For example, in Mexico, requests are monitored by email and response time, although work is under way to automate and centralise the process via the website. In Chile, customer requests are processed in order of arrival and according to priority and are dealt with according to the availability of management staff. This mechanism would appear to be working well, with customer ratings of over 70%.

There were 1,192 B2B complaints in 2022, a large increase on the previous year, but proportional to the increase in SME customers and regulatory changes to the terms of energy invoices. B2C complaints remain in line with the previous year, with a total of 32, remaining stable with respect to 2021 and continuing the downward trend in recent years.

→ EVOLUTION OF THE CLAIMS

	2020	2021	2022
BUSINESS TO BUSINESS (B2B)			
No. of claims	341	160	1.192
B2B claims successfully closed (%)	97 %	90 %	84 %
BUSINESS TO CONSUMER (B2C)			
No. of claims	41	31	32
B2C claims successfully closed (%)	100 %	100 %	100 %

The Solar business line has settled claims within an average of 12 hours, reducing last year’s figure by 50%.

Differentiating per country, in Spain and Portugal the process took 11 and 12 days respectively, in France (EQINOV) 16 days and in Mexico 3 days. And in ACCIONA Recarga the average was 1 month.

Product health and safety

One of the basic principles of the [Quality Policy](#) is to ensure the health and safety of customers and users. Furthermore each of the safety management systems implanted in the company has a policy that sets out the principles and commitments of application, and is approved by senior management and at the disposal of all interested parties.

During 2022, no reports on non-compliance were received regarding customer health and safety.

Certified management systems

100 % of the marketing and sale of renewable energy has guarantee of origin accredited by the Spanish National Energy Commission (CNE) and 100 % of the certifiable MW installed are certified under ISO 9001 and ISO 14001. Similarly, 100 % of the energy services activity is certified under ISO 50001.

In 2022, the activities of Energía Services (ACCIONA ESCO) were integrated into ACCIONA Energía’s multisite certification model for ISO 9001 and 14001. This year, the Research, Development and Innovation (RDI) Management System at Acciona Generación Renovable, S.A. obtained certification with the new version of the UNE 166002:2021 standard.

The two companies incorporated into ACCIONA Energía in 2022, EQINOV (energy services in France) and ACCIONA Recarga (formerly Cargacoches, S.L.) were already ISO 9001 certified, and remain so.

Audits

Internal and external audits by both customers and certification authorities constitute one of the main tools for ACCIONA Energía for identifying opportunities for improvement.

In 2022, the company performed a total of 127 internal audits. Regarding external audits, 4 countries are audited for ISO 9001, ISO 14001 and ISO 45001 certification as a representative sample of the whole of ACCIONA Energía. This year saw audits carried out in Spain, USA, South Africa and Poland. In total, 21 external audits were conducted.

Dialogue with customers

Dialogue with customers was a priority for ACCIONA Energía throughout 2022, with several initiatives undertaken at various commercial points. Among the most noteworthy were:

- 01

Marketing Company for Chile

The Chilean marketing company introduced a new schedule of annual meetings with customers to discuss the evolution of their consumption and invoiced charges, and to review the impact of their renewable supply in terms of emissions reductions.
- 02

Energy Management for Mexico

The Mexican marketing company addressed regulatory issues and changes in the law with the authorities, as well as training programmes and explanations of electricity market concepts.
- 03

Marketing company for Portugal

The Portuguese marketing company continues to seek out long-term energy supply solutions, integrating Greenchain as a mechanism to ensure the green origin of the energy supplied.
- 04

Marketing company for SMEs in Spain

The Spanish marketing company for SMEs used personal communication channels such as social networks to deal with customers.
- 05

Equinov

EQINOV organised webinars and conventions/conferences with customers. It has also communicated through media such as newspapers to share experiences in the energy sector.

All B2B business lines provide customers with various means of communication, ranging from contact email boxes to service websites.

Product and service labelling

The energy sold by Green Energy has a certificate issued by the Spanish National Commission on Markets and Competition (CNMC in Spanish) which certifies the 100% renewable origin of the energy.

In 2022, there is no record of any court rulings related to non-compliance of regulations or voluntary codes relating to marketing communications or on non-compliance related to information and the labelling of products and services.

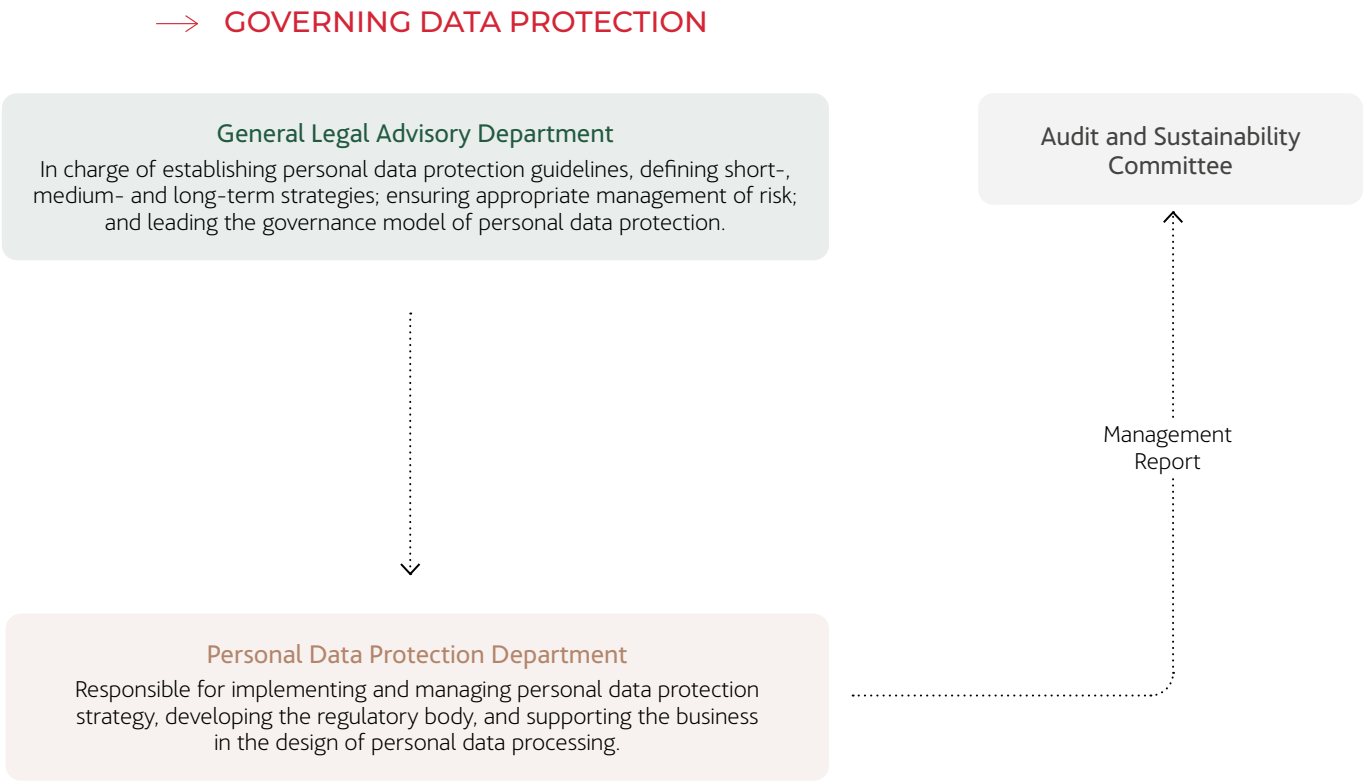
Personal Data Protection and Guarantee of Digital Rights

ACCIONA Energía is committed to the digitalisation and automation of processes to improve company productivity and customer and employee experience. In order to meet the challenges of becoming a datacentric organisation, the company prioritises the maintenance of a system that guarantees the security of personal data.

The importance of this issue is reflected in [ACCIONA Energía’s Personal Data Protection and Digital Rights Guarantee Policy](#). The internal regulations, which apply globally, establish that the company and its subsidiaries, and by extension, its entire value chain, are obliged to act in accordance with legally established principles and rights regarding the protection, processing and privacy of personal data.

ACCIONA also has a Personal Data Protection Department that spearheads the organisation’s commitment to the responsible use and protection of identifiable information of customers, consumers, employees and partners.

To guarantee adequate management of personal data protection, the following organisational structure has been established:



ACCIONA Energía provides mandatory data protection training for all its employees. To extend this culture to the supply chain, company suppliers must acknowledge the terms of a self-declaration document, which includes issues relating to personal data protection, as part of ACCIONA's control mechanisms.

No data protection breach was reported to the Supervisory Authority in 2020 and the company was not subject to any sanction in this regard.



Relations with the Public Administrations and regulatory bodies

ACCIONA Energía maintains a transparent and constant relationship with public administrations in every country in which it operates. The company considers public participation in the process of adopting any regulatory initiative to be important in order to ensure that the interests of everyone who will be affected by the measures to be adopted are seen to be duly weighed and reflected.

Likewise, the company advocates constant dialogue with regulatory authorities and is committed to full collaboration. As a result, ACCIONA Energía is actively involved in the development of those public policies that affect the areas and sectors in which it operates, contributing the experience of the private sector to the legislating bodies.

The company's position is always consistent with its commitment to environmental protection, support for renewable energies, respect for human rights, and sustainable use of resources.

THE COMPANY ADVOCATES CONSTANT DIALOGUE WITH REGULATORY AUTHORITIES AND IS COMMITTED TO FULL COLLABORATION IN THE DEVELOPMENT OF THOSE PUBLIC POLICIES THAT AFFECT IT SECTORS OF ACTIVITY.

Under the terms of its Code of Conduct, ACCIONA Energía makes no financial contributions for political purposes, or for obtaining any favourable treatment. Nor does the company use sponsorship or donations for those purposes.

Within the European Union, the parent company, ACCIONA, has been registered since 2013 in the EU<sup>13</sup> Transparency Register, where the interests it pursues, who defends them and the related budget are published in a transparent manner.

<sup>13</sup> <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=451019811573-55>

In 2022, it has contributed to numerous public hearing procedures and participated in the preparation of reports and position papers of various entities and associations, in support of the decarbonisation of the energy sector related to:

- Promoting renewable hydrogen.
- Development of marine wind power in Spain.
- Simplifying the formalities for renewable energy projects, including distributed generation and self-consumption. Proposals for eliminating regulatory barriers and making it possible to take advantage of its whole potential.
- Hybridisation of renewable energy technologies.
- Development and improvement of operating procedures to enable better integration of renewable energy into the power grid and define the proper way to operate the new resource flexibility and hybrid renewable plants.
- Extending the life and repowering of renewable projects.
- Process for access and connection of renewable plants.
- Promotion and regulatory development of new flexibility resources (storage, demand-side management, aggregation, electric vehicles) and new renewable generation technologies (floating and canal PV).
- Redesign of the electricity market and measures affecting the remuneration of renewables.
- Calls for grants to support renewable installations, self-consumption, storage and renewable hydrogen.
- Adaptation of Spanish and European regulations relating to electricity generation using biomass.

ACCIONA Energía participates in sectoral associations at regional and national level (for example, AEE and APPA), and also at European level (such as WindEurope and CLG Europe; Renewable Hydrogen Coalition and European Clean Hydrogen Alliance, European renewable hydrogen initiatives) and internationally (GWEC). The company participates actively with them and holds positions of responsibility on their management bodies.

Transparency



→ DIALOGUE AND SUSTAINABLE LEADERSHIP

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Important	<ul style="list-style-type: none"><li>• Loss of market share to fossil fuels</li><li>• Loss of manoeuvrability due to regulations.</li></ul>	<ul style="list-style-type: none"><li>• Increase in asset value due to increased sustainable dialogue.</li><li>• Improved positioning regarding regulatory burdens through participation in their development.</li><li>• Increased revenue</li></ul>

The fundamental pillar of “Exponential Leadership” contained in the 2025 Sustainability Master Plan establishes the objective of ensuring that ACCIONA Energía is perceived by its customers as one of the top five companies contributing most to the sustainable development of key markets. Constant participation in dialogue forums with stakeholders and the establishment of local alliances in the company’s main countries of operation are therefore of fundamental importance.

Accordingly, ACCIONA Energía has continued to participate as a member of the leading organisations promoting sustainability, such as CLG Europe, the WBCSD, the UNGC and The Climate Pledge. In 2022, ACCIONA Energía participated in 6 major international initiatives in sustainable development, climate change and ESG issues.

ACCIONA Energía at COP 27

The 27th session of the Conference of the Parties (COP 27) of the United Nations Framework Convention on Climate Change (UNFCCC) was held in November 2022 in Sharm El-Sheikh, Egypt. Among the topics discussed were the continuing international effort to mitigate climate change, adaptation to its consequences, and the financing mechanisms required to do so. There was also in-depth discussion on the fund for economic loss and damage, and the mechanisms of Article 6 of the Paris Agreement on carbon markets.

ACCIONA Energía’s CEO took part in the summit and had the opportunity to present ACCIONA Energía’s experience at the round table “Renewable hydrogen: innovation opportunities and how to make it real”.

The event focused on renewable hydrogen as a key component of global energy policy, which led to debate on public-private collaboration to ensure the development of the renewable hydrogen economy.

ACCIONA Energía was also present in the SDG 7 Pavilion, where discussions focused on renewable energies, the requirement for complying with the 2030 Agenda, and the development of a sustainable economy.

ACCIONA Energía’s CFSO participated in the COP27 Energy Day alongside SSE, National Grid and Hitachi Energy. The conference addressed the issues of technology, infrastructure, and equity in clean energy.

The Spanish Green Growth Group

ACCIONA Energía’s Director of Sustainability took part in the Spanish Green Growth Group’s round table event to consider and share views on the main sustainability proposals presented at COP27 and the need for further public-private collaboration.

International Chamber of Commerce (ICC)

ACCIONA Energía’s CEO took part in the ICC event, which reviewed the UK’s experience in decarbonising its energy sector, and also considered the progress made in reducing technology costs in areas such as offshore wind energy.

United Nations Global Compact (UNGC)

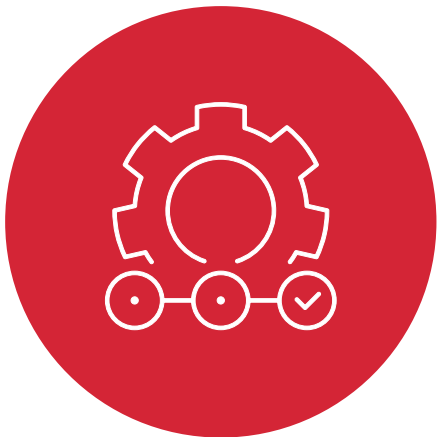
ACCIONA Energía, as part of the ACCIONA Group, has been a signatory of the United Nations Global Compact since 2005. It confirms its commitment to the Ten Principles of the Global Compact each year. The company regularly collaborates with the Spanish and Chilean Global Compact Networks and in 2021, also collaborated with the German network, participating in the Traceability in global supply and contracting chains programme.

At the same time, ACCIONA Energía’s chairman participated in the High-Level Meeting of Caring for Climate summit, this year’s edition of which focussed on achieving the goal of zero emissions. In his speech he also shared his vision for the results of the summit, as well as the challenges.

Supply Chain

→ SUPPLY CHAIN

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Significant	<ul style="list-style-type: none"><li>• Loss of bargaining power in the supply chain</li><li>• Decreased revenue</li></ul>	<ul style="list-style-type: none"><li>• Increased revenue by maintaining a stable and sustainable supply chain</li><li>• Reduction of raw material costs</li></ul>



ACCIONA Energía is committed to leading the development, knowledge and control of its supply chain, focusing particularly on social responsibility, ethics and transparency of the procurement process. Market requirements and regulations create the need for a traceability system throughout the supply chain.

RESPONSIBLE SUPPLY CHAIN MANAGEMENT

Ethics for suppliers and contractors

ACCIONA Energía considers communicating the company’s Ethical Principles to its supply chain to be a key aspect for consolidating a network of suppliers, contractors and collaborators in line with its corporate values. This communication takes place through various channels:

1. Prior to entering a commercial relationship with the company, suppliers must acknowledge acceptance of the Supplier Self-Declaration of Responsibility document, which includes compliance with the company’s Ethical Principles.
2. Through orders placed, contracts and tender specifications, which include clauses relating to: ethical principles for suppliers, sustainable procurement, confidentiality, information security and data protection, amongst others. 88.22% of orders included these clauses, whilst the remaining 11.78% are orders for spare parts or the movement of materials between ACCIONA Energía companies.

Management strategy

The strategy for supply chain management is mainly marked by the projects for the **construction and operation** of renewable energy facilities. The processes are integrated in the ERP, the supply management tool, the tender and supplier management tool.

THE COMPANY ALSO IMPLEMENTED THE SAP ARIBA TOOL, WHICH ALLOWS ALL THE RELEVANT PARTIES TO USE A COMMON PLATFORM FOR DRAFTING, REVIEWING AND SIGNING CONTRACTS.

In 2022, the ACCIONA Group’s Corporate Procurement Standard was adapted to a new Supply Chain Management Standard for ACCIONA Energía. The guidelines governing the Supply Chain and Legal Consultancy Relationship Model were revised; this is adopted on a voluntary basis in the management of processes relating to European Union directives in the field of public procurement.

To improve contract management, the company also implemented the SAP Ariba tool, which allows all the relevant parties to use a common platform for drafting, reviewing and signing contracts.

The Internal Code of Conduct Compliance Unit remained operational in 2022, in order to control intra-group commercial operations and ensure compliance with issues relating to fair market competition.

The Contractor Profile website (introduced in 2021 for the European Union) was extended to global contracting. This will promote greater transparency through objective and measurable criteria, and includes matters relating to sustainability.

The stipulation that the ESG score will account for 10% of the evaluation of the award in tenders with a budget of over €400,000 has also been maintained, with a specific Occupational Risk Prevention score of 20% applied in the case of service contracts.

Further initiatives have been implemented in relation to the reduction of greenhouse gas emissions in the supply chain, based mainly on meetings with suppliers to raise awareness of the measurement and reduction of their carbon footprint and the establishment of a roadmap for continuous improvement.

Finally, to ensure a sustainable approach throughout the supply chain, 100% of Supply Chain employees have targets linked to the Sustainability Master Plan.

Sector-specific characteristics of the supply chain

The group’s purchase categories with a higher volume of expenditure are wind turbine components, photovoltaic panels and structures, and the maintenance services for facilities in operation. The latter can be delivered locally, especially non-specialised services. Specialised services can only be provided by technicians, although ACCIONA Energía promotes local specialists. With regard to supplies, large components and some small spare parts can only be manufactured by offshore companies due to their specific nature.

→ DISTRIBUTION OF SUPPLIERS BY TYPE

	TOTAL NO.	STRATEGIC	NATIONAL/LOCAL	INTERNATIONAL
Suppliers	3,222	256	2,960	262



Strategic suppliers

A strategic supplier is defined as being one whose annual commercial relationship worth more than €400,000. 7.95% of the supply chain has been estimated as falling within this category, accounting for 93.97% of contracting.

National/Local suppliers

Working with national suppliers has a positive effect on the economic development of the communities and minimises operating risk as delivery and execution times are reduced. 91.87 % of the companies or means of distribution contracted are national and account for 75% of the expense in 2022.

International suppliers

When entering new countries, difficulties arise in finding a portfolio of national/local suppliers that meet ACCIONA Energía’s requirements. This requires prospecting the market and encouraging suppliers to adapt to ACCIONA Energía’s ESG culture.

A clear example of ACCIONA Energía’s preference for seeking suppliers in the country in which it is going to develop new activities is Brazil, where an active search for suppliers was carried out in 2022. Of the 35 suppliers working with the company this year in Brazil, 33 were contracted directly in the country.

RISKS IN THE SUPPLY CHAIN

ACCIONA Energía recognises two types of risk associated with procurement processes:

RISK ASSOCIATED WITH PROCUREMENT PROCESSES

Operating risk, such as interruptions in supplies.

Compliance, sustainability, environmental and social risk.

For each of these risks, specific preventive control mechanisms –periodically updated and configured- are developed that help minimise the probability of occurrence.

The Risk Map is the main tool for controlling and managing risk in ACCIONA’s supply chain, and is administered by PROCUR-e. The Group uses this mechanism to transfer corporate responsibility and sustainability criteria and policies to its entire supply chain. It is made up of eleven variables: ESG, ethics, integrity and governance, amongst others.

ACCIONA Energía has been using the **Supply Chain** variable for the purpose of verifying whether suppliers identify, control, assess and offer the capacity for improvement in their supply chain.

The company assumes the responsibility of identifying, preventing, mitigating and answering for the negative impact of its activities on **human rights** and is therefore committed to conducting due diligence on its suppliers.

The **Country Risk** variable is made up of various indexes extracted from Maplecroft and linked to various factors: child labour, freedom of association and collective bargaining, forced labour, decent working hours, fair minimum wage and discriminatory practices. Countries that obtain low scores are considered high risk and are audited.

Governance	93	Sustainable transformative innovation	109	Authenticity	114	Transparency	120	Supply chain	121
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The **Integrity** variable analyses the supplier’s position with respect to issues such as money laundering, tax havens, litigation for corruption, presence on international sanctions lists, etc. ACCIONA Energía supervises its strategic suppliers in this area when they are recurring suppliers or work in a high-risk country.

SUPPLY CHAIN CONTROLS

Since 2011, ACCIONA Energía has outsourced the validation of supplier information to Repro-Achilles for strategic suppliers.

In 2022 GoSupply was introduced as a validation platform for all suppliers, regardless of their risk, which will enable the assessment of five scores: **ESG, Compliance, Financial, Cybersecurity and Geopolitics**. These scores cover every aspect of the aforementioned variables to ensure that the supply chain knowledge base is much broader in the ESG area. Those scores will be taken into account in tenders.

GoSupply was used in Australia, Brazil, Canada, the USA and South Africa in 2022, and will be extended to the rest of the countries in which ACCIONA Energía operates in 2023.

This change entails the incorporation of a platform for ACCIONA Energía’s specific requirements, in strict compliance with international standards. GoSupply collects data directly from a number of external sources, reviewing suppliers and their partners, the parent company if applicable, subsidiaries, majority owners and related companies. Any findings that may compromise the integrity of the supplier triggers an alert through its Compliance Scorecard. This allows for a more comprehensive supply chain integrity check that not only includes the supplier but also their wider working environment.

Both Repro and GoSupply monitor each of their suppliers, using their Compliance and ESG scores to conduct an analysis of external sources and the questionnaire completed by the supplier to determine compliance in the relevant areas, and issue an alert if any critical issues are identified.

Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as risks of any kind increase, whether economic, country, activity and sustainability, as set out in the Supplier Risk Map. The levels are:

- 1. The supplier must acknowledge acceptance of the terms of the Self-Declaration document, which includes a commitment to the United Nations Global Compact, the ACCIONA Energía Ethical Principles for Suppliers and Contractors, ACCIONA’s Policies, Personal Data Protection, etc.
- 2. To be able to bid, collaborating companies must fill in the self-assessment questionnaire in PROCUR-e, GoSupply o Repro, so that ACCIONA Energía can calculate the variables or scores in the different fields.
- 3. Strategic suppliers (awarded more than €400,000 in the previous twelve months, require additional approval control, which verifies compliance with international standards on human rights, supplier integrity, financial solvency, up-to-date tax and social security payments, etc.)
- 4. Finally, the highest level is aimed at strategic suppliers in risk countries for which audits are carried out using the ACCIONA Energía Audit Protocol.
- 5. Audits have also been established for tier 2 suppliers of large components with contracts exceeding €5M. They are asked for a list of suppliers that account for 80-90% of the total expenditure of the supply contract with ACCIONA Energía, which are then audited.

Furthermore, ACCIONA Energía’s No-Go policies are used at all levels, regardless of the criticality and, in the event of failure to comply, they are not permitted to work for ACCIONA Energía.



NO-GO SUPPLIERS

Failure to comply with the minimums established in the No-Go Policies means that a supplier cannot be contracted until they resolve the underlying cause of this situation. ACCIONA Energía has met its 2022 target of 0% of general purchase orders to companies with this status.

The No-Go Policies include the following situations:

- 1 **Suppliers with significant ethical and integrity risk**, either because they are on international sanction lists or because they exhibit serious signs of corruption, fraud or money laundering.
- 2 **Strategic suppliers in at-risk countries that have not been audited**, or that have been audited and have one or more unresolved Serious Non-Conformities.
- 3 **Demonstrated non-compliance** with the United Nations Global Compact.
- 4 **Risk of economic solvency** (from €1 M of contracting).
- 5 **Debts** with the Social Security Institute or Tax Authorities.
- 6 **Companies penalised** due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

32 suppliers were classified as No-Go in 2022, of which 13 were removed from the category following auditing, action or improvement plans, or Enhanced Due Diligence. The latter consists of an investigation into any adverse impacts detected, communication with the supplier to confirm the information, and verification of the resolution of the conflict prior to entering into any new contract.

CONTROLS IN THE SUPPLY CHAIN IN 2022

SUPPLIER CLASSIFICATION



SUPPLIER PERFORMANCE ASSESSMENT

ACCIONA Energía carries out various types of supplier assessment prior to supply or service, designed to verify compliance with company standards and assess supplier performance.

Prior to entering a contract, ACCIONA Energía assesses potential risk and conducts a technical evaluation of critical services/supplies. On the basis of which a decision is made on the supplier's suitability for carrying out the work, and their performance is monitored until the end of the project.

At the end of the contract execution phase, the departments requesting the service/supply carry out an assessment of the performance of ACCIONA Energía's Supply Chain to obtain relevant data for future contracts. The assessment is made according to criteria in relation to periods, occupational health and safety, quality, environment, fulfilling of administrative obligations and technical skills. During the course of 2022 722 assessments were carried out. 93% of those evaluations were type A or B (very recommendable or recommendable supplier).

A modification of the assessment model is planned to streamline the process in 2023.

AUDITS

In addition to the two aforementioned assessments, ACCIONA Energía conducts audits to verify supplier ESG assessment and carries out controls on its non-tier 1 suppliers.

Annual audits of suppliers have been carried out since 2013. Of the 132 audits carried out in 2022, ninetytwo were conducted on direct suppliers that may pose a risk to the business due to their strategic status or simply because they are a strategic supplier in a risk country (China, India, Hong Kong and Vietnam).

Since 2018, ACCIONA Energía has also carried out audits of tier 2 suppliers to safeguard its supply chain and mitigate risk. At the close of 2022, through five strategic tier 1 suppliers, a total of 40 audits were launched on tier 2 suppliers in the following countries:

COUNTRY	NO. AUDITS	%
Spain	16	40 %
China	15	38 %
Italy	3	8 %
South Korea	2	5 %
EEUU	1	3 %
Portugal	1	3 %
Thailand	1	3 %
Vietnam	1	3 %

In accordance with ACCIONA Energía’s Audit Protocol, any Serious Non-Conformities identified in these audits, an Improvement Plan must be established until they are settled.

RESOLUTION OF SERIOUS NON-CONFORMITIES

ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. In the event that the deficiencies detected cannot be resolved within a reasonable period of time, the company is marked as No-Go. This contributes to significantly minimising supply chain risks. Focussing on the Non-Conformities of the 132 suppliers audited in 2022, the following is worth noting::

- 62 % had 0 SNCs.
- The remaining 38% signed up for the various action plans. Of this percentage, 23% have totally resolved their SNCs and the rest have not yet reached the deadline.

Only 2 suppliers were moved to No-Go status.

With regard to tier 1 and tier 2 suppliers from at-risk countries, 23 suppliers from China, Hong Kong, India and Vietnam were audited:

- 70 % of the audited suppliers had no Serious Non-Conformities. All the identified SNCs belonged to tier 2.
- None of the identified Serious Non-Conformities were related to DDHH. All of the cases identified were related to environment and occupational risk prevention.

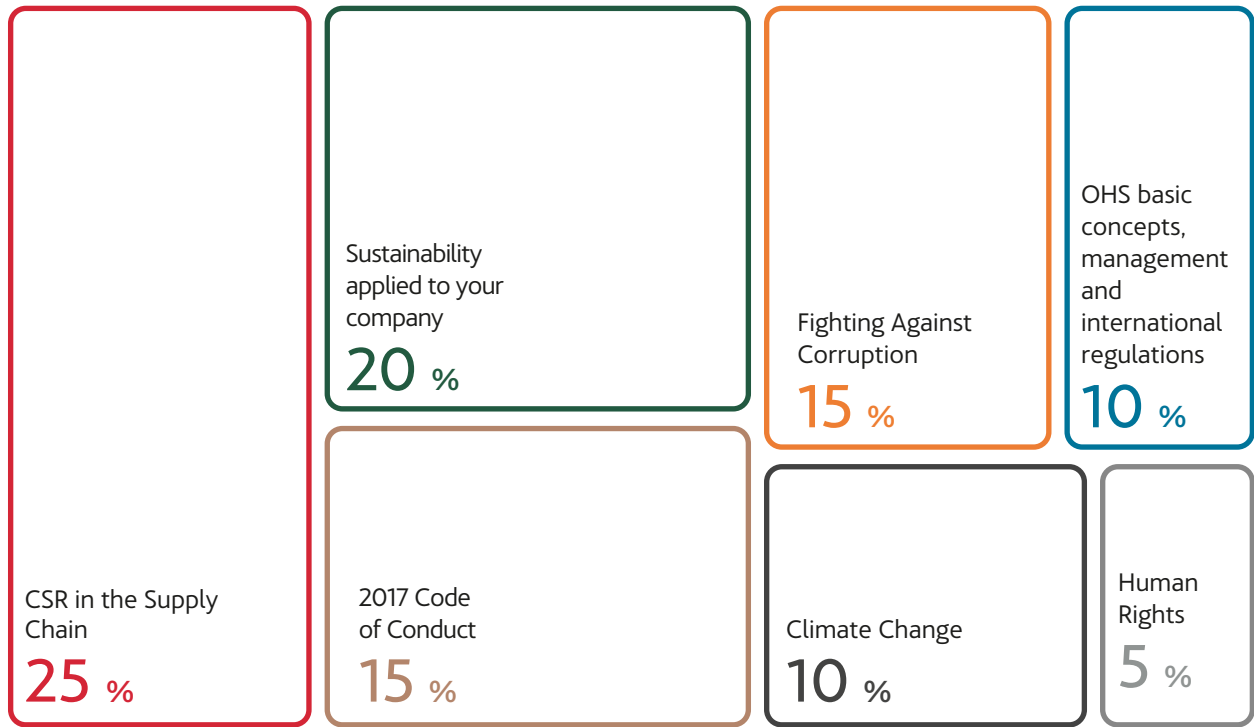
ACCIONA Energía is aware that insisting on the resolution of the Non-Conformities detected during audits is the correct path to help its distributors to improve as companies and mitigate the risks associated with the supply chain and contributes to increasing performance and generating shared value.

The GoSupply platform incorporates an audit module to facilitate the monitoring of the resolution of nonconformities, and another module for the technical rating of suppliers. This provides a more comprehensive overview by centralising all information on a single platform.

TRAINING AND COMMUNICATION WITH SUPPLIERS

The Corporate University Supplier Campus is integrated into PROCUR-e, available free of charge to 100% of the supply chain. Throughout the last financial year, 13 suppliers attended 20 courses out of those offered on the campus. The courses that have generated the most interest are those involving Sustainability.

→ TRAINING OF SUPPLIERS IN 2022



COMMUNICATION WITH SUPPLIERS

Suppliers have two-way channels to raise matters in relation to their commercial relationship with ACCIONA Energía:

**Proveedores.Energia@acciona.es**  
**Suppliers.Energy@acciona.com**

Likewise, suppliers can make use of the Ethics Channel to report any irregular practice detected, which will be duly analysed by the company.  
<https://canaletico.acciona.com/>.

At the same time, ACCIONA Energía stores information relating to approval and technical qualification on the Contractor Profile. Specifically, suppliers will be able to see their Repro ESG score and their PROCUR-e OHS risk, in addition to their technical qualification in the areas of quality, OHS and environment in the categories that apply. The visualisation of GoSupply scores will be incorporated in 2023.

2022 saw the third edition of the ACCIONA Energía award for suppliers in projects in the construction phase, which recognises excellent performance evaluation, active solution seeking, competitiveness of products and/or services, and collaboration in management and innovation. No award was given this year, since geopolitical circumstances meant that the required standards for recognition were not met.

SUPPLY OF SUSTAINABLE PRODUCTS

ACCIONA Energía has complied with the criteria of the Sustainable Procurement Guide. Sustainable purchases in 2022 amounted to €46,490,360.76, itemised as follows:

TYPE OF SUSTAINABLE PURCHASE	NO. OF SUPPLIERS	IA MOUNT EUR
Special Employment Centre	5	464,900.70
Insertion company	2	22,308.58
Carbon-neutral Certificate	3	374,829.56
Sustainable mobility	2	168,799.80
Herbaceous	132	21,578,719.11
Reconditioned material	4	931,981.84
Repairs	88	22,948,821.18
GENERAL TOTAL	236	46,490,360.76

In 2023 it is planned to introduce new criteria and to automate the tools to facilitate their control.

COMPLIANCE WITH 2022 TARGETS

The main sustainability targets associated to the supply chain are summarised below. The most noteworthy include:

SUSTAINABILITY TARGETS ASSOCIATED TO THE SUPPLY CHAIN

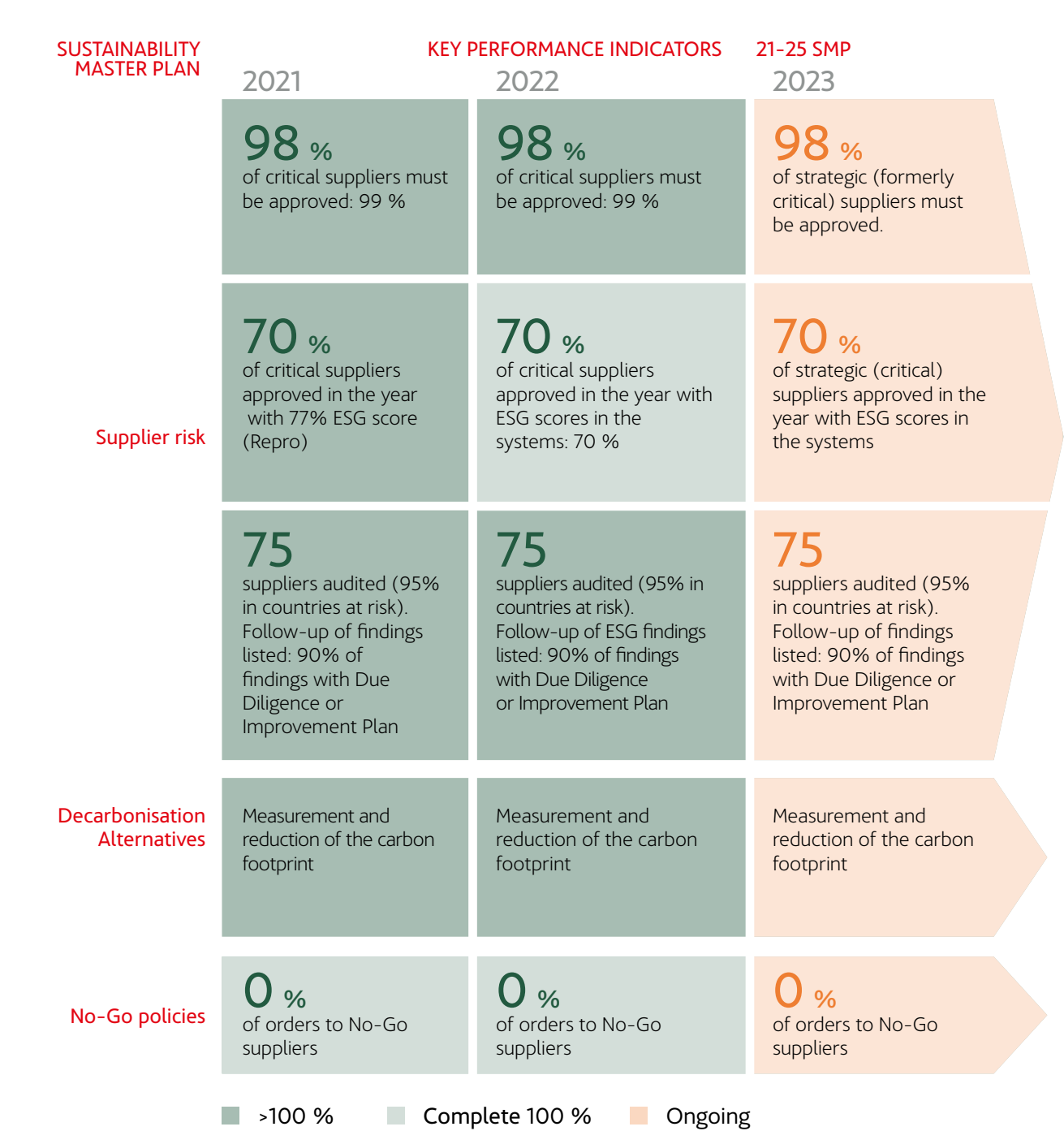
- 01Implementation of GoSupply as an analysis tool adapted to business risks.
- 02Adaptation of the Contractor Profile for use outside the European Union.
- 03On-site audits of 40 Tier-2 suppliers to provide more in-depth knowledge of the supply chain.
- 04Implementation of a contract management tool in EU countries to reduce the use of paper.

Governance	93	Sustainable transformative innovation	109	Authenticity	114	Transparency	120	Supply chain	121
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In addition, the following SMP-related challenges are worth highlighting:

The downward variance in some of the targets is driven by the change of systems outlined above (transition from PROCUR-e, Repro and GoSupply).

→ DEGREE OF FULFILMENT OF SUPPLY CHAIN TARGETS IN 2022



CHALLENGES FOR 2023 IN SUPPLY CHAIN MANAGEMENT

- 01
- Expansion of GoSupply into new countries to increase control of suppliers as risk increases.
- 02
- Global promotion of the Contractor Profile for tenders above €400,000 for reasons of transparency.
- 03
- Promotion of audits of tier 2 suppliers for tier 1 equipment supply contracts worth more than €5M, supervising 80-90% of the supply.
- 04
- Review of Sustainable Procurement criteria and system automation to facilitate their control.
- 05
- Review and improvement of supplier performance assessment and its automation.

07

# INTEGRATE TO TRANSFORM

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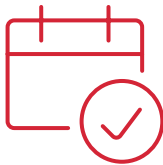


# DIFFERENCE IN EVERY PROJECT

ACCIONA Energía has the capacity to create a unique sustainable difference as it has a portfolio of solutions aligned with sustainable transformation.

	01	02	03	04
	SOLUTIONS BASED APPROACH	SUSTAINABLE DIFFERENCE IN EVERY PROJECT	LOCAL ECOSYSTEMS	FINANCING SUSTAINABLE
RESPONSIBLE	EXCELLENCE	MINIMUM IMPACT	PARTICIPATE	MEASURE IMPACTS
RESILIENT	INNOVATION	PROGRAMMES WITH THE COMMUNITY	PROPOSE AND LEAD INITIATIVES	OFFER OPTIONS
REGENERATIVE	TRANSFORMATION	VISIBLE DIFFERENCE	CO-CREATE WITH CLIENTS	DEVELOP ADJACENT PROJECTS
	The value proposition is based on integrated infrastructures designed to maximise their contribution to the Sustainable Development Goals	The sustainable difference of ACCIONA Energía is evident in each project	To develop an ecosystem of organisations capable of increasing our capacity for regenerative transformation	To maximise the capacity of sustainable finances to enhance the company's value and the competitive regenerating advantages of projects

## KEY MILESTONES 2022



235% increase in the number of projects with Social Impact Management.

Creation of a “Regenerative playbook” (manual) to standardise the process of developing regenerative differences in all the company’s activities.

Closing the MacIntyre financing, worth more than €1,000M. Two “green” and one “Sustainability Linked” financing instruments were combined to create a single local impact objective.

ACCIONA Energía is ranked as the second best company in the electricity sector in Standard & Poor’s Corporate Sustainability Assessment (CSA).

Approval and implementation of Social Impact Management methods+.

Communication of the contents of the regenerative Playbook to raise employee awareness and impart company values.

Launch of a new Financing Framework to help showcase ACCIONA’s “impact” approach.

Refine the sustainable investment strategy through an active engagement plan with stakeholders to consolidate the company’s leadership in ESG areas.

## MAIN CHALLENGES 2023



# Solutions based approach

The value proposition for this area of the Sustainability Master Plan 2025 is based on boosting the integrated infrastructures to maximise their contribution to the Sustainable Development Goals (SDGs). The various enterprises of the company work together to design and offer their customers solutions that advance the achievement of the SDGs to the greatest possible extent.

## SOCIAL IMPACT MANAGEMENT +

In 2022, the company worked on updating the Social Impact Management methodology. This review resulted in the Social Impact Management + methodology, which will be implemented in 2023. This new methodology was created to develop differential actions for the efficient mitigation of risks and enhance the regenerative impact of projects. The evolution of the company’s social strategy focused on the following milestones:

- The application of a human rights based approach aligning social impact management with the social safeguards due diligence system.
- The adaptation of solutions to the context and location in which ACCIONA Energía operates, with a focus on understanding local contexts from the initial stages of the project.
- The incorporation of differential social capacities that align project potential and the gaps identified at local level.

ACCIONA Energía considers Social Impact Management + as a process for the identification, analysis and management of the social consequences deriving from the development of its projects. At the same time, the company aims to contribute to the reduction of social gaps in its projects’ area of influence. This methodology seeks to place stakeholders at the centre of its decisions and build alliances to maximise the impact of its actions.

This new methodology has allowed ACCIONA Energía to develop local analysis and diagnosis tools that enable the early identification of risks and the early observation of opportunities, while incorporating local assessment of the progress of the Sustainable Development Goals. This new approach allows for time oriented and locally context-based planning of differential social initiatives.

Along similar lines, work has been undertaken to update the Corporate Instruction Communication and Dialogue with Communities and other Stakeholders, in order

to encourage relationships based on a commitment to communication, dialogue and continuous engagement with communities and other stakeholders, with a view to generating shared value and establishing long-term relationships.

The Corporate Standard for Social Impact Management + of Projects, together with Corporate Instruction on Relations with Communities and other Stakeholders, are the procedures that establish the guidelines for maximising the social performance of ACCIONA Energía’s projects and services.

## Social Impact Management Methodology (SIM)

The management of the impact social consists of two main phases:

### — Bid phase:

- 01 **Definition of the scope of social impact management:** identification of the area of direct and indirect influence, based on the characteristics of the site and its surrounding environment.
- 02 **Identification of social risks and gaps via on-site visits:** based on the importance of the project or service, visits are made to the area of influence of the project in order to carry out an indepth analysis of the local context in which ACCIONA Energía operates.
- 03 **Characterisation of risks and social gaps and budget allocation:** identification and assessment of risks and social gaps, according to the location of the project. This characterisation is based on the analysis of more than 70 ESG indicators, complemented by manual validation by ACCIONA Energía personnel involved in the study. The characterisation includes 19 indicators for human rights management which include the rights of indigenous peoples. The budget allocation for social impact management is based on the assessment of each risk event and gap.
- 04 **Project categorisation:** classification of the project according to the tender budget and the result of the risk and gap assessment. On the basis of this classification, the methodology provides an approach to risk mitigation and prevention, or to the reduction of social gaps in the project’s area of influence, or to both.

— Execution phase:

- 01 **Social assessment of the project:** analysis of the characteristics of the area of influence of the project, identification and assessment of positive and negative social impacts and, where appropriate, of the social gaps, and preparation of a proposal for social initiatives.
- 02 **Relationship with communities and other stakeholders:** active engagement and participation with the community and stakeholders in managing the social impact of the project or service.
- 03 **Design of social initiatives and search for partnerships:** definition of the most appropriate social measures to manage the impacts of the project or service, and the search for local partnerships for the development of appropriate social initiatives.
- 04 **Implementation and monitoring of initiatives:** implementation of the defined initiatives and measurement of their impact.

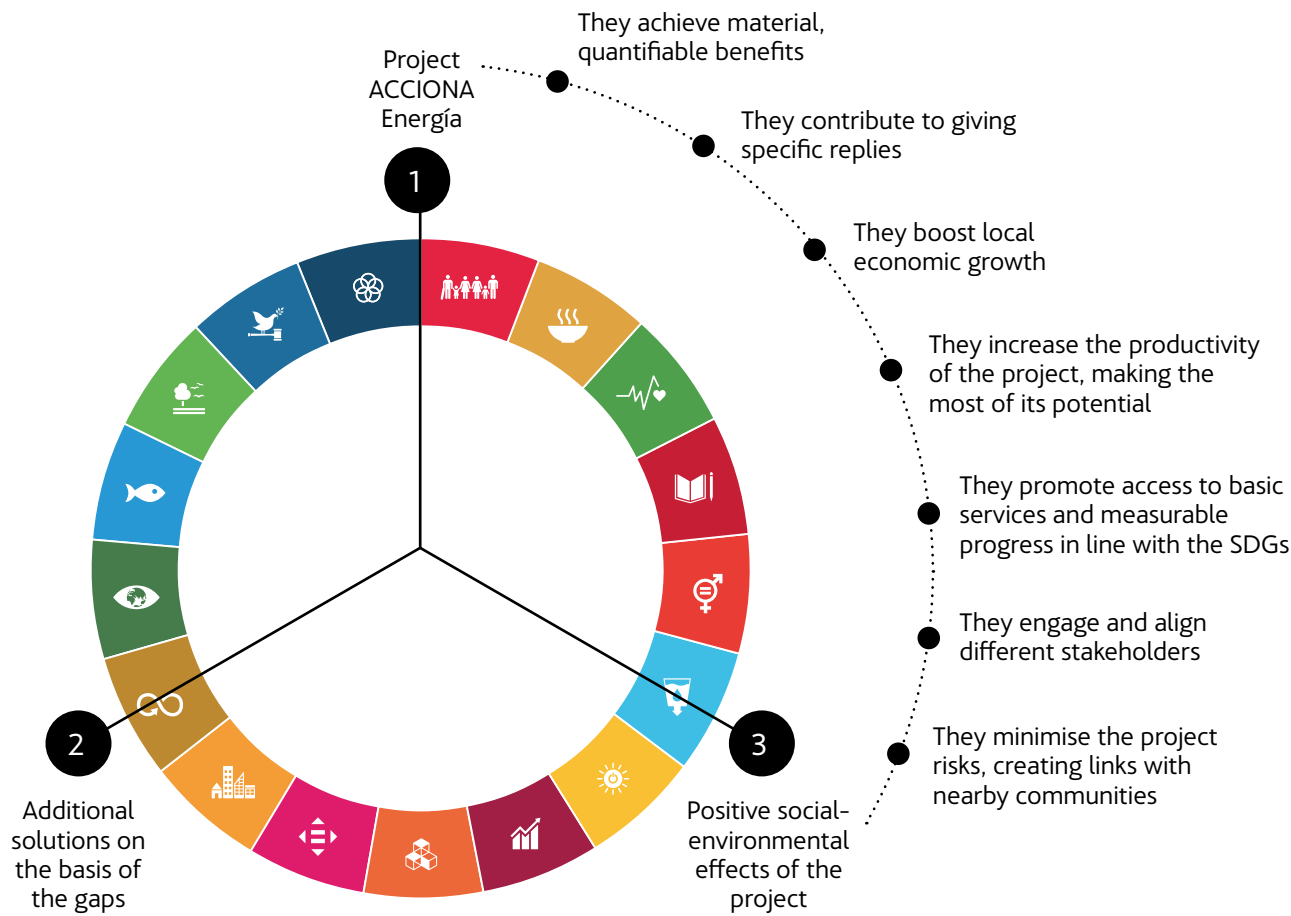
# Sustainable difference in every project

## HIGH IMPACT SOLUTIONS

ACCIONA Energía aims to demonstrate the sustainable difference in each activity it undertakes. The business lines, and especially the projects, develop their own distinctive identity, of a regenerative/sustainable nature during execution, which are recognisable by third parties.

With this in mind, the company seeks to enhance the transformative effect of its projects by maximising the impact they generate in terms of local impact, return of investment, and acceleration of sustainable development. To this end, it has designed the High Impact Solutions, which, through the creation of adjacent benefits, contribute to improving the living conditions of the population and/or the environment in the vicinity of the projects.

→ BENEFITS OF HIGH IMPACT SOLUTIONS



The development of renewable energy infrastructure is directly or indirectly linked to the achievement of the Sustainable Development Goals. In fact, the company's High Impact Solutions approach helps to channel the necessary investment towards projects that promote the global sustainability agenda.

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Letter from  
the Chairman

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Only in  
renewables

3  
Sustainability  
and materiality  
governance

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People centric

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to transform

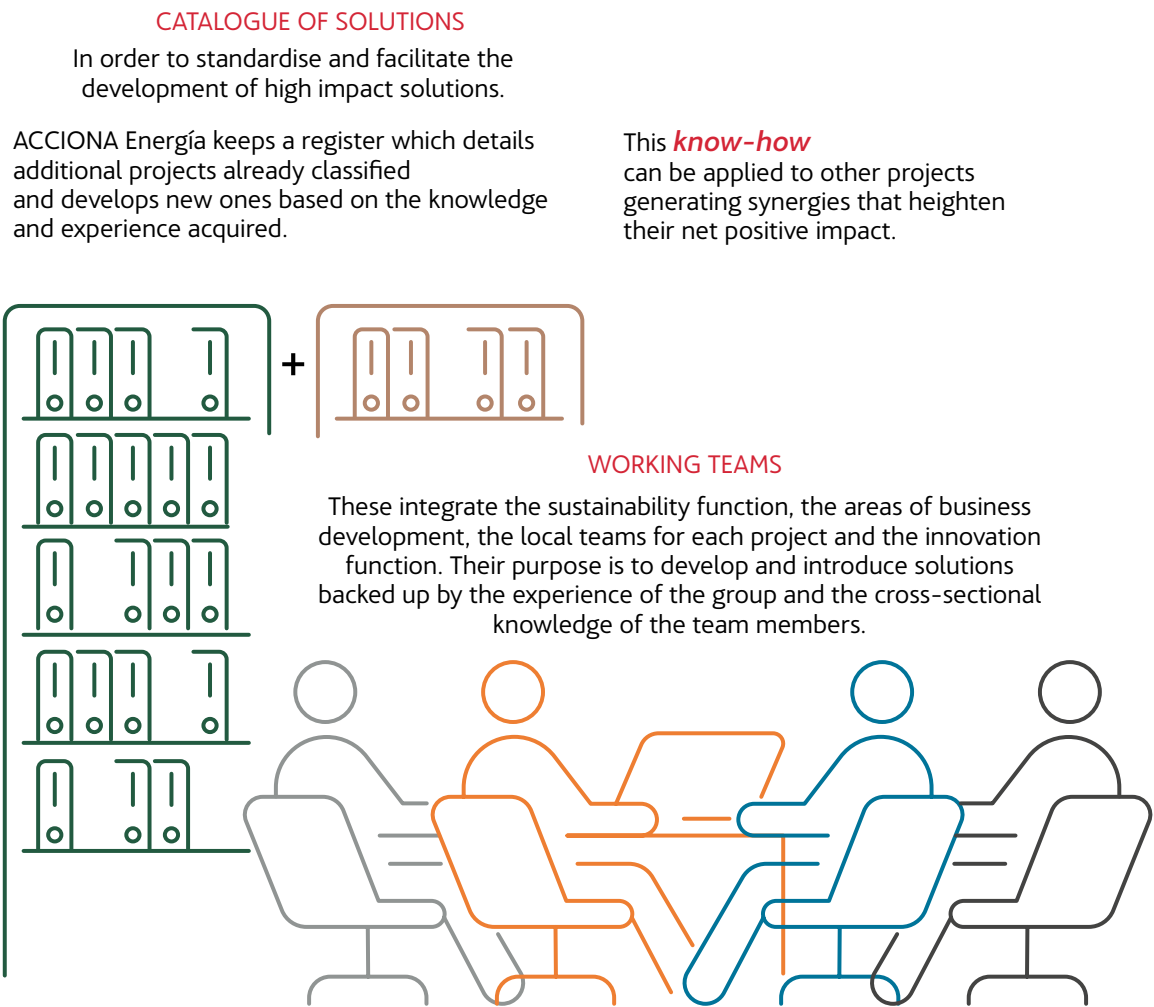
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Impact  
per region

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ACCIONA Energía acts directly on social or environmental gaps identified in the immediate vicinity, such as gender equality and inclusion of disadvantaged groups, entrepreneurship, lack of access to basic services such as water, energy or telecommunications, the regeneration of ecosystems and other benefits. The aim is to promote inclusive economic growth integrated into the places where it operates. Projects for generating adjacent benefits have been designed to provide a sustainable service over time, either through their development as new business models or through collaboration with third parties to ensure their longterm operation and maintenance.

Work tools

In order to implement High Impact Solutions, the company has established a series of tools and teams:



The development of High Impact Solutions requires the creation of a collaborative environment with a network of project partners and stakeholders taking an active role in carrying out and operating additional projects: multilateral development banks and impact and innovation funds, NGOs, cooperation agencies, public administrations and other foundations, community representatives and local companies.

High Impact Solution Methodology

ACCIONA Energía has a process for evaluating the potential of including this type of solution in a project, which can be initiated at any stage, not only in the initial phase of identifying a business opportunity. The process is divided into the following stages:



Local ecosystems

In order to implement the methodology for the development of regenerative infrastructures, it is essential to develop an ecosystem of local organisations that are capable of identifying the regenerative transformation potential of local contexts. To this end, dialogue environments are established with third parties for the development of work programmes, initiatives and collaboration projects that increase the company’s capacity to develop or improve regenerative solutions.

SOCIAL IMPACT MANAGEMENT AND RELATIONS WITH STAKEHOLDERS

→ DEVELOPMENT OF LOCAL COMMUNITIES

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Significant	<ul style="list-style-type: none"><li>• Loss of market share</li><li>• Loss of impact</li></ul>	<ul style="list-style-type: none"><li>• Increase in share value due to the regenerating aspect of the solutions</li><li>• Increased revenue</li></ul>

ACCIONA Energía considers the management of the social impact of its projects and services as one of the key strategic aspects of its sustainable business model. The company understands Social Impact Management (SIM) as a process of identification, analysis and management of social consequences, intentional or otherwise, both negative and positive, derived from a project or service carried out in a community.

For over ten years, ACCIONA Energía has its own social impact management methodology, based on international standards<sup>14</sup>, adapted to the different geographical contexts. This methodology is a differentiating element that contributes significantly to minimising the negative impacts and increasing the positive ones, and to improving the relations with communities and other stakeholders.

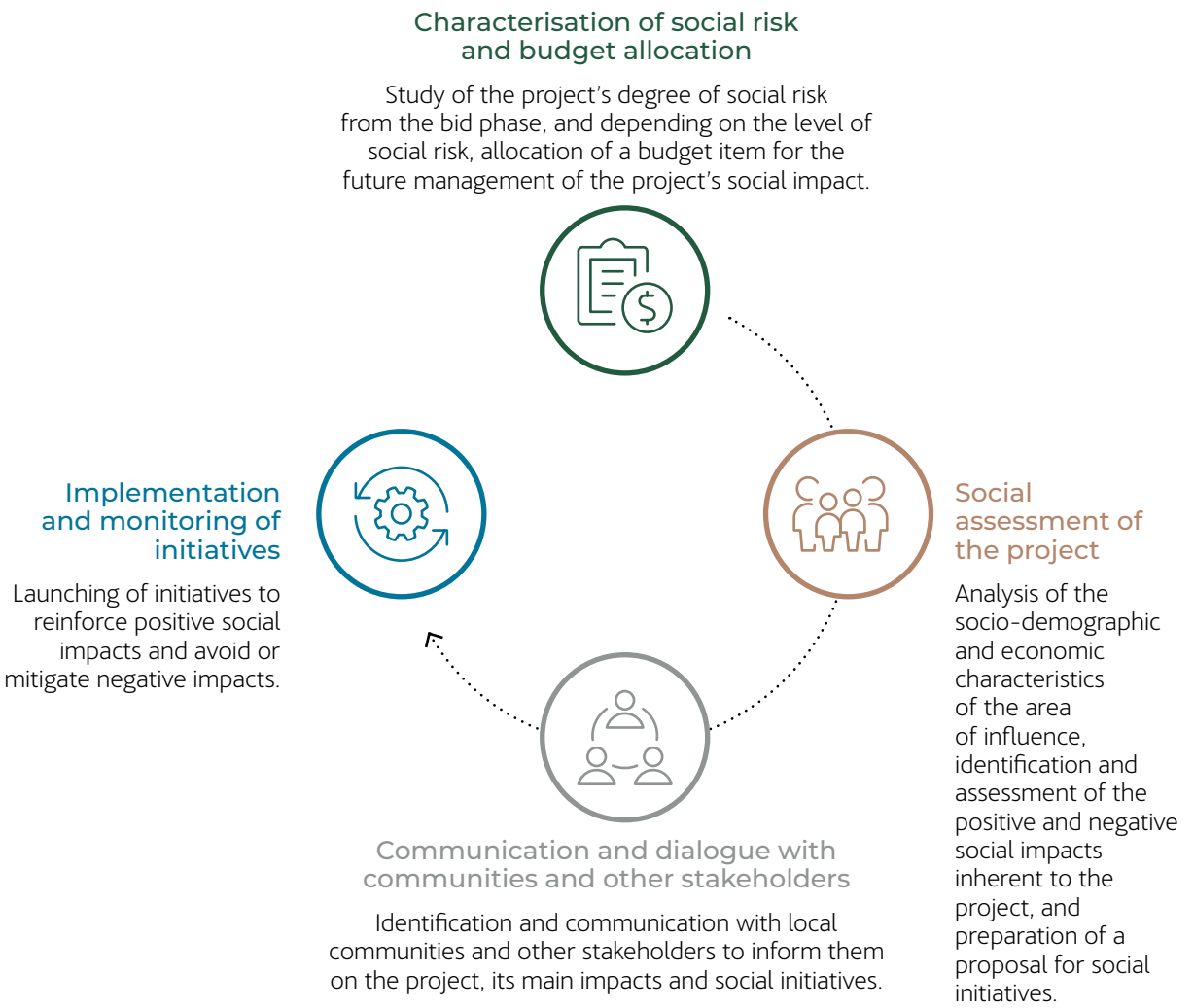
<sup>14</sup> IFC performance standards on environmental and social sustainability, Guidelines for Environmental & Social Impact Assessment (ESIA) WBCSD, Guidance for assessing and managing the social impacts of projects (International Association for Impact Assessment), The Equator Principles, World, Bank Environmental and Social Framework.

The company’s own social impact management methodology makes it possible to know about and manage the concerns and expectations generated by ACCIONA Energía with its activity, through communication and dialogue with the communities.

The Corporate Standard for Social Impact Management of Projects, together with Corporate Instruction on Communication and Dialogue with Communities and other Stakeholders, are procedures that set out the guidelines for managing social performance throughout the life cycle of a project or service.

Social Impact Management Methodology (SIM)

Social impact management consists of four main phases:



It should be noted that ACCIONA Energía allocates at least 0.3% of the BOP<sup>15</sup> of the construction of a project to Social Impact Management in the pre-construction and construction phases. Similarly, in the operation phase of the facility the investment each year is at least 0.2% of the “gross sales” for the project during the previous year<sup>16</sup> during the first 10 years of operation of the facilities; the investment could continue throughout the entire useful life of the project.

During 2022, the Corporate Standard for Social Impact Management was introduced into 114<sup>17</sup> projects (235% more than in 2021) in 13 countries: 76 in the Development phase; 14 in the Construction phase; and 24 in the Operation and Maintenance phase. 212 initiatives were designed and implemented, reaching 193,979 direct beneficiaries.

COUNTRY	PHASE	PROJECTS
Australia	E&C	2
	O&M	1
Brazil	Development	3
Chile	Development	4
	O&M	7
Colombia	Development	1
Costa Rica	O&M	1
Dominican Rep.	E&C	1
Spain	Development	66
	E&C	6
	O&M	3
India	O&M	1
Mexico	O&M	5
Peru	Development	2
	E&C	1
Poland	O&M	1
USA	E&C	4
	O&M	3
South Africa	O&M	2
	TOTAL	114

<sup>15</sup> BOP-Balance of Plant: This includes the following aspects: engineering, civil works, MV infrastructure, park substation, interconnection infrastructure, others (contingencies, weather tower, etc.).  
<sup>16</sup> For the first year of operation, an average estimate of forecast sales is taken as reference.  
<sup>17</sup> 2 projects in the Construction phase and 13 in Development were postponed or halted in 2023, with varying degrees of progress in Social Impact Management.

PHASE	COUNTRY	PROJECTS
Development	Brazil	3
	Chile	4
	Colombia	1
	Spain	66
	Peru	2
	Subtotal	76
Engineering and Construction	Australia	2
	Dominican Rep.	1
	Spain	6
	Peru	1
	USA	4
	Subtotal	14
Operation and Maintenance	Australia	1
	Chile	7
	Costa Rica	1
	Spain	3
	India	1
	Mexico	5
	Poland	1
	USA	3
	South Africa	2
	Subtotal	24
	TOTAL	114

→ SIM PROJECTS





The main adverse impacts resulting from project development with social impact management in 2022 include: noise and water pollution; deterioration of transport routes; visual impacts; temporary impacts on infrastructure and basic services; changes in land use with possible impacts on tenants. Project development also generates a number of positive impacts, such as:

- Creation of direct and indirect employment.
- Support for the achievement of sustainable development objectives at regional and state level.
- Increased funding available to local councils.
- Improvements in the well-being of the area of influence.
- Use of municipal services.
- Acquiring goods and services in the project’s area of influence.
- Socio-economic development.
- Increase in the standard of living of the population.

Examples of the positive impact generated by ACCIONA Energía projects can be seen in section #CommittedToPeople | #ComprometidosConLasPersonas - on the YouTube channel.

ACCIONA Energía’s specific methodology makes it possible to stay ahead in the identification, evaluation and management of these impacts. Depending on the final valuation of impacts, the methodology requires priority actions to be established on any impacts assessed as high. Initiatives are adapted to the geographical context of the project or service and include a wide variety of activities, such as:

Almendralejo, Badajoz - Spain

COLABORA PROGRAMME

A youth empowerment programme for the creation of agents of change to help transform local businesses.

The Colabora Almendralejo programme is promoted by ACCIONA Energía, with the support of Almanatura, and in collaboration with Almendralejo Council. It aims to promote the development of a community of young people and undertakings in Almendralejo to accelerate the transition to a socio-environmentally responsible economic model and improve employment prospects in the area. The objectives are the following:

- **Raising awareness of local issues and viable solutions**, with a view to motivating young people and local businesses to positively transform the territory.
- **Developing skills and knowledge for designing sustainable solutions** in the business fabric and youth empowerment.
- **Strengthening the community of young people and companies that act as agents of change** for improving sustainability and well-being in the region.
- **Connecting young talent with local businesses to enhance synergies** and facilitate the transformation towards sustainable models and increased employability.
- **Contributing to the transformation of local rural enterprises** to solve challenges, while generating employment opportunities and responding to local social and environmental needs.

Links to publications:

[Interacciona - Servicios/ Noticias](#)

[ACCIONA Energía signs an agreement for collaboration with the Council on employability - Almendralejo-Tierra de Barros - COPE](#)

Villalba de Rey, Cuenca - Spain

REVITALISATION PROGRAMME FOR THE SAN SEBASTIAN OIL COOPERATIVE

A social intervention programme, promoted by ACCIONA Energía, with the support of Agrovidar, designed to boost the performance of the oil cooperative located in Villalba del Rey.

The project consists of the following phases:

- **Diagnostic report:** analysis of the state of olive production, oil production and marketing of the Cooperative.
- **Operational report:** improvement strategies for production, processing, marketing and implementation of services in the Cooperative.
- **Implementation:** implementation of the identified measures agreed with the Cooperative.

Araucania Region – Chile

ARAUCANÍA TECHNICAL TRAINING CENTRE COLLABORATION AGREEMENT

Collaboration programme to strengthen human capital. Partnership to strengthen the renewable energy technician career programme at the State Technical Training Centre.

Links to publications:

[ACCIONA Energía signs an agreement with the Araucanía Technical Training Centre to boost the training of future technical experts in the sector](#)

Northern Cape – South Africa

NORTHERN CAPE HONEY FARMER INCUBATOR

The programme aims to contribute to the sustainable development of the most disadvantaged local communities near the Sishen photovoltaic plant by encouraging entrepreneurship in the profitable honey production.

The project is expected to create 105 jobs, 18 agricultural cooperatives, a warehouse and a bottling plant. It is expected to contribute 15 million rand per year (about one million euros) to the local economy through honey sales. The Sishen PV plant will invest in this project for two to three years until it becomes self-sustaining.

Project participants will undergo a training programme before starting bee keeping operations. This will provide the knowledge, skills and experience necessary to operate their own facilities. The training has a 70% practical component and 30% theory component, which will be provided by expert honey producers Each SME is expected to consist of a five-person farming cooperative, equipped with 200 hives, and producing an income of 480,000 rand per year (about €30,000).

Links to publications:

[Entrepreneurship and biodiversity come together in an initiative to foster honey production near the Sishen photovoltaic plant \(South Africa\)](#)



**Puerto Libertad, Sonora, Mexico.  
La Venta, Juchitran, Oaxaca - Mexico  
Doroteo Arango and Villagran, Tamaulipas - Mexico**

**TOKT, CUIDAT AND PINTAT DE ROSA**

- Screening for women in relevant age groups.
- Events for raising awareness and broadcasting the prevention of breast and cervical cancer.
- Breast cancer awareness workshops.
- Breast cancer screening with a mobile mammography service.
- Review of results, advice and referral for patient care and follow-up.

**Links to publications:**

[ACCIONA Energía vuelve a poner en marcha en México la campaña TokT, CuidaT y PintaT de Rosa](#)

**MacIntyre – Australia**

**Scholarship programme** enabling students with financial difficulties to continue their studies at university.

**Links to publications:**

[MacIntyre Wind Farm scholarship recipients announced \(acciona.com.au\)](#)

Along similar lines, ACCIONA Energía establishes channels and activities for managing stakeholder concerns and expectations. In line with the Equator Principles, 100% of ACCIONA Energía’s projects have complaint collection mechanisms for communities and other stakeholders, as well as specific communication channels for all its projects, which include community meetings, contact phone numbers, emails addresses and suggestion boxes-. Communities also have access to ACCIONA Energía’s Ethics Channel, in which a public form is available on the website for anyone wishing to submit queries and/or suggestions regarding any project.

**Examples of these channels  
at project level are:**



**SPAIN**

Measures implemented during the construction of the Bolarque photovoltaic plant project included school talks, a community dialogue table, and a session for workers on positive coexistence. This participation led to joint agreement with local residents to develop the above-mentioned programme for the revitalisation of the San Sebastian Cooperative in Campo San Sebastian.

**Links to publications:**

[ACCIONA Energía promotes various initiatives for information and social participation inthe vicinity of the Bolarque photovoltaic plant](#)



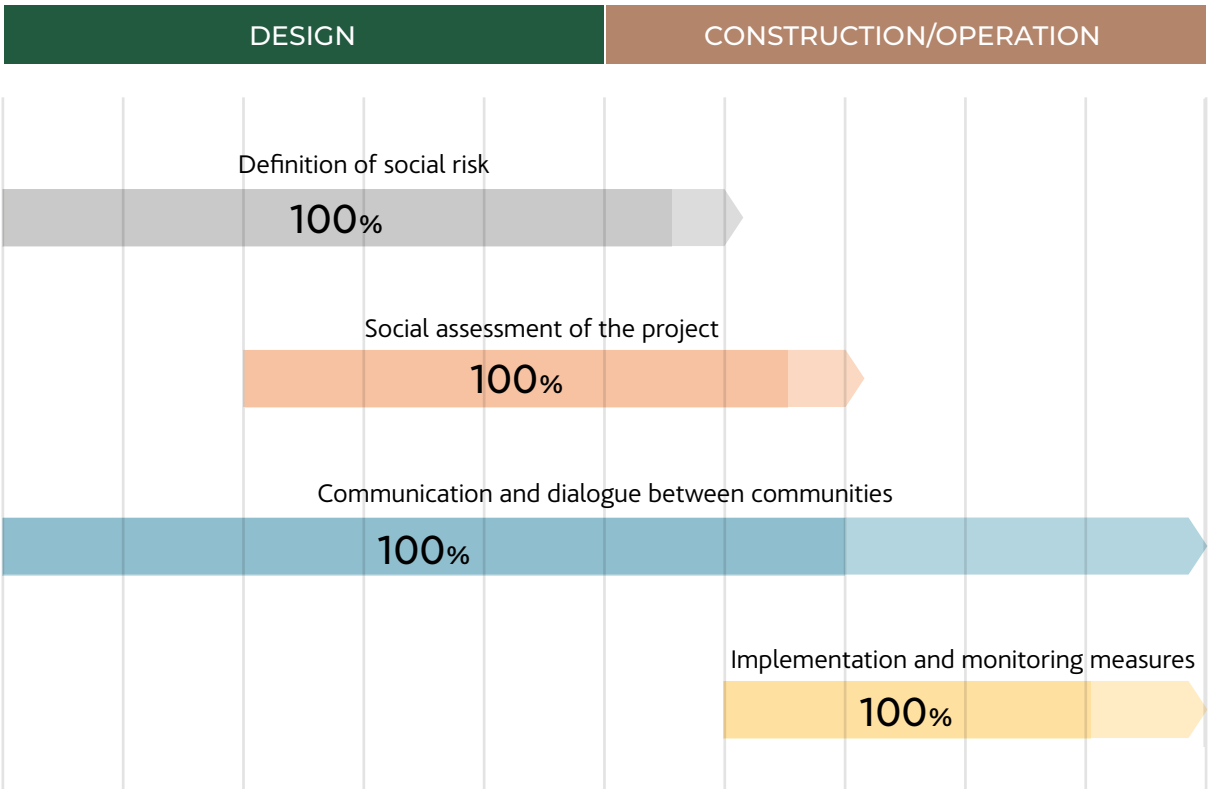
### Australia

In Australia, the website dedicated to each project has a link to the Community Hub, a powerful platform designed to promote communication between the company and all those interested in the project. The website publishes the progress of the project, notices of any impact on local infrastructure, contact details, etc., and allows anyone to send questions, make complaints, submit proposals to access initiatives funded by ACCIONA Energía, etc.

#### Links to publications:

Example of the MacIntyre Community Hub: [MacIntyre Wind Farm | Community Hub \(acciona.com.au\)](https://acciona.com.au)

### → PHASES OF SIM METHODOLOGY AND STATUS OF IMPLEMENTATION (% OF THE TOTAL PROJECTS WITH SIM)



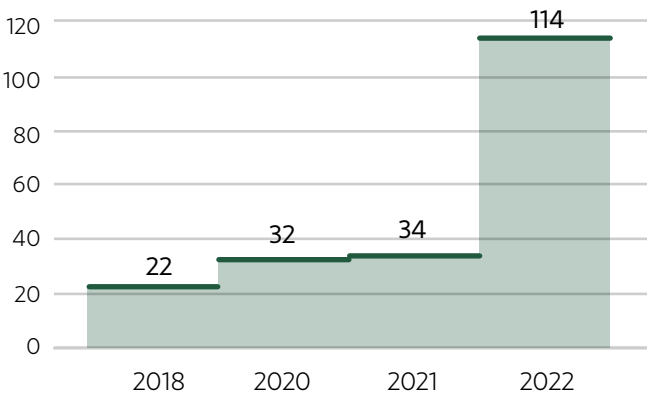
### Audits on the use of GIS methodology

External audits assess the degree to which the GIS methodology has been applied, verifying compliance with the Corporate Social Impact Management Standard for projects. The process includes the results of the characterisation of social risk; the analysis of the socio-demographic characteristics of the project's area of influence; the identification and assessment of the positive or negative and real or potential social impacts deriving from the operations of certain projects and services; the correspondence of the proposed social measures with the prioritised impacts; the identification of stakeholders and communication. The scope of the audits also includes the following criteria and relevant aspects related to best practices:

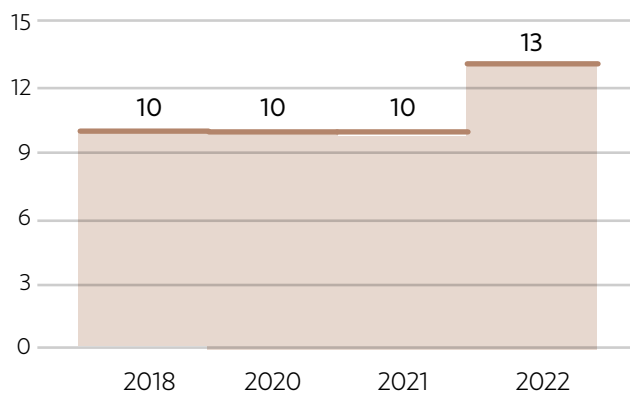
- Analysis of criteria and relevant aspects under the SA 8000:2014 International Standard, choosing which of them are covered in the projects and which could be included to facilitate their application.
- Analysis of the “Matrix Outcome” tool of Big Society Capital to identify the areas and beneficiaries on which the activity has an impact.

### → EVOLUTION OF THE IMPLEMENTATION OF SOCIAL IMPACT MANAGEMENT (SIM) METHODS

#### Projects



#### Countries



- Analysis of the safeguards established by the European Taxonomy. These guarantees are based on OECD Guidelines on multinational companies, the UN's Guiding Principles on business and human rights and the fundamental International Labour Organisation Conventions (ILO).
- Analysis of the Guide to Human Rights Impact Assessment and Management<sup>18</sup> to ascertain the potential and/or existing risks and impacts of human rights in the projects, and to determine the ability to management them.

Since 2017, ACCIONA Energía performs two audits per year. This year, 2022, they were performed on the Calabaza photovoltaic plant (Dominican Republic) and the San Carlos wind farm (Mexico).

They concluded that the methodology is being implemented correctly in each of the phases. In 2022, the audit reports highlight ACCIONA Energía's efforts to improve the analysis of the local context of a project's area of influence, as well as the establishment of social initiatives for all impacts identified and assessed, whether positive or negative. The conclusion is that appropriate social measures have been proposed for these impacts. Transparent communication and dialogue with stakeholders are also emphasised.

COMMITMENT TO THE COMMUNITY

ACCIONA Energía understands its major role in the economic development of the communities in the countries where it operates and its capacity as a driver for improving people's quality of life. This commitment has translated into the following results:

- Over €3 million in social investment in the community.
- More than 300,000 people have benefited directly and indirectly from the various social initiatives implemented.

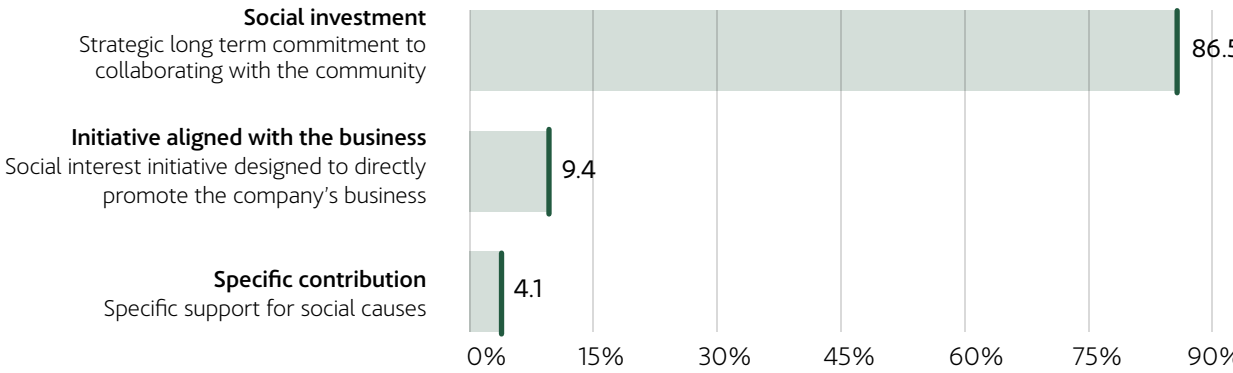
These activities, implemented in 13 countries, contribute to people's well-being by widening their access to education, encouraging sport and healthy lifestyle, and promoting the conservation of their heritage and care for the environment and biodiversity. They also focus on job creation by training workers and

promoting local businesses. Improving community infrastructure is another of the company's social action objectives.

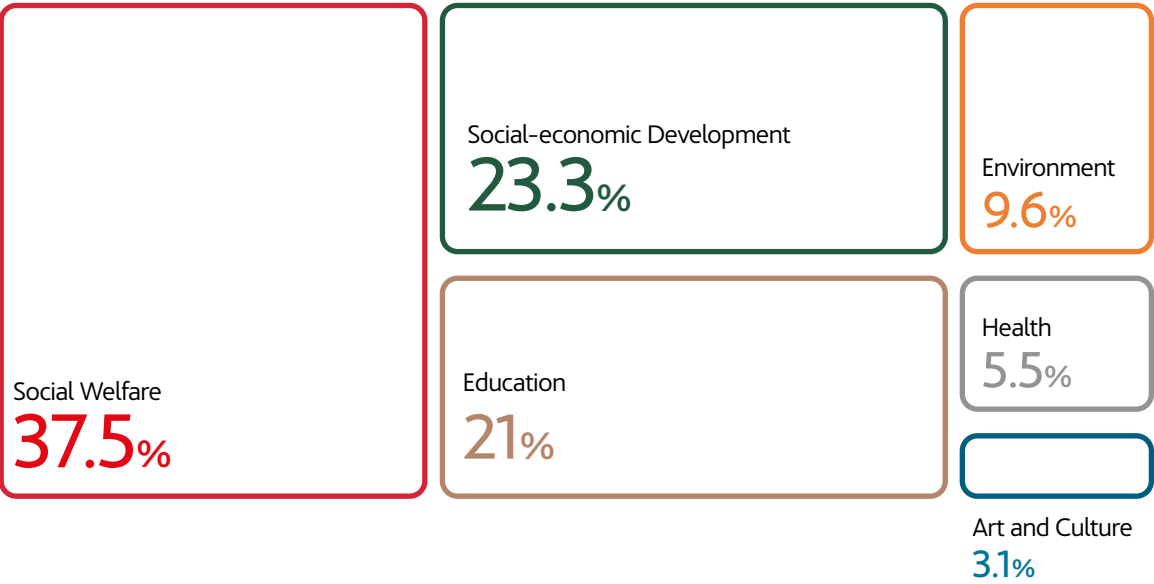
Measuring investment in the community

ACCIONA Energía measures and evaluates its investment in the community and the degree to which it contributes to the 17 Sustainable Development Goals, which allows for an overview and comparison of results with other companies.

MOTIVATION FOR THE INITIATIVES



CONTRIBUTION BY AREA OF ACTION



<sup>18</sup> Guide drawn up by the International Business Leaders Forum, (IBLF) and the International Finance Corporation (IFC) in association with the United Nations Global Compact Office.

→ TYPE OF CONTRIBUTION



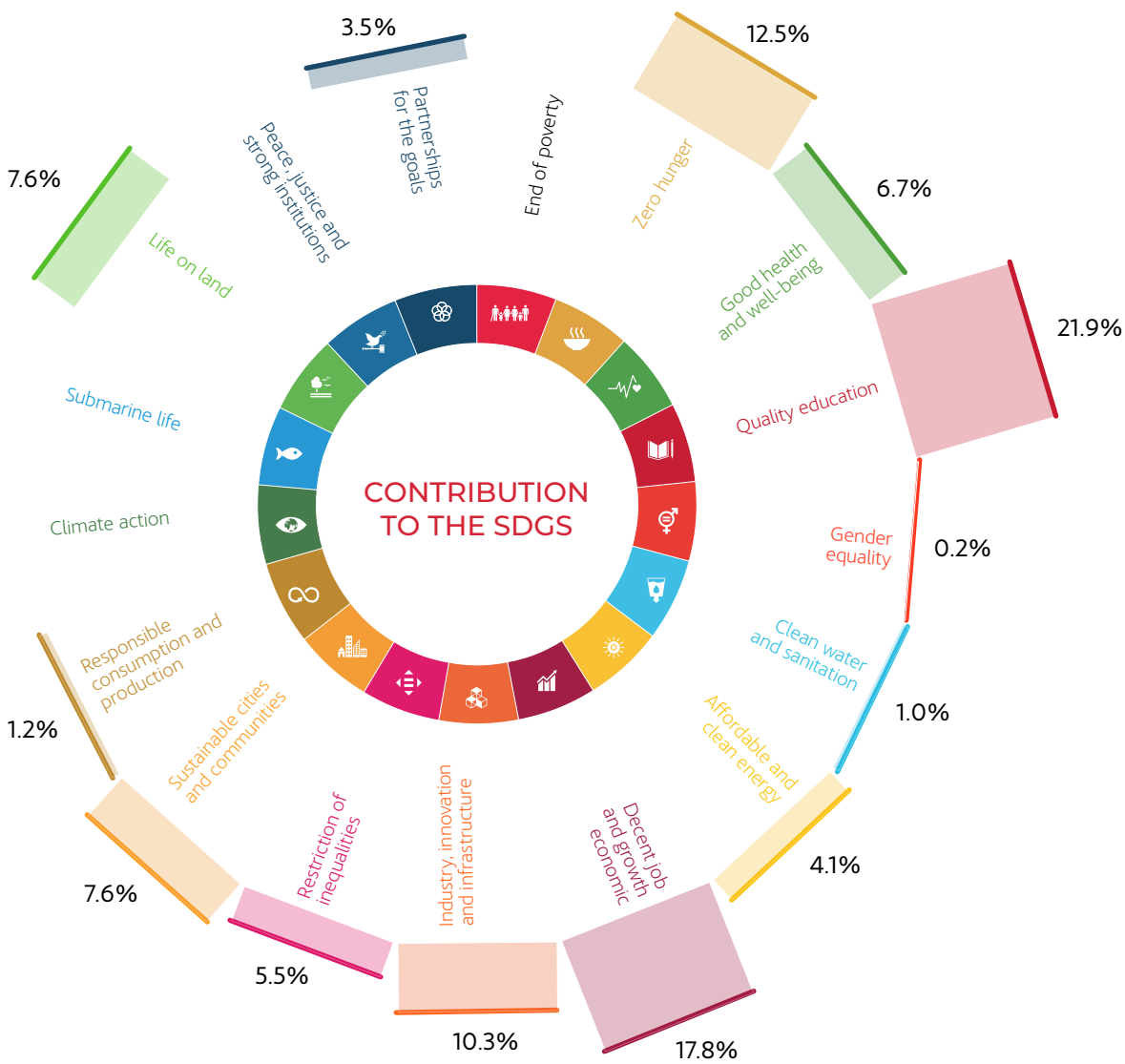
Working towards a more local volunteering

2022 saw the launch of the new Volunteering Programme with the introduction of a corporate volunteering platform providing a forum for participation, raising awareness, and increasing visibility of volunteering activities; it will be implemented in the company's key countries over the coming year.

This new programme promotes the participation of employees, associates and relatives in initiatives driven either by the company or by themselves. The programme is designed to encourage local volunteering and support for the communities where ACCIONA Energía carries out its projects, with a view to increasing positive impact on society and the surrounding environment. The ultimate purpose is to have greater knowledge of the local reality and strengthen the objective of being recognised as valuable players for society.

In this respect, the 2025 Sustainability Master Plan has set the target of reaching 100,000 hours of voluntary work from the ACCIONA Group during that time frame.

→ 2022 SOCIAL CONTRIBUTION OVER €3M (LBG METHODOLOGY BROKEN DOWN INTO SUSTAINABLE DEVELOPMENT GOALS)





The volunteer proposal is divided into three types:

- 01

**RECOGNITION PROGRAMME:**

led by human resources, including programmes nominally intended for employees showing exceptional performance.
- 02

**INSTITUTIONAL VOLUNTEERING:**

development of activities with third-sector organisations (Foundations and NGOs) with which ACCIONA Energía has a relationship of institutional collaboration.
- 03

**PROJECT VOLUNTEERING:**

this takes place in settings where company projects are carried out, in order to respond to local social and environmental needs and maximise the positive impact of the projects on the community.

In 2022 the company put numerous initiatives into effect with the participation of 345 volunteers who have dedicated 1,432 hours to working in the community with very varied targets, amongst which: promoting the path for young unemployed university graduates, together with the Príncipe de Girona Foundation; helping to open up the job market to disabled women, victims of gender violence, with family responsibilities or unemployed people in vulnerable situations, in collaboration with the Integra Foundation or the Quiero Trabajo Foundation.

Various initiatives have also been rolled out in the countries in which ACCIONA Energía is present.

PUT NUMEROUS INITIATIVES INTO EFFECT WITH THE PARTICIPATION OF 345 VOLUNTEERS WHO HAVE DEDICATED 1,432 HOURS.

acciona.org Foundation

- **92,444 people benefited** in Peru, Mexico, Panama, Chile, Philippines and Spain, equivalent to **20,563 homes that have benefited**.
- **1,127 rural and indigenous communities** served in Peru, Mexico, Panama, Chile, Philippines and Spain.
- **37 supply and service centres** run by local microfranchised staff.

acciona.org Foundation

acciona.org, continues expanding its activity in seven countries, and in 2022 provided basic services to different homes, communities and educational centres.

In **Peru**, the initiative brought the Luz en Casa electricity service to 2,117 Amazonian homes in the department of Loreto, and for the first time to the department of Cuzco, where it reached 500 homes in the districts of Echerati, Vilcabamba, Santa Teresa and Huayopata. In addition, the *Agua en Casa* programme implemented pilot systems to carry out technical assessment of the improvement of water quality and management in two communities in the department of Ica. For the work carried out with *Luz en Casa*, acciona.org won the ‘Peru and the SDGs’ Award with *Luz en Casa* in the Prosperity category as an NGO, under the Sustainable Peru initiative, which is backed by the United Nations in Peru, KPMG Peru and *El Comercio* newspaper.

In **Mexico**, its business started in the State of San Luis Potosí with a pilot *Luz en Casa* project which benefits 50 remote rural homes in the Huasteca region. Also in San Luis Potosí, in a partnership between the ACCIONA Services business, BMW and BayWare, a grid-interconnected photovoltaic plant was built to generate savings in the energy expenditure of the educational institution *Colonia Juvenil*, an NGO providing education to more than 100 low-income, young people coming from rural communities in San Luis Potosi.

acciona.org continued its activity in the State of Oaxaca, finalising the first stage of the EncASa Oaxaca programme made renewable electricity, drinking water, proper sanitation and upgraded cooking conditions available to 80 homes, in association with the Madrid Polytechnic University and cofunded by AECID, the Spanish Agency for

International Development Cooperation. It has also established a partnership with the Mexican company Rotoplas to use its rainwater catchment technology, which benefits 25 homes in a first pilot project. At the same time, it has resumed the implementation of the *Luz en Casa* Oaxaca programme with a new enhanced supply model to benefit the most isolated Oaxacan rural homes, which also applies to San Luis Potosí.

In **Panama** acciona.org continued expanding *Luz en Casa* with a further 1,397 homes provided with a basic electricity service in the indigenous region of Ngäbe-Buglé. This work by acciona.org won an award in the 2022 Acknowledgements for Energy Transition from the Panamanian Secretary of Energy, in the Universal Access to Energy category.

In **Chile**, it also focused its activity on extending *Luz en Casa*, through which a further 121 homes in rural communities in the Coquimbo Region have benefited from electricity from renewable sources.

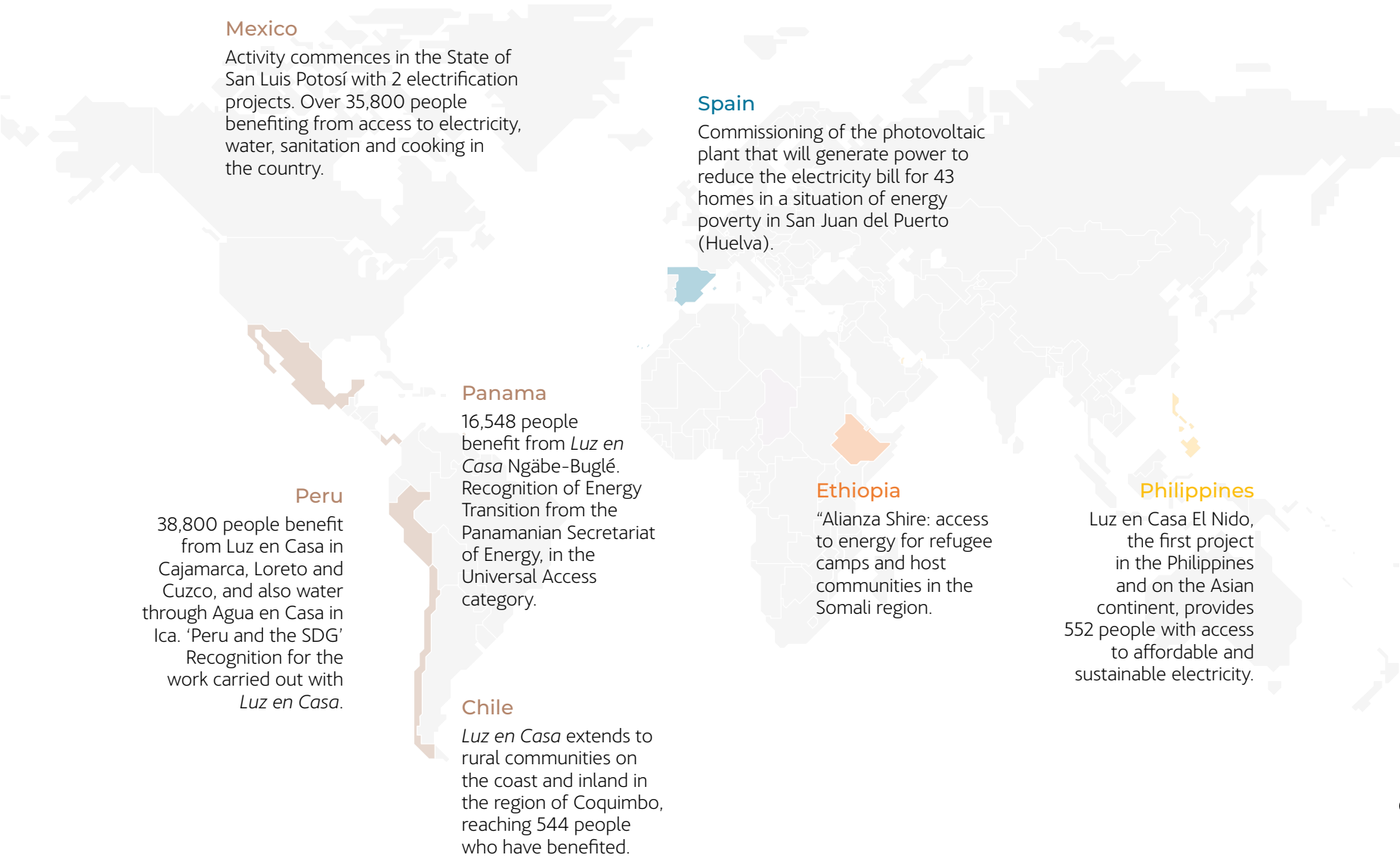
In **Spain**, in association the San Juan del Puerto Town Council (in Huelva), its first photovoltaic plant for collective self-consumption, which will supply electricity so that 43 homes in a situation of energy poverty can reduce their electric bills, and so that 9 public buildings can reduce the municipal carbon footprint.

In the **Philippines**, it inaugurated its first project in the country, Light at Home El Nido, which, in association with the Ayala Foundation, has made affordable, reliable and sustainable electricity service available to 119 homes and 9 community centres in the north of the island of Palawan, previously dependent on diesel-run generators, oil lamps or solar kits insufficient for covering their needs.

In **Ethiopia**, it continued participating in conjunction with AECID, the Polytechnic University of Madrid and other Spanish companies in the project that provides access to a basic home electricity service to the countryside around Dollo Ado and its host communities in the Somali Region.

In 2022 acciona.org has improved the conditions of 20,600 homes to which it has provided access to basic electricity, water and sanitation services that are affordable, reliable and sustainable, benefiting more than 92,400 people. This has been possible thanks to partners, cofinanciers and volunteers, with whom it has been able to collaborate once again on a face-to-face basis after two years of restrictions due to the COVID pandemic.

→ IMPACTS OF ACCIONA.ORG IN 2022





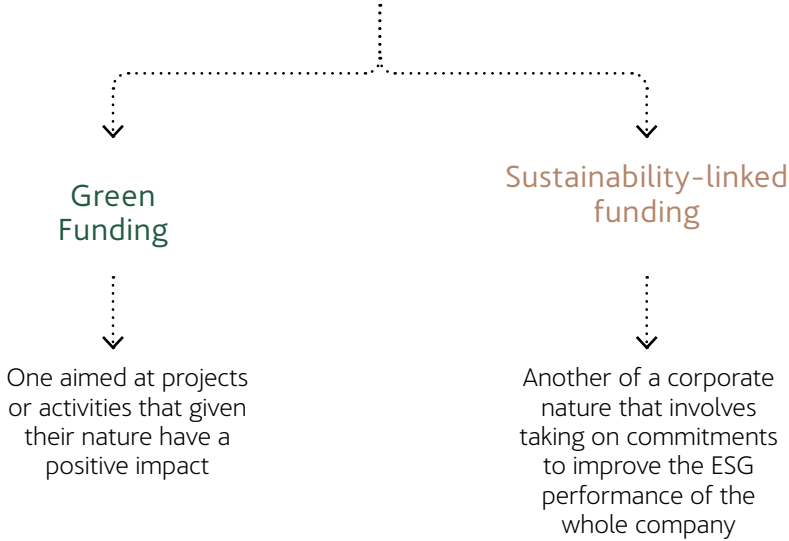
## Sustainable financing

IMPACT MATERIALITY	FINANCIAL MATERIALITY	
OUTCOME OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
Critical	<ul style="list-style-type: none"><li>Loss of the ability to react to the regulatory burden</li></ul>	<ul style="list-style-type: none"><li>Higher revenue due to increased opportunities</li><li>Decrease in operating cost due to green financing</li></ul>

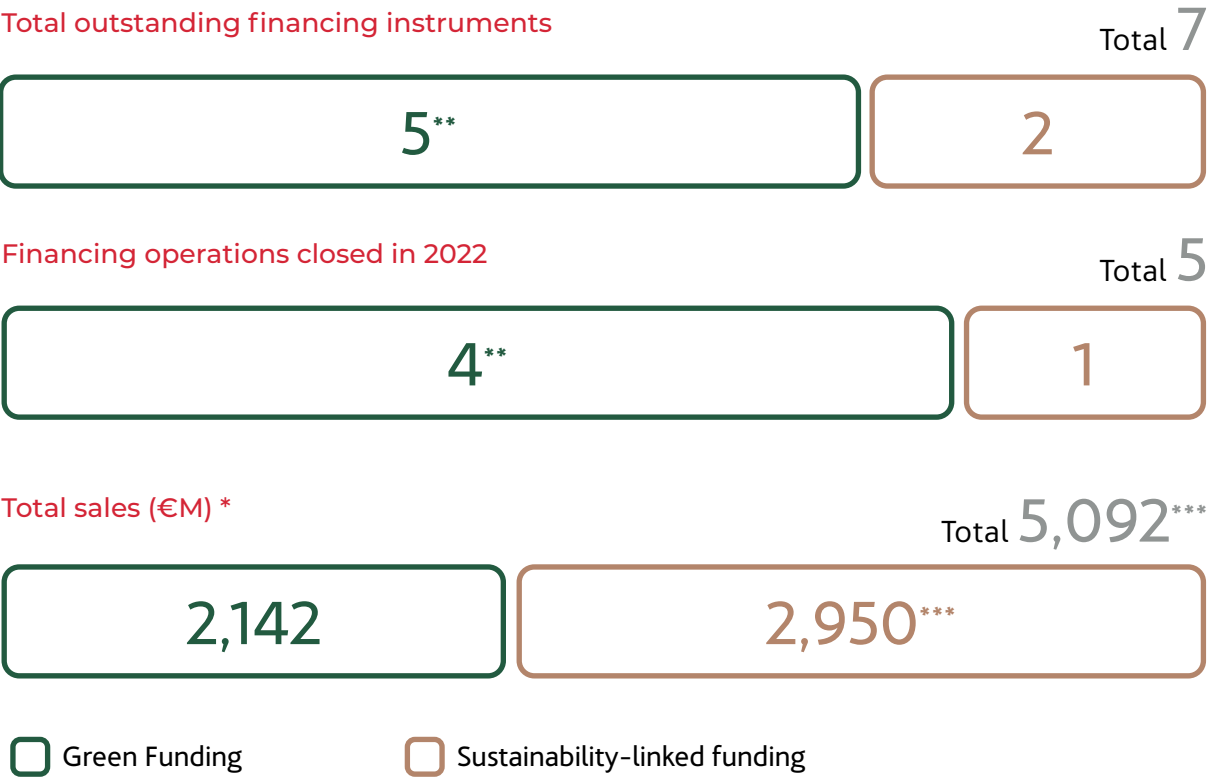
Maximising the capacity of sustainable finances enhances the company's value and the competitive advantage of the regenerative power of its projects. For this reason, ACCIONA Energía promotes innovative solutions for sustainable financing which make it possible to provide these infrastructures with distinctive, clearly beneficial features, taking advantage, at the same time of the interest of the capital markets in financing the existing gaps in the fulfilment of the Sustainable Development Goals.

ACCIONA Energía uses two mechanisms of sustainable financing: one aimed at financing projects in line with taxonomy (green financing or green use of proceeds), and the other for funding general corporate requirements involving undertakings to improve the ESG performance of the whole company (*sustainability-linked financing*).

### → SUSTAINABLE FINANCING OPERATIONS



### → SUSTAINABLE FINANCING OPERATIONS



\*For operations in currency other than the EUR, the amount is considered using the exchange rate in force at the close of 2022.

\*\* Includes "taps"

\*\*\* Includes the principal of the bonds issued and the initial amount of the loans and credit facilities. The outstanding amount at 31/12/2022 corresponds to €2,142 million of green financing and €1,700 million of sustainability-linked financing.

GREEN FINANCING

The ACCIONA group has a Green Financing Framework that includes ACCIONA Energía<sup>19</sup>, whose eligible activities are those in line with the European Taxonomy for Sustainable Activities. The total ACCIONA Energía financing instruments issued within that framework amounts to €2,142 million at 31 December 2022.

The green financing framework was reviewed by Sustainalytics, who gave a second party opinion which confirmed its compliance with the ICMA and LMA Green Bond Principles and the Green Loan Principles.

FINANCING LINKED TO SUSTAINABILITY

ACCIONA Energía receives corporate funding linked to meeting the targets for improving its performance in environmental, social and governance aspects. In its Sustainability-Linked Finance Framework, ACCIONA Energía is currently committed to fulfilling three sustainable performance targets linked to that financing, which initially amounted to €2,950 million, and the outstanding balance of which at 31 December 2022 is €1,700 million.

This year scope of the framework has been extended with a new indicator:

- **KPI 3:** Number of hours of technical and professional training for women and vulnerable and underrepresented minorities. The undertaking is to provide certified technical and professional training to the people in the communities in the area of the projects where ACCIONA Energía operates, with specific attention to vulnerable groups such as women and young people with no professional training and people at risk of social exclusion, in order to improve the quality of life of the communities in the countries in which it operates.

THE CLUB DEAL ARRANGEMENT (CREDIT FACILITY) INVOLVES GIVING 11,811 HOURS OF EDUCATION AND TECHNICAL AND PROFESSIONAL TRAINING FOR WOMEN, VULNERABLE AND UNDER-REPRESENTED MINORITIES.

For funding the MacIntyre project a new indicator has been included in the ACCIONA global framework for sustainable financing:

- **KPI 7:** Number of decarbonisation plans for farmers as part of the MacIntyre wind power project in Australia. This measure is intended as a back-up for an essential sector in the local economy and society, in the transition to a decarbonised economy in line with the objectives of the state of Queensland. Also to reduce the weight of emissions from agriculture and livestock in the state inventory.

VARIOUS SUSTAINABLE FINANCING OPERATIONS AMOUNTING TO AUD\$ 1,378.6 M WHICH WILL INVOLVE IMPLEMENTING DECARBONISATION PLANS FOR A MINIMUM OF 150 LOCAL FARMERS.



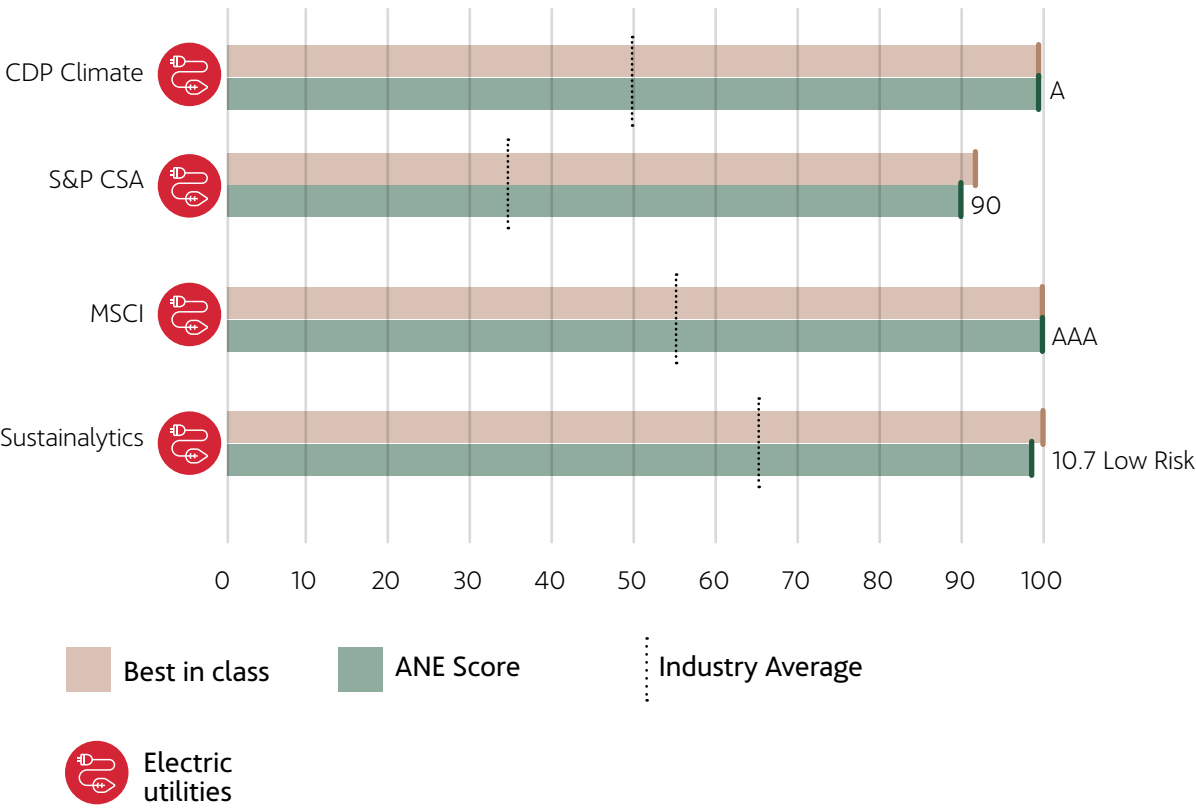
<sup>19</sup> **More information** on green financing instruments and the projects to which they are allocated: [Sustainable Financing ACCIONA Energía](#)



External ESG rating

Different ESG analysts, amongst which MSCI, Sustainalytics, and CP., have analysed ACCIONA Energía for the first time in 2022. ACCIONA Energía has demonstrated unprecedented leadership in the sector where its position stands out as leader in the main ratings.

→ ESG ANALYST RATINGS






ACCIONA ENERGÍA IS PLACED AS THE SECOND BEST COMPANY IN THE ELECTRICITY SECTOR – S&P

ACCIONA Energía, is the most sustainable company in the utilities sector in Spain and the second most sustainable in the world after being analysed through the S&P Global Corporate Sustainability Assessment that evaluates a company's financial, environmental and social performance. ACCIONA Energía obtained a score of 90 out of 100 total points in the questionnaire, and ranks first in the section on environment due to its performance in “operational eco-efficiency” (reduction of contaminating emissions, efficient energy and water consumption, waste management, etc.)

As a result of the score obtained in this assessment, ACCIONA Energía has also be acknowledged in the S&P 2023 Sustainability Yearbook, the purpose of which is to distinguish those companies that stand out within their sectors for the strength and consistency of their corporate sustainability strategy. When preparing this yearbook, S&P assessed over 7,800 international companies from 61 business sectors, selecting the 708 companies showing the best results.

ACCIONA Energía stands among the only six companies from the Electric Utilities sector that made it to the Top 5%, which consolidates its world leadership in sustainability.

→ PRESENCE IN SUSTAINABILITY INDEXES

<div>↘</div> <div>SUPPLIER</div>	<div>↘</div> <div>NAME OF THE INDEX</div>
<div></div>	S&P Global Clean Energy Index
	Solactive Active Net Zero Global Clean Energy Index NTR
	WilderHill Wind Energy Index (USD)
	WilderHill Hydrogen Economy Index (USD)
	Bloomberg World Energy Alternative Source Index
	IBEX 35 ENERGY Index
	Fidelity Clean Energy ESG Tilted Index NR
	Bloomberg World Energy Index
	BI European Pure-Play Renewable Power Generator Valuation Peers
	Bloomberg EMEA Energy-Alternate Sources Index
	Bloomberg Europe 500 Energy Index

→ PRESENCE IN RANKINGS AND OTHER SUSTAINABILITY AWARDS

<div>↘</div> <div>RECOGNITION</div>	<div>↘</div> <div>ORGANISATION</div>	<div>↘</div> <div>POSITION</div>	<div>↘</div> <div>DESCRIPTION</div>
Europe's Climate Leaders 2022	Financial Times	Among the 300 lowest carbon companies	Ranking of companies having reduced the intensity of emissions the most from 2015 to 2020.
ESG Evaluation	S&P Global Ratings	1 <sup>st</sup> in the world	For the second year running, ACCIONA Energía has received the highest rating in the world electricity sector on environment, social and corporate governance issues (ESG) in a cross-sectoral evaluation made by S&P Global Ratings with a score of 87 out of 100 (one point higher than that obtained in 2021).
CDP Climate Change	CDP	Leader (A list)	ACCIONA Energía now forms part of the CDP A List in its first year of responding. List made up of the corporations with the best practices and results in reducing emissions, tackling climate change and aligning their activities with a lowcarbon economy.
New Energy Top 100 Green Utilities	Energy Intelligence	1 <sup>st</sup> utility in the world	For the eighth consecutive year ACCIONA Energía has again validated its position as the world's "greenest" electricity generation company.
EcoVadis Scorecard	EcoVadis	Among the TOP 1%	ACCIONA Energía has maintained its position as leader in its second year of submitting to the EcoVadis assessment, improving on its score and obtaining over 73/100. This achievement has been rewarded with an EcoVadis Platinum Medal. This result places ACCIONA Energía among the top 1% of companies evaluated by EcoVadis.



08

# IMPACT PER REGION

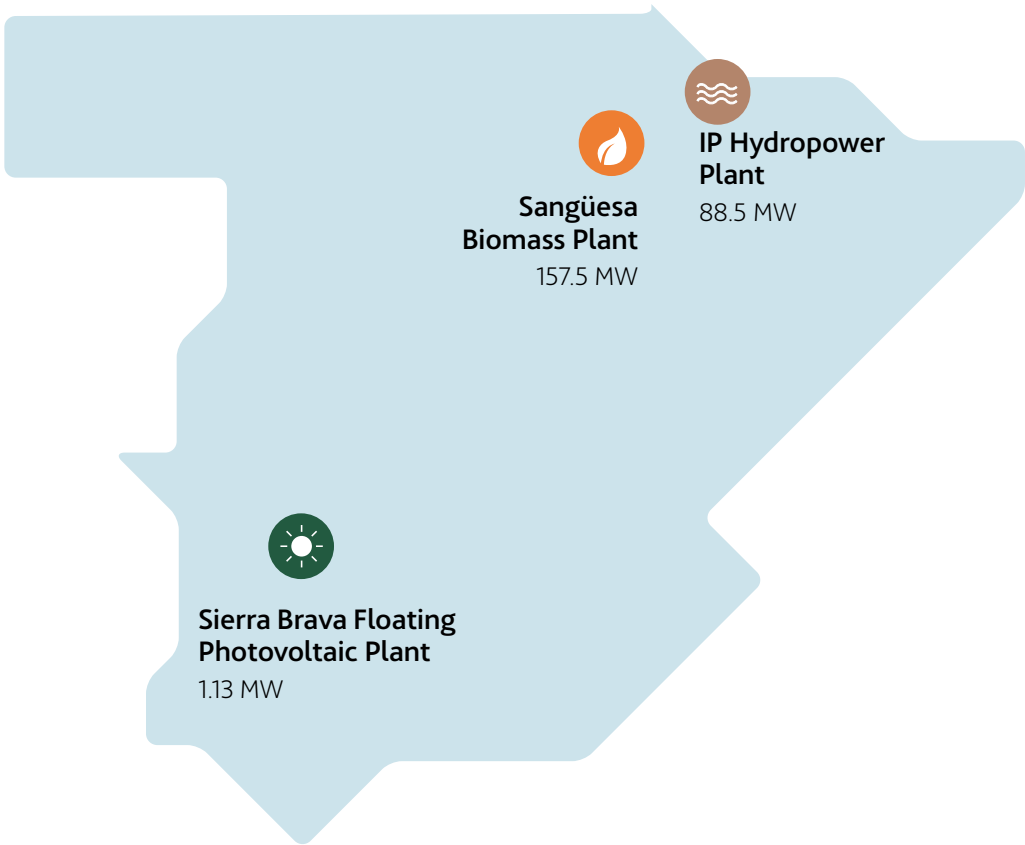
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# EFFECTS OF THE COMPANY’S BUSINESS IN HIGHLIGHTED COUNTRIES

## SPAIN 5,796MW

### NOTEWORTHY PROJECTS IN 2022



### → HIGHLIGHTED INDICATORS

	2020	2021	2022	Variation 2021-2022
ACTIVITY				
Sales (million euros)	1,002	1,502	3,198	113%
Renewable energy production (GWh)	12,486	12,218	11,720	-4%
SOCIAL				
Workforce at year-end	900	925	1,211	31%
Women in management and executive positions (%)	23.3	26.0	27.24	1.24 pb
Accidents: global frequency rate (employees and subcontractors)	0.95	0.67	0.62	- 7%
ENVIRONMENTAL				
Emissions avoided (thousands of tCO <sub>2</sub> e)	5,446	5,373	5,118	-5%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	8.4	5.3	3.9	-26%
Percentage of waste to landfill (%)	4	2	1	-1 pb
Water consumption (thousands of m <sup>3</sup> )	1,003	1,035	974	-6%

The percentage change (%) is calculated using all the decimals

Spain	150	Australia	151	Chile	152	Mexico	153	United States	154
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# AUSTRALIA

## 603MW

### NOTEWORTHY PROJECTS IN 2022



→ HIGHLIGHTED INDICATORS

	2020	2021	2022	Variation 2021-2022
ACTIVITY				
Sales (million euros)	92	59	73	24%
Renewable energy production (GWh)	1,239	1,149	1,075	-6%
SOCIAL				
Workforce at year-end	106	112	165	47%
Women in management and executive positions (%)	18.1	21.0	18.43	-2.57 pb
Accidents: global frequency rate (employees and subcontractors)	0.94	0	0.18	N/A
ENVIRONMENTAL				
Emissions avoided (thousands of tCO <sub>2</sub> e)	979	975	954	-2%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	2	0.01	0.04	300%
Percentage of waste to landfill (%)	10	39	15	-24 pb
Water consumption (thousands of m³)	2.7	1.1	1.3	18%

The percentage change (%) is calculated using all the decimals

Spain	150	Australia	151	Chile	152	Mexico	153	United States	154
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# CHILE

## 922MW

### NOTEWORTHY PROJECTS IN 2022



### → HIGHLIGHTED INDICATORS

	2020	2021	2022	Variation 2021-2022
ACTIVITY				
Sales (million euros)	154	229	262	14%
Renewable energy production (GWh)	1,461	2,085	2,137	2%
SOCIAL				
Workforce at year-end	193	145	171	18%
Women in management and executive positions (%)	11.5	24.2	26.6	2.4 pb
Accidents: global frequency rate (employees and subcontractors)	0.45	0.57	0.29	-49%
ENVIRONMENTAL				
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,072	1,803	1,802	0%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	0.24	0.002	0.02	900%
Percentage of waste to landfill (%)	83	99	100	1 pb
Water consumption (thousands of m³)	13	2,4	2.4	0%

The percentage change (%) is calculated using all the decimals

Spain	150	Australia	151	Chile	152	Mexico	153	United States	154
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## MEXICO

### 1,481MW

#### NOTEWORTHY PROJECTS IN 2022



#### → HIGHLIGHTED INDICATORS

	2020	2021	2022	Variation 2021-2022
ACTIVITY				
Sales (million euros)	173	188	230	22%
Renewable energy production (GWh)	3,528	4,008	3,723	-7%
SOCIAL				
Workforce at year-end*	0	223	269	21%
Women in management and executive positions (%)	19.0	19.4	22.9	3.5 pb
Accidents: global frequency rate (employees and subcontractors)	0.24	0.50	0.13	-74%
ENVIRONMENTAL				
Emissions avoided (thousands of tCO <sub>2</sub> e)	2,022	1,846	1,878	2%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	0.1	0.01	0.02	100%
Percentage of waste to landfill (%)	22	27	20	-7 pb
Water consumption (thousands of m³)	1.7	1.9	2.8	47%

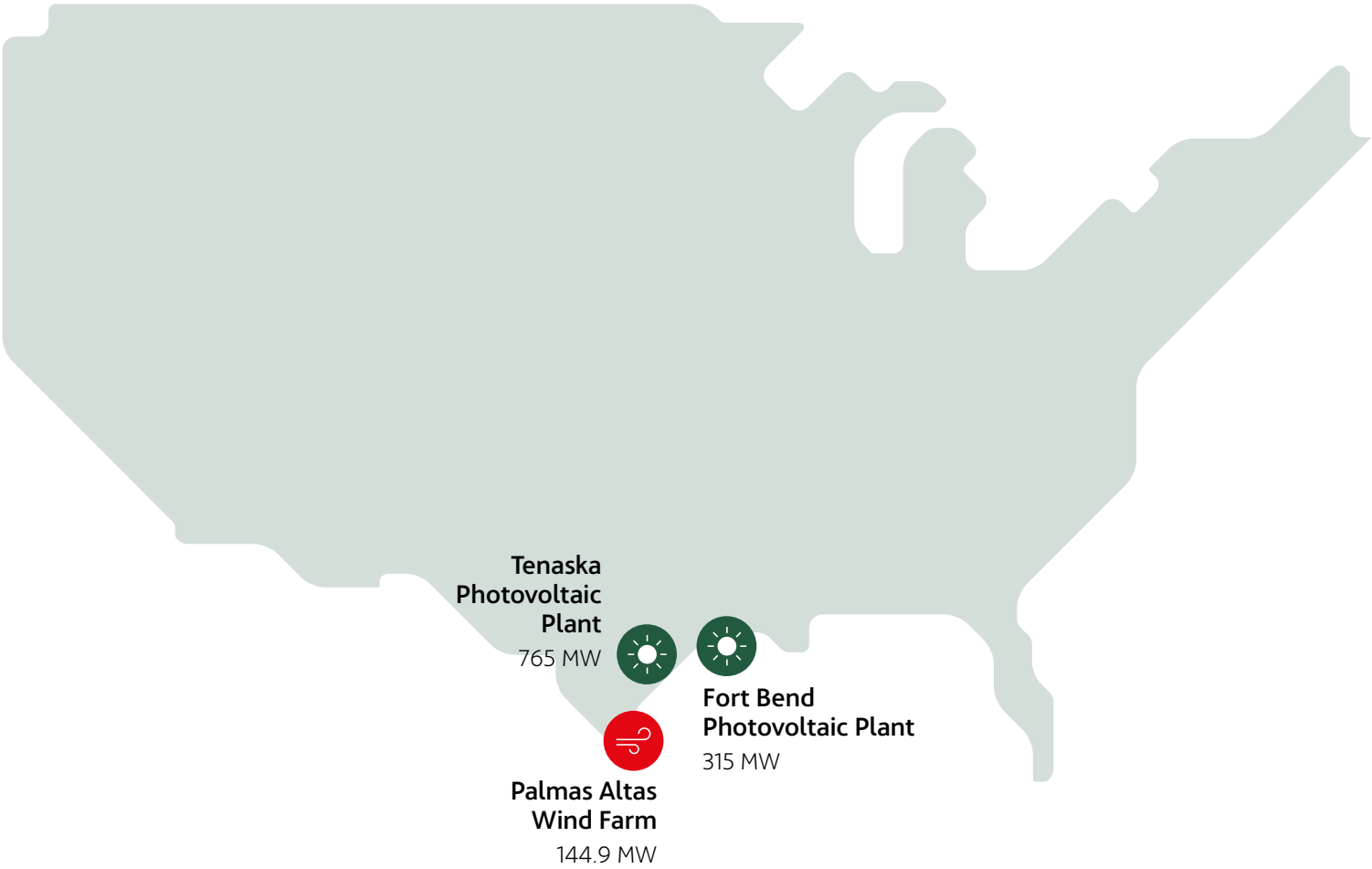
\* Mexico not consolidated in ACCIONA Energía due to service providers in 2019 and 2020. The percentage change (%) is calculated using all the decimals

Spain	150	Australia	151	Chile	152	Mexico	153	United States	154
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# UNITED STATES

## 1,492MW

### NOTEWORTHY PROJECTS IN 2022



### → HIGHLIGHTED INDICATORS

	2020	2021	2022	Variación 2021-2022
ACTIVITY				
Sales (million euros)	71	145	103	-29%
Renewable energy production (GWh)	2,311	1,970	2,160	10%
SOCIAL				
Workforce at year-end	172	178	229	29%
Women in management and executive positions (%)	10.0	15.5	17.3	1.8 pb
Accidents: global frequency rate (employees and subcontractors)	0.86	0.72	0.46	-36%
ENVIRONMENTAL				
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,402	1,134	1,292	14%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	10.2	9.2	5	-46%
Percentage of waste to landfill (%)	32	4	1	-3 pb
Water consumption (thousands of m <sup>3</sup> )	425	395	428	8%

The percentage change (%) is calculated using all the decimals





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# About this report

This Sustainability Report sets out the progress, results and status of ACCIONA Energía’s sustainability performance in 2022, as well as its management approach and the challenges it faces. The object of this Report is to clearly and meticulously provide the most relevant information about the company as it relates to the most significant positive and negative impacts on its different stakeholders.

The report is based on the challenges described in previous year’s sustainability report and focuses on the progress made during 2022. The content has been expressed to serve as the 2022 Statement on Non-Financial Information.

This Report also describes the company’s annual progress in implementing the United Nations Global Compact’s Ten Principles on human rights and labour rights, the environment, anti-corruption, and ACCIONA Energía’s contribution to achieving the Sustainable Development Goals (SDGs) at local level.

The information published in this document is supplemented by other company reports: the *Consolidated Financial Statements and Directors’ Report*, the *Annual Corporate Governance Report* and the *Integrated Report*. The sustainability content is updated regularly on the [ACCIONA Energía website](#).

The company addresses the main sustainability issues that concern its internal and external stakeholders, whether they involve a particular topic or a particular line of activity. The first sections deal with the issues regulated in Law 11/2018, with a structure adapted to the Sustainability Master Plan 2025. Following these chapters, the reader will find the most relevant information on sustainability at national level.

For preparing this report and defining its content, the principles of Relevance and True and Fair View have been complied with, and the comparability, verifiability and comprehension of the information is ensured.

## COMPARABILITY

The Statement of Non-financial Information (*SNFI*) is drawn up yearly and prepared in accordance with the Reporting Principles included in Standard 101 of the Global Reporting Initiative (GRI 2021) on accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

This report has been prepared in accordance with the Global Reporting Initiative standards.

## MATERIALITY AND RELEVANCE

The 2022 Materiality Analysis carried out by ACCIONA Energía in keeping with the principles of GRI Standard 1, has made it possible to identify those economic, environmental and social issues that have the greatest impact on the company’s activities.

As a result of this study, ACCIONA Energía considers that the information contained in this document is relevant for the company and its various stakeholders. The sub-section titled *Materiality Analysis* describes the development process and the methodology used to identify the contents of the document.

## RELIABILITY

To check the reliability of the data and the consistency of the information in response to GRI Standards, the company commissioned an external audit of the Report through the firm KPMG Asesores S.L. As a result of the audit process, this Report contains an *Independent Review Report* detailing the objective and scope of the review, the procedures used and the conclusions reached.

ACCIONA Energía has chosen a reasonable level of review for some indicators.

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Scope

Since 2021 ACCIONA Energía reports the information on its non-financial performance in all its activities, providing an overview for each geographical area where it operates in the Sustainability Report/Statement of Non-financial Information.

The scope of the report comprises all of the group companies<sup>20</sup>, in all their significant aspects, in accordance with the terms of Law 11/2018, of 28 December, on non-financial information and diversity.

Throughout the report, the scope of each one of the indicators shown is specified. Similarly, data from previous years is provided in order to facilitate a better understanding of the evolution of the company’s performance.

The criterion for the consolidation of environmental information is based on the financial control scheme.

ACCIONA PARENT COMPANY

ACCIONA Energía is a subsidiary of ACCIONA S.A. listed on the stock exchange since 2021. The parent company publishes its own *Sustainability Report* in its *annual Directors Report*. Both reports follow the same principles and objectives.

<sup>20</sup> All the companies in the group are listed in Annexes I, II and III of the Consolidated Financial Statements of the company. The group company that meets the requirements set out in article 49.5 of the Code of Commerce is: ACCIONA Generación Renovable S.A.

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## Definition of material topics

The material topics considered this year have been updated taking into account those carried out as infrastructure megatrends expanded upon in the Global Infrastructure Hub’s Infrastructure Futures Report and its crossover with the 2021-2025 Sustainability Master Plan. These topics were complemented with the 10 independent thematic standards for the sector published In November 2022, by the European Financial Reporting Advisory Group (EFRAG).

MATERIAL TOPIC	DESCRIPTION
Mitigation of climate change	The mitigation consists of the company putting actions into effect throughout its value chain to reduce and limit greenhouse gas emissions, with the aim of preventing the global temperature of the planet from continuing to increase.
Adaptation to climate change	This refers to continuing with a regenerative business strategy with solutions aimed at limiting the impacts, reducing the vulnerabilities and increasing man's and nature's resilience to climate change, including biodiversity, forests, coastlines, cities, agriculture, industry, etc.
Depletion of water resources	This refers to the need for appropriate management of water use includes catchment, consumption, treatment and associated effluent in such a way that the total net impact on the water resource is regenerative.
Conservation of biodiversity and ecosystems	The impact management carried out by the company on the conservation of biodiversity and ecosystems comprises measures such as establishing policies, analysing the state of the ecosystems affected, implementing actions for protection and solutions based on nature/ natural climatic solutions. It also includes environmental risk management, the precautionary principle and regulatory compliance.
Circular economy	The circular economy promotes change towards an economy efficient in the use of material resources, taking into account an analysis of the complete life cycle of the products and services associated to the value chain. Proper waste management includes updating policies, research into new uses for waste and how to recycle it.
Development of talent	Strategy and schemes to attract and retain leadership talent, and also to reduce staff turnover, performance assessment procedures, investment in training and instruments for motivating commitment such as scholarships or incentives linked to personal targets and sustainability.
Diversity and working conditions	Measures that guarantee safe employment as well as diversity and equality of opportunity, from hiring people at risk of social exclusion or multiculturalism training. Additionally, actions implemented for overcoming the salary divide are taken into account.

MATERIAL TOPIC	DESCRIPTION
Health and safety	A reduction in occupational accidents and worker and contractor illnesses requires identifying and reducing the risks, and training. A sustainable work environment also includes measures for the organisation of working hours.
Human Rights	Measures introduced to respect the Human Rights of stakeholders and mechanisms to safeguard any possible violations, both in social and labour relationships, including suppliers.
Customers and a fair market	Establishing mechanisms for collecting customer opinions, and thus being able to measure their satisfaction and managing the relationships with them. Ensuring the quality and safety of the products supplied. The fair competition refers to a free market in which all participants operate in equal conditions. Businesses base their competitive practices on price, quality and customer service.
Innovation in industry	Development and implementation of a business model that favours innovation over offer in products and services at all levels, in order to remain at the forefront of the sector.
Transparency and dialogue	The practice of sharing information and opinions between stakeholders on important topics both internally and externally. To this end the company must ensure it has active, efficient channels of communication for the different stakeholders.
Cybersecurity	Digital transformation and cyber-attacks give rise to the need for it security to guarantee the privacy and protection of customers and the strategic data and systems for a company to function.
Supply chain conditions	Social, environmental and ethical criteria are relevant for selecting suppliers. This includes establishing policies, corrective measures in cases of noncompliance, risk assessment and the identification of suppliers' water and carbon footprints. In the renewable energies sector, local procurement and the use of products with positive life cycle footprints are considered relevant.
Development of local communities	A company's activity has a positive repercussion on the local economy, for example by generating wealth, providing jobs and new ecosystems.
Development of sustainable financing	To enhance the processes which take into account environment, social and governance issues (ASG) when making investment decision in the financial sector, which leads to longer term investments in sustainable activities and economic projects having a regenerative impact.
Corporate code of conduct	As part of a company's good governance, an anti-corruption policy and a code of ethics need to be established, in addition to promoting regulatory compliance and integrity in bidding and tenders. Any activity in public policy has to be transparent and relations with third parties must be safeguarded through a due diligence process.
Responsible taxation	Responsible taxation is an open, developmental approach to taxation, which takes into account the interests of all stakeholders: governments, taxpayers and communities. It also considers transparency in the breakdown of tax payments to be relevant for companies with multinational presence.

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Annex of itemized indicators

PRODUCTS AND SERVICES FOR PUBLIC AND PRIVATE-SECTOR CUSTOMERS (GRI 2-6)

PRODUCTS AND SERVICES	PUBLIC CUSTOMERS AND PRIVATE BUSINESS-TO-CONSUMER (B2C) AND BUSINESS-TO-BUSINESS (B2B) CUSTOMERS IN 2021
ENERGY: sale of renewable energy, renewable technology EPC contract and O&M of renewable technology plants and PPA.	<p>Solar Farms: 27,747 private B2C customers.</p> <p>Energy marketing: More than 40 public sector customers and 2,300 private sector B2B customers.</p> <p>PPA: 93 private B2B customers.</p> <p>ESCO: 20 B2B Spain customers; France (Equinov) 15 public sector customers and 378 private sector customers.</p> <p>CECOER: 1 private B2B customer.</p> <p>ACCIONA Recarga: 26,579 registered users and 21 B2B customers (5 public sector and 16 private sector contracts).</p>

DISTRIBUTION OF EMPLOYMENT (GRI 2-7)

→ EVOLUTION OF DISTRIBUTION OF THE WORKFORCE PER CONTRACT TYPE AND GENDER (No. OF EMPLOYEES)

2021					
TEMPORARY			PERMANENT		
MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
53	24	77	1,208	476	1,685
2022					
TEMPORARY			PERMANENT		
MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
63	25	88	1,639	627	2,266

→ EVOLUTION OF THE BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND AGE RANGE (No. OF EMPLOYEES)

	2021				2022			
	< 31	31 to 50	> 50	TOTAL	< 31	31 to 50	> 50	TOTAL
Executives and managers	6	341	93	440	7	429	120	556
Technical staff	198	652	71	921	284	778	79	1,141
Support staff	7	47	15	69	9	61	18	89
Operators	87	206	39	332	138	346	84	569
TOTAL EMPLOYEES	299	1,246	218	1,762	438	1,614	302	2,354

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

→ EVOLUTION OF THE NUMBER OF EMPLOYEES PER CONTRACT TYPE AND AGE RANGE (%)

	2021		2022	
	TEMPORARY	PERMANENT	TEMPORARY	PERMANENT
< 31 years	2.1%	14.8%	1.8%	16.8%
31 to 50 years	1.7%	69.0%	1.4%	67.2%
> 50 years	0.5%	11.8%	0.5%	12.3%

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→ EVOLUTION OF THE NUMBER OF EMPLOYEES PER CONTRACT TYPE AND JOB CLASSIFICATION (%)

GROUPS	2021		2022	
	TEMPORARY	PERMANENT	TEMPORARY	PERMANENT
Executives and managers	0.3%	24.7%	0.3%	23.3%
Technical staff	2.8%	49.5%	2.9%	45.5%
Support staff	0.2%	3.7%	0.1%	3.7%
Operators	1.1%	17.8%	0.5%	23.7%

→ EVOLUTION OF THE GEOGRAPHICAL DISTRIBUTION OF THE WORKFORCE (No. OF EMPLOYEES)

COUNTRIES*	2021			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Spain	629	296	925	852	359	1,211
Mexico	173	51	223	203	66	269
United States	152	26	178	200	29	229
Chile	97	48	145	116	55	171
Australia	75	38	112	112	53	165
Rest of countries	136	42	178	219	91	310
TOTAL EMPLOYEES	1,262	501	1,762	1,703	652	2,354

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

→ BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND TYPE OF WORKING DAY IN 2022 (No. OF EMPLOYEES)

GROUPS*	FULL TIME			PART TIME		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives and managers	411	143	553	1	2	3
Technical staff	750	379	1,129	3	9	12
Support staff	9	76	86	1	2	3
Operators	525	39	565	2	2	4
TOTAL EMPLOYEES	1,695	637	2,333	8	14	22

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

→ BREAKDOWN OF THE WORKFORCE BY JOB CLASSIFICATION AND GENDER (No. OF EMPLOYEES)

GROUPS*	2021			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives and managers	102	338	440	412	144	556
Technical staff	319	602	921	752	388	1,141
Support staff	61	7	68	11	78	89
Operators and employeeer	18	315	333	528	41	569
TOTAL EMPLOYEES	500	1,262	1,762	1,703	652	2,354

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→ BREAKDOWN OF THE WORKFORCE BY AGE RANGE AND FULL/PART TIME STATUS IN 2022 (%)

SECTIONS*	FULL TIME			PART TIME		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
< 31 years	12.8%	5.6%	18.4%	0.1%	0.1%	0.2%
31 to 50 years	49.0%	19.1%	68.0%	0.1%	0.4%	0.5%
> 50 years	10.3%	2.4%	12.6%	0.1%	0.1%	0.2%
TOTAL EMPLOYEES	72%	27.1%	99.1%	0.3%	0.6%	0.9%

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

→ AVERAGE PERMANENT CONTRACTS PER YEAR BY AGE, GENDER AND JOB CLASSIFICATION IN 2022 (No. OF EMPLOYEES)

GROUPS*	MEN				WOMEN			
	< 31	31 to 50	> 50	TOTAL	< 31	31 to 50	> 50	TOTAL
Executives and managers	1	15	0	16	2	36	3	41
Technical staff	43	53	0	96	76	85	5	166
Support staff	3	8	0	11	0	1	0	1
Operators	18	4	0	22	35	37	4	76
TOTAL EMPLOYEES	65	80	0	145	113	159	12	284

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

→ BREAKDOWN OF THE WORKFORCE BY NATIONALITY

NATIONALITY	PERCENTAGE OF THE WORKFORCE (AS A % OF THE TOTAL WORKFORCE)	PROPORTION IN ALL EXECUTIVE POSITIONS (AS A % OF TOTAL EXECUTIVES)
Spanish	51.81%	69.01%
Mexican	11.75%	6.04%
North American	7.53%	3.35%
Chilean	6.89%	5.01%
Australiana	5.26%	3.35%

DISMISSALS (401-1)

→ DISMISSALS BY GENDER AND JOB CLASSIFICATION (No.)

GROUP	2021			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Executives and managers	1	-	1	3	1	4
Technical staff	8	1	9	13	6	19
Support staff	1	4	5	1	1	2
Operators	22	-	22	11	1	12
TOTAL EMPLOYEES	32	5	37	28	9	37

Note: data as of 31/12/2021 for active personnel. Three categories of dismissals are considered for Spain (Dismissals on objective grounds, disciplinary grounds and collective layoffs). For the rest of the world, involuntary resignations, contract terminations and repatriations or deconsolidation are excluded).

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DISMISSALS BY JOB CLASSIFICATION AND AGE RANGE (No.)

GROUP*	2021				2022			
	< de 31	De 31 a 50	> de 50	TOTAL	< de 31	De 31 a 50	> de 50	TOTAL
Executives and managers	-	1	-	1	-	4	-	4
Technical staff	1	7	1	9	2	12	5	19
Support staff	-	5	-	5	-	2	-	2
Operators	5	15	2	22	3	6	3	12
TOTAL EMPLOYEES	6	28	3	37	5	24	8	37

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

NEW HIRES (401-1)

NUMBER OF NEW HIRES BY REGION (No. OF EMPLOYEES)

REGIONS*	MEN	WOMEN	TOTAL
Africa	7	6	13
North America	60	12	72
Asia and Oceania	49	20	69
Central and South America	68	58	126
Europe	8	3	11
Spain	116	60	176
TOTAL	308	159	467

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

NEW HIRES BY AGE GROUP (No.)

SECTIONS*	2022						
	FULL TIME			PART TIME			
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL	TOTAL (full+part time)
< 31 years	119	69	188	0	1	1	189
31 to 50 years	17	1	18	1	0	1	19
> 50 years	170	87	257	1	1	2	259
TOTAL EMPLOYEES	306	157	463	2	2	4	467

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

MATERNITY AND PATERNITY LEAVE (401-3)

EMPLOYEES ENTITLED TO MATERNITY/PATERNITY LEAVE (No. OF EMPLOYEES)

FIGURES*	2021			2022		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Number of employees with the right to maternity/paternity leave	137	4	141	90	18	108
Number of employees who took maternity/paternity leave	137	4	141	90	18	108
Number of employees who returned to work after taking maternity/paternity leave	114	19	133	90	18	108
Number of employees who returned to work after taking maternity/paternity leave and remained in their jobs twelve months after returning to work	114	19	133	90	18	108
RETENTION RATIO**	100%	95%	99.25%	100%	100%	100%

\* The calculation methodology might use figures with decimals that are subsequently rounded off

\*\*The ratio includes the number of employees remaining in their jobs on 31 December 2022 after having taken paternity/maternity leave in 2022 between the number of employees on paternity/maternity leaves that took place in that year.

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TRAINING (404-1)

→ TRAINING RECEIVED PER JOB CLASSIFICATION AND GENDER

TRAINING*	2022					
		DIRECTORS AND MANAGERS	TECHNICAL STAFF	SUPPORT STAFF	OPERATORS	TOTAL
Total number of hours received	Men	23,600.85	39,306.73	374.17	19,195.52	82,477.27
	Women	11,097.20	22,941.68	1,852.77	2,528.43	38,420.08
	Total	34,698.05	62,248.42	2,226.93	21,723.95	120,897.35
Students	Men	435	869	17	817	2,113
	Women	154	447	100	87	782
	Total	589	1,316	117	904	2,895
Training hours per employee/year	Men	57.32	52.24	34.94	36,37	48.44
	Women	76.88	59.11	23.71	61,64	58.96
	Total	60.77	54.02	25.02	37.45	50.52

\* The calculation methodology might use figures with decimals that are subsequently rounded off.

REMUNERATION (405-2)

The average total remuneration for directors who were not executive directors in 2022 was €154,000 for men and €162,000 for women.

Note for the data referring to GRI 405-2 and 2-21: professionals with annual earnings of less than 3,000 euros who could not be annualised are not included in the statistical analysis. Bestinver employees are not included in this table. This does not include people having a business relationship with the company. Only the theoretical salary (fixed + variable target) has been taken into consideration for the analysis, therefore share awards are not considered.

→ TOTAL AVERAGE REMUNERATION BROKEN DOWN BY GENDER, AGE AND JOB CLASSIFICATION (€)






PRODUCTION AND BUSINESS DEVELOPMENT AREAS*		2021			2022		
GENDER	JOB CLASSIFICATION	< 31	31 - 50	> 50	< 31	31 - 50	> 50
Men	Executives and managers	96,606	105,060	138,940	54,576	90,501	136,753
	Technical and qualified staff	44,132	52,541	72,887	46,598	54,197	65,620
	Other personnel	28,120	30,379	42,081	26,535	28,680	32,970
Women	Executives and managers	-	87,484	142,995	-	77,821	143,404
	Technical and qualified staff	34,775	48,129	51,599	39,496	49,862	54,902
	Other personnel	11,903	29,884	36,508	17,429	29,676	35,519
SUPPORT AREAS*		2021			2022		
GENDER	JOB CLASSIFICATION	< 31	31 - 50	> 50	< 31	31 - 50	> 50
Men	Executives and managers	44,000	98,101	108,435	-	95,772	120,533
	Technical and qualified staff	35,985	39,258	68,061	35,726	42,454	83,208
	Other personnel	7,795	15,552	16,488	-	16,017	-
Women	Executives and managers	67,276	95,916	119,495	-	95,609	118,375
	Technical and qualified staff	41,406	43,141	68,915	39,718	45,098	55,483
	Other personnel	40,565	18,393	44,395	-	27,409	-

\* The calculation methodology might use figures with decimals that are subsequently rounded off  
Notes: professionals with annual earnings of less than 3,000 euros who could not be annualised are not included in the statistical analysis.  
It is worth noting the inclusion of the salaries of workers in the 20 countries where ACCIONA Energía does business. The company has defined remuneration policies for each one of the countries where it does business. Therefore, the average aggregate compensation figures for all countries taken together are not representative of the individual wage management policies of each country where ACCIONA Energía operates. This does not include people having a business relationship with the company. Only the theoretical salary (fixed + variable target) has been taken into consideration for the analysis, therefore share awards are not considered.

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(2-21)

→ RATIO BETWEEN HIGHEST WAGE EARNER AND AVERAGE WAGE, BY HIGHLIGHTED COUNTRY

				
AUSTRALIA	CHILE	SPAIN	MEXICO	USA
3.8%	4.8%	16.3%	15.3%	5.6%

The company ratio in 2022 is 15.92%.

→ RATIO BETWEEN THE PERCENTAGE INCREASE OF THE TOTAL ANNUAL COMPENSATION RATE OF THE HIGHEST WAGE EARNER IN THE ORGANISATION AND THE AVERAGE PERCENTAGE INCREASE OF THE AVERAGE WAGE:

				
AUSTRALIA	CHILE	SPAIN	MEXICO	USA
- 23.4%	- 55.9%	30.2%	581.9%	-46.8%

The company ratio in 2022 is -23.76%.

Relevant Environmental Indicators

USE OF WATER (303-3, 303-4, 303-5)

→ EVOLUTION OF THE USE OF WATER

	2019	2020	2021	2022
WATER FOR INTERNAL CONSUMPTION (m³)				
On-site recycled/reused water	0	0	0	0
Recycled water from networks	492,613	490,253	487,073	499,175
Rainwater	484	400	355	358
Municipal drinking water	523,432	477,442*	446,417	482,872
Surface water	482,054	474,708	501,407	423,599
Groundwater	2,724	4,979	2,308	3,451
TOTAL	1,501,308	1,447,781*	1,437,559	1,409,455
DISCHARGE (m³)				
Discharge into the sea	0	0	0	0
Discharge to surface water	311,904	321,077	325,615	312,501
Discharge into the sewer system	13,923	14,572	11,889	13,223
TOTAL	325,826	335,649	337,504	325,724

\* Figures restated after correcting an error in the water consumption for the Nevada Solar One thermosolar plant (U.S.A.). The previous years' figures have been recalculated to include the EROM business line.

In addition to this consumption, ACCIONA Energía carries out water transfer activities. This refers to water that enters and leaves facilities (hydroelectric and biomass plants) without generating any type of consumption and without the quality of the water or the ecosystems being affected in any significant way. For this reason they do not involve any consumption for the company.

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In 2022, the total water transferred in the hydroelectric plants was 16,333,930,879 m³, while water used for cooling in the biomass plant and returned in the same quantity without physical-chemical alterations was 22,871,187 m³.

→ EVOLUTION IN THE USE OF WATER IN AREAS WITH WATER STRESS

	2019	2020	2021	2022
WATER FOR INTERNAL CONSUMPTION (m³)				
On-site recycled/reused water	0	0	0	0
Recycled water from networks	0	0	0	0
Rainwater	19	6	0	0
Municipal drinking water	332	306	321	232
Surface water	0		0	0
Groundwater	1,380	1,757	1,019	900
TOTAL	1,730	2,069	1,340	1,132
DISCHARGE (m³)				
Discharge into the sea	0	0	0	0
Discharge to surface water	0	0	0	40
Discharge into the sewer system	0	38	150	53
TOTAL	0	38	150	93

The previous years' figures have been recalculated to include the EROM business line.

EUROPEAN TAXONOMY OF ENVIRONMENTALLY SUSTAINABLE ECONOMIC ACTIVITIES

The active involvement of financial markets in financing the sustainable economy is indispensable for the European Union’s plans to move towards a low-carbon economy.

The EU taxonomy Regulation (EU Regulation 2020/852) which came into force on 12 July 2020, helps to create the world’s first ‘green list’, a classification system for sustainable economic activities, which will develop a common language for investors and companies when it comes to financing projects or goods and services with a substantial positive impact on the climate and the environment.

Article 8 of the Regulation establishes that any company required to publish non-financial information (under Directive 2013/34/EU), must include information on how and to what extent the company’s activities are related to business dealings that are considered environmentally sustainable.

On 6 July 2021 the Commission Delegated Regulation (EU) 2021/2178 was published which complemented the Regulation (EU) 2020/852, establishing that in 2022 non-financial enterprises must “disclose the proportion of Taxonomy-eligible and Taxonomy non-eligible economic activities in their total turnover, investment in fixed assets and operational expenditure and the qualitative information referred to in Section 1.2. of Annex I relevant for this disclosure”.

The proportion of eligible economic activities according to the taxonomy in 2022 was:

- Business Turnover: 56.42% eligible.
- OpEx: 86.85% eligible.
- CAPEX 98.34% eligible.

In order to determine the proportions shown, on the basis of the financial statements reported by the company, the identification was carried out as per type of activity selecting the figures for each ratio, corresponding to activities identifiable with categories present in the Annexes of the Delegated Regulation (EU) 2021/2139, which defines the technical criteria for establishing when an economic activity is considered to contribute

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substantially to climate change mitigation and adaptation, as well as determining that that activity does not significantly harm any of the other environmental objectives. In the analysis of the sustainable economic activities in ACCIONA, the turnover figures, CapEx and OpEx have been analysed at cost centre level, in all cases taking into consideration the types contained in the Taxonomy Regulation.

Once established, the figures selected were divided into the total figures. For identifying the factors of this calculation, the indications specified in Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, in relation to the international financial accounting standards. In specific:

For business turnover, the figures extracted relate to the definition given in article 2, sub-section 5, of Directive 2013/34/EU. It includes income recognised under International Accounting Standard (IAS) 1, paragraph 82, letter a), adopted by Commission Regulation (EC) no. 1126/2008 (Regulation (EC) nº. 1126/2008 of 3 November 2008, under which certain International Accounting Standard were adopted in accordance with Regulation (EC) no. 1606/2002 of the European Parliament and the Council (DO L 320 of 29.11.2008, p. 1)).

For CapEx, the figures extracted relate to any additions to tangible or intangible assets during the year in question before depreciation, amortisation and any possible new valuations, including those resulting from revaluations and impairment, corresponding to the year in question, excluding any changes in fair value. That figure also includes any additions to tangible or intangible assets resulting from business combinations. The CapEx cover the costs accounted for in accordance with:

- a. IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- b. IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- c. IAS 40 Investment property, paragraph 76, letters a) and b), (for the fair value model);
- d. IAS 40 Investment property, paragraph 79, letter d), points i) and ii), (for the cost model);
- e. IAS 41 Agriculture, paragraph 50, letters b) and e);
- f. IFRS 16 Leases, paragraph 53, letter h).

Any leases that do not result in the recognition of a right to use the asset are not accounted for as CapEx.

For OpEx, the figures extracted relate to uncapitalised direct costs associated to research and development, building renovation measures, short term leases, maintenance and repairs, as well as any other direct expenses related to the daily maintenance of items of property, plant and equipment by the company or by a subcontracted third party and which are necessary for guaranteeing the ongoing effective functioning of those assets. The expense accounts associated to those figures that were used are those related to:

- ST Leases (<12 months)
- Repairs and conservation
- R+D expenses for the year

The company activities identified as eligible in the Annexes for mitigation and adaptation were the following:

- 4.1. Electricity production using solar photovoltaic technology.
- 4.2. Electricity production using concentrated solar power technology.
- 4.3. Electricity production using wind power technology.
- 4.5. Electricity production using hydroelectric power technology.
- 4.8. Electricity production from bioenergy.
- 4.9. Electricity transport and distribution.
- 4.10. Electricity storage.
- 7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).
- 7.6. Installation, maintenance and repair of renewable energy technologies.
- 9.1. Investigation, development and innovation close to the market.
- 9.3. Professional services related to the energy efficiency of buildings.



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Different mechanisms have been implemented to ensure the avoidance of any double accounting. In the first place, observance of the financial accounting standards referred to above makes it possible to guarantee that the figures associated to the same account are not used in two different indicators (this also applies to the accounts indicated for OpEx for which no financial accounting standards are described). Secondly, the figures associated to intercompany elimination lines have been reduced to 0 and their amounts have been charged to the original lines that generated those amounts. Thirdly, no amount that has been attributed to an activity associated to the mitigation of climate change has been taken into consideration for activities associated to adaptation to climate change and vice versa.

Conversely, the taxonomy-aligned percentage of the eligible figure for ACCIONA in 2022 was as follows:

- Business Turnover: 96.58 % of alignment of the eligible figure.
- OpEx: 96.77 % of alignment of the eligible figure.
- CapEx 99.85 % of alignment of the eligible figure.

The criteria mentioned for the case of eligibility have been equally studied for alignment. Furthermore, the assessment of compliance of the criteria established in article 3 of Regulation (EU) 2020/852 and the technical criteria for selection included in the delegated acts relating to climate change adaptation and mitigation objectives is diverse and varies for each of the activities identified. In general terms, the assessments carried out comprised one of the following activities: observing that the activity analysed is in line with the description given in the technical criteria, ascertaining whether the operating parameters of the activity are within the limits established, confirming the existence of internal procedures or tools for ensuring requirements are met, confirming that the activity under assessment is in line with the law.

The following pages show the results of the eligibility and alignment of ACCIONA Energía’s activities with taxonomy. They follow the format of the templates for the key indicators of results of non-financial undertakings under Annex II of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021. For the absolute figures of OpEx and CapEx below the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, for which reason they may differ from the figures presented under the same heading in the company’s financial statements.

In relation to last year’s figures, it is worth pointing out the increase in absolute value of the total figures for turnover, OpEx and CapEx., with no great differences in the activities that consolidate the figures in each of these KPIs; the activity for marketing renewable energy generated by third parties is the main component of the non-eligible figures.

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→ TAXONOMY ALIGNMENTS PER ACTIVITY AND ENVIRONMENTAL OBJECTIVE

TURNOVER

TURNOVER				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")										
BUSINESS ACTIVITIES	Codes	Absolute turnover (€)	Proportion of turnover (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant turnover (%) 2022	Proportion of taxonomy-compliant turnover (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1. SUSTAINABLE ENVIRONMENTAL ACTIVITIES (COMPLYING WITH TAXONOMY)																
Electricity production using solar photovoltaic technology	4.1	106,804,946	2.45%	2.45%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.35%	7.01%		
Electricity production using concentrated solar power technology	4.2	18,100,116	0.42%	0.42%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.74%	0.98%		
Electricity production using wind power technology	4.3	1,890,994,098	43.46%	43.46%	0.00%	Y	Y	Y	Y	Y	Y	Y	77.04%	82.93%		
Electricity production using hydroelectric power technology	4.5	206,505,191	4.75%	4.75%	0.00%	Y	Y	Y	Y	Y	Y	Y	8.41%	4.21%		
Electricity production from bioenergy	4.8	77,797,971	1.79%	1.79%	0.00%	Y	Y	Y	Y	Y	Y	Y	3.17%	3.94%		
Electricity transport and distribution	4.9	330,049	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.01%	0.00%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	7.4	599,710	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.02%	0.00%	F	
Installation, maintenance and repair of renewable energy technology	7.6	1,254,964	0.03%	0.03%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.05%	0.00%	F	

TURNOVER

TURNOVER				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")											
BUSINESS ACTIVITIES	Codes	Absolute turnover (€)	Proportion of turnover (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant turnover (%) 2022	Proportion of taxonomy-compliant turnover (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)	
Professional services related to the energy efficiency of buildings	9.3	68,219,368	1.57%	1.57%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.78%	0.45%	F		
Turnover of environmentally sustainable activities (Taxonomy aligned) (A.1)		2,370,606,413	54.49%	54.49%	0.00%								96.58%	99.53%			
A.2. TAXONOMY-ELIGIBLE ACTIVITIES BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT MEETING TAXONOMY REQUIREMENTS)																	
Electricity production using wind power technology	4.3	23,064,903	0.53%														
Electricity production using hydroelectric power technology	4.5	60,899,403	1.40%														
Turnover of taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) (A.2)		83,964,306	1.93%										3.42%	45.02%			
TOTAL (A.1 + A.2)		2,454,570,719	56.42%										100%	100%			
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																	
Turnover of taxonomy-non-eligible activities (B)		1,896,276,394	43.58%														
TOTAL (A + B)		4,350,847,113	100%														

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ACCIONA Energía has estimated the indicators at consolidated group level in accordance with the provisions of article 8 of the Taxonomy Regulation; however in order to be able to properly reflect the spirit of the EU Taxonomy taking into account the vertical integration of its electricity business, in the preparation of the KPI for turnover, for energy sales made through the Group's marketing company it has considered the need to adopt the criterion of differentiating between the sale of energy generated from different sources and all other services for the availability, maintenance and safety of the supply.

Accordingly, in the KIP numerator for turnover on the table shown in this *Statement of Non-Financial Information*, ACCIONA Energía, has considered sales of energy generated and sold “to the end customer” through the Group's marketing company as being eligible, as they are produced from a renewable energy source and sold through a vertically integrated system.

In this respect, ACCIONA Energía has established the necessary control measures to ensure the correct application of the accounting principles for consolidation when estimating the indicators, in line with the indications proposed in the guidelines for the interpretation and implementation of the Frequently Asked Questions (FAQs) published by the Commission Delegated Regulation (EU) (02/02/22 and 19/12/22) and the ESMA (26/02/21). Specifically in the case of turnover KPI, i) the Group has made the calculation solely using the sales with parties external to the Group (on the assumption of the vertical integration commented above); ii) it has avoided the double-counting of impact in its estimate, iii) and it has ensured that an analysis has been made based on the figure for consolidated Group income without including any internal consumption or other non-eligible additional services.

In this way, the total turnover reported for renewable energy production is equivalent to €2,013 M for wind energy sales, €76 M for Photovoltaic sales, €309 M for Hydraulic energy sales, €96 M for Biomass and thermosolar (€1,857 M for Others), as shown in note 24 – Information per segment, of the consolidated Annual Accounts for 2022.

OpEx

OpEx				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")											
BUSINESS ACTIVITIES	Codes	Absolute OpEx (€)	Proportion of OpEx (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant OpEx (%) 2022	Proportion of taxonomy-compliant OpEx (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)	
A. TAXONOMY-ELIGIBLE ACTIVITIES																	
A.1. SUSTAINABLE ENVIRONMENTAL ACTIVITIES (COMPLYING WITH TAXONOMY)																	
Electricity production using solar photovoltaic technology	4.1	10,169,435	4.98%	4.98%	0.00%	Y	Y	Y	Y	Y	Y	Y	5.73%	7.69%			
Electricity production using concentrated solar power technology	4.2	2,266,534	1.11%	1.11%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.28%	0.67%			
Electricity production using wind power technology	4.3	143,506,388	70.28%	70.28%	0.00%	Y	Y	Y	Y	Y	Y	Y	80.92%	84.26%			
Electricity production using hydroelectric power technology	4.5	10,864,837	5.32%	5.32%	0.00%	Y	Y	Y	Y	Y	Y	Y	6.13%	4.48%			
Electricity production from bioenergy	4.8	2,117,490	1.04%	1.04%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.19%	2.35%			
Electricity transport and distribution	4.9	1,774,329	0.87%	0.87%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.00%	0.00%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	7.4	56,736	0.03%	0.03%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.03%	0.00%	F		
Installation, maintenance and repair of renewable energy technology	7.6	789,041	0.39%	0.39%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.44%	0.00%	F		

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OpEx

OpEx				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")											
BUSINESS ACTIVITIES	Codes	Absolute OpEx (€)	Proportion of OpEx (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant OpEx (%) 2022	Proportion of taxonomy-compliant OpEx (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)	
Professional services related to the energy efficiency of buildings	9.3	68,744	0.03%	0.03%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.04%	0.04%	F		
OpEx for sustainable environmental activities (complying with taxonomy)(A.1)		171,613,535	84.04%	84.04%	0.00%								96.77%	99.50%			
A.2. TAXONOMY-ELIGIBLE ACTIVITIES BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT MEETING TAXONOMY REQUIREMENTS)																	
Electricity production using wind power technology	4.3	2,654,351	1.30%														
Electricity production using hydroelectric power technology	4.5	1,365,794	0.67%														
Investigation, development and innovation close to the market	9.1	1,709,872	0.84%														
OpEx for taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements) (A.2)		5,730,017	2.81%										3.23%	28.95%			
TOTAL (A.1 + A.2)		177,343,552	86.85%										100%	100%			
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																	
OpEx for taxonomy non-eligible activities (B)		26,862,448	13.15%														
TOTAL (A + B)		204,206,000	100%														

CapEx

CapEx				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")											
BUSINESS ACTIVITIES	Codes	Absolute CapEx (€)	Proportion of CapEx (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant CapEx (%) 2022	Proportion of taxonomy-compliant CapEx (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)	
A. TAXONOMY-ELIGIBLE ACTIVITIES																	
A.1. SUSTAINABLE ENVIRONMENTAL ACTIVITIES (COMPLYING WITH TAXONOMY)																	
Electricity production using solar photovoltaic technology	4.1	698,314,803	41.11%	41.11%	0.00%	Y	Y	Y	Y	Y	Y	Y	41.81%	46.85%			
Electricity production using concentrated solar power technology	4.2	45,926,723	2.70%	2.70%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.75%	0.00%			
Electricity production using wind power technology	4.3	568,371,713	33.46%	33.46%	0.00%	Y	Y	Y	Y	Y	Y	Y	34.03%	51.10%			
Electricity production using hydroelectric power technology	4.5	2,582,919	0.15%	0.15%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.15%	0.00%			
Electricity production from bioenergy	4.8	756,297	0.04%	0.04%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.05%	0.00%			
Electricity transport and distribution	4.9	520,677	0.03%	0.03%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.03%	0.00%	F		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings	7.4	3,732,533	0.22%	0.22%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.22%	0.94%	F		
Installation, maintenance and repair of renewable energy technology	7.6	6,942,614	0.41%	0.41%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.42%	0.00%	F		

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CapEx				CRITERIA FOR SUBSTANTIAL CONTRIBUTION		CRITERIA FOR THE ABSENCE OF SIGNIFICANT HARM ("DOES NOT CAUSE SIGNIFICANT HARM")										
BUSINESS ACTIVITIES	Codes	Absolute CapEx (€)	Proportion of CapEx (%)	Migation of climate change (%)	Adapta on to climate change (%)	Migation of climate change (Y/N)	Adapta on to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant CapEx (%) 2022	Proportion of taxonomy-compliant CapEx (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)
Professional services related to the energy efficiency of buildings	9.3	110,612,155	6.51%	6.51%	0.00%	Y	Y	Y	Y	Y	Y	Y	6.62%	1.10%	F	
CapEx for sustainable environmental activities (complying with taxonomy) (A.1)		1,667,898,835	98.19%	98.19%	0.00%								99.85%	100%		

A.2. TAXONOMY-ELIGIBLE ACTIVITIES BUT NOT ENVIRONMENTALLY SUSTAINABLE (ACTIVITIES NOT MEETING TAXONOMY REQUIREMENTS)

Electricity production using wind power technology	4.3	898	0.00%													
Electricity production using hydroelectric power technology	4.5	600,931	0.04%													
Investigation, development and innovation close to the market	9.1	1,904,248	0.11%													
CapEx for taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements) (A.2)		2,506,077	0.15%										0.15%	6.85%		
TOTAL (A.1 + A.2)		1,670,404,913	98.34%										100%	100%		

B. TAXONOMY NON-ELIGIBLE ACTIVITIES

CapEx for taxonomy non-eligible activities (B)		28,234,022	1.66%													
TOTAL (A + B)		1,698,638,935	100%													

In order to comply with the reporting requirements established in the COMMISSION DELEGATED REGULATION (EU) 2021/2178 of 6 July 2021 on reporting the use of debt issued for financing specifically identified taxonomy-aligned activities and the recommendations set out in the European Commission Q&A of 22/02/2022, in 2022 ACCIONA Energía issued its Sustainable financing report for that year, which forms part of the report with the same name of the ACCIONA Group.

In this report, ACCIONA Energía included a breakdown of the green bonds and other debt securities for outstanding green financing operations, and also the information on the returns on its green financing, including the breakdown of assets funded and the beneficial impacts generated by the funding for attaining the targets set out in taxonomy regulations.



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GRI content index

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
GRI 1: FOUNDATION 2022				
GRI 2: GENERAL DISCLOSURES 2022				
2-1	Organisation details	7-13	ACCIONA Energía Private company listed on stock exchanges Av. Europa 10, Alcobendas, Spain	✓
2-2	Entities included in the organisation's sustainability report	Consolidated Financial Statements 2022 (Appendix I, II, III))		✓
2-3	Reporting period, frequency and contact point		2022 (calendar year ending on 31 December) Reporting cycle. Contact point: responsabilidadcorporativa@acciona.es	✓
2-4	Restatements of information	72,73, 75, 76, 81, 82, 164, 165	The metric unit in which the figures appear in the tables has changed from the previous year	✓
2-5	External assurance		All of the information concerning the GRI Standards of this content index has been externally audited	✓
2-6	Activities, value chain and other business relationships	7-13, 121,125,159		✓
2-7	Employees	28, 159-162		✓
2-8	Workers who are not employees	28, 159-162		
2-9	Governance structure and composition	15-16, 93-97 Corporate Governance Report 2022 (Subsections C1.2, C1.3 and C2.1)		✓
2-10	Nomination and selection of the highest governance body	Corporate Governance Report 2022 (Subsection C1.16)		✓
2-11	Chair of the highest governance body	93-97 Corporate Governance Report 2022 (Subsection C1.3)		✓

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
2-12	Highest governance body's role in overseeing the management of impacts	15-16 Corporate Governance Report 2022 (Subsection C2.1)		✓
2-13	Delegation of responsibility for managing impacts	15-16 Corporate Governance Report 2022 (Subsections C1.3 and C2.1)		✓
2-14	Highest governance body's role in sustainability reporting	15-16		✓
2-15	Conflicts of interest	Corporate Governance Report 2022 (Subsection D6)		✓
2-16	Communication of critical concerns	19- 21, 98-104		✓
2-17	Collective knowledge of highest governance body	15 Corporate Governance Report 2022 (Subsection C1.3)		✓
2-18	Evaluation of the performance of the highest governance body	Corporate Governance Report 2022 (Subsection C1.17)		✓
2-19	Remuneration policies	97 Annual Report on Directors' remunerations for the 2022 financial year (Section A)		✓
2-20	Process for determining remuneration	97 Annual Report on Directors' remunerations for the 2022 financial year (Section A)		✓
2-21	Annual total compensation ratio	163-164		✓
2-22	Statement on sustainable development strategy	7-13		✓
2-23	Commitments and policies	16		✓



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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
2-24	Embedding policy commitments	16-18		✓
2-25	Processes to remediate negative impacts	55-62		✓
2-26	Mechanisms for seeking advice and raising concerns	98-104		✓
2-27	Compliance with laws and regulations	98-104		✓
2-28	Membership associations	119-120		✓
2-29	Approach to stakeholder engagement	19,135, 136-140		✓
2-30	Collective bargaining agreements	54		✓
GRI 3: MATERIAL TOPICS 2022				
3-1	Process to determine material topics	19-21		✓
3-2	List of material topics	19-21, 158		✓
DEVELOPMENT OF TALENT				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	28-52		✓
GRI 401: LABOUR 2016				
401-1	New employee hires and employee turnover	34, 46, 162		✓
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	30-33		✓
401-3	Parental leave	162		
GRI 404: TRAINING & EDUCATION 2016				
404-1	Average hours of training per year per employee	52, 163		✓
404-2	Programmes for upgrading employee skills and transition assistance programmes	51-53		✓

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
404-3	Percentage of employees receiving regular performance and career development reviews	29		✓
GRI 202: MARKET PRESENCE 2016				
202-1	Ratios of standard entry level wage by gender compared to local		The average minimum salary is higher than the national minimum wage throughout the company	✓
202-2	Proportion of senior management hired from the local community	161		✓
DIVERSITY AND WORKING CONDITIONS				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	36-42		✓
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016				
405-1	Diversity of governance bodies and employees	36-42, 93, 159-161		✓
405-2	Ratio of basic salary and remuneration of women to men	39-40, 163		✓
HEALTH AND SAFETY				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	46-51		✓
GRI 403: OCCUPATIONAL HEALTH & SAFETY 2018				
403-1	Occupational health and safety management system	46-48, 50-51		✓
403-2	Hazard identification, risk assessment, and incident investigation	46-48		✓
403-3	Occupational health services	50-51		✓
403-4	Worker participation, consultation, and occupational health and safety	48		✓
403-5	Worker training on occupational health and safety	51		✓

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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
403-6	Promotion of worker health	32-33, 50-51		✓
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	46-47, 51		✓
403-8	Workers covered by an occupational health and safety management system	47		✓
403-9	Work-related injuries	48, 50-51		✓
403-10	Work-related ill health	50-51		✓

RESPECTING HUMAN RIGHTS

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	55-62		✓
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GRI 406: NO DISCRIMINATION 2016

406-1	Cases of discrimination and corrective measures undertaken	102-103		✓
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GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016

407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	22-23, 54-62		✓
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GRI 408: CHILD LABOUR 2016

408-1	Operations and suppliers at significant risk for incidents of child labour	22-23, 54-62, 123-124		✓
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GRI 409: FORCED OR COMPULSORY LABOUR 2016

409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	22-23, 54-62, 123-124		✓
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GRI 410: SECURITY PRACTICES 2016

410-1	Security personnel trained in human rights policies or procedures	59, 126-127		✓
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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
GRI 412: EVALUATION OF HUMAN RIGHTS 2016				
412-1	Operations that have been subject to human rights reviews or impact assessments	22-23,54-62, 125-126		✓
412-2	Employee training on human rights policies or procedures	59		✓
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	54-62, 125-126		✓

ADAPTATION TO CLIMATE CHANGE

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	65-76		✓
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MITIGATION OF CLIMATE CHANGE

3-3	Management of material topics	65-76		✓
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GRI 302: ENERGY 2016

302-1	Energy consumption within the organisation	75		✓
302-2	Energy consumption outside of the organisation	76		✓
302-3	Energy intensity	75		✓
302-4	Reduction of energy consumption	69-71		✓
302-5	Reductions in energy requirements of products and services	69-71		✓

GRI 305: EMISSIONS 2016

305-1	Direct (Scope 1) GHG emissions	72-73		✓
305-2	Energy indirect (Scope 2) GHG emissions)	72-73		✓
305-3	Other indirect (Scope 3) GHG emissions	74		✓
305-4	GHG emissions intensity	74		✓
305-5	Reduction of GHG emissions	71-74		✓

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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
305-6	Emissions of ozone-depleting substances (SDG)		Not applicable: ACCIONA Energía does not use ozone-depleting gases in its facilities.	✓
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	74		✓

CONSERVATION OF BIODIVERSITY AND ECOSYSTEMS

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	83-89		✓
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GRI 304: BIODIVERSITY 2016

304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	87		✓
304-2	Significant impacts of activities, products, and services on biodiversity	87-88		✓
304-3	Habitats protected or restored	85-87		✓
304-4	UCN Red List species and national conservation list species with habitats in areas affected by operations	87		✓

DEPLETION OF WATER RESOURCES

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	77-79		✓
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GRI 303: WATER AND EFFLUENTS 2018

303-1	Interactions with water as a shared resource	77-79		✓
303-2	Management of water discharge-related impacts	77-79		✓
303-3	Water withdrawal	78-79, 164-165		✓
303-4	Water discharge	78-79, 164-165		✓
303-5	Water consumption	78-79, 164-165		✓

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
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CIRCULAR ECONOMY

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	79-82		✓
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GRI 306: WASTE 2020

306-1	Waste generation and significant waste-related impacts	82		✓
306-2	Management of significant waste-related impacts	81-82		✓
306-3	Waste generated	82		✓
306-4	Waste diverted from disposal	82		✓
306-5	Waste directed to disposal	82		

GRI 301: MATERIALS 2016

301-1	Materials used by weight or volume	81		✓
301-2	Recycled input materials used	81		✓
301-3	Reclaimed products and their packaging materials	81		✓

ETHICS AND ANTI-CORRUPTION

GRI 3: MATERIAL TOPICS 2022

3-3	Management of material topics	98-105		✓
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GRI 205: ANTICORRUPTION 2016

205-1	Operations assessed for risks related to corruption	98-104		✓
205-2	Communication and training about anticorruption policies and procedures	101-104		✓
205-3	Confirmed incidents of corruption and actions taken	102-103		✓

GRI 415: PUBLIC POLICY 2016

415-1	Political contributions	104-105		✓
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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
GRI 206: ANTI-COMPETITIVE BEHAVIOUR 2016				
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	102-103		✓
CORPORATE GOVERNANCE				
GRI 201: ECONOMIC PERFORMANCE 2016				
201-1	Direct economic value generated and distributed	Consolidated Financial Statements 2022		✓
201-2	Financial implications and other risks and opportunities due to climate change	67-69		✓
201-3	Defined benefit plan obligations and other retirement plans	Consolidated Financial Statements 2022		✓
201-4	Financial assistance received from government	107-108		✓
RESPONSIBLE TAXATION				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	105-108		✓
GRI 207: TAX 2019				
207-1	Approach to tax	105-107		✓
207-2	Tax governance, control and risk management	105-107		✓
207-3	Stakeholder engagement and management concerns related to tax	105-107		✓
207-4	Country-by-country reporting	107	The content required under GRI 207-4.b.v and GRI 207-4.b.vii involves unavailable information. The company will disclose this information in future years.	✓
VALUE CHAIN CONDITIONS				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	121-129		✓

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
GRI 204: PROCUREMENT IMPACTS 2016				
204-1	Proportion of spending on local suppliers	122-123		✓
GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016				
308-1	New suppliers that were screened using environmental criteria	122-126		✓
308-2	Negative environmental impacts in the supply chain and actions taken	122-126		
GRI 308: SUPPLIER SOCIAL ASSESSMENT 2016				
414-1	New suppliers that were screened using social criteria	122-126		✓
414-2	Negative social impacts in the supply chain and actions taken	122-126		✓
CUSTOMERS AND A FAIR MARKET				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	114-118		✓
GRI 416: CUSTOMER HEALTH AND SAFETY 2016				
416-1	Assessment of the health and safety impacts of product and service categories	117		✓
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	117		✓
GRI 417: MARKETING AND LABELLING 2016				
417-1	Requirements for product and service information and labelling	118		✓
417-2	Incidents of non-compliance concerning product and service information and labelling	118		✓
417-3	Incidents of non-compliance concerning marketing communications	118		✓

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GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
CYBERSECURITY				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	108-109		✓
GRI 418: CUSTOMER PRIVACY 2016				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	118		✓
DEVELOPMENT OF LOCAL COMMUNITIES				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	135-141		✓
GRI 203: INDIRECT ECONOMIC IMPACTS 2016				
203-1	Infrastructure investments and services supported	133-134		✓
203-2	Significant indirect economic impacts	23-24,142-144		✓
GRI 413: LOCAL COMMUNITIES 2016				
413-1	Operations with local community engagement, impact assessments, and development programmes	135-140		✓
413-2	Operations with significant actual and potential negative impacts on local communities	135-140		✓
DEVELOPMENT OF SUSTAINABLE FINANCING				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	145-148		✓
INNOVATION IN INDUSTRY				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	109-114		✓

GRI STANDARD	CONTENT	PAGES	DIRECT RESPONSE OR OMISSION	EXTERNAL ASSURANCE
TRANSPARENCY AND DIALOGUE				
GRI 3: MATERIAL TOPICS 2022				
3-3	Management of material topics	120-121		✓

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Law 11/2018 content index

→ QUESTIONS ADDRESSED BY SPANISH LAW 11/2018 ON THE DISCLOSURE OF NON-FINANCIAL AND DIVERSITY INFORMATION: MATERIAL TOPICS FOR ACCIONA AND REPORTING CRITERIA

		SECTION	GRI STANDARDS REPORTING CRITERIA	PAGES
GENERAL TOPICS				
Business Model	Brief description of the group's business model	Only in renewables	GRI 2-6	7-13
	Markets where it operates	Only in renewables	GRI 2-1	7-13
	Organisational objectives and strategies	Only in renewables	GRI 2-6	7-13
	Key factors and trends that could affect the future outlook	Only in renewables Planet Positive	GRI 2-6	10-11; 66-69
General	Reporting framework	About this Report	GRI 1	156-157
Management Approach	Description of applied policies	Sustainability and materiality governance	GRI 2-23 GRI 2-24	15-18
	Results of these policies	Sustainability and materiality governance	GRI 3-3	15-18
	Main risks related to those aspects linked to the group's activities	Sustainability and materiality governance	GRI 2-16	22-23, 69
ENVIRONMENTAL MATTERS				
Environmental Management	Current and foreseeable effects of the business activities on the environment and, where applicable, on health and safety	Planet Positive	GRI 3-3	89-90
	Environmental assessment or certification procedures	Planet Positive	GRI 3-3	89-90
	Resources dedicated to the prevention of environmental risks	Planet Positive	GRI 3-3	89-90
	Application of the precautionary principle	Planet Positive	GRI 3-3	89-90
	Number of provisions and guarantees for environmental risks	Planet Positive	GRI 3-3	90
Pollution	Measures to prevent, reduce or repair carbon emissions	Planet Positive	GRI 305-5	71-74

		SECTION	GRI STANDARDS REPORTING CRITERIA	PAGES
Circular economy and waste prevention and management	Measures for prevention, recycling, reuse, other forms of recovery and disposal	Planet Positive	GRI 306-2 (version 2020)	79
	Actions to combat food waste	Planet Positive	-	See note <sup>21</sup>
Sustainable use of resources	Water usage and water supply according to local constraints	Planet Positive and Annex of itemized indicators	GRI 303-5 (version 2018)	79, 164-165
	Consumption of raw materials and measures taken for more efficient use	Planet Positive	GRI 303-1	78-81
	Direct and indirect energy consumption	Planet Positive	GRI 302-1	75-76
	Measures taken to improve energy efficiency	Planet Positive	GRI 302-4	69, 71-73
Climate change	Use of renewable energies	Planet Positive	GRI 302-1	75-76
	Important elements of greenhouse gas emissions generated as a result of the company's activities	Planet Positive	GRI 305-1 GRI 305-2 GRI 305-3	72-74
	Measures taken to adapt to the consequences of climate change	Planet Positive	GRI 201-2 TCFD <sup>22</sup>	66-69
	Voluntary medium and long-term reduction targets set to reduce greenhouse gas emissions and the measures implemented to that end	Planet Positive	GRI 305-4 GRI 305-5	69, 71-74
Protecting biodiversity	Steps taken to preserve or restore biodiversity	Planet Positive	GRI 304-3	83-89
	Impacts caused by activities or operations in protected areas	Planet Positive	GRI 304-1	87-88

<sup>21</sup> Due to the nature of ACCIONA Energía's business and on the basis of the materiality analysis, the information requested is not useful to its report.  
<sup>22</sup> TCFD: the information on climate change included in the report is consistent in all material aspects with the recommendations made by the "Task-force on Climate-related Financial Disclosures" (TCFD).



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		SECTION	GRI STANDARDS REPORTING CRITERIA	PAGES
SOCIAL AND PERSONNEL-RELATED QUESTIONS				
Employment	Total number and breakdown of employees by country, gender, age, and professional category	People centric and Annex of itemized Indicators	GRI 2-7 GRI 405-1	36, 159-161
	Total number and breakdown of types of employment contracts	Annex of itemized Indicators	GRI 2-7 GRI 405-1	159-161
	Annual average per type of contract (permanent, temporary and part-time) and by gender, age and professional category	Annex of itemized Indicators	GRI 2-7 GRI 405-1	159-161
	Number of terminations by gender, age and professional category	Annex of itemized Indicators	GRI 401-1	161-162
	Gender pay gap	People centric and Annex of itemized Indicators	GRI 405-2	39-40, 163
	Disaggregated average salaries and their evolution by gender, age, professional category or equal value	Annex of itemized Indicators	GRI 405-2	163-164
	Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payments to long-term savings schemes and any other benefits disaggregated by gender	Annex of itemized Indicators	GRI 405-2	163-164
	Implementation of workplace disconnection policies	People centric	GRI 3-3	44
	Employees with disabilities	People centric	GRI 405-1	41
	Working hours organisation	People centric	GRI 3-3	43-45
Organisation of work	Hours of absenteeism	People centric	GRI 403-9 (Version 2018)	45
	Measures intended to promote work-life balance and coresponsible parenting by both parents	People centric and Annex of itemized Indicators	GRI 401-2 GRI 401-3	44-45, 162

		SECTION	GRI STANDARDS REPORTING CRITERIA	PAGES
Health and safety	Health and safety conditions in the workplace	People centric	GRI 403-1 GRI 403-2 GRI 403-3 GRI 403-7 (Version 2018)	46-51
	Workplace accidents, in particular frequency and severity, disaggregated by gender	People centric	GRI 403-9 GRI 403-10 (Version 2018)	48, 51
	Occupational diseases, disaggregated by gender	People centric	GRI 403-9 GRI 403-10 (Version 2018)	50
Labour relations	Dialogue in the workplace, including procedures to inform, consult and negotiate with employees.	People centric	GRI 3-3	60-61
	Percentage of employees covered under collective bargaining agreement, by country	People centric	GRI 2-30	54
	The balance of collective bargaining agreements, particularly in the areas of occupational health and safety	People centric	GRI 403-3	48-54
Training	Training policies implemented	People centric	GRI 404-2	52-53
	Total hours of training per professional category	People centric and Annex of itemized Indicators	GRI 404-1	52, 163
Accessibility	Universal accessibility for people with disabilities	People centric	GRI 3-3	40-42
Equality	Measures taken to promote equal treatment and opportunities for women and men	People centric	GRI 3-3	35-38
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March on effective equality for men and women)	People centric	GRI 3-3	39
	Measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for persons with disabilities	People centric	GRI 3-3	35-42
	Policy against all types of discrimination and, where appropriate, diversity management	People centric	GRI 3-3	35-36, 42

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Human rights	Application of due diligence procedures in the area of human rights, preventing the risk of human rights violations and measures to mitigate, manage and repair possible abuse	People centric	GRI 2-25 GRI 412-1	54-62
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	Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organisation regarding freedom of association and the right to collective bargaining, the elimination of job discrimination, the elimination of forced labour and the effective abolition of child labour	People centric, Exponential Leadership and GRI content index	GRI 406-1 GRI 407-1 GRI 408-1 GRI 409-1	54-62
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# Content index according to the recommendations of the task force on climate-related financial disclosures (TCFD)

ACCIONA Energía follows the TCFD recommendations regarding publication of information relating to climate change in the heading “Climate” of the chapter “Planet Positive”.

AREAS	RECOMMENDED REPORTS	PAGES
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	Describe the board’s oversight of climate-related risks and opportunities.	22-23, 66-67
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	66-69
	Describe the impact of climate-related risks and opportunities on the organisation’s businesses, strategy, and financial planning.	66-69
	Describe the resilience of the organisation’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	66-69
Risk Management	Describe the organisation’s processes for identifying and assessing climate-related risks.	66-67
	Describe the organisation’s processes for managing climate-related risks.	66-67
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation’s overall risk management.	66-67
Metrics and Targets	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	66-69
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	71-74
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	69



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## Independent verification



KPMG Asesores, S.L.  
P.º de la Castellana, 259 C  
28046 Madrid

### Independent Assurance Report on the Sustainability Report of Corporación ACCIONA Energías Renovables, S.A and subsidiaries for 2022

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

To the Shareholders of Corporación ACCIONA Energías Renovables, S.A.:

We have been engaged by Corporación ACCIONA Energías Renovables, S.A. management to perform an assurance review of the accompanying Sustainability Report (hereinafter the Report) of Corporación ACCIONA Energías Renovables, S.A. (hereinafter the Parent) and subsidiaries (hereinafter the Group) for the year ended 31 December 2022, which contains the Group's Consolidated Non-Financial Information Statement (hereinafter, the NFIS) which forms an integral part of the Group's Consolidated Directors' Report for 2022.

#### Scope of our review

The scopes that we applied in our assurance review of the content of the Report are as follows:

- a. We have performed a reasonable assurance review of the preparation and presentation of the indicators included in the Report relative to GRI 301-1, GRI 301-2, GRI 302-1, GRI 302-3, GRI 303-5, GRI 305-1, GRI 305-2, GRI 305-4, GRI 305-7, GRI 306-3, GRI 306-4, GRI 306-5, GRI 405-1 and GRI 403-9, in accordance with the Sustainability Reporting Standards of the Global Reporting Initiative (hereinafter, GRI Standards), as described in the "About this report" Appendix of the Report.
- b. We have performed a limited assurance review of the preparation and presentation of the remaining GRI indicators of the Report, not included in list above, in accordance with GRI standards, as described in the "About this report" Appendix of the Report.
- c. In addition, pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the preparation and presentation of the Group's NFIS for the year ended 31 December 2022, included in the Report, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the "Index of contents of Law 11/2018" of the Report, and in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) regarding information on climate change, and Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (hereinafter, the Regulation (EU)), regarding information on alignment indicators.

The Report 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



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#### Responsibility of the Parent's Directors and Management

The Directors of the Parent are responsible for the content and authorisation for issue of the NFIS included in the Report, which forms an integral part of the Group's consolidated Directors' Report for 2022. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area in the "Index of contents of Law 11/2018" table of the Report and the recommendations of the Task Force on Climate-Related Financial Disclosures (hereinafter, TCFD) regarding information on climate change.

Management of the Parent is responsible for the preparation and presentation of the rest of the content of the Report, prepared in accordance with GRI Standards, based on the content indicated for each subject area in the "GRI Content Index" table of the Report.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the Report is free from material misstatement, whether due to fraud or error.

The Directors of the Parent are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the Report was obtained.

#### Our Independence and Quality Control

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 (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies prevailing international quality standards and accordingly maintains a quality system including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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

#### Our Responsibility

Our responsibility is to express our conclusions in an independent assurance report based on the work performed, and considering the different scopes described in the "Scope of our Review" section of this report.

We conducted our review engagement in accordance with the requirements of the Revised International Standard on Assurance Engagements 3000, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 (Revised)), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines for assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Registered Auditors (ICJCE).

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Review of GRI Indicators with Reasonable Assurance

ISAE 3000 (Revised) requires that we plan and perform our procedures to obtain reasonable assurance on whether the indicators described in point a) of the “Scope of our Review” section of this report, have been prepared and presented, in all material respects, on the basis of GRI standards.

Our reasonable assurance work depends on our professional judgement, including the assessment of the risks of material misstatement of the indicators, whether due to fraud or error.

In making those risk assessments, we have considered internal control relevant to the preparation and presentation of the indicators with reasonable assurance, in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Group’s internal control over the preparation and presentation of the Report.

Our engagement included assessing the alignment of the indicators with the criteria of the GRI standards, understanding how the financial and non-financial information was obtained from source, evaluating the reasonableness of estimates made by the Group, and recalculating the indicators subject to reasonable assurance review.

Reasonable assurance is less than absolute assurance.

Review of Information with Limited Assurance

ISAE 3000 (Revised) requires that we plan and perform our procedures to obtain limited assurance on whether:

- the indicators described in point b) of the “Scope of our Review” section of this report, have been prepared and presented, in all material respects, in accordance with the GRI standards, as described in the “About this report” Appendix of the Report.
- the NFIS referred to in section c) of the “Scope of our Review” section of this report, has been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the “Index of contents of Law 11/2018” of the Report and the TCFD recommendations regarding information on climate change, and Regulation (EU) regarding information on alignment indicators.

The procedures selected depend on our knowledge of the different types of information included in the Report and other circumstances of the engagement, and our consideration of areas where it is probable that material misstatements will arise.

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, and consequently, the level of assurance obtained is substantially lower.

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



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- Meetings with Group personnel to gain an understanding of the business model, the policies and management approaches applied, the main risks related to those questions, as well as of the existence of a sustainability strategy and policies to address the risks and their implementation at all levels of Corporación ACCIONA Energías Renovables, thus obtaining the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the Report based on the materiality analysis performed by the Group and described in the “materiality analysis” section, considering the content required by prevailing mercantile legislation.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the Report for 2022, in accordance with the requirements of GRI standards.
- Review of the management approaches and of the presentation of information on climate risks and its alignment with TCFD recommendations.
- Review of the Regulation (EU) alignment indicators in accordance with the criteria and processes defined by the Parent.
- Analysis of the processes for compiling and validating the data presented in the Report for 2022.
- Corroboration, through sample testing, of the information relative to the content of the Report for 2022 and whether it has been adequately compiled based on data provided by the information sources.
- Perusal of the information included in the Report to determine whether it is consistent with our general knowledge and experience, in relation to the sustainability performance of Corporación ACCIONA Energías Renovables.
- Corroboration of the financial information included in the Report with that contained in the 2022 consolidated annual accounts of Corporación ACCIONA Energías Renovables, audited by independent third parties.
- Review of the reporting process from source for environmental and health and safety information at nine work centres, through remote and in situ visits and reviews, selected based on a risk analysis, and taking into account quantitative and qualitative criteria.
- Procurement of a representation letter from the Directors and management.

Conclusions

Our conclusions are based on, and are 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 conclusions.

Conclusion on GRI Indicators with Reasonable Assurance

In our opinion, the indicators included in the Report relative to GRI 301-1, GRI 301-2, GRI 302-1, GRI 302-3, GRI 303-5, GRI 305-1, GRI 305-2, GRI 305-4, GRI 305-7, GRI 306-3, GRI 306-4, GRI 306-5, GRI 405-1 and GRI 403-9, have been prepared and presented, in all material respects, in accordance with the GRI Standards, as described in the “About this report” Appendix of the Report.

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Conclusion on Information with Limited Assurance

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The indicators described in point b) of the “Scope of our Review” section of this report, and described in the “GRI Content Index” table of the Report, have not been prepared and presented, in all material respects, in accordance with GRI standards, as described in the “About this report” Appendix of the Report.
- b) The NFIS of Corporación ACCIONA Energías Renovables, S.A. and its subsidiaries for the year ended 31 December 2022, has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the “Index of contents of Law 11/2018” of the Report, the TCFD recommendations regarding information on climate change, and Regulation (EU) regarding information on alignment indicators.

Emphasis of Matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment stipulates the obligation to disclose information on how and to what extent the undertaking’s activities are associated with economic activities that qualify as environmentally sustainable and are aligned with climate change mitigation and climate change adaptation. The Directors of Corporación ACCIONA Energías Renovables, S.A. have included information on the criteria that, in their opinion, best allow them to comply with the aforementioned obligations, which are defined in the “European taxonomy of environmentally sustainable economic activities” Appendix of the accompanying Report. Our conclusion is not modified in respect of this matter.

Use and Distribution

In accordance with the terms of our engagement letter, this report has been prepared for Corporación ACCIONA Energías Renovables, S.A. in relation to its 2022 Sustainability Report and for no other purpose or in any other context.

In relation to the Consolidated NFIS, this report has been prepared in response to the requirement established in prevailing mercantile legislation in Spain, and thus may not be suitable for other purposes and jurisdictions.

KPMG Asesores, S.L.

(Signed on original in Spanish)

Patricia Reverter Guillot  
27 February 2023



## SUSTAINABILITY REPORT 2022