

GOVERNANCE

SUSTAINABLE TRANSFORMATIVE INNOVATION

AUTHENTICITY

TRANSPARENCY




SUPPLY CHAIN

EXPONENTIAL LEADERSHIP

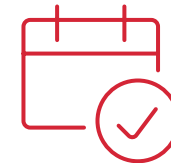


WE PURSUE A PURPOSE

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

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

KEY MILESTONES 2022



Obtained the UNE 19601 standard for Tax Compliance and created the Tax Compliance Body.

Took part in the international debate on climate, in the COP 27 and in associations such as CLG Europe and WBCSD.

Approved the new corporate mission: *We challenge the present to make the future possible.*

93.7% of contracts with local suppliers.

Expand the corporate reports adding to the current ones some specific ones on Human Rights and Diversity.

Consolidate an ESG budget with key indicators that range from people and the environment to environmental impact management.

Disseminated the new corporate mission through campaigns and courses for employees.

Continue to deploy the Enhancement of the Supplier Risk Map through the new SCRM methodology, which means that 60% of suppliers will have ESG assessment, monitoring and improvement plans.

MAIN CHALLENGES

2023



Governance

CORPORATE GOVERNANCE

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

→ GOVERNMENT STRUCTURE AT ACCIONA

↘ ANNUAL GENERAL MEETING

↘ BOARD OF DIRECTORS

Audit and Sustainability Committee
 Appointments and Remunerations Committee

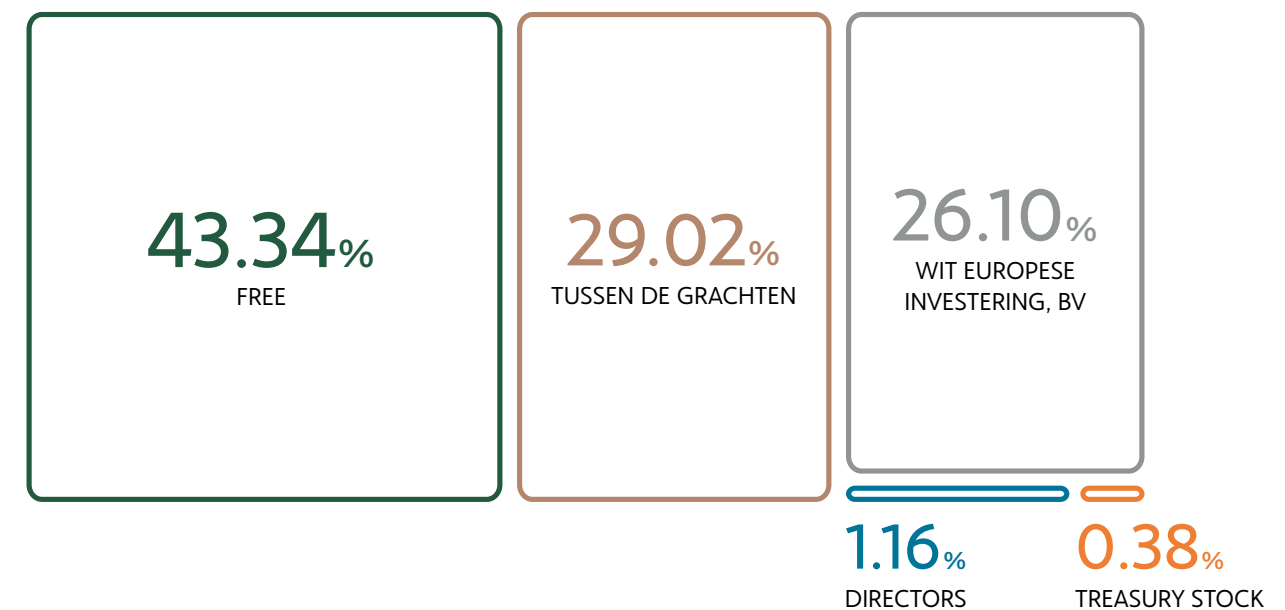
↘ MANAGEMENT TEAM



Shareholders and the Annual General Meeting

At the time of this report, the share capital of the parent company was represented by 54,856,653 ordinary shares registered by book-entry securities, each with a par value of 1 euro, fully subscribed and paid up.

→ SHAREHOLDINGS AS OF THE DATE OF PREPARATION OF THIS REPORT



The company's Articles of Association do not contain any restrictions or a maximum limit on shareholders' voting rights. Nor are there any limitations by law or the Articles of Association on the acquisition or transfer of shares, without prejudice to the pre-emptive acquisition rights, which are reciprocally granted to two significant shareholders declared to the company pursuant to the shareholder agreement notified to the CNMV (the Spanish National Securities Market Commission) by means of material event number 147,698, duly registered with the Companies House.

ACCIONA sets up an online shareholders' forum prior to the Annual General Meeting (AGM) in order to guarantee and facilitate communications with all shareholders, including minority shareholders, pursuant to the terms of the Spanish Capital Companies Law. Here shareholders can put forward motions they wish to add to the agenda announced in the call notice of the Annual General Meeting, applications to support said motions, initiatives aimed at achieving a sufficient percentage to exercise a minority right provided for by law, and offers and requests for voluntary representation. ACCIONA also establishes permanent channels of communication with its shareholders and investors through its Investor Relations department.

In addition, ACCIONA makes available to shareholders, in connection with the call notice of the AGM, and on its website, a system for remote online or mail-in voting in order to facilitate the exercise of voting rights. The Annual General Meeting held in 2022 was held physically and virtually to facilitate participation and attendance by shareholders or their proxies during the meeting, allowing them to ask questions or express their opinions and exercise their voting rights on the different items on the agenda.

→ **AT THE ANNUAL GENERAL MEETING HELD ON 23 JUNE 2022, VARIOUS MATTERS WERE DISCUSSED, INCLUDING THE FOLLOWING:**

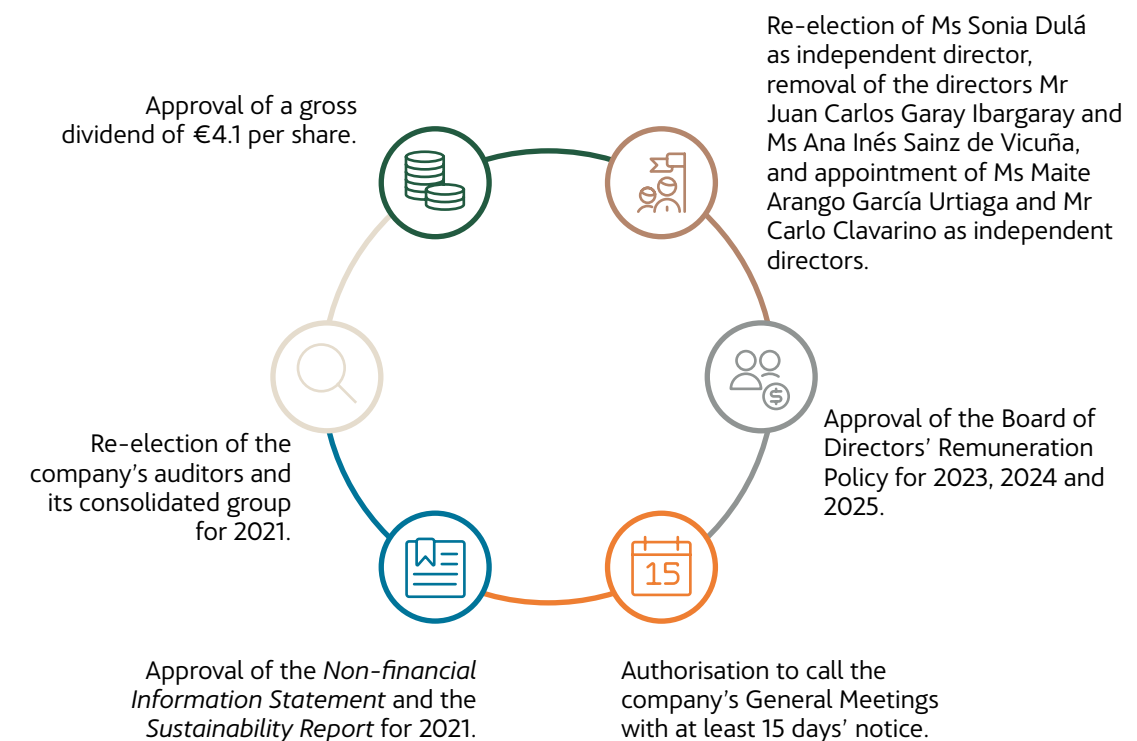
WHAT IS THE USEFULNESS OF THE ELECTRONIC SHAREHOLDER FORUM?

Put forward motions they wish to add to the agenda announced in the call notice of the Annual General Meeting.

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

Applications to support said motions.

Offers and requests for voluntary representation.

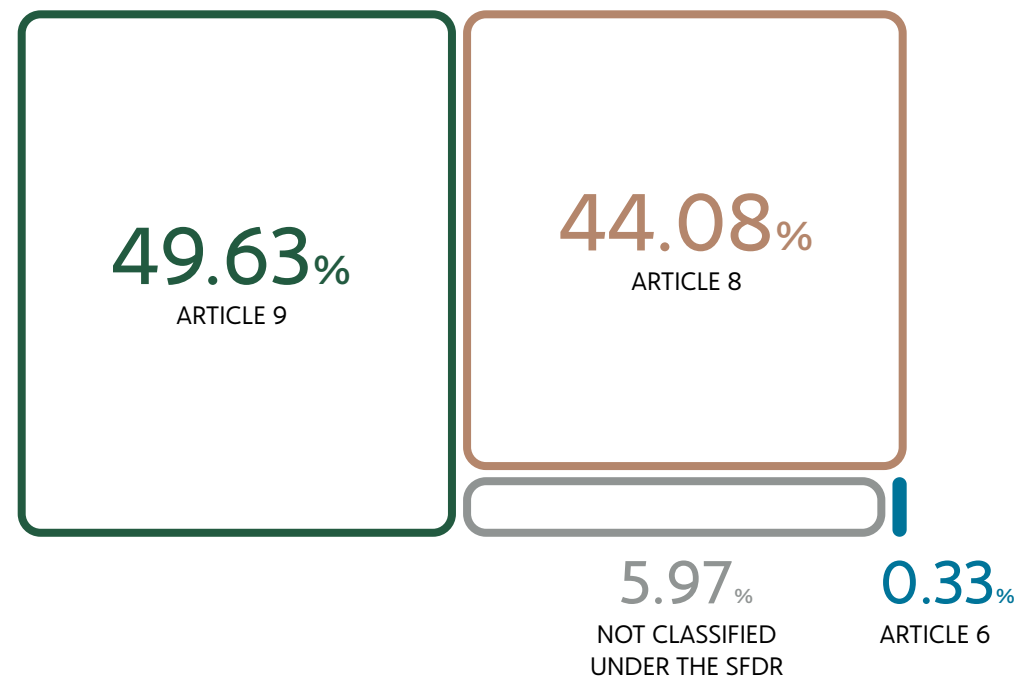


All resolutions were approved with the vote in favour of at least **82.45%** of the voting capital in attendance at the AGM.

ESG funds in the shareholding according to the new SFDR regulation

Out of ACCIONA'S total Free-Float Market Cap, 20% belongs to funds with ESG attributes, which shows the investors' trust in the company's sustainable strategy. Half of these ESG funds are classified under Article 9 of SFDR, the strictest classification. This is defined as a "Fund that has sustainable investment as its objective or a reduction in carbon emissions as its objective".

→ ESG FUNDS IN THE SHAREHOLDING ACCORDING TO THE SFDR CLASSIFICATION



As the regulation on the classification of ESG Funds is developed, ACCIONA collaborates actively with investors to provide the information required on the Principal Adverse Impacts (PAI) with a view to providing full transparency.

Board of Directors

The Board of Directors is the highest management and representative body, with the exception of certain matters that are reserved to the Annual General Meeting. It is made up 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 with integrity and transparency in the most efficient and effective way.

It is ACCIONA's Board of Directors' mission to carry out its functions with a shared purpose and independent criteria, treat all shareholders in the same position as equals and act in the company's interest, understood as achieving a profitable and sustainable business in the long run that will promote its continuity and maximise the company's financial value.

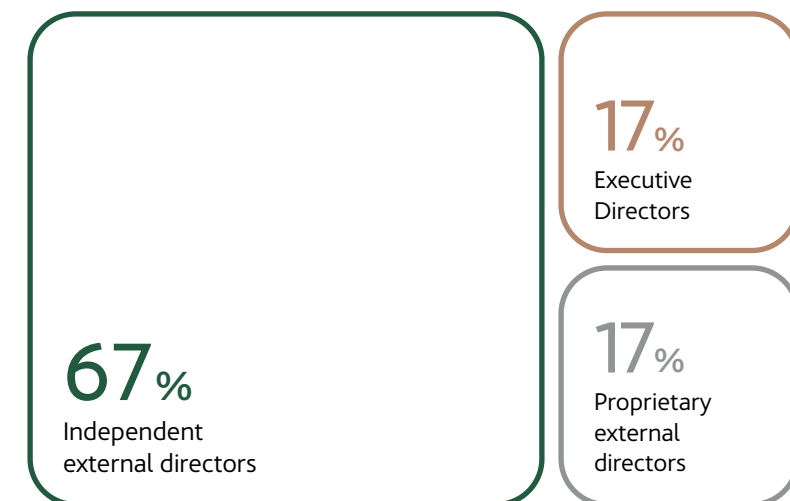
The Board of Directors' Composition Policy includes a new gender representation goal provided for in the recommendations of the Code of Good Corporate Governance of Listed Companies.

The Policy stipulates that the Board members will remain in office for three years and may be re-elected once or several times. ACCIONA's Board of Directors comprises twelve members:

- Ten are external. Of these, eight are independent directors and two are proprietary directors.
- Two of the twelve members are executive directors.

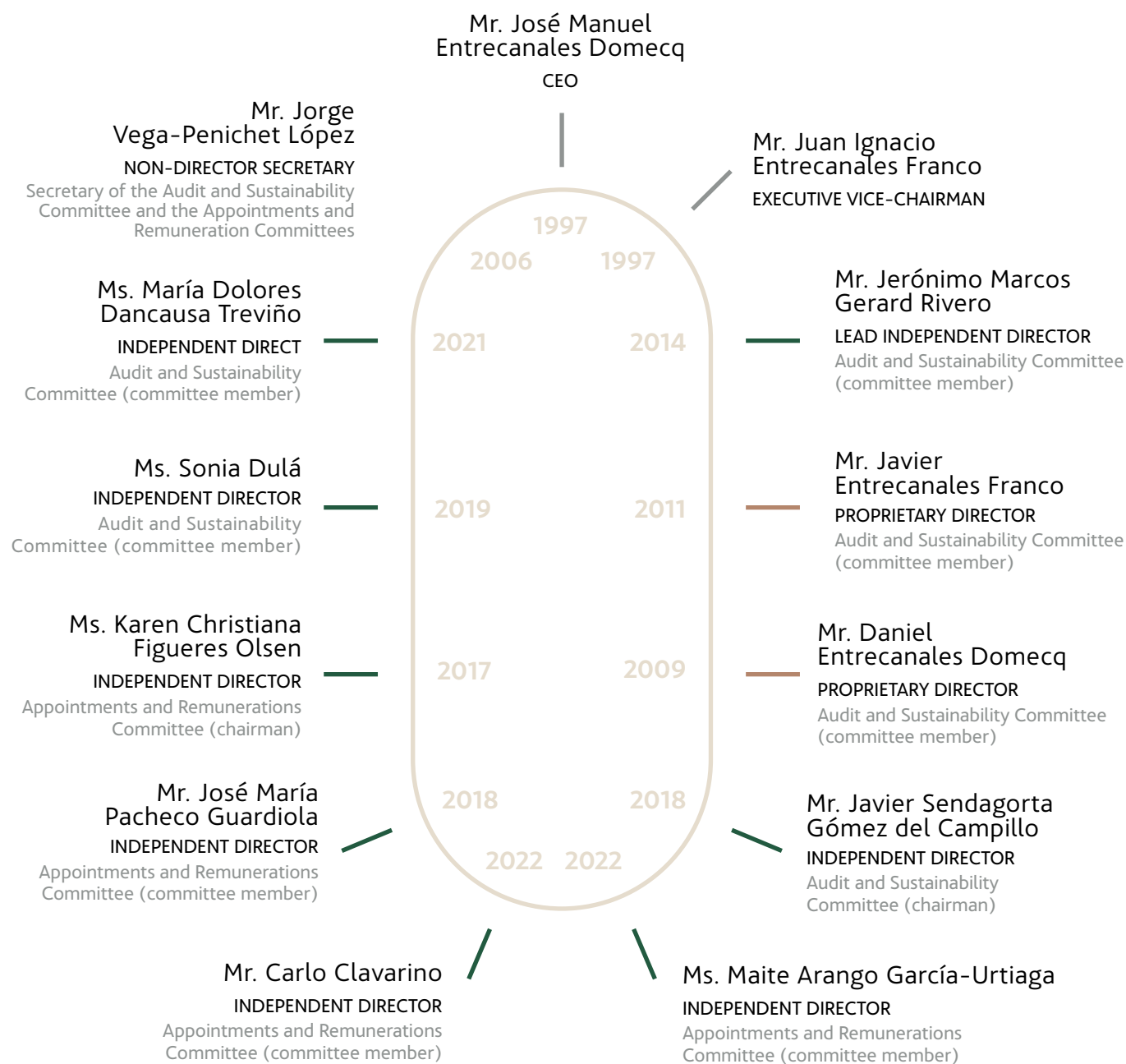
→ COMPOSITION OF THE BOARD ACCORDING TO THE NATURE OF THE POSITION

THE BOARD OF DIRECTOR'S AIM IS TO PROMOTE SOCIAL INTEREST REPRESENTING THE COMPANY



ACCIONA has a Board of Directors' Composition Policy that aims for greater gender parity in its governing body. In this regard, the percentage of female directors on the Board of Directors was 33.3% by the end of 2022.

→ BOARD OF DIRECTORS AS 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	100%	100%	95%
No. meetings	10	9	4

THE BOARD OF DIRECTORS HAS A "SECURE PORTAL"

In order to respond to current needs, the Board of Directors has a "secure portal" for Directors that allows members to access the information and encourages communication between Directors and the Secretary, while at all times guaranteeing confidentiality, in addition to being able to hold virtual meetings in a safe and accessible environment.

Every year, the Board of Directors evaluates its operation based on diverse criteria, including its performance and individual contributions, as well as the diversity of its composition and competencies. The evaluation of the functions and positions of the members, Chairman, Vice-Chairman of the Board and Lead Independent Director, and Chairpersons of the committees, is based on the reports submitted by the Audit and Sustainability Committee and the Appointments and Remuneration Committee. The assessment of the performance of the committees and their members 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 and Sustainability Committee and the Appointments and Remuneration Committee analyse the results and refer the corresponding reports and proposals to the Board of Directors. The Board determines the areas of improvement and oversees their subsequent implementation.

In compliance with recommendation 36 of the Good Governance Code of Listed Companies, ACCIONA conducts evaluations with the support of external consultants every three years. The last one was in 2022 for 2021, when the Appointments and Remuneration Committee appointed an external consultant to take care of the assessment. Furthermore, as an additional evaluation measure, the committee Regulations set forth that they must carry out an annual self-evaluation.

The Board of Directors has a Lead Independent Director. The Regulations of the Board of Directors, in compliance with Best Corporate Governance Practices established in the Good Governance Code of Listed Companies and the Spanish Capital Companies Law, assigns the following functions to the Lead Independent Director.

THE AUDIT AND SUSTAINABILITY COMMITTEE IS MADE UP OF FIVE MEMBERS

The Board of Directors agreed in 2021 to join the Audit Committee and the Sustainability Committee as a single Audit and Sustainability Committee, as a manifestation of the company's commitment in terms of sustainability and its close link to the financial activity and ordinary management of the company.

This body is made up of five members, all of them external, being four of them independent, with expertise on accounting, auditing, internal controls, risk management – financial and non-financial– and on economic, financial, corporate and ESG affairs.

FUNCTIONS TO THE LEAD INDEPENDENT DIRECTOR

- 01 Chair the Board of Directors in the absence of the Chairman and the Vice-Chairmen, if there is one.
- 02 Coordinate and meet with non-executive directors. Voice their concerns.
- 03 Maintain contacts with investors and shareholders to ascertain their views and concerns, particularly in relation to the corporate governance of the company.
- 04 Direct the Board of Directors' assessment of the Chairman.
- 05 Coordinate the Chairman's succession plan.
- 06 Request the scheduling of the Board of Directors meeting or the inclusion of new items on the agenda of a meeting already convened.

Management Team

The [Management Team](#) is made up of more than 50 professionals in Spain and abroad, from different departments and areas of expertise. The company reports to the CNMV and publicly announces the members of the Management Team who have roles with managerial responsibilities in accordance with the provisions of Regulation (EU) No 596/2014 on market abuse.

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

Remunerations Policy

During the year, the company has been governed by the [Remuneration Policy](#) in force that is available on the company's website.



COMPANY REMUNERATION POLICY

The company's remunerations policy, including the one 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.








In addition to the above, the company has a *2020-2029 Long-term Incentive Plan linked to the Creation of Value aimed at the Executive Directors of ACCIONA, S.A.* -or the 2020 LTIP- which intends to align remuneration with the company's long-term objectives and interests. The 2020 LTIP is under a multiannual framework 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.

The *Annual Report on Directors' Remuneration*, approved by the Board of Directors, includes the information on the effective application of the remuneration policy for its members and details the consideration received by each director.



ETHICS AND ANTI-CORRUPTION

→ ETHICS AND ANTI-CORRUPTION (BUSINESS CONDUCT)

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden • Loss of market share 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Higher operating costs • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden • Higher asset valuation
	Important	<ul style="list-style-type: none"> • Higher raw material costs • Bigger regulatory burden • Higher asset valuation 	<ul style="list-style-type: none"> • Higher asset valuation • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden

ACCIONA MEDIA: IMPORTANT

Fight against corruption, bribery and money laundering

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

01

Anti-Corruption Policy

Approved in 2013 and revised in 2018, this policy establishes the group's clear and explicit position against any corrupt or criminal act, which extends to all persons who are part of the company in their professional performance.

02

Crime Prevention and Anti-Bribery Policy

Approved by the Board of Directors in 2018, it reinforces the group's commitment to zero tolerance of illegal activities, through permanent monitoring measures for prevention and detection, effective communication and awareness mechanisms for all employees and a business culture based on ethics and compliance.

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 including: donations and sponsorships, selecting partners and hiring business consultants, interacting with public officials, gifts and hospitality, international trade sanctions, antitrust compliance, prevention and management of conflicts of interest, recruitment and ACCIONA Bonus.

THE ANTI-CORRUPTION GUIDELINES
PROVIDE SPECIFIC GUIDELINES TO AVOID
IMPROPER CONDUCT AND ARE APPLICABLE
AND MANDATORY FOR EACH AND EVERY
EMPLOYEE AND ALL STAKEHOLDERS
INVOLVED WITH ACCIONA.

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

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

Organisation and management model to prevent crimes and corruption

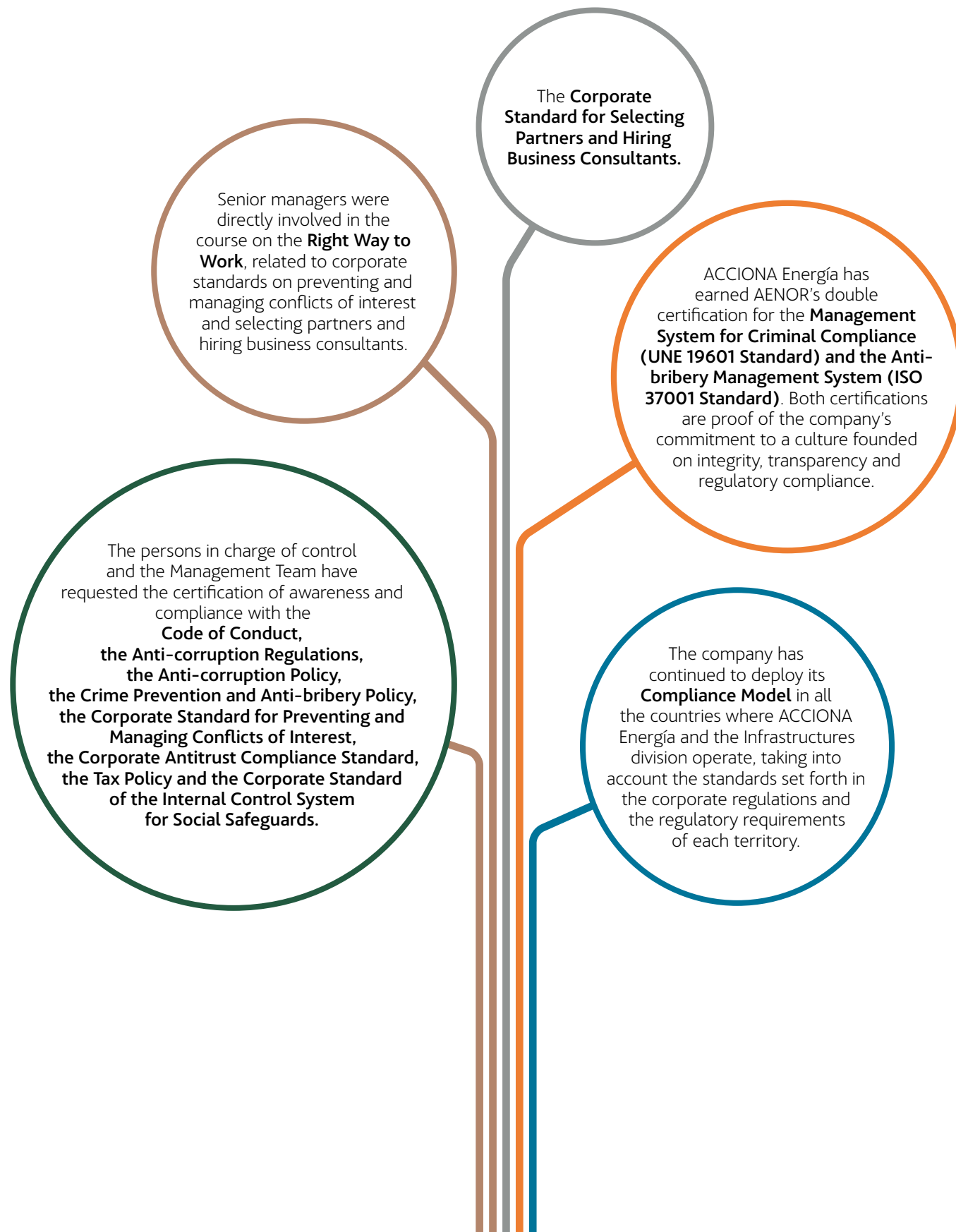
The company, in the process of running its business, maintains relations with public administrations and participates in infrastructure bidding processes in various countries. It is therefore necessary to analyse the corruption risks for each project, based on the country involved and the importance 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 and Internal Audit Management 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 Department reports to the Audit and Sustainability Committee of the Board of Directors.

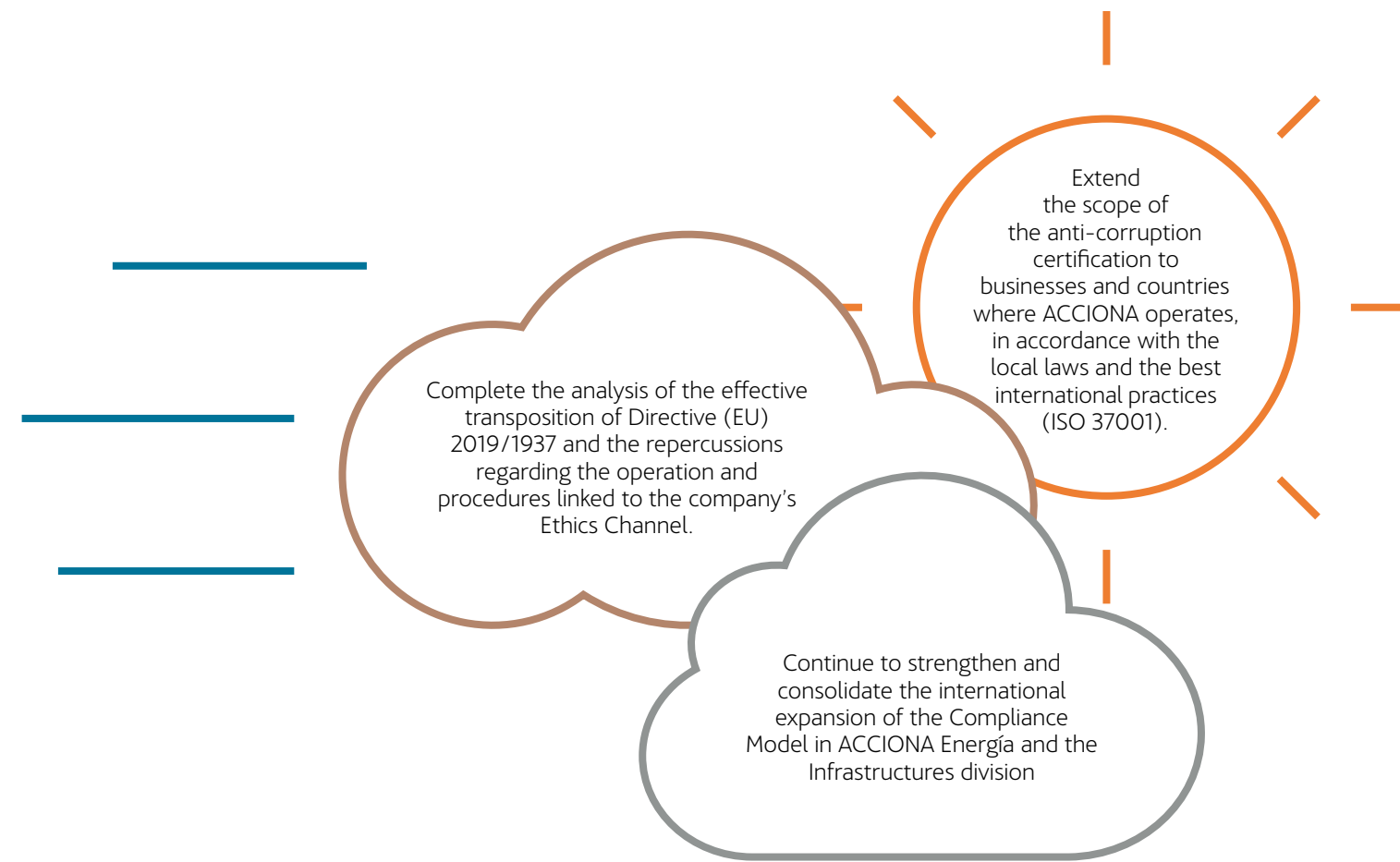
ACCIONA has adopted and implemented an Organisation and Management Model for Crime Prevention and Anti-Corruption (MPDYA), the characteristics of which are as follows:

- It is designed bearing in mind the organisational structure of the group, 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 mitigate the likelihood of their occurrence.
- The internal controls set rely on 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 control measures taken from other Internal Control Systems, including the Financial Reporting one, the Social Safeguards one and the Tax Compliance System, all of them aiming to prevent certain risks included in the scope of the MPDYA.
- The risks and controls foreseen in the Model are regularly reviewed and overseen.
- The controls foreseen in the Model, as well as the main corporate regulations on compliance, are certified every year by the persons in charge of control and the Management Team.

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



→ THE CHALLENGES FOR 2023 ARE



There were no corruption risks that materialised during the year, regardless of the fact that in previous years various investigations have been opened related to cost overruns, settlements and claims arising from public contracts involving group employees; in some cases they have been closed or are pending closure, and in others, they are still at the investigation stage.

ACCIONA'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 to start or speed 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 to know those third parties.

Anti-money laundering measures

In terms of money-laundering, the ACCIONA Inmobiliaria and Bestinver businesses are bound by the provisions of Article 2 in Spanish Law 10/2018, and have therefore established the internal control bodies and procedures required by the current regulations.

All ACCIONA employees are required to pay special attention to any circumstances revealing a lack of integrity of the persons or entities with whom the company maintains a business relationship. Cash payments are not allowed, other than in exceptional cases, with express authorisation and with traceable documentary evidence. In addition, the group monitors cash payments and due diligence procedures with suppliers and business partners.

In 2022, compulsory courses were given to the staff of the liable parties. There is also a general course on money laundering prevention available in the Workday learning module.

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. 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 takes on 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 principles of 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. Over 39,200 people have accepted the Code of Conduct.

The Code of Conduct Committee is responsible for monitoring and enforcing the Code of Conduct. This body is made up of representatives of the most relevant departments in the group in matters related to ethics and compliance.

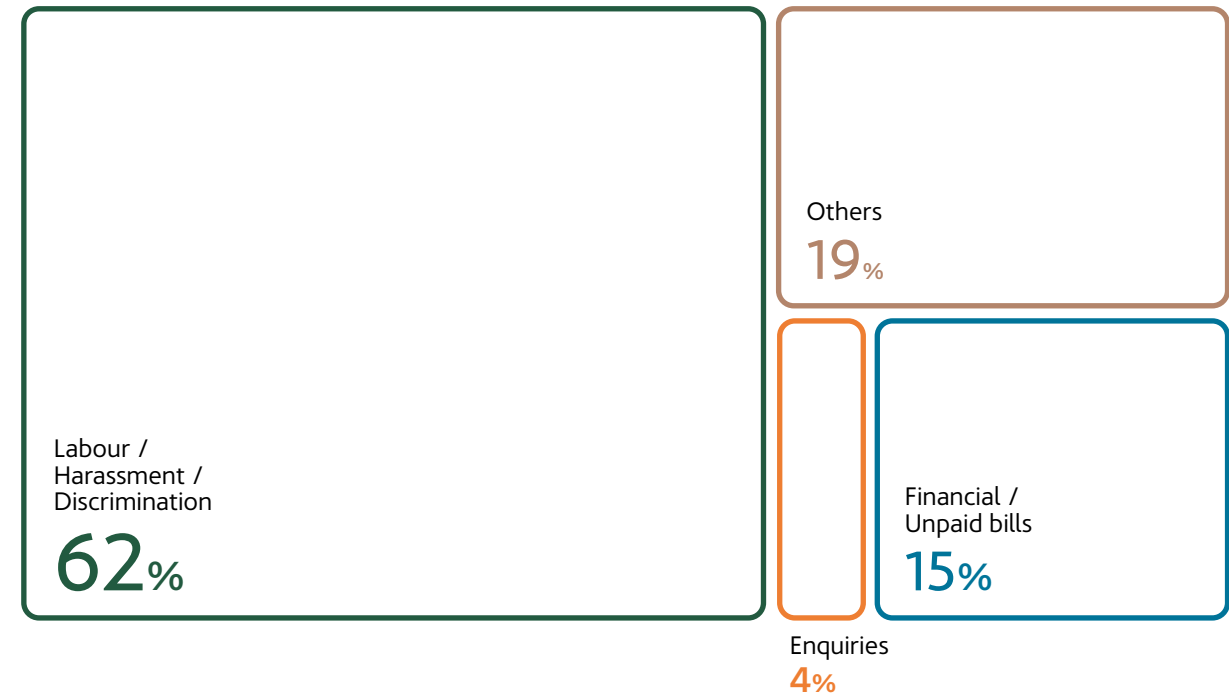
ENCOURAGE THE DISSEMINATION, KNOWLEDGE AND COMPLIANCE WITH THE CODE OF CONDUCT AND, IN GENERAL, WITH THE COMPANY'S ETHICS AND COMPLIANCE MODEL AMONG THE MOST RELEVANT STAFF AND THIRD PARTIES.

→ THE CODE OF CONDUCT COMMITTEE

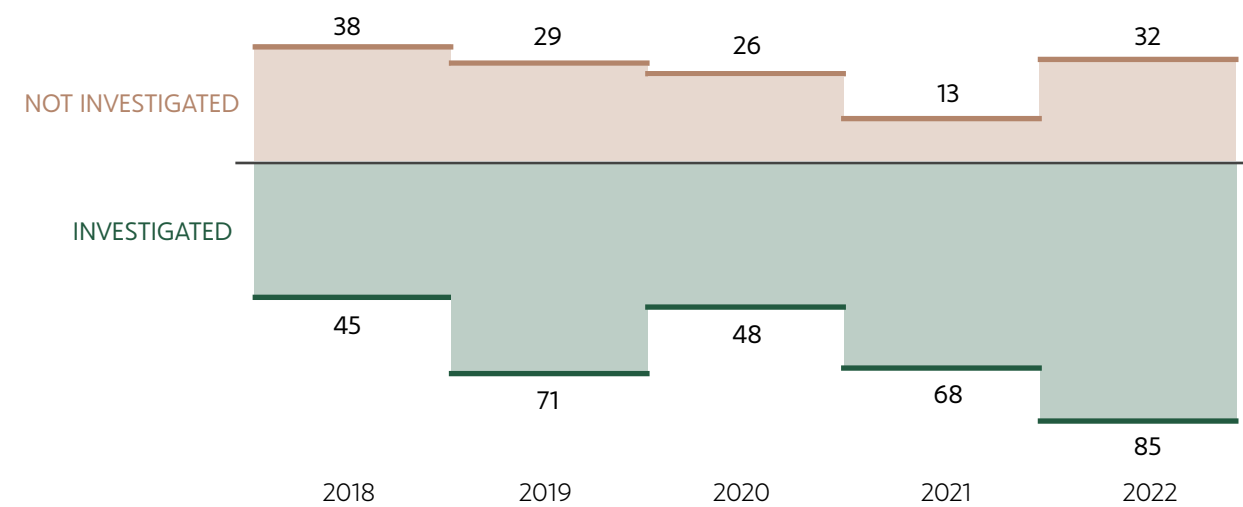


In 2022, 117 reports were received through this channel. Of those, 85 cases were investigated, 12 by an external investigator and 73 by an internal investigator. The remaining reports were dismissed, either ex officio because they do not fall within the competence of the Code of Conduct Committee, or after having received additional information from the corresponding department.

→ TYPE OF REPORTS



→ PROCESSING OF REPORTS



File not investigated: 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 filed, a preliminary investigation is conducted without appointing a specific investigator).

Out of all the complaints received, 72 were labour matters and 7 were sexual harassment complaints. All the cases in this area have been dealt with. In most of the workplace harassment cases there was no evidence of such behaviour as defined in the legal theory and jurisprudence of the labour courts. Nevertheless, the measures proposed by the investigator 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.

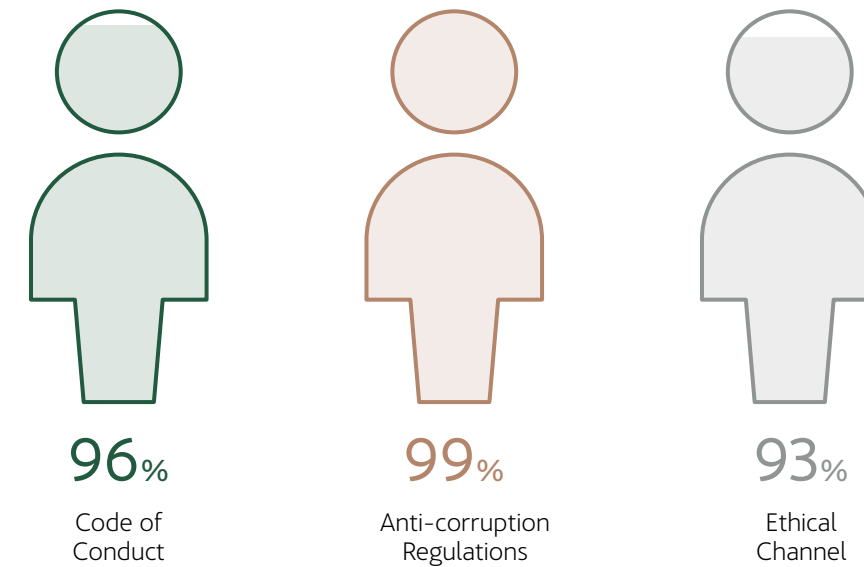
On the other hand, there were no complaints referring to giving or offering bribes or any other type of remuneration or similar consideration, to any individual or public or private entity for the purpose of illegally obtaining or retaining a business or a competitive advantage for the group. Nor have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

Compliance campaigns and training

In 2022, 184 campaigns were made regarding the Code of Conduct, Anti-corruption Guidelines, 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, 57 publications were posted on the intranet (55 in 2021), which included relevant information on anti-corruption relating to issues such as gifts, bribes, intermediaries and agents or interaction with public officials. Among said publications, three were on antitrust compliance and, in general, they highlighted the importance of using the Ethical Channel to report irregularities, expressly including those regarding the preservation of fair competition.

→ KNOWLEDGE OF THE CODE OF CONDUCT, ANTI-CORRUPTION RULES OF ACTION AND THE ETHICS CHANNEL ACCORDING TO COMPLIANCE SURVEYS



ACCIONA has a Training Programme on Compliance that includes a mandatory course on the Code of Conduct for all employees and a “Fighting against corruption” course that is mandatory for persons with a managerial or executive role.

As for this year’s courses, a new course was given to teach about the corporate standards to prevent and manage conflicts of interest and select partners and hire business consultants, which highlights the senior management’s commitment to compliance.

There were also global executive courses on compliance in the Infrastructures division and in ACCIONA Energía to raise awareness of the main corruption risks, referring to the specific laws in each country and to the Code of Conduct, internal standards and procedures and the Ethics Channel.

Furthermore, a course on competition was given to employees from the urban and environmental services business (ASUMA) and ACCIONA Energía. A session on “Criminal liability of legal persons: fraud and corruption in companies” was given to the management team in the Infrastructures division, as well as a session on the protocol foreseen in the event of inspections by authorities on the qualification and disqualification for senior positions. Lastly, four sessions were given on environmental offences in ACCIONA Energía.

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

COUNTRY	CODE OF CONDUCT	ANTI-CORRUPTION COURSE	“THE RIGHT WAY TO WORK” COURSE
Spain	1,412	451	566
Australia	759	208	91
Peru	318	273	84
United States	188	18	14
Chile	168	38	38
Mexico	122	33	177
Brazil	96	35	32
Qatar	56	7	12
Others	342	129	128
TOTAL	3,461	1,177	1,126

Competition cases

In 2022 the following developments in the cases filed against the company for competition affairs took place:

CNMC (Spanish National Markets and Competition Commission) - Road Maintenance Dossier

- Resolution of the CNMC’s Board notified on 19 August 2021 declaring that the existence of an infringement in Competition involving a cartel had been proven, restricting the number of tenders with low bids over a predetermined threshold that could be submitted by the cartel in the tenders for government road maintenance contracts. It is not, according to the CNMC, a distribution of tenders, but an attempt to moderate low bids being offered, which made it impossible to fulfil the contracts.
- ACCIONA Mantenimiento e Infraestructuras S.A. (“AMISA”) was declared to be in breach, along with another 11 companies in the sector and their parent companies, with a fine of €2,339,737, being the lowest of the 12 imposed. ACCIONA, S.A. was declared to be jointly and severally liable for the breach, not directly, because it is the ultimate parent company of the alleged offender, irrespective of the fact that it did not take part in or know of the breach. It entails objective liability affecting only the payment of the fine.
- The CNMC’s decision concluded that the contracting ban foreseen in the Public Procurement Act is applicable to the offenders, including ACCIONA Mantenimiento e Infraestructuras, S.A.
- ACCIONA has filed a motion to quash the CNMC’s decision. The court has agreed an injunctive relief suspending the effects of the monetary fine and the contracting ban.
- The contracting ban cannot be enforceable until the proceedings are opened, resolved and have a final decision to determine the scope and duration of said ban. This will not begin until there is a final judgement from the contentious-administrative court upholding the CNMC’s decision (ACCIONA has filed a motion to quash it).

G-7: Note on CNMC disciplinary proceedings against the seven leading Spanish construction companies

- The Spanish National Markets and Competition Commission (CNMC) announced its decision in July 2022, whereby it ruled that there was evidence of a breach of the Competition law, consisting of the collusion to share expenses from related technical studies required to bid for public tenders for civil construction projects in Spain by 6 of the leading Spanish construction companies, including ACCIONA Construcción, S.A. and therefore enforced fines on them. In its Decision, the CNMC confirmed that ACCIONA Construcción and the other offenders had not coordinated in any way the prices they bid for the projects in question nor did they share out projects.
- ACCIONA understands that the conduct punished, with the only purpose to save on bidding preparation costs, is not an anti-competitive practice. It also understands that the CNMC's Decision of July 2022 was made after faulty and irregular proceedings. ACCIONA disagrees with the CNMC's Decision and has filed a contentious-administrative appeal against it, trusting that the courts will realise it contravenes the Law and will therefore, quash it. The court has agreed an injunctive relief suspending the effects of the monetary fine and the contracting ban.
- The CNMC's Decision that the contracting ban foreseen in the Public Procurement Act is applicable to the companies it has declared as offenders, including ACCIONA Construcción, S.A. This ban cannot be enforced until the Spanish Consulting Board of Public Procurement initiates and resolves the appropriate proceedings to determine the scope and duration of said ban and the Spanish Tax Ministry enforces said ban. Regarding ACCIONA Construcción S.A., the Consulting Board will not begin said proceedings until there is a final decision on the appeal filed by ACCIONA Construcción S.A. to quash the CNMC's Decision of July 2022. The fine and the contracting ban do not affect any other company in the ACCIONA Group.

- Aside from the appeal filed by ACCIONA against the Decision of July 2022, there is also an appeal against the CNMC's decision to reopen these disciplinary proceedings, pleading to have it quashed as it violates fundamental rights. This prior appeal is still awaiting judgement.



Contributions to foundations and non-profit organisations

ACCIONA has a Corporate Donations and Sponsorship Standard. 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 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 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.

IN 2022, ACCIONA CONTRIBUTED €2,285,571 TO ASSOCIATIONS OR ORGANISATIONS PROMOTING SUSTAINABILITY AND TRADE ASSOCIATIONS, AMONGST OTHERS.

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 contributed €2,285,571 to associations or organisations promoting sustainability and trade associations, amongst others.

→ CONTRIBUTIONS TO ASSOCIATIONS FOR THE PROMOTION OF SUSTAINABILITY AND TRADE ASSOCIATIONS

ORGANISATIONS	CONTRIBUTION	INSTITUTIONS RECEIVING THE MAIN CONTRIBUTIONS (IN ORDER)
Institutions for promoting sustainability and global dialogue	€ 95,095	EU Corporate Leaders Group, Foundation for the Global Compact, Infrastructure Sustainability Council of Australia.
Institutions for the technical development of ACCIONA businesses	€ 519,572	European Australian Business Council, International Emissions Trading Association (IETA), Instituto de Empresa Familiar, Clean Grid Alliance, Roads Australia, Land and Liberty Coalition, Asociación Española de la Carretera.
Trade associations	€ 1,670,905	SEOPAN, American Clean Power Association, Wind Europe, Associação Brasileira da Infraestrutura e Industrias, Benban Solar Developers', Australasian Railway Association, Global Wind Energy Council, Asociación Empresarial Eólica (Spain).
TOTAL	€ 2,285,571	

ON THE OTHER HAND, THE MAIN MATTERS WHERE CONTRIBUTIONS WERE MADE ARE THE FOLLOWING

01 Decarbonisation of the economy, clean energy, achieving the goals of the Paris Agreement on climate change:

ACCIONA is actively pursuing compliance with the Paris Agreement and its decarbonisation commitments across all the geographic areas where it operates. To this end, it is involved, whether directly or through collective study groups or trade associations, in training and communication initiatives, in an effort to implement effective measures to decarbonise the economy. At the global and multilateral level, it mainly channels its commitment through global institutions or associations.

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

02 A water management model based on environmental and economic sustainability, thus contributing to Sustainable Development Goal 6 on clean water and sanitation:

Due to the particular nature of the water sector, which is less visible to the general public, the company pays special attention to the work of communicating and informing society and policy makers of the need to have a more efficient regulation of water management. Water availability and quality will soon be a key issue in many of the countries in which the group is currently operating.

A total amount of **€393,791** was invested in this area in 2022.

Due diligence of third parties

This procedure is carried out through the PROCUR-e web site and Dow Jones Risk Centre site for partners, intermediaries and commercial agents acting on behalf of ACCIONA. In addition, the company has three documents that describe how to perform due diligence: the Corporate Procurement Standard, the Corporate Procedure for the Certification and Evaluation of Suppliers, and the Corporate Standard for the Hiring of Business Consultants. The Dow Jones Risk Centre allows the company to obtain the necessary information on the identity of the 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 sanction lists, amongst other information. In 2022, 327 third parties were registered.

ACCIONA considers that tax systems are essential for a country to ensure society's progress and welfare and to keep its macroeconomic stability. The global scope of the company's operations gives it the chance to contribute to the development of public services and fight inequality in the different societies worldwide.


The company's commitment to responsible taxation is laid down in its Tax Policy, which contains the group's strategy and was adapted to the UNE 19602 requirements and certified in 2022.

The Policy is based on the principles of compliance with the Law and its reasonable interpretation, transparency, prevention and reduction of tax risks and coordination with authorities, seeking to contribute to the countries and territories where ACCIONA operates.

TAX INFORMATION

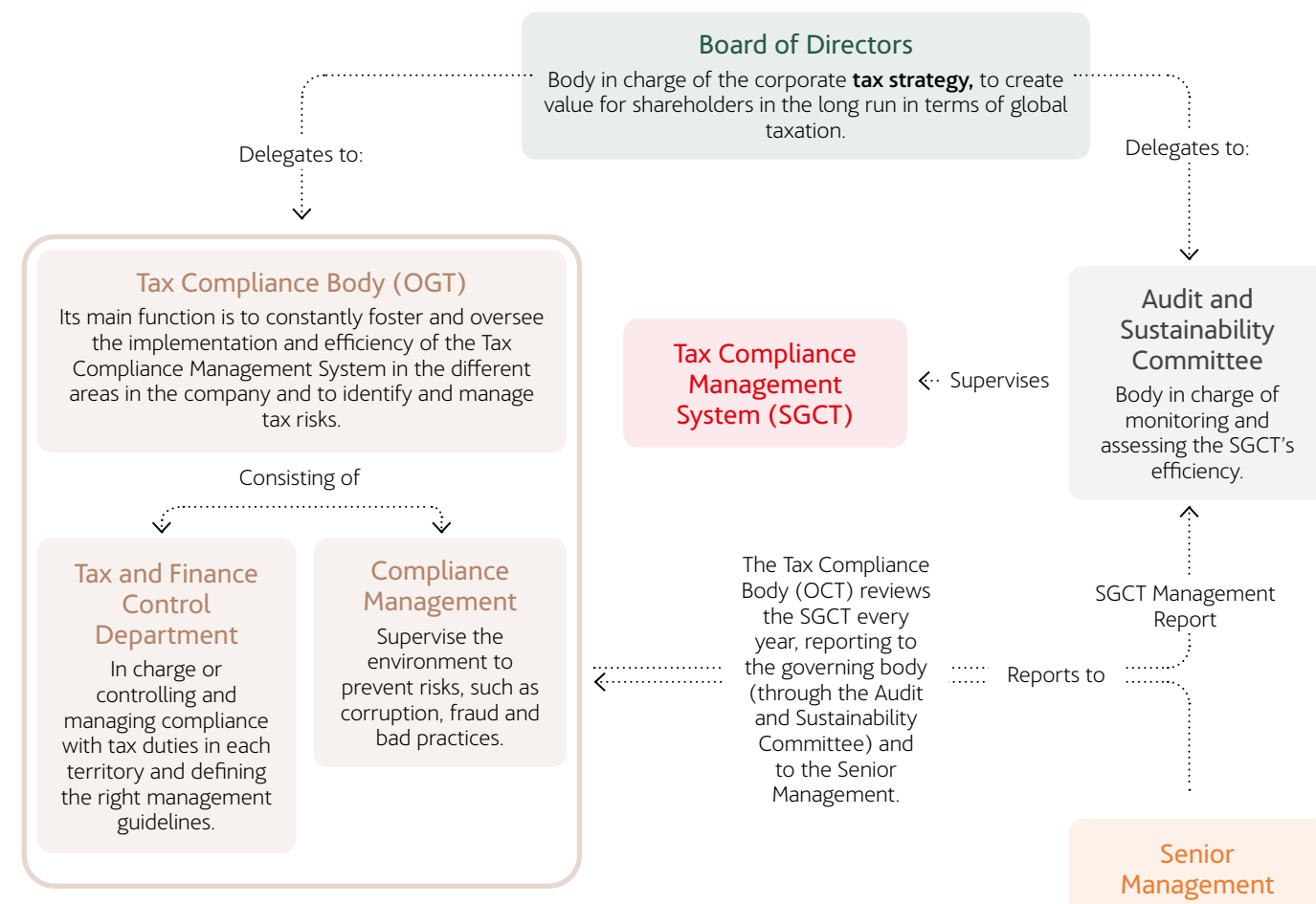
Tax policy

→ RESPONSIBLE TAXATION

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Significant	<ul style="list-style-type: none"> Loss of market share Lower revenue Bigger regulatory burden 	<ul style="list-style-type: none"> Gain market share

ACCIONA MEDIA: INFORMATION

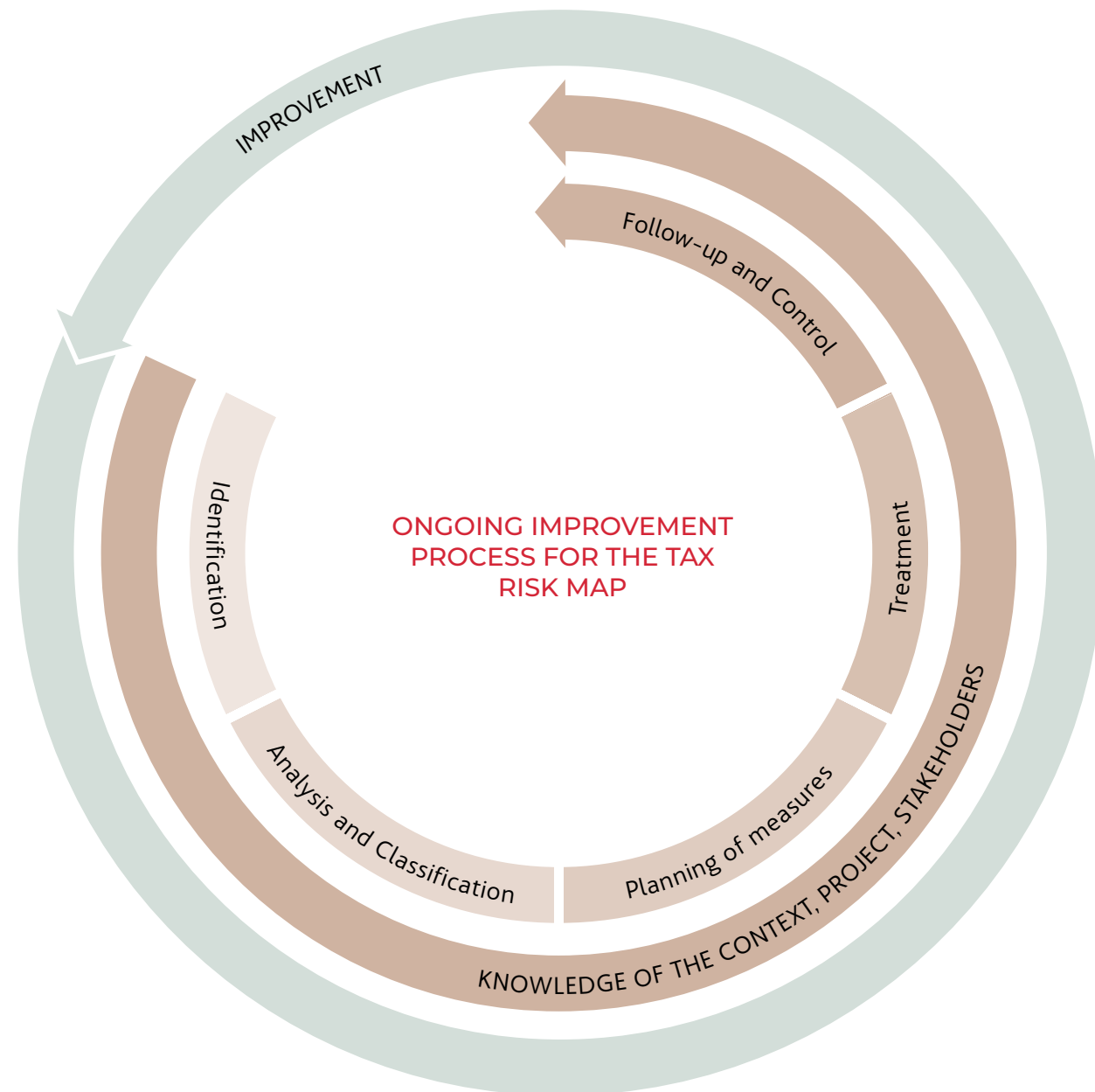
→ TAX COMPLIANCE MANAGEMENT SYSTEM (SGCT)



Detection and assessment of risks and opportunities

The Group, aware of the context of both the organisation and the interested parties identified, has developed a methodology to identify and appraise the residual and inherent risk of tax risks. Tax risks are incorporated into ACCIONA's Risk Map, using the same methodology and mitigation plans as for the rest of the group's risks.

The fast-changing political landscapes and their translation into amendments to national tax policies in the countries where ACCIONA operates entail a risk that the company faces through ongoing improvement processes for its Risk Map.



Transfer pricing

Services exchanged between ACCIONA 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 order to value and quantify the market value of the different activities performed by ACCIONA, we apply the arm's length principle in accordance with the OECD Guidelines. 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 operations or comparable transactions in similar circumstances. Aside from the results, the comparability, reliability and range are taken into account too.

Dispute and litigation management

Every year, ACCIONA submits an Annual Tax Transparency Report to the Spanish Tax Agency (AEAT) since it signed the Code of Good Tax Practices in 2011. Also, with regard to tax reporting and transparency duties, the company delivers a Country-by-Country Report to the Spanish Tax Agency every year.

It has also been filing its annual voluntary Tax Transparency Report with the ATO (Australian Taxation Office) since 2018. All these reports help prevent new conflicts that may arise from the different fiscal years.

Tax-related conflicts are under the section "Years subject to tax inspection" in the Financial Statements.

The Ethics Channel may be used to report tax-related irregularities confidentially as these violate the Code of Conduct. The mailbox is available to the company's employees, suppliers and contractors.

Country-by-country information

→ TAX INFORMATION COUNTRY BY COUNTRY (CBC)

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

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)	FOOTNOTE EXPLAINING EFFECTIVE RATE DUE	FOOTNOTE EXPLAINING EFFECTIVE RATE PAID
Spain	4,925	1,197	250	120.7	20,778	5	1, 10	10
Germany	23	-197	-11	0.05	277	-	7	2
Mexico	355	73	25	28.6	2,782	-	5, 9	5, 9
Australia	1,637	5	8	0.3	2,921	-	4, 5	10, 11
Poland	402	15	3	4.3	1,567	-	6, 9	9
Philippines	141	23	7	5.9	352	-	4	4
Italy	143	31	23	22.7	577	-	5, 9	5, 9
Brazil	432	55	19	4.4	3,830	-	4, 5, 10	10
United States	125	-82	-60	1.2	222	-	8	10, 11
Canada	432	-5	8	0.6	862	-	3, 7	2
Chile	517	-111	-11	0.1	3,228	-	7	2
Others	2,057	-136	-10	25	8,496	-		
TOTAL	11,195	868	254	215.2	45,892	5		

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

Furthermore, the social 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 (BIN).
- Non-deductible expenses and adjustment for inflation.
- Application of tax credits.
- Deferral for accelerated depreciation / unrestricted depreciation.
- Non-application of the tax consolidation method.

On 31 December 2022, the amount of capital grants and operating grants received by the Company amounted to 2 and 5 million euros respectively.

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

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

Relationship with the auditor

The item "Remuneration and other benefits" of the [Consolidated Annual Accounts](#) contains the information on the fees in relation to auditing services and other services provided by the auditor of the group'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.


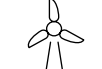

The *Audit and Sustainability Committee Report on the independence of the external auditor* is prepared annually. In this report, the Audit and Sustainability Committee of the Board of Directors delivers an opinion on the independence of the external auditor for each financial year in relation to ACCIONA,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



More information: [Remunerations and other benefits of the Consolidated annual accounts](#)

CYBERSECURITY

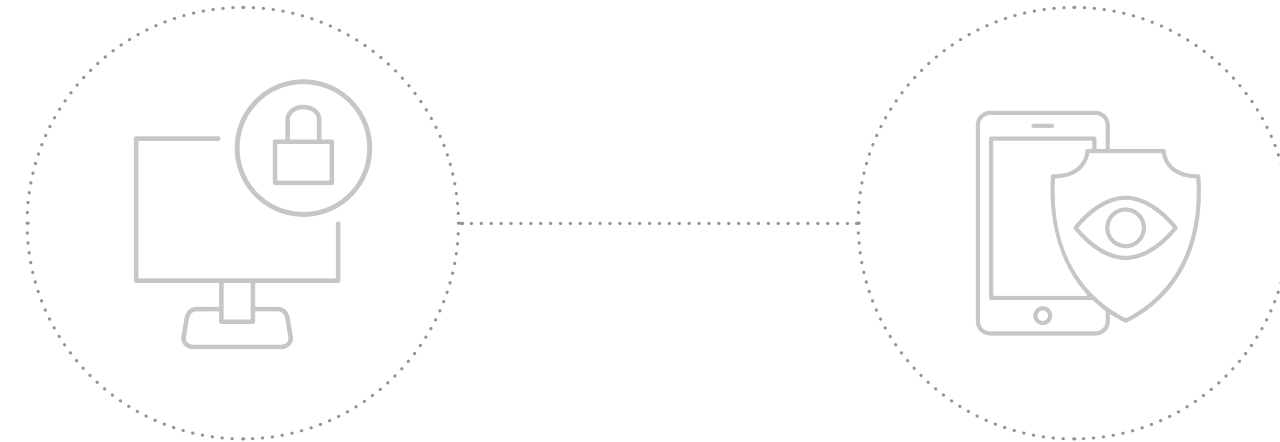
→ CYBERSECURITY

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Significant	<ul style="list-style-type: none"> • Lower asset valuation • Loss of market share • Bigger regulatory burden 	<ul style="list-style-type: none"> • Gain market share • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Higher operating costs • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden • Lower operating costs
	Important	<ul style="list-style-type: none"> • Higher operating costs 	<ul style="list-style-type: none"> • Lower operating costs

ACCIONA MEDIA: INFORMATION

Cybersecurity has always been an endless race, but it is changing at an increasingly faster pace. The study published by the World Economic Forum in 2023 highlighted cybersecurity failures as one of the most important threats in the short (0-2 years) and medium term (2-5 years).

The company has an Information Security Steering Committee made up of the CFSO, the Corporate Security Manager, the Technology and Processes Manager, the Human Resources Manager, the CFSO of ACCIONA Energía, the Corporate Resources Manager of ACCIONA Infraestructuras and the Group's Cybersecurity Manager. This committee is responsible for promoting and supporting the establishment of technical, organizational and control measures that guarantee the integrity, availability and confidentiality of information, within a general framework to manage cybersecurity risks. This makes such measures compatible with the necessary sharing of information and knowledge between the various organizational areas in ACCIONA.



For coordination purposes, there are different operational Cybersecurity Committees, in which the main cybersecurity managers of the different areas, functions, companies and territories that may be determined in each case participate. Moreover, ACCIONA Energía has established a specific Cybersecurity Committee.

Within the framework of ACCIONA's cybersecurity, (compliant with the different international standards, including NIST CSF and ISO 27001), all the control targets and procedures are defined for 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 so that any worker is 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.



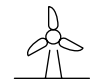
Furthermore, the group has established processes to prevent interruptions and cyberattacks on the IT systems.

In 2022, the company has made headway with its detection and response power against incidents and with the group's cybersecurity operations centre. During the year, there were no cybersecurity incidents that impacted the group's operations.

In 2023, the company intends to step up employee awareness and training and continue to improve the cybersecurity model, in line with regulatory changes and client requirements.

Sustainable transformative innovation

→ INNOVATION IN THE INDUSTRY

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Significant	<ul style="list-style-type: none"> • Lower asset valuation • Loss of market share 	<ul style="list-style-type: none"> • Lower operating costs
	Significant	<ul style="list-style-type: none"> • Higher operating costs 	<ul style="list-style-type: none"> • Lower operating costs
	Important	<ul style="list-style-type: none"> • Higher raw material costs • Lower revenue 	<ul style="list-style-type: none"> • Lower operating costs • Revenue increase
...	Important	<ul style="list-style-type: none"> • Loss of market share • Higher operating costs • Higher raw material costs 	<ul style="list-style-type: none"> • Lower raw material costs

ACCIONA MEDIA: INFORMATION

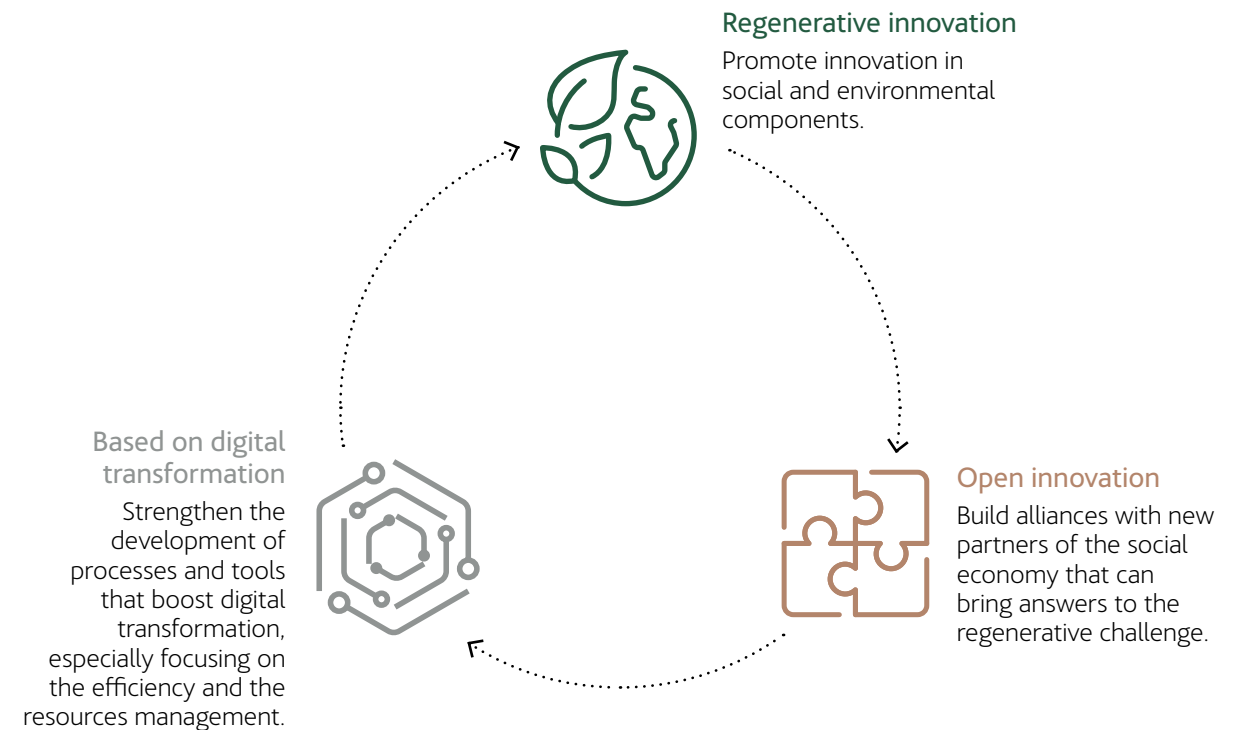
Innovation is a cross-cutting enabler of ACCIONA's corporate strategy, allowing it to increase the positive impact of its operations on the economy, environment and society. Sustainable transformative innovation paves the path to lead the business sustainability sector with a portfolio of entirely sustainable solutions.

ACCIONA's open, disruptive and digital innovation reaches every level and is deployed across the board. This allows us to develop the capacity, products, processes and services required to design a sustainable reality that is accessible to everyone and respects the environment and communities, whilst also influencing every project in the company.

Seeking to improve technical capacity in the Infrastructures and Energy sectors, ACCIONA decided to support the creation of two innovation areas specialised in these industries. On the one hand, we have the CAI (Corporación ACCIONA Infraestructura) area –which in turn includes the Water and Construction area– and on the other hand, the Energy area. With this, the company can meet its technical needs in a granular way. Besides its specialised areas, ACCIONA encourages innovation in all its business units.

OUR COMMITMENT TO INNOVATION

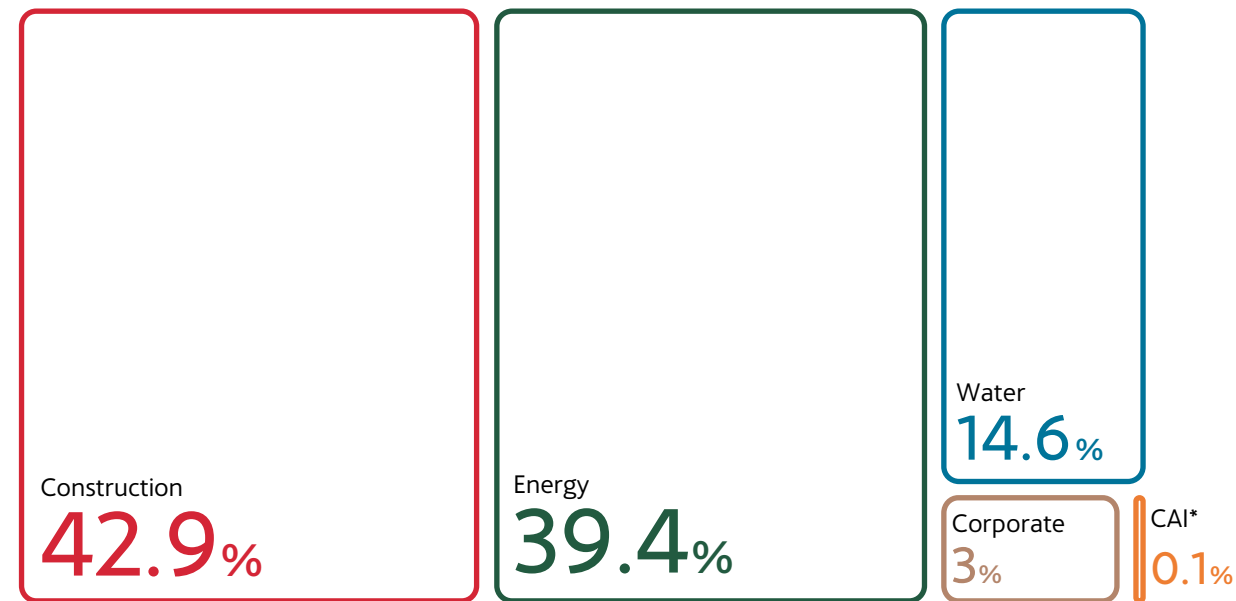
ACCIONA's strategy, developed through the Sustainability Master Plan, aims to:



ACCIONA's innovation in figures

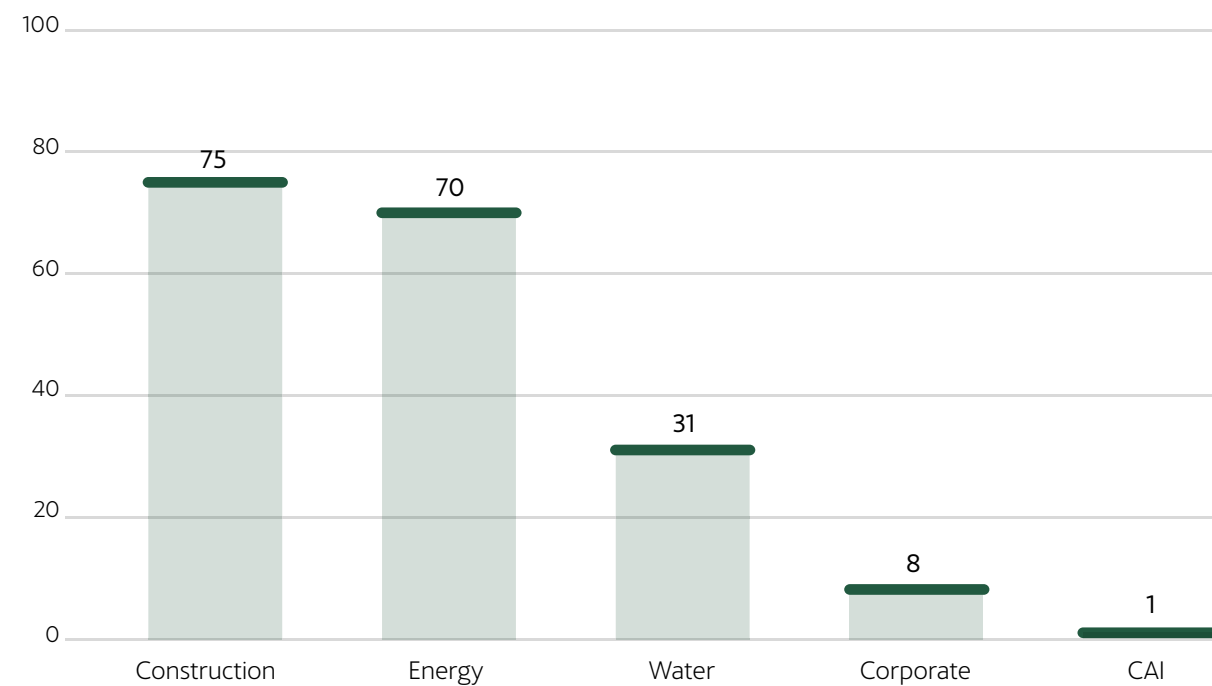
In 2022, ACCIONA reported spending €262.8 million euros on innovation, 5% more than a year earlier. The portfolio of projects for the year totalled 185. 67 of these were R&D projects and 118 innovation projects. The company has carried out 16 projects outside Spain worth €115.4 million, representing 44% of the total innovation figure reported.

→ DISTRIBUTION OF THE INNOVATION FIGURE BY BUSINESS LINE

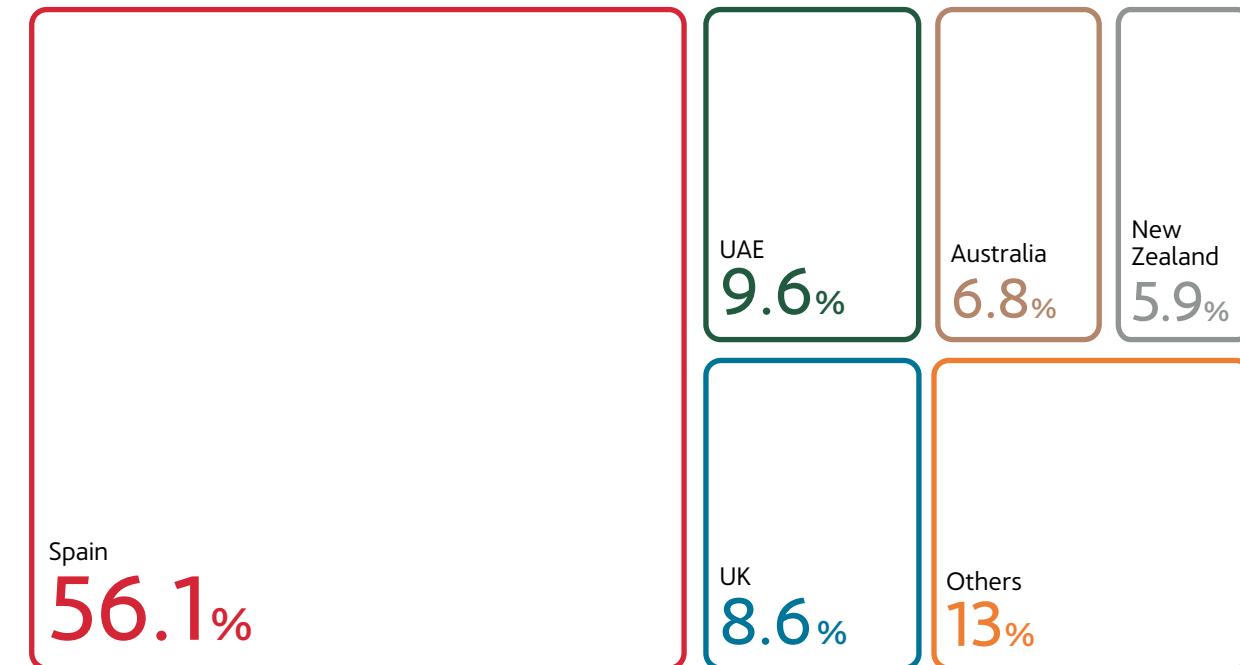


* Corporación ACCIONA Infraestructura

→ No. OF INNOVATION PROJECTS BY BUSINESS



→ INNOVATION EXPENDITURE BY COUNTRY



* Others include: Norway (2.73), Philippines (2), Canada (1.82), Brazil (1.77), Peru (1.6), Mexico (1.28), Paraguay (1.18), Panama (0.39) and Portugal (0.27)

* Rounded data

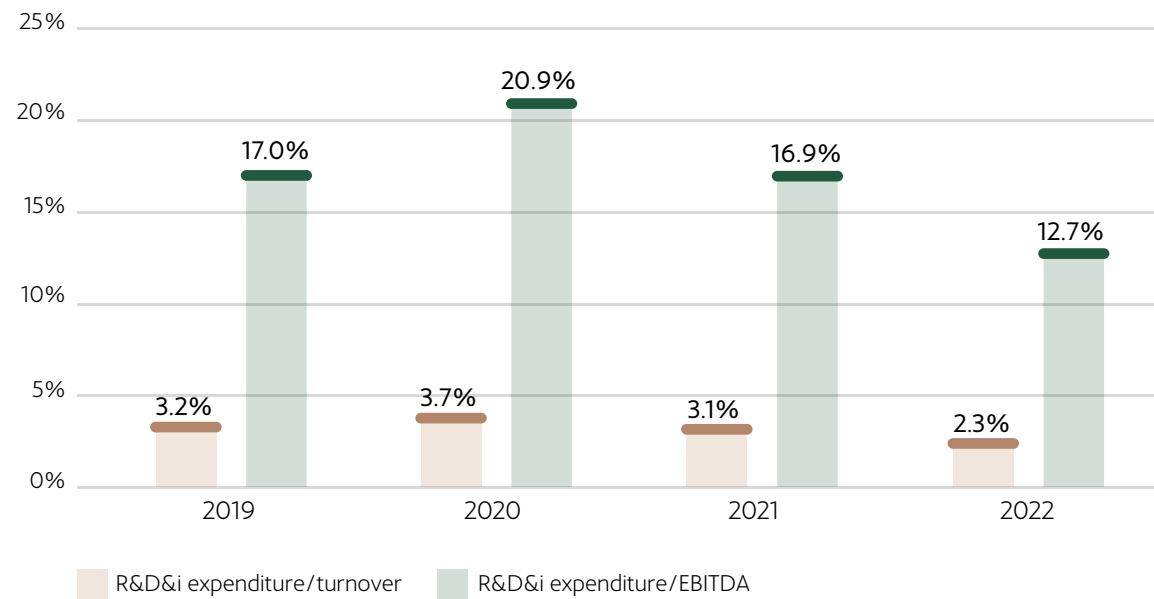
“The 2022 EU Industrial R&D Investment Scoreboard” report, produced by the European Commission’s IRI (Economics of Industrial Research and Innovation), ranks ACCIONA as the seventh Spanish company and the 134th European company for R&D&i.

→ ACCIONA’S INNOVATION EXPENDITURE

		2019	2020	2021	2022
R&D&i expenditure (M€)		230.4	237.0	250.2	262.8
EU Industrial R&D Investment Scoreboard	EU ranking	156	141	121	134*
	Spain’s ranking	6	6	7	7

* Data under review at the time of this report.

→ EVOLUTION OF INNOVATION INTENSITY



The innovation intensity ratio is obtained by dividing the innovation expenditure by the turnover. In 2022, this ratio was 2.3%.

STRATEGIC LINES OF INNOVATION

ACCIONA considers that being at the forefront of technology in its business sectors is a strategic priority and therefore tries to speed up the changes needed for a sustainable development and, at the same time, generate value for the company. By establishing specific objectives and action plans for the Infrastructures and Energy businesses, ACCIONA has been able to make progress with the company's strategy for innovation in 2022.

CONSTRUCTION TECHNOLOGY CENTRE

The Construction Technology Centre aims to equip ACCIONA's construction work with technological products or services that will bring a competitive and differential value compared to other companies in the sector. It also aims to have a positive impact on the cost and time and help minimise negative impacts on the environment and society.

The Technology Centre carries out its research projects in three large areas:

- 1 **Decarbonisation:** promising emerging technologies, green hydrogen, carbon capture.
- 2 **Industrialisation:** focus on construction processes aligned with the business specialisation areas.
- 3 **Digitalisation:** cover the digital needs in projects. Production control, asset control, improvement of project management.

Projects

In 2022, ACCIONA Construcción launched, as part of its R&D&i strategy, the project to Deploy the Earth-moving Platform at two of its sites, FARGO (USA) and Site-C (Canada).

In 2022, we also worked on the basic design of a semi-submersible floating platform (S-Bos), which was the first stage in the project to develop and deploy Floating Platforms for Offshore Wind Turbines.

WATER TECHNOLOGY CENTRE

The Water Technology Centre is engaged in R&D activities related to water and membrane technologies. These initiatives range from the most basic laboratory work to pilot plant studies and industrial scale-up. Tools are used for modelling, using fluid dynamics and for carrying out structural studies.

In addition, ACCIONA has a series of demo plants located in water treatment plants, where activities are conducted under real conditions that supplement those conducted at the technology centre.

The Technology Centre carries out its research projects in three large areas:

- 1 **Desalination and new technologies.**
- 2 **Purification and water reuse.**
- 3 **Purification and water chemistry.**

Projects

ACCIONA Agua, the group's water business, set itself the challenge of identifying the potential of biofouling in the seawater supplied to the company's reverse osmosis desalination plants and to establish operational preventative strategies. In 2022, at a pilot plant, the company selected and constantly evaluated a fouling sensor for reverse osmosis membranes to determine the potential of biofouling in seawater. It also developed a base fouling predictive model which is expected to include different bioindicators in coming releases.

On the other hand, in 2022, the company also completed the design of the Diffusair® technology for seawater flotation systems, with the 3D printing of 60 Diffusair@ nozzles. Its efficiency will be assessed over the next year at the desalination plant in Qatar.

ENERGY TECHNOLOGY CENTRE

The Energy Technology Centre focuses on innovating in the renewable energy field, increasing its scalability to transition towards a decarbonised economy.

The Technology Centre carries out its research projects in these three areas:

- Extending the useful life of assets, maximising production, advanced solar technology, innovation to ESG, storage and hybridisation, renewable hydrogen, vehicle to grid, waste to industry, advanced technologies in operation and maintenance (O&M), new business models in digital innovation.

More information on innovation in renewable energy technologies available in [ACCIONA Energía's Sustainability Report](#).

Projects

ACCIONA Energía is present in the development of two out of the three demo projects of offshore wind turbines chosen by CINEA (European Commission).

It has continued to monitor the environmental behaviour and the production of the floating solar plant in the Sierra Brava reservoir (Spain) and has begun to work on developing new technological solutions as part of the project on the channel-based agrisolar research farm. The company has continued to deploy new technologies in El Hub El Romero (Chile) to appraise the increase in production compared to conventional technology and its deployment in future commercial plants.

I'MNOVATION #STARTUPS

In 2022, ACCIONA ran 11 projects with startups as part of its open innovation programme, I'MNOVATION #Startups. These 11 startups are from different countries and introduced their solutions to the company's senior management in January 2023. Some of the most remarkable sustainable projects were: the development of technology to reduce the use of salt on roads, the development of a sensor to detect the level of membrane fouling in desalination plants, reducing consumption and optimising plant performance or the development of a platform for collective self-consumption installations.

The company is still committed to the development of the Spanish entrepreneurial ecosystem by participating in different open innovation initiatives such as *B-venture*, *Al Andalus Ventures*, *South Summit*, *Zebra Ventures* and *Startup Olé*.

In this regard, ACCIONA has continued to collaborate with LANZADERA, the most important startup accelerator in Spain. Within the framework of this partnership, several work sessions were organised with certain ACCIONA departments and the partnerships with startups in its ecosystem had produced a new solution to strengthen security in the new Campus ACCIONA.

DIGITAL HUB

ACCIONA's Digital Hub came to life to develop digital solutions in-house. It explores innovative technologies to be used in the business, creating a positive impact and gaining a competitive edge.

In order to promote new technologies that will help identify solutions to beat financial and environmental challenges, the Digital Hub takes part in forums to disseminate digital innovation and in programmes to bring technology closer to vulnerable people, and it also works on initiatives to boost talent attraction.

- 1 **Smart cities:** In 2022, different solutions for a circular economy were developed. The SOY ECO platform developed by the Hub encourages the exchange of items at recycling centres through gamification. It has also developed an asad or Computer Vision device that helps separate office waste correctly.
- 2 **IoT:** Develop comprehensive solutions based on hardware devices designed in-house to optimise energy consumption in buildings and public lighting.
- 3 **Data and IA:** Develop different artificial intelligence models together with ACCIONA Mobility to improve business operations in different cities. These AI models predict the number of journeys, the availability of

motorbikes by area, changes of battery, and other interesting parameters that help the business with its day-to-day operations.

- 4 **Robotics:** Development of a robotics solution for the inspection and surveillance of plants with self-navigating functions and manual settings for different routes and tasks to adapt to the different uses and challenges faced by ACCIONA. In fact, ACCIONA has been awarded the ITA Tunneling Awards under the Product/Equipment Innovation of the Year category for its work on the SPOT robotics platform to scan tunnels in Chile.
- 5 **Immersive Technologies:** In 2022, ACCIONA, through its Digital Hub, took its first steps in the Metaverse arena, aiming to become pioneers in an area that is yet to be discovered so as to explore and grab the opportunities it holds. Along these lines, the company has ventured into a few Metaverse experiences for different businesses.
- 6 **3D Printing:** Installation of sustainable street furniture in the Barqueta property development in Seville led by ACCIONA Inmobiliaria. This concrete furniture was built with its own 3D printing technology. This same technology was used to print indoor furniture made of lightweight concrete for the Campus ACCIONA site.

FOCUS ON COLLABORATIVE INNOVATION

ACCIONA, with its strong focus on innovation, has kept up its partnerships with different associations and worked with them, sharing industry activities and strategies and pursuing institutional support to R&D (European Commission, CDTI, etc.). It also organises workshops on success stories, lessons learnt and future plans that will help develop corporate innovation initiatives between peers and the strengthening of the innovation ecosystem of I'MNOVATION.

Partnerships with stakeholders

- 9th ECTP *Annual Conference*, which was held at the Madrid Town Hall in the Cibeles Palace.
- Taking part in sessions on offshore wind energy technologies.
- *Wind Europe – Annual Event 2022* BILBAO.
- *WindEnergy Hamburg* – Global event on offshore technology in Germany.
- Floating Offshore Wind 2022 – Global event on floating offshore technology in the UK.
- Task force of the Economic Cooperation Council on Zero Pollution that gives direct advice to the European Commission in this area.
- Policy Advisory Committee of the Water Europe (WE) platform, the main European platform for water technologies that regularly examines different water-related regulations and their impact on the sector and businesses.
- Spanish Association for Water Supply and Sanitation (AEAS). Participation in several task forces.
- Spanish Association for Water Desalination and Reuse (AEDyR). Members of the Board of Directors.
- *Institut Català de Recerca de l'Aigua* (ICRA). Member of the social and corporate Board.

ACCIONA has established a partnership network with many centres of excellence in Spain and abroad, with which it participates on various R&D&i projects depending on the needs detected and the experience of each entity.



It is worth mentioning that in 2022, the LIFE DREAMER project received an award at the Innovation Awards ceremony hosted by the International Water Association (IWA) within the Innovation for Desalination category.

Authenticity

This area of action arises with a view to prove that ACCIONA's commitment is genuine and that everyone in the group is familiar with it and share it. The company's values are recognisable and they are present in all its activities. The people making up the company recognise that the management is made up of trustworthy and credible persons who have values and are committed to the corporate mission.

CUSTOMERS

→ CLIENTS AND END USERS

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Important	<ul style="list-style-type: none"> • Loss of market share • Lower revenue • Bigger regulatory burden 	<ul style="list-style-type: none"> • Revenue increase • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Higher raw material costs • Regulatory burden • Lower revenue 	<ul style="list-style-type: none"> • Lower operating costs

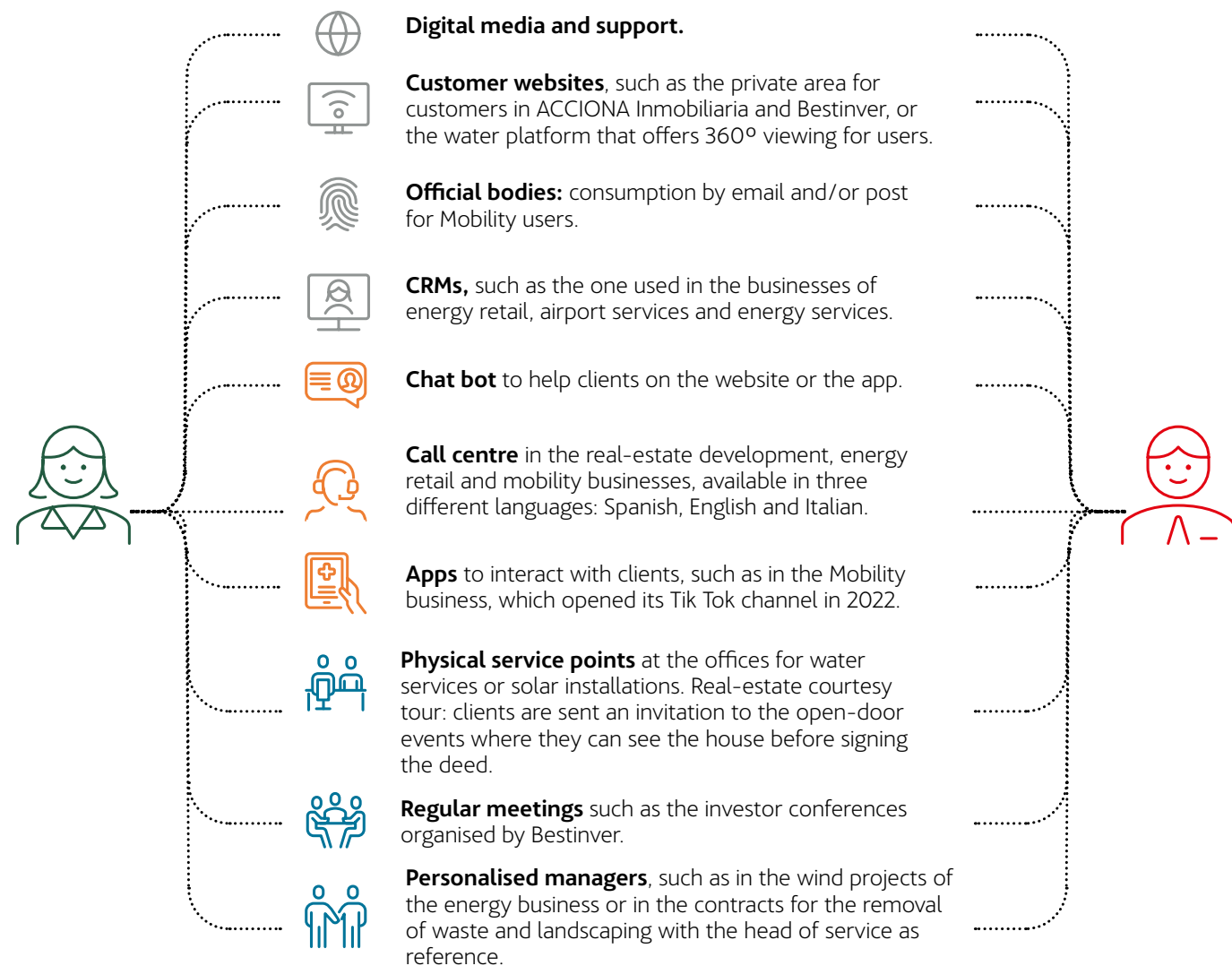
ACCIONA MEDIA: INFORMATION

ACCIONA's clients are as diverse as its businesses. They are fundamentally large organisations –Business to Business (B2B)– from the public and private sectors, and financial investors. However, some group companies, such as the water, services and real-estate business units, have direct contact with the clients or users of the services provided: *Business to Customer* (B2C).

Communications and customer relations

The communication channels with the company's customers pursue accessibility and agility. Taking into account the diversity of the customer portfolio of each business, communication is managed using a wide variety of channels, ranging from face-to-face attention to own web spaces for each of them.

→ COMMUNICATION CHANNELS WITH CUSTOMERS



Customer satisfaction

Measuring customer satisfaction helps to plan actions aimed at improving their experience with the company. Given the diversity of ACCIONA's products and services, the company considers a variety of factors in measuring customer satisfaction: from evaluating the meeting of deadlines and team performance in energy and construction projects, to sales management, meter readings or billing by the utility, or availability and incident resolution in services.

The most usual method of gathering information on satisfaction and/or experience with ACCIONA Energía's products, services and projects are surveys. In 2022, the company sent 19,051 surveys, with a response rate of 94%.

→ EVOLUTION OF SATISFIED CUSTOMERS (%)

	2019	2020	2021	2022	2022 TARGET
Energy	98%	99%	100%	100%	99%
Infrastructures	97%	96%	99%	99,9%	
• Construction	100%	100%	100%	99,6%	
• Concessions	100%	100%	100%	100%	
• Water	100%	100%	100%	100%	
• Other Infrastructure businesses			85%	99,9%	
Other businesses			97%	96%	
SATISFIED CUSTOMERS	97%	97%	99%	99%	

ACCIONA Cultura has asked about the appreciation of the concept and design of the project, among other matters. The percentage of customer satisfaction is 100%, and during 2022, no complaints were received from clients.

Meanwhile, Bestinver has continued to reinforce the commitment with its investors, implementing the new area of investments in infrastructure with the launch of Bestinver Infra FCD as an alternative to listed funds already in existence in the firm. Likewise, the range of funds in Luxembourg have been reorganised to make them more accessible to institutional investors. In Bestinver's case, the surveys were about the level of satisfaction with the 20th Conference of Investors.

In ACCIONA Inmobiliaria, the level of satisfaction ranged from 2.4 (post-sales) to 3.8 (booking and purchase) on a 5-point scale. Post-sales companies were hired to minimise delays in the handover of homes and shorten the incident-solving time. In the home post-sale process, the developer does not have the room for action in all phases.



MOBILITY

ACCIONA's best rated platform as an app with a 4.7 score on Apple Store and 4.4 on Play Store for Android.

Winner of the Madrid 360 Award: for Sustainability Mobility 2022, which prizes the best practices and initiatives in mobility in the public and private sectors, aiming to boost and bring visibility to action plans and initiatives by individuals, public and private companies, institutions and any entity leading exemplary mobility projects.

Complaints and claims handling

ACCIONA listens to its customers claims and acts accordingly through:

1. Specific procedures in all the divisions to manage complaints, claims and suggestions.
2. Accessible channels for customers to raise their complaints, claims and suggestions, such as specific sections on the websites of the water or energy utilities. Contact and follow-up actions with software, such as the one enabled by the Construction division for complaints related to building work or the online mailboxes set up by the Service area in various municipalities.
3. Complaint managers appointed to evaluate the complaints and coordinate their resolution.
4. Information provided to customers and users on the status of their complaints and their resolution and closure, once the person who filed the complaint confirms that they are satisfied.
5. Yearly recording and measurement of complaints received.
6. Measurement of the number of complaints that are closed or pending and the time spent on them. Definition of action and/or improvement plans as needed.

The number of B2B complaints dropped down to 3,221, whereas the number of B2C complaints rose to 18 per thousand customers. 85% of the B2B complaints were closed successfully, while the satisfactory resolution ratio for end-user complaints was 82%.

→ EVOLUTION OF THE COMPLAINTS

	2019	2020	2021	2022
Business to Business (B2B)				
No. of complaints	1,335	1,059	12,949	3,221
B2B complaints successfully closed (%)	86%	88%	83%	85%
Business to Consumer (B2C)				
No. of complaints (per thousand customers)*	17.0	0.07	4.8	18
B2C complaints successfully closed (%)		79%	17%	82%

* Includes Construcción, ASUMA, Agua Servicios, ACCIONA Solar, Mobility and Inmobiliaria.

Complaint resolution times vary from one ACCIONA business to another, depending on the nature of the business. For instance, the resolution time in the International Freight Forwarding business was 50 days (mostly because customers take time to send the documentation requested for paperwork with insurance companies or the airline/shipping company). The average resolution time for Facility Services Spain was 15 days. It usually takes two days for water services and less than a day for incidents in solar farms.

REDUCTION IN THE NUMBER OF COMPLAINTS IN CLEANING SERVICES

Renfe Operadora hired ACCIONA's audit service which, prior to the audits outsourced by the client, conducts operational controls and reports any errors found through internal channels for their rectification. This system, together with a higher degree of dialogue between the parties concerned, has allowed us to reduce the number of complaints from more than 100 in 2020 to 4 in 2021 and 0 in 2022 (contract ended in October 2022).

Loyalty, recommendation and comparison with competitors

Most of ACCIONA's businesses use additional assessments to measure customer satisfaction, including:

- The recommendations or level of satisfaction expressed by customers when asked: "Would you recommend ACCIONA to other companies?".
- The degree of loyalty which builds lasting relationships over time, by asking customers a direct question: "What is the likelihood of you hiring ACCIONA again?".
- The comparison of the company with competitors using a scale such as better, equal, worse.
- Out of 15 respondents in ACCIONA Construcción, 6 confirmed the likelihood of them re-hiring the company, the rest did not reply.
- 100% of ACCIONA Cultura's customers recommend the services and would hire the company again.
- 92% of ASUMA's customers and 95% of the Forwarding business customers would hire their services again.

In this respect, the assessment of different lines of business in ACCIONA as compared to its competitors is also significant. 87% of clients who answered the ACCIONA Construcción survey confirmed that its service is better or much better than its competitors and 67% of the energy supplier's large account customers in Spain also considered ACCIONA is above its competitors.



MOBILITY

During the year, the company runs ongoing campaigns to promote the use of its services and gain customer loyalty. It is worth mentioning:

- 1 **Gamification:** With the first journey of the month, the user enters a league that begins on the first day of that month at midnight and ends on the last day of the month at 23.59h. The user gets points for the amount of carbon saved (1 point = 1g of CO₂) and earns more points with the journeys made during the month and therefore climbs positions on the ranking. The prizes for the top 10 in each league are free minutes for future journeys.
- 2 **Mondays on wheels:** Every Monday morning, the user receives a different offer to start the week with special benefits to enjoy minutes at a cheaper rate.

Customer health and safety

The Quality Policy includes the principle of ensuring the health and safety of its 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 approved by senior management and at the disposal of all interested parties.

100% of ACCIONA's products and significant activities are assessed for their impact on the health and safety of customers and users, indicating, where appropriate, whether improvements need to be made.

There are a number of things that ACCIONA does to ensure the safety of its products and services:

- Information to customers on how to safely use its products and services.
- Product quality controls, critical point analysis and safety tests.
- Regulatory inspections and compliance checks regarding applicable laws and international standards.
- In the plants built by the industrial business, HAZOP (hazard and operability) studies are carried out in the design phase, to identify possible design problems early and improve the safety of the installation.
- Safety management systems that guarantee that the work is performed in accordance with the international benchmark standards established for each sector. Several ACCIONA businesses are certified in accordance with various international standards in this area:
 - **Road safety:** a motorway managed by Concesiones, AMISA Construcción and Agua Italia, with legal operational and administrative seat in Brescia, has safety management systems that have been certified as compliant with the ISO 39001 standard.
 - **Safety of Rail Services:** the freight transport safety management system of Rail Services has been approved by the State Railway Safety Agency (AESG).
 - **Airport safety:** Airport Services are certified by ISAGO (Safety Audit of Ground Operations) at the headquarters in Palma, Düsseldorf and Santiago de Chile, in accordance with the regulations of the International Air Transport Association.

- **Food safety:** sanitisation of food plants certified as compliant with the ISO 22000 standard.
- **Safety in the supply chain:** ACCIONA Forwarding is certified as an Authorised Economic Operator (OEA) by the Spanish Tax Agency.
- **Information Security:** the security services in place in the Madrid head offices boast the corporate ISO 27001 certification.

For domestic cold water, the company has implemented COVID protocols in all its cleaning contracts, especially in the hospital, food and hotel industries (protocols for sanitisation and product controls), and in all of ACCIONA's corporate head offices through the corporate framework contract for services.

Non-compliances

Healthcare has received nine penalties for incidents in the course of its services, but none for negligence in emergencies or lack of material.

Despite not being a matter regarding Health and Safety in ACCIONA's service, the energy supplier in Portugal was subject to an inspection on its compliance with all the applicable regulations and laws in November 2022. Said inspection revealed two faults or missing information that should be included in the bills sent out to consumers: information on the web page for people to file complaints and the web page with OLMC energy pricing simulators. On the other hand, the yearly report for customers is missing recommendations for efficient energy consumption and the customers' pricing history. The company replied to this notice and rectified the faults pointed out.

Product and service labelling

The energy sold by Green Energy has a certificate issued by the Spanish National Markets and Competition Commission (CNMC) which certifies the 100% renewable origin of the energy. Meanwhile, the water business complies with the standards established in the applicable laws regarding the quality of drinking, desalinated water, discharge parameters for treated water and other considerations.




Electric Mobility: For most points on the grid it is guaranteed and assured that the power supplied to our own charging grid is 100% green with Guarantee of Origin (GoO). In other words, it guarantees that the energy comes from a renewable source.




100% of the projects developed by ACCIONA provide all the information needed in the report delivered to customers. In 2022, there is no record of court rulings regarding the violation of regulations or voluntary codes relating to marketing communications or on breaches related to information and labelling of products and services.

Certified management systems

All of ACCIONA's divisions have certified management systems based on the most renowned international benchmarks in terms of quality, the environment and customer and user safety. In 2022, 100% of the company's most important activities were certified according to the ISO 9001 and ISO 14001 standards.

→ MAIN CERTIFICATIONS IN FORCE DURING THE YEAR

 ENERGY	<p>ISO 9001 and ISO 14001: marketing and sale of renewable energy with guarantee of origin accredited by CNMC, 100% of the MW installed and provision of energy services (ESCO). This does not apply to Energia Egypt, Hungary or ACCIONA Plug.</p> <p>New 2022: Electric Mobility: ISO 9001 and ISO 14001 and Equinov (ESCO France) ISO 9001.</p> <p>ISO 50001: 100% of the ESCO (energy services) activity in Spain.</p> <p>UNE-216701PSE-2019/0006: supplier of ESCO energy services.</p>
 CONSTRUCTION	<p>ISO 9001 and ISO 14001: 100% of the activity in several countries (Spain, Chile, Brazil, Mexico, Colombia, Canada, Australia, New Zealand, Philippines, etc.).</p> <p>AMISA, ASUMA Spain and Mexico and entorno.</p> <p>Green and Gracious Builder Scheme of Singapore.</p> <p>ISO39001: Road Safety Management Systems in AMISA.</p> <p>ISO19650-1 and ISO19650-2 Information Management System and BIM in the Building and Engineering businesses (new 2022)</p>
 CONCESSIONS	<p>ISO 9001 e ISO 14001: Concessionary company León Bajío Hospital, Concessionary company A2-Section 2 and ACCIONA Concesiones Australia.</p> <p>ISO 39001: Concession company A2, section 2 and La Plata Highway.</p>

 WATER	ISO 9001 and ISO 14001: 100% of the water treatment activity in Spain, Italy, Chile, Australia and New Zealand. 100% of the integrated management services.
	ISO 50001: in 15 centres in Spain.
	ISO 39001: Agua Italia (legal and operational office, administrative office and operational office in Brescia).
	UNI EN 16636: Pest management for Agua Italia.
 OTHER INFRASTRUCTURE BUSINESSES	ISO 9001 and ISO 14001: ACCIONA Infraestructuras Australia, ACCIONA Infraestructuras New Zealand.
	ISO 9001 and ISO 14001: Healthcare, ASU (extension in 2022 of the certificate to business lines for the management of waste transfer plants, treatment plans and landfill), AMA, Urban ecosystems.
	ISO 179002: Quality Management Systems for Medical transport companies under the Healthcare business.
	EMAS: AMA in León and head offices and Plans de Carballo.
 OTHER BUSINESSES	ISO 9001 and ISO 14001: cleaning of trains and stations of Railway Services, handling and driving gangways of Airport Services in Spain and Chile. Facility Services in Spain, Portugal, Mexico and Qatar. Forwarding with the scope: International Freight Forwarding. Real Estate and Cultural Engineering.
	ISO 20121 sustainability of events in ACCIONA Cultura.
	ISO 22000: domestic cold water sanitation in three food plants.
	NP4492:2010: requirements of the provision of maintenance services for Facility Services.
	NP4413:2012: maintenance of fire extinguishers for Facility Services.
	Certificado OEA (Operador Económico Autorizado): ACCIONA Forwarding.
	Fundación Bequal certifies ACCIONA's commitment to the integration of people with disability.
	ISO 22301 business continuity in Bestinver.

Audits

Internal and external audits by customers and certification bodies are one of the main tools used by ACCIONA to identify opportunities for improvement.

In 2022, the number of audits conducted was 420 in total. 372 of these were internal and 48 external. The majority were conducted to check compliance with the ISO 9001 and 14001 standards. Moreover, the company also received 182 audits from its customers.

Personal Data Protection and the Guarantee of Digital Rights

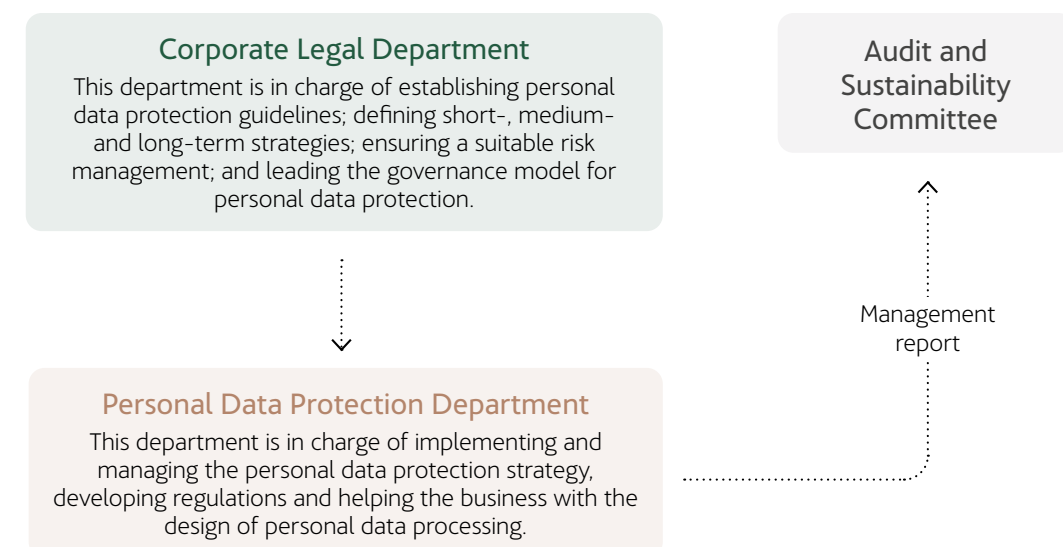
ACCIONA supports the digitalisation of processes and their automation, thus improving business productivity and the customers and employees' experience. With a view to overcoming the challenges entailed in becoming a data-centred entity, the company believes that having a system that will keep personal data security is a priority.

The importance of this matter shows in [ACCIONA's Policy for Personal Data Protection and Guarantee of Digital Rights](#). The internal regulations, with a global scope, sets forth that the company, its subsidiaries and, by extension, all of its value chain, are required to act adhering to the principles and rights set by law for the protection, processing and privacy of personal data.

ACCIONA also has a Personal Data Protection department that leads the organisation's commitment to use and protect identifiable details of customers, consumers, employees and partners in a responsible way.

To guarantee an adequate management of personal data protection, the following organisational structure has been established:

→ DATA PROTECTION GOVERNANCE



The training/information given by ACCIONA to all its employees on data protection is mandatory. In order to extend this culture to the supply chain, as part of the control mechanisms, ACCIONA's suppliers must necessarily accept the statement of compliance on personal data protection.

In 2022, there were no reports on data protection breaches to the supervisory authority and the company has not been subject to any penalties in this regard.

RELATIONS WITH THE PUBLIC ADMINISTRATIONS AND REGULATORY BODIES

ACCIONA keeps a transparent and constant relationship with public administrations in all the countries where 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.

ACCIONA encourages constant dialogue with regulatory authorities, getting involved in each case and always cooperating with them. As a result, the company is actively involved in the development of public policies that affect the areas and sectors it operates in, contributing to lawmakers its experience in the private sector.

Some of the practices aimed at raising awareness are the analysis, studies and dissemination of the results, as well as the participation in putting forward proposals and giving feedback or reasons during the public information stages in the different procedures aimed to set the regulatory framework for each sector.

The company's position is always consistent with its commitment to protect and respect the environment, support renewable energies and sustainability in the use of resources.

Furthermore, it encourages participation in forums, associations and different groups, providing knowledge, ideas, initiatives and experiences acquired for many years, aiming to drive public policies towards a sustainable development and growth, in the social as well as the economic and environmental aspects.



In accordance with its Code of Conduct, ACCIONA does not make financial contributions for political purposes or to obtain preferential treatment. Nor does the company use sponsorship or donations for those purposes.

ACCIONA KEEPS A TRANSPARENT AND CONSTANT RELATIONSHIP WITH PUBLIC ADMINISTRATIONS IN ALL THE COUNTRIES WHERE IT OPERATES

Within the European Union, ACCIONA has been registered since 2013 in [the EU Transparency Register](#), which records in a transparent manner, the interests organisations pursue, who defends them and budget allocated to those interests.



As for its collaboration with public bodies in 2022, the most remarkable processes are as follows.

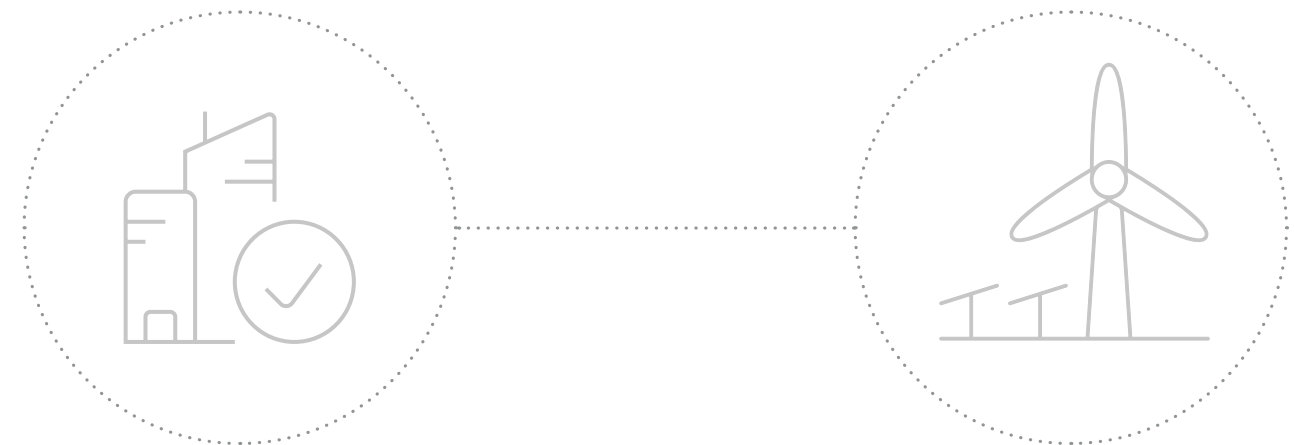
→ LINES OF ACTION: WE ARE NOT NEUTRAL

 ACTIVITY TO WHICH IT APPLIES	 EXAMPLES
Actions that apply to the whole group	Participation in the consultation processes related to the European Commission "Fit for 55" package aimed to review the legislation on climate, energy and transport to adapt it to the goals for 2030 and 2050, and the "Repower EU" package to adjust the EU regulatory framework of the energy industry to today's landscape after Russia invaded Ukraine. ACCIONA's proposals are related to renewable energies, energy efficiency, emission rights trading, sustainable mobility and environmental taxation, among others. Contributions to public consultation and information regarding financial aid schemes in the Recovery, Transformation and Resilience Plan. Contribution to the consultation on reviewing the National Integrated Energy and Climate Plan.



More information: [Register of Stakeholders \(europa.eu\)](https://register.europa.eu)



 ACTIVITY TO WHICH IT APPLIES	 EXAMPLES
ACCIONA Energía	Contribution to numerous public hearing procedures and participation in the preparation of reports and position papers of various entities and associations, in support of the decarbonisation of the energy sector related to: <ul style="list-style-type: none"> • Promoting renewable hydrogen. • Development of offshore wind power in Spain. • Simplifying the formalities for renewable energy projects, including distributed generation and self-consumption. Proposals to remove regulatory barriers and maximise its 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 right operation of the new flexibility resources and hybrid power plants. • Life expansion and upgrading of renewable power projects. • Process to access and connect renewable plants. • Promotion and regulatory development of new flexibility resources (storage, demand management, aggregation, electric car) and new renewable generation technologies (floating solar farms and on channels). • Redesign of the electric market and measures that affect the payment of renewable energy. • Offers of financial aids for renewable installations, self-consumptions, storage and renewable hydrogen. • Adjustment of the Spanish and EU regulations on power generation with biomass.
Infrastructure, water and services	Participation in numerous regulatory initiatives aimed at promoting the decarbonisation of the economy through: <ul style="list-style-type: none"> • Regulatory proposals aimed at enhancing the consideration of sustainability criteria in public procurement. • Support to policies that favour energy saving, efficiency and upgrade. • Boost the hiring energy management services with guarantees on savings by public entities and support to the development of the market for energy saving certificates. • Proposals to improve the regulation of the urban water cycle to guarantee the sustainability of the resource, market unity and better consumer protection. • Support to policies aimed at restoring and regenerating spaces and improving the circularity of building processes. • Proposals aimed at improving the management, processing and use of waste. • Proposals for a sustainable mobility: facilitate the deployment of electric vehicles with renewable energies, boost shared electric mobility and improve the regulatory framework of the infrastructure for vehicle charging.





Transparency

→ TRANSPARENCY AND DIALOGUE

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Important	<ul style="list-style-type: none"> • Loss of market share • Bigger regulatory burden 	<ul style="list-style-type: none"> • Higher asset valuation • Positioning against a bigger regulatory burden • Revenue increase
	Important	<ul style="list-style-type: none"> • Loss of market share • Bigger regulatory burden 	<ul style="list-style-type: none"> • Increase of market share

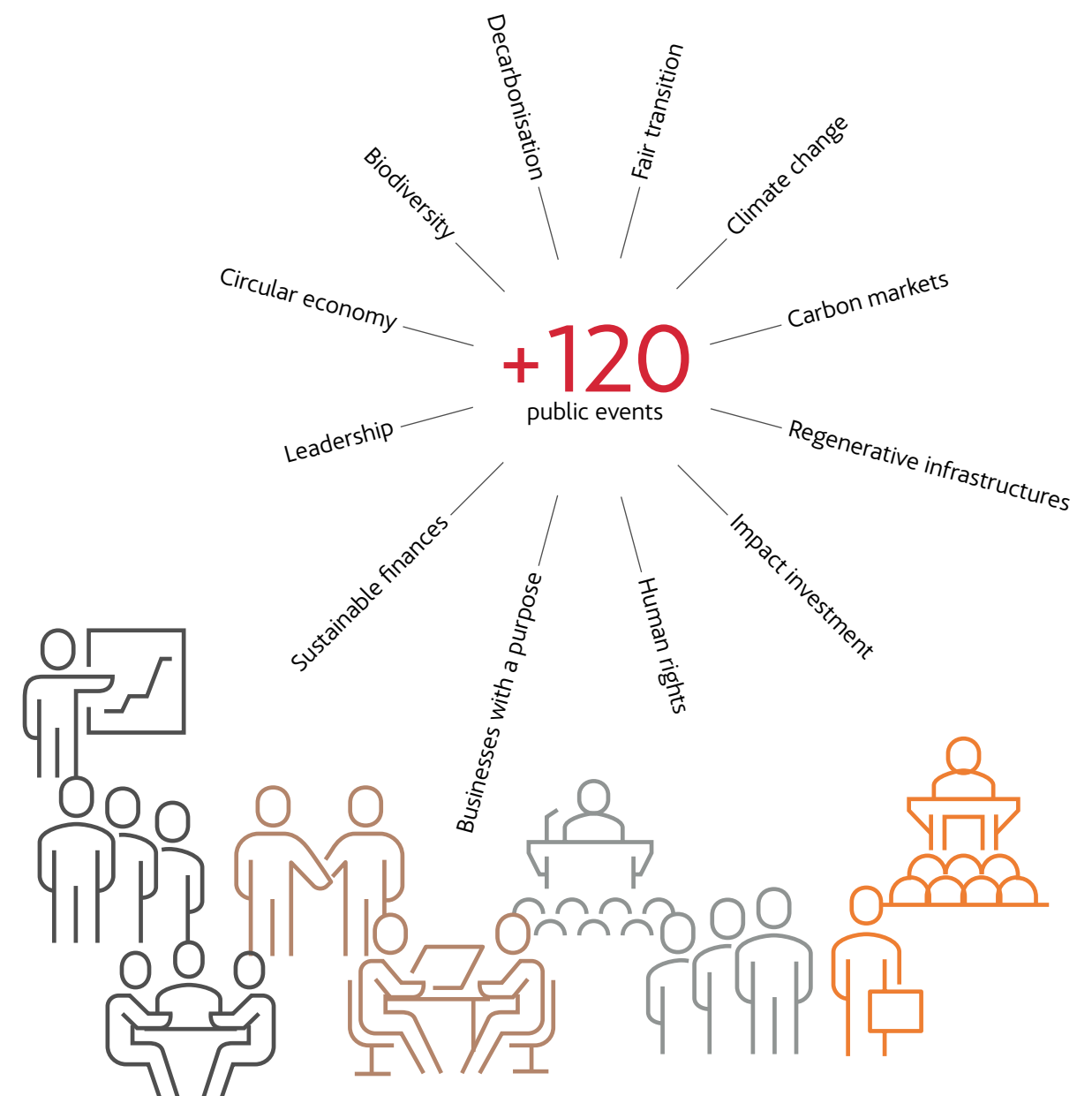
ACCIONA MEDIA: INFORMATION

DIALOGUE AND SUSTAINABLE LEADERSHIP

The 2025 SMP establishes, as part of its “Exponential Leadership” pillar, the goal of being perceived by our customers as one of the top 5 companies that most contributes to the sustainable development of our key markets. To do so, our participation in open-dialogue forums with our stakeholders and the building of local alliances in the main countries where we operate are essential.

Along these lines, ACCIONA has continued to be a member of the main entities fostering sustainability, including *CLG Europe*, *WBCSD*, *The Climate Pledge* and *UNGC*.

→ PARTICIPATION IN EVENTS





CLG EUROPE

ACCIONA has been a full member of CLG Europe since 2009. This initiative gathers European business leaders who are convinced of the urgent need to develop new long-term policies to combat climate change.

In 2022, ACCIONA signed the Letter promoted by CLG Europe which urged the President of the European Commission, Ursula von der Leyen and members of the EU Parliament to speed up the transition to a green and decarbonised economy, discarding the use of fossil fuels and strongly focusing on renewable energies. A series of examples were attached to the letter, including that of ACCIONA Energía to highlight the decarbonised solutions that European companies are already equipped to offer.

On the other hand, ACCIONA has actively taken part in tasks forces organised by this initiative during the year, and in different strategic meetings led by the initiative.



WORLD BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT (WBCSD)

Besides ACCIONA's regular participation in events and acts organised by the initiative, ACCIONA hosted a workshop at its head offices for the task force members called "Built Environment" in 2022. The conference gathered about thirty people from all over the world, who were able to discuss the challenges and opportunities found in the sustainable building world in the medium and long term.

On the other hand, the company has joined the pilot task force "TFND" to share ACCIONA's experience in implementing the pilot project for the TFND framework.

It has also been active in the "Policy, Advocacy and Member Mobilization" (PAMM) task force meetings that aims to mobilise businesses for the imperatives of globalisation, climate, nature and equity, in line with the WBCSD 2050 Vision.

ACCIONA has also taken part in the yearly WBCSD Delegates Meeting 2022 held in Switzerland. This event brought together experts from all over the world to work on innovative business solutions for all sectors and value chains.

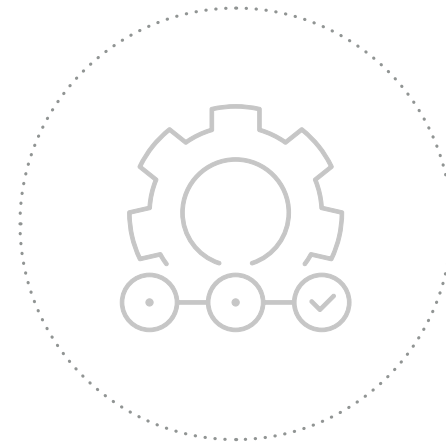
On the other hand, ACCIONA had the chance to share its view at the WBCSD Council on the matter of critical raw materials in a changing and uncertain geopolitical landscape.







THE CLIMATE PLEDGE

ACCIONA became the first Spanish energy company to join The Climate Pledge (TCP), the initiative launched by Amazon and the NGO Global Optimism, to encourage businesses to become carbon neutral by 2040, ten years earlier than the date established in the Paris Agreement.

Supply chain



→ SUPPLY CHAIN CONDITIONS

ACCIONA SOLUTIONS	IMPACT MATERIALITY	FINANCIAL MATERIALITY	
	RESULT OF THE TOPIC ANALYSED	RISK	OPPORTUNITY
	Significant	<ul style="list-style-type: none"> • Higher raw material costs • Lower revenue 	<ul style="list-style-type: none"> • Lower raw material costs • Revenue increase
	Important	<ul style="list-style-type: none"> • Higher raw material costs 	<ul style="list-style-type: none"> • Gain market share
	Important	<ul style="list-style-type: none"> • Lower asset valuation • Bigger regulatory burden 	<ul style="list-style-type: none"> • Lower raw material costs
	Important	<ul style="list-style-type: none"> • Loss of market share 	<ul style="list-style-type: none"> • Gain market share

ACCIONA MEDIA: IMPORTANT

ACCIONA considers that its supply chain management is a strategic priority for the business as well as a source of opportunities to generate value in the societies where it operates. The geopolitical landscape and the dramatic repercussions of the climate crisis have exacerbated the price variations on raw materials, which means that the supply chain has become one of the main sources of financial risks but also opportunities, as it can have an impact on the company's entire value chain.

This is why ACCIONA believes that keeping a sustainable management system for the supply chain, supported by the state-of-the-art technologies to protect efficiency and able to guarantee human rights and the protection of the environment is the right strategy to produce the resilience sought in a purchasing system that will create long-term value.

This corporate commitment to sustainable management is passed on to the value chain through the Corporate Procedure on Vendor Qualification and Assessment and the Corporate Procurement Standard, both based on the systems for enterprise resource planning (ERPs), planning and reporting tools, and the PROCUR-e system.

SUPPLY CHAIN MANAGEMENT APPROACH

The Supply Chain Management Department, coordinated with the Purchasing Departments of the different business units, is in charge of overseeing and executing the strategy described in the 2025 Sustainability Master Plan (SMP) for the management of the supply chain. ACCIONA Energía, since it became listed on the stock exchange, has its own department and separate targets. These are also aligned with the group's and may be checked in [ACCIONA Energía's 2022 Sustainability Report](#).

ACCIONA'S TOTAL FIGURES 2022

25,515
suppliers

+ €7,300M
(40% more than the amount managed in 2021)

The 2025 SMP consolidates sustainability within the function, mainly leveraged on the defence of social safeguards, identification of regenerative alternatives focused on reducing the carbon footprint and the development of the sustainable commitment of the supply chain. Along these lines, 80% of employees in the area of purchases has targets linked to sustainability.

→ DISTRIBUTION OF SUPPLIERS BY TYPE AND DIVISION IN 2022

BUSINESS LINE	CRITICAL	LOCAL/ NATIONAL	TOTAL No.
ACCIONA Energía	252	2,724	2,908
Infrastructures	1,662	18,469	19,280
• Construction	1,094	12,357	12,917
• Concessions	8	156	158
• Water	222	2,925	3,150
• Australia	338	3,031	1,055
Service	26	1,579	1,595
Other businesses	111	1,139	1,732
TOTAL	2,051	23,911	25,515

NOTE: The supplier/business assignment is made to companies with a higher volume of contracts with the supplier.

Critical suppliers

The level of criticality is assigned to suppliers and contractors depending on the financial risk. Every supplier with an annual business relationship exceeding €400,000 is considered critical.

THROUGHOUT THE YEAR, **8.04%** OF THE SUPPLY CHAIN BASE WAS DEEMED CRITICAL, ACCOUNTING FOR **88%** OF PROCUREMENT.

Local/national suppliers

Working with local/national suppliers has a positive effect on the economic development of the communities and minimises the operating risk as delivery and execution times are reduced.

94% OF THE COMPANIES OR MEANS OF DISTRIBUTION CONTRACTED ARE FROM THE COUNTRY WHERE THE PROJECT TAKES PLACE.

TOOLS FOR A SUSTAINABLE SUPPLY CHAIN MANAGEMENT

The PROCUR-e tool is a digital system where all of ACCIONA's suppliers must register before working with the company. This tool covers the entire procurement cycle and is the company's main mechanism to know and manage the risks and opportunities in the supply chain. It also offers services to handle tenders and claims by suppliers in a transparent and digital way.

PROCUR-E IN FIGURES

63,773 registered suppliers, **59,223** with ESG Risk Map.

€1,407M awarded in 2022.

5,948 RFQs awarded.

More than **3,000** users around the world.

These figures from PROCUR-e show an increase compared to 2021 with 20% more suppliers registered with risk map and a 33% rise in users, which shows the consolidation of the tool in the group's procurement ecosystem. For 2023, there are plans to clean the supplier master database to manage them in a more focused and streamlined way.

Over 2022, as part of the strategy to boost the digitalisation of the procurement function and the use of paperless technologies in ACCIONA, we reached the following milestones:

KEY MILESTONES 2022

01 Procure-to-Pay platform for the online exchange of orders and invoices

Over 63,000 invoices and 54,000 orders exchanged without using paper and with double the amount of active suppliers than in 2021, now amounting to 3,863.

02 Operation of a new ALIA Platform

To obtain full traceability of the supply chain in connection with the manufacturing, document control and quality assurance, transport and storage. It also enables the integration of the different players in the supply chain in real time (supplier, forwarder, customs officer...).

03 Migration to a reporting platform and a purchase analysis that is faster and easier for the user

Also enables the viewing of a real-time purchases dashboard to help with the decision-making process.

04 Deployment of Online Catalogues to manage the spend queue

Reaching over 33,000 orders transferred online and divided into 129 supplier catalogues with the resulting benefits of speed and control.

SUPPLIER VALIDATION AND AUDIT PROCEDURE

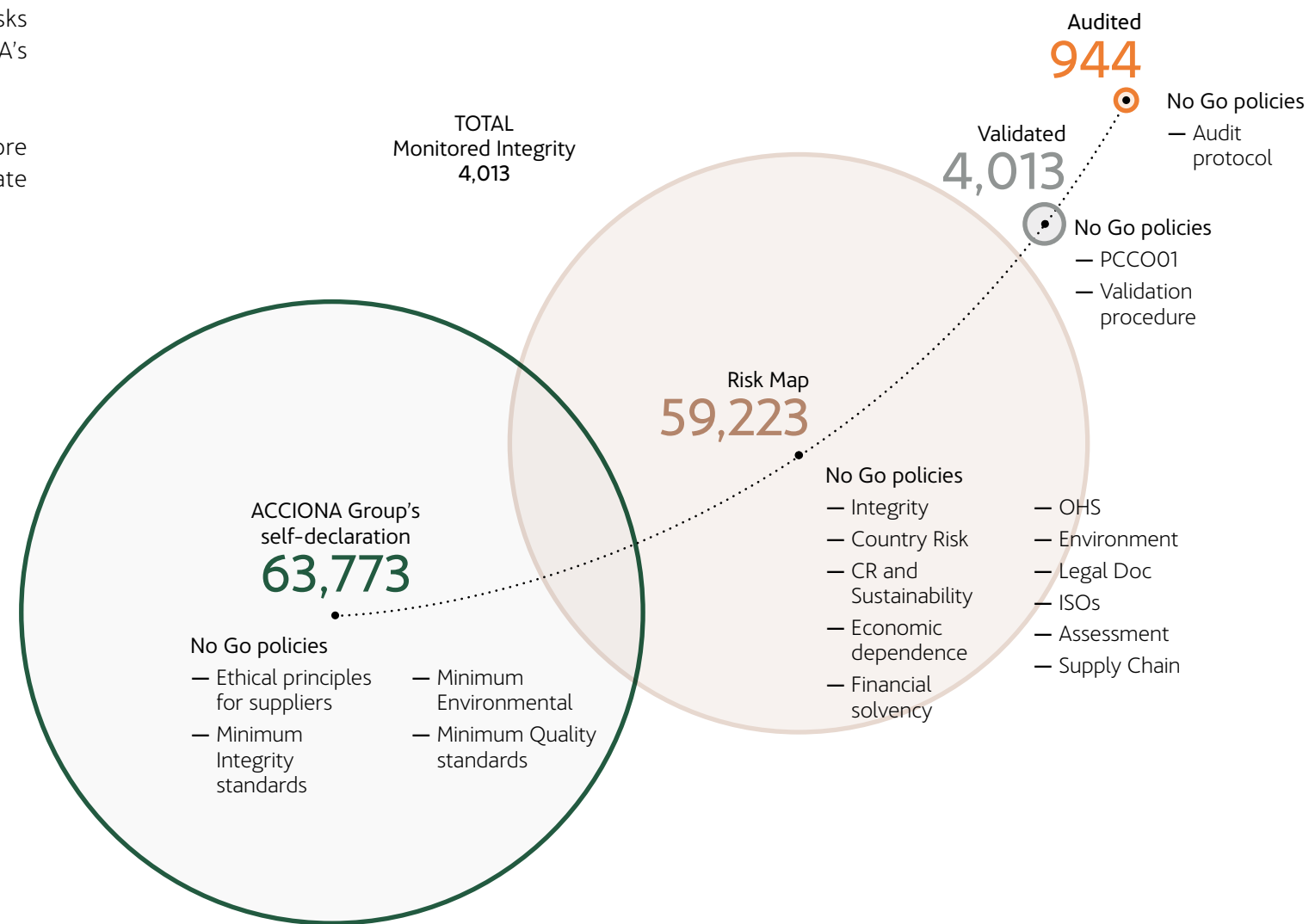
This procedure remains one of the main mechanisms for managing supply chain risks and generating improvement opportunities and sustainable growth in ACCIONA's purchasing processes.

Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as diverse risks increase related to finances, country, activity, corporate responsibility or sustainability. The levels are:

1. Suppliers must accept the group's Statement of Compliance.
2. To be able to bid, collaborating companies must fill in the self-assessment questionnaire in PROCUR-e, so that the company's Risk Map can be calculated and monitored.
3. In order to be awarded contracts over €400,000 (those considered critical suppliers), an additional control is required where the evaluation of the Risk Map is verified with extra due diligence (Validation).
4. Lastly, the highest level involves critical suppliers in risk countries, critical suppliers who are subject to a mandatory audit (MACS) or with significant or recurrent contracts. For this group, social and regulatory compliance audits are carried out by an external organisation that performs an on-site evaluation using the Group's Audit Protocol.

The analysis of integrity and monitoring of No-Go Policies are common at all levels, regardless of the level of criticality.

→ CONTROL SYSTEM IN THE SUPPLY CHAIN IN 2022



In 2022, ACCIONA has continued to work on developing the global procedure to control risks and opportunities among suppliers, launching the new SCRM (Social Customer Relationship Management) methodology. The goal set by the department was to streamline the procedure to register and validate suppliers whilst also improving the Risk Map for ESG in order to establish suppliers' criticality level and handle their risks and opportunities.

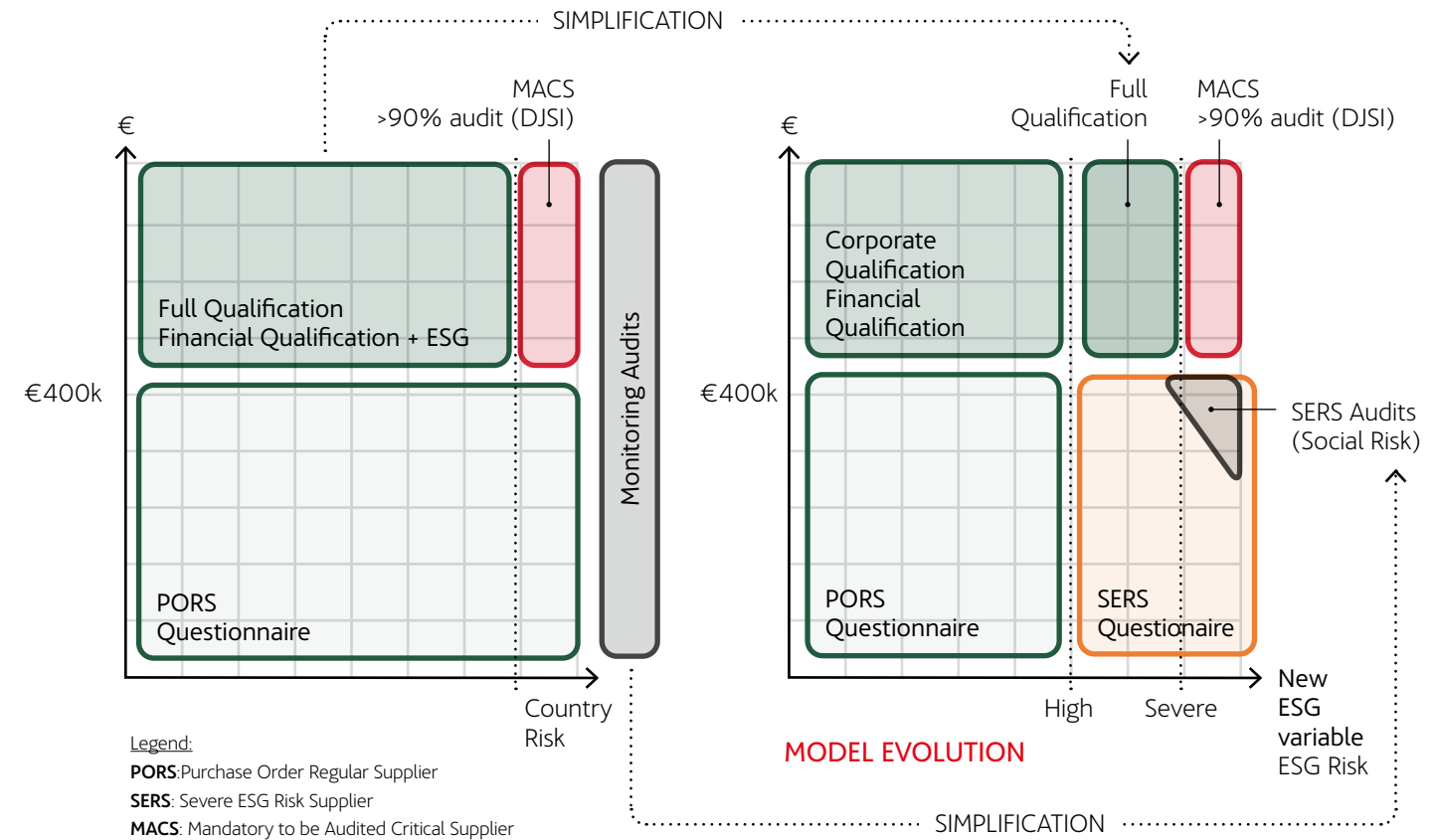


The main impacts of these changes are:

- Supplier segmentation: the financial element is no longer the only factor that determines if a supplier is critical or not. A new ESG risk variable is taken into account to establish the level of criticality regardless of the supplier's sales volume with ACCIONA.
- If the supplier shows a high ESG risk, they will undergo a specific evaluation focused on the E, S or G variable (or a combination of all three variables) that was identified.
- Streamlining the registration and validation procedure for suppliers without ESG risks and below the €400,000 threshold. This helps cut down the amount of questions asked to complete the supplier's registration by up to 75% by using technology and checking over 160 databases.
- Monitoring of possible negative information on all the suppliers through new Artificial Intelligence (AI) technology.

ACCIONA's goal within the SMP framework is to deploy this methodology gradually until it extends to all suppliers by 2025.

→ SCRM: NEW MODEL TO MANAGE SUPPLY CHAIN RISKS AND OPPORTUNITIES WITH ESG

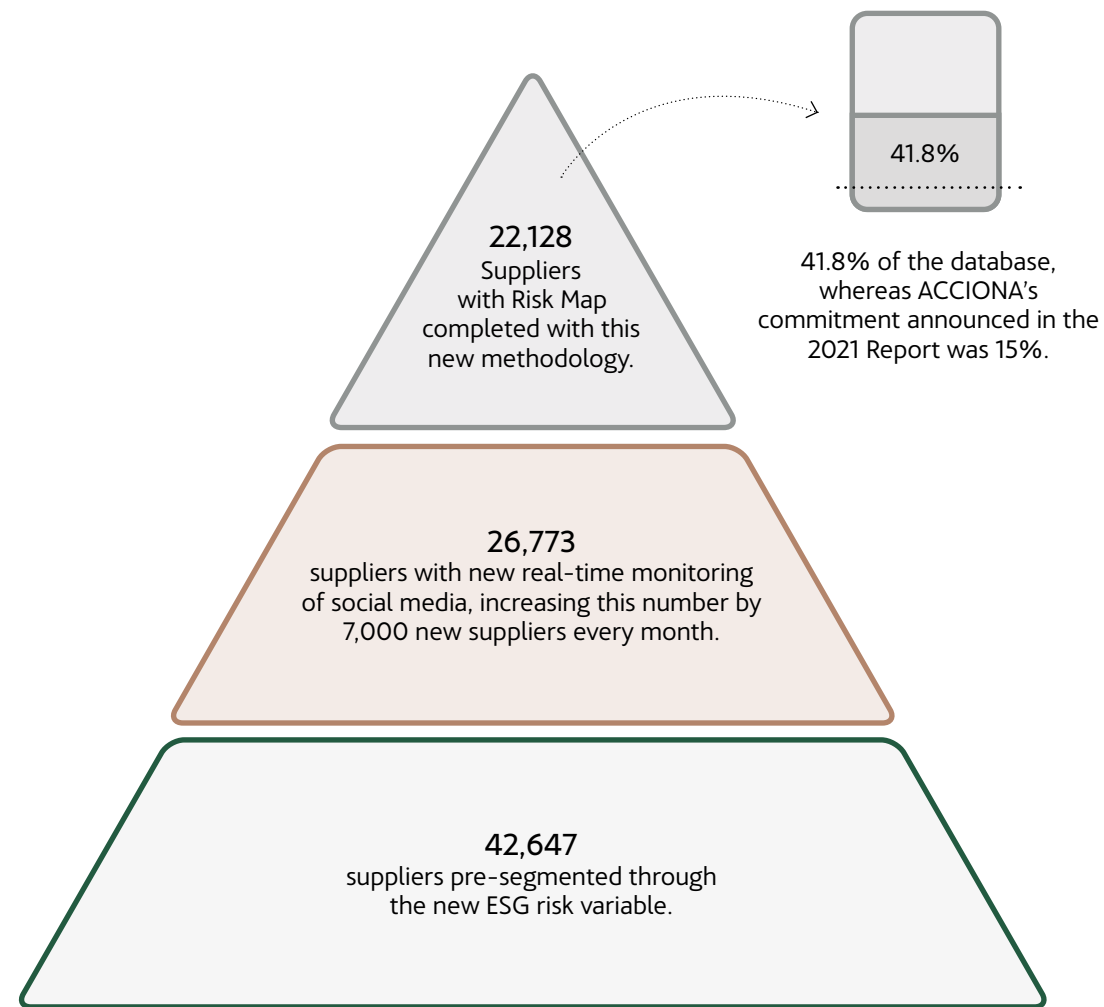


The new model, approved in 2022 and to be deployed gradually until 2025, is based on the GRI standards, adding to its supplier database a new ESG risk variable besides the sales volume element to control risks and opportunities. This means that suppliers with small contracts but high ESG risk will also be evaluated thoroughly with a view to implementing improvement plans.

Otherwise, these suppliers will be listed on the No-Go Suppliers list, as these policies have been adapted to the new model, strengthening the social safeguards. This new model also monitors reputation on the media of every supplier through AI technology instead of only focusing on critical suppliers.

So far, the supplier figures reported at the last Steering Committee (late 2022) on the pipeline of the new supply chain model are:

→ **SUPPLIER DISTRIBUTION**



With this new model, ACCIONA is equipped with a standard methodology that is adapted to the new regulations, including the Directive on Corporate Sustainability Due Diligence (CSDD), Modern Slavery Act (UK and Australia), UK Bribery Act, GHG Protocol and GRI standards, among others.

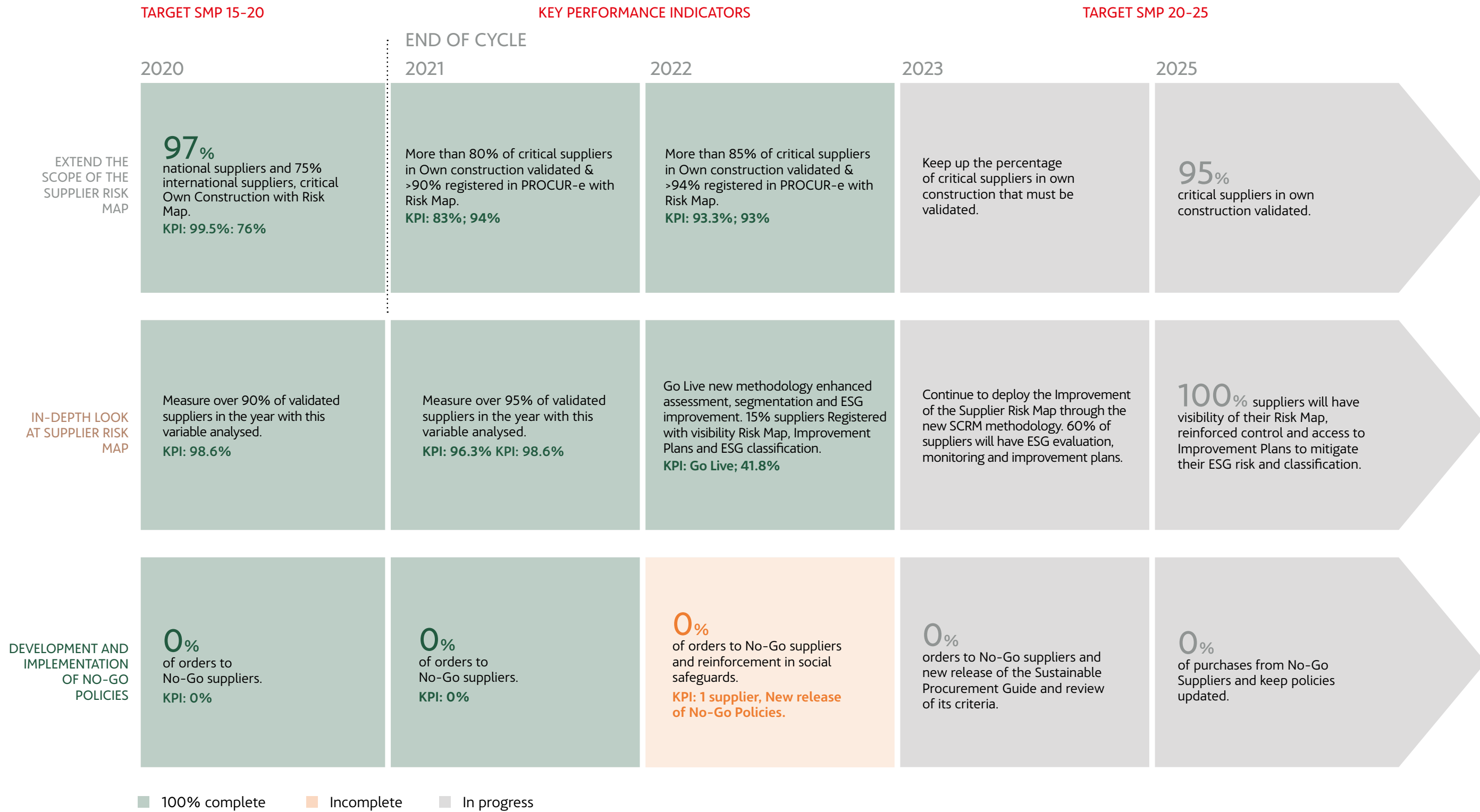
CHALLENGES FOR 2023 IN SUPPLY CHAIN MANAGEMENT

- 01 Continue to deploy the improvement of the Supplier Risk Map through the new SCRM methodology. 60% of suppliers will have ESG evaluation, monitoring and improvement plans.
- 02 Creation of the pilot for Scope 3 Measurement with revised methodology for at least two of the strategic procurement categories.
- 03 Maintenance of the percentage of critical suppliers in own construction that must be validated.

These targets are applied to all ACCIONA, except for ACCIONA Energía, whose targets are also aligned but are adapted to their particular circumstances.

⊕ **More information:** [ACCIONA Energía's Non-financial Information Statement 2022.](#)

→ DEGREE OF FULFILMENT OF THE OBJECTIVES OF THE SUPPLY CHAIN



ELEMENTS OF THE CONTROL SYSTEM IN THE SUPPLY CHAIN IN 2022

Statement of Compliance

ACCIONA extends the dissemination of company's ethical principles to its supply chain as essential to consolidate a network of suppliers, contractors and partners in line with its corporate values.

Through its portal and the PROCUR-e tool for tenders, as well as the general terms and conditions in contracts, all suppliers must accept a document that includes, among other things, the ethical principles for suppliers, contractors and partners, the code of conduct and the minimum requirements in terms of integrity, quality, environment, information security and personal data protection.

RESPONSIBLE SELF-DECLARATION FIGURES

In 2022, **63,773** suppliers accepted said document, which is **20%** more than in 2021.

Of the suppliers with Risk Map, **54%** declare that they have their own Code of Conduct.



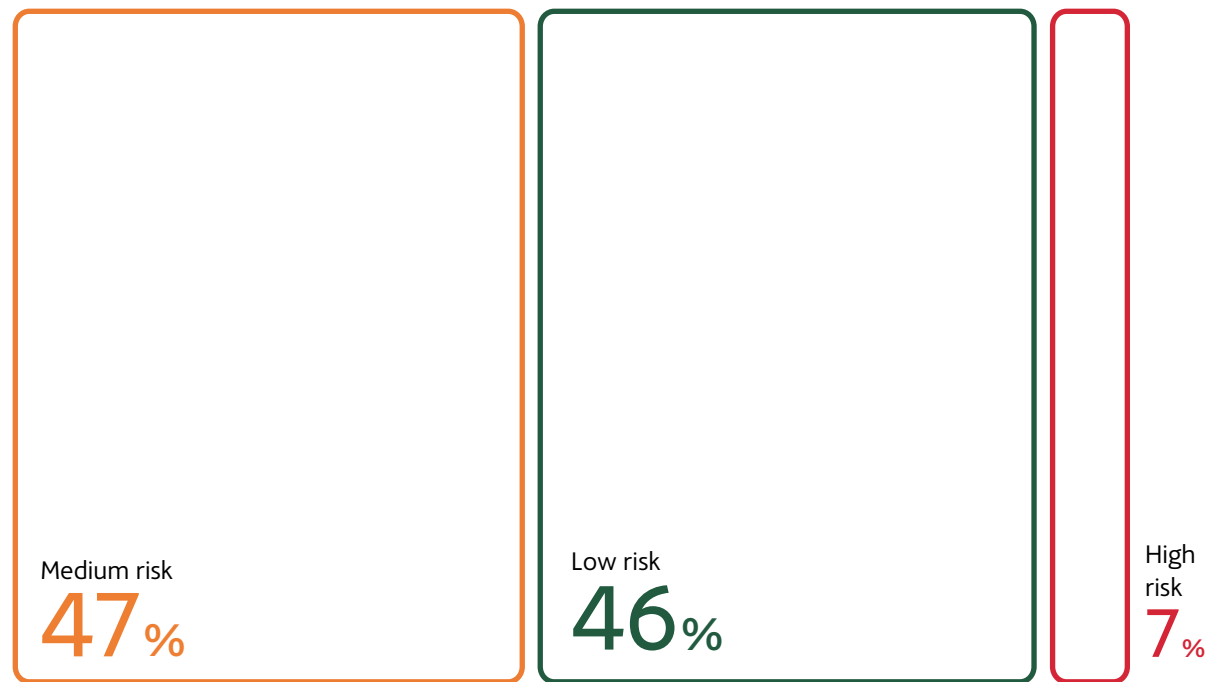
Risk Map

The Risk Map is ACCIONA's primary supply chain risk control and management tool. Through this mechanism, the company informs all its suppliers about its criteria and policies on the subject of corporate responsibility and sustainability.

A supplier's Risk Map is made available prior to contracting. At present, the Map consists of eleven variables: ESG, ethics, integrity and financial solvency, among others. The percentage of the scope of the Risk Map and control increases as the supplier's criticality level rises. This assessment of the Map Risk is verified in the approval and on-site audit processes.

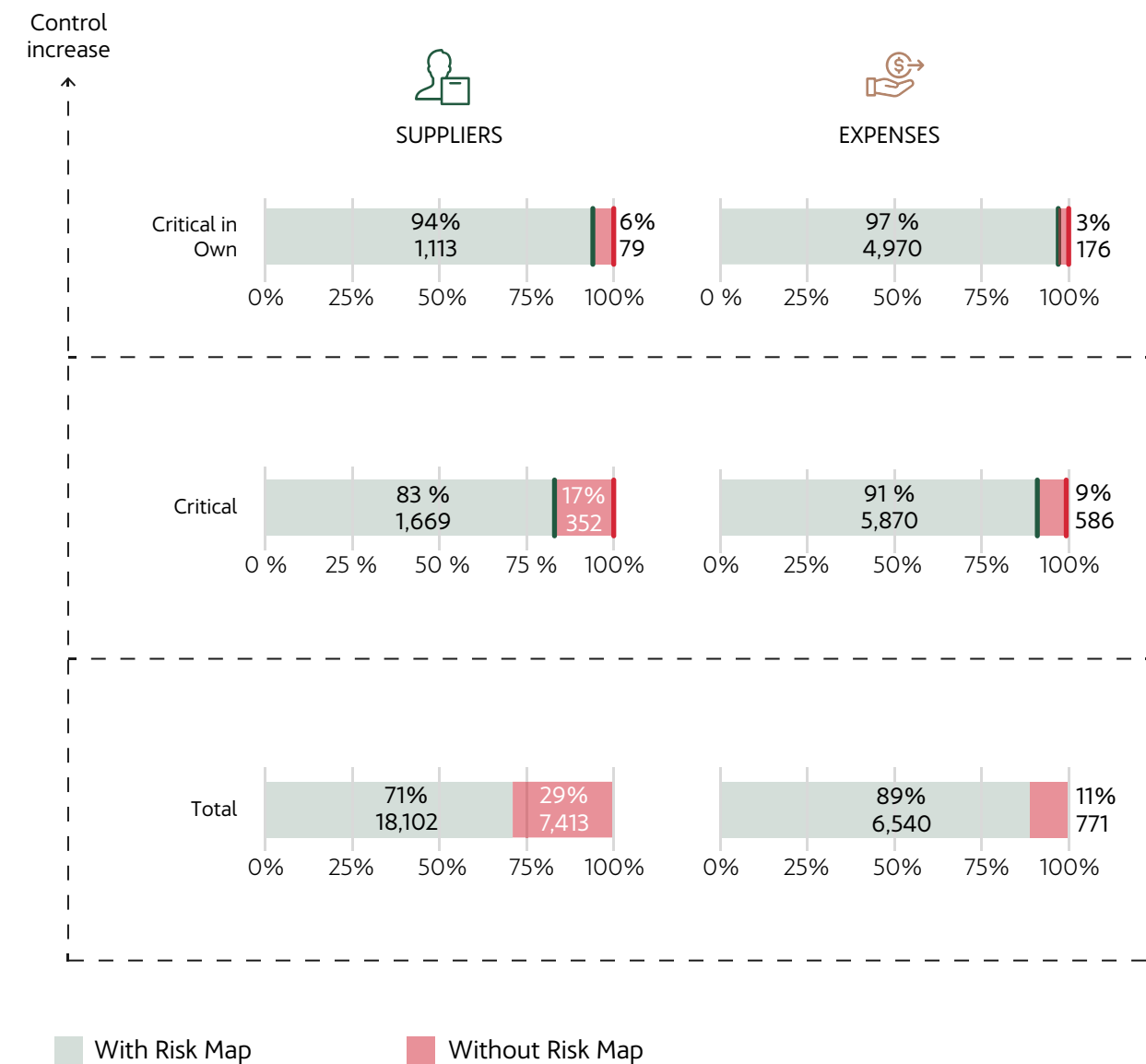
The supply chain management model aims to evolve not only towards detecting the risk, but also to develop suppliers' weaknesses, to align them with the group's policies and position them as best as possible.

→ DISTRIBUTION OF THE RISK OF ALL SUPPLIERS REGISTERED IN PROCUR-E



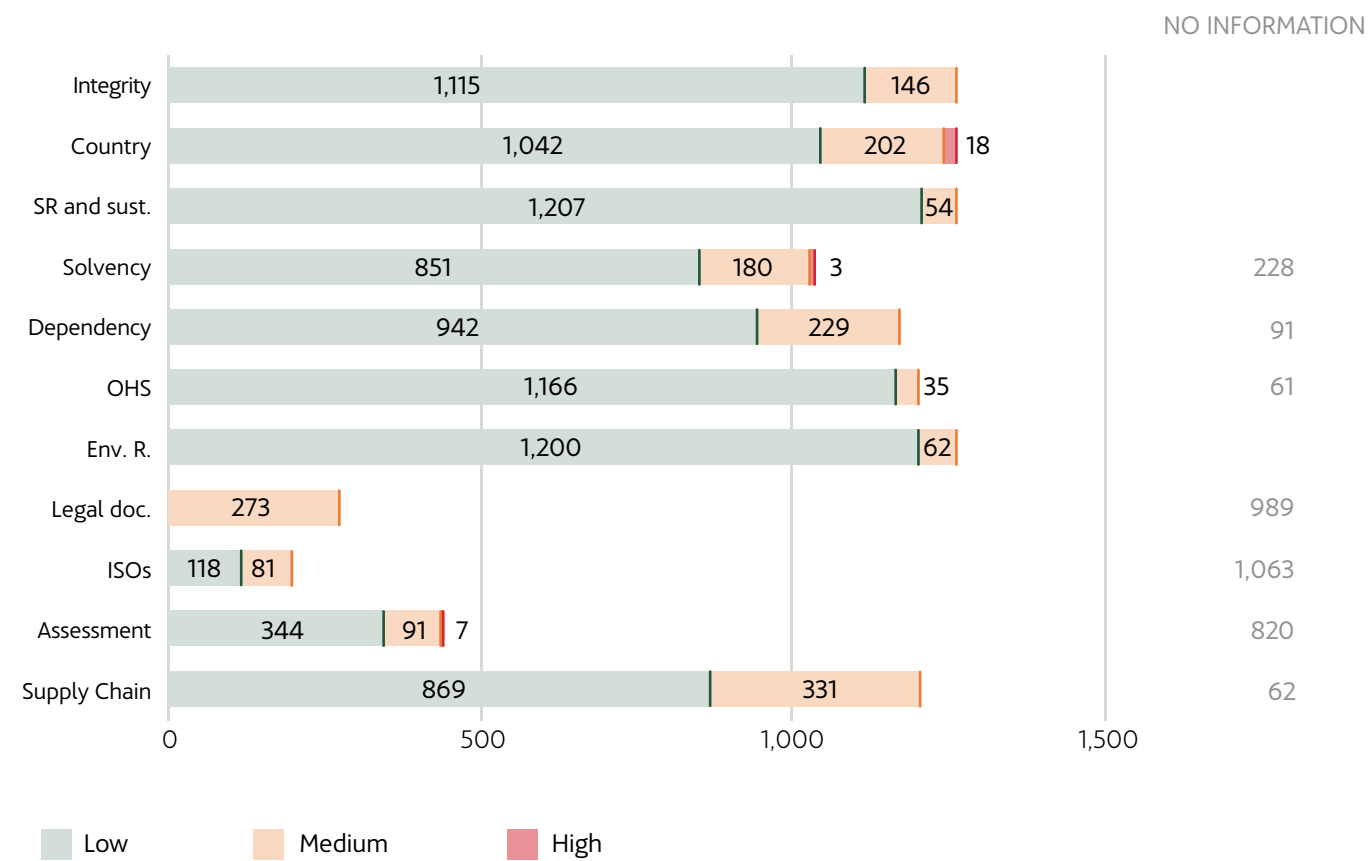
The percentage of critical suppliers in own construction who were validated in 2022 is 94.2%, which means an increase of nearly 8 points compared to 2021. As for the Risk Map, 93% of suppliers are registered in PROCUR-e. The other 7% have accepted the Statement of Compliance, but failed to complete their registration and, therefore, were unable to take part in tenders.

The critical suppliers with Risk Map who work in own construction (works controlled by ACCIONA) in 2022 amounted to 1,319, making up 97% of the total expenditure.



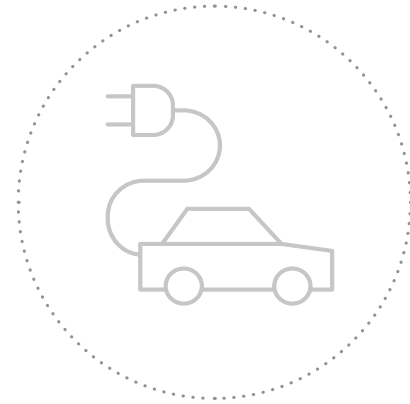


→ DISTRIBUTION OF THE VARIABLES OF THE RISK MAP IN CRITICAL SUPPLIERS IN OWN CONSTRUCTION



CONCLUSIONS OF THE RISK MAP

- 1 The distribution or level of risk has remained stable with respect to previous years, as 93% of suppliers have an average/low risk level.
- 2 The supply chain risk analysis model has been further consolidated, with greater visibility and scope. 20% more suppliers with Risk Map, which translates into 59,223 businesses monitored on a daily basis.
- 3 In 2022, the Risk Map for suppliers covered:
89% of total contracts.
91% of contracts with critical suppliers.
97% of contracts with critical suppliers in own construction.
- 4 As in previous years, there is no supplier with a high-risk integrity variable that has not been considered No-Go, since there are only two possible options for this type of business: avoid hiring them or conduct a Reinforced Due Diligence process that mitigates its risk.
- 5 54 critical suppliers with Medium Risk in corporate responsibility and sustainability were detected and the company will work with them to reduce their risk over the course of 2023.



INCENTIVES FOR SUSTAINABLE PRODUCTS

Besides its Sustainable Procurement Guide, available to all its suppliers and to be revised in 2023, ACCIONA has fostered the following initiatives in 2022:

→ SUSTAINABILITY CRITERIA IN PROCUREMENT AND CONTRACTING MANAGEMENT

	ECO-EFFICIENT VEHICLE FLEET	The operating fleet for executives consisted of 407 vehicles in 2022, of which 183 have emissions below 120 gCO ₂ /Km. 100% of the cars have EURO6 engines, 40.8% are hybrid vehicles, and 3.4% are electric vehicles, which means lower CO ₂ , NOx and particles. As for the service fleet, ECO or zero-emission vehicles increased by 226% in 2022, with 562 electric, hybrid, microhybrid and LPG/CNG vehicles now available, which brings down the average emissions of the fleet by 6% compared to 2021.
	RENEWABLE MATERIALS	3,066 tonnes of wood with chain of custody certification (FSC, PEFC, or similar) were purchased.
	CONTRACTING THROUGH SPECIAL JOB CENTRES	The contracts through 12 Special Job Centres promote the incorporation of people with disability into the job market. The expenditure amounted to almost two million euros over the year and the company made donations worth €260,000.

01 Measure what is important

This programme was completed successfully in 2022. It was designed to raise awareness and guide selected supplier SMEs along the process of knowing, measuring and improving their sustainability. Entirely subsidised by ACCIONA, 86 companies completed this programme.

As part of ACCIONA's feedback and reward philosophy, the companies who completed the programme were added to the Preferential Bidders List (PBL) in the corporate tenders system of PROCURE-e, and gained free access to 100% of the courses.

The Tenders tool on PROCURE-e identifies and promotes the suppliers on the PBL, which means they will be the first to be invited to tenders as top performers in ESG.

In 2022, all of these suppliers were given priority and entered into the new SCR model described above.

02 Programmes on sustainable development with strategic suppliers through the Category Managers

ACCIONA has shrunk its carbon footprint by 37% in two building projects in Spain by using state-of-the-art low-emission eco-friendly concrete and steel. These projects consist of the building of a state-owned school in Torrevieja (Alicante) and a quay for submarines in a military base (Arsenal Militar) in Cartagena (Murcia). In these projects, ACCIONA expects to prevent the emission into the atmosphere of nearly 980 tonnes of carbon dioxide (CO₂).

ACCIONA has acquired a handler and two electric dumpers to check their operating efficiency on site. The goal was to obtain knowledge and experience in the use of these machines, cutting down the CO₂ generated in the operations.