

Sustainable Purchase Guide

PMO - Supply Chain Management ACCIONA December 2024 Version 4.1



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OBJECTIVE

Define what a sustainable purchase is and how to identify it in order to provide buyers the necessary means to record all purchases that can be classified as sustainable and promote alternatives with a greater ESG impact, aligned with both the Sustainable Development Goals (SDGs) and the Sustainability Director Plan 2025 (PDS) objectives for the Supply Chain (and will be reviewed following the publication of the PDS 2030).



PDS objectives with a direct impact on purchases

- Develop a Scope 3 decarbonization strategy
- Identify zero carbon alternatives in all purchasing categories
- Ensure compliance of zero suppliers without due compliance

SCOPE

This document is applicable to all businesses included in Acciona's 2025 Sustainability Master Plan.

SUSTAINABILITY POLICY AT ACCIONA

ACCIONA'S PRINCIPLES

- Be agents of change ۰
- Address long-term sustainability ۰
- Ethical relationships •
- Be sustainable from the company's governance ۰
- Integrate sustainability in all business areas ۰
- Promote a culture of risk and opportunity management •
- Respect fundamental human rights ۰
- Create value for society •
- Take care of the environment •
- Fight climate change ۰
- Innovation as a business pillar ۰
- Dialogue with interest group •
- Transparency in communication and accountability ۰

Aligned with sustainable development objectives











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WHY WE SHOULD BUY SUSTAINABLE?

SUSTAINABILITY POLICIES AT ACCIONA

Acciona has a commitment as a group to achieve Net Zero by 2040 for its scope 1 and 2 emissions and by 2050 for its scope 3 emissions, scientifically validated by SBTi.

On the Acciona website you will find the policy book that is based on the company's mission, vision and values, and highlights the principles applicable to the company in economic, social, environmental and good governance matters.





REGARDING ISO 20400

"A sustainable purchase is one that has the greatest possible positive environmental, social and economic impact throughout the entire life cycle and that seeks to minimize adverse impacts."

A PURCHASE WILL BE LIKELY TO BE CLASSIFIED AS SUSTAINABLE IF...

The product is sustainable + The supplier is off the No-Go list The combination of the product and the supplier meet sustainability criteria in environmental and social matters, and in addition, the economic result of the transaction is competitive and transparent.

Suppliers on the No-Go list present ESG risk and are in Procur-e in red (with No Go or Not Valid status) or in gray (with High PROCUR-e status), see chapter 6.

The supplier is ESG Preferred Supplier

Three groups are identified within this category: Special employment centers, ESG top performer suppliers (chapter 6) and suppliers that, voluntarily, have participated in ESG training with Acciona. These suppliers have the "ESG Preferred Supplier" trigger in Procur-e.

HOW TO DETECT A SUSTAINABLE PRODUCT?

In ACCIONA, a product is considered sustainable if it meets any of the requirements established here. However, if a product that does not fit into these categories is presumed to be sustainable, it can be evaluated by Procurement and Sustainability department for its inclusion in the catalogue.

A ACCIONA SUSTAINABLE PRODUCTS CATALOGUE

ACCIONA has evaluated certain materials considering their CO₂ emissions using market data and taxonomy principles, as well as social aspects and life cycle analysis. This made it possible to establish a threshold from which a product can be considered sustainable.

Sustainability limits are specific to the company and all of them are included in the Sustainable Products Catalogue.



B SUSTAINABLE LABEL TYPE III

Materials without ACCIONA's own criteria are assessed using the Environmental Product Declaration (EPD), which quantifies the environmental impact through a life cycle analysis (LCA), verified by a third party. To be considered sustainable, they must be compared with the sectorial EPD and comply with the limits defined in the Sustainable Product Annex.

C SUSTAINABLE LABELS TYPE I

It is awarded to products that meet environmental standards defined by an independent organization. Platforms such as Ecolabel Index gather information on more than 450 ecolabels.



A product with this label is considered environmentally sustainable.



HOW TO DETECT AN ESG PREFERRED SUPPLIER?

To classify the supplier as an ESG Preferred Supplier, the following combination must occur:

SUPPLIER IS OFF THE NO-GO LIST AND BELONGS TO Supplier Management shares this list monthly with the A Minority, Disadvantage or Special Employment Center Purchasing Departments of each Business. The suppliers included in it present ESG risk and can be easily identified in Procur-e because they have the ESG top performer supplier following statuses: The supplier has been analyzed in ESG matters through our analysis and monitoring platforms and obtained green scoring in all its evaluations. No Go Ó An ESG-trained provider No Valid In recent years it has participated in training programs promoted by Acciona, such as: Alta Procur-e A potential risk has been detected, and the Pacto Mundial supplier has not completed the corresponding ed Española evaluation.

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GOOD PRACTICES EXAMPLES



Validate that the supplier's risk - if any - is monitored and mitigated through an improvement plan



Think strategically taking into account risks, = P

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Avoid surplus and waste in all purchasing processes

opportunities and life cycles

of the material that is acquired



Prioritize and acquire green options for raw materials (In: concrete, steel, etc.)



DURING PURCHASING PROCESS

In the tender phase, if the products have similar technical specifications, choose the supplier that has the ESG preferred supplier mark in Procur-e.

Mark sustainable purchasing in the systems.

Use the sustainable alternative material code

Include sustainable purchasing clause.

If there is any doubt as to whether a purchase is sustainable, the sustainable purchasing or sustainability team should be consulted.

Review the evidence presented in the supplier's due diligence before marking the sustainable purchase