ACCIÓN’S GREEN FINANCING FRAMEWORK

FINANCING LOW-CARBON PROJECTS USING THE EUROPEAN COMMISSION SUSTAINABLE FINANCE DOCUMENTS AS REFERENCE STANDARD*

NOVEMBER 2019

*TECHNICAL EXPERT GROUP ON SUSTAINABLE FINANCE REPORT EU GREEN BOND STANDARD
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1. STRATEGY AND RATIONALE

Introduction

Achieving the United Nations Sustainable Development Goals (SDGs) will likely require an estimated US$2.4tn per year of additional investment, especially for infrastructure (1.5tn-2tn) and other projects with long payback periods. Global investment in sustainable infrastructure is required to meet 72% of the SDGs as well as to achieve the United Nations 2030 Agenda.

ACCIONA represents a special case in that it invests in what it builds and operates — in long-term growth megatrends — be it renewable energy, social infrastructure, transport, housing, water, waste treatment or any of its other technical capabilities.

In alignment with ACCIONA’s strategy and purpose, this Green Financing Framework combines sustainable financing and sustainable investment projects. The company develops business opportunities capable of generating interest in the investment market, and this new Green Financing Framework facilitates decisions by investors interested in designing a better planet.

ACCIONA’s Green Financing Framework has been developed in line with the European Union Green Bond Standard (EU-GBS) produced by the EU Technical Expert Group (TEG) on Sustainable Finance (June 2019). The EU-GBS is a voluntary standard proposed to issuers that wish to align with best practices in the market. It is designed to be globally relevant and accessible to issuers located both inside and outside the EU. It builds on market best practices such as the Green Bond Principles by ICMA and the Green Loan Principles by LMA.

This new Green Financing Framework will help channel investment to company projects that contribute to the global sustainable agenda. ACCIONA also uses another sustainable financing format where the cost of funding is linked to improvements in ACCIONA’s sustainable performance.

1.1. STRATEGY FOCUSED ON CLIMATE EMERGENCY AND LOW-CARBON ACTIVITIES

ACCIONA has avoided 130 million tonnes of CO₂ in the last 8 years, having increased avoided emissions from 11.4 to 14.7 million tonnes of CO₂ per year.

Mitigating climate change continues to be one of the main objectives of ACCIONA’s strategy. The company is constantly reviewing its strategic orientation in the light of climate impacts, in particular. Between 2010 to 2018, ACCIONA reduced its carbon intensity from 169 to 58 tonnes of CO₂ per million euro of revenues.

The company views the Paris Agreement as a good framework for action, but believes greater ambition is necessary to face this climate crisis. For this reason, ACCIONA has been a carbon-neutral company since 2016, thirty years before the best expectations for achieving this goal worldwide (about 2050).

The company put a carbon price on its operations worldwide in order to offset all the CO₂ emissions that it could not abate. In 2018, the company also managed to reduce its emissions by 7% compared to the previous year.

ACCIONA has also set specific, increasingly stringent objectives for reducing emissions. In this case, the company has aligned with science through the adoption of the international initiative Science Based Targets (SBTi). In this way, all future efforts are verified to be aligned with the 2 °C scenario set out in the Paris Agreement. In 2019, we intend to progress along this demanding path, setting our sights on objectives aimed at preventing an increase of more than 1.5 °C.

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4 ACCIONA’s Sustainable Finance strategy is explained on the corporate website: https://www.acciona.com/sustainability/sustainable-finance/

5 GHG inventories have been verified externally by an accountancy firm since 2010 using ISO 14064 and ISAE 3000. GHG Inventories are published in the ACCIONA annual sustainability reports (approved by the Board and the Annual Shareholder Meeting) and CDP reports.
Beyond the commitment to be carbon neutral, which is already fulfilled, the ACCIONA’s Sustainability Master Plan$^4$ (SMP) sets a number of objectives for 2020 to address the climate emergency and to protect the environment. The mainly consist of developing climate change adaptation and risk management plans, drawing up climate change risk maps and training professionals in the management of climate risks. Regarding environment protection, the company has set environmental goals such as response to water stress, improvement of water consumption efficiency, promotion of the circular economy and conservation of biodiversity.

**Low-carbon activities**

The sustainable agenda transcends traditional economic sectors in the search for effective solutions. It represents a new sector strategically positioned to meet the needs and opportunities of the transition to a low-carbon economy as well as the sustainable agenda defined by the SDGs. In this group of low-carbon companies, investors can find renewable energy, sustainable mobility, water management and resilient cities infrastructure, classified by their contribution to the 1.5 °C scenarios.

Policy is already moving in this direction. In France, UK, Spain and Portugal, formerly sector-specific ministries have merged policies and programmes around the energy transition and/or the 2030 Agenda. The G20 has formalised this approach.

The EU is in the process of identifying economic activities that contribute to a low-carbon economy in order to implement measures to accelerate the transition towards it. ACCIONA welcomes this new classification of economic activities, which brings visibility to companies, like ACCIONA, that develop infrastructure solutions to strengthen the low-carbon economy and fulfil the goals of the 2030 Agenda.

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An analysis of ACCIONA’s activities\textsuperscript{6} shows they fit into five macro-sectors established by the EU Taxonomy (18\textsuperscript{th} June 2019). The groups identified are as follows:

\textbf{Figure 1. ACCIONA’s activities in the EU Taxonomy macro-sectors}

\textsuperscript{6}This analysis was performed in September 2019 by Deloitte applying the draft EU Taxonomy and their external independent criteria.
Once the criteria, metrics and thresholds of each subcategory were analysed, ACCIONA’s activities were aligned with the taxonomy in terms of overall revenue, EBITDA, and annual CAPEX using 2018 figures:

Figure 2. ACCIONA’s financial figures aligned with the EU Taxonomy – 2018 figures
Once the business areas’ general alignment with the Taxonomy’s criteria and metrics had been analysed, the activities were classified as “eligible” or “green”, and the revenue, EBITDA and CAPEX for 2018 associated with those activities, together with their relative importance in terms of ACCIONA’s total business, were estimated.

The new EU taxonomy for the low-carbon economy drives ACCIONA’s strategy. The company’s main investments are, and will continue to be, focused on low-carbon activities.

1.2. SUSTAINABILITY REPORTING AND RATINGS

ACCIONA reports its sustainability performance in accordance with international reporting frameworks. This information is published each year and made available to all its stakeholders through the corporate website.

The Sustainability Report is the main document in this connection, containing significant non-financial information for all stakeholders and reporting on the progress with, and challenges facing, the sustainability strategy.

Since 2012, the report has been submitted to the General Shareholders’ Meeting for review and approval. The company uses the Global Reporting Initiative (GRI) Standards as its benchmark, aligns its climate reporting with recommendations from the Task-force on Climate-related Financial Disclosures (TCFD), and gives expanded disclosures about its contributions to the SDGs in the main regions where it operates.

The Integrated Report is produced in accordance with the International Integrated Reporting Council (IIRC) framework. It concisely sets out the ability to forecast, adapt and generate value from the company’s activities, focusing on both the performance and results as well as on the challenges and opportunities that may arise within the context in which it operates. This report offers a look into the future of ACCIONA’s business model and describes how the strategy helps to create value in the short, medium and long term.

ACCIONA interacts regularly with research firms, ratings agencies and investors interested in hearing about the company’s environmental, social and corporate governance (ESG) performance and its business model.

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2. PROCESS FOR SELECTION OF GREEN PROJECTS

2.1. PROJECT EVALUATION AND SELECTION

All projects that are financed and/or refinanced with proceeds from green financing instruments are selected by ACCIONA’s Sustainable Finance Committee and are evaluated on a quarterly basis. This Committee comprises professionals from ACCIONA’s Finance and Global Sustainability departments, as well as Sustainability representatives from ACCIONA’s business lines and project managers and other parties who are selected as subject matter experts.

The Committee is responsible for verifying compliance by all projects with the eligibility criteria based on contribution by ACCIONA’s green projects to the environmental objectives contemplated in the EU Taxonomy.

As the EU taxonomy evolves, ACCIONA is committed to evolving its eligibility criteria in line.

These projects contribute to specific objectives related to climate change mitigation and adaptation, comply with the minimum social safeguards and do not significantly impair any of the other EU Commission objectives. In addition, ACCIONA applies a set of minimum ESG requirements (Policy Book approved by the Board of Directors Sustainability Committee), applicable EU and national environmental and social regulations to all its activities, including those financed with the proceeds from green financing instruments.
3. GREEN PROJECTS

3.1. USE OF PROCEEDS

ACCIONA intends to allocate the proceeds from green financing instruments to finance or refinance the portfolio of eligible green projects, assets or services within the categories under the EU Taxonomy.

Figure 3. ACCIONA’ Eligible green projects, assets or services under EU Taxonomy

<table>
<thead>
<tr>
<th>EU Taxonomy NACE Macro-Sector</th>
<th>EU Taxonomy Sub-Sector description (ACCIONA’s projects)</th>
<th>NACE Level (Code)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Electricity supply</strong></td>
<td>Construction and operation of electricity generation facilities that produce electricity from wind power.</td>
<td>4 (D.35.1.1)</td>
</tr>
<tr>
<td></td>
<td>Construction and operation of electricity generation facilities that produce electricity from solar photovoltaic.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Construction and operation of electricity generation facilities that produce electricity from concentrated solar power.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Construction and operation of electricity generation facilities that produce electricity from bioenergy (thermal generation from burning agricultural and forestry waste).</td>
<td></td>
</tr>
<tr>
<td><strong>Transportation and storage</strong></td>
<td>Infrastructure for low-carbon transport: Construction of railways and underground railways.</td>
<td>4 (F42.1.1, F42.1.2, F42.1.3)</td>
</tr>
<tr>
<td></td>
<td>Passenger cars, light commercial vehicles and category L vehicles (zero tailpipe emission vehicles).</td>
<td>_</td>
</tr>
<tr>
<td><strong>Water, sewerage, waste and remediation</strong></td>
<td>Centralized wastewater treatment systems (including collection and treatment), substituting untreated wastewater discharge or treatment systems that causing high GHG emissions (e.g. onsite sanitation, anaerobic lagoons).</td>
<td>4 (E37.0.0)</td>
</tr>
<tr>
<td></td>
<td>Water collection &amp; treatment and supply with high energy efficiency of the system(^{12}).</td>
<td>4 (E36.0.0)</td>
</tr>
<tr>
<td></td>
<td>Separate collection and transport of non-hazardous waste in single or commingled fractions aimed at preparing for reuse and/or recycling.</td>
<td>4 (E38.1.1)</td>
</tr>
<tr>
<td><strong>Construction and real estate activities</strong></td>
<td>Construction of new buildings (with green building certification(^{14})): This relates primarily to activities under NACE codes F41.1 - Development of building projects’ and F41.2 - Construction of residential and non-residential buildings, but also includes activities under NACE code F43 - Specialised construction activities.</td>
<td>2 (F41, F43)</td>
</tr>
</tbody>
</table>

Examples of ACCIONA’s eligible green projects, assets or services under the EU Taxonomy are provided in Annex I: Categories and Examples of Current Eligible Projects developed by ACCIONA that are covered by the EU Taxonomy.

In line with the EU Green Bond Standard, ACCIONA has established a lookback period of 36 months for the refinancing of activities (before the issuance date of the respective instrument).

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\(^{12}\) Facilities operating with life cycle emissions lower than 100gCO\(_2\)e/kWh

\(^{13}\) EU Taxonomy threshold: The front-to-end water supply system has a high degree of energy efficiency characterized by: an average energy consumption of the system (including abstraction, treatment and distribution) of 0.5 kwh per cubic meter billed/unbilled authorized water supply or less.

\(^{14}\) ACCIONA has long been committed to certifying all its new developments with the BREEAM sustainable seal. Its goal is to achieve a score of “Good” or higher for all of its residential projects. In fact, the company has reached almost 70% of the certified projects with a score of “Very good”. In addition, ACCIONA certifies the new non-residential buildings with other kind of sustainability seals (LEED with a score of “Gold” or higher).
4. TRACKING OF AMOUNTS OF USE OF PROCEEDS

4.1. MANAGEMENT OF PROCEEDS

ACCIONA’s Finance Department intends to allocate the proceeds from green financing instruments to an eligible green project portfolio in different ways:

• Financing projects, assets or services. These projects can be newly-built or existing but can also include refurbishments.
• Refinancing projects, assets or services under development or operation.

Green projects are selected in accordance with the use-of-proceeds criteria and the evaluation and selection process presented above, prioritising current or more recent projects. ACCIONA will establish a register to track investments in eligible projects.

ACCIONA will strive, over time, to achieve a level of allocation for the eligible green project portfolio, which, after adjustments for intervening circumstances (including, but not limited to, sales and repayments), matches the balance of net proceeds from its outstanding green financing instruments. Additional eligible green projects will be added to the issuer’s eligible green project Portfolio to the extent required to ensure that the net proceeds from outstanding green financing instruments are allocated to eligible green projects.

While any net proceeds from green financing instruments remain unallocated to the eligible green project portfolio, ACCIONA will hold and/or invest such proceeds, at its own discretion, in its liquidity portfolio, in cash or short-term liquid instruments, or use them to repay a portion of its outstanding indebtedness.

5. REPORTING

The EU-GBS requires issuers to provide information on the allocation of proceeds. In addition to the information on the projects to which the proceeds from green financing instruments have been allocated, the EU-GBS recommends disclosing the expected impact of the projects.

After one year has elapsed from the issuance of the applicable green financing instruments, ACCIONA will draw up and keep readily available information on the allocation of net proceeds to the eligible green project portfolio and, wherever feasible, information on the impact of the eligible green project portfolio, at least at the category level, and will update that information annually until full allocation of the net proceeds from green financing instruments.

The company intends to provide aggregated reporting for all of ACCIONA’s green financing instruments and any other outstanding green financing.

Allocation Reporting and Impact Reporting will be published on ACCIONA’s website, including unallocated amounts. The Green Financing Framework, Final Allocation Report and Impact Report published upon full allocation will remain available until the maturity of such green financing instruments, unless replaced by further reports in the event of material changes of allocation.

The allocation report will provide:

• A statement of alignment with the version of EU-GBS report;
• A breakdown of amounts allocated to the projects (new financing and refinancing);
• The regional distribution of the projects.

Please see the information on the corporate website, Sustainable Finance section: https://www.acciona.com/sustainability/sustainable-finance/
The impact report may provide:

- A general description of the projects;
- The EU Taxonomy Environmental Objective pursued with the projects;
- A breakdown of Green Projects by the nature of what is being financed (assets, capital expenditures, operating expenditures, etc.);
- The share of financing;
- Information and, when possible, metrics about the projects’ environmental impacts. ACCIONA will make its best efforts to align the reporting with the portfolio approach described in the ICMA Harmonized Framework for Impact Reporting.
- Information on the methodology and assumptions used to evaluate the impact of green projects.

The type of indicators will depend on the type of project, asset or service financed by the green instrument.

Figure 4. Example of reporting indicators per asset category

<table>
<thead>
<tr>
<th>EU Taxonomy NACE</th>
<th>EU Taxonomy Sub-Sector description (ACCIONA’s projects)</th>
<th>Benefits (EU Taxonomy Environmental Objective)</th>
<th>Qualitative and quantitative impact metrics</th>
</tr>
</thead>
</table>
| Electricity supply | Production of electricity from wind power | Climate mitigation | • Installed renewable energy production capacity (MW)  
• Estimate of avoided emissions (CO₂e)  
• Average annual clean energy production in terms of equivalent electricity demand (number of homes)  
• Creation of stable jobs (number) |
|                      | Production of electricity from solar PV | Climate mitigation                                      |                                            |
|                      | Production of electricity from concentrated solar power | Climate mitigation                                      |                                            |
|                      | Production of electricity from bioenergy | Climate mitigation                                      |                                            |
| Transportation and storage | Infrastructure for low-carbon transport | Climate mitigation | • Improve public transport systems, limiting pollution and easing congestion in major cities.  
• Improve connections |
|                      | Passenger cars and commercial vehicles | Climate mitigation | • Emissions reduction (CO₂)  
• Electrification and decarbonisation of the economy  
• Promotion of alternative means of transportation  
• Public space release |
| Water, sewerage, waste and remediation | Centralised wastewater treatment systems | Climate mitigation | • Emissions reduction (CO₂)  
• Pollution reduction  
• Access to improved sanitation (number of people) |
|                      | Water collection & treatment and supply | Climate mitigation and adaptation | • Emissions reduction (CO₂)  
• Access to drinking water (number of people) |
|                      | Separate collection and transport of non-hazardous waste in source-segregated fractions | Climate mitigation and adaptation | • Emissions reduction (CO₂)  
• Conservation and improvement of urban spaces (m²) |
| Construction and real estate activities | Construction of new buildings | Climate mitigation | Design and construction of buildings follows sustainability guidelines (sustainable certification) |

Examples of ACCIONA’s qualitative and quantitative impact metrics for Eligible Green Projects, assets or services under EU Taxonomy are provided in the Annex I: Categories and Examples of Current Eligible Projects Developed by ACCIONA that are covered by the EU Taxonomy.

5.1. EXTERNAL REVIEW

Second-Party Opinion (pre-issuance)

ACCIONA’s Green Financing Framework has been reviewed by Sustainalytics, which issued a Second-Party Opinion confirming the alignment of the Framework with the Green Bond and Green Loan Principles. The Second-Party Opinion and the Green Financing Framework will be made available to the investors in green financing instruments in the Sustainable Finance and Debt Issuances sections of the corporate website.

Verification (post-issuance)

One year after issuance or after full allocation, ACCIONA intends to request verification by its external auditor of a management statement on the allocation of the proceeds from green financing instruments to the eligible green project portfolio. This external assurance statement will be published annually no later than the same date as ACCIONA’s General Shareholders Meeting.

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### ANNEX I: CATEGORIES AND EXAMPLES OF CURRENT ELIGIBLE PROJECTS DEVELOPED BY ACCIONA THAT ARE COVERED BY THE EU TAXONOMY

<table>
<thead>
<tr>
<th>ACCIONA landmark projects per EU Taxonomy Sub-Sector</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Production of electricity from wind power</strong></td>
<td></td>
</tr>
</tbody>
</table>
| **Oaxaca Wind Power Complex (Mexico):** One of the largest wind farms in Latin America, consisting of three wind farms (Oaxaca II, III and IV), with 306 MW of operational capacity. | - Electricity production equivalent to the needs of 700,000 Mexican homes.  
- It avoids the emission of 670,000 tonnes of CO$_2$ annually, equivalent to 33.5 million trees. |
| **Production of electricity from solar PV**          |  |
| **Puerto Libertad Photovoltaic Plant (Mexico):** The biggest renewables project ever undertaken by ACCIONA anywhere in the world, and will become operational during 2019. | - Average annual power production of 963 GWh, equivalent to the electricity demand of 583,000 Mexican homes.  
- Site area of 10 km$^2$, with 2.4-km$^2$ solar capture area, equivalent to 333 soccer fields.  
- Over 925,000 tCO$_2$ avoided per year.  
- 500 jobs created during the construction phase, with up to 900 workers during peaks. |
| **Production of electricity from Concentrated Solar Power** |  |
| **Nevada Solar One CSP Plant (United States):** A 64 MW plant located in the Nevada Desert (US), grid connected in 2007. | - Average annual production: 136 GWh, equivalent to the demand from around 15,000 homes.  
- 29,000 metric tonnes of CO$_2$ avoided per year.  
- 800 jobs created in the construction phase and around 30 for the operation of the plant  
- Built in the desert in record time: 13 months.  
- Site: 130 hectares including 760 parabolic trough solar collectors and 182,000 mirrors (76 kilometres long).  
- ACCIONA proprietary technology used for the solar collectors.  
- Customers: Nevada Power Company and Sierra Pacific Resources. |
| **Production of electricity from bioenergy**         |  |
| **Sangüesa biomass plant (Spain):** 30-MW plant located in Navarra (Spain) and in service since 2002. It was the first biomass plant installed by ACCIONA. | - Average annual production: 200 GWh, equivalent to the electricity demand of around 60,000 homes.  
- 192,000 metric tonnes of CO$_2$ avoided per year. |
| **Infrastructure for low–carbon transport**         |  |
| **Quito Metro (Ecuador):** The suburban section of the first metro line in Ecuador’s capital city is 22 km long and includes 13 new stations in addition to the two already built by ACCIONA. The project represents a saving of US$ 50 million per year in fuel costs by improving the mass transit system, with the resulting reduction of 67,000 metric tonnes of CO$_2$. |  |
### ACCIONA landmark projects per EU Taxonomy Sub-Sector

#### Passenger cars and commercial vehicles

**ACCIÓN Mobility (Spain and Portugal):** In 2018, ACCIONA took up the challenge of sustainable mobility with the launch of a shared scooter service available in the cities of Madrid, Valencia, Hospitalet de Llobregat (Barcelona), Seville and Lisbon.

- Zero emissions scooters that run on electricity certified as 100 %-renewable origin.
- Electric machinery and vehicle fleet to transport and service the bikes and their batteries.

#### Centralized wastewater treatment systems

**La Chira WWTP (Peru):** Currently under construction, the plant will contribute to solving Lima’s sanitary and environmental problems caused by the effluent of the Surco and Circunvalación sewers, which discharge directly into the ocean without any treatment. In addition to improvements in sanitation, this activity reduces emissions and pollution.

- Capacity: 544,320 m$^3$/d.
- Equivalent population: 2.5 million people.

#### Water collection & treatment and supply

**Orduña WTP (Spain):** An operation and maintenance project at the water treatment plant in Orduña, Vizcaya (Spain). In addition to improvements in water access, the plant is certified under ISO 50001 in order to improve the energy efficiency and to reduce emissions.

- Capacity: 1,900 m$^3$/d.
- Equivalent population: 480 people.

#### Separate collection and transport of non-hazardous waste in source-segregated fractions

**Waste collection services in the east of Madrid (Spain):** As part of a joint venture with Valoriza, OHL and Ascan, ACCIONA’s service business collects waste in the districts of Hortaleza, Barajas, San Blas-Canillejas, Ciudad Lineal, Vicálvaro, Moratalaz, Salamanca, Chamartín and Retiro.

- This contract includes the first 100 % electrical waste collection lorry in the capital.
- Service provided for over 1,158,429 people.

#### Construction of new buildings

**ACCIÓN Inmobiliaria:** With over 25 years of experience in its sector, ACCIONA Inmobiliaria is one of the leading residential development and management companies in Spain, having developed more than 9,000 homes throughout Spain, Portugal, Poland, and Mexico. ACCIONA Inmobiliaria has long been committed to certifying all its new developments with the BREEAM sustainable seal. Its goal is to achieve a score of “Good” or higher for all of its residential projects. In fact, the company has reached almost 70 % of the certified projects with a score of “Very good”. In addition, ACCIONA certifies the new non-residential buildings with other kind of sustainability seals (LEED with a score of “Gold” or higher).