



PRIVACY POLICY

ETHICAL CHANNEL
ACCIONA GROUP



ETHICAL CHANNEL OF ACCIONA GROUP

In compliance with Personal Data Protection regulations in force, data subjects and other affected persons are hereby informed that the personal data collected through the Ethical Channel will be processed by:

- Acciona, S.A., (hereinafter "ACCIONA") as the parent company and principal responsible for the Group's Compliance Department and, therefore, for the compliance with the Code of Conduct and other internal regulations of ACCIONA Group. ACCIONA's identification data are:
Tax identification num. (CIF): A08001851
Address: Avenida de Europa, number 18, Parque Empresarial La Moraleja, 28108 de Alcobendas (Madrid). Telephone: 916632851.
Contact: accionacorp@acciona.com.
- The ACCIONA Group company in relation to which the events are reported and with which the data subject has a direct relationship. The composition of the ACCIONA Group companies can be consulted at any time in the Annual Report of the last consolidated annual accounts of ACCIONA (<https://www.acciona.com/shareholders-investors/financial-information/annual-accounts/>)

Data subjects can contact ACCIONA Group's Personal Data Protection Department, at the address Avenida de Europa 18, 28108 Alcobendas (Madrid), or at the email address protecciondedatos@acciona.com

The processing of personal data collected through the Ethical Channel has the sole purpose of investigating the facts that are reported, thus ensuring the regulatory compliance of ACCIONA Group; being the legal basis of such processing the fulfillment of a Data Controller's legal obligation.

For this purpose, the interested parties must provide all the data and information that is adequate, relevant and is strictly related to the fact that is intended to be communicated through the Ethical Channel, avoiding all personal information that could be excessive, inappropriate or highly subjective. The Ethical Channel, only those personal data that are essential to investigate the reported fact will be processed. The Ethics Channel may request an extension of information if the information provided is insufficient to carry out the purpose of this processing

Likewise, all personal data related to health or biometrics, trade-union membership, ethnic or racial origin, political or religious convictions, political opinions, as well as data regarding sexual life or sexual orientation should also be avoided, as long as they are not relevant to the fact to be reported. The data subjects assume the responsibility for the veracity and accuracy of the data provided.

The use of the Ethical Channel requires to recall that the imputation of facts, knowing their falsehood or with reckless disregard for the truth, may lead to criminal or civil liability under the terms contemplated in the current legislation.

The data will be stored for the time necessary for the processing of the internal investigation measures deemed necessary and, when applicable, when the appropriate contractual, disciplinary or judicial measures are applied. Subsequently, a control will be implemented in the application or in the database, in order to prevent the processing of the data, being able to access to the same if requested by the Public Administrations, Judges and Courts to fulfil possible responsibilities, and only during the statute of limitation of these responsibilities. The

personal data of the dismissed communications will be stored for a maximum period of three months (or six months in case of exceptional circumstances).

The data received through the system may be communicated to advisors, collaborators and service providers who participate in or support the investigation and processing of the files of the facts communicated through the Ethical Channel. In the event that after other investigative work or the adoption of measures are required, the data may be transferred to employees, departments or business units of other ACCIONA Group companies that could be involved and / or affected.

In both cases, some of these third parties or Group companies may be located outside the European Union, including countries in which the applicable legal level of data protection is not comparable to the level of data protection that applies within the EEA, which implies a possible international transfer of data. In any case, such transfers are legitimate and are covered by one of the guarantee mechanisms established by current legislation on data protection, such as having a recognized legal adjustment mechanism, and always with respect for confidentiality, integrity and security of the same.

Data subjects are informed that appropriate measures have been taken to ensure that the identity of the complainant is confidential and is not disclosed to the accused or other affected persons. However, it is reported that it may be necessary to disclose your identity to the persons involved in the investigations or in the subsequent administrative or judicial proceedings initiated as a result of the investigation carried out.

Data subjects may exercise their rights of access, rectification, erasure and portability of their data, as well as the limitation or opposition to their processing, by writing to the Personal Data Protection Department, located at Avenida de Europa 18, 28108 Alcobendas (Madrid), or by sending an email to protecciondedatos@acciona.com; or to the mailbox people.privacy@acciona.com in case the data subject or affected person is an employee of ACCIONA Group. In all cases, the subject should indicate "ETHICAL CHANNEL" and, if we consider it necessary to identify the interested party, we may request a copy of an identity document. Likewise, data subjects may present a interested parties will have the right to complaint to the relevant Data Protection Control Authority (<https://www.agpd.es/portaleswebAGPD/index-ides-idphp.ph>) and, in particular, to the Spanish Data Protection Agency (www.aepd.es). For more information about the processing of personal data at ACCIONA, interested parties can consult our Privacy Policy at <https://www.acciona.com/privacy-policy/>.