

	Document Title	Document Number		
	Sustainability Policy	AINA-QES-SUS-POL-0001		
		Revision:	0	Date:

Acciona Infrastructure North America

Sustainability and Social

Sustainability Policy

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The signatures below indicate that (i) this document has been reviewed and accepted, and (ii) the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	PREPARED BY	REVIEWED BY	APPROVED BY
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Position:	-	Director of Quality, Environmental and Sustainability	President and Country Director
Date:	-	2021-02-26	2021/03/25
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REVISION HISTORY			
Version	Revision Date	Pages Revised	Description of the Revision
0	2021-02-26	NA	Initial Issue

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COMMITMENTS

Acciona Infrastructure North America (ACCIONA)'s commitment to sustainability focuses on social progress, environmental balance and economic growth. As part of a global company, Acciona Infrastructure North America strives to respond to the main challenges facing society by providing, infrastructure, water, road maintenance and services. With sustainable development as the focal point of its businesses, the organization is capable of generating long-term shared value for its different stakeholders. ACCIONA follows the 10 principles of the United Nations Global Compact on human rights, labour, the environment, and anti-corruption. ACCIONA's commitment to sustainability is also reflected in its contribution to meeting the 17 United Nations Sustainable Development Goals.

PRINCIPLES

- **Agent of change** - Through its sustainability strategy, ACCIONA responds to the global challenges and trends that affect its businesses by providing solutions to the main needs of society.
- **Long term** - ACCIONA understands that sustainability is a long-term commitment that reinforces the principles of economic and financial stability.
- **Ethics** - ACCIONA requires that all of its relationships with third parties be conducted with ethical behaviour, honesty, integrity and transparency.
- **Governance** - ACCIONA's efforts in sustainability are driven and spearheaded by the company's senior-level management through its Executive Committee.
- **Integration of sustainability** - ACCIONA understands that sustainability must be present in all areas of the business and on every organizational level of the company, while transmitting this culture to customers, suppliers, partners, communities and other stakeholders.
- **Culture of risk and opportunity management** – ACCIONA encourages the inclusion of results from risk and opportunity analyses and assessments when strategizing and making decisions.
- **Respect for fundamental human rights** – ACCIONA respects and contributes to the protection of internationally recognised fundamental human rights by making sure it is not complicit in any kind of abuse or violation of those rights.
- **Creating value for society** – ACCIONA strives to bring value to the geographical areas in which it operates by developing business models that contribute to local social development and improvement to people's quality of life.
- **Caring for the environment** – ACCIONA takes a preventive approach to reduce the impact of its operations, seeking the highest level of environmental efficiency in all of the projects it undertakes.
- **Fighting climate change** – The fight against climate change is a strategic priority for ACCIONA, promoting energy efficiency, mitigating the adverse effects of climate change, and offering coping strategies.
- **Innovation** – ACCIONA fosters innovation as one its pillars of business development, promoting the search for sustainable solutions at a technological and operational level.

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- **Dialogue with stakeholders** – Communication and dialogue are the foundation of ACCIONA’s relationship with its stakeholders that aims to understand their needs and meet their expectations.
- **Transparent communication and accountability** – ACCIONA provides its stakeholders with information that is transparent, truthful and accurate.

RESPONSIBILITIES

ACCIONA’s Senior Management shall provide the leadership, organization and resources necessary for the effective implementation of this policy. Managers, Supervisors, Staff, Contractors, Suppliers and interested parties, if appropriate, must adhere to this policy and the entire Sustainability Management System for all work related to the ACCIONA’s scope of work or applicable project agreements. ACCIONA’s management and contract or projects leadership teams must identify, understand and implement actions to address risks and opportunities when planning and executing work. Planning and execution of work must align with the Corporate Sustainability Master Plan, Sustainability Policy¹, relevant project agreements, standards and best industry practices.

COMMUNICATION AND MAINTENANCE

This policy shall be available and maintained as documented information. It is communicated, understood and applied to all ACCIONA personnel, subcontractors and suppliers and be available to relevant interested parties, as appropriate.



Carlos Planelles Fernandez
 President and Country Director
 Acciona Infrastructure North America

¹ Acciona Corporate Sustainability Policy issued by Sustainability Committee on April 19, 2018.