

ACCIONA GENERAL COMMUNICATION POLICY

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1. GENERAL COMMUNICATION POLICY GENERAL PRINCIPLES.

The Board of Directors is responsible for managing and supervising the Acciona general communication policy at the highest level. This policy contains the information and communication procedures for financial, non-financial and corporate information over the channels specified below. Accordingly, it contributes to maximising the dissemination and quality of the information made available to the market, institutional investors and shareholders, as well as to proxy advisors, the markets, the press and public opinion in general, including the information content provided by the web page.

With a view to engaging more fully with its national and foreign shareholders and investors, and to fostering transparency with regard to the information about the Group that is made public, this policy has been established, which is governed by the following general principles:

- Transparency, truth, immediacy and uniformity in the dissemination of information, so that shareholders and the different stakeholders receive all the legally required financial and non-financial information, and any other that may be considered of use, both clearly and conveniently.
- Provide information about those matters that may be needed for them to properly exercise their rights as shareholders, facilitating access to clear and direct channels and lines of communication that will make it possible to clarify any doubts about the information they have been given.

- Publish information periodically, conveniently and permanently, thereby keeping shareholders and investors alike up-to-date about the most important Group affairs at any given time over the most effective channels for receiving any such information.
- Equal treatment of all shareholders and investors who find themselves in the same position with regard to information, participation and the exercise of their rights as shareholders and investors.

Always mindful of the aforementioned principles of equal and non-discriminatory treatment of all shareholders, Acciona may adapt the information, communication and contact channels used depending on the different recipients and their needs which may, at any given time, be detected for these purposes.

- Use a variety of communication instruments and channels that contribute to maximising the dissemination and quality of the information made available to the market, investors and other stakeholders, leveraging the advantages offered by the new technologies, which enable shareholders and other stakeholders to engage more easily and conveniently with Acciona, thus keeping the Company at the forefront of the use of the new communication channels.
- Compliance with that which is provided for in legislation, in the Code of Good Governance of Listed Companies and in the Corporate Governance System, and with the principles of cooperation and transparency with the authorities and competent regulatory and administration bodies.

The aforementioned principles apply to Company communications and information related to its engagement with shareholders and institutional investors in the context of their involvement with the Company, as well as with other stakeholders such as intermediary financial institutions, Company shares' managers and depositories, regulatory and supervisory bodies, rating agencies, information agencies, proxy advisors, etc.

2. GENERAL INFORMATION, COMMUNICATION AND PARTICIPATION CHANNELS.

With a view to complying with the aforementioned principles and the proper dissemination of Group information for shareholders and the market in general, Acciona makes the following information, communication, contact and engagement channels available to them:

2.1 Spanish National Securities Market Commission (CNMV) and other bodies.

The first general channel for information about the Company to shareholders, institutional investors and markets in general, is the Spanish National Securities Market Commission (CNMV) and, where appropriate, those channels put in place by other foreign supervisory authorities and bodies, with the dissemination and public character which information sent to these institutions immediately acquires through the Communication of Privileged Information or Relevant Information on its web pages, which is simultaneously posted on the Company corporate web page.

2.2 Press

With a view to facilitating open and transparent communication with the press, Acciona has a Communications Management Area through which it channels all requests made and questions asked by journalists about company business and development, along with the respective replies.

Acciona provides several phone lines (91 663 06 57/ 31 14/ 07 53) and a mailbox (gabinetedeprensa@acciona.es) for the press. All press releases and assorted material published by the company to facilitate press work can be found on the Acciona corporate web page <https://www.acciona.com/es/actualidad/>

2.3 Acciona corporate web page.

The Company web page is another major communication channel used to engage with shareholders, institutional investors and the markets in general (www.acciona.com). Kept permanently updated, the Company channels information over it that may be of interest to shareholders and institutional investors, thereby promoting the immediacy of its publication and enabling subsequent access to ensure that transparency be prioritised as the value that shapes Company relations with the markets and the public in general.

Not only is the information sent to the CNMV and other official bodies, the issuing of which is legally binding, published on the Company web page, but also any additional information deemed appropriate to achieve greater transparency and the widest possible dissemination to its shareholders, institutional investors and the market in general.

With a view to facilitating shareholder and investor queries, the information released by the Company over its web page is

simultaneously posted, whenever possible, in both Spanish and English.

Generally speaking, the Acciona corporate web page makes it easier to:

- Access legal, company, economic-financial documentation, and non-financial information about the Company from the "Shareholders and Investors" section.
- In the context of the General Meeting, request information, clarifications and ask questions related to its agenda, view the same live and even, when so provided for by the Board of Directors, attend it virtually.
- Learn about the principles, activities and reports, as well as other publications and data on non-financial information in general.
- Facilitate press work through the section "Updates" (<https://www.acciona.com/updates/>), specifically targeting this group, which includes, among other, corporate information, press releases, audiovisual material, etc.; the foregoing with the aim in mind of ensuring that the information passed on by the press to the market is true and as complete as possible.
- Consult the composition of and information on Company governance bodies, such as the Board of Directors and Board Committees, as well as the make-up of the Acciona executive team. Access presentations of results and other presentations for analysts and investors.

Webcasts and conference calls.

Periodic presentations of results and other relevant communications are streamed and broadcast by multi-conference, which enables shareholders, investors and analysts, and anyone who wishes, to access them. Both webcasts and multi-conferences are also available in their recorded versions and can be accessed through the corporate web page.

Moreover, at the start of every financial year, an approval schedule is published for interim annual accounts and financial statements, indicating the dates on which they will be presented to the market, all of which can be accessed through the web page. This schedule also contains the dates of non-financial information events and conferences.

People who link in to the multi-conference also have the possibility of asking questions to speakers or Group representatives.

The access link to these webcasts to present results is published beforehand on the CNMV web page indicating the date, time and how to access the presentation.

2.4 Social media.

Aware as it is of the impact of the new information technologies and communication channels over the internet, the Company encourages an active presence on social media (such as Twitter, Instagram, Facebook, LinkedIn, Slideshare and YouTube) where, without prejudice to its legal obligations, it endeavours to disseminate information of interest regarding how the Company is doing and Group activities, while at the same time smoothly and beneficially engaging with shareholders and other stakeholders in the habit of resorting to these media to keep up-to-date with matters of interest.

When providing privileged information over the social media, the Company will ensure that communications are governed by the following basic parameters:

- Integrity: the Company will make sure that the character limits on certain social media do not affect the integrity of the communication, informing concisely and in a readily understood manner.
- Clarity: the message published on social networks will be objective and accurate, avoiding the use of superlative terms that involve needless subjectivity. Moreover, the "Privileged Information" tag must be used, clearly separating it from any marketing communication.
- Global access: non-discriminatory access must be ensured, as must its free-of-charge dissemination, for a wide public in the European Union. In this regard, it should be emphasised that the social network used must be extensively present in the European Union.
- Interactivity: the very nature of the social media provides a degree of interactivity with users that is wanting in other media. Accordingly, the Company must make sure that the use of any other simulcast medium or channel, whether additional or complementary to the communication covered in point 2.1, to communicate privileged or other regulated information, cannot be used to extend or qualify the original information sent to the CNMV altering in this way its meaning or scope, as well as the replies of the informant or issuer on the information medium or channel.

Furthermore, the Company seeks to have General Shareholders' Meetings disseminated, either wholly or in part, over the social media, to which end it may publish the main headlines from the event in real

time, upload photos and/or videos of the live event onto Company channels and share the presentations on an internet web page.

Notwithstanding the foregoing, Acciona employees must be particularly careful with respect to public appearances, making sure to have the requisite authorisations to take part in events with a press or social media presence, to publish and share opinions, to participate in professional conferences or seminars, and in any other situation that may be publicly broadcast or disseminated, whenever they are participating as company employees. Acciona employees must likewise ensure proper coordination with their hierarchical superior and, where appropriate, with the Communication and Investor Relations Area to provide full and complete information. They must always make responsible, respectful and precise statements, following the guidelines established by the Communication and Investor Relations Area, while also respecting the confidentiality of Company information and that of its clients.

2.5 Distribution lists.

The Investor Relations Department distributes the interim financial results and both the privileged and relevant information it deems to be of the greatest interest for the market, immediately after its publication in the CNMV, to all those persons who so request it by email.

To ensure the issuing of news that may potentially contain privileged information for the market both transparently and efficiently and in accordance with Royal Legislative Decree 4/2015 of 23 October adopting the consolidated text of the Securities Market Act, Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse, CNMV guidelines with regard to the same and the Internal Code of Conduct in connection with the Securities Markets, the Company has established a privileged information and relevant information management and communication protocol setting out guidelines for the Group as regards the classification, management and publication of Privileged Information and Other Relevant Information.

In this regard, it is established as a general rule for the Group that the information contained in a privileged information or relevant information communication may not be made public through any other medium without first having been communicated to the CNMV.

Shareholders, institutional investors and markets can be informed, regardless of the foregoing, of information generated in the Company through any medium that abides by this General Communication Policy as long as there is no doubt that the information in question does not have to be communicated to the CNMV as privileged or relevant

information by law or under the privileged information and relevant information management and communication protocol, or when, having consulted the Company General Secretariat or the Internal Conduct Regulation Compliance Unit, the latter has determined that, in accordance with the rules laid down in the above paragraph, there is no obligation to send a particular communication to the CNMV.

3. SHAREHOLDER AND INVESTOR RELATIONS DEPARTMENT.

To facilitate open and transparent communication with shareholders, a permanent Shareholder Office has been opened through which all information requests, clarifications and queries and their corresponding replies are channelled.

To personally attend to shareholder queries, Acciona has established a phone line (+34 916231059) and mailbox (inversores@acciona.es), likewise available over the web page, www.acciona.com where contact persons for this department can also be found.

Conferences and meetings.

Acciona has a specific department for Shareholder and Investor Relations, which undertakes responsibility globally for coordinating, analysing and managing relations and contact with shareholders and investors. Accordingly this is the permanent and natural channel for communication and liaison between Acciona, its shareholders and investors and the market in general.

Through this Shareholder and Investor Relations Department, the Group will coordinate the communication of the different subsidiaries with the market to ensure that the information provided is appropriate, consistent and coherent at all times.

The Shareholder and Investor Relations Department will be able to count on, whenever necessary, the collaboration of those organisation employees that may be required or it is advisable be present to facilitate communication and attend to the information requirements that arise at any given time.

In the performance of its functions, the Shareholder and Investor Relations Department will obtain the information to be communicated to the market from the different areas throughout the Group responsible for its preparation, thus making it possible to ensure the consistency and uniformity of the same.

The principles and channels contained in this policy govern, where applicable, relations with other stakeholders, such as financial analysts, Bank shares' managers and depositories and proxy advisors, among others.

This policy will not apply to the dissemination of privileged or relevant information and relations with the press, which will be regulated by their own internal rules.

4. GENERAL SHAREHOLDERS' MEETING.

The Board of Directors encourages the informed and responsible participation of shareholders at the General Shareholders' Meeting and adopts, through its web page and other media, those measures and guarantees considered appropriate to facilitate the effective exercise by the General Shareholders' Meeting of its functions under the law and in accordance with the Company corporate governance system.

Acciona shareholders are called at least once a year to take part in the General Shareholders' Meeting at which the Company puts in place all types of media to facilitate their participation in the same (e.g. remote voting by email or over the corporate web page, or when established by the Board of Directors, by means of virtual attendance at the Meeting).

Likewise, when holding General Shareholders' Meetings, Acciona makes all the necessary information available to its shareholders to express their opinion on the matters raised for consideration by publishing this information sufficiently in advance and to the level of detail not only required by law but also by the best, national and international governance practices.

Acciona also enables the Shareholders Electronic Forum on its web page for General Shareholders' Meetings to which shareholders have access to facilitate communication prior to the holding of the meeting.

The General Shareholders' Meeting is broadcast live over the corporate web page when so established by the Board of Directors. It can be attended virtually from the link provided by the Company in the "Shareholders and Investors" section on its web page.

These measures seek to create an open environment that will facilitate the participation of shareholders in the General Shareholders' Meeting and the exercise of their rights that correspond to them as such.

In addition to the aforementioned channels, an information forwarding service is provided upon user's request to learn, in real time, about the latest news published on the corporate web page with respect to financial reports, privileged and relevant information communications and those made to the CNMV, or economic-financial and non-financial information presentations.
