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ACCIONA ENERGÍA'S SUSTAINABILITY- LINKED FINANCING FRAMEWORK

FINANCING THE SUSTAINABLE
DEVELOPMENT GOALS

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REFERENCE

This financing framework has been developed and is based on the [Sustainability-Linked Bond Principles 2020](#) of the International Capital Market Association (ICMA) and the [Sustainability Linked Loan Principles 2020](#), published by the Loan Market Association (LMA).

ICMA’s Sustainability-Linked Bonds aim to develop the key role that debt markets can play in funding and encouraging companies that contribute to sustainability (from an environmental and/or social and/or governance perspective). ICMA’s Sustainability-Linked Bond Principles provides guidelines that recommend structuring features, disclosure and reporting.

STRATEGY AND RATIONALE

EXPERTS IN DESIGNING A BETTER PLANET

With over 30 years of experience, ACCIONA Energía is an integrated renewable energy operator leading the corporate fight to mitigate the effects of the climate emergency and accelerate the transition towards a decarbonised energy model.

The company is the largest global energy operator exclusively dedicated to renewable energies¹ with no ties or legacy related to fossil technologies. The company has a unique profile integrated in all the phases of the value chain: project development, financing, engineering and construction, supply chain, O&M and management of renewable assets, and management and sale of energy.

ACCIONA Energía generates 100% clean energy with a pool of assets that sum up a capacity of over 11,2 GW (and additional 2GW under construction) mainly in the following technologies: onshore wind, solar photovoltaic (PV), hydropower, and biomass and concentrated solar.

The entity has installed renewable capacity in 16 countries across 5 continents, and in 2021 reached a total production of 24.5 TWh and 13.4 million tonnes of CO₂ eq. avoided as a result of its activity.

7 AFFORDABLE AND CLEAN ENERGY

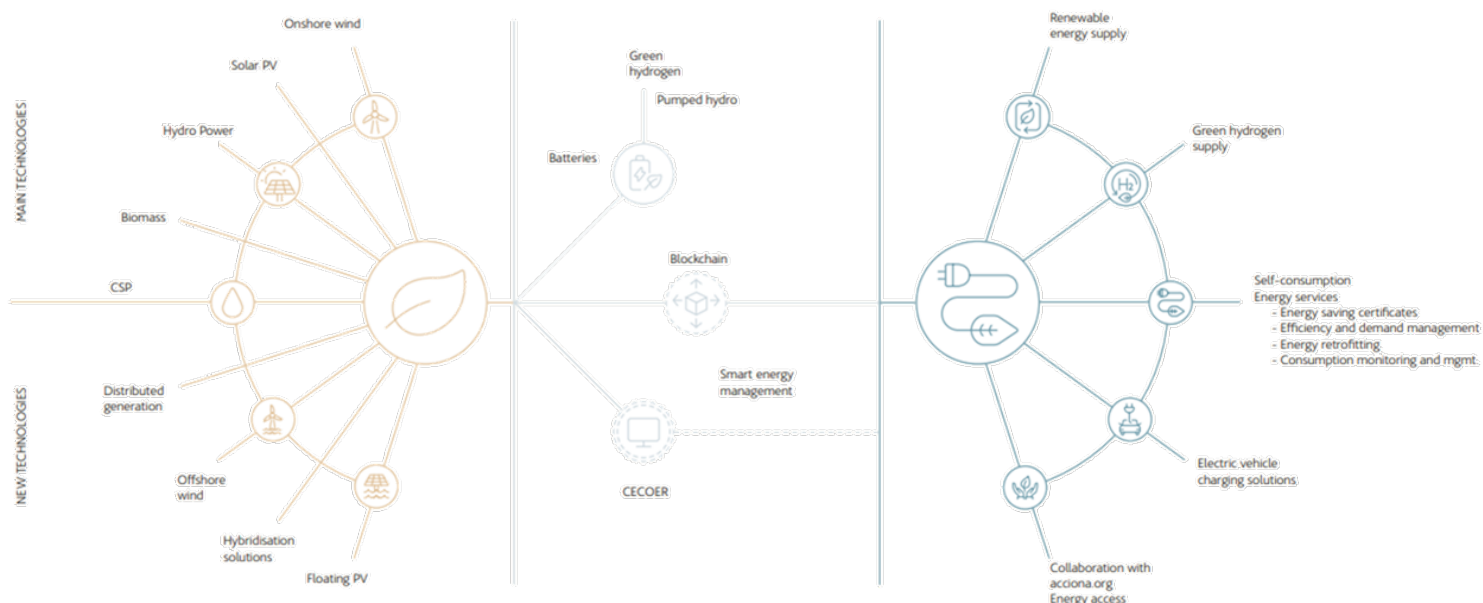


A different way of doing business that accelerates universal access to energy, meet Global Goal 7 "Affordable and Clean Energy", and the adoption of a decarbonized energy model. ACCIONA Energía supplies clean energy to a total of 7 million household equivalents.

¹ Excluding Chinese operators

TECHNOLOGIES AND SOLUTIONS

The 30 years' experience of ACCIONA Energía in the renewables sector goes hand in hand with the development of the main clean technologies on which the process of energy decarbonisation is based.



Main clean generation technologies on which ACCIONA Energía has activity:



WIND POWER

With more than 25 years' experience in the sector, ACCIONA Energía is a world leader in the wind technology. The company has nearly 8,700 MW of wind power capacity that generates approximately 80% of its renewable production.



SOLAR PHOTOVOLTAIC

In 2001 the company built the biggest photovoltaic plant in Spain at the time, with a rated capacity of 1.2 MWp. Since then has installed large plants in Atacama, Sonora, Kalahari or Sahara deserts or the snow-covered plains of Ukraine, with more than 1,400 MWp of total capacity.



HYDROPOWER

ACCIONA Energía has been involved in hydropower from its early days in the energy sector. The company owns and operates 75 hydroelectric plants in Spain with an overall capacity of 868 MW. Some have been operating for more than a century thanks to excellent O&M programmes.



THERMAL RENEWABLES

The company multi-technology vocation led ACCIONA Energía to be pioneer in biomass plants (Sangüesa was the first plant of its type in southern Europe) and in parabolic cylinder solar thermal plants: in 2007 the company connected the first plant of the revival of a new era in the Nevada desert (USA).

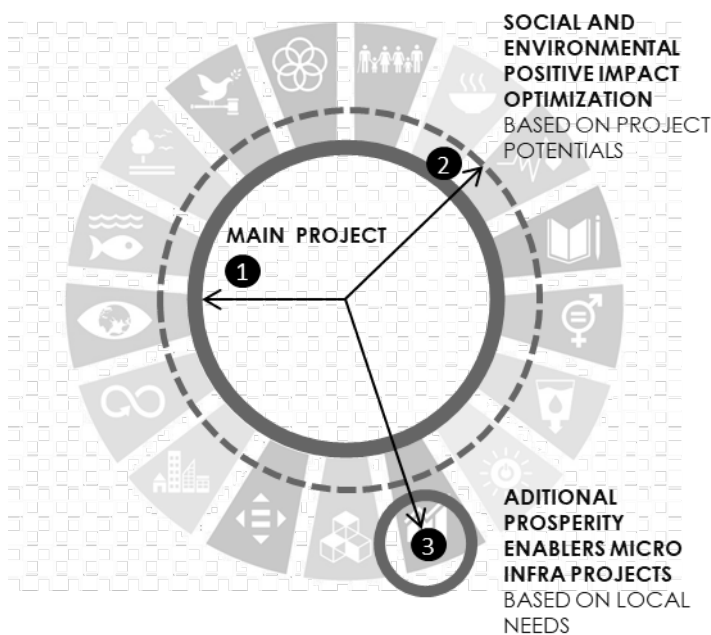
REGENERATIVE SOLUTIONS

Leading the opportunities of the 2030 Agenda requires an approach in line with the nature of the challenge posed by the sustainability transformation. We need new actors to implement new approaches that transcend traditional sectors and unique projects capable of providing integrated solutions that combine capital, talent, technique and technology, in a different way.

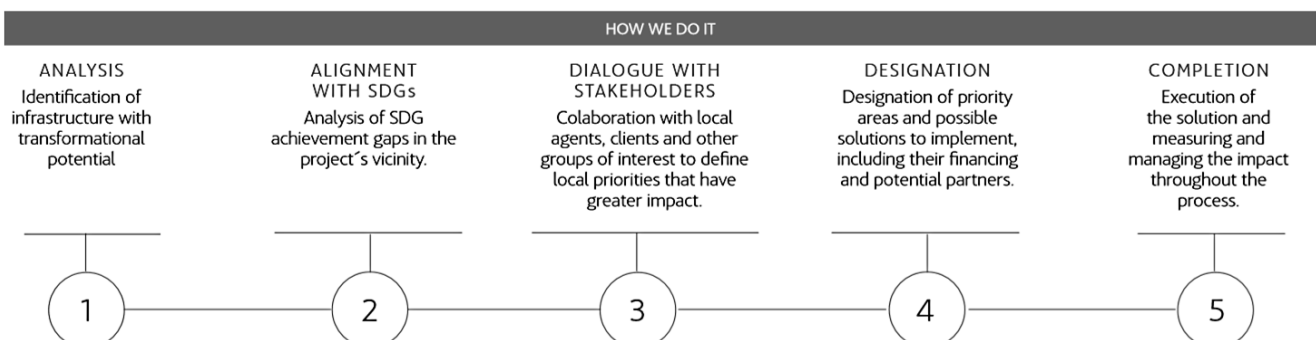
ACCIONA Energía uses the term “regenerative” to refer to its approach to designing, building and operating infrastructures, so as to increase their positive social impact by multiplying its capacity to promote development — especially of the most vulnerable groups — while their environmental footprint tends to zero.

ACCIONA Energía analyzes the scope for multiplying the positive impact of its projects on the community, starting from the conception or design phase. It then proposes alternatives and additional projects supported by rigorous socioeconomic studies, which seek to activate more levers of local development through the ACCIONA Energía project, making it more valuable and impactful.

With these actions, ACCIONA Energía increasingly contributes to the main enablers of progress, such as local employment and economic activity in the area, training, or access to basic services such as water and electricity. Also to other social needs such as the right to a healthy and sustainable environment.



- 1 Energy Project itself
- 2 Sustainability optimization: benefits using the Project operations to increase impact on vulnerable people, employment, gender empowerment, full recyclability of waste, renewable energy use, etc.
- 3 Additional prosperity enablers: using the Project as a platform to develop other micro infra projects, based on SDGs needs such as connectivity, water, sanitation or energy for vulnerable people, entrepreneurship areas for social innovation, electric charging for zero carbon mobility, etc.



SUSTAINABILITY LINKED FINANCING FRAMEWORK

RATIONALE FOR ISSUING SUSTAINABILITY-LINKED BONDS

This Sustainability-linked Financing Framework is aligned with the Sustainability-Linked Bond Principles (SLBP) and the Sustainability-Linked Loan Principles (SLLP). The SLBP were published by the International Capital Markets Association (ICMA) in June 2020 and the SLLP by the Loan Market Association (LMA) in May 2020 to increase capital allocation to sustainability, through the achievement of material, quantitative, pre-determined, ambitious, regularly monitored and externally verified ESG objectives, measured by Key Performance Indicators “KPIs” and Sustainability Performance Targets (“SPT”). The following five components are the basis of ACCIONA Energía’s Sustainability-linked Financing Framework:

1. selection of key performance indicators (KPIs);
2. calibration of sustainability performance targets (SPTs);
3. specific financial instrument characteristics;
4. reporting on the above, and
5. independent verification of the components listed in points 1-4.

WHAT MAKES THIS FRAMEWORK DIFFERENT

ACCIONA Energía intends to use its Sustainability-linked Financing Frameworks as a tool to channel investment towards the low carbon economy and the global sustainability agenda, by linking the funding structure to corporate and local sustainable performance improvements based on the Sustainable Development Goals. This will be possible through the bilateral commitment of ACCIONA Energía and the financial markets, whose contribution through a margin adjustment will translate into a broader direct impact on the communities.

Accordingly, the capital allocated will contribute to sustainability, through the achievement of pre-determined, ambitious and material quantitative ESG objectives, which are monitored regularly and verified externally.

- **Corporate Performance targets:** *Based on Materiality.* Contribution to the Global Goals, as Paris Agreement on Climate, reducing the global footprint from own operations, aligned with the corporate strategy and representing a material improvement in the respective KPI trajectory.
- **Additional Local Impact targets:** *Based on Additionality.* Will capture the tangible social needs, contributing to the 2030 Agenda, additionally to ACCIONA Energía’s projects main contribution and maximizing the impact beyond its business.

The commitments established in this framework and their real tangible impact will be guaranteed in any case by ACCIONA Energía. In this sense, if the company fails to deliver the commitment impact as established in this framework, it will rely on third parties that, through penalty mechanisms, will provide the full targeted impact equivalent to the shortfall.

KEY PERFORMANCE INDICATORS

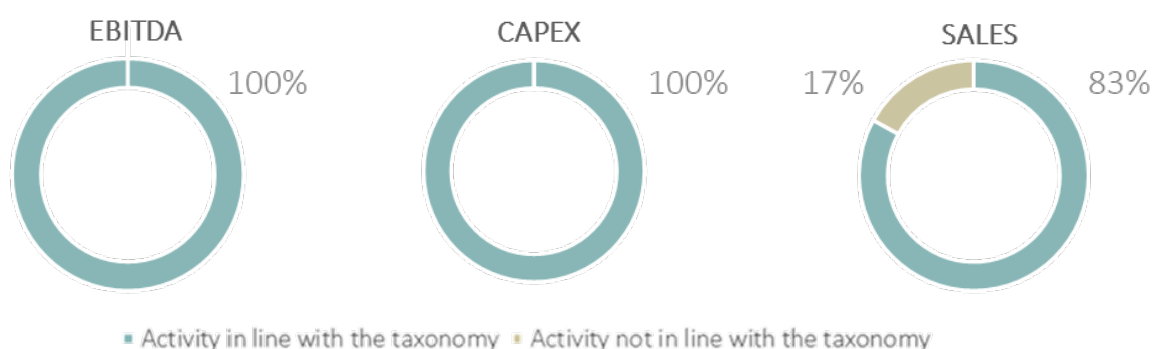
CORPORATE PERFORMANCE

- **KPI 1 % CAPEX aligned with EU Taxonomy Regulation**

The EU Taxonomy, classifies economic activities into categories that are encompassed in macro sectors, and includes, for the time being, specific technical aspects for 2 of the 6 environmental objectives it pursues: mitigation and adaptation to climate change. In addition, all classifiable activity under the taxonomy must also comply with a minimum set of social safeguards and must not contradict any of the other four goals it pursues (water protection, transition to a circular economy, pollution control and healthy ecosystems).

The ACCIONA business model, focused on sustainability and with a balanced and resilient portfolio of projects, make the company a benchmark in the sector. ACCIONA uses sustainable financing mechanisms directed at projects and sustainable corporate financing. The strategic alignment with an investment in sustainable assets can be seen in the analysis that the company has been carrying out since 2019, when ACCIONA began to analyse its activities according to the criteria established by the European Union’s taxonomy of sustainable finances. ACCIONA was the first company to publish the degree of alignment with the demanding parameters established by this taxonomy.

In 2020, ACCIONA Energía carried out a classification of its activities using the criteria in the most recent version of the European taxonomy (draft Delegated Act at the end of 2020), so that 100% of CAPEX, 100% of EBITDA and 83% of the company’s sales meet the requirements established in relation to the mitigation of climate change.



Historical performance	2019	2020
% of taxonomy-compliant CAPEX	100%	100%

Reporting in accordance to the taxonomy will be mandatory for large listed corporates in 2022, and will help direct investment flows to those sectors fundamental to achieving the sustainability goals behind the European Green Deal.

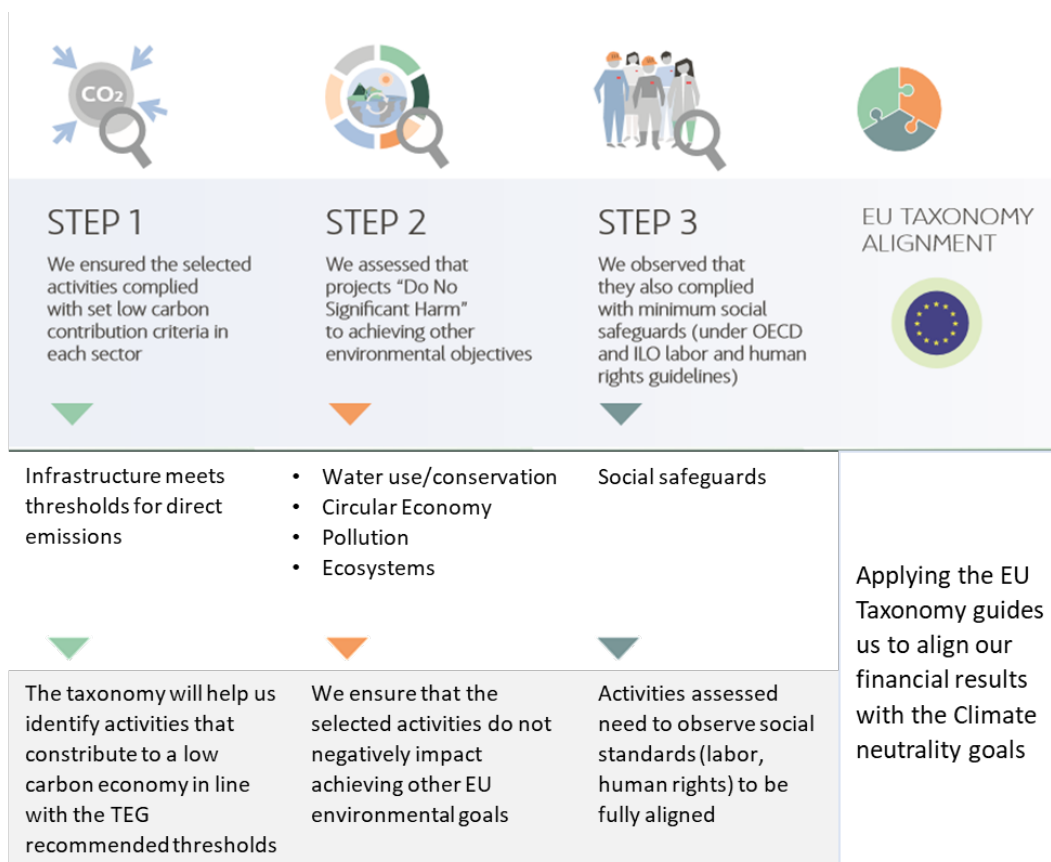
CALCULATION METHODOLOGY

The calculation methodology will be based on the exposure of ACCIONA Energía to the technical selection criteria and minimum safeguards established by Regulation (EU) 2020/852 and associated delegated acts.

To meet the definition of an ‘environmentally sustainable economic activity’ (Article 2 of the Regulation) and thus be considered Taxonomy-eligible, ACCIONA Energía’s activities will:

1. **Meet the technical criteria** to one or more of the environmental objectives and to the technical screening criteria.
2. **Do no significant harm** to any other environmental objective (Do No Significant Harm (“DNSH”) criteria).
3. **Comply with minimum social safeguards** (these are defined as ILO core labour conventions, the OECD Guidelines on Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.).

Therefore, ACCIONA Energía’s economic activities, even when making a substantial contribution to climate change mitigation and/or adaptation, may not be Taxonomy-eligible if they cause significant harm to the remaining environmental objectives or they do not comply with the social safeguards considered to be a prerequisite.



ADDITIONAL LOCAL IMPACT



KPI 2 Net POSITIVE by Nature-Based Solutions

Since 2015 an estimated **10 million hectares of forests** have been lost every year. Nature-based Solutions are inspired and supported by nature, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring natural features through locally adapted, resource-efficient and systemic interventions

ACCIONA Energía is committed to the Paris Agreement and to limit the global temperature rise to 1.5°C above pre-industrial levels. This includes a commitment to reduce 60% of our GHG emissions (scope 1 and 2) by 2030 by drastically reducing GHG emissions and incorporate Nature-Based Solutions (NBS) that are equal or equivalent to planting trees.

ACCIONA Energía currently complies with this emissions reduction path being substantially ahead of this commitment. The sum of Scope 1 and Scope 2 CO₂e emissions generated in 2020 was 25,633 tonnes, of which 9,116 tCO₂e were Scope 1, and 16,517 tCO₂e were Scope 2 market-based.

	2017	2018*	2019*	2020*	2021	2022
% of Reduction vs 2017	0%	4.62%	9.23%	13.85%	18.46%	23.08%
Absolute Emissions (Scope 1 & 2 market based)	48,508	46,269	44,030	41,792	39,553	37,314

** 2018, 2019 and 2020 data correspond to the maximum emissions that should have been emitted in those years.*

2023	2024	2025	2026	2027	2028	2029	2030
27.69%	32.31%	36.93%	41.54%	46.15%	50.77%	55.38%	60.00%
35,075	32,836	30,597	28,359	26,120	23,881	21,642	19,403

With this effort, the company will go beyond achieving net positive carbon emissions to actually create an environmental benefit by removing additional carbon dioxide from the atmosphere.

This activity facilitates the achievement of the 2030 Agenda's Sustainable Development Goal 15 "Life on Land" to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss. Especially to its target: "15.2 promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally".

4 QUALITY
EDUCATION



KPI 3 Number of hours of certified technical and vocational education and training (TVET) for women, vulnerable and underrepresented minorities.

Education enables upward socioeconomic mobility and is a key to escaping poverty, yet according to the UN some 750 million adults – two thirds of them women – remained illiterate in the world.

ACCIONA Energía understands that it must be a major player in the economic development of the communities in the countries in which it operates, as well as a driving force for improving the quality of life of people in the countries in which it operates. ACCIONA Energía commits to provide Technical and vocational certified training to people from communities around the projects where ACCIONA Energía operates (with a special focus on vulnerable groups, such as women, young people with no professional training, and people at risk of social exclusion) and help them gain qualifications via its corporate university.

Though the commitment to generate positive impacts in the communities where it operates and the need to foster highly qualified professionals, in 2022, ACCIONA Energía has continued to design and implement High Impact Solutions. These solutions, allow the company to enhance its sustainable difference in each project, though the inclusion of adjacent projects, improving the living conditions of the population and/or the environment in the vicinity of the company's operations.

Number of hours of technical certified training provided focused on professionals/workers involved in ACCIONA Energía's projects as well as actions that promote employability in new professions – skilled and unskilled as transversal solution to the entire projects. ACCIONA Energía will monitor ongoing activities and efforts, such as the number of hours of training delivered through each program and will highlight performance results attained at the end of a period of activity, such as satisfaction measurement and annual exam pass rates.

The activities aimed at upgrading the sustainable difference in each project favour the achievement of the 2030 Agenda's Sustainable Development Goal 4, “ensure inclusive and equitable quality education and promote lifelong learning opportunities for all”, especially to its targets: 4.4 “By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship”.

SUSTAINABILITY PERFORMANCE TARGETS

CORPORATE PERFORMANCE

- **SPT 1 Average >95% of CAPEX aligned with the EU Taxonomy Regulation**

ACCIONA Energía commits to keep an average above 95% of its CAPEX aligned with the EU Taxonomy in the period 2021 - 2025, calculated with respect to ACCIONA Energía’s exposure to the activities described within the taxonomy. ACCIONA Energía will establish intermediary milestones to reach this target yearly, in any case, the real cumulative progress will be measured after the period.

Intermediary milestones and SPT	2021	2022	2023	2024	2025	TOTAL
% of taxonomy-compliant CAPEX	>95%	>95%	>95%	>95%	>95%	>95%

In the event of any updates on the current Report of the Technical Expert Group on Sustainable Finance, and in order to maintain a consistent calculation methodology over time, ACCIONA Energía will consider the baseline calculation methodology as a guideline to allow comparability.

Factors that support the achievement of the Targets:

- ACCIONA Energía is the world’s largest energy operator working exclusively with renewable energy.
- Commitment to impulse EU Taxonomy aligned investments in its operations, through the 2025 Sustainability Master Plan.
- Sustainable by design. Mitigation and adaptation criteria are incorporated from the design at the initiative of ACCIONA Energía value chain.
- Important activity in the field of innovation that has led to changes in our processes that have allowed us to reduce emissions every year.
- Enhanced due diligence and implementation of a human rights respect, protection and remediation programme for all activities and markets.

Factors that risk the achievement of the Targets:

- Taxonomy requirements includes do not significant harm provisions and social safeguards that must be compliant.

ADDITIONAL LOCAL IMPACT

▪ **SPT 2 Net POSITIVE by Nature-Based Solutions**

ACCIONA Energía commits to achieve net positive GHG emissions by Nature-Based Solutions (NBS), capable of neutralising the carbon footprint (scope 1 & 2 market-based emissions) of the company in the period 2022-2025.

This commitment is carried out by planting trees or the equivalent certified nature-based solutions² for an amount of CO₂ equal to or greater than the company's scope 1 and 2 emissions.

The table shows the number of trees to be planted in the period, considering a emissions reduction path aligned with the 1.5°C scenario approved by the Science Targets Initiative (SBTi).

ACCIONA Energía will establish intermediary milestones to reach this target yearly, in any case, the real cumulative progress will be measured after the period.

Intermediary milestones	2022	2023	2024	2025	TOTAL
Trees planted	117,500	117,500	117,500	117,500	470,000

Factors that support the achievement of the Targets:

- Nature Based Solutions can outweigh the cost of other engineered or technological alternatives being an effective and a cost effective model.
- If needed, an active cooperation and coordinated action between stakeholders with align priorities, interest, or values will ensure a successful implementation program.
- Use of standardized principals and frameworks to scale NBS sustainably.

Factors that risk the achievement of the Targets:

- High level of long-term commitment is required as NBS outcomes take years to yield their benefits.
- Identifying appropriate indicators and metrics for the ecological effectiveness of nature-based interventions.
- International, national and local climate and nature based solutions policies and practices are evolving over time.
- An inadequate implementation of NBS can compromise biodiversity, livelihood, water, and climate at scales from which it would be difficult to pull back.

² Data has been calculated based on [MITECO \(Spanish Ministry for Ecological Transition\)](#), and the [Guide for estimating carbon dioxide absorption](#), with an average CO₂ absorption rate of 0.29 tons CO₂ per tree planted in 30 years with respect to all native species of Iberian flora.

- **SPT 3 Support 11,811 hours of certified technical training (TVET) for women and underrepresented groups.**

ACCIONA Energía makes an active contribution to improving the social-economic scenario of the communities in which it operates. Its initiatives contribute to people's well-being, broaden their access to education, promote the conservation of their heritage, care for the environment and biodiversity, and promote sport and healthy lifestyle. Its projects also focus on job creation by training workers and creating local business as well as improving community infrastructure.

ACCIONA Energía will establish intermediary milestones to reach this target yearly, in any case, the real cumulative progress will be measured after the period.

Intermediary milestones and SPT	2023	2024	2025	TOTAL
Hours of certified technical training (TVET) for women and underrepresented groups	3,937	3,937	3,937	11,811

Factors that support the achievement of the initiative:

- Support from the corporate university in partnership with the regulated training centers run by the local authorities.
- Support of regulators and institution to achieve SDG 4, especially providing access to inclusive, equitable quality education to those in vulnerable situations or other status.

Risk factors for the achievement of the initiative:

- Ability to estimate the pricing benefit from the issuance of an ESG-labelled instrument.
- Pandemic outbreaks: on-site training programs may face disruption in the case of unexpected viral outbreaks.

FINANCIAL CHARACTERISTICS

CORPORATE PERFORMANCE: SPT 1

The SPT 1 will not have implications on the applicable loan/credit margin (the “Margin”). However, if ACCIONA Energía has not met SPT 1 by the Reference Date, as specified in the relevant documentation of the specific transaction, the company will make a contribution to the United Nations Environment Programme (UNEP) to remove 500 tCO₂e per each M€ of CAPEX shortfall relative to SPT 1, using Nature-Based Solutions.

LOCAL IMPACT TARGETS: SPT 2 & SPT3

Based on the achievement of SPT 2 & SPT 3 annual targets, the Margin may vary in the following manner:

Annually:

- If the annual targets are met, the resulting applicable Margin would be reduced by 5 bps (the "Sustainability Discount"). In case the current Margin reflects the benefit from the Sustainability Discount, no additional Margin reduction will be applied; or
- If the annual targets are not met, the applicable Margin will revert to the initial Margin (i.e. an increase in 5 bps), in the case the current Margin reflects the benefit from the Sustainability Discount. If the current Margin is the same as the initial Margin, no further increase will be applied.

At maturity (or prepayment/cancellation):

- If on the Reference Date, the real cumulative progress with respect to SPT 2 & SPT 3 lie below the path implied by the committed annual targets, the company will make a contribution to the United Nations Environment Programme (UNEP) equivalent to the shortfall for it to deliver the full targeted impact.

Finally, in case of full prepayment/cancellation of the facility, the post-prepayment annual targets of SPT 2, SPT 3 & SPT 4 will be incorporated in the refinancing instrument , as will be specified in the subsequent sustainability-linked financing framework. The SPT 1 will also be incorporated in a refinancing instrument to ensure meeting the 2030 target.

The details of any other step-up margin or premium payment amount to investors in any Sustainability-Linked Bond in the event of a missed target will be set out in the offering documentation provided at the point of issuance of any Sustainability Linked Bond.

These details will include:

- Maturity date of instrument,
- Sustainability Key Performance Indicator (KPI) ,
- Sustainability Performance Target (SPT),
- Sustainability Target Observation Date(s),
- Financial Incentive Mechanism and Quantum (for example a coupon step-up, or payment of a premium at maturity).

ANNUAL REPORTING

ACCIONA Energía intends to provide aggregated reporting for all of its sustainable financing instruments and any other outstanding sustainable financing. This reporting will be published pre- and post-issuance and the transparency measures will be specified as follows:

Pre-issuance

- Definition of KPI(s) and SPT(s) (including calculation methodologies);
- Detailed description of the potential variation of the SLB financial and/or structural characteristics of the bond;
- Explanation of the planned back-up mechanisms for the event that the SPTs cannot be calculated or observed, or is unsatisfactory;
- Exceptional events (such as significant change in consolidation scope as a result of material M&A activities or drastic changes in regulatory environment or extreme events) that might substantially impact the calculation of the KPI, restatement of the SPT and/or pro-forma adjustments of baselines or KPI scope

After one year has elapsed from the issuance of the applicable sustainable financing instruments, ACCIONA Energía will draw up and keep readily available information on the corporate website.

Post-issuance

- Up-to-date information on the performance of the selected KPI(s), including baselines;
- Any information enabling investors to monitor the level of ambition of the SPTs (e.g., any update in the issuer's sustainability strategy or on the related KPI/ESG governance and, more generally, any information relevant to the analysis of the KPIs and SPTs).
- Illustration of the positive sustainability impacts of the performance improvement
- Verification / Assurance report: Reports on verified SPTs will be made publicly available, outlining the performance vs. SPTs and the related impact, and timing of such impact, on the bond's financial and/or structural characteristics
- In the event of non-compliance with the SPT, in the terms defined in this framework, information will be reported on the projects carried out by UNEP - UN Environment Program to generate the impact committed by ACCIONA Energía.

The Sustainability-Linked Financing Framework and the transparency report will be published on ACCIONA Energía's website and will remain available until the maturity of such sustainable financing instruments, unless replaced by further reports in the event of material changes of allocation.

They will also be available in a specific appendix of the Integrated Report focused on accountability for sustainable finance transactions.

EXTERNAL REVIEW

Second-Party Opinion (pre-issuance)

ACCIONA Energía's Sustainability-Linked Financing Framework has been reviewed by DNV GL, which issued a Second-Party Opinion confirming the alignment of the Framework with the Sustainability-Linked Bond Principles and the Sustainability-Linked Loan Principles. The Second-Party Opinion and the Sustainability-Linked Financing Framework will be made available to investors in sustainability-linked 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 Energía intends to request verification by its external auditor of a management statement on the performance level against each SPT for each KPI. It will also be externally verified each year by an audit firm using accountancy procedures for assurance engagements other than audits or reviews of historical financial information (ISAE 3000).

In case of local communities targets related to access, this verification can be performed by certification of non-governmental organizations or local regulators authorities.

The report and the assurance/certification statement will be part of ACCIONA Energía's Sustainable Finance Report, available yearly in the corporate website: https://www.acciona-energia.com/shareholders-investors/stock-market-information/sustainable-finance/?_adin=02021864894