

STATEMENT OF NON-FINANCIAL INFORMATION 2022

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N.º 3912



BUSINESS AS UNUSUAL

The attached Non-Financial Information Statement has been prepared in compliance with Spanish Law 11/2018 of 28 December, transposing Directive 2014/95/EU of the European Parliament, and is an inseparable part of the ACCIONA Consolidated Directors' Report for 2022.

The report will be made available to everyone in 2023. Until its publication, you may ask for information by writing to responsabilidadcorporativa@acciona.es.

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Other public reports by ACCIONA

- **Integrated Report**
Relationship between the corporate strategy and the performance in different activities and contexts in which the company operates.
- **Half-yearly sustainability report**
Evolution of the principal indicators in the first half of the year.
- **Sustainable financing report**
ESG funds and impacts linked to sustainable financing achieved at project and corporate level.
- **Climate change report**
Climate change risks and opportunities according to the Task Force standard on Climate-related Financial Disclosures (TCFD).

ACCIONA Energía, a listed company, also discloses its own Sustainability Report and other reports independently.

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We challenge the present to make the future possible

Business as unusual

ACCIONA develops sustainable infrastructures designed to boost the Earth's regeneration and meet society's needs.

ACCIONA aims to build the power of transforming infrastructures by going beyond the usual zero impact goal with a view to recovering what we have already lost. Our mission to make a positive impact forces us to challenge today's usual ways and find new ways of doing things.

With this non-conformist spirit, we strive to lead a new sector that contributes sustainable solutions to the challenges faced by a development model that is depleting resources. We work to build a better future.

ACCIONA's activities to help achieve the UN Sustainable Development Goals:

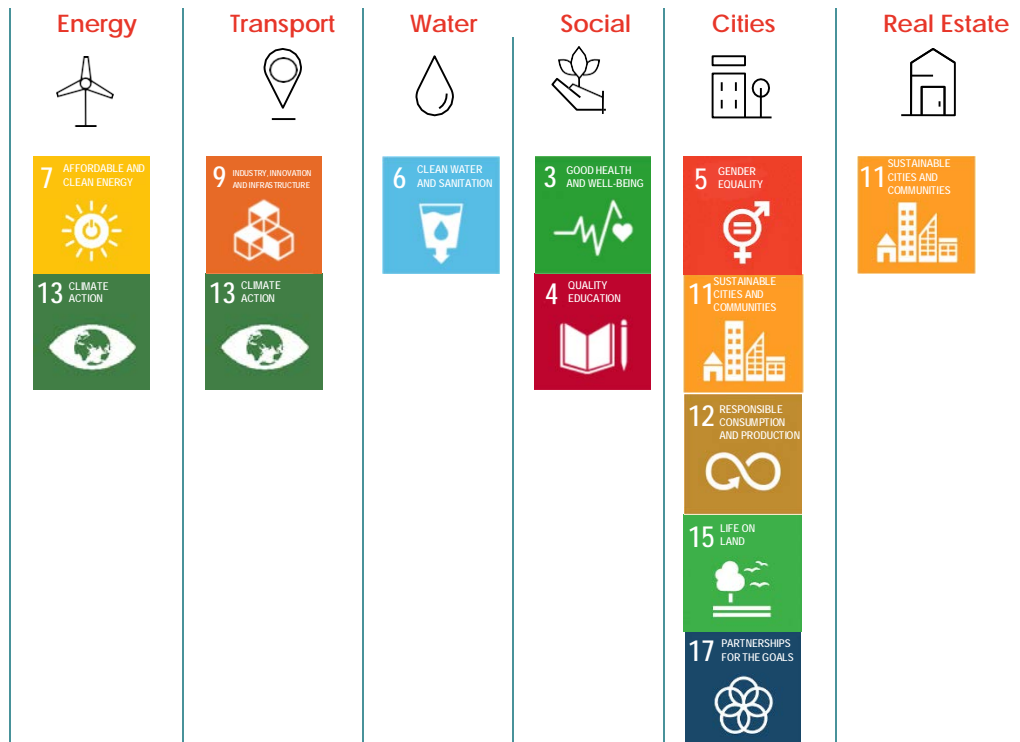
ACCIONA develops infrastructure solutions that foster a systematic and regenerative change in people's lives and communities. Our opportunities are strategically based on the 17 Goals of the United Nations 2030 Agenda, especially focusing on developing solutions aimed at decarbonising the economy:

- **Energy:** the company owns and operates renewable energy assets, including onshore wind, solar, biomass, hydroelectric and solar thermal energies.
- **Transport:** ACCIONA builds and operates infrastructures to transport people and goods (roads, bridges, railways and tunnels).
- **Water:** we design, build and operate drinking water treatment plants, waste water purification plants, tertiary treatments for water reuse and reverse osmosis desalination plants.
- **Cities:** ACCIONA responds to different challenges faced by cities, including waste management, electric and shared mobility, revitalising urban spaces and expanding green areas.
- **Social:** we develop solutions for healthcare and education infrastructures and cultural engineering, as well as preserving and cleaning the environment.
- **Real estate:** ACCIONA's real-estate activity focuses on developing and managing real-estate developments designed to increase the quality of life with minimum impact on the landscape and the consumption of resources and energy.

ACCIONA's solutions contribute to these key SDGs:

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The convergence of the company's business with social needs and planetary health has two key strategic effects on ACCIONA:

- **Higher standards.** It steps up the responsible behaviour standards in the company's processes, regardless of the activity or the territory it is operating in.
- **Designs with a greater impact.** Drives the activities and designs for projects to maximise their positive impact.

ACCIONA's Sustainability Master Plan guides the company's strategy and develops the main tools required to tackle the main transformation challenge: placing people at the centre, generating a positive effect on the Earth, integrating regenerative solutions into our portfolio to truly transform the environments we operate in and leading the change by setting an example.

ACCIONA in 100 words

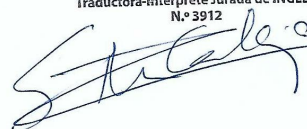
ACCIONA is one of the leading Spanish companies in the IBEX 35, present in more than 40 countries worldwide. Through its activity, the company provides for basic infrastructure, water and energy needs through innovative solutions that generate progress and a positive impact, a new way of doing business aimed at designing a better planet for everyone.

The company carries out its operations with over forty thousand professionals and had a turnover of 11,195 million euros and a gross operating result (EBITDA) of 2,068 million euros in 2022.

A NEW SHARED PURPOSE

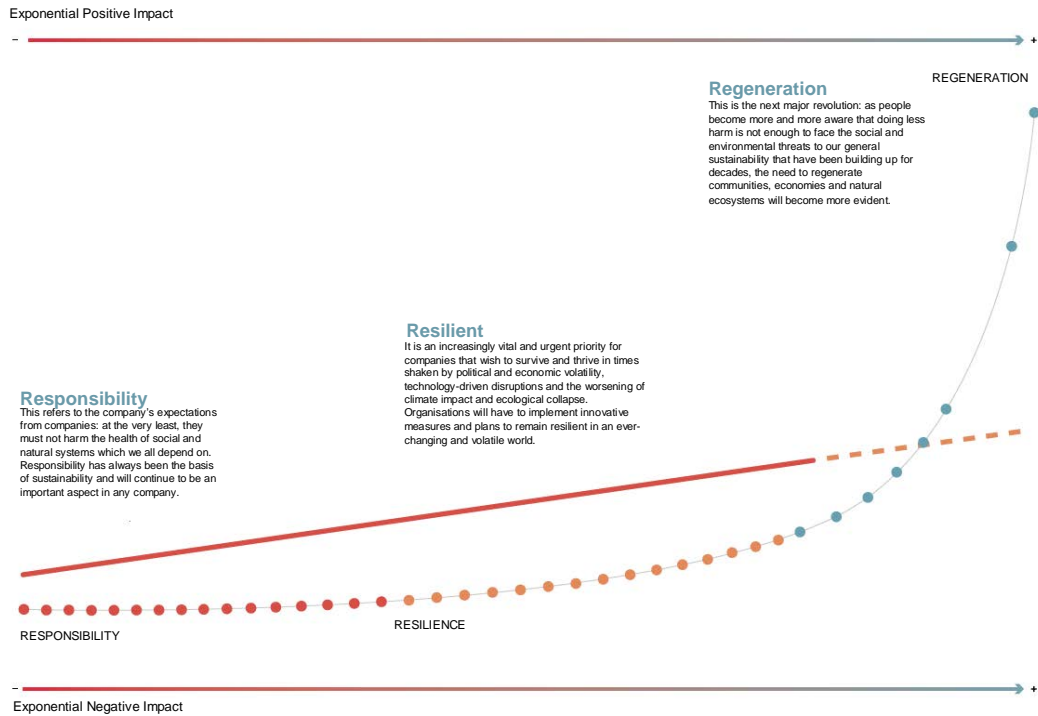
In 2022 we defined ACCIONA's new purpose to materialise something we have already been proving for the past 25 years: to change the course of history, we need to do things differently.

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From responsibility to regeneration

THE THREE Rs



ACCIONA challenges the present to make the future possible for everyone. That is our mission, our raison d'être.

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2022 RESULTS

ACCIONA Energía

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies. It has significant presence in 20 countries on five continents. It produces clean and emission-free energy for the equivalent of 7.5 million homes. It has a unique company profile, integrated in all the phases of the value chain: development, financing, engineering and construction, supply chain, operation, maintenance and retail of energy.

	2021	2022
Turnover (€ Mill.)	2,472	4,351
EBITDA (€ Mill.)	1,086	1,653
Installed capacity (MW)	11,245	11,822
Total production (GWh)	24,541	23,910

Infrastructures

Construction

This line of business is at the forefront in R&D&i and ACCIONA is one of the world's leading companies in the sector, using the most advanced techniques for the execution of its works. It covers all aspects of construction through business units specialised in bridges, roads, railways, tunnels, ports, hydraulic works, as well as engineering and industrial areas.

	2021	2022
Turnover (€ Mill.)	3,626	4,560
EBITDA (€ Mill.)	163	227
No. of employees	12,086	15,292

Concessions

ACCIONA Concesiones is one of the leading private infrastructure developers worldwide, both in terms of the number of projects and its turnover. It is based on a team with an approach fully adapted to local needs and peculiarities.

	2021	2022
Turnover (€ Mill.)	53	52
EBITDA (€ Mill.)	46	37
Concessions	13	14

Water

Access to water is a basic resource on which ACCIONA focuses to cover the main needs of society. ACCIONA's end-to-end management solutions for the whole water cycle are leaders in different parts of the world. Its activity focuses on serving citizens, ranging from water harvesting, desalination and drinking water purification, to water supply, treatment and return to the environment. It also manages integral services covering all the stages involved in water treatment.

	2021	2022
Turnover (€ Mill.)	1,052	1,272
EBITDA (€ Mill.)	100	89
Treated water (hm ³)	1,033	1,149

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Other infrastructure activities

ACCIONA intends to speed up the implementation of a circular economy model through its solutions in waste management and the regeneration of the natural environment with its management of ecosystems and green spaces. The company is also committed to health with its health transport management.

	2021	2022
Turnover (€ Mill.)	165	148
EBITDA (€ Mill.)	14	15

Other businesses

It includes the business of Bestinver, a financial services firm that offers fund management and stock brokerage; ACCIONA Inmobiliaria, one of the leading housing development companies; ACCIONA Cultura, a global leader in the creation of cultural and brand experiences; ACCIONA Mobility, a company with the largest shared electric motorcycles fleet in the world; and another series of services.

	2021	2022
Turnover (€ Mill.)	1,055	1,182
• Bestinver	128	101
• Real Estate	190	247
• Corporate and other	738	834
EBITDA (€ Mill.)	104	73

In 2021, other businesses include several activities that were previously consolidated in the infrastructures division.

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ACCIONA IN THE WORLD

Present in over 40 countries worldwide.



INDICATORS	North America	Central and South America	Spain	Rest of Europe	Asia and Oceania	Africa
REVENUES million euros	914	1,281	4,924	1,346	2,638	91
ENERGY PRODUCED Total GWh	6,407	2,363	11,720	1,005	1,496	919
WATER TREATED FOR CUSTOMERS hm ³	82	16	361	129	294	263
R&D&i EXPENDITURE million euros	4.77	16	147	30	63	-
GHG*** EMISSIONS PREVENTED thousands of tonnes of CO ₂	3,518	2,013	5,118	541	1,341	688
GHG EMISSIONS Scope 1 & 2 thousands of tonnes of CO ₂	39	29	36	8	54	0.3
EQUIVALENT WORKFORCE Employees	852	11,326	21,914	4,239	7,467	94

* Rounded off

**Greenhouse gases

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Governance of sustainability and materiality

Sustainability governance and management

ACCIONA relies on a governance model designed to integrate risk management, opportunities and material impacts in the decision-making process.

SUSTAINABILITY GOVERNANCE

ACCIONA's Board of Directors formed a Sustainability Committee back in 2009 and was the body in charge of leading sustainability-related actions.

In 2021, this Committee merged with the Audit Committee to create the Audit and Sustainability Committee that helps the Board members supervise accounting, financial and non-financial information, the best practices in sustainability, internal and external audit services and risk management. The Committee meets, depending on its needs, at least four times a year.

Functions of the Audit and Sustainability Committee in terms of ESG¹

- Regularly review the effectiveness of the internal control and non-financial risk management systems.
- Supervise and evaluate the preparation process, integrity and market presentation of the mandatory non-financial information, both annual and interim, revising compliance with regulatory requirements, the appropriate delimitation of the consolidation perimeter and the proper application of accounting criteria, as well as raise its reports to the Board of Directors.
- Identify and guide the sustainability policies, rules, commitments, objectives, strategy and best practices. Ensure that Company procedures in environmental and social matters are in line with the strategy and policies set.
- Identify and guide the policies and rules on corporate governance before they are submitted to the Board of Directors. Supervise compliance with the policies and standards and the internal rules of conduct applicable to the company and its group, ensuring at the same time that the corporate culture is in line with its purpose and values.

The main Environment, Social and Governance (ESG) matters discussed at the 2022 meetings were:

- Approval of the Cybersecurity Policy for ACCIONA, S.A. and creation of a Cybersecurity Committee for the Group.
- Changes and amendments to the Corporate Policies and approval of the Human Rights Policy, the Circular Economy Policy and the Diversity-Inclusion Policy.
- Follow-up of sustainability performance.
- Follow-up of work plans for the ESG 2022 report.

The Non-financial Information Statement is checked and put to the vote at the Annual General Meeting (AGM) as required in Spanish Law 11/2018. Shareholders have the opportunity to express their opinion on the initiatives and performance described above. In June 2021, the AGM approved the report with the votes in favour of 99.96% of the share capital in attendance.

¹ Full explanation of the functions, powers and members of the Audit and Sustainability Committee available on the website: [functions, powers and members of the Audit and Sustainability Committee](#)

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POLICY BOOK

The Policy Book, approved by the Audit and Sustainability Committee, contains the commitments and principles of action applicable to all the group companies in economic, social, environmental and good governance terms.

- Sustainability policies
 - Sustainability and Innovation
 - Economic and Good Governance Sphere
 - Social Sphere
 - Environmental Sphere
- Other policies: ACCIONA's General Communication Policy, the Board of Directors' Composition Policy, the ACCIONA S.A. Directors' Remuneration Policy, the Policy on Personal Data Protection and Guarantee of Digital Rights in ACCIONA, and the Cybersecurity Policy.



More information: [ACCIONA's Policies Handbook](#)

The Global Sustainability Management is the corporate area that organises and promotes the initiatives and commitments of the 2025 SMP. This area reports to the Chief Financial and Sustainability Officer (CFSO) and to the Audit and Sustainability Committee. The purpose of the corporate sustainability function is to maximise the impact of the company's solutions and foster ACCIONA's leadership in non-financial matters.

Each business division has its own sustainability teams, which drive and monitor their specific initiatives within the framework of the 2025 SMP. Those responsible for sustainability for each business unit and country, together with the Global Sustainability Management, meet every month at the Global Sustainability Leaders Meeting. At these meetings, the corporate strategy is coordinated and the group's most important projects are analysed.

Apart from the above, it relies on sustainability partners in markets that are strategic to the company. This enables to have direct knowledge of the social and environmental context in countries that are especially important for ACCIONA, as well as greater coordination in the implementation of initiatives.

2020-2025 SMP: WE MUST STEP UP AND WE HAVE A PLAN

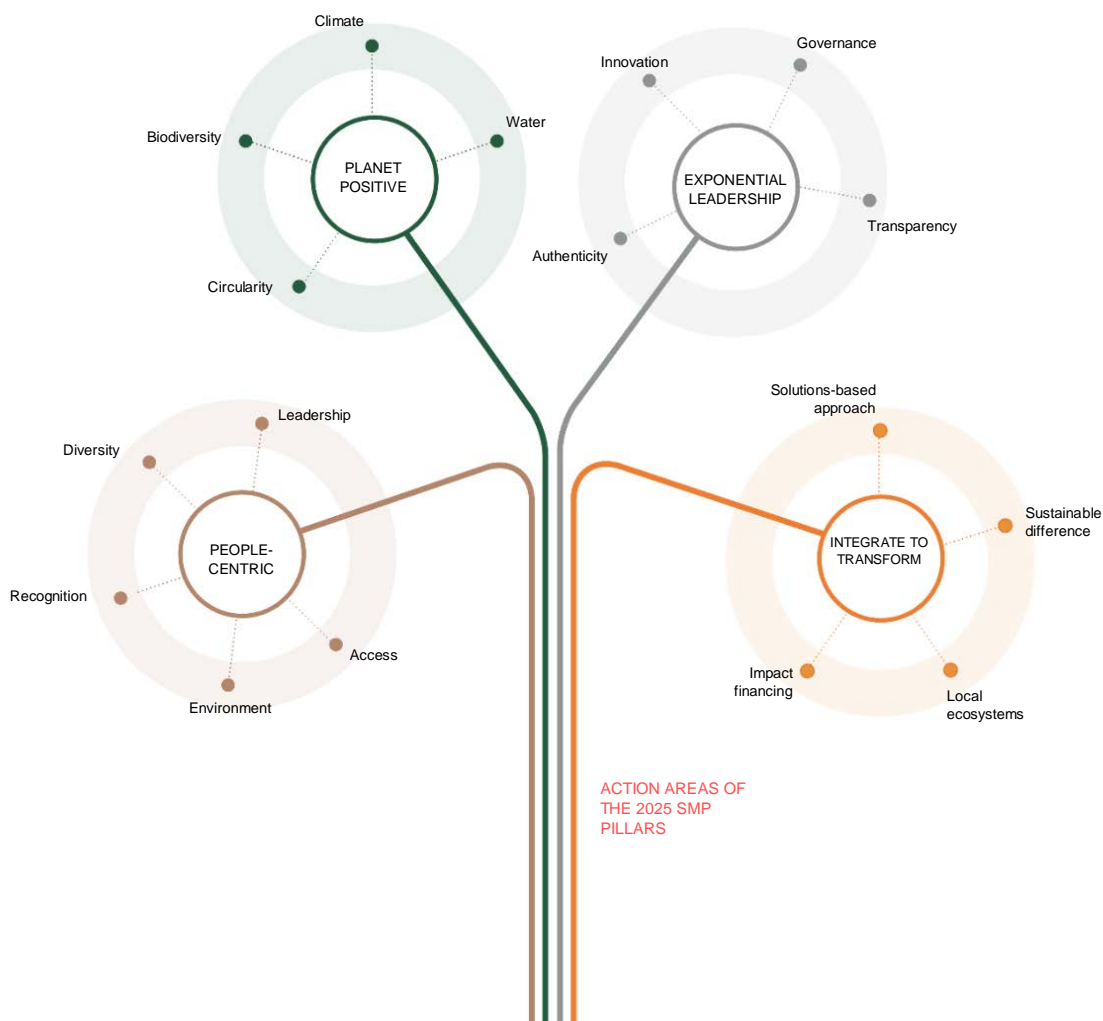
Since 2010, ACCIONA's sustainability strategy has been based on five-year Sustainability Master Plans (SMPs). The actions and targets contained in these plans are promoted, approved and supervised by the Board of Directors' Audit and Sustainability Committee.

The implementation of the company's sustainability strategy and the meeting of commitments are linked to a percentage of the bonuses received by executives, managers and some technical and support staff. This annual assessment considers the achievement of sustainability targets such as the reduction of greenhouse gas emissions, our presence on well-known ESG benchmarks and rankings or the fulfilment of objectives linked to gender equality.

The purpose of the 2025 SMP is to encourage ACCIONA to re-imagine infrastructures. ACCIONA invests in, develops and operates infrastructure assets that can improve our planet's sustainability. The company aspires to become a renowned leader in developing basic infrastructure assets with a positive-impact regenerative value for people and the Earth.

Each of the four 2025 SMP pillars has several action areas and a marked path to produce a regenerative impact by the end of the period set. They are as follows:

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Spreading the SMP

In 2022, we developed many campaigns to deploy and spread the 2025 SMP to ensure employees shared real examples of how the four pillars of the plan are applied. Also, in 2022 we trained over 700 professionals directly through ACCIONA's schemes: Academy, Global Graduate, New Manager, M5 and Global Executive.

On the other hand, we have deployed *ad-hoc* kick-off sessions for the SMP in different countries (Philippines, United States, Canada, Australia, Peru and Norway), we have introduced it to different technical areas (ACCIONA Engineering, ACCIONA Industrial) and worked at great length with different departments in the different business units (research, technological centre, special projects, etc.). In 2022 we also integrated the SMP into projects in countries like Chile and Peru, as well as specific projects (Folloline, Moss, E6, Site C, Pattullo Bridge or Broadway Subway).

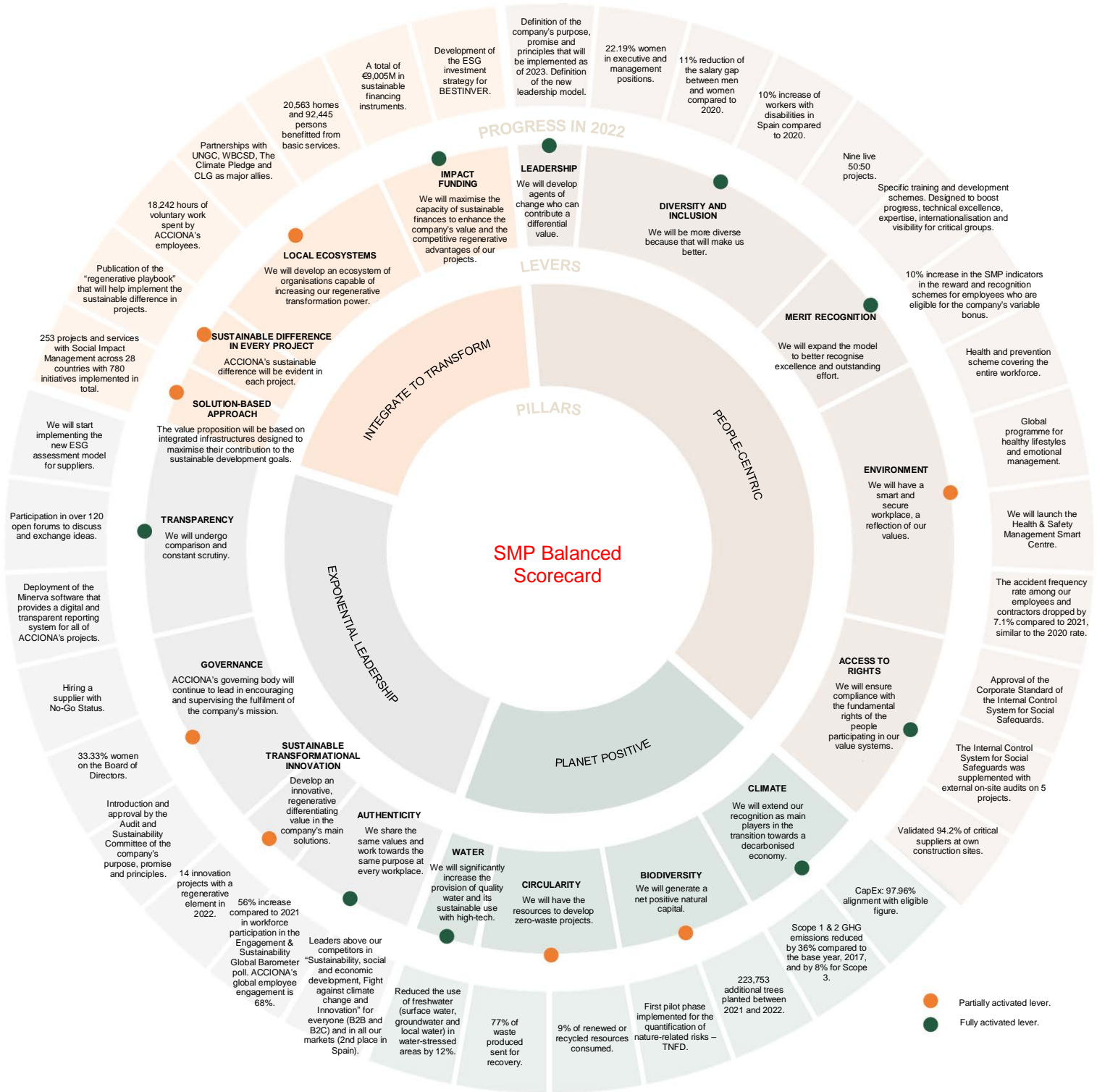
Over the year, we prepared material that expands on the SMP targets in different languages. Examples like the Regenerative Playbook, the Practical Guide for decarbonisation, the training video on decarbonisation, the Decarboniser Club or the video on regenerative infrastructures help ACCIONA to implement the regenerative strategy across the board.

The strategic lines take the form of levers for transformation and improvement indicators proposed by each corporate and business area with a direct impact on them.

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SMP Balanced Scorecard



The following chapters describe in detail the strategies developed and their results in the indicators, as well as other factors that influenced the KPI variation or indicators that measure progress with the 2025 SMP levers.

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RELATIONS WITH STAKEHOLDERS

Communication and constant dialogue are the cornerstones of ACCIONA's relationship with its stakeholders and the individuals and organisations who are directly or indirectly involved in the company's business. In short: employees, customers, local communities, suppliers and subcontractors, public administrations and regulatory bodies, investors and analysts.

The Stakeholder Relations Policy, which is included in the Social Policies Handbook, identifies the main groups and their needs and expectations to favour the generation of shared value and the establishment of long-term relationships.

Interactions with stakeholders

Stakeholders	Means of communication	Matters discussed
Employees	E-mails, newsletters, intranet, engagement survey	Prevention, safety, health and talent management measures, sustainability initiatives
Customers	Apps, CRMs, call centres, open-door events, personal agents	Quality and safety of products and services
Local communities	Web forms, e-mails, phone numbers, suggestion boxes and assistance offices	Local impact of projects
Suppliers and subcontractors	Supplier Satisfaction Survey, procurement email directions	Integrity, occupational risk prevention, Human Rights
Public Administrations and regulatory bodies	Public query processes	Regulatory frameworks for renewable technologies, administrative concessions and public procurement
Investors and analysts	Conferences, roadshows, reverse roadshows and earnings reports	Low-carbon activity

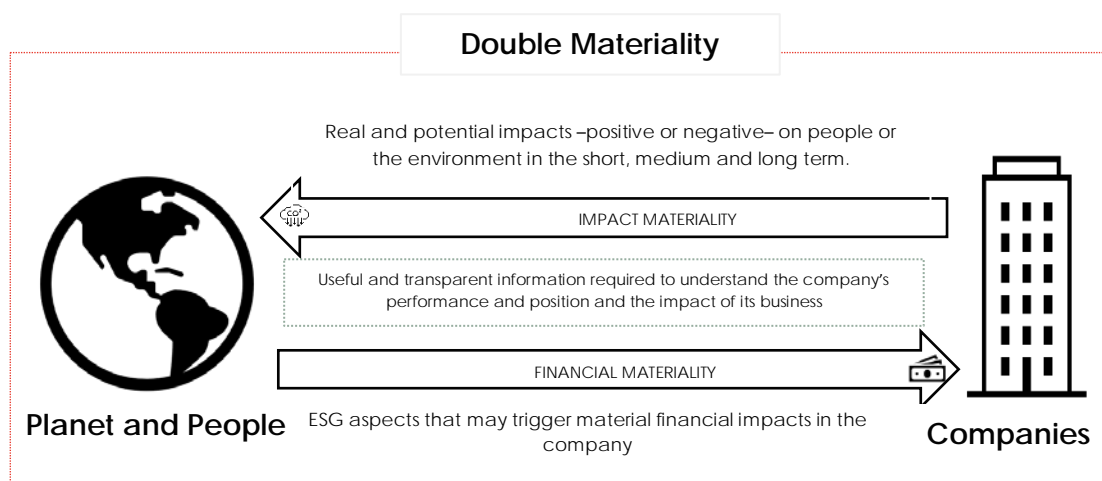
DOUBLE MATERIALITY ANALYSIS (GRI 3-1, 3-2) (ESRS 2)

To identify the contents of this report we used the double materiality approach introduced in the European Sustainability Reporting Standards (ESRS) that expand the reporting duties on matters foreseen in EU Directive 2022/2464 on Non-Financial Information passed on 10 November 2022.

The methodology used is based on two processes. The first is to identify and weigh financial risks and opportunities arising from ESG matters (Environment, Social and Governance) considered over different periods. The second analyses the impacts made by the company and its entire value chain on the economy, society and environment.

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Phases of the analysis:

1. Identification of the topics.

The material topics considered this year were updated based on the research conducted on macro trends included in the Infrastructure Futures Report by the Global Infrastructure Hub and their overlapping with the 2025 Sustainability Master Plan. These were completed with the ten independent industry-specific topic standards published by the European Financial Reporting Advisory Group (EFRAG) on 15 November 2022.

The material topics determined for the analysis this year were validated by the company's main stakeholders.

This year we have increased the number of material topics from 16 (2021) to 18 (2022) on account of the following changes:

- The splitting of the climate change topic into two (Adaptation to Climate Change and Mitigation of Climate Change).
- The merging of the 2021 material topics "Communities" and "Local Development" into a single one named "Development of Local Communities".
- The removal of "Corporate Governance" as a material topic as there is already a specific independent report on this subject.
- The addition of "Innovation in the Industry", "Development of Sustainable Financing" and "Transparency and Dialogue" as separate material topics.

2. Analysis of impact materiality.

- 2.1. Preliminary study of positive and negative impacts by the material topics identified, sorted by business sector. This was conducted taking into account the latest and most prestigious sources for research on each topic.
- 2.2. Analysis of the impact over different periods (in the short, medium and long term).
- 2.3. Assessment of the scale, scope and power to repair the impacts detected on the planet and people by experts in the industries where the company operates.

This analysis provides stakeholders with insight into the impacts produced by the company on the economy, society (including human rights) and the environment.

3. Analysis of financial materiality.

- 3.1. Analysis of the impact caused by external events (not considered in the financial report), related to sustainability topics, on the company's ability to continue generating value in the short,

medium and long term. This is an internal analysis on the likelihood of the material topics detected entailing a relevant risk or opportunity for ACCIONA for the different capitals² (revenue, raw materials, operating expenses, legal changes, market share and asset value).

This analysis offers insight into the company's ability to tackle the risks linked to sustainability.

4. Priority of material topics.

For both analysis, we subsequently set the order of priority for the material topics identified. The methodology used follows the draft of the concept Guidelines for double materiality published by EFRAG on 15 November 2022 and those set by the GRI 3 Standard (2021) on material topics.

Interest of the information disclosed in the report by stakeholders and internal analysis

Material topic	CSRD List
1 Adaptation to climate change	ESRS E1 / ESRS 2
2 Mitigation of climate change	ESRS S2
3 Conditions of the value chain	ESRS 1 & 2
4 Respect for human rights	ESRS E4
5 Conservation of biodiversity and ecosystems	ESRS S1 - 14
6 Health and safety	ESRS G1
7 Corporate code of business	ESRS S5
8 Circular economy	ESRS S1
9 Diversity and working conditions	ESRS S3
10 Development of local communities.	ESRS S1 – 17
11 Talent development	ACCIONA
12 Responsible taxation	ACCIONA
13 Cybersecurity	ESRS S4
14 Clients and fair trade	ACCIONA
15 Development of sustainable financing	ACCIONA
16 Transparency and dialogue	ACCIONA
17 Innovation in the industry	ACCIONA
18 Scarcity of water	ESRS E3

The vast diversity of industries ACCIONA operates in places the company in a unique position to identify its impacts on the planet and people, and the contextual risks and opportunities that may affect its ability to generate value.

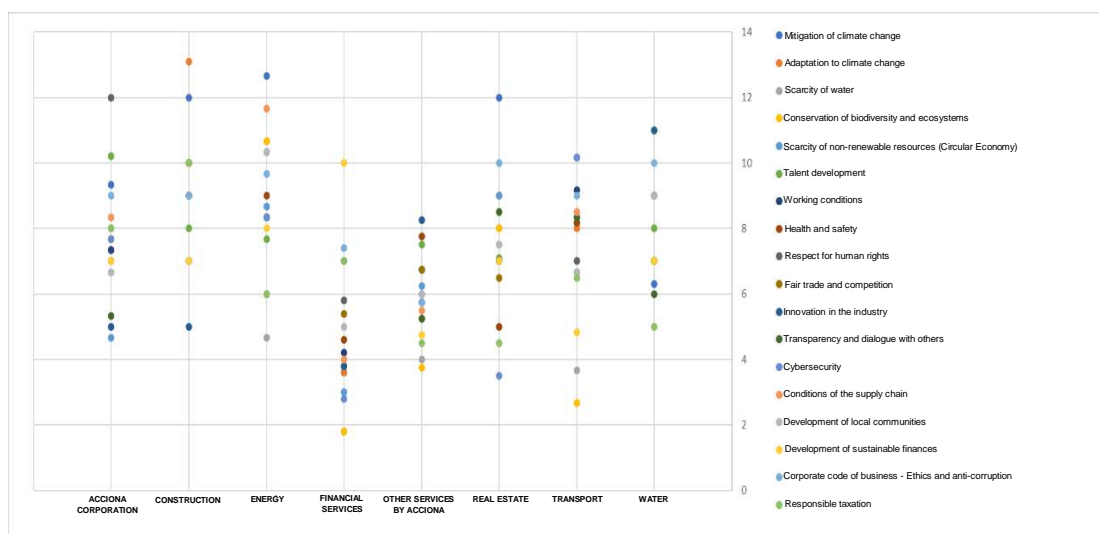
According to the procedures set out by the European Financial Reporting Advisory Group (EFRAG), the 18 material topics reported herein belong to the *Important* category or a higher one and are therefore relevant and should be disclosed in this report. In order to meet the regulatory requirements, the company helps monitor the standards and provides its own additional matters which it deems material. The ESRS E2 on pollution is explained throughout the Planet Positive chapter.

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² The capitals were drawn and adapted from those laid down by the International Integrated Reporting Council (IIRC).

Analysis of materiality by industry



The chart shows the relevance of the information sorted by ACCIONA's business sectors. The development of its financial impact on the company is explored for each material topic.

NON-FINANCIAL RISK MANAGEMENT

Risk management is part of ACCIONA's strategic management and is led by the Board of Directors. It consists of identifying, assessing and managing the potential events that might affect the company and its businesses. This process ensures an appropriate treatment and control of the resulting risk scenarios and keeps them within an acceptable tolerance threshold.

In addition to the Board, the bodies responsible for the Risk Management System are the Audit and Sustainability Committee, the Finance and Sustainability General Management, the Risk Management and Control Units, and the Divisional Management Committees.

The process of non-financial risk management is carried out on a yearly basis. Each risk event (financial and economic, strategic, operational and unforeseeable) is assessed using criteria such as probability, economic-financial impact, impact on image, impact on sustainability and development, the company's ability to manage it and risk management decided by the company.

The analysis is conducted from four perspectives: market, financial, emerging trends (including cybersecurity) and ESG - also known as non-financial or sustainability.



More information: [Risk management system in the Corporate Governance Report](#)

ESG risk assessment

ESG Risk Management in the business development process: from validating the geographical area to approving the opportunity.

ACCIONA has its own methodology to analyse risks and opportunities linked to each territory and to the business opportunities it is involved in.

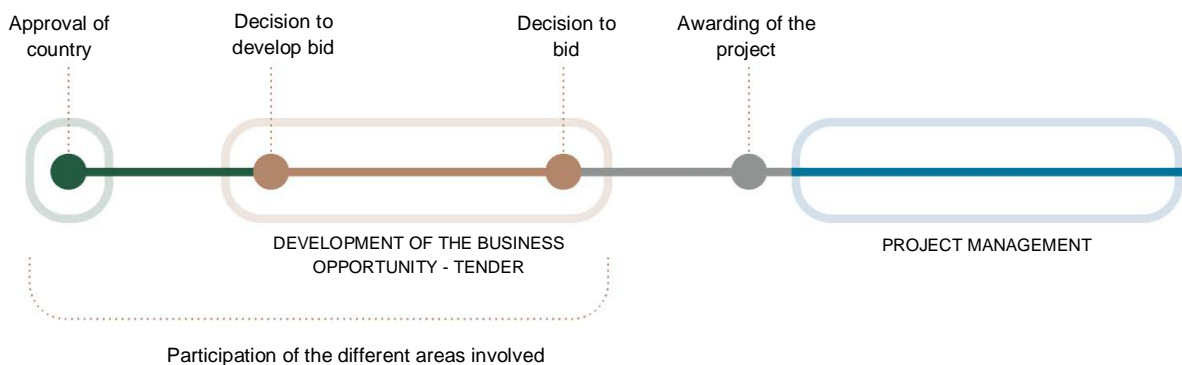
This methodology aims to maintain the level of exposure to the risk within the limits set by ACCIONA, identifying and tackling the risks and opportunities at an early stage. At present, it is applied to the opportunities identified and developed by the Infrastructures division.

The procedures making up the methodology ensure that both the territories ACCIONA operates it and the business opportunities go through a process to analyse the different aspects (business, regulations and other relevant factors) that may mean a risk or an opportunity for the company.

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In line with ACCIONA's sustainability strategy, we have worked to fit the analysis of ESG criteria into all the stages of the opportunity assessment. This allows us to align the portfolio of business opportunities with the corporate strategy and the commitments undertaken by ACCIONA with third parties.

Chart showing the different analysis conducted over the life cycle of a business opportunity



Firstly, the in-house procedure “Approval of country to develop an opportunity” is the step that defines the way in which the risk involved in each territory is analysed and quantified, based on the information and documentation gathered from databases from international sources with a good standing along with the analysis provided by the areas in charge.

The result is the classification of countries based on the level of risk to the company. If a business opportunity is identified in a country that has not been analysed before, it will be subject to a specific analysis.

On the other hand, when an interesting business opportunity is identified, we apply the “Approval of business opportunities”, which defines the stages, analysis and approvals the opportunity must undergo.

In general, this procedure involves two analysis and approval stages: a first stage where we determine if ACCIONA should invest resources to develop a bid for the business opportunity; and a final approval where we determine if the opportunity meets the criteria set by ACCIONA to develop the project without entailing a risk for the company.

The thoroughness of the analysis depends on the availability of information at each stage in the process. In particular, the analysis conducted by the Sustainability area covers the following questions:

- Whether the opportunity aligns with the company's sustainability strategy.
- The potential impact produced by the opportunity on the KPIs regarding the company's performance in terms of sustainability.
- The social and community background of the territory: risks related to labour rights, human rights, etc.
- The risks of social complaints or potential controversy against the project.

The analysis of the potential impact produced by an opportunity on the company's sustainable performance is based on historical information gathered during other similar projects. When considering opportunities that ACCIONA has not developed before, we conduct a detailed analysis to determine the potential risk of said project.

The different analysis are conducted independently by the departments or areas in charge of that sphere. Since 2022, the Sustainability area has been involved in these analysis, assessing the ESG risks of the emerging business opportunities.

The level of supervision applied to each opportunity varies depending on the amount of the contract and the business for which the opportunity was identified. Both the territories considered for potential projects

and the specific business opportunities undergo checks and are put to the vote by the Approval Committee who makes the final decision on the opportunities. The process ends with the approval or rejection of the business opportunity depending on ACCIONA's acceptable risk levels.

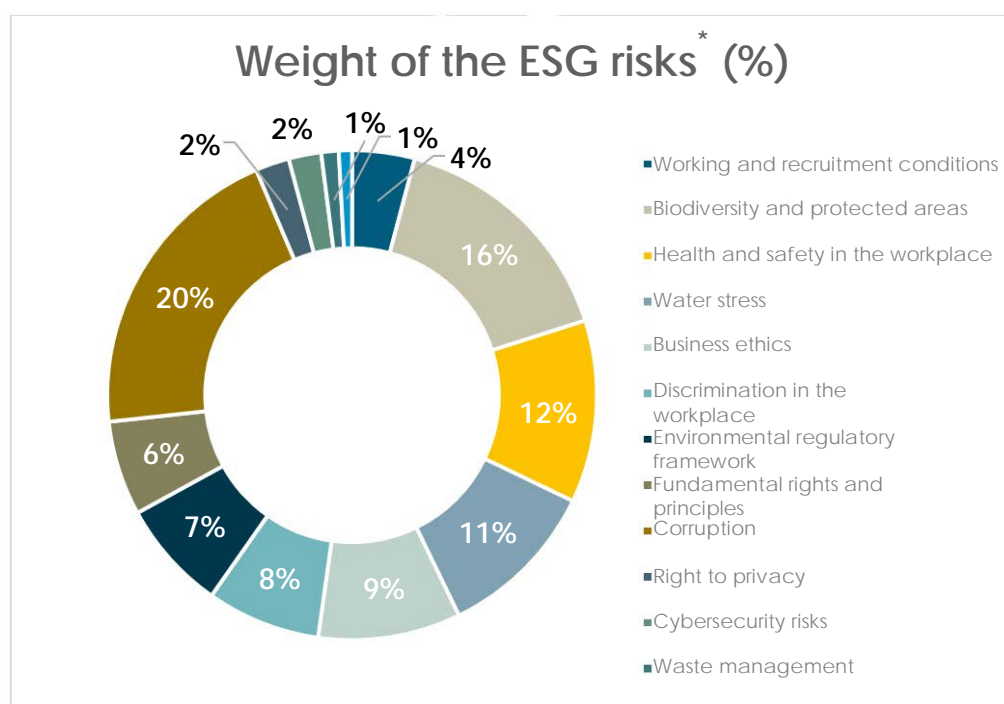
ESG risk assessment for projects in the pipeline

The ESG risk assessment offers, first of all, a materiality analysis of the risks faced by ACCIONA in connection with environmental, social and governance aspects, as well as a deeper insight into the likely financial impact on the company if the project were to materialise and the response measures against the risk that are in place or may be put in place at the company's facilities.

In 2022, ACCIONA made progress in developing its ESG Risk Management System. The new improvements this year were:

- A higher level of granularity obtained locally for all of the company's facilities.
- A higher number of ESG variables assessed in a standardised way (28 variables).
- A broader amount of information collected locally focusing on the facilities that show the greatest inherent risk.
- More details on the measures in place or to be put in place to mitigate the risk for each project.

Over 900 ACCIONA facilities were appraised depending on the likelihood of each risk suggested by the 28 ESG variables analysed, depending on the territory and an objective indicator of the economic-financial repercussion for each risk. This first analysis helped us point out facilities with a high inherent risk for which we conducted a second analysis locally, which allowed us to adjust the first conclusions drawn and investigate the mitigation measures in place against the risks and propose new mitigation measures where necessary.



* Rounded off

Some conclusions drawn during the querying and analysis of ESG risks are:

- The amount of facilities with a high ESG risk is under 2.5% out of all the company's sites. These facilities belong to the Infrastructures division.

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- The risks with a highest weight across all the company's facilities are: corruption (20%), impact on biodiversity and protected areas (16%), health and safety in the workplace (12%), water stress (11%) and business ethics (9%).
- By country, the sites with a higher average ESG risk are in Kenya, Dominican Republic and Nicaragua, countries where ACCIONA barely operates at present.

More information: chapter "Planet Positive" below.

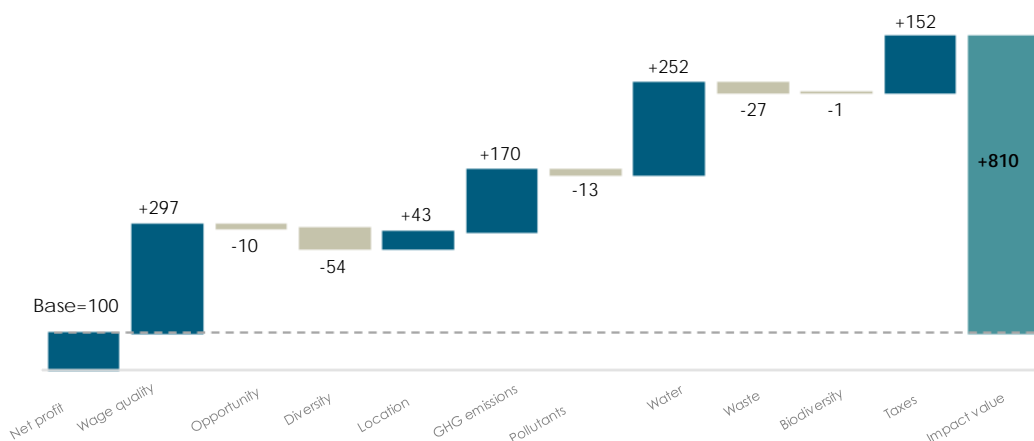
MONETARY VALUE OF THE IMPACT

Investors are increasingly demanding information on the quantification and monetary valuation of the impacts deriving from business activities. ACCIONA has decided to participate in the Impact-Weighted Accounts initiative (IWA) of Harvard Business School which develops a methodology allowing the financial, social and environmental performance to be reflected in a transparent and useful way for both investors and the company's managers

In 2020, ACCIONA prepared a pilot scheme to monetise the group's impacts and this year, the same was done for the entire group. This involved calculating the social externalities using the Harvard methodology, and the environmental externalities using a variety of monetisation factors published in the Environmental Prices Handbook (EU 28 version) and True Pricing, amongst other references.

With these calculations, the company has obtained the monetary value of the impact produced on society by its activities in the last year. Also, they have allowed a single, comparable measurement that can assist in decision-making when there are *trade-offs* between various impacts. The graph shows the monetised value of the positive and negative externalities, which are added to or subtracted from the net profit.

Estimated annual monetary value of the impact produced by ACCIONA in 2022, according to the IWA methodology (on the basis of net profit)



The externalities taken into account to calculate the value of the impact produced are:

- Quality of salaries paid to its employees, adjusted according to each country's minimum living wage and the gender salary gaps.
- Difference in opportunities between men and women in the access to senior positions.
- Similarity between the diversity of demographic distribution of the workforce and the demographic distribution of the local population in each country.
- Creation of local employment, based on the hypothetical rate of unemployment without the presence of the company.
- Emissions avoided as a result of the activity and generated along the entire the value chain.

- Emission of contaminants such as NOx, SOx and PM10.
- Drinking water consumption, drinking water production and waste water treatment.
- Waste generation.
- Occupation and transformation of habitats and their restoration.
- Taxes borne.

It is estimated that the company's business activity has contributed a direct benefit of 8.1 times its net profit. This added value is largely due to the quality of the wages paid, to the greenhouse gas emissions avoided, to water management (desalination, treatment and purification), and to the economic contribution to society deriving from the payment of taxes.

This practice has confirmed that the actions that generate the greatest added value for society are those aligned with ACCIONA's values and strategies: the importance of people, the fight against climate change and water scarcity, and support for local economic development.



More information: [IWA initiative by Harvard Business School](#)

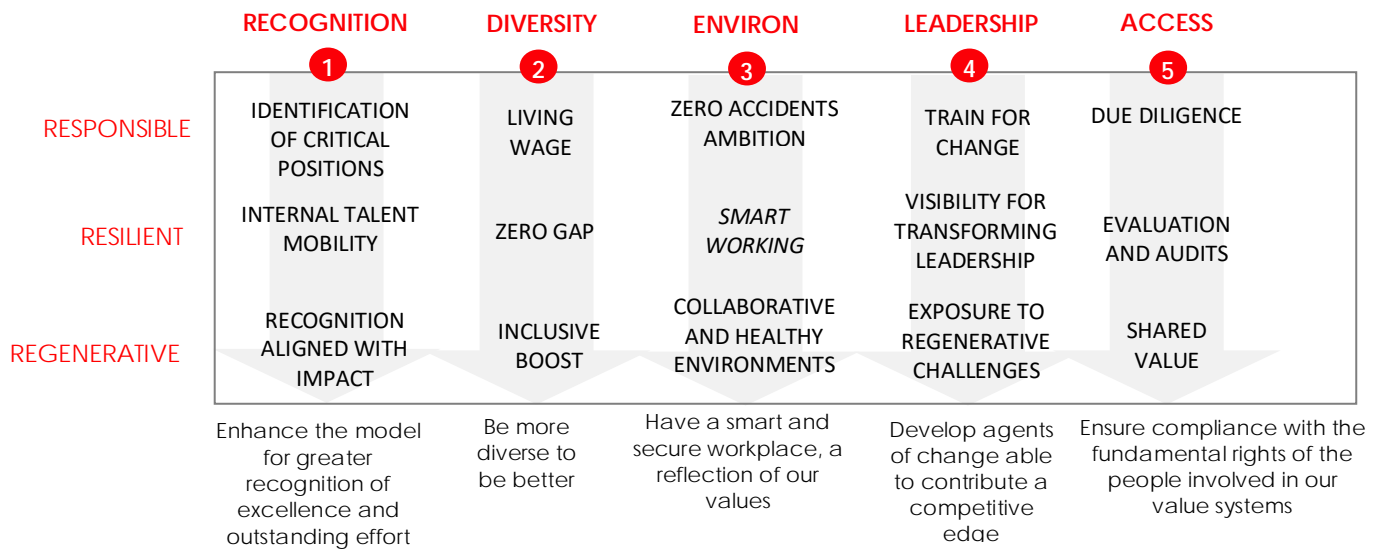
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People-centric

Our advantage comes from people

ACCIONA seeks to develop a people-centric business proposal.



KEY MILESTONES 2022

- > Courses given on employer branding, the creation of channels to attract talent and recruitment methodologies that encourage diversity.
- > Launched ACCIONA's Institute of Technology to identify, design, execute and escalate learning solutions related to ACCIONA's regenerative mission.
- > Consolidated the in-house academies, creating a new academy based on said model but focused on learning about technology and transformation.
- > Top Employer certification in Mexico, United States, Brazil, Canada and Australia and with the continental seal in North America.



MAIN CHALLENGES 2023

- > Global deployment of a new online assessment tool for the first stage of the recruitment process and implementation of an action plan linked to the conceptual update for the main groups of candidates.
- > Implementation of the International Mobility Programme aimed at the company's Technical/Expert staff and consolidation of the Developmental Conversations process to keep on incorporating key tools that will help expand this culture.
- > Boost the management of technical and cross-disciplinary learning based on the model of the Academies with a view to developing employees in key skills in technical areas and/or critical functions to improve performance. In 2023, a Sustainability academy will be created.
- > Implement several pilot schemes for experiences with Virtual Reality, Augmented Reality and Mixed Reality, some of them aligned with ACCIONA Metaverse.

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- > Approved the Diversity and Inclusion Policy. The percentage of women in executive and management positions has been increased.
- > Deploy paperless initiatives with new tailor-made learning itineraries.

PEOPLE

Past crisis have taught us that companies that follow a defined and clear mission tend to be more resilient. They face uncertainties assertively and are able to tackle them, mitigating their negative effects and coming up with solutions that have a positive impact on society and the planet. Similarly, it has been proved that people tend to increasingly appreciate companies that consider social and environmental commitments that match their own personal resolutions.

It is necessary to develop resilience skills that will help us handle changes and thrive in the long run. In order to deal with the new challenges brought on by a sustainable development, there must be a connection between the organisations' mission and the people that will gain their engagement, making them feel that their contribution to said mission is valuable.

As a company, ACCIONA aspires to produce a positive impact with everything it does, developing regenerative infrastructure solutions that will enable a sustainable future. This aspiration can only be achieved by relying on talent, leadership and people's engagement.

PEOPLE is the global strategy devised to place people at the centre through five fundamental pillars – recognition of merit, diversity and inclusion, transformative workplace, leadership and access to rights– with clearly defined goals and placed at the same level as the financial and environmental ones.

The PEOPLE strategy binds the company's mission to the people, activating it to become part of the employee's experience and investing to include and boost the best diverse talent. Thus the organisation becomes stronger and more dynamic in tackling the challenges and opportunities involved in producing a real change and leading transformation towards a sustainable future.



MERIT RECOGNITION

Recognition contributes to strengthen the company's values by highlighting each person's contribution and their bond with the shared mission.

ACCIONA promotes new forms of recognition that align people's aspirations and priorities with the organisation's needs.

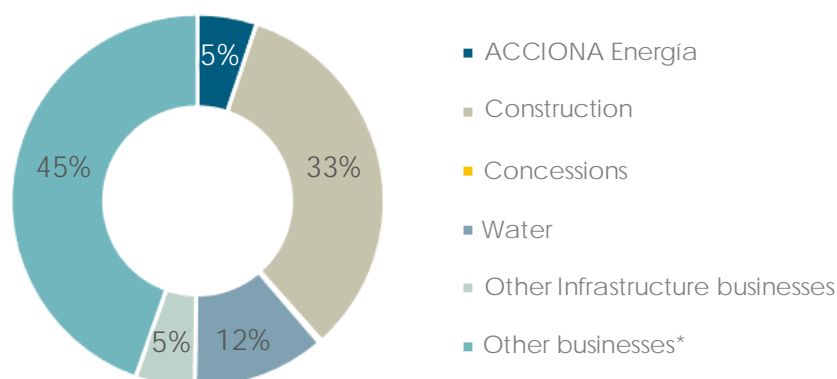
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Through this pillar we aim to reward the attitude and proactivity shown by the people who contribute to materialise the company's mission in an exceptional manner. To do so, we devise and design motivating and personalised experiences where the employees can bloom, feeling that the company appreciates their contribution and they are part of a bigger mission aimed at leaving a positive mark on society and the planet.

Profile of ACCIONA's human team

In 2022, ACCIONA ended the year with a total of 45,892 employees, 27% of them women. As a whole, the company's workforce includes 140 nationalities working in more than 40 countries.

Breakdown of the total workforce by line of business (%)



* It includes Bestinver, Corporativo, ACCIONA Inmobiliaria, ACCIONA Cultura, ACCIONA Facility Services, ACCIONA Mobility, Silence, ACCIONA Airport Services, ACCIONA Forwarding.




Evolution of management indicators

Indicators *	2019	2020	2021	2022
Revenue (million euros)	7,191	6,482	8,104	11,195
Workforce cost/revenue (%)	22%	24%	22%	19%
Revenue/workforce (euros)	181,138	168,999	194,516	243,443
EBITDA (million euros)	1,356	1,133	1,483	2,068
EBITDA/workforce cost (%)	85%	72%	83%	99%
EBITDA/workforce (euros)	34,384	29,535	35,592	44,974
Workforce cost (million euros)	1,599	1,551	1,787	2,077

* Rounded off

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Talent development and promotion

Talent development			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Critical	<ul style="list-style-type: none"> • Loss of market share • Higher operating costs 	<ul style="list-style-type: none"> • Revenue increase
	Important	<ul style="list-style-type: none"> • Loss of market share • Higher raw material costs • Higher operating costs 	<ul style="list-style-type: none"> • Lower operating costs
	Important	<ul style="list-style-type: none"> • Loss of market share • Higher operating costs 	<ul style="list-style-type: none"> • Revenue increase
ACCIONA media: Information			

ACCIONA's people management model is supplemented by policies and initiatives designed to optimise employee performance, enhance their career advancement and manage objective target-based compensation. ACCIONA's Performance Management Model is based on two tools: My Development and Performance Status.

ACCIONA has carried on applying the identification process of performance and potential –known as Performance Status– as a means to provide a comprehensive view of internal talent that will help with the decision-making and the design of action plans based on the needs detected. This process takes place once a year in every country and in every business unit in ACCIONA for employees with a technical or similar professional category. In 2022, 13,862 professionals from all the business units and countries formed part of the Performance Status scope group.

Employees subject to the Performance Status process by gender and professional category

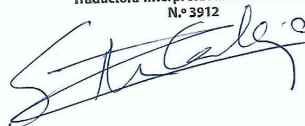
	Men	Women	Total
Executives and managers	2,278	665	2,943
Technical staff	4,585	2,357	6,942
Support staff	74	318	392
Operators	3,336	637	3,973
Total	10,273	3,977	14,250

Development Programmes

These programmes boost the development of ACCIONA's collaborators and is aimed at groups identified as high performance and high potential people. The programmes have a global scope and, according to their category in the company, are as follows:

- **Programme for Grade II Technical staff:** designed jointly with ESADE business school to train the participants with key competencies and skills to continue developing their professional career. The programme has two parts, a self-assessment questionnaire and six online sessions by discipline. In 2022, 114 professionals took part in it.
- **Career Fast-track Programme:** the purpose of this programme is to promote the development and fast-track the career of female Grade III Level 4 technical employees who have obtained good results in a sustained manner over time and are identified as high-potential workers. The programme consists of five sessions for each of the key competencies plus an *on-the-job* action session, with the possibility of participating in a *mentoring* process. Over 2022, the programme was extended to 51 professionals.

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- **New Manager Programme:** jointly designed with the *joint venture* formed by Financial Times and IE Business School to equip participants with the skills and tools to develop new ways of working in their new role, providing them with a level of knowledge and development of competencies in the areas of leadership, innovation, persuasion and global business vision. At the end of the programme they can participate in a *mentoring* process. 195 Grade I managers took part in the 2022 programme.

Internal mobility

The commitment to internal mobility promotes the availability and fitting of talent in an efficient manner, and the adaptation of the person to the position where they can reach their best performance. This contributes to the professional motivation, development and advancement of ACCIONA's workforce.

The main aims of the corporate framework of mobility are:

1. To foster a common culture as a company that offers equal opportunities of development in different sectors, positions and geographic locations in a transparent manner, in order to implement its diversification and internationalisation strategy.
2. To develop a route for internal promotion instead of external recruitment, thus conserving expertise, and promoting the economic and operating efficiency.

Thanks to the centralised visibility of all the job vacancies published on the internal mobility portal, to the information distributed focused on mobility and the weekly *newsletter* that includes the major job offers, the number of job applications from employees exceeded 1,900 in 2022.

Paperless learning programme. Every sheet counts

With its Paperless programme, ACCIONA aims to increase the use of technological tools and digital skills among its employees.

At the same time, we reduce paper consumption across the board and allow an efficient space management by reducing storage to a minimum.

So far, over 1,489 employees have taken part with an impact of over 100,000 kilos of paper saved.

Compensation policy

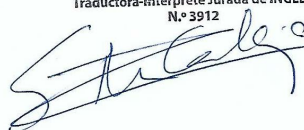
ACCIONA considers that remuneration has an impact on the development and well-being of the communities where it operates.

The company operates in over 40 countries and remunerates its employees according to the following criteria: sectorial and geographical competitiveness, internal equity and merit. Also, based on the current laws, the employees' remuneration is subject to the applicable collective bargaining agreements. In 2022, the company handled 349 collective bargaining agreements, 304 of them in Spain.

The strategy of keeping a competitive remuneration system shows in the remuneration policy, which aims to establish a suitable remuneration method that fits the people's engagement and responsibilities. The target is to retain and motivate our employees and also contribute to help ACCIONA meet its strategic goals within the framework of its business.

In view of the above, the employees' remuneration is defined according to results and a job category system that organises objectively each worker's contribution to the company. Furthermore, our remuneration policy always ensures that there is no room for discrimination in the remuneration policies and practices for reasons of age, race, ethnicity, colour, national origin, gender, sexual orientation, gender identity, marital status, family responsibilities, disability, sensitive medical conditions, social origin, religion, political opinion, training, background, employment options or any other circumstance.

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In 2022, the Spanish state published its decision to amend the general nationwide collective bargaining agreement for the building sector and this applies to a large part of ACCIONA. The company promoted that a collective Social Benefits Scheme be added to the remuneration policy for a large number of employees working in this business. This scheme supplements the state pension system and is an act of co-responsibility with the Spanish social benefits system.

Variable remuneration plan: ACCIONA Bonus

The programme for employees entitled to bonuses is based on objective and pre-established metrics. The programme has been in place since 2012 and depends on the financial results of the company, of each division, of sustainability performance and employees' individual goals.

In accordance with the objectives set out in the Sustainability Master Plan (SMP), ACCIONA Bonus is being extended internationally to all divisions in key countries.

Standardised structure of objectives that make up the bonus

ACCIONA's overall results	Specific targets	Individual targets	Criteria linked to sustainability
They represent at least 5% for all employees and 10% for executives.	Relative to the division, country or business unit with its own income statement.	The basis is the individual assessment of performance.	They represent 10% of the targets. This has increased from 3.5% in 2019 and the aim is to increase it by 12.5% by 2023.

For ACCIONA Bonus, managers propose the level of achievement of individual objectives on a platform that applies to the calculation of the individual part of the bonus. The criteria for this tranche are established according to the personal contribution to the business results:

- Specific contributions (individual objectives) and technical excellence in the work that contributes to progress made in the income statement.
- Tasks and objectives planned at the start of the year, as well as any objectives or priorities that may arise subsequently.
- Support for long-term transformational projects: sustainability, digitalisation, etc.
- Contribution to the multidisciplinary and multifunctional work teams.
- Contribution to the results in terms of flexibility and capacity to adapt to the requirements.

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Criteria linked to sustainability

In order to incorporate the sustainability and decarbonisation strategy across the board, ACCIONA is gradually increasing the weight of sustainability performance in the ACCIONA Bonus (generally applied in the businesses and countries where it operates).

The ACCIONA Bonus includes sustainability objectives within the framework of the Sustainability Master Plan areas. From 3.5% in 2019 to 10% in 2022. The company intends to increase the weight of this Sustainability indicator in the ACCIONA Bonus to 12.5% in 2023, which would speed up, if approved, the fulfilment of the target set in the 2025 Sustainability Master Plan.

Sustainability objectives are measured globally by division and/or line of business and are linked to targets such as:

- **People:** health and safety (minimising accident rates), development and incentives, diversity and inclusion, increase in the number of women in executive and management roles, and training.
- **Taxonomy:** alignment of the CAPEX with the EU taxonomy > 90%.
- **Decarbonisation:** compliance with carbon budget in each business.
- **Leadership:** leading positioning in the most prestigious rankings and indexes.

ACCIONA Bonus in figures

No. of employees benefitted	6,432
% of executives	3.7%
% of managers and technical and support staff	84.6%
No. of countries	34

Employee benefits

In 2022, the social benefits offered by ACCIONA were:

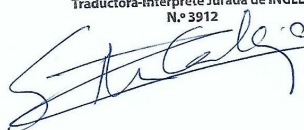
- **Financial coverage** worldwide to employees who were in hospital for COVID-19 more than five days.
- **Accident coverage:** covering the commitments undertaken in the different collective bargaining agreements that may apply and accident policies insuring expatriates and their families in case of an incident that causes death or absolute permanent disability.
- **Life insurance:** insuring the commitments assumed in collective agreements in case of death or disability for any reason.
- **Travel assistance:** it covers business trips globally for less than a year. For expatriates and their families, it is complemented with a health insurance policy for expatriates.

In addition, the Flexible Remuneration Plan allows the group's employees to optimise their salaries nationally. They can select, acquire and/or hire certain benefits at deep discounts, which will allow them to maximise their remuneration. The following products and services are adapted to their needs: medical insurance, meal and childcare vouchers, transit passes and training programmes linked to their professional development and a stock option plan to encourage employees to own a stake in ACCIONA's share capital.

In 2022, ACCIONA made the following benefits available to its employees:

- Health insurance for employees, their spouses and children.
- Meal vouchers for employees working at sites that do not currently have a canteen or a similar benefit.
- Childcare vouchers for employees with children aged 0 to 3 who need this service.

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- Childcare vouchers for employees with children aged 0 to 3 who need this service.
- Transport pass for employees who buy their ticket or transport pass (bus and underground) with a tax-exempt pass within the limits established by law.
- Training and qualification programmes in 2022 where the employees can choose the ones suitable for their job and professional development.
- Shareholder Plan for any employee working for the ACCIONA Group in Spain.
- Life Insurance and Accident Insurance: in 2022, we added the choice of contracting these two new products without tax benefits through the tool used to contract products under the Flexible Remuneration Plan. These two products are supplementary and with added coverage aside from the insurance policies ACCIONA has already established for its professionals.

The current Shareholder Plan aims to encourage employees to become shareholders in the company. This is a voluntary scheme that allows the company to redistribute part of the variable monetary remuneration and/or sets a limit of 12,000 euros per year by awarding shares in the organisation according to the regulatory framework, which foresees tax benefits for this type of plans. This plan is aimed at every ACCIONA employee resident in Spain for tax purposes to own a stake in the company's share capital.

397 employees in total were awarded shares as part of the Shareholder Plan, which brings the number of shares in ACCIONA S.A. delivered under this plan up to 18,099.

Selection policies

The selection function intends to attract the best talent at the right moment, creating innovative and competitive strategies to position ACCIONA as a reference employer and offer a differentiated experience to its candidates. The function is based on four key pillars:

- **Brand as employer.** ACCIONA's reputation as employer is based on the commitment to sustainable employability, the early identification of talent, investment in employee development and offering international opportunities. ACCIONA has renewed its Top Employer certification, which recognises the company as one of the best employers in Spain and has achieved the certification in Canada, United States, Brazil, Mexico and Australia, as well as the continental seal in North America.
- **Channels to Attract Talent.** The organisation designs innovative strategies that ensure the visibility of its global and local offers, responding to the extensive portfolio of profiles and its commitment to diversity and always connected to the market to keep abreast of trends and best practices.
- **Selection methodology.** We apply the same methodology globally ensuring coherence and high quality standards in all its processes.
- **Candidate's experience.** The company values persons, connects with talent and appreciates diversity. This is why the company continuously reassesses its processes with the candidate's experience at the centre.

With the model to create a global pool, we respond to the needs of ACCIONA in the medium and long term, attracting talents from the beginning of their professional career, thus creating an environment of opportunities to promote career advancement within ACCIONA.

For this purpose, the company has developed different programmes that implement this model:

- **Academy Programme:** here young students have the chance to expand their network by meeting ACCIONA employees and learning about soft skills and sustainability concepts through practical challenges adapted to the company's reality. In 2022, five new events were implemented in Spain, Mexico, Chile, Peru and Brazil with 130 participants.
- **Trainees' programme:** the aim of this is to put into practice the knowledge acquired at university and get the chance to start their professional career in the company. 426 trainees were incorporated globally in 2022.

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Global Graduates Programme

The programme is for new graduates (with up to 2 years' employment experience), for them to achieve a postgraduate qualification, given by a business school, which gives knowledge, skills and tools to discover their potential in the first stage of their professional career.

Once the first year in the company is completed, the graduates begin a postgraduate qualification, taught at ICADE university, which gives the graduates knowledge, skills and tools to discover and make the most of their potential in the first stage of their professional career.

The training is divided into four modules (Sustainability, Finance & Strategy, Project Management and Future Societies) and through them they acquire a base of cross-disciplinary knowledge and skills to put them into practice in any professional context of ACCIONA.

In total, 141 graduates participated in the third event of this global programme that ended in October 2022.

Evolution of new hires by line of business (no. of employees)

	2021			2022		
	Men	Women	Total	Men	Women	Total
Energy	264	128	392	308	159	467
Infrastructures	7,080	1,391	8,471	8,239	1,506	9,745
▪ Construction*	4,776	767	5,543	6,573	1,022	7,595
▪ Concessions	17	15	32	18	10	28
▪ Water	1,543	314	1,857	1,083	251	1,334
▪ Other infrastructure businesses	744	295	1,039	565	223	788
Other businesses*	4,649	3,274	7,923	6,274	4,500	10,774
Total new hirings	11,993	4,793	16,786	14,821	6,165	20,986





* The large volume of new hires is due to the temporary nature of the contracts and the hiring cycles, which depend on the projects.

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DIVERSITY AND INCLUSION

Diversity and working conditions

ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden • Lower asset valuation 	<ul style="list-style-type: none"> • Revenue increase • Higher asset valuation
	Important	<ul style="list-style-type: none"> • Higher operating costs • Bigger regulatory burden 	<ul style="list-style-type: none"> • Lower operating costs • Revenue increase
	Important	<ul style="list-style-type: none"> • Lower revenue • Loss of market share 	<ul style="list-style-type: none"> • Lower operating costs
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden

ACCIONA media: Information

Companies know the value of diversity in terms of results and social fairness. Lots of progress has been made, but there is still a long way to go. Although diversity is present in organisation's workforces, inclusion understood as the teams' ability to turn diversity into results is not immediate.

Past crisis have taught us that the key element to overcome them and recover from them is resilience. Resilience helps an organisation broaden its view in the face of the disruptive effects caused by crisis and identify assets in its workforce that translate into opportunity, recovery and sustainability. Therefore, diversity—and especially inclusion—is a fundamental part of the strategy, as it contributes to create resilient organisations that get ahead of changes and produce innovative solutions for complex, ever-changing environments.

Facing the challenges of sustainable development is possible thanks to people's talent, engagement and leadership. This is why ACCIONA understands diversity as a source of talent that brings a key competitive edge to stand out from the rest. It also considers equity and inclusion as top priorities in people management and essential assets to boost sustainable development, the defence of human rights and the fulfilment of the 2030 agenda.

Including the Diversity, Equity and Inclusion policy in the people management model consolidates the company's commitment to develop a diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion through equity and inclusion.

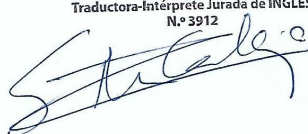
The Policy on Diversity, Equity and Inclusion, the Human Rights Policy and the Code of Conduct of ACCIONA promote real equal opportunities and do not tolerate any type of discrimination in the workplace for reasons of age, race, ethnicity, colour, national origin, gender, sexual orientation, gender identity, marital status, family responsibilities, disability, sensitive medical conditions, social origin, religion, political opinion, training, background, employment options or any other circumstance.

The global Diversity and Inclusion Area and the people in charge of Diversity and Inclusion in the business units make up the organisational structure that is in charge of implementing, reviewing and supervising compliance with this policy, promoting Equity and Inclusion actions and ensuring the attainment of targets.

Sustainable Difference

ACCIONA is made up of 45,892 people from 140 different countries who contribute to the development of skills to anticipate problems and solve them, adapt to the changes emerging in the +40 countries where the company operates and where our business model allows us to build a close relationship with our clients, stakeholders and local talent.

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ACCIONA IS MADE UP OF 45,892 PEOPLE

Diversity and local impact

140

Nationalities

+40

Countries

Gender diversity



Generational diversity



Disability

4.37%
% equivalent of
PEOPLE WITH
DISABILITIES

Through digital tools, the tracking and reporting system allows us to constantly improve in identifying diversity indicators and provide managers with real-time information linked to their people targets. This way, they can manage the diversity of their teams and track target achievement. In 2022, we have made progress in improving data quality and identifying new indicators that will enable the company's managers to make better data-based decisions with a view to boosting the resilience of their teams and succeed in all the environments they operate in.

Gender diversity

ACCIONA promotes the full inclusion of women and their leadership. It is important to remember that the company operates in business activities that generally have a smaller presence of women and, therefore, it develops initiatives that aim to ensure more gender equality in the workplace.

With this in mind, it promotes an inclusive culture with behaviours that help get rid of any barriers preventing equal opportunities and is constantly reviewed, developing specific programmes where needed to promote the attraction, retention and promotion of talent along the different stages of women's professional careers.

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Programmes to boost female leadership

1. **Global programme to fast-track women with potential.** In 2022, this global programme was run for the third time with the participation of 51 women from nine different countries. The initiative aims to promote women's professional advancement and fast-track their career for female staff with a technical role in the company and identified as high-potential employees. The programme has five sessions on key competencies, plus an on-the-job action session and mentoring.
2. **High-potential Women's Development Programme (HPWDP).** Created together with the Spanish School for Industrial Organisation (EOI) and aimed at women in pre-managerial roles with a clear career projection in the company. In the 2022 edition, 17 workers successfully completed the programme.
3. **IWAT (International Women Acceleration Track).** This programme began in 2022 with the participation of 30 women in junior managerial positions in nine countries. The goal of this global programme is to advance the career of these professionals representing the international reality of all the businesses. Through a strategic alliance, this was jointly designed by ACCIONA, the Florida International University and the Nebrija University.
4. **Global mentoring programme for pre-executive women.** The programme was run for a second time with 29 senior managers aiming to boost female talent and leadership among the women working in ACCIONA.

In terms of recruiting in 2022, ACCIONA has encouraged the hiring women and ensuring that every recruitment process includes the application of at least one woman.

These actions are aligned with the objectives set, to increase the number of women in management and executive positions, achieve equal pay and promote women's leadership programmes. Meeting these objectives is linked with the bonus, so that it impacts directly on the variable remuneration of all the people in the company that benefit from it.

At year-end 2022, the percentage of women in executive and management positions globally was 22.19% compared to 21.7% in 2021. In some countries where the company operates, such as Spain, Canada, Norway, South Africa, New Zealand and Peru the percentage is more than 25%.

Female staff

	2021	2022	Variation 2021 - 2022
% Female employees vs. total workforce	27.33%	27.32%	-0.04%
% Women in executive and management positions vs. total executive and management positions	21.7%	22.19%	+2.26%
• Female executives	18.6%	16.95%	-8.87%
• Female managers	22.1%	22.76%	+2.99%
% Female junior managers vs. total junior managers	24.2%	24.53%	+1.36%
% Female executives and managers in business-generating positions (Areas of production and business development)	15%	15.29%	+1.93%
% STEM women vs. total STEM staff	20.6%	19.29%	-6.36%
% of women in technical jobs vs. total staff in technical jobs	32.4%	31.62%	-2.41%
% women vs. total qualified employees	29.6%	34.10%	+15.20%

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SOSTENIBL@s 50:50

ACCIONA's "Sostenibl@s 50:50" projects aim to actively promote female participation and leadership in the company's business activity and its production sites. To do so, it implements re/up-skilling policies and programmes used to:

1. Identify local female talent and promote it to key positions.
2. Reconvert profiles to site qualified staff and offer employment opportunities.
3. Improve female employability to bring them into key sectors of the economy.
4. Generate models replicable by other women, contributing to eliminating still persistent stereotypes regarding female presence in certain activities.

Sostenibl@s 50:50 projects under way in the INFRASTRUCTURES business

Neonatal unit in the Marga Marga hospital (Chile). Built by a team of 35 women, this is the result of a pioneer project to train female builders for which 120 women were trained. It is the first public infrastructure work in Chile focusing on gender. In fact, the Housing Ministry of this country granted the "Women in Construction" seal for it. It also received the "Woman Builds 2021" award by the Chilean Chamber of Construction and the "Organisation that inspires 2021" recognition by the Network for Women in Senior Leadership Roles.

L6 Sao Paulo Underground (Brazil). Under the Women in Construction programme, a segment factory was opened where over 50% of the jobs were taken by women in 2022.

Palma de Mallorca Project (Spain). A team made up of 50% women who are even doing jobs that are traditionally done by men, such as site manager.

Hotel Meliá Lisboa (Portugal). This project will rely on a 50:50 team to handle the building of a 5-star hotel owned by the Meliá chain in Lisbon.

Sidney Airport Project (Australia). This initiative led by ACCIONA relies on a team of 17 female drivers of heavy machinery for earthworks.

Sostenibl@s 50:50 projects under way in the ENERGY business

Women in the Energía Mexico Isthmus Project. Programme for attracting, selecting and developing indigenous women in the area of maintenance and operation. In 2022, we run this programme for the second time and it included 6 female engineers.

Agora Energía Spain Project. Programme for the inclusion of women in Wind Power Production in identified positions.

Energía Chile Project. Working with local universities, a pool of female talent was created to work as local maintenance operators at the different power plants and farms being operated in Chile.

In Spain, all the business lines are covered by Equality Plans, in accordance with Organic Law 3/2007 for effective equality between men and women. These plans are signed with the most representative trade union and the results are reported and evaluated jointly every six months. All the Equality Plans are available on the intranet for everyone in the company.

The Engineering, Facility Services and Energy businesses also have the Gender Equality certification, which was renewed in 2022. There are similar mechanisms implemented in other countries where ACCIONA operates, including Chile, which was granted the certificate for the 3262 Standard for Gender Equality and Work-Life Balance in 2022.

To endorse our commitment to effective equal opportunities, a series of communication and awareness-raising initiatives are carried out, giving visibility to the company's professionals and projects led by women, in recognition of their leadership and position as a role model.

ACCIONA is a signatory of the “Women’s Empowerment Principles” of the UN Global Compact, an initiative that pursues real and effective gender equality through work with seven action principles in the labour, social, educational and health and well-being fields.

As a corporate partner of the Global Compact, in 2020 ACCIONA adhered to the Target Gender Equality project to speed up the contribution to the SDG 5 that aims to achieve gender equality.

Pay gap analysis

In 2022, ACCIONA continued to work on its commitment to eliminate the gender pay gap. For this, it has defined an action plan that includes the following actions:

- Regular analysis of gender pay gap indicators to identify any situations of unequal pay through a review process on each business unit.
- Regular follow-up of the company’s guidelines and management to assess the progress made in each business unit, country and organisational level regarding potential pay gaps.

The gender pay gap analysis are based on a methodology that considers the best international practices in a global and weighted manner. According to the definition of “equal pay”, we isolate from the analysis all those variables that might explain a person’s salary above and beyond gender. It takes into account the applicable variables of country, business, professional classification and collective bargaining agreement. Also, a level map is used to group the business and support roles. The executive level has been broken down by reporting level (D1, D2, D3, D4 and D5), managing to isolate any potential deviations.

This estimate determines standardised segments of population (comparison clusters) on which salary differences between men and women are measured, providing a high degree of reliability in which gender pay gaps are effectively addressed.

To determine the fairness of each segment we use the following formula:

$$\text{Equal pay per segment} = \frac{(\text{average fixed salary for men} - \text{average fixed salary for women})}{\text{average fixed salary for men}}$$

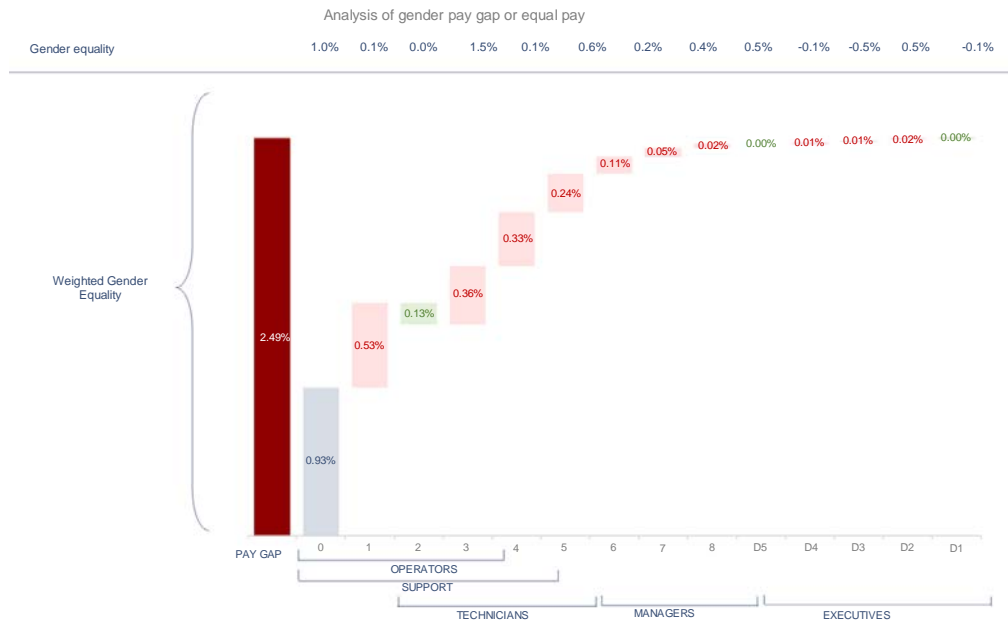
To calculate the pay gap, we weight this indicator based on the weight of each group (comparison cluster).

In 2022, ACCIONA reported a global gender pay gap of 2.49%, slightly improving the previous year’s data by 0.04bp (2.53% in 2021).

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Gender pay gap analysis



Gender pay gap evolution

2019	2020	2021	2022
5.0%	2.8%	2.53%	2.49%

With this information, the data is studied for each business line and level of responsibility to define whether there is unequal pay for equal work or if the difference is due to any other cause (seniority, performance, results, etc.). The aim is to eliminate any cases of inequality.

Through the annual salary review process, we also conduct a specific analysis of unequal pay situations every year. This action plan is periodically monitored by management, who assesses the progress being made at every level in the organisation.

Inclusion of people with disabilities

As a developer of sustainable infrastructures with value for everyone, the company is committed to creating inclusive environments, without barriers and facilitators of the participation of people with disability under equal opportunities.

To make the best contribution possible, ACCIONA relies on the talent contributed by people with disabilities. Along these lines, the Sustainability Master Plan includes the objective of increasing the percentage of people with disability in the staff to 5% in Spain by 2025 and to 2% –or always above the regulatory framework– in key countries. To do so, ACCIONA is constantly reviewing its processes and working on the following:

- Accessibility of the company's job vacancies.
- Identification of inclusive positions.
- Development of global training programmes on disability, workshops to raise awareness and courses on the opportunities and benefits in hiring persons with disability, focusing on identifying and eliminating behavioural barriers.
- Hiring and fostering actions that go beyond adapting the job in order to improve the induction experience, accessibility to digital contents and the inclusion of persons with disability so that they can be involved in the work under equal conditions.

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Evolution of the hiring of people with disability

The number of employees in Spain, hired directly or indirectly, with a disability equal or greater than 33% is 1,000 in 2022, more than the 952 hired in 2021. This represents 4.37% of the total workforce, compared to 3.96% in 2021. 3.84% were for direct hires, while the rest comes from contributions through purchases to Special Job Centres and donations to third sector organisations.

	2019	2020	2021	2022
Percentage	1,032	995	952	1,000
Total number	3.96%	3.97%	3.96%	4.37%

Programmes to boost the inclusion of people with disability

1. **People Programme:** initiative for the inclusion of new graduates with disability. In Mexico, thanks to this programme, 16 new graduates are receiving special training to develop their skills and are getting their first job opportunity in the Infrastructures and Energy divisions. This initiative is possible thanks to our strategic alliances with public institutions. In Australia, through a partnership with Australian Network on Disability, nine trainees joined different areas in the Infrastructures division. In Spain, two trainees with disability joined the company through a partnership with Fundación ONCE and CRUE.
2. **Programme + Diverse + Capable:** This is an inclusive workplace programme to encourage the hiring of people with Down Syndrome or an intellectual disability. Digitalisation has meant that many of the jobs they were doing no longer exist, but this also brings new opportunities. Through this programme, ACCIONA identifies sequential tasks that may be job opportunities for people with an intellectual disability. The initiative is led together with foundations specialising on mental disabilities who help find suitable profiles and raise awareness among the teams who will be working with them. Since the programme began, three people with intellectual disabilities have joined the human resources and administration areas.

Also, the company continues to hold the Bequal certificate, with Bequal Plus rating, which certifies its compliance with the law and ACCIONA's commitment to inclusive disability policies through an external audit.

ACCIONA is a member of the Ibero-American Network of Inclusive Companies that brings together companies committed to disability with public and private agencies that promote the rights of people with disability. Its purpose is to foster a new business culture that will appreciate how much diversity contributes to the market and will encourage inclusive work teams.

ACCIONA is part of the action group "Companies for Equity, Diversity and Inclusion" promoted by Randstad Foundation to activate the mobilisation for the integration of diversity, disability and employment.

Inclusion of minorities and people at risk of social exclusion

ACCIONA is present in more than 40 countries and, as a company and employer, is aware of the role it plays in the communities in which it operates. In accordance with its Code of Conduct and its policies, it respects the rights of the local communities and the people living and working in them in accordance with international human rights standards, making an effort to create positive impacts that improve people's lives in the territories it operates in. For this, ACCIONA is part of different programmes to encourage the hiring of people in vulnerable situations.

The most noteworthy initiatives in 2022 in the area of inclusion in the workplace of people with disability and other vulnerable groups include:

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- 502 people hired from the start of the programme with Fundación Inserta, with whom we work nationwide for the inclusion in the workplace of people with disability.
- 187 people hired through Fundación Integra nationwide through the integration of people with disability, long-term unemployed persons and victims of gender-based violence.
- Collaboration with non-governmental organisations and institutions that work for the labour inclusion of the most vulnerable groups in the territories where the company operates.
- Collaboration with the initiative that brings companies together for a society without gender-based violence (*Empresas por una Sociedad libre de Violencia de Género*) since it began in 2012. As a member of this initiative, our company is committed to encouraging the integration of women who have suffered gender-based violence and, for this reason, supports the work done by foundations like Integra and Red Cross.
- In Peru we joined the project fostering women's employability and access to new business ventures (*Emprendimiento y Empleabilidad con Mujeres*) in Metropolitan Lima, an initiative led with the Spanish Chamber of Commerce in Peru and the Cesal charity, to promote the integration of women who have suffered gender-based violence into the job market.
- Creation of a programme for the inclusion in the workplace of migrants in the Infrastructures division in Australia.
- Execution of an agreement with the Mexican Commission for Refugee Assistance (COMAR) and the civil organisation Ayuda en Acción Mexico for female migrants' inclusion in the workplace in the Facility Services business unit.

A total of 20 ethnic groups form part of the company's staff. Hence, ACCIONA encourages local hiring and protects minorities (B-BBEE requirements in South Africa, *First Nations* in Canada, indigenous people in Australia, immigrant groups in the Middle East and Asia, and other communities). To promote the labour inclusion of these groups, the company develops specific plans in its projects that include training, awareness-raising, elimination of barriers, employment hiring and collaboration with bodies and institutions.

Awareness and development of skills in diversity, equity and inclusion

As part of the policy on Diversity, Equity and Inclusion, the courses on diversity and inclusion are an essential means to raise awareness. It provides tools that help develop skills and behaviours that help get rid of barriers, boost an inclusive-conscious leadership and create a workplace where diversity brings value.

ACCIONA develops training initiatives for equality, diversity and inclusion, against biases and discrimination and in favour of multiculturalism through different courses to create a more inclusive culture and environment. A total of 13,170 hours were taught in 2022, compared to 10,778 hours in 2021.

Internal Networks for Diversity and Inclusion

Through its own internal networks for Diversity and Inclusion, the company spreads good practices across the board. The internal employee networks are groups led by workers who foster a more diverse and inclusive workplace aligned with the company's mission, values, goals and objectives. One of the greatest benefits of these networks is the ability to connect people from different offices or sites, organisational groups, functions, departments and levels, helping to create a sense of community and belonging.

- Internal Networks for Diversity and Inclusion:

The networks that boost diversity policies and programmes have Diversity Committees in all the strategic business units and countries. At present, ACCIONA has 13 committees after the latest one was established in Peru in 2022. These are groups of employees who represent all groups and act as a network of ambassadors: they collect information from their environment, share best practices and create proposals and initiatives on diversity, equity and inclusion. Their role is to escalate the global strategy and adjust it to the local reality.

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In Australia, ACCIONA has a Diversity Network, which is an internal network aimed at promoting an inclusive workplace and encouraging best practices in diversity, equity and inclusion in the Infrastructures division there.

The WIRE (Women In Renewable Energy) programme is an internal network in the Energy division whose purpose is to share knowledge, develop skills and increase the visibility of women.

TRANSFORMATIVE ENVIRONMENTS

The work environment is a stage for opportunities to transform the business culture. It determines the operation, communication, collaboration, motivation and, consequently, the result of the organisations. In order to make the most of the opportunities arising from the workplaces, ACCIONA boosts a diverse and inclusive, collaborative and innovative work environment, adapted to new working methods and future challenges using technology as a facilitator.

ACCIONA aims to ensure safe, innovative, flexible and environmentally efficient workplaces protecting the well-being of its workers and making a positive impact on the work atmosphere and the environment. In 2022, the opening of its new site called CAMPUS ACCIONA MESENA MADRID was a material event for the company as it made the connection between the organisational culture and the work environment tangible. With this in mind, the company works to expand the CAMPUS ACCIONA MESENA MADRID model to all other territories it operates in.

CAMPUS ACCIONA

In 2022, ACCIONA opened its new offices in Madrid named CAMPUS ACCIONA MESENA MADRID. All the main buildings have been awarded at least the LEED Gold and WELL Gold certificates, but in most cases their ratings are as high as platinum for both certificates. These were obtained through an environmental and social-holistic management that takes into account aspects related to: heating/cooling, building materials, healthy diet, sufficient lighting, outdoor views, mental health, thermal comfort, water, suitable acoustics, physical health and exercise, community support, innovation and sound.

The CAMPUS ACCIONA MESENA MADRID site consists of healthy and eco-friendly work spaces that provide a sense of well-being among the people who work there.

In harmony with ACCIONA's regenerative mission, all the buildings in the CAMPUS ACCIONA MESENA MADRID have practically Zero-Energy Building (nZEB) consumption. Buildings 6, 7, 8, 9 and 11 in the CAMPUS use a solar power system that produces approximately 1 GWh per year. Also, Building 7 uses a heating/cooling system that is entirely based on a geothermal system.

In order to decarbonise the installation, it has a system that collects and recycles the vast amount of heat produced by a Data Processing Centre (DPC) that was already installed on the CAMPUS land before it was bought by ACCIONA. The heat collected is distributed as hot water to several buildings and other services on the site. The cooling systems use coolants with low Global Warming Power (GWP).

- The power supply for the installations is 100% renewable (Scope 2). All these measures have enabled a decrease in the CO₂ emissions of 2,388 tCO₂e per year with aggregate savings of 1,260,000 kWh.

Organisation of working hours and the work-life balance

The company is committed to a good work-life balance as a means to promote equality, and to that end has measures in place to support families, beyond regulatory compliance, in the businesses and the different territories where it operates.

A support programme for mothers and fathers has been developed with universal measures and a co-responsibility based approach. The main measures implemented are:

- Support programme for pregnant women with six-hour working days with no salary cuts, parking spaces and financial help to pay for travel expenses to medical tests.
- Paid maternity/paternity leave for the main carer, longer than the legal minimum, of up to 19 weeks that can be alternatively split between the parents.
- Paid maternity/paternity leave for the supporting carer –also longer than the legal minimum– of up to 19 weeks that can be alternatively split between the parents.
- Programme for parents with children suffering from serious illnesses, with a part-time working day with no salary cuts, supplementing the legal frameworks in each country.
- Improvement of the policy of advances for cases related to child care.

These measures are in addition to other measures in place such as home office, flexible entry and exit times, straight shifts, and part-time options, as well as canteen services, medical centres, breastfeeding rooms, childcare support, physiotherapy and sports club at the sites. In countries such as Australia, Canada, United States and South Africa there are special measures for flexible working hours for new parents and for childcare, which are higher than the legal minimums.

Home Office



ACCIONA's Home Office model was implemented in 2021 as part of the PEOPLE strategy with a view to improving people's lifestyle by introducing new work models with the triple objective of generating value for the employees, the company and society. Employees reinforce their engagement and gain flexibility, while the company improves its talent attraction, increases productivity and uses space more efficiently. In addition, it cuts down CO₂ emissions by reducing employees' commute and this benefits society as a whole.

In 2022, ACCIONA developed the Home Office pilot programme that was launched in 2021 by extending it to more employees, benefitting more than 3,000 people in eight countries (Spain, Brazil, Mexico, Chile, United States, Australia, Poland and Philippines). This is more than 92% of the personnel who could opt for this model worldwide.

The model has also begun in the new CAMPUS ACCIONA MESENA MADRID site and is an essential pillar of the policy on workspace that enables employees to enjoy environments adjusted to their needs.

The company's commitment to the new work models shows in the yearly work climate survey as it rose by 5% for the Work Atmosphere and Well-being item compared to 2021 (68% of very satisfied employees in 2022 versus 63% in 2021). This rate is proof of the employees' satisfaction with the work environment and the company's active concern for their well-being.

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The implementation of information technologies at work has multiple advantages such as increased efficiency and productivity, as well as improved flexibility. However, it also brings disadvantages that must be addressed and solved. In the framework of the collective agreement in the Energy business, ACCIONA undertakes to respect and ensure respect for the right to digital disconnection in the work environment, in accordance with current legislation.

Evolution of the rate of employee absenteeism by business line

Business	2019	2020	2021	2022
Energy	0.95	0.92	1.19	3.21
Infrastructures	5.30	5.28	3.00	3.88
Other businesses	1.86	2.28	6.03	7.61
Total	4.99	4.99	4.53	5.51

Absenteeism rate: (no. of days lost due to absenteeism/no. of days worked) x 100

The reorganisation of the Infrastructures and Other Business line explains the variation in the values compared to 2020.

Number of hours lost due to absenteeism

	2021		2022	
	Women	Men	Women	Men
Spain*	1,476,850	1,857,283	1,729,035	2,552,095

* The data is reported for Spain only. For future reports, we will work on giving a global data, finding a way to solve the difficulty of some countries not considering absenteeism as an employment index.

Absences due to accidents, maternity, common illness and COVID illness are taken into account. The figure is reported by hours in compliance with Law 11/2018. The system outside Spain compiles the figures in days. Given the number of agreements in force, the calculation of hours is only an estimate, establishing an average time of 8 hours/day.

Employee satisfaction and engagement

People's satisfaction and engagement are the key attributes of the relationship model that ACCIONA aspires to maintain with its employees through its PEOPLE strategy. The Engagement & Sustainability Global Barometer, globally carried out every year since 2021, allows us:

- To better understand what helps employees to be more productive to fulfil the company's strategy.
- To establish a specific metric system to follow up the evolution of the employees' commitment. To also analyse the correlations between the engagement and the 2025 SMP pillars and objectives and the PEOPLE strategy.
- To identify support measures based on a series of factors such as the following: knowledge of the critical transformation levers, satisfaction with SMP's key objectives, vision of the strength of the ACCIONA brand locally to attract talent, promotion of a work environment that values diversity and the perception of internal advancement towards an inclusive culture.

In the 2022 survey –based on the Kincentric methodology–, ACCIONA's global employee engagement rose to 68%, a five-point increase compared to 2019. Furthermore, participation increased by 56% in the amount of people answering the survey. Although a greater level of interaction usually implies more critical ratings, ACCIONA manages to keep a similar rating to previous years for its employees' engagement level.

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Evolution of employee turnover by gender, age and workplace (%)

	2019	2020	2021	2022
Turnover among men	3.43	6.36	14.62	15.27
Turnover among women	3.91	9.90	19.40	25.23
Turnover of people under 30	5.94	17.70	33.27	34.84
Turnover of people 30-50	4.07	6.23	14.66	16.71
Turnover of people over 50	3.57	5.02	7.87	10.37
Turnover in Spain	2.40	2.55	8.69	11.00
Turnover of people working outside Spain	5.49	13.50	24.72	25.52
Total turnover	7.05	12.92	16.04	18.22
Voluntary turnover*	3.57	7.56	12.41	16.69
Average hiring cost per employee	1,200	1,200	1,200	1,200

* Voluntary turnover = no. of voluntary departures of employees with indefinite contract / employees with indefinite contract.

Since January 2021, we take data managed through Workday, which allows us to incorporate a broader type of movements in people joining/leaving the company that reflect a more accurate picture of the employee turnover in the company.

Health and safety

Health and Safety			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> Higher operating costs 	<ul style="list-style-type: none"> Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> Higher operating costs Lower revenue 	<ul style="list-style-type: none"> Lower operating costs Revenue increase
	Important	<ul style="list-style-type: none"> Higher operating costs Loss of market share Higher raw material costs 	<ul style="list-style-type: none"> Lower operating costs Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> Bigger regulatory burden 	<ul style="list-style-type: none"> Positioning against a bigger regulatory burden
ACCIONA media: Important			

ACCIONA works in industries that are exposed to certain occupational dangers and this is why the company is committed to its employees' health, safety and well-being. This commitment is evident in its Human Resources and Occupational Risk Prevention Policy part of the Group's Policies Handbook. There is also a specific Health and Safety policy that is supported by the Quality Control and Environment Systems implemented in most business units.

The 2025 Sustainability Master Plan and the PEOPLE programme set out actions to comply with the company's commitments in terms of Occupational Risk Prevention, with the zero-accident target as a top priority. With this objective in mind, the company develops programmes that act on the organisational conduct to detect potential risks and prevent them, aiming to obtain the best results in health and safety.

100% of the workers participate in a programme aimed at preventing and correcting the root causes of the health and safety risks in the workplace. The goal is to create a safer and healthier work environment for employees and contractors. In the process, ACCIONA assesses the specific risks associated with its activities: linked to occupational illnesses, the performance of construction work, the use of machinery, working at heights, electrical contacts, etc.

The model implies the consolidation of a new prevention culture that materialises in specific initiatives that are also related to health and safety. In addition to this, a profound technological transformation that has generated a pioneer digital model in preventive management, that includes remote assistance in streaming form, IoT, virtual and augmented reality, as well as the development of predictive tools.

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Among the many advances in health and safety at work in 2022, some of the most relevant are:

- Development and implementation of a Health & Safety Management Smart Centre for projects and workplaces in the Infrastructures business and Other businesses.
- Digitalisation and improvement of the Critical Activity Planning programme in Infrastructure Projects.
- Development of the Health and Safety Training Point model in the learning process in Infrastructures and Other businesses.
- Promotion of the Drive Safe programme in the Energy area to manage road safety and raise awareness of it.
- Health and Wellness Programme:
 - Health management of the COVID pandemic among ACCIONA's workers.
 - Emotional management: Training and information given to workers through the Emotions 360º course.

Health & Safety Management Smart Centre



**Health & Safety
Smart Centre**

In 2022, the Infrastructures Division developed and set up the Health & Safety Smart Centre to support projects. It is based on a smart prevention model that incorporates new technologies for real-time management of health and safety matters all over the world. Smart data management, early risk detection and event prediction provides better decision-making abilities and conflict resolution.

The work sites are geolocated together with critical real-time alarms and warnings that are triggered by the different control models and checks on the working conditions, accidents, critical environmental situations, the performance of critical suppliers and lots more data.

The data tables, aside from a vast amount of information, offer different charts, accident rates, action and management plans, open non-conformities, comparisons, trends and different heat maps to follow up the concentration and evolution of different KPIs.

The smart centre will begin to manage the alarms and warnings in 2023 using intuitive markers to record all the incidents occurred and solve them.

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Health and safety training point



Infrastructures and Other businesses have developed a Health and Safety Training Point model. New technological resources have been added through digitalisation, including QR codes, courses using augmented reality and 360° scenarios to help with learning processes on:

- Induction
- Road safety
- Work teams
- Muscular-skeletal disorders

The programme gives access to the training activities and helps improve the quality of the contents. This was launched in 2022 in the international businesses to ultimately reduce the accident rate among the company's professionals.

Digitalisation and improvement of the Critical Activity Planning programme (SEIP)



The use of new technologies has meant that Infrastructures has been able to develop a digitalisation process for the programmes used to plan critical activities in 2022. The process was made easier by providing technical guides and graphic contents that are useful, intuitive, user-friendly and visual.

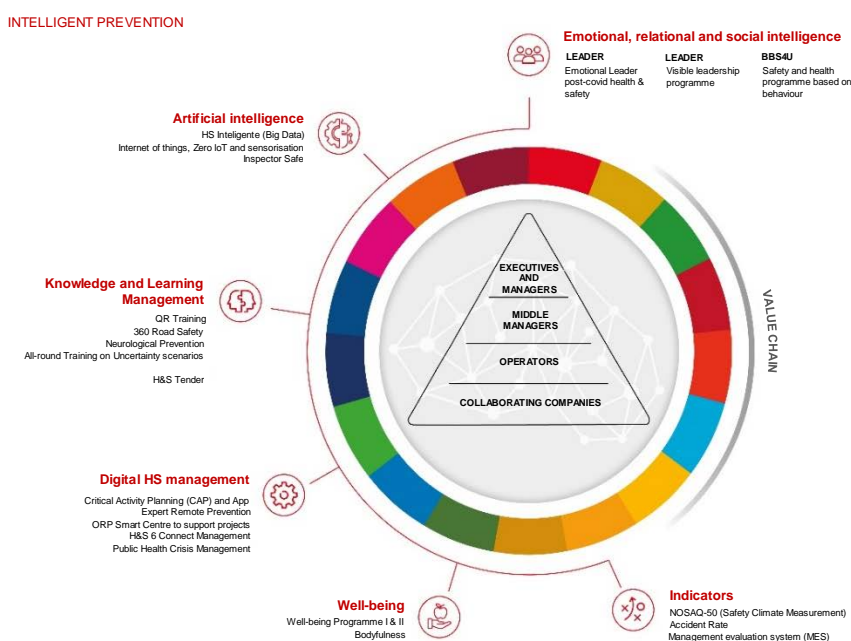
A series of tutorials guide the user through the tool functions, and the educational use of the audiovisual resources allows, by means of the smart variable, to set up plans through an interface that has been designed for that end.

All ACCIONA personnel must be familiar and comply with occupational health and safety standards, and look out for their own safety, that of other employees, clients, suppliers, collaborators and, in general, of all those who may be affected in the course of their activities.

In 2023, we will strive to boost people's well-being in the workplace by extending the courses on mental health and the launch of an international campaign on road safety and emotional health.

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Health and safety management in Infrastructures is based on the following model:



Evolution of the principal accident indicators

In 2022, there were a total 2,073.05 accidents among ACCIONA's own employees, which means a 12.07% drop in the frequency rate compared to 2021, thanks to the improvement of the health and safety policies and programmes in place. A total of 1,480.87 accidents involved men and 592.18 women, which equates to a frequency rate of 2.8 and 2.82, respectively.

Regarding the severity rate, this was 88.36 in the case of women and 96.30 for men, which means that the aggregate rate has fallen by 30% compared to 2021.

Evolution of accident indicators for the company's own employees

	Severity rate				Frequency rate			
	2019	2020	2021	2022	2019	2020	2021	2022
Energy	19	0.5	4.7	2.02	0.4	0.1	0.3	0.18
Infrastructures								
• Construction	63	25	33	34.72	1.9	1.3	1.1	1
• Concessions	191	146	124	215.18	6.5	6.2	3.7	4.48
• Water	153	134	111	81.45	3.7	3.9	3.5	2.52
• Other Infrastructure businesses	-	-	322	308.36	-	-	6.1	9.50
Other businesses	-	-	127	132.88	-	-	4.0	4.08

Frequency rate: (no. of lost time accidents/hours worked) x 200,000.

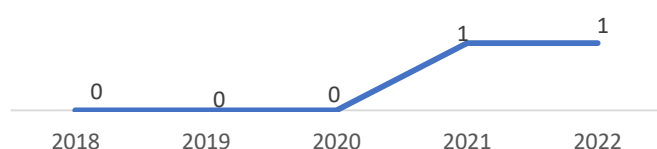
Severity rate: (no. of working days lost due to work accident/hours worked) x 200,000.

The business units "Other Infrastructure businesses" and "Other businesses" were reorganised in 2021. The previous years' data are not comparable.

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In 2022 there was a fatal accident: one of ACCIONA's employees fainted while working but it was not related to working conditions or behavioural factors. In ACCIONA's supply chain, there were five fatal accidents which happened in Australia, Philippines, United Kingdom and two in Spain.

Evolution of fatal accidents (own employees)



Road safety

At ACCIONA, the initiatives to promote road safety cover both accidents related to vehicular traffic (work-related mileage) and those occurring during travel to and from work (commuting). In 2022, work-related mileage accidents dropped by 1.85%, whereas commuting accidents rose by 2%.

Evolution of road accidents, with and without lost time, own employees

	2019	2020	2021	2022
Commuting accidents	318	235	249	254
Work-related mileage accidents	21	40	54	53

In 2022, ACCIONA kept its campaigns to raise awareness on this subject active on the company's intranet.

Drive Safe Programme

Since 2020, ACCIONA Energía has a road safety programme in place called Drive Safe, which aims to reduce road accidents by training drivers and improving vehicle equipment and the safety of premises.

Through this programme, the company has managed to reduce its employees' accident rate by 86%.

All in all, Drive Safe covers all the risk factors associated with the driver's preparation, the conditions of the environment and the technical requirements that must be met by the vehicles. The programme is built on three master lines of action: leadership, execution and control. Over 1,000 employees in ACCIONA Energía in Spain, Chile and Mexico have already benefitted from it.

The European Road Safety Charter, led by the European Commission, gives out the Excellence in Road Safety Awards in Brussels every year to recognise initiatives that help improve safety on the road in Europe. In 2022, ACCIONA Energía was awarded the Professional Drivers award for its Drive Safe programme.

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Prevention and healthy lifestyles

To evaluate the possible impact of occupational risks on the workers' health, employees are offered annual medical check-ups adapted to the specific risks they face. Depending on the results obtained, a decision is made as to the worker's suitability to perform the tasks inherent to his or her position.

ACCIONA also runs disease prevention and early detection campaigns. The company has carried on expanding the Health and Well-being Programme it began a decade ago to promote employees' all-round care. Our aim is in line with the ONE HEALTH concept promoted by WHO: optimum health for persons, animals and our planet.

The company is committed to preventive medicine and therefore runs:

1. Vaccination campaigns for flu, international trips, COVID.

In ACCIONA, the COVID-19 prevention measures have been key to keep the business running.

- About 25,000 vaccines were administered at the vaccination centre in its head offices in Alcobendas (Spain).
- The ongoing booster protocols have been adapted to the needs in each country.
- A total of 137,950 antigen/PCR tests were done.
- Over 10,300,000 masks were handed out to the company's professionals.

Recognition of ACCIONA's commitment and work in its strategy against COVID

The Regional Department for Public Health in Madrid has recognised ACCIONA for its vaccination strategy during the COVID-19 pandemic. The company joined the mass vaccination campaign helping to speed up the herd immunity process.

The manager of ACCIONA's Health and Safety Department received the award during the 8th Congress on Vaccine Updates held on 6 October 2022 at the assembly hall at the Ramón y Cajal University Hospital.

2. Raising awareness of the early detection of illnesses, such as the invitation to the conference What is Cancer? Know to Cure, held in Madrid by the Spanish Association against Cancer and given by Mr Carlos López-Ortín.

The programme revolves around the importance of a healthy diet, doing exercise and taking care of one's emotional health.

No. of occupational diseases (own employees)

	2021			2022		
	Women	Men	Total	Women	Men	Total
No. of diseases	0	5	5	9	10	19

The number of occupational illnesses has increased considerably. These diseases have been mainly found in workers from ACCIONA Facility Services, S.A.

There are also other activities in several divisions that may cause occupational diseases in very specific cases due to exposure to biological risk, overexertion, noise, silicosis and asbestosis. In all such situations, the necessary actions have been taken to eliminate or minimise the risk (training, awareness, protective equipment, etc.). Likewise, all workers exposed to risks of this kind are monitored.

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Stress at the work station

ACCIONA considers taking care of its employees' mental health as key to ensuring a pleasant environment and the well-being of all the persons making up the company. To do so, ACCIONA has assessments aimed at identifying possible risks related to work stress and carrying out activities and initiatives to fight against it. The company has a service of Occupational Health experts (ASPY) who specialise in work aspects and are directly connected to the organisation or the work. The service is open to all employees without limitation.

Through different initiatives, including the course on Emotions 360º and the workshops on occupational and emotional well-being, ACCIONA continues to raise awareness among its employees about work stress to teach more and more people about this issue.

Certifications

ACCIONA has certified 86.14% of its activity according to the international ISO 45001 standard to manage health and safety in the workplace. One of its plans for 2023 is securing the certificate for the ISO 45001 standard in the Airport Service in Germany, which would mean having this certificate for all the businesses and countries of ACCIONA Servicios. The extension of the certificate in ACCIONA Agua however has been shortened given the characteristics of some short projects that do not allow its certification for that very reason.

ISO 45001 certification by line of business

Business line	2020	2021	2022
Energy	100%	100%	100%
Infrastructures		91%	87%
> Construction	93%	98%	98%
> Concessions	90%	N/A	100%
> Water	100%	75%	54%
> Other Infrastructure businesses	-	85%	82%
Other businesses	-	79%	82%

Percentages calculated taking into account companies with more than 150 FTE. The business units "Other Infrastructure businesses" and "Other businesses" were reorganised in 2021. The previous years' data are not comparable.

Handling hazardous substances

Some of the activities carried out by ACCIONA's employees involve handling hazardous substances. In line with the Health and Safety Policy for its workers and in accordance with the current laws, the risks arising from handling hazardous substances are assessed. The workers have access to the safety sheets for each product and courses and information on the risks are given to the workers. Where necessary, we establish special action protocols in the event of exposure.

Employee participation

Workers' cooperation and communication in taking decisions is important for the company's continuity and benefit. ACCIONA's different business units have participation schemes that comply with local legal requirements –such as Health and Safety Committees– to channel worker consultation and collaboration in occupational risk prevention.

Some of the divisions also have emails or suggestion boxes where workers can ask questions, make suggestions and raise concerns about health and safety, aside from physical participation systems, notice boards and virtual talks through the Internal Communication department.

Personnel from collaborating companies also participate through business activity coordination committees created in all the work centres attended by the health and safety heads appointed by each represented company.

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Training and awareness-raising

All the company's businesses have training and awareness-raising programmes in their annual plan that include training actions in health and safety.

ACCIONA also has internal communication mechanisms that are key to preventing accidents and preserving the health and safety of employees. Among the most widely used tools are the intranet, newsletters, e-mail, suggestion box and messages via posters or payroll as well as specific actions in the workplace.

Training in occupational health and safety at the Corporate University (No. hours)

2019	2020	2021	2022
248,475	210,311	208,419	316,776

Extending the commitment to prevention to the supply chain

One of ACCIONA's main goals is to extend its culture and commitment to health and safety to the entire supply chain. In this regard, the company tracks the accident rates in its network of suppliers, contractors and subcontractors. Generally speaking, there is full participation in practically all prevention-related activities, collaborating in the procedures of the company's normal management systems (risk identification, definition of controls, inspections, training, information, safety programmes based on conduct, etc.).

The Infrastructures Division collaborates with the following stakeholders:

- **Companies collaborating with the follow-up of activities in projects and work centres:** risk identification, courses, inspections, accident rates, audits, meetings to coordinate activities, implementation of the voluntary protection programme and conduct-based safety programme. These include all the collaborating businesses that are hired for different projects and take part in the activities mentioned one way or another.
- **Workers' representatives:** ACCIONA participates in Health and Safety Committees .
- **Industry organisations and task forces:** SEOPAN, AGA, ASELIP, AECOM, ACEX, AGORA Bienestar.
- **Public and private institutions:** ACCIONA collaborates with regional and national authorities, work and social security inspection bodies and universities, all of them with jurisdiction over health and safety matters.
- **Clients:** knowledge of the management systems implemented in the contracts.
- **Road Congress in Seville:** introduction of the system to detect vehicle reach.

Evolution of accident indicators for contractors

	Severity rate				Frequency rate			
	2019	2020	2021	2022	2019	2020	2021	2022
Energy	24.4	7.7	9.3	14.84	0.8	0.7	0.7	0.50
Infrastructures								
▪ Construction	19.2	16.4	17.2	12.97	0.8	0.8	0.8	0.70
▪ Concessions	116.9	21.9	27.0	108.03	3.6	0.8	2.1	3.62
▪ Water	22.1	4.6	2.7	9.42	0.9	0.2	0.1	0.25
▪ Other Infrastructure businesses	-	-	219	318.36	-	-	9.7	10.39
Other businesses	-	-	15.3	11.06	-	-	1.9	1.43

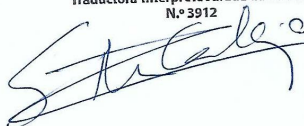
Severity rate: (No. of working days lost due to work accident/hours worked) x 200,000.

Severity rate: (No. of working days lost due to work accident/hours worked) x 200,000.

Frequency rate: (No. of lost time accidents/hours worked) x 200,000.

The business units "Other Infrastructure businesses" and "Other businesses" were reorganised in 2021. The previous years' data are not comparable.

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Joint frequency rate for employees and subcontractors

	2019	2020	2021	2022
Frequency rate	2.5	1.9	2.1	1.89
Severity rate	77	62	61	56.74

The frequency and severity rates dropped in 2022.

LEADERSHIP

ACCIONA promotes leadership models that boost technical excellence, where each employee can share the company's purpose so that the entire organisation is aligned to tackle the challenges and opportunities in sustainable development.

Managing knowledge

ACCIONA's people management model is based on the definition of roles as basic organisational units in which jobs that share a mission, responsibilities, knowledge and skills are grouped together. This model makes it possible to pinpoint the skills needed to achieve objectives and fulfil business strategies. The framework facilitates a standardised application of human resources policies, both in terms of recruitment and compensation, training and development.

In 2023, the company will launch several pilot schemes for experiences with virtual reality, augmented reality and mixed reality as well as projects aligned with ACCIONA Metaverse experiences.

Technical Leaders Programme and Network of Experts

ACCIONA has a Technical Leaders group comprising people who provide exceptional technical knowledge in key business areas. These professionals, who are capable of transforming this knowledge into a high-value technical skill, are recognised by the company, possess a global profile, and have published their own work in specialised media, or teach in different forums.

With more than 60 Technical Leaders and 320 experts, the main function of the programme is to ensure the transfer of knowledge and the application of more appropriate, efficient and innovative solutions for the projects carried out.

The main milestones this year were:

- Expanding the programme internationally.
- Boosting internal training with specific content platforms, like unlimited learning.

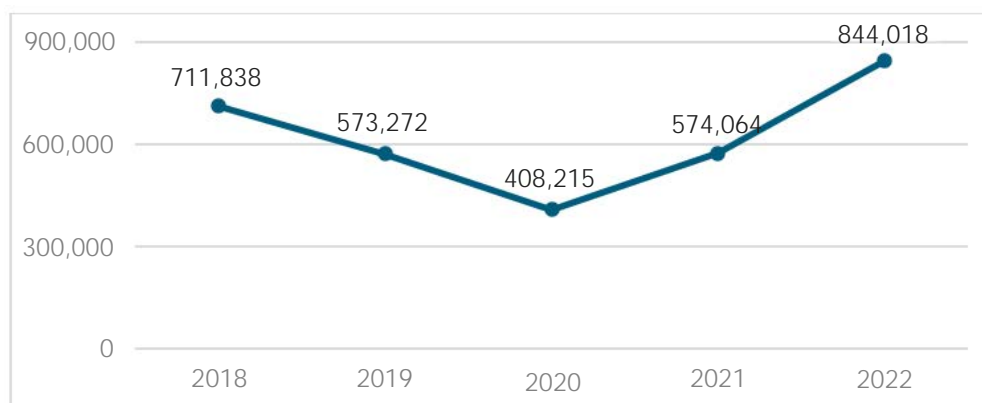
ACCIONA UNIVERSITY

The mission of ACCIONA's Corporate University is to ensure the training and ongoing development of the global workforce, depending on the business needs. It also relies on an effectiveness appraisal process.

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Evolution of the training received by employees (hours)



Investment in training (euros)

	Executives and managers	Technical staff	Support staff	Operators	Total
Total investment	3,829,210	4,271,611	168,362	4,052,526	12,321,710
Investment per employee/year	1,272.97	503.08	94.61	124.26	268.49

Evaluation levels

1 – REACTION	2 – LEARNING	3 – BEHAVIOUR	4 – RESULTS	5 – RETURN ON INVESTMENT
Equivalent to measuring the participants' satisfaction.	Determines whether knowledge and learning transfer has occurred.	Analyses changes in the job position of the person attending the training.	Evaluates the business results achieved through the training.	Return on the investment.
Evaluation questionnaire to be completed by the participant at the end of the course.	Test on evaluation of knowledge at the end of the training process.	Questionnaires to evaluate the effectiveness of the training.	Questionnaires to evaluate the effectiveness of the training.	Analysis of the impact of the training on selected business indicators.

Note: in 2022, evaluations were carried out at levels 1, 2 and 3.

The company's training programmes are continuously reviewed and adapted to the new needs of the company and its professionals. In 2022, we analysed the need for new contents in the different schools.

Business School

The Business School programmes have been turned into online and hybrid courses:

- **Executive MBA:** programme jointly designed by the School for Industrial Organisation (EOI) and ACCIONA to supply our managers with cross-section business tools. 32 ACCIONA professionals from different countries around the world attended this training initiative.
- **iGEP, International Global Executive Programme:** to share knowledge with internal and external experts and reflect the influence in our business and leadership, 23 executives began the 2nd edition of this programme created jointly with the IE Business School - Financial Times and ACCIONA.

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- **iSEP, International Skills Enhancement Program for Managers:** for all the managers working in ACCIONA, from all countries and businesses. This is a programme for the management team that was created jointly by the IE Business School - Financial Times and the academic committee of ACCIONA University. In 2022, over 400 managers took part in this programme, tackling the topics of digital transformation, macroeconomic environment, project management, Metaverse and reskilling as a driver of innovation.

Technical Skills

These training spaces were designed to improve productivity, technical excellence and the specialisation and internationalisation of ACCIONA professionals, guaranteeing a high level of qualification. Each itinerary contains specialities and sub-specialities. The training activities are planned as a structured teaching sequence.

- **IMPA, International Master in Project Administration:** In 2022, 16 students completed the global Master's Degree offered in collaboration with the Polytechnic University of Madrid. This post-graduate course focuses on developing our project managers with a view to consolidating their leadership role and providing tools to develop project management skills.
- **iXPA, International Specialisation Programme in Project Administration:** programme designed jointly with the Polytechnic University of Madrid (UPM) and ACCIONA to develop future Project Leaders, consolidating their leadership role and providing them with tools to develop project management skills. In 2022, 18 students from 6 countries did the programme.
- **iCAP, International Capabilities Acceleration Programme:** in collaboration with the ESADE business school and Minerva University, the programme aims to develop skills related to the Project Leaders Performance (PLP) Model. It speeds up the project management capabilities based on the PLP results. In 2022, 49 employees took the course.

Workday Learning and Online Libraries

Digital training to train non-managerial profiles in *soft skills* and technical competence. The aim of these initiatives is to supply all employees with the necessary tools to meet the demands of their current job and also promote their professional development.

Academies

The mission of the academies is to help employees develop key skills in technical areas and/or critical functions to improve performance. The academies teach a flexible model of structured and scalable learning through technical courses, bringing together hybrid models and new teaching methods that rely on the company's experts from all businesses and countries.

- **Planning Academy:** this is part of ACCIONA's Planning System. The purpose of this programme is to provide employees with key skills in the technical area of project planning, with an innovative planning method based on lean principles using the Last Planner System methodology.
- **Contract Management Academy:** its purpose is to professionalise the way the company manages contracts, sharing ACCIONA's know-how and strengthening a role that has become essential, especially in complex global projects. This academy helps build networks and synergies of professionals who are committed to ACCIONA's best practices and guidelines in this field.

A new Sustainability academy will be joining the existent academies in 2023.

ACCIONA's Institute of Technology

As a result of its commitment to continue producing and boosting its positive impact on society, ACCIONA has launched an action plan to identify, design, execute and scale learning solutions that will boost employability and improve the quality of life among different groups, especially those in risk of social exclusion, in every territory where ACCIONA operates.

ACCIONA wishes to contribute value and provide business units with the tools required to step up its actions with a social impact on the communities where the company deploys its projects. Along these lines, in 2022, the company taught 15,622 hours of courses to non-employees.

ACCESS TO RIGHTS

Employee coverage

At ACCIONA, practically all groups of employees are covered by the collective bargaining agreements in each country to protect their workers' rights.

As for the company's policies and commitments regarding social dialogue, every country where ACCIONA operates keeps an open dialogue between workers' representatives and the HR managers and/or work relations managers in each business and country. Also, each country and business has formally established channels to file complaints and claims, as well as communication channels with employees and HR managers in each business unit and workers' legal representatives without prejudice to the direct communication every worker can initiate with their contact person in the HR department.

Employees covered by collective bargaining agreements by country (%)

Collective agreements and/or conditions are signed for all building works and projects, except in those countries where union membership or representation is not a standard practice or is considered illegal. In such situations, mechanisms have been established to control the conditions agreed, applied both to the company and to its suppliers. ACCIONA holds ongoing and regular meetings with all trade union and employee associations to prevent any issues that could lead to conflict, thereby minimising the incidence of such scenarios.

In 2022, the company managed 349 agreements, 304 of which were in Spain, a figure that has increased compared to the previous year.




Employees covered by collective bargaining agreements by country (%)

Country	Employees covered by collective bargaining agreements
Spain	100%
Germany	100%
Australia	100%
Brazil	100%
Canada	100%
Chile	100%
United States	100%
Italy	100%
Mexico	100%
Norway	100%
Poland	100%
Portugal	100%
Qatar	0%
Ecuador	100%
United Arab Emirates	0%
Peru	100%
Rest of the world	99%
Total employees	100%

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Respect for human rights

Human Rights			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Critical	<ul style="list-style-type: none"> Lower revenue Bigger regulatory burden 	<ul style="list-style-type: none"> Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> Bigger regulatory burden 	<ul style="list-style-type: none"> Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> Lower asset valuation Higher operating costs 	<ul style="list-style-type: none"> Higher asset valuation Higher revenue Positioning against a bigger regulatory burden
ACCIONA media: Important			

The Principles of Action and of Ethical Conduct of the Code of Conduct set out the need to respect internationally acknowledged human rights in ACCIONA and anyone who is part of the company must perform their professional activities observing human rights and civil liberties.

Human Rights Policy

The Human Rights Policy, adopted by the Board of Directors and included in ACCIONA's Policies Handbook, shows the commitments and principles of responsible business conduct applicable to every Group company.

ACCIONA supports, respects, and contributes to the protection of internationally recognised fundamental human rights, making sure not to be complicit in any form of abuse or violation of those rights with regard to workers, suppliers, contractors, collaborators, partners, competitors, customers, local communities, and society in general.

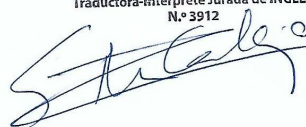
Therefore, it pledges to defend and monitor those rights in all the activities and in the geographical areas where it works and to also promote the adoption of these principles and values at the companies in which it may have shareholdings – even without a controlling interest– and also among its suppliers, contractors and collaborators.

ACCIONA respects and contributes to the protection of human rights pursuant to the International Human Rights Charter, the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work and its eight fundamental conventions; the Workers' Representatives Convention; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; the UN Convention on the Rights of the Child; the Principles of the UN Global Compact; the Seoul Declaration on Safety and Health at Work; and the UN Guiding Principles on Enterprises and Human Rights.

Principles of responsible business conduct of the company

- Fair, dignified and respectful treatment of people.
- Free work.
- Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence.
- Safe and healthy working conditions.
- Ethical, fair and equitable working and recruiting conditions.
- People's rights.
- Privacy and communications.
- Respect for the communities in which it operates.
- Development of skills.
- Sustainable contribution.

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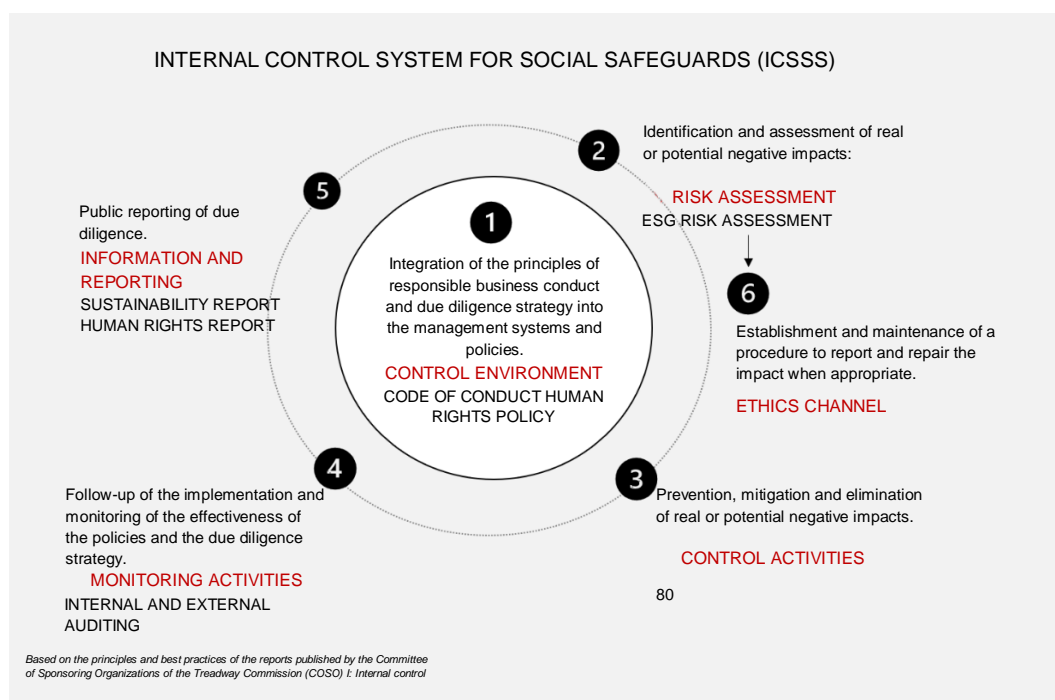


Due Diligence Strategy

ACCIONA agrees to identify, evaluate, prevent, mitigate, stop, supervise, communicate, post, deal with, remedy and report the real or potential adverse consequences of its activities and business relations on human rights through a due diligence process. The Human Rights Policy describes the company's due diligence strategy for a responsible business conduct.

Since 2021, ACCIONA has a procedure and an integrated social safeguard risk assessment and compliance management system in addition to a social safeguard auditing system.

ACCIONA has adopted and implemented an internal control system to prevent and mitigate real or potential effects on human rights. The Internal Control System for Social Safeguards (ICSSS) promotes and consolidates a true culture of compliance and respect of current legislation and reference international standards and principles on human rights.



Identification and assessment of real or potential impact risks

The detection of real or potential negative impacts on human rights is carried out on a yearly basis under the non-financial risk analysis.

The company maintains a regular and fluid dialogue with its stakeholders in this process. The risk assessment methodology combines an analysis of standard risk variables and indicators with consultations with the heads of the facilities showing the highest potential risk.

The social risk analysis includes the assessment of five social variables that, in turn, include twenty indicators related to human rights: discrimination in the workplace, freedom of opinion and expression, arbitrary arrest and detention, forced labour, modern slavery, human trafficking, child labour, young workers, freedom of association and collective bargaining, occupational health and safety, decent wages, decent working hours, informal workforce, right to privacy, minority rights, rights of women and girls, rights of indigenous peoples, land, property and housing rights, security forces and human rights.

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ACCIONA has identified five highlighted matters as priority action areas in accordance with the principles of responsible business conduct, which it is committed to observe, and with the company's ESG risk analysis.

Highlighted matters	Principles of the Human Rights Policy	Risk variables
Discrimination in the workplace	Fair, dignified and respectful treatment of people.	Discrimination in the workplace.
Fundamental rights and principles	Free work. Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence. People's rights. Respect for the communities and land rights.	Workers' fundamental rights and principles Forced labour. Modern slavery. Child labour. Freedom of opinion and expression. Arbitrary arrest and detention. Human trafficking. Young workers. Freedom of association and collective bargaining. Security forces and human rights. Minorities' fundamental rights and principles Minority rights Sexual minorities. Rights of women and girls. Communities' fundamental rights and principles Rights of indigenous peoples. Land, property and housing rights.
Health and safety conditions	Safe and healthy working conditions.	Occupational health and safety.
Working and recruitment conditions	Ethical, fair and equitable working and recruiting conditions.	Decent wages. Decent working hours. Informal workforce.
Right to privacy	Privacy and communications.	Right to privacy.

After analysing the risks at the facilities, in addition to a consultation process, the distribution of the risks inherent to the company's operations is as follows:

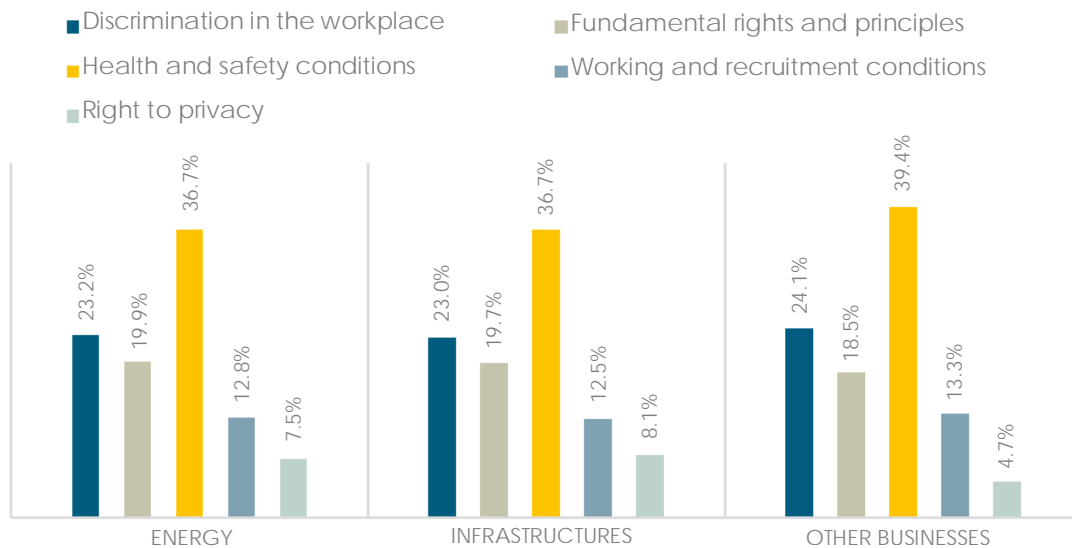
DISTRIBUTION OF RISKS BY HIGHLIGHTED MATTERS

Discrimination in the workplace	Fundamental rights and principles	Health and safety conditions	Working and recruitment conditions	Right to privacy
23.4%	19.4%	37.4%	12.8%	6.9%

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DISTRIBUTION OF RISKS OF HIGHLIGHTED MATTERS BY BUSINESS



Integration of the results of the impact assessments in internal processes

The Internal Control System for Social Safeguards (ICSSS) is executed at all levels in the company and consists of 80 control activities. The control activities are the actions resulting from the policies, standards and procedures to defend the principles that establish what is a responsible business conduct. Each risk event identified is associated to internal controls that prevent and mitigate the likelihood of a risk materialising.

The ICSSS documents these internal controls, along with a series of attributes characterising them, such as, the specific description of the control activity, the area or management unit in charge of performing them and the evidence that proves the appropriate execution of the control.

Internal audit

The Board of Directors delegates the monitoring of the performance of the ICSSS to the Audit and Sustainability Committee, which entrusts the Corporate Internal Audit Department with the monitoring of the operational effectiveness of the controls established to prevent and mitigate HR risks as part of the Group's internal control systems.

Every year, the Corporate Internal Auditing Department supervises the performance and effectiveness of the controls set by the Internal Control System for Social Safeguards. The supervision of the system is done through the corporate ACCIONA-RMS Risk Management application, where the persons in charge of the controls confirm the validity, design and effectiveness of the internal controls under their area of responsibility, as well as the suitability of their functioning. They must state any breach, partial breach or needs to adapt the control to the operating reality. Additionally, for a representative sample of controls, the person in charge will provide proof of their compliance.

Once the ICSSS internal monitoring procedures have been completed, reports are prepared reflecting the results, improvement recommendations and action plans proposed. The Corporate Internal Audit Department will report the scope and result of the monitoring performed on the ICSSS to the Audit and Sustainability Committee.

The updating of risks and controls is carried out annually by the Corporate Sustainability Department after the annual monitoring process performed by the Corporate Internal Audit Department.

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In 2022, it was concluded that the Internal Control System for Social Safeguards had been correctly implemented in the company. The areas of improvement detected were mostly related to workers' fundamental rights and principles and, in accordance with the action plan in force, the company proceeded to repair them.

External audit

In 2022, the monitoring process was completed with external on-site audits for social safeguards on five projects in total. The external audits assess the degree of compliance with the Human Rights Policy in the operations for certain projects.



The areas of improvement spotted in the audits were mostly related to workers' fundamental rights and principles. Moreover, the deployment of specific actions was recommended, including increasing access to whistleblowing channels and training workers on human rights. In 2023, the company will establish action plans for each of the areas of improvement spotted.

Follow-up of the effectiveness of measures and continuous improvement

Every year, ACCIONA reviews the internal processes for preventing and avoiding adverse consequences on the human rights of its stakeholders. Following the reports by the Corporate Internal Auditing Department and the recommendation reports by third parties, the company has proceeded to improve the due diligence measures.

Mechanisms for reporting and complaints

The Ethics Channel is the instrument used to ask any doubts or queries or to report any type of irregularities related to human rights. It is made available to everyone in ACCIONA, including its suppliers, clients and partners.

Where necessary, the company reports human rights violations to the Code of Conduct Committee and the appropriate judicial authority, cooperating with them as required.

Remedies

ACCIONA designs legitimate and effective mechanisms to remedy any negative impacts it may cause.

Reporting

Following the due diligence criteria, ACCIONA publicly reports, with transparency, any the serious violations occurred, as well as the actions put in place to curb the negative effects of the company's activities or those of its subsidiaries and trade partners. This reporting is done through the Statement of Non-Financial Information / Sustainability Report.

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Promotion and training

In 2022, the company run again a special Human Rights course in collaboration with the Spanish Global Compact Network and it was made available to the company's employees and suppliers. In 2022, 70 employees attended this course for 156.5 hours in total.

Human rights in the communities

Using its Social Impact Management (SIM) methodology, ACCIONA identifies, analyses and manages any real or potential violations of human rights committed through a specific project or service among local communities and other stakeholders.

The company studies the characteristics of the communities, including an analysis of the conditions in terms of human rights and other social aspects, and appraises these impacts. If any material impacts on human rights are identified, the SIM methodology requires the establishment of prevention and mitigation activities. The company also undertakes to develop or help devise remedies if risks materialise. The SIM methodology has been implemented in 253 projects in 28 countries.

The SIM methodology allows us to learn and manage the concerns and expectations surrounding ACCIONA on account of its operations by communicating and interacting with the communities. The company has different activities and communication channels to allow any stakeholders affected by a project to send their queries, complaints and suggestions.

This last year, the company intensified its focus on human rights in the audits on the management of the social impact, including specific audits on the procedures and processes in place to manage the human rights of workers, communities and the supply chain.

In 2022, ACCIONA worked on updating its Social Impact Management methodology with a view to aligning the management of the social impact caused by projects and services with the Internal Control System for Social Safeguards. From the very start of a project, the company conducts a thorough analysis and an assessment of the real or potential impacts on human rights with the appropriate budget. During the execution of the project, we keep track of the conditions of the workers, supply chain, communities and other stakeholders. If we spot any impacts materialising, we establish control activities to prevent and mitigate them.

Human rights and safety

ACCIONA undertakes to respect the Voluntary Principles on Safety and Human Rights and to act with diligence in both areas.

ACCIONA's non-financial risk analysis includes a risk variable related to safety and human rights which aims to detect real or potential negative impacts on human rights. Following the risk analysis, the appropriate mechanisms to control and mitigate risks are established.

The Internal Control System for Social Safeguards includes four control activities that have been specially designed to guarantee human rights related to the security personnel. These control activities include monitoring the alignment of the company's safety plans with the Voluntary Principles on Safety and Human Rights and training the security personnel on human rights.

Human rights in the supply chain

The Ethical Principles for Suppliers, Collaborators and Contractors lay down the principles of responsible business conduct aligned with the commitments undertaken by ACCIONA in its Human Rights Policy.

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Principles of responsible business conduct in the supply chain

- Respect for human rights as defined in the internationally recognised standards.
- Non-discrimination.
- Prohibition of Forced Labour.
- Prohibition of Child Labour.
- Respect for freedom of association, unionisation and collective bargaining.
- Fair labour practices.
- Adequate working conditions.
- Compliance with working hours.
- Promotion of diversity and inclusion.
- Respect for the communities in which it operates.
- Respect for the conditions of migrant workers.

ACCIONA strives to enforce due diligence in human rights matters in the supply chain through the following actions:

Identification and assessment of real or potential impact risks

The Risk Map is the main tool used to control and manage risks in the supply chain. The risk analysis is conducted before entering into the contract. Depending on the supplier's level of criticality, a series of control activities are defined in line with the outcome of the analysis.

The Map consists of eleven variables, including the "country risk" variable comprising several indexes extracted from Maplecroft and linked to various human rights factors: discrimination in the workplace, forced labour, modern slavery, human trafficking, child labour, freedom of association and collective bargaining, occupational health and safety, decent wages, decent working hours, rights of minorities and migrant workers.

In 2022, ACCIONA assessed 59,223 companies in terms of human rights through the Risk Map.

Integration of the results of the impact assessments in internal processes

ACCIONA establishes the following control activities to prevent and control the threat of real or potential risks materialising:

- 1. Responsible Supplier Statement:** every supplier working with ACCIONA must accept the Responsible Supplier Statement that includes their express agreement to comply with the Ethical Principles for Suppliers, Contractors and Collaborators.
- 2. Assessment and Certification Procedure:** In order to be awarded contracts of over €400,000, the interested companies must satisfactorily complete the procedure to assess and certify suppliers, contractors and collaborators working with the ACCIONA Group.
 - 2.1 Self-assessment questionnaire on Sustainability and Corporate Responsibility:** companies must fill in the self-assessment questionnaire on compliance with international standards. If the answer is unsatisfactory, this impacts the Risk Map, prevents supplier certification, and triggers the audit process under the Protocol for Audits on the Supply Chain.
 - 2.2 Protocol for Audits on the Supply Chain:** companies that show a high risk of violating human rights because of their country of origin must be audited before qualifying as a validated supplier. These suppliers are known as "MACS" (Mandatory to be Audited Critical Suppliers).
 - 2.3** Additionally, suppliers who are not deemed as MACS may also be audited due to their level of criticality, recurrence, a strategic decision or for other reasons. Audits imply on-site verification of compliance with internationally acknowledged human rights and with ACCIONA's policies, procedures and standards.

Welfare of migrant workers

Aware of the additional risk involved in hiring migrant workers, since 2015, ACCIONA relies on special control activities to guarantee their welfare.

The Standard for the Welfare of Migrant Workers establishes minimum compliance requirements that range from identifying the need to hire to ending the employment relationship with the migrant workers. The purpose of this standard is to ensure the supply chain is fully aligned with ACCIONA's policies on human rights. The Protocol for Audits on the Supply Chain includes special audits on the welfare, accommodation, observation of human rights and treatment of the workers in accordance with the minimum requirements established in the Standard for the Welfare of Migrant Workers.

As a result of the non-conformities spotted in 2021 under the Standard, in 2022 the company reinforced those activities, including:

- Reviewing and updating the Principles for Suppliers, Collaborators and Contractors and the inclusion of mandatory clauses to foresee a specific principle on respecting migrant workers' conditions.
- Establishing a Committee made up of the Sustainable Supply Chain Department and the Global Sustainability Department to deal with any non-conformities.
- Reinforcing due diligence for temporary employment agencies in the new methodology and SCRM platform (see SCRM: new model for supply chain risk and opportunity management that also includes ESG).

In 2022, Serious Non-Conformities (SNCs) related to the Standard were detected in 11 suppliers. Action plans were devised for all of them and four have already solved those SNCs. The rest are still in time to remedy them or will become No-Go suppliers.

3. **Internal Control System for Social Safeguards:** this system includes six control activities that have been specially designed to ensure that all due diligence actions described above are complied with under the company's standards, procedures and policies. The department in charge of this system and providing proof of the satisfactory execution of the controls is the Sustainable Supply Chain Department.

Elimination of real risks

ACCIONA works together with its suppliers to deal with any Serious Non-Conformities (SNCs) detected in the audits through action plans. In the event that the deficiencies detected cannot be solved within a reasonable period of time, the supplier acquires the No-Go status.

The No-Go Policies establish a series of minimum requirements and if these are not met, the company cannot be hired. The circumstances leading to a No-Go status include, among others, a proven breach of the United Nations Global Compact Principles, a proven breach of ACCIONA's minimum requirements on human rights, or any suppliers in a risk country considered for a contract above €400,000 who failed the audit.


Serious Non-Conformities (SNCs) in Human Rights

In 2022, ACCIONA conducted 170 audits on direct suppliers.

- 69% of these suppliers had no Serious Non-Conformities.
- The remaining 31% signed up for the various action plans. Of this percentage, 43% have fully resolved their SNCs and the rest are still in time to do so or have been marked as No-Go suppliers.

The highest number of SNCs were in health and safety, followed by workers' fundamental rights and principles.

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Follow-up of the effectiveness of measures and continuous improvement

In 2022, the new model for supply chain risk and opportunity management that also includes ESG was approved, strengthening the control activities related to human rights (see *SCRM: new model for supply chain risk and opportunity management that also includes ESG*).

Promotion and training

In 2022, the company launched again a special course on human rights for suppliers. In 2022, 7 employees attended 14 hours of this course.

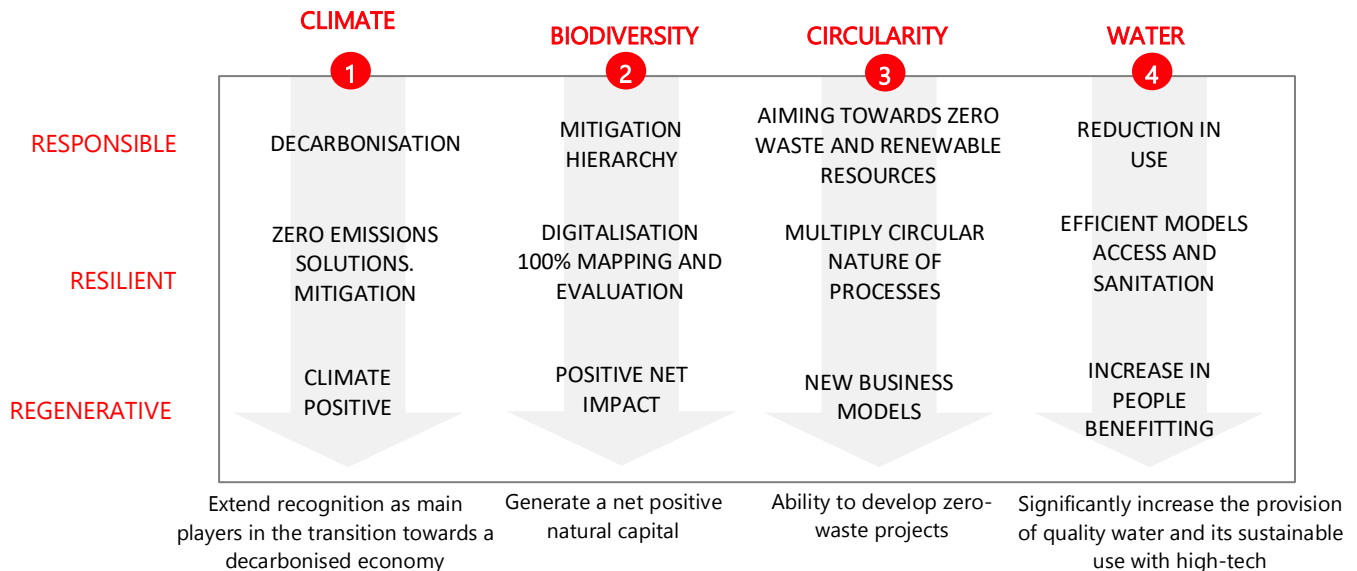
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Planet positive

Invest to regenerate the planet

ACCIONA projects pursue a positive impact on the planet, through business models based on decarbonisation, the conservation of water and ecosystems and the circular use of resources.



KEY MILESTONES 2022

- > Reduced GHG emissions by 36% (Scopes 1 and 2) and by 8% (Scope 3*) compared to 2017, in line with the 2030 SBT target of a 1.5°C reduction, and offset GHG emissions in its direct operations.
- > CapEx: 97.96% alignment with eligible figure.
- > First pilot phase implemented for the quantification of nature-related risks –TNFD.
- > 77% of the waste produced was sent to recovery and 9% of the resources consumed were from renewed or recycled sources.
- > Voluntary planting of an aggregate 223,753 trees (2021-2022).
- > Surface water, groundwater and municipal water consumption in water-stressed countries decreased by 12% compared to 2020.



MAIN CHALLENGES 2023





- > Reduce GHG emissions in line with the 2030 SBT target of a 1.5°C reduction and offset GHG emissions in its direct operations.
- > Invest 90% of the CapEx in sustainable activities according to the EU taxonomy.
- > Implement the analysis of nature-related risks in line with the TNFD guidelines.
- > Send 85% of waste produced to recovery.
- > Achieve 16% consumption of resources from a renewable or recycled source.
- > Reduce the use of surface water, groundwater and municipal water in water-stressed areas by 12% compared to 2020.

* Categories "Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Upstream transportation and distribution, Employee commuting and Use of products sold by the organisation" representing more than two thirds of the company's total Scope 3 emissions.





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CLIMATE

Mitigation of climate change

ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Critical	<ul style="list-style-type: none"> Bigger regulatory burden Lower asset valuation 	<ul style="list-style-type: none"> Revenue increase Higher asset valuation
	Significant	<ul style="list-style-type: none"> Lower revenue 	<ul style="list-style-type: none"> Lower operating costs
	Significant	<ul style="list-style-type: none"> Lower asset valuation 	<ul style="list-style-type: none"> Higher asset valuation
	Important	<ul style="list-style-type: none"> Lower asset valuation Higher operating costs 	<ul style="list-style-type: none"> Higher asset valuation
ACCIONA media: Significant			

Adaptation to climate change

ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Critical	<ul style="list-style-type: none"> Bigger regulatory burden 	<ul style="list-style-type: none"> Revenue increase Lower operating costs Higher asset valuation
	Significant	<ul style="list-style-type: none"> Lower asset valuation Higher operating costs 	<ul style="list-style-type: none"> Revenue increase Higher asset valuation
	Significant	<ul style="list-style-type: none"> Lower revenue 	<ul style="list-style-type: none"> Revenue increase
	Significant		
ACCIONA media: Significant			

ACCIONA offers sustainable infrastructure solutions and renewable energy projects worldwide. Its business strategy is aligned with the activities identified by the EU in its taxonomy as drivers of a decarbonised and sustainable economy.

The organisation fully shares the objectives of economy decarbonisation through public commitments, policies, specific procedures and objectives, and through an economic incentive model linked to achieving GHG emission reductions for executives, managers and technical and support staff.

ACCIONA's strategy against climate change is supervised and adopted by the Board of Directors through the Audit and Sustainability Committee. This is reviewed in line with the corporate standards on the management system, which prioritises becoming leaders in the transition to low-carbon business models.

ACCIONA's climate agenda is embodied in the objectives of the five-year Sustainability Master Plan (SMP), which gathers a series of initiatives and commitments managed by the General Financial and Sustainability Management and reported directly to the Audit and Sustainability Committee.

The main 2025 SMP goals on climate change are substantiated by:

- Following the pathway to reduce emissions generated by both the company and the supply chain over the 2017-2030 period, in line with the Science Based Target initiative (SBTi) of not allowing global temperature to rise above 1.5°C and becoming Net Zero Carbon by 2040 (Scopes 1 and 2; 2050 Scope 3).
- Aligning the investment strategy with activities to mitigate and adapt to climate change so that ACCIONA can classify 90% of its CapEx as fitting the EU taxonomy in relation to these two environmental targets.

The company's Climate Change Policy considers it a priority to lead the transition towards low-carbon business models which reduce or mitigate the negative impact of climate change. This includes adopting ambitious global targets in terms of reducing emissions and developing projects, products and services that contribute to reducing GHG emissions and facilitate access to renewable energy.

ACCIONA also encourages adapting to climate change through access to water and to resilient infrastructures under a series of specific principles. Some of the most remarkable ones are:

- Boost savings in energy consumption and improve energy efficiency, from R&D&i to all its products and services, including its supply chain too, with the aim of reducing GHG emissions.
- Foster the decarbonisation of the business model by buying renewable energy, optimising and reducing energy consumption and offsetting its emissions.
- Manage risks and opportunities associated with climate change in the short, medium and long term in order to take the necessary steps to ensure that its businesses can adapt to the expected physical and transitional changes.



More information: [Climate Change Policy](#)

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Climate-related impacts, risks, and opportunities

ACCIONA promotes the adoption of ambitious global targets to decarbonise the economy and includes them in its business model and in the Risk and Opportunity Management System in connection with climate change. Compliance is reported in accordance with the European Commission's climate reporting guidelines and the recommendations of the Financial Stability Board, through its Task Force on Climate-Related Financial Disclosures (TCFD).



More information: [Governance of sustainability and materiality](#) chapter in this report.

Climate-related risk and opportunity management

ACCIONA's management of climate risks is carried out through the application of a specific corporate procedure, which identifies, evaluates, prioritises and reports to the company's executive bodies the risks associated with climate change that might affect the group and its sites.

Based on this, we establish action policies and tolerance thresholds that will secure a reasonable achievement of the targets in the short term (1 year), medium term (5-year Sustainability Master Plans) and long term (10 years) according to the observation of mega trends and pre-set goals such as the Science Based Target initiative (SBTi).

In order to identify risks and opportunities, ACCIONA uses tools such as the digital climate change model that monitors climate variables –history and forecasts– in the different climate scenarios and over the different time periods foreseen in the latest reports by the Intergovernmental Panel on Climate Change (IPCC).

This instrument oversees the variables regarding production, finances, emission generation and energy consumption. It also includes references to the climate policies and the carbon markets in each region. Furthermore, we use other tools outside the digital model to identify legal requirements.

The expertise of the members of the assessment group appointed through the Global Sustainability Department, together with the business units, is essential in the analysis process and for the management of climate change risks. Using the tools mentioned above, the group proposes a series of climate risk scenarios for each centre, group of centres and/or business activities in the company (or its value chain), depending on their location, type of business activity and vulnerability, and these are quantified based on a series of key indicators.

The most common climate scenarios used to identify risk situations are those provided in the latest IPCC reports and those produced within the framework of the Network of Central Banks and Supervisors for Greening the Financial System (NGFS). From this last framework, ACCIONA primarily considers the Current Policies scenario (physical risks) and the NGFS Delayed Transition or Divergent Net Zero scenarios (transitional risks) to value its climate risks.

The climate risks with the greatest likelihood of occurrence and of a financial and/or reputational impact are considered material and involve the creation of special treatment sheets that will inform the company's decision-making bodies directly about the current situation and the options available to deal with the risk (mitigate, adapt, transfer or accept the risk and estimated cost).

Once the climate risk situations have been pinpointed and analysed, they become part of ACCIONA's general Risk Management System, where the tolerance threshold is determined based on the hierarchical structure introduced in the Governance section.

Strategy: Climate Risks and Opportunities

Every year, ACCIONA assesses the most significant climate risks and opportunities for the company. In 2022, these were identified considering their potential impact and timeline and their geographical range, by business and by the actions started to manage them.

Taking this into account, it is possible to assure that ACCIONA's business strategy is resilient to climate change, with a moderately low impact in terms of risk and a high impact in terms of opportunities.

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Climate risks

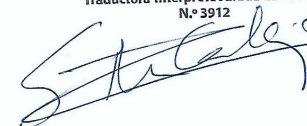
The climate-related risk assessment and management process in 2022 materialised in the assessment of 136 risk situations for all of ACCIONA's businesses. Some of the most important ones are:

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No.	Business	Main countries	NGFS scenario / Timeline	Category	Subcategory	Description	Likelihood of occurrence	Financial impact	Risk management
1	All of ACCIONA's businesses	Those where ACCIONA operates	ACCIONA's own scenario. Assessed for 2025	Transitional risk	Reputational. Policy and lawfulness.	Increase of capital costs, decrease in liquidity and/or increase in operating costs due to low opinion from the public in general and the investors in particular on the organisation's performance regarding its decarbonisation target due to failing to meet the target in the company.	Unlikely	Minor [1-2% of the financial result]	ACCIONA allocates a specific budget to execute emission reduction projects in the company. It is constantly tracking the risk of deviations from its target and proposing solutions. The vast majority of ACCIONA's power consumption now comes from renewable sources. The company follows certain procedures to detect risks related to failing to meet its decarbonisation target right from the bidding stage. It passes on to the budget of each project within the 90% of the highest emission range, an expense related to the project decarbonisation.
2	Construction	Spain, Mexico, Philippines, Panama, Chile, Peru, USA, Norway, Portugal and Poland	Current Policies scenario. Assessed for 2030	Physical risk	Severe	Increase in the division's expense of executing the works due to the need to protect and/or repair damages caused by a higher frequency of certain weather events such as floods, storms, etc.	Likely	Insignificant [<1% of the financial result]	ACCIONA's geographical diversification of its construction work mitigates the impact of this risk. Total or partial transfer of the risk to the client by reviewing, including or improving the contract clauses before signing it, in terms of possibly extending the deadline/expense due to adverse weather that, should it become extreme, may be considered as "force majeure" with the appropriate compensation for the contractor. Taking out insurance policies with better coverage to pass risks on to the insurance companies.
3	Construction Oceania	Australia and New Zealand	Delayed Transition scenario. Assessed for 2030	Transitional risk	Market	Increase in the operating cost as a result of introducing a price/tax on the carbon produced by the diesel fleet and directly linked to ACCIONA Oceania's carbon footprint.	Possible	Insignificant [<1% of the financial result]	In addition to the measures listed under Risk 1, the risk is managed through: The option of commitments to use renewable power in new tenders to reduce or eliminate Scope 2 emissions and/or offset them by using LGCs. Implementation of measures to maximise efficiency through LEAN assessments and management plans for Linked Site fleets. Transition to hybrid/electric vehicles, alternative fuels and/or new technologies in new installations and equipment.
4	Energy	Spain	Current Policies scenario. Assessed for 2030	Physical risk	Chronic	Decrease in the production of electricity by hydroelectric stations in Spain due to less water runoff and a lower optimisation of the production due to the seasonal changes.	Likely	Insignificant [<1% of the financial result]	ACCIONA's geographical diversification of its energy activity mitigates the impact of this risk. Managing reservoirs with weather forecasting to enable better planning and management of the reservoirs. Establishment of monitoring and control tools for potential changes in seasonality and production.
5	Water	Mexico, Australia, Saudi Arabia, Algeria, Egypt, Panama	Delayed Transition scenario. Assessed for 2030	Transitional risk	Market	Higher operating costs due to regulatory changes that demand lower GHG emissions in water harvesting, treatment and/or distribution.	Unlikely	Insignificant [<1% of the financial result]	Implementation of operational improvements in the operated centres (equipment renewal, process improvements, etc.). Inclusion of criteria to assess the efficiency of high-impact equipment and improvement of power monitoring and management with the Business Intelligence tool and management platforms. ACCIONA's geographical diversification of its activity mitigates the impact of this risk.
6	Energy	All countries where it operates	Current Policies scenario. Assessed for 2030	Physical risk	Chronic	Revenue decrease due to less wind or sun needed to produce electricity due to seasonal changes.	Unlikely	Insignificant [<1% of the financial result]	ACCIONA's geographical diversification of its energy activity mitigates the impact of this risk.
7	Energy	All countries where it operates	Current Policies scenario. Assessed for 2030	Physical risk	Chronic	Reduction of power production due to damages to infrastructures caused by more extreme weather events.	Unlikely	Insignificant [<1% of the financial result]	There are many adjustment measures in place. E.g.: Raising substations in active power stations to limit the damages caused by extreme weather events, such as floods. Taking out insurance against risks resulting from extreme weather events.

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Monitoring the climate change risk in the company's construction projects

Since 2018, the company's construction projects have relied on a tool that regularly tracks risks and opportunities through balanced scorecards that include climate change aspects.

This tool makes it easier to manage the risks in each project. Firstly, describing the risks and establishing the level of interconnection between each other and, secondly, showing the variation of the residual risks (resulting from applying mitigation measures) over time until the work is completed.

Additionally, this tool allows the incorporation of a BIM methodology to integrate risk and opportunity management in the model. It also enables the deployment of important collaborative work with the participation of the project teams and the support areas regardless of where they are.

So far, this tool has been used on 31 projects with more than 250 users who have identified and analysed over 3,300 risks. The data in the tool is integrated into the Business Intelligence (BI) apps used by ACCIONA to help improve its global performance.

Key climate opportunities

The opportunities identified are added to the company's core business, focused on developing activities that will help mitigate and adapt to climate change. These are the most important ones in ACCIONA, identified by business and territory:

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No.	Business	Main countries	NGFS scenario	Category	Description	Type of impact	Opportunity management
1	Energy	USA, Mexico, Chile, Spain, Australia, etc.	<i>Delayed Transition // Divergent Net Zero</i>	Products and services	Higher demand for renewable technologies due to amendments to climate change regulations.	Increase in sales (very high)	Commitment to invest in renewable energies at least €7.800M in installed capacity for the 2021-2025 period, by the end of which, ACCIONA intends to operate more than 20 GW of renewable energy. The newly installed MW will mean a revenue increase. This strategy will carry on growing beyond 2025, with a target of installed capacity of >30 GW in 2030.
2	Infrastructures	Saudi Arabia, Egypt, UAE, Algeria, Qatar.	<i>Current Policies</i>	Products and services	Increase in the demand for water treatment infrastructures in regions where greater shortages are predicted because of climate change.	Increase in sales (high)	Structuring of the water treatment infrastructure portfolio with notable presence in the countries identified, where more than half of the economic activity is generated at present. This opportunity translated into a 30% increase in annual sales in 2022 compared to 2020.
3	Infrastructures	Brazil, UAE, Norway, Ecuador, Australia, Spain, etc.	<i>Delayed Transition // Divergent Net Zero</i>	Products and services	Increase in the demand for low carbon transport infrastructure because of the expected mobilisation of capital for investment in sustainable activities aligned with the EU taxonomy requirements.	Access to financing (high)	Structuring of the public transport infrastructure projects portfolio with greater weight for projects aligned with the opportunity detected. The taxonomy-compliant turnover for low-carbon infrastructure has increased by 50% compared to 2021.
4	Mobility	Spain	<i>Divergent Net Zero</i>	Markets	Higher demand for shared electric mobility services due to consumers' greater awareness of climate change and tighter restrictions on other types of vehicles.	Increase in sales (medium)	Gradual expansion of the shared motorbike fleet in volume and number of cities. This business has grown by 34% its EU taxonomy-compliant turnover compared to 2021.
5	Energy	Spain, Mexico	<i>Divergent Net Zero</i>	Markets	Higher demand for energy services by industrial and municipal clients.	Increase in sales (medium)	Investment in innovation for energy solutions in client facilities. Expansion of the service to new locations and countries. Compared to 2021, this opportunity meant a 327% increase in the taxonomy-compliant turnover for this business in 2022.
6	Energy	Spain	<i>Divergent Net Zero</i>	Products and services	Industrial and municipal clients demand new charging points for electric cars.	Increase in sales (medium)	Gradual expansion of the Cargacoches business presence. This business has meant an increase of over 560% in the EU taxonomy-aligned turnover compared to 2021.



More information. *Risks and Opportunities Report related to Climate Change*, aligned with the TFCO recommendations.

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Climate targets

Net Zero Target

ACCIONA's ambitious low-emission commitments have been approved by the global Science Based Targets initiative (SBTi).

The company's pathway for the reduction of direct emissions (Scope 1) and those derived from energy consumption (Scope 2 –market-based) is set at 60% for 2030 in absolute terms compared to the 2017 data. The pathway for the reduction of Scope 3³ emissions is set at 47% for 2030 in absolute terms compared to the 2017 data. According to the GHG Protocol methodology, ACCIONA does not use any type of offsetting to meet its emission reduction targets.

In 2022, the yearly target set for the reduction of emissions was 23.07% for Scope 1 and Scope 2 (market-based) emissions and 18.08% for Scope 3 emissions.

ACCIONA signed The Climate Pledge (TCP) in 2021 and reinforced its Net Zero commitment in 2022, intending to reach Net Zero by 2040 for Scope 1 and 2 (market-based) emissions and by 2050 for its Scope 3 emissions.

The commitment to reach full decarbonisation in its operations translates into a reduction of Scope 1, 2 and 3 emissions by 90% compared to 2017 and into absorbing residual emissions generated by means of nature-based solutions.

EU taxonomy alignment goals for sustainable activities.

As a goal, ACCIONA intends to align its investment strategy with activities to mitigate and adapt to climate change in such a way that the company can classify 90% of its eligible CapEx as EU taxonomy-compliant.

Main taxonomy figures

ACCIONA's sustainable activities are considerably aligned with the EU taxonomy requirements and are especially focussed on mitigating and adapting to climate change, whether this is in the area of renewable energy, construction, water management, transport, housing, or any of its other technical capacities.

The proportion of eligible economic activities according to the taxonomy in 2022 was:

- Turnover: 51.11% eligible.
- OpEx: 63.28% eligible.
- CapEx: 86.29% eligible.

On the other hand, the percentage of taxonomy-alignment out of the eligible figure of ACCIONA's activities in 2022 is as follows:

- Turnover: 77.46% alignment with eligible figure.
- OpEx: 89.23% alignment with eligible figure.
- CapEx: 97.96% alignment with eligible figure.

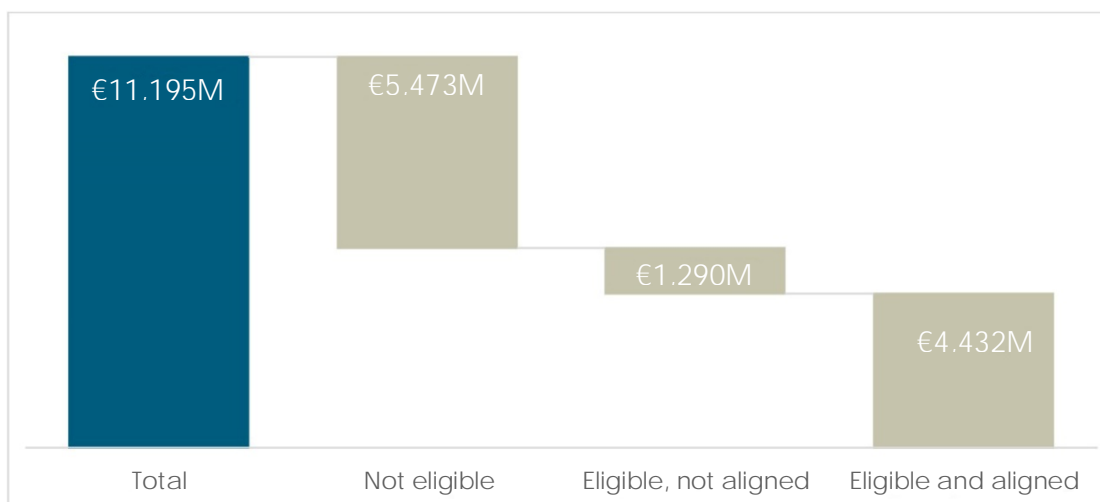


More information. The methodology for the estimate and breakdown of data according to Annex II of Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, is contained in the Annexes section.

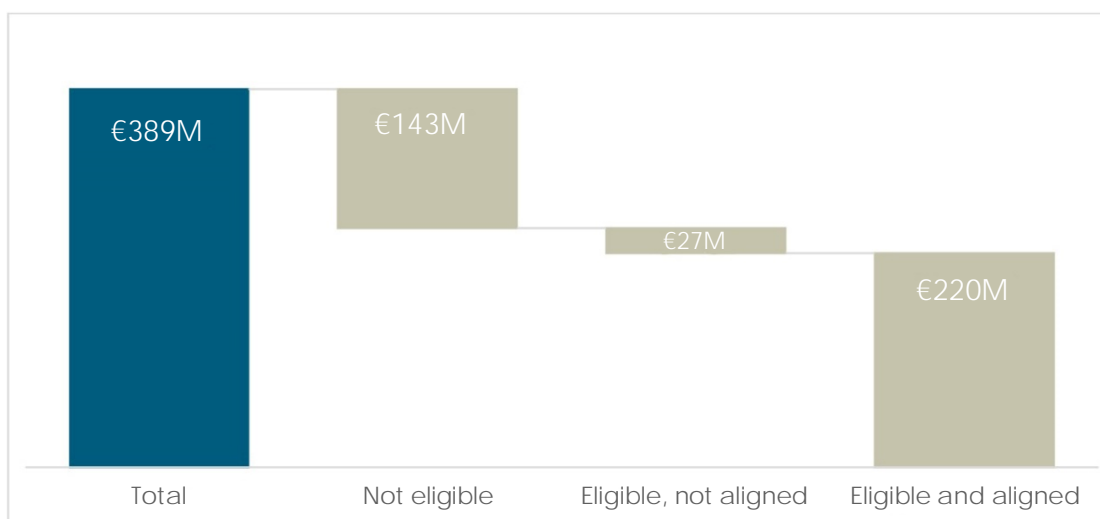
The following graphs schematically show the results of eligibility and alignment of ACCIONA's activities with the taxonomy. For the absolute figures of OpEx and CapEx below, the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account. This is why they may differ from the figures shown under the same heading in the company's financial statements.

³ Categories: "Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Upstream transportation and distribution, Employee commuting and Use of products sold by the organisation" representing more than two thirds of the company's total Scope 3 emissions

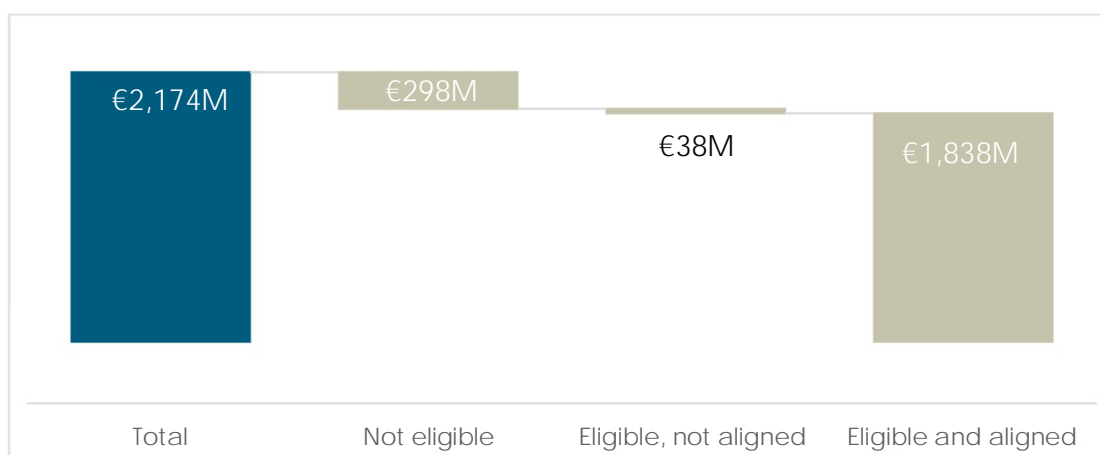
EU taxonomy-aligned turnover (€M)



EU taxonomy-aligned OpEx (€M)



EU taxonomy-aligned CapEx* (€M)





More information. See the [Annexes](#) section below.

Internal carbon price

The setting of an internal price for carbon establishes incentives to fulfil ACCIONA's decarbonisation commitment and shift its production and consumption model towards a specific scenario by 2040. In ACCIONA, this price produces a real cost on businesses depending on their greenhouse gas emissions. The revenue arising from those associated costs are used in decarbonisation projects in and out of the company.

In 2022, ACCIONA updated its Guide to Apply the Internal Carbon Price that includes the following main actions:

- **From business to project:** establishment of a low-emission target for each business in the company and for the group's facilities that make up 90% of the company's total emissions.
- **Land price:** mandatory preparation of a carbon budget for all facilities making up the group above. This budget is calculated based on a set internal rate €7.5/tCO₂e, that acts as a shadow price.
- **Settlement price based on target compliance:** settlement per business of the emissions generated at a variable rate between €7.5/tCO₂e and €190/tCO₂e depending on compliance or non-compliance with the targets established to contribute to the company's decarbonisation fund.

Decarbonisation fund

Since 2016, ACCIONA has had a fund and the budget of this fund comes from charging the internal price of carbon in its activities. The fund is used to acquire carbon credit to offset the emissions generated from its direct action, but since 2020 it has also been used to invest in projects to reduce its carbon footprint. In 2022, the fund amounted to €1.3M.

The funding of decarbonisation initiatives through the fund is awarded by means of an internal bidding mechanism. Firstly, a selection committee decides which proposals are a priority according to their impact and return, until lastly, a committee comprising members of senior management determines the allocation of funds to the projects with highest potential.

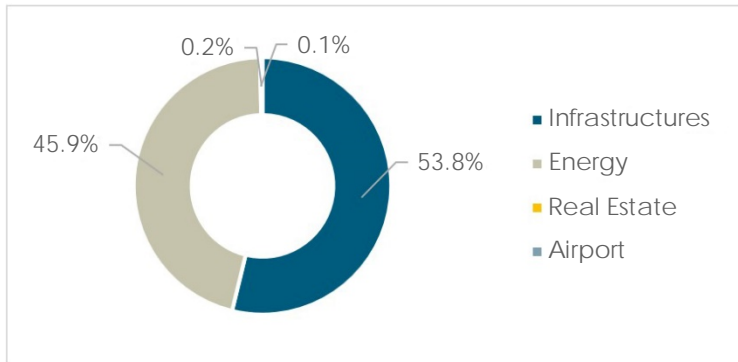
In 2022, a total of 17 initiatives were financed by the decarbonisation fund, with a potential to reduce emissions by about 16,000 tCO₂e and a development period of more than a year for some projects.

These are some of the projects coordinated based on the decarbonisation fund:

- Pilot project to enrich biogas with green hydrogen produced by the anaerobic digestion of wastewater treatment sludge.
- Analysis of technical viability of the use of concrete substitutes with low CO₂ emissions at the building site.
- Pilot project to implement a geolocation tool for ground support equipment (GSE) in airport operations.
- Development and testing of an integrated balanced scorecard to monitor and manage electricity and fuel consumption at the building site.
- Electrification of equipment of the machinery fleet.
- Building a brine concentration pilot plant implementing a process that is more energy-efficient.
- Pilot project to install green H₂/NH₃ portable power generator sets.
- Pilot project to reduce CH₄ and N₂O emissions in biomass combustion plants by continuously monitoring the levels of combustion and the adjustment of associated parameters.

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Emissions reduced through the fund by division (%)



GHG emissions. Scope 1, 2, 3 and total emissions

GHG emissions

GHG emissions are calculated according to the criteria defined in the GHG Protocol, under the financial control scheme, consolidating as CO₂ equivalent emissions corresponding to all the GHGs that are relevant for the company: CO₂, CH₄, N₂O, HFC and SF₆. The criteria for the consolidation of energy consumption and other emissions follow the same accounting criteria.

The conversion factors used are those indicated by these initiatives:

- Intergovernmental Panel on Climate Change (IPCC), in the 2006 IPCC Directives for GHG inventories.
- National Inventory of Greenhouse Gases (GHG) of Spain.
- International Energy Agency.
- Red Eléctrica de España (the Spanish grid operator).
- ACCIONA Green Energy.
- The UK Department for Environment, Food and Rural Affairs.
- The European Environment Agency.

Scopes 1 & 2

In 2022, ACCIONA's Scope 1 emissions were 159,652 tCO₂e and its Scope 2 market-based emissions were 7,520 tCO₂e. The total Scope 1 & 2 emissions were 36% less than in 2017, which means that the company is on track for its decarbonisation pathway and for its science-based target for 2030. On the other hand, its Scope 2 location-based emissions were 139,733 tCO₂e.

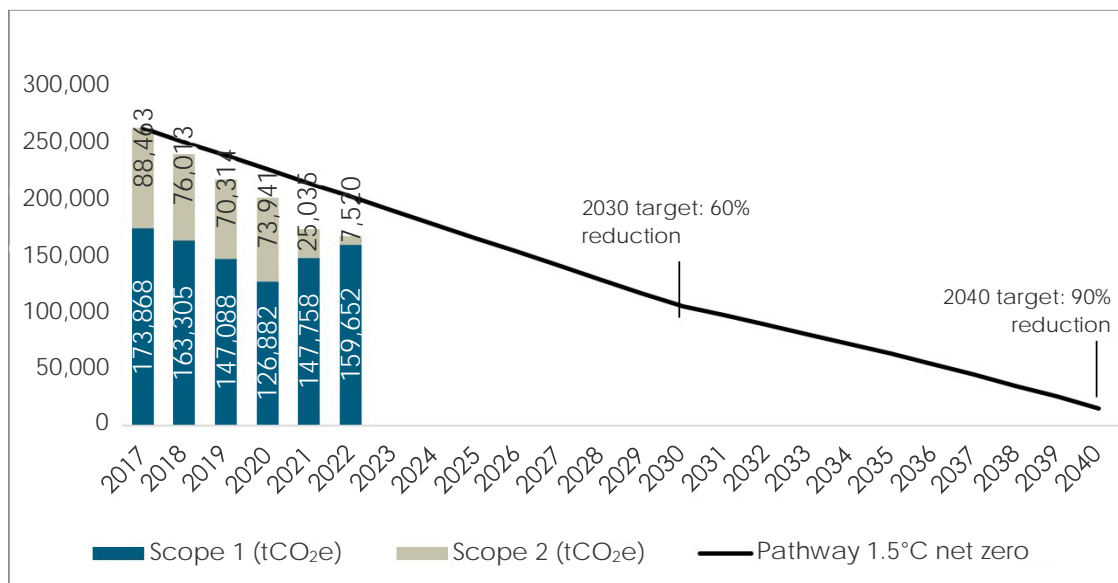
The intensity of the Scope 1 & 2 emissions was 14.9 tCO₂e/sales in 2022.

In 2022, biogenic emissions amounted to 482,890 tCO₂e as a result of the biofuel combustion.

None of ACCIONA's operations are subject to schemes that foresee the use of emission rights.

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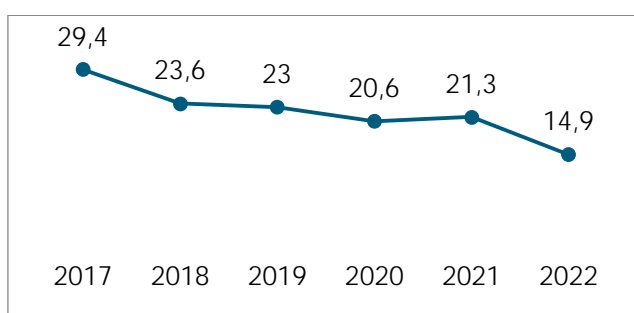
Evolution of Scope 1 & 2 emissions generated (tCO₂e)



In 2022, the emissions of the 2017 base year were re-calculated due to a structural change in the company's scope of consolidation in accordance with the GHG Protocol. Therefore, the past emissions have been re-calculated too. This update was taken into account when reviewing the SBTi target. The emissions of the base year are 262,332, where 173,868 are Scope 1 and 88,463 are Scope 2 (market-based, figures calculated with decimals and rounded off).

As for the 2021 data, the GHG emissions have dropped considerably due to a dramatic fall in Scope 2 emissions that makes up for the slight rise in Scope 1 emissions. This drop in Scope 2 emissions was thanks to acquiring power from renewable sources.

Intensity of Scope 1 & 2 GHG emissions (tCO₂/sales)



Scope 3

In 2022, ACCIONA set a science-based target to reduce Scope 3 GHG emissions by 18.08% compared to base year 2017 for the following set of categories: Products, services and raw materials; Capital goods; Activity related to energy use (not Scope 1 or Scope 2) and Upstream transport and distribution, employee commuting and use of products sold by the organisation.

The Scope 3 emissions for these six categories have decreased by 8.44% compared to 2017 (2017 data: 1,995,590 tCO₂e), while the aggregate Scope 3 emissions rose by 8%, mostly due to a greater generation of emissions in assets leased to the organisation.

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As for last year, its Scope 3 emissions rose given the increase in purchases as the company's operations grew. However in 2022, the company continued to implement measures to reduce Scope 3 emissions: use of life cycle analysis tools in project design, inclusion of the risk of climate change (MA/CO₂ variables) in the supplier risk map⁴ and sustainability training courses available to suppliers.

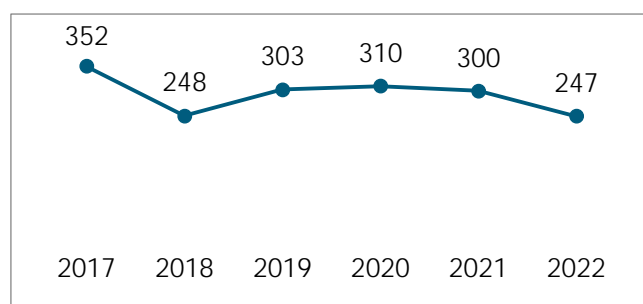
Scope 3 emissions in relevant categories for ACCIONA (tCO₂ e)

Category	2017	2018	2019	2020	2021	2022
Products, services and raw materials	947,033	764,918	948,031	993,471	945,462	1,005,761
Capital goods	630,764	299,156	400,978	255,640	338,729	522,997
Activity related to energy consumption (not Scope 1 or Scope 2)	147,461	25,109	26,626	23,375	16,210	75,272
Upstream transportation and distribution	203,034	48,443	37,179	27,976	35,312	120,934
Waste generated in operations	14,861	10,451	3,764	6,189	8,234	9,641
Business travels	17,190	17,785	14,336	3,973	6,153	10,592
Employee commuting	55,568	61,957	61,487	60,198	65,009	64,188
Assets leased to the organisation	486,985	557,942	649,565	589,267	962,694	823,312
Use of products sold by the organisation	11,730	57,252	18,347	25,658	31,768	38,009
Waste from products sold by the organisation	144	191	155	161	91	107
Investments	39,040	19,346	26,775	29,804	27,022	94,076
Total (tCO₂e)	2,553,810	1,862,551	2,187,243	2,015,714	2,436,684	2,764,889

The headings "Downstream transportation and distribution", "Processing of sold products", "Assets leased to the organisation" and "Franchises" are considered irrelevant for ACCIONA because these activities are not carried out or their emissions are now included in Scopes 1 and 2 or in another Scope 3 category.

The Use of products sold by the organisation category has been re-calculated for previous years in order to include the Silence motorbike sales.

Intensity of Scope 3 GHG emissions (tCO₂/sales)



⁴ More information in the chapter Exponential leadership-Supply chain

Other emissions generated

Global emissions of NO_x in 2022 were 2,542 tonnes, SO_x 198 tonnes, PM₁₀ 111 tonnes and SF₆ 0.024 tonnes.

The company set as target to reduce this type of emissions by 2.5% compared to the 2017 figures (discounting activities no longer attributable to ACCIONA). The target was met for SF₆.

Evolution of other emissions (t)

	2017	2018	2019	2020	2021	2022
NO _x	14,683	1,767	1,673	1,539	2,040	2,542
SO _x	3,351	248	193	141	135	198
PM ₁₀	958	76	74	51	77	111
SF ₆	0.094	0.050	0.059	0.055	0.032	0.024

The 2018 data for NO_x include activities that are no longer attributable to the company. Discounting these activities, the figures would be: 1,762 tonnes.

Discounting the activities that are no longer attributed to ACCIONA, the 2017 figures are (NO_x: 1,797t; SO_x: 185t; PM₁₀: 79t; SF₆: 0,094t).

Climate-change indicators

Own energy consumption

In 2022, ACCIONA consumed 2,432,669 MWh of energy, 79.89% of which came from renewable sources.

The company's GHG emission reduction goal (reduce by 23.07% compared to 2017) intrinsically implies a non-renewable energy reduction target. This goal was attained in the same sense as the Scope 1 & 2 emission targets.

Energy consumption and mix (MWh)

	2017	2018	2019	2020	2021	2022
Renewable	1,594,417	1,582,844	1,508,909	1,517,395	1,843,960	1,784,884
Biomass	1,189,752	1,220,269	1,179,469	1,249,749	1,271,356	1,287,921
Biogas	27,920	87,134	102,484	2,200	2,217	29,642
Bioethanol	0	0	0	0	0	1,626
Biodiesel	187	1,621	1,627	10,099	3,757	15,676
Hydrogen	-	-	-	-	-	14
Total renewable fuels	1,217,859	1,309,024	1,283,580	1,262,048	1,277,330	1,334,879
Electricity	376,558	273,819	225,329	255,347	566,630	450,005
Non-renewable	3,703,120	1,246,577	559,234	505,682	630,333	647,785
Diesel	2,328,900	406,516	384,702	294,627	481,586	535,693
Fuel oil	5,281	9	1,317	3,779	0	1,913
Natural gas	79,388	43,923	39,293	26,485	42,716	40,235
Petrol	23,003	19,516	25,648	25,941	31,448	26,967
Propane	4,324	23	41	14	27	11
LPG	0	0	0	0	2,939	827
Total non-renewable fuels	2,440,896	469,987	451,001	350,846	558,716	605,646

Electricity	1,262,224	776,589	108,233	154,836	71,617	41,750
District Heating	-	-	-	-	-	389
Total (MWh)	5,297,537	2,829,421	2,068,143	2,023,077	2,474,293	2,432,669

The 2017 and 2018 figures include activities that are no longer attributable to the company. Discounting these activities, the figures would be:

- Renewable 1,562,568 (2017) and 1,521,103 (2018)
- Renewable electricity 344,709 (2017) and 212,079 (2018)
- Non-renewable 727,538 (2017) and 599,270 (2018)
- Non-renewable fuels 528,401 (2017) and 445,529 (2018)
- Non-renewable electricity 199,137 (2017) and 153,741 (2018)
- Total 2,290,105 (2017) and 2,120,373 (2018)

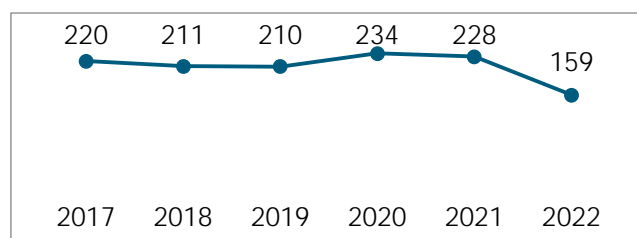
Energy intensity

The company's fossil-fuel energy intensity stood at 58 MWh/€M sales, while energy intensity from renewable sources was 159 MWh/€M sales.

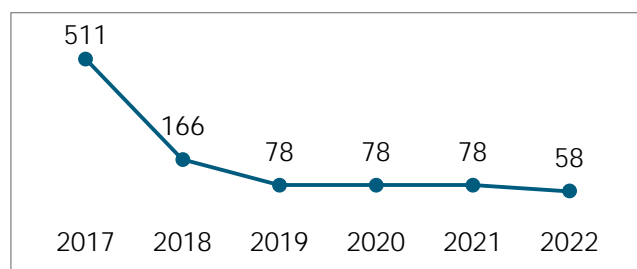
The total energy intensity, resulting from the sum of the two intensities above is 217 MWh/€M sales.

Energy intensity by net revenue (MWh/€M sales)

Renewable energy intensity



Non-renewable energy intensity



Third-party energy consumption

Below is the most relevant energy consumption outside the organisation, calculated according to the company's Scope 3 categories.

The company's GHG emission reduction goal for Scope 3 intrinsically implies an outsourced energy reduction target.

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Outsourced energy consumption (MWh)

Category	2018	2019	2020	2021	2022
Products, services and raw materials	3,146,573	4,042,020	4,088,407	4,428,129	4,550,349
Capital goods	1,175,302	1,582,766	1,002,310	1,381,229	1,902,354
Activity related to energy consumption (not Scope 1 or Scope 2)	143,618	151,082	140,601	81,819	335,521
Upstream transportation and distribution	183,085	139,819	103,463	128,672	403,963
Waste generated in operations	38,583	13,896	22,847	30,400	35,591
Business travels	69,933	56,434	16,002	24,642	42,098
Employee commuting	236,978	236,219	236,757	255,676	252,022
Assets leased to the organisation	40,404	1,684,416	1,476,799	2,193,532	2,194,444
Use of products sold by the organisation	184,604	87,414	114,339	129,052	113,872
Waste from products sold by the organisation	707	573	596	336	395
Investments	117,670	173,801	189,593	139,576	268,194
Total (MWh)	5,337,457	8,168,440	7,391,714	8,793,063	10,098,803

The headings "Downstream transportation and distribution", "Processing of sold products", "Assets leased by the organisation" and "Franchises" are considered irrelevant for ACCIONA either because these activities are not carried out or their consumption is now included in the company's consumption or in another category of external energy consumption.

The Use of products sold by the organisation category has been re-calculated for previous years in order to include the Silence motorbike sales.

The 2018 figures include or exclude activities whose attribution to the company as third-party energy consumption has changed. With the current attribution, the figures would be:

Assets leased to the organisation: 1,284,962 (2018). Total: 6,582,010 (2018)

Renewable energy production and emissions avoided

By the end of 2022, ACCIONA had 11,826 MW of renewable capacity installed, generating 23,910 GWh. This renewable production avoided⁵ the emission into the atmosphere of 13.2 million tonnes of CO₂e, 9,065 tNO_x, 25,086 tSO_x and 226 tPM₁₀.

Emissions avoided per country by generating renewable electricity

Countries	Installed capacity (MW)	Production (GWh)	Emissions avoided (tCO ₂ e)
Australia	603	1,075	953,931
Canada	181	524	347,935
Chile	922	2,137	1,802,236
Costa Rica	50	226	210,994
Croatia	30	70	33,146
United States	1,493	2,160	1,292,379
Egypt	186	435	190,204
Spain	5,796	11,720	5,118,497
Hungary	24	40	20,934
India	164	354	322,199
Italy	156	240	106,194


⁵ These emissions correspond to what would have occurred if ACCIONA's electricity production in each country had been generated using the electric-fossil fuel mix.

Countries	Installed capacity (MW)	Production (GWh)	Emissions avoided (tCO ₂ e)
Mexico	1,480	3,723	1,877,789
Poland	101	217	168,223
Portugal	165	364	144,492
Dominican Republic	58	0	0
South Africa	232	484	497,369
Ukraine	100	74	67,534
Vietnam	84	67	65,507
TOTAL	11,826	23,910	13,219,563

* Totals are calculated taking into account all the decimals on each row in the table, which means that the sum of the rows may differ slightly from the total.

WATER

Scarcity of water

ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	• Lower asset valuation	• Revenue increase
ACCIONA media: Information			

Water is not only a limited natural resource, it is also irreplaceable. ACCIONA develops its water management strategy taking into account its role as a manager of the end-to-end water cycle and as a consumer, as well as the availability of the resource, its quality and the balance of the ecosystems it is in.

The company is a leader in the water treatment industry through its involvement in the design, construction and operation of drinking water treatment plants, wastewater treatment plants, reverse osmosis desalination plants and tertiary treatments for water reuse. It does so strengthening its focus on services to cities.

ACCIONA explores innovative solutions and applies the latest water treatment technology whilst boosting the digitalisation of the sector, which it deems essential to achieve more efficient and sustainable water treatment processes.



More information: [ACCIONA Agua solutions](#)

Policies on water and sea resources

ACCIONA has a Water Policy approved by the Board of Directors' Audit and Sustainability Committee. The main objective of this policy is to contribute to the fundamental human right of access to drinking water and sanitation.

The outline of the principles in this policy is:

- Managing water responsibly and efficiently.
- Transparent reporting of the results from the end-to-end water management.
- Complying with current laws and regulations on water.
- Supporting the development of regulatory frameworks which favour the sustainable management of this resource.
- Establishing mechanisms to control and assess the efficient management and responsible use.
- Supporting the development and use of new technologies.
- Including water use and management in the Company's risk management strategy.
- Raising awareness of the sustainable use of water resources through partnerships with stakeholders.
- Transferring this policy to the entire value chain.

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ACCIONA's water management strategy stands out for its strict compliance with the law, responsible and efficient management, the establishment of specific objectives through the Sustainability Master Plan, the development of and investment in new technologies, the integration of water into risk management, the extension of its principles to the value chain and transparent communication.



More information: [Water Policy](#)

Also, ACCIONA establishes prevention measures to minimise possible impacts on species that might be found in river ecosystems and other bodies of water, and also creates standards to respect the environmental flow system and the technical requirements set by the appropriate environmental administration.

The company uses prevention measures, such as water treatment prior to discharge or the installation of systems that improve the connectivity between river sections. The purpose of this is to minimise any potential impacts on species living in aquatic ecosystems.

The processes that guarantee compliance with the requirements for water harvesting and discharge are part of the environmental management systems implemented, verified and certified by the company according to the ISO 14001 international standard.

Targets for water and sea resources

ACCIONA's target for water and sea resources, set forth in the 2025 Sustainability Master Plan focuses on making the most of the water resource and reducing the company's consumption in countries suffering from water stress due to low water availability.

In 2022, this target translated into an 11% cut in the consumption of surface water, groundwater and municipal water in water-stressed countries compared to 2020.

Water consumption

ACCIONA's use of water

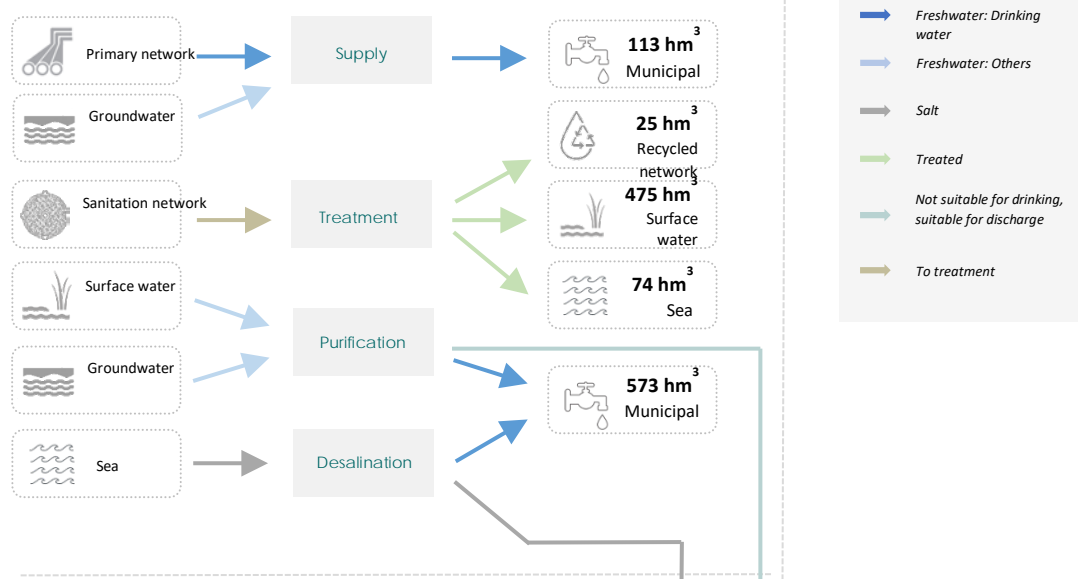
In its operations, ACCIONA uses water in three different ways:

1. **Treatment and distribution of water for customers:** this includes water that is collected in desalination, drinking water and water treatment plants or services operated by the company to cover its customers' demand for water. The principal characteristic of these waters is the fact that the quality levels must be fit for human consumption or compliant with the legally established decontamination levels.
2. **Water for internal consumption:** this is water used by the company at its own facilities. This use includes *freshwater* type water harvesting such as municipal, surface and groundwater. The water sources that do not deplete the natural reserves available, such as rainwater, recycled water from the mains and water reused or recycled on site, supplement the water used for its own facilities.
3. **Discharge:** this refers to the residual water from internal consumption that has not evaporated or been used in any company assets and that is removed from the facilities as specified in the relevant discharge permits. All wastewater discharged by the company complies with the specifications in the relevant discharge permits.

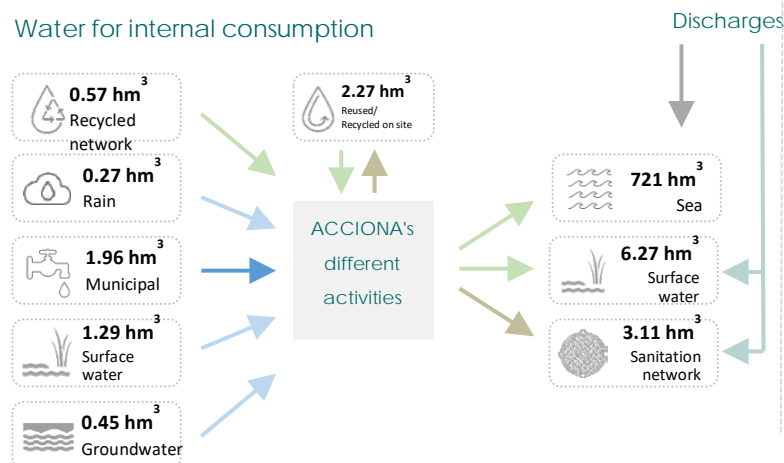
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Water usage in 2022

Water treatment and distribution for customers



Water for internal consumption



Water treatment and distribution for customers

In 2022, the amount of water treated by ACCIONA was 1,149 hm³, which is more than the previous year, largely because of the opening and maintenance of the wastewater treatment plant in Gabal el Asfar, in Egypt, that grew the production of treated water by over 52%.

On the other hand, the water distributed from primary networks and groundwater sources amounted to 113 hm³ compared to last year. This is a 23% increase.

Water for internal consumption

The amount of water for internal consumption increased, especially the water recycled and reused on site, as a result of the operations at the Gabal el Asfar plant in Egypt, which uses part of the treated water for its own maintenance.

Furthermore, ACCIONA has calculated the water consumption (surface and groundwater) associated with its suppliers, resulting in just over 16 hm³ for its direct suppliers and 62 hm³ for its entire supply chain.

In 2022, 46% of the water consumed by ACCIONA came from rainwater, recycled water from the mains and water reused or recycled on site.

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Discharge and bodies of water significantly affected by water harvesting

ACCIONA needs to collect and discharge water for certain activities:

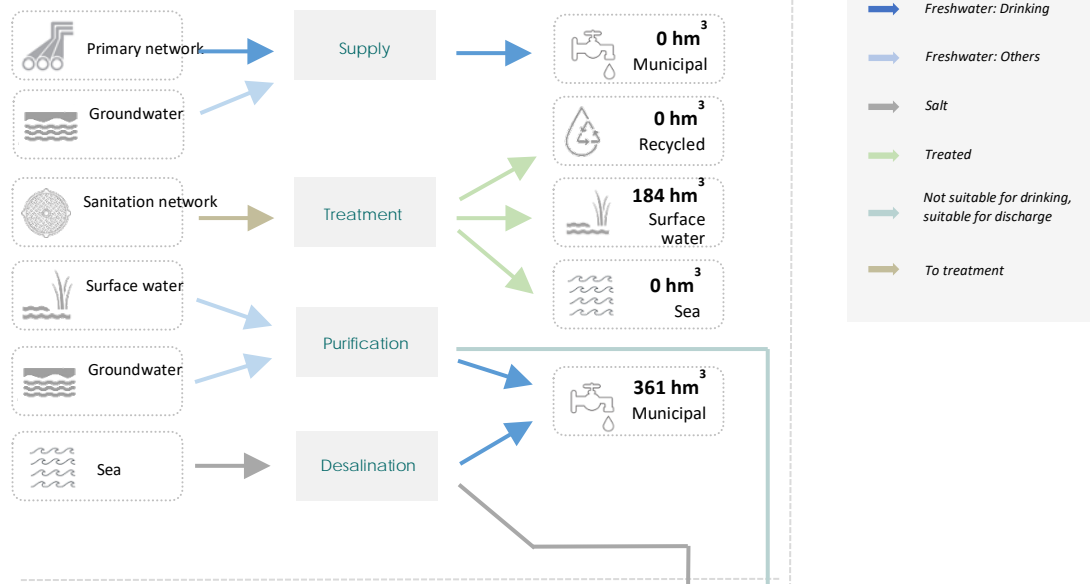
- Production of renewable electric power in hydroelectric power plants, where the water is sent back to the riverbed without altering its composition after going through the power plant.
- Drinking water supply through special treatment plants (DWTP) and seawater desalination facilities.
- Executing works.

The waste generated was 730,692,712 m³, which is less than last year due to the end of the Al-Khobal 1 project. This section includes brine discharged from the desalination plants which accounts for the highest percentage of its discharges.

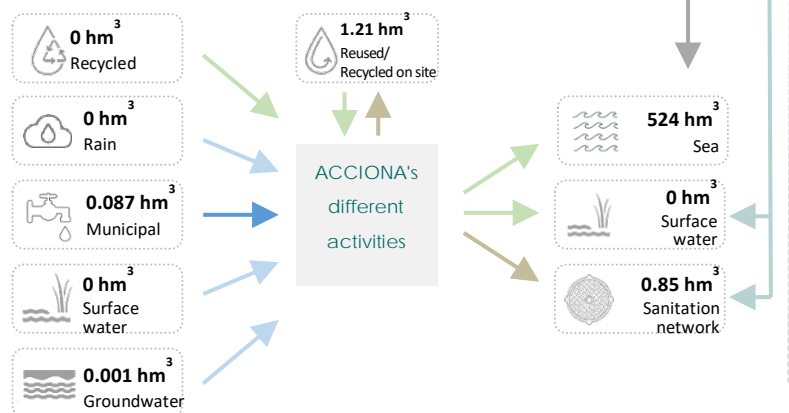
Water consumption in water-stressed countries

ACCIONA's water consumption in water-stressed countries

Water treatment and distribution for customers



Water for internal consumption



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Water treatment and distribution for customers

In 2022, the amount of water treated by ACCIONA in water-stressed countries was 545 hm³, which makes up 47% out of the company's total water treatment for customers. Water production processes in water-stressed countries focus on seawater desalination in Saudi Arabia, Algeria, Qatar and United Arab Emirates, (UAE) and the treatment and purification in Egypt.

In 2022, the amount of water treated grew compared to the previous year, largely because of the opening and maintenance of the wastewater treatment plant in Gabal el Asfar in Egypt, that grew the production of treated water by nearly 50%.

Water for internal consumption

The amount of water used for ACCIONA's own consumption in water-stressed countries was 1,294,230 m³, of which 93% came from rainwater, recycled water from the mains and water reused or recycled on site.

This amount has increased, especially in the on-site recycled and reused category, as a result of the operations at the Gabal el Asfar plant in Egypt, which uses part of the treated water for its own maintenance.

In 2022, ACCIONA's target to reduce the use of surface water, groundwater and municipal water in water-stressed countries was set at 11%. The actual cut was as much as 12%.

Discharge (significantly affected bodies of water)

Discharges in water-stressed areas have decreased in 2022 compared to the previous year. The discharge of brine by desalination plants make up 97% of all discharges, as this is the largest part of their waste.




Desalination plants in water-stressed countries

ACCIONA continues to carry out its activity to respond to the demand for water treatment infrastructure in regions with water stress or with predicted water shortages due to the climate change.

Over 2022, ACCIONA finished building and began to operate the desalination plant of Shuqaiq 3 in Saudi Arabia, with a production of 450 million litres of drinking water.

It has also begun to build the Jubail 3B desalination plant that is expected to produce 570 million litres of drinking water per day once it begins to operate.

CIRCULAR ECONOMY

Circular economy			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> Higher raw material costs 	<ul style="list-style-type: none"> Lower raw material costs
	Important	<ul style="list-style-type: none"> Higher raw material costs Higher operating costs 	<ul style="list-style-type: none"> Reduced raw material costs
	Important	<ul style="list-style-type: none"> Loss of market share Lower operating costs 	<ul style="list-style-type: none"> Revenue increase
ACCIONA media: Information			

A circular economy model aims to keep up the value of the products and materials as long as possible, minimise waste and preserve resources in the economy, and once the product reaches the end of its useful life, use it repeatedly and continue to create value.

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As for infrastructure, the transition to a circular economy will not only reduce considerably the use of natural resources and the environmental impact, it will also entail a financial opportunity arising from the competitive edge and, if the right processes are put in place, it will enable a better restoration and regeneration of the natural capital.

Our circular commitment

Since 2021, ACCIONA has been following its Circular Economy Policy which establishes an action framework focused on regenerating environments and creating positive renewable energy balances by eliminating virgin materials. The aim is to enable the full circularity of materials used in the processes.

The ambition to make progress with these goals means giving priority to reducing the use of resources and increasing the use of renewable and recycled materials, recycled water and renewable energy in the company's processes. This gives a new life to waste understood as potential raw materials, integrating circular economy into the ESG risk management.

The principles outlined by the Circular Economy Policy are:

- Use technology to optimise and adopt a view of the life cycle that will allow us to innovate with materials during the design phase.
- Use renewable energy, increase operational performance, place special focus on maintenance, value materials and develop a functional provisioning approach. All this, imitating as much as possible nature's behaviour to optimise operational circularity.
- Boost new business and investment models, promote, share and co-create, seeking new uses for complex materials that will foster the performance of local ecosystems.
- Re-naturalise spaces spoilt by operations.
- Support the development of regulations in favour of circular economy, setting objectives and being accountable, and also encourage the development of an environmental statement for the product to help promote circular economy.



More information: [ACCIONA's Circular Economy Policy](#)

Objectives for the circular economy and the use of resources

Under the 2025 Sustainability Master Plan, ACCIONA has resolved to increase its efforts in the area of the circular economy, and to halve the amount of non-recovered waste compared to 2020, and also double the percentage of renewable/recycled resources used by the company.

In 2022, this commitment has translated into the following objectives:

1. A 20% reduction in the hazardous and non-hazardous, non-recovered waste generated compared to 2020.
2. Use of at least 14% resources from recycled/renewable sources.

Actions and resources for the circular economy and the use of resources

ACCIONA's environmental policies seek to boost changes in processes that will help the company leave a positive footprint with its activities. Some of the actions carried out by ACCIONA that are proof of its performance in this area are:

1. Generating renewable energy from inexhaustible sources such as the sun and the wind, and from agricultural and/or forest waste.
2. Producing drinking water from sea water in water-stress areas through the best energy-efficient techniques available and treating wastewater through a process that will preserve and improve the natural capital, facilitating its reuse.
3. Developing infrastructure that benefits and improves transport efficiency, the generation and distribution of renewable energy, waste management and the sustainability of cities.

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4. Providing services in shared electric mobility, infrastructure maintenance, energy management and segregated collection of waste, which includes its transport, classification and recovery.

ACCIONA also optimises the circularity of its processes in the following way:

- It uses life cycle analysis (LCA) tools, to assess and reduce the impact of its developments, and also its consumption of materials and energy. In 2022, ACCIONA ran 7 LCAs.
- It minimises its fossil fuel energy use.
- It rationalises its water use and makes use of alternative water sources that do not deplete the existing resources.
- It gives a second life to the waste and subproducts deriving from its processes: soil, rubble, ash, slag, plant remains and sewage sludge.
- It maximises the usefulness of the materials and uses sustainable resources such as recycled aggregates, renewable materials such as FSC (Forest Stewardship Council) certified wood and biomass, or advanced materials such as composites, which minimise the amount of components used.
- It carries out intensive R&D&i work in all its business areas, improving the efficiency of its processes and the performance of the resources used.
- It uses digitalisation as a catalyst for circular opportunities in construction, through technologies such as Building Information Modelling (BIM), machinery automation and 3D printing.
- It works closely with its stakeholders in raising awareness and giving courses about the circular economy.

Principles of the circular economy applied to building the State-Owned Primary School in Torrevieja

The design of the State-Owned Primary School (CEIP) in Torrevieja is based on sustainable criteria that sets it as a benchmark for decarbonisation:

- Use of green steel with 93% recycled content and, potentially, generating 36% less CO₂ than the industry average.
- Buy green concrete that generates 40% less emissions than traditional concrete but with the same structural properties.
- Recover the material extracted during the digging phase and reuse it as fill for building work.

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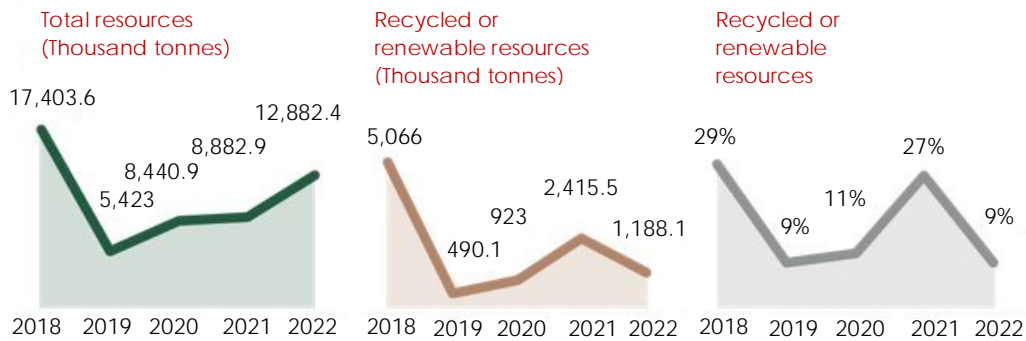
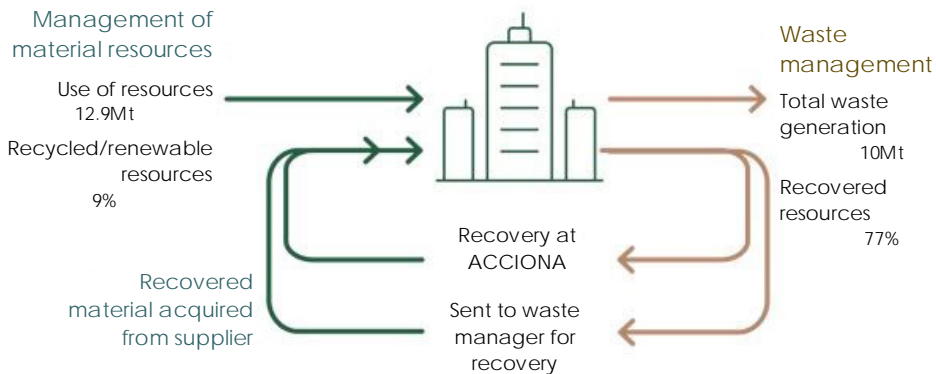


Resource consumption and waste generation

The following diagram shows, as in the Circle Economy⁶ circularity gap chart, the flows of materials at ACCIONA in 2022.

Material flows at ACCIONA

Material flows at ACCIONA



Resource consumption

In 2022, ACCIONA consumed a total 12,882,454 tonnes of resources, which is more than the previous year. The percentage of materials from renewable sources was 9% in 2022.

	2018	2019	2020	2021	2022
Total resources (tonnes)	17,403,599	5,452,965	8,440,914	8,882,855	12,882,454
Recycled or renewable resources (tonnes)	5,065,995	490,135	923,038	2,415,460	1,188,065
Recycled or renewable resources (%)	29%	9%	11%	27%	9%

Recycled or renewable: biomass, certified wood (FSC or similar), soil, aggregates, steel, recycled paper and cardboard

⁶ The Circularity Gap Report: <https://www.circularity-gap.world/>

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Waste generation and management

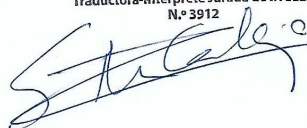
In 2022, the company generated a total of 72,330 tonnes of hazardous waste. This means a large increase compared to the 2021 figure (25,880 tonnes), which is mainly owed to the use of asbestos-contaminated materials in works in Oceania. On the other hand, 9,897,906 tonnes of non-hazardous waste were generated, of which 2,248,899 were sent to landfill and 7,649,007 were recovered (reuse, recycling or other means). The latter figure means 77% of the total non-hazardous waste generation. The increase in waste generation compared to last year is due to the greater earth movement at sites, such as the building work for line 6 in the Sao Paulo underground (Brazil).

It is worth mentioning the reuse of 29,107 tonnes of slags and 3,012 tonnes of ashes, making up 100% of legally recoverable slags and ashes generated in ACCIONA's biomass plants.

Waste generation and management


	2018	2019	2020	2021	2022
Total non-hazardous waste (tonnes)	9,602,772	3,784,469	6,269,769	8,497,787	9,897,906
Non-hazardous waste to landfill (tonnes)	4,053,423	940,177	1,457,220	1,103,724	2,248,899
% Non-hazardous waste to landfill	42%	25%	23%	13%	23%
Non-hazardous waste recovered (tonnes)	5,549,349	2,844,293	4,812,549	7,394,063	7,649,007
% Non-hazardous waste recovered	58%	75%	77%	87%	77%
Total hazardous waste (tonnes)	8,633	2,761	5,071	25,880	72,330
Hazardous waste to landfill (tonnes)	-	-	4,380	10,228	53,191
% Hazardous waste to landfill	-	-	86%	40%	74%
Hazardous waste recovered (tonnes)	-	-	691	15,652	19,138
% Hazardous waste recovered	-	-	14%	60%	26%

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BIODIVERSITY

Biodiversity and Conservation

ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> Lower revenue Bigger regulatory burden 	<ul style="list-style-type: none"> Higher asset valuation
	Significant	<ul style="list-style-type: none"> Higher raw material costs Bigger regulatory burden Lower revenue 	<ul style="list-style-type: none"> Higher asset valuation
	Important	<ul style="list-style-type: none"> Higher operating costs Bigger regulatory burden 	<ul style="list-style-type: none"> Lower raw material costs
ACCIONA media: Information			

The Sustainability Master Plan (SMP) lays down ACCIONA's commitment to protect and restore biodiversity, aspiring to generate a Net Positive Impact across all the company's projects by applying the mitigation hierarchy and nature-based solutions.

ACCIONA is committed to reaching the No Net Loss objective (medium term) and the Net Gain or Net Positive Impact goal (medium-long term) in biodiversity and ecosystemic services. Strict compliance with the laws on environmental impact ensures minimising these impacts and the mechanisms of ACCIONA's certified environmental management systems strengthen and even surpass this compliance. Nevertheless, the existence of certain unavoidable residual impacts may escape the existing legal requirements in some territories. In this regard, ACCIONA works on the evolution of its environmental management systems so that this type of impact is also avoided, reduced, restored or offset, extending its commitments to suppliers, contractors and collaborators.

In line with the commitment above, ACCIONA has a No Gross Deforestation goal, understanding the need to reduce global deforestation, including those associated to the basic products and services the company produces, markets and/or sells.

This commitment translates into the planting of a million trees (besides those already planned to offset some of its projects) over the 5-year SMP period. This way, ACCIONA aims to reach the No Net Deforestation objective offsetting the loss of biodiversity with future voluntary tree-planting.

Biodiversity and ecosystem policy

ACCIONA, through its Biodiversity Policy promotes conservation and a responsible use of our natural heritage, not only as a necessary means for economic development and social progress, but also as a key, high value asset in itself.

The principles laid down in the policy are part of the following topics:

- Conserving, protecting and improving the environment through specific actions.
- Controlling and offsetting the impacts caused by the company's business activities.
- Disseminating and promoting knowledge and courses on biodiversity conservation, highlighting and announcing the actions developed and encouraging best practices.
- Collaborating with public administrations, local communities, social organisations and other stakeholders in the development of biodiversity conservation, raising awareness and researching matters related to biodiversity.



More information: [Biodiversity Policy](#)

Hierarchy of mitigation in biodiversity

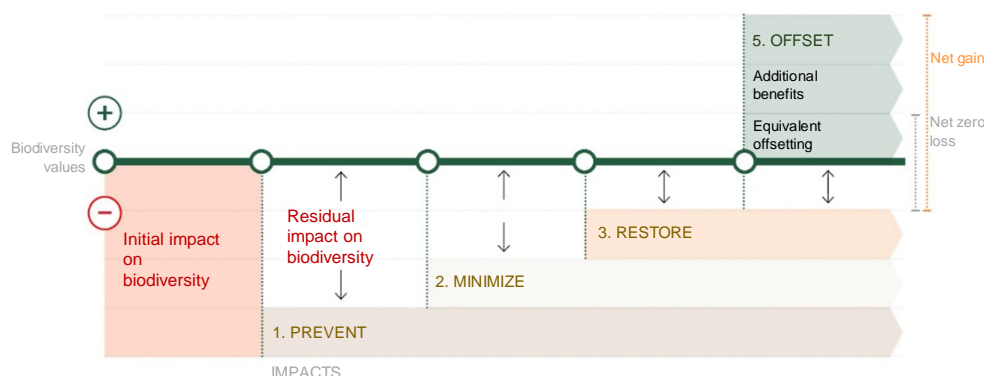
ACCIONA prioritises the mitigation hierarchy strategy against negative impacts on biodiversity. To do so, it identifies and prevents potential negatives effects, minimises those that cannot be avoided, applies restoration actions and takes steps to offset the impacts according to its Biodiversity Policy.

Furthermore, the company develops environmental monitoring plans to control and monitor the initiatives implemented.

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Hierarchy of mitigation diagram

Hierarchy of mitigation diagram



Biodiversity and ecosystem risk management

The company's Risk Management System includes the biodiversity variables and risks through the specific ESG Risk Management procedure. From this procedure we conclude the following:

- Out of the total risks and centres assessed, 16% of the risk score comes from the ESG "Biodiversity and Protected Areas" variable.
- The countries with the highest risk average for the ESG "Biodiversity and Protected Areas" variable in ACCIONA's sites are: Costa Rica, Hong Kong, Croatia and Portugal.

The ESG "Biodiversity and Protected Areas" variable is formed by the existing biodiversity level, the protection offered by certain conservation designations and the level of scrutiny associated to them in connection with the geolocation of the installation assessed.

Also, in 2022, ACCIONA led four pilot projects to assess nature-related risks following the methodology developed within the framework of the Taskforce on Nature-related Financial Disclosures (TNFD).

TNFD framework: Nature-related risk management in four pilot projects led by ACCIONA

The Taskforce on Nature-related Financial Disclosures (TNFD) is a global initiative driven by the need to integrate nature-related risks in financial and business decisions.

To do so, the TNFD suggests a series of developments to be completed by the end of 2023 and coordinated through the LEAP methodology based on four phases: *Locate* (locate activities and ecosystems where the activities will take place), *Evaluate* (identify impacts and dependencies), *Assess* (analyse risks and opportunities) and *Prepare* (report results to investors).

In 2022, ACCIONA led four pilot projects where it tried to implement the nature-related risk management principles from the information published by the TNFD. This provided a first draft of the internal methodology to be applied to its activities.

For these pilot projects, the four phases mentioned above were followed:

Locate

For this phase, the company aimed to identify the four facilities that should be reasonably analysed. To do so, the location of the company's +1,000 projects was intersected with up to 10 layers of geographic information related to the identification of biomass, the level of protection or the level of environmental degradation in each location. Then, more information was added from public databases that quantify the potential impact/dependency of different economic activities on/of different environmental aspects, producing a point-based classification system that prioritises the selection of projects. For this pilot, we also took into account the identification of projects that would bring together the diversity of activities carried out in the company and the speed and accessibility to detailed information.

The projects used in the pilot were:

- Wind Farm in Gouda, South Africa, with over 46 wind turbines.
- Solar Farm in Amaraleja, Spain, with a capacity of 45.78 MWp.
- The building of the Bunbury Out Ring Road (BORR) in Australia to connect different highways.
- Inverse osmosis desalination plant in Copiapó, Chile.

Evaluate

For this phase, the company assessed the possible dependencies of services provided by nature, as well as potential impacts on nature –direct ones and those produced by the supply chain– for each project.

The dependency assessment was based on the analysis conducted in the previous phase, selecting for each project the ecosystem services with highest potential importance. Then it identified the natural elements that those ecosystem services would provide. After this, a series of metrics were allocated to assess (quantitative and qualitative approach) the elements identified that will indicate the level of dependency. This analysis was also conducted on the supply chain with a more qualitative approach.

To assess direct impacts, ACCIONA also used the analysis from the previous phase, selecting for each project the impacts with highest potential importance. Then a series of impact scenarios were generated to create a direct-impact scoring and classification system, using project activity metrics related to the use of elements in the environment, specification metrics on the state of the environment and indicators related to the degree of environmental management of the project.

As for the appraisal of indirect impacts produced by the supply chain, the specification was based on input-output models limited to two types of environmental pressure (use of land and climate change) combined with a model converting environmental pressure into impact indicators on species abundance (MSA).

In the pilot, three projects initially showed relevant dependencies of services for land stabilisation services, erosion control and climate regulation, mainly related to the land transformation they would entail. As for direct impacts, the highest potential impact came from the building project, followed by the desalination project, especially the potential impacts regarding the degradation of protected areas and water quality. As for impacts by the supply chain, the impacts derived from the climatic effect are rated as negligible compared to those affecting the use of land, with similar impact results in the renewable generation plants and in the building project.

Assess

During this phase we identified and quantified the physical and transitional risks related to nature for each of the projects in the short, medium and long term. Additionally, the company explored opportunities that were not connected to a specific project.

The different risk scenarios put forward were based on output from the previous phase, but we also used information from the environmental evaluations for each project. As a general rule, for the dependencies, the company assessed the physical risk scenarios whereas the impacts derived into transitional risks.

As for each risk scenario suggested, we assessed the likelihood of occurrence over three different periods in accordance with ACCIONA's existent methodology for risk assessment, considering the severity of each scenario with a quantitative approach according to the importance of the associated dependency or impact. The combination of likelihood and occurrence determined the inherent risk of each scenario considered, which in a subsequent phase was compared and adjusted following the interviews with the leaders of each project.

After the process carried out under the company's risk assessment standards, none of the 96 risk scenarios analysed were relevant for ACCIONA (either because the impact was negligible or because the environmental management in place minimised the likelihood of occurrence or severity).

Nevertheless, and only considering the inherent risk, it is worth mentioning the following scenarios:

- In the short term, an increase in costs derived from greater reporting requirements due to ACCIONA's presence in protected ecosystems. This applies especially to the wind farm and the potential regulatory violations affecting protected species.
- In the medium to long term, the transitional risks related to law violations due to the emergence of new protection designations (that would not apply to the building work) continue to stand out. As for physical risks, it is worth highlighting a greater exposure to extreme events in the wind farm, caused by the loss of vegetation in the area.

Prepare

Regarding this phase in the project, the goal was not as much about characterising the information gathered under the TNFD requirements, but rather analysing the existing gap in the company in the face of those requirements. In this regard, a series of improvement opportunities were identified. Some of them were determined as to be easily implemented: the ones related to governance, reporting results and tracking target performance. Others, such as implementing new monitoring metrics by project and standardising processes to identify dependencies, impacts, risks and opportunities, are deemed as harder to implement.

Action plans and resources of the biodiversity and ecosystem policies

ACCIONA's projects consider the conservation, protection and restoration of habitats and ecosystems that could be affected by its facilities.

In 2022, ACCIONA protected and recovered 90 hectares as part of its conservation, protection and restoration actions, which entail a net increase of the natural capital. Likewise, the services business has carried out the restoration, cleaning and environmental maintenance of 1,209 hectares of high environmental value.

These habitat restoration and protection actions, as well as other work in landscape integration or reforestation in degraded areas or those lacking in vegetation, in 2022, translated into the planting of 1,014,907 trees in total, of which 145,564 were voluntary reforestation (in addition to the 78,189 trees already planted voluntarily in 2021).

With this voluntary reforestation, ACCIONA makes further progress with its commitment in the Sustainability Master Plan on planting and monitoring the growth of a million trees over the five-year SMP period. This action will boost the management and mitigation of deforestation risks among partners, suppliers and other stakeholders.

Improvement of the aquatic ecosystem on the E6 Ranheim - Vaernes road.

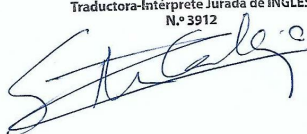
ACCIONA's actions in the project to upgrade the E6 road along the *Ranheim - Vaernes* stretch have improved the aquatic ecosystem in the Trondelag region in Norway.

The restoration work focused on:

- Recovering the continuity of the riparian ecosystems on 8 riverbeds affected by the existent highway, allowing eels and other water species to use it.
- Promoting the colonisation of species that had left the area, relocating them to special areas in some riverbeds such as, for instance, releasing mussels into the Homla river stretch, listed as one of the 390 protected rivers in Norway.
- Improving the habitat for the salamander in areas where they have been spotted.

Additionally, the company adopted measures to re-adapt the end part of the Hoybbybekken river (listed as an important habitat) to create a new reproduction and breeding space for sea trout (listed species).

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Biological pest control in Madrid

In 2022, ACCIONA carried out five biological pest controls in several historical parks in the city of Madrid.

The pests spreading in those parks were damaging and threatening the local ecosystem and biodiversity. To get it under control, we installed nest boxes for birds and insect-eating mammals, which is a biological control method that minimises the use of pesticides and therefore means a pest control method with no impact on native plants or animals.

These actions have resulted in a rise in the occupancy rate of control species by up to 70%, far above that observed in other nesting projects, as well as a 45% increase in the presence of birds and bats since 2021. Also, other species, including geckos, spiders and other insects, have increased their occupancy rate to as much as 90%.

Impact metrics related to biodiversity and ecosystems

Biodiversity performance indicators

Location with respect to the protected area

Location with respect to the protected area	Surface (ha)
Internal	2,325
Partially internal	1,706

Every ACCIONA site that may affect protected areas and the surrounding biodiversity relies on special environmental impact studies and environmental monitoring plans. In 2022, we counted 216 sites that are fully or partially located in protected areas.

Identification and assessment of the most significant impacts

ACCIONA identifies and assesses the most significant impacts of its facilities located in protected and non-protected areas that are of great value for biodiversity. Also, 100% of the company's operational assets are assessed for their potential impact on biodiversity and protected areas and included in the ESG Risk Management System.

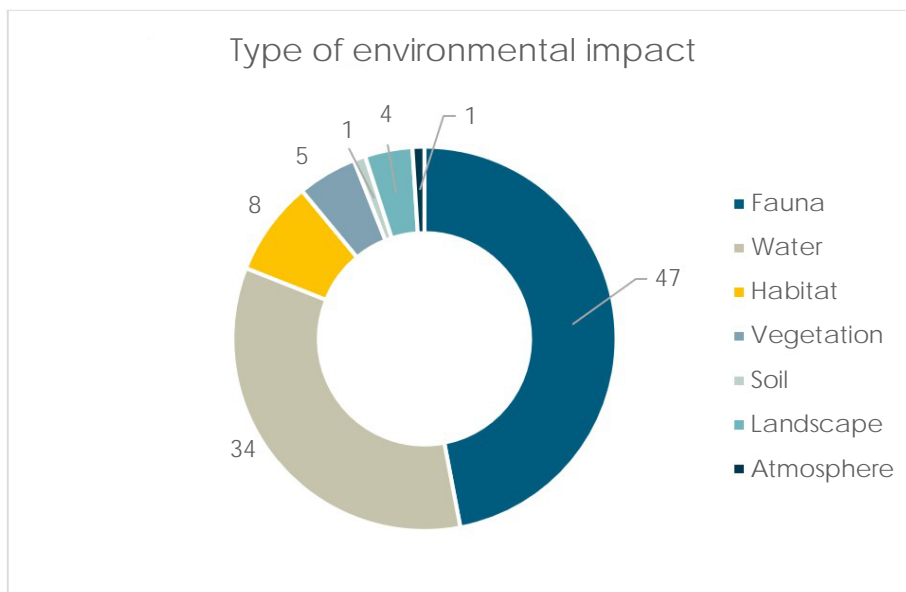
In 2022, the most significant impacts were detected on fauna (47%) and water (34%), and, to a lesser extent, on habitat (8%), vegetation (4%) and landscape (4%).

This assessment took into account the species affected, the surface area of the facility within the protected area, the duration of the impacts, and whether they were reversible or irreversible.

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Most significant environmental impacts by area



Protected species

The company identifies the species affected by its facilities according to the Red List of Endangered Species prepared by the International Union for Conservation of Nature (IUCN) or included in national conservation listings.

The table below shows the number of species and the degree of protection according to the IUCN Red List. Furthermore, it takes into account the species that are not on this list but are protected by national listings.

Protected species affected by ACCIONA facilities

IUCN Red List Protection Category		No. of species
Extinct	EX	0
Extinct in the wild	EW	0
Critically endangered	CR	6
Endangered	EN	10
Vulnerable	VU	19
Near threatened	NT	14
Least concern	LC	158
Data deficient	DD	0
Not evaluated	NE	2
Other national listings	-	14
TOTAL		223

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INTEGRATED ENVIRONMENTAL MANAGEMENT

ACCIONA centres its business model on the design, construction and operation of resilient and sustainable infrastructures, on the decarbonisation of the energy mix through the generation of renewable energy and the mitigation of water stress in large areas on the planet through different processes, including water desalination and wastewater treatment.

In 2022, ACCIONA allocated €146.3 million to managing (preventing, reducing or correcting) the environmental impacts caused by its operations (€139.4 million on expenditures and €6.9 million on investments).

ACCIONA's staff is highly qualified in each of the functional, hierarchical and geographical areas and always contributes the maximum quality and experience required to carry out the company's activities adhering to the strictest environmental standards.

The company continues to further its commitment to environmental training and the development of skills in that area. In 2022, ACCIONA's employees received a total of 6,081.3 hours of training in areas such as climate change, environmental management systems, waste management and environmental restoration of degraded areas, among other subjects.

Inherently, the industrial business involves an environmental impact. Consequently, ACCIONA prioritises the precautionary principle in all its business activities: managing all environmental, climate and water risks comprehensively, reducing and offsetting emissions, boosting circular economy and preserving biodiversity are all actions included in the company's business model.

Principles of successful environmental management

ACCIONA bases its environmental management model on the principles of improving environmental performance. This model establishes a common action framework to coordinate the different management procedures in each unit identified in the company and defines the aspects linked to the environment from the point of view of the life cycle, identifying risks and opportunities as a way of ensuring improvement.

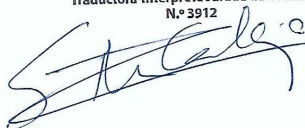
Through its Environmental Management Systems, the company identifies, assesses and minimises the potentially negative impacts produced by carbon and other harmful gas emissions, discharges and waste, or the consumption of resources, as well as noise and light pollution. At the same time, it maximises the positive impacts that materialise throughout the project, from the facilities design to their operation.

The verification and certification of these Environmental Management Systems are done by independent official bodies following the international ISO 14001 standard.

The management model follows these practices as basic principles:

- Identifying, evaluating and minimising environmental alterations that may be produced during the company's activities.
- Identifying and assessing environmental risks through specific regulated technical procedures that measure the risk of an accident that would cause environmental damage or have a negative environmental impact on ACCIONA's business.
- Recording, classifying and repairing environmental incidents.
- Identifying and verifying legal requirements using tools specially designed for this purpose that enable the company to manage compliance with administrative obligations and other commitments, in addition to legal requirements.
- Operational control using corporate tools which compile quantitative environmental information for each location, thereby making it possible to manage the environmental evolution of processes, set targets and define strategies.
- Implementation of tools for continuous improvement, identification and dissemination of lessons learned and good practices.
- Establishment of annual goals on all businesses, taking as a reference the identification of the most significant environmental aspects in the management systems and the SMP.

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Evaluation and monitoring of the environmental impact

In 2022, 101 of the projects promoted by ACCIONA were subject to the Environmental Impact Assessment (EIA). Ten of these received positive reports on their environmental impact. The EIAs for these projects were published in the corresponding official gazettes and platforms were set up by the government to channel citizen participation and obtain their feedback in this regard.

In addition, ACCIONA tracked 366 Environmental Monitoring Plans (EMPs) at centres and facilities that were under construction, up and running or under maintenance.

Environmental incidents

ACCIONA registered and identified 891 environmental incidents in 2022. Six of these involved considerable spills ($> 0.5 \text{ m}^3$ in water / $> 3 \text{ m}^3$ on soil) with a total volume of discharge of approximately 44 m^3 .

The management of the incidents and their subsequent repair, mitigation and/or offsetting was done in accordance with the company's environmental management.

Environmental fines and penalties

In 2022, €9,874 were paid in total for seven environmental fines.

Provisions relating to likely or certain liabilities, litigations in progress and compensation or outstanding obligations of an undetermined amount of an environmental nature, not covered by the insurance policies taken out, are made at the time when the liability or obligation determining the indemnity or payment arises.

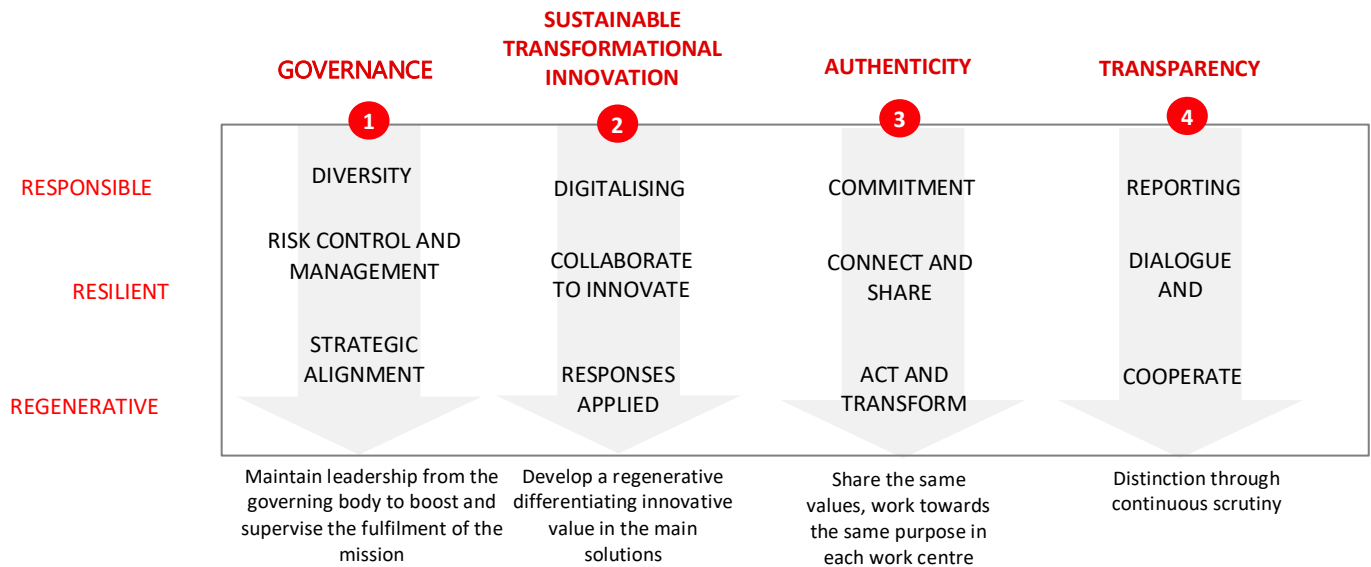
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Exponential leadership

We pursue a purpose

ACCIONA is not neutral. It has a deep leadership vocation in the sustainable transformation of this decade.



KEY MILESTONES 2022

- > Obtained the UNE 19601 standard for Tax Compliance and created the Tax Compliance Body.
- > Took part in the international debate on climate, in the COP 27 and in associations such as CLG Europe and WBCSD.
- > Approved the new corporate mission: *We challenge the present to make the future possible.*
- > 93.7% of contracts with local suppliers.



MAIN CHALLENGES 2023

- > Expand the corporate reports adding to the current ones some specific ones on Human Rights and Diversity.
- > Consolidate an ESG budget with key indicators that range from people and the environment to environmental impact management.
- > Disseminated the new corporate mission through campaigns and courses for employees.
- > Continue to deploy the Enhancement of the Supplier Risk Map through the new SCRMM methodology, which means that 60% of suppliers will have ESG assessment, monitoring and improvement plans.

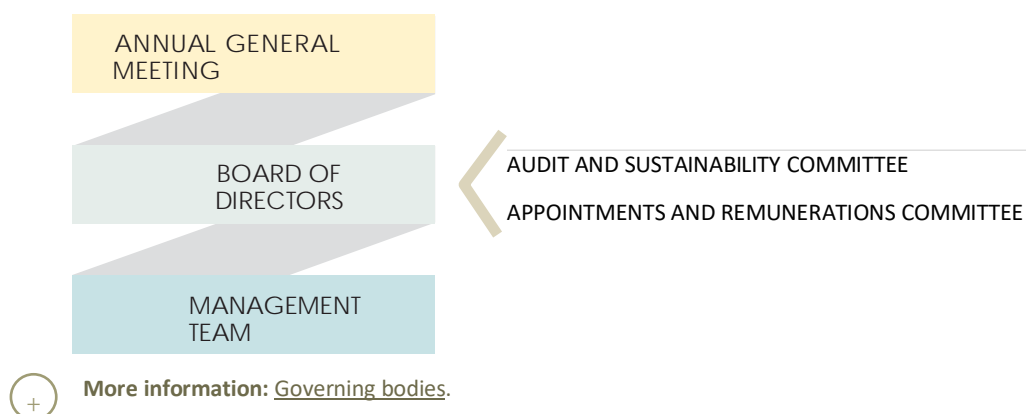
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GOVERNANCE

Corporate governance

The organisation is governed by the recommendations set out in the Good Governance Code of Listed Companies of the Spanish National Securities Market Commission (CNMV), and also the best national and international practices on this subject.

Government structure at ACCIONA

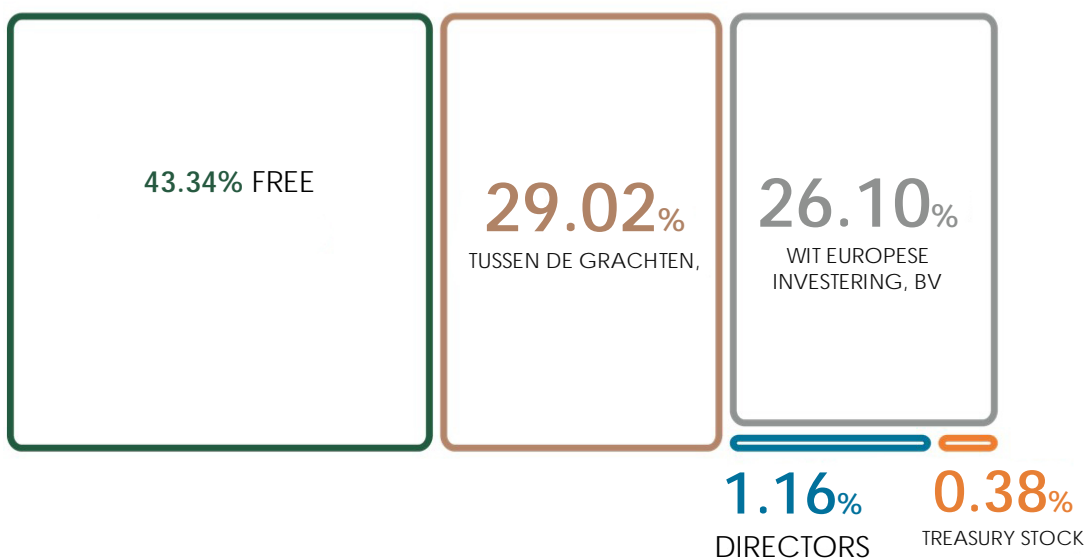


Shareholders and the Annual General Meeting

At the time of this report, the share capital of the parent company was represented by 54,856,653 ordinary shares registered by book-entry securities, each with a par value of 1 euro, fully subscribed and paid up.

Shareholdings as of the date of preparation of this report

SHAREHOLDINGS ON THE DATE OF THIS REPORT



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The company's Articles of Association do not contain any restrictions or a maximum limit on shareholders' voting rights. Nor are there any limitations by law or the Articles of Association on the acquisition or transfer of shares, without prejudice to the pre-emptive acquisition rights, which are reciprocally granted to two significant shareholders declared to the company pursuant to the shareholder agreement notified to the CNMV (the Spanish National Securities Market Commission) by means of material event number 147698, duly registered with the Companies House.

ACCIONA sets up an online shareholders' forum prior to the Annual General Meeting (AGM) in order to guarantee and facilitate communications with all shareholders, including minority shareholders, pursuant to the terms of the Spanish Capital Companies Law. Here shareholders can put forward motions they wish to add to the agenda announced in the call notice of the Annual General Meeting, applications to support said motions, initiatives aimed at achieving a sufficient percentage to exercise a minority right provided for by law, and offers and requests for voluntary representation. ACCIONA also establishes permanent channels of communication with its shareholders and investors through its Investor Relations department.

In addition, ACCIONA makes available to shareholders, in connection with the call notice of the AGM, and on its website, a system for remote online or mail-in voting in order to facilitate the exercise of voting rights. The Annual General Meeting held in 2022 was held physically and virtually to facilitate participation and attendance by shareholders or their proxies during the meeting, allowing them to ask questions or express their opinions and exercise their voting rights on the different items on the agenda.

At the Annual General Meeting held on 23 June 2022, various matters were discussed, including the following:

- Approval of a gross dividend of €4.1 per share.
- Re-election of Ms Sonia Dulá as independent director, removal of the directors Mr Juan Carlos Garay Ibargaray and Ms Ana Inés Sainz de Vicuña, and appointment of Ms Maite Arango García Urriaga and Mr Carlo Clavarino as independent directors.
- Approval of the Board of Directors' Remuneration Policy for 2023, 2024 and 2025.
- Authorisation to call the company's General Meetings with at least 15 days' notice.
- Approval of the *Non-financial Information Statement* and the *Sustainability Report* for 2021.
- Re-election of the company's auditors and its consolidated group for 2021.

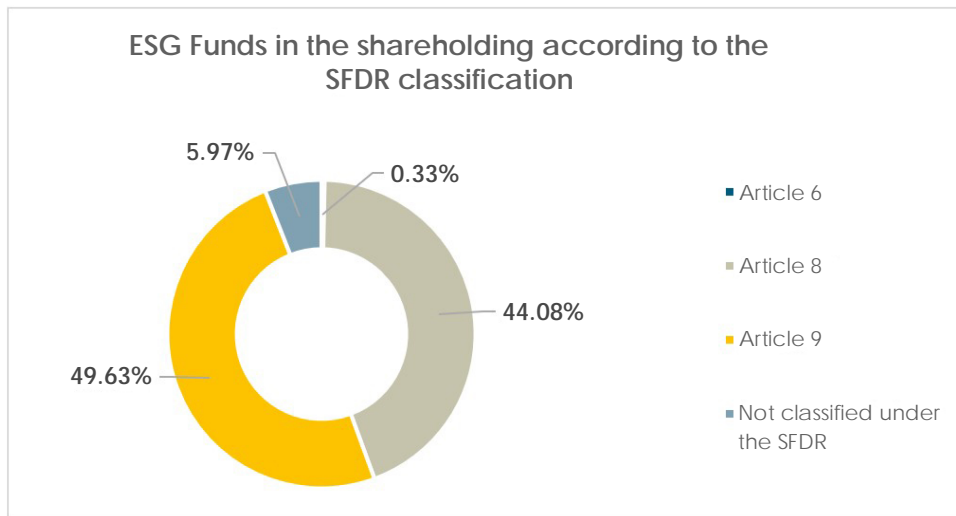
All resolutions were approved with the vote in favour of at least 82.45% of the voting capital in attendance at the AGM.

ESG funds in the shareholding according to the new SFDR regulation

Out of ACCIONA'S total Free-Float Market Cap, 20% belongs to funds with ESG attributes, which shows the investors' trust in the company's sustainable strategy. Half of these ESG funds are classified under Article 9 of SFDR, the strictest classification. This is defined as a "*Fund that has sustainable investment as its objective or a reduction in carbon emissions as its objective*".

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As the regulation on the classification of ESG Funds is developed, ACCIONA collaborates actively with investors to provide the information required on the Principal Adverse Impacts (PAI) with a view to providing full transparency.

Board of Directors

The Board of Directors is the highest management and representative body, with the exception of certain matters that are reserved to the Annual General Meeting. It is made up of a group of professionals with diversity of knowledge, origins, experiences, nationalities and gender, whose aim is to provide real value to the company, working every day with integrity and transparency in the most efficient and effective way.

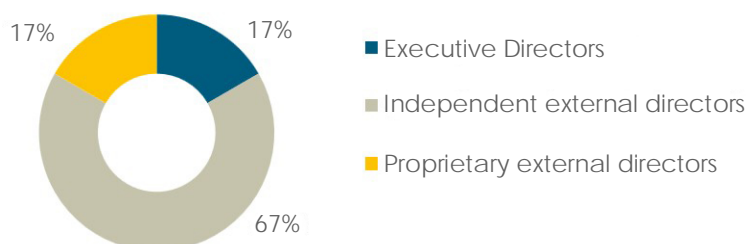
It is ACCIONA's Board of Directors' mission to carry out its functions with a shared purpose and independent criteria, treat all shareholders in the same position as equals and act in the company's interest, understood as achieving a profitable and sustainable business in the long run that will promote its continuity and maximise the company's financial value.

The Board of Directors' Composition Policy includes a new gender representation goal provided for in the recommendations of the Code of Good Corporate Governance of Listed Companies.

The Policy stipulates that the Board members will remain in office for three years and may be re-elected once or several times. ACCIONA's Board of Directors comprises twelve members:

- Ten are external. Of these, eight are independent directors and two are proprietary directors.
- Two of the twelve members are executive directors.

Composition of the Board according to the nature of the position



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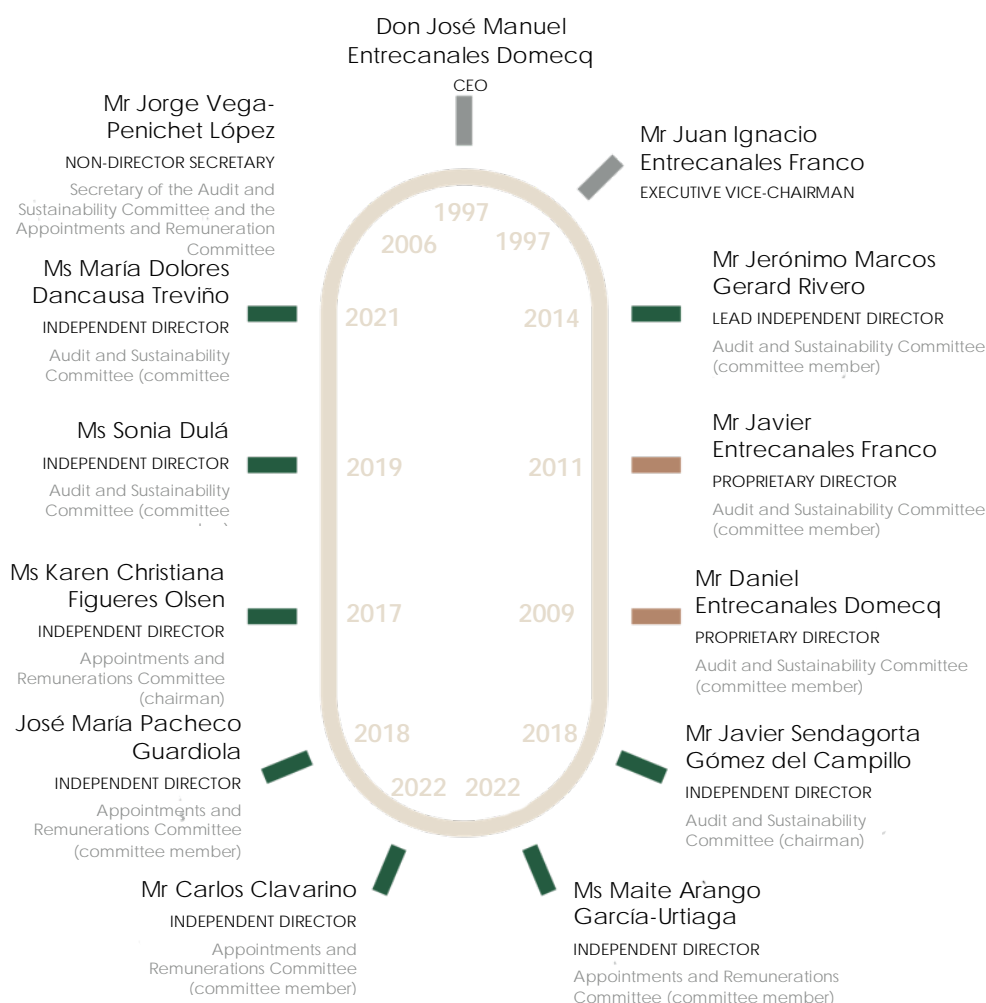
ACCIONA has a Board of Directors' Composition Policy that aims for greater gender parity in its governing body. In this regard, the percentage of female directors on the Board of Directors was 33.3% by the end of 2022.

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Board of Directors as at 31 December 2022

BOARD OF DIRECTORS AS AT 31 DECEMBER 2022



Attendance and meetings of the Board of Directors and Committees in 2022

	Board of Directors	Audit and Sustainability Committee	Appointments and Remuneration Committee
Quorum	100%	100%	95%
No. meetings	10	9	4

In order to respond to current needs, the Board of Directors has a “secure portal” for Directors that allows members to access the information and encourages communication between Directors and the Secretary, while at all times guaranteeing confidentiality, in addition to being able to hold virtual meetings in a safe and accessible environment.

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Every year, the Board of Directors evaluates its operation based on diverse criteria, including its performance and individual contributions, as well as the diversity of its composition and competencies. The evaluation of the functions and positions of the members, Chairman, Vice-Chairman of the Board and Lead Independent Director, and Chairpersons of the committees, is based on the reports submitted by the Audit and Sustainability Committee and the Appointments and Remuneration Committee. The assessment of the performance of the committees and their members will be made on the basis of the report made by each committee to that end.

The evaluation is carried out by means of individual forms that are completed anonymously by each director. Once filled out, the Audit and Sustainability Committee and the Appointments and Remunerations Committee analyse the results and refer the corresponding reports and proposals to the Board of Directors. The Board determines the areas of improvement and oversees their subsequent implementation.

In compliance with recommendation 36 of the Good Governance Code of Listed Companies, ACCIONA conducts evaluations with the support of external consultants every three years. The last one was in 2022 for 2021, when the Appointments and Remuneration Committee appointed an external consultant to take care of the assessment. Furthermore, as an additional evaluation measure, the committee Regulations set forth that they must carry out an annual self-evaluation.

The Board of Directors has a Lead Independent Director. The Regulations of the Board of Directors, in compliance with Best Corporate Governance Practices established in the Good Governance Code of Listed Companies and the Spanish Capital Companies Law, assigns the following functions to the Lead Independent Director:

- Chair the Board of Directors in the absence of the Chairman and the Vice-Chairmen, if there is one.
- Coordinate and meet with non-executive directors. Voice their concerns.
- Maintain contacts with investors and shareholders to ascertain their views and concerns, particularly in relation to the corporate governance of the company.
- Direct the Board of Directors' assessment of the Chairman.
- Coordinate the Chairman's succession plan.
- Request the scheduling of the Board of Directors meeting or the inclusion of new items on the agenda of a meeting already convened.

The Board of Directors agreed in 2021 to join the Audit Committee and the Sustainability Committee as a single Audit and Sustainability Committee, as a manifestation of the company's commitment in terms of sustainability and its close link to the financial activity and ordinary management of the company.

This body is made up of five members, all of them external, being four of them independent, with expertise on accounting, auditing, internal controls, risk management –financial and non-financial– and on economic, financial, corporate and ESG affairs.

Management Team

The Management Team is made up of more than 50 professionals in Spain and abroad, from different departments and areas of expertise. The company reports to the CNMV and publicly announces the members of the Management Team who have roles with managerial responsibilities in accordance with the provisions of Regulation (EU) No 596/2014 on market abuse.

This Management Team is the connecting link between the Board of Directors and the rest of the company.



More information: [ACCIONA's Management Team](#)

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Remunerations Policy

During the year, the company has been governed by the Remuneration Policy in force that is available on the company's website.

The company's remunerations policy, including the one for members of the Board of Directors who exercise executive functions, is governed by the following principles:

- Consistency with the business strategy.
- Corporate governance and transparency.
- Balanced design.
- Internal equality.
- Alignment with market practice.

In addition to the above, the company has a *2020-2029 Long-term Incentive Plan linked to the Creation of Value aimed at the Executive Directors of ACCIONA, S.A.* –or the 2020 LTIP– which intends to align remuneration with the company's long-term objectives and interests. The 2020 LTIP is under a multiannual framework to guarantee that the evaluation process is based on long-term results and that it takes into account the underlying economic cycle of the company.

The *Annual Report on Directors' Remuneration*, approved by the Board of Directors, includes the information on the effective application of the remuneration policy for its members and details the consideration received by each director.



More information: [Remuneration of ACCIONA's Directors](#)

Ethics and anti-corruption

Ethics and anti-corruption (business conduct)			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden • Loss of market share 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Higher operating costs • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden • Higher asset valuation
	Important	<ul style="list-style-type: none"> • Higher raw material costs • Bigger regulatory burden 	<ul style="list-style-type: none"> • Higher asset valuation • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Bigger regulatory burden 	<ul style="list-style-type: none"> • Positioning against a bigger regulatory burden
ACCIONA media: Important			

Fight against corruption, bribery and money laundering

The specific policies established by ACCIONA to fight corruption and bribery, as well as money laundering, are as follows:

- **Anti-Corruption Policy:** approved in 2013 and revised in 2018, this policy establishes the group's clear and explicit position against any corrupt or criminal act, which extends to all persons who are part of the company in their professional performance.
- **Crime Prevention and Anti-Bribery Policy:** approved by the Board of Directors in 2018, it reinforces the group's commitment to zero tolerance of illegal activities, through permanent monitoring measures for prevention and detection, effective communication and awareness mechanisms for all employees and a business culture based on ethics and compliance.

These guidelines have been developed on the basis of international standards and have been implemented in the organisation under corporate regulations and instructions that regulate aspects including: donations and sponsorships, selecting partners and hiring business consultants, interacting with public officials, gifts

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and hospitality, international trade sanctions, antitrust compliance, prevention and management of conflicts of interest, recruitment and ACCIONA Bonus.

The rules deriving from these policies apply to all companies that are part of ACCIONA, to all its employees and to third parties that are related to the group.

The Anti-Corruption Guidelines were approved by the Board of Directors in 2016. They provide specific guidelines to avoid improper conduct and are applicable and mandatory for each and every employee and all stakeholders involved with ACCIONA (including agents, intermediaries, advisors, consultants and suppliers).

Organisation and management model to prevent crimes and corruption

The company, in the process of running its business, maintains relations with public administrations and participates in infrastructure bidding processes in various countries. It is therefore necessary to analyse the corruption risks for each project, based on the country involved and the importance of the operation in question. However, policies and control measures have been put into place to prevent or identify any possible cases of corruption.

The Compliance Management and Internal Audit Management supervise the functioning and the effectiveness of the internal procedures, controls and commitments established to ensure that the obligations are fulfilled, whether imposed by law or voluntary, of an ethical, organisational, environmental or social nature, and that any associated risks are prevented, identified and mitigated. The Compliance Department reports to the Audit and Sustainability Committee of the Board of Directors.


ACCIONA has adopted and implemented an Organisation and Management Model for Crime Prevention and Anti-Corruption (MPDYA), the characteristics of which are as follows:

- It is designed bearing in mind the organisational structure of the group, assigning each department with specific risks of a crime being committed and the corresponding monitoring of those risks.
- Each risk is linked to internal controls that mitigate the likelihood of their occurrence.
- The internal controls set rely on a number of specific attributes determined, amongst others, by the area or department responsible for performing them and the precise description of the monitoring activity.
- The MPDYA includes control measures taken from other Internal Control Systems, including the Financial Reporting one, the Social Safeguards one and the Tax Compliance System, all of them aiming to prevent certain risks included in the scope of the MPDYA.
- The risks and controls foreseen in the Model are regularly reviewed and overseen.
- The controls foreseen in the Model, as well as the main corporate regulations on compliance, are certified every year by the persons in charge of control and the Management Team.

The main initiatives carried out in 2022 in this field were:

- The Corporate Standard for Selecting Partners and Hiring Business Consultants.
- ACCIONA Energía has earned AENOR's double certification for the Management System for Criminal Compliance (UNE 19601 Standard) and the Anti-bribery Management System (ISO 37001 Standard). Both certifications are proof of the company's commitment to a culture founded on integrity, transparency and regulatory compliance.
- The company has continued to deploy its Compliance Model in all the countries where ACCIONA Energía and the Infrastructures division operate, taking into account the standards set forth in the corporate regulations and the regulatory requirements of each territory.
- The persons in charge of control and the Management Team have requested the certification of awareness and compliance with the Code of Conduct, the Anti-corruption Regulations, the Anti-corruption Policy, the Crime Prevention and Anti-bribery Policy, the Corporate Standard for Preventing and Managing Conflicts of Interest, the Corporate Antitrust Compliance Standard, the Tax Policy and the Corporate Standard of the Internal Control System for Social Safeguards.

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- Senior managers were directly involved in the course on the *Right Way to Work*, related to corporate standards on preventing and managing conflicts of interest and selecting partners and hiring business consultants.

The challenges for 2023 are:

- Complete the analysis of the effective transposition of Directive (EU) 2019/1937 and the repercussions regarding the operation and procedures linked to the company's Ethics Channel.
- Continue to strengthen and consolidate the international expansion of the Compliance Model in ACCIONA Energía and the Infrastructures division.
- Extend the scope of the anti-corruption certification to businesses and countries where ACCIONA operates, in accordance with the local laws and the best international practices (ISO 37001).

There were no corruption risks that materialised during the year, regardless of the fact that in previous years various investigations have been opened related to cost overruns, settlements and claims arising from public contracts involving group employees; in some cases they have been closed or are pending closure, and in others, they are still at the investigation stage.

ACCIONA's anti-corruption standards

The company expressly forbids:

1. Offering or accepting bribes to/from public officials or private individuals.
2. Offering or accepting payment to start or speed up any administrative procedures.
3. Offering or accepting gifts and hospitality to/from public officials or third parties that are contrary to the provisions of these Standards.
4. Making contributions for political purposes on behalf of the group.
5. Obtaining preferential treatment by using sponsorship or donation as a means for obtaining it.
6. Using the company's business relations and contacts in one's own benefit or that of a third party.
7. Establishing business relations with third parties without conducting the minimum due diligence required to know those third parties.

Anti-money laundering measures

In terms of money-laundering, the ACCIONA Inmobiliaria and Bestinver businesses are bound by the provisions of Article 2 in Spanish Law 10/2018, and have therefore established the internal control bodies and procedures required by the current regulations.

All ACCIONA employees are required to pay special attention to any circumstances revealing a lack of integrity of the persons or entities with whom the company maintains a business relationship. Cash payments are not allowed, other than in exceptional cases, with express authorisation and with traceable documentary evidence. In addition, the group monitors cash payments and due diligence procedures with suppliers and business partners.

In 2022, compulsory courses were given to the staff of the liable parties. There is also a general course on money laundering prevention available in the Workday learning module.

Code of Conduct and Ethics Channel

The Code of Conduct reflects the values that are to guide the behaviour of all companies making up ACCIONA. Its purpose is to further the consolidation of a corporate conduct accepted and respected by all employees and executives.

By complying with this standard, the company takes on the commitment to carry out its business in accordance with the legislation in force in each of the countries where it operates, always based on the highest international standards. Amongst others: the United Nations Universal Declaration of Human Rights,

the Conventions of the International Labour Organisation (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the principles of the United Nations Global Compact.

The Code of Conduct, the Anti-corruption Regulations and the Crime Prevention and Anti-bribery Policy must necessarily be read and accepted by all employees. Over 39,200 people have accepted the Code of Conduct.

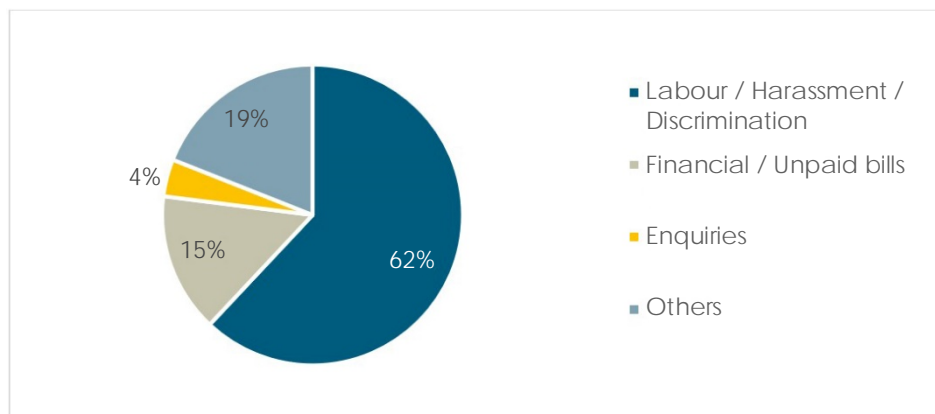
The Code of Conduct Committee is responsible for monitoring and enforcing the Code of Conduct. This body is made up of representatives of the most relevant departments in the group in matters related to ethics and compliance.

The Code of Conduct Committee has the following functions:

Encourage the dissemination, knowledge and compliance with the Code of Conduct and, in general, with the company's ethics and compliance model among the most relevant staff and third parties. The Code of Conduct Committee is made up of 60% men and 40% women.

In 2022, 117 reports were received through this channel. Of those, 85 cases were investigated, 12 by an external investigator and 73 by an internal investigator. The remaining reports were dismissed, either ex officio because they do not fall within the competence of the Code of Conduct Committee, or after having received additional information from the corresponding department.

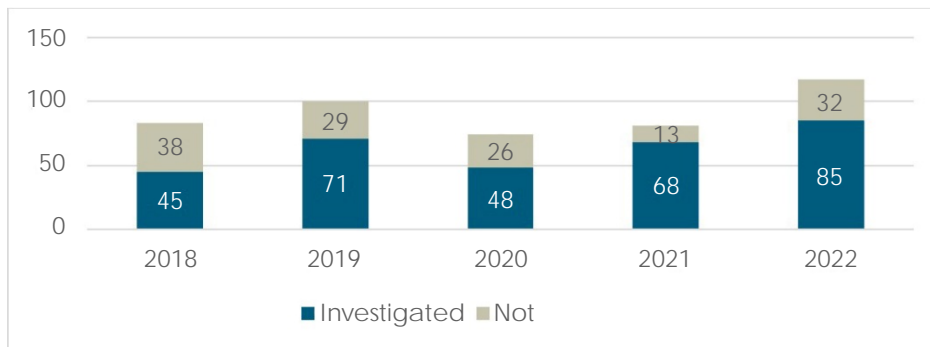
Type of reports



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Processing of reports



File not investigated: as the issue is not regulated by the Code of Conduct (anonymous non-financial, purely labour, organisational or functional complaints) notwithstanding the fact that in a large part of the complaints filed, a preliminary investigation is conducted without appointing a specific investigator).

Out of all the complaints received, 72 were labour matters and 7 were sexual harassment complaints. All the cases in this area have been dealt with. In most of the workplace harassment cases there was no evidence of such behaviour as defined in the legal theory and jurisprudence of the labour courts. Nevertheless, the measures proposed by the investigator have been implemented, such as training courses, team meetings to promote respect and awareness-raising schemes. In the cases of sexual harassment, the corresponding disciplinary measures have been adopted, support has been given to the victims and training and awareness-raising courses on interpersonal relationships in the work teams were given.

On the other hand, there were no complaints referring to giving or offering bribes or any other type of remuneration or similar consideration, to any individual or public or private entity for the purpose of illegally obtaining or retaining a business or a competitive advantage for the group. Nor have any notifications been received relating to tax issues.

Compliance campaigns and training

In 2022, 184 campaigns were made regarding the Code of Conduct, Anti-corruption Guidelines, Ethical Channel, conflicts of interest, donations, competency, gifts, sanctions, compliance tools and ethical culture, amongst others. The management team and the employees have received ongoing information on compliance regulations by intranet, emails and a specific newsletter on the subject.

In particular, 57 publications were posted on the intranet (55 in 2021), which included relevant information on anti-corruption relating to issues such as gifts, bribes, intermediaries and agents or interaction with public officials. Among said publications, three were on antitrust compliance and, in general, they highlighted the importance of using the Ethical Channel to report irregularities, expressly including those regarding the preservation of fair competition.

Through the Compliance Survey it is confirmed that 99% of the employees are familiar with the Code of Conduct, 96% with the Anti-corruption Regulations and 93% with the Ethical Channel.

ACCIONA has a Training Programme on Compliance that includes a mandatory course on the Code of Conduct for all employees and a "Fighting against corruption" course that is mandatory for persons with a managerial or executive role.

As for this year's courses, a new course was given to teach about the corporate standards to prevent and manage conflicts of interest and select partners and hire business consultants, which highlights the senior management's commitment to compliance.

There were also global executive courses on compliance in the Infrastructures division and in ACCIONA Energía to raise awareness of the main corruption risks, referring to the specific laws in each country and to the Code of Conduct, internal standards and procedures and the Ethics Channel.

Furthermore, a course on competition was given to employees from the urban and environmental services business (ASUMA) and ACCIONA Energía. A session on "Criminal liability of legal persons: fraud and corruption in companies" was given to the management team in the Infrastructures division, as well as a session on the protocol foreseen in the event of inspections by authorities on the qualification and

disqualification for senior positions. Lastly, four sessions were given on environmental offences in ACCIONA Energía.

Training per country on the Code of Conduct and in the Anti-corruption Course (no. employees)

Country	Code of Conduct	Anti-corruption Course	"The Right Way to Work" course
Spain	1,412	451	566
Australia	759	208	91
Peru	318	273	84
United States	188	18	14
Chile	168	38	38
Mexico	122	33	177
Brazil	96	35	32
Qatar	56	7	12
Others	342	129	128
Total	3,461	1,177	1,126

Competition cases

In 2022 the following developments in the cases filed against the company for competition affairs took place:

- CNMC (Spanish National Markets and Competition Commission) - Road Maintenance Dossier:

Resolution of the CNMC's Board notified on 19 August 2021 declaring that the existence of an infringement in Competition involving a cartel had been proven, restricting the number of tenders with low bids over a predetermined threshold that could be submitted by the cartel in the tenders for government road maintenance contracts. It is not, according to the CNMC, a distribution of tenders, but an attempt to moderate low bids being offered, which made it impossible to fulfil the contracts.

ACCIONA Mantenimiento e Infraestructuras S.A. ("AMISA") was declared to be in breach, along with another 11 companies in the sector and their parent companies, with a fine of €2,339,737, being the lowest of the 12 imposed. ACCIONA, S.A. was declared to be jointly and severally liable for the breach, not directly, because it is the ultimate parent company of the alleged offender, irrespective of the fact that it did not take part in or know of the breach. It entails objective liability affecting only the payment of the fine.

The CNMC's decision concluded that the contracting ban foreseen in the Public Procurement Act is applicable to the offenders, including ACCIONA Mantenimiento e Infraestructuras, S.A.

ACCIONA has filed a motion to quash the CNMC's decision. The court has agreed an injunctive relief suspending the effects of the monetary fine and the contracting ban.

The contracting ban cannot be enforceable until the proceedings are opened, resolved and have a final decision to determine the scope and duration of said ban. This will not begin until there is a final judgement from the contentious-administrative court upholding the CNMC's decision (ACCIONA has filed a motion to quash it).

- G-7: Note on CNMC disciplinary proceedings against the seven leading Spanish construction companies.

The Spanish National Markets and Competition Commission (CNMC) announced its decision in July 2022, whereby it ruled that there was evidence of a breach of the Competition law, consisting of the collusion to share expenses from related technical studies required to bid for public tenders for civil construction projects in Spain by 6 of the leading Spanish construction companies, including ACCIONA Construcción, S.A. and therefore enforced fines on them. In its

Decision, the CNMC confirmed that ACCIONA Construcción and the other offenders had not coordinated in any way the prices they bid for the projects in question nor did they share out projects.

ACCIONA understands that the conduct punished, with the only purpose to save on bidding preparation costs, is not an anti-competitive practice. It also understands that the CNMC's Decision of July 2022 was made after faulty and irregular proceedings. ACCIONA disagrees with the CNMC's Decision and has filed a contentious-administrative appeal against it, trusting that the courts will realise it contravenes the Law and will therefore, quash it. The court has agreed an injunctive relief suspending the effects of the monetary fine and the contracting ban.

The CNMC's Decision that the contracting ban foreseen in the Public Procurement Act is applicable to the companies it has declared as offenders, including ACCIONA Construcción, S.A. This ban cannot be enforced until the Spanish Consulting Board of Public Procurement initiates and resolves the appropriate proceedings to determine the scope and duration of said ban and the Spanish Tax Ministry enforces said ban. Regarding ACCIONA Construcción S.A., the Consulting Board will not begin said proceedings until there is a final decision on the appeal filed by ACCIONA Construcción S.A. to quash the CNMC's Decision of July 2022. The fine and the contracting ban do not affect any other company in the ACCIONA Group.

Aside from the appeal filed by ACCIONA against the Decision of July 2022, there is also an appeal against the CNMC's decision to reopen these disciplinary proceedings, pleading to have it quashed as it violates fundamental rights. This prior appeal is still awaiting judgement.

Contributions to foundations and non-profit organisations

ACCIONA has a Corporate Donations and Sponsorship Standard. The aim of this standard is to establish a framework of action that allows the group to ensure that donations and sponsorship to charity or non-profit organisations are not a front for illegal payments to civil servants or other people, which would be an infringement of the company's Anti-corruption Regulations. Any contribution of this type made by ACCIONA should not give rise to any doubt whatsoever as to its appropriateness and, of course, it should not involve the infringement of any applicable law. These rules must be complied with by all the companies and employees of the group, and also by any third parties acting on their behalf. Similarly, ACCIONA makes no donations to any political party or candidate nor any foundation that could be considered as political contributions in the terms established in the Code of Conduct.

Contributions to foundations and non-profit organisations are made with suitable analysis of the receiving institutions, and also their reputation and financial transparency.

In 2022, ACCIONA contributed €2,285,571 to associations or organisations promoting sustainability and trade associations, amongst others.

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Contributions to associations for the promotion of sustainability and trade associations

Organisations	Contribution	Institutions receiving the main contributions (in order)
Institutions for promoting sustainability and global dialogue	€95,095	EU Corporate Leaders Group, Foundation for the Global Compact, Infrastructure Sustainability Council of Australia.
Institutions for the technical development of ACCIONA businesses	€519,572	European Australian Business Council, International Emissions Trading Association (IETA), Instituto de Empresa Familiar, Clean Grid Alliance, Roads Australia, Land and Liberty Coalition, Asociación Española de la Carretera.
Trade associations	€1,670,905	SEOPAN, American Clean Power Association, Wind Europe, Associação Brasileira da Infraestrutura e Indústrias, Benban Solar Developers', Australasian Railway Association, Global Wind Energy Council, Asociación Empresarial Eólica (Spain).
TOTAL	€ 2,285,571	

On the other hand, the main matters where contributions were made are the following:

1. Decarbonisation of the economy, clean energy, achieving the goals of the Paris Agreement on climate change:

ACCIONA is actively pursuing compliance with the Paris Agreement and its decarbonisation commitments across all the geographic areas where it operates. To this end, it is involved, whether directly or through collective study groups or trade associations, in training and communication initiatives, in an effort to implement effective measures to decarbonise the economy. At the global and multilateral level, it mainly channels its commitment through global institutions or associations.

In 2022, a total of €927,621 was invested in this area.

2. A water management model based on environmental and economic sustainability, thus contributing to Sustainable Development Goal 6 on clean water and sanitation:

Due to the particular nature of the water sector, which is less visible to the general public, the company pays special attention to the work of communicating and informing society and policy makers of the need to have a more efficient regulation of water management. Water availability and quality will soon be a key issue in many of the countries in which the group is currently operating.

A total amount of €393,791 was invested in this area in 2022.

Due diligence of third parties


This procedure is carried out through the PROCUR-e web site and Dow Jones Risk Centre site for partners, intermediaries and commercial agents acting on behalf of ACCIONA. In addition, the company has three documents that describe how to perform due diligence: the Corporate Procurement Standard, the Corporate Procedure for the Certification and Evaluation of Suppliers, and the Corporate Standard for the Hiring of Business Consultants. The Dow Jones Risk Centre allows the company to obtain the necessary information on the identity of the third party, who manages and directs the company, any possible links these individuals may have with public officials, or any potential litigation in relation to corruption, money laundering, fraud or involvement with tax havens and sanction lists, amongst other information. In 2022, 327 third parties were registered.

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Tax Information

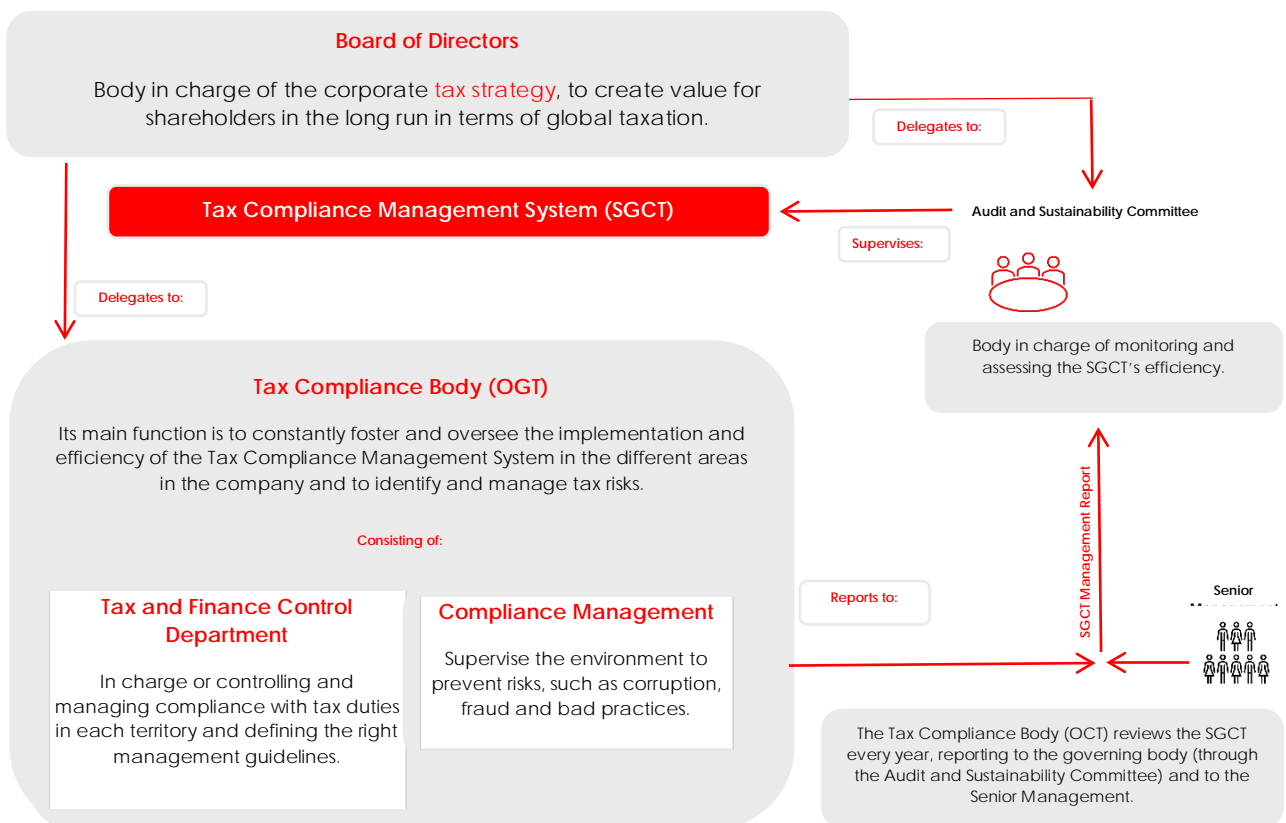
Tax policy

Responsible taxation			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> • Loss of market share • Lower revenue • Bigger regulatory burden 	<ul style="list-style-type: none"> • Gain market share
ACCIONA media: Information			

ACCIONA considers that tax systems are essential for a country to ensure society's progress and welfare and to keep its macroeconomic stability. The global scope of the company's operations gives it the chance to contribute to the development of public services and fight inequality in the different societies worldwide.

The company's commitment to responsible taxation is laid down in its Tax Policy, which contains the group's strategy and was adapted to the UNE 19602 requirements and certified in 2022.

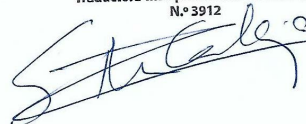
The Policy is based on the principles of compliance with the Law and its reasonable interpretation, transparency, prevention and reduction of tax risks and coordination with authorities, seeking to contribute to the countries and territories where ACCIONA operates.



Detection and assessment of risks and opportunities

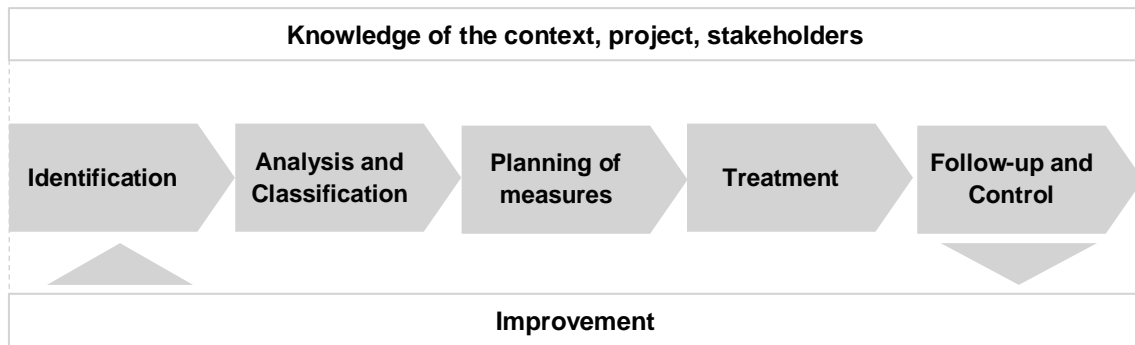
The Group, aware of the context of both the organisation and the interested parties identified, has developed a methodology to identify and appraise the residual and inherent risk of tax risks. Tax risks are incorporated into ACCIONA's Risk Map, using the same methodology and mitigation plans as for the rest of the group's risks.

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The fast-changing political landscapes and their translation into amendments to national tax policies in the countries where ACCIONA operates entail a risk that the company faces through ongoing improvement processes for its Risk Map.

Ongoing improvement process for the Tax Risk Map:



Transfer pricing

Services exchanged between ACCIONA and its investees and related companies are calculated on the basis of the direct and indirect costs of the support services, applying a market margin.

In order to value and quantify the market value of the different activities performed by ACCIONA, we apply the arm's length principle in accordance with the OECD Guidelines. This principle is the internationally accepted standard for assessing the appropriateness of related-party transactions, whose conditions and prices must be the same as those that would apply to independent third parties carrying out the same operations or comparable transactions in similar circumstances. Aside from the results, the comparability, reliability and range are taken into account too.

Dispute and litigation management

Every year, ACCIONA submits an Annual Tax Transparency Report to the Spanish Tax Agency (AEAT) since it signed the Code of Good Tax Practices in 2011. Also, with regard to tax reporting and transparency duties, the company delivers a Country-by-Country Report to the Spanish Tax Agency every year.

It has also been filing its annual voluntary Tax Transparency Report with the ATO (Australian Taxation Office) since 2018. All these reports help prevent new conflicts that may arise from the different fiscal years.

Tax-related conflicts are under the section "Years subject to tax inspection" in the Financial Statements.

The Ethics Channel may be used to report tax-related irregularities confidentially as these violate the Code of Conduct. The mailbox is available to the company's employees, suppliers and contractors.

Country-by-country information

The following table includes information on all the tax jurisdictions in which the entities included in ACCIONA's Consolidated Financial Statements are resident for tax purposes.

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Tax information country by country (CbC)

Tax jurisdiction	Total sales (€M)	EBT (€M)	Corporate Income Tax accrued (€M)	Corporate Income Tax paid on a cash basis (€M)	Employees at the close of 2022	Grants (€M)	Footnote explaining effective rate due	Footnote explaining effective rate paid
Spain	4,925	1,197	250	120.7	20,778	5	1, 10	10
Germany	23	-197	-11	0.05	277	-	7	2
Mexico	355	73	25	28.6	2,782	-	5, 9	5, 9
Australia	1,637	5	8	0.3	2,921	-	4, 5	10, 11
Poland	402	15	3	4.3	1,567	-	6, 9	9
Philippines	141	23	7	5.9	352	-	4	4
Italy	143	31	23	22.7	577	-	5, 9	5, 9
Brazil	432	55	19	4.4	3,830	-	4, 5, 10	10
United States	125	-82	-60	1.2	222	-	8	10, 11
Canada	432	-5	8	0.6	862	-	3, 7	2
Chile	517	-111	-11	0.1	3,228	-	7	2
Others	2,057	-136	-10	25	8,496	-		
Total	11,195	868	254	215.2	45,892	5		

The complete list of ACCIONA companies, and also their main activities, is published annually in appendices I, II and III of the Consolidated Financial Statements.

Furthermore, the social cash flow and tax contribution is published in the Summarised Report. Notes on the "Reconciliation of the accounting profit to the taxable profit", "Taxes recognised in equity", "Deferred taxes" and "Reporting Obligations" are published in the Financial Statements.

The Earnings Before Taxes (EBT) is the consolidated figure after allocating corporate analytical costs.

Explanatory notes on the differences between the effective tax rates and the nominal tax rates:

- Reversal of non-deductible expenses (non-taxable income).
- Tax losses in the year.
- Application of unrecorded tax credits.
- Allocation of consolidation vs. local accounts (Corporation Tax payments).
- Tax rate for Corporation Tax higher than in Spain.
- Tax rate for Corporation Tax lower than in Spain.
- Non-capitalisation (recording) of tax credits.
- Capitalisation (recording) of tax credits (BIN).
- Non-deductible expenses and adjustment for inflation.
- Application of tax credits.
- Deferral for accelerated depreciation / unrestricted depreciation.
- Non-application of the tax consolidation method.

On 31 December 2022, the amount of capital grants and operating grants received by the Company amounted to 2 and 5 million euros respectively.

None of the jurisdictions in which ACCIONA operates is considered a tax haven under the Spanish legislation contained in Royal Decree 1080/1991, as amended by Royal Decree 116/2003.

Tax-related content presented in the Sustainability Report is verified in accordance with the ISAE 3000 standard by an independent auditor, as is the rest of the report.

Relationship with the auditor

The item "Remuneration and other benefits" of the Consolidated Annual Accounts contains the information on the fees in relation to auditing services and other services provided by the auditor of the group's consolidated annual accounts, KPMG Auditores, S.L., and by companies belonging to the KPMG group, in addition to fees for work invoiced by the annual accounts auditors of the companies included in the consolidation and by the entities linked to them through control, joint ownership or management.

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The *Audit and Sustainability Committee Report on the independence of the external auditor* is prepared annually. In this report, the Audit and Sustainability Committee of the Board of Directors delivers an opinion on the independence of the external auditor for each financial year in relation to ACCIONA, S.A. and its subsidiaries, and in accordance with applicable legislation on the independence of the Auditor, specifically Spanish Law 22/2015 on Audits, and EU Regulation 537/2014.



More information: [Board of Directors and Committees](#)

Cybersecurity

Cybersecurity			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> Lower asset valuation Loss of market share Bigger regulatory burden 	<ul style="list-style-type: none"> Gain market share Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> Higher operating costs Bigger regulatory burden 	<ul style="list-style-type: none"> Positioning against a bigger regulatory burden Lower operating costs
	Important	<ul style="list-style-type: none"> Higher operating costs 	<ul style="list-style-type: none"> Lower operating costs
ACCIONA media: Information			

Cybersecurity has always been an endless race, but it is changing at an increasingly faster pace. The study published by the World Economic Forum in 2023 highlighted cybersecurity failures as one of the most important threats in the short (0-2 years) and medium term (2-5 years).

The company has an Information Security Steering Committee made up of the CFSO, the Corporate Security Manager, the Technology and Processes Manager, the Human Resources Manager, the CFSO of ACCIONA Energía, the Corporate Resources Manager of ACCIONA Infraestructuras and the Group's Cybersecurity Manager. This committee is responsible for promoting and supporting the establishment of technical, organizational and control measures that guarantee the integrity, availability and confidentiality of information, within a general framework to manage cybersecurity risks. This makes such measures compatible with the necessary sharing of information and knowledge between the various organizational areas in ACCIONA.

For coordination purposes, there are different operational Cybersecurity Committees, in which the main cybersecurity managers of the different areas, functions, companies and territories that may be determined in each case participate. Moreover, ACCIONA Energía has established a specific Cybersecurity Committee.

Within the framework of ACCIONA's cybersecurity, (compliant with the different international standards, including NIST CSF and ISO 27001), all the control targets and procedures are defined for cybersecurity. As part of this instrument, the company has a Cybersecurity Policy and an employee awareness and training plan, in addition to procedures and mechanisms so that any worker is able to report a security incident or suspected security incident. At the same time, it holds the ISO 27001 certification for the information security management system associated with the security services provided internally from the central offices.





Furthermore, the group has established processes to prevent interruptions and cyberattacks on the IT systems.

In 2022, the company has made headway with its detection and response power against incidents and with the group's cybersecurity operations centre. During the year, there were no cybersecurity incidents that impacted the group's operations.

In 2023, the company intends to step up employee awareness and training and continue to improve the cybersecurity model, in line with regulatory changes and client requirements.

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SUSTAINABLE TRANSFORMATIVE INNOVATION

Innovation in the industry			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> Lower asset valuation Loss of market share 	<ul style="list-style-type: none"> Lower operating costs
	Significant	<ul style="list-style-type: none"> Higher operating costs 	<ul style="list-style-type: none"> Lower operating costs
	Important	<ul style="list-style-type: none"> Higher raw material costs Lower revenue 	<ul style="list-style-type: none"> Lower operating costs Revenue increase
	Important	<ul style="list-style-type: none"> Loss of market share Higher operating costs Higher raw material costs 	<ul style="list-style-type: none"> Lower raw material costs
ACCIONA media: Information			

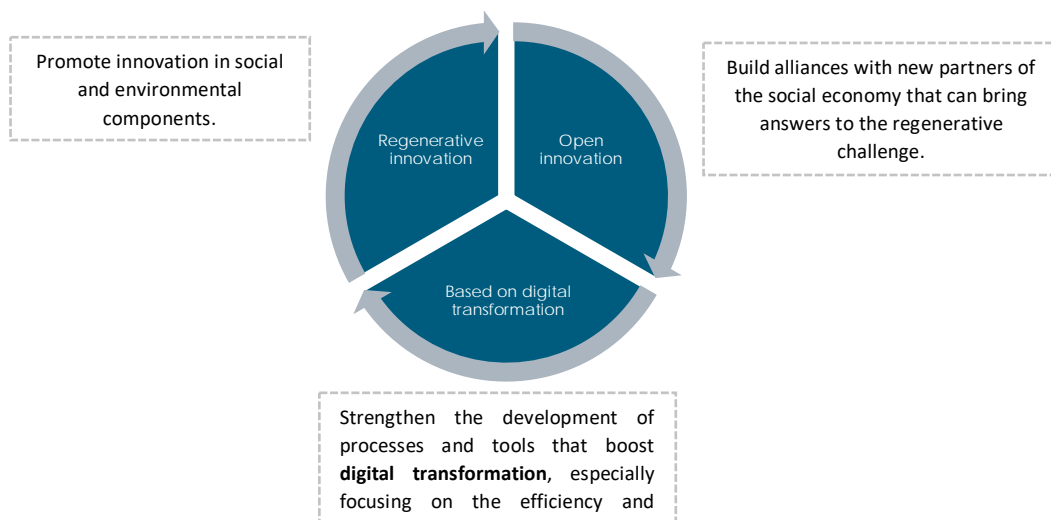
Innovation is a cross-cutting enabler of ACCIONA's corporate strategy, allowing it to increase the positive impact of its operations on the economy, environment and society. Sustainable transformative innovation paves the path to lead the business sustainability sector with a portfolio of entirely sustainable solutions.

ACCIONA's open, disruptive and digital innovation reaches every level and is deployed across the board. This allows us to develop the capacity, products, processes and services required to design a sustainable reality that is accessible to everyone and respects the environment and communities, whilst also influencing every project in the company.

Seeking to improve technical capacity in the Infrastructures and Energy sectors, ACCIONA decided to support the creation of two innovation areas specialised in these industries. On the one hand, we have the CAI (Corporación ACCIONA Infraestructura) area –which in turn includes the Water and Construction area– and on the other hand, the Energy area. With this, the company can meet its technical needs in a granular way. Besides its specialised areas, ACCIONA encourages innovation in all its business units.

Our commitment to innovation

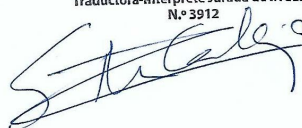
ACCIONA's strategy, developed through the Sustainability Master Plan, aims to:



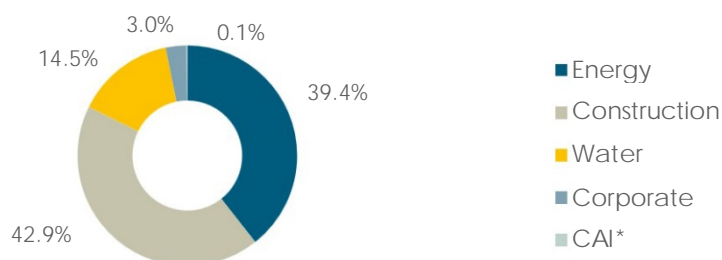
ACCIONA's innovation in figures

In 2022, ACCIONA reported spending €262.8 million euros on innovation, 5% more than a year earlier. The portfolio of projects for the year totalled 185. 67 of these were R&D projects and 118 innovation projects. The company has carried out 16 projects outside Spain worth €115.4 million, representing 44% of the total innovation figure reported.

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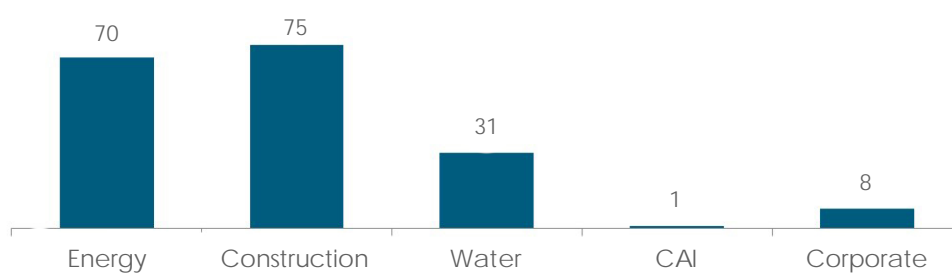


Distribution of the innovation figure by business line (%)

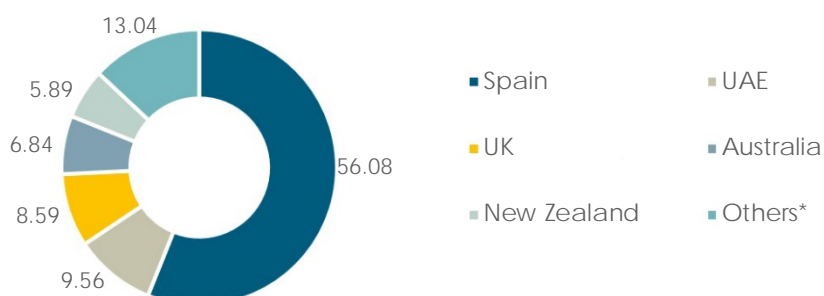


* Corporación ACCIONA Infraestructura

No. of innovation projects by business



Innovation expenditure by country (%)



* Others include: Norway (2.73), Philippines (2), Canada (1.82), Brazil (1.77), Peru (1.6), Mexico (1.28), Paraguay (1.18), Panama (0.39) and Portugal (0.27)

“The 2022 EU Industrial R&D Investment Scoreboard” report, produced by the European Commission’s IRI (Economics of Industrial Research and Innovation), ranks ACCIONA as the seventh Spanish company and the 134th European company for R&D&i.

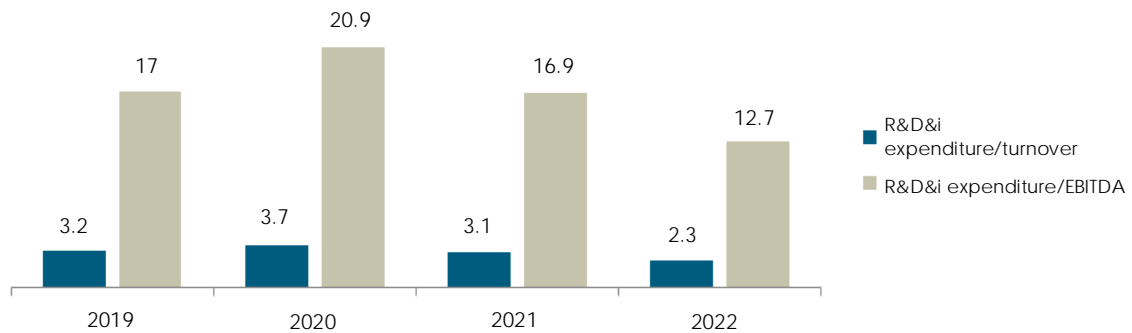
ACCIONA's Innovation expenditure

		2019	2020	2021	2022
R&D&i expenditure (€M)		230.4	237.0	250.2	262.8
EU Industrial R&D Investment Scoreboard	EU ranking	156	141	121	134*
	Spain's ranking	6	6	7	7

* Data under review at the time of this report.

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Evolution of innovation intensity (%)



The innovation intensity ratio is obtained by dividing the innovation expenditure by the turnover. In 2022, this ratio was 2.3%.

Strategic Lines of Innovation

ACCIONA considers that being at the forefront of technology in its business sectors is a strategic priority and therefore tries to speed up the changes needed for a sustainable development and, at the same time, generate value for the company. By establishing specific objectives and action plans for the Infrastructures and Energy businesses, ACCIONA has been able to make progress with the company's strategy for innovation in 2022.

Construction Technology Centre

The Construction Technology Centre aims to equip ACCIONA's construction work with technological products or services that will bring a competitive and differential value compared to other companies in the sector. It also aims to have a positive impact on the cost and time and help minimise negative impacts on the environment and society.

The Technology Centre carries out its research projects in three large areas:

1. Decarbonisation: promising emerging technologies, green hydrogen, carbon capture.
2. Industrialisation: focus on construction processes aligned with the business specialisation areas.
3. Digitalisation: cover the digital needs in projects. Production control, asset control, improvement of project management.

Projects:

In 2022, ACCIONA Construcción launched, as part of its R&D&i strategy, the project to Deploy the Earth-moving Platform at two of its sites, FARGO (USA) and Site-C (Canada).

In 2022, we also worked on the basic design of a semi-submersible floating platform (S-Bos), which was the first stage in the project to develop and deploy Floating Platforms for Offshore Wind Turbines.

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Water Technology Centre

The Water Technology Centre is engaged in R&D activities related to water and membrane technologies. These initiatives range from the most basic laboratory work to pilot plant studies and industrial scale-up. Tools are used for modelling, using fluid dynamics and for carrying out structural studies.

In addition, ACCIONA has a series of demo plants located in water treatment plants, where activities are conducted under real conditions that supplement those conducted at the technology centre.

The Technology Centre carries out its research projects in three large areas:

1. Desalination and new technologies.
2. Purification and water reuse.
3. Purification and water chemistry.

Projects:

ACCIONA Agua, the group's water business, set itself the challenge of identifying the potential of biofouling in the seawater supplied to the company's reverse osmosis desalination plants and to establish operational preventative strategies. In 2022, at a pilot plant, the company selected and constantly evaluated a fouling sensor for reverse osmosis membranes to determine the potential of biofouling in seawater. It also developed a base fouling predictive model which is expected to include different bioindicators in coming releases.

On the other hand, in 2022, the company also completed the design of the Diffusair® technology for seawater flotation systems, with the 3D printing of 60 Diffusair® nozzles. Its efficiency will be assessed over the next year at the desalination plant in Qatar.

Energy Technology Centre

The Energy Technology Centre focuses on innovating in the renewable energy field, increasing its scalability to transition towards a decarbonised economy.

The Technology Centre carries out its research projects in these three areas:

- Extending the useful life of assets, maximising production, advanced solar technology, innovation to ESG, storage and hybridisation, renewable hydrogen, vehicle to grid, waste to industry, advanced technologies in operation and maintenance (O&M), new business models in digital innovation.

More information on innovation in renewable energy technologies available in ACCIONA Energía's Sustainability Report.

Projects:

ACCIONA Energía is present in the development of two out of the three demo projects of offshore wind turbines chosen by CINEA (European Commission).

It has continued to monitor the environmental behaviour and the production of the floating solar plant in the Sierra Brava reservoir (Spain) and has begun to work on developing new technological solutions as part of the project on the channel-based agrisolar research farm. The company has continued to deploy new technologies in El Hub El Romero (Chile) to appraise the increase in production compared to conventional technology and its deployment in future commercial plants.


I'MNOVATION #Startups

In 2022, ACCIONA ran 11 projects with startups as part of its open innovation programme, I'MNOVATION #Startups. These 11 startups are from different countries and introduced their solutions to the company's senior management in January 2023. Some of the most remarkable sustainable projects were: the development of technology to reduce the use of salt on roads, the development of a sensor to detect the level of membrane fouling in desalination plants, reducing consumption and optimising plant performance or the development of a platform for collective self-consumption installations.

The company is still committed to the development of the Spanish entrepreneurial ecosystem by participating in different open innovation initiatives such as *B-venture*, *AI Andalus Ventures*, *South Summit*, *Zebra Ventures* and *Startup Olé*.

In this regard, ACCIONA has continued to collaborate with LANZADERA, the most important startup accelerator in Spain. Within the framework of this partnership, several work sessions were organised with certain ACCIONA departments and the partnerships with startups in its ecosystem had produced a new solution to strengthen security in the new ACCIONA Campus.

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Digital Hub

ACCIONA's Digital Hub came to life to develop digital solutions in-house. It explores innovative technologies to be used in the business, creating a positive impact and gaining a competitive edge.

In order to promote new technologies that will help identify solutions to beat financial and environmental challenges, the Digital Hub takes part in forums to disseminate digital innovation and in programmes to bring technology closer to vulnerable people, and it also works on initiatives to boost talent attraction.

Smart cities	IoT	Data and AI	Robotics	Immersive Technologies	3D Printing
In 2022, different solutions for a circular economy were developed. The SOY ECO platform developed by the Hub encourages the exchange of items at recycling centres through gamification. It has also developed an asad or Computer Vision device that helps separate office waste correctly.	Develop comprehensive solutions based on hardware devices designed in-house to optimise energy consumption in buildings and public lighting.	Develop different artificial intelligence models together with Acciona Mobility to improve business operations in different cities. These AI models predict the number of journeys, the availability of motorbikes by area, changes of battery, and other interesting parameters that help the business with its day-to-day operations.	Development of a robotics solution for the inspection and surveillance of plants with self-navigating functions and manual settings for different routes and tasks to adapt to the different uses and challenges faced by ACCIONA. In fact, ACCIONA has been awarded the ITA Tunneling Awards under the Product/Equipment Innovation of the Year category for its work on the SPOT robotics platform to scan tunnels in Chile.	In 2022, ACCIONA, through its Digital Hub, took its first steps in the Metaverse arena, aiming to become pioneers in an area that is yet to be discovered so as to explore and grab the opportunities it holds. Along these lines, the company has ventured into a few Metaverse experiences for different businesses.	Installation of sustainable street furniture in the Barqueta property development in Seville led by ACCIONA Inmobiliaria. This concrete furniture was built with its own 3D printing technology. This same technology was used to print indoor furniture made of lightweight concrete for the Campus ACCIONA site.

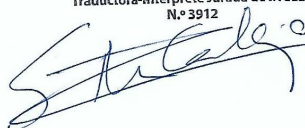
Focus on collaborative innovation

ACCIONA, with its strong focus on innovation, has kept up its partnerships with different associations and worked with them, sharing industry activities and strategies and pursuing institutional support to R&D (European Commission, CDTI, etc.). It also organises workshops on success stories, lessons learnt and future plans that will help develop corporate innovation initiatives between peers and the strengthening of the innovation ecosystem of I'MNOVATION.

Partnerships with stakeholders

- 9th ECTP *Annual Conference*, which was held at the Madrid Town Hall in the Cibeles Palace.
- Taking part in sessions on offshore wind energy technologies.
- *Wind Europe – Annual Event 2022* BILBAO.
- *WindEnergy Hamburg* – Global event on offshore technology in Germany.
- Floating Offshore Wind 2022 – Global event on floating offshore technology in the UK.
- Task force of the Economic Cooperation Council on Zero Pollution that gives direct advice to the European Commission in this area.

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- Policy Advisory Committee of the Water Europe (WE) platform, the main European platform for water technologies that regularly examines different water-related regulations and their impact on the sector and businesses.
- Spanish Association for Water Supply and Sanitation (AEAS). Participation in several task forces.
- Spanish Association for Water Desalination and Reuse (AEDyR). Members of the Board of Directors.
- *Institut Català de Recerca de l'Aigua (ICRA)*. Member of the social and corporate Board.



ACCIONA has established a partnership network with many centres of excellence in Spain and abroad, with which it participates on various R&D&i projects depending on the needs detected and the experience of each entity.

It is worth mentioning that in 2022, the LIFE DREAMER project received an award at the Innovation Awards ceremony hosted by the International Water Association (IWA) within the Innovation for Desalination category.

AUTHENTICITY

This area of action arises with a view to prove that ACCIONA's commitment is genuine and that everyone in the group is familiar with it and share it. The company's values are recognisable and they are present in all its activities. The people making up the company recognise that the management is made up of trustworthy and credible persons who have values and are committed to the corporate mission.

Customers

Clients and end users			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> • Loss of market share • Lower revenue • Bigger regulatory burden 	<ul style="list-style-type: none"> • Revenue increase • Positioning against a bigger regulatory burden
	Important	<ul style="list-style-type: none"> • Higher raw material costs • Regulatory burden • Lower revenue 	<ul style="list-style-type: none"> • Lower operating costs.
ACCIONA media: Information			

ACCIONA's clients are as diverse as its businesses. They are fundamentally large organisations –Business to Business (B2B)– from the public and private sectors, and financial investors. However, some group companies, such as the water, services and real-estate business units, have direct contact with the clients or users of the services provided: *Business to Customer* (B2C).

Communications and customer relations

The communication channels with the company's customers pursue accessibility and agility. Taking into account the diversity of the customer portfolio of each business, communication is managed using a wide variety of channels, ranging from face-to-face attention to own web spaces for each of them.

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Communication channels with customers



- CRMs, such as the one used in the businesses of energy retail, airport services and energy services.
- Personalised managers, such as in the wind projects of the energy business or in the contracts for the removal of waste and landscaping with the head of service as reference.
- Regular meetings such as the investor conferences organised by Bestinver.
- Customer websites, such as the private area for customers in ACCIONA Inmobiliaria and Bestinver, or the water platform that offers 360º viewing for users.
- Digital media and support.
- Physical service points at the offices for water services or solar installations. Real-estate courtesy tour: clients are sent an invitation to the open-door events where they can see the house before signing the deed.
- Apps to interact with clients, such as in the Mobility business, which opened its Tik Tok channel in 2022.
- Call centre in the real-estate development, energy retail and mobility businesses, available in three different languages: Spanish, English and Italian.
- Official bodies: consumption by email and/or post for Mobility users.
- Chat bot to help clients on the website or the app.

Customer satisfaction

Measuring customer satisfaction helps to plan actions aimed at improving their experience with the company. Given the diversity of ACCIONA's products and services, the company considers a variety of factors in measuring customer satisfaction: from evaluating the meeting of deadlines and team performance in energy and construction projects, to sales management, meter readings or billing by the utility, or availability and incident resolution in services.

The most usual method of gathering information on satisfaction and/or experience with ACCIONA Energía's products, services and projects are surveys. In 2022, the company sent 19,051 surveys, with a response rate of 94%.

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Evolution of satisfied customers (%)

Divisions	2019	2020	2021	2022	2022 target
Energy	98%	99%	100%	100%	
Infrastructures	97%	96%	99%	99.9%	
▪ Construction	100%	100%	100%	99.6%	
▪ Concessions	100%	100%	100%	100%	
▪ Water	100%	100%	100%	100%	
▪ Other			85%		99%
Infrastructure businesses				99.9%	
Other businesses			97%	96%	
Satisfied customers	97%	97%	99%	99%	

ACCIONA Cultura has asked about the appreciation of the concept and design of the project, among other matters. The percentage of customer satisfaction is 100%, and during 2022, no complaints were received from clients.

Meanwhile, Bestinver has continued to reinforce the commitment with its investors, implementing the new area of investments in infrastructure with the launch of Bestinver Infra FCD as an alternative to listed funds already in existence in the firm. Likewise, the range of funds in Luxembourg have been reorganised to make them more accessible to institutional investors. In Bestinver's case, the surveys were about the level of satisfaction with the 20th Conference of Investors.

In ACCIONA Inmobiliaria, the level of satisfaction ranged from 2.4 (post-sales) to 3.8 (booking and purchase) on a 5-point scale. Post-sales companies were hired to minimise delays in the handover of homes and shorten the incident-solving time. In the home post-sale process, the developer does not have the room for action in all phases.

Mobility

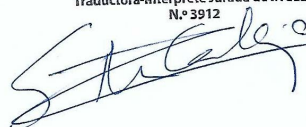
- ACCIONA's best rated platform as an app with a 4.7 score on Apple Store and 4.4 on Play Store for Android.
- **Winner of the Madrid 360 Award:** for Sustainability Mobility 2022, which prizes the best practices and initiatives in mobility in the public and private sectors, aiming to boost and bring visibility to action plans and initiatives by individuals, public and private companies, institutions and any entity leading exemplary mobility projects.

Complaints and claims handling

ACCIONA listens to its customers claims and acts accordingly through:

- Specific procedures in all the divisions to manage complaints, claims and suggestions.
- Accessible channels for customers to raise their complaints, claims and suggestions, such as specific sections on the websites of the water or energy utilities. Contact and follow-up actions with software, such as the one enabled by the Construction division for complaints related to building work or the online mailboxes set up by the Service area in various municipalities.
- Complaint managers appointed to evaluate the complaints and coordinate their resolution.
- Information provided to customers and users on the status of their complaints and their resolution and closure, once the person who filed the complaint confirms that they are satisfied.

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- Yearly recording and measurement of complaints received.
- Measurement of the number of complaints that are closed or pending and the time spent on them. Definition of action and/or improvement plans as needed.

The number of B2B complaints dropped down to 3,221, whereas the number of B2C complaints rose to 18 per thousand customers. 85% of the B2B complaints were closed successfully, while the satisfactory resolution ratio for end-user complaints was 82%.

Evolution of the complaints

	2019	2020	2021	2022
Business to Business (B2B)				
No. of complaints	1,335	1,059	12,949	3,221
B2B complaints successfully closed (%)	86%	88%	83%	85%
Business to Consumer (B2C)				
No. of complaints (per thousand customers)*	17.0	0.07	4.8	18
B2C complaints successfully closed (%)		79%	17%	82%

* Includes Construcción, ASUMA, Agua Servicios, ACCIONA Solar, Mobility and Inmobiliaria.

Complaint resolution times vary from one ACCIONA business to another, depending on the nature of the business. For instance, the resolution time in the International Freight Forwarding business was 50 days (mostly because customers take time to send the documentation requested for paperwork with insurance companies or the airline/shipping company). The average resolution time for Facility Services Spain was 15 days. It usually takes two days for water services and less than a day for incidents in solar farms.

Reduction in the number of complaints in cleaning services

Renfe Operadora hired ACCIONA's audit service which, prior to the audits outsourced by the client, conducts operational controls and reports any errors found through internal channels for their rectification. This system, together with a higher degree of dialogue between the parties concerned, has allowed us to reduce the number of complaints from more than 100 in 2020 to 4 in 2021 and 0 in 2022 (contract ended in October 2022).


Loyalty, recommendation and comparison with competitors

Most of ACCIONA's businesses use additional assessments to measure customer satisfaction, including:

- The recommendations or level of satisfaction expressed by customers when asked: "Would you recommend ACCIONA to other companies?"
- The degree of loyalty which builds lasting relationships over time, by asking customers a direct question: "What is the likelihood of you hiring ACCIONA again?"
- The comparison of the company with competitors using a scale such as better, equal, worse.
- Out of 15 respondents in ACCIONA Construcción, 6 confirmed the likelihood of them re-hiring the company, the rest did not reply.
- 100% of ACCIONA Cultura's customers recommend the services and would hire the company again.
- 92% of ASUMA's customers and 95% of the Forwarding business customers would hire their services again.

In this respect, the assessment of different lines of business in ACCIONA as compared to its competitors is also significant. 87% of clients who answered the ACCIONA Construcción survey confirmed that its service is better or much better than its competitors and 67% of the energy supplier's large account customers in Spain also considered ACCIONA is above its competitors.

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Mobility

During the year, the company runs ongoing campaigns to promote the use of its services and gain customer loyalty. It is worth mentioning:

Gamification: With the first journey of the month, the user enters a league that begins on the first day of that month at midnight and ends on the last day of the month at 23.59h. The user gets points for the amount of carbon saved (1 point = 1g of CO₂) and earns more points with the journeys made during the month and therefore climbs positions on the ranking. The prizes for the top 10 in each league are free minutes for future journeys.

Mondays on wheels: Every Monday morning, the user receives a different offer to start the week with special benefits to enjoy minutes at a cheaper rate.

Customer health and safety

The Quality Policy includes the principle of ensuring the health and safety of its customers and users. Furthermore each of the safety management systems implanted in the company has a policy that sets out the principles and commitments of application approved by senior management and at the disposal of all interested parties.

100% of ACCIONA's products and significant activities are assessed for their impact on the health and safety of customers and users, indicating, where appropriate, whether improvements need to be made.

There are a number of things that ACCIONA does to ensure the safety of its products and services:

- Information to customers on how to safely use its products and services.
- Product quality controls, critical point analysis and safety tests.
- Regulatory inspections and compliance checks regarding applicable laws and international standards.
- In the plants built by the industrial business, HAZOP (hazard and operability) studies are carried out in the design phase, to identify possible design problems early and improve the safety of the installation.
- Safety management systems that guarantee that the work is performed in accordance with the international benchmark standards established for each sector. Several ACCIONA businesses are certified in accordance with various international standards in this area:
 - **Road safety:** a motorway managed by Concesiones, AMISA Construcción and Agua Italia, with legal operational and administrative seat in Brescia, has safety management systems that have been certified as compliant with the ISO 39001 standard.
 - **Safety of Rail Services:** the freight transport safety management system of Rail Services has been approved by the State Railway Safety Agency (AESG).
 - **Airport safety:** Airport Services are certified by ISAGO (Safety Audit of Ground Operations) at the headquarters in Palma, Düsseldorf and Santiago de Chile, in accordance with the regulations of the International Air Transport Association.
 - **Food safety:** sanitisation of food plants certified as compliant with the ISO 22000 standard.
 - **Safety in the supply chain:** ACCIONA Forwarding is certified as an Authorised Economic Operator (OEA) by the Spanish Tax Agency.
 - **Information Security:** the security services in place in the Madrid head offices boast the corporate ISO 27001 certification.

For domestic cold water, the company has implemented COVID protocols in all its cleaning contracts, especially in the hospital, food and hotel industries (protocols for sanitisation and product controls), and in all of ACCIONA's corporate head offices through the corporate framework contract for services.

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Non-compliances

Healthcare has received nine penalties for incidents in the course of its services, but none for negligence in emergencies or lack of material.

Despite not being a matter regarding Health and Safety in ACCIONA's service, the energy supplier in Portugal was subject to an inspection on its compliance with all the applicable regulations and laws in November 2022. Said inspection revealed two faults or missing information that should be included in the bills sent out to consumers: information on the web page for people to file complaints and the web page with OLMC energy pricing simulators. On the other hand, the yearly report for customers is missing recommendations for efficient energy consumption and the customers' pricing history. The company replied to this notice and rectified the faults pointed out.

Product and service labelling

The energy sold by Green Energy has a certificate issued by the Spanish National Markets and Competition Commission (CNMC) which certifies the 100% renewable origin of the energy. Meanwhile, the water business complies with the standards established in the applicable laws regarding the quality of drinking, desalinated water, discharge parameters for treated water and other considerations.

Electric Mobility: For most points on the grid it is guaranteed and assured that the power supplied to our own charging grid is 100% green with Guarantee of Origin (GoO). In other words, it guarantees that the energy comes from a renewable source.

100% of the projects developed by ACCIONA provide all the information needed in the report delivered to customers. In 2022, there is no record of court rulings regarding the violation of regulations or voluntary codes relating to marketing communications or on breaches related to information and labelling of products and services.

Certified management systems

All of ACCIONA's divisions have certified management systems based on the most renowned international benchmarks in terms of quality, the environment and customer and user safety. In 2022, 100% of the company's most important activities were certified according to the ISO 9001 and ISO 14001 standards.

Main certifications in force during the year

ENERGY	ISO 9001 and ISO 14001: marketing and sale of renewable energy with guarantee of origin accredited by CNMC, 100% of the MW installed and provision of energy services (ESCO). This does not apply to Energía Egypt, Hungary or ACCIONA Plug.
	New 2022: Electric Mobility: ISO 9001 and ISO 14001 and Equinov (ESCO France) ISO 9001.
	ISO 50001: 100% of the ESCO (energy services) activity in Spain.
CONSTRUCTION	UNE-216701 PSE-2019/0006: supplier of ESCO energy services.
	ISO 9001 and ISO 14001: 100% of the activity in several countries (Spain, Chile, Brazil, Mexico, Colombia, Canada, Australia, New Zealand, Philippines, etc.).
	AMISA, ASUMA Spain and Mexico and Urban ecosystems.
CONCESSIONS	Green and Gracious Builder Scheme of Singapore
	ISO39001: Road Safety Management Systems in AMISA
	ISO19650-1 and ISO19650-2: Information Management System and BIM in the Building and Engineering businesses (new 2022)
WATER	ISO 9001 and ISO 14001: Concessionary company León Bajío Hospital, Concessionary company A2-Section 2 and ACCIONA Concesiones Australia.
	ISO 39001: Concession company A2, section 2 and La Plata Highway.
	ISO 9001 and ISO 14001: 100% of the water treatment activity in Spain, Italy, Chile, Australia and New Zealand. 100% of the integrated management services.
OTHER INFRASTRUCTURE	ISO 50001: in 15 centres in Spain.
	ISO 39001: Agua Italia (legal and operational office, administrative office and operational office in Brescia).
	UNI EN 16636: Pest management for Agua Italia.
OTHER INFRASTRUCTURE	ISO 9001 and ISO 14001: ACCIONA Infraestructuras Australia, ACCIONA Infraestructuras New Zealand.

BUSINESSES	ISO 9001 and ISO 14001: Healthcare, ASU (extension in 2022 of the certificate to business lines for the management of waste transfer plants, treatment plans and landfill), AMA, Urban ecosystems.
	ISO 179002: Quality Management Systems for Medical transport companies under the Healthcare business.
	EMAS: AMA in León and head offices and Plans de Carballo.
	UNE-EN 1176-7:2021: Installation and maintenance of play areas and surfaces in AMA.
OTHER BUSINESSES	ISO 9001 and ISO 14001: cleaning of trains and stations of Railway Services, handling and driving gangways of Airport Services in Spain and Chile. Facility Services in Spain, Portugal, Mexico and Qatar. Forwarding with the scope: International Freight Forwarding. Real Estate and Cultural Engineering.
	ISO 20121: sustainability of events in ACCIONA Cultura.
	ISO 22000: domestic cold water sanitation in three food plants.
	NP4492:2010: requirements of the provision of maintenance services for Facility Services.
	NP4413:2012: maintenance of fire extinguishers for Facility Services.
	OEA (Authorised economic operator) Certificate: ACCIONA Forwarding.
	Bequal Foundation certifies ACCIONA's commitment to the integration of people with disability.
	ISO 22301: business continuity in Bestinver.

Audits

Internal and external audits by customers and certification bodies are one of the main tools used by ACCIONA to identify opportunities for improvement.

In 2022, the number of audits conducted was 420 in total. 372 of these were internal and 48 external. The majority were conducted to check compliance with the ISO 9001 and 14001 standards. Moreover, the company also received 182 audits from its customers.

Personal Data Protection and the Guarantee of Digital Rights

ACCIONA supports the digitalisation of processes and their automation, thus improving business productivity and the customers and employees' experience. With a view to overcoming the challenges entailed in becoming a data-centred entity, the company believes that having a system that will keep personal data security is a priority.

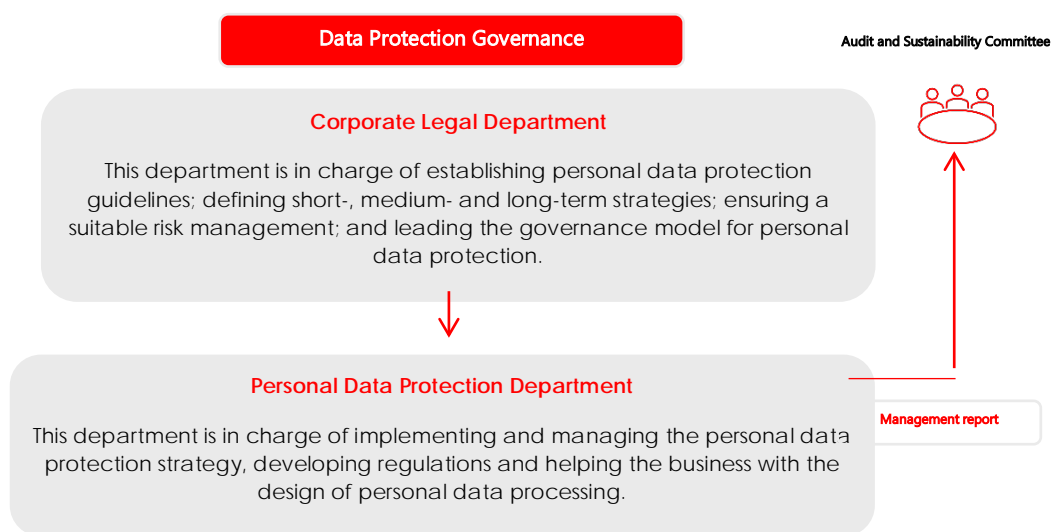
The importance of this matter shows in ACCIONA's Policy for Personal Data Protection and Guarantee of Digital Rights. The internal regulations, with a global scope, sets forth that the company, its subsidiaries and, by extension, all of its value chain, are required to act adhering to the principles and rights set by law for the protection, processing and privacy of personal data.

ACCIONA also has a Personal Data Protection department that leads the organisation's commitment to use and protect identifiable details of customers, consumers, employees and partners in a responsible way.

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To guarantee an adequate management of personal data protection, the following organisational structure has been established:



More information: [ACCIONA's Policy for Personal Data Protection and Guarantee of Digital Rights](#)

The training/information given by ACCIONA to all its employees on data protection is mandatory. In order to extend this culture to the supply chain, as part of the control mechanisms, ACCIONA's suppliers must necessarily accept the statement of compliance on personal data protection.

In 2022, there were no reports on data protection breaches to the supervisory authority and the company has not been subject to any penalties in this regard.

Relations with the Public Administrations and regulatory bodies

ACCIONA keeps a transparent and constant relationship with public administrations in all the countries where it operates. The company considers public participation in the process of adopting any regulatory initiative to be important in order to ensure that the interests of everyone who will be affected by the measures to be adopted are seen to be duly weighed and reflected.

ACCIONA encourages constant dialogue with regulatory authorities, getting involved in each case and always cooperating with them. As a result, the company is actively involved in the development of public policies that affect the areas and sectors it operates in, contributing to lawmakers its experience in the private sector.

Some of the practices aimed at raising awareness are the analysis, studies and dissemination of the results, as well as the participation in putting forward proposals and giving feedback or reasons during the public information stages in the different procedures aimed to set the regulatory framework for each sector.

The company's position is always consistent with its commitment to protect and respect the environment, support renewable energies and sustainability in the use of resources.

Furthermore, it encourages participation in forums, associations and different groups, providing knowledge, ideas, initiatives and experiences acquired for many years, aiming to drive public policies towards a sustainable development and growth, in the social as well as the economic and environmental aspects.

In accordance with its Code of Conduct, ACCIONA does not make financial contributions for political purposes or to obtain preferential treatment. Nor does the company use sponsorship or donations for those purposes.

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Within the European Union, ACCIONA has been registered since 2013 in the EU Transparency Register⁷, which records in a transparent manner, the interests organisations pursue, who defends them and budget allocated to those interests.

As for its collaboration with public bodies in 2022, the most remarkable processes are as follows.

Lines of action: we are not neutral

Activity to which it applies	Examples
Actions that apply to the whole group	<p>Participation in the consultation processes related to the European Commission "Fit for 55" package aimed to review the legislation on climate, energy and transport to adapt it to the goals for 2030 and 2050, and the "Repower EU" package to adjust the EU regulatory framework of the energy industry to today's landscape after Russia invaded Ukraine. ACCIONA's proposals are related to renewable energies, energy efficiency, emission rights trading, sustainable mobility and environmental taxation, among others.</p> <p>Contributions to public consultation and information regarding financial aid schemes in the Recovery, Transformation and Resilience Plan.</p> <p>Contribution to the consultation on reviewing the National Integrated Energy and Climate Plan.</p>
ACCIONA Energia	<p>Contribution to numerous public hearing procedures and participation in the preparation of reports and position papers of various entities and associations, in support of the decarbonisation of the energy sector related to:</p> <ul style="list-style-type: none"> Promoting renewable hydrogen. Development of offshore wind power in Spain. Simplifying the formalities for renewable energy projects, including distributed generation and self-consumption. Proposals to remove regulatory barriers and maximise its potential. Hybridisation of renewable energy technologies. Development and improvement of operating procedures to enable better integration of renewable energy into the power grid and define the right operation of the new flexibility resources and hybrid power plants. Life expansion and upgrading of renewable power projects. Process to access and connect renewable plants. Promotion and regulatory development of new flexibility resources (storage, demand management, aggregation, electric car) and new renewable generation technologies (floating solar farms and on channels). Redesign of the electric market and measures that affect the payment of renewable energy. Offers of financial aids for renewable installations, self-consumptions, storage and renewable hydrogen. Adjustment of the Spanish and EU regulations on power generation with biomass.
Infrastructure, water and services	<p>Participation in numerous regulatory initiatives aimed at promoting the decarbonisation of the economy through:</p> <ul style="list-style-type: none"> Regulatory proposals aimed at enhancing the consideration of sustainability criteria in public procurement. Support to policies that favour energy saving, efficiency and

⁷ <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=451019811573-55>



upgrade.

- Boost the hiring energy management services with guarantees on savings by public entities and support to the development of the market for energy saving certificates.
- Proposals to improve the regulation of the urban water cycle to guarantee the sustainability of the resource, market unity and better consumer protection.
- Support to policies aimed at restoring and regenerating spaces and improving the circularity of building processes.
- Proposals aimed at improving the management, processing and use of waste.
- Proposals for a sustainable mobility: facilitate the deployment of electric vehicles with renewable energies, boost shared electric mobility and improve the regulatory framework of the infrastructure for vehicle charging.

ACCIONA Energía is a member of regional and Spanish associations (e.g. AEE, APPA), of European organisations (e.g. *WindEurope* and *CLG Europe*; *Renewable Hydrogen Coalition* and *European Clean Hydrogen Alliance*, all of them European initiatives on renewable hydrogen) and international associations (GWEC). The company participates actively with them and holds positions of responsibility on their management bodies.

In terms of infrastructure, water and services, the company collaborates with associations such as SEOPAN, in the field of infrastructure; the Business Association for the Development and Promotion of Electric Vehicles, (AEDIVE) and Smart Mobility, in the field of sustainable mobility; ANESE, in the field of energy efficiency; or AGA and AEAS, to promote and defend the common interests of service companies related to the end-to-end water cycle. Moreover, the company plays an important role in the Spanish Group for Green Growth (GECV), an association that defends growth protecting the climate and environment and public-private partnerships for this purpose.

TRANSPARENCY

Transparency and dialogue			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Important	<ul style="list-style-type: none"> • Loss of market share • Bigger regulatory burden 	<ul style="list-style-type: none"> • Higher asset valuation • Positioning against a bigger regulatory burden • Revenue increase
	Important	<ul style="list-style-type: none"> • Loss of market share • Bigger regulatory burden 	<ul style="list-style-type: none"> • Increase of market share
ACCIONA media: Information			

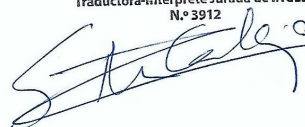
Dialogue and sustainable leadership

The 2025 SMP establishes, as part of its “Exponential Leadership” pillar, the goal of being perceived by our customers as one of the top 5 companies that most contributes to the sustainable development of our key markets. To do so, our participation in open-dialogue forums with our stakeholders and the building of local alliances in the main countries where we operate are essential.

Along these lines, ACCIONA has continued to be a member of the main entities fostering sustainability, including *CLG Europe*, *WBCSD*, *The Climate Pledge* and *UNGC*.

In 2022, ACCIONA has taken part in over 120 public events held nationally and internationally, discussing subjects such as decarbonisation, sustainable finances, climate change, fair transition, biodiversity, circular economy, impact investment, carbon markets, regenerative infrastructures, human rights, businesses with a purpose and leadership.

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CLG Europe

ACCIONA has been a full member of CLG Europe since 2009. This initiative gathers European business leaders who are convinced of the urgent need to develop new long-term policies to combat climate change.

In 2022, ACCIONA signed the Letter promoted by CLG Europe which urged the President of the European Commission, Ursula von der Leyen and members of the EU Parliament to speed up the transition to a green and decarbonised economy, discarding the use of fossil fuels and strongly focusing on renewable energies. A series of examples were attached to the letter, including that of ACCIONA Energía to highlight the decarbonised solutions that European companies are already equipped to offer.

On the other hand, ACCIONA has actively taken part in task forces organised by this initiative during the year, and in different strategic meetings led by the initiative.

World Business Council for Sustainable Development (WBCSD)

Besides ACCIONA's regular participation in events and acts organised by the initiative, ACCIONA hosted a workshop at its head offices for the task force members called "Built Environment" in 2022. The conference gathered about thirty people from all over the world, who were able to discuss the challenges and opportunities found in the sustainable building world in the medium and long term.

On the other hand, the company has joined the pilot task force "TFND" to share ACCIONA's experience in implementing the pilot project for the TFND framework.

It has also been active in the "Policy, Advocacy and Member Mobilization" (PAMM) task force meetings that aims to mobilise businesses for the imperatives of globalisation, climate, nature and equity, in line with the WBCSD 2050 Vision.

ACCIONA has also taken part in the yearly WBCSD Delegates Meeting 2022 held in Switzerland. This event brought together experts from all over the world to work on innovative business solutions for all sectors and value chains.

On the other hand, ACCIONA had the chance to share its view at the WBCSD Council on the matter of critical raw materials in a changing and uncertain geopolitical landscape.

The Climate Pledge

ACCIONA became the first Spanish energy company to join The Climate Pledge (TCP), the initiative launched by Amazon and the NGO Global Optimism, to encourage businesses to become carbon neutral by 2040, ten years earlier than the date established in the Paris Agreement.

In 2022, ACCIONA was able to introduce its decarbonisation initiatives at the first event organised by the initiative in Spain under the title "The private sector's role in accelerating climate neutrality and the goals of the Paris Agreement."

United Nations Global Compact (UNGC)

ACCIONA has been a member of the United Nations Global Compact since 2005. The company regularly collaborates with the Spanish and Chilean Global Compact Networks and in 2022, it took part in the "Early Adopters" programme to prepare the Progress Report through the online app provided by the initiative for such purpose.

Our commitment to the initiative was clearly shown by the participation of ACCIONA's Chairman, José Manuel Entrecanales Domecq, in the High-Level Meeting of Caring for Climate summit held within the framework of the Conference of the Parties (COP) 27.

Also, in 2022, ACCIONA took part in the "#CEOsResponden" (#CEOsAnswer) campaign led by the Spanish Global Compact Network, where the Chairman talked about the need for businesses to support regeneration in order to achieve the goals of the UN 2030 Agenda.

ACCIONA at COP 27

Once again, ACCIONA was at the climate change conference which was held in Sharm El-Sheik, in Egypt. This year, the Loss & Damage topic took over a large part of the debates, reminding people that there are many

countries who are already suffering from the climate crisis and it is necessary to make large investments to restore the infrastructure that was destroyed in those countries.

On the other hand, the adaptation agenda, which is still awaiting the payment of the main investments promised, clearly stresses that the adaptation to climate change impacts must be accompanied by the development of regenerative infrastructure that will enable countries to regenerate and reverse the damages that have already been caused.

The path to decarbonisation followed by ACCIONA in line with its commitment to make a positive contribution to the planet (Planet Positive), allows it to strengthen its stance on decarbonisation solutions which will soon be supported by a market that will coordinate the detailed framework of Article 6, also discussed at the COP 27 conference.

Also, the global demand for climate funding means supported by private and public organisations, highlights ACCIONA's leadership in sustainable finances and the company's wish to integrate to transform operations.

SUPPLY CHAIN

Supply chain			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> Higher raw material costs Lower revenue 	<ul style="list-style-type: none"> Lower raw material costs Revenue increase
	Important	<ul style="list-style-type: none"> Higher raw material costs 	<ul style="list-style-type: none"> Gain market share
	Important	<ul style="list-style-type: none"> Lower asset valuation Bigger regulatory burden 	<ul style="list-style-type: none"> Lower raw material costs
	Important	<ul style="list-style-type: none"> Loss of market share 	<ul style="list-style-type: none"> Gain market share
ACCIONA media: Important			

ACCIONA considers that its supply chain management is a strategic priority for the business as well as a source of opportunities to generate value in the societies where it operates. The geopolitical landscape and the dramatic repercussions of the climate crisis have exacerbated the price variations on raw materials, which means that the supply chain has become one of the main sources of financial risks but also opportunities, as it can have an impact on the company's entire value chain.

This is why ACCIONA believes that keeping a sustainable management system for the supply chain, supported by the state-of-the-art technologies to protect efficiency and able to guarantee human rights and the protection of the environment is the right strategy to produce the resilience sought in a purchasing system that will create long-term value.

This corporate commitment to sustainable management is passed on to the value chain through the Corporate Procedure on Vendor Qualification and Assessment and the Corporate Procurement Standard, both based on the systems for enterprise resource planning (ERPs), planning and reporting tools, and the PROCUR-e system.

Supply chain management approach

The Supply Chain Management Department, coordinated with the Purchasing Departments of the different business units, is in charge of overseeing and executing the strategy described in the 2025 Sustainability Master Plan (SMP) for the management of the supply chain. ACCIONA Energía, since it became listed on the stock exchange, has its own department and separate targets. These are also aligned with the group's and may be checked in ACCIONA Energía's 2022 Sustainability Report.

ACCIONA'S TOTAL FIGURES 2022
25,515 suppliers
+€7,300M (40% more than the amount managed in 2021)

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The 2025 SMP consolidates sustainability within the function, mainly leveraged on the defence of social safeguards, identification of regenerative alternatives focused on reducing the carbon footprint and the development of the sustainable commitment of the supply chain. Along these lines, 80% of employees in the area of purchases has targets linked to sustainability.

Distribution of suppliers by type and division in 2022

Business line	Critical	Local/ National	Total no.
ACCIONA Energía	252	2,724	2,908
Infrastructures	1,662	18,469	19,280
• Construction	1,094	12,357	12,917
• Concessions	8	156	158
• Water	222	2,925	3,150
• Australia	338	3,031	1,055
Service	26	1,579	1,595
Other businesses	111	1,139	1,732
Total	2,051	23,911	25,515

NOTE: The supplier/business assignment is made to companies with a higher volume of contracts with the supplier.

Critical suppliers

The level of criticality is assigned to suppliers and contractors depending on the financial risk. Every supplier with an annual business relationship exceeding €400,000 is considered critical.

Throughout the year, 8.04% of the supply chain base was deemed critical, accounting for 88% of procurement.

Local/national suppliers

Working with local/national suppliers has a positive effect on the economic development of the communities and minimises the operating risk as delivery and execution times are reduced.

94% of the companies or means of distribution contracted are from the country where the project takes place.

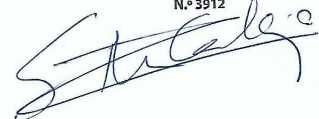
Tools for a sustainable supply chain management

The PROCUR-e tool is a digital system where all of ACCIONA's suppliers must register before working with the company. This tool covers the entire procurement cycle and is the company's main mechanism to know and manage the risks and opportunities in the supply chain. It also offers services to handle tenders and claims by suppliers in a transparent and digital way.

PROCUR-e in figures:

- 63,773 registered suppliers, 59,223 with ESG Risk Map.
- 5,948 RFQs awarded.
- €1,407M awarded in 2022.
- More than 3,000 users around the world.

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These figures from PROCUR-e show an increase compared to 2021 with 20% more suppliers registered with risk map and a 33% rise in users, which shows the consolidation of the tool in the group's procurement ecosystem. For 2023, there are plans to clean the supplier master database to manage them in a more focused and streamlined way.

Over 2022, as part of the strategy to boost the digitalisation of the procurement function and the use of paperless technologies in ACCIONA, we reached the following milestones:

- Procure-to-Pay platform for the online exchange of orders and invoices: over 63,000 invoices and 54,000 orders exchanged without using paper and with double the amount of active suppliers than in 2021, now amounting to 3,863.
- Operation of a new ALIA Platform to obtain full traceability of the supply chain in connection with the manufacturing, document control and quality assurance, transport and storage. It also enables the integration of the different players in the supply chain in real time (supplier, forwarder, customs officer...).
- Migration to a reporting platform and a purchase analysis that is faster and easier for the user and also enables the viewing of a real-time purchases dashboard to help with the decision-making process.
- Deployment of Online Catalogues to manage the spend queue, reaching over 33,000 orders transferred online and divided into 129 supplier catalogues with the resulting benefits of speed and control.

Supplier validation and audit procedure

This procedure remains one of the main mechanisms for managing supply chain risks and generating improvement opportunities and sustainable growth in ACCIONA's purchasing processes.

Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as diverse risks increase related to finances, country, activity, corporate responsibility or sustainability. The levels are:

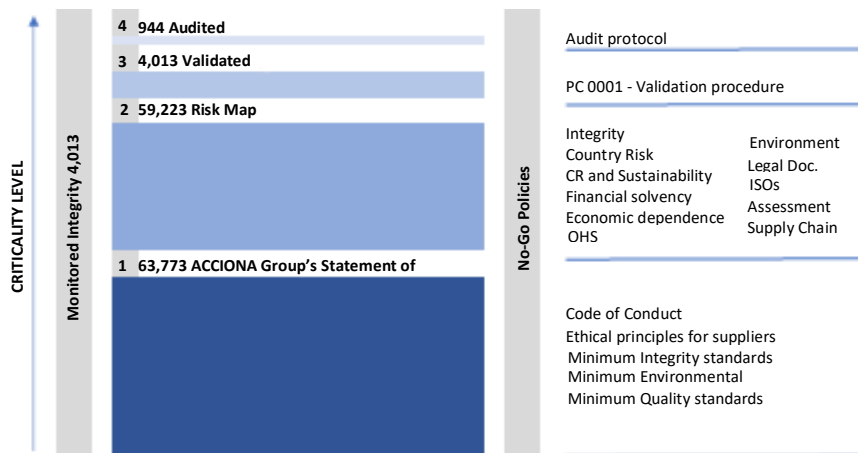
1. Suppliers must accept the group's Statement of Compliance.
2. To be able to bid, collaborating companies must fill in the self-assessment questionnaire in PROCUR-e, so that the company's Risk Map can be calculated and monitored.
3. In order to be awarded contracts over €400,000 (those considered critical suppliers), an additional control is required where the evaluation of the Risk Map is verified with extra due diligence (Validation).
4. Lastly, the highest level involves critical suppliers in risk countries, critical suppliers who are subject to a mandatory audit (MACS) or with significant or recurrent contracts. For this group, social and regulatory compliance audits are carried out by an external organisation that performs an on-site evaluation using the Group's Audit Protocol.

The analysis of integrity and monitoring of No-Go Policies are common at all levels, regardless of the level of criticality.

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Control system in the supply chain in 2022



In 2022, ACCIONA has continued to work on developing the global procedure to control risks and opportunities among suppliers, launching the new SCRM (Social Customer Relationship Management) methodology. The goal set by the department was to streamline the procedure to register and validate suppliers whilst also improving the Risk Map for ESG in order to establish suppliers' criticality level and handle their risks and opportunities.

The main impacts of these changes are:

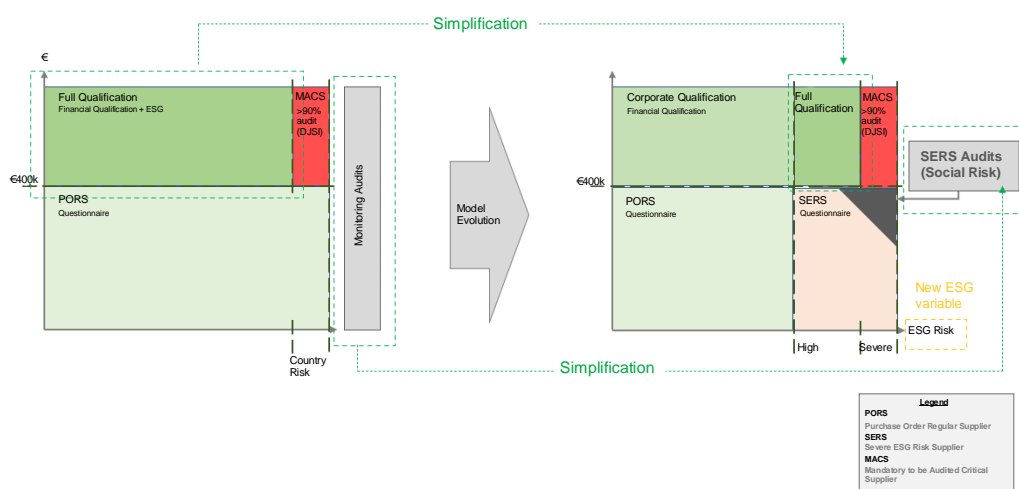
- Supplier segmentation: the financial element is no longer the only factor that determines if a supplier is critical or not. A new ESG risk variable is taken into account to establish the level of criticality regardless of the supplier's sales volume with ACCIONA.
- If the supplier shows a high ESG risk, they will undergo a specific evaluation focused on the E, S or G variable (or a combination of all three variables) that was identified.
- Streamlining the registration and validation procedure for suppliers without ESG risks and below the €400,000 threshold. This helps cut down the amount of questions asked to complete the supplier's registration by up to 75% by using technology and checking over 160 databases.
- Monitoring of possible negative information on all the suppliers through new Artificial Intelligence (AI) technology.

ACCIONA's goal within the SMP framework is to deploy this methodology gradually until it extends to all suppliers by 2025.

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SCRM: new model to manage supply chain risks and opportunities with ESG



The new model, approved in 2022 and to be deployed gradually until 2025, is based on the GRI standards, adding to its supplier database a new ESG risk variable besides the sales volume element to control risks and opportunities. This means that suppliers with small contracts but high ESG risk will also be evaluated thoroughly with a view to implementing improvement plans.

Otherwise, these suppliers will be listed on the No-Go Suppliers list, as these policies have been adapted to the new model, strengthening the social safeguards. This new model also monitors reputation on the media of every supplier through AI technology instead of only focusing on critical suppliers.

So far, the supplier figures reported at the last Steering Committee (late 2022) on the pipeline of the new supply chain model are:

- 42,647 suppliers pre-segmented through the new ESG risk variable.
- 26,773 suppliers with new real-time monitoring of social media, increasing this number by 7,000 new suppliers every month.
- 22,128 suppliers with Risk Map completed with this new methodology (41.8% of the database, whereas ACCIONA's commitment announced in the 2021 Report was 15%).

With this new model, ACCIONA is equipped with a standard methodology that is adapted to the new regulations, including the Directive on Corporate Sustainability Due Diligence (CSDD), Modern Slavery Act (UK and Australia), UK Bribery Act, GHG Protocol and GRI standards, among others.

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TARGET SMP 15-20	KEY PERFORMANCE INDICATORS				TARGET SMP 20-25
Extend the scope of the supplier risk map	97% national suppliers and 75% international suppliers, critical Own Construction with Risk Map KPI: 99.5%; 76%	More than 80% of critical suppliers in Own construction validated & >90% registered in PROCUR-e with Risk Map KPI: 83%; 94%	More than 85% of critical suppliers in Own construction validated & >94% registered in PROCUR-e with Risk Map KPI: 93.3%; 93%	Keep up the percentage of critical suppliers in own construction that must be validated.	95% critical suppliers in own construction validated
In-depth look at Supplier Risk Map	Measure over 90% of validated suppliers in the year with this variable analysed KPI: 98.6%	Measure over 95% of validated suppliers in the year with this variable analysed KPI: 96.3%	<ul style="list-style-type: none"> Go Live new methodology enhanced assessment, segmentation and ESG improvement 15% suppliers Registered with visibility Risk Map, Improvement Plans and ESG classification KPI: Go Live; 41.8%	<ul style="list-style-type: none"> Continue to deploy the Improvement of the Supplier Risk Map through the new SCRM methodology 60% of suppliers will have ESG evaluation, monitoring and improvement plans. 	100% suppliers will have visibility of their Risk Map, reinforced control and access to Improvement Plans to mitigate their ESG risk and classification
Development and implementation of No-Go policies	0% of orders to No-Go suppliers KPI: 0%	0% of orders to No-Go suppliers KPI: 0%	0% of orders to No-Go suppliers and reinforcement in social safeguards KPI: 1 supplier, New release of No-Go Policies	0% orders to No-Go suppliers and new release of the Sustainable Procurement Guide and review of its criteria	0% of purchases from No-Go Suppliers and keep policies updated
<div> <div>...</div> <div>2020</div> <div>END OF CYCLE</div> <div>2021</div> <div>2022</div> <div>2023</div> <div>...</div> <div>2025</div> </div> <div> 100% complete Incomplete In progress </div>					

Degree of fulfilment of the objectives of the supply chain

Challenges for 2023 in supply chain management

1. Continue to deploy the improvement of the Supplier Risk Map through the new SCRM methodology. 60% of suppliers will have ESG evaluation, monitoring and improvement plans.
2. Creation of the pilot for Scope 3 Measurement with revised methodology for at least two of the strategic procurement categories.
3. Maintenance of the percentage of critical suppliers in own construction that must be validated.
4. New release of the Sustainable Procurement Guide and review of its criteria.

These targets are applied to all ACCIONA, except for ACCIONA Energía, whose targets are also aligned but are adapted to their particular circumstances.



More information: [ACCIONA Energía's Non-financial Information Statement 2022](#).

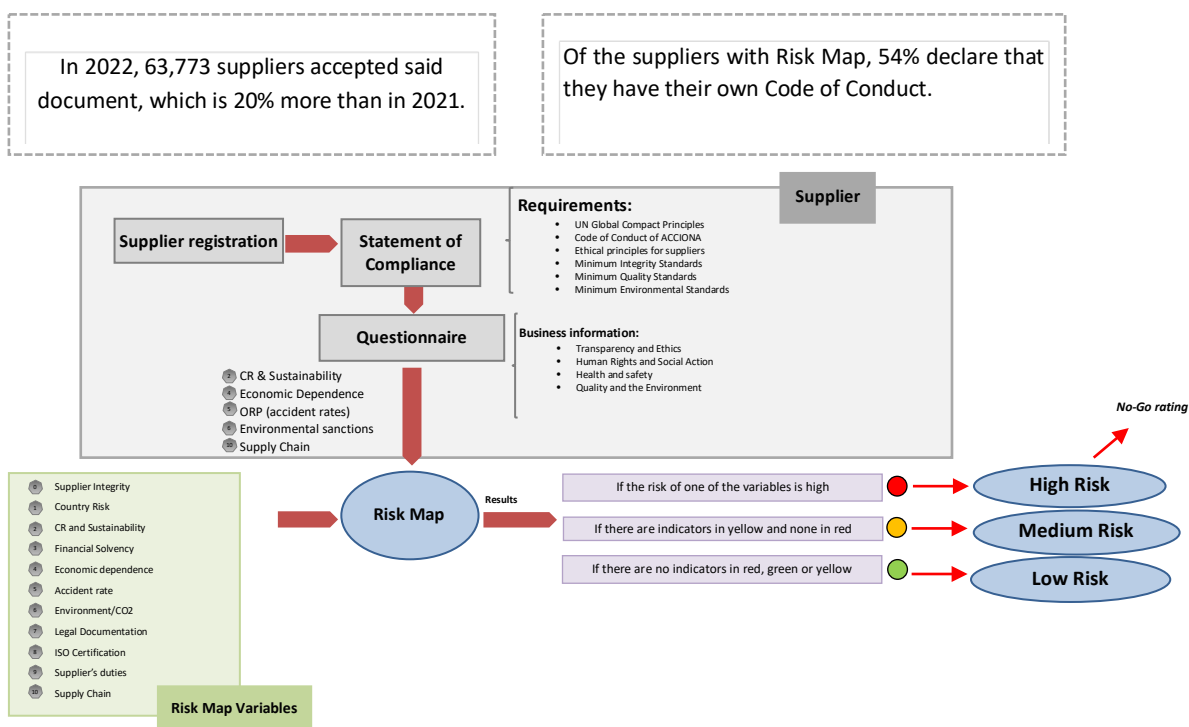
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Elements of the Control System in the supply chain in 2022

Statement of Compliance

ACCIONA extends the dissemination of company's ethical principles to its supply chain as essential to consolidate a network of suppliers, contractors and partners in line with its corporate values.

Through its portal and the PROCUR-e tool for tenders, as well as the general terms and conditions in contracts, all suppliers must accept a document that includes, among other things, the ethical principles for suppliers, contractors and partners, the code of conduct and the minimum requirements in terms of integrity, quality, environment, information security and personal data protection.



Risk Map

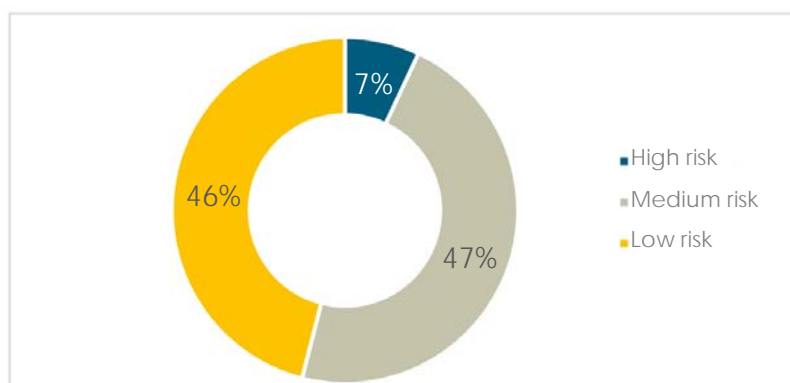
The Risk Map is ACCIONA's primary supply chain risk control and management tool. Through this mechanism, the company informs all its suppliers about its criteria and policies on the subject of corporate responsibility and sustainability.

A supplier's Risk Map is made available prior to contracting. At present, the Map consists of eleven variables: ESG, ethics, integrity and financial solvency, among others. The percentage of the scope of the Risk Map and control increases as the supplier's criticality level rises. This assessment of the Map Risk is verified in the approval and on-site audit processes.

The supply chain management model aims to evolve not only towards detecting the risk, but also to develop suppliers' weaknesses, to align them with the group's policies and position them as best as possible.

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Distribution of the risk of all suppliers registered in PROCUR-e:



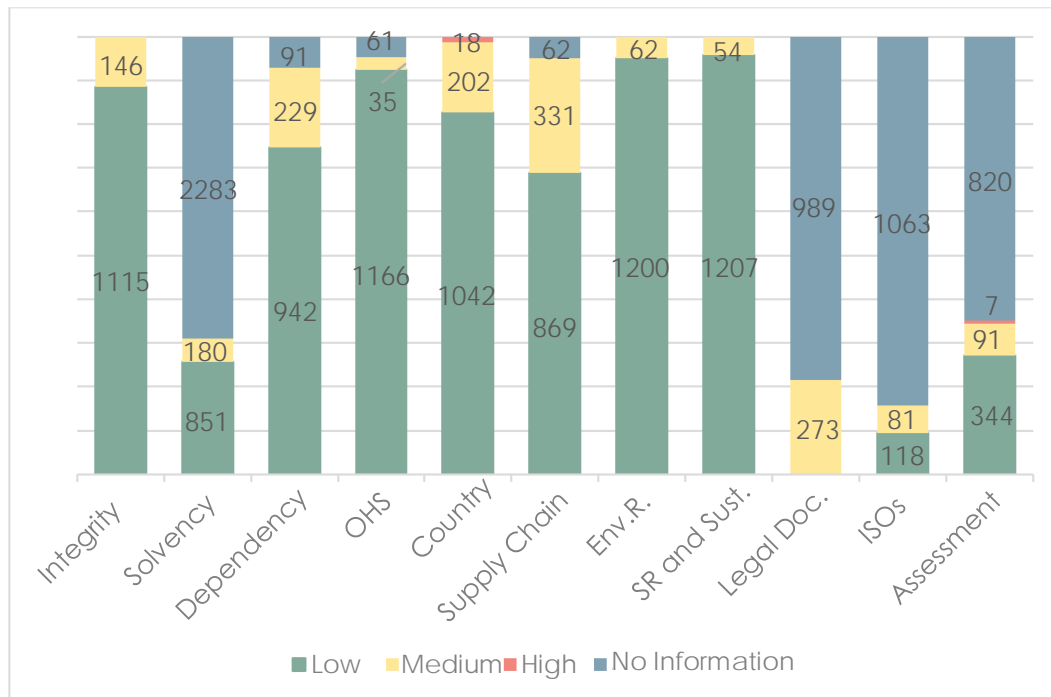
The percentage of critical suppliers in own construction who were validated in 2022 is 94.2%, which means an increase of nearly 8 points compared to 2021. As for the Risk Map, 93% of suppliers are registered in PROCUR-e. The other 7% have accepted the Statement of Compliance, but failed to complete their registration and, therefore, were unable to take part in tenders.

The critical suppliers with Risk Map who work in own construction (works controlled by ACCIONA) in 2022 amounted to 1,319, making up 97% of the total expenditure.



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Distribution of the variables of the Risk Map in critical suppliers in own construction



Conclusions of the Risk Map:

- The distribution or level of risk has remained stable with respect to previous years, as 93% of suppliers have an average/low risk level.
- The supply chain risk analysis model has been further consolidated, with greater visibility and scope. 20% more suppliers with Risk Map, which translates into 59,223 businesses monitored on a daily basis.
- In 2022, the Risk Map for suppliers covered:
 - 89% of total contracts.
 - 91% of contracts with critical suppliers.
 - 97% of contracts with critical suppliers in own construction.
- As in previous years, there is no supplier with a high-risk integrity variable that has not been considered No-Go, since there are only two possible options for this type of business: avoid hiring them or conduct a Reinforced Due Diligence process that mitigates its risk.
- 54 critical suppliers with Medium Risk in corporate responsibility and sustainability were detected and the company will work with them to reduce their risk over the course of 2023.

Validation:

To be awarded a contract for an aggregate amount above €400,000 at group level (considered critical suppliers), the supplier requires this extra control where we verify the evaluation of the Risk Map with a Reinforced Due Diligence.

In 2022, the scope of validated critical suppliers in own construction includes 1,164 companies out of a total of 1,236 identified, translating into a ratio of 94.2% that exceeds the 88% target.

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Improvement plans for the validation process

In 2022, 95 of the suppliers evaluated during the validation process revealed a risk in ORP. All of these suppliers were offered an improvement plan, which means we met the challenge set for the year. After the analysis, 59 suppliers signed up for an improvement plan and 17 are still in time to do so but will lose their validation status if they fail to solve the issues. All other 19 suppliers lost their validation at the end of the deadline to sign up for the Improvement Plan.

Of the 4,013 validated suppliers, 156 have signed up for improvement plans for occupational risk prevention.

Of the validated suppliers, 1,998 required an additional assessment of their financial risk, either because this information was not made public or because they presented a solvency risk. At year-end 2022, two suppliers had a significant risk in this variable, so extraordinary control measures were established in coordination with the financial department.

However, no environmental risks have been detected in any of the suppliers that have required validation. The information related to suppliers with risk in human rights is dealt with under the section "Human rights assessment".

Supply Chain variable and non-tier 1 suppliers

ACCIONA uses the Supply Chain variable to determine whether suppliers identify, monitor, assess and offer room for improvement in their supply chain. In 2022, the objective was to analyse this variable for more than 90% of the validated suppliers in PROCUR-e, but the figure has now reached 99%.

In addition, although ACCIONA does not have a direct contractual relationship with its suppliers' supply chain, it is aware of its duty to supervise all its agents. In this context, the company considers non-tier 1 distributors (suppliers of its suppliers) that carry out work in its facilities and projects to be critical from a health and safety point of view. In 2022, 6,329 were registered in Obralia and 1,303 in TDOC. This supervision is regulated through contractual clauses during the relationship with this kind of suppliers and of the specific tools for the coordination of business activities.

Focus on the Integrity variable

The Integrity variable analyses the supplier's position with respect to matters like money laundering, tax havens, corruption lawsuits and presence on international sanction lists.

This variable was monitored for 4,013 suppliers by the end of 2022, which is 75% of the year's contracts and 19% more than in 2021. ACCIONA monitors the most important companies, whether for certification reasons, or because the company is one of ACCIONA's main agents, or because the company is recurrent, or working in a risk country.

In addition, there are 22 suppliers with significant risk in the Integrity variable. Out of these, one has been removed from the platform, twelve have No-Go status and three have been set as Not Valid, which means they cannot work with ACCIONA. The remaining cases are still under investigation and the necessary actions will be taken in 2023. In 2022, 12 due diligence processes were conducted with suppliers, mitigating their risk in this variable.


No-Go Suppliers

The No-Go Policies outline all the minimum requirements on ethics and integrity, corporate responsibility and sustainability, financial solvency and performance that the partner and/or supplier must meet. If these are not met, the company cannot be hired by ACCIONA Group unless they solve the issues behind that status.

In 2022, a new draft of these policies was published strengthening the criteria for social safeguards. 193 suppliers were considered No-Go in 2022, 35 of which have changed this status following the implementation of audits or action or improvement plans, or an enhanced due diligence.

The first case of hiring a supplier with No-Go status was detected in 2022 and this triggered the Action Plan. An extraordinary Validation Committee was called and the supplier was re-audited by ACCIONA's own staff and a third party, coming up with an Improvement Plan that was proposed to the supplier to repair the non-compliances that led to said status.

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Supplier performance assessment

Evaluating a supplier in a project is crucial to truly know how the supplier performed in its business relationship with ACCIONA.

In 2022, we continued to assess suppliers in relation to deadlines, occupational risk prevention, quality, environment, fulfilling administrative duties and technical skills. More than 9,400 order evaluations were carried out on hired suppliers. 96% of those evaluations were type A or B (very recommendable or recommendable supplier).

On-site Audits

The maximum level of control, which involves on-site audits, is for MACS suppliers in risk countries.

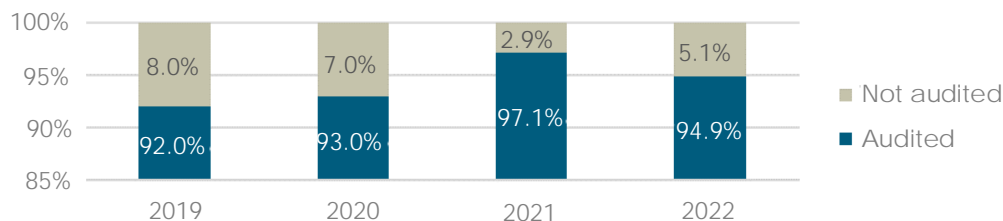
Nevertheless, ACCIONA conducts audits for several reasons to other non-MACS suppliers: other critical suppliers, recurrent suppliers or due to strategic decisions.

Since 2013, 2,421 audits have been conducted by international expert firms and local auditors with local knowledge of the country, in accordance with a standard protocol that not only examines aspects relating to ESG, but also issues related to finances and quality.

In 2022, 171 audits were conducted: 170 audits on direct suppliers and one on non-tier 1 suppliers, despite the restrictions imposed on free movement, especially in China due to COVID-19.

By year-end 2022, 671 suppliers had undergone audits that remained up-to-date. The number of accumulated processes has dropped due to our bigger efforts for these on-site verifications in risk countries (MACS audits), where there is a greater likelihood of human right, environmental, social or other violations.

Evolution of MACS audits



In 2022, 48 MACS audits were conducted in China, Saudi Arabia, United Arab Emirates, India and Turkey, which is 11.6% more than in 2021.

48 of these audits verified suppliers' compliance with the minimum requirements in areas relating to human rights, health and safety, quality and the environment, as set out in the *Guidelines for Minimum Sustainability Checks during Onsite Visits*. No non-compliance cases in these areas were detected in any of the visits carried out.

Moreover, one of the 2025 SMP goals is to audit 90% of critical suppliers in own construction in risk countries (MACS). The company once again achieved this target in 2022, as 94.9% of these suppliers are currently audited.

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Resolution of serious non-conformities

ACCIONA works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. They do it by means of action plans. In the event that the deficiencies detected cannot be resolved within a reasonable period of time, the company is marked as No-Go.

Focussing on the Non-Conformities of the 170 direct suppliers audited in 2022, the following is worth noting:

- 43% had zero SNCs, similar to last year.
- The remaining 57% signed up for the various action plans. Of this percentage, 46% have fully resolved their SNCs and the rest are still in time to do so or have been marked as No-Go suppliers.

With regard to suppliers in risk countries (MACS), out of the 48 suppliers audited:

- 19% had zero SNCs.
- The remaining 81% have implemented various action plans. 11.4% have been resolved and the rest have either been changed to No-Go status or were on schedule.

As in previous years, the highest number of SNCs occurred in the areas of Health and Safety and Quality, while Human Rights once again accounted for the third highest number of SNCs. These are the areas in which the greatest effort to implement improvement plans is made.

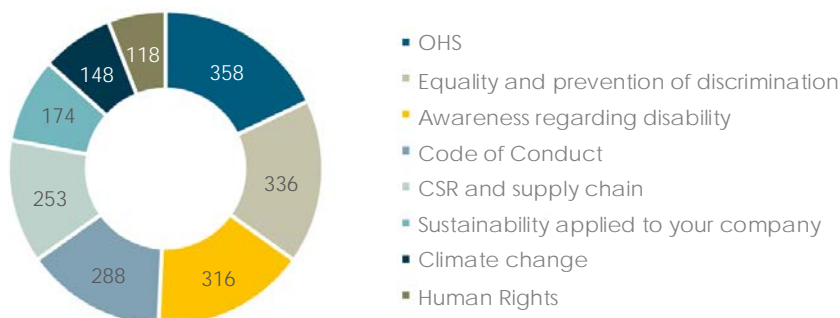
ACCIONA Energía is aware that insisting on the resolution of the Non-Conformities detected during audits is the correct path to help its distributors to improve as companies and mitigate the risks associated with the supply chain.

Training and communication with suppliers

The ACCIONA Corporate University Supplier Campus is integrated into PROCUR-e and is available to 100% of the supply chain for free, having updated and enhanced the platform this year. Throughout the last financial year, 631 suppliers (11% of the total contracted), were interested in receiving training courses out of those offered on the campus. The courses that have aroused the most interest in recent years are:

1. **Occupational Health and Safety (OHS):** allowing suppliers to acquire the necessary tools to mitigate risk in this area.
2. **Code of Conduct:** suppliers learn the basic concepts of rules and how to apply them internally.
3. **CSR:** helping to better understand Corporate Social Responsibility.

Training for suppliers 2022



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Communication with suppliers

Suppliers have two-way channels to raise matters in relation to their commercial relationship with ACCIONA:

Likewise, suppliers can make use of the Ethics Channel to report any irregular practice detected, which will be duly analysed by the company.

Incentives for sustainable products

Besides its Sustainable Procurement Guide, available to all its suppliers and to be revised in 2023, ACCIONA has fostered the following initiatives in 2022:

1. Measure what is important:

This programme was completed successfully in 2022. It was designed to raise awareness and guide selected supplier SMEs along the process of knowing, measuring and improving their sustainability. Entirely subsidised by ACCIONA, 86 companies completed this programme.

As part of ACCIONA's feedback and reward philosophy, the companies who completed the programme were added to the Preferential Bidders List (PBL) in the corporate tenders system of PROCURE-e, and gained free access to 100% of the courses.

The Tenders tool on PROCURE-e identifies and promotes the suppliers on the PBL, which means they will be the first to be invited to tenders as top performers in ESG.

In 2022, all of these suppliers were given priority and entered into the new SCRM model described above.

2. Programmes on sustainable development with strategic suppliers through the Category Managers:

ACCIONA has shrunk its carbon footprint by 37% in two building projects in Spain by using state-of-the-art low-emission eco-friendly concrete and steel. These projects consist of the building of a state-owned school in Torrevieja (Alicante) and a quay for submarines in a military base (Arsenal Militar) in Cartagena (Murcia). In these projects, ACCIONA expects to prevent the emission into the atmosphere of nearly 980 tonnes of carbon dioxide (CO₂).

ACCIONA has acquired a handler and two electric dumpers to check their operating efficiency on site. The goal was to obtain knowledge and experience in the use of these machines, cutting down the CO₂ generated in the operations.

Sustainability criteria in procurement and contracting management



Eco-efficient vehicle fleet

The operating fleet for executives consisted of 407 vehicles in 2022, of which 183 have emissions below 120 gCO₂/Km. 100% of the cars have EURO6 engines, 40.8% are hybrid vehicles, and 3.4% are electric vehicles, which means lower CO₂, NOx and

As for the service fleet, ECO or zero-emission vehicles increased by 226% in 2022, with 562 electric, hybrid, microhybrid and LPG/CNG vehicles now available, which brings down the average emissions of the fleet by 6% compared to 2021.



Renewable materials

3,066 tonnes of wood with chain of custody certification (FSC, PEFC, or similar) were purchased.



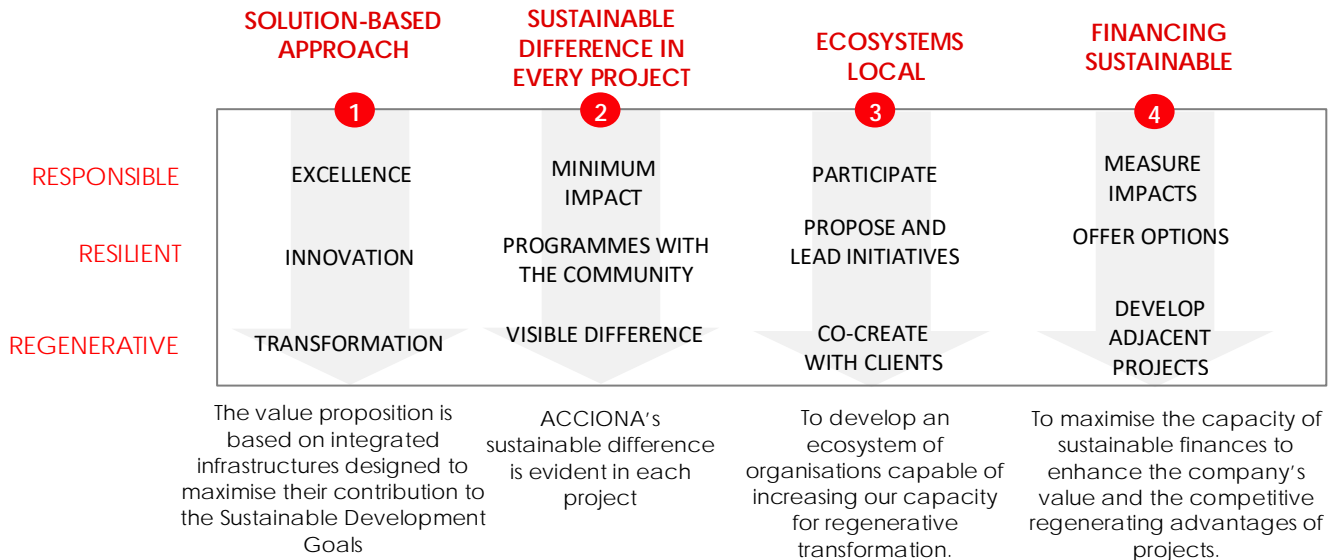
Contracting through Special Job Centres

The contracts through 12 Special Job Centres promote the incorporation of people with disability into the job market. The expenditure amounted to almost two million euros over the year and the company made donations worth €260,000.

Integrate to transform

Difference in every project

ACCIONA has the capacity to create a unique sustainable difference with a portfolio of solutions aligned with sustainable transformation.



KEY MILESTONES 2022

- > Creation of a "Regenerative Playbook" (guide) to standardise the process for the development of regenerative differences across all the company's actions.
- > Closed the MacIntyre funding for over €1,000M. Two funding instruments were combined (a green one and a sustainability-linked one) that contribute to the sole goal of local impact.
- > Entered the Dow Jones Sustainability World Index made up of world leaders in sustainability.
- > 24% increase in the number of projects with Social Impact Management.



MAIN CHALLENGES 2023

- > Disseminate the contents of the "Regenerative Playbook" among employees to raise awareness and teach the company's values.
- > Launch a new Funding Framework that helps highlight ACCIONA's impact approach.
- > Approve the policy on relations with stakeholders.
- > Approve and implement the Social Impact Management+ (SIM) methodology.

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SOLUTIONS-BASED APPROACH

The value proposition for this area of the 2025 Sustainability Master Plan is based on boosting the integrated infrastructures to maximise their contribution to the Sustainable Development Goals (SDGs). The various divisions of the company work together to design and offer their customers solutions that advance the achievement of the SDGs to the greatest possible extent.

Social Impact Management+

In 2022, the company worked on updating the Social Impact Management methodology. This update resulted in the Social Impact Management + methodology, which will be implemented in 2023. With this new methodology we aim to develop distinctive actions to efficiently mitigate the risks and boost the regenerative impact on projects. The company's social strategy has evolved focusing on the following milestones:

- Applying an approach based on human rights, aligning the social impact management with the due diligence system for social safeguards.
- Adapting solutions to the context and place where ACCIONA develops its projects, focusing on understanding the local context from the very start of the project.
- Incorporating distinctive social capacities aligning the project potential with the gaps identified locally.

ACCIONA considers Social Impact Management + as a process to identify, analyse and manage the social consequences arising from its projects, as well as reducing social gaps in the area of influence of those projects. This methodology seeks to place stakeholders at the core of its decisions and build alliances to maximise the impact of its actions.

ACCIONA, through this new methodology, has developed tools for local analysis and diagnosis that allow it to identify risks at an early stage and also anticipate opportunities, incorporating the local evaluation of the progress made with the Sustainable Development Goals. This new focus allows the company to plan time-centred distinctive social initiatives that are based on the local context.

Likewise, the company has worked on updating the Corporate Standard on Communications and Dialogue with the Communities and Other Stakeholders to encourage relations based on the commitment to constantly communicate, dialogue and participate with communities and other stakeholders to generate shared value and build long-term relationships.

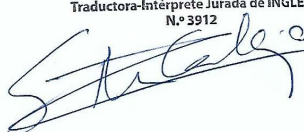
The Social Impact Management + Corporate Standard for projects, along with the Corporate Standard on Relations with Communities and Other Stakeholders, are the procedures set in the guidelines to maximise social performance in ACCIONA's projects and services.

Social Impact Management (SIM+) methodology

The Social Impact Management fundamentally consists of two phases:

- Bid phase:
 - 1. Defining the scope of the Social Impact Management:** identifying the area of direct and indirect influence based on the location and environment features.
 - 2. Identifying the social risks and gaps through on-site visits:** depending on the importance of the project or service, visits are made to the area of influence of the project in order to get a deeper insight into the local context of the place where ACCIONA operates.
 - 3. Specifying social risks and gaps and budget allocation:** identification and assessment of the social risks and gaps based on the project location. These are specified by analysing more than 70 ESG indicators plus manual validation from ACCIONA's employees involved in the study. The specification includes 19 indicators to manage human rights, including the right of indigenous peoples. The budget allocated to manage the social impact will depend on the estimate of each risk and gap.

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4. **Classifying the project:** the project is classified based on the tender budget and the result of the risk and gap appraisal. Based on this classification, the methodology will serve as a guide towards mitigating and preventing risks or reducing social gaps in the project area of influence, or both.
- Execution phase:
 1. **Social assessment of the project:** analysis of the details of the project area of influence, identification and assessment of positive and negative social impacts and social gaps, if any, and proposing social initiatives.
 2. **Relations with the communities and other stakeholders:** engagement and participation with the community and stakeholders in managing the social impact of the project or service.
 3. **Designing social initiatives and seeking alliances:** defining the most suitable social measures to manage the impacts caused by the project or service and seeking local alliances to develop the appropriate social initiatives.
 4. **Implementing and monitoring initiatives:** starting the initiatives defined and measuring their impact.

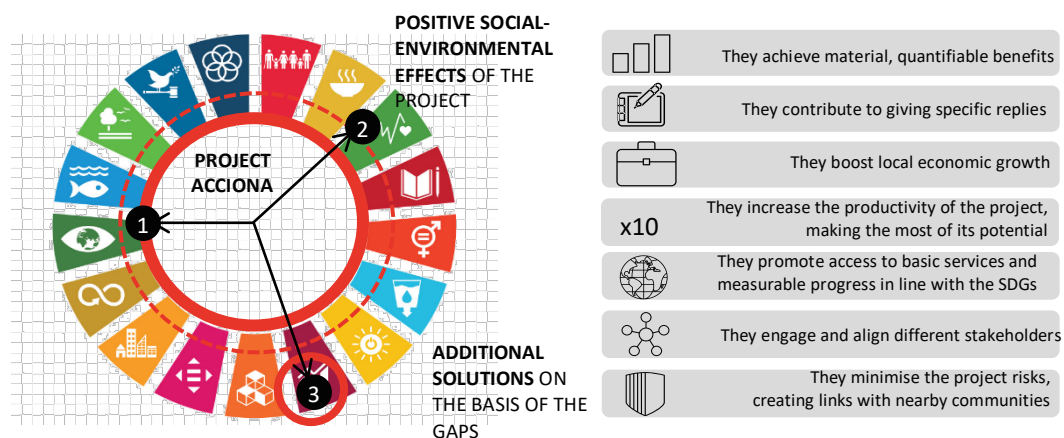
SUSTAINABLE DIFFERENCE IN EVERY PROJECT

High impact solutions

ACCIONA aims to demonstrate the sustainable difference in each activity it undertakes. The business lines, and especially the projects, develop their own distinctive identity of a regenerative/sustainable nature during execution, which are recognisable by third parties.

To do so, the company seeks to enhance the transformative effect of its projects by maximising the impact they generate in terms of local impact, return on investment and acceleration of sustainable development. To this end, it has designed the High Impact Solutions, which, through the creation of adjacent benefits, contribute to improving the living conditions of the people and/or the environment and the area surrounding the company's projects.

Benefits of High Impact Solutions



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According to certain papers by experts, infrastructure development is directly or indirectly linked to the achievement of 72% of the Sustainable Development Goals⁸. In fact, the company's High Impact Solutions approach helps to channel the necessary investment towards projects that promote the global sustainability agenda.

ACCIONA acts directly on social or environmental gaps identified in the immediate vicinity, such as gender equality and inclusion of disadvantaged groups, entrepreneurship, lack of access to basic services such as water, energy or telecommunications, the regeneration of ecosystems and other areas. The goal is to boost an inclusive and integrated economic growth wherever it operates. Indeed, projects to create additional benefits have been designed to provide a sustainable service over time, either through their development as new business models or through partnerships with third parties to ensure their long-term operation and maintenance.

YOUTH COMMITTEE

So as to disseminate the Integrate to Transform principle, a Youth Committee was created by the Knowledge Applied to Business (KAB) and Innovation team in the Infrastructure Division, to include young people's opinion in the company's decisions. This was the third year the event was held.

The Youth Committee brings a different view on how to tackle strategic challenges, providing solutions to problems that are increasingly interconnected. It is made up of young professionals who carry out different roles and are in different businesses and countries.

Besides promoting the initiatives in the pipeline, the Youth Committee proposes new solutions through intrapreneurship with the so-called "Tower of ideas". Each member proposes a strategic challenge to a panel of executives. Out of this pool of challenges, the panel chooses three for which the Youth Committee must design a solution.

Also, the Youth Committee has worked identifying challenges and advising different teams through conversations and workshops on different matters, including diversity, sustainability, social impact, innovation and young talent.

Work tools

In order to implement the High Impact Solutions, the company has established a series of tools and teams:

- **Catalogue of solutions:** in order to standardise and facilitate the development of High Impact Solutions, ACCIONA compiled a register, which details additional projects already described and develops new ones based on the knowledge and experience acquired through the group's business. This *know-how* can be applied to other projects generating synergies that heighten their net positive impact.
- **Work teams:** these integrate the corporate sustainability function, the departments of business sustainability, the areas of research and engineering, the local teams for each project and the innovation centres. Their purpose is to develop and introduce solutions backed up by the experience of the group and the cross-sectional knowledge of the team members.

The development of High Impact Solutions requires the creation of a collaborative environment with a network of project partners and stakeholders taking an active role in carrying out and operating additional projects: multilateral development banks and impact and innovation funds, NGOs, cooperation agencies, public administrations and other foundations, community representatives and local companies.

⁸ Thacker, Adshead, Fay et al. (2019) "Infrastructure for sustainable development". Nature Sustainability 2, 324–331. <https://doi.org/10.1038/s41893-019-0256-8>

High Impact Solution Methodology

ACCIONA has a process for evaluating the potential of including this type of solution in a project, which can be initiated at any stage, not only in the initial phase of identifying a business opportunity. The process is divided into the following stages:

1. Project identification.
2. Diagnosis of social-environmental gaps in the immediate area surrounding the project.
3. Consultation with local experts.
4. Communication with investment agents and external partners.
5. Definition of solutions and completion of financing.
6. Implementation of the adjacent solutions proposed.
7. Measurement and management of the impact generated.



WWTP Atotonilco, Mexico:

Free programme to boost long-term employment locally and reduce employee turnover at the treatment plant, whilst also promoting gender equality in technical profiles since half the participants were women.

The programme consisted of six months of theoretical and practical contents which ended with financial aid and a certificate from the Mexican Institute of Water Technology (IMTA).

The programme was developed together with local authorities and communities.

LOCAL ECOSYSTEMS

In order to implement the methodology to develop regenerative infrastructures, it is key to develop an ecosystem of local organisations who are willing to realise the regenerative transformation potential of local contexts. Along these lines, we establish dialogues with third parties to develop work programmes, initiatives and cooperation projects that will multiply the company's capacity for developing regenerative solutions.

Social Impact Management and relations with stakeholders

Development of local communities			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Significant	<ul style="list-style-type: none"> Loss of market share Lower revenue 	<ul style="list-style-type: none"> Higher asset valuation Revenue increase
	Important	<ul style="list-style-type: none"> Loss of market share Lower revenue 	<ul style="list-style-type: none"> Higher asset valuation Positioning against a bigger regulatory burden
ACCIONA's average: important			

ACCIONA considers the social management of its projects and services as one of the strategic matters in its sustainable business model. The company understands Social Impact Management (SIM) as a process of identification, analysis and management of social consequences, intentional or otherwise, both negative and positive, derived from a project or service in a community.

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For over ten years, ACCIONA has relied on its own social impact management methodology, based on international standards⁹, adapted to the different businesses and geographical contexts. This methodology is a distinguishing element that significantly contributes to minimise negative impacts and maximise positive ones, and to improve relations with communities and other stakeholders. With its own SIM methodology it can know and manage the concerns and expectations generated by ACCIONA with its business, through communications and dialogue with the communities.

The Corporate Standard on Social Impact Management for Projects, along with the Corporate Standard on Relations with Communities and Other Stakeholders, are the procedures set in the guidelines to manage social performance during the life cycle of a project or service.

Social Impact Management (SIM) methodology

Social impact management fundamentally comprises four phases:

1. **Specification of the social risk and budget allocation:** study on the level of social risk in the project right from the bidding phase and, depending on the level of risk, allocation of a budget to manage the social impact of the project in the future.
2. **Social assessment of the project:** analysis of the socio-demographic and economic specifics of the project area of influence and assessment of positive and negative social impacts that are inherent to the project, and drawing up of a proposal for social initiatives.
3. **Communication and dialogue with the communities and other stakeholders:** identification and communication with local communities and other stakeholders to inform them about the project, its main impacts and social initiatives.
4. **Implementation and follow-up of initiatives:** launch of the initiatives to strengthen the positive social impacts and avoid or mitigate the negative ones.

In 2022, the Corporate Standard on Social Impact Management was implemented on 253 projects (24% more than in 2021) in 28 countries. The number of initiatives designed and implemented is 780, thereby benefitting 370,282 people.

The main adverse impacts caused by the projects with Social Impact Management in 2022 include: involuntary resettlements; noise, odour and water pollution and particle emissions; the deterioration of roads and temporary impact on infrastructures and basic services. On the other hand, the development of the projects generates numerous positive impacts, including the acquisition of goods and services in the project area of influence; the hiring of personnel taking into account proximity, diversity and inclusion or the improvement of the people's standard of living.

ACCIONA's specific methodology helps anticipate the identification, evaluation and management of these impacts. Depending on the final appraisal of those impacts, the methodology will require the establishment of priority activities for the impacts rated as high. The initiatives adapt to the territory where the project or service takes place, including varied activities like:



L6 underground in Sao Paulo, Brazil: micro-entrepreneurship initiatives with a gender equality approach to boost vulnerable women's income and employment.



Marga Marga Hospital, Chile: soundproofing project to improve the infrastructure and well-being of the people in the project area of influence.



Hamad Medical Corporation, Qatar: fun leisure activities to foster cohabitation between workers.


⁹ IFC performance standards on environmental and social sustainability, Guidelines for Environmental & Social Impact Assessment (ESIA) WBCSD, Guidance for assessing and managing the social impacts of projects (International Association for Impact Assessment), The Equator Principles, World, Bank Environmental and Social Framework.


Social initiative in EDAR Pachacutec, Peru.


In 2022, after implementing the Social Impact Management (SIM) methodology, the project launched the “I clean Pachacutec because I love you and the environment” initiative given the presence of solid waste on roads that caused the proliferation of vectors, foul smells as well as water, soil and air pollution in the project area of influence.


ACCIONA gave out community modules to separate solid waste which had been made by the personnel who works on the PTAR Pachacutec project. To make these modules, the employees mostly used spare materials, recycling them and giving them a second life for the benefit of the Pachacutec communities, in order to contribute to improve their quality of life as part of a circular economy and sustainable development. The settlements chosen were Oasis, Laderas del Cerro Cachito, Mini Parque Industrial, Cerro Cachito and Sol y Mar, whose community leaders received the modules and promised to maintain them regularly and separate the waste into the right bins.


Likewise, ACCIONA establishes channels and activities to take care of the concerns and expectations shown by stakeholders. For 74% of its projects, the company has different communication channels including websites, web forms, e-mails, phone numbers, suggestion boxes, regular meetings and customer service offices for the local community. Through these, the stakeholders affected by a project can share their queries, complaints and suggestions. Some examples are:

 **Pan-American Road, Panama:** plan to provide advice and follow up the project with the stakeholders affected with a view to taking care of their concerns and/or expectations through communications and dialogue.

 **Panta Maranta IV, Mexico:** special communications plan for the neighbours to handle the occasional disruption that our business may cause.

 **Drinking water treatment plant Ing. Jose García Rodríguez, Panama:** meetings with the community leaders who share the community's concerns, contributions and suggestions on the project and its needs.

 **Broadway Underground, Canada:** all-round communications plan to handle nonroutine incidents.

 **EDAR Nhieu Loc, Vietnam:** survey on employees' well-being.

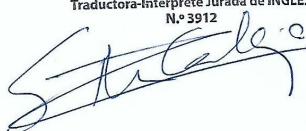
Social initiative on the Pan-American Road project, Panama.

During the execution of this project, through the Social Affairs Plan, we contributed to improve relations with the stakeholders in the project area of influence. We have identified over 90 groups of this kind between communities, municipalities, user meetings and diverse institutions, that were benefitted through the different social sub-programmes.

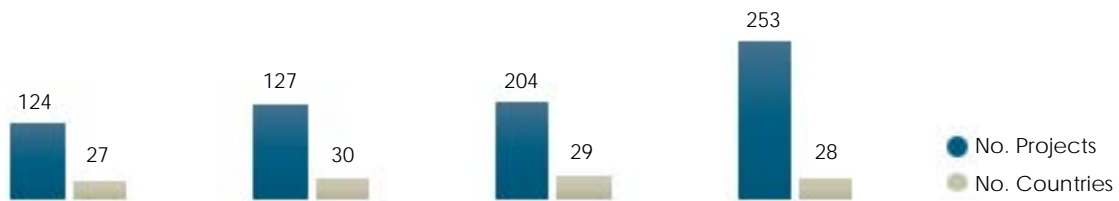
A programme for citizen participation has been implemented with nearly 500 activities to inform more than 800 participants. This includes visits to authorities, on-site information workshops and meetings coordinating the different stakeholders. Also, 464 houses were identified during the blasting process, where we are in constant contact with the citizens and authorities to minimise negative impacts.

All collaborators receive instructions on social affairs and the code of conduct. This has meant a greater social awareness in the project area of influence, as shows in the lower number of complaints and claims by the parties concerned.

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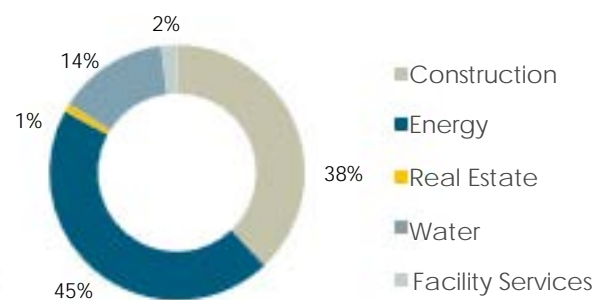
Evolution of the importance of the Social Impact Management (SIM) methodology



Countries with projects with SIM



Distribution of projects per business



DESIGN

CONSTRUCTION/OPERATION

DEFINITION OF SOCIAL RISK

PHASE IMPLEMENTED

93%

SOCIAL ASSESSMENT OF THE PROJECT

PHASE IMPLEMENTED

91%

COMMUNICATION AND DIALOGUE BETWEEN COMMUNITIES

PHASE IMPLEMENTED

70%

IMPLEMENTATION AND MONITORING MEASURES

PHASE IMPLEMENTED

76%

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Audits on the use of the SIM methodology

External audits assess the level of implementation of the SIM, checking compliance with the Corporate Standard on Social Impact Management in the projects. The process includes the results of specifying the social risk, the analysis of socio-demographic characteristics in the project area of influence; the identification and assessment of social impacts –positive, negative, real or potential– derived from operations in certain projects and services; the matching of the social measures proposed with the priority impacts; the identification of stakeholders; and communications and dialogue. The scope of the audits also covers the following criteria and relevant aspects related to best practices:

- Analysis of criteria and relevant aspects under the SA 8000:2014 International Standard, choosing which of them are covered in the projects and which could be included to facilitate their application.
- Analysis of the Matrix Outcome tool of Big Society Capital to identify the areas and beneficiaries on which the activity has an impact.
- Analysis of the safeguards established by the European Taxonomy. These guarantees are based on OECD Guidelines on multinational companies, the UN Guiding Principles on businesses and human rights and the fundamental conventions of the International Labour Organisation (ILO).
- Analysis of the *Guide to Human Rights Impact Assessment and Management*¹⁰ to ascertain the potential and/or existing risks and impacts on human rights in the projects and to determine the ability to manage them.

Evolution of the Social Impact Management audits

	2019	2020	2021	2022
Total no. of audits	8	7	8	7

They concluded that the methodology is being implemented correctly in every phase. In 2022, the audit reports highlighted ACCIONA's effort in improving the analysis of the local context of the project area of influence as well as the establishment of social initiatives for every impact, negative or positive, identified and assessed. They pointed out the initiatives implemented by ACCIONA for the hiring of local manpower with gender equality in mind and the practices focused to encourage stakeholder participation from setting priorities and evaluating them to communicating them.

Commitment to the community

ACCIONA understands its role as a major player in the economic development of the communities in the countries where it operates as well as a driver to improve people's quality of life. This commitment has translated into the following results:

- Over €14.2M in social investments in the community.
- Over 2 million beneficiaries of the various social initiatives carried out.

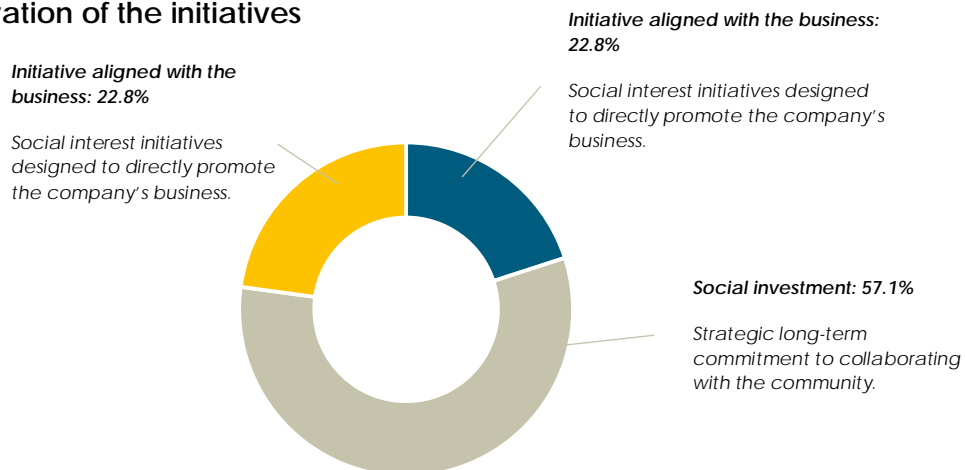
These activities, implemented in 28 countries, contribute to people's well-being, by widening their access to education, encouraging sport and healthy lifestyle, and promoting the conservation of their heritage and care for the environment and biodiversity. They also focus on job creation by training workers and promoting local businesses. Improving community infrastructure is another of the company's social action objectives.

¹⁰ Guide drawn up by the International Business Leaders Forum, IBLF and the International Finance Corporation (IFC) in association with the United Nations Global Compact Office.

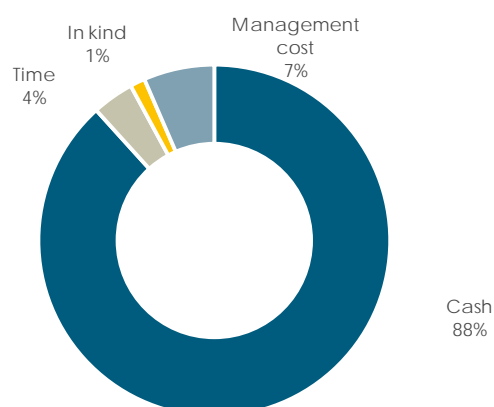
Measuring investment in the community

ACCIONA measures and evaluates its investment in the community and the degree to which it contributes to the 17 Sustainable Development Goals, which enables the overview and comparison of results with other companies.

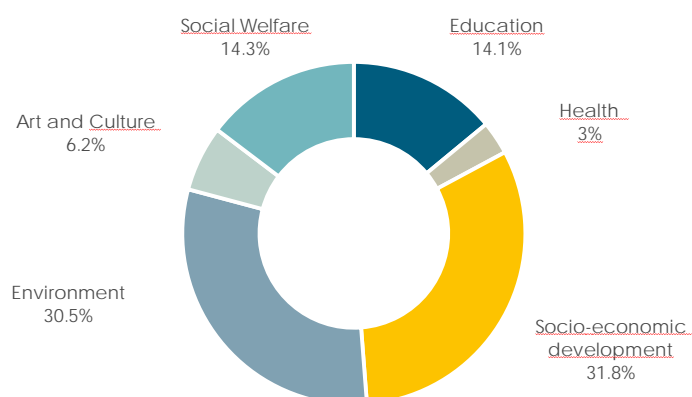
Motivation of the initiatives



Type of contribution



Contribution by area of action



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Contribution to the SDGs



Working towards more local volunteering

In 2022, we launched the new Volunteering Programme deploying a corporate volunteering platform that offers a space to encourage participation, raise awareness and increase visibility of volunteering activities that will be implemented in the company's key countries over the next year.

This new programme promotes the participation of employees as well as business partners and relatives, in initiatives driven either by the company or by them. The goal is to encourage local volunteering and support for the communities where ACCIONA develops its projects with a view to increasing the positive impact on society and its environment. The ultimate aim is to gain a deeper insight into the local reality and strengthen the objective of being recognised as valuable players in society.

In this respect, the 2025 Sustainability Master Plan has set the target of reaching 100,000 hours of voluntary work by the end of that period.

The volunteering proposal is divided into three types:

- **Recognition Programme:** led by human resources, includes programmes nominally intended for employees who show exceptional performance.
- **Institutional Volunteering:** development of activities with third-sector organisations (Foundations and NGOs) with which ACCIONA has a relationship of institutional collaboration.
- **Project Volunteering:** this takes place in settings where the company has projects in progress, responding to local social and environmental needs and maximising the positive impact of the projects on the community.

In 2022, the company put many initiatives into effect with the participation of 2,904 volunteers who have spent 18,242 hours working in the community with very varied targets, including boosting the career of young unemployed university graduates, together with the Príncipe de Girona Foundation, and helping to open up the job market to women with disability, victims of gender violence, with family responsibilities or unemployed people in vulnerable situations, in collaboration with the Integra Foundation or the Quiero Trabajo Foundation.

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Furthermore, we have implemented different initiatives in the different countries in which ACCIONA operates.

acciona.org Foundation

- 92,445 people benefitted in Peru, Mexico, Panama, Chile, Philippines and Spain, this equals 20,563 homes benefitted.
- 1,127 rural and indigenous communities served in Peru, Mexico Panama, Chile, Philippines and Spain.
- 37 supply and service centres run by local microfranchised staff.

Present in seven countries, acciona.org continues to grow its business and in 2022, it benefitted homes and community and teaching centres with basic services.

In Peru, the company brought power to 2,117 homes through the Light at Home (Luz en Casa) project in the Loreto area (in the Amazonia) and, for the first time, to the Cuzco area, where it has brought power to 500 homes in the districts of Echerati, Vilcabamba, Santa Teresa and Huayopata. On the other hand, with the Water at Home (Agua en Casa) programme, it has implemented demo systems to improve water quality and management, to be technologically appraised in two communities in the Ica area. Thanks to its Light at Home project, acciona.org was the winning charity of the Peru Recognition for SDGs within the category of Prosperity, awarded by the Sustainable Peru initiative that is supported by the UN in the country, KPMG Peru and El Comercio newspaper.

In Mexico, it began its activity in the state of San Luis Potosí with a pilot project of Light at Home that benefits 50 homes in the remote rural area of Huasteca. Also in San Luis Potosí, in a partnership between ACCIONA's Services business, BMW and BayWare, we built a solar plant that is connected to the national power grid to allow savings in the electricity bills paid by the Colonial Juvenil charity that trains over 100 young people with scarce resources in the rural communities of San Luis Potosí.

acciona.org also continued its activity in the state of Oaxaca, completing its first scale-up of the At Home (En Casa) programme in Oaxaca, which has brought sustainable power, drinking water, suitable sanitation and cooking facilities to 80 homes in 2022, in a partnership with the Polytechnic University of Madrid and co-funded by the Spanish Agency for International Development Cooperation (AECID). Furthermore, we have formed an alliance with the Mexican company Rotoplas to use their rainwater harvesting technology that benefits 25 homes in a first pilot project. Meanwhile, we have resumed the implementation of the Light at Home programme in Oaxaca with a new power supply model to benefit rural homes in the most remote areas of Oaxaca and which is also applied in San Luis Potosí.

In Panama, acciona.org continued to expand the Light at Home programme by bringing the basic electricity service to 1,397 homes in the indigenous region of Ngäbe-Buglé. This work by acciona.org won a prize at the Recognition Awards for Energy Transition 2022 by the Department for Energy in Panama under the category of Universal Access to Energy.

In Chile we also centred our activity on expanding the Light at Home programme and have brought power from renewable sources to another 121 homes in rural communities in the area of Coquimbo.

In Spain, in a partnership with the town council of San Juan del Puerto (Huelva), we began to operate the first solar plant for collective self-consumption which will supply power to 43 homes suffering from energy poverty, and to help nine public buildings shrink their municipal carbon footprint.

In Philippines, the company began its first project in the country, called Light at Home El Nido that, in collaboration with the Ayala Foundation, has provided an affordable, reliable and sustainable service for 119 homes and nine community centres in the north of the island of Palawan, who were using diesel generators, oil lamps and deficient solar kits to cover their needs.

In Ethiopia, we continued to take part, together with AECID, the Polytechnic University of Madrid and other Spanish businesses in the project to bring basic household power supply services to the areas of Dollo Ado and their host communities in the Somali region.

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In 2022, acciona.org improved the conditions of 20,600 homes by giving them access to affordable, reliable and sustainable basic power, water and sanitation services, benefitting over 92,400 persons. This was possible thanks to partners, co-funders and volunteers who helped the organisation by going to the projects in person after two years of restrictions due to the COVID pandemic.

Impacts of acciona.org in 2022

MEXICO

Start of the activity in the state of San Luis Potosí with 2 electrification projects. Over 35,800 persons gained access to power, water, sanitation and cooking facilities in the country.

CHILE

Light at Home expands to rural communities on the coast and inland in the Coquimbo region, benefitting 544 people.

PHILIPPINES

Light at Home El Nido, first project in Philippines and in the Asian continent, that benefits 552 persons with access to affordable and sustainable power.

PANAMA

16,548 persons benefitted by the Light at Home Ngäbe-Buglé project. Won the Recognition for Energy Transition by the Department for Energy in Panama under the category of Universal Access.

SPAIN

Startup of the solar plant that will produce power to reduce the electricity bill of 43 homes suffering from energy poverty in San Juan del Puerto (Huelva).


PERU

38,800 persons benefitted by the Light at Home programme in Cajamarca, Loreto and Cuzco, as well as the Water at Home project in Ica. Won the Recognition for SDGs for our work in the Light at Home project.

ETHIOPIA

"Allianza Shire: access to energy for refugee camps and host communities" in the Somali region.

SUSTAINABLE FINANCING

Sustainable finances			
ACCIONA Solutions	Impact Materiality	Financial Materiality	
	Result of the topic analysed	Risk	Opportunity
	Critical	<ul style="list-style-type: none"> Bigger regulatory burden 	<ul style="list-style-type: none"> Revenue increase Higher asset valuation
ACCIONA media: Information			

Maximising the capacity of sustainable finances enhances the company's value and the sustainable competitive advantage of its projects. For this reason, ACCIONA promotes innovative solutions for sustainable financing which make it possible to provide these infrastructures with distinctive, clearly beneficial features, taking advantage at the same time of the interest of the capital markets in funding the existing gaps in the fulfilment of the Sustainable Development Goals.

ACCIONA uses two mechanisms of sustainable funding: one aimed at projects or activities that given their nature have a positive impact and another of a corporate nature that involves taking on commitments to improve the ESG performance of the whole company.

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Sustainable funding operations

Type of funding	Total outstanding funding instruments	Funding operations closed in 2022	Total amount (€M)
Green funding intended for projects	48**	9**	3,966
Corporate funding with sustainable commitments	11	9	5,038***
Total	59	18	9,004***

* For operations in currencies other than the Euro, the amount posted is that according to the exchange rate in force at year-end 2022.

**Includes "tops"

***Includes the principal of bonds issued and the initial amount of loans and credit facilities. The outstanding amount for bonds issued and the limits available of loans and credit facilities are: 3,788 million euros for corporate funding with sustainable commitments and 7,755 million euros for the total sustainable funding.

Green Funding

ACCIONA has a Green Funding Framework whose eligible activities are those in line with a low-carbon economy. As a result, the total amount of ACCIONA's funding instruments under the Green Funding Framework was 3,966 million euros on 31 December 2022.

The Green Funding Framework has been reviewed by Sustainalytics, who gave a second-party opinion (SPO) which confirmed its compliance with the Green Bond Principles and the Green Loan Principles.

Sustainability-linked funding

ACCIONA also receives funding linked to compliance with environmental, social and corporate government performance goals. At present, in its Sustainability-linked Funding Framework, ACCIONA has undertaken to meet seven sustainable performance goals linked to this funding, initially for 5,038 million euros, with an outstanding balance of 3,788 on 31 December 2022.

In 2022, ACCIONA developed three new goals focused on the decarbonisation of the value chain and other key players in the environments where it operates, which means that its Funding Framework extends its scope as follows:

- **KPI 5:** decarbonisation plans for small to medium enterprises in ACCIONA's value chain. This focuses on supporting SMEs, especially sensitive ones with limited resources, in developing a plan that will help them successfully transition towards a decarbonised economy.

ACCIONA, thanks to the Sustainability-linked *Schuldscheindarlehen* operation, will develop, during the funding, 51 decarbonisation plans for the company's SME suppliers for a total 325 million euros.

- **KPI 6:** Early adopter programme: this focuses on fostering the development of decarbonised alternatives for some of the supplies with highest emission intensity in the industry: energy, steel, concrete and machinery. ACCIONA commits to spend a certain amount on these supplies.

The RIN Facility Refinancing ASPAC operation involves the purchase of zero or low-emission supplies in Australia for A\$3.78M.

Several bilateral funding operations for €420M involve purchasing zero or low-emission supplies worth €1.89M.

- **KPI 7:** decarbonisation plans for farmers related to the MacIntyre wind farm project in Australia. This action aims to support a sector that is crucial for the local economy and society in its transition to a decarbonised economy in line with the targets of the state of Queensland. It also focuses on reducing the weight of farming emissions on the state inventory.

Several sustainable funding operations, totalling A\$1,603.6M, will translate into the development of decarbonisation plans for at least 150 local farmers.

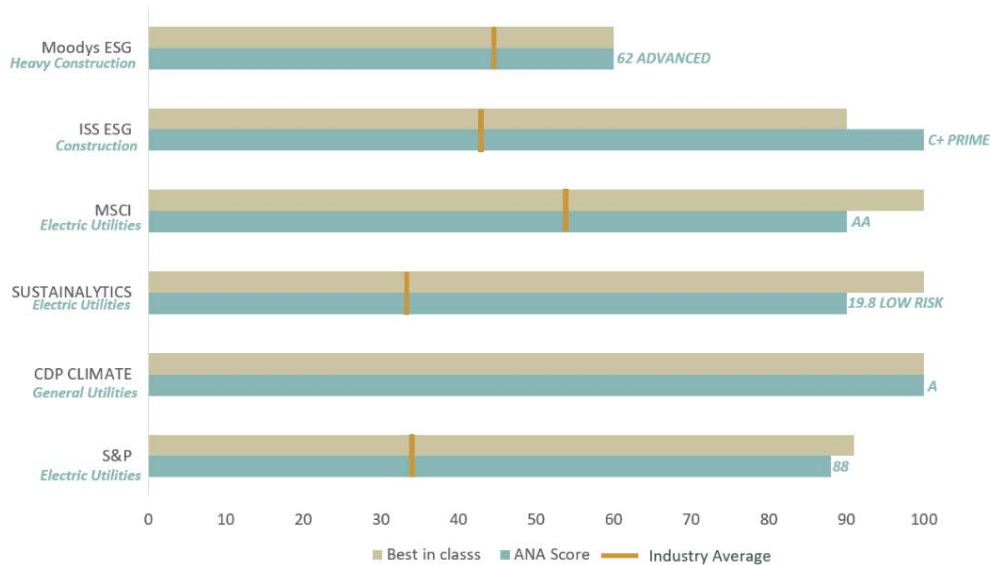
The tracking of the Group's compliance with the Sustainable Development Goals, together with external inspections, as well as other reporting requirements linked to sustainable funding are made public in the [Sustainable Funding Report](#) available in the Sustainable Funding section on ACCIONA's website.



More information: [ACCIONA's Sustainable Finances](#)

External ESG rating

ACCIONA has been regularly assessed in terms of sustainability by different ESG analysts. In 2022, the company once again stood out as one of the industry leaders in the main benchmarks:




ACCIONA on the Dow Jones Sustainability World Index

This index comprises the global leaders in sustainability listed by S&P Global through its Corporate Sustainability Assessment or CSA. It reveals the top 10% of the 2,500 biggest companies on the S&P Global BMI, according to long-term economic, environmental and social criteria. ACCIONA became part of this index on 19 December 2022 with a score of 88 points out of 100.

Consequently, S&P Global awarded ACCIONA the Gold Sustainability Yearbook Award 2022, which places it on the podium of the best utility companies in the world in terms of sustainability.

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Presence in sustainability indexes

Supplier	Name of the index
	Fidelity Clean Energy ESG Tilted Index PR
	Fidelity Clean Energy ESG Tilted Index NR
	Solactive Clean Energy Index NTR
	Solactive European Renewables Stock NTR Index
	J.P. Morgan QUEST Renewable Energy Index
	Solactive Candriam Factors Sustainable Europe Equity Index
	Solactive ISS ESG Screened Europe Small Cap Index NTR
	Euronext Vigeo Europe 120 Index
	Bloomberg Goldman Sachs Global Clean Energy Index Price Return
	STOXX Sustainability Index
	STOXX Europe 600 ESG Broad Market
	MSCI EAFE Choice ESG Screened Index
	MSCI World Custom ESG Climate Series A Net in EUR

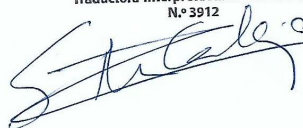
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Presence in rankings and other sustainability acknowledgements

Recognition	Organisation	Position	Description
<i>Europe's Climate Leaders 2022</i>	<i>Financial Times</i>	Among the 300 most decarbonised companies	Ranking of companies who have most reduced their emission intensity between 2015 and 2020.
<i>New Energy Top 100 Green Utilities</i>	<i>Energy Intelligence</i>	1st utility in the world	For the eighth year in a row, ACCIONA Energía has validated its position as the world's "greenest" electric utility company.
<i>Diversity Leaders</i>	<i>Financial Times</i>	N/A	ACCIONA has been recognised for setting diversity and inclusion as top priorities in its strategy. For this ranking, over 10,000 employees from different companies are interviewed.
<i>CDP Climate Change</i>	<i>CDP</i>	Leader (A list)	ACCIONA and ACCIONA Energía are part of the A List. List made up of the corporations with the best practices and results in reducing emissions, tackling climate change and aligning their activities with a low-carbon economy.
<i>Gaia Rating</i>	<i>EthiFinance</i>	N/A	Its social, environmental and corporate governance development is assessed. The score is 65 out of 100 (2021), above the industry average and standing out for its governance, social and environmental efforts and external stakeholders.
<i>CDP Water</i>	<i>CDP</i>	A-	List of companies with best practices and results in water safety, production and reduction of environmental impacts.
<i>Nature Benchmark</i>	<i>World Benchmarking Alliance</i>	1st in the sector	Nature Benchmark measures and ranks the most influential companies in the world according to their efforts in protecting our environment and biodiversity.
<i>SE Index Member</i>	<i>Standard Ethics</i>	EE- Sustainable Grade	This index aims to measure over time the stock market confidence in the guidelines and voluntary instructions given by the OECD, EU and UN on Sustainability and Corporate Governance.

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Impact per region

Impact of the company's activity in the most relevant countries for the main business lines

SPAIN

Noteworthy projects in 2022

Celada Fusión Wind Farm
Energy
48 MW of wind capacity

O&M EDAR Arroyo Culebro CB
O&M II
WATER
Amount of on-site recycled/reused water: 111,930.7 m³

Biological pest control in historical parks
ASUMA
Impact on fauna: 45% increase of bats and birds in the area

MESENA CAMPUS
Real estate
100,000 m² surface area

AVE PULPI LORCA
Transport
31.3 Km in the Murcia-Almeria line.

SIERRA BRAVA OFFSHORE SOLAR PLANT
Energy
1.13 MW capacity

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	4,924	57%
Renewable energy production (GWh)	11,720	-4%
Water treatment (hm ³)	362	13%
Social		
Workforce at year-end	22,778	3%
Women in management and executive positions (%)	26.87	0.57bp
Accidents: global frequency rate (employees and subcontractors)	6.05	34%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	5,118	-5%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	36.2	4%
Percentage of waste to landfill (%)	29	14bp
Water consumption (hm ³)	2.51	19%

To calculate the variation percentage (%) we used all decimals

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AUSTRALIA

Noteworthy projects in 2022

MACINTYRE WIND FARM

Energy

1,026 MW capacity

WESTERN SYDNEY AIRPORT -
BULK EARTHWORKSConstruction10 million national and
international passengers per
year

ROOKWOOD WEIR PROJECT

WaterWill keep over 250 jobs during
the construction and 95% of
the project expenditure will be
spent in Queensland.SYDNEY METRO WEST - CENTRAL
TUNNELLING PACKAGEACCIONA Ferrovial11 kilometres and tunnelling of
five new stations.

MORTLAKE SOUTH WIND FARM

Energy

157.5 MW capacity

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	1,637	14%
Renewable energy production (GWh)	1,075	-6%
Water treatment (hm ³)	12	3%
Social		
Workforce at year-end	2,921	6%
Women in management and executive positions (%)	13.19	-0.11bp
Accidents: global frequency rate (employees and subcontractors)	0.15	25%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	954	-2%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	45.8	-15%
Percentage of waste to landfill (%)	8	7bp
Water consumption (hm ³)	0.75	-25%

To calculate the variation percentage (%) we used all decimals

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CHILE

Noteworthy projects in 2022

MARGA MARGA HOSPITAL
Construction

+250 hospital beds

RESERVOIR OF RELAVES PAMPA AUSTRAL
Corporate

+800 jobs at the height of the construction work

CHUQUICAMATA TUNNELS
Construction

ACCIONA's project consists of building two parallel tunnels with air injection which are 4,375 m and 4,320 m long.

TOLPÁN SUR: WIND FARMEnergy

183 MW capacity

EL ROMERO SOLAR PLANT:Energy

196 MW capacity

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	517	37%
Renewable energy production (GWh)	2,137	2%
Water treatment (hm ³)	7.9	-8%
Social		
Workforce at year-end	3,228	52%
Women in management and executive positions (%)	20.06	0.96bp
Accidents: global frequency rate (employees and subcontractors)	2.62	5%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	1,802	-0.06%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	10	122%
Percentage of waste to landfill (%)	100	21bp
Water consumption (hm ³)	0.043	-20%

To calculate the variation percentage (%) we used all decimals

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MEXICO

Noteworthy projects in 2022

MANAGEMENT OF THE INTEGRAL WATER CYCLE IN VERACRUZ AND MEDELLÍN	EL CORTIJO WIND FARM <u>Energy</u> 183 MW capacity	OAXACA WIND FARM <u>Energy</u> 206 MW capacity
<u>WATER</u> Supply to nearly 1 million inhabitants		

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	355	40%
Renewable energy production (GWh)	3,723	-7%
Water treatment (hm ³)	82.4	55%
Social		
Workforce at year-end	2,782	10%
Women in management and executive positions (%)	19.53	-0.97bp
Accidents: global frequency rate (employees and subcontractors)	0.44	-38%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	1,878	2%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	1.7	55%
Percentage of waste to landfill (%)	98	2bp
Water consumption (hm ³)	0.076	62%

To calculate the variation percentage (%) we used all decimals

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UNITED STATES

Noteworthy projects in 2022

FARGO-MORHEAD ANTI-FLOODING CHANNELTransport

This will protect over 235,000 people against the catastrophic effects of flooding by the Rojo river.

TENASKA SOLAR PLANTEnergy

765 MW capacity

FORT BEND SOLAR PLANTEnergy

315 MW capacity

Highlighted indicators

	2022	Variation 2020-2021
Activity		
Sales (million euros)	125	-19%
Renewable energy production (GWh)	2,160	10%
Water treatment (hm ³)	0	0
Social		
Workforce at year-end	222	11%
Women in management and executive positions (%)	16.98	3.38bp
Accidents: global frequency rate (employees and subcontractors)	0.73	4%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	1,292	14%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	6.1	-34%
Percentage of waste to landfill (%)	2	-2bp
Water consumption (hm ³)	0.455	15%

To calculate the variation percentage (%) we used all decimals

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POLAND

Noteworthy projects in 2022

KROBIA I - PONIEC II WIND FARM

Energy

- 21 wind turbines
- 80,000 Polish homes
- 54,000 tonnes of CO₂ avoided

KROBIA I AND PONIEC II EDUCATIONAL CAMPAIGNS

Energy

Creation and equipment of public parks for children also sponsoring music activities for children and young people.

Highlighted indicators

	2022	Variation 2020-2021
Activity		
Sales (million euros)	402	19%
Renewable energy production (GWh)	217	6%
Water treatment (hm ³)	0	0%
Social		
Workforce at year-end	1,567	4%
Women in management and executive positions (%)	19.03	2.63bp
Accidents: global frequency rate (employees and subcontractors)	0.41	-92%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	168	6%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	2.8	-51%
Percentage of waste to landfill (%)	31	-69bp
Water consumption (hm ³)	0.027	4%

To calculate the variation percentage (%) we used all decimals

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N.º 3912



BRAZIL

Noteworthy projects in 2022

LINE 6 OF SÃO PAULO
UNDERGROUNDConstruction

600,000 passengers/day

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	433	112%
Renewable energy production (GWh)	0	0%
Water treatment (hm ³)	0	0%
Social		
Workforce at year-end	3,830	137%
Women in management and executive positions (%)	20.48	1.98bp
Accidents: global frequency rate (employees and subcontractors)	0.67	63%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	0	0%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	16.3	90%
Percentage of waste to landfill (%)	3	-5bp
Water consumption (hm ³)	0.265	327%

To calculate the variation percentage (%) we used all decimals

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CANADA

Noteworthy projects in 2022

Clean Energy Site C

Construction

1,100 MW of power

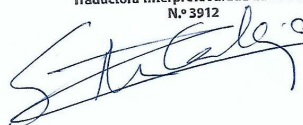
450,000 homes

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	433	10%
Renewable energy production (GWh)	524	10%
Water treatment (hm ³)	0	0%
Social		
Workforce at year-end	862	-28%
Women in management and executive positions (%)	20.03	-4.47bp
Accidents: global frequency rate (employees and subcontractors)	1.74	-42%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	348	7%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	31.3	4%
Percentage of waste to landfill (%)	97	13bp
Water consumption (hm ³)	0.423	8%

To calculate the variation percentage (%) we used all decimals

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UNITED ARAB EMIRATES

Noteworthy projects in 2022

The Dubai Underground project

Transport

14.5 km of tracks

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	6	-88%
Renewable energy production (GWh)	0	0%
Water treatment (hm ³)	44	-40%
Social		
Workforce at year-end	131	-37%
Women in management and executive positions (%)	7.50	-7.5bp
Accidents: global frequency rate (employees and subcontractors)	0.00	0%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	0	0%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	0.1	-80%
Percentage of waste to landfill (%)	100	18bp
Water consumption (hm ³)	0.007	-75%

To calculate the variation percentage (%) we used all decimals

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SAUDI ARABIA

Noteworthy projects in 2022

O&M IDAM à Shuqaiq O&MWater

Production of drinking water in a water-stressed region.
Capacity to supply 2,000,000 persons.

Al Khobar II Desalination PlantWater

3 million inhabitants supplied

D&C IDAM à Jubali 3bWater

600,000 inhabitants supplied

Highlighted indicators

	2022	Variation 2021-2022
Activity		
Sales (million euros)	535	31%
Renewable energy production (GWh)	0	0%
Water treatment (hm ³)	8	-87%
Social		
Workforce at year-end	376	117%
Women in management and executive positions (%)	12.15	-3.15bp
Accidents: global frequency rate (employees and subcontractors)	0	0%
Environmental		
Emissions avoided (thousands of tCO ₂ e)	0	0%
GHG emissions Scope 1&2 (thousands of tCO ₂ e)	2.5	317%
Percentage of waste to landfill (%)	100	0bp
Water consumption (hm ³)	0.008	-38%

To calculate the variation percentage (%) we used all decimals

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Appendices

ABOUT THIS REPORT

This Non-financial Information Statement sets out the progress, results and status of ACCIONA's sustainability performance in 2022, as well as its management approach and the challenges it faces. The purpose of this Report is to clearly and meticulously provide the most relevant information about the company as it relates to the most significant positive and negative impacts produced on its different stakeholders.

The report is based on the challenges described in previous years' sustainability reports and focuses on the progress made during 2022. The content has been expressed to serve as the *Non-Financial Information Statement 2022*.

This Report also describes the company's annual progress in implementing the United Nations Global Compact's Ten Principles on human rights and labour rights, the environment, anti-corruption, and ACCIONA's contribution to achieving the Sustainable Development Goals (SDGs) locally.

The information published in this document is supplemented by other company reports: the *Consolidated Financial Statements and Directors' Report*, the *Annual Corporate Governance Report* and the *Integrated Report*. The sustainability content is updated regularly on ACCIONA's website: www.accionacom.com.

The company addresses the main sustainability issues that concern its internal and external stakeholders, whether they involve a particular topic or a particular line of business. The first sections deal with the issues regulated in Spanish Law 11/2018, with a structure adapted to the 2025 Sustainability Master Plan.

In order to prepare the report and determine its contents, we followed the principles of Relevance and Faithful Representation, and we have guaranteed the comparability, verifiability and understandability of the information.

ACCIONA has followed the principles – such as comparability, completeness and balance – described in this standard.

Comparability

The Non-financial information statement is for a year and meets the reporting Principles laid down in Standard 1 of the Global Reporting Initiative (GRI 2021) of accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

This report has been drawn up in accordance with the Global Reporting Initiative standards.

Materiality and relevance

The Materiality Analysis 2022, carried out by ACCIONA in keeping with the principles of GRI Standard 1, has made it possible to identify those economic, environmental and social issues that have the greatest impact on the company's activities.

As a result of this study, ACCIONA considers that the information contained in this document is relevant for the company and its various stakeholders. The section titled *Double Materiality Analysis* describes the development process and methodology used to identify the contents of the document.

Reliability

To check the reliability of the data and the consistency of the information in response to GRI Standards, the company commissioned an external audit of the Non-financial Information Statement through the firm KPMG Asesores S.L. As a result of the audit, this Report contains an *Independent Review Report* detailing the objective and scope of the review, the procedures used and the conclusions reached.

ACCIONA has chosen a reasonable level of review for some indicators.

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SCOPE

ACCIONA has been reporting on the non-financial performance of its businesses in its *Sustainability Reports/Non-financial Information Statements* since 2005. The company describes its activities, providing an overview by territory for the most important variables.

The scope of the report comprises all of the group companies¹¹, in all their significant aspects, in accordance with the terms of Spanish Law 11/2018 of 28 December, on non-financial information and diversity.

Throughout the report, the scope of each of the indicators shown is specified. Similarly, data from previous years is provided in order to facilitate a better understanding of the evolution of the company's performance.

The criteria for the consolidation of environmental information is based on the financial control scheme.

ACCIONA Energía

The energy division, ACCIONA Energía, became a listed company in 2021. The business line publishes its own Sustainability Report in its annual Directors' Report. Both reports follow the same principles and objectives.

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¹¹ All the companies in the group are listed in Annexes I, II and III of the Consolidated Financial Statements of the company. The group companies that meet the requirements set out in article 49.5 of the Code of Commerce are: INGENIERIA ESPECIALIZADA OBRA CIVIL E INDUSTRIAL, S.A. ACCIONA GENERACIÓN RENOVABLE, S.A. ACCIONA CONSTRUCCION, S.A. ACCIONA TECNOLOGIA Y SERVICIOS S.L. ACCIONA AGUA, S.A. ACCIONA INDUSTRIAL, S.A. ACCIONA FACILITY SERVICES, S.A. ACCIONA MEDIOAMBIENTE, S.A. ACCIONA MANTENIMIENTO DE INFRAESTRUCTURAS, S.A. ACCIONA AGUA SERVICIOS S.L. ACCIONA SERVICIOS URBANOS, S.L.

DEFINITION OF MATERIAL TOPICS

The material topics considered this year have been updated taking into account the studies conducted on megatrends in the area of infrastructure developed in the Infrastructure Futures Report by Global Infrastructure Hub and its cross with the 2020-2025 Sustainability Master Plan. These topics were completed with 10 independent industry-specific topic standards published by the European Financial Reporting Advisory Group (EFRAG) in November 2022.

Material topic	Description
Mitigation of climate change	Mitigation consists of the company launching actions across its value chain to reduce and limit greenhouse gas emissions in order to curb the increase in the Earth's temperature.
Adaptation to climate change	This refers to following a regenerative business strategy with solutions aimed at limiting impacts, reducing vulnerabilities and increasing resilience against the climate change of human and natural systems, including biodiversity, forests, coasts, cities, farming, industry, etc.
Scarcity of water	This refers to the need to manage the use of water appropriately, including harvesting, consumption, treatment and associated effluent in such a way that the total net impact on the water resource is regenerative.
Conservation of biodiversity and ecosystems	The impact management carried out by the company for the conservation of biodiversity and ecosystems comprises measures such as establishing policies, analysing the state of the ecosystems affected, implementing actions for protection and solutions based on nature/natural climatic solutions. It also includes environmental risk management, the precautionary principle and regulatory compliance.
Circular economy	Circular economy promotes change towards an economy that is efficient in the use of material resources, taking into account an analysis of the full life cycle of the products and services associated to the value chain. Proper waste management includes updating policies, research into new uses for waste and how to recycle it.
Talent development	Strategy and schemes to attract and retain leadership talent, and also to reduce staff turnover, performance assessment procedures, investment in training and instruments for motivating commitment such as scholarships or incentives linked to personal targets and sustainability.
Diversity and working conditions	Measures that guarantee job security as well as diversity and equal opportunities, from the recruitment of people at risk of social exclusion to courses on multiculturalism. Additionally, actions implemented for overcoming the salary gap are taken into account.
Health and safety	A reduction in occupational accidents and worker and contractor illnesses requires identifying and mitigating the risks and training. A sustainable work environment also includes measures for the organisation of working hours.
Human Rights	Measures introduced to respect the Human Rights of stakeholders and mechanisms to safeguard any possible violations, both in social and labour relationships, including suppliers.
Clients and fair trade	Establishing mechanisms to collect customer feedback and thus being able to measure their satisfaction and manage the relationships with them. Ensuring the quality and safety of the products supplied. Fair competition refers to a free market where all players operate at arm's length. Businesses base their competitive practices on pricing, quality and customer service.
Innovation in the industry	Development and implementation of a business model that will foster innovation on the range of products and services supplied at all levels, in order to remain at the forefront.
Transparency and dialogue	Sharing information and feedback between stakeholders on important matters internally and externally. To do so, the company must ensure it has active and effective communication channels between the different interested parties in the company.
Cybersecurity	Digital transformation and cyberattacks give rise to the need for IT security to guarantee the privacy and protection of customers and the strategic data and systems for a company to function.

Conditions of the supply chain	Social, environmental and ethical criteria are relevant for selecting suppliers. This includes establishing policies, corrective actions in cases of non-compliance, risk assessment and the identification of suppliers' water and carbon footprints. In the infrastructure sector, local procurement and the use of products with positive life cycle footprints are considered relevant.
Development of local communities	A company's activity has a positive repercussion on the local economy, for example by generating wealth, providing jobs and new ecosystems.
Development of sustainable finances	Encourage processes that take into account environment, social and governance (ESG) factors when taking decisions on investments in the financial sector, which leads to longer-term investments in sustainable economic projects and activities with a regenerative impact.
Business Code of Conduct	As part of a company's good governance, an anti-corruption policy and a code of ethics need to be established, in addition to promoting regulatory compliance and integrity in bids and tenders. Any activity in public policy has to be transparent and relations with third parties must be safeguarded through due diligence.
Responsible taxation	Responsible taxation is an approach to tax that is open, developmental and considers the interests of all stakeholders: governments, taxpayers and communities. It also considers that transparency in the breakdown of tax payments is relevant for companies with multinational presence.

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ANNEX OF ITEMIZED INDICATORS

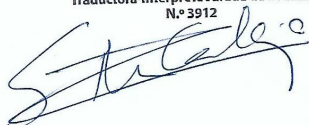
PRODUCTS AND SERVICES FOR PUBLIC AND PRIVATE-SECTOR CUSTOMERS

(GRI 2-6)

Products and Services	Public customers and private business-to-consumer (B2C) and business-to-business (B2B) customers in 2021
ENERGY: sale of renewable energy, renewable technology EPC contracts and O&M of renewable technology plants and PPA.	<p>Solar farms: 27,747 B2C customers.</p> <p>Energy retail: more than 40 public sector customers and 2,300 private sector B2B customers.</p> <p>PPA: 93 private B2B customers.</p> <p>ESCO: 20 B2B customers Spain; France (Equinov) 15 public customers and 378 private customers.</p> <p>CECOER: 1 private B2B customer.</p> <p>Electric Mobility: 26,579 users registered and 21 B2B customers (5 public contracts and 16 private contracts).</p>
INFRASTRUCTURES	
<ul style="list-style-type: none"> Construction: civil engineering, building, infrastructure maintenance, engineering, EPC projects of industrial plants and waste treatment plants, O&M of renewable energy plants, electrical installations and heating & cooling. 	<p>Awarded works: 84 awarded works, 70% public customer (equal to 41 customers) and 30% private customers (equal to 18 customers)</p> <p>› Public customers: 2 (Industrial)</p> <p>› Private B2B customers: 6 (Industrial)</p>
<ul style="list-style-type: none"> Concessions: social infrastructures and transport infrastructures. 	Public sector: 12 concessions for the public sector and 1 private.
<ul style="list-style-type: none"> Water: management of water services, automation and control, construction and O&M of drinking water, wastewater treatment and desalination plants. 	<p>Construction: 75% desalination, 20% treatment and 5% purification plants.</p> <p>Plant O&M: 25 SWROs and 19M population supplied. 160 WWTPs and 19.5M population supplied; 8 DWTPs and 3M population supplied</p> <p>Services: 48 municipalities served, 312,117 inhabitants supplied with upstream service, 635,300 inhabitants supplied with downstream service, 1,811,188 inhabitants supplied with sewer system services and 12 million users of the integral water cycle in 180 municipalities in Spain, Mexico and Peru.</p> <p>Plant O&M: 7,243,199 inhabitants with wastewater treatment.</p>
<ul style="list-style-type: none"> Other infrastructure businesses: landscaping, waste collection and treatment, healthcare transport. 	<p>URBAN ECOSYSTEMS:</p> <p>Public customers: 31.</p> <p>ASUMA:</p> <p>Public customers: 188.</p> <p>Healthcare:</p> <p>Public customers: 2.</p>
OTHER BUSINESSES	
<ul style="list-style-type: none"> Bestinver: Financial asset management services through investment funds, pension funds, and SICAVs. This activity is complemented by stock brokerage services. 	Private B2C customers: 50,513.
<ul style="list-style-type: none"> Mobility: shared electric mobility services 	<p>Private B2C customers: 450,000 users.</p> <p>Private B2B customers: 7.</p>
<ul style="list-style-type: none"> Real estate: real-estate development, management of rental assets. 	<p>Private B2B customers: 97% of turnover comes from homes for sale, 3% from property business and 0% from home rentals.</p> <p>Private customers B2C: 0% turnover from customers in university halls of residence (the company that was managing the university halls of residence was sold at the end of 2020).</p>
<ul style="list-style-type: none"> Other services: cleaning, maintenance, forwarding, airport services. 	<p>Public customers: cleaning and maintenance.</p> <p>AFS-ES: 30%</p> <p>Private B2B customers: cleaning and maintenance.</p> <p>AFS-ES: 70%</p> <p>Forwarding: 777 (100% private).</p> <p>Airport: 72.</p>

Acronyms: Renewable Energies Control Centre (CECOER), Operations and Maintenance (O&M), Power Purchase Agreement (PPA), Hotels, Restaurants and Cafés (HORECA), Investment company with variable capital (SICAV), Engineering, Procurement and Construction (EPC), Waste Water Treatment Plant (WWTP), Drinking Water Treatment Plant (DWTP), Sea Water Reverse Osmosis (SWRO).

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Distribution of employment

(GRI 2-7)

Evolution of distribution of the workforce by contract type and gender (No. of employees)

Divisions	2021						2022					
	Temporary			Permanent			Temporary			Permanent		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Energy	53	24	77	1,208	476	1,685	63	25	88	1,639	627	2,266
Infrastructures							3,674	659	4,334	15,475	3,262	18,736
• Construction	2,249	411	2,660	7,661	1,764	9,425	2,245	408	2,654	10,419	2,219	12,638
• Concessions	3	1	4	48	35	83	5	3	8	56	54	110
• Water	2,104	268	2,372	2,757	547	3,303	1,115	176	1,291	3,307	698	4,005
• Other infrastructure business	532	88	620	1,257	189	1,446						
							310	72	381	1,692	291	1,983
Other businesses	3,500	2,025	5,525	8,917	5,546	14,463	2,437	1,586	4,023	10,067	6,377	16,445
Total	8,440	2,818	11,258	21,847	8,558	30,405	6,175	2,270	8,445	27,181	10,266	37,447

Note. The business lines of "Other infrastructure businesses" and "Other businesses" were created in 2021. This is why their data may not be compared to the divisions existing in 2020. The calculation methodology may use values with decimals that will later be rounded off.

Evolution of the breakdown of the workforce by job classification and age range (No. of employees)


Groups*	2021				2022			
	< 31	31 to 50	> 50	Total	< 31	31 to 50	> 50	Total
Executives and managers	26	1,925	763	2,714	22	915	2,071	3,008
Technical staff	1,527	4,921	1,001	7,449	1,890	1,206	5,395	8,491
Support staff	291	836	295	1,423	432	352	995	1,780
Operators	6,088	15,850	8,139	30,077	6,574	9,429	16,611	32,614
Others	-	-	-	-	-	-	-	-
Total employees	7,933	23,532	10,198	41,664	8,918	11,903	25,071	45,892

* The calculation methodology may use values with decimals that will later be rounded off.

Evolution of the number of employees per contract type and age range (%)

Ranges	2021		2022	
	Temporary	Permanent	Temporary	Permanent
< 31 years	38%	62%	24%	76%
31 to 50 years	25%	75%	17%	83%
> 50 years	22%	78%	17%	83%

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Evolution of the number of employees per contract type and job classification (%)

Groups	2021		2022	
	Temporary	Permanent	Temporary	Permanent
Executives and Managers	2%	98%	2%	98%
Technical staff	20%	80%	14%	86%
Support staff	18%	82%	14%	86%
Operators	31%	69%	21%	79%
Others	-	-	-	-

Evolution of the geographical distribution of the workforce (No. of employees)

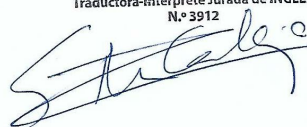
Countries*	2021			2022		
	Men	Women	Total	Men	Women	Total
Spain	13,831	6,308	20,139	14,210	6,568	20,778
Germany	374.86	55	430	240	37	277
Australia	2,202	557	2,759	2,266	655	2,921
Brazil	1,463	151	1,614	3,433	398	3,830
Canada	878.24	315	1,193	657	205	862
Chile	1,717	412	2,129	2,772	456	3,228
Ecuador	403.8	59	463	212	36	248
UAE	157.94	49	207	97	34	131
United States	171.65	29	200	189	33	222
Italy	502.77	36	539	539	38	577
Mexico	1,563	962	2,524	1,643	1,138	2,782
Norway	208.4	53	261	211	51	262
Oman	168.7	51	220	382	86	468
Peru	1,970	217	2,187	1,181	196	1,377
Poland	1,144.71	356	1,501	1,174	393	1,567
Portugal	769.88	840	1,610	845	958	1,803
Qatar	1,900	699	2,599	2,179	921	3,100
Rest of the world	861.97	226	1,088	1,127	332	1,459
Total employees	30,288	11,376	41,664	33,356	12,536	45,892

* The calculation methodology may use values with decimals that will later be rounded off.

Breakdown of the workforce by age range and type of working day (%)

Ranges*	2022					
	Full time			Part time		
	Men	Women	Total	Men	Women	Total
< 31 years	5,850	2,043	7,893	668	357	1,025
31 to 50 years	17,428	5,153	22,581	1,096	1,394	2,490

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> 50 years	7,472	2,244	9,716	842	1,344	2,186
Total employees	30,750	9,441	40,191	2,606	3,095	5,702

* The calculation methodology may use values with decimals that will later be rounded off.

Breakdown of the workforce by job classification and gender (No. of employees)

Groups*	2021			2022		
	Men	Women	Total	Men	Women	Total
Executives and Managers	2,123	591	2,714	2,341	667	3,008
Technical staff	5,036	2,413	7,449	5,807	2,684	8,491
Support staff	439	984	1,423	604	1,176	1,780
Operators	22,690	7,388	30,077	24,605	8,008	32,614
Others	-	-	-	-	-	-
Total employees	30,288	11,376	41,664	33,356	12,536	45,892

* The calculation methodology may use values with decimals that will later be rounded off.

Breakdown of the workforce by job classification and type of working day (No. of employees)

Groups*	2022					
	Full time			Part time		
	Men	Women	Total	Men	Women	Total
Executives and managers	2,326	653	2,979	14	15	29
Technical staff	5,762	2,605	8,367	45	79	124
Support staff	579	1,087	1,666	25	89	114
Operators	22,083	5,096	27,179	2,522	2,912	5,434
Total employees (No.)	30,750	9,441	40,191	2,606	3,095	5,701

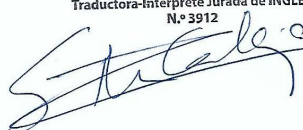
* The calculation methodology may use values with decimals that will later be rounded off.

Breakdown of the workforce by age range and type of working day (%)

Ranges*	2022					
	Full time			Part time		
	Men	Women	Total	Men	Women	Total
< 31 years	13%	4%	17%	1%	1%	2%
31 to 50 years	38%	11%	49%	2%	3%	5%
> 50 years	16%	5%	21%	2%	3%	5%
Total employees	67%	21%	88%	6%	7%	12%

* The calculation methodology may use values with decimals that will later be rounded off.

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Distribution of type of working day by division and by gender (No. of employees)

Divisions	2022					
	Full time			Part time		
	Men	Women	Total	Men	Women	Total
Energy	1,695	637	2,333	8	14	22
Infrastructures	18,416	3,640	22,057	733	281	1,013
• Construction	12,233	2,478	14,711	432	150	581
• Concessions	60	57	118			
• Water	4,360	817	5,177	62	56	118
• Other Infrastructure businesses	1,763	288	2,051	239	74	313
Other businesses	7	2	9	4	6	10
Total employees	20,119	4,279	24,398	744	301	1,045

Note: The business lines of "Other infrastructure businesses" and "Other businesses" were created in 2021. This is why their data may not be compared to the divisions existing in 2020. The calculation methodology may use values with decimals that will later be rounded off.

Average permanent contracts per year by age, gender and job classification (No. of employees)

Group*	2022							
	Men				Women			
	< 31	31 to 50	> 50	Total	< 31	31 to 50	> 50	Total
Executives and managers	4	162	57	223	5	54	6	65
Technical staff	635	1,199	299	2,133	276	382	30	688
Support staff	57	33	6	96	108	92	15	215
Operators	3,186	4,300	1,186	8,672	1,390	1,588	497	3,475
Total employees	3,882	5,694	1,548	11,124	1,779	2,116	548	4,443

* The calculation methodology may use values with decimals that will later be rounded off.

Characteristics of non-employee workers in ACCIONA's workforce

2022	
No. of non-employee workers (external)	4,324

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Breakdown of the total workforce by nationality

Nationality	Percentage of workforce (% of the total workforce)	Participation in all the executive positions (% of total executive staff)
Spanish	43.86	62.54
Brazilian	9.50	1.07
Chilean	6.32	2.05
Australian	5.82	16.57
Mexican	5.24	2.63
Portuguese	3.70	1.08

Dismissals (401-1)

Dismissals by gender and job classification (No.)

Group	2021			2022		
	Men	Women	Total	Men	Women	Total
Executives and managers	49	12	61	36	7	43
Technical staff	94	39	133	76	38	114
Support staff	6	21	27	7	15	22
Operators	887	168	1,055	1,244	556	1,800
Total	1,036	240	1,276	1,363	616	1,979

Note: data as at 31/12/2022 for active personnel. Three categories of dismissals are considered for Spain (Dismissals on objective grounds, disciplinary grounds and collective layoffs). For the rest of the world, involuntary resignations, contract terminations and repatriations or deconsolidation are excluded). The calculation methodology may use values with decimals that will later be rounded off.

Dismissals by job classification and age range (No.)

Group*	2021				2022			
	< 31	31 to 50	> 50	Total	< 31	31 to 50	> 50	Total
Executives and managers	0	30	31	61	23	20	43	
Technical staff	15	75	43	133	18	64	32	114
Support staff	4	13	10	27	7	7	8	22
Operators	275	549	231	1,055	532	803	465	1,800
Total employees	294	667	315	1,276	557	897	525	1,979

* The calculation methodology may use values with decimals that will later be rounded off.

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New hires

(401-1)

Number of new hires by region (No. of employees)

Regions*	Men	Women	Total
Africa	12	6	18
North America	275	69	344
Asia and Oceania	2,113	821	2,934
Central and South America	7,330	2,269	9,599
Europe	691	701	1,392
Spain	4,400	2,299	6,699
TOTAL	14,821	6,135	20,986

* The calculation methodology may use values with decimals that will later be rounded off.

Number of new hires by business line (No. of employees)

Divisions*	Men	Women	Total
Energy	308	159	467
Infrastructures	8,239	1,506	9,745
• Construction	6,573	1,022	7,595
• Concessions	18	10	28
• Water	1,083	251	1,334
• Other Infrastructure businesses	565	223	788
Other Business	6,274	4,500	10,774
Total new hires	14,821	6,165	20,986

* The calculation methodology may use values with decimals that will later be rounded off.

New hires by age group (No.)

Ranges*	2021			2022		
	Men	Women	Total	Men	Women	Total
< 31 years	4,317	2,039	6,356	5,199	2,354	7,553
31 to 50 years	6,210	2,241	8,451	7,506	2,973	10,479
> 50 years	1,466	513	1,979	2,116	838	2,954
Total employees	11,993	4,793	16,786	14,821	6,165	20,986

* The calculation methodology may use values with decimals that will later be rounded off.

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Maternity and paternity leave

(401-3)

Employees entitled to maternity/paternity leave (No. of employees)

DATA*	2021			2022		
	Men	Women	Total	Men	Women	Total
Number of employees with the right to maternity/paternity leave	857	218	1,075	646	196	842
Number of employees who took maternity/paternity leave	857	218	1,075	646	196	842
Number of employees who returned to work after taking maternity/paternity leave	851	217	1,068	646	196	842
Number of employees who returned to work after taking maternity/paternity leave and remained in their jobs twelve months after returning to work	827	214	1,041	617	195	812
Retention ratio**	97.18%	98.62%	97.47%	97.18%	98.62%	98.62%

* The calculation methodology may use values with decimals that will later be rounded off.

**The ratio includes the number of employees remaining in their jobs on 31 December 2022 after having taken paternity/maternity leave in 2022 between the number of employees on paternity/maternity leaves that took place in that year.

Training

(404-1)

Training received by job classification and gender

Training*		2022				
		Executives and managers	Technical staff	Support staff	Operators	Total
Total number of hours received	Men	86,593	177,586	3,746	347,417	615,342
	Women	35,259	99,371	11,652	47,386	193,669
	Total	121,852	27.6957	15,398	39.4804	80.9011
Students	Men	2,056	5,637	271	13,255	21,104
	Women	617	2,437	640	3,415	7,042
	Total	2,673	8,074	911	16,670	28,146
Training hours per employee/year	Men	37.00	30.58	6.20	14.12	18.45
	Women	52.82	37.02	9.91	5.92	15.45
	Total	40.51	32.62	8.65	12.11	17.63

* The calculation methodology may use values with decimals that will later be rounded off.

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Remuneration

The average total remuneration for executives who were not executive directors was in 2022 €179,000 for men (183,000 in 2021) and €143,000 for women (145,000 in 2021).

(405-2)

Note for the data referring to GRI 405-2 and 2-21: professionals with annual earnings of less than 3,000 euros who could not be annualised are not included in the statistical analysis. Bestinver employees are not included in this table. This does not include people having a business relationship with the company. Only the theoretical salary (fixed + variable target) has been taken into consideration for the analysis, therefore share awards are not considered.

Total average remuneration broken down by gender, age and job classification (€)

Production and business development areas*		2021			2022		
Gender	Job classification	< 31	31 - 50	> 50	< 31	31 - 50	> 50
Men	Executives and Managers	113,122	112,584	139,263	68,806	106,338	133,553
	Technical and Qualified Staff	43,042	50,297	53,230	42,475	46,979	46,709
	Other personnel	15,434	19,190	22,303	13,150	19,499	22,588
Women	Executives and Managers	N/A	88,594	109,115	63,951	86,897	104,611
	Technical and Qualified Staff	37,060	43,893	44,527	36,115	44,653	44,834
	Other personnel	12,969	16,129	16,961	11,033	15,835	17,620
Support Areas*		2021			2022		
Gender	Job classification	< 31	31 - 50	> 50	< 31	31 - 50	> 50
Men	Executives and Managers	64,202	108,437	150,717	61,238	109,325	152,889
	Technical and Qualified Staff	34,294	42,125	50,719	36,009	43,650	53,939
	Other personnel	25,268	15,862	24,184	11,250	10,177	20,664
Women	Executives and Managers	66,452	90,810	113,940	89,233	90,482	113,916
	Technical and Qualified Staff	33,436	38,619	46,501	36,886	40,484	48,149
	Other personnel	23,009	25,261	30,233	23,534	26,630	29,131

* The calculation methodology may use values with decimals that will later be rounded off.

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(2-21)

Ratio between highest wage earner and average wage, by business line and country

	Australia	Brazil	Chile	Spain	Mexico
Energy	3.8	3.4	4.8	16.3	15.3
Construction		28.5	15	13.4	3.6
Concessions	1.8	1.0	3.3	9.0	4.7
Water	1.4	1.6	5.1	24	35.4
Oceania	9.1				
Other Infrastructure businesses				8.5	

The company ratio in 2022 was 58.5.

Ratio between the percentage increase of the total annual compensation rate of the highest wage earner in the organisation and the average percentage increase of the average wage:

Australia	Brazil	Chile	Spain	Mexico
-57.5%	-23.6%	-25.8%	-22.8%	-31.2%

The company ratio in 2022 was -41.6%.

Uses of water

(303-3, 303-4, 303-5)

Evolution of the use of water

	2019	2020	2021	2022
WATER TREATMENT AND DISTRIBUTION FOR CUSTOMERS (m³)				
Production at wastewater treatment plants discharged to surface water	364,710,907*	400,382,251	287,926,644	475,003,584
Production at wastewater treatment plants discharged into the sea	67,961,696*	61,172,270	67,377,699	73,782,113
Production at wastewater treatment plant for recycled water network	20,749,799	22,435,592	21,832,266	25,275,597
Production of drinking water at drinking water treatment plants	122,557,216	116,471,949	170,757,391	122,312,614
Production of drinking water at desalination plant	454,509,684	322,120,061	485,362,291	451,146,357
Supply of drinking water from primary network and groundwater sources	42,268,959	48,411,094	91,735,153	113,034,447

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TOTAL	1,072,758,262	970,993,218	1,124,991,444	1,260,554,712
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WATER FOR INTERNAL CONSUMPTION (m³)

On-site recycled/reused water	652,989	1,706,633	941,566	2,273,309
Recycled water from networks	492,621	505,960	505,163	567,559
Rainwater	33,825	22,017	353,345	272,186
Municipal drinking water	1,175,724	1,275,686***	1,586,926	1,964,768
Surface water	649,654	815,260	1,263,778	1,288,956
Groundwater	654,501	423,894	349,838	450,711
TOTAL	3,659,313	4,749,450	5,000,615	6,817,489

DISCHARGE (m³)

Discharge into the sea	511,008,634	524,140,447	842,957,678	721,312,482
Discharge to surface water	5,283,726**	3,907,563	3,547,566	6,268,178
Discharge into the sewer system	771,332**	468,278	1,263,686	3,112,052
TOTAL	517,063,692	528,516,288	847,768,930	730,692,712

* 128,052,494 m³ of production in water treatment plant discharged to the sea identified in 2019 was really production in water treatment plant discharged to surface water.

** 4,769,346 m³ of discharge to a sewer system identified in 2019 was really a discharge to surface water.

*** Figures restated after correcting an error in the water consumption for the Nevada Solar One thermosolar plant (USA).

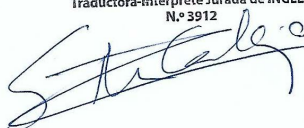
In addition to this consumption, ACCIONA carries out water transfer activities. This refers to water that enters and leaves facilities (hydroelectric and biomass plants) without generating any type of consumption and without the quality of the water or the ecosystems being affected in any significant way. For this reason they may not be considered consumption for the company.

The total amount of water transferred in 2022 in hydroelectric plants was 16,333,930,879 m³, whereas the amount of water used to cool the biomass plants and fully returned without physical or chemical alterations was 22,871,187 m³.

Evolution in the use of water in areas with water stress

	2019	2020	2021	2022
WATER TREATMENT AND DISTRIBUTION FOR CUSTOMERS (m³)				
Production at wastewater treatment plants discharged to surface water	128,052,494*	128,871,294	0	184,460,315
Production at wastewater treatment plants discharged into the sea	0*	0	0	0
Production at wastewater treatment plant for recycled water network	0	0	0	0
Production of drinking water at drinking water treatment plants	82,086,123	91,443,423	122,255,294	57,659,574
Production of drinking water at desalination plant	308,963,858	218,225,482	374,331,644	303,113,899
Supply of drinking water from primary network and	0	0	0	0

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groundwater sources

TOTAL	519,102,474	438,540,199	496,586,938	545,233,788
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WATER FOR INTERNAL CONSUMPTION (m³)

On-site recycled/reused water	552,990	234,371	0	1,206,375
Recycled water from networks	0	0	0	0
Rainwater	18	6	10,000	0
Municipal drinking water	76,771	87,345	94,767	86,925
Surface water	0	9,547	2,450	30
Groundwater	1,372	3,332	3,027	900
TOTAL	631,150	334,601	110,244	1,294,230

DISCHARGE (m³)

Discharge into the sea	317,310,367	387,920,203	702,027,346	524,289,479
Discharge to surface water	4,769,346**	3,100,576	383,933	90
Discharge into the sewer system	19,216**	17,807	574,785	845,616
TOTAL	322,098,929	391,038,586	702,986,064	525,135,185

* 128,052,494 m³ of production in water treatment plant discharged to the sea identified in 2019 was really production in water treatment plant discharged to surface water.

** 4,769,346 m³ of discharge to a sewer system identified in 2019 was really a discharge to surface water.

European taxonomy of environmentally sustainable economic activities

The active involvement of financial markets in funding the sustainable economy is indispensable for the European Union's plans to shift towards a low-carbon economy.

The EU taxonomy Regulation (EU Regulation 2020/852), which came into force on 12 July 2020, helps to create the world's first 'green list', a classification system for sustainable economic activities that will develop a common language for investors and companies when it comes to financing projects or goods and services with a substantial positive impact on the climate and the environment.

Article 8 of the Regulation establishes that any company required to publish non-financial information (under Directive 2013/34/EU), must include information on how and to what extent the company's activities are related to business dealings that are considered environmentally sustainable.

On 6 July 2021 the Commission Delegated Regulation (EU) 2021/2178 was published which complemented the Regulation (EU) 2020/852, establishing that in 2022 non-financial enterprises must "disclose the proportion of Taxonomy-eligible and Taxonomy non-eligible economic activities in their total turnover, investment in fixed assets and operational expenditure and the qualitative information referred to in Section 1.2. of Annex I relevant for this disclosure".

The proportion of eligible economic activities according to the taxonomy in 2022 was:

- Turnover: 51.11% eligible.
- OpEx: 63.28% eligible.
- CapEx: 86.29% eligible.

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In order to determine the proportions shown, on the basis of the financial statements reported by the company, the identification was carried out as per type of activity selecting the figures for each ratio, corresponding to activities identifiable with categories present in the Annexes of the Delegated Regulation (EU) 2021/2139, which defines the technical criteria for establishing when an economic activity is considered to contribute substantially to climate change mitigation and adaptation, as well as determining whether that activity does not significantly harm any of the other environmental objectives. To analyse the sustainable economic activities in ACCIONA, the turnover, CapEx and OpEx figures were analysed by cost centre, considering in all cases the natures contained in the Taxonomy Regulation. Once established, the figures selected were divided into the total figures.

To identify the factors of this calculation, the indications specified in Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account in relation to the international financial accounting standards. In particular:

For business turnover, the figures extracted relate to the definition given in article 2, sub-section 5, of Directive 2013/34/EU. It includes income recognised under International Accounting Standard (IAS) 1, paragraph 82, letter a), adopted by Commission Regulation (EC) no. 1126/2008 (Regulation (EC) no. 1126/2008 of 3 November 2008, under which certain International Accounting Standards were adopted in accordance with Regulation (EC) no. 1606/2002 of the European Parliament and the Council (DO L 320 of 29.11.2008, p. 1)).

For CapEx, the figures extracted relate to any additions to tangible or intangible assets during the year in question before depreciation, amortisation and any possible new valuations, including those resulting from revaluations and impairment, corresponding to the year in question, excluding any changes in fair value. That figure also includes any additions to tangible or intangible assets resulting from business combinations. The CapEx covers the costs accounted for in accordance with:

- a) IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
- b) IAS 38 Intangible Assets, paragraph 118, letter e), point i);
- c) IAS 40 Investment property, paragraph 76, letters a) and b), (for the fair value model);
- d) IAS 40 Investment property, paragraph 79, letter d), points i) and ii), (for the cost model);
- e) IAS 41 Agriculture, paragraph 50, letters b) and e);
- f) IFRS 16 Leases, paragraph 53, letter h).

Any leases that do not result in the recognition of a right to use the asset are not entered as CapEx.

For OpEx, the figures extracted relate to uncapitalised direct costs associated to research and development, building renovation measures, short term leases, maintenance and repairs, as well as any other direct expenses related to the daily maintenance of items of property, plant and equipment by the company or by a subcontracted third party and which are necessary for guaranteeing the ongoing effective functioning of those assets. The expense accounts associated to those figures that were used are those related to:

- ST Leases (<12 months).
- Repairs and conservation.
- R&D expenses for the year.

The company activities identified as eligible in the Annexes for mitigation and adaptation were the following:

- 1.2. Forest recovery and restoration, including natural reforestation and regeneration of forests after an extreme event.
- 1.3. Forest management.
- 3.3. Manufacture of low-carbon technologies for transport.
- 4.1. Electricity production using solar power technology.
- 4.2. Electricity production using concentrated solar power technology.
- 4.3. Electricity production using wind power technology.
- 4.5. Electricity production using hydroelectric power technology.
- 4.8. Electricity production from bioenergy.
- 4.9. Electricity transport and distribution.
- 4.10. Energy storage.

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- 5.1. Construction, extension and exploitation of water collection, purification and distribution systems.
- 5.2. Renovation of water collection, purification and distribution systems.
- 5.3. Construction, extension and exploitation of wastewater collection and treatment systems.
- 5.4. Renewal of the wastewater collection and treatment.
- 5.5. Non-hazardous waste collection and transport in fractions segregated at the point of origin.
- 5.9. Recovery of non-hazardous waste materials.
- 6.5. Transport by motorcycles, passenger cars and light commercial vehicles.
- 6.13. Infrastructure for personal mobility, logistics of bicycles.
- 6.14. Infrastructure for railway transport.
- 6.15. Infrastructure allowing low-carbon road and public transport.
- 6.17. Low-carbon airport infrastructure.
- 7.1. Construction of new buildings.
- 7.2. Refurbishment of existing buildings.
- 7.3. Installation, maintenance and repair of energy efficiency equipment.
- 7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings).
- 7.6. Installation, maintenance and repair of renewable energy technologies.
- 7.7. Acquisition and ownership of buildings.
- 9.1. Research, development and innovation close to the market.
- 9.3. Professional services related to the energy efficiency of buildings.

Different mechanisms have been implemented to ensure the avoidance of duplicate entries. In the first place, observance of the financial accounting standards referred to above makes it possible to guarantee that the figures associated to the same account are not used in two different indicators (this also applies to the accounts indicated for OpEx, for which no financial accounting standards are described). Secondly, the figures associated to intercompany elimination lines have been reduced to 0 and their amounts have been charged to the original lines that generated those amounts. Thirdly, no amount that has been attributed to an activity associated to the mitigation of climate change has been taken into consideration for activities associated to adaptation to climate change and vice versa.

On the other hand, the percentage of taxonomy-alignment out of the eligible figure of ACCIONA's activities in 2022 was as follows:

- Turnover: 77.46% alignment with eligible figure.
- OpEx: 89.23% alignment with eligible figure.
- CapEx: 97.96% alignment with eligible figure.

The criteria mentioned for the case of eligibility have been equally studied for alignment. Additionally, the assessment of compliance with the criteria established in article 3 of Regulation (EU) 2020/852 and the technical criteria for selection included in the delegated acts relating to climate change adaptation and mitigation objectives is diverse and varies for each of the activities identified. In general terms, the assessments carried out comprised one of the following activities: observing that the activity analysed is in line with the description given in the technical criteria, ascertaining whether the operating parameters of the activity are within the limits established, confirming the existence of internal procedures or tools for ensuring requirements are met, confirming that the activity under assessment is in line with the law.

The following pages show the results of the eligibility and alignment of ACCIONA's activities with taxonomy. They follow the format of the templates for the key indicators of results of non-financial undertakings under Annex II of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021. For the absolute figures of OpEx and CapEx below the specific definitions under Annex I of the Delegated Regulation (EU) 2021/2178 were taken into account, for which reason they may differ from the figures presented under the same heading in the company's financial statements.

As for last year's figures, it is worth mentioning the increase in the absolute value of the totals for turnover, OpEx and CapEx.

Regarding the turnover, the eligible figure has suffered a slight increase, which was more noticeable in the non-eligible figure. The greater concentration of eligible and aligned activities (mainly focused on wind power activities and urban and intercity railway infrastructure) has meant that the alignment figure out of the eligible figure shows a sharp rise.

As for the OpEx, the situation is similar to that mentioned for the turnover, but the increase in the eligible figure has been more remarkable and the most influential eligible activity is wind power generation.

Regarding the CapEx, the situation is similar to the one mentioned for the turnover, but the increase in the eligible figure is even more noticeable than for the OpEx, where the solar and wind power activities had the most weight in the total eligible figure.

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Taxonomy alignments per activity and environmental objective

Turnover				Criteria for substantial contribution		Criteria for the absence of significant harm ("Does not cause significant harm")							Proportion of taxonomy-compliant turnover (%) 2022	Proportion of taxonomy-compliant turnover (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)
Business activities	Codes	Absolute turnover (€)	Proportion of turnover (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)				
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1. Sustainable environmental activities (taxonomy-compliant)																
Manufacture of low-carbon technologies for transport	3.3	54,857,613	0.49%	0.49%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.96%	0.50%	F	
Electricity production using solar power technology	4.1	106,804,946	0.95%	0.95%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.87%	2.10%		
Electricity production using concentrated solar power technology	4.2	26,223,099	0.23%	0.23%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.46%	0.50%		
Electricity production using wind power technology	4.3	1,890,872,761	16.89%	16.89%	0.00%	Y	Y	Y	Y	Y	Y	Y	33.05%	24.29%		
Electricity production using hydroelectric power technology	4.5	334,729,171	2.99%	2.99%	0.00%	Y	Y	Y	Y	Y	Y	Y	5.85%	3.49%		
Electricity production from bioenergy	4.8	77,797,971	0.69%	0.69%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.36%	1.16%		
Electricity transport and distribution	4.9	330,049	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.01%	0.09%	F	
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	110,133,702	0.98%	0.98%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.92%	1.18%		
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	128,969,124	1.15%	1.15%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.25%	1.38%		
Non-hazardous waste collection and transport in fractions segregated at the point of origin	5.5	47,349,233	0.42%	0.42%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.83%	0.72%		
Transport by motorcycles, passenger cars and light commercial vehicles	6.5	13,788,618	0.12%	0.12%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.24%	0.18%		
Infrastructure for personal mobility, logistics of bicycles	6.13	754,195	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.01%	0.12%	F	
Infrastructure for railway transport	6.14	624,658,231	5.58%	5.58%	0.00%	Y	Y	Y	Y	Y	Y	Y	10.92%	14.95%	F	
Infrastructure allowing low-carbon road and public transport	6.15	690,022,468	6.16%	6.16%	0.00%	Y	Y	Y	Y	Y	Y	Y	12.06%	0.00%	F	
Construction of new buildings	7.1	247,259,331	2.21%	2.21%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.32%	2.60%		
Refurbishment of existing buildings	7.2	799,533	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.01%	0.00%		T
Installation, maintenance and repair of energy efficiency equipment	7.3	10,874,063	0.10%	0.10%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.19%	0.01%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	7.4	428,420	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.01%	0.00%	F	
Installation, maintenance and repair of renewable energy technologies	7.6	1,248,207	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.02%	0.20%	F	
Professional services related to the energy efficiency of buildings	9.3	64,579,392	0.58%	0.58%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.13%	0.26%	F	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		4,432,480,127	39.59%	39.59%	0.00%								77.46%	54.98%		
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																
Forest recovery and restoration, including natural reforestation and regeneration of forests after an extreme event	1.2	696,699	0.01%													
Forest management	1.3	973,193	0.01%													
Electricity production using wind power technology	4.3	23,064,903	0.21%													
Electricity production using hydroelectric power technology	4.5	60,899,403	0.54%													
Electricity transport and distribution	4.9	5,825,884	0.05%													
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	160,772,228	1.44%													
Renovation of water harvesting, purification and distribution systems	5.2	60,807,883	0.54%													
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	188,680,619	1.69%													
Recovery of non-hazardous waste materials	5.9	3,360,884	0.03%													
Infrastructure for personal mobility, logistics of bicycles	6.13	28,143	0.00%													
Infrastructure for railway transport	6.14	153,124,776	1.37%													
Infrastructure allowing low-carbon road and public transport	6.15	185,869,412	1.66%													
Low-carbon airport infrastructure	6.17	2,052,562	0.02%													
Construction of new buildings	7.1	413,501,327	3.69%													
Refurbishment of existing buildings	7.2	28,593,789	0.26%													
Acquisition and ownership of buildings	7.7	1,323,705	0.01%													
Turnover of taxonomy-eligible but not environmentally sustainable activities (not aligned with taxonomy) (A.2)		1,289,575,411	11.52%										22.54%	45.02%		
Total (A.1 + A.2)		5,722,055,538	51.11%										100%	100%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																
Turnover of taxonomy-non-eligible activities (B)		5,473,042,597	48.89%													
Total (A+B)		11,195,098,134	100%													

ACCIONA has estimated the indicators for the consolidated group in accordance with Article 8 of the Taxonomy Regulation. However, in order to reflect the spirit of the EU Taxonomy Regulation considering the vertical integration of our electric activity, when preparing the turnover KPI we have deemed it necessary to make a difference –within the energy retail carried out through the Group's utility– between the retail of energy produced by the different production sources and the rest of services for the availability, maintenance and safety of the supply.

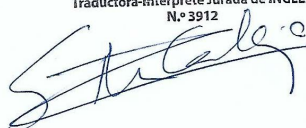
Based on the above, the turnover KPI in the table reported in this Non-financial Information Statement considers as eligible the retail of energy produced and sold to end customers through the Group's utility, which comes from renewable sources, as it is a vertically integrated activity.

In this regard, ACCIONA has established the control measures required to ensure the right use of the accounting consolidation principles when estimating the indicators, in line with the directions given in the interpretation and implementation guidelines in the Frequently Asked Questions (FAQs) published by the Commission Delegated Regulation (EU) (02/02/22 and 19/12/22) and the ESMA (26/02/21). In particular, for the turnover KPI, i) the Group has only used sales with external third parties to the Group for the calculation (considering the premise of vertical integration mentioned above); ii) has avoided the duplicate entry of revenue in its estimate, iii) and has ensured an analysis based on the Group's consolidated revenue data without including internal consumption or other non-eligible services.

Therefore, the total turnover reported for renewable energy production equals sales of €2,503M – generation (€1,848 non-generation) shown in Note 29 – Information by segments, of the 2022 consolidated financial statements.

OpEx				Criteria for substantial contribution		Criteria for the absence of significant harm ("Does not cause significant harm")										
Business activities	Codes	Absolute OpEx (€)	Proportion of OpEx (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (Y/N)	Adaptation to climate change (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum guarantees (Y/N)	Proportion of taxonomy-compliant CapEx (N) 2022	Proportion of taxonomy-compliant CapEx (N) 2021	Category (Indicator action) (P)	Category (Indicator action) (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1. Sustainable environmental activities (taxonomy-compliant)																
Manufacture of low-carbon technologies for transport	3.3	504,842	0.13%	0.13%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.21%	0.11%	F	
Electricity production using solar power technology	4.1	10,160,809	2.61%	2.61%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.13%	5.44%		
Electricity production using concentrated solar power technology	4.2	3,081,956	0.79%	0.79%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.25%	1.23%		
Electricity production using wind power technology	4.3	145,263,020	37.33%	37.33%	0.00%	Y	Y	Y	Y	Y	Y	Y	58.99%	43.97%		
Electricity production using hydroelectric power technology	4.5	16,620,543	4.27%	4.27%	0.00%	Y	Y	Y	Y	Y	Y	Y	6.75%	6.14%		
Electricity production from bioenergy	4.8	2,117,490	0.54%	0.54%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.86%	3.10%		
Electricity transport and distribution	4.9	1,816,741	0.47%	0.47%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.74%	0.00%	F	
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	1,910,812	0.49%	0.49%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.78%	0.73%		
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	2,818,420	0.72%	0.72%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.14%	1.22%		
Non-hazardous waste collection and transport in fractions segregated at the point of origin	5.5	1,249,967	0.32%	0.32%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.51%	0.40%		
Transport by motorcycles, passenger cars and light commercial vehicles	6.5	170,029	0.04%	0.04%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.07%	0.14%		
Infrastructure for personal mobility, logistics of bicycles	6.13	1,018	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.00%	0.03%	F	
Infrastructure for railway transport	6.14	7,246,507	1.86%	1.86%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.94%	6.32%	F	
Infrastructure allowing low-carbon road and public transport	6.15	24,613,498	6.32%	6.32%	0.00%	Y	Y	Y	Y	Y	Y	Y	10.00%	0.00%	F	
Construction of new buildings	7.1	820,151	0.21%	0.21%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.33%	0.51%		
Refurbishment of existing buildings	7.2	386,163	0.10%	0.10%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.16%	0.12%		T
Installation, maintenance and repair of energy efficiency equipment	7.3	39,867	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.02%	0.00%	F	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	7.4	56,736	0.01%	0.01%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.02%	0.00%	F	
Installation, maintenance and repair of renewable energy technologies	7.6	789,834	0.20%	0.20%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.32%	0.53%	F	
Professional services related to the energy efficiency of buildings	9.3	68,744	0.02%	0.02%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.03%	0.00%	F	
OpEx for sustainable environmental activities (taxonomy-compliant)(A.1)		219,737,147	56.46%	56.46%	0.00%								89.23%	71.05%		
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																
Forest management	1.3	56,497	0.01%													
Electricity production using wind power technology	4.3	2,654,351	0.68%													
Electricity production using hydroelectric power technology	4.5	1,230,630	0.32%													
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	2,260,931	0.58%													
Renovation of water harvesting, purification and distribution systems	5.2	2,228,329	0.57%													
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	4,356,258	1.12%													
Renewal of the wastewater collection and treatment	5.4	37	0.00%													
Recovery of non-hazardous waste materials	5.9	169,474	0.04%													
Infrastructure for railway transport	6.14	4,846,247	1.25%													
Infrastructure allowing low-carbon road and public transport	6.15	1,875,500	0.48%													
Low-carbon airport infrastructure	6.17	14,123	0.00%													
Construction of new buildings	7.1	4,199,094	1.08%													
Refurbishment of existing buildings	7.2	693,160	0.18%													
Acquisition and ownership of buildings	7.7	182,588	0.05%													
Research, development and innovation close to the market	9.1	1,752,747	0.45%													
OpEx for taxonomy-eligible activities but not environmentally sustainable (not compliant with taxonomy) (A.2)		26,519,966	6.81%										10.77%	28.95%		
Total (A.1 + A.2)		246,257,113	63.28%										100%	100%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																
OpEx for taxonomy non-eligible activities (B)		142,925,992	36.72%													
Total (A+B)		389,183,105	100%													

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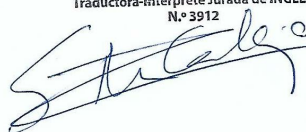
STATEMENT OF NON-FINANCIAL INFORMATION 2022

CapEx				Criteria for substantial contribution		Criteria for the absence of significant harm ("Does not cause significant harm")										
Business activities	Code	Absolute CapEx (€)	Proportion of CapEx (%)	Mitigation of climate change (%)	Adaptation to climate change (%)	Mitigation of climate change (V/N)	Adaptation to climate change (V/N)	Water and marine resources (V/N)	Circular economy (V/N)	Pollution (V/N)	Biodiversity and ecosystems (V/N)	Minimum guarantees (V/N)	Proportion of taxonomy-compliant CapEx (%) 2022	Proportion of taxonomy-compliant CapEx (%) 2021	Category (facilitator action) (F)	Category (transition action) (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES																
A.1. Sustainable environmental activities (taxonomy-compliant)																
Manufacture of low-carbon technologies for transport	3.3	14,199,412	0.65%	0.65%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.76%	3.75%	F	
Electricity production using solar technology	4.1	698,314,803	32.12%	32.12%	0.00%	Y	Y	Y	Y	Y	Y	Y	37.22%	32.58%		
Electricity production using concentrated solar power technology	4.2	46,048,536	2.12%	2.12%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.45%	0.05%		
Electricity production using wind power technology	4.3	582,820,503	26.81%	26.81%	0.00%	Y	Y	Y	Y	Y	Y	Y	31.07%	35.69%		
Electricity production using hydroelectric power technology	4.5	7,845,163	0.36%	0.36%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.42%	0.00%		
Electricity production from bioenergy	4.8	756,297	0.03%	0.03%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.04%	0.00%		
Electricity transport and distribution	4.9	520,677	0.02%	0.02%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.03%	0.00%	F	
Energy storage	4.10	230,138,402	10.59%	10.59%									12.27%	0.00%	F	
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	8,579,799	0.39%	0.39%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.46%	5.23%		
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	2,482,291	0.11%	0.11%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.13%	0.04%		
Non-hazardous waste collection and transport in fractions segregated at the point of origin	5.5	1,436,562	0.07%	0.07%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.08%	0.13%		
Transport by motorcycles, passenger cars and light commercial vehicles	6.5	976,905	0.04%	0.04%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.05%	0.51%		
Infrastructure for railway transport	6.14	1,394,785	0.06%	0.06%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.07%	2.23%	F	
Infrastructure allowing low-carbon road and public transport	6.15	48,893,443	2.25%	2.25%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.61%	0.01%	F	
Construction of new buildings	7.1	32,683,406	1.50%	1.50%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.74%	3.74%		
Refurbishment of existing buildings	7.2	39,421,140	1.81%	1.81%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.10%	7.33%		T
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)	7.4	3,732,533	0.17%	0.17%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.20%	0.95%	F	
Installation, maintenance and repair of renewable energy technologies	7.6	6,942,614	0.32%	0.32%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.37%	0.00%	F	
Professional services related to the energy efficiency of buildings	9.3	110,612,155	5.09%	5.09%	0.00%	Y	Y	Y	Y	Y	Y	Y	5.90%	0.91%	F	
CapEx for sustainable environmental activities (taxonomy-compliant) (A.1)		1,837,799,425	84.54%	84.54%	0.00%								97.96%	93.15%		
A.2. Taxonomy-eligible activities but not environmentally sustainable (activities not meeting taxonomy requirements)																
Forest recovery and restoration, including natural reforestation and regeneration of forests after an extreme event	1.2	1,228	0.00%													
Forest management	1.3	24,050	0.00%													
Electricity production using wind power technology	4.3	898	0.00%													
Electricity production using hydroelectric power technology	4.5	600,931	0.03%													
Construction, extension and exploitation of water harvesting, purification and distribution systems	5.1	1,333,604	0.06%													
Construction, extension and exploitation of wastewater collection and treatment systems	5.3	1,740,382	0.08%													
Recovery of non-hazardous waste materials	5.9	227,832	0.01%													
Infrastructure for railway transport	6.14	8,737,501	0.40%													
Infrastructure allowing low-carbon road and public transport	6.15	21,103,731	0.97%													
Construction of new buildings	7.1	2,288,053	0.11%													
Refurbishment of existing buildings	7.2	26,201	0.00%													
Acquisition and ownership of buildings	7.7	240,968	0.01%													
Research, development and innovation close to the market	9.1	1,904,248	0.09%													
CapEx for taxonomy-eligible activities but not environmentally sustainable (not compliant with taxonomy) (A.2)		38,229,628	1.76%										2.04%	6.85%		
Total (A.1 + A.2)		1,876,029,053	86.29%										100%	100%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																
CapEx for taxonomy non-eligible activities (B)		297,948,357	13.71%													
Total (A+B)		2,173,977,410	100%													

In 2022, ACCIONA Group, so as to comply with the reporting requirements set forth in the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, with reference to reporting the use of debt issued to fund specific activities identified compliant with the taxonomy and guidelines in the Q&A of 22/02/2022 by the European Commission, issued its Sustainable Funding Report for 2022.

In this report, the Group has detailed the list of green bonds and other securities that represent debt for ongoing green operations, as well as information on the return on its green funding, including the details of the assets funded, as well as the positive impacts produced by it on achieving the targets determined by the taxonomy regulation.

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GRI TABLE OF CONTENTS

GRI Standard	Content	Pages	Direct response or omission	External assurance
GRI 1: Foundation 2022				
GRI 2: General Disclosures 2022				
2-1	Organisation details	8	ACCIONA S.A. Private company listed on stock exchanges Av. Europa 18, Alcobendas, Spain	✓
2-2	Entities included in the organization's sustainability report	<i>Consolidated Financial Statements 2022</i> (Appendix I, II, III)		✓
2-3	Reporting period, frequency and contact		2022 (calendar year ending on 31 December) Reporting cycle Contact: responsabilidadcorporate@acciona.es	✓
2-4	Restatements of information	74,76,77,78	The metric unit used to report the figures on the tables has changed since last year.	✓
2-5	External assurance		All of the information concerning the GRI Standards of this table of contents has been externally audited	✓
2-6	Activities, value chain and other business relationships	3-8, 173		✓
2-7	Employees	24, 174-178		✓
2-8	Workers who are not employees	24, 174-178		✓
2-9	Governance structure and composition	10-11, 97-102 Corporate Governance Report 2022 (Sub-sections C1.2, C1.3 and C2.1)		✓
2-10	Nomination and selection of the highest governing body	<i>Corporate Governance Report 2022</i> (Sub-section C1.16)		✓
2-11	Chair of the highest governing body	97-102 <i>Corporate Governance Report 2022</i> (Sub-section C1.3)		✓
2-12	Highest governing body's role in overseeing impact management	10-11 <i>Corporate Governance Report 2022</i> (Sub-section C2.1)		✓
2-13	Delegation of responsibility for managing impacts	10-11 <i>Corporate Governance Report 2022</i> (Sub-sections C1.3 and C2.1)		✓
2-14	Highest governing body's role in sustainability reporting	10-11		✓

2-15	Conflicts of interest	Corporate Governance Report 2022 (Sub-section D6)	✓
2-16	Communication of critical concerns	15-17, 102-109	✓
2-17	Collective knowledge of highest governing body	10	✓
2-18	Evaluation of the performance of the highest governing body	Corporate Governance Report 2022 (Sub-section C1.17)	✓
2-19	Remuneration policies	101-102 Annual Report on Directors' remunerations for the 2022 financial year (Section A)	✓
2-20	Process for determining remuneration	101-102 Annual Report on Directors' remunerations for the 2022 financial year (Section A)	✓
2-21	Annual total compensation ratio	181-182	✓
2-22	Statement on sustainable development strategy	3-5	✓
2-23	Commitments and policies	11	✓
2-24	Embedding policies and commitments	11-13	✓
2-25	Processes to remedy negative impacts	54-62	✓
2-26	Mechanisms for seeking advice and raising concerns	102-109	✓
2-27	Compliance with laws and regulations	102-109	✓
2-28	Membership associations	126-130	✓
2-29	Approach to stakeholder engagement	14, 147-151, 144-155	✓
2-30	Collective bargaining agreements	53-54	✓
GRI 3: Material topics 2022			
3-1	Process to determine material topics	14-17	✓
3-2	List of material topics	14-17, 171-172	✓

GRI Standard	Content	Pages	Direct response or omission	External assurance
TALENT DEVELOPMENT				
GRI 3: Material topics 2022				
3-3	Management of material topics	25-26		✓
GRI 401: Labour 2016				
401-1	New employee hires and employee turnover	29-30, 41-42, 178-179		✓
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	27-29		✓
401-3	Parental leave	179-180		✓
GRI 404: Training & Education 2016				
404-1	Average hours of training per year per employee	51, 180		✓
404-2	Programmes for upgrading employee skills and transition assistance programmes	50-53		✓
404-3	Percentage of employees receiving regular	25-26		✓

GRI Standard	Content	Pages	Direct response or omission	External assurance
	performance and career development reviews			
GRI 202: Market Presence 2016				
202-1	Ratios of standard entry level wage by gender compared to local		The average minimum salary is higher than the national minimum wage across the entire company.	✓
202-2	Proportion of senior management hired from the local community	177-178		✓
DIVERSITY AND WORKING CONDITIONS				
GRI 3: Material topics 2022				
3-3	Management of material topics	31-39		✓
GRI 405: Diversity and equal opportunity 2016				
405-1	Diversity of governing bodies and employees	31-39, 100, 174-178		✓
405-2	Ratio of basic salary and remuneration of women to men	35-36, 180-181		✓
HEALTH AND SAFETY				
GRI 3: Material topics 2022				
3-3	Management of material topics	42-50		✓
GRI 403: Occupational Health & Safety 2018				
403-1	Occupational health and safety management system	42-45, 47-48		✓
403-2	Hazard identification, risk assessment and incident investigation	42-45		✓
403-3	Occupational health services	47-48		✓
403-4	Worker participation, consultation and communication on occupational health and safety	48-49		✓
403-5	Worker training on occupational health and safety	49		✓
403-6	Promotion of workers' health	28-29, 47		✓
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	42-43, 48-49		✓
403-8	Workers covered by an occupational health and safety management system	48		✓
403-9	Work-related injuries	45-50		✓
403-10	Work-related ill health	47-48		✓
RESPECT FOR HUMAN RIGHTS				
GRI 3: Material topics 2022				
3-3	Management of material topics	54-62		✓
GRI 406: No discrimination 2016				
406-1	Cases of discrimination and corrective measures undertaken	105-106		✓
GRI 407: Freedom of Association and Collective Bargaining 2016				
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	17-20, 54-62		✓
GRI 408: Child Labour 2016				
408-1	Operations and suppliers at significant risk for incidents of child labour	17-20, 54-62, 133-134		✓
GRI 409: Forced or Compulsory Labour 2016				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	17-20, 54-62, 133-134		✓
GRI 410: Security Practices 2016				
410-1	Security personnel trained in human rights policies or procedures	60, 140-141		✓
GRI 412: Evaluation of human rights 2016				

GRI Standard	Content	Pages	Direct response or omission	External assurance
412-1	Operations that have been subject to human rights reviews or impact assessments	17-19, 54-62, 140-141		✓
412-2	Employee training on human rights policies or procedures	59-60		✓
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	54-62, 133-134		✓
ADAPTATION TO CLIMATE CHANGE				
GRI 3: Material topics 2022				
3-3	Management of material topics	64-79		✓
MITIGATION OF CLIMATE CHANGE				
3-3	Management of material topics	64-79		✓
GRI 302: Energy 2016				
302-1	Energy consumption within the organisation	76-77		✓
302-2	Energy consumption outside of the organisation	77-78		✓
302-3	Energy intensity	77		✓
302-4	Reduction of energy consumption	70-72		✓
302-5	Reductions in energy requirements of products and services	70-72		✓
GRI 305: Emissions 2016				
305-1	Direct (Scope 1) GHG emissions	73-74		✓
305-2	Energy indirect (Scope 2) GHG emissions	73-74		✓
305-3	Other indirect (Scope 3) GHG emissions	74-75		✓
305-4	GHG emission intensity	74-75		✓
305-5	Reduction of GHG emissions	70-72		✓
305-6	Emissions of ozone-depleting substances (ODS)		Not applicable: ACCIONA does not use ozone-depleting gases in its facilities.	
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	75-76		✓
CONSERVATION OF BIODIVERSITY AND ECOSYSTEMS				
GRI 3: Material topics 2022				
3-3	Management of material topics	88-93		✓
GRI 304: Biodiversity 2016				
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	92		✓
304-2	Significant impacts of activities, products, and services on biodiversity	92-93		✓
304-3	Habitats protected or restored	89-92		✓
304-4	UCN Red List species and national conservation list species with habitats in areas affected by operations	93		✓
SCARCITY OF WATER				
GRI 3: Material topics 2022				
3-3	Management of material topics	79-83		✓
GRI 303: Water and effluents 2018				
303-1	Interactions with water as a shared resource	79-83		✓
303-2	Management of water discharge-related impacts	82-83		✓
303-3	Water withdrawal	79-83, 182-184		✓
303-4	Water discharge	79-83, 182-184		✓
303-5	Water consumption	79-83, 182-184		✓

GRI Standard	Content	Pages	Direct response or omission	External assurance
CIRCULAR ECONOMY				
GRI 3: Material topics 2022				
3-3	Management of material topics	83-87		✓
GRI 306: Waste 2020				
306-1	Waste generation and significant waste-related impacts	86-87		✓
306-2	Management of significant waste-related impacts	84-85, 87		✓
306-3	Waste generated	86-87		✓
306-4	Waste diverted from disposal	86-87		✓
306-5	Waste directed to disposal	86-87		✓
GRI 301: Materials 2016				
301-1	Materials used by weight or volume	86		✓
301-2	Recycled input materials used	86-87		✓
301-3	Reclaimed products and their packaging materials	86-87		✓
ETHICS AND ANTI-CORRUPTION				
GRI 3: Material topics 2022				
3-3	Management of material topics	102-109		✓
GRI 205: Anti-corruption 2016				
205-1	Operations assessed for risks related to corruption	102-108		✓
205-2	Communication and training about anti-corruption policies and procedures	105-107		✓
205-3	Confirmed incidents of corruption and actions taken	106		✓
GRI 415: Public policy 2016				
415-1	Political contributions	104, 108-109		✓
GRI 206: Anti-competitive behaviour 2016				
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	107-108		✓
CORPORATE GOVERNANCE				
GRI 201: Economic performance 2016				
201-1	Direct economic value generated and distributed	<i>Consolidated Financial Statements 2022</i> (p. 4-9)		✓
201-2	Financial implications and other risks and opportunities due to climate change	66-69		
201-3	Defined benefit plan obligations and other retirement plans	<i>Consolidated Financial Statements 2022</i> Pages 55-56		✓
201-4	Financial assistance received from government	111-112		
RESPONSIBLE TAXATION				
GRI 3: Material topics 2022				
3-3	Management of material topics	110-113		✓
GRI 207: Tax 2019				
207-1	Approach to tax	110-111		✓
207-2	Tax governance, control and risk management	110-111		✓
207-3	Stakeholder engagement and management concerns related to tax	111-113		✓
207-4	Country-by-country reporting	112	The content required under GRI 207-4.b.v and GRI 207-4.b.vii involves unavailable information. The company will disclose this information in future years.	✓

GRI Standard	Content	Pages	Direct response or omission	External assurance
CONDITIONS OF THE SUPPLY CHAIN				
GRI 3: Material topics 2022				
3-3	Management of material topics	130-142		✓
GRI 204: Procurement impacts 2016				
204-1	Proportion of spending on local suppliers	131		✓
GRI 308: Supplier Environmental Assessment 2016				
308-1	New suppliers that were screened using environmental criteria	132-134		✓
308-2	Negative environmental impacts in the supply chain and actions taken	138-142		✓
GRI 414: Supplier Social Assessment 2016				
414-1	New suppliers that were screened using social criteria	132-134		✓
414-2	Negative social impacts in the supply chain and actions taken	138-142		✓
CLIENTS AND FAIR TRADE				
GRI 3: Material topics 2022				
3-3	Management of material topics	119-126		✓
GRI 416: Customer Health and Safety 2016				
416-1	Assessment of the health and safety impacts of product and service categories	123-124		✓
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	124		✓
GRI 417: Marketing and Labelling 2016				
417-1	Requirements for product and service information and labelling	124		✓
417-2	Incidents of non-compliance concerning product and service information and labelling	124		✓
417-3	Incidents of non-compliance concerning marketing communications	124		✓
CYBERSECURITY				
GRI 3: Material topics 2022				
3-3	Management of material topics	113		✓
GRI 418: Customer Privacy 2016				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	113		✓
DEVELOPMENT OF LOCAL COMMUNITIES				
GRI 3: Material topics 2022				
3-3	Management of material topics	147-152		✓
GRI 203: Indirect Economic Impacts 2016				
203-1	Infrastructure investments and services supported	145-147		✓
203-2	Significant indirect economic impacts	20-21, 153-154		✓
GRI 413: Local Communities 2016				
413-1	Operations with local community engagement, impact assessments and development programmes	147-150		✓
413-2	Operations with significant actual and potential negative impacts on local communities	147-150		✓
DEVELOPMENT OF SUSTAINABLE FINANCES				
GRI 3: Material topics 2022				
3-3	Management of material topics	155-158		✓

GRI Standard	Content	Pages	Direct response or omission	External assurance
INNOVATION IN THE INDUSTRY				
GRI 3: Material topics 2022				
3-3	Management of material topics	114-119		✓
TRANSPARENCY AND DIALOGUE				
GRI 3: Material topics 2022				
3-3	Management of material topics	128-129		✓

TABLE OF CONTENTS OF SPANISH LAW 11/2018

Questions addressed by Spanish Law 11/2018 on the disclosure of non-financial and diversity information: material topics for ACCIONA and reporting criteria.

		Section	GRI Standards Reporting Criteria	Pages
General Topics				
Business Model	Brief description of the group's business model	We challenge the present to make the future possible	GRI 2-6	3-5
	Markets where it operates	We challenge the present to make the future possible	GRI 2-1 GRI 2-6	6-8
	Organisational objectives and strategies	We challenge the present to make the future possible	GRI 2-6	3-5
	Key factors and trends that could affect the future outlook	We challenge the present to make the future possible	GRI 2-6	3-4, 67, 69
General	Reporting framework	About this Report	GRI 1	169-170
Management Approach	Description of applied policies	Governance of sustainability and materiality	GRI 2-23 GRI 2-24	11-12
	Results of these policies	Governance of sustainability and materiality	GRI 3-3	13
	Main risks related to those aspects linked to the group's activities	Governance of sustainability and materiality	GRI 2-16	19, 67
Environmental matters				
Environmental management	Current and foreseeable effects of the business activities on the environment and, where applicable, on health and safety	Planet positive	GRI 3-3	94-95
	Environmental assessment or certification procedures	Planet positive	GRI 3-3	94-95
	Resources dedicated to the prevention of environmental risks	Planet positive	GRI 3-3	94-95
	Application of the precautionary principle	Planet positive	GRI 3-3	94-95
	Number of provisions and guarantees for environmental risks	Planet positive	GRI 3-3	95
Pollution	Measures to prevent, reduce or repair carbon emissions	Planet positive	GRI 305-5	70, 72
Circular economy and waste prevention and management	Measures for prevention, recycling, reuse, other forms of recovery and disposal	Planet positive	GRI 306-2 (version 2020)	83-84
	Actions to combat food waste	Planet positive	-	See note ¹²
Sustainable use of resources	Water usage and water supply according to local constraints	Planet Positive and Annex of itemized	GRI 303-5 (version 2018)	79-83, 182-183

¹² Due to the nature of ACCIONA's business and based on the materiality study, the information required is not considered relevant to this report.

		indicators		
	Consumption of raw materials and measures taken for more efficient use	Planet positive	GRI 303-1	83-85
	Direct and indirect energy consumption	Planet positive	GRI 302-1	76-78
	Measures taken to improve energy efficiency	Planet positive	GRI 302-4	72-73
	Use of renewable energies	Planet positive	GRI 302-1	76-77, 78-79
Climate change	Important elements of greenhouse gas emissions generated as a result of the company's activities	Planet positive	GRI 305-1 GRI 305-2 GRI 305-3	73-75
	Measures taken to adapt to the consequences of climate change	Planet positive	GRI 201-2 TCFD ¹³	64-69
	Voluntary medium and long-term reduction targets set to reduce greenhouse gas emissions and the measures implemented to that end	Planet positive	GRI 305-4 GRI 305-5	64, 70
Protecting biodiversity	Steps taken to preserve or restore biodiversity	Planet positive	GRI 304-3	88-92
	Impacts caused by activities or operations in protected areas	Planet positive	GRI 304-1	92-93
Social and personnel-related questions				
Employment	Total number and breakdown of employees by country, gender, age, and professional category	People centric and Annex of itemized Indicators	GRI 2-7 GRI 405-1	24, 174-178
	Total number and breakdown of types of employment contracts	Annex of itemized indicators	GRI 2-7 GRI 405-1	174-178
	Annual average per type of contract (permanent, temporary and part-time) and by gender, age and professional category	Annex of itemized indicators	GRI 2-7 GRI 405-1	174-178
	Number of terminations by gender, age and professional category	Annex of itemized indicators	GRI 401-1	178
	Gender pay gap	People centric and Annex of itemized Indicators	GRI 405-2	35-36, 180-181
	Disaggregated average salaries and their evolution by gender, age, professional category or equal value	People centric and Annex of itemized Indicators	GRI 405-2	180-181
	Average remuneration of directors and executives, including variable remuneration, allowances, compensation, payments to long-term savings schemes and any other benefits disaggregated by gender	Annex of itemized indicators	GRI 405-2	180-181
	Implementation of workplace disconnection policies	People-centric	GRI 3-3	40-41
	Employees with disabilities	People-centric	GRI 405-1	36-37
	Working hours organisation	People-centric	GRI 3-3	39-41
Organisation of work	Hours of absenteeism	People-centric	GRI 403-9 (Version 2018)	41
	Measures intended to promote work-life balance and co-responsible parenting by both parents	People centric and Annex of itemized Indicators	GRI 401-2 GRI 401-3	40-41, 179-180
Health and safety	Health and safety conditions in the workplace	People-centric	GRI 403-1 GRI 403-2 GRI 403-3 GRI 403-7 (Version 2018)	42-50
	Workplace accidents, in particular frequency and severity, disaggregated by gender	People-centric	GRI 403-9 GRI 403-10 (Version 2018)	45-46, 50
	Occupational diseases, disaggregated by gender	People-centric	GRI 403-9 GRI 403-10 (Version 2018)	47
Labour relations	Dialogue in the workplace, including procedures to inform, consult and negotiate with employees.	People-centric	GRI 3-3	53-54
	Percentage of employees covered under collective bargaining agreement, by country	People-centric	GRI 2-30	53-54
	The balance of collective bargaining agreements, particularly in the areas of occupational health and safety	People-centric	GRI 403-3	49, 53

¹³ TCFD: the information on climate change included in the report is consistent in all material aspects with the recommendations made by the "Task-force on Climate-related Financial Disclosures" (TCFD).

Training	Training policies implemented	People-centric	GRI 404-2	50-53
	Total hours of training per professional category	People centric and Annex of itemized Indicators	GRI 404-1	51, 180
Accessibility	Universal accessibility for people with disabilities	People-centric	GRI 3-3	36-39
Equality	Measures taken to promote equal treatment and opportunities for women and men	People-centric	GRI 3-3	31-35
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March on effective equality for men and women)	People-centric	GRI 3-3	32-33
	Measures adopted to promote employment, protocols against sexual and gender-based harassment, integration and universal accessibility for persons with disabilities	People-centric	GRI 3-3	31-39
	Policy against all types of discrimination and, where appropriate, diversity management.	People-centric	GRI 3-3	11, 31
Information on respect for human rights				
Human rights	Application of due diligence procedures in the area of human rights, preventing the risk of human rights violations and measures to mitigate, manage and repair possible abuse	People-centric	GRI 2-25 GRI 412-1	54-62
	Human rights violations reported	People-centric	GRI 406-1	61-62
	Promotion of and compliance with the provisions of the fundamental conventions of the International Labour Organisation regarding freedom of association and the right to collective bargaining, the elimination of job discrimination, the elimination of forced labour and the effective abolition of child labour.	People centric, Exponential Leadership and GRI table of contents	GRI 406-1 GRI 407-1 GRI 408-1 GRI 409-1	54-62
Disclosures on the fight against corruption and bribery				
Corruption and bribery	Measures adopted to prevent corruption and bribery	Exponential leadership	GRI 3-3 GRI 205-2	102-107
	Measures for the prevention of money laundering	Exponential Leadership and GRI table of contents	GRI 3-3 GRI 205-2	102-107
	Contributions to foundations and non-profit organisations	Exponential leadership	GRI 2-28 GRI 201-1	108-109
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The company's commitment to sustainable development	The impact of the company's operations on local employment and development	Integrate to transform	GRI 203-2	144-147
	The impact of the company's operations on local resident and the territory	Integrate to transform	GRI 413-1 GRI 413-2	147-153
	Relations with key members of local communities and ways of dialogue with them	Integrate to transform	GRI 2-29 GRI 413-1	147-153
	Partnership and sponsorship actions	Integrate to transform	GRI 201-1	152-153
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy	Exponential leadership	GRI 308-1 GRI 414-1	130-142
	Consideration of social and environmental responsibility in relations with suppliers and subcontractors	Exponential leadership	GRI 308-1 GRI 414-1	130-142
	Supervision systems and audits and their result	Exponential leadership	GRI 308-1 GRI 414-1	139-141
Consumers	Measures to promote consumer health and safety	Exponential leadership	GRI 416-1	123-125
	Complaint procedures, complaints received and complaint resolution	Exponential leadership	GRI 418-1	121-122
Tax Information	Profits earned country-by-country	Exponential leadership	GRI 201-1	112
	Corporate income tax paid	Exponential leadership	GRI 207-4	112
	Public grants received	Exponential leadership	GRI 201-4	112
Taxonomy Regulation requirements		Planet Positive and Annex of itemized indicators	EU Regulation 2020/852	70-71, 184-189

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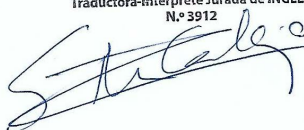


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**opportunity
management**

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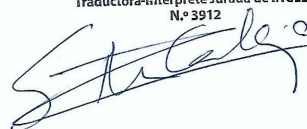


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ACCIONA follows the TCFD recommendations regarding publication of information relating to climate change in the heading “Climate” of the chapter “Planet Positive”.

Areas	Recommended reports	Pages
Governance	Describe the management’s role in assessing and managing climate-related risks and opportunities.	17
	Describe the board’s oversight of climate-related risks and opportunities.	17
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	66-69
	Describe the impact of climate-related risks and opportunities on the organisation’s businesses, strategy and financial planning.	66-69
	Describe the resilience of the organisation’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	66-69
Risk Management	Describe the organisation’s processes for identifying and assessing climate-related risks.	65
	Describe the organisation’s processes for managing climate-related risks.	65
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation’s overall risk management.	65
Metrics and Targets	Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	70-79
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	70-79
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	70-79

I, SARA JANE CALLEJO PATERSON, SWORN TRANSLATOR-INTERPRETER OF ENGLISH, WITH NUMBER 3912, DULY APPOINTED BY THE SPANISH MINISTRY OF FOREIGN AFFAIRS, CERTIFY THAT THE FOREGOING TEXT IS A TRUE AND COMPLETE TRANSLATION INTO SPANISH OF A DOCUMENT WRITTEN IN SPANISH.

YO, SARA JANE CALLEJO PATERSON, TRADUCTORA-INTÉRPRETE JURADA DE INGLÉS, CON NÚMERO 3912, NOMBRADA POR EL MINISTERIO DE ASUNTOS EXTERIORES, UNIÓN EUROPEA Y COOPERACIÓN, CERTIFICO QUE LA QUE ANTECEDE ES TRADUCCIÓN FIEL Y COMPLETA AL ESPAÑOL DE UN DOCUMENTO REDACTADO EN ESPAÑOL.

MADRID 31 MARCH 2023 / MADRID, 31 DE MARCH DE 2023.

SIGNED/FIRMADO: SARA JANE CALLEJO PATERSON

SARA JANE CALLEJO PATERSON
Traductora-Intérprete Jurada de INGLÉS
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Independent Assurance Report on the Statement of Non-financial Information of ACCIONA, S.A. and subsidiaries for 2022

(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

To the Shareholders of ACCIONA, S.A.:

We have been engaged by ACCIONA, S.A. management to perform an assurance review of the accompanying Statement of Non-financial Information (hereinafter the Report) of ACCIONA, S.A. (hereinafter the Parent) and subsidiaries (hereinafter the Group) for the year ended 31 December 2022, which contains the Group's Consolidated Non-Financial Information Statement (hereinafter, the NFIS) which forms an integral part of the Group's Consolidated Directors' Report for 2022.

Scope of our review

The scopes that we applied in our assurance review of the content of the Report are as follows:

- a. We have performed a reasonable assurance review of the preparation and presentation of the indicators included in the Report relative to GRI 301-1, GRI 301-2, GRI 302-1, GRI 302-3, GRI 303-5, GRI 305-1, GRI 305-2, GRI 305-4, GRI 305-7, GRI 306-3, GRI 306-4, GRI 306-5, GRI 405-1 and GRI 403-9, in accordance with the Sustainability Reporting Standards of the Global Reporting Initiative (hereinafter, GRI Standards), as described in the "About this report" Appendix of the Report.
- b. We have performed a limited assurance review of the preparation and presentation of the remaining GRI indicators of the Report, not included in the list above, in accordance with GRI standards, as described in the "About this report" Appendix of the Report.
- c. In addition, pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the preparation and presentation of the Group's NFIS for the year ended 31 December 2022, included in the Report, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the "Table of contents of Spanish Law 11/2018" of the Report, and in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) regarding information on climate change, and Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (hereinafter, the Regulation (EU)), regarding information on alignment indicators.

The Report includes additional information to that required by GRI Standards and prevailing mercantile legislation concerning non-financial information, which has not been the subject of our assurance work. In this respect, our work was limited exclusively to providing assurance on the information contained in the "GRI Table of Contents" and the "Table of contents of Spanish Law 11/2018" sections of the accompanying Report.



(Translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails.)

Responsibility of the Parent's Directors and Management

The Directors of the Parent are responsible for the content and authorisation for issue of the NFIS included in the Report, which forms an integral part of the Group's consolidated Directors' Report for 2022. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area in the "Table of contents of Spanish Law 11/2018" section of the Report and the recommendations of the Task Force on Climate-Related Financial Disclosures (hereinafter, TCFD) regarding information on climate change.

Management of the Parent is responsible for the preparation and presentation of the rest of the content of the Report, prepared in accordance with GRI Standards, based on the content indicated for each subject area in the "GRI Table of Contents" section of the Report.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the Report is free from material misstatement, whether due to fraud or error.

The Directors of the Parent are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the Report was obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies prevailing international quality standards and accordingly maintains a quality system including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team was comprised of professionals specialised in reviews of non-financial information and, specifically, in information on economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent assurance report based on the work performed, and considering the different scopes described in the "Scope of our Review" section of this report.

We conducted our review engagement in accordance with the requirements of the Revised International Standard on Assurance Engagements 3000, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 (Revised)), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines for assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Registered Auditors (ICJCE).



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Review of GRI Indicators with Reasonable Assurance

ISAE 3000 (Revised) requires that we plan and perform our procedures to obtain reasonable assurance on whether the indicators described in point a) of the “Scope of our Review” section of this report, have been prepared and presented, in all material respects, on the basis of GRI standards.

Our reasonable assurance work depends on our professional judgement, including the assessment of the risks of material misstatement of the indicators, whether due to fraud or error.

In making those risk assessments, we have considered internal control relevant to the preparation and presentation of the indicators with reasonable assurance, in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of the Group’s internal control over the preparation and presentation of the Report.

Our engagement included assessing the alignment of the indicators with the criteria of the GRI standards, understanding how the financial and non-financial information was obtained from source, evaluating the reasonableness of estimates made by the Group, and recalculating the indicators subject to reasonable assurance review.

Reasonable assurance is less than absolute assurance.

Review of Information with Limited Assurance

ISAE 3000 (Revised) requires that we plan and perform our procedures to obtain limited assurance on whether:

- the indicators described in point b) of the “Scope of our Review” section of this report, have been prepared and presented, in all material respects, in accordance with the GRI standards, as described in the “About this report” Appendix of the Report.
- the NFIS referred to in section c) of the “Scope of our Review” section of this report, has been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the “Table of contents of Spanish Law 11/2018” of the Report and the TCFD recommendations regarding information on climate change, and Regulation (EU) regarding information on alignment indicators.

The procedures selected depend on our knowledge of the different types of information included in the Report and other circumstances of the engagement, and our consideration of areas where it is probable that material misstatements will arise.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement, and consequently, the level of assurance obtained is substantially lower.

Our limited review work on the information consisted of making inquiries of management of the Parent, as well as of the different units and areas of the Group that participated in the preparation of the Report, reviewing the processes for compiling and validating the information presented in the Report and applying certain analytical procedures and sample review tests, which are described below:

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- Meetings with Group personnel to gain an understanding of the business model, the policies and management approaches applied, the main risks related to those questions, as well as of the existence of a sustainability strategy and policies to address the risks and their implementation at all levels of ACCIONA, thus obtaining the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the Report based on the materiality analysis performed by the Group and described in the “materiality analysis” section, considering the content required by prevailing mercantile legislation.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the Report for 2022, in accordance with the requirements of GRI standards.
- Review of the management approaches and of the presentation of information on climate risks and its alignment with TCFD recommendations.
- Review of the Regulation (EU) alignment indicators in accordance with the criteria and processes defined by the Parent.
- Analysis of the processes for compiling and validating the data presented in the Report for 2022.
- Corroboration, through sample testing, of the information relative to the content of the Report for 2022 and whether it has been adequately compiled based on data provided by the information sources.
- Perusal of the information included in the Report to determine whether it is consistent with our general knowledge and experience, in relation to ACCIONA’s sustainability performance.
- Corroboration of the financial information included in the Report with that contained in ACCIONA’s consolidated annual accounts for 2022, audited by independent third parties.
- Review of the reporting process from source for environmental and health and safety information at nine work centres, through remote and in situ visits and reviews, selected based on a risk analysis, and taking into account quantitative and qualitative criteria.
- Procurement of a representation letter from the Directors and management.

Conclusions

Our conclusions are based on, and are subject to, the matters described in this report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions.

Conclusion on GRI Indicators with Reasonable Assurance

In our opinion, the indicators included in the Report relative to GRI 301-1, GRI 301-2, GRI 302-1, GRI 302-3, GRI 303-5, GRI 305-1, GRI 305-2, GRI 305-4, GRI 305-7, GRI 306-3, GRI 306-4, GRI 306-5, GRI 405-1 and GRI 403-9, have been prepared and presented, in all material respects, in accordance with the GRI Standards, as described in the “About this report” Appendix of the Report.



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Conclusion on Information with Limited Assurance

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that:

- a) The indicators described in point b) of the "Scope of our Review" section of this report and described in the "GRI Table of Contents" section of the Report, have not been prepared and presented, in all material respects, in accordance with GRI standards, as described in the "About this report" Appendix of the Report.
- b) The NFIS of ACCIONA, S.A. and its subsidiaries for the year ended 31 December 2022, has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected GRI Standards for each subject area in the "Table of contents of Spanish Law 11/2018" of the Report, the TCFD recommendations regarding information on climate change, and Regulation (EU) regarding information on alignment indicators.

Emphasis of Matter

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment stipulates the obligation to disclose information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable and are aligned with climate change mitigation and climate change adaptation. The Directors of ACCIONA, S.A have included information on the criteria that, in their opinion, best allow them to comply with the aforementioned obligation, which are defined in the "European taxonomy of environmentally sustainable economic activities" Appendix of the accompanying Report. Our conclusion is not modified in respect of this matter.

Use and Distribution

In accordance with the terms of our engagement letter, this Report has been prepared for ACCIONA, S.A. in relation to its Statement of Non-financial Information 2022 and for no other purpose or in any other context.

In relation to the Consolidated NFIS, this report has been prepared in response to the requirement established in prevailing mercantile legislation in Spain, and thus may not be suitable for other purposes and jurisdictions.

KPMG Asesores, S.L.

(Signed on original in Spanish)

Patricia Reverter Guillot

27 February 2023