

DIVERSITY, EQUITY AND INCLUSION POLICY

STATEMENT OF INTENT

ACCIONA understands and promotes diversity as a key competitive advantage and equity and inclusion as priority responsibilities in its people management model, which, at the same time, are essential conditions for the defence of human rights, sustainable development and achieving Agenda 2030.

ACCIONA aims to be the leading employer in places where it operates, for which it promotes a culture based on leadership, recognition, diversity and facilitating work environments for people. This policy develops commitment to diversity, which includes the company's commitments to developing diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion through inclusion.

ACCIONA understands by **Diversity** the set of visible and non-visible characteristics that make people unique and special; by **Equity** that all people receive fair and impartial treatment and have access, support and resources so that they can succeed; and by **Inclusion** the strategy that highlights the individual characteristics of everyone in the organisation and that creates opportunities so that they can all participate, favouring a diverse and inclusive environment that promotes respect, safety, performance, well-being, belonging and commitment.

ACCIONA is a global company aware of its role in the local communities in which it operates. Therefore, and in accordance with its Code of Conduct and its policies, it respects and promotes these same values in the local communities in order to create a positive impact on their lives.

PRINCIPLES

This policy is applicable to ACCIONA's business activity, as well as all its commercial relations, promoting the application of these diversity and inclusion principles by its business partners, including its suppliers, contractors, customers and partners.

- **Respect for people**– ACCIONA promotes and recognises the knowledge, experience and skills of the people that make up the company, irrespective of their personal or social circumstances, so that they are respected and valued, allowing them to achieve their full potential. It therefore undertakes to maintain an environment based on respect and fair treatment with a zero tolerance to all types of harassment or other discriminatory practices.
- **No discrimination** – In ACCIONA any type of discrimination in the work environment based on 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 condition is unacceptable.
- **Promotion of diversity in society and communities** – ACCIONA promotes diversity in its teams where both male and female employees will enjoy an inclusive environment, and recognises and supports the multicultural reality in society and communities, as well as in all its activities and geographical areas where it is present.
- **Recognition based on effective equality** – ACCIONA promotes the use of objective criteria for the recognition of personal skills and professional merit that ensure equity. It therefore recognises and brings to the fore:
 - Gender diversity through promotion and leadership of women, especially in management positions and other positions in which they are under-represented.
 - The diversity of people with disabilities, promoting their inclusion beyond legal requirements.

¹ Human Rights Policy and Human Resources and Occupational Risk Prevention Policy.

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- The creation of equal work opportunities for people in situations of vulnerability.
 - Generational diversity that provides different perspectives that are key for the company.
 - The diversity provided by people of different origins, race, ethnicity, colour, national origin, sexual orientation, gender identity, marital status, family responsibilities, sensitive medical conditions, social origin, religion, political opinion, education, background, employment options or any other condition that is a source of talent and wealth.
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- **Pay equity and equal consideration** – ACCIONA undertakes to ensure that processes related to selection, performance, remuneration and benefits, training, promotion and other professional development practices are based on objective criteria related to merit, the recognition of one's own aptitudes and being suited to the achievement of objectives, far removed from discriminatory practices, and that also ensure equal opportunities and pay equity.
 - **Inclusive leadership** – ACCIONA promotes leadership models that foster an organisational culture inspired by the principles of diversity, equity and inclusion and that emphasise the company's contribution to diversity to meet the challenges from an innovative perspective.
 - **Internal mobility** – ACCIONA facilitates the internal mobility of its employees within the organisation and between all the regions in which it operates, and favours the creation of a network of contacts between the teams, so that they can make use of the advantages provided by the diversity of experiences, skills and viewpoints of people in the company.
 - **Work-life integration** – ACCIONA implements measures that enable the work-life balance of its employees, offering flexible mechanisms (maternity and paternity leave, career breaks, back to work programmes, work hours, remote work, dependent care, etc.) that promote equal opportunities, well-being and commitment in accordance with the best practices of the places where it operates in its sectors of activity.
 - **Inclusive workspaces** – ACCIONA facilitates adaptations in workspaces to guarantee the accessibility of people who require special needs and promotes the elimination of attitudinal barriers in order to ensure participation in truly equal conditions.
 - **Inclusive communication** – ACCIONA ensures that communications and publications made both internally and externally include images and languages that reflect the diverse reality of the people that make up the company. It promotes the use of inclusive language in all types of corporate communications, both internal and external, and in any case does not use discriminatory language.
 - **Skills awareness and development** – ACCIONA promotes actions that raise awareness among its employees and stakeholders on possible unconscious prejudices that may hinder skills to become more inclusive, and it also provides specific training on diversity, equity and inclusion, so that these groups help create a culture and environment free of discrimination. The company promotes initiatives in collaboration with the local community designed to break stereotypes and promote equity, particularly through programmes to empower women in professions in which they are under-represented in the company's activities, support women in the STEM area and arouse interest in STEM vocations among girls.
 - **Contribution to creating more inclusive environments** – ACCIONA develops sustainable and regenerative infrastructures that foster inclusive environments in the communities in which it operates, without any physical or attitudinal barriers, that promote access to people's rights and that help facilitate their participation in equal conditions.
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- **Spread of principles of diversity, equity and inclusion** – ACCIONA undertakes to promote the values and principles contained in this policy among its stakeholders, and promote the participation and involvement of its employees in the principles of this policy, putting them into practice with behaviours that value the unique contribution of each person.

SUPERVISION AND POLICY CONTROL MECHANISMS

- **Identification and assessment of risks of real or potential impacts and integration of results in internal processes**– ACCIONA identifies and periodically assesses real or potential risks in relation to the principles of diversity, equity and inclusion, and establishes an internal control system to prevent and mitigate them, especially those related to its business activity and all its commercial relations. If real or potential adverse effects to these principles materialise, the company undertakes to take the necessary measures to stop and mitigate any residual impact to the greatest possible extent. The company maintains regular and fluid dialogue with its stakeholders in order to identify real or potential risks and predict future impacts.
- **Mechanisms for reporting and claims** – ACCIONA provides its stakeholders with specific channels for reporting and making claims in order to record, identify and respond to violations of human rights and discriminatory practices. These channels are reliable and confidential, offer adequate protection from possible retaliatory measures, are culturally appropriate, are accessible in physical and linguistic terms, and are transparent.
- **Remediation** – ACCIONA undertakes to establish legitimate and effective mechanisms for remediating the adverse impacts that it could cause or could contribute to causing. The company recognises its influence with respect to encouraging commercial partners to provide effective reparation measures.
- **Supervision and collaboration with the authorities** – ACCIONA controls and rectifies any abuse committed to the detriment of the principles of diversity, equity and inclusion. If necessary, it forwards the matter to the appropriate authority, with which it collaborates to the necessary extent.
- **Transparency and accountability** – ACCIONA undertakes to provide adequate and truthful information on the principles outlined in this policy.
- **Monitoring and continuous improvement** – ACCIONA undertakes to periodically review its internal processes, define representative objectives on diversity, equity and inclusion, and establish accountability and progress monitoring mechanisms. The company has the necessary tools and resources to carry out the monitoring, as well as an organisational structure responsible for achieving these objectives, which is responsible for implementing, reviewing and supervising compliance with this policy.