

# 2021

S U S T A I N A B I L I T Y   R E P O R T



#### **ACCIONA ENERGÍA: SUSTAINABILITY REPORT 2021**

The attached Non-Financial Information Statement, prepared in compliance with Law 11/2018, of 28 December, which incorporated into Spanish law Directive 2014/95/UE of the European Parliament, is an inseparable part of the ACCIONA Energías Renovables Corporation's Consolidated Director's Report for 2021.

#### **OTHER ACCIONA ENERGÍA'S PUBLIC REPORTS**

- > **Integrated Report**  
Relationship between the corporate strategy and the performance in different activities and contexts in which the company operates.
- > **Report on the taxonomy of low carbon activities**  
Percentages of alignment of the activity with the European Union taxonomy.
- > **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 also discloses its own Sustainability Report and other reports mentioned here.*

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# LETTER FROM THE CHAIRMAN

José Manuel Entrecanales

**Chairman of ACCIONA Energía**

This first *Sustainability Report* of ACCIONA Energía contains the balance of an unprecedented year. Since the company began construction on its first wind farm in Spain at the beginning of the 90's, the concentration of carbon dioxide in the atmosphere has grown 50% higher than before the Industrial Revolution. The consequences are visible and dramatic, with extreme climatic events in different parts of the world, desertification and loss of biodiversity.

However, 2021 also closed with encouraging data: several countries representing 90% of the global wealth creation in terms of Gross Domestic Product are committed to achieving climate neutrality by 2050. However, this glimmer of hope will also be a huge challenge.

ACCIONA Energía is the largest 100% renewable energy company with no fossil fuel legacy in the world<sup>1</sup>; we offer solutions to the challenges that humanity faces, with projects and technologies that contribute to the decarbonisation of the economy, regenerating the habitats of the planet and creating more and better future opportunities.

This *Sustainability Report 2021* contains the main actions that we implemented to develop this corporate commitment, which is also a personal one, to build a better planet.

## THE YEAR ZERO OF A NEW STAGE

Of the events that occurred in 2021 I would like to highlight two milestones which, despite their different nature, illustrate the priorities of our company.

## Strengthening our capacity to contribute solutions for the decarbonisation of the economy

The company's initial public offering in July meant a big internal effort over five months to prepare and carry out the largest initial public offering of a renewable energy company since 2016, with the success of all shares being bought in less than 24 hours.

The implementation process added value to the solid track record of the company and its only profile in a very limited universe of listed companies with our characteristics.

Becoming a listed company enables us to take advantage of an exceptional window of opportunity linked to the construction of a low carbon economy, thanks to a business model



based only on renewable energies, with no fossil fuel legacy, vertically integrated and strongly diversified in technologies, geographies and solutions, having accumulated a solid track record and a know-how of more than 30 years.

The strength and ESG credentials of ACCIONA Energía facilitates access to competitive financing which will enable us to accelerate growth and reach our target of doubling our size to achieve 20 GW of installed power by 2025. Furthermore, it will increase our capacity to make the necessary investments to contribute to the maturity of emerging technologies such as green hydrogen, floating offshore wind energy, hybridisation and storage solutions.

The effort put into the initial public offering meant a big step towards our aim of becoming an integral ally for the decarbonisation of the economy, with a global portfolio of competitive technological solutions. Companies acknowledge us as such: in 2021 we were one of the 10 electricity companies worldwide that signed the largest number of long-term renewable energy purchase agreements.

A benchmark for sustainable investment

The bylaws of ACCIONA Energía, approved in 2021, owing to the company's incorporation as an independent enterprise, contain the present and future alignment of its activities with sustainable development models and underline the company's commitment to all stakeholders, placing them all on the same level.

To ensure compliance with this corporate object, the sustainability policies which govern the company must be strictly, precisely implemented with a degree of supervision similar to that of economic-financial indicators.

For this purpose, ACCIONA Energía has integrated the finance and sustainability teams, both in their management bodies under the leadership of the Chief Financial and Sustainability Officer, and in the governing bodies, with the creation of the Audit and Sustainability Committee, which will allow us to be more efficient in the implementation of our sustainable growth strategy.

DEPLOYMENT OF OUR  
SUSTAINABILITY MASTER PLAN

This *Sustainability Report 2021* describes in detail the results of the first year as a listed company and the degree of implementation of the commitments defined in the 2025 Sustainability Master Plan.

In 2021 the People programme was consolidated as a proposal of value to employees, significantly contributing to one of the SMP pillars: putting **People at the Centre**. Also, we approved our Human Rights Policy, defined the due diligence strategy, and implemented the Internal Control System for Social Safeguards.

Regarding the **Planet Positive** dimension, we avoided the emission into the atmosphere of 13.4 million tonnes of CO<sub>2</sub>, by generating 24.5 TWh of renewable energy. We also reduced our Scope 1 and 2 emissions by 44% compared to the previous year, in line with the commitments adopted by ACCIONA Energía with the Science Based Target initiative (SBTi).

Scope 3 emissions increased by 37% following higher purchasing intensity to deploy our growth plan and will be, no doubt, a focal point of action and improvement in the coming years.

34% of the water that we consumed came from a recycled source, thus reducing by 35% water consumption in water-stressed countries.

Regarding waste, 97% of non-hazardous waste was recovered and we reduced by 49% the generation and despatch of such waste to landfill compared to the previous year.

Our commitment with the regeneration of habitats in the surroundings of our facilities, was materialised by planting 127,594 trees in Spain, for the reforestation of burnt Public Utility Mountains, in Mexico, reforesting abandoned areas surrounding the wind farms of Oaxaca, and in India. More than half of these trees, 74,947, are not linked to compensatory measures in our facilities.

As for innovation, under the pillar of **Exponential Leadership** of the SMP 2025 and as part of our permanent commitment to innovation, we assigned more than 90 million euros to 60 innovation projects focused, among other things, on extending the useful life of our assets, storing and producing renewable hydrogen.

Finally, under the pillar of **Integrate to Transform**, we developed social impact management projects in 36 facilities in 10 countries, implementing a total of 168 social initiatives.

KEEP BUILDING  
FUTURE OPPORTUNITIES

We were pioneers in the mid-90's in the development of renewable technologies, when its disruptive and revolutionary potential to solve the challenges posed to humanity was still unknown.

Our quest is now to carry on leading the fight against the climate emergency, focusing not only on our core technologies, but also being pioneers in a new generation of technologies and solutions that mean a qualitative leap in decarbonisation, such as energy-efficient services, infrastructure to charge electric vehicles and supply of green hydrogen, that will be important vectors for the decarbonisation of the economy.

As a company, we had that vision more than thirty years ago and we find ourselves today at the right time and in the right position to have a leading role in the sustainable transformation of the economy.

Thanks to this *Sustainability Report*, I have the opportunity to show my appreciation for the professionals, shareholders and clients of ACCIONA Energía who have been with us and have guided us to this moment, and I ask you to endorse this target with your effort and trust.

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ONLY IN RENEWABLES



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# MORE THAN 30 YEARS BOOSTING THE DECARBONISATION OF THE ECONOMY

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies.

## RENEWABLE ENERGY FOR A SUSTAINABLE PLANET

ACCIONA Energía is present in 16 countries on five continents and is exclusively dedicated to renewable technologies, with which it produces clean energy. It has a unique company profile, integrated in all the phases of the value chain: development, financing, engineering and construction, procurement, operation, maintenance and the marketing of energy. All of this, combined with an ongoing commitment to innovation, places the company in a unique position to lead the transition process to a decarbonised and electrified economy, supported by renewable energy sources.

The company owns renewable electricity generation assets which amount to 11,245 MW, of which 78% are from wind power, 13% photovoltaic, 8% hydroelectric and the rest corresponds to facilities in biomass and solar thermal energy plants. Its renewable capacity allows it to produce more than 24.5 TWh per year and supply an equivalent to the consumption of more than 7.5 million homes. Half of the capacity is in Spain and the rest internationally, distributed among fifteen countries: Australia, United States, Canada, Mexico, Costa Rica, Chile, Portugal, Italy, Hungary, Poland, Croatia, Ukraine, India, South Africa and Egypt.

	2020	2021
Turnover (million €)	1,769	2,472
EBITDA (million €)	868	1,086
Installed capacity (MW)	10,694	11,245
Total production (GWh)	24,075	24,541
Workforce	1,543	1,762

2021 was marked by the initial public offering of 17.25% of the company's shares, previously owned by ACCIONA S.A., which still retains the remaining shares. With this operation the intention is to reduce financial expenses and increase the company's balance sheet capacity to accelerate growth.

### Value chain

Project development	Engineering and construction	Supply chain	Operation and maintenance and management of assets	Energy management
<ul style="list-style-type: none"><li>&gt; Local hubs with global reach with a team of &gt;100 people.</li><li>&gt; Structuring capabilities: tailor-made projects to optimise the cost of energy.</li></ul>	<ul style="list-style-type: none"><li>&gt; In-house capabilities and high quality assets.</li><li>&gt; Extensive experience in resource assessment: pioneers in methodology and tools.</li><li>&gt; Team highly renowned for its technical know-how acquired for more than 30 years.</li></ul>	<ul style="list-style-type: none"><li>&gt; Large scale purchasing power.</li><li>&gt; Strong relationship with manufacturers.</li><li>&gt; Preferred client of Nordex.</li><li>&gt; More than 1,600 master supply agreements.</li></ul>	<ul style="list-style-type: none"><li>&gt; Higher availability than market standards.</li><li>&gt; +15GW managed through CECOER.</li><li>&gt; Predictive maintenance for "infinite" useful life.</li><li>&gt; Advanced digital strategy.</li></ul>	<ul style="list-style-type: none"><li>&gt; Energy management tailored to client's needs.</li><li>&gt; Preferred partner of large multinationals.</li><li>&gt; Global player in corporate PPAs.</li><li>&gt; Committed to marketing expansion.</li></ul>

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TECHNOLOGIES AND SERVICES

- › Wind-power: ACCIONA Energía ranks #7 in the world in terms of company-owned installed onshore wind capacity, excluding China’s operators, according to IHS. It manages 8,787 MW. Thanks to its agreement with SSE Renewables, the company will also develop offshore wind energy projects.
- › Solar photovoltaic: the company is a leading international player, with company-owned 1,441 MW. ACCIONA Energía was a pioneer in photovoltaic energy when in 2001 it built what was then the largest solar photovoltaic plant in Spain: 1.2 MWp.
- › Hydroelectric: solid experience with 100 years old operating assets. It currently operates 873 MW, including an 89 MW reversible plant.
- › Thermal renewables: 61 MW in three pioneering biomass plants in Spain and 64 MW in a solar thermal plant in the United States.
- › Energy storage: pioneers in Spain in storage integration in wind power and photovoltaic plants. The company received the world’s first certification of a grid-connected storage facility from DNV GL.
- › Energy sale: ACCIONA Energía is one of the operators with the largest number of signed PPAs worldwide. In 2021 the company was again designated as the largest independent 100% renewable electricity trader in Spain, according to data made public by the Spanish National Markets and Competition Commission (CNMC). The company uses blockchain to guarantee the 100% renewable origin of its energy sold.
- › Green hydrogen: partner in the 1st hydrogen *hub* in southern Europe of 2.5 MW. Joint Venture with Plug Power to develop and operate Iberian green hydrogen projects. Funds awarded for the first large-scale green hydrogen plant in Chile.
- › Energy services: the company designs and invests in solutions that optimise and reduce the energy consumption of public and private customers. It recently received the largest energy service contract in Spain, in Gijón, and has entered the French market at the beginning of 2022 after acquiring Equinov, an energy efficiency company.
- › Intelligent charging of electric vehicles: after acquiring Cargacoches in 2021, the company owns about 50 of its own interurban fast charging points, and manages over 400 third-party points and 10,000 registered users. In this way, the company is also expanding its solutions portfolio to serve companies and institutions that plan to integrate electric mobility fleets into their decarbonisation plans.

- › New energy solutions: in 2021 ACCIONA Energía obtained European funding for agricultural irrigation with an innovative photovoltaic solution, it installed jointly with Schneider Electric the first industrial microgrid in Spain, and is making progress in the development of new technological solutions of floating offshore wind power, a sector with great potential for growth.
- › Operation and maintenance: the company renders these services through its Renewable Energy Control Centre (CECOER), for its own and for third-party plants. Each year more than half a million incidents are managed, of which 60% are rectified remotely.

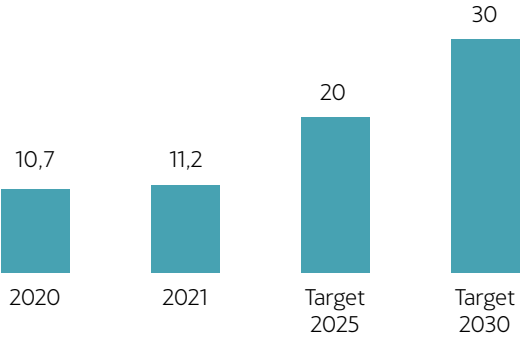
**i** For further information on the business model of ACCIONA Energía visit <https://www.accion-energyia.com/activity-areas/>

DOUBLE GROWTH

We are witnessing an emergency. The global targets for 2030 are going to be difficult to reach and, after the crisis we are now experiencing, are even more so. We must speed up progress now, and to do so the company intends to multiply its investment in projects all over the world within the next 5 years.

Raising funds from the Initial Public Offering allowed it to start investing in renewable facilities that will enable it to reach 20 GW of installed capacity by 2025, doubling its current generation capacity.

Installed capacity targets (GW)





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The planned growth is distributed almost equally between wind and photovoltaic energy and will consolidate the company’s presence in its five main markets: Spain, United States, Australia, Chile and Mexico. Nevertheless, the company is working to develop assets in countries with long-term growth potential within its operational *hubs*. The company is also advancing in other technologies such as green hydrogen and offshore wind energy.

As solid foundations are needed to ensure this ambitious growth, the company has defined the following levers that will enable it to maximise profitability:

- › Industry-leading asset management that assures and maximises future cash flows, with the goal of extending the useful life of assets through the development of life extension programmes and best practices in digitalisation.
- › Sophisticated energy management, seeking maximum profitability through sale mechanisms diversification: public PPAs, corporate PPAs, *feed-in-tariffs*, market strategies and financial hedging, among others.
- › Expansion of business capabilities, by strengthening the Business-to-Business customer portfolio.

REGENERATIVE BOOST

Apart from increasing its investment, ACCIONA Energía wants this effort to enhance its capacity to create sustainable positive impacts by doing things differently. We have called this different way of doing things “regenerative”.

- › We place people at the centre of our decisions, our designs and our activity. A people management model that includes the people in the organisation, the communities where we carry out the projects and the users and beneficiaries of the infrastructures that we develop.
- › Go beyond the traditional - do no harm, net zero - of responsible companies, to address a positive approach, to rebuilding what was lost.
- › Demonstrate consistent, authentic, real and constant leadership to be a real example for others, as well as a decisive drive of open and exponential innovation to be in the front line of technology and ideas.
- › Design taking into account the complexity, inter-connectivity of problems and, therefore, solutions.

Sustainable orientation of the corporate social purpose



Sustainable approach in the bylaws.

The company’s Articles of Association, approved in 2021, highlight the commitment of ACCIONA Energía to all stakeholders, positioning them at the same level: “The activities that comprise the corporate social purpose will be performed for the purpose of promoting more sustainable models of society. In the search for long-term value creation, ACCIONA Energía will safeguard the legitimate interests of shareholders, employees, suppliers, clients and other stakeholders, with the positive social and environmental impact of its activities benefiting the community and the planet”.

Financial and non-financial governance integration

In order to fulfil its corporate purpose, it is necessary that the indicators on the sustainability policies that govern the company must be monitored and performed with the same discipline and thoroughness as its economic-financial indicators. The management of the sustainability policies has been integrated in 2021 into the new Economic-Financial and Sustainability Management which depends on the new Audit and Sustainability Committee of the Board of Directors.

The operationalisation of the sustainable orientation of the corporate purpose will move forward in 2022 in the following steps:

- › Wording the company’s purpose.
- › Introduction of a new leadership and remuneration model.
- › Update of the Code of Conduct.
- › Development of new “ACCIONA Well” workspaces.

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PIONEERS IN SUSTAINABLE FINANCING PRODUCTS

ACCIONA Energía uses two sustainable financing mechanisms: one aimed at projects and the other at sustainable corporate financing, for which it has developed an innovative methodology to promote the generation of combined impact, on the one hand, at the local level and, on the other, at the corporate level.

The company carries out an analysis to classify its activities according to the criteria established by the European Union’s taxonomy of low-carbon activities.

RENEWABLE MARKET TRENDS

GLOBAL RENEWABLE ENERGY MARKET OVERVIEW

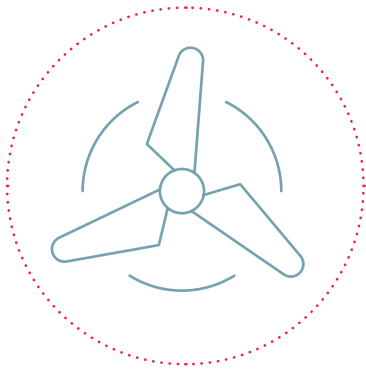
The installed capacity of renewable energy has more than tripled since 2000, reaching record highs of 2.8 TW. While wind power is the second largest renewable energy source following hydro, solar PV represents the largest increase in total capacity since the beginning of the decade. The Sustainable Development Scenario issued by the International Energy Agency, forecasts global installed generation capacity to grow from 7.5 TW, in 2019, to 16.6 TW in 2040, with renewable energy accounting for 100% of the increase.

INCREASING COMPETITIVENESS OF RENEWABLE ENERGY AGAINST CONVENTIONAL GENERATION SOURCES

Solar PV and onshore wind energy are now the most competitive sources of new-build generation in countries that cover two-thirds of the global population, comprising 90% of the world’s energy generation.

UNPRECEDENTED DRIVE BY PUBLIC SECTOR ENTITIES TOWARDS DECARBONISATION

Net-zero emission targets have been proposed by economies covering 90% of the world’s GDP, including those that highly contribute to global carbon emissions such as China, USA, the European Union, Korea, and Japan.



ACCIONA Energía carries out an analysis to classify its activities according to the criteria established by the EU taxonomy of low-carbon activities

FAST-GROWING ELECTRICITY CONSUMPTION

In advanced economies, the electrification of heat generation, through highly efficient heat pumps, and transportation sectors, such as the use of electric vehicles, will play an increasingly relevant role, together with the rise of new applications for electricity, like the production of green hydrogen.

GROWING CORPORATE DEMAND FOR SUSTAINABILITY

Long-term energy sale agreements (PPAs) have played an increasingly relevant role in the renewables landscape, supported by corporations and institutions searching for ways to enhance their environmental sustainability and expand their access to clean energy.

NEW FLEXIBILITY AND RENEWABLES INTEGRATION TECHNOLOGIES

Storage technologies have emerged as one of the key enablers of flexibility, as they allow storing surplus of energy, minimising curtailment, and injecting that same energy into the grid when wind and solar resources are not favourable for electricity production.

EXPANSION OF GREEN HYDROGEN

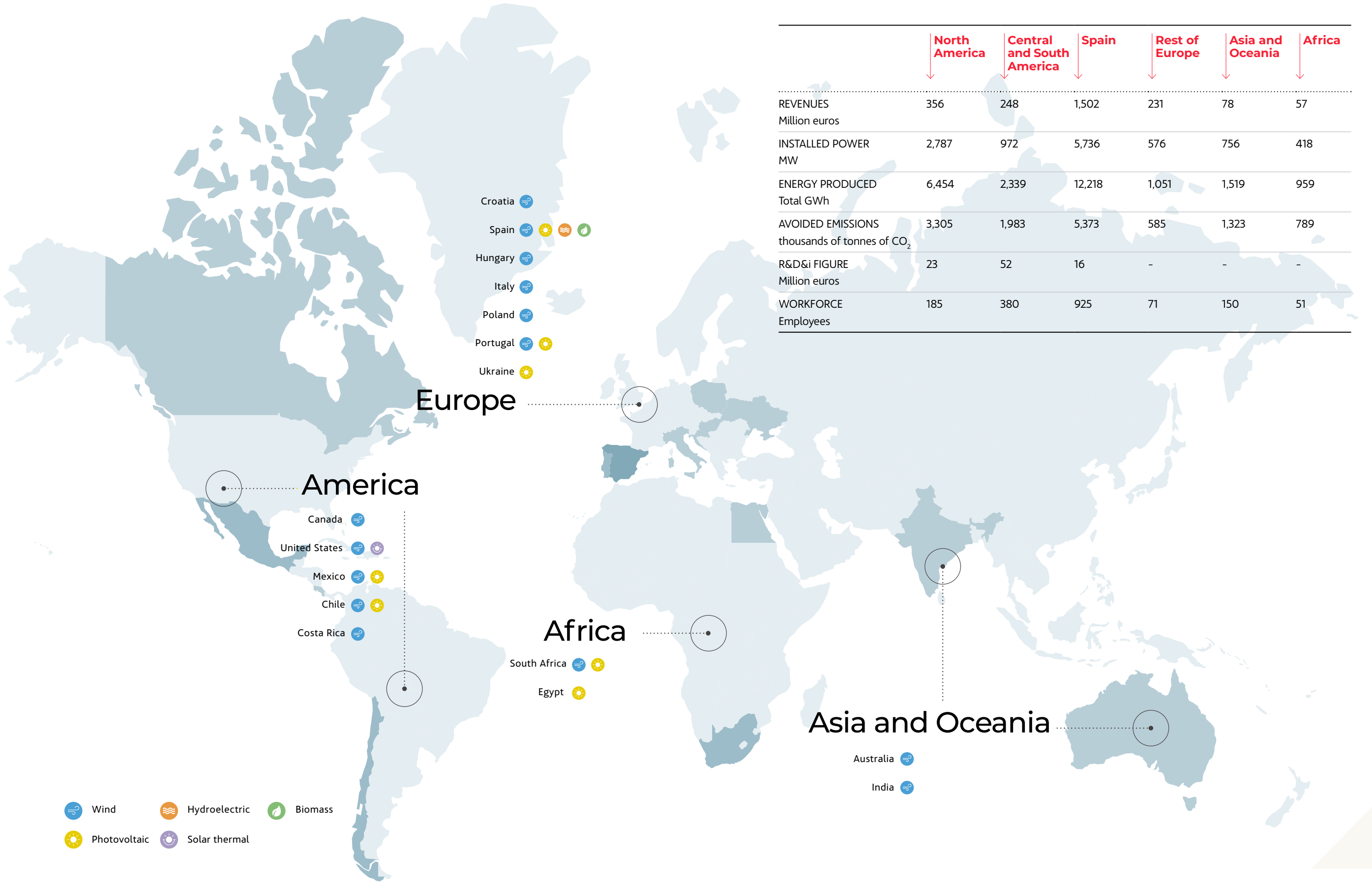
Green H<sub>2</sub> is expected to expand the reach of clean energy solutions to industrial and mobility sectors with emissions difficult to eliminate, such as steel making, chemicals manufacturing and heavy-duty transport.

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# ACCIONA Energía in the world

Present in 16 countries on five continents with five technologies.

	North America	Central and South America	Spain	Rest of Europe	Asia and Oceania	Africa
REVENUES Million euros	356	248	1,502	231	78	57
INSTALLED POWER MW	2,787	972	5,736	576	756	418
ENERGY PRODUCED Total GWh	6,454	2,339	12,218	1,051	1,519	959
AVOIDED EMISSIONS thousands of tonnes of CO <sub>2</sub>	3,305	1,983	5,373	585	1,323	789
R&D&i FIGURE Million euros	23	52	16	-	-	-
WORKFORCE Employees	185	380	925	71	150	51



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# DEGREE OF FULFILMENT OF COMMITMENTS

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# SUSTAINABILITY MANAGEMENT

ACCIONA Energía has created a model for monitoring and managing its sustainability commitments, with the main objectives being transparency and exponential improvement.

## INTEGRATED SUSTAINABILITY GOVERNANCE

ACCIONA Energía created in 2021 the Audit and Sustainability Committee that serves as an instrument and provides support to the Board of Directors in the supervision of accounting, financial and non-financial information, the best practices in sustainability, the internal and external audit services and risk management. The Committee meets, depending on its needs, at least every three months.



### Functions of the Audit and Sustainability Committee in terms of ESG<sup>2</sup>

- ▶ Regularly review the efficiency 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, and raise its reports to the Board of Directors.
- ▶ Identify and guide the sustainability policies, rules, commitments, objectives, strategy and best practices. Ensure that Company practices 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 rules 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.

2. Full explanation of the functions, powers and members of the Audit and Sustainability Committee available at: <https://www.accionenergy.com/es/accionistas-inversores/gobierno-corporativo/consejo-administracion-comisiones/>

ESG matters discussed at the meetings held in 2021 were:

- ▶ Approval of the Policy Book, which includes policies on sustainability, relationship with stakeholders, anti-corruption, social action, human rights, human resources and occupational risks, environment, climate change, water, biodiversity, circular economy and data protection, among others.
- ▶ Approval of the Sustainability Master Plan 2025 and emission reduction targets based on science.
- ▶ Follow-up of sustainability performance.
- ▶ 2022 work programme.

The members of the Committee had a training session on sustainability at one of their meetings.

In 2022 this Statement of Non-Financial Information, also called Sustainability Report, will be submitted to the General Meeting of Shareholders for review and approval, as required by Law 11/2018. The shareholders will have the opportunity to comment on the initiatives and annual performance described in this Report.

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

In addition, it relies on sustainability speakers in strategic markets. This enables the company to have direct knowledge of the social and environmental context in different international markets, as well as greater coordination in the implementation of initiatives.

ACCIONA Energía created in 2021 the Audit and Sustainability Committee that serves as an instrument and provides support to the Board of Directors

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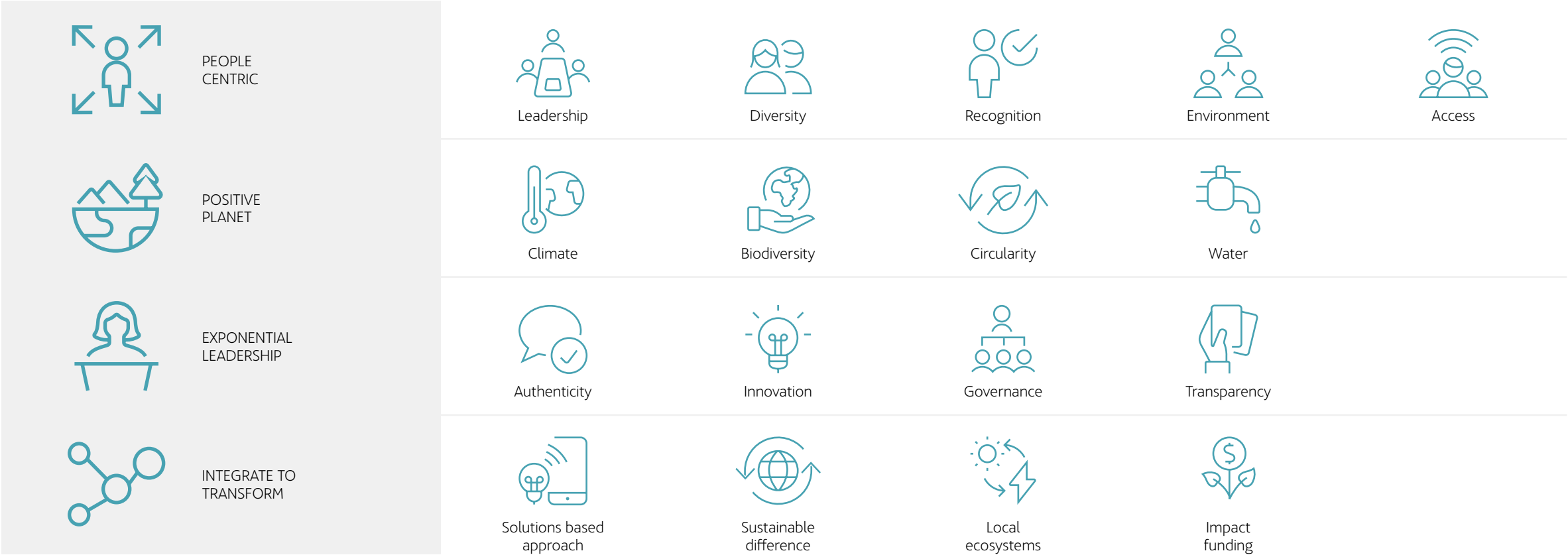
SMP 2020-2025: WE MUST SPEED UP AND WE HAVE A PLAN

ACCIONA Energía’s sustainability strategy is 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 directors, managers and some technical and support staff. In this annual evaluation, the achievement of sustainability targets such as the reduction of greenhouse gas emissions, the reduction of the frequency rate of occupational accidents or objectives linked to gender equality are considered.

The purpose of the SMP 2025 is to encourage ACCIONA Energía to reimagine energy infrastructures. The company invests in, develops and operates infrastructure assets that can make our planet sustainable. In short, making the enterprise a recognised leader in developing basic infrastructure assets with an added value, with people and the planet in mind; in a word, regenerative.

Each of the four SMP 2025 pillars has several areas of action and a marked pathway that includes responsible to resilient activities, and those that contribute a regenerative impact. These are the pillars:






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BALANCE OF ADVANCES IN THE SMP 2025



The strategic lines take the form of levers for transformation and indicators of improvement proposed by the areas with direct responsibility for them. The objectives will be reviewed to raise the level of ambition if necessary.

In 2021, the first year of the SMP 2025, about 30% of the levers were totally activated, 55% of them were partially activated and the remaining 15% is expected to be activated in 2022.

Main levers to be activated

SMP pillar	Main levers	Activation	Advances
 <b>PEOPLE CENTRIC</b> <i>quality of life, inclusive future</i> <b>Our advantage comes from people</b>	New leadership model based on competencies, commitment, accountability and people growth	↑	We have been working on the new leadership model that will be presented in 2022.
	Gender-based recruitment programmes	↑	Extend sustainable 50:50 projects. Improving the percentage of women in management positions.
	Focus on critical technical and high-performance positions	↑	Several development programmes for high-performance staff.
	Promote a consistent programme of mobility between business areas and countries	↑	18% of positions covered by internal mobility.
	Develop a flexible work model that promotes work-life balance	↑	Implemented a pilot Home Office programme.
	Develop an integrated social safeguard risk assessment and compliance management system	↑	The system for Internal Control of Social Safeguards was launched in 2021.



Main levers to be activated

SMP pillar	Main levers	Activation	Advances
 <b>PLANET POSITIVE</b> <i>From net zero to positive contribution</i> <b>Invest to regenerate the planet</b>	Translate climate ambition and neutrality into projects	↑	4 project-level initiatives funded by the decarbonisation fund.
	Develop a Scope 3 decarbonisation strategy	↑	Progress has been made thanks to the analysis of the life cycle in the design of projects.
	Incorporate Science Based Targets for Nature	—	Advances estimated in 2022 in parallel to the advances of the Taskforce on Nature-related Financial Disclosures (TNFD).
	Develop circular alternatives	↑	Launch of projects of recycling composites and biomass combustion slags.
	Identify and prioritise operations in areas of water stress by developing an ultra-efficient water-positive plan	↑	Water consumption in water-stressed countries decreased about 35% compared to 2020.
SMP pillar	Main levers	Activation	Advances
 <b>EXPONENTIAL LEADERSHIP</b> <i>Authenticity, transparency</i> <b>We pursue a purpos</b>	Redefine the company's purpose, promise and principles	↑	The new definition of purpose, promise and principles will be presented in 2022.
	Promote regenerative innovation initiatives	—	Regenerative component still to be included in innovation.
	Analysis of the company's adaptation to become a B-Corporation	↑	The AGM approved the change of the bylaws to include the present and future alignment of the enterprise's activities with sustainable development models.

↑ Totally activated lever      ↑ Partially activated lever      — Lever to be activated

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Main levers to be activated

SMP pillar	Main levers	Activation	Advances
 <b>EXPONENTIAL LEADERSHIP</b> <i>Authenticity, transparency</i> <b>We pursue a purpos</b>	Extend the functions of the Board's Sustainability Committee	⬆️	The Audit and Sustainability Committee has been created.
	Review practices of due diligence when executing "No-Go" policies for suppliers	⬆️	Reinforcement of "No-Go" policies for suppliers to adapt them to the social safeguard controls in place and ending in 2022.
 <b>INTEGRATE TO TRANSFORM</b> <i>Connect to affect</i> <b>Difference in every project</b>	Incorporate the analysis and coordination of differential sustainable capacities into the project design and management process	⬆️	The evaluation tool of sustainable capabilities in the value chain was developed.
	Identify and develop a catalogue of sustainable differences	⬆️	A "regenerative playbook" is being developed to activate sustainable difference, to be completed in 2022.
	Develop a network of local partnerships in the main countries	⬆️	To be activated within the first six months of 2022.
	Promote innovative funding mechanisms that encourage the development of positive or regenerative high impact projects	⬆️	Frameworks have been designed and funding linked to ESG two-fold impact has been obtained: corporate and local.

The SMP 2025 quantitative targets consist of the annual improvement of each of the indicators in the following table. In 2021, the indicators improved by 50%. The target of ACCIONA Energía for 2022 is to improve the data of the previous year.

Evolution of the SMP 2025 key indicators

	2019	2020	2021	Var. 2020-2021
<b>SOCIAL</b>				
Women in management and executive positions (%)	20.0	20.5	23.2	+ 2.7 pb
Workforce with disabilities in Spain (%)	NA	4.1	3.2	- 22%
Accidents: global frequency rate (employees and subcontractors)	0.74	0.53	0.61	+ 15%
<b>ENVIRONMENTAL</b>				
CAPEX aligned with the European taxonomy of low-carbon activities (%)*	100	100	100	-
Scope 1+2 GHG emissions (tCO <sub>2</sub> e)	30,477	25,633	14,303	-44%
Percentage of non-hazardous waste to landfill (%)	11	7	3	- 4 pb
Total water consumption (hm <sup>3</sup> )	1.5	1.4	1.4	0

\* Data from 2019 and 2020 are not comparable with that of 2021 as they have not been calculated using the same criteria as the regulatory documentation in force at the closing date of this Report.

The following chapters describe in detail the strategies adopted and their results for the indicators, as well as other factors that influenced the variation of the KPIs.

RELATIONS WITH STAKEHOLDERS (GRI 2-29)

Communication and constant dialogue are the cornerstones of ACCIONA Energía’s relationship with its stakeholders, namely the individuals and organisations that are directly or indirectly affected by the activity of the company. In short: employees, customers, local communities, suppliers and subcontractors, public administrations and regulatory bodies, investors and analysts.

The Stakeholder Relations Policy identifies the main stakeholders and outlines the company’s principles for learning about their needs and expectations. It therefore facilitates the generation of shared value and the establishment of long-term relationships.

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Interactions with stakeholders

Stakeholders	Means of communication	Matters discussed	Information on the management of the matters discussed
Employees	E-mails, newsletters, intranet, commitment survey	Prevention, safety, health and talent management measures	Chapter “Transformative environments” in “People Centric”
Customers	Apps, CRMs, call centers, open doors events, personal agents	Quality and safety of products and services	Chapter “Customers” in “Exponential Leadership”
Local communities	Web forms, e-mails, phone numbers, suggestion boxes and assistance offices	Local impact of projects	Chapter “Local ecosystems” in “Exponential leadership”
Suppliers and subcontractors	Supplier Satisfaction Survey, procurement email directions	Integrity, occupational risk prevention, Human Rights	Chapter “Supply chain” in “Exponential leadership”
Public Administrations and regulatory bodies	Public query processes	Regulatory frameworks for decarbonisation and renewable technologies	Chapter “Authenticity” in “Exponential leadership”
Investors and analysts	Conferences, roadshows, reverse roadshows and earnings reports	Low-carbon activity	Chapter “Climate” in “Planet Positive”

The Stakeholder Relations Policy identifies the main stakeholders and outlines the company’s principles for learning about their needs and expectations

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

This analysis provides information on the importance of matters related to the business strategy and determines the expectations and needs of the stakeholders.

Materiality analyses combine the internal vision of the different businesses and the external vision of the stakeholders, applying the Global Reporting Initiative (GRI) “Principles for defining report content” found in Standard GRI 1: Foundation. The approach is both financial and non-financial, in line with the dual materiality perspective of the European Directive on Non-Financial Information. The evaluation takes into account both the consequences of the company’s activities on non-financial matters, and the way in which these impact on the company itself.

01

**Phases of the analysis:**

**Identification of the issues.**

A selection based on the megatrends identified in the Global Infrastructure Hub’s Infrastructure Futures Report and their crossing with the work areas of the Sustainability Master Plan 2025.

02

**External assessment based on a non-financial approach.**

The impact of a company such as ACCIONA Energía on matters defined through the assessment of different stakeholders’ representatives, according to the region and activity of the company with which it has relations. A total of 27 ratings were analysed.

03

**Internal evaluation with a financial approach.**

The impact of matters on earnings and on the company’s strategy is analysed. This is done by consulting the company’s departments that have a closer contact with stakeholders.

04

**Prioritisation depending on the internal and external assessment.**

Two tools are used, the traditional external-internal materiality matrix and the network of relationship among matters made with the Resilience tool.

05

**Validation of the weights assigned to each stakeholder and department and also of the results by the Financial and Sustainability Management.**

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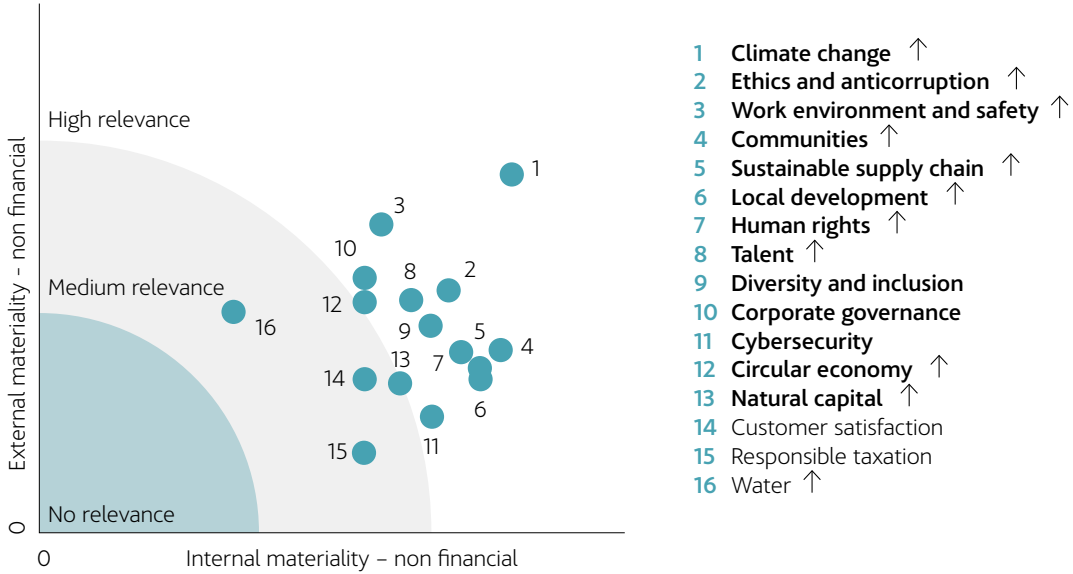
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Sources of information for the materiality analysis

Stakeholders	External assessment. Non-financial materiality: impact of ACCIONA Energía on each area	Internal assessment Financial materiality: impact of each area on the company
Consulted source	Level	Consulted department
Employees	Internal communication engagement data	Company Internal communication and human resources
Investors	S&P's and Sustainalytics' sectoral ESG surveys	Company Investor relations
Customers	Private customers' sustainability reports	Company Business development
Competitors	Competitors' sustainability reports	Company Procurement
Suppliers	Suppliers' sustainability reports	Company Regulation and compliance
Regulatory bodies	Law 11/2018	Company Sustainability, social and environmental
ESG prescribers	GRI, SASB, TCFD, WEF reporting standards	Company Communication
Local community	Local sustainability problems according to the Maplecroft tool	Country
Observatories	Business transparency observatories' reports	Country
Media	Review of news published in the press per relevant localisation	Country

The traditional materiality matrix shows on one axis the internal vision of impact and probability, and on the other the external vision of the importance of each trend. The arrow ↑ that appears for ten matters indicates the matters for which it is concluded that their relevance will grow in the medium and long term.

Traditional materiality matrix



This analysis highlights matters such as “climate change”, “ethics and anticorruption”, “work environment and safety” and “communities”. Twelve topics are in the high relevance area, while five are in the medium relevance area.

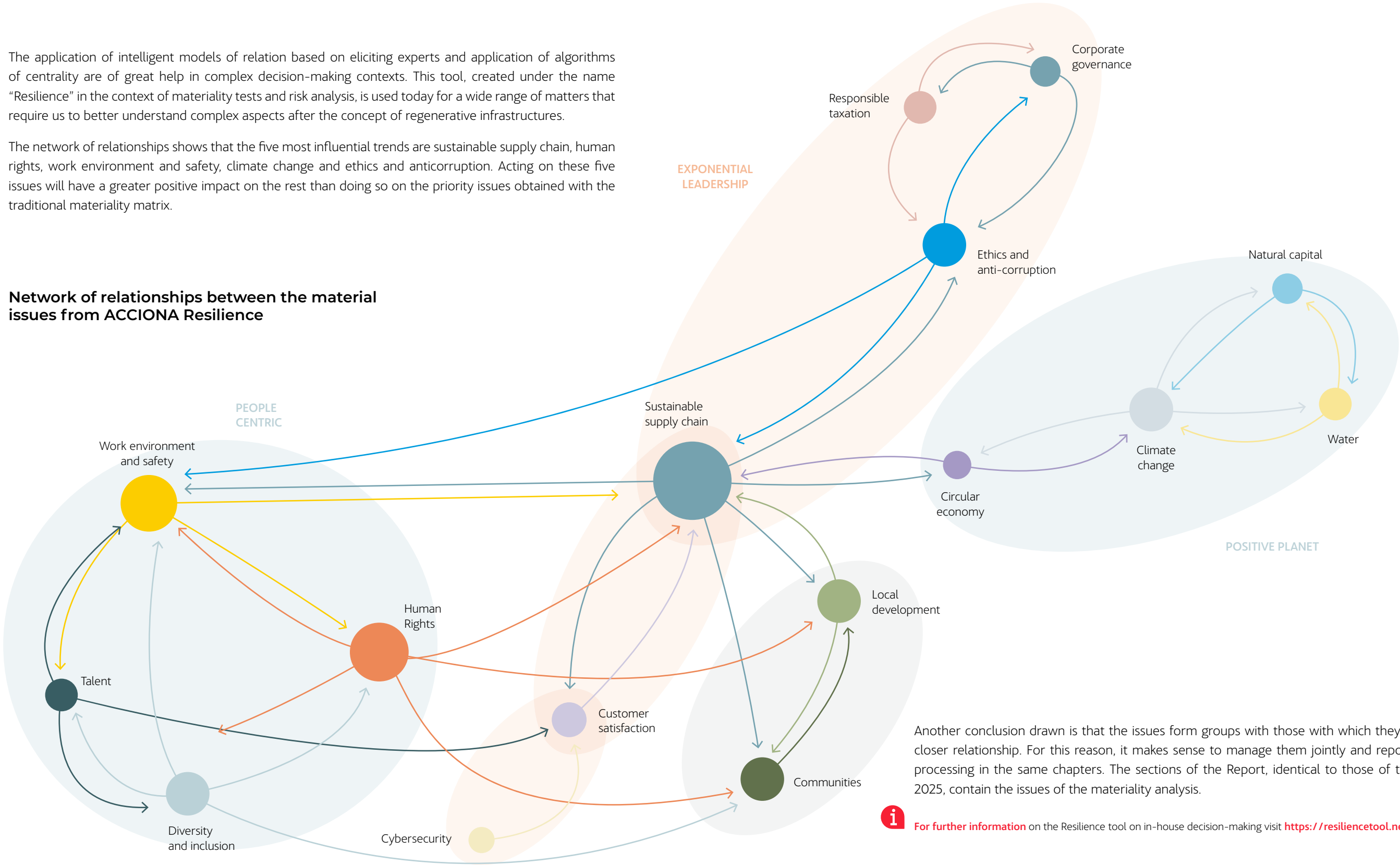
One of the main challenges of managing sustainable aspects lies in the connectivity and relation that the different matters that form the priorities of action have. These relations many times are a determining drive or an obstacle, difficult to represent in the current double entry graphs. For this reason ACCIONA group has developed a tool based on algorithms of networks that enables us to see the materiality analysis developed in a two-dimensional manner.

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The application of intelligent models of relation based on eliciting experts and application of algorithms of centrality are of great help in complex decision-making contexts. This tool, created under the name “Resilience” in the context of materiality tests and risk analysis, is used today for a wide range of matters that require us to better understand complex aspects after the concept of regenerative infrastructures.

The network of relationships shows that the five most influential trends are sustainable supply chain, human rights, work environment and safety, climate change and ethics and anticorruption. Acting on these five issues will have a greater positive impact on the rest than doing so on the priority issues obtained with the traditional materiality matrix.

Network of relationships between the material issues from ACCIONA Resilience



**i** For further information on the Resilience tool on in-house decision-making visit <https://resiliencetool.net/es/>

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MANAGEMENT OF NON-FINANCIAL RISKS

Risk management is a process driven by the Board of Directors consisting of identifying, assessing and managing the potential events that might affect the company and the effects they have. 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.

Each risk event (financial and economic, strategic, operational and unforeseeable) is assessed by ACCIONA Energía’s directors using criteria such as probability, economic-financial impact, impact on image, impact on sustainability and development, the company’s ability to manage it, and finally, risk management decided by the company. The timeframe for this assessment is one year, although other risks that could materialise over a longer time horizon are also identified and managed.

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

**i** For further information on the Risk Management System in the Corporate Governance Report: <https://www.accion-energy.com/shareholders-investors/corporate-governance/>

In 2021, ACCIONA Energía focused its ESG risk management model on the assessment of those activities of the company that presented greater potential impact, owing to the relevance of its economic, environmental and/or social indicators.

Thus, based on the evaluation of 8 key locations, 14 ESG risk types were characterised: 7 environmental, 5 social and 2 related to governance. A total of 77 ESG risk scenarios were assessed.

As concluded from the exercise, the ESG risk perceived are, for all the scenarios, low or very low and relatively homogeneous among the different locations and technologies. All the risk scenarios assessed have been considered low or very low either because of the low probability of their occurrence or because the severity of their impact in the event of their occurrence would be limited by the various safeguards, controls and other mitigation measures that have been adopted by ACCIONA Energía. In any case, the most relevant scenarios are those related to potential damage to habitats or certain species of plants and animals and events related to abuse or discrimination.

**i** More information on climate risk management see the chapter “Planet positive”.

POLICY BOOK

The Policy Book, approved in 2021 by the Audit and Sustainability Committee, contains the commitments and principles of action applicable to all the ACCIONA Energía’s companies in economic, social, environmental and good governance terms.

Sustainability policies:

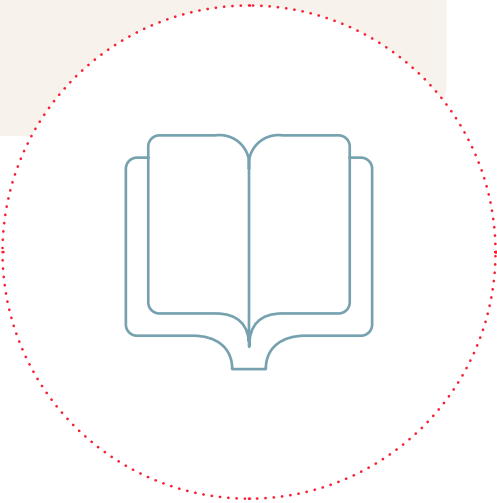
- > Sustainability and Innovation
- > Economic and Good Governance Area
- > Social Sphere
- > Environmental Sphere

Other policies:

General Communication Policy, Board of Directors’ Composition Policy, ACCIONA Energía’s Directors’ Remuneration Policy and Policy on Personal Data Protection and Guarantee of Digital Rights.

**i** For further information on the Policy Book visit <https://www.accion-energy.com/shareholders-investors/corporate-governance/rules-governance/policy-book/>

The Policy Book was approved in 2021 by the Audit and Sustainability Committee





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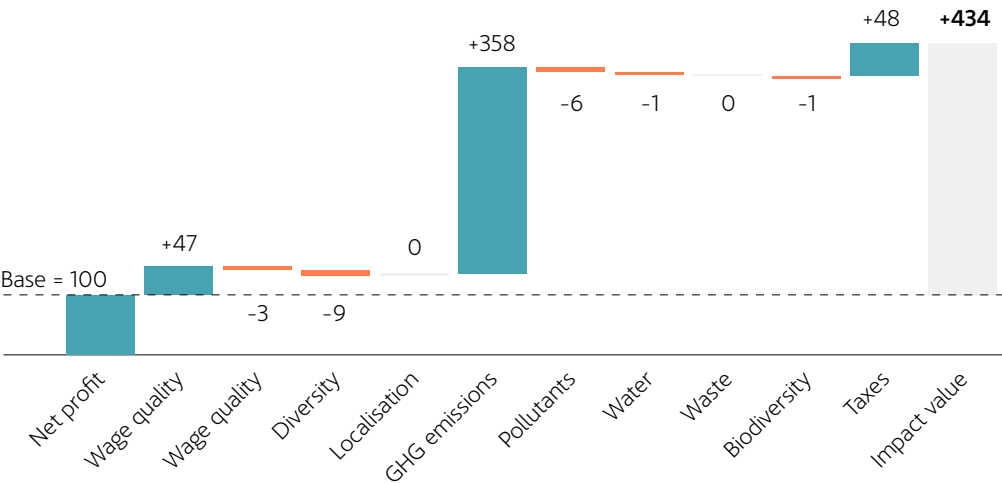
MONETARY VALUATION OF IMPACT

Investors are increasingly demanding information on the quantification and monetary valuation of the impacts deriving from business activities. ACCIONA Energía 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 for the company’s managers

ACCIONA Energía has drawn up an exercise to monetize the company’s externalities at a consolidated and country level. This involved calculating the social externalities using the Harvard methodology, and the environmental externalities using a variety of monetisation factors disseminated 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 generated in 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 in 2021, according to the IWA methodology (on the basis of net profit)



The externalities taken into account to calculate the value of the impact generated 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 when occupying 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 in all the value chain.
- > Emission of contaminants such as NOx, SOx and PM10.
- > Drinking water consumption.
- > Waste generation.
- > Occupation and transformation of habitats and their restoration.
- > Taxes borne.

It is estimated that the company’s activity contributes annually a direct benefit of 4.3 times its net profit. This added value is due principally to the quality of the wages paid, the green-house gas emissions avoided (82% of the value of impact) and the economic contribution to society, through the payment of taxes.

**i** More information on the Harvard Business School initiative: <https://www.hbs.edu/impact-weighted-accounts/Pages/default.aspx>



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# PEOPLE CENTRIC

Merit recognition	24
Diversity and inclusion	29
Transformative environment	31
Leadership	36
Access to rights	38

> Merit recognition	24	> Transformative environments	31	> Access to rights	38
> Diversity and inclusion	29	> Leadership	36		

# QUALITY OF LIFE, INCLUSIVE FUTURE OUR ADVANTAGE COMES FROM PEOPLE

ACCIONA Energía seeks to become the value proposal centred around people.

	Responsible	Resilient	Regenerative	
Leadership	Train for change	Visibility for transforming leadership	Exposure to regenerative challenges	Development of agents of change able to contribute a competitive edge
Diversity	Living wage	Zero gap	Inclusive boost	Be more diverse to be better
Recognition	Identification of critical positions	Mobility internal talent	Recognition aligned with impact	Enhance the model for greater recognition of excellence and outstanding effort
Environment	Ambition zero accidents	Smart working	Collaborative and healthy environments	Have a smart and secure workplace, a reflection of our values
Access	Due diligence	Evaluation and audits	Shared value	Ensure compliance with the fundamental rights of the people participating in our value systems



## KEY MILESTONES 2021

- > Deployment of functionalities in the internal tool of support of the life cycle of employees.
- > Top Employer 2021 in Spain certification and excellence in people management.
- > 20% reduction in the accident frequency rate involving its own employees and contractors compared to 2019.
- > Approval of the Diversity and Inclusion Policy. Development of programmes as Sustainable 50:50.
- > Update of the Policy on Human Rights, which defines the due diligence strategy.
- > Implementation of the Internal Control System of Social Safeguards.



## MAIN CHALLENGES 2022

- > Consolidate the leadership model defined in the people strategy.
- > Achieve the Top Employer certification in Mexico, USA, Brazil, Canada and Australia and the continental seal in North America.
- > Reduce the accident frequency rate compared to 2021.
- > Continue to increase the percentage of women in executive and managerial positions.
- > Increase the scope of the Rule on Welfare of Migrant Workers to more risk countries.
- > Update the Stakeholder Relations Policy.

◀ Merit recognition	24	› Transformative environments	31	› Access to rights	38
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In 2020, the company devised a global strategy called **People** in order to put people at the centre through five fundamental pillars: recognition of merit, diversity and inclusion, transformative workplace, leadership and access to rights. In 2021, a year in which the effect of the pandemic meant a disruption of people’s lives, People has consolidated as a proposal of value to employees and to society and it forms part of the new 2025 Sustainability Master Plan, being the first of its strategic lines, with defined targets at the same level as the economic and environmental goals.

The post-pandemic scenario presents a highly challenging context for the coming years in which the company will develop its activity in increasingly more global and complex environments. The People strategy invests in people to include and empower the best diverse talent that will make the company stronger and more agile to face new challenges as well as opportunities and lead change.

MERIT RECOGNITION

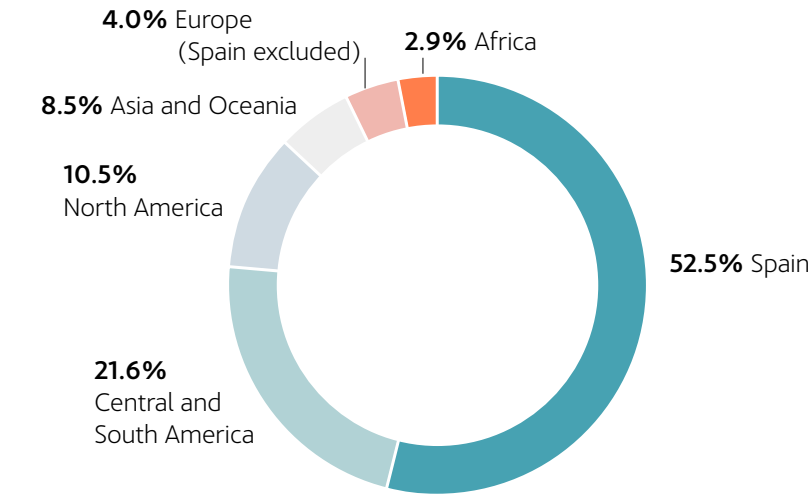
Employees, more than ever, want to feel that their contribution is recognised and want to have the opportunity to learn and grow. For this reason, the company promotes new forms of recognition that align the aspirations and priorities of people with the organisation’s needs.

Through the pillar of Merit Recognition, the aim is to reward the attitude and proactivity of the people that contribute in an exceptional manner, highlighting motivating and personalised experiences that reinforce the individual, team and the company’s performance.

PROFILE OF THE HUMAN TEAM

In 2021, the overall workforce of ACCIONA Energía was 1,762 people, of which 28% were women. All in all, there is a total of 45 nationalities within the company, with presence in more than 15 countries across 5 continents.

In 2021, the overall workforce of ACCIONA Energía was 1,762 people, of which 25% were women



Breakdown of the total workforce by geography (%)

2021 management indicators

Revenue (million euros)	2,449
Workforce cost/revenue (%)	6%
Revenue/workforce (euros)	1,403,748
EBITDA (million euros)	1,086
Workforce/EBITDA cost (%)	14%
EBITDA/workforce (euros)	616,345
Workforce cost (million euros)	150

DEVELOPMENT AND PROMOTION OF TALENT

ACCIONA Energía’s people management is supplemented by policies and initiatives designed to optimise employee performance, enhance their professional development in the company and manage objective-based compensation. The Performance Management Model is based on three pillars: Setting Objectives, Development Programmes and Performance Status.

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Development programmes

The development programmes have become 100% online and are targeted at groups identified as high performance and potential, according to their rank in the company:

**Programme for Technicians:** 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.

**Career fast-track programme:** the purpose of this programme is to promote the development and fast-track the career of those professionals in pre-managerial roles who have obtained good results in a sustained manner over time and are identified as having high potential. The programme consists of four sessions for each of the key competencies and one on-the-job action session and with the option to participating in a mentoring process.

**New Manager Programme:** jointly designed with the *joint venture* of 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 field of leadership, innovation, persuasion and global business vision. At the end of the programme they can participate in a mentoring process.

**High-potential Women’s Development Programme (HPWDP):** the purpose is to offer structured and comprehensive training aimed at preparing participants to assume managerial responsibilities of any kind, through a multi-disciplinary training perspective, strengthening the concepts of engagement, hard work and responsibility.

Performance Status

ACCIONA Energía has carried on applying the identification process of performance and potential, Performance Status, as a way of providing a comprehensive view of internal talent and enabling decision-making and action plans to be designed on the basis of the needs detected.

The Performance Status process is the global tool for evaluating performance and potential. During the 2021 process, the target group was 1,708 professionals, 97% of the total.

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

	Men	Women	Total
Directors and managers	361	115	476
Technical staff	614	330	944
Support staff	3	25	28
Operators	252	8	260
Total	1,230	478	1,708

Internal mobility

The commitment to internal mobility promotes the availability and fitting of talent in an efficient manner, and the adaptation of the person/position, thus contributing to the motivation, development and career progress of the group of employees of ACCIONA Energía.

The main aims of the corporate framework of internal mobility are:

- › **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.
- › **To develop a route for internal promotion instead of external recruitment,** thus conserving internal expertise, and promoting the company’s economic and operating efficiency.

◀ Merit recognition	24	› Transformative environments	31	› Access to rights	38
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Thanks to the implementation of the internal mobility portal that offers visibility of all the vacancies announced, as well as communications focused on mobility and the weekly newsletter that includes major job offers, the number of applications for a post from employees exceeded 400 this year. The number of vacancies filled by internal mobility was 18% in 2021.



## Bringing management closer to people through digitization

- › The opening up of the Workday single people management platform to all the company’s professionals meant an important deployment of functionalities that provide support to the life cycle of employees and contribute to the standardisation of processes based on reliable, consolidated data that can be accessed online.
- › In 2021, more than 2,000 employees from 20 countries were included in the platform and more than 76% of users within the company have accessed it regularly.
- › Thanks to the implementation of the people management tool, the company now has a recognition programme based on internal visibility called the Global Talent Marketplace. All the vacancies are posted internally and can be accessed by the employees, facilitating transparency and equal opportunities.

### Some of the results obtained:

- +24,000 applications received for vacancies.
- +20,000 training hours in digital courses and more than 1,900 employees enrolled since launch.
- +1,700 employees in the Salary Review process.
- Implementation of functionality of the Home Office programme with the participation of 503 employees.

## COMPENSATION POLICY

ACCIONA Energía rewards its employees according to the following criteria: sectoral and geographical competitiveness, internal equity and merit. The company, with presence in more than 15 countries, works in several productive sectors based on current law. Employees’ pay is subject to the applicable collective bargaining agreements. In 2021, in Spain, 9 agreements of varying scope were managed.

The remuneration of employees is defined according to results and a position classification system that objectively organises each worker’s contribution to the company. In addition, there is no gender-based differentiation and any decision on individual payment review is approached objectively, ensuring that the compensation is fair according to the level of responsibility and the contribution to the enterprise’s objectives.

### Gender pay gap analysis

ACCIONA Energía is determined not to have in its activity any kind of payment gender inequity, and for this purpose, it developed a salary analysis methodology based on best international practices, which was validated by an independent external party.

According to the definition of “equal pay”, compared to the definition of “salary data”, the calculations must isolate all those variables that might explain a person’s salary above and beyond gender. In ACCIONA Energía’s case, the following independent variables must be taken into account: country, professional classification, map of levels (business role compared to support role) and collective bargaining agreement.

This estimate determines standardised segments of population in which differences can be measured, providing a high degree of reliability that gender pay gaps are effectively addressed.

The following formula is used to determine the fairness of each segment:

➤

Equal pay per segment =

(average fixed salary for men-average fixed salary for women)

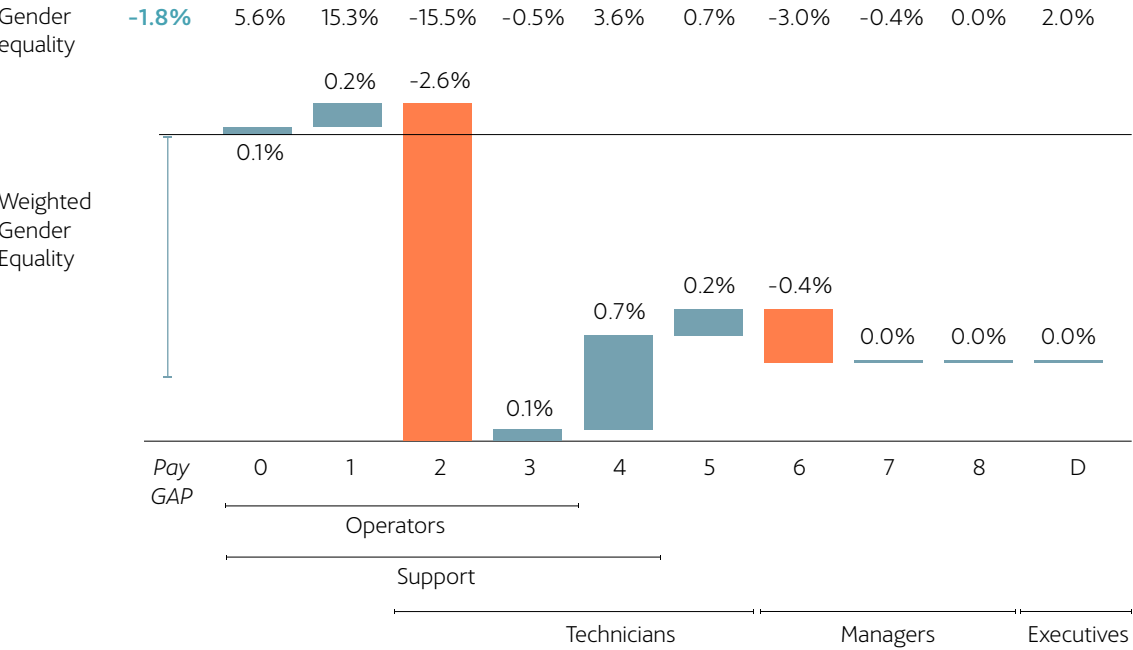
average fixed salary for men

Specifically, in 2021 ACCIONA Energía found a gender pay gap globally of -1.8%. In other words, the company’s women receive slightly higher pay in a balanced way. This is higher than in the previous year, when it was -0.9%



◀ Merit recognition	24	› Transformative environments	31	› Access to rights	38
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Gender pay gap analysis



With this information, the data is studied annually 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 detected cases of this type of inequality. Each year, a specific analysis of unequal pay situations is also carried out through the annual salary review process. This action plan is periodically monitored by management, which assesses the progress being made at each level of the organisation.

Variable remuneration plan: ACCIONA Bonus

The programme for employees with variable remuneration, in place since 2012, takes into consideration criteria such as the company’s financial results and the fulfilment of individual goals. It is based on objective and pre-established metrics. In accordance with the objectives set out in the Sustainability Master Plan (SMP), ACCIONA Bonus is applied in key countries.

In ACCIONA Energía 1,560 employees were eligible to the 2020 ACCIONA Bonus paid in 2021 that includes 100% of the executives and 92.6% of managers and technical and support staff. For the payment of the 2021 ACCIONA Bonus there are 1,816 employees eligible to receive bonus for the results achieved.

Standardised structure of objectives that make up the bonus

ACCIONA Energía's overall results	Specific targets	Individual goals	Criteria linked to sustainability
Represent 10% for all employees and 15% for directors.	Relative to the country, or business unit with its own income statement.	The basis is the individual assessment of performance.	They represent 5.6% of the targets.

The ACCIONA Bonus has incorporated targets for reducing emissions of polluting gases, implementation of the methodology for evaluating the social impact of the projects, an increase in the number of women in management and consultations with stakeholders, amongst others.

In the ACCIONA Bonus to be paid in 2021, managers can make the proposal for meeting individual objectives for their teams in the Salary Review tool, which applies to the calculation of the individual targets. The criterion for this tranche will be established according to the personal contribution to the results of the business. For guidance purposes:

- > The specific contributions (individual objectives) and the technical excellence in the work that contributes to progress made in the income statement.
- > The 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 transforming projects: sustainability, digitization, etc.
- > Contribution to the multidisciplinary and multifunctional work teams.
- > Contribution to the results in terms of flexibility and capacity to adapt to the requirements.

Employee benefits

The employee benefits offered by ACCIONA Energía in 2021 include:

- > **Financial coverage** of ACCIONA Energía worldwide to employees who were in hospital for COVID-19 more than 5 days.
- > **Accident coverage:** covering the commitments undertaken in the different collective bargaining agreements that may apply and accident policies insuring expats and their families in case of an incident that causes death or absolute permanent disability.
- > **Life assurance:** insuring the commitments assumed in collective agreements in case of death or disability for any reason.

◀ Merit recognition	24	› Transformative environments	31	› Access to rights	38
› Diversity and inclusion	29	› Leadership	36		

- › **Travel assistance:** applicable to the employees of all ACCIONA Energía’s business who travel for work reasons and covers the health assistance that they may need during their trips, as well as loss of suitcases, flight connections, repatriation of remains, etc.

In addition, the Flexible Remuneration Plan allows the company’s employees to optimise their salaries. They can select, acquire and/or hire certain benefits that are heavily discounted, which will allow them to maximise their remuneration. In Spain, in 2021, the number of employees that may choose this plan in ACCIONA Energía was 1,048. In total, approx. 37% of eligible employees (388 people) used this plan.

Meanwhile, the Shareholders’ Plan is a voluntary company share purchase programme that allows ACCIONA Energía’s professionals to buy a stake in the company’s share capital. This plan is aimed at all permanent employees who are tax residents in Spain and offers a tax break. 172 of the 946 eligible employees of ACCIONA Energía took part in the 2021 Shareholders’ Plan, a decrease of 14% compared to the previous year, with a total of 8,694 shares delivered.

SELECTION POLICIES

The Selection function intends to attract the best talent at the right moment, creating innovative and competitive strategies to position ACCIONA Energía as a reference employer and offer a differential experience to our candidates. The function is based on 4 key pillars:

- › **Brand as an employer.** The reputation as employer is framed in the commitment to sustainable employability, based on the early identification of talent, investment in the development of our employees and offering international opportunities. ACCIONA Energía forms part of ACCIONA group which has been given the Top Employer 2021 in Spain certification, confirming it as one of the best companies to work for in Spain and endorses the company’s excellence in human resources management.
- › **Search strategies.** ACCIONA Energía has positioned itself as a reference company in the main channels for attracting talent globally. It designs innovative strategies that ensure the visibility of our global and local offers, responding to the extensive portfolio of profiles and commitment to diversity. The company connects with the market to identify trends and best practices.
- › **Selection methodology.** The same methodology is applied globally ensuring coherence and high quality standards in all the processes.
- › **Candidate’s experience.** For ACCIONA Energía, people are important and the company connects with talent and values diversity. The company continuously reassesses its processes, with the candidate’s experience being at the centre.

With the model to create a global worksite, we respond to the needs of ACCIONA Energía in the medium and long term, generating talent attraction from the beginning of the professional career, thus generating an environment of opportunities to promote development in the company.

For this purpose, we have developed different programmes that implement this model:

- › **Academy Programme:** a programme in which young students may extend their networking, being in contact with the group’s employees. They learn *soft skills* and sustainability through practical challenges adapted to the company’s reality. There were 2 new programmes in 2021 and more than 70 students trained globally.
- › **Trainees’ programme:** a programme to put into practice the knowledge acquired at university and provide an opportunity for participants to start their professional career in the company. They are given different activities and training, which contributes to their development and growth. 18 trainees were incorporated in the 2021 program.



Global Graduates Programme

The programme is aimed at graduates who have just come out of university (with up to 2 years’ employment experience), who will be able to obtain a postgraduate qualification, given by a business school, which gives knowledge, skills and tools to discover and make maximum use of their potential in the first stage of their professional life.

After having completed the first year in the company, the graduates acquire transversal knowledge and skills through 4 modules (Finance & Strategy, Project Management, Sustainability and Future Societies) to put into practice in any professional context of ACCIONA Energía.

In each of the modules the participants work as a team through different projects that promote critical thinking, creativity, communication skills and effective interaction capacity.

This programme has generated a global community of Graduates in which cooperation and the creation of a network of contacts is promoted from the beginning of the professional career.

In total, 14 graduates in ACCIONA Energía participated in the second session of the programme in 2021.

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Evolution of new hires (no. of employees)

2020			2021		
Men	Women	Total	Men	Women	Total
152	53	205	264	128	392

DIVERSITY AND INCLUSION

ACCIONA Energía understands and promotes diversity as a key competitive advantage for our businesses and equality and inclusion as priority responsibilities in the people management model. Equally, these are essential conditions for the defence of human rights, sustainable development and compliance with the 2030 Agenda.

The company’s policy on Diversity, Equity and Inclusion develops our commitment to diversity, which includes developing diverse talent, respectful treatment, equal opportunities and the promotion of social cohesion through equity and inclusion.

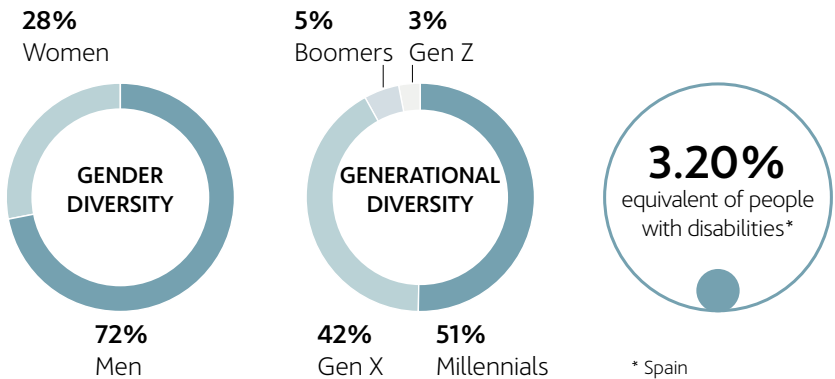
ACCIONA Energía relies on a Diversity and Inclusion Committee. The mission of this committee, composed of employees who represent diverse groups, is to create a network of ambassadors, collect information from their environment, share the best practices and generate proposals on diversity, equity and inclusion.

THE SUSTAINABLE DIFFERENCE

ACCIONA Energía is formed by 1,762 persons

Diversity and local impact

45 nationalities  
20 countries



The reporting system enables us to continuously make progress in identifying diversity indicators. For this purpose, the company has launched the project “Sustainable Difference”: a digital tool which, by means of key indicators, provides real-time information to managers linked to their targets, to manage diversity in their teams, follow the achievement of their targets and make the best decisions based on data.

GENDER DIVERSITY

ACCIONA Energía promotes the full inclusion of women and their leadership. To this effect, work is based on two key lines:

- > Ongoing review of the Human Resources processes to promote the attraction, retention and promotion of talent in the different stages of women’s professional careers.
- > Promotion of an inclusive culture to contribute to eliminating the barriers impeding equal opportunities in the workplace.

New programmes to promote gender diversity

- > **Global mentoring programme for pre-executive women**, 13 female employees participated in the 2020-2021 programme to promote female talent and the leadership of the company’s women.
- > **Global programme to fast track women with potential** in which 19 female employees participated, 15 in the first quarter of 2021 and 4 in the last quarter, boosting and fast-tracking the career of pre-executive women.
- > **Executive Development Programme for Women with High Potential**, aimed at women with clear career pathways. In the 2021 edition, a total of 7 women successfully completed the programme.
- > **Programme for Women Returning** to the labour market focussing on providing employment opportunities for women with family responsibilities who are at risk of social exclusion.
- > **Programme for the development of skills in Mexico** for women in which 33 women participated from all the areas and roles.

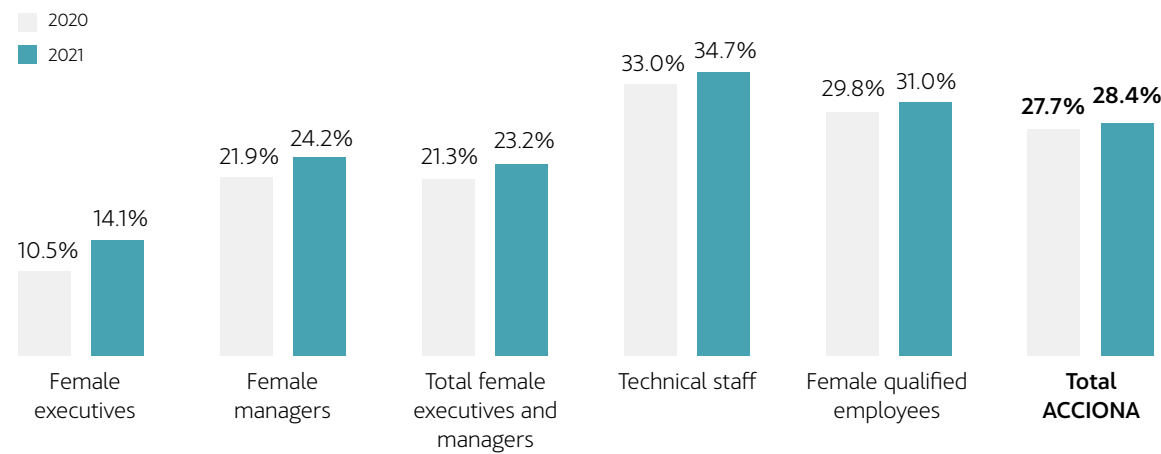
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In terms of recruiting, the hiring of women has been promoted, ensuring that at least one woman’s CV will be included in all the selection processes. In 2021, 33% of the new employees in ACCIONA Energía were women compared to 26% in 2020.

Based on the set objectives, these actions pursue to increase the number of women in management and executive positions, achieve equal pay and promote women’s leadership programmes. The achievement of these objectives is linked to ACCIONA’s bonus.

At the end of 2021, the percentage of women in executive positions was 14.1% and the percentage of women in executive and management positions globally was 23.2% compared to 21.3% in 2020. This percentage in Spain is close to 25%.

Evolution of the percentage of women by category (% of staff)



In Spain, the company has Equality Plans, in accordance with Organic Law 3/2007 for effective equality between men and women, signed with the most representative trade unions and in which the results are reported and evaluated jointly every six months. The Equality Plan is published and available on the Intranet for everyone in the company. Also, in 2021 ACCIONA Energía renewed the Gender Equality in the Workplace Distinction.

To endorse the commitment to effective equal opportunities, communication and awareness-raising campaigns are carried out, giving visibility to the company’s professionals and projects led by women, in recognition of their reference role and their leadership.

50:50 Sustainable Projects

The “50:50 Sustainable” initiative actively promotes female participation and leadership in projects and production centres, thus promoting their full inclusion in sectors in which their contribution is not sufficiently represented, as well as in the energy sector.

Through reskilling and upskilling policies and programmes we:

- > Identify internal female talent and promote it to key positions.
- > Reconvert profiles to site qualified staff and offer employment opportunities.
- > Improve female employability to introducing them to critical sectors of the economy.
- > Generate models replicable by other women, contributing to eliminating still persistent stereotypes regarding female presence in certain activities.

In 2021 the “50:50 Sustainable” Projects were:

- > **Project Grid Code Conecta 50:50, Spain.** 50% of women in the grid code team enabling energy project interconnection.
- > **Agora Energía Spain Project.** Programme for the inclusion of women in Wind Power Production in identified positions.
- > **Energía Chile Project.** Pool of female talent for maintenance operators in different wind farms and plants operating in Chile. Working hand-in-hand with nearby universities.
- > **Women in the Energía Mexico Isthmus Project.** Programme for attracting, selecting and developing indigenous women in the area of maintenance and operation. 10 female engineers were hired through this programme in 2021.
- > **Equipo Rosa. Puerto Libertad, Sonora, Mexico.** Programme to create long-term employment for women in vulnerable situations in the community in which the wind power operates. 40 trained and hired women.

WORKPLACE INCLUSION AND NON-DISCRIMINATION

The Policy on Diversity, Equality and Inclusion, the Policy on Human Rights and the Code of Conduct of ACCIONA Energía promote real equal opportunities and do not tolerate any type of discrimination in the professional sphere 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 condition.

Inclusion of people with disabilities and vulnerable groups

ACCIONA Energía relies on the talent contributed by people with disability. In this respect, the company set itself the objective of increasing the percentage of people with disability in the staff to 5% in Spain by 2025 and exceeding the regulatory frameworks in key countries.

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To achieve this, the company works on the following lines:

- > Programme of Scholarships-Practices ONCE Foundation-CREU Spanish Universities: an initiative that promotes the full participation and equal conditions of people with disabilities and improves the professional career of university students with disability and facilitates access for to their first employment experience.
- > Identification of inclusive positions.
- > Global training programme about disability available in several languages.
- > Face-to-face awareness raising workshops for recruitment teams and managers discussing the opportunities and advantages of recruiting people with disabilities. The focus is on identifying and eliminating attitude barriers.
- > Actions for taking the recruitment and acceptance further than adapting to the job, to facilitate the participation of people with disabilities under equal conditions.

In 2021, ACCIONA Energía in Spain recruited an average of 27 people with a 33% level or more of disabilities. Of the total workforce, the disabled population represents 3.20% (4.07% in 2020). Direct employment accounted for 1.26% (1.60% in 2020) and the rest comes from the contribution through purchases from Special Employment Centres and donations to third sector organisations.

The division of Energía, as part of ACCIONA group, holds the Bequal certificate –with a Bequal Plus rating– which, through an external audit, certifies compliance with the law and commitment to inclusive disability policies.

Inclusion of other minorities

ACCIONA Energía does business in more than 15 countries and, as an employing company, 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 human rights of the local communities and the people living and working in them and makes an effort to create positive impacts that improve the life of these people. In this respect, it promotes local recruitment and protects minorities. To do so, it develops specific plans in its projects that include training, awareness-raising, elimination of barriers, local recruitment and collaboration with bodies and institutions.

AWARENESS AND DEVELOPMENT OF CAPABILITIES IN DIVERSITY, EQUITY AND INCLUSION

ACCIONA Energía promotes actions that raise awareness among professionals and stakeholders on possible unconscious prejudices that may hinder skills to become more inclusive. Thus, it develops training initiatives in equality, diversity and inclusion, biases, non-discrimination and multiculturalism through several training pathways in order to contribute to the creation of a more inclusive culture and environment. In 2021 a total of 4,528 hours of training were given.

RECOGNITION AND IMPACT

ACCIONA Energía has been accredited with the “SELLO RECONCILIA” certification model that recognises companies that actively work for conciliation.

As a company of ACCIONA group, the following commitments and recognitions are worthy of note:

- > In 2021, the Refinitiv Diversity & Inclusion Index has ranked ACCIONA in the 36th position of the best companies worldwide in diversity and social inclusion being the only company of the construction and engineering sector included in this group.
- > Furthermore, ACCIONA is a signatory of the “Women’s Empowerment Principles” of the UN Global Compact, an initiative that pursues real and effective gender equality at work with seven action principles in the labour, social, training, as well as health and welfare fields.
- > As a corporate partner of the Global Compact, ACCIONA has adhered to the Target Gender Equality project to speed up the contribution to the SDG 5 to achieve gender equality.

TRANSFORMATIVE ENVIRONMENTS

The work environment is a scenario of opportunity for the transformation of the business culture. For this reason, it promotes a diverse and inclusive, collaborative and innovative work environment, adapted to new working methods and the future needs of the company, with technology as a facilitator.

As a company, ACCIONA Energía aspires to become the best place to work, in which all the people can participate and prosper, and in which professionals may improve their experience in the work environment day by day.

ORGANISATION OF WORKING TIME AND THE WORK-LIFE BALANCE

The company is committed to conciliating personal and professional life as a means of promoting genuine equality. In this line, it relies on conciliation measures, that go beyond complying with the law, in all businesses and geographies.

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

- > Support programme for pregnant women with working days of six hours with no reduction in salary, parking spaces and economic assistance for travel to medical tests.
- > Programme for mothers and fathers with measures introducing a flexible working day with no reduction in salary, which they can enjoy when they return from their maternity and paternity leave, respectively.
- > Programme for parents with children suffering from serious illness, with a part-time working day with no reduction in salary, complementing the legal frameworks in each country.
- > Improvement of the policy of advances for cases related to child care in those countries where the tax system allows this.

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Furthermore, in Spain these measures are complemented with others already in existence, such as flexible entry and exit times, *home office*, short work day on Fridays and in the summer, as well as canteen services, medical centres, physiotherapy and sports clubs, which are the main measures available to the employees. In countries such as Australia, the US and South Africa there are measures for flexible working hours after maternity/paternity leave and for childcare, which are higher than the legal minimums.



## Home Office

As part of the People strategy to improve the environment,new work models were introduced in 2021 called the Home Office pilot programmes. These programmes were implemented with the threefold aim to generate value for the employees, the company and society.

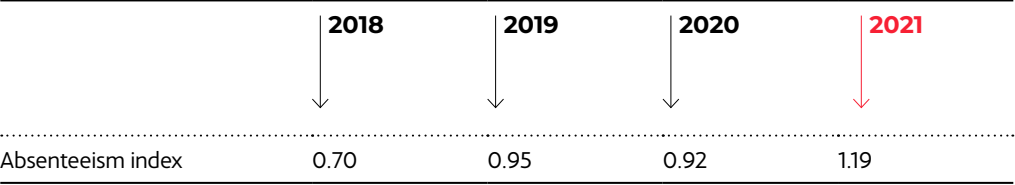
With this initiative, employees have reinforced their commitment and gained flexibility, while the company has improved its talent attraction, increased productivity and efficiency of space use. In addition, there has been a reduction in CO<sub>2</sub> emissions associated with reduction of travels which is beneficial to the whole of society.

- > The programme was launched in Spain, Brazil, Chile, Mexico and the US.
- > In Spain more than 503 people, among managers, technical people and support staff, that is, more than 67% of the eligible group, are currently participating in the pilot programme.
- > The pilot programme was implemented in waves and reviewed with relevant satisfaction surveys which has enabled us to design and test the model. With this, feedback was acquired to improve the model and enable its implementation in the long term.
- > The degree of satisfaction in Spain is 96% among the managers and 98% among the employees. Also, 98% of managers and employees consider that there has been a positive impact on productivity.

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

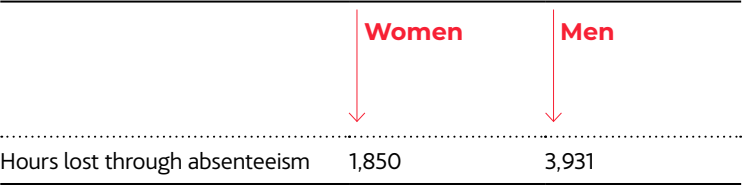
The absenteeism rate increased by 29% compared to the previous year. The reason is the coronavirus disease pandemic. Although this disease also affected the absenteeism rates of 2020, in 2021 the absenteeism rate increased because of an increase in the physical presence of the employees at the workplaces and the rise of other kind of diseases derived from the pandemic.

### Evolution of the rate of employee absenteeism



Absenteeism rate: (no. of days lost due to absenteeism/no. of days worked) x 100 It only applies to Spain, no data is available from outside Spain.

### Number of hours lost due to absenteeism in 2021



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. It only applies to Spain, no data is available from outside Spain.

### Employee satisfaction and commitment

People's satisfaction and commitment are the key attributes of the relationship model that ACCIONA Energía aspires to maintain with its employees. 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 perform the company's strategy and position it for a successful future.
- > To establish a specific metric system to follow up the evolution of the employees' commitment. To also analyse the correlations between the commitment and the pillars and the objectives of our SMP 2025.
- > To identify support measures based on factors such as the following: knowledge of our critical transformation levers, satisfaction with SMP's key objectives, strength of the brand ACCIONA Energía locally to attract talent, promotion of a work environment that values diversity and the perception of internal advancement towards an inclusive culture.



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The methodology used to measure the commitment of the employees is Kincentric. In the results from the 2021 survey, ACCIONA Energía shows 72% *engagement*, 5 points higher than the average benchmark. This data also means a difference of 3 points compared to the latest survey in 2019 (69%).

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

Turnover among men	5.97
Turnover among women	4.53
Turnover of people under 30	9.88
Turnover of people 30-50	5.01
Turnover of people over 50	4.04
Turnover in Spain	3.14
Turnover of people working outside Spain	9.12
Total turnover*	5.61
Voluntary turnover**	4.95
Average hiring cost per employee	€1,200

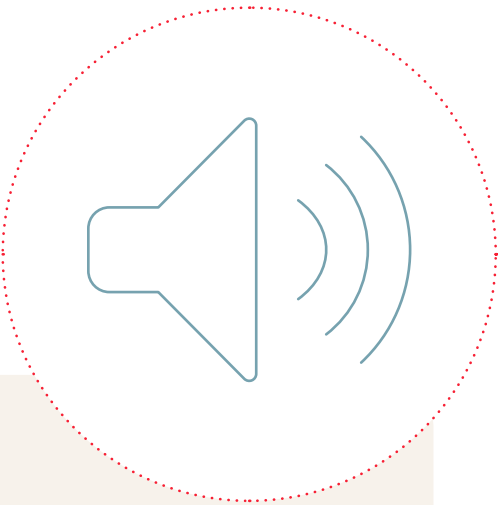
\* Total turnover = total no. of departures/employees.  
\*\* Voluntary turnover = no. of voluntary departures of employees with indefinite contract / employees with indefinite contract.  
Since January 2021 data managed through Workday is taken, which allows for the incorporation of a broader type of movements of people joining/leaving that reflect a more accurate picture of turnover in the company.

HEALTH AND SAFETY

The health and safety strategy revolves around the Human Resources and Occupational Risk Prevention Policy and the action plan that ensures its objectives are in line with the SMP 2025. In 2021 the specific action protocols already defined in 2020 to preserve the health of people in the pandemic situation were maintained.

ACCIONA Energía has an Integrated Management System for occupational risk prevention for the entire company which establishes the minimum health and safety requirements that should be taken into account in any of its companies and countries. In 2021 the certification in all of its companies in accordance with the ISO 45001 standard was maintained.

The company's safety and health strategy is based on excellence (zero accident target), continuous improvement and support to employed and subcontracted personnel. The possible risks involving health and safety at work arise from two of its main activities: construction and operation and maintenance of facilities.



Identification and management of occupational risk

The identification of any possible labour-related risks, their assessment and control measures for minimising the probability of them occurring is documented in specific procedures for each facility. The risk analysis determines the points that are critical in each centre and the associated preventive action, which affects not only its own employees but also those of contractors and firms collaborating with the division.

In addition, the facilities have their own emergency plans with guidelines on how to proceed in emergency situations. Employed or subcontracted personnel can report any hazardous situation they detect by means of an event and hazardous situation management tool (ENABLON). On the other hand, any person that identifies a risk in any of the facilities may communicate it by sending a message to the email address [safety.energy@acciona.com](mailto:safety.energy@acciona.com).

As a highlighted good practice, ACCIONA Energía makes and publishes safety alerts on its web site involving any incidents from which lessons have been learned that could be of interest to the sector (<https://www.acciona.com/our-purpose/work-with-us/safety-health-well-being/>).

ACCIONA Energía carries on with its commitment to provide a safe work environment as a member of the Global Wind Organisation (GWO) for the promotion of occupational health and safety standards in the wind energy sector worldwide. This platform promotes safe working environments based on the technical qualifications of the professionals working in the sector, especially in countries where the level of training is lower.

The organisation uses the representative bodies required by the laws in the countries where it operates, such as the Health and Safety Committees in Spain, as a channel for consultation and participation. Employees also have communication tools through which they can report occupational safety incidents or possible threats.

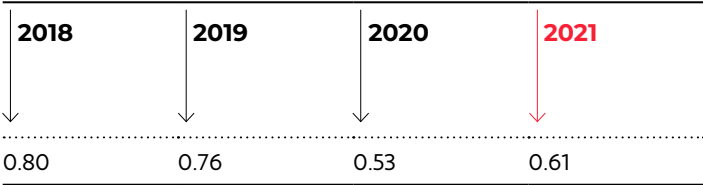
The company has defined and implemented a strict management programme for the safety and health of its contractors, which includes selection parameters, mechanisms of planning and control and assessments of the services rendered. On the other hand, ACCIONA Energía actively

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cooperates with the Public Administrations, such as the European Agency for Occupational Safety and Health, in initiatives to promote health and safety in the workplace.

The accident frequency rate with sick leave of employed and subcontracted personnel increased owing to the reduction in the total hours worked, especially in the construction activity.

Evolution of the frequency rate for employees and contractors



Coronavirus pandemic protection

Since March 2020, the following protocols and guidelines have been created, which have been adapted to the different contexts and levels of risk of infection:

- › **Action protocols and guidelines.** The objectives of these are to mitigate the health risks, identify the possible impacts of the health crisis on the company's activities, establish the management criteria necessary, and implement the measures decreed by the relevant authorities. They help to prevent infection and guide the actions to be taken.
- › **Remote working.** Remote working measures have been implemented in all the countries where the company operates, limiting the possibility of infection.
- › **On-site safety.** To guarantee the health and safety of all its employees in all the active services, the company has made protective equipment and the necessary hygiene measures available to them.
- › **Health Clinic.** The medical video-call service has been reinforced to deal with any medical queries employees might have.

The company has maintained a proactive approach, providing human and material means for early detection and effective control of transmission, carrying out screening diagnostic tests from the outset of the pandemic, and actively monitoring the cases detected and the contacts identified.

Evolution of the principal accident indicators

Since 2018, the severity rate and the frequency rate went down by 73% and 40%, respectively. The improvement was a consequence of the progressive improvement in preventive management and culture that has been applied for many years. In 2021, although there were less accidents -6 men and no women- than in 2020, the rates increased owing to a reduction in the working hours in construction activities. These tasks have historically less accidents than the operations and maintenance tasks.

Evolution of accident indicators for employees

Severity index				Frequency rate			
2018	2019	2020	2021	2018	2019	2020	2021
17.7	19.4	0.5	4.8	0.5	0.4	0.1	0.3

Targets set for 2022:

- › Decrease by 15% the average of the last three years of the accident frequency rate with sick leave of employed and subcontracted personnel.
- › Extend the DRIVE SAFE programme to three new regions: Australia, South Africa and the rest of Europe (already in place in Spain).
- › Consolidate the compliance with the *Contractors' H&S Management* guidelines in all the activities and regions.

Since 2018, the severity rate and the frequency rate went down by 73% and 40%, respectively

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## Act Safe and Build Safe projects

The company relies on two initiatives with a common structure and operation but with their own particular characteristics: Act Safe and Build Safe.

Programmes in common include: “Preventive Observations”, “Personal Action Plan” and “Rules that Save Lives”; and, in particular, we find actions such as training on “Risk Factor” in operation and maintenance (O&M) of facilities or the “Learning from Major Incidents” programme included in Engineering and Construction (E&C).

Both projects rely on their own Management and Performance Committees, led by the management of both departments with the active participation of the heads of the different businesses. They also have a diagnosis made by DUPONT regarding the situation of the O&M and E&C services within the Bradley Preventive Culture curve.

Thanks to these projects the initial situation and what is to be achieved in the coming performance years were identified.

### Road safety

In 2021 initiatives in road safety continued, specifically the launch of the Drive Safe Programme in three countries (Mexico, Chile and Spain) to prevent occupational commuting and in mission accidents. The results have been positive and, therefore, its progressive implementation will continue in the rest of the countries.

This programme was presented as a Best Practice example in the European Road Safety Agency, in which, ACCIONA Energía has renewed its commitment. The programme has several action levers as training requirements for drivers, driving habits and requirements that company vehicles must have to planning work-related travels.

Still, accident rate data will require continued efforts in this regard in the coming years. Commuting accidents were 15 and in mission were 4.

### Evolution of commuting and in mission accidents (with and without medical leave)

	2018	2019	2020	2021
Commuting accidents	20	11	12	15
In mission accidents	2	2	5	4

### Health monitoring and healthy lifestyles

To evaluate the possible impact of occupational risks on the health of workers, annual medical check-ups are offered (adapted to the specific risks of each worker). Moreover, this medical data is used to conduct an annual epidemiological study on a global scale to assess the health of ACCIONA Energía as a whole.

The company also runs disease prevention and early detection campaigns. It also monitors workers who travel internationally, providing them with preventive medical information on the destination area and immunisation if necessary. The company enters into agreements with private health companies, offering appropriate services and conditions.

As in previous years, there have been no professional diseases.

ACCIONA Energía has a Health and Wellness Programme to promote integral employee care. It is a three-part programme focussed on a healthy diet, physical activity and emotional management. The initiatives developed as part of the Health and Wellness Plan include:

- › Medical video-consultation 7 days a week in Spain for employees and health advice in face-to-face consultation.
- › Identification, monitoring, awareness-raising and training on stress at the work station.
- › Publications on general health topics, pregnancy and breastfeeding, ergonomics and the COVID pandemic.
- › Health monitoring programme for COVID-19, with medical diagnostic tests for early detection and control of the spread of the virus.

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Extending the commitment to prevention to the supply chain

ACCIONA Energía’s occupational safety policy establishes that the requirements for preventing risks are the same for employed and subcontracted personnel. At the time of contracting, all suppliers must undergo an assessment of their performance in this area. The company’s contract is thus contingent upon effective implementation. ACCIONA Energía has measures in place that cover all phases of the process, from tendering to completion:

- > Corporate bidders must answer a questionnaire to show proper safety and health management. Only the companies that show the minimum level required pass the first screening.
- > The score in Safety and Health influences the final selection of the supplier.
- > The planning of the works to agree on the safety measures is materialised in several obligatory meetings before the commencement of the works.
- > All the activities carried out by the Contractors are monitored and controlled.
- > The management boards of each project or activity integrate to the same extent the performance of safety and health of employed and subcontracted personnel.
- > During the service hired and when it finishes an assessment of performance in safety and health is carried out to identify lessons learnt and to condition future bids from the supplier.

In addition, the division periodically organises “meeting points” with suppliers to share experiences and agree on health and safety actions to be taken. In 2021, these meetings were held online owing to the worldwide pandemic restrictions.

Evolution of accident indicators for contractors

Severity index				Frequency rate			
2018	2019	2020	2021	2018	2019	2020	2021
22.0	24.4	7.7	12.6	0.6	0.8	0.7	0.8

LEADERSHIP

Leadership is one of the four pillars of the global people management strategy of the People programme of ACCIONA Energía. The company promotes leadership models in which every employee can take responsibility and share the company’s purpose so that the whole organisation is aligned to meet the objectives.

MANAGING KNOWLEDGE

ACCIONA Energía’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.

Technical Leaders Programme and Network of Experts

ACCIONA Energía 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 high-value technical skills, 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 5 Technical Leaders and 35 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.

In 2021, the initiative carried on being successfully implemented. The following milestones must be highlighted:

- > Launch of knowledge management platforms and open training.
- > Launch of the Digital Transformation / Mastering Digital Skills programme for this group, carried out in conjunction with the Polytechnic University of Madrid (UPM).

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CORPORATE UNIVERSITY

The mission of the university is to ensure training and ongoing development of the whole workforce.

Investment in training (euros)

	Directors and managers	Technical staff	Support staff	Operators	Total
Total investment	1,188,885	1,308,499	44,383	324,189	2,865,955
Investment per employee/year	2,702.01	1,419.20	652.69	976.47	1,626.54

The Corporate University has developed a process for evaluating the effectiveness of training:

Evaluation levels

Reaction	Learning	Behaviour	Results	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 2021, evaluations were carried out at levels 1, 2 and 3.

ACCIONA's training programmes are continuously reviewed and adapted to the new needs of the company and its professionals.

The aim for 2022 is to extend the learning model to unemployed people, for example: communities related to the execution of our projects and other citizens, to cooperate from training to social welfare, and to the possibility of professional improvement.

New topics were analysed for 2021 in the various schools.

Business School

The business school programmes have moved to a 100% online format:

- › **Executive MBA:** programme jointly designed by the School for Industrial Organisation and ACCIONA to supply our *managers* with business transversal tools. 10 professionals from ACCIONA Energía from different countries around the world attended this training initiative.
- › **Global Executive Programme:** to share knowledge with internal and external experts, 7 executives were awarded an attendance certificate for this programme created jointly with the IE Business School - Financial Times and ACCIONA.

Technical Skills

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

- › **IMPA, International Master in Project Administration:** one student was awarded the global Master's Degree offered in collaboration with the Polytechnic University of Madrid. Focused on developing our Project Directors, the post-graduate course consolidates its leadership role and provides tools to develop project management skills.

Grid-Code

Increased renewable energy globally makes the connection of plants to the grid increasingly more complicated. Thus, the Power Systems/Grid Code team received training to respond globally to the requirements and processes for interconnection of projects in all countries. 29 people form part of this group.

Workday Learning and Pharos

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.

Reskilling

Training project in new professional skills aimed at external people according to the social impact management goals of ACCIONA Energía.



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ACCESS TO RIGHTS

WORKERS’ COVERAGE (GRI 2-30)

At ACCIONA Energía, practically all groups of employees are covered by collective bargaining agreements in the different countries where they operate. In certain markets, in which the regulatory framework is in the process of activation, there may be small groups of workers who are not covered, although these would in any case represent less than 1% of the total workforce.

Employees covered by collective bargaining agreements by country (%)

Country	Employees covered by collective bargaining agreements
Spain	100%
Australia	100%
Chile	100%
United States	100%
Mexico	100%
Rest of the world	100%
Total employees	100%

Collective agreements and/or conditions are signed at all construction sites 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 Energía 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.

The company currently manages employees adhered to 17 agreements (8 in Spain and 9 outside Spain). At year end 72 workers’ legal representatives were identified.

In 2021, the company did not pay significant fines (more than €5,000) for employment reasons.

In 2021, the company approved the Policy on Human Rights included in the Policy Book of ACCIONA Energía

RESPECT FOR HUMAN RIGHTS

The Action Principles and Ethical Conduct of the Code of Conduct set forth that ACCIONA Energía undertakes to respect the human rights internationally acknowledged and that all people who form part of the company perform their professional activities with the same commitment to civil liberties. According to the Policy on Human Rights approved by the Board of Directors, ACCIONA Energía 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 geographic areas where it works. It also pledges to promote the adoption of these principles and values at the companies in which it may have equity holdings, even without a controlling interest, and also among its suppliers, contractors and collaborators.

ACCIONA Energía 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 8 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 UN Global Compact; the Seoul Declaration on Safety and Health at Work; and the UN Guiding Principles on Enterprises and Human Rights.

Human Rights Policy

In 2021, the company approved the Policy on Human Rights included in the Policy Book of ACCIONA Energía, which reflects the commitments and principles of action applicable to all the Group’s companies. These principles of conduct were included to align the daily conduct of the company’s operations with the highest standards and best practices on Human Rights.

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## 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, 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.

### Due Diligence Strategy

The Policy on Human Rights describes the strategy on Social Safeguard due diligence. In 2021, this approach was reinforced to design a preventive, strict and accurate mechanism to enable the company to identify, evaluate, prevent, mitigate, stop, monitor, report, address, rectify and account for real or potential adverse consequences of its activities to human rights. The strategy is composed of 8 key milestones:



### Identification and assessment of real or potential impacts:

To identify and evaluate annually real risks and predict future impacts related to non-exemplary business conduct, the company maintains regular and fluid dialogue with its stakeholders. Last year, 11 social risks that derive from ACCIONA Energía’s activity and its relations with stakeholders were identified, analysed and prioritised:

- > Participating or being complicit, both directly and indirectly, in harassment, discrimination, abuse, severe, degrading or inhuman treatment (such as detentions, arrests, torture, etc.).
- > Violating or being complicit in violating, directly or indirectly, the right to freedom of thought, conscience, religion and opinion.
- > Incurring directly or indirectly in the promotion or use of forced labour or modern slavery for the performance of projects, and/or people trafficking.
- > Incurring directly or indirectly in the promotion of child labour practices.
- > Participating or being complicit, both directly and indirectly, in violating the right to association and collective bargaining.
- > Violating the rights of workers to defend their interests.
- > Not ensuring conditions of health, safety and wellbeing of workers, both employed and subcontracted workers, who carry out their work for ACCIONA Energía.
- > Participating in or benefiting directly or indirectly from unfair, illegal and/or unethical hiring conditions.
- > Undermining fundamental rights to obtain direct or indirect benefit.
- > Using personal data of employees or third parties to the benefit of the organisation or an unauthorised third party.
- > Harming, directly or indirectly, the rights of communities and minorities.

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ACCIONA Energía carried on performing in 2021 the human rights performance analysis in projects, based on the tool developed by the Danish Institute for Human Rights as reference. Furthermore, it carried out an internal analysis process of its performance in this matter focused on the existing gaps and the definition of a road map to advance in its leadership in the sector, promoting continuous improvement and to adapt its processes to the regulations and main international standards in human rights.

On the other hand, as part of the ESG analysis, the Human Rights risk categories in the countries where the company has operations were reviewed and analysed, according to the data of the Maplecroft tool.

Highlighted matters	Principles of the Human Rights Policy	High-risk countries where ACCIONA Energía carries out activities	Installed power in high-risk countries
Workers' fundamental rights and principles	<div>› Fair, dignified and respectful treatment of people</div> <div>› Free work</div> <div>› Commitment to the right to freedom of association, unionisation and collective bargaining and fair defence</div> <div>› People's rights</div>	None	0.0%
Health and safety	<div>› Safe and healthy working conditions</div>	India	1.5%
Working and recruitment conditions	<div>› Ethical, fair and equitable working and recruiting conditions</div>	Egypt, India	3.1%
Right to privacy	<div>› Privacy and communications</div>	Egypt	1.7%
Respect for the communities and land rights	<div>› Respect for the communities in which it operates</div> <div>› Development of skills</div> <div>› Sustainable contribution</div>	India	1.5%

The categories used for this study were, among others: discrimination in employment, freedom of opinion and expression, forced labour, child labour, modern slavery, rights of migrant workers, freedom of association, union freedom and collective bargaining freedom, safety and health at work, fair pay, working hours, right to access basic services, minority rights and indigenous communities.

02

**Integration of the results of the impact assessments in internal processes:**

In 2021, an internal control system for preventing and mitigating the identified risks was developed. Under the supervision of the Board of Directors a procedure and an integrated system for risk assessment and compliance management of social safeguards was deployed for the entire life cycle of the projects, complemented with a social safeguard audit mechanism of all high-risk projects. The Internal Control System for Social Safeguards promotes and consolidates a true culture of compliance and respect of current legislation and reference international rules and principles on human rights.

The Internal Control System for Social Safeguards is composed of more than 70 control activities in defence of the principles that establish what is a responsible business conduct, derived from the risks previously identified. The control measures apply to all the levels of the company. The supervision of the system is done through the ACCIONA-RMS Risk Management application. By means of this tool the professionals identified as being responsible for the control activities must attach valid compliance evidence every year, pursuant to the criteria established by the internal auditor, previously agreed with the different stakeholders affected by the supervision.

ACCIONA Energía carried on performing in 2021 the human rights performance analysis in projects

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03

Mechanisms for reporting and claims:

The Ethics Channel is the instrument made available to all people who form a part of the company, suppliers, customers and partners, to communicate any doubts they might have, to submit queries and to report any irregular behaviour related to human rights matters. The information on the reports received in 2021 for reasons such as discrimination and harassment is included in the section “Ethics and anticorruption” of the chapter “Exponential leadership”.

Furthermore, we are working to increase the channels of communication and reporting in all the projects to include infringements of rights and for the channels to be aligned with the principle 31 of the Guiding Principles on Enterprises and Human Rights.

04

Remediation:

Legitimate and effective mechanisms for remediating the adverse impacts that the company’s activities could cause or could contribute to generate have been designed.

05

Report:

Transparent and true information on the measures taken to address the negative effects of the company’s activities on human rights is given. If serious infringement events are detected these are publicly communicated through the *Sustainability Report* and the *Human Rights Report*.

06

Follow-up of the efficacy of measures and continuous improvement:

The internal processes for preventing and avoiding adverse consequences on the human rights of the stakeholders are reviewed every year.

07

Promotion and training:

In 2021, a specific Human Rights training course run in collaboration with the Spanish Global Compact Network, and available to both employees and the company’s suppliers, was launched again. In 2021, 37 training hours on Human Rights were given to two employees.

08

Supervision and collaboration with the authorities:

If necessary, the company forwards the matter of abuse of human rights to the appropriate judicial authority, with which it collaborates to the necessary extent.

Human rights in the communities

Using its Social Impact Management (SIM) methodology, ACCIONA Energía analyses any possible violations of human rights that may arise among local communities and other stakeholders in connection with a particular project or service.

The severity of any impacts, and whether they cause significant changes in the social, economic or cultural structure of a community or group of employees is also assessed. In those cases in which possible infringements of human rights are identified, the SIM methodology requires prevention and mitigation measures to be established.

The projects in which medium or high human rights risks are detected must establish specific processes and procedures to prevent potential impact. There will also be an undertaking to develop, or cooperate in the design of, remediation mechanisms, including effective reporting channels which are culturally appropriate, accessible (in physical and linguistic terms), transparent and responsible, guarantee confidentiality and offer the appropriate protection against reprisals.

The SIM methodology allows for the understanding and management of the concerns and expectations generated by ACCIONA Energía with its activity, through communication and dialogue with the communities. The company has different communication channels by means of which the stakeholders affected by a project can send their queries, complaints or suggestions.

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In 2021, a risk of possible violation of human rights was found in 2 projects where the SIM methodology was implemented. In both of them, measures were taken to prevent such infringements occurring.

Furthermore, last year, we worked on extending the SIM procedure to align the new requirements contemplated in the Policy on Human Rights and the Internal Control System for Social Safeguards. A thorough analysis of the processes and procedures of the company and the reference national and international rules was carried out to identify possible areas for improvement in the methodology. Thanks to the lessons learnt a road map was devised to reinforce the characterisation of the social safeguard risk; the deployment of the Internal Control System for Social Safeguards at the project level; and the structure of onsite audits in higher-risk projects.

Human rights in the supply chain

Through the supplier portal and the group’s tendering tool, ACCIONA Energía establishes different mechanisms that help prevent the violation of Human Rights throughout its supply chain: Self-Declaration of Responsibility for Suppliers, Ethical Principles for Suppliers, Contractors and Collaborators, Risk Maps, Supplier Registration, Evaluation and Approval Procedures, general contracting clauses, supplier audits and No Go Policies.

It must be highlighted that in 2021 we worked on updating the chapter on Human and Social Rights of the Ethical Principles for Suppliers, Contractors and Collaborators to align them with the commitments undertaken by ACCIONA Energía in the Policy on Human Rights.

Also, as a consequence of having implemented the Internal Control System for Social Safeguards, control activities monitored by the supply chain management were deployed, to guarantee that their instructions, as well as the procedures, rules and policies of diligence in human rights to mitigate the risks with potential or real impact are being complied with. Likewise, the control measures contribute to reinforcing a true culture of compliance.

The Supply Chain department audits the suppliers of direct suppliers whose contracts to supply equipment are for more than €5M, which audits are focused on the suppliers that supply 80% of the contract. Among other issues, the external auditors thoroughly verify the ESG criteria defined by the company that include human rights aspects.

Due diligence in the supply chain in solar technology

The study “In Broad Daylight” by Sheffield Hallam University – Helena Kennedy Centre for International Justice – revealed how the alleged Uyghur Forced Labour in China affected the global industry. The report concluded that the solar industry is particularly vulnerable to forced labour in the Uyghur Region, where labour transfers are deployed within an environment of “unprecedented coercion, undergirded by the constant threat of re-education and internment”. In particular, it is estimated that 95% of solar modules rely on one raw material – solar-grade polysilicon, and polysilicon manufacturers in the Uyghur Region account for approximately 45% of the world’s solar-grade polysilicon supply.

ACCIONA Energía has been working with Chinese suppliers of photovoltaic modules since 2017. Since then, they have been selected in the tenders in which, apart from the price, matters such as their rating in sustainability, the quality of the product, the technical offers presented and the post-sale service are assessed.

Since 2018, the company has audited these suppliers and their respective suppliers and has asked the former to provide a letter in which they undertake to comply with the requirements of our company in ESG, highlighting observance of human rights in their supply chain. All the orders issued in 2021 must not only audit (with Achilles) all those that are *tier II*, but also the suppliers of polysilicon, even if they are *tier III or IV*. In 2021, none of the supplies were from the Xinjiang Region.

Particularly, in the case of the USA, apart from the above, it has been agreed with the supplier that CEA, a body recognised by customs and the government, must carry out an audit. By the end of 2021, the polysilicon for the projects in this country will come from North America. A supplier of Chinese panels asked if this polysilicon could be combined with a supply from China, which may be done provided it undergoes an Achilles ESG audit, the CEA audit, to confirm the entire traceability of the elements that make up the module and the certificate of origin, apart from the technical audit carried out by Enertis.

With this process, ACCIONA Energía may guarantee that the supply chain of its suppliers complies in ESG matters, including the human rights of its workers.

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# PLANET POSITIVE

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# TOWARDS A POSITIVE CONTRIBUTION INVEST TO REGENERATE THE PLANET

ACCIONA Energía’s projects look for a positive impact on the planet, decarbonisation-based business models, conservation of the ecosystems and the circular use of resources.

	Responsible	Resilient	Regenerative	
Climate	Decarbonisation	Zero emissions solutions. Mitigation	Climate positive	Extend recognition as main players in the transition towards a decarbonised economy
Biodiversity	Mitigation hierarchy	Digitization 100% Mapping and evaluation	Positive net impact	Generate a net positive natural capital
Circularity	Zero waste approach and renewable resources	Multiply circular nature of processes	New business models	Ability to develop zero-waste projects
Water	Reduction in use	Efficient models access and sanitation	Increase in people benefitting	Significantly increase the provision of quality water and its sustainable use with high-tech



## KEY MILESTONES 2021

- > Reduction of GHG emissions compared to the base year 2017 by 71% (Scopes 1 and 2) in line with the science-based target, but Scope 3 emissions increased by 6%. Carbon neutrality in its direct operations maintained.
- > 100% CapEx aligned with sustainable activities according to the European taxonomy.
- > Voluntary planting of 74,947 trees.
- > Reduce the use of surface water, groundwater and municipal water in water-stressed areas by 35% compared to 2020.
- > Recovery of 96.5% non-hazardous waste.
- > Approval of a new circular economy policy.



## MAIN CHALLENGES 2022

- > Reduce GHG emissions in line with the SBT target 2030 of 1.5°C reduction and offset GHG emissions in its direct operations.
- > Invest at least 95% of the CapEx in sustainable activities according to the European taxonomy.
- > Voluntary planting of 117,500 trees..
- > Reduce the amount of waste sent to landfill in line with the 2025 target of reducing by half the waste sent to landfill.
- > Increase the percentage of renewable resources in line with the 2025 target to double the consumption of recycled materials.
- > Reduce the use of surface water, groundwater and municipal water in water-stressed areas by 11% compared to 2020.

\*Categories “Products, services and raw materials; Capital goods; Activity related to energy consumption (not Scope 1 or Scope 2), Transport and distribution up waters, Trips of employees to work and Use of products sold by the organisation” representing more than two thirds of the company’s total emissions in Scope 3.



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CLIMATE

A LOW-CARBON BUSINESS STRATEGY

ACCIONA Energía is the largest global energy operator exclusively dedicated to renewable energies, with no ties or legacy related to fossil-fuel technologies.

The company presents a unique company profile, integrated in all the phases of the value chain: development, financing, engineering and construction, *supply chain*, O&M and the marketing of energy. This places the company in a unique position to lead the energy transition process to a decarbonised and electrified economy, based on renewable energy sources.

ACCIONA Energía promotes the adoption of ambitious global targets for decarbonisation of the economy, and its business model takes into account the management of climate change risks and opportunities and communicates them 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).



Greenest electricity company in the world for the seventh consecutive year

ACCIONA Energía has once again confirmed its position as the world’s “greenest” electricity generation company, occupying the New Energy Top 100 Green Utilities ranking since 2015. This ranking is drawn up annually by Energy Intelligence, an independent consultancy firm specialised in energy markets.

The ranking selects one hundred of the largest electricity companies in the world and classifies them according to their CO<sub>2</sub> emissions and their installed capacity in renewable technologies, to determine their degree of involvement in the transition to a low-carbon electricity system.

EUROPEAN TAXONOMY OF ENVIRONMENTALLY SUSTAINABLE ECONOMIC ACTIVITIES

The active involvement of financial markets in financing the sustainable economy is indispensable for the European Union’s plans to move 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, which 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.

The proportion of eligible economic activities according to the taxonomy in ACCIONA Energía in 2021 was:

- > Turnover: 69.09% eligible.
- > OpEx: 96.80% eligible.
- > CapEx: 100% eligible.

The company’s activities identified as eligible under the appendices on mitigation and adaptation were the electricity generation by means of solar photovoltaic, concentration solar, wind, hydroelectric and bioenergy technologies. It also includes installation, maintenance and repair of stations to charge electric vehicles in buildings and professional services related to energy efficiency in buildings.

Although reporting the alignment of ACCIONA Energía’s activities with the taxonomy is not obligatory in 2022, the company has carried out and submitted to verification this analysis, with the following results:

- > Turnover: 99.53% alignment.
- > OpEx: 99.50% alignment.
- > CapEx: 100% alignment.



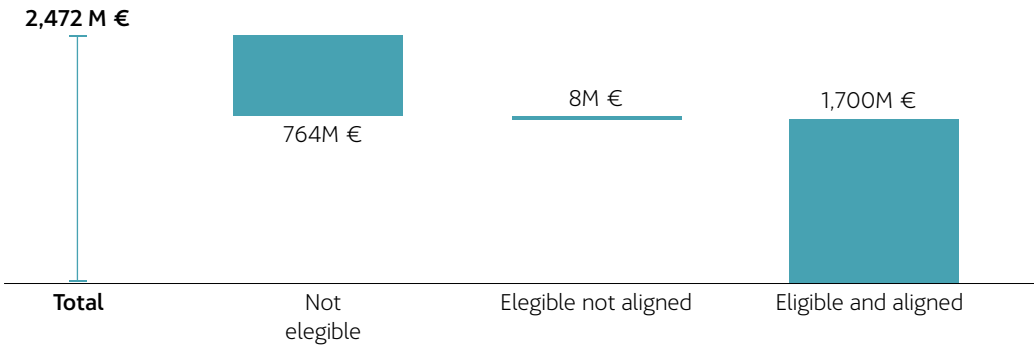
**More information.** The methodology for the estimate and breakdown of data according to Annex II of Commission Delegated Regulation (EU) 2021/2178, of 6 July 2021, is contained in the “Annex of itemised indicators”.

The following graphs schematically show the results of eligibility and alignment of ACCIONA Energía’s activities with the taxonomy. The absolute OpEx and CapEx values presented below are based on specific definitions observed under Annex I: Delegated Regulation (EU) 2021/2178 therefore, they might differ from those presented under the heading of the company’s financial statements.

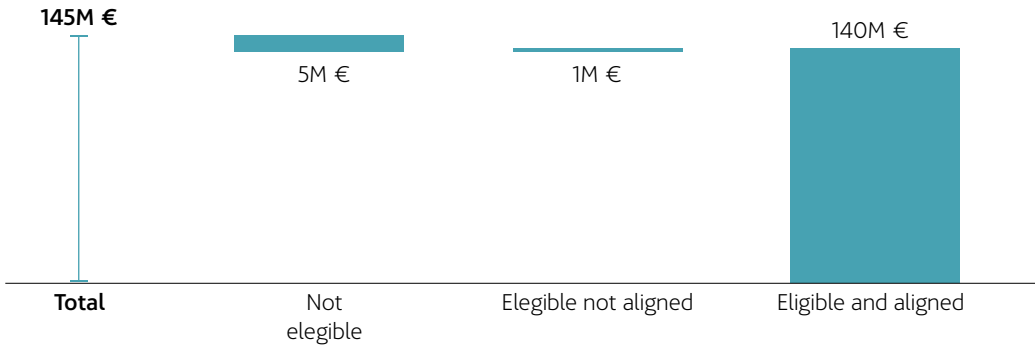
< Climate	45	> Biodiversity	57
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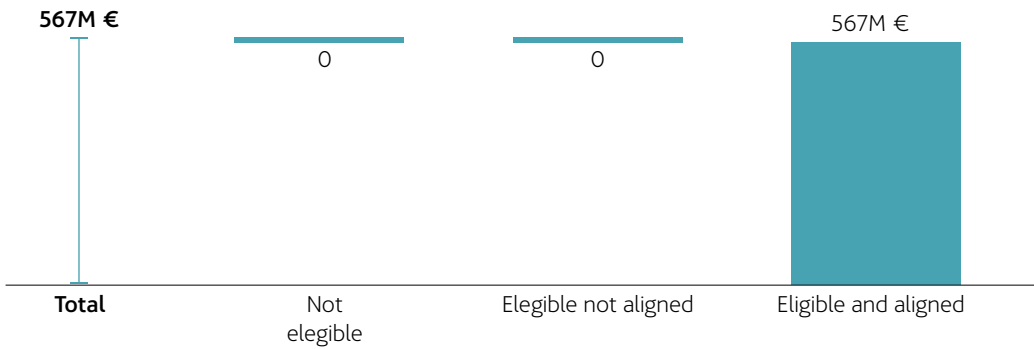
Turnover aligned with the European taxonomy



OpEx aligned with the European taxonomy



CapEx aligned with the European taxonomy



GOVERNANCE AND STRATEGY IN LINE WITH GLOBAL ECONOMIC DECARBONISATION TARGETS

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

In terms of climate change governance, the body responsible is the Board of Directors' Audit and Sustainability Committee, which has been performing the following functions, amongst others: identify and guide the group's climate change policies, objectives, best practices and programmes; evaluate, monitor and review the plans for implementing these strategies drawn up by group executives; periodically review internal control and management systems and the degree of compliance with these policies; and report to the Board of Directors on climate change policies, objectives and programmes, and the corresponding budgets for their implementation.

ACCIONA Energía's climate change strategy, approved by the Board of Directors, has set forth as a priority to lead the transition towards low-carbon business models. This climate agenda is embodied in the objectives of the Sustainability Master Plan of ACCIONA Energía (SMP), in whose initiatives and commitments are managed by the Finance and Sustainability Department, directly reporting to the Audit and Sustainability Committee. The climate change targets and principles as articulated in the 2025 SMP are as follows:

- > Align the investment strategy to activities of mitigation and adaptation to climate change so that 95% of the CapEx is classified as taxonomic in relation to these two environmental targets.
- > Reduce its own emissions and those of the supply chain in the period from 2017 to 2030, in line with the needs established by science to keep the increase in global temperature below 1.5°C (60% reduction in Scope 1 and Scope 2 emissions, and 47% reduction in Scope 3 emissions)<sup>3</sup>. These are targets approved by the Science Based Targets initiative.

3. See section on Scope 3 emissions.

◀ Climate	45	› Biodiversity	57
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Progress on climate action

In 2021, ACCIONA Energía met its emissions reduction targets, reducing Scope 1 and 2 by 71% compared to 2017, but increased Scope 3 emissions by 6%. The company has continued to evaluate and manage its climate change risks by monitoring and consolidating the climate adaptation plans of its businesses.

Use of the internal carbon price

The company subscribes to the petition of the Carbon Pricing Leadership Coalition (CPLC), a group comprising political leaders, companies, civil society and academics, for stable, long-term carbon pricing policies. Charging the price of carbon to operating costs is a very effective measure in the fight against the climate emergency.

The company has a *Guide to the use of internal carbon pricing* which explains which uses of carbon pricing are favourable to the company's activities, each with its own objectives, Scope and price levels:

- > Decarbonisation price: this price, €7/t CO<sub>2</sub>e in 2021, applies effectively to all the areas of the company, which are required to pay according to the GHG emissions they generate. A part of the amount raised is used to offset the emissions generated (Scopes 1+2), while the rest is set aside for the decarbonisation fund, which aims to provide incentives for investment in measures to reduce the carbon footprint.
- > Shadow price: this price, €39.5/t CO<sub>2</sub>e in 2021, is based on the estimated cost of the external effect of the company's greenhouse gas emissions. It is used in certain bidding for medium and long-term projects as an additional element in the risk analysis of the tender, which contributes to anticipating the resilience of the project to regulatory scenarios arising from compliance with the Paris Agreement.

Furthermore, the company incorporated two procedures in the assessment of new investments:

- > Procedure for the estimate of carbon costs in new investments.
- > Adjustment of carbon prices.

In 2021, ACCIONA Energía met its emissions reduction targets, reducing Scope 1 and 2 by 71% compared to 2017

Decarbonisation fund

Since 2016, the company has had a fund for which the budget arises from charging the internal price of carbon to each of its activities. This fund is used to acquire carbon credit to offset the emissions generated from its direct activity and since 2020 it has also been used to finance projects to reduce the carbon footprint.

Financing for decarbonisation activities through the fund is awarded by means of an internal bidding mechanism, a selection committee decides which initiatives are priority according to their impact and return, and finally a committee comprising members of senior management is responsible for allocating funds to the most interesting projects.

In 2021, 4 initiatives in ACCIONA Energía plus two other initiatives shared with ACCIONA were financed by the decarbonisation fund, which potential to reduce emissions amounts to 7,750 tCO<sub>2</sub>e and which development is extended for more than a year. Among them, the following are worthy of note:

- > Project to reduce CH<sub>4</sub> and N<sub>2</sub>O emissions in electricity plants by means of biomass combustion through continuously monitoring the levels of combustion and the adjustment of associated parameters, achieving a 70% reduction emissions in these plants.
- > Pilot transformation cell facility without SF<sub>6</sub>, which will materialise in the SF<sub>6</sub>-free cell facility in a project in Spain in 2022.
- > Analysis of the feasibility of self-consumption facilities, accumulation batteries and other efficiency measures in the 10 facilities with most emissions of the company.
- > Redesign of prefabricated buildings for new photovoltaic and wind energy developments for them to be zero-emission.

MANAGING THE RISKS OF CLIMATE CHANGE

Management of climate risks at ACCIONA Energía are carried out through the application of a specific corporate procedure, which identifies, evaluates, prioritises and communicates to the company's decision-making bodies the risks associated with climate change that might affect the company and its centres. This process results in the establishment of policies for action and tolerance thresholds that provide a reasonable guarantee that objectives will be met, both in the short term (one year), the medium term (the five years in which each Sustainability Master Plan is in force) and the long term (10 years, in accordance with observations of mega-trends and already established targets, such as the SBTs).

A number of tools are used to identify climate risks and opportunities, notable among which is the company's digital climate change model that monitors, for all ACCIONA Energía's centres, the historic and projected climate variables under different temperature increase scenarios and

1	Letter from the Chairman
2	Only in renewables
3	Degree of fulfilment of commitments
4	People centric
5	Planet positive
6	Exponential leadership
7	Integrate to transform
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with different timelines provided for in the latest IPCC reports. This instrument also oversees the production, financial, emissions generation and energy consumption variables. It also includes references to the climate policies and the carbon markets in each region, thereby constituting an essential source of information when it comes to anticipating situations, particularly those related to medium-long term physical events and short-medium term transitions. Specifically, in order to provide medium-long term transition scenarios, the identification of activities within the European taxonomy is a necessary reference point. In addition, during the identification process other tools are used that are not yet integrated in the digital model, such as those devoted to the identification of legal requirements; also indispensable in this regard is the experience of the members of the groups evaluating the scenarios.

Risk management is an annual process that begins with the configuration of groups of experts at the level of each department. Using the tool mentioned above, the experts propose a battery of risk scenarios for each ACCIONA location, group of locations and/or line of business (or its value chain), taking geographical exposure and vulnerability into account.

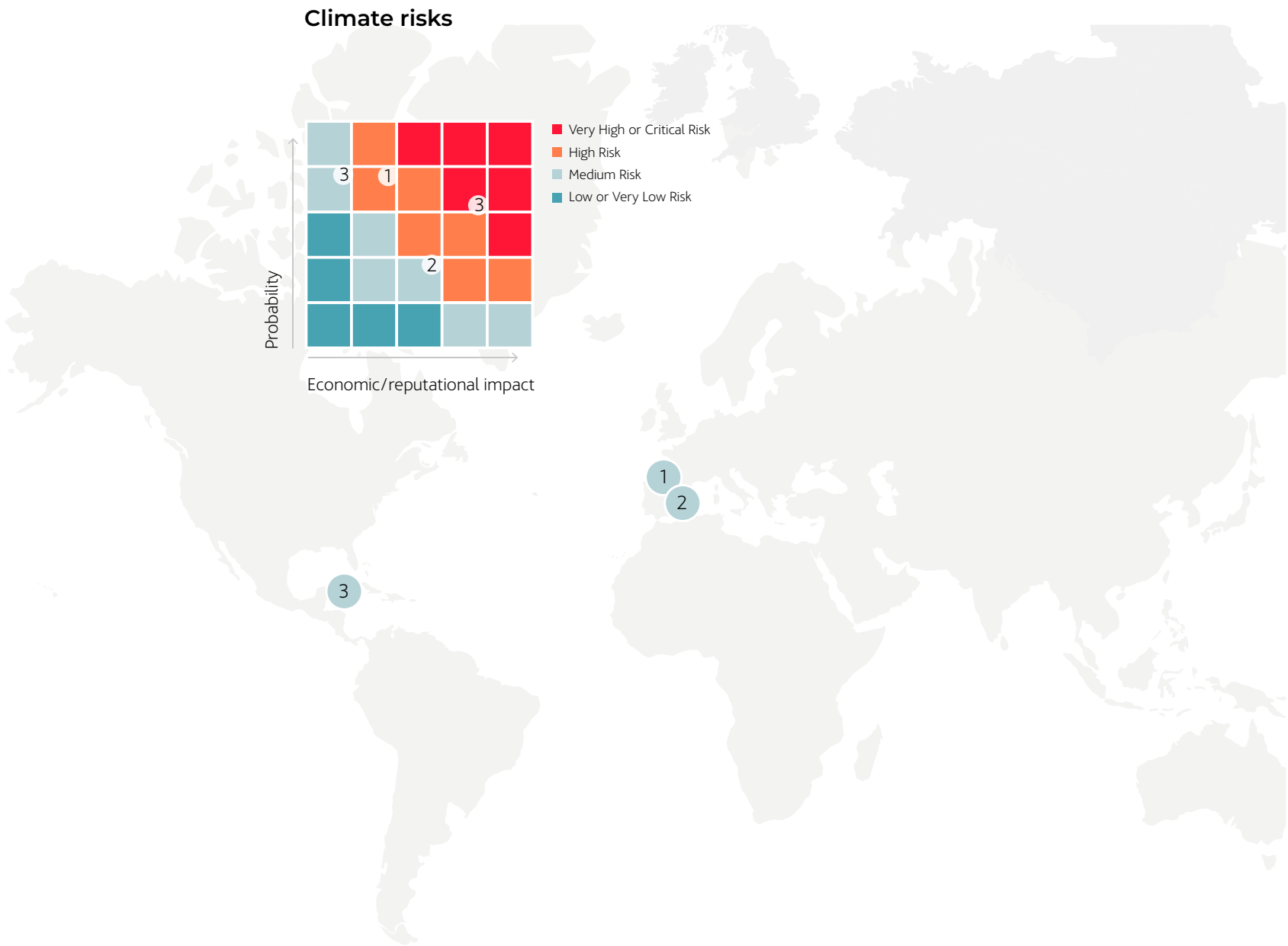
The climate scenarios most commonly used to identify risk cases are those that foresee a limited temperature increase of 1.5°C to 2°C in the case of transition risk scenarios, and an increase of at least 3°C in the case of physical risk scenarios (RCP 6 and RCP 8.5).

Once identified, each risk scenario is evaluated in terms of the probability of it occurring and the economic and reputational consequences. These variables are then used to determine the risk level of each of the scenarios considered (see chart with the climate risks highlighted). For those with a greater risk of occurring, each assessment group prepares specific reports informing the company’s decision-making bodies about mitigation options and the estimated costs associated with them.

At the final stage, the climate risk scenarios are integrated into ACCIONA Energía’s general risk management process, which is overseen by the Board of Directors (which the Audit and Sustainability Committee is the body ultimately responsible for climate change in the company), the Finance and Sustainability Committee and the Management Committee.

Key climate risks and opportunities

Shown below is an evaluation of the most significant climate risk and opportunity scenarios for ACCIONA Energía in 2021, together with their potential impact and timeline, geographical Scope, business lines affected and the actions taken to manage them. Generally speaking, it can be affirmed that ACCIONA Energía’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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No. Category	Description	Type of impact	Risk management and mitigation
1 Physical	Lower hydraulic generation in Spain due to reduced run-off. Change in seasonability. A high risk is identified in the long term	Decreased revenue (low)	Processes for monitoring and controlling changes in the production and management of reservoirs are being implemented with weather forecasting to enable better planning and management of the reservoirs. The electricity sales team has adjusted its procedures to the changes in temporary variability.
2 Physical	Reduction of the production derived from the decrease in wind resource in Spain. A medium risk is identified in the long term.	Decreased revenue (medium)	The capacity to manage risk is limited but a policy of geographical and technological diversification of installed capacity has been implemented to mitigate the risk.
3 Physical	Increase of stoppages in wind farms derived from the increase in number and intensity of hurricanes and flooding in the Gulf of Mexico. A medium risk is identified in the medium term.	Increased costs (very low)	Foundations are being elevated and insurance has been taken out against risks resulting from catastrophic events.

## Adaptation to climate change: predictive maintenance of photovoltaic panels

The variation in wind patterns and rise in sea temperature as a consequence of climate change may vary the dispersion and accumulation of particulate matter and marine aerosol. The deposit of these materials in photovoltaic panels reduces their production.

ACCIONA Energía has already adapted to such conditions, carrying out a continuous analysis of the cost-benefit to optimise the cleaning frequency of the photovoltaic panels. For this purpose, it follows up pairs of calibrated modules located at different points of the same plant. In each pair one is cleaned every week and other one is not, measuring the decrease of production per pairs of modules. With this information, production forecasts are carried out and the optimal moment for the general cleaning of the modules may be detected.

This follow-up has already been implemented in the Sishen photovoltaic plants (South Africa), El Romero (Chile) and Puerto Libertad (Mexico).



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Key climate opportunities

Category	Description	Type of impact	Opportunity management
Products and services	Increase in the demand for renewable generation infrastructures due to regulatory changes in climate change. The regulatory development of the European Union Green Deal is a palpable example of this type of opportunities in the short, medium and long term.	Increased revenue (very high)	Commitment to an investment of at least €7,800M in installed capacity from renewable energies in 2021-2025, when ACCIONA Energía intends to operate more than 20 GW (10 new GW) of renewable energy. The new installed MW will mean an increase of income and this strategy will carry on growing further than 2025, with a target of installed capacity >30 GW in 2030.
Products and services	Increase in the demand for renewable generation infrastructures due to regulatory changes in climate change. The regulatory development of the European Union Green Deal is a palpable example of this type of opportunities in the short, medium and long term.	Access to financing (high)	100% of the funds from the Euro Medium Term Notes (EMTN) debt programme for ACCIONA Energía were green in 2021, which proves the relevance and competitive advantage of this type of financing for the company.

KEY CLIMATE METRICS AND INDICATORS

Emissions generated

The emissions generated are calculated according to the criteria defined in the GHG Protocol, under the financial control scheme, consolidating as CO<sub>2</sub> equivalent emissions corresponding to all the GHGs that are important for the company: CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFC and SF<sub>6</sub>. The criterion for the consolidation of energy consumption and other emissions follows the same accounting criterion.

The conversion factors used are those indicated by:

- > 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's Green Energy business line.
- > The UK Department for Environment, Food and Rural Affairs.
- > The European Environment Agency.

Scope 1 and Scope 2 emissions

In 2021, the company's target, in line with the science-based target for 2030, was to reduce its Scope 1 and Scope 2 GHG emissions by 18.46% compared to the base year 2017. It has managed to reduce them by 71%.

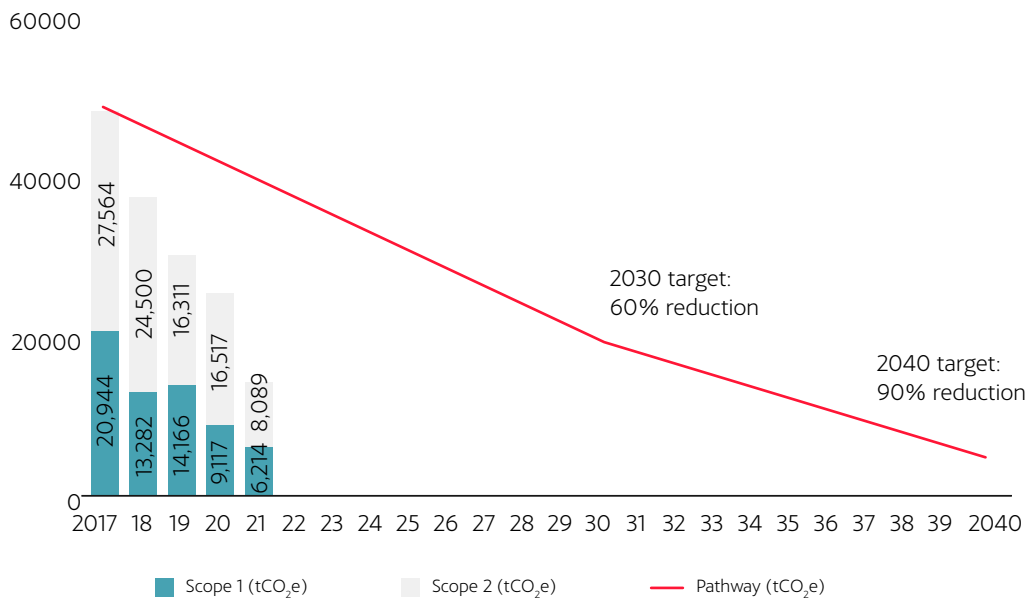
The sum of Scope 1 and Scope 2 CO<sub>2</sub>e emissions generated in 2021 was 14,303 tonnes, of which 6,214 tCO<sub>2</sub>e were Scope 1, and 8,089 tCO<sub>2</sub>e were Scope 2 *market-based* (32,748 tCO<sub>2</sub>e Scope 2 *location-based*).

ACCIONA Energía's carbon intensity value was 5.79 tCO<sub>2</sub>e /million euros of sales (Scopes 1 and 2).

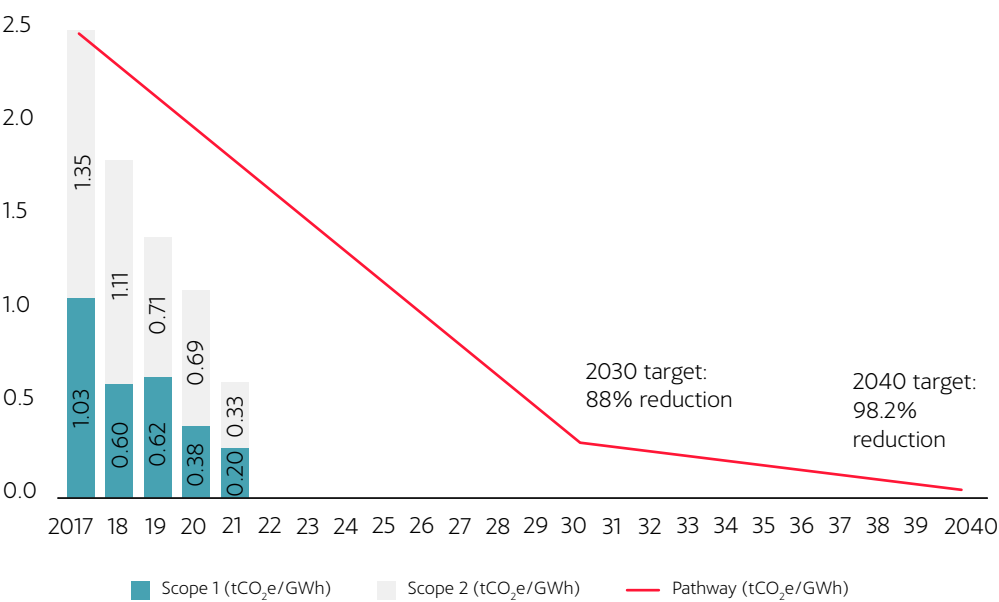


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Evolution of generated emissions and net zero target (tCO<sub>2</sub>e)

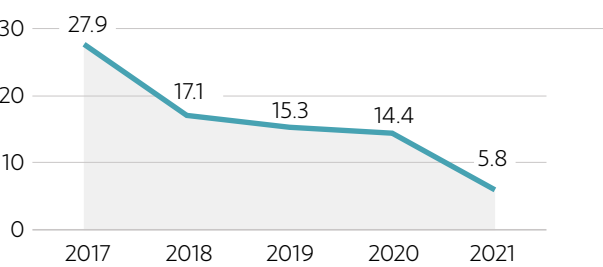


Evolution of generated emissions and net zero target (tCO<sub>2</sub>e/MWh) in intensive terms



The fall in GHG emissions was due to an increase in the use of electricity to the detriment of fossil fuels in some centres. The implementation of energy efficiency measures, such as adjustment of combustion parameters in biomass plants, has also been very important, which has reduced CH<sub>4</sub> and N<sub>2</sub>O emissions by more than 1,832 tCO<sub>2</sub>e. Finally, the acquisition of electricity from certified renewable sources and i-RECs<sup>4</sup> (6,392 of which, equivalent to 4,137 tCO<sub>2</sub>e, were acquired at the corporate level) had an influence.

Intensity of GHG emissions (tCO<sub>2</sub>/sales)



In 2021, biogenic emissions generated totalled 466,788 tCO<sub>2</sub>.

Scope 3 emissions

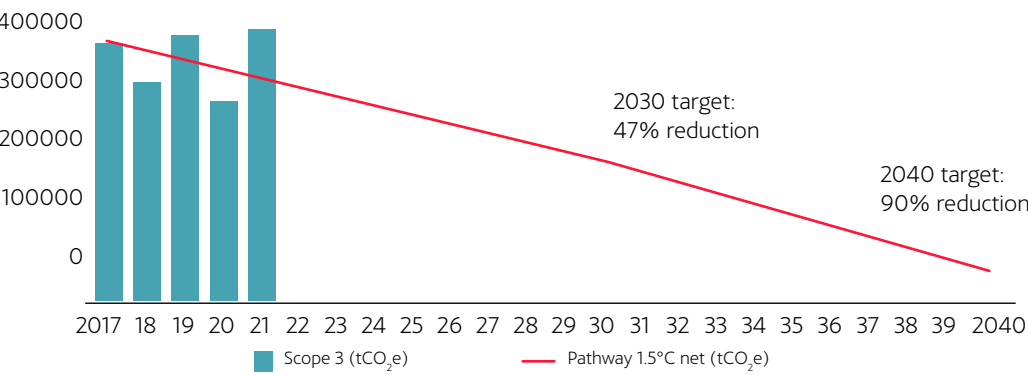
The strategy of ACCIONA Energía is in line with that of ACCIONA, which, for 2021, set a science-based target to reduce Scope 3 GHG emissions by 14.46% compared to base year 2017 for the set of categories “Products, services and raw materials; Capital goods; Activity related to energy use (non-Scope 1 and non-Scope 2) and Upstream transport and distribution, employee commuting and use of products sold by the organisation”. Scope 3 emissions figures for these 6 categories went up by 6% compared to 2017 (2017 data: 371,555 tCO<sub>2</sub>e) and Scope 3 total emissions increased to an equal extent.

In 2021, 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/CO<sub>2</sub> variables) in the supplier risk map<sup>5</sup> and sustainability training courses available to suppliers. However, these measures could not offset the greater purchasing activity effect motivated by the company’s strategic plan focused on increasing the amount of 100% renewable power installed.

4. An i-REC is an international renewable energy certificate for 1 MWh of energy. Unlike a guarantee of origin, it is transferable from one country to another. It is accredited by the International REC Standard Foundation and is recognized by the GHG Protocol.  
5. More information in the chapter Exponential Leadership-Supply chain

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Absolute target of Scope 3 reduction in the net zero commitment 2040



Scope 3 emissions in relevant categories for ACCIONA Energía (tCO<sub>2</sub>e)

Category	2017	2018	2019	2020	2021
Purchased goods and services	81,322	96,402	159,752	71,777	169,391
Capital goods	218,507	172,676	186,670	181,550	211,200
Energy-related activities (not Scope 1 or Scope 2)	29,549	17,060	16,516	18,350	1,269
Upstream transport and distribution	39,356	27,040	17,437	10,027	10,034
Waste generated in operations	0	0	0	1	0
Business travels	0	0	0	0	0
Employee commuting	2,821	2,788	2,840	2,701	3,033
Upstream leased assets	0	349	637	2,518	0
Use of sold products	0	0	0	0	0
End-of-life treatment of sold products	0	0	0	0	0
Investments	1,181	1,011	1,793	1,075	552
Total (tCO <sub>2</sub> e)	372,736	317,326	385,645	287,999	395,479

The headings “Downstream transport and distribution”, “Processing of sold products”, “Assets leased by the organisation”, “Use of products sold by the organisation” and “Franchises” are considered irrelevant for ACCIONA Energía 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 emissions for “Business travels” are consolidated at the ACCIONA group level.

Emissions avoided

At the end of 2021, ACCIONA Energía had 11,245 MW of renewable capacity installed, having generated 24,541 GWh. This renewable production avoided<sup>6</sup> the emission into the atmosphere of 13.4 million tonnes of CO<sub>2</sub>e, 11,209 tNOx, 32,377 tSOx and 264 tPM<sub>10</sub>.

Emissions avoided per country by generating renewable electricity

Countries	Installed capacity (MW)	Production (GWh)	Emissions avoided (tCO <sub>2</sub> e)
Australia	592	1,149	974,758
Canada	181	476	324,990
Chile	922	2,085	1,803,145
Costa Rica	50	254	180,107
Croatia	30	81	37,670
United States	1,126	1,970	1,134,199
Egypt	186	436	242,282
Spain	5,736	12,218	5,373,298
Hungary	24	42	23,675
India	164	371	348,319
Italy	156	253	112,802
Mexico	1,480	4,008	1,845,501
Poland	101	204	157,957
Portugal	165	376	160,684
South Africa	232	523	547,071
Ukraine	100	95	92,287
Total	11,245	24,541	13,358,745

6. These emissions correspond to those that would have occurred if ACCIONA Energía’s electricity production in each country had been generated using its fossil electricity mix.

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Own energy consumption

In 2021 ACCIONA Energía consumed 5,123 TJ of energy, 97% of which came from renewable sources.

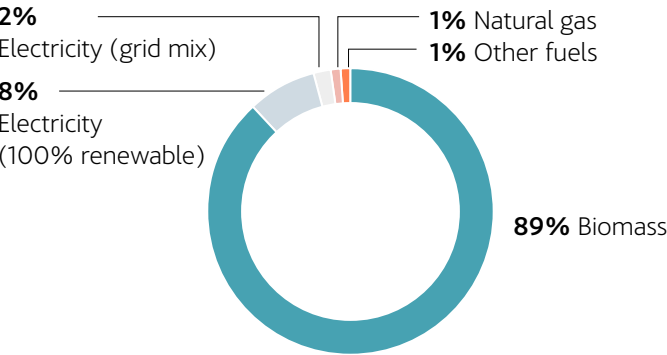
This means that the company's fossil-fuel energy intensity stood at 0.06 TJ/million euros sales, while energy intensity from renewable sources was 2.01 TJ/million euros in sales.

The company has also established a target for reducing non-renewable energy consumption in line with its science-based GHG emission reduction objective (18.46% compared to the 2017 figure, consolidated under the same criteria as in 2019). This was attained with ease as non-renewable energy consumption decreased by 66% compared to base year 2017, being 71% reduction of GHG emissions compared to 2017.

Energy consumption (TJ)

	2017	2018	2019	2020	2021
Renewable	4,556	4,532	4,449	4,795	4,974
Fuel	4,283	4,393	4,246	4,499	4,577
Electricity	273	139	203	296	397
Non-renewable	436	283	238	227	149
Fuel	184	58	84	72	63
Electricity	252	225	154	156	86
Total (TJ)	4,992	4,815	4,687	5,023	5,123

Energy consumption by source



Third-party energy consumption

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

In 2021, ACCIONA Energía had a Scope 3 energy reduction target in line with its science-based GHG emission reduction target.

External energy consumption (GJ)

Category	2018	2019	2020	2021
Purchased goods and services	1,404,474	1,976,086	1,045,102	2,233,183
Capital goods	2,053,879	2,150,584	2,344,173	2,851,537
Energy-related activities (not Scope 1 or Scope 2)	388,598	374,478	416,077	17,453
Upstream transport and distribution	323,719	212,996	126,532	124,051
Waste generated in operations	-	-	13	4
Business travels	0	0	0	0
Employee commuting	38,382	39,272	38,236	42,944
Upstream leased assets	2,742	5,215	29,171	0
Use of sold products	0	0	0	0
End-of-life treatment of sold products	0	0	0	0
Investments	23,348	28,008	32,570	33,082
Total (GJ)	4,235,142	4,786,639	4,031,874	5,302,254

The items "Downstream transport and distribution", "Processing of sold products", "Assets leased assets by the organisation" and "Franchises" are considered irrelevant for ACCIONA Energía 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 consumptions for "Business travels" are consolidated at the ACCIONA group level.

In 2021 ACCIONA Energía consumed 5,123 TJ of energy, 97% of which came from renewable sources

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WATER

ACCIONA Energía relies on a specific water policy approved by ACCIONA Energía’s Board of Directors’ Audit and Sustainability Committee, the main objective of which is to support the fundamental human right of access to drinking water and sanitation.

The company recognises that water is a finite and irreplaceable natural resource, and so its water management strategy takes into account the availability and quality of this natural resource and the equilibrium of the ecosystems where it is found.

ACCIONA Energía’s water agenda is determined by strict compliance with the law, responsible and efficient management, the establishment of specific objectives through the Sustainability Master Plan, the development of new technologies, the integration of water into risk management, the extension of its principles to the value chain and transparent communication.

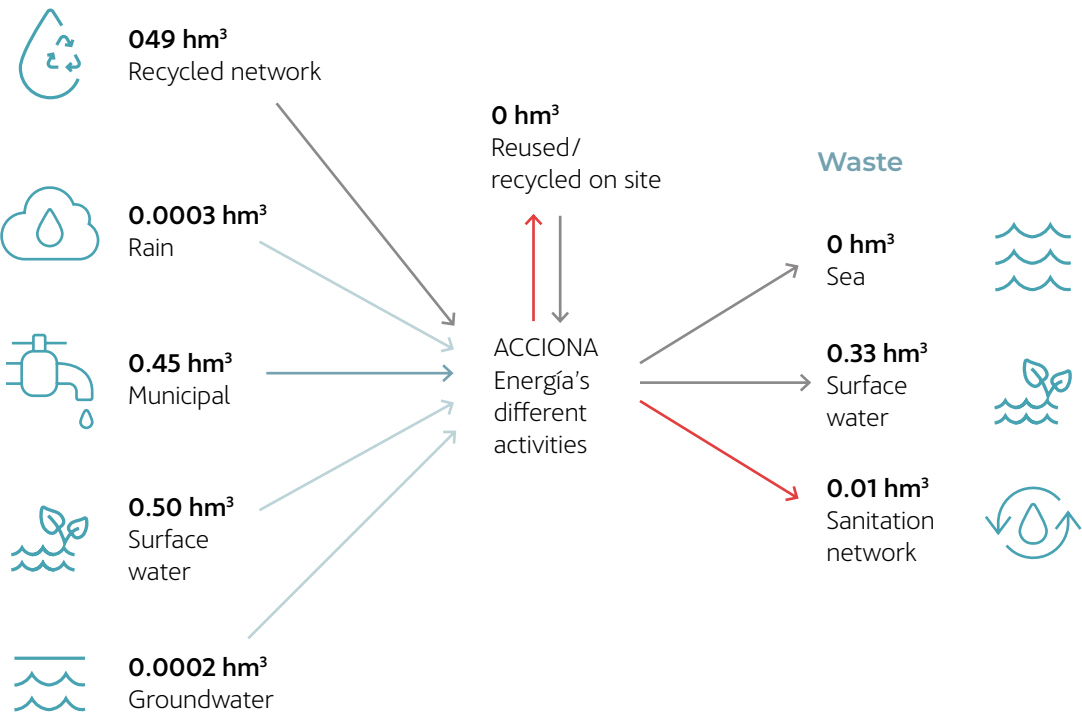
ACCIONA ENERGÍA’S USE OF WATER

The company carries out 2 different ways in which it uses water in its operations:

- › **Water for internal consumption:** this is water used by the company at its own facilities. This use includes *freshwater* type water collection such as municipal, surface and underground. ACCIONA Energía adheres to the target of ACCIONA to reduce these types of water use. It also includes the use of water from sources that do not deplete available natural reserves, such as rainwater, recycled mains water and water reused or recycled on site (in 2021, 33.9% of ACCIONA Energía’s total water for internal consumption came from one of these three sources).
- › **Discharge:** this refers to the residual water from ACCIONA Energía’s internal consumption that has not evaporated or been used in any company asset 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.

The company and the Public Administrations responsible for the environment implement prevention measures to minimise possible impacts on species that might be found in river ecosystems and other bodies of water, as well as rules for respecting the environmental flow system and the technical requirements set by the administration itself. The processes that guarantee compliance with the requirements for water collection and discharge are part of the environmental management systems implemented, verified and certified by the company according to the ISO 14001 international standard.

Water usage in 2021



The volume of consumed water and discharges remained very stable for some years.

ACCIONA Energía also calculates the water consumption (surface and groundwater) associated with its suppliers, resulting in just over 1.7 hm³ for its direct suppliers and 10.4 hm³ for its entire supply chain.

In relation to water-stressed countries, the company set itself the objective to reduce the consumption of surface water, groundwater and municipal water by 10% compared to 2020. These consumptions decreased by 35%.

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## Optimisation in the use of water in biomass generation facilities

ACCIONA Energía operates 3 renewable generation plants by biomass combustion from agricultural and/or forest waste which joint power amounts to 61 MW. The operation of this kind of plants requires important amounts of refrigerated water.

To minimise the impact in the water resource the company's plants rely on several strategies. Thus:

- > The Sangüensa plant uses open-cycle irrigation channel water, so, once the process is refrigerated it is returned to the same channel and is available for the irrigation community, without loss of flow.
- > The Briviesca plant uses water from a treatment plant nearby, so all the water used is from a recycled source.
- > In all the cases, and after being used mainly to evacuate the heat excess from the plants, it is returned to the environment in compatible conditions, without adding toxic substances, and respecting the physical and chemical parameters imposed by the competent administrations.

## CIRCULAR ECONOMY

Since 2021, ACCIONA Energía relies on a circular economy policy, with the goal of no contributions of virgin materials or fossil energy, no waste generation and the regeneration of the environment during project development.

ACCIONA Energía is a pioneering company in the transition to a circular economy that generates renewable energy only from inexhaustible resources such as the sun and the wind, and from agricultural and/or forest waste. It also optimises the circularity of its processes in the following way:

- > It uses life cycle analysis tools for 100% of its projects (4 LCAs carried out in 2021), allowing it to assess and reduce the impact of its developments, and also its consumption of material and energy resources.
- > It minimises its fossil fuel energy use.
- > It rationalises its water use and makes use of alternative water sources that do not exhaust the existing resources.
- > It provides a second life to the waste and subproducts derived from its processes.
- > It maximises the use of materials and uses sustainable materials that reduce to a minimum the amount of components used.
- > It carries out intensive R+D+i work in all areas of its activity, improving the efficiency of its processes and the performance of the resources used.
- > It works closely with its stakeholders in training and awareness-raising on the circular economy.

ACCIONA Energía is a pioneering company in the transition to a circular economy that generates renewable energy only from inexhaustible resources

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RESOURCES AND WASTE MANAGEMENT IN LINE WITH THE CIRCULAR ECONOMY

Within the framework of the SMP 2025, ACCIONA Energía has resolved to increase its efforts in the area of the circular economy, and to halve the amount of non-recovered waste generated in 2020, and double the percentage of renewable/recycled resources used by the company. In 2021 this commitment translated into:

- > A 10% reduction in hazardous and non-hazardous, non-recovered waste generated in 2020.
- > Use of at least 12% resources from recycled/renewable sources.

Waste generation and management

	2018	2019	2020	2021
	↓	↓	↓	↓
Non-hazardous waste (tonnes)	36,044	31,643	34,542	36,004
Non-hazardous waste to landfill (tonnes)	8,265	3,474	2,335	1,188
% of non-hazardous waste to landfill	23%	11%	7%	3%
Non-hazardous waste recovered (tonnes)	27,779	28,169	32,207	34,815
% Non-hazardous waste recovered	77%	89%	93%	97%
Hazardous waste (tonnes)	7,115	835	746	634
Hazardous waste to landfill (tonnes)	-	-	164	86
% of hazardous waste to landfill	-	-	22%	14%
Hazardous waste recovered (tonnes)	-	-	582	548
% Hazardous waste recovered	-	-	78%	86%

Use of resources

	2018	2019	2020	2021
	↓	↓	↓	↓
Total resources (tonnes)	373	310	248,368	225,268
Recycled or renewable resources (tonnes)	-	-	21,840	19,284
Recycled or renewable resources (%)	-	-	8.8%	8.6%

In 2021 the company's waste generation was stable, reducing the amount of hazardous waste and carrying on decreasing the percentage of waste to landfill. 36,004 tonnes of non-hazardous waste were generated, of which 1,188 were sent to landfill (49% less than the previous year, thus achieving the company's target) and 34,816 were recovered (reuse, recycling or other means). The latter figure constitutes 97% of the total non-hazardous waste generation. The reuse of 30,078 tonnes of slags and 2,649 tonnes of ashes must be highlighted, representing 100% legally recoverable slags and ashes generated in biomass plants.

In 2021, 225,268 tonnes of resources were consumed. This figure came down compared to the previous year, mainly because of a decrease in the building activity compared to the previous year. The 2020 data were re-expressed owing to the criteria change in recording the resources in the construction of facilities. They were all previously recorded upon completion of the work, but consumption is now estimated each year during the execution of the work.

Recovery of 96.5% generated waste

Waste management in ACCIONA Energía is a paradigmatic case in which 96.5% of generated waste is recovered. Thanks to ambitious R&D programmes, ACCIONA Energía manages to reduce the impact of the waste of other industries, replacing natural raw materials with waste. This doubly regenerative character prevents the extraction of raw materials and helps to reduce the carbon footprint of diverse industries (mining, cement manufacture, construction or production of fertilisers).

Projects to recover biomass slags, which make most of the waste of ACCIONA Energía, must be highlighted. This waste is 100% recovered with the following environmental benefits:

- > Reducing carbon footprint of cement plants, thanks to the use of organic material, replacing quarry materials.
- > Reducing the environmental impact of construction, by supplying recycled aggregates, from waste.
- > Reducing the environmental impact of the industry of fertilisers, providing organic potassium.

In addition, in 2021 ACCIONA Energía launched unique R&D projects, mentioning the recycling of wind turbine blades to manufacture building materials.





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First renewable storage plant with recycled batteries in Spain

In 2021, ACCIONA Energía connected the first renewable storage plant with recycled batteries in Spain, in its experimental photovoltaic plant in Tudela (Navarre) to the grid.

The plant includes 32 kW/32 kWh batteries from vehicles, which use in the project will double their useful life.

Vehicle battery standards require battery systems to remain at over 80% of their operational capacity and only permit a maximum discharge of 5% over 24 hours to ensure maximum vehicle performance.

The project represents an additional focus on decarbonization, due to the fact that recycling electric vehicle batteries avoids up to 70% of the CO<sub>2</sub> emissions associated with the manufacture of new batteries. It also boosts the circular economy model and the recovery of resources, given the scarcity of many of the basic components of lithiumion batteries, such as cobalt or lithium itself.

BIODIVERSITY

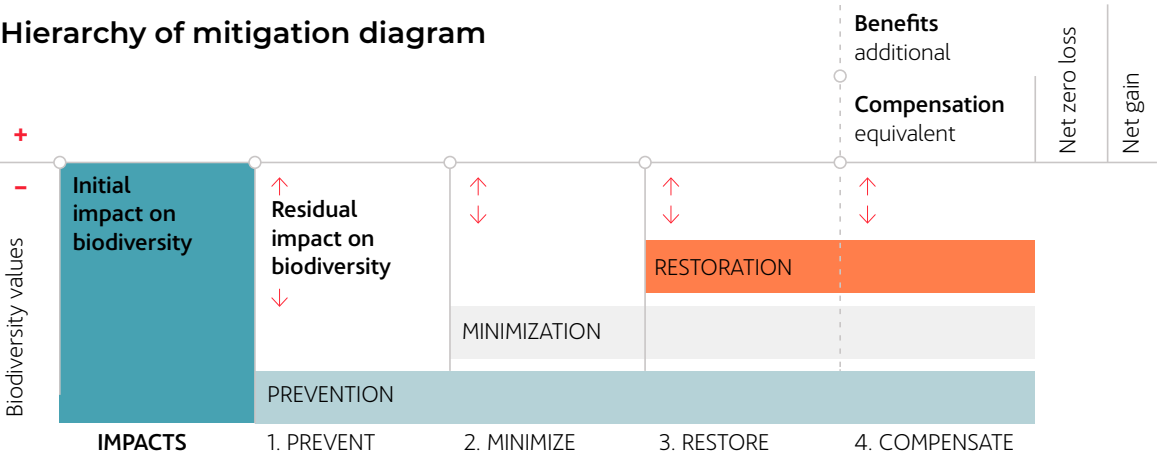
For the company, biodiversity conservation and the responsible use of natural heritage are not only an ethical commitment but also a necessary condition for global sustainability. ACCIONA Energía has a specific biodiversity policy which uses a variety of principles to promote the valuation for and conservation of animal and plant species as a necessity for economic development and social progress.

In its new 2025 Sustainability Master Plan, the company has included a strategic line on biodiversity, with the aim of both applying the hierarchy of mitigation of impacts in all its projects and setting targets that can entail a positive material result for the environment and biodiversity through natural science-based solutions.

Hierarchy of mitigation in biodiversity

ACCIONA Energía gives priority to the hierarchy strategy of mitigating impacts on biodiversity, identifying and preventing potential impacts that might occur, minimising those that cannot be avoided, taking restoration actions and, finally, proposing offset actions to achieve a Net Positive Impact. The company develops environmental surveillance plans to control and monitor the measures implemented.

Hierarchy of mitigation diagram



BIODIVERSITY PERFORMANCE INDICATORS

Location with respect to the protected areas

Location with respect to the protected area	Surface (ha)
Internal	2,292
Partially internal	240

› Climate	45	‹ Biodiversity	57
› Water	54	› Integrated environmental management	60
› Circular economy	55		

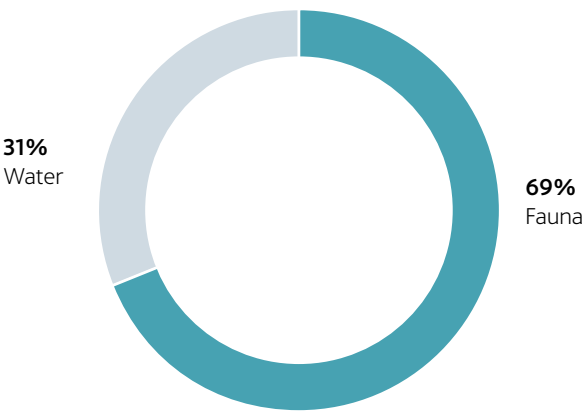
Identification and assessment of the most significant impacts

ACCIONA Energía identifies and assesses the most significant impacts of its facilities located in protected and non-protected areas that are of great value for biodiversity.

In 2021, the most significant impacts were seen in the fauna (69%) and water environment (31%).

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.

Most significant environmental impacts by area



Protected species

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

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 included on this list but are protected by national catalogues.

Protected species affected by facilities

IUCN Red List Protection Category		No. of species
CR	Critically endangered	0
EN	Endangered	0
VU	Vulnerable	4
NT	Near threatened	1
LC	Least concern	93
Other national catalogues		49
TOTAL		147

HABITAT RESTORATION AND PROTECTION

ACCIONA Energía’s projects consider the protection and restoration of those areas that could be affected by its facilities. As such, these projects involve work to protect and restore habitats, such as replanting, forest restoration and planting of affected areas.

Throughout 2021, the company has protected and restored 35 hectares in the areas surrounding its centres.

As a result of these habitat restoration and protection actions, it works in landscape integration or plantations in degraded areas or those lacking in vegetation, in 2021, a total of 127,594 plantations were carried out (of which 74,947 were voluntary tree plantations).

Bodies of water significantly affected by catchment or discharge

In ACCIONA Energía water collection and discharge are necessary to carry out certain activities. Therefore, the company uses prevention measures, such as water treatment prior to discharge or installation of systems that improve the connectivity between river sections. This helps minimise potential impacts on species that may be present in river ecosystems. This also guarantees respect for the regime of environmental flows and the technical requirements established by the competent authorities.

> Climate	45	< Biodiversity	57
> Water	54	> Integrated environmental management	60
> Circular economy	55		

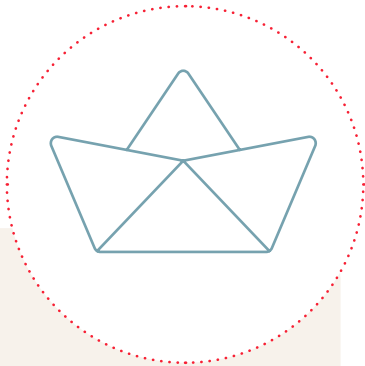


## Voluntary plantations in renewable energy generation

According to the aim of ACCIONA Energía to invest to regenerate the planet, in 2021 the company planted trees voluntarily in some of the countries in which its assets are. By planting trees the company contributes to fight global warming involving the absorption of CO<sub>2</sub>, thus promoting biodiversity as they provide food and shelter to animal species and reducing the erosive effect of the reforested land.

A total of 74,947 trees were voluntarily planted.

- > In Spain, 60,000 trees were planted for the reforestation of burnt Public Utility Mountains. The company participated in two projects: Public Utility Mount No. 60 “Valle De Iruelas” by planting 20,000 trees and the reforestation in Public Utility Mount No. 134 “Orzaduro” by planting 40,000 trees. The species used were wild pine tree (*Pinus sylvestris*), birch tree (*Betula alba*) and rowan (*Sorbus aucuparia*). The company undertook to keep the planted trees for at least 40 years.
- > In Mexico, 11,947 trees were voluntarily planted in the area where the Oaxaca wind farms are located. The main aim of plantations is to rehabilitate important natural areas in the ejidos and communities which had previously changed land use from forest to agricultural use and were abandoned. For the reforestation of these areas 6 different species were used, mainly moringa (*Moringa oleifera*), oak tree (*Quercus robur*) and river tamarind (*Leucaena leucocephala*).
- > In India 2,000 trees were planted in the surroundings of Tuppadahalli wind farm.
- > Finally, in the new Cerros de Renca metropolitan park in the city of Santiago de Chile the reforestation of an area of 0.71 hectares was carried out with 1,000 trees of 8 different species, mainly carob tree (*Prosopis chilensis*) and hawthorn (*Acacia caven*).



## Mediterranean tortoise protection

In the Balearic Islands (Spain) there two species of protected land tortoise: Mediterranean (*Testudo hermanni*) and Greek tortoise (*Testudo graeca*).

In the building of Petra and Lloseta photovoltaic plants in Majorca preventive measures to protect these species were taken:

- > Drafting a detection and rescue protocol: to establish an action and protection plan for the detection of the animals.
- > Training of workers: inform the staff of the site of the existence and importance of the protected fauna and how to act if they find an animal in the site.
- > Installation of signs: reminding staff how to act if a protected tortoise is found, including a contact telephone number.
- > Daily inspections prior to the commencement of the works: to detect animals, collect them and take them to a safe place.
- > Placing escape routes: to help any animal trapped in ditches or excavation.
- > Installation of deterrent means (fence and mesh): in case of opened ditches, allowing some time to prevent the fall of any small animal into it.
- > Animal rescue: the engagement of the site personnel was essential to rescue the animals and take them to a safe place.

› Climate	45	› Biodiversity	57
› Water	54	‹ Integrated environmental management	60
› Circular economy	55		



Protection of chiroptera in the environment of El Berbel hydroelectric plant

At El Berbel Hydroelectric Plant, located in Tudela (Navarre), an old transformation centre was refurbished as a shelter for a bat colony that was previously in an area at risk of collapsing.

The works carried out focused on improving the accessibility of the bats to the building, as well as external and internal refurbishing (placing nest boxes and structures), to create optimal conditions for the colony, low brightness, quiet conditions, temperature stability and protection against predators.

INTEGRATED ENVIRONMENTAL MANAGEMENT

Since all industrial activity involves a potential impact on the environment where it takes place, the company adheres to the precautionary principle, especially when it comes to managing environmental, climate and water risks in an integral way, reducing and offsetting emissions, promoting the circular economy, and conserving biodiversity.

ACCIONA Energía has especially qualified staff in each of the functional, hierarchical and geographical areas. This means that top quality and experience can be employed at all times in pursuing the company’s business, always according to the strictest environmental standards.

Last year, the company allocated €17.63 million to the management (prevention, reduction or correction) of the environmental impacts generated by its operations (€17.53 million in expenditures and €0.1 million in investments).

ACCIONA Energía continues to promote its commitment to environmental training. In 2021, employees received a total of 1,052 hours of training in areas such as climate change, environmental management systems, waste management and environmental restoration of degraded areas, among others.

PRINCIPLES OF SUCCESSFUL ENVIRONMENTAL MANAGEMENT

The environmental management model of ACCIONA Energía is based on the principles of improving environmental performance, defining environmental aspects from a life cycle perspective, and determining the risks and opportunities as a way of ensuring improvement.

Through the company’s environmental management systems, the potentially negative impacts of the company’s carbon emissions and other harmful gas emissions, discharge, waste generation, use of resources in addition to noise and light pollution, are identified, evaluated and minimised, while maximising the positive impacts.

ACCIONA Energía’s environmental management systems are verified and certified by accredited independent bodies, according to the ISO 14001 standard.

The components of the management model are as follows:

- > Identification, evaluation and minimisation of environmental alterations that may be caused during the company’s activities.
- > Analysis of environmental risks through a regulated technical procedure that quantifies the risk of an accident that could cause environmental damage or have a negative environmental impact on ACCIONA Energía’s business.
- > Identification and verification of legal requirements using tools especially designed for this purpose which make it possible 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.
- > Recording and classifying environmental near-misses<sup>7</sup>.
- > 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.

7. An environmental near miss is any incident that does not result in damage to the environment but has the potential to do so. During 2021, the company has registered 2 environmental near-misses, which have led to the spillage of a total volume of 0.14 m³ of discharge that have been resolved by adopting corrective measures.volumen total de 0,14 m³ de vertido que se han resuelto mediante la adopción de medidas correctoras

SUSTAINABILITY REPORT 2021	
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EVALUATION AND MANAGEMENT OF ENVIRONMENTAL IMPACT

Last year, 81 projects promoted by ACCIONA Energía were subject to Environmental Impact Assessment (EIA). In 15 cases, favourable environmental impact statements were obtained. The EIAs for these projects were published in the corresponding official bulletins and platforms were set up by the government to channel citizen participation and obtain their feedback in this regard.

In addition, ACCIONA Energía tracked 184 Environmental Monitoring Plans (EMPs) at centres and facilities that were under construction and/or operation.

ENVIRONMENTAL FINES AND PENALTIES

In 2021, a total of €1,688 was paid, corresponding to 1 environmental fine/penalty.

Provisions relating to probable or certain liabilities, litigation in progress and indemnity 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.

OTHER EMISSIONS

Global emissions of ACCIONA Energía of NOx in 2021 were 688 tonnes, SOx 125 tonnes, PM<sub>10</sub> 4.6 tonnes and SF<sub>6</sub> 0.0316 tonnes. The company set the target to reduce this type of emissions by 2% compared to the 2017 figures. The target was met for all the indicators except for NOx.

Last year, 81 projects promoted by ACCIONA Energía were subject to Environmental Impact Assessment (EIA)

Evolution of other emissions (tonnes)

	2017	2018	2019	2020	2021
NOx	565	629	578	662	688
SOx	180	244	191	137	125
PM <sub>10</sub>	8.2	13.3	18.5	5.4	4.6
SF <sub>6</sub>	0.0801	0.0501	0.0543	0.0548	0.0316



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# EXPONENTIAL LEADERSHIP



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# AUTHENTICITY, TRANSPARENCY WE PURSUE A PURPOSE

ACCIONA Energía is not neutral. It has a deep commitment as an active participant in the sustainable transformation of this decade.

	Responsible	Resilient	Regenerative	
Authenticity	Commitment	Connect and Share	Act and Transform	Share the same values, work towards the same purpose in each work centre
Sustainable transformational innovation	Digitalising	Collaborate to innovate	Responses applied	Develop a regenerative differentiating innovative value in the principal solutions
Governance	Diversity	Risk control and management	Strategic alignment	Maintain leadership from the governing body for stimulating and supervising the fulfilment of the purpose
Transparency	Reporting	Dialogue and Promote	Cooperate	Contrast through continuous review



## KEY MILESTONES 2021

- › Collaboration with firms developing batteries and storage systems in the Innovative Storage Hub.
- › Development of 100% renewable Campus initiatives and programmes.
- › Creating the Audit and Sustainability Committee.
- › Establishing a Framework Agreement for existing and future relationships between ACCIONA Energía and ACCIONA, after being listed on the stock exchange.
- › Launching a tool for managing communications of the Ethics Channel and setting up the Ethics Channel Committee.
- › 94% of contracts with local suppliers.



## MAIN CHALLENGES 2022

- › Promoting decarbonisation of the industrial sector by producing and consuming green hydrogen.
- › Making progress in the new electromobility with smart two-way recharging solutions.
- › Adapting standards for intragroup operations in investee companies.
- › Updating the objective and Code of Conduct so that they may serve as tools for cultural empowerment.
- › Obtaining the ISO 37001 for Anti-Bribery Management Systems and the UNE 19601 Criminal Compliance Management System.
- › Formalising the Internal Control Framework for Non-financial Reporting.

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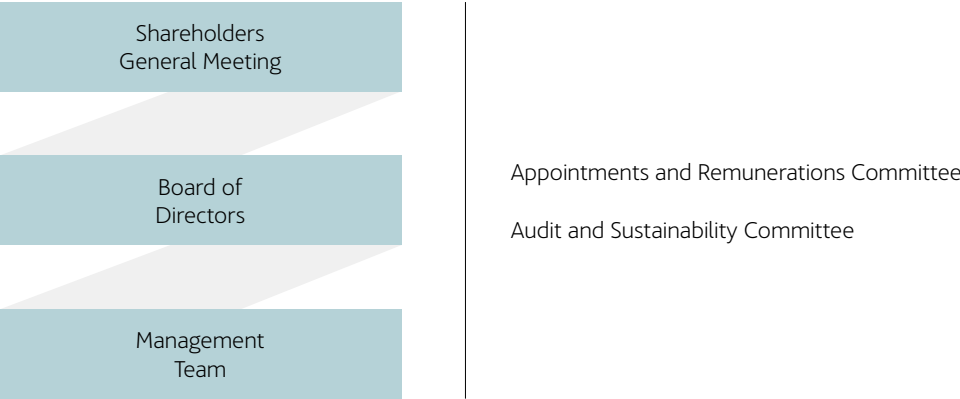
GOVERNANCE

CORPORATE GOVERNANCE

In 2021 ACCIONA Energía created new governance bodies when it started trading on the stock market.

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

New governance structure of ACCIONA Energía



**i** More information in breakdown of governing bodies:  
<https://www.accion-energy.com/shareholders-investors/corporate-governance/board-directors-committees/>

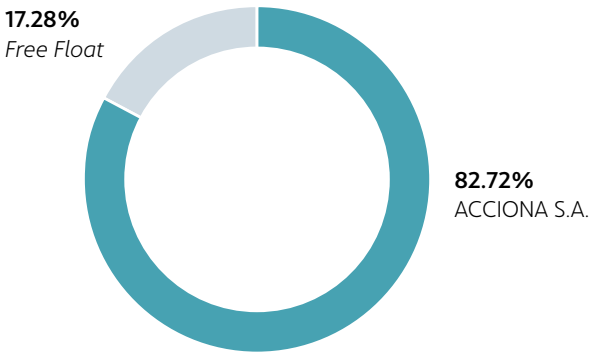
Shareholders

At the time of preparing this report, the share capital of the parent company was represented by 329,250,589 ordinary shares registered by book-entry securities, each with a par value of 1 euro, fully subscribed and paid up.

In July 2021, and as a result of the Initial Public Offering (IPO), procedure carried out by ACCIONA S.A., shares of ACCIONA Energía representing 17.25% of the company’s share capital were admitted for listing on the stock exchanges of Madrid, Barcelona, Bilbao and Valencia.

**i** More information on the Initial Public Offering:  
<https://www.accion-energy.com/shareholders-investors/initial-public-offering/>

Shareholdings as of the date of preparation of this report



Directors had a 0.014% shareholding included in the free float.

The company’s articles of association do not contain any restrictions or maximum limit to shareholders exercising their voting rights. Nor are there any limitations under the law or the articles of association regarding share transfers or acquisitions. Notwithstanding this, the members of the management team have signed a lock-up commitment for one year since the shares were listed for trading, under which they cannot transfer company shares they received as a bonus following the conclusion of the IPO process. As is habitual market practice, ACCIONA Energía and ACCIONA S.A., as the majority shareholder, abstained from transferring company shares for six months from the end of the stabilisation period following the IPO. The terms and conditions of those commitments are described in the prospectus for admission to trading approved by the National Securities Market Commission [CNMV].

Under the terms of the second recommendation of the Code of Good Governance for Listed Companies, ACCIONA and ACCIONA Energía have entered into a Framework Agreement for Relations which defines the Scope of action of each one, the management of any conflicts of interest, the mechanisms for the settlement of any possible disagreements and the regulation of business opportunities, based on the principles of priority and protection of the interests of ACCIONA Energía’s minority shareholders. The agreement also sets out the procedure for authorisation and processing any related transactions and the regulation of information flows between both sides.

Board of Directors

The Board of Directors, created in 2021, is the ultimate body for company management and representation, except in certain matters that are reserved for the Shareholders General Meeting. It is composed of professionals with a wide range of skills, origins, experience, nationalities and gender, and its goal is to bring real value to the company, working every day on management based on integrity and transparency, as efficiently and effectively as possible.

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This diversity in the composition (45% are women), has largely contributed to the company receiving a high score of 86 out of 100 on good governance aspects in the S&P Global Ratings on ESG.

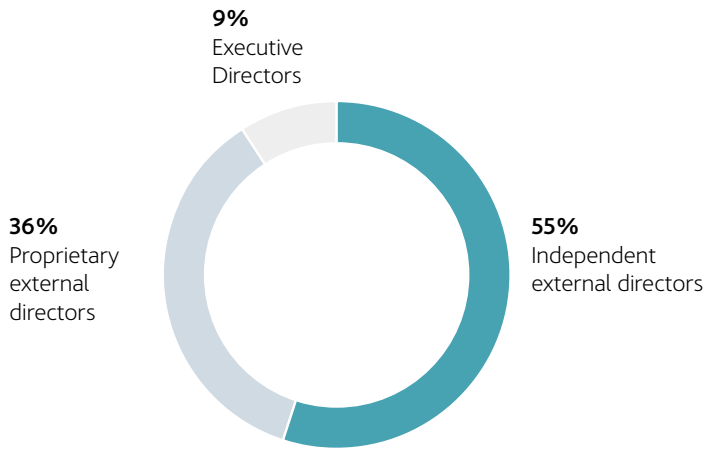
The Board of Directors’ objective is to promote corporate/social interests representing the company and its shareholders in the management of its assets and businesses, and directing business organisation.

The Policy for the Composition of the Board of Directors adheres to the recommendations of the Code of Good Corporate Governance.

Board members will hold office for two years, and may be re-elected once or more times. The Board of Directors of ACCIONA Energía is composed of eleven members:

- > Six are independent directors.
- > Four are proprietary directors.
- > One is executive director.

Composition of the Board according to the nature of the position



Five women sit on the Board, accounting for 45% of its total members, which exceeds the target of 40% established in recommendation 15 of the Code of Good Governance for Listed Companies since its creation. The Appointments and Remunerations Committee will continue to promote measures that encourage the company to have a significant number of female executives.

Board of Directors at 31 December 2021

Member	Profile	1st appointment (year)	Board Committee to which they belong
Mr José Manuel Entrecanales Domecq	Chairman and Proprietary Director	2021	
Mr Juan Ignacio Entrecanales Franco	Proprietary Director	2021	
Mr Rafael Mateo Alcalá	Executive Director	2021	
Ms. Sonia Dulá	Proprietary Director	2021	Audit and Sustainability Committee (committee member)
Mr Juan Luis López Cardenete	Independent Director	2021	Appointments and Remunerations Committee (committee member)
Ms. Karen Christiana Figueres Olsen	Proprietary Director	2021	Appointments and Remunerations Committee (committee member)
Mr Alejandro Mariano Werner Wainfeld	Independent Director	2021	Appointments and Remunerations Committee (committee member)
Ms. Inés Elvira Andrade Moreno	Independent Director	2021	Appointments and Remunerations Committee (chairman)
Ms. Ms María Salgado Madriñán	Independent Director	2021	Audit and Sustainability Committee (chairman)
Mr Rosauro Varo Rodríguez	Independent Director	2021	Audit and Sustainability Committee (committee member)
Ms. María Fanjul Suárez	Independent Director	2021	Audit and Sustainability Committee (committee member)

Attendance and meetings of the Board of Directors and Committees in 2021

	Board of Directors	Audit and Sustainability Committee	Appointments and Remunerations Committee
Quorum of attendance	92.42%	95%	100%
No. meetings	6	5	1

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

In order to ensure the standard and efficiency of its management, each year the Board of Directors will assess its functioning, including the performance and the input of each member and the diversity in the composition and responsibilities. The assessment of the performance of the functions and office of each director, the Chairman and the committee chairmen will be conducted on the basis of the report made by the Audit and Sustainability Committee and the Appointments and Remunerations Committee. The assessment of the functioning of the Committees and their officers will be made on the basis of the report made by each Committee to that end.

The evaluation will be made using individual forms to be filled out anonymously by each director. Once filled out, the Audit 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 any areas for improvement and supervises any changes that will be introduced.

In compliance with recommendation 36 of the Code of Good Governance for Listed Companies, ACCIONA Energía will perform the evaluations with the support of external consultants, at least every three years, the first being planned to take place for 2023.

Also, as an additional measurement of assessment, the Regulation of the Board and the Regulation of the Committees establish that the company must make an annual independent evaluation.

Management Team

The Management Team is composed of 25 professionals in Spain and abroad, from different departments and specialisations. The company has notified the CNMV of any members who hold offices with management responsibilities for the purposes of Regulation (EU) No. 596/2014 on market abuse, and the first-time notification in this respect was the publication of the prospectus for admission to trading approved by the CNMV and published on both the company web site and that of the regulatory authority.

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

Remunerations Policy

The directors’ remunerations policy for the years 2021 to 2024 was approved as a separate point on the Agenda by the sole shareholder of the company at the time, ACCIONA, S.A. Article 529r. of the Spanish Corporations Act and Article 29 of the Articles of Association of ACCIONA Energía establish the requirement of approving the system for directors’ remunerations at least every three years, as a separate point on the Agenda of the Shareholders General Meeting. The directors’ remunerations policy was drawn up taking into account the changes introduced under the amendments to the Corporations Act passed in 2021 under Act 5/2021 of 12 April.

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

- > Consistency in the business strategy.
- > Corporate governance and transparency.
- > Balanced design.
- > Internal equality.
- > Alignment with market practice.
- > Linked to employees’ conditions.

**i** More information on the Directors’ Remunerations Policy:  
<https://procoazrbolsast1.blob.core.windows.net/media/p1xjq2ii/politica-remuneraciones-caer-2021.pdf>

Furthermore, on 26 May 2021, ACCIONA S.A. as sole shareholder, approved the 2021 Performance Share and Stock Awards Plan (known internally as “Plan 2021”) for the period from 2021 to 2025, which is aimed at the executive directors of ACCIONA Energía. Associated with the creation of value, with 80% of deferred awards following the end of the period applicable and the remaining 20% in 2027, and with at least one year having elapsed since the first award, the Plan 2021 is intended to guarantee that the evaluation process is based on long-term results and takes into consideration the underlying economic cycle of the company.

*The Annual Directors Remuneration Report* gives an individualised breakdown of the compensation received by each one.

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ETHICS AND ANTI-CORRUPTION

Fight against corruption, bribery and money laundering

The specific policies of ACCIONA Energía to fight corruption, bribery and money laundering, are as follows:

- > **Anti-Corruption Policy:** this sets out the company's clear, specific position against any corrupt or criminal action, which extends to everyone working in a professional capacity in the company.
- > **Crime Prevention and Anti-bribery Policy:** this strengthens the company's zero-tolerance commitment in respect to illegal activities, using permanent monitoring measures for preventing and detecting any such actions, effective mechanisms of communication and awareness-raising in all employees and a corporate culture based on ethics and observance of applicable legislation.

These guidelines have been developed on the basis of international standards and have been implemented in the organisation under guidelines and procedures that regulate aspects such as donations and sponsorships, selection of partners and contracting of business consultants, interacting with public officials, gifts and hospitality, international trade sanctions, antitrust compliance, prevention and management of conflicts of interest, selection and variable remuneration.

The rules deriving from these policies are applicable to ACCIONA Energía, all of its employees and to third parties connected to the company.

The Anti-corruption Regulations provide specific guidelines for avoiding inappropriate conduct and are applicable to and binding on all employees and groups associated with ACCIONA Energía (including agents, intermediaries, advisors, consultants and suppliers).

Organisation and management model

In the conducting of its business, the company maintains relationships with Public Administrations and participates in tender processes in different countries, meaning the risks of corruption have to be analysed for each project depending on the country and the relevance 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 Ethics and Compliance Office and Internal Audit 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 Ethics and Compliance Office reports to the Audit and Sustainability Committee under the Board of Directors.

ACCIONA Energía has adopted and put into effect an Organisation and Management Model for the Prevention of Offences and Criminal Risks with the following features:

- > It is designed in accordance with 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 has been linked to internal controls that to some extent reduce the probability of involving a criminal risk.
- > It gives these internal controls 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 Model also includes supervision measures belonging to the group's System for Internal Control over Financial Reporting (ICFR), as appropriate for preventing certain crimes from being committed.

The main initiatives carried out in 2021 in this field were:

- > Creation of the ACCIONA Energía Ethics and Compliance Office and the Ethical Channel Committee. Work commencing for obtaining the ISO 37001 and UNE 19601 certifications.
- > Certification of the awareness and compliance of 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 and the Corporate Antitrust Compliance Standard on the part of the persons responsible for monitoring and supervisors and also the Management Team. In addition, a considerable part of the controls set out in the Model has been supervised by requesting evidence of the application of those controls, and new controls arising from the new regulations approved have been incorporated.
- > Updating the Corporate Antitrust Compliance Standard and the Corporate Standard for Selection of Partners and Contracting Business Consultants. Commencing the process for reviewing and updating the Code of Conduct, which is expected to be completed in 2022.



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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 Energía anti-corruption guidelines

The company expressly forbids:

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

### Anti-money laundering measures

All ACCIONA Energía employees are required to pay special attention to any circumstances revealing a lack of integrity of the persons or entities with which the company maintains business relationships. 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.

There is a general course available on the prevention of money laundering in the Planet Compliance training programme.

A news item appeared in the media during the year involving an investigation for money laundering in the El Cortijo wind farm (Mexico), which belongs to the group. The company requested a meeting with the Mexican Financial Intelligence Unit (UIF) to have first-hand knowledge of the situation of that plant. The UIF responded with an official statement saying that ACCIONA Energía was not subject to investigation for money laundering and that it is not on the list of companies with accounts frozen for tax offences.

### Code of Conduct

The Code of Conduct reflects the values that are to guide the behaviour of all companies making up ACCIONA Energía. 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 assumes 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. Some of these standards include: 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 United Nations Global Compact.

The Code of Conduct, the Anti-corruption Regulations and the Crime Prevention and Anti-bribery Policy must be read and accepted by all employees. Over 95% of Energía's personnel have accepted the Code of Conduct.

ACCIONA Energía has established an Ethical Channel Committee to analyse and settle any communications and complaints involving violations of the Code of Conduct and internal regulations.

In 2021, the Ethical Channel received 12 communications for which 11 procedures were investigated, 8 by an external investigator and 3 by an in-house investigator. Access to the Channel is available on the ACCIONA Energía web site in Spanish, English and Portuguese.

Per type, 11 of them were labour-related and one was related to finance/non-payment of bills. Five of the labour-related complaints were for harassment at work. All the cases have been processed. In most cases there was no evidence of harassment as defined by legal theory and jurisprudence of the labour courts. Nevertheless the measures proposed by the investigator were adopted, such as training courses, evaluations by the prevention team, warning letters and measures for improving the working environment.

None of the complaints received refers to making 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 conserving a business or competitive advantage for the company. Nor have any notifications been received relating to tax issues.



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Compliance communication and training

In 2021, 140 communications were made regarding the Code of Conduct, Anti-corruption Regulations, 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 the specific newsletter on the subject.

In particular, 55 publications were posted on the intranet (50 in 2020), which included relevant information on anti-corruption relating to issues such as gifts, bribes, intermediaries and agents or interaction with public officials. There were also 5 communications associated with antitrust compliance issues. They also promote the importance of the Ethical Channel for reporting irregularities, expressly including those relating to protection of competition.

Through the Compliance Survey it is confirmed that 100% of the employees are familiar with the Code of Conduct and the Anti-corruption Regulations and 92% with the Ethical Channel.

In regards to training, executive programmes have been conducted in Latin America on ethical culture, corporate reputation, compliance model, Code of Conduct, the main standards and policies, local regulations applicable and the Ethical Channel. There has also been a specific course on international trade sanctions. The “Fighting against corruption” seminar is compulsory for anyone in a management or executive role. Lastly, regular training sessions were given on the rule about donations and the third-party management tool

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

Country	Code of Conduct	Anti-corruption Course
Spain	336	131
United States	284	36
Mexico	169	40
Chile	62	10
Australia	44	7
Others	69	35
Total	964	259

Contributions to foundations and non-profit organisations

ACCIONA Energía 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 Energía 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 Energía 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.

Lastly, all contributions fall under the ACCIONA Energía Social Action Plan, the aim of which is to bring 100% of the social aid in line with the company’s objectives, through sustainable projects in the medium/long term in all the places where it operates.

In 2021, ACCIONA Energía contributed €870,333 to different organisations in the sector, amongst others

Contributions to sectoral associations

Organisations	Contribution	Institutions receiving the main contributions (in order)
Sector associations	€717,317	American Clean Power Association, Wind Europe, Global Wind Energy Council, Spanish Wind Energy Association, Association of Renewable Energy Businesses.
Institutions for the technical development of ACCIONA Energía	€149,439	International Emissions Trading Association (IETA), Land and Liberty Coalition, Economics for Energy, Clean Grid Alliance, Advance Energy Economy, Spanish Energy Club.
Institutions for promoting sustainability and global dialogue	€3,577	Global Compact and Acción Empresas**
TOTAL	€870,333	

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The main area to which contributions were made was decarbonisation of the economy and clean energy. ACCIONA Energía is focused on actively pursuing the implementation of the Paris Agreement and its decarbonisation commitments across all the geographic regions in which it operates. To this end, it is actively involved in training and communication, either directly or through collective study groups or trade associations, 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, contributing in issues mainly related to the promotion of renewable hydrogen, development of the offshore wind farms in Spain, hybridisation of renewable energy technologies, simplification of the formalities for renewable energy projects, including distributed generation and self-consumption, amongst other issues. In 2021, a total of € 820,809 was invested in this area.

Due diligence of third parties

This procedure is carried out through the PROCUR-e website and Dow Jones Risk Center site for partners, intermediaries and commercial agents acting on behalf of ACCIONA Energía. In addition, the company has three documents that describe how to perform due diligence: the Purchasing Guide, the Instruction on the Registration, Certification and Evaluation of Suppliers, and the Corporate Standard for the Hiring of Business Consultants.

The Dow Jones Risk Center 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, amongst other information. In 2021, 70 third parties were registered in this tool.

The main area to which contributions were made was decarbonisation of the economy and clean energy

TAX INFORMATION

Tax policy

Transparency and fiscal responsibility are important issues for ACCIONA Energía, and are related to its economic performance.

The company's tax policy, approved in 2021, defines the company's approach to all taxation matters, as well as its consistency with the global business strategy. It is applicable to all group companies. It is based on the following principles:

- > Compliance with the tax obligations in the different countries and areas where the group operates, paying the taxes required in accordance with the legal regulations.
- > Companies making decisions on tax issues based on a reasonable interpretation of the regulations, and closely connected with the group's business activity.
- > The prevention and reduction of significant tax risks, ensuring that the taxation bears an adequate relation to the structure and location of the activities, human resources and materials and the business risks.
- > Strengthening relations with the tax authorities based on respect for the law, loyalty, trust, professionalism, cooperation, reciprocity and good faith.
- > Informing the management bodies on the relevant tax implications of the operations or matters submitted for its approval.
- > The conception of taxes paid in the countries and territories as its contribution to the support of public expenditure and, therefore its contributions to society.
- > Keep suitable internal channels in place to facilitate the reporting of any irregularities.
- > Ensure that the bodies responsible for supervising and monitoring the application of the policy and the management system have the resources, autonomy and sufficient authority and independence to efficiently and proactively monitor functioning and compliance.

< Governance	64	> Authenticity	76
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The company’s tax policy, approved in 2021, defines the company’s approach to all taxation matters, as well as its consistency with the global business strategy.

In application of these principles, the company assumes the following good tax practices, among others:

- 01

To not use artificial corporate structures unrelated to the group’s activities and for the sole purpose of reducing its tax burden nor, in particular, carry out transactions with related parties purely for the purpose of eroding the tax base or transferring profits to territories with low taxation.
- 02

To avoid companies with an opaque structure for tax purposes, these being understood as any intended to prevent the Tax Authorities from knowing who is the end-user responsible for the activity or the ultimate holder of the assets or interests involved.
- 03

To not incorporate or acquire companies having their residence in countries or territories that Spanish legislation considers tax havens or included on the blacklist of jurisdictions that do not cooperate with the European Union, with the sole exception of any circumstances in which the group is obliged to do so due to there being an indirect acquisition in which the company in question is part of a group of companies being acquired.

- 04

To follow the recommendations of the codes of good tax practices. ACCIONA Energía currently submits the Annual Tax Transparency Report to the Spanish Tax Agency (AEAT), having signed up to the agency’s Code of Good Tax Practices in 2011. It also submits an annual voluntary Tax Transparency Report to the ATO (Australian Taxation Office). The company is also committed to complying with OECD Guidelines on multinational companies in respect to taxation.

- 05

To cooperate with the competent Tax Authorities in detecting and finding solutions for fraudulent tax practices that the company becomes aware of.

Transfer pricing

Fees for management support services provided by ACCIONA Energía to its investees and related companies are calculated on the basis of the direct and indirect costs incurred by the entity providing the support services, with the application of a market margin. This is consistent with the ranges of market values identified and obtained by independent organisations that provide services of a similar and comparable nature.

The criterion applied by ACCIONA Energía in the valuation and quantification of the different activities it performs is the arm’s length principle or market value, as defined in the OECD Guidelines. The arm’s length principle used by the Company 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 that would have participated in comparable transactions in similar circumstances. In order to comply with this principle, the group is aware that the results of its application must be within the range of the results of a comparable uncontrolled transaction. The group also understands that results, comparability, reliability and range are of fundamental importance in the process of defining prices and transactions if it aspires to correctly comply with this principle.

1

Letter from the Chairman

2

Only in renewables

3

Degree of fulfilment of commitments

4

People centric

5

Planet positive

6

Exponential leadership

7

Integrate to transform

8

Impact per region

9

Appendices

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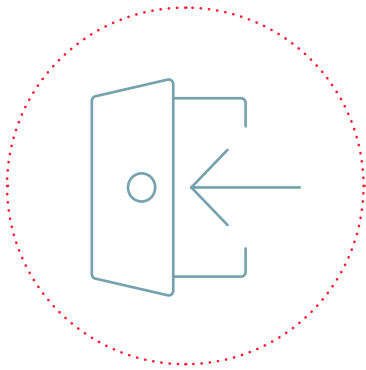
Governance and control of tax policy

The Board of Directors is responsible for defining the company's tax strategy, as well as ensuring compliance through an appropriate control and supervision system. The Board therefore assumes the following non-delegable powers:

- > The design of the company's tax policy.
- > The determination of tax risk control and management policies.
- > The approval of investments or operations which, due to their high amount or special characteristics, are of a strategic nature or have a particular tax risk, unless their authorisation corresponds to the General Shareholders' Meeting.
- > The approval of the creation or acquisition of shares in special purpose entities or entities domiciled in countries or territories considered tax havens.
- > Consent for any similar transaction which, due to its complexity, could undermine the transparency of the company and its group.

The Audit Committee is responsible for supervising the effectiveness of the tax risk control and management systems. As part of its activity, the Committee analyses the corporate tax principles and tax strategy, prior to their consideration and approval by the Board of Directors, as well as its adherence to the Code of Good Tax Practices. It also monitors the application of all these tax guidelines, analysing any relevant issues related to the legal and tax risks applicable to the group. The results of the monitoring are published on the company's website.

The Tax Department is responsible for developing the principles of the tax strategy, and establishing the control mechanisms and internal rules necessary to ensure compliance with current regulations and the aforementioned principles. It also advises the Board of Directors and senior management on matters with tax implications, and reports periodically to the company's governing bodies on the degree of compliance with the tax strategy. This area reports to the Board of Directors on the year's most significant tax-related issues, as part of



the non-delegable functions of the Board of Directors, as well as the management of risks of this nature, and investments or transactions with any tax implications carried out during the year.

Tax risks are incorporated into ACCIONA Energía's Risk Map, using the same methodology and mitigation plans applied to the rest of the Group's risks.

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.

Dispute and litigation management

ACCIONA, the parent company of ACCIONA Energía, submits an Annual Tax Transparency Report to the Spanish Tax Agency (AEAT) every year. The company has adhered to AEAT's Code of Good Tax Practices since 2011. In strict compliance with its tax and fiscal transparency obligations, the company delivers a Country-by-Country Report to the Spanish Tax Agency every year. Since 2018, it has also delivered a Tax Transparency Report to the Australian authorities (Australian Taxation Office).

ACCIONA Energía's Financial Statements also report on the "Years subject to tax inspection".

The Ethics Channel makes it possible to confidentially report any irregular behaviour related to any case of breach of 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 Energía'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 due (M€)	Corporate Income Tax paid on a cash basis (M€)	Employees at the close of 2021	Grants (M€)	Footnote explaining effective rate due	Footnote explaining effective rate paid
Spain	1,502	423	87.5	10.2	992	0.02	1	7
Mexico	188	41	17.4	8.9	110	-	4.6	7
Italy	55	33	9.5	1.5	17	-	4	7
Portugal	133	21	6.1	2.4	23	-	5	8
Chile	229	12	10.1	2.9	179	-	3	2
Australia	59	-6	0.3	-	123	-	3.4	2.7
India	19	-6	0.6	0.5	42	-	5	2
Others	287	45	38.2	2.4	277	0.90		
Total	2,472	562	169.6	28.9	1,762	0.92		

There are differences between the indicator of Income Tax paid on a cash basis present in this Annual Report and that reported in the consolidated annual accounts due to a difference in criteria. The indicator that appears in this Report includes the collections/payments made within the Tax Group.

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

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:

1. Reversal of non-deductible expenses (non-taxable income).
2. Tax losses in the year.
3. Allocation of consolidation vs local accounts (Corporation Tax payments).
4. Tax rate for Corporation Tax higher than in Spain
5. Non-capitalisation (recording) of tax credits.
6. Non-deductible expenses and adjustment for inflation.
7. Application of tax credits.
8. Non-application of payments made by companies measured using the PPE method.

At 31 December 2020, the company received grants amounting to € 915,958.

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

Relationship with the auditor

The item *Remuneration and other benefits* of the Consolidated Annual Accounts contains the information on the fees in relation to accounts 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.

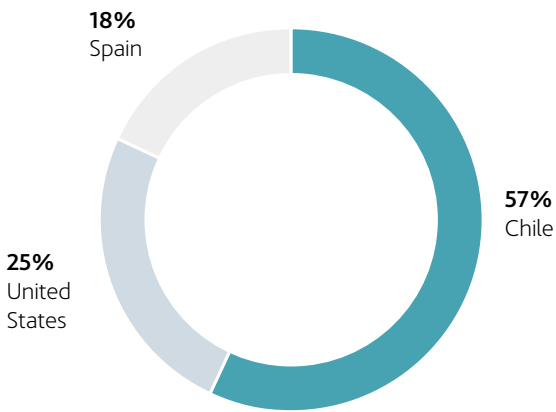
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SUSTAINABLE TRANSFORMATIVE INNOVATION

The aim of the Sustainability Master Plan 2025 is to link the innovation strategy to ACCIONA Energía’s regeneration. We aim to be a reference in the development of new and enhanced business operational solutions, more digital and able to increase the sustainability productivity of the projects.

In 2021, ACCIONA Energía reported spending €91.4 million on innovation, 14.3% more than the previous year. The portfolio of projects totalled 60, 40 of which were research projects and 20 innovation projects. The company has carried out 3 projects outside of Spain worth €75 million, representing 82% of the total innovation figure reported.

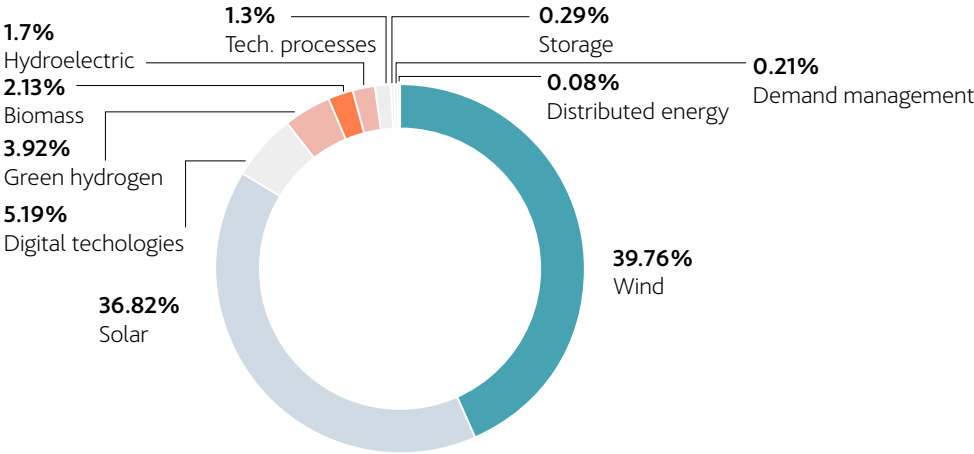
Innovation figure per country (%)



The innovation intensity ratio, obtained by dividing sales by innovation spending, was 3.7% in 2021.

In 2021, ACCIONA Energía reported spending €91.4 million on innovation, 14.3% more than the previous year

Innovation figure per technology (%)



INNOVATION IN BUSINESS

The Energy Innovation Centre is located in Sarriguren (Navarra) and Madrid. Its personnel are divided among those two centres in Spain, plus others located in Chile and Mexico. Its fields of work is focused on renewable energy:

Extending the useful life of assets

Predictive technology is developed based on physical models and data models to lengthen the useful life of power generation assets.

In the Solarbrain project a predictive maintenance tool has been developed that enables failures in photovoltaic plants to be rapidly detected, which contributes to improving availability and therefore the production of the plants.

Maximisation of production

Technological solutions are created for reducing the LCOE (levelised cost of energy) and increasing the electricity produced, without affecting the safety and useful life of the assets.

Within the framework of the Maxpower project, a pilot has been set up in the Tallat wind farm (Spain) to test a methodology that detects turbines with pitch angle errors and calculates the corrections for the position of the blade, to maximise production.

Advanced technologies in operation and maintenance (O&M)

Advanced technologies are developed for optimising the O&M of wind, solar and biomass assets.



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Advanced photovoltaic technology

New solar photovoltaic technology is implemented in both the construction phases and O&M.

The 1,125 MWp floating photovoltaic plant in the Sierra Brava reservoir (Spain) has completed one year of monitoring the environmental performance and production of five innovative photovoltaic systems, with different technology and configurations.

The El Romero Hub 2.0 (Chile) has installed pre-commercial technology using bifacial modules, having completed an assessment of the increased production compared to conventional technology and its use in future commercial plants.

Innovation to ESG

Solutions are designed and implemented to minimise ESG risks, and to raise the corresponding standards in those aspects for all company developments.

The Avisave project for the protection of birdlife at wind farms is monitoring the behaviour and effectiveness of five systems for detecting birds and halting wind turbines at the Loma de Lázaro and Cabeza Morena plants in Spain.

Storage and hybridisation

Development and validation of technology that makes it possible to integrate and manage storage systems in renewable energy production plants to substantially increase the inclusion of renewable energy in the grid, and also to take an active part in supplying energy to the auxiliary grid services.

New business models in digital innovation

New energy models based on digital solutions that guarantee the renewable energy source, and also data traceability, governance and administration.

Renewable hydrogen

Complete development of the green hydrogen ecosystem as an energy vector for the decarbonisation of the industry and of society.

Vehicle to grid

Technological solutions for the new electromobility and energy management.

Waste to industry

Circular economy solutions are developed in all aspects related to energy production.

Research has been conducted on the recovery of biomass slag with two demonstrations of non-intensive roadways, one in the Celada wind farm and the other in the grounds of the Miajadas Biomass plant, using different percentages of biomass slag.

A project has also been launched for recycling the fibreglass of turbine blades for manufacturing pultruded beams for photovoltaic structures.

Offshore wind energy

Development of new pilot projects and prototypes for demonstrating offshore wind energy technology.



Power to Green H<sub>2</sub> Mallorca

This project is pioneer in green hydrogen production in southern Europe. It represents the first renewable H<sub>2</sub> ecosystem on an island in the European Union at industrial level and will enable it to be replicated at another five islands.

The project comprises two photovoltaic plants that feed a green H<sub>2</sub> production plant that will be put to different uses and business models such as the substitution of natural gas for hotel chains and municipal services infrastructure, or the decarbonisation of public transport: bus fleets and vehicle hire companies, amongst others. The project also includes the construction of the first exclusive distribution network for renewable H<sub>2</sub>, and also the first green H<sub>2</sub> connection point in the natural gas networks in Spain.

The project also includes new solutions based on blockchain technology to trace the renewable source of the electricity and green hydrogen received by customers in their facilities through injection into the natural gas network.

This project marks the beginning of green H<sub>2</sub> as a new vector for decarbonisation. This energy sector has a key role in the energy transition because it allows decarbonisation solutions to be brought to sectors that are difficult to electrify such as heavy transport, maritime transport, the industry requiring high temperatures, and also fosters the storage of electricity over long periods of time and seasonality. The project will make Mallorca a reference for decarbonised energy models.

The Power to Green H<sub>2</sub> Mallorca project has been hailed as a shining example against climate change by the President of the European Commission at the opening of the EU Sustainable Energy Week in 2021.

At the end of December 2021 the first molecules of green H<sub>2</sub> were generated in the Lloseta plant (Mallorca).

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OPEN AND COLLABORATIVE INNOVATION

ACCIONA Energía promotes a collaborative approach known as OPEN INNOVATION, in which it collaborates with public and private entities in three main fields:

01

Universities and technology or research centres

ACCIONA Energía collaborates with the major universities in the countries where it is present. The collaboration centres around renewable wind and solar technology.

This year’s special mention is the collaboration with the Polytechnic University of Madrid for developing a battery aging model carried out on the storage batteries of the Barasoain Experimental Plant in Spain.

02

Collaborating companies, major undertakings and other partners

Collaboration programmes and projects are established at the crossroads between our areas of technology interest and the areas of technology competition and developments of those partners. With SENER, programmes are being launched aimed at improving the safety of hydraulic infrastructures and also recycling waste from turbine blades. With Red Eléctrica de España and the HESStec *startup* development continues on a project for collaborating in the development and experimentation of new advanced features for integration in the grid of hybrid storage systems between batteries and ultra-capacitors.

Also worthy of mention is the agreement reached with the Pontificia Catholic University of Chile for creating the ACCIONA Renewable Energies Chair, in which it cooperates with the University in the fields of skills and diffusion, with initiatives such as setting energy challenges for students and preparing and holding events and conferences on technology diffusion. For the company it involves forming closer links with the academic community and collaborating in solving business challenges.

03

Entrepreneurial ecosystem of startups

In addition to the programme for accelerating I´nnovation Startups, this year’s pilot projects or concept tests have been carried out with startups as EVX, Kemtecnia, Rated Power, Alerion, Place To Plug, BIA, BeePlanet, HessTec, 8-tree, Aistech, Detektia, Enging and Sympower. We collaborate in fields such as electric mobility, advanced photovoltaic plant design, automated inspections, AI models, Machine Learning, satellite imagery analysis and demand management.

One of the most noteworthy projects this year was the collaboration with BeePlanet, in which ACCIONA Energía has connected the first renewable storage plant in Spain to the grid with recycled batteries in its experimental photovoltaic plant in Tudela (Spain). The set of four second life electric vehicle batteries, with a combined capacity of 130 kWh, stores energy obtained from the 1.2 MWp plant to inject it into the grid and analyse its performance and behaviour.

AUTHENTICITY

This area of action arises with the aim of demonstrating that our commitment is genuine and that all members of the group are familiar with it and share it. The values are recognisable and are present in the company’s activities. The people of ACCIONA Energía recognise that the company’s management is trustworthy and credible, hold strong values and are committed to the project. The transformation levers to be activated are:

- › To redefine the company’s objective, promise and principles in a new Code of Conduct that has a broad participation as the basis of an ACCIONA Way Of Doing that is common to all its businesses.
- › To have quality and satisfaction indicators of the information for customers, investors, employees and suppliers, verified by independent third parties, which will promote annual improvement schemes.
- › To extend a common virtual meeting place that is accessible to all ACCIONA Energía personnel and the development of informal practitioner networks involving the company’s core commitments.
- › To establish processes for immersion in company values, especially in onboarding and in businesses with inherent turnover.
- › Schedule of rules on the company’s position regarding its commitment and defence of more sustainable development models.

CUSTOMERS

The prime objective of ACCIONA Energía is satisfying the needs and expectations of customers and users.

Long term agreements

There are three factors that make corporate purchasing of green energy a powerful tool for the transition to a decarbonised economy: the competitiveness of renewable technologies, the interest of companies in securing an energy supply at a stable price over time, and corporate climate change policies.

In 2021, ACCIONA Energía continued to reinforce its strategy of selling renewable energy to major corporate customers who wish to reduce their carbon footprint with new agreements for long-term renewable energy supply, known as Power Purchase Agreements (PPAs).

During the past year, 17 new long-term agreements of up to 15 years were signed with public and private customers in Mexico, Chile, Portugal, India and Australia.

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Customer satisfaction

Green Energy Developments, an ACCIONA Energía subsidiary, manages the sales to the electricity market of energy from 100% renewable sources produced in the plants belonging to the group. It also handles the sale of other separate renewable energy products which benefit from the technical abilities and experience of the group, adapted to the customers’ needs. Green Energy has a long history of selling energy in wholesale markets.

It also sells 100% CNMC certified renewable energy [National Markets and Competition Commission] to customers and advises them on the most suitable form of contracting the supply for the most optimum consumption. Amongst the associated services, it is worth mentioning the downloading of invoices and 24/7 telephone attention, or the possibility of consulting the consumption record and prices forecast. The company has a CRM system that manages customer relationships and contributes to providing an optimum service and follow-up. In 2021 a new initiative was put into operation, aimed at new customer segments such as SMEs, under the name “Iberia Empresa”. During the year invoices have been raised, extending the service to customers as well, responding to incidents and queries, and creating a business app for customers. The intentions for 2022 are to improve the method of invoicing, the customer web site and evaluation of satisfaction.

The most usual method of gathering information on satisfaction and/or experience with ACCIONA Energía’s products, services and projects are surveys. During 2021 a total of 3,990 consultations were made, with 494 responses received.

ACCIONA Energía receives constant high levels of satisfaction over time.

Evolution of satisfied customers

	2018	2019	2020	2021
Satisfied customers	100%	98%	99%	100%

IBERIA Empresa. Electricity sales for SMEs

In 2021, ACCIONA Energía opened a new business line for small and medium businesses (SMEs). The company has achieved 1,500 customers to whom it offers 100% renewable energy. An app has been put into operation to accompany the initiative. As a whole, it is a strategy for customer loyalty based on quality and contract performance in Spain as a company selling electricity to SMEs. Iberia Empresas respects the financial terms signed by customers in spite of the current prices situation on the electricity market, which cannot be said for the vast majority of our competitors and which has been highly valued in customer satisfaction levels.

The targets for improvement set for 2021 have been achieved in full in all business lines.

Targets for improvement 2021

Business line	Targets for improvement	Degree of progress
Solar farms	Explanatory sheet on bills Report on survey results	100 %
Chile	Strengthen the perception of customer service	100%
India	>90% customer satisfaction	100%
Marketing company for Portugal	Digital invoicing Web-based system for managing incidents Customer Service	100% Under way
Marketing company for SMEs Iberia	Creation APP	100%
ACCIONA ESCO	Improve results in satisfaction surveys Surveys in digital format. Change of digital tool to EMIOS	1100% Under way
CECOER	Two-monthly meetings with customers Improving the protocol for work coordination in sub-stations	100%

› Governance	64	‹ Authenticity	76
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ACCIONA Energía’s levels regarding the possibility of a customer contracting its services again remain above 85% for all businesses, except for the Marketing Company for SMEs Iberia where they dropped to 67%. Even so, it has a high level of contracting taken into account the type of business, as the wide range of marketing companies leads to dynamics of change and strong pressure in the sector. For all other segments, the ratings range between 86% and 100%, demonstrating progress in customer relations.



## ACCIONA Energía Chile

In 2021 the national electricity system suffered one of the driest hydrological years in history, which led to a Decree for Rationing being passed in July. In order to allay customers’ concerns regarding the new regulation, they were all called to a meeting in which the implications were explained and queries and doubts were collected, which were sent to the authorities. The idea was greatly appreciated by all the customers, and we will repeat this type of activity.

At the same time, ACCIONA Energía in Chile has a monthly reporting system for customers which includes a summary of the production process with performance figures for both electricity (kWh) and return (CLP), and also the main variables of the electric system. Through the Green Chain product, customers can also obtain the traceability of the energy produced.

### Complaints and claims handling

There were 160 B2B claims in 2021, with a 100% resolution rate in all business lines, except for the marketing company for Spain and SMEs, where the resolution rate remained at 87%. There were 31 B2C claims, all in Solar Farms, with a 100% resolution rate.

### Evolution of the claims

	2020	2021
<b>Business to Business (B2B)</b>		
No. of claims	341	160
B2B claims successfully closed (%)	97%	90%
<b>Business to Consumer (B2C)</b>		
No. of claims	41	31
B2C claims successfully closed (%)	100%	100%

The Solar business line has settled claims within an average of 24 hours. In the case of Mexico, complaints were settled within 2 or 3 days, while for the Marketing Company for Spain and SMEs, the average time was 10 days. In Portugal, the Marketing Company settled all claims in an average of 19.5 days and CECOER in 2 days.

### Product health and safety

One of the basic principles of the Quality Policy is to ensure the health and safety of 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, and is approved by senior management and at the disposal of all interested parties.

The Control Centre for Renewable Energy, CECOER, has adapted its processes to comply with CIP regulations (Cybersecurity in the Energy Sector) in USA and Canada. With this, a new infrastructure has been created in the Chicago control centre, monitoring users and access. Furthermore, a new app has begun to be used for improving safety in the management of electrical discharges in substations.

In Australia, the State of Victoria has passed a new regulation to minimise risks for health and the environment in all industries, including noise pollution from wind farms. In this aspect, compliance with current noise regulations continues to be guaranteed, and also a noise

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assessment is carried out once construction has concluded, within 12 months of the plant coming into operation. As from 1 January 2022, a noise management plan has begun to be applied, which also includes complaint management. The presentation of an annual statement is planned for July 2022 which sets out details of the actions for ensuring compliance. From 2024, ACCIONA Energía commits to monitor the noise every five years.

During 2021, no reports on non-compliance were received regarding customer health and safety.

Certified management systems

100% of the marketing and sale of renewable energy with guarantee of origin accredited by the Spanish National Energy Commission (CNE) and 100% of the certifiable MW installed are certified under ISO 9001 and ISO 14001. Similarly, 100% of the energy services activity is certified under ISO 50001.

As a new feature, in 2021, the ISO 9001 and ISO 14001 certificates were incorporated for ACCIONA Energía Ukraine. The energy services have also been included under the Scope of the certification.

Internal and external audits by both customers and certification authorities constitute one of the main tools for ACCIONA Energía for identifying opportunities for improvement.

In 2021, the company performed a total of 165 audits, 136 of which were internal and 29 external. The majority were made under ISO 9001 and 14001 certified management systems. In addition, 3 audits were received from customers in Mexico.

Personal data protection

ACCIONA Energía is committed to ensuring that its subsidiaries, and by extension, its whole value chain, act properly and with the highest standards of diligence with respect to the protection, processing and privacy of personal data.

In this respect, the Personal Data Protection Policy aims at setting out the company's goals in this matter and defining a working framework that makes it possible to guarantee and improve that protection, respecting the principles and rights established by applicable legislation. This guideline must be followed by all divisions and entities of the group, as well as their employees, suppliers, shareholders and customers who store or process personal data.

In 2021, the company performed a total of 165 audits, 136 of which were internal and 29 external

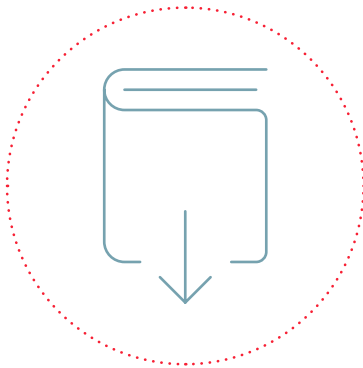
To guarantee adequate management of personal data protection, the following organisational structure is established at ACCIONA group level:

- > Data Protection Department. It reports to the Audit Committee, ensures application and compliance of applicable legislation.
- > Personal Data Protection Committee. This body is in charge of setting the guidelines for Personal Data Protection; defining short, medium and long term strategies; ensuring adequate risk management; and leading the data protection governance model.
- > Department for Information Technology and Communications. Responsible for implementing and managing the strategy in this matter and defining the measures to guarantee the protection of personal data.
- > Data Protection Officers in all organisational units, including ACCIONA Energía.

Non-compliance by the persons responsible for data protection measures will be penalised in accordance with the provisions for non-compliance in the workplace included in the Workers Statute or in the Collective Agreements applicable to each company, and following the procedures established therein.

ACCIONA Energía offers a data protection course which is compulsory for all company employees.

As part of the supply chain control mechanisms, ACCIONA Energía's suppliers have to accept the self-declaration document. This includes security aspects on information and personal data protection.





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RELATIONS WITH THE PUBLIC ADMINISTRATIONS AND REGULATORY BODIES

ACCIONA Energía 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. For this reason the company always defends an appropriate dialogue with the regulating authorities and, in turn, assumes a high degree of commitment to cooperate and be involved in that dialogue.

The organisation becomes involved in implementing public policies for the areas and sectors where it engages in business and collaborates responsibly and openly in defining the regulation and policies implemented by the various Public Administrations.

Under the terms of its Code of Conduct, ACCIONA Energía makes no financial contributions for political purposes, or for obtaining any favourable treatment. Nor does the company use sponsorship or donations for those purposes.

Within the Scope of the European Union, the parent company, ACCIONA, has been registered in the EU Transparency Register<sup>8</sup> since 2013. This is a transparent publication of what interests are being pursued, who defends them and with what budget, including information relating to ACCIONA Energía.

In 2021, it has contributed to numerous public hearing procedures and participated in the preparation of reports and position papers of various entities and associations, in support of the decarbonisation of the energy sector related to:

- › Promoting renewable hydrogen.
- › Developing offshore wind power and other energy from the sea in Spain, and maritime spatial planning.
- › Simplifying the formalities for renewable energy projects, including distributed generation and self-consumption.
- › Hybridisation of renewable energy technologies.
- › Development and improvement of operating procedures to enable better integration of renewable energy into the power grid and its input to the grid support services.
- › Extension of the life of renewable projects.
- › Proposals for creating regulatory sandboxes to facilitate the development of innovative projects and technology.

For the development of these policies, ACCIONA Energía participates in sectoral associations at regional and national level (for example, AEE, APPA and UNEF), and also at European level (such as WindEurope and CLG Europe) and internationally (GWEC). The company participates actively with them and holds positions of responsibility on their management bodies.

TRANSPARENCY

DIALOGUE AND SUSTAINABLE LEADERSHIP

ACCIONA Energía actively participates in the world’s most prestigious international initiatives in relation to sustainable development, the fight against climate change and ESG aspects.

ACCIONA Energía at COP 26

The 2021 summit took place in Glasgow, where governments, companies and organisations from all over the world came together to move forward with the global work programme to combat climate change.

The chairman of ACCIONA Energía, José Manuel Entrecañales Domecq, participated in the summit and was given the opportunity to present ACCIONA’s experience as part of the Next Frontier day event: Positive Impact beyond net-zero. The event focussed on the identification of trends once the zero emissions targets have been met and on how the regenerative approach of positive impact will be prioritised in the corporate strategies of the future.

ACCIONA Energía’s CEO, Rafael Mateo, was given the opportunity to present his experience in the use of tokenisation for renewable energies hand in hand with the Sustainable Energy for All initiative.

World Economic Forum (WEF)

As part of the Measuring Stakeholder Capitalism initiative of the WEF, the company participated in the debate that took place with John Berrigan, Director General of the Directorate-General for Financial Stability, Financial Services and Capital Markets Union of the European Commission (DG FISMA). The meeting focussed on the review of the European Commission proposal for the Corporate Sustainability Reporting Directive (CSRD), as well as on the recent proposal by the G7 Finance Ministers for the creation of a global reference standard in this respect.

ACCIONA Energía makes no financial contributions for political purposes, or for obtaining any favourable treatment

1	Letter from the Chairman
2	Only in renewables
3	Degree of fulfilment of commitments
4	People centric
5	Planet positive
6	Exponential leadership
7	Integrate to transform
8	Impact per region
9	Appendices

8. More information on: <https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=451019811573-55>



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United Nations Global Compact (UNGC)

ACCIONA Energía, as part of ACCIONA, has been a signatory of the United Nations Global Compact since 2005. It confirms its commitment to the Ten Principles of the Global Compact each year. The company regularly collaborates with the Spanish and Chilean Global Compact Networks and in 2021, also collaborated with the German network, participating in the Traceability in global supply and contracting chains programme

At the same time, ACCIONA Energía’s chairman participated in the High-Level Meeting of Caring for Climate summit, this year’s edition of which focussed on achieving the goal of zero emissions. In his speech he also shared his vision for the results of the summit, as well as the challenges.

Awards

In 2021, ACCIONA Energía was rewarded by the Finance for the Future Awards initiative, created by the ICAEW, in recognition of the launch of a dual-impact financing instrument (sustainability linked loans) worth €2,500 million, designed in an innovative way to maximise the social and environmental impact of the company’s operations.

Internal and external circulation of the sustainability principles and acknowledgements

During 2021, ACCIONA Energía actively participated in various forums, talks and work groups of various organisations, having also collaborated with drawing up publications and reports.

Specifically, in 2021, the chairman participated in the Tomorrow’s Capitalism Forum, where he had the opportunity to explain the reasoning behind the integration of the finance and sustainability departments and the unification of the audit and sustainability committees.

CYBERSECURITY

The 2022 Global Risks Report of the World Economic Forum positions cybersecurity failures as one of the most relevant threats in the short and medium-term.

At ACCIONA group level, there is a Cybersecurity Steering Committee comprising the Economic/Finance and Sustainability Director, Security Director, Technology and Processes Director, Human Resources Director and Cybersecurity Director. This committee is the body responsible for establishing a strategy and initiating, prioritising and managing the monitoring of security plans and programmes in a possible crisis situation that might be caused by any incident in relation to the security of the reporting or information systems. It also conducts the supervision of the security risks and problems, reporting to the Board of Directors.

The cybersecurity framework is based on the NIST standard, where all the processes and activities are defined under the supervision of the competent department. As part of this instrument, the company has a corporate information security policy and an employee awareness and training plan, in addition to procedures and mechanisms for any employee to be 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.

The group has established processes to prevent interruptions and cyber attacks on the computer system. There is a Contingency Plan that is reviewed and tested twice-yearly and which covers certain applications.

In 2021, the resources and capacities were increased, incorporating new positions into the workforce and deploying new security solutions and systems. In 2022, it is planned to increase the capacity for detection and resilience in the face of potential cyberattacks.

In 2021 there were no reported security incidents that compromised customers’ personal data or affected the operations of critical infrastructures.

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SUPPLY CHAIN

ACCIONA Energía is committed to leading the development of its supply chain, not only in terms of technology but particularly in social responsibility, ethics and transparency of the procurement process. The volatility of the price of raw materials means that maximum traceability of the distribution chain downstream of the direct suppliers is required.

Responsible procurement management

The strategy for supply chain management is mainly marked by the projects for the construction and operation of renewable energy facilities. The processes are integrated in the ERP, the supply management tool, and PROCUR-e, the tender and supplier management tool.

In 2021, a control unit was created to monitor and ensure that intragroup sales transactions comply with arms-length terms.

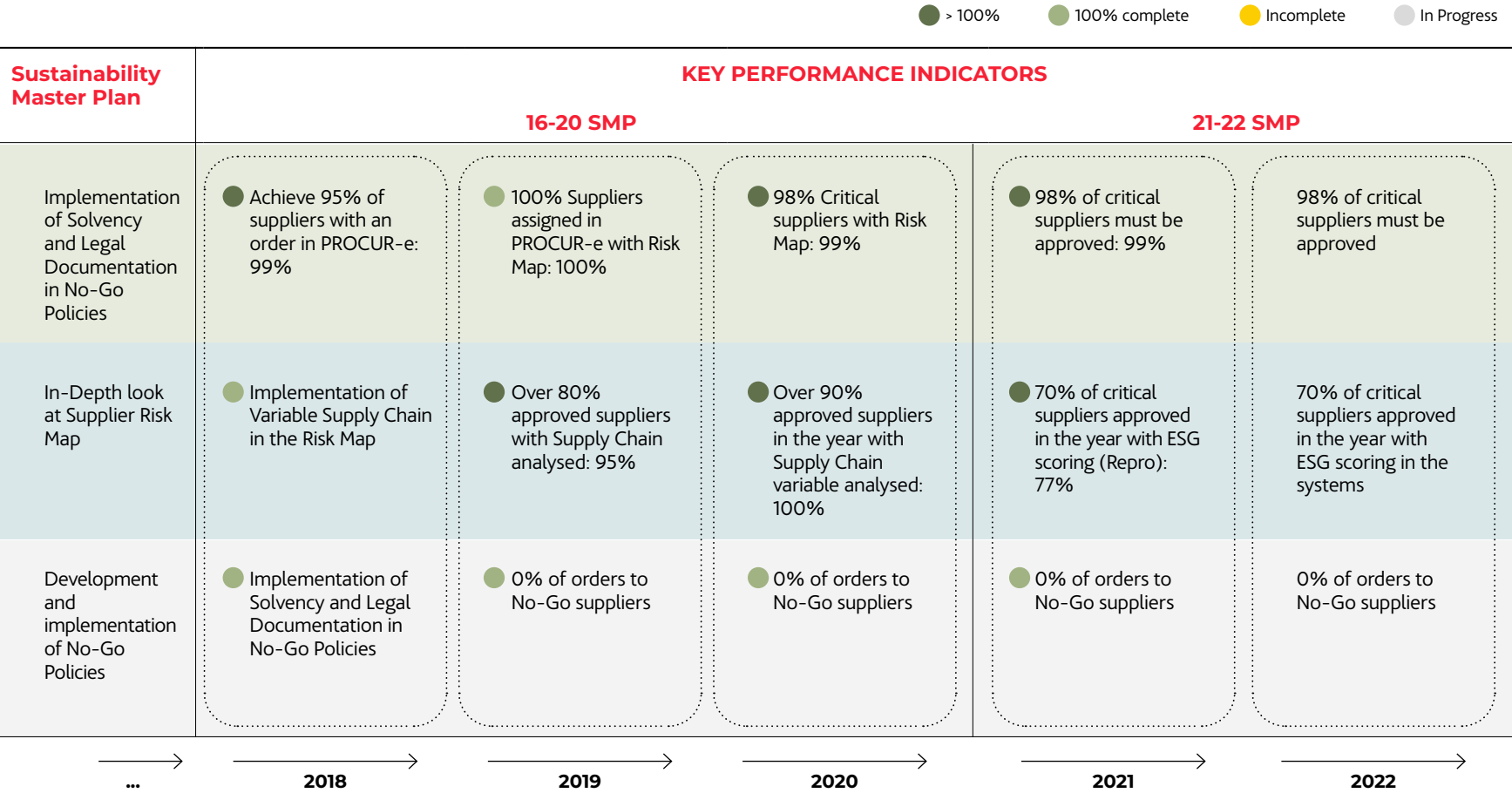
100% of employees in the purchases department have targets linked to the Sustainability Master Plan.

In addition, two initiatives have been developed in relation to supply chain greenhouse gas emissions:

- > Viability Study for alignment with Science Based Targets of suppliers and market prospection to assess whether there are alternatives that are lower in carbon. The conclusion is that the current purchases are below the average for the sector. A roadmap is established to guide suppliers along the path towards a reduction in emissions.
- > Analysis of circular economy in the supply of large components. The supplier network has been reviewed in relation to certifications and information provided by the suppliers in this area.

A Contractor web portal was set up for more transparent contracting in the European Union, with objective, measurable criteria that include aspects of sustainability.

Degree of fulfilment of the objectives of the supply chain



Challenges for 2022 in supply chain management

- > Implementation of the Go Supply supplier Management Portal for countries where Repro is not established, including both approval and technical qualification.
- > Extension of the use of the Contractor portal on a global scale.
- > Continuing with the Scope 3 initiatives begun in 2020: communication and awareness plan for critical suppliers and those with which ACCIONA Energía could collaborate in the reduction of its carbon footprint.
- > Tier 2 audits: to audit the suppliers of direct suppliers with equipment supply contracts worth more than €5M, supervising those that supply 80% of the contract.

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Distribution of suppliers by type

	Total no.	Outside Spain	Critical	Local
Suppliers	2,883	1,583	222	2,708

Critical suppliers

The level of criticality of suppliers and contractors is established mainly based on economic risk: any supplier with an annual commercial relationship worth more than €400,000 is considered as a key supplier. 7.7% of the supply chain has been estimated as falling within this category, accounting for 92% of contracting.

Local suppliers

Working with local suppliers has a positive effect on the economic development of the communities and minimises operating risk as delivery and execution times are reduced. 94% of the companies or means of distribution contracted are local.

Sector-specific characteristics of the supply chain

The group's purchase categories with a higher volume of expenditure are wind turbine components, photovoltaic panels and structures, and the maintenance of facilities in operation.

RISKS IN THE SUPPLY CHAIN

ACCIONA Energía recognises two types of risk associated with procurement processes:

- > Operating risk, such as interruptions in supplies.
- > Compliance, sustainability, environmental and social risk.

For each of these risks, specific preventive control mechanisms are periodically updated, configured and developed to help minimise the probability of occurrence.

The Risk Map is the main tool for the control and management of supply chain risk. Through this mechanism, the company informs the whole supply chain of its criteria and policies on the subject of corporate responsibility and sustainability. It is made up of eleven variables: ESG, ethics, integrity and governance, amongst others.

For critical suppliers, ACCIONA Energía has had the validation of the supplier information outsourced to Repro-Achilles since 2011. This company provides an ESG score and another score for compliance (including criminal, privacy and cybersecurity). Those scores are taken into account in tenders.

Supply Chain variable and non-Tier 1 suppliers

ACCIONA Energía has been using the Supply Chain variable for the purpose of verifying whether suppliers identify, control, assess and offer the capacity for improvement in their supply chain. 100% of suppliers we have worked with had the Supply Chain variable complete.

Likewise, non-Tier 1 suppliers who carry out work on their facilities and construction sites are monitored from the point of view of health and safety. This supervision is regulated through contractual clauses during the relationship with this type of supplier and the TDoc tools, which has allowed the review of a total of 1,942 non-Tier 1 distributors.

Human rights assessment

The company assumes the responsibility of identifying, preventing, mitigating and answering for the negative impact of its activities on human rights and is therefore committed to conducting due diligence on its suppliers. In 2021, ACCIONA Energía assessed 715 companies in terms of HR through its Risk Map.

ACCIONA Energía establishes different mechanisms to prevent and control the risk of HR violations:

- > Supplier Self-Declaration of Responsibility which includes, amongst other things, the Ethical Principles for Suppliers, Contractors and Employees.
- > Self-assessment questionnaire on the subject of CR, in which companies respond to the questions in relation to international standards by filling in the questionnaire.
- > Help sheets that suppliers can access when they fill in the questionnaire. The purpose of these sheets is to inform, raise awareness and educate on the subject of human rights.
- > Risk Map with the “Country Risk” variable, made up of various indexes extracted from Maplecroft and linked to various factors: child labour, freedom of association and collective bargaining, forced labour, decent working hours, fair minimum wage and discriminatory practices. Countries that obtain low scores are considered high risk and are audited.

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Focus on the Integrity variable

The “Integrity” variable analyses the supplier’s position with respect to matters like money laundering, tax havens, corruption lawsuits, presence on international sanction lists, etc.

2021 ended with 715 suppliers with this variable under monitoring. ACCIONA Energía supervises the most important companies, either for reasons of approval, due to being amongst its main agents, or because they are recurrent, work in a risk country, etc.

4 Reinforced Due Diligence processes were carried out in 2021, thus mitigating the Integrity risk represented by these suppliers, who were able to maintain their collaboration with ACCIONA Energía.



No-Go Suppliers

Failure to comply with the minimums established in the No-Go Policies means that a supplier cannot be contracted until they resolve the underlying cause of this situation. ACCIONA Energía has met its 2021 target of 0% general purchase orders to companies with this status.

The No-Go Policies include the following situations:

- › Suppliers with significant ethical and integrity risk, either because they are on international sanction lists or because they exhibit serious signs of corruption, fraud or money laundering.
- › Critical suppliers in risk countries without auditing, or with auditing and one or more unresolved Serious Non-Conformities.
- › Demonstrated non-compliance with the United Nations Global Compact.
- › Risk of economic solvency (from €1 M of contracting).
- › Debts with the Social Security Institute or Tax Authorities.
- › Companies penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

In 2021, 19 suppliers were considered No Go, of which 7 have left this category following the performing of an audit, action plans or improvement, or Reinforced Due Diligence.

SUPPLY CHAIN CONTROLS

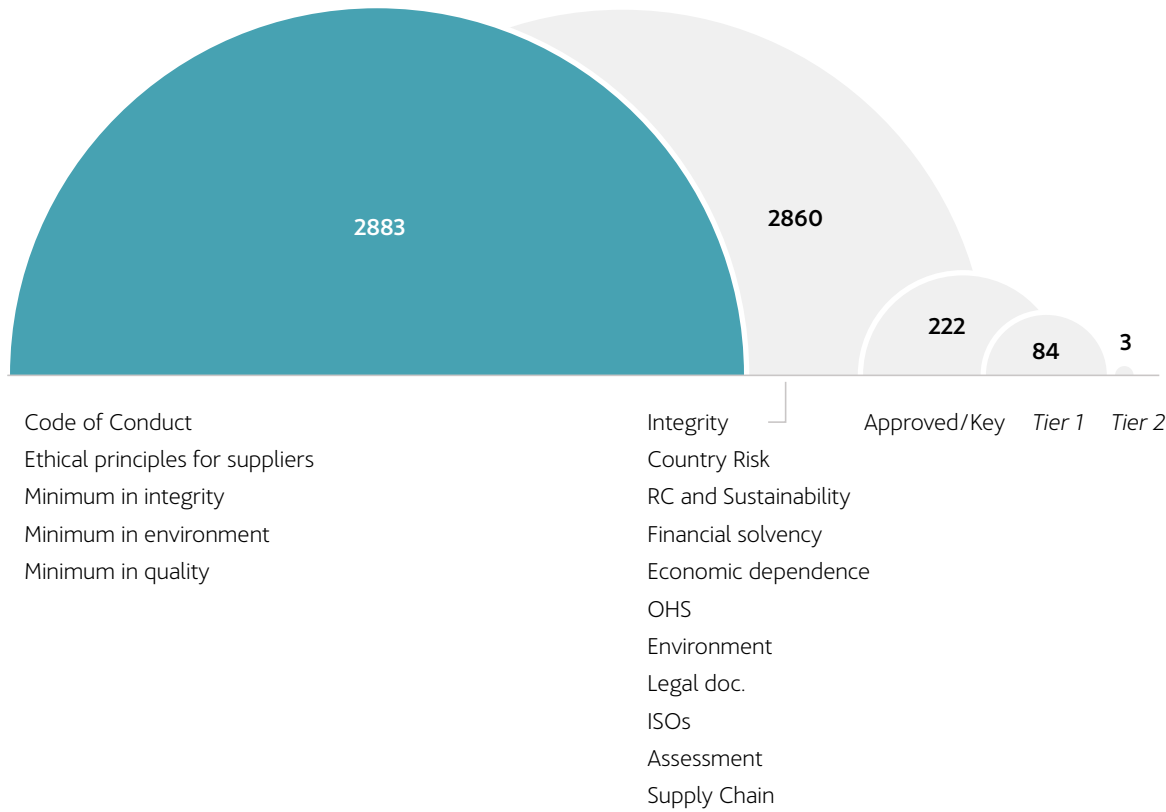
Supply chain controls are defined by levels of criticality, i.e., they become more exhaustive as risks of any kind increase, whether economic, country, activity and sustainability. The levels are:

- 01
- Suppliers must accept the group’s Self-Declaration document.
- 02
- To participate in tenders, associates must fill in the self-assessment questionnaire in PROCUR-e.
- 03
- In order to be awarded contracts higher than the accumulative amount of €400,000 (those considered critical suppliers), an additional control is required.
- 04
- Finally, the highest level is aimed at critical suppliers in risk countries for which social audits and audits regarding regulatory compliance with ACCIONA Energía’s Audit Protocol are carried out.
- 05
- Additionally, audits of Tier 2 suppliers have been established with the criteria indicated previously.

Integrity analyses and monitoring of No-Go Policies are common at all levels, regardless of the criticality.

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Supply chain controls



Supply chain controls are defined by levels of criticality

ESG EVALUATION IN AUDITS

Improvement plans for the qualification process

In 2021, six suppliers that required qualification showed poor performance in OHS but achieved approval after receiving training from ACCIONA Energía’s OHS department and/or signing up to improvement plans.

Supplier performance assessment

In 2021, assessment of suppliers continued according to criteria in relation to periods, occupational health and safety, quality, environment, fulfilling of administrative obligations and technical skills. More than 638 assessments have been carried out. 93% of those evaluations were type A or B (very recommendable or recommendable supplier).

ENVIRONMENTAL, LABOUR AND SOCIAL ASSESSMENT OF SUPPLIERS AND AUDITS

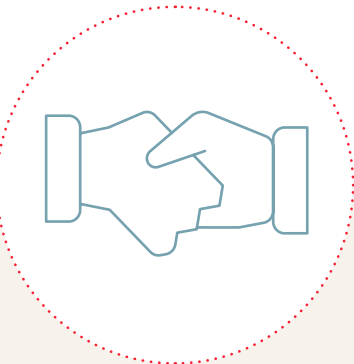
The Risk Map assesses suppliers in relation to ESG criteria: environmental, social, human rights, ethics and integrity and governance. This assessment is verified in the approval and audit processes.

External audits

The group has been carrying out annual ESG audits of suppliers since 2013. Last year, 87 audits were carried out: 83 of direct suppliers that, due to their strategic nature, could imply a risk for the business, 1 of a critical supplier from a risk country (China), and 3 of *non-Tier 1* suppliers, all from risk countries.

ACCIONA Energía believes that *Tier 2* audits guarantee its supply chain, as they provide more in-depth information on the suppliers and allow the mitigation of risks. At the close of 2021, the company launched (through three *Tier 1* strategic suppliers) a total of 29 audits of *Tier 2* suppliers, of which three audits of *Tier 2* suppliers in China have already been completed. This initiative will be concluded during 2022.

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## Resolution of serious non-conformities

ACCIONA Energía works together with its suppliers to resolve Serious Non-Conformities (SNCs) detected in the audits. In the event that the deficiencies detected cannot be resolved within a reasonable period of time, the company is marked as No-Go. This contributes to significantly minimising supply chain risks.

Focussing on the Non-Conformities of the 87 suppliers audited in 2021, the following is worth noting:

- > 56% had 0 SNCs.
- > The remaining 44% signed up for the various action plans. Of this percentage, 55% have totally resolved their SNCs and the rest have not yet reached the deadline or have been marked as No-Go.

As regards to suppliers from risk countries, the three *Tier 2* suppliers audited and the direct supplier with high country risk have been taken into account:

- > 100% had zero SNCs, so it was not necessary to implement any action plan to resolve the situation.

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. Working with suppliers that meet the standards contributes to improving performance and generating shared value.

## ETHICS FOR HIRING SUPPLIERS, CONTRACTORS AND COLLABORATORS

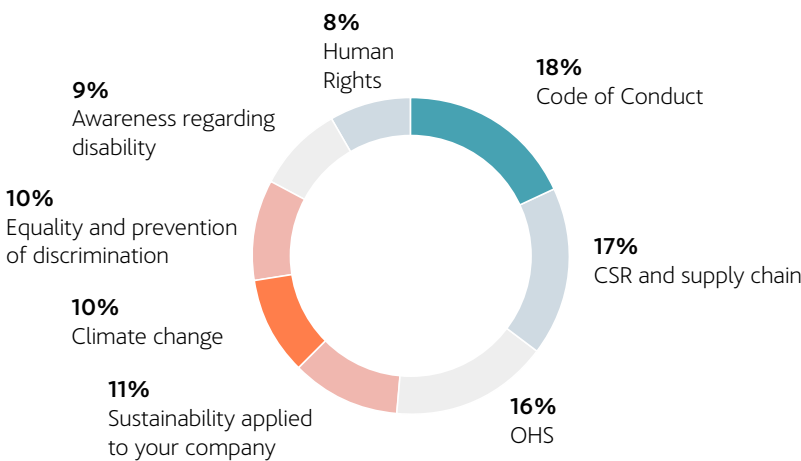
ACCIONA Energía considers communicating the company's Ethical Principles to its supply chain to be a key aspect for consolidating a network of suppliers, contractors and collaborators in line with its corporate values. This communication takes place through various channels: (i) acceptance of the Supplier Self-Declaration of Responsibility, (ii) through orders, contracts and tender specifications, incorporating clauses in relation to: Ethical principles for suppliers, sustainable procurement, confidentiality, information security and data protection. 94% of the group's orders incorporated these clauses, whilst the remaining 6% are orders for spare parts or the movement of materials between ACCIONA Energía companies.

## TRAINING AND COMMUNICATION WITH SUPPLIERS

The Corporate University Supplier Campus is integrated into PROCUR-e, available free of charge to 100% of the supply chain. Throughout the last financial year, 201 suppliers (7% of the total contracted), attended 983 courses out of those offered on the campus. The courses that have generated the most interest are:

- > Occupational Health and Safety (OHS): allowing suppliers to acquire the necessary tools to mitigate risk in this area.
- > Code of Conduct: suppliers learn the basic concepts of rules and how to apply them internally.
- > CSR: helping to better understand Corporate Social Responsibility.

### Training of suppliers in 2021





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Communication with suppliers

Suppliers have two-way channels to raise matters in relation to their commercial relationship with ACCIONA Energía:

Provedores.Energía@acciona.es, and Suppliers.Energy@acciona.com

Likewise, suppliers can make use of the Ethics Channel to report any irregular practice detected, which will be duly analysed by the company. <https://canaletico.acciona.com/>

ACCIONA Energía has participated in the programme called “Mide Lo Que Importa” (Measure What’s Important), especially designed to promote awareness and accompany selected SMEs in the knowledge, measurement and improvement of their sustainability. In collaboration with one of the leading companies on this matter, the programme was offered to more than 500 Spanish companies that work with the group. It is estimated that 60 companies will complete it in early 2022.

At the same time, ACCIONA Energía has incorporated information in relation to approval and technical qualification into the Contractor Profile. Specifically, suppliers will be able to see their Repro ESG score and their PROCUR-e OHS risk, in addition to their technical qualification in the areas of quality, OHS and environment in the categories that apply.

SUPPLY OF SUSTAINABLE PRODUCTS

ACCIONA Energía has updated the criteria of the Sustainable Procurement Guide. Sustainable purchases in 2021 amounted to €41,672,467.

Since the last financial year, ESG score accounts for 10% of the score for the awarding of tenders with a budget of over €400,000 (except in the United States and Australia). The specific score in OHS accounts for 20% in the case of the contracting of services.



Second edition of the Energy Supplier Award

In the second edition, acknowledgements were awarded to two suppliers in projects in the construction phase: one for product (Best Product Supplier Award) and another for service (Best Service Supplier Award). Based on an excellent assessment (type “A” suppliers - very recommendable), the following criteria were assessed, all with an explicit element of sustainability: occupational health and safety, excellence in execution, active seeking of solutions, competitiveness of products and/or services and collaboration in management and innovation.

Sustainability criteria in procurement and contracting management

Renewable materials	Orders were made with 124 suppliers of herbaceous waste in the amount of €18 million. Repair orders were made instead of the purchasing of new products with 96 suppliers for a total amount of € 20.9 million. With regard to energy efficient products, orders were made with 10 suppliers in the amount of €1.7 M. Other sustainable products were ordered with 69 suppliers in the amount of €0.8 M.
Contracting with Special Employment Centres	The contracts with 4 Special Employment Centres promote the incorporation of disabled people into the labour market. The expense amounted to € 300,000 during the year.
Fair wages	In Chile, we have promoted the creation of a minimum wage with equality between men and women called a fair wage. The minimum salary in Chile is € 338 and the poverty threshold for a household with 4 members is €448. ACCIONA Energía has established a basic monthly fair wage for its supply chain of €560.

1

Letter from  
the Chairman

2

Only in  
renewables

3

Degree of  
fulfilment of  
commitments

4

People  
centric

5

Planet  
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6

Exponential  
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7

**Integrate to  
transform**

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Impact  
per region

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# INTEGRATE TO TRANSFORM

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# CONNECT TO IMPACT DIFFERENCE IN EVERY PROJECT

ACCIONA Energía has the capacity to create a unique sustainable difference with a portfolio of solutions perfectly aligned with sustainable transformation.

	Responsible	Resilient	Regenerative	
Solutions based approach	Excellence	Innovation	Transformation	The value proposition is based on integrated infrastructures designed to maximise their contribution to the Sustainable Development Goals
Sustainable difference in every project	Minimum impact	Programmes with the community	Visible difference	The sustainable difference of ACCIONA Energía is evident in each project
Regenerative ecosystems	Participate	Propose and lead initiatives	Co-create with clients	To develop an ecosystem of organisations capable of increasing our capacity for regenerative transformation
Financing Impact	Measure impacts	Offer options	Develop adjacent projects	To maximise the capacity of sustainable finances to enhance the company's value and the competitive regenerating advantages of projects



## KEY MILESTONES 2021

- > Improved socio-economic impact analysis of 41 projects.
- > 13% increase in the number of projects with Social Impact Management.
- > More than €3.2 million and 500,000 people benefiting from social initiatives.
- > Launch of the first inaugural bond for €500 million.
- > Pioneer funding of €2,500 million under the ESG “double impact” scheme.
- > Best ESG score of the electricity sector from S&P Global Ratings.



## MAIN CHALLENGES 2022

- > Renew the Social Impact Management process: SIM+.
- > Implement ESG assessment process for projects.
- > Create a “regenerative playbook” to promote employee awareness of the regenerative component.
- > Involve employees in the creation of local trust ecosystems through project volunteering.
- > Developing experiences that aim to create competitive advantages through sustainable financing or adjacent projects financed by multilateral entities.
- > Positioning the company in the sector’s Tier 1 in the main ESG ratings.

◀ Solutions based approach	90	▶ Local ecosystems	93
▶ Sustainable difference in every project	91	▶ Impact funding	97

SOLUTIONS BASED APPROACH

The value proposition for this area of the Sustainability Master Plan 2025 is based on boosting the integrated infrastructures to maximise their contribution to the Sustainable Development Goals. The various departments of the company work together to design and offer their customers solutions that advance the achievement of the SDGs to the greatest possible extent.

INCORPORATION OF DISTINCTIVE SOCIAL CAPACITIES INTO THE PROJECTS: SIM+

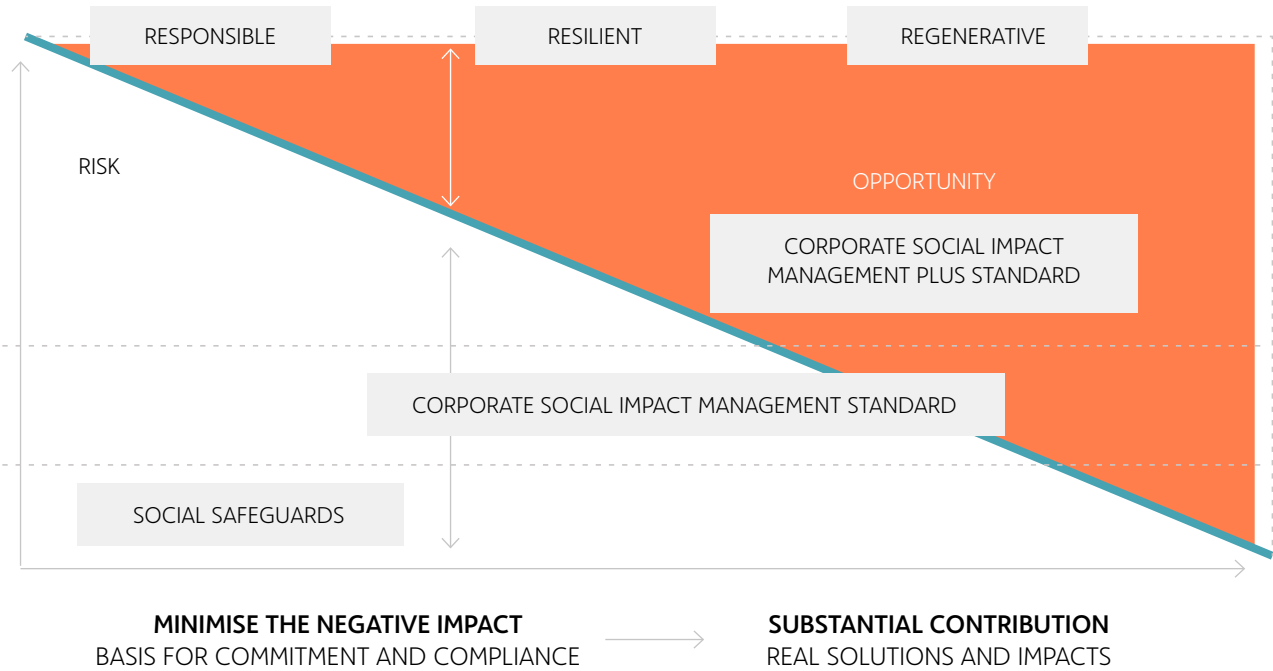
ACCIONA Energía aims at developing analysis and diagnostic tools that assists in the identification of regenerative opportunities, with the incorporation of local assessment of SDG compliance, in order to design solutions that will have a positive impact on a larger number of sustainable variables. The company is incorporating the analysis and coordination of differential sustainable capacities into the project design and management process, from the opportunity stage through to implementation.

In 2021, the company has been working on the evolution of the Social Impact Management (SIM) methodology towards the SIM+ system, in order to implement differentiated measures for effectively reducing risk and enhancing the regenerative impact on the projects. In 2022, work will progress with:

- > The development of analysis and diagnostic tools that allow for the identification of regenerative opportunities, with the aim of increasing the positive social impact of the projects.
- > The deployment of an integrated social safeguards risk assessment and compliance management system for the entire project process, complemented by a social safeguards audit system for all high-risk projects.

In 2021, the company has been working on the evolution of the Social Impact Management (SIM) methodology towards the SIM+ system

Evolution of the social management towards the regenerative approach



MEASURING SOCIO-ECONOMIC IMPACT

Since 2015, ACCIONA has been measuring the socio-economic and environmental impact of its projects in different countries, in order to understand and enhance the benefits they generate throughout their life cycle. Using an econometric model based on input-output tables representing the relationship of purchase and sales between the various economic sectors in the region, the company obtains specific figures on the direct, indirect and induced impact of its activity in terms of job creation and contribution to the country's gross domestic product. It also identifies other positive effects on the environment and communities.

During the year, the Institute of Economic and Social Analysis of the University of Alcalá de Henares reviewed the calculation model and expanded it with the tables from the National Institute of Statistics. In addition, it has incorporated the measurement of new indicators which provide added value, such as the impact on the national trade balance of imports and exports associated to the cumulative effect of the projects.

In 2021, a socio-economic impact analysis was made for 41 projects. From these, 19 socio-economic impact reports have been drawn up which were included in different offers, negotiations and auctions, and also in response to requests from regulatory bodies and clients.

› Solutions based approach	90	› Local ecosystems	93
› Sustainable difference in every project	91	› Impact funding	97



› **Socio-economic and environmental impact of the Sangüesa Biomass Plant (Spain)**

This 30 MW facility is contributing significantly to economic growth, job creation and environmental improvements in the following ways:

- › Contribution to the GDP: €515 million.
- › Job creation: 705 direct, indirect and induced jobs over the whole life cycle of the project. 101 self-employed workers and SMEs consolidated in rural areas, over 2,000 farmers involved, and more than 10,000 trucks a year supplying the plant.
- › Emissions avoided: 88,840 tCO<sub>2</sub> per year, equivalent to the effect of nearly 4.5 times the Irati Forest and the consumption of 41,480 cars during one year.
- › The biomass is supplied from 80,000 ha, minimising the fire risk.
- › The transport of 16,000 tonnes a year of waste to the tip is avoided, and it is recycled as fertilizers.

› **Socio-economic and environmental impact on the Aldoga photovoltaic plant (Australia)**

This 600 MWp plant has the following benefits on the economy, the people and the planet:

- › Contribution to the GDP: AUD 837 million, equivalent to the GDP per capita of 12,891 Australians.
- › Job creation: 848 direct, indirect and induced jobs over the whole life cycle of the project.; equivalent to a 0.01 point reduction of the unemployment rate of Queensland.
- › Emissions avoided: 1,232,530 tCO<sub>2</sub> per year, equivalent to 5 times the effect of the Daintree National Park and to withdrawing 268,050 cars from circulation during the entire life cycle of the project.
- › Water saved: 2,518,072 m<sup>3</sup> of water per year, equivalent to 1,007 Olympic swimming pools.
- › Improvement of air quality: 11,424 tonnes of SO<sub>2</sub> and NOx avoided per year, which translates as savings in medical costs associated to respiratory diseases amounting to AUD 22.4 million.

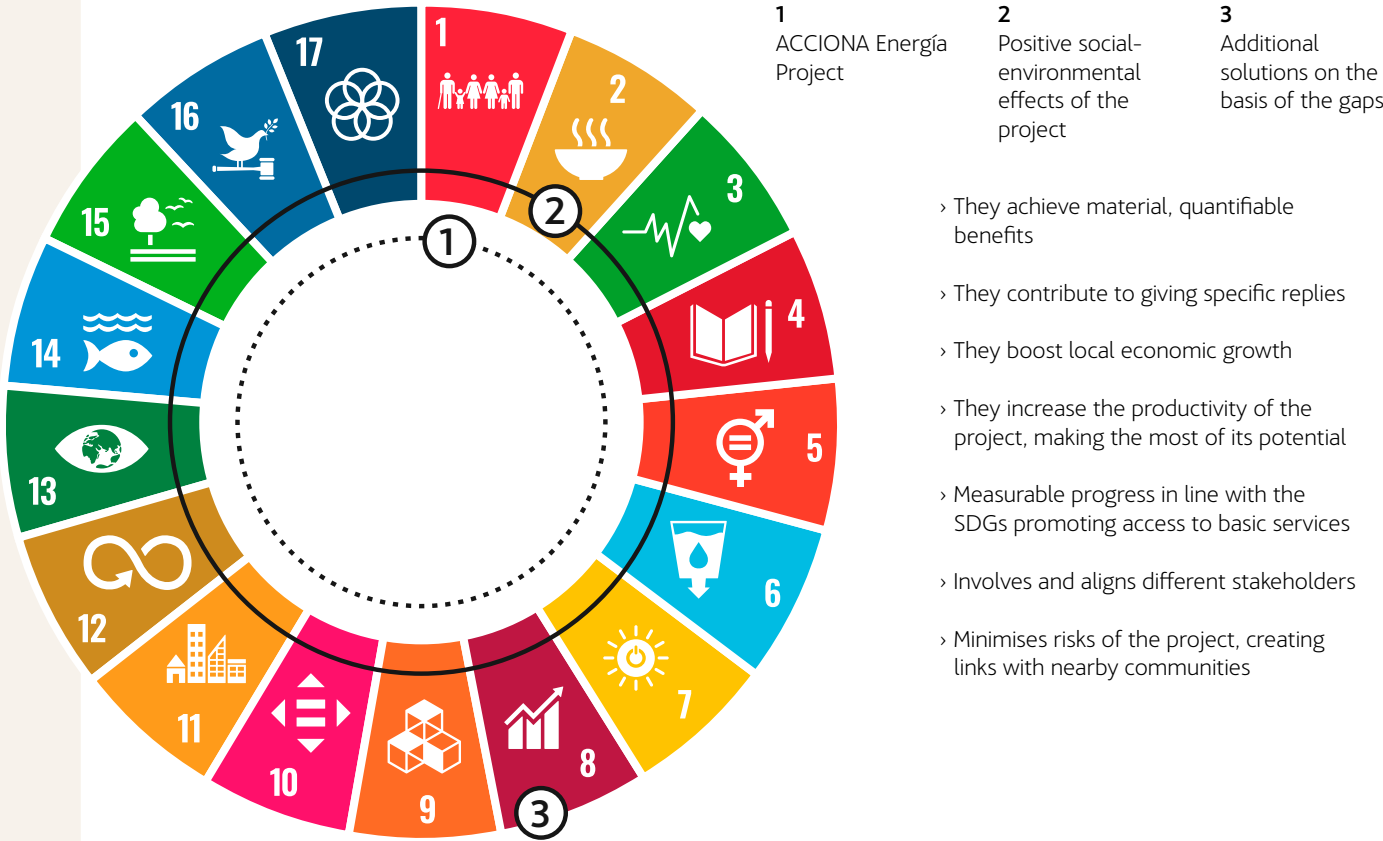
**SUSTAINABLE DIFFERENCE IN EVERY PROJECT**

The company aims to demonstrate the sustainable difference in each activity it undertakes. The business lines, and particularly the projects, develop their own distinctive identity during their execution. These identities are typically of a regenerative and sustainable nature, which are recognisable by third parties.

**HIGH IMPACT SOLUTIONS**

ACCIONA Energía 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 inclusion of adjacent projects, contribute to improving the living conditions of the population and/or the environment in the vicinity of the company's operations.

**Benefits of High Impact Solutions**



› Solutions based approach	90	› Local ecosystems	93
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The development of renewable energy infrastructure is directly or indirectly linked to the achievement of the Sustainable Development Goals. In fact, the company’s High Impact Solutions approach helps to channel the necessary investment towards projects that promote the global sustainability agenda. ACCIONA Energía 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 benefits, in order to promote inclusive economic growth integrated with the environment. Additional projects are designed to provide a sustainable service over time, either through their development as new business models or through collaboration with third parties to ensure their long-term operation and maintenance.

Work tools

In order to implement 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 these solutions, ACCIONA Energía 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.
- › Working teams: these integrate the sustainability function, the research areas, the local teams for each project and the innovation function. 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.

High Impact Solution Methodology

ACCIONA Energía 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	Letter from the Chairman
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2	Only in renewables
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3	Degree of fulfilment of commitments
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4	People centric
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5	Planet positive
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6	Exponential leadership
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7	Integrate to transform
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8	Impact per region
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9	Appendices
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LOCAL ECOSYSTEMS

The goal is to develop an ecosystem of organisations capable of increasing our capacity for regenerative transformation. Conversations will be held with third parties for establishing work schedules, initiatives and cooperation projects that will make it possible to multiply the company’s capacity for developing or improving regenerative solutions, with the aim of accelerating the achievement of the Sustainable Development Goals.

SOCIAL IMPACT MANAGEMENT

ACCIONA Energía’s management of the social impact of its projects and services is a strategic component of its business model. More than 10 years ago, the company set itself the task of going beyond legal and contractual requirements and gaining a deeper understanding of the social footprint of its activities throughout their lifecycle, with the ultimate aim of increasing positive social impacts and reducing negative impacts as much as possible.

To this end, ACCIONA Energía has its own social impact management methodology, based on international standards<sup>9</sup>, the implementation of which is a cross-cutting responsibility within the organisation. Its implementation is headed by the social department and involves the business development and studies departments, the project or service managers, and the environment, prevention and sustainability departments.

The development of the projects generates numerous positive impacts, including the hiring of local personnel, acquisition of goods and services in the area of influence, training of workers, increased income for employees, and improved street access, among others. However, the company’s activity can also generate adverse effects, such as interruption of supplies to communities, harm to vulnerable groups, temporary cuts in transport routes or alterations in local prices. ACCIONA Energía’s methodology makes it possible to anticipate the identification, evaluation and management of these impacts

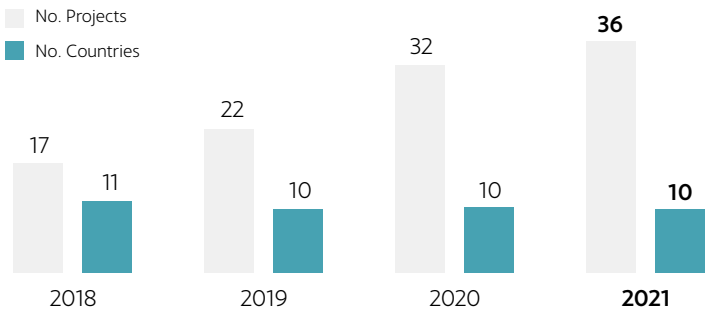
In 2021, the conducting of social pre-feasibility studies was included in the methodology. This type of study is intended to deepen and broaden the knowledge and understanding of the local communities where a project will be located in its initial stages. To that end, the company identifies and describes any potential stakeholders in its area of influence, and also determines and evaluates in advance any potential risks and social impacts with a focus on human rights associated to the construction and operating management of the project. This preliminary report is part of a broader process of studying the social impact of the projects that are carried out once the project development is more advanced; the purpose of this is to take a closer look at the identification, verification and evaluation of the potential social impacts through a participatory consultative process with stakeholder representatives. The pre-feasibility study serves as a mechanism for the ex-ante analysis of the social impact of a project and, as such, it should be considered as a tool in decision-making processes regarding the appropriateness of proceeding with a project. It also acts as a key source of data and information on the process of continuous management of the social environments during the whole course of its development.

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.

During the year, the company has applied the SIM methodology in 36 facilities in 10 countries, 10 in the construction phase and 26 in the operation and maintenance phase. Furthermore, a total of 168 social initiatives have been implemented in 13 countries.

In line with the Equator Principles, ACCIONA Energía has complaints collection mechanisms for communities and other stakeholders, specific communications channels for all its projects - such as community meetings, telephones, mails and physical suggestions boxes - and a public form on its web site for individuals or groups wishing to submit queries and/or suggestions in relation to any project, called the Ethical Channel.

Evolution of the implementation of Social Impact Management (SIM) methods

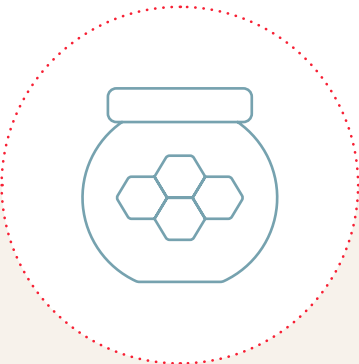


Methodology stages

- › Characterization of social risk: study of the degree of social risk of the project from the design phase and tender stage.
- › Social assessment of the project: analysis of the socio-demographic characteristics of the area of influence of the project, identification and assessment of positive and negative social impacts, and preparation of a proposal for social measures.
- › Communication and dialogue with local communities and other stakeholders about the project, its main impacts, and social measures to be carried out. Depending on the type of infrastructure, specific communication or dialogue channels are established to provide information about the project, its main effects, and the social actions to be carried out.
- › Implementation and monitoring of the identified measures, in order to enhance positive social impacts and avoid and mitigate negative impacts.

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› **ACCIONA Energía promotes the development of business and employment by producing honey in Northern Cape (South Africa)**

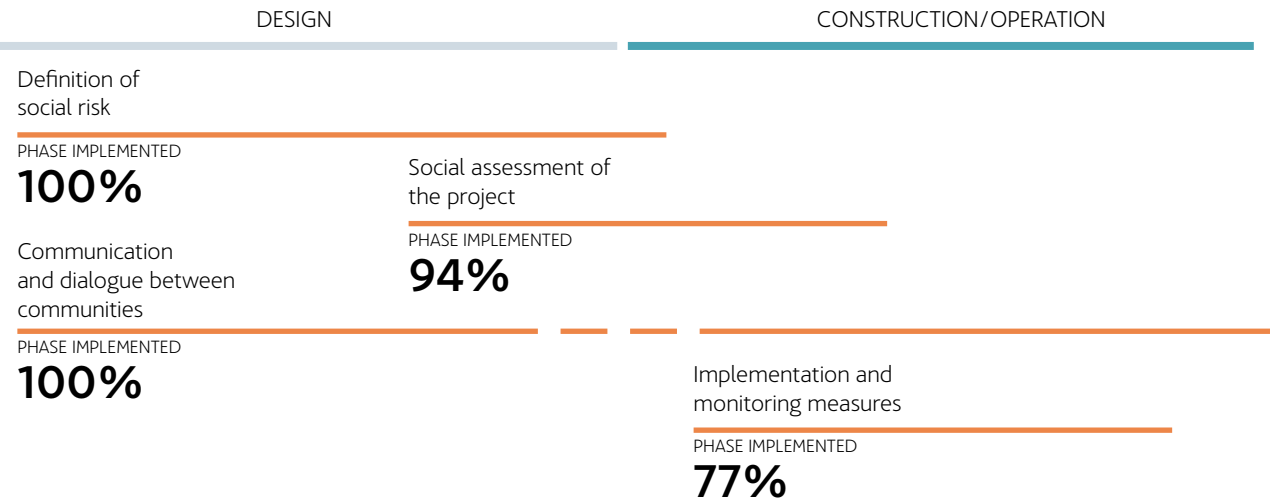
ACCIONA Energía has put into operation the Northern Cape Honey Farmer Incubator sustainable enterprise programme for producing honey, with the aim of reactivating the local economy of the most disadvantaged communities in the vicinity of the Sishen photovoltaic plant. With this project, it has been possible to train 77 new bee-keepers to operate independently as SMEs with their own beehives. It is estimated that the manufacture and the subsequent honey sales will create 105 jobs, 18 primary agricultural cooperatives, a storage tank and a bottling plant.

As a result of this initiative, it is estimated that around 15 million rand will be earned every year (close to a million euros) so the investment made will continue for a further two or three years until the process becomes self-sustaining.

› **Promoting a local circular economy through training in pallet reuse (Chile)**

ACCIONA Energía, in collaboration with the University of Chile, continues with the circular economy project as the essential basis for the sustainable development of the Diego de Almagro Community in the vicinity of the Almeyda and Malgarida II photovoltaic plants in Chile. Nearly 300 people have benefitted this year from the programmes which build up skills and train participants in the revaluation of waste and the generation of new products. To date, various items of furniture, urban vegetable gardens and shade structures have been built.

**Phases of SIM methodology and status of implementation  
(% of the total projects with SIM)**



**Audits**

External audits assess the degree of application of the Social Impact Management methodology, so as to identify and show the positive or negative social impacts, whether real or potential, resulting from operating certain projects.

The Scope of the audits 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’s Guiding Principles on business and human rights and the fundamental ILO Conventions.
- › Analysis of the *Guide to Human Rights Impact Assessment and Management*<sup>10</sup> to ascertain the potential and/or existing risks and impacts of human rights in the projects, and to determine the ability to management them.
- › Analysis of all project phases in order to prioritise and allocate the possible social impacts depending on their stages of development.

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.

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In 2021 the Scope was broadened with the following criteria:

- › Analysis of accident rate and environmental data reporting, in order to reviewing data collection, calculation and consolidation at project level.

Since 2017, ACCIONA Energía performs two audits per year. This year audits were conducted on the El Cabrito and Celada Fusion wind farms in Spain.

They concluded that the methodology is being implemented correctly in each of the phases. In 2021, we have focused on improving the evidence and measuring the impacts contributing to the control of social safeguards through specific training. The proposal, implementation and monitoring of the social measures associated to the different SDGs minimises the risk while also helping evolve towards the High Impact Solutions model.

COMMITMENT TO THE COMMUNITY

ACCIONA Energía understands that it has to be a major player in the economic development of the communities in the countries where it operates and is therefore committed to making contributions that improve the quality of people’s lives. This commitment has translated into the following results:

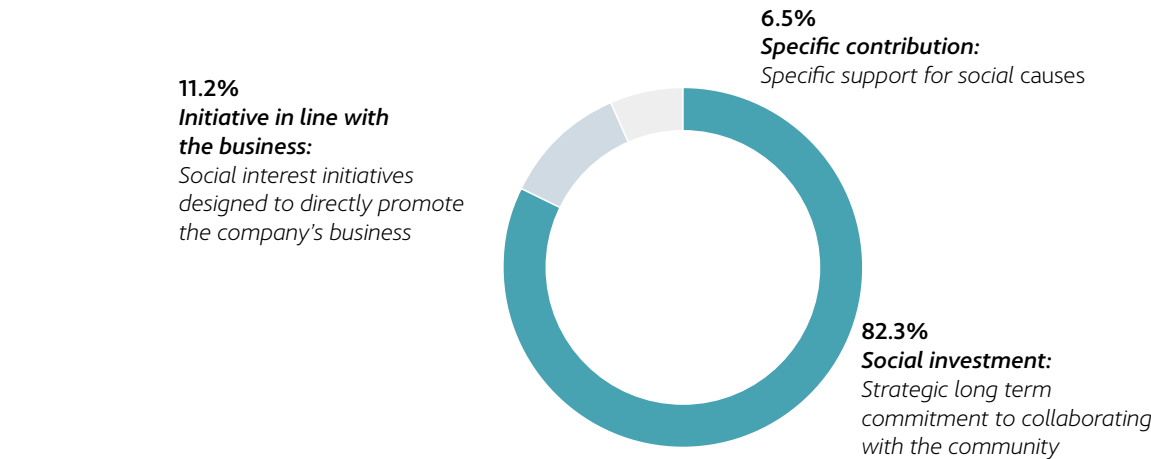
- › Over €3.2 million in social contributions to the community.
- › More than 500,000 people have benefited from the various social initiatives carried out.

These activities, implemented in over 13 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.

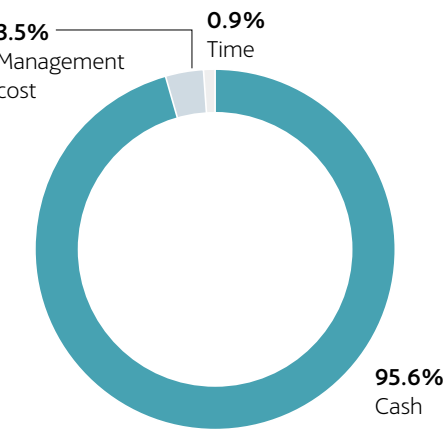
Measuring investment in the community

ACCIONA Energía measures and evaluates its investment in the community and the degree to which it contributes to the 17 Sustainable Development Goals, which allows for an overview and comparison of results with other companies.

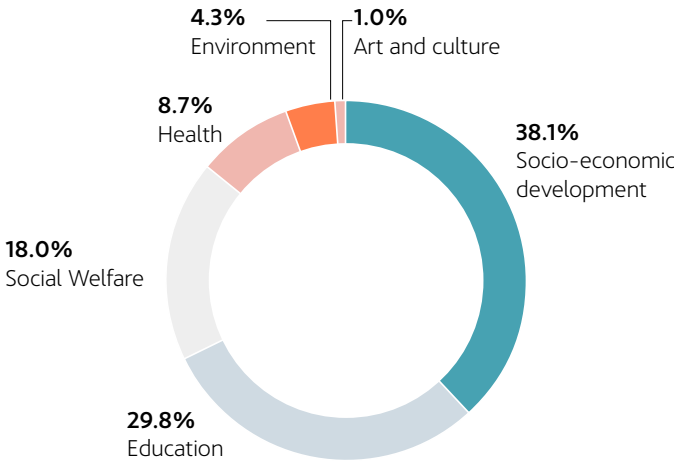
Motivation of the initiatives



Type of contribution



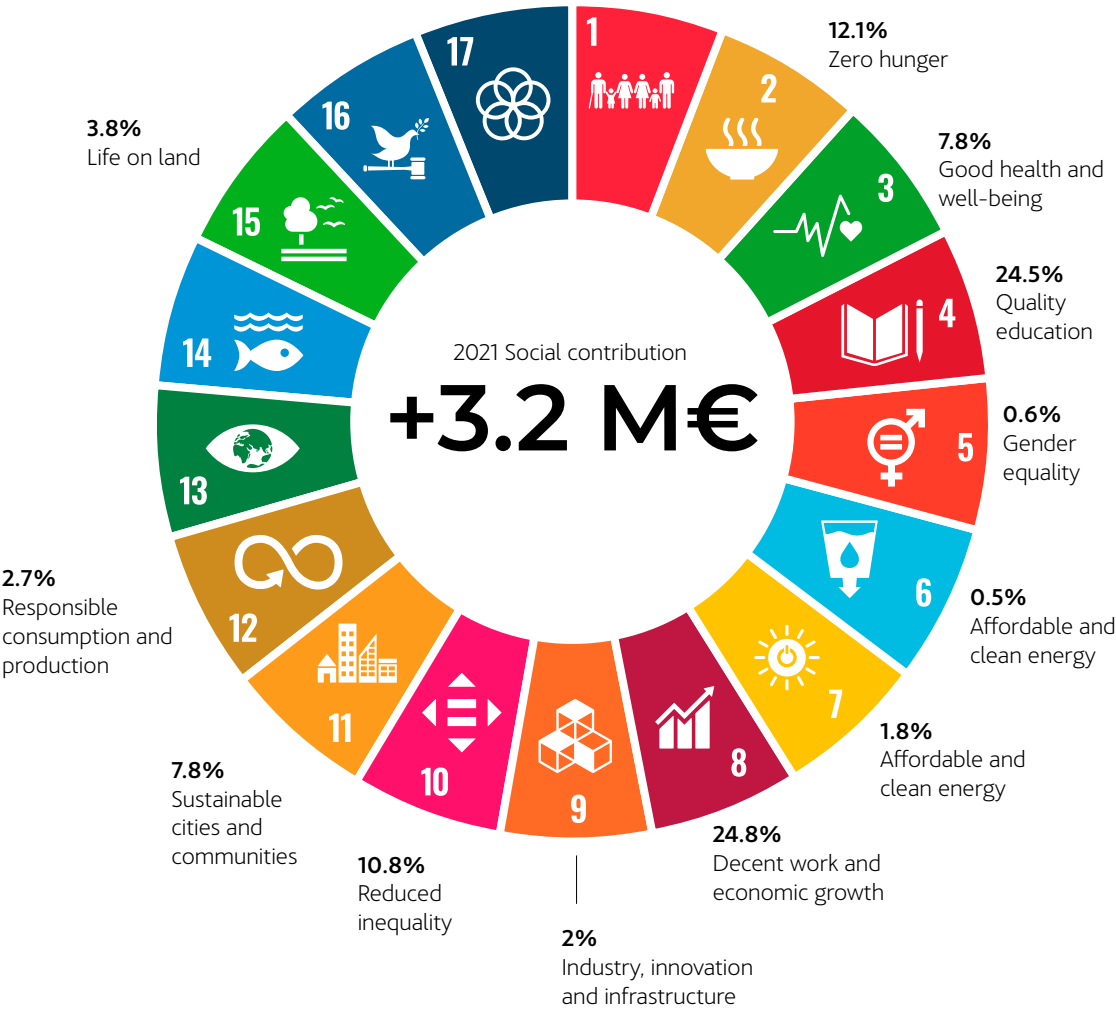
Contribution by area of action



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Contribution to the SDGs



WORKING TOWARDS MORE LOCAL VOLUNTEERING

In 2021, we started working on the new Volunteer Programme which will be implemented in the first months of 2022.

This new programme promotes employee participation, as well as associates and relatives, in initiatives driven either by the company or by themselves, with the aim of encouraging local volunteers and support for the communities where ACCIONA Energía develops its projects. The ultimate contribution of this proposal is to have greater knowledge of the local reality and strengthen the objective of being recognised as valuable players for society.

The volunteer proposal will be divided into three types:

- > Recognition Programme: led by human resources, including programmes nominally intended for employees showing exceptional performance.
- > Institutional Volunteering: development of activities with third-sector organisations (Foundations and NGOs) with which ACCIONA Energía has a relationship of institutional collaboration.
- > Project Volunteering: this takes place in settings where the company is working, responding to local social and environmental needs and maximising the positive impact of the projects on the community.

In 2021, the company put initiatives into effect with the participation of 108 volunteers who have dedicated 933 hours to working in the community with very varied targets: from promoting the path for young unemployed university graduates, together with the Princesa de Girona Foundation, helping to open up the job market to disabled women, victims of gender violence, people with family responsibilities or unemployed people in vulnerable situations, in collaboration with the Integra Foundation or the Quiero Trabajo Foundation, amongst others.

ACCIONA.ORG FOUNDATION

2021 was a year of major challenges for acciona.org, the foundation for energy and water. In 2021, new initiatives were addressed and the foundation began working in new countries.

- > 68,340 people benefitted in Peru, Mexico and Panama, equivalent to 16,111 homes that have benefitted.
- > 976 rural and indigenous communities served in Peru, Mexico and Panama.
- > 29 supply and service centres run by local microfranchised staff.

In 2021, acciona.org developed its first electric microgrid in the Peruvian Amazon, for which it has designed a new energy supply model using photovoltaic power generation and storage in lithium batteries, moving away from the consumption of fossil fuel and increasing the hours of electricity available in 53 homes and community facilities.

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Also in Peru, the foundation has taken the electricity supply and guaranteed reliable water and sanitation services to over 5,700 homes. For example, under a pilot project in two communities in the Ica department, 165 families now have improved water and sanitation systems. By extending the perimeter of operation of the rural electrification programme Luz en Casa Amazonía to the river basins of the Amazonas and Ucayali rivers, 502 families in Amazon communities have had access to a basic electricity service for the first time.

In Mexico, acciona.org has so far provided affordable, reliable and sustainable basic services to nearly 9,000 households and 35,545 people. 2021 centred on implementing a new phase of the EncASa Oaxaca programme under which 266 improved drinking water and sanitation systems and cooking facilities were installed in 131 homes. The beneficiary families themselves have built them collectively, using the materials and professional training given by acciona.org.

In Panama, the Luz en Casa Ngäbe-Buglé programme continued providing 1,425 homes and 8,055 people with access to the basic electricity service in the indigenous region of the same name, and began a new scale-up phase that will practically double the number of homes benefitting in the first months of 2022.

In 2021, acciona.org began operating in other locations. In Chile, it implemented a pilot Luz en Casa project incorporating advanced models of third-generation home photovoltaic systems and adapting the economic aspects. 15 homes already have Luz en Casa in Caleta Maitencillo, a fishing community in the Coquimbo region.

It also embarked upon a project for combatting energy poverty in Spain, in San Juan del Puerto, in the province of Huelva. The project intends to use power generated by a photovoltaic installation fitted on a municipal building to reduce the electricity bills for vulnerable families. The plant will also provide electricity to town hall offices and will be put into operation in 2022.

Lastly, it is worth mentioning that, despite the difficulties in implementing the project “Shire Alliance: Access to energy for refugee camps and host communities” in Ethiopia, the initiative continued together with the partners in this Spanish multisectorial alliance. Due to the armed conflict in Tigray, the region where the Shire refugee camps are located, the project had to be

moved to the camps in Dollo Ado, in the Somali region, where acciona.org has been working during the year on adapting the supply model to the new site in its technical, financial and management aspects.

The work carried out by the Foundation in 2021 has been possible thanks to its partners and co-financiers, such as the Polytechnic University of Madrid, and the Spanish Agency for International Development Cooperation, with whom it develops synergies that facilitate the promotion and improvement of its supply models.

IMPACT FUNDING

ACCIONA Energía uses two mechanisms of sustainable financing: one aimed at projects or activities with sustainable goals intended to promote specific positive impacts associated to financing, and corporate financing that involves undertakings to improve the ESG performance of the whole company.

Green Financing

ACCIONA has a Green Financing Framework which has eligible activities that are in line with a low-carbon economy. The framework has been reviewed by Sustainalytics, who gave a second party opinion (SPO) confirming its alignment with the Green Bond Principles and the Green Loan Principles. In October of 2021, Sustainalytics reviewed the renewable energy activities of the Green Finance Framework for alignment with the EU Taxonomy Delegated Act, published in June 2021. This assessment only refers to assets and projects of ACCIONA Energía.

During 2021, ACCIONA Energía has successfully set the price for its inaugural green bond, with a €500 million six-year issue. The company’s debut on the debt capital market, with over five times more demand than offer and a competitive funding cost, confirms the appeal of ACCIONA Energía to investors for its 100% independent renewable utility profile and for its sustainability credentials.

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Financing linked to sustainability

ACCIONA Energía has a Sustainability-Linked Financing Framework, reviewed by DNV GL, who gave a second party opinion (SPO) confirming its alignment with the Sustainability-Linked Bond Principles and Sustainability-Linked Loan Principles.

In 2021, ACCIONA Energía signed a financing agreement linked to sustainability criteria for € 2,500 M€, which will enable it to coordinate its financial independence as a listed company.

The instrument was structured on an innovative ESG “double impact” scheme that links the reductions in its cost to the achievement of sustainability goals at company level and – for the first time for an instrument of this kind– to commitments of generating a positive local impact. The company has met the targets set so far.

In both types of financing, the company’s investment is linked to the vocation of ACCIONA Energía for implementing the sustainable agenda and decarbonisation through renewable energies.



**i** More information on green financing instruments and the projects to which they are allocated: <https://www.accion-energy.com/shareholders-investors/stock-market-information/sustainable-finance/>

S&P awards ACCIONA Energía the highest ESG rating in the electricity sector

ACCIONA Energía has received the highest rating in the world electricity sector on environment, social and corporate governance issues (ESG) in a cross-sectoral evaluation made by S&P Global Ratings. ACCIONA Energía, which focuses exclusively on renewable energy, obtained a score of 86 points out of 100 in its ESG evaluation, making it the leading company in the sector and fifth at world-wide level in all sectors.

The S&P Global Ratings ESG evaluation is a thorough assessment of a company’s ability to address future risks and opportunities related to ESG factors, such as climate change, regulatory risk or reputational issues.

Furthermore, for the sixth year running, ACCIONA Energía has consolidated its position as the world´s “greenest” electricity generation company, according to Energy Intelligence

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the Chairman

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Only in  
renewables

3

Degree of  
fulfilment of  
commitments

4

People  
centric

5

Planet  
positive

6

Exponential  
leadership

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# IMPACT PER REGION

EFFECTS OF THE COMPANY'S BUSINESS  
IN HIGHLIGHTED COUNTRIES

Spain

Noteworthy projects in 2021

Sangüesa Plant

BIOMASS  
30 MW  
OF POWER

Almendralejos Plant

PHOTOVOLTAIC  
125 MW  
OF POWER

Celada Fusión Plant

WIND POWER  
48 MW  
OF POWER

Power to Green Hydrogen Mallorca

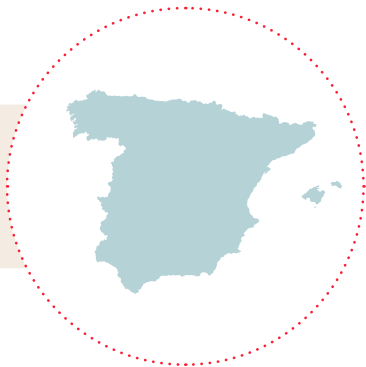
GREEN HYDROGEN  
300 TONNES  
PER YEAR

Bolarque I Plant

PHOTOVOLTAIC  
50 MW  
OF POWER

IP power plant

HYDROELECTRIC  
88.5 MW  
OF POWER



Highlighted indicators

	2019	2020	2021	Var. 2020- 2021
Activity				
Sales (million euros)	1,197	1,002	1,502	50%
Renewable energy production (GWh)	12,791	12,486	12,218	- 2%
Social				
Workforce at year-end	954	900	925	3%
Women in management and executive positions (%)	21.6	23.3	26.0	2.7 pb
People with disabilities in Spain (%)	NA	4.07	3.20	- 21%
Accidents: global frequency rate (employees and subcontractors)	1.00	0.95	0.67	- 29%
Environmental				
Emissions avoided (thousands of tCO <sub>2</sub> e)	6,043	5,446	5,373	- 1%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	11.9	5.9	3.0	- 49%
Percentage of waste to landfill (%)	4	4	3	- 1 pb
Water consumption (thousands of m <sup>3</sup> )	1,009	1,003	1,035	3%

Australia

Noteworthy projects in 2021



Waubra Plant

WIND POWER

192 MW  
OF POWER

Mortlake South Plant

WIND POWER

157 MW  
OF POWER

Macintyre Plant

WIND POWER

923 MW  
OF POWER

Mt. Gellibrand Plant

WIND POWER

132 MW  
OF POWER

Lilyvale Plant

PHOTOVOLTAIC

118 MW  
OF POWER

Highlighted indicators

	2019	2020	2021	Var. 2020- 2021
Activity				
Sales (million euros)	76	92	59	- 36%
Renewable energy production (GWh)	1,234	1,239	1,149	- 7%
Social				
Workforce at year-end	100	106	112	+ 6%
Women in management and executive positions (%)	22.2	18.1	21.0	2.9 pb
Accidents: global frequency rate (employees and subcontractors)	1.18	0.94	0	- 100%
Environmental				
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,081	979	975	-0%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	1.4	2	0.01	- 99%
Percentage of waste to landfill (%)	100	10	39	29 pb
Water consumption (thousands of m <sup>3</sup> )	7	3	1	- 58%

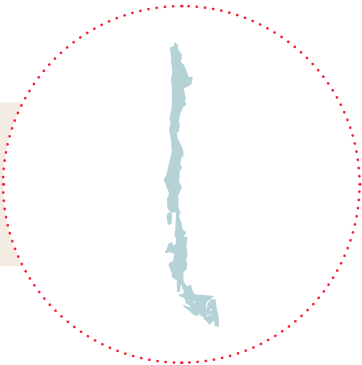
# Chile

Noteworthy projects in 2021

Parque de Tolpán Sur  
WIND POWER  
84 MW OF POWER

Construction of the Malgarida II photovoltaic complex  
PHOTOVOLTAIC  
654 GWh PER YEAR

Usya Plant  
PHOTOVOLTAIC  
64 MWp OF POWER



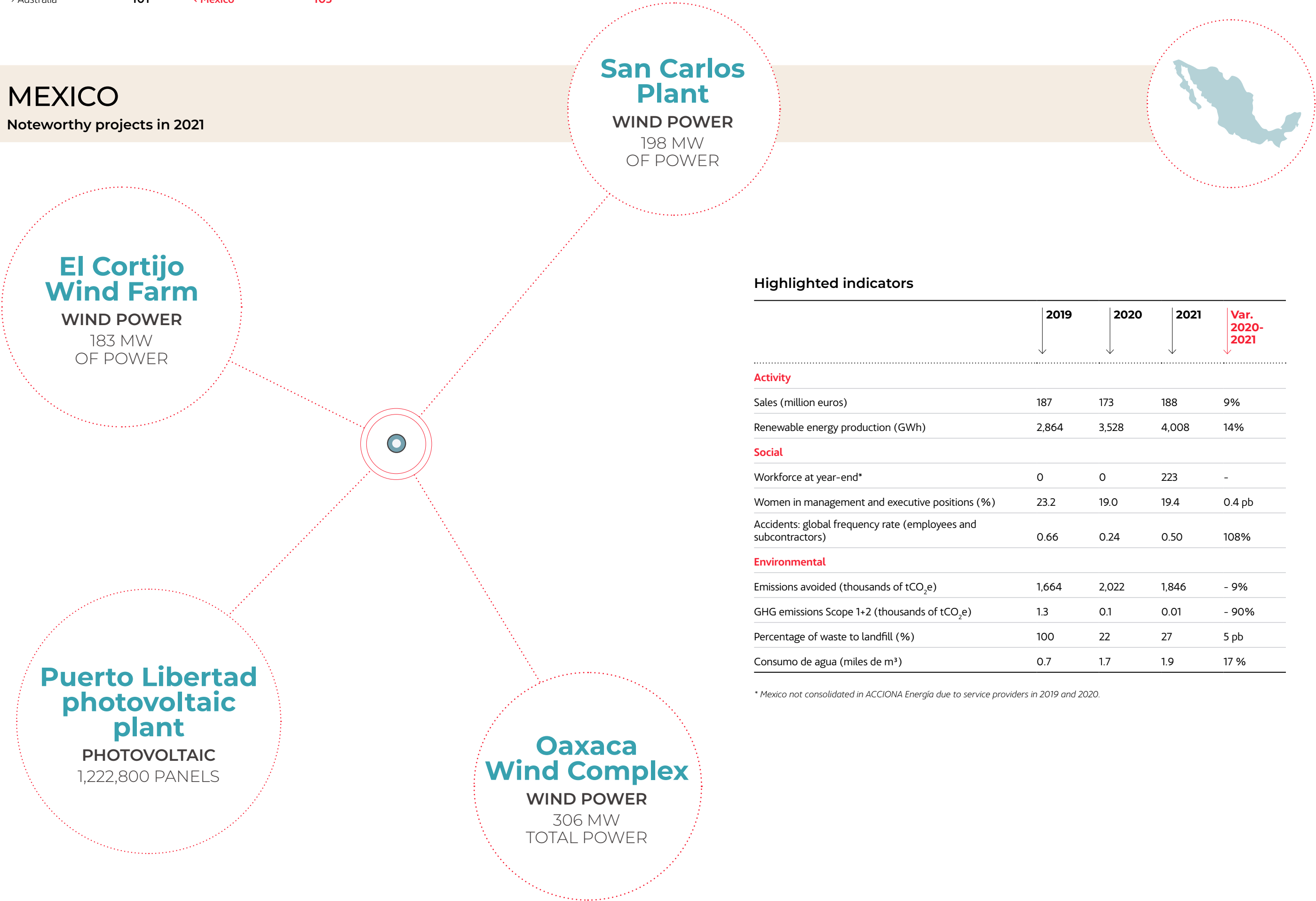
## Highlighted indicators

	2019	2020	2021	Var. 2020-2021
Activity				
Sales (million euros)	117	154	229	49%
Renewable energy production (GWh)	735	1,461	2,085	43%
Social				
Workforce at year-end	211	193	145	- 25%
Women in management and executive positions (%)	8.7	11.5	24.2	12.7 pb
Accidents: global frequency rate (employees and subcontractors)	0.78	0.45	0.57	27%
Environmental				
Emissions avoided (thousands of tCO <sub>2</sub> e)	575	1,072	1,803	68%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	0.17	0.2	0.0	- 100%
Percentage of waste to landfill (%)	100	83	99	16 pb
Water consumption (thousands of m <sup>3</sup> )	16	13	2	- 82%

> Spain	100	> Chile	102	> UnitedStates	104
> Australia	101	< Mexico	103		

MEXICO

Noteworthy projects in 2021



Highlighted indicators

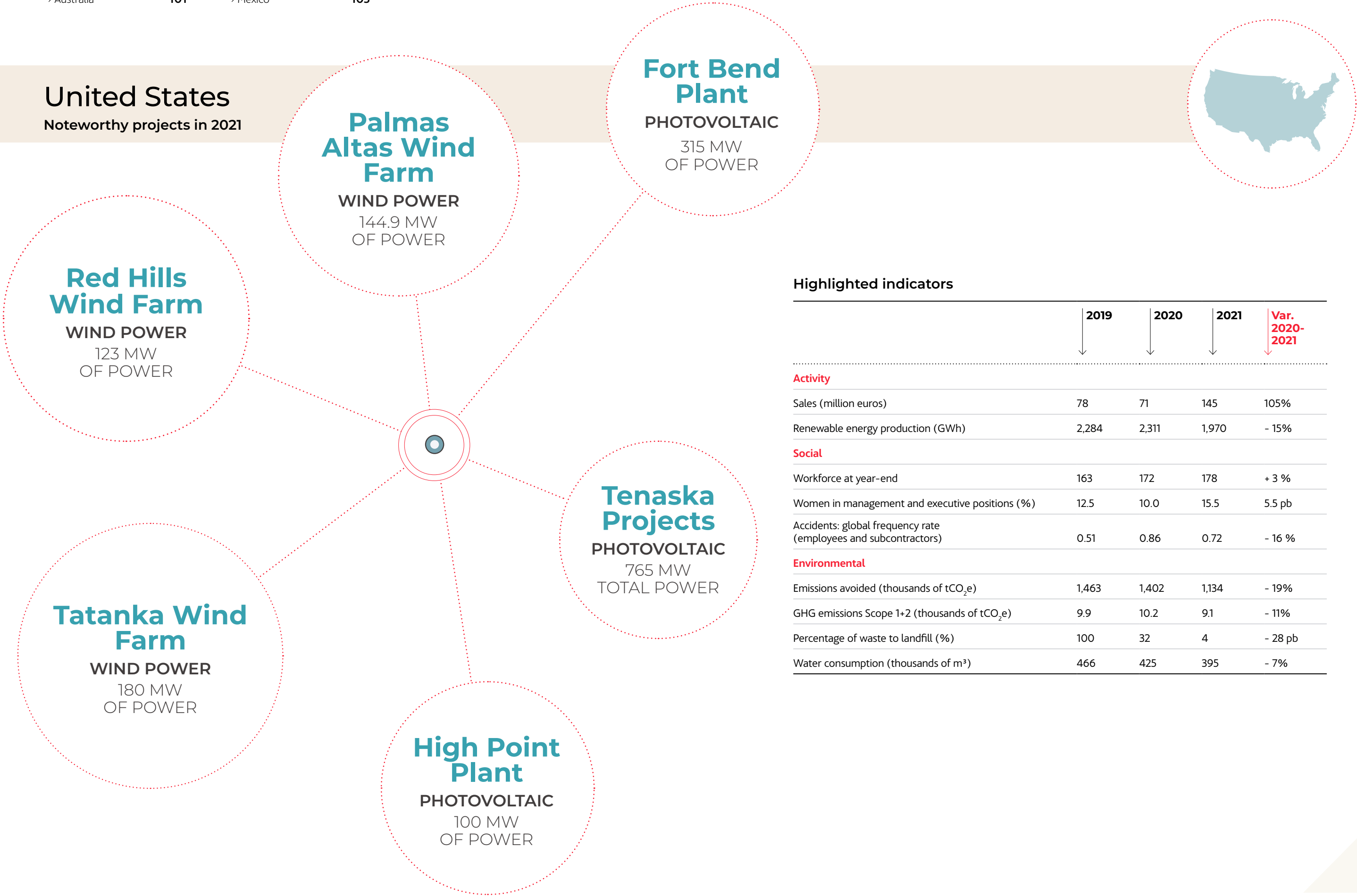
	2019	2020	2021	Var. 2020-2021
<b>Activity</b>				
Sales (million euros)	187	173	188	9%
Renewable energy production (GWh)	2,864	3,528	4,008	14%
<b>Social</b>				
Workforce at year-end*	0	0	223	-
Women in management and executive positions (%)	23.2	19.0	19.4	0.4 pb
Accidents: global frequency rate (employees and subcontractors)	0.66	0.24	0.50	108%
<b>Environmental</b>				
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,664	2,022	1,846	- 9%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	1.3	0.1	0.01	- 90%
Percentage of waste to landfill (%)	100	22	27	5 pb
Consumo de agua (miles de m³)	0.7	1.7	1.9	17 %

\* Mexico not consolidated in ACCIONA Energía due to service providers in 2019 and 2020.

› Spain	100	› Chile	102	‹ United States	104
› Australia	101	› Mexico	103		

# United States

Noteworthy projects in 2021



## Highlighted indicators

	2019	2020	2021	Var. 2020-2021
<b>Activity</b>				
Sales (million euros)	78	71	145	105%
Renewable energy production (GWh)	2,284	2,311	1,970	- 15%
<b>Social</b>				
Workforce at year-end	163	172	178	+ 3 %
Women in management and executive positions (%)	12.5	10.0	15.5	5.5 pb
Accidents: global frequency rate (employees and subcontractors)	0.51	0.86	0.72	- 16 %
<b>Environmental</b>				
Emissions avoided (thousands of tCO <sub>2</sub> e)	1,463	1,402	1,134	- 19%
GHG emissions Scope 1+2 (thousands of tCO <sub>2</sub> e)	9.9	10.2	9.1	- 11%
Percentage of waste to landfill (%)	100	32	4	- 28 pb
Water consumption (thousands of m <sup>3</sup> )	466	425	395	- 7%





APPENDIX

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ABOUT THIS REPORT

This *Sustainability Report* sets out the progress, results and status of ACCIONA Energía’s sustainability performance in 2021, as well as its management approach and the challenges it faces. The object 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 on its different stakeholders.

The report focuses on the progress made during 2021. The content has been expressed to serve as the company’s *Non-Financial Information Statement*.

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 Energía’s contribution to achieving the Sustainable Development Goals (SDGs) at local level.

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 the ACCIONA Energía website: <https://www.acciona-energia.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 Law 11/2018, with a structure adapted to the Sustainability Master Plan 2025. Following these chapters, the reader will find the most relevant information on sustainability at national level.

The report complies with the principles of comparability, materiality, relevance and reliability:

COMPARABILITY

The *Sustainability Report* is published annually and is prepared in accordance with the Reporting Principles included in Standard 1 of the Global *Reporting Initiative* (GRI). ACCIONA has followed the principles – such as comparability, completeness and balance – described in this standard. This *Report* has been prepared in accordance with GRI Standards: comprehensive option.

MATERIALITY AND RELEVANCE

The 2021 Materiality Analysis, carried out in line 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 Energía considers that the information contained in this *Report* is relevant for the company and its various stakeholders. The sub-section titled *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 *Report* through the firm KPMG Asesores S.L. As a result of the audit process, this *Report* contains an *Independent Review Report* detailing the objective and scope of the review, the procedures used and the conclusions reached.

ACCIONA Energía has chosen a reasonable level of review for some indicators. The company is working on formalising the Internal Control Framework for Non-Financial Reporting (ICFNFR) with which it can comply with the principles that guarantee the reliability of the indicators: completeness, accuracy, consistency, traceability and internal control. With the approval of the ICFNFR Framework in 2022, it will be possible to make a reasonable review of all relevant indicators.

SCOPE

ACCIONA Energía reports the information on its non-financial performance in all its activities, providing an overview for each geographical area where it operates.

The scope of the report comprises all of the group companies<sup>11</sup>, in all their significant aspects, in accordance with the terms of Law 11/2018, of 28 December, on non-financial information and diversity.

Throughout the report, the scope of each one 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 criterion for the consolidation of environmental information is based on the financial control scheme.

PARENT COMPANY

ACCIONA Energía is a subsidiary of ACCIONA S.A. listed on the stock exchange since 2021. The parent company publishes its own *Sustainability Report* in its annual *Directors Report*. Both reports follow the same principles and objectives.

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 company that meets the requirements set out in article 49.5 of the Code of Commerce is: ACCIONA Generación Renovable S.A.

1	Letter from the Chairman
2	Only in renewables
3	Degree of fulfilment of commitments
4	People centric
5	Planet positive
6	Exponential leadership
7	Integrate to transform
8	Impact per region
9	Appendices

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ANNEX OF ITEMIZED INDICATORS

DEFINITION OF MATERIAL TOPICS (GRI 3-2)

The topics affecting ACCIONA Energía are a reflection of the global megatrends identified in works like the WBCSD Vision 2050 and the Global Infrastructure Hub's *Infrastructure Futures Report*.

Material topic	Pillar and area of the SMP	GRI	Issues included	Description	Related megatrends	Principal stakeholders
Water	Planet Positive/ Water	303	Water consumption, effluents, water treatment	Appropriate management of water use includes catchment, consumption, treatment and associated effluent in such a way that the total net impact on the water resource is regenerative.	Increase in natural disasters and resilient infrastructure	Customers Local communities
Sustainable supply chain	Exponential leadership/ Transparency	204, 308, 414	Procurement practices, supplier assessment, co-creation with supply chain partners	Social, environmental and ethical criteria are relevant for selecting suppliers. This includes establishing policies, corrective measures 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.	Shift in demand towards the emerging economies Globalisation and international trade	Suppliers
Climate change	Planet Positive/ Climate	302, 305	Mitigation, adaptation and resilience to climate change, energy, air quality, green finance	Strategy adopted for attaining a net-zero resilient economy in 2050: financing and investing in renewable energy, promoting energy efficiency, reducing greenhouse gas emissions, using carbon pricing, adapting projects or assets to extreme weather events.	Increase in green energy sources Escalating climate change	Customers Suppliers Investors Public administrations

Material topic	Pillar and area of the SMP	GRI	Issues included	Description	Related megatrends	Principal stakeholders
Natural capital	Planet Positive/ Biodiversity	304, 307	Biodiversity, ecosystem services, environmental compliance, environmental risk management, discharges	The impact management carried out by the company on the natural capital and biodiversity 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.	Increased number of larger, more complex projects	Local communities
Cybersecurity	Exponential leadership/ Transparency	418	Data protection, cyber-attacks, customer privacy	Digital transformation and cyber-attacks 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.	Greater security risk	Customers
Communities	Integrate to transform/ Regenerative ecosystems	413	Living conditions, community relations, culture and heritage, social licence, access to basic services	The impact of the company's activity on the local communities has to be managed, starting with having appropriate dialogue with them, in order to conserve the social licence to operate. The effects on the local surroundings include aspects such as population displacement, visual impact, citizen safety and indigenous culture and heritage.	Global division and increase in social inequality	Local communities
Human rights	People centric/ Access	402, 407, 408, 409, 410, 411, 412	Social safeguards, labour relations, collective agreements, modern slavery, child labour, rights of indigenous peoples	Measures introduced to respect the Human Rights of stakeholders and mechanisms to safeguard any possible violations, both in social and labour relationships, including suppliers.	Global division and increase in social inequality	Employees Local communities Suppliers

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Material topic	Pillar and area of the SMP	GRI	Issues included	Description	Related megatrends	Principal stakeholders
Local development	Integrate to transform: <i>A sustainable difference in each project</i>	201, 203	Local work, local investment, indirect economic impact, livelihoods	A company's activity has a positive repercussion on the local economy, for example by generating wealth, providing jobs and new sectoral financial ecosystems. This impact can be extended with additional adjacent projects having an entrepreneurial, sustainable business model involving the economic (not only the social and environmental) aspect.	Infrastructure and population growth	Local communities Customers
Diversity and inclusion	People centric/ <i>Diversity</i>	405, 406	Gender equality, multiculturalism, anti-racism, accessibility, non-discrimination, insertion	Measures that guarantee diversity and equality of opportunity, from hiring people at risk of social exclusion or multiculturalism training. Additionally, actions implemented for overcoming the salary divide are taken into account.	Global division and increase in social inequality	Employees
Circular Economy	Planet Positive/ <i>Circularity</i>	301, 306	Resource efficiency, re-use, recycling, hazardous waste, sustainable materials	The circular economy promotes change towards an economy efficient in the use of material resources, taking into account an analysis of the complete 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.	Collaborative economy Increase in new materials and substances Scarcity of resources and increased circular economy	Customers Suppliers Partners
Work environment and safety	People centric/ <i>Environment</i>	403	Accident prevention, occupational diseases, anti-contagion measures, wellbeing, satisfaction, reconciliation, disconnection	A reduction in occupational accidents and worker and contractor illnesses requires identifying and reducing the risks, and training. A sustainable work environment also includes measures for the organisation of working hours.	Increased concern for health and safety	Employees Suppliers

Material topic	Pillar and area of the SMP	GRI	Issues included	Description	Related megatrends	Principal stakeholders
Ethics and anti-corruption	Exponential leadership/ <i>Governance</i>	205, 206, 415, 419	Anti-corruption, anti-competitive behaviour, codes of conduct, relations with public administrations, third parties	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 bidding and tenders. Any activity in public policy has to be transparent and relations with third parties must be safeguarded throughdue diligence.	Increase in distrust and the pressure for greater transparency	Public administrations Partners Employees
Responsible taxation	Exponential leadership/ <i>Governance</i>	207	Tax contributions	Transparency in the breakdown of tax paymentsis relevant for companieswith multinational presence.	Increase in distrust and the pressure for greater transparency	Public administrations
Corporate governance	Exponential leadership/ <i>Governance</i>	2	Governing and executive bodies, internal control, relations with shareholders, authenticity, tone at the top	A high degree of transparency, efficiency and thoroughness in the functioning of the governing bodies is a decisive aspect for generating long-term trust and commitment on the part of stakeholders.	Multipolar world	Investors
Customer satisfaction	Exponential leadership/ <i>Authenticity</i>	416, 417	Customer relations, feedback, customer health and safety, labelling, product quality	Establishing mechanisms for collecting customer opinions, and thus being able to measure their satisfactionand managing the relationships with them. Ensuring the quality and safety of the products supplied.	Pressure for businesses to increase efficiency and productivity	Customers
Talento	People centric / Leadership and <i>Acknowledgement</i>	202, 401, 404	Selection, evaluation, development, leadership, compensation, training, turnover, young talent	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.	Ageing of the population and the workforce	Employees

1 Letter from the Chairman

2 Only in renewables

3 Degree of fulfilment of commitments

4 People centric

5 Planet positive

6 Exponential leadership

7 Integrate to transform

8 Impact per region

9 Appendices

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DISTRIBUTION OF EMPLOYMENT (GRI 2-7)

Evolution of distribution of the workforce per contract type and gender (no. of employees)

	2020			2021		
	Men	Women	Total	Men	Women	Total
Temporary	49	16	66	53	24	77
Permanent	1,072	405	1,477	1,208	476	1,685

Breakdown of the workforce by job classification and age range in 2021 (no. of employees)

	< 31	31 to 50	> 50	Total
Executives and managers	6	341	93	440
Technical staff	198	652	71	921
Support staff	7	47	15	69
Operators	87	206	39	332
Total employees	299	1,246	218	1,762

Number of employees per contract type and age range in 2021 (%)

	Temporary	Permanent
< 31 years	2.1	14.8
31 to 50 years	1.7	69.0
> 50 years	0.5	11.8

Number of employees per contract type and job classification in 2021 (%)

	Temporary	Permanent
Executives and managers	0.3	24.7
Technical staff	2.8	49.5
Support staff	0.2	3.7
Operators	1.1	17.8

Geographical distribution of the workforce in 2021 (no. of employees)

	Men	Women	Total
Spain	629	296	925
Mexico	173	51	223
United States	152	26	178
Chile	97	48	145
Australia	75	38	112
Rest of countries	136	42	178
Total employees	1,262	501	1,762

Breakdown of the workforce by job classification and type of working day in 2021 (%)

	Full time			Part time		
	Men	Women	Total	Men	Women	Total
Executives and managers	101	338	439	1	0	1
Technical staff	316	601	916	4	1	5
Support staff	59	6	65	2	1	3
Operators	17	315	332	1	0	1
Total employees	492	1,260	1,752	8	2	10

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Breakdown of the workforce by age range and full/part time status in 2021 (%)

	Full time			Part time		
	Men	Women	Total	Men	Women	Total
< 31 years	5.12	11.79	16.90	0.00	0.04	0.04
31 to 50 years	2.60	9.58	12.18	0.19	0.00	0.19
> 50 years	20.22	50.14	70.36	0.27	0.05	0.32
Total employees	27.94	71.51	99.45	0.47	0.09	0.55

Average permanent contracts per year by age, gender and job classification in 2021 (no. of employees)

	Women				Men			
	< 31	31 to 50	> 50	Total	< 31	31 to 50	> 50	Total
Executives and managers	-	12	-	12	1	30	2	33
Technical staff	32	31	4	67	66	68	12	146
Support staff	3	6	1	10	2	-	-	2
Operators	34	5	-	39	50	31	2	83
Total employees	69	54	5	128	119	129	16	264

DISMISSALS (401-1)

Dismissals by gender and job classification in 2021 (no.)

	Men	Women	Total
Executives and managers	1	-	1
Technical staff	8	1	9
Support staff	1	4	5
Operators	22	-	22
Total	32	5	37

Note: data as of 31/12/2021 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).

Dismissals by job classification and age range in 2021 (no.)

	< 31	31 to 50	> 50	Total
Executives and managers	-	1	-	1
Technical staff	1	7	1	9
Support staff	-	5	-	5
Operators	5	15	2	22
Total employees	6	28	3	37



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NEW HIRES (401-1)

New hires by age group in 2021 (no.)

	Men	Women	Total
< 31 years	119	69	188
31 to 50 years	129	54	183
> 50 years	16	5	21
Total employees	264	128	392

MATERNITY AND PATERNITY LEAVE (401-3)

Employees entitled to maternity/paternity leave in 2021 (no. of employees)

	Men	Women	Total
Number of employees with the right to maternity/paternity leave	137	4	141
Number of employees who took maternity/paternity leave	137	4	141
Number of employees who returned to work after taking maternity/paternity leave	114	20	134
Number of employees who returned to work after taking maternity/paternity leave and remained in their jobs twelve months after returning to work	114	19	133
Retention ratio*	100%	95%	99.25%

\*The ratio includes the number of employees remaining in their jobs on 31 December 2021 after having taken paternity/maternity leave in 2021 between the number of employees on paternity/maternity leaves that took place in that year.

TRAINING (404-1)

Training received per job classification and gender

		Executives and managers	Technical staff	Support staff	Operators	Total
Total number of hours received	Men	22,991	32,773	327	13,099	69,189
	Women	8,762	17,341	1,672	1,424	29,199
	Total	31,753	50,114	1,998	14,523	98,388
Students	Men	382	777	8	393	1,540
	Women	118	388	77	26	601
	Total	500	1,165	85	419	2,141
Training hours per employee/year	Men	68	54	47	42	55
	Women	86	54	27	84	58
	Total	72	54	29	44	56

REMUNERATION (405-2)

Total average remuneration broken down by gender, age and job classification (€)

		Production and business development areas	Age	
Gender	Job classification	< 31	31 - 50	> 50
Men	Executives and managers	96,606	105,060	138,940
	Technical and qualified staff	44,132	52,541	72,887
	Other personnel	28,120	30,379	42,081
Women	Executives and managers	No data	87,484	142,995
	Technical and qualified staff	34,775	48,129	51,599
	Other personnel	11,903	29,884	36,508

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Support Areas		Age		
Gender	Job classification	< 31	31 – 50	> 50
Men	Executives and managers	44,000	98,101	108,435
	Technical and qualified staff	35,985	39,258	68,061
	Other personnel	7,795	15,552	16,488
Women	Executives and managers	67,276	95,916	119,495
	Technical and qualified staff	41,406	43,141	68,915
	Other personnel	40,565	18,393	44,395

Notes: professionals with annual earnings of less than 3,000 euros who could not be annualised are not included in the statistical analysis. It is worth noting the inclusion of the salaries of workers in the 20 countries where ACCIONA does business. The company has defined remuneration policies for each one of the countries where it does business. Therefore, the average aggregate compensation figures for all countries taken together are not representative of the individual wage management policies of each country where ACCIONA Energía operates. 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.

The average total remuneration for members of management who were not executive directors was €182,000 for men and €177,000 for women.

(2-21)

Ratio between the highest wage earner and average wage in 2021: 13.73.

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 in 2021: -28.30.

EUROPEAN TAXONOMY OF ENVIRONMENTALLY SUSTAINABLE ECONOMIC ACTIVITIES

The active involvement of financial markets in financing the sustainable economy is indispensable for the European Union’s plans to move 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, which 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”.

In this respect, the proportion of Taxonomy-eligible and Taxonomy non-eligible economic activities in ACCIONA Energía during 2021 was as follows:



In order to determine the proportions shown, on the basis of the financial statements reported by the company, the figures for turnover, CapEx and OpEx per business type in ACCIONA Energía were identified and the amounts were selected 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 that that activity does not significantly harm any of the other environmental objectives. For the analysis of sustainable economic activities in ACCIONA Energía, the turnover figures have been analysed at the revenue account level by company, in the case of CapEx at the project level and for OpEx at the cost center level, considering in all cases the guidance included in the Taxonomy Regulation. Once established, the figures selected were divided into the total figures.

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For identifying 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 specific:

- › 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 Standard 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 cover the costs accounted for in accordance with:
  - › IAS 16 Property, Plant and Equipment, paragraph 73, letter e), points i) and iii);
  - › IAS 38 Intangible Assets, paragraph 118, letter e), point i);
  - › IAS 40 Investment property, paragraph 76, letters a) and b), (for the fair value model);
  - › IAS 40 Investment property, paragraph 79, letter d), points i) and ii), (for the cost model);
  - › IAS 41 Agriculture, paragraph 50, letters b) and e);
  - › 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 accounted for 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:
  - › Short term 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:

- › 4.1. Electricity production using solar photovoltaic 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
- › 7.4. Installation, maintenance and repair of charging stations for electric vehicles in buildings (and in car-parking spaces annexed to buildings)
- › 9.3. Professional services related to the energy efficiency of buildings

Different mechanisms have been implemented to ensure the avoidance of any double accounting. 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 as a internal 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.

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Even though the report on ACCIONA Energía’s taxonomy-aligned activities is not mandatory in 2022, the same as in the previous two year, the company conducted this analysis, obtaining the following results:



The criteria mentioned for the case of eligibility have been equally studied for alignment. Additionally:

The assessment of compliance of 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 7 activities identified. General speaking, the assessments carried out comprised on 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 Energía’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. The absolute OpEx and CapEx figures presented below meet the specific definitions observed under Annex I of Delegated Regulation (EU) 2021/2178, so they could differ from those presented under the title of the same name in the company’s financial statements.

Taxonomy alignments per activity and environmental objective

Economic activities

Codes	Absolute turnover (€)	Proportion of turnover (%)	Substantial contribution criteria		“DNSH criteria (‘Does Not Significantly Harm’)		Minimum safeguards (Y/N)		Taxonomyaligned proportion of turnover, year N (%)	Categoryyn (enabling activity) (F)	Category (transitional activity)’ (T)
			Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)		

A- TAXONOMY-ELIGIBLE ACTIVITIES

A.1. Environmentally sustainable activities (Taxonomy-aligned)

Electricity generation using solar photovoltaic technology	4,1	119,836,395	4.85%	4.85%	0.00%	Y	Y	Y	Y	Y	Y	Y	7.01%	-	-
Electricity generation using concentrated solar power (CSP) technology	4,2	16,820,613	0.68%	0.68%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.98%	-	-
Electricity generation from wind power	4,3	1,416,668,755	57.30%	57.30%	0.00%	Y	Y	Y	Y	Y	Y	Y	82.93%	-	-
Electricity generation from hydropower	4,5	71,950,786	2.91%	2.91%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.21%	-	-
Electricity generation from bioenergy	4,8	67,352,437	2.72%	2.72%	0.00%	Y	Y	Y	Y	Y	Y	Y	3.94%	-	-
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7,4	64,577	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.00%	F	-
Professional services related to energy performance of buildings	9,3	7,654,976	0.31%	0.31%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.45%	F	-
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	1,700,348,537	68.77%	68.77%	0.00%	-	-	-	-	-	-	-	99.53%	-	-

A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)

Electricity generation from hydropower	4,5	7,994,532	0.32%	-	-	-	-	-	-	-	-	-	0.47%	-	-
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Taxonomy alignments per activity and environmental objective

Economic activities

	Codes	Absolute turnover (€)	Proportion of turnover (%)	Climate change mitigation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversity and ecosystems (Y/N)	Minimum safeguards (Y/N)	Taxonomyaligned proportion of turnover, year N (%)	Categoryyn (enabling activity) (F)	Category (transitional activity)' (T)
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	-	7,994.532	0.32%	-	-	-	-	-	-	-	-	-	0.47%	-	-
Total (A.1 + A.2)	-	1,708,343,069	69.09%	-	-	-	-	-	-	-	-	-	100%	-	-
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Turnover of Taxonomy-non-eligible activities (B)	-	764,113,032	30.91%	-	-	-	-	-	-	-	-	-	-	-	-
Total (A + B)	-	2,472,456,101	100%	-	-	-	-	-	-	-	-	-	-	-	-

OpEx

Economic activities

	Codes	Absolute OpEx (€)	Proporción del OpEx (%)	Climate change adaptation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversidad y ecosistemas (Y/N)	Minimum safeguards (Y/N)	Taxonom aligned proportion of OpEx, year N (%)	Categoryyn (enabling activity) (F)	Category (transitional activity)' (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES															
A.1. Environmentally sustainable activities (Taxonomy-aligned)															
Electricity generation using solar photovoltaic technology	4.1	10,815,423	7.45%	7.45%	0.00%	Y	Y	Y	Y	Y	Y	Y	7.69%	-	-
Electricity generation using concentrated solar power (CSP) technology	4.2	947,000	0.65%	0.65%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.67%	-	-
Electricity generation from wind power	4.3	118,460,218	81.57%	81.57%	0.00%	Y	Y	Y	Y	Y	Y	Y	84.26%	-	-
Electricity generation from hydropower	4.5	6,301,031	4.34%	4.34%	0.00%	Y	Y	Y	Y	Y	Y	Y	4.48%	-	-
Electricity generation from bioenergy	4.8	3,306,681	2.28%	2.28%	0.00%	Y	Y	Y	Y	Y	Y	Y	2.35%	-	-
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7.4	4,128	0.00%	0.00%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.00%	F	-
Professional services related to energy performance of buildings	9.3	51,842	0.04%	0.04%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.04%	F	-
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	139,886,324	96.32%	96.32%	0.00%	-	-	-	-	-	-	-	99.50%	-	-
A.2. Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)															
Electricity generation from hydropower	4.5	700,115	0.48%	-	-	-	-	-	-	-	-	-	0.50%	-	-



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OpEx

Economic activities

	Codes	Absolute OpEx ( € )	Proporción del OpEx (%)	Climate change adaptation (%)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversidad y ecosistemas (Y/N)	Minimum safeguards (Y/N)	Taxonom aligned proportion of OpEx, year N (%)	Categoryn (enabling activity) (F)	Category ' (transitional activity)' (T)
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	-	700,115	0.48%	-	-	-	-	-	-	-	-	-	0.50%	-	-
Total (A.1 + A.2)	-	140,586,438	96.80%	-	-	-	-	-	-	-	-	-	100%	-	-
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Turnover of Taxonomy-non-eligible activities (B)	-	4,647,090	3.20%	-	-	-	-	-	-	-	-	-	-	-	-
Total (A + B)	-	145,233,528	100%	-	-	-	-	-	-	-	-	-	-	-	-

CapEx

Economic activities

	Codes	Absolute CapEx ( € )	Proportion of CapEx (%)	Climate change mitigation (Y/N)	Climate change adaptation (%)	Climate change mitigation (Y/N)	Climate change adaptation (Y/N)	Water and marine resources (Y/N)	Circular economy (Y/N)	Pollution (Y/N)	Biodiversidad y ecosistemas (Y/N)	Minimum safeguards (Y/N)	Taxonom aligned proportion of CapEx, year N (%)	Categoryn (enabling activity) (F)	Category ' (transitional activity)' (T)
A. TAXONOMY-ELIGIBLE ACTIVITIES															
A.1. Environmentally sustainable activities (Taxonomy-aligned)															
Electricity generation using solar photovoltaic technology	4,1	265,612,465	46.85%	46.85%	0.00%	Y	Y	Y	Y	Y	Y	Y	46.85%	-	-
Electricity generation from wind power	4,3	289,701,125	51.10%	51.10%	0.00%	Y	Y	Y	Y	Y	Y	Y	51.10%	-	-
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	7,4	5,348,665	0.94%	0.94%	0.00%	Y	Y	Y	Y	Y	Y	Y	0.94%	F	-
Professional services related to energy performance of buildings	9,3	6,227,975	1.10%	1.10%	0.00%	Y	Y	Y	Y	Y	Y	Y	1.10%	F	-
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	566,890,230	100%	100%	0.00%	-	-	-	-	-	-	-	100%	-	-
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)															
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	-	-	0.00%	-	-	-	-	-	-	-	-	-	0.00%	-	-
Total (A.1 + A.2)	-	566,890,230	100%	-	-	-	-	-	-	-	-	-	100%	-	-
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Turnover of Taxonomy-non-eligible activities (B)	-	-	0.00%	-	-	-	-	-	-	-	-	-	-	-	-
Total (A + B)	-	566,890,230	100%	-	-	-	-	-	-	-	-	-	-	-	-



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Use of water (303-3, 303-4, 303-5)

Evolution of the use of water

	2018	2019	2020	2021
	↓	↓	↓	↓
WATER FOR INTERNAL CONSUMPTION (m³)				
On-site recycled/reused water	0	0	0	0
Recycled water from networks	443,872	492,613	490,253	486,597
Rainwater	596	484	400	355
Municipal drinking water	514,966	523,432	477,442*	446,417
Surface water	439,617	482,054	474,708	501,407
Groundwater	4,731	2,724	4,979	2,308
Total	1,403,782	1,501,308	1,447,781*	1,437,084
DISCHARGE (m³)				
Discharge into the sea	0	0	0	0
Discharge to surface water	286,572	311,904	321,077	325,615
Discharge into the sewer system	15,158	13,923	14,572	11,889
Total	301,730	325,826	335,649	337,504

\* Figures restated after correcting an error in the water consumption for the Nevada Solar One thermosolar plant (U.S.A.).

In addition to this consumption, ACCIONA Energía carries out water transfer activities. This refers to water that enters and leaves the facilities (hydroelectric 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 do not involve any consumption for the company. In 2021, this amounted to a total of 22,662,860,000 m³.

Evolution in the use of water in areas with water stress

	2018	2019	2020	2021
	↓	↓	↓	↓
WATER FOR INTERNAL CONSUMPTION (m³)				
On-site recycled/reused water	0	0	0	0
Recycled water from networks	0	0	0	0
Rainwater	14	19	6	0
Municipal drinking water	1,059	332	306	321
Surface water	0	0	0	0
Groundwater	1,081	1,380	1,757	1,019
Total	2,154	1,730	2,069	1,340
DISCHARGE (m³)				
Discharge into the sea	0	0	0	0
Discharge to surface water	693	0	0	0
Discharge into the sewer system	0	0	38	150
Total	693	0	38	150

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GRI CONTENT INDEX

ACCIONA Energía has reported in accordance with the GRI Standards for the period January 1st to December 31st, 2021.

For the Content Index - Essentials Service, GRI Services reviewed that the GRI content index is clearly presented, in a manner consistent with the Standards, and that the references for disclosures 2-1 to 2-5, 3-1 and 3-2 are aligned with the appropriate sections in the body of the report.



GRI Standard	Content	Pages	Direct response or omission	External verification
GRI 1: Foundation 2021				
GRI 2: General Disclosures 2021				
2-1	Organisation details	11	Corporación ACCIONA Energías Renovables S.A. Private company listed on stock exchanges Av. Europa 10, Alcobendas, Spain	✓
2-2	Entities included in the organization's sustainability reporting	Consolidated Financial Statements 2021 (Appendix I)		✓
2-3	Reporting period, frequency and contact point		2021 ( calendar year ending on 31 December ) Reporting cycle Contact point; responsabilidadcorporativa@acciona.es	✓
2-4	Restatements of information	117		✓
2-5	External assurance	13, 127-130	All of the information concerning the GRI Standards of this content index has been externally audited	✓
2-6	Activities, value chain and other business relationships	7-10		✓
2-7	Employees	24, 109-111		✓

GRI Standard	Content	Pages	Direct response or omission	External verification
2-8	Workers who are not employees	24, 109-111		✓
2-9	StGovernance structure and composition	13, 64 - 66 Corporate Governance Report 2021 (Sub-sections C1.2, C1.3 and C2.1)		✓
2-10	Nomination and selection of the highest governance body	Corporate Governance Report 2021 (Sub-section C1.16)		✓
2-11	Chair of the highest governance body	64-66 Corporate Governance Report 2021 (Sub-section C1.3)		✓
2-12	Highest governance body's role in overseeing the management of impacts	13 Corporate Governance Report 2021 (Sub-section C2.1)		✓
2-13	Delegation of responsibility for managing impacts	13 Corporate Governance Report 2021 (Sub-sections C1.3 and C2.1)		✓
2-14	Highest governance body's role in sustainability reporting	13		✓
2-15	Conflicts of interest	Corporate Governance Report 2021 (Sub-section D6)		✓
2-16	Communication of critical concerns	20, 67-70		✓
2-17	Collective knowledge of highest governance body	20, 67-70		✓
2-18	Evaluation of the performance of the highest governance body	Corporate Governance Report 2021 (Sub-section C1.17)		✓
2-19	Remuneration policies	66 Annual Report on Directors' remunerations for the 2021 financial year (Section A)		✓
2-20	Process for determining remuneration	66 Annual Report on Directors' remunerations for the 2021 financial year (Section A)		✓
2-21	Annual total compensation ratio	111		✓
2-22	Statement on sustainable development strategy	4-5, 9-10		✓
2-23	Policy commitments	20		✓

1 Letter from the Chairman

2 Only in renewables

3 Degree of fulfilment of commitments

4 People centric

5 Planet positive

6 Exponential leadership

7 Integrate to transform

8 Impact per region

9 Appendices

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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
2-24	Embedding policy commitments	14-16		✓
2-25	Processes to remediate negative impacts	38-42		✓
2-26	Mechanisms for seeking advice and raising concerns	67-71		✓
2-27	Compliance with laws and regulations	67-70		✓
2-28	Membership associations	80-81		✓
2-29	Approach to stakeholder engagement	16-17		✓
2-30	Collective bargaining agreements	38		✓
GRI 3: Material topics 2021				
3-1	Process to determine material topics	17-19		✓
3-2	List of material topics	17-19, 107-108		✓
TALENT				
GRI 3: Material topics 2021				
3-3	Management of material topics	24-29, 31-33		✓
GRI 401: Labour 2016				
401-1	New employee hires and employee turnover	33, 110-111		✓
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	27-28		✓
401-3	Parental leave	111		✓

GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 404: Training & Education 2016				
404-1	Average hours of training per year per employee	111		✓
404-2	Programmes for upgrading employee skills and transition assistance programmes	36-37		✓
404-3	Percentage of employees receiving regular performance and career development reviews	25		✓
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 throughout the company.	✓
202-2	Proportion of senior management hired from the local community		Over 90% of the total number of company executives have a local contract.	✓
DIVERSITY AND INCLUSION				
GRI 3: Material topics 2021				
3-3	Management of material topics	29-31		✓
GRI 405: Diversity and equal opportunity 2016				
405-1	Diversity of governance bodies and employees	29-31, 64-65, 109-110		✓
405-2	Ratio of basic salary and remuneration of women to men	26-27, 111		✓
WORK ENVIRONMENT AND SAFETY				
GRI 3: Material topics 2021				
3-3	Management of material topics	33-36		✓

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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 403: Occupational Health & Safety 2018				
403-1	Occupational health and safety management system	33-36		✓
403-2	Hazard identification, risk assessment, and incident investigation	33-36		✓
403-3	Occupational health services	35-36		✓
403-4	Worker participation, consultation, and communication on occupational health and safety	34		✓
403-5	Worker training on occupational health and safety	35-36		✓
403-6	Promotion of worker health	27-28, 35-36		✓
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	33-34, 36		✓
403-8	Workers covered by an occupational health and safety management system	36		✓
403-9	Work-related injuries	34-36		✓
403-10	Work-related ill health	35-36		✓
HUMAN RIGHTS				
GRI 3: Material topics 2021				
3-3	Management of material topics	38-42		✓
GRI 406: No discrimination 2016				
406-1	Cases of discrimination and corrective measures undertaken	68		✓

GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
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	38-42, 84		✓
GRI 408: Child Labour 2016				
408-1	Operations and suppliers at significant risk for incidents of child labour	20, 38-42, 84		✓
GRI 409: Forced or Compulsory Labour 2016				
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	20, 38-42, 84		✓
GRI 410: Security Practices 2016				
410-1	Security personnel trained in human rights policies or procedures		In 2021 there has been no Human Rights initiative aimed at Security personnel	✓
CLIMATE CHANGE				
GRI 3: Material topics 2021				
3-3	Management of material topics	43-53		✓

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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 302: Energy 2016				
302-1	Energy consumption within the organisation	53		✓
302-2	Energy consumption outside of the organisation	53		✓
302-3	Energy intensity	53		✓
302-4	Reduction of energy consumption	47		✓
302-5	Reductions in energy requirements of products and services	47		✓
GRI 305: Emissions 2016				
305-1	Direct (Scope 1) GHG emissions	50-51		✓
305-2	Energy indirect (Scope 2) GHG emissions)	50-51		✓
305-3	Other indirect (Scope 3) GHG emissions	51-52		✓
305-4	GHG emissions intensity	51		✓
305-5	Reduction of GHG emissions	47		✓
305-6	Emissions of ozone-depleting substances (ODS)		Not applicable: ACCIONA Energía does not use ozone-depleting gases in its facilities.	✓
305-7	Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	61		✓
NATURAL CAPITAL				
GRI 3: Material topics 2021				
3-3	Management of material topics	57-60		✓

GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
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	57-58		✓
304-2	Significant impacts of activities, products, and services on biodiversity	58		✓
304-3	Habitats protected or restored	58-60		✓
304-4	UCN Red List species and national conservation list species with habitats in areas affected by operations	58		✓
WATER				
GRI 3: Material topics 2021				
3-3	Management of material topics	54-55		✓
GRI 303: Water and effluents 2018				
303-1	Interactions with water as a shared resource	54-55		✓
303-2	Management of water discharge-related impacts	54-55, 58		✓
303-3	Water withdrawal	54, 117		✓
303-4	Water discharge	54, 117		✓
303-5	Water consumption	54, 117		✓
CIRCULAR ECONOMY				
GRI 3: Material topics 2021				
3-3	Management of material topics	55-57		✓

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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 306: Waste 2020				
306-1	Waste generation and significant waste-related impacts	55-56		✓
306-2	Management of significant waste-related impacts	55-57		✓
306-3	Waste generated	56		✓
306-4	Waste diverted from disposal	56-57		✓
306-5	Waste directed to disposal	56-57		✓
GRI 301: Materials 2016				
301-1	Materials used by weight or volume	56-57		✓
301-2	Recycled input materials used	56-57		✓
301-3	Reclaimed products and their packaging materials	56-57		✓
ETHICS AND ANTI-CORRUPTION				
GRI 3: Material topics 2021				
3-3	Management of material topics	67-70		✓
GRI 205: Anticorruption 2016				
205-1	Operations assessed for risks related to corruption	67-69		✓
205-2	Communication and training about anti-corruption policies and procedures	69		✓
205-3	Confirmed incidents of corruption and actions taken	68		✓

GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 415: Public Policy 2016				
415-1	Political contributions	69		✓
GRI 206: Anti-competitive behaviour 2016				
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices		In 2021 no legal actions were filed against the company for anti-competitive behaviour, anti-trust, and monopoly practices.	✓
CORPORATE GOVERNANCE				
GRI 3: Material topics 2021				
3-3	Management of material topics	64-66		✓
GRI 201: Economic performance 2016				
201-1	Direct economic value generated and distributed	Consolidated Financial Statements 2021 (p. 5) 21, 24, 73, 95		✓
201-2	Financial implications and other risks and opportunities due to climate change	47-50		✓
201-3	Defined benefit plan obligations and other retirement plans	Consolidated Financial Statements 2021 (Note 4.2.M)		✓
201-4	Financial assistance received from government	73		✓
RESPONSIBLE TAXATION				
GRI 3: Material topics 2021				
3-3	Management of material topics	70-73		✓
GRI 207: Tax 2019				
207-1	Approach to tax	70-72		✓
207-2	Tax governance, control and risk management	72		✓



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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
207-3	Stakeholder engagement and management concerns related to tax	70-71		✓
207-4	Country-by-country reporting	72-73	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.	✓

SUSTAINABLE SUPPLY CHAIN

GRI 3: Material topics 2021

3-3	Management of material topics	82-87		✓
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GRI 204: Procurement impacts 2016

204-1	Proportion of spending on local suppliers	83		✓
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GRI 308: Supplier Environmental Assessment 2016

308-1	New suppliers that were screened using environmental criteria	82-87		✓
308-2	Negative environmental impacts in the supply chain and actions taken	82-87		✓

GRI 414: Supplier Social Assessment 2016

414-1	New suppliers that were screened using social criteria	82-87		✓
414-2	Negative social impacts in the supply chain and actions taken	82-87		✓

CUSTOMER SATISFACTION

GRI 3: Material topics 2021

3-3	Management of material topics	77-79		✓
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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 416: Customer Health and Safety 2016				
416-1	Assessment of the health and safety impacts of product and service categories	78-79		✓
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	78-79		✓

GRI 417: Marketing and Labelling 2016

417-1	Requirements for product and service information and labelling	77		✓
417-2	Incidents of non-compliance concerning product and service information and labelling		During 2021, there is no record of any notification being received on non-compliance concerning product and service information and labelling.	✓
417-3	Incidents of non-compliance concerning marketing communications		During 2021, there is no record of any notification being received on non-compliance of regulations or voluntary codes relating to marketing communications.	✓

CYBERSECURITY

GRI 3: Material topics 2021

3-3	Management of material topics	81		✓
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GRI 418: Customer Privacy 2016

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	81		✓
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LOCAL DEVELOPMENT

GRI 3: Material topics 2021

3-3	Management of material topics	90-92		✓
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GRI Stan- dard	Content	Pages	Direct response or omission	External verifica- tion
GRI 203: Indirect Economic Impacts 2016				
203-1	Infrastructure investments and services supported	91-92		✓
203-2	Significant indirect economic impacts	96-97		
COMMUNITIES				
GRI 3: Material topics 2021				
3-3	Management of material topics	93-95		✓
GRI 413: Local Communities 2016				
413-1	Operations with local community engagement, impact assessments, and development programmes	93-95		✓
413-2	Operations with significant actual and potential negative impacts on local communities	93-95		✓

LAW 11/2018 CONTENT INDEX

Questions addressed by Spanish Law 11/2018 on the disclosure of non-financial and diversity information: material topics for ACCIONA Energía and reporting criteria

		Section	GRI Standards Reporting Criteria	Pages
GENERAL TOPICS				
Business Model	Brief description of the group's business model	Only in renewables	GRI 2-6	9-10
	Markets where it operates	Only in renewables	GRI 2-1	11
	Organisational objectives and strategies	Only in renewables	GRI 2-6	8-10
	Key factors and trends that could affect the future outlook	Only in renewables	GRI 2-6	10
General	Reporting framework	About this Report	GRI 2-6	106
Management Approach	Description of applied policies	Degree of fulfilment f commitments	GRI 2-23 GRI 2-24	13, 20
	Results of these policies	Degree of fulfilment of commitments	GRI 3-3	14-16
	Main risks related to those aspects linked to the group's activities	Degree of fulfilment of commitments	GRI 2-16	20
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	60-61
	Environmental assessment or certification procedures	Planet positive	GRI 3-3	60-61
	Resources dedicated to the prevention of environmental risks	Planet positive	GRI 3-3	60-61
	Application of the precautionary principle	Planet positive	GRI 3-3	60-61
	Number of provisions and guarantees for environmental risks	Planet positive	GRI 3-3	61
Pollution	Measures to prevent, reduce or repair carbon emissions	Planet positive	GRI 305-5	47

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		Section	GRI Standards Reporting Criteria	Pages
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)	55-57
	Actions to combat food waste	Planet positive	-	See note <sup>12</sup>
Sustainable use of resources	Water usage and water supply according to local constraints	Planet Positive and Annex of itemized indicators	GRI 303-5 (version 2018)	54-55, 117
	Consumption of raw materials and measures taken for more efficient use	Planet positive	GRI 303-1	55-57
	Direct and indirect energy consumption	Planet positive	GRI 302-1	53
	Measures taken to improve energy efficiency	Planet positive	GRI 302-4	47
	Use of renewable energies	Planet positive	GRI 302-1	53
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	47, 51-52
	Measures taken to adapt to the consequences of climate change	Planet positive	GRI 201-2 TCFD <sup>13</sup>	46-49
	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	46-47
Protecting biodiversity	Steps taken to preserve or restore biodiversity	Planeta positivo	GRI 304-3	57-60
	Impacts caused by activities or operations in protected areas	Planeta positivo	GRI 304-1	58

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, 29, 109 -110
	Total number and breakdown of types of employment contracts	Annex of itemized Indicators	GRI 2-7 GRI 405-1	109
	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	110

<sup>12</sup> Due to the nature of ACCIONA Energía's business and based on the materiality study, the information on "food waste" is not considered relevant to this report.  
<sup>13</sup> 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).

		Section	GRI Standards Reporting Criteria	Pages
Organisation of work	Number of terminations by gender, age and professional category	Annex of itemized Indicators	GRI 401-1	110
	Gender pay gap	People centric and Annex of itemized Indicators	GRI 405-2	26-27, 111-112
	Disaggregated average salaries and their evolution by gender, age, professional category or equal value	People centric and Annex of itemized Indicators	GRI 405-2	26-27, 111-112
	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	111-112
	Implementation of workplace disconnection policies	People centric	GRI 3-3	31-32
	Employees with disabilities	People centric	GRI 405-1	30-31
	Working hours organisation	People centric	GRI 3-3	31-32
	Hours of absenteeism	People centric	GRI 403-9 (Version 2018)	32
	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	31-32, 111-112
	Health and safety conditions in the workplace	People centric	GRI 403-1 GRI 403-2 GRI 403-3 GRI 403-7 (Version 2018)	33-36
Health and safety	Workplace accidents, in particular frequency and severity, disaggregated by gender	People centric	GRI 403-9 GRI 403-10 (Version 2018)	34, 35
	Occupational diseases, disaggregated by gender	People centric	GRI 403-9 GRI 403-10 (Version 2018)	35
	Dialogue in the workplace, including procedures to inform, consult and negotiate with employees.	People centric	GRI 3-3	38
Labour relations	Percentage of employees covered under collective bargaining agreement, by country	People centric	GRI 2-30	38
	The balance of collective bargaining agreements, particularly in the areas of occupational health and safety	People centric	GRI 403-3	35-36

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		Section	GRI Standards Reporting Criteria	Pages
Training	Training policies implemented	People centric	GRI 404-2	36-37
	Total hours of training per professional category	People centric and Annex of itemized Indicators	GRI 404-1	111
Accessibility	Universal accessibility for people with disabilities	People centric	GRI 3-3	30-31
Equality	Measures taken to promote equal treatment and opportunities for women and men	People centric	GRI 3-3	29-31
	Equality plans (Chapter III of Organic Law 3/2007, of 22 March on effective equality for men and women)	People centric	GRI 3-3	29
	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	29-31
	Policy against all types of discrimination and, where appropriate, diversity management.	People centric	GRI 3-3	29-31
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	39-42, 70
	Human rights violations reported	People centric	GRI 406-1	41
	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 content index	GRI 406-1 GRI 407-1 GRI 408-1 GRI 409-1	38
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	67
	Measures for the prevention of money laundering	Exponential Leadership	GRI 3-3 GRI 205-2	68

		Section	GRI Standards Reporting Criteria	Pages
	Contributions to foundations and non-profit organisations	Exponential leadership	GRI 2-28 GRI 201-1	69
INFORMATION ABOUT SOCIETY				
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	90-92
	The impact of the company's operations on local resident and the territory	Integrate to transform	GRI 413-1 GRI 413-2	93-97
	Relations with key members of local communities and ways of dialogue with them	Integrate to transform	GRI 2-29 GRI 413-1	93-94
	Partnership and sponsorship actions	Integrate to transform	GRI 201-1	95-96
Subcontracting and suppliers	Inclusion of social, gender equality and environmental issues in the procurement policy	Exponential leadership	GRI 308-1 GRI 414-1	82-87
	Consideration of social and environmental responsibility in relations with suppliers and subcontractors	Exponential leadership	GRI 308-1 GRI 414-1	82-87
	Supervision systems and audits and their result	Exponential leadership	GRI 308-1 GRI 414-1	85-86
Consumers	Measures to promote consumer health and safety	Exponential leadership	GRI 416-1	78-79
	Complaint procedures, complaints received and complaint resolution	Exponential leadership	GRI 418-1	77-78
Tax Information	Profits earned country-by-country	Exponential leadership	GRI 201-1	73
	Corporate income tax paid	Exponential leadership	GRI 207-4	73
	Public grants received	Exponential leadership	GRI 201-4	73
REQUIREMENTS OF THE TAXONOMY REGULATION		Planet positive and Annex of itemized Indicators	Regulation (EU) 2020/852	45-46 112-116

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CONTENT INDEX ACCORDING TO THE RECOMMENDATIONS OF THE TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES (TCFD)

ACCIONA Energía 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 management’s role in assessing and managing climate-related risks and opportunities.	13, 20, 47-50
	Describe the board’s oversight of climate-related risks and opportunities.	13, 20, 46-47
Strategy	Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	48-50
	Describe the impact of climate-related risks and opportunities on the organisation’s businesses, strategy, and financial planning.	47-50
	Describe the resilience of the organisation’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	47-48
Risk Management	Describe the organisation’s processes for identifying and assessing climate-related risks.	48-49
	Describe the organisation’s processes for managing climate-related risks.	47-48
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation’s overall risk management.	47-48
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.	50
	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	50-52
	Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	47-48

INDEPENDENT ASSURANCE REPORT



KPMG Asesores, S.L.  
Pº de la Castellana, 259 C  
28046 Madrid

Independent Assurance Report on the Sustainability Report of Corporación ACCIONA Energías Renovables, S.A. and subsidiaries for 2021

(Translation from the original in Spanish. In the event of discrepancy, the Spanish language version prevails.)

To the Shareholders of Corporación ACCIONA Energías Renovables, S.A.:

We have been engaged by Corporación ACCIONA Energías Renovables, S.A. management to perform a limited assurance review of the accompanying Sustainability Report (hereinafter, the Report) of Corporación ACCIONA Energías Renovables, S.A. (hereinafter, the Parent) and subsidiaries (hereinafter, the Group) for the year ended 31 December 2021 which included the Consolidated Non-Financial Information Statement (hereinafter, NFIS) of the Group which forms part of the Group’s consolidated Directors’ Report for 2021.

Scope of our review

The scope of our review of the contents of the Report is as follows:

- a. We have performed a reasonable assurance review of the preparation and disclosure of the indicators included in the Report related to GRI 102-8, GRI 102-41, GRI 202-1, GRI 202-2, GRI 204-1, GRI 302-1, GRI 304-1, GRI 305-1, GRI 305-2, GRI 305-3, GRI 305-4, GRI 305-7, GRI 401-1, GRI 401-3, GRI 403-1, GRI 403-4, GRI 404-1, GRI 404-2, GRI 404-3, GRI 405-1, GRI 405-2, GRI 410-1, GRI 412-2, in accordance with the Comprehensive option of the Sustainability Reporting Standards of the Global Reporting Initiative (hereinafter the GRI Standards), as described in point 102-54 of the GRI Content Index of the Report.
- b. We have conducted a limited assurance review of the preparation and disclosure of the remaining GRI indicators in the Report, which are not included in the list in the preceding point, in accordance with the GRI Standards, as described in point 102-54 of the GRI Content Index of the Report.
- c. Furthermore, pursuant to article 49 of the Spanish Code of Commerce, we have conducted a limited assurance review of the NFIS of the Group for the year ended 31 December 2021, included in the Report, in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area in the table “Law 11/2018 Content Index”, the recommendations made by the Task Force on Climate-Related Financial Disclosures (hereinafter, TCFD) for reporting on climate change and the 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 investments (hereinafter, Regulation (EU)) in relation to alignment indicators that have been voluntarily included in the NFIS.

The Report includes additional information to that required under the GRI Standards: Comprehensive option and under prevailing mercantile legislation on non-financial information, which we have not reviewed. Our work was limited exclusively to review the information identified in the “GRI Content Index” and “Law 11/2018 Content Index” tables included in this Report.

KPMG Asesores S.L., a limited liability Spanish company and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. Paseo de la Castellana, 259C – Torre de Cristal – 28046 Madrid

Reg. Mer Madrid, T. 14.972, F. 53, Sec. 8, H. M -249.480, Inscrp. 1.ª N.I.F. B-82496650



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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 part of the Group’s consolidated Directors’ Report for 2021. The NFIS has been prepared in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area in the “Law 11/2018 Content Index” table of the aforementioned Report, the recommendations of the TCFD for reporting on climate change and the Regulation (EU) in relation to alignment indicators that have been included voluntarily in the NFIS.

Management of the Parent is responsible for the preparation and presentation of the rest of the contents of the Report in accordance with the GRI Standards, in its comprehensive option, in accordance with each subject area in the “GRI Content Index” table 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 Parent’s Directors are also responsible for defining, implementing, adapting and maintaining the management system through which they obtain the necessary information to prepare the Report.

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 International Standard on Quality Control 1 (ISQC1) and accordingly maintains a comprehensive system of quality control including documented 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, within the different scopes determined in the “Scope of our review” section in this Report.

We conducted our review engagement in accordance with the current Revised International Standard on Assurance Engagements 3000, “Assurance Engagements Other than Audits or Reviews of Historical Financial Information” (Revised ISAE 3000), 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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Reasonable assurance review of GRI indicators

The Reviewed ISAE 3000 requires that we plan and perform our procedures to obtain reasonable assurance about whether the indicators described in point a) of the “Scope of our review” section of this Report have been prepared and disclosed, in all material respects, in accordance with the GRI Standards.

Our reasonable assurance review is subject to our professional judgement and includes an assessment of the risks arising from material misstatement of these indicators, whether due to fraud or error.

In making these risk assessments, we have considered internal control relevant to the preparation and disclosure of the indicators with reasonable assurance, in order to design appropriate review procedures, but not to reach a conclusion on the effectiveness of the Group’s internal control over the preparation and presentation of the Report.

Our engagement included an assessment of compliance of the indicators with the criteria of the GRI Standards, gaining an understanding of the procurement of financial and non-financial information from its source, evaluating the reasonableness of the estimates drawn up by the Group and recalculating the indicators subject to a reasonable assurance review.

Reasonable assurance is less than total assurance.

Limited assurance review of information

The Revised ISAE 3000 requires that we plan and perform our procedures so as to obtain limited assurance on whether:

- The indicators described in point b) of the section on “Scope of our review” of this Report have been prepared and presented, in all material respects, in accordance with the GRI Standards, as described in point 102-54 of the GRI Content Index.
- the NFIS referred to in point c) of the section on “Scope of our review” of this Report has been prepared, in all material respects, in accordance with prevailing mercantile legislation, the criteria of the chosen GRI Standards, in accordance with each subject area in the “Law 11/2018 Content Index” table of the Report, the TCFD’S recommendations for Reporting on climate change and the Regulation (EU) in relation to alignment indicators.

The procedures selected depend on our knowledge of the various types of information included in the Report and other circumstances of the engagement, and our assessment of the areas in which material misstatements are likely to arise.

The procedures performed in a limited assurance engagement are different, owing to their nature and timing, from those used in a reasonable assurance engagement, and their scope is less. Consequently, the level of assurance obtained in a limited assurance engagement is substantially less than that which would have been obtained in a reasonable assurance engagement.

Our work on the information for limited assurance consisted of making enquiries of management and of the different units and areas in charge 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 personnel of the Group to gain an understanding of the business model, policies and management approaches applied, and the principal risks related to these matters, and to ascertain the existence of a sustainability strategy and policies to address risks and their application at all levels within Corporación ACCIONA Energías Renovables, thereby 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 Parent and described in the “Materiality analysis” section, considering the content required by prevailing commercial legislation.
- Review of information on the risks, policies and management approaches applied in relation to the material aspects presented in the Report for 2021, in accordance with the requirements of the GRI Standards
- Review on management approaches and on the compliance with the recommendations made by the TCFD for reporting on climate change in the presentation of information on management’s approach to climate risks.
- Review of the alignment indicators of the Regulation (EU) in accordance with the criteria and procedures defined by the Parent.
- Analysis of the processes for compiling and validating the data presented in the Report for 2021.
- Corroboration, through sample testing, of the information relative to the content of the Report for 2021 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 tallies with our general knowledge and experience of Corporación ACCIONA Energías Renovables’s performance regarding sustainability.
- Contrasting of the financial information reflected in the Report and that included in the 2021 consolidated annual accounts of Corporación ACCIONA Energías Renovables, audited by independent third parties.
- Review of the reporting process for environmental and health and safety information from the source through on-site visits and online reviews of two work centres selected on the basis of a risk analysis and quantitative and qualitative criteria.
- Procurement of a representation letter from the Directors and management.

Conclusions

Our conclusions are based on and 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.



(Translation from the original in Spanish. In the event of discrepancy, the Spanish language version prevails.)

Conclusion of our reasonable assurance review of GRI indicators

In our opinion, the indicators included in the Report under the following denominations GRI 102-8, GRI 102-41, GRI 202-1, GRI 202-2, GRI 204-1, GRI 302-1, GRI 304-1, GRI 305-1, GRI 305-2, GRI 305-3, GRI 305-4, GRI 305-7, GRI 401-1, GRI 401-3, GRI 403-1, GRI 403-4, GRI 404-1, GRI 404-2, GRI 404-3, GRI 405-1, GRI 405-2, GRI 410-1, GRI 412-2, have been prepared and presented, in all material respects, in accordance with the GRI Standards, as described in point 102.54 of the “GRI Content Index” table of the Report.

Conclusion of our limited assurance review of information

Based on the procedures performed and the evidence obtained, no matters have come to light that causes us to believe that:

- a) the indicators described in point b) of the section on “Scope of our review” and the “GRI Content Index” table of the Report have not been prepared and presented, in all material respects, in accordance with the GRI Standards: Comprehensive option, as described in point 102-54 of the GRI Content Index.
- b) the NFIS of Corporación ACCIONA Energías Renovables, S.A. and subsidiaries for the year ended 31 December 2021, has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and with the criteria of the GRI Standards selected in accordance with each subject area in the “Law 11/2018 Content Index” table of the Report and the TCFD’s recommendations for reporting on climate change and the Regulation (EU) in relation to 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 in relation to climate change mitigation and climate change adaptation. This obligation applies for the first time for the 2021 fiscal year, provided that the Non-Financial Information Statement is published from 1 January 2022 onwards. In addition, only the alignment indicators for 2021 according to the Regulation (UE) have been voluntarily disclosed in the accompanying Sustainability Report. Consequently, the attached Sustainability Report does not contain comparative information on this matter. Additionally, certain information has been included in respect of which the Directors of the Parent have opted to apply the criteria that, in their opinion, best allow them to comply with the new obligation, and which are those defined in section “Planet Positive-European taxonomy of environmentally sustainable economic activities” in the accompanying Sustainability Report. Our conclusion is not modified in respect of this matter.

Use and distribution

In accordance with the terms and conditions of our engagement letter, this Report has been prepared for Corporación ACCIONA Energías Renovables, S.A. in relation to its 2021 Sustainability Report and should therefore not be used for any other purpose or used in any other context.

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This Report on the Consolidated NFIS 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  
23 February 2022



## SUSTAINABILITY REPORT 2021

NON-FINANCIAL INFORMATION STATEMENT **2021**