2025

Modern Slavery Joint Statement

A joint statement for ACCIONA Energy Australia Global Pty Ltd and ACCIONA Energy Oceania Construction Pty Ltd

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1. About this statement

This Joint Modern Slavery Statement (**Statement**) is prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (**Act**) for the period 1 January 2025 to 31 December 2025 (**Reporting Period)**. The Statement addresses how we identify, assess and address modern slavery risks within our operations and supply chains. The Statement forms part of our ongoing reporting obligations to be read alongside the ACCIONA Energía annual Sustainability Report 2025 (**Sustainability Report**). In particular, this Statement addresses:

- our commitment to supply chain transparency;
- the steps we have taken to identify, assess and address risks of modern slavery; and
- the effectiveness of our modern slavery policies.

This joint Modern Slavery Statement is prepared by ACCIONA Energy Australia Global Pty Ltd (ACN 600 910 647) (**AEAG**) and ACCIONA Energy Oceania Construction Pty Ltd (ACN 164 011 723) (**AEOC**) (collectively referred to as the **Reporting Entities**). AEOC is a wholly owned subsidiary of AEAG. AEAG is a wholly owned subsidiary of ACCIONA Energía Global S.L (**ACCIONA Energía Global**). ACCIONA Energía Global is a subsidiary of Corporación ACCIONA Energías Renovables, S.A. (**ACCIONA Energía**) which is majority owned by ACCIONA S.A (**ACCIONA SA**).

This Statement uses the term "ACCIONA Group" to refer to all the ACCIONA entities that are owned by ACCIONA SA, inclusive of ACCIONA Energía and the Reporting Entities.

All references to our, we, us and ACCIONA Energía refer to ACCIONA Energía and its subsidiaries, including the Reporting Entities.

All references to a year refer to the period 1 January 2025 to 31 December 2025 unless otherwise stated. All monetary values refer to Australian dollars (AUD$) unless otherwise stated. Where financial reporting values been converted, monetary values are based on the assumed exchange rate as of 9 April 2026: AUD$1: EURO€0.60.

The Reporting Entities (both of which are Australian incorporated companies) adopt the policies and standards of ACCIONA Energía, and global guidelines inform local procedures.

1.1 Definition of Modern Slavery

The definition of modern slavery in the Act is adopted in this Statement. According to the Act, modern slavery generally includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking of persons, deceptive recruitment practices for labour/services and the worst forms of child labour.[1]

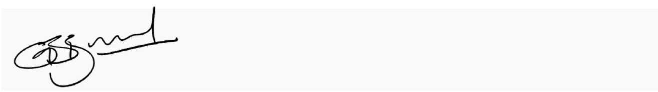
1.2 Consultation

AEAG owns 100% of the issued share capital in ACCIONA Energy Oceania Financial Services Pty Ltd ACN 155 674 347 (**AEOFS**). AEAG consulted with AEOFS in the development of this Statement and provided its Board with a copy of this Statement. Otherwise, the Reporting Entities do not own or control any other companies or corporate entities.

This Joint Statement has been approved by the Board of Directors of the Reporting Entities. Gavin Reymond, as a Director of each Reporting Entity, was authorised to sign this Statement on behalf of AEAG and AEOC.

Feedback

If you have any feedback or requests for further information, please contact **energy.compliance.au@acciona.com**



Gavin Reymond
Managing Director of ACCIONA Energía Australia
Director, ACCIONA Energy Australia Global Pty Ltd
Director, ACCIONA Energy Oceania Construction Pty Ltd

[1] Modern Slavery Act 2018 (Cth), section 4.

"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, partners, competitors, customers, local communities and society in general"

acciona energía

ACCIONA Energía Human Rights Policy

2. Introduction

2.1 About ACCIONA Energía

ACCIONA Energía is a global group of companies that develop and manage sustainable infrastructure solutions, especially in renewable energy. With commercial operations in 22 countries, a diverse workforce of 3,134 employees from 55 nationalities and sales of $5.11 billion in 2025, we are committed to contributing to a low carbon future while providing economic and social benefit to the communities in which we operate. We are recognised as one of the best companies to work for across the world. ACCIONA Energía has retained the Top Employers Institute's *Top Employer* certification in Australia, Spain, Canada, the United States, Brazil, Mexico, South Africa, Chile, Peru, the Philippines and Portugal. ACCIONA Energía has been awarded the Enterprise Seal for the second time, a distinction granted to companies certified as a Top Employer in at least 10 countries representing more than 95% of their global workforce. Only 12 companies in the world have received this recognition.

We design, construct and supply a range of clean energy technologies and solutions. These include wind, photovoltaic solar and battery storage. We are highly integrated in other aspects of the renewable value chain, such as finance, maintenance and marketing.

Given the all-pervading nature of our supply chains, we are acutely aware of the risks of modern slavery that may be present in our supply chains through our suppliers, contractors and collaborators. We are committed to mitigating such risks. We believe that all companies, especially those that operate globally, must act in order to minimise the risk of modern slavery in their supply chains.

As such, we reaffirm our continuing commitment to defending human rights as a guiding principle in our business activity.

2.2 Our Commitment to International Standards

ACCIONA Energía respects and adopts the values included in the main international standards for the protection of human rights:

- the United Nations Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the Declaration on Fundamental Principles and Rights at Work from the International Labour Organisation (**ILO**) and its fundamental conventions;
- the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- the Guidelines for Multinational Enterprises from the Organization for Economic Co-operation and Development (**OECD**);
- the United Nations Convention on the Rights of the Child;
- the United Nations Global Compact;
- the Seoul Declaration on Safety and Health at Work;
- the United Nations Declaration on the Rights of Indigenous Peoples; and
- the ILO's Indigenous and Tribal Peoples Convention.

Further, ACCIONA Energía prioritises progress towards achieving the United Nations' Sustainable Development Goals **(SDG**) and is aligned with the United Nations Guiding Principles on Business and Human Rights (as noted above), as well as the Voluntary Principles on Security and Human Rights. The aforementioned frameworks are fundamental to managing human rights due diligence and reflect a responsibility and respect-based approach that ACCIONA Energía promotes throughout its value chain.

2.3 Sustainability at ACCIONA Energía

Since 2010, the ACCIONA Group's sustainability strategy has been articulated through its Sustainability Master Plan, renewed every five years. ACCIONA Energía's current five-year Sustainability Master Plan 2025 (**SMP2025**) was structured around four central pillars:

1. People at the Centre;
2. Planet Positive;
3. Integrate to Transform; and
4. Exponential Leadership.

The final achievements against each of the objectives are detailed in the Sustainability Report 2025, published in May 2026 and covering the 2025 calendar year. The Report sets out how ACCIONA Energía is contributing to sustainable outcomes and positive impacts for our people and the communities within which we operate. The outcomes in the Sustainability Report are independently verified by KPMG.

Importantly, we have increased the number of ESG audits of Tier 1 and Tier 2 suppliers, and our Social Safeguards Internal Control System has been enriched by independent third-party audits of projects in accordance with ILO Conventions and other international reference standards.

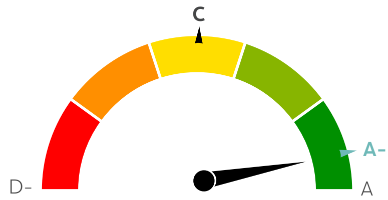
In recognition that sustainability is not a standalone function but an integral part of the company's business strategy for competitive advantage, the new five-year sustainability objectives will be known as the Integrated Strategy Master Plan (**iSMP2030**). The iSMP2030 Framework has been developed and is pending approval. In the coming months, strategic business plans and detailed action plans will be rolled out to guide effective implementation of the strategy over the next five years.

ACCIONA Energía has been assessed by various ESG analysts. As of year-end 2025, the current ratings are as follows:

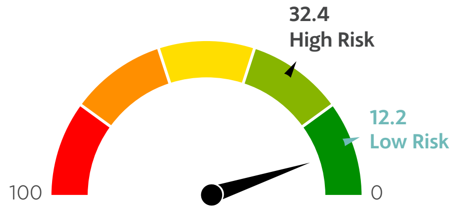
▲ Industry Average ▲ ACCIONA Energía 2025 Score

CDP
Industry: Utilities

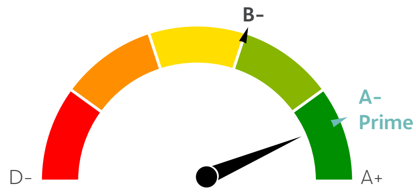
SUSTAINALYTICS
Industry: Elec. Utilities



ISS ESG
Industry: Renewable Power



ecovadis
Industry: Renewable Power



EthiFinance
Industry: Electricity, gas, steam and air conditioning supply

3. Structure, Operations and Supply Chains

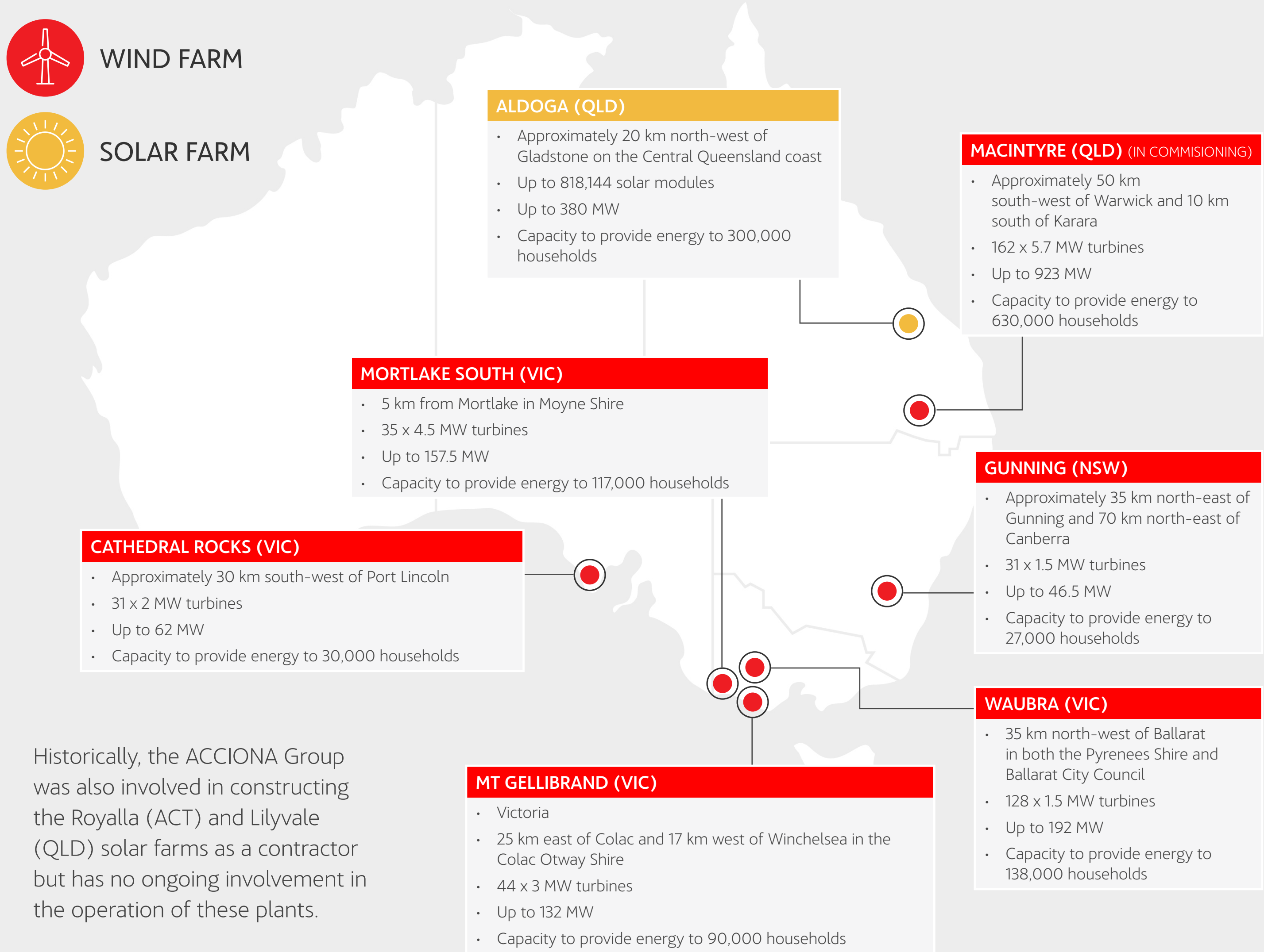
3.1 Structure

ACCIONA Energía has been operational in Australia for over 20 years. We have offices in Victoria, Queensland, New South Wales, and Western Australia.

3.2 Operations

Our operations in Australia focus largely on wind and photovoltaic (PV) solar renewable energy projects. Through our operations we have generated $186.2 million in sales in 2025. As at the end of the reporting period, we directly employed 285 people in Australia, with 33 of those recruited in 2025. If we include indirect employment through contractors on our construction projects, this figure is over 1000 people.

As of the date of this Statement, ACCIONA Energía is operating five wind farms and one PV solar farm in Australia with a total installed capacity of nearly 1000 MW. One wind farm is currently in the commissioning phase in Queensland.



Historically, the ACCIONA Group was also involved in constructing the Royalla (ACT) and Lilyvale (QLD) solar farms as a contractor but has no ongoing involvement in the operation of these plants.

3.3 Supply chain

In 2025, AEAG engaged with 334 Tier 1 suppliers, with purchases totalling $72.3 million. We are integrated in the entire value chain for renewable energy projects. Our supply chain is necessarily diverse, extensive, and complex.

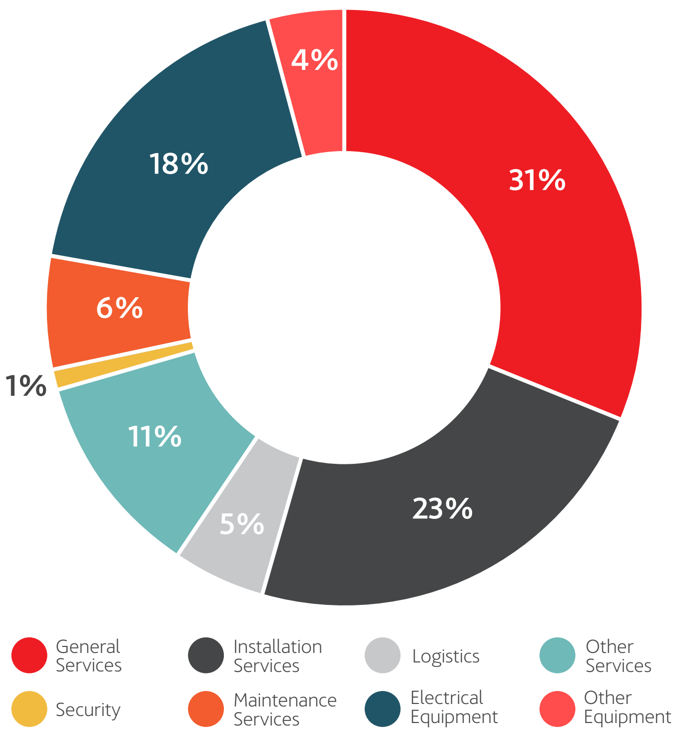
ACCIONA Energía's suppliers are classed as "Tier 1" suppliers when they directly supply ACCIONA Energía. Suppliers to our Tier 1 suppliers are classed as "Tier 2" suppliers. The tiering system continues down the supply chain.

In some circumstances, our Tier 1 suppliers are related entities within the ACCIONA Group. In such instances, our Tier 2 supplier would be the Tier 1 supplier of our related entity.

ACCIONA Energía defines a strategic supplier as one whose annual commercial relationship is worth more than $662,592. Globally, 23.03% of ACCIONA Energía's supply chain meets the definition of strategic supplier, accounting for 93.19% of purchases in 2025.

Suppliers headquartered in Australia accounted for 93% of purchases by the Reporting Entities in 2025. Twenty-two of our Tier 1 suppliers in 2025 have overseas headquarters, including suppliers of main components such as wind turbines, photovoltaic panels, and cables. The majority of these suppliers are located in Spain (16 suppliers), with others located in China (1 supplier), India (1 supplier), Great Britain (2 suppliers) and the United States (2 suppliers).

TIER 1 SUPPLIERS



3.4 Modern Slavery Supply Chain Risks

The risks of modern slavery in the renewable energy industry are well documented. The resources necessary for many renewable energy products are often sourced from parts of the world that are impacted by conflict, weak governance, low incentive for worker protection and/or state-imposed forced labour.[2] The future of our clean energy transition is at risk if it is built on the exploitation of communities and people. Ignoring modern slavery in these supply chains will erode the benefits of the transition to renewable energy.

Within our own countries of operation, ACCIONA Energía has identified the risk of child or forced labour in countries such as the Dominican Republic, Ukraine, India, Peru and Egypt. This brings a risk of complicity with inappropriate practices among subcontracted workers, as well as risks in the supply chain.

Solar photovoltaic (**PV**) supply chains are among the highest-risk clean energy supply chains for modern slavery. A significant share of the world's solar-grade polysilicon, an essential input for most PV modules, has been produced in the Xinjiang Uyghur Autonomous Region (**XUAR**) in China.[3] Multiple governments, UN bodies and academic investigations have established credible evidence of state-imposed forced labour in XUAR, particularly affecting Uyghur Muslims.[4]

There are similar modern slavery risks with respect to the supply of materials for wind farm projects. These risks apply to the windfarm industry as a whole and are not specific to ACCIONA Energía. Nonetheless, ACCIONA Energía is aware of, and is vigilant with respect to these risks.

Furthermore, renewable energy companies increasingly rely on battery energy storage systems. This drives demand for critical minerals such as cobalt, lithium, nickel and graphite. Renewable energy companies can be indirectly linked to modern slavery in cobalt mining in the Democratic Republic of Congo.

During 2025, ACCIONA Energía reinforced contractual commitments required of PV module suppliers. Contracts included explicit obligations for suppliers to ensure compliance with ILO international standards, implement adequate management systems and conduct due diligence on their own suppliers in order to prevent potential breaches and identify potential risks early. These commitments are complemented by specific traceability requirements, aimed at knowing the origin of critical

[2] Source: Beyond Compliance in the Renewable Energy Sector | Walk Free WalkFree, 2023.
[3] Source: Global push for clean energy exposes rising modern slavery risks in supply chains | Walk Free, 2025
[4] Source: Unshackling workers in China's solar supply chain | East Asia Forum: 2024

materials used in modules, in particular, metallurgical grade silicon and polysilicon. Suppliers must provide verifiable information on the journey of materials and submit to external independent verification mechanisms.

Our Commitment to Improvement: Continuous Analysis

ACCIONA Energía is committed to continuously analysing its impact on communities around the world. In 2025, ACCIONA Energía completed its fourth Dual Materiality Analysis (**DMA**) which, among other aspects, assesses the company's significant effects on the workers in its supply chain. The results of the DMA were used to identify material risks in our supply chain and inform any changes that need to be made.

Using a series of metrics covering over 300 sites around the world, ACCIONA Energía identified that the primary modern slavery risks in its supply chain relate to:

1. forced labour in China; and
2. child labour in the extraction of minerals necessary for renewable energy.

Further, ACCIONA Energía recognises two main types of risk associated with supply chain processes:

1. Non-compliance by suppliers with ACCIONA Energía's standard conditions; and
2. Contracting of suppliers that present financial or ESG risks in any of their areas.

Workers in the renewable energy industry supply chain are particularly vulnerable to:

- Forced labour;
- Wage theft;
- Illegal overtime; and
- Hazardous conditions.[5]

Migrant Workers

Modern slavery risks are exacerbated by the high number of vulnerable migrant workers utilised in mineral extraction for renewable technologies.[6] Migrant workers are more likely to have insufficient information about their legal rights and the terms of their employment, which make them prone to exploitation.

High Risk Countries

Circumstances of modern slavery in resource extraction are more likely to occur in jurisdictions where there is little or no protection of workers' rights.

Geopolitical risk scores are based on various indices extracted from Maplecroft, an ESG risk data provider, and GoSupply, our supplier management platform. This allows us to analyse the risk of worker exploitation in each country in terms of human rights, labour conditions and socio-economic level.

[5] Source: WalkFree Beyond Compliance in the Renewable Energy Sector: Assessing UK and Australian Modern Slavery Statements

[6] Source: Walkfree Ipek Gencu, Nathaniel Mason, ODI Migration for climate action: how labour mobility can help the green transition

4. Assessing & Addressing Modern Slavery Risk

ACCIONA Energía sets high standards both internally and for those companies with which we do business, identifying and addressing risks related to modern slavery under a 'Plan – Do – Check – Act' approach.

4.1 Our Commitment to Modern Slavery Risk Management

ACCIONA Energía has standards and policies in place that outline our approach to identifying and mitigating risks of modern slavery, primarily the Code of Conduct, General Policy on Compliance, Human Rights Policy, and Migrant Workers Standard. Our Social Safeguards System ensures that these requirements are being met, and our Ethical Channel provides an avenue for reporting potential breaches of our standards and policies.

4.1(a) ACCIONA Group Code of Conduct

The ACCIONA Energía Code of Conduct (**Code of Conduct**) establishes the values that govern the behaviour of all ACCIONA Energía people and the behaviour of third parties with whom we interact.

The Code of Conduct sets out the standard of conduct that all members of the organisation (including directors, managers, and employees) must exhibit at all times, including when dealing with suppliers and third parties. Employees must expressly accept the standards of conduct set out in the Code of Conduct. The standards of behaviour set out in the Code of Conduct are derived from our commitments to national and international standards. The global Compliance department is available to answer any queries that employees may have about interpreting the Code of Conduct.

The Code of Conduct reinforces our commitment to the principles that guide all individuals and companies associated with ACCIONA Energía. These principles include, among other things, respect for human rights, promoting fair and safe working conditions, contributing to social development, and considering the interests of the local communities in which they operate.

The Code of Conduct outlines the following baseline commitments:

- ensuring fair working conditions, work hours and wages;
- outrightly rejecting child and forced labour wherever it operates; and
- exclusively collaborating with third parties that respect human rights, refusing to cooperate with any entity that violates them.

We encourage other entities such as suppliers, contractors, collaborators, and other partners to accept and act in accordance with the principles set out in the Code of Conduct.

4.1(b) General Policy on Compliance

The purpose of the General Policy on Compliance (**GPC**) is to reflect the commitment of ACCIONA Energía to act pursuant to the values of sustainability, transparency, honesty and integrity. The GPC was implemented on 12 November 2025, replacing the previous Crime Prevention and Anti-Bribery Policy.

The GPC establishes a general framework for ACCIONA Energía's ethical compliance system by defining the steering principles of responsible action. The GPC is based on the following principles:

1. Culture of ethics and compliance – ACCIONA Energía always acts in accordance with local law and within the framework established by the Code of Conduct promoting a culture of prevention based on the principle of zero tolerance for irregular actions and acts that are contrary to the law or our internal and external rules;
2. Leadership and commitment – ACCIONA Energía has a model of governance with bodies and committees that are assigned certain compliance-related powers. Directors and executive management of ACCIONA Energía companies take an active leadership role in consolidating a culture of compliance; and

Integrity in third-party relations – ACCIONA Energía establishes relationships with third parties (i.e. customers, suppliers, government authorities) on the basis of lawfulness, transparency and professional ethics. The organisation has due diligence processes to ascertain, evaluate and manage risks stemming from third-party relationships. Different procedures are adopted depending on the level of risk and nature of a relationship (for example, with suppliers, customers or business partners). Monitoring procedures are based on industry-standard tools.

4.1(c) Human Rights Policy

ACCIONA Energía companies are also subject to ACCIONA Energía's Human Rights Policy (**Human Rights Policy**), identical to the ACCIONA Group policy but specifically approved by our board of directors. The Human Rights Policy establishes the framework for the protection and promotion of Human Rights and fundamental freedoms in all of the organisation's activities, and is implemented so that ACCIONA Energía aligns itself with the principles and objectives of the major international agreements and conventions on human rights, such as the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the UN Global Compact (among others).

The Human Rights Policy applies to all ACCIONA Energía companies in which ACCIONA Energía exercises control of management, regardless of geographic location. It applies to all directors and managerial employees, regardless of their position. To the extent that ACCIONA Energía does not exercise control over the management of a company but has an equity stake, it will ensure that ACCIONA Energía representatives promote the adoption of the Human Rights Policy.

ACCIONA Energía also promotes the adoption of the Human Rights Policy by its suppliers, contractors and collaborators.

Among the obligations contained in the Human Rights Policy is the 'prohibition of forced labour and modern slavery'. ACCIONA Energía companies are prohibited from engaging forced labour, any form of modern slavery or trafficking in persons in accordance with the Forced Labour Convention and the Abolition of Forced Labour Convention. Furthermore, ACCIONA Energía companies undertake not to employ children under the age of 18 and strictly prohibit the use of child labour in accordance with the Minimum Age Convention and the Worst Forms of Child Labour Convention.

ACCIONA Energía prohibits any kind of work under threat and requires that workers do not pay undue fees or costs. Employment agencies must comply with these principles.

The Human Rights Policy is available to the public on our website: https://www.acciona-energia.com/shareholders-investors/corporate-governance/compliance

In countries where national legislation or regulation may conflict with compliance with the Human Rights Policy, ACCIONA Energía is committed to establishing relevant risk control and mitigation mechanisms.

4.1(d) Migrant Workers Standard

ACCIONA Energía implements a Standard on Migrant Workers Welfare: Recruitment, Employment and Accommodation (**Migrant Workers Standard**). It sets out the procedures that must be followed to ensure that migrant workers are not exploited. ACCIONA Energía companies and their suppliers, contractors and collaborators must follow the Migrant Workers Standard when dealing with migrant workers.

The Migrant Workers Standard aims to mitigate the unique risk of exploitation that the hiring of migrant workers poses. In order to mitigate against debt bondage risks, migrant workers are not permitted to enter forced savings programmes to pay off recruitment fees or placement fees.

4.1(e) Social Safeguards System

ACCIONA Energía has developed the Internal Control System for Social Safeguards (**ICSSS**) to mitigate ACCIONA Energía's negative impact on human rights. This system is based on internal control models developed by the Committee Sponsoring Organisations of the Treadway Commission (**COSO**). ICSSS integrates within ACCIONA Energía a culture of risk assessment and management of compliance with our international human rights regulations and principles commitments. The ICSSS aims to promote and consolidate a true culture of compliance with and respect for both existing legislation and international human rights standards.

ICSSS is designed to undertake two key objectives:

1. **Identification and assessment of risks**: Identification and assessment of real or potential negative impacts on human rights; and
2. **Prevention and mitigation of risks**: Prevention and mitigation of real or potential negative impacts on human rights.

The ICSSS also includes annual third-party evaluations to ensure ACCIONA Energía meets the highest standards of social sustainability and respect for Human Rights. These audits cover two main areas of assessment, reflecting a comprehensive approach to responsibly managing social impacts and maintaining respect for Human Rights, implementation of Social Impact Management (**SIM**) methodology, and respect for workers' welfare.

The SIM methodology involves compliance with the Corporate Standard for Social Impact Management. Audits assess the application of SIM principles throughout all phases of a project including an evaluation of social risk, budget allocation based on risk, assessment of social impacts and the effectiveness of proposed social measures and their impacts. In addition, the quality and effectiveness of dialogue and communication mechanisms between stakeholders are reviewed. Respect for Human Rights and workers' welfare focuses on ensuring that projects promote fair working conditions, particularly for migrant workers. Audits include the evaluation of compliance with corporate standards related to equal treatment, non-discrimination and harassment, access to complaint and remediation mechanisms, freedom of association and compliance with international standards on child and forced labour. Specific tools such as checklists, wellbeing standards and staff interview guides are used to identify areas for improvement and promote responsible practices.

In 2025, these audits affirmed that projects are rigorously and consistently applying SIM methodology and respect for Human Rights in alignment with ACCIONA Energía's business model and strategy. ACCIONA Energía continues to strengthen its commitment to social sustainability, ensuring that its projects contribute positively to the wellbeing of communities and workers, while promoting continuous improvements of internal processes.

Identification and assessment of risks

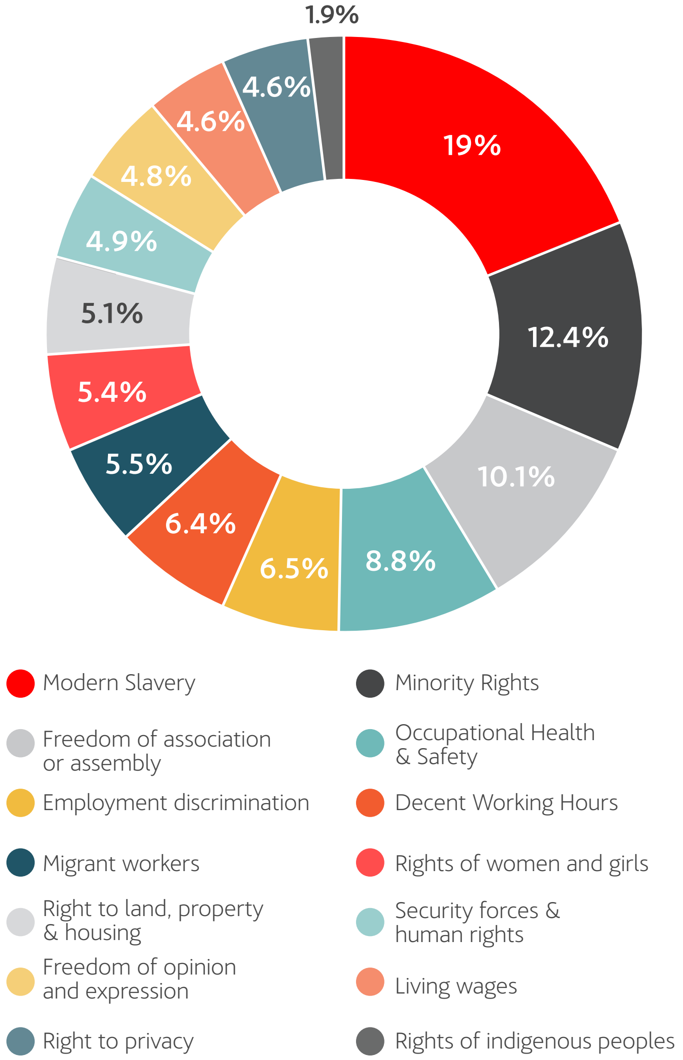
The ICSSS indicators include, among others, the following specific indicators relevant to modern slavery:

- Child labour;
- Forced labour;
- Migrant workers; and
- Human trafficking.

Each of ACCIONA Energía's more than 280 international facilities are assessed individually for real or potential negative impacts on human rights based on these indicators, as part of the annual non-financial risk analysis.

In 2025, this analysis identified that risks relating to modern slavery accounted for 19% of all social sustainability-related risks identified by ACCIONA Energía.

PERCENTAGE OF SOCIAL RISKS



With respect to treatment of workers on site, all Australian sites were rated as low or very low risk for all modern slavery indicators.

Prevention and mitigation of risks

As part of the ICSSS, 'control activities' are carried out on every identified risk of real or potential negative human rights impact to mitigate the relevant risk. There are 80 related control activities resulting from policies, standards, and procedures to defend the principles that define responsible business conduct.

The Sustainability Department updates the risks and controls annually, following the annual monitoring performed by the Internal Audit Department. Detection of real or potential negative impacts on human rights is carried out on a yearly basis under non-financial risk analysis.

The ICSSS is carried out by ACCIONA Energía's Audit and Sustainability Committee. The Audit and Sustainability Committee uses the ACCIONA-Risk Management System / MetricStream tool (**ACCIONA RMS**) to monitor risks and make recommendations and action plans to mitigate identified risks. Training is provided to both executive and non-executive directors who sit on the Audit and Sustainability Committee on an annual basis.

Furthermore, ACCIONA Energía employs third-party on-site audits of the company's activities to ensure the ICSSS is being implemented effectively and is achieving positive outcomes. These audits include interviews with staff. In 2025, audits confirmed that the system was properly implemented. Once external monitoring procedures have been completed, reports are prepared to reflect the results. In the event of detecting real adverse effects, recommendations for improvement and specific action plans are designed to correct them.

4.1(f) ACCIONA Energía Ethical Channel

ACCIONA Energía maintains an Internal Reporting System that integrates its Ethical Channel. The Ethical Channel is available to any individual to report to the Ethical Channel Committee any potential irregularities, breaches or misconduct related to ACCIONA Energía's activities, including any action that may constitute modern slavery, that may be considered to be contrary to the Group's current legal framework, their Code of Conduct, and/or ethical values.

ACCIONA Energía informs employees and third parties with whom it engages about the existence and purpose of the Ethical Channel. In accordance with the provisions of the Ethical Channel Policy, communications can be made through any of the following means:

IN WRITING	ORALLY
• Through the Ethical Channel form available on the website and intranet: http://canaletico.acciona.com/; • By post	• By a voice message attached to the Ethical Channel form; • By meeting with a Committee representative in person by video conference or by telephone

Management of the Ethical Channel is based on the following core principles:

- Guarantee of confidentiality for all communications received;
- Respect for the anonymity of individuals who do not wish to be identified;
- Impartiality and objectivity in the evaluation of cases;
- Respect for the rights of all parties involved in the handling of cases; and
- Absence of retaliation against informants who report in good faith.

The Ethical Channel is managed by the Ethical Channel Committee, a body whose functions include, among others:

- Facilitating a communication channel for all members of the organisation and third parties, to gather and provide information on compliance with the Code of Conduct, and manage complaints and queries received to facilitate coordination of their resolution and follow-up;
- Manage the Ethical Channel based on the principles of:
    - Confidentiality: ensuring the confidentiality of the whistleblower's identity is a guiding principle in the management of the Ethical Channel. The persons entrusted and designated to receive and process complaints, as well as to implement the measures resulting from the processing of the complaints, have an obligation to keep the identity of the whistleblower and of the person affected by the complaint made strictly confidential;
    - Anonymity: the Ethical Channel can be used for making anonymous complaints. Therefore, it is strictly prohibited to undertake or fail to undertake any actions with the aim of revealing the whistleblower's identity when he/she has opted to remain anonymous;
    - Non-retaliation: whistleblowers who report wrongdoing in good faith may not be penalised or suffer any negative consequences or retaliation for lodging their complaints. This extends to persons associated with the whistleblower, to natural persons assisting the whistleblower during the lodging and processing of the complaint, as well as to the legal representatives of the employees in the exercise of their duties of advising and supporting the whistleblower; and
    - Impartiality, objectivity, and respect for the rights of all parties involved in the inquiries.
- Review all complaints received through the Ethical Channel and determine the methodology to be used in processing and investigating them; and
- Report regularly to the Board of Directors, through the Audit and Sustainability Committee, on any complaints reported and their resolution.

Although the online communication channel (web form) is shared across the entire ACCIONA Group, all communications are automatically segmented, guaranteeing independent and confidential management by the Ethical Channel Committee in relation to communications concerning ACCIONA Energía.

The Audit and Sustainability Committee oversees the activities carried out by the Ethical Channel Committee, receiving information on the communications submitted.

The Ethical Channel Policy was updated in 2025 in order to simplify the regulatory framework for reports of irregularities. The Ethical Channel Communication Management Procedure was integrated into the Ethical Channel Policy. The changes to the Policy material to modern slavery risks are summarised on page 15.

Ethical Channel Effectiveness

In 2025 the number of communications increased by 10% compared to 2024. A total of 43 communications were made through the Ethical Channel relating to ACCIONA Energía, of which, 19 were investigated: 11 by an external investigator and 8 by an internal investigator. Thirteen reports were determined as not requiring investigation because they were outside the scope of the Ethical Channel (such as unsubstantiated claims and commercial complaints). Three complaints were categorised under working conditions, relating to performance procedure and a professional category. Thirteen were categorised under interpersonal conflicts and misconduct. None of the complaints related to modern slavery issues.

As a result of the investigations carried out, the Ethical Channel Committee proposed the adoption of various measures aimed at reinforcing the culture of ethics and compliance, such as training plans, coaching plans, review of processes or dismissals.

Changes to the Policy material to modern slavery risks

TOPIC	2024	2025	PRACTICAL IMPACT
GOVERNANCE	• Ethical Channel managed by an Ethical Channel Committee. • Intervention by ACCIONA S.A. Director of Compliance was discretionary.	• Governance framework expanded. • Committee Chair expressly described as an independent office with adequate resources. • Regular reporting to the Audit and Sustainability Committee, including statistics and outcomes.	• Strengthens independence, resourcing and board-level oversight of whistleblowing. • This improves confidence that serious allegations (including forced labour or supplier misconduct) will be escalated, monitored and addressed at senior governance levels.
SCOPE	• Available to the general public and applies to staff and subsidiaries.	• Explicitly available to the general public and applies to entities where ACCIONA has majority control or management responsibility, irrespective of geography.	• Broadens reach beyond employees to external parties who may be exposed to modern slavery risks (e.g. contractors, affected communities).
REPORTING	• High level reporting channels and indicative timeframes. • Limited procedural detail.	• Introduces a stand alone, detailed Report Management Procedure, including admissibility tests, dismissal grounds, and step by step investigation stages.	• Improves procedural certainty and defensibility when handling complex or sensitive allegations, including modern slavery complaints that may involve third parties, historic conduct or parallel investigations.
PROTECTION	• General protections covering confidentiality, presumption of innocence and non retaliation.	• Detailed and differentiated rights and obligations for whistleblowers, reported persons and witnesses, including rights to legal representation and to be informed of outcomes where appropriate.	• Enhances trust and procedural fairness, increasing the likelihood that victims or observers of modern slavery will report concerns without fear of retaliation.
COOPERATION	• General cooperation expectations only.	• Express duties to preserve evidence, maintain confidentiality and cooperate with authorities if required.	• Particularly relevant to modern slavery matters, where early evidence preservation and regulatory cooperation are critical to effective remediation and compliance.
INVESTIGATIVE POWERS	• General reference to internal investigations.	• Explicit authority (subject to proportionality and data protection law) to access IT systems, review communications, engage external experts and coordinate with authorities.	• Significantly strengthens investigation capability for serious human rights or labour exploitation allegations, including those involving suppliers or cross border conduct.

ACCIONA Energía regularly assesses whether its staff members are aware of and trust these processes and structures. The 2025 Compliance Survey results showed that:

- 82% of participating employees in Australia confirm that they are aware of the existence of the Ethical Channel;
- 80% of these employees are aware of the Ethical Channel Policy;
- 76% of these employees state that they know how to access the Ethical Channel; and
- 79% of these employees indicate that the Ethical Channel inspires sufficient confidence for them to report irregular or non compliant conduct.

4.1(g) Compliance Training and Communication

ACCIONA Energía continued to implement its training and communication programme managed by the Compliance Department (**Compliance Training**). The aim of Compliance Training is to reinforce a culture of ethics and integrity in ACCIONA Energía.

Compliance Training includes a mandatory course for all ACCIONA Energía employees on the Code of Conduct and two mandatory courses for executives and managers called 'Fighting Corruption' and 'The Right Way to Work'. Globally, 92% of nominated personnel have completed this training as of 31 December 2025.

Compliance Training is complemented by segmented sessions, aimed at teams that are particularly exposed to risks and areas of special relevance related to international and national internal control. Throughout 2025, 19 targeted training sessions were carried out, attended by 279 employees. Trainings were tailored based on employee category, risk exposure and specific needs of a country.

In 2025, multiple communication campaigns were rolled out to the management team and all ACCIONA Energía employees via the intranet, e-mails, newsletters, face to face and on-line meetings, and the ACCIONA CAMPUS App. In addition to communications specific to ACCIONA Energía, employees also receive some global communications applicable to the entire ACCIONA Group.

The communications pertained to, amongst other things, the Code of Conduct, compliance tools and ethical culture. In addition, the communication initiative 'Break with Compliance', aimed at promoting a culture of corporate ethics, has continued to be implemented across ACCIONA Energía. During the 2025 financial year, 16 sessions were held and attended by 102 employees.

The annual compliance survey sent to all employees of ACCIONA Energía seeks to ascertain employees' understanding and familiarity with the internal regulations on ethics and compliance. A record number of participants completed the 2025 Survey, with 671 responses from 20 countries and more than 200 comments.

4.2 Management of Supply Chain Modern Slavery Risks

ACCIONA Energía carries out a wide variety of due diligence actions aimed at managing the various material matters relating to the workers in its supply chain, prior to entering into contracts. A major aspect of our supplier due diligence process is identifying and assessing modern slavery risks with our prospective and current suppliers, contractors and collaborators. Our due diligence process is structured in the following seven stages:

1. Risk and impact identification and assessment;
2. Detection mechanisms;
3. Mitigation of actual and potential adverse human rights impacts;
4. Monitoring and continuous improvement;
5. Accountability;
6. Remediation; and
7. Collaboration with the authorities.

Where risks are identified, we have measures in place to address those risks. We acknowledge that we cannot identify all instances of modern slavery in our supply chains. Therefore, we have policies and procedures in place that aim to minimise unidentified instances of modern slavery.

In 2025, our evolving supplier approval procedure resulted in:

- 101 suppliers audited, with 15 suppliers located in high-risk countries (China and India);
- Follow-up of audit findings, of which 90% required a Due Diligence or Improvement Plan, with a 100% completion rate; and
- Audits of an additional nine Tier 2 suppliers accounting for 80% of the total contracted with Tier 1 cable and transformer suppliers, for contracts worth more than $8,282,400.

4.2(a) Ethical Principles for Suppliers, Contractors, and Collaborators

ACCIONA Energía extends the scope of our commitment to ethics and Human Rights by disseminating a copy of the Ethical Principles Suppliers, Contractors and Collaborators document (**Ethical Suppliers Document**) to all suppliers, contractors and collaborators. They must respect Human Rights as defined in the internationally recognised standards (see item 2.2 above). Furthermore, suppliers, contractors and collaborators must ensure that, as far as it is possible, they are not complicit in any violation of these standards.

The Ethical Suppliers Document explicitly prohibits our suppliers, contractors, and collaborators from engaging in modern slavery. Suppliers:

- Are prohibited from using all forms of forced labour as defined in the ILO Conventions 29 and 105;
- Must not engage in child labour as defined in ILO Convention 138;
- Must employ ethical, legal and voluntary recruitment practices;
- Are bound by the requirements in ACCIONA Energia's Migrant Workers Standard;
- Must offer fair, legal and equitable remuneration and employment conditions to their workers in writing, in a language the workers understand;
- Must comply with laws, regulations and international standards for working time; and
- Are prohibited from any behaviour that is a manifestation of physical, psychological, moral or sexual harassment, or that amounts to an abuse of authority.

Our contracts with suppliers include obligations relating to the ethical principles for suppliers and to sustainable procurement. 100% of ACCIONA Energía's orders and contracts specifically incorporate clauses on Human Rights standards and ethical principles.

The Supply Agreement states that a supplier must 'obtain and comply' with the UN Global Compact. The Supply Agreement also states that a supplier must:

> *"Wherever reasonably possible, source all materials used in the Supply from ethically responsible suppliers and undertake the Supply in a way that supports internationally-recognised environmental sustainability practices.."*

Furthermore, a supplier must also:

> *"Meet all internationally recognised standards in the areas of corporate ethics and transparency, human and social rights, health and safety, and quality and environment, and to not act (both in relation to the Supply and generally) in any way which does not accord to the laws and customs of the jurisdictions in which the Supplier operates."*

The Supply Agreement provides ACCIONA Energía with a broad right to terminate a contract with a supplier if they breach the Supply Agreement by failing to comply with these principles, and do not remedy the breach within 10 days after receiving notice of the breach. Additionally, ACCIONA Energía may direct a supplier to suspend the carrying out of their obligations under the Supply Agreement for such time as ACCIONA Energía thinks fit.

While we do reserve the right to terminate any contractual relationship that fails to comply with the ethical principles, we prefer to provide an opportunity for suppliers that are in breach of these principles to make improvements. This is demonstrated through reinstating suppliers who provide evidence of suitable corrections.

Case Study

In 2025, we have continued to reinforce contractual commitments required of PV module suppliers, with a particular focus on the prohibition of forced labour in all phases of the supply chain. The contracts include explicit obligations to ensure compliance with ILO international standards, have adequate management systems and conduct due diligence on their own suppliers.

In Australia, a new clause has been added to the terms and conditions of the standard contract in which a supplier acknowledges that it has obligations to comply with modern slavery laws, and represent and warrant that they are taking reasonable steps to identify and prevent modern slavery risks from eventuating within their organisation and supply chain, including from subcontractors.

The clause also requires a supplier to provide any information or documents in relation to any modern slavery risks within the supply chain, including the completion of a self-assessment questionnaire when required. If a modern slavery offence or a related charge arise, the supplier must notify ACCIONA Energía.

4.2(b) Supplier Registration and Qualification Process

The global guide for Supply Chain Management (**Supplier Management Guide**) and the ancillary "Corporate Procedure for the Qualification and Evaluation of Suppliers" (together, the **Procedures for Supplier Qualification**) describe the processes to be followed in supplier management as well as defining criteria for the registration and qualification of suppliers, contractors and collaborators who want to engage with ACCIONA Energía. Our Supply Chain processes are publicly available at https://contractorprofile.acciona-energia.com. This portal was rolled out to global contracting in 2023. It also provides a log in for registered suppliers to manage their information.

A supplier must be registered on our SAP management system before they can supply to ACCIONA Energía. This is a database of ACCIONA Group suppliers and potential suppliers. In the case of suppliers that require a purchase order, ACCIONA Group's bidding and procurement negotiation management tool (**PROCUR-e**) is the only entry point to SAP. A supplier's qualification status is calculated and recorded in PROCUR-e.

Once the potential supplier has been entered in PROCUR-e, the supplier will automatically be invited to GoSupply, an international supplier registration and classification database. Once invited, the supplier must accept the invitation and register in GoSupply. Globally, over 16,000 suppliers to ACCIONA Energía are now registered in GoSupply for assessment and monitoring (consisting of 1505 suppliers to the Reporting Entities). Over 70,000 suppliers are now registered in PROCUR-e for assessment and monitoring (consisting of 1308 suppliers to the Reporting Entities). 92 invitations were sent to potential suppliers of the Reporting Entities in 2025, resulting in 19 new strategic suppliers.

In order for a new supplier to be approved, the supplier agrees to comply with the 6 basic Human Rights standards. The standards take into account the following rights:

1. Freedom of association and collective bargaining;
2. Prevention of discrimination (based on sexual orientation, age, gender, marital status, level of education, political, ideological or religious convictions, origin or social status, physical or intellectual ability);
3. Prevention of unacceptable disciplinary practices based on corporal punishment, physical or mental coercion, verbal abuse, harassment, workplace abuse of all kinds or unfair wage deductions;
4. Guarantee that the hiring procedure is fair and provides a living wage to all workers;
5. The supplier contemplates and takes into consideration national regulations and is within the standards of the sector in terms of working hours; and
6. Guarantee of non-participation or benefit from any type of child labour.

GoSupply segments suppliers based on the level of spend, as per the table below. The annual spend may be for a single contract or accumulated over the 12 months.

ANNUAL SPEND (AUD)	MINIMUM GOSUPPLY REGISTRATION	RESPONSIBLE SUPPLIER SELF-DECLARATION	COMPLY WITH NO GO POLICIES	QUALIFICATION
<$24,847	Basic	✓	✓	
$24,847-$662,592	Advanced	✓	✓	
>$662,592	360º Plus (Strategic supplier)	✓	✓	✓

In 2025, ACCIONA Energía worked with a total of 3,335 suppliers, with a purchase volume of $2,596 million

GOSUPPLY STATUS	NUMBER OF SUPPLIERS	PURCHASE VOLUME
Basic	298 (8.94%)	0.1%
Advanced	2269 (68.03%)	6.7%
360º Plus	768 (23.03%)	93.2%

All suppliers, regardless of spend level, must self-declare their acceptance of the ACCIONA Group Ethical Standards and international standards on Human Rights as mentioned above (**Responsible Supplier Declaration**). Compliance with provisions of the No Go policies (see section 4.2(e)) and the status of the supplier's legal documentation (for example, whether the company has filed all documentation for its workers as required by local laws) are checked in the supplier registration process.

Prospective suppliers are also required to complete a questionnaire through GoSupply as part of registering as an ACCIONA Energía supplier (**On-boarding Questionnaire**). The On-boarding Questionnaire asks the prospective supplier to identify what supply chain control and due diligence mechanisms it has in place. All prospective suppliers must answer questions regarding compliance with international standards on labour rights, including a guarantee that the supplier does not participate in or benefit from any child labour. The On-boarding Questionnaire is more extensive for suppliers at the Advanced and 360º Plus level. Suppliers tendering for single contracts greater than $662,592 or which accumulate multiple contracts exceeding this value in a 12-month period are required to meet the most stringent qualification requirements. This ensures they are acting in accordance with our standards of transparency and business ethics, human and social rights, health and safety, quality and the environment. Once qualified, these companies are considered strategic suppliers and have a valid 'qualified' registration status for a period of 3 years, at which time renewal through the qualification process is required. The qualification criteria include minimum risk scores and additional due diligence of suppliers in high-risk countries, including audits (see item 4.2(c) Risk Map). Nineteen new strategic suppliers were added in 2025 for the Reporting Entities.

Should a supplier fail to meet any of the qualification criteria, the supplier will be given time to resolve the issue before being re-evaluated based on evidence provided to ACCIONA Energía. ACCIONA Energía may decide to award provisional qualification for a short time period (for example 3 months) if the non-conformity is only minor (**MNC**). A MNC is a partial breach of a requirement that does not pose a significant risk or is not a legal requirement. However, the non-conformity will need to be rectified before the qualification is extended.

ACCIONA Energía continuously monitors the performance of suppliers with respect to health and safety, quality, and environment, with ratings from 0 (lowest) to 4 (highest). At the end of a contract, the departments requesting the service or supply carry out an assessment of the performance of ACCIONA Energía's supply chain to obtain relevant data for future contracts. During 2025, 948 supplier performance assessments were carried out with 97% of the assessments returning results of Type A (very recommendable supplier) or Type B (recommendable supplier).

A new assessment method has been designed based on a new tool identified in 2024 to streamline this evaluation process. Implementation of the new method will occur with the roll out of a new procurement ecosystem in 2026.

The Corporate University Supplier Campus is integrated into PROCUR-e and available free of charge to 100% of our supply chain. Throughout 2025, 24 suppliers completed 63 training courses out of those offered in the platform, with 12.7% of courses completed being related to Human Rights. In addition, the third annual Compliance Day was held with 23 suppliers from the Dominican Republic, to communicate ACCIONA Energía's internal standards and strengthen the suppliers' legal and ethical compliance practices.

4.2(c) Supply Chain Risk Map

ACCIONA Energía utilises the GoSupply international supplier registration and classification database to calculate a "risk score" for our prospective and current suppliers. The main objective of the Supply Chain Risk Map (**Risk Map**) is to detect risks within our supply chains, mitigate against those risks, control the relationship with suppliers, and identify points of improvement in order to offer suppliers training and information if required. In 2025, the system has been implemented globally, and we will continue to add countries in which ACCIONA Energía commences new activities.

The Risk Map utilises the Maplecroft data in the TPRGA Risk Country Table and the supplier's answers to the GoSupply on-boarding questionnaire to produce risk scores in the following categories:

GOSUPPLY REGISTRATION	RISK MAP ASSESSMENTS						AUDIT
	ESG	Geopolitical	Compliance	Operational	Financial	Cyber	
Basic	✓	✓					
Advanced	✓	✓	✓	✓	✓		
360º Plus (Strategic)	>40%	✓	>60%	>60%	✓	✓	✓*

* Audit criteria apply, see section 4.2(g) Supplier Audits

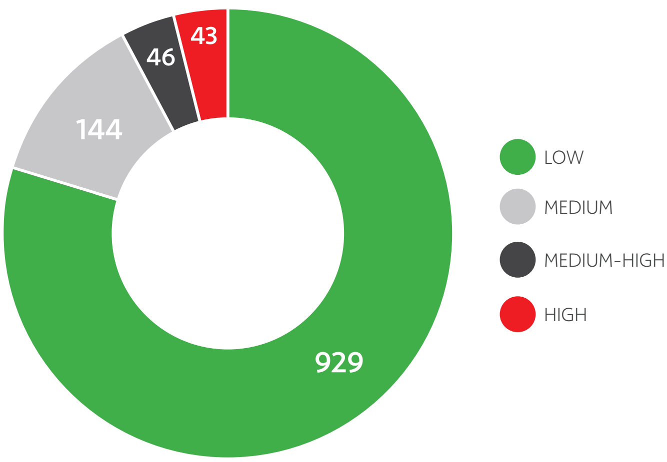
Geopolitical risk is assessed from various indices extracted from Maplecroft and GoSupply such as corruption, Human Rights, labour conditions and environmental legislation. Countries are scored from 1 (very low risk) to 5 (very high risk). Any prospective suppliers based in high-risk countries must undergo an audit prior to qualification.

Minimum acceptable scores for strategic suppliers are 40% for ESG risk, 60% for compliance risk and 60% for financial risk. In addition to meeting these minimum criteria, a supplier will have to comply with an 'improvement plan' and/or a Supplier Audit (see section 4.2(g)) if they score "high risk" in any of the risk score categories.

The Supplier ESG audit protocol includes investigation of that supplier's performance related to human and fundamental rights, as well as their business processes for due diligence in their supply chain. In this way, we identify and manage risk deeper into our supply chain beyond our Tier 1 suppliers.

GoSupply Australian supplier risk level

(includes all current and potential Australian suppliers registered in GoSupply, plus overseas suppliers to the reporting entities in 2025)



4.2(d) Enhanced Due Diligence

When potential human rights breaches are detected in the supply chain, we conduct enhanced due diligence (**EDD**) to assess the situation and the implications of such findings.

The EDD process allows the magnitude of the violations, their root causes and the parties involved to be identified, facilitating the implementation of appropriate corrective measures. Following an EDD investigation into any adverse impacts detected, we communicate with the supplier to confirm the information and verify the resolution of the situation prior to entering into any new contract. This process reinforces the company's commitment to ethics and social responsibility, ensuring that the fundamental rights of workers and affected communities are protected.

Case Studies

In the second quarter of 2025, an alert was received through GoSupply from a potential supplier for Latin America, reporting its potential involvement in the "Construction Club", where participating companies were allegedly dividing up contracts awarded by the country's Ministry of Transport and Communications. The country's Anti-Corruption Prosecutor's Office has been investigating this matter since 2017. EDD actions included a request for information from the supplier's legal and compliance department, follow up on certifications and implemented corrective actions, and a complete review by our Compliance Department. All the issues raised have been resolved.

In the last quarter of 2025, an alert was received relating to managers at a Spanish supplier being investigated for corruption. ACCIONA Energía's Compliance department analysed the situation, recommending active monitoring of the supplier and media reports in order to proceed with renewal of the contract.

The Procurement department is responsible for implementing and monitoring actions aimed at mitigating these risks. If necessary, the Compliance department will provide further analysis based on information obtained and the outcome of actions.

4.2(e) No Go Policy

ACCIONA Group sets mandatory minimum standards for suppliers if they wish to be contracted by any entities of the ACCIONA Group. 100% of ACCIONA Energía suppliers (including strategic and other status levels) can review their ESG classification and related information on the GoSupply platform. Suppliers that fail to comply with these policies are labelled "No Go suppliers". No Go suppliers will not have access to PROCUR-e and therefore will not be able to tender for projects.

A previously qualified supplier may also enter "No Go" status if they breach a No Go policy. In such a case, the supplier will automatically lose their qualification as an ACCIONA Energía supplier. A list of "No Go" suppliers is distributed to all ACCIONA Energía-related companies at least once a month.

Suppliers will be subject to the No Go Policies in 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;
- Strategic suppliers in at-risk countries that have not been audited, or that have been audited and have one or more unresolved Serious Non-Conformity;
- Suppliers who have demonstrated non-compliance with the United Nations Global Compact; and/or
- Suppliers penalised due to the evaluation of their performance on previous activities or due to unresolved serious deficiencies detected during auditing.

Given that a company facing financial distress may be more likely to engage in unacceptable practices, including modern slavery practices, suppliers in the following circumstances are also to be subject to the No Go Policies:

- Suppliers at risk of economic insolvency (for suppliers with total supply contracts of $1,656,480 or more); and/or
- Suppliers with debts to social security or taxation authorities.

A supplier may have its "No Go" status removed if they pass a Supplier Audit (see section 4.2(g)), by complying with an Improvement Plan, or by Enhanced Due Diligence (see section 4.2(d)).

No Go Policy Effectiveness

At the beginning of 2025, there were 44 suppliers listed as "No Go" globally. During the year, 17 No Go suppliers exited No Go status and a further 14 suppliers entered No Go status, so that at the end of 2025 there were 41 suppliers listed as No Go. Two suppliers to the Reporting Entities were moved into the No Go list in 2025 due to non-conformities not being addressed in a timely manner. The same two suppliers were also moved out of the No Go list in 2025 following resolution of the issues identified.

In accordance with its 2025 Sustainability Master Plan, ACCIONA Energía met its target of 0% of general purchase orders being placed with companies that breach ACCIONA Energía's No Go policies.

4.2(f) Dow Jones Risk Center Tool

The Dow Jones Risk Center tool (**DJRC**) is used to conduct due diligence of business partners or collaborators that fall outside of the GoSupply registration process for supplier management. This includes joint venture partners, consortiums and sponsorships. For once-off donations or sponsorships, the tool is used to check that there are no past incidents that may indicate unethical behaviour by the recipient. For ongoing contractual relationships, business partners are registered in the tool and an assessment is conducted of public information as well as information provided by the business partner. Areas of risk are identified and appropriate mitigation steps must be implemented. The tool constantly monitors registered parties and provides alerts if a breach occurs.

4.2(g) Supplier Audits

By signing and accepting the Responsible Suppliers Declaration, suppliers agree to collaborate with audits (**Supplier Audits**). Supplier Audits are carried out with the assistance of independent ESG compliance service provider GoSupply (which has merged with Achilles which was one of our previous service providers). Our audits are based on the ACCIONA Energía Supply Chain Audit Protocol. Supplier audits are carried out on:

- Tier 1 strategic suppliers (annual procurement over $662,592) from high risk countries;
- Tier 1 strategic suppliers where the annual spend is over $828,240 from any country; and
- Tier 2 suppliers covering at least 80% of the contracted supply amount of Tier 1 supply contracts over $8,282,400.

Among other areas of focus, a supplier ESG audit will examine a supplier's:

- Community relations;
- Work environment;
- Compliance with human and fundamental rights;
- Occupational health and safety performance;
- Supply chain due diligence, including specific questions on traceability of materials that pose a higher risk;
- Business ethics and integrity; and
- Reputation.

In addition, a supplier ESG audit includes interviews with on-site workers to verify documentation and information directly with the supplier. On-site audits are essential to prevent and detect human rights violations, such as forced labour or child exploitation, particularly in high-risk countries.

If a serious non-conformity (defined as a legal breach or breach of an essential requirement for ACCIONA) (**SNC**) is detected during an audit, an improvement plan will be proposed to address the issue and the supplier must resolve the SNC within 3 months. A further 3-month extension to resolve the SNC may be provided for suppliers that demonstrate a willingness to comply with the Supplier Audit. During that period, the supplier will remain in a provisional approved status in PROCUR-e. However, if a supplier has more than 10 SNCs or fails to comply with the principles of the Global Compact, its status will be deemed "No Go". Further, a supplier's status will be deemed "No Go" if they have failed to resolve the SNC within the specified time, or failed to comply with an Improvement Plan within the specified time. SNCs are resolved by presenting evidence to the auditor for review and approval.

By signing the Responsible Suppliers Declaration, suppliers acknowledge that if they provide incorrect information during a Supplier Audit (or at any other stage) ACCIONA Energía reserves the right to automatically cancel any supplier contract.

Supplier Audit Effectiveness

In 2025, 101 supplier audits were conducted, with 92 audits carried out on direct suppliers globally. Audit results are valid for three years, and at the end of 2025 75.57% of strategic suppliers had a valid audit. Globally, 71.74% of the direct suppliers who were audited in 2025 had zero SNCs. The remaining 28.26% signed up for various action plans, of which 65.38% had fully resolved their SNCs at the end of 2025.

Eleven Australian suppliers were audited in 2025, covering a range of industries. Of the 11 audited Australian suppliers, 10 were Tier 1 suppliers and one was a Tier 2 supplier. No SNCs were identified in any of the 11 Australian audits. All audits of Australian suppliers were conducted because each supplier reached the annual spend threshold as outlined in the supplier audit protocols.

The Australian supplier audits identified one MNC directly relevant to modern slavery. This MNC was resolved by the relevant supplier creating and implementing a modern slavery policy and procedures in line with laws, in accordance with the action plan set by the auditor.

Other relevant MNCs were either resolved or in the process of being resolved by the respective Australian suppliers binding their subcontractors to policies:

1. Prohibiting underage labour,
2. Setting fair remuneration standards; and
3. Setting human rights standards and procedures.

As a result of these audit findings, we have been able to encourage improvement in the relevant suppliers' processes, proactively ensuring that their risk of modern slavery is reduced.

Expansion of Audits in 2025

In 2025, ACCIONA Energía expanded its Social Safeguards System external audits (see section 4.1(e)) to include a specific review of respect for Human Rights and working conditions in the value chain. Two evaluations were carried out: an operational asset in Spain and a construction project in the Dominican Republic. The review covered labour practices of ACCIONA Energía's own personnel, as well as those of the main contractor companies.

The audits evaluated formal labour contracts, access to information and training, existence of complaint mechanisms and compliance with labour regulations, and involved both a document review process and interviews with a representative sample of our own workers, contractors and subcontractors.

The audits showed adequate overall compliance with working conditions, respect for Human Rights and available welfare and complaint mechanisms, with no findings of serious adverse impacts or material breaches of Human Rights. The areas identified for improvement included the standardisation of documents and reinforcement of training and communication for workers employed by contractors. These recommendations have been incorporated into the action plans of these sites as well as the global value chain management procedures.

Tier 2 Suppliers

Since 2018, ACCIONA Energía has also carried out audits of Tier 2 suppliers according to the threshold criteria to safeguard its supply chain and mitigate risks of modern slavery. In 2025, the Tier 2 audit campaign focussed on two strategic Tier 1 suppliers of cables and transformers. Nine audits of their suppliers (our Tier 2) were conducted, covering at least 80% of their supply as per the audit criteria. Of those nine Tier 2 supplier audits, eight were located in China and one was located in Switzerland.

High Risk Countries

Fifteen Tier 1 and 2 suppliers triggered the audit criteria for suppliers in high-risk countries in 2025. These suppliers were based in China and India. SNCs were identified at two of these suppliers, both of which were from Tier 2. These SNCs related to HSEQ aspects (Health & Safety, Environment and Quality), not Modern Slavery issues, and have since been satisfactorily addressed.

Improvement Plans

Where a SNC has been identified in an audit, the auditor will provide recommendations for improvement to meet legislative requirements and address the non-conformity. In addition, the GoSupply Improvement Plans Module provides suggestions for improvement to all companies registered, to enable them to make proactive changes to their processes. In 2025, 1,205 improvement plans relating to labour rights were sent to registered suppliers to improve their ESG rating.

Supplier Insights - Example

ESG/SUSTAINABILITY | IMPROVEMENTS:4 | POSITIVE INSIGHTS:2

IMPROVEMENTS

- It is recommended to join the UN initiative that leads business sustainability worldwide at https://www.pactomundial.org/
- The new Directive on due diligence of companies in sustainability matters requires large companies to have a management system that ensures due diligence of their value chain. It is recommended that all companies, regardless of their size, begin to implement systems that guarantee their value chain.
- It is recommended to have a plan for the consumption of electricity from renewable sources.
- ISO 37301 Certified Compliance Management System or equivalent is recommended.

POSITIVE INSIGHTS

- Congratulations, your CSR policies make your company stand out.
- Having its own Code of Ethics or Code of Conduct has helped it to position itself as one of the most highly valued suppliers.

5. Assessing our Goals from 2025

We outlined several goals in our joint statement for 2024 that we were looking to achieve in 2025.
The below table outlines how we were able to achieve these goals in 2025.

GOALS FOR 2025	HOW THIS WAS ACHIEVED
Continuing to encourage suppliers to manage and disclose up to date information regarding their supply chains via their portal log-in on the Contractor Profile (see section 4.2(b)) and to make ACCIONA Energía's procurement criteria (including human rights standards) known.	Achieved. We continue to engage with suppliers via the Contractor Profile to ensure all are aware of ACCIONA Energía's procurement criteria and standards.
Maintaining audits of Tier 2 suppliers for Tier 1 equipment supply contracts worth more than $8,282,400, covering at least 80% of the supply.	Achieved. The Tier 2 audit campaign was extended to cable and transformer suppliers, with nine Tier 2 suppliers audited.
Review of sustainable procurement criteria and, if possible, system automation to facilitate control; and automation of supplier performance appraisal.	The new assessment method has been designed, but it has not yet been possible to implement it due to delays in the roll-out of the new procurement ecosystem.

Additional objectives from our completed SMP2025 which relate to Human Rights and modern slavery risks and the final outcomes are:

SMP2025 OBJECTIVE	OUTCOMES
Access to Rights Implement social safeguards system in 100% of the company's new projects. Implement a sustainable qualification system for significant suppliers worldwide.	Achieved. The Social Safeguards System has 100% coverage across the business. The Supplier approval process has evolved so that 100% of suppliers are evaluated using the company's Risk Map, Human Rights criteria are included in contracts and the ESG audit protocol provides assurance of compliance.
Supplier audits Audit 80 suppliers in 2025, including reaching 95% in at-risk countries.	Achieved. 101 suppliers were audited in 2025, including 100% of suppliers in at-risk countries. Audits are valid for three years. At the end of 2025, 75.57% of Strategic Suppliers had a valid ESG audit in place.
Follow-up of findings in supplier ESG audits, of which 90% must have a Due Diligence or Improvement Plan.	Achieved. 100% of supplier ESG audit findings have Due Diligence or Improvement Plans.
Governance Thorough application of ACCIONA Energía's No Go policies, revised and expanded in previous years.	Achieved. ACCIONA Energía continues with strict adherence to not placing orders with "No Go" suppliers.

6. Looking Ahead

In 2026 we will develop the detailed objectives of our Integrated Strategy Master Plan 2030 by business and country, and begin to scope the activities to enable us to meet these objectives, including any new initiatives related to modern slavery and human rights.

While these are being developed, we are continuing to build on our goals from last year as outlined in section 5 above. Globally, the modern slavery objectives we intend to focus our efforts towards for 2026 include:

1. Continue to assess and control risks to human rights in our operations through the Internal Control System for Social Safeguards.
2. Continue efforts to ensure that current and prospective suppliers are aware of ACCIONA Energía's procurement criteria and standards specific to Human Rights and modern slavery, and promote transparency and opportunities for new suppliers to work with us by publishing tenders exceeding $662,592 globally though the Contractor Profile website.
3. Continue to maintain supplier ESG audits of Tier 1 and 2 suppliers which meet the audit criteria. This will include suppliers meeting the audit threshold for the first time, and others requiring requalification after three years.
4. Implement the new supplier performance assessment tool and method (see section 4.2(b)) to streamline monitoring of onboarded suppliers against ESG standards.
5. Continue the Compliance Day initiative that has been held with Mexican and Dominican suppliers, continuing to expand the reach of this program.

7. Modern Slavery Reporting Checklist

Modern Slavery Act 2018 (Cth): **(Act)**

REQUIREMENT	REFERENCE	MSS REFERENCE
TIMELINE Must be provided to the minister within 6 months after the end of the reporting period for the entity	S 13(2)(e), 14(f)(i) Act	Required submission date is 30 June 2026
REPORTING ENTITIES Identify the reporting entity/entities	S 16(1)(a) Act	Section 1 (About this Statement)
CONSULTATION Describe the process of consultation with: • any entities that the reporting entity owns or controls; and • in the case of a reporting entity covered by a statement under section 14 (joint statement)—the entity giving the statement.	S 16(1)(f)(i) Act S 16(1)(f)(ii) Act	Section 1.2 (Consultation)
STRUCTURE OF OPERATIONS AND SUPPLY CHAINS Describe the structure, operations and supply chains of the reporting entity.	S 16(1)(b) Act	Section 3.1 (Structure), Section 3.2 (Operations), Section 3.3 (Supply Chain)
RISKS OF MODERN SLAVERY Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	S 16(1)(c) Act	Section 3.4 (Modern Slavery Supply Chain Risks)
ACTIONS TAKEN TO ASSESS AND ADDRESS Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including: • due diligence; and • remediation processes.	S 16(1)(d) Act	Section 4.1 (Our Commitment to Modern Slavery Risk Management)
ASSESS EFFECTIVENESS OF ACTIONS Describe how the reporting entity assesses the effectiveness of such actions	S 16(1)(e) Act	Section 4.1 (Our Commitment to Modern Slavery Risk Management), Section 4.2 (Management of Supply Chain Modern Slavery Risks)
JOINT STATEMENT APPROVAL Must be approved by principal governing body of: • each reporting entity covered by the statement (including details of approval and signature of a responsible member for each reporting entity); or Signatures may be electronic (s 10 Electronic Transmissions Act 1999)	S 14(2)(d)-(e) Act S 16(2)(b)(i), (ii) Act	Section 1.2 (Consultation)

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