GENERAL COMMUNICATION POLICY OF CORPORACIÓN ACCIONA ENERGÍAS RENOVABLES, S.A. ("Acciona Energía")

14th July 2021



Contents

GENERAL COMMUNICATION POLICY OF CORPORACIÓN ACCIONA ENERGÍAS RENOVABLES, S.A. $\dots \dots 1$		
Contents		. 2
1.	GENERAL PRINCIPLES OF THE GENERAL COMMUNICATION POLICY	. 3
2.	GENERAL CHANNELS FOR INFORMATION, COMMUNICATION AND PARTICIPATION	. 3
2.	National Securities Market Commission and other bodies.	.4
2.	2 The Media	.4
2.	3 Corporate web page of Acciona Energía	.4
2.4	Webcasts and conference-calls.	. 5
2.	5 Social media	. 5
2.	5 Distribution lists	.6
3.	INVESTOR AND SHAREHOLDER RELATIONS DEPARTMENT	.7
Со	nferences and meetings	.7
4.	GENERAL MEETING OF SHAREHOLDERS	. 8



1. GENERAL PRINCIPLES OF THE GENERAL COMMUNICATION POLICY

It falls within the responsibility of the Board of Directors the highest level management and supervision of the general communication policy of Acciona Energía, that sets out the information and communication procedures of financial, non-financial and corporate information through the channels detailed below, so as to contribute to maximise the dissemination and quality of the information available to the market, shareholders and institutional investors, as well as proxy advisors, the markets, the media and public opinion in general, including the content of the information to be provided on the web page.

In order to achieve deeper communication with its national and overseas shareholders and investors, and to encourage transparency in the information it publishes on the group, Acciona Energía has established this policy that is governed by the following general principles:

- Transparency, truth, immediacy and homogeneity in the dissemination of information, so shareholders and the different interest groups receive all the legally required financial and non-financial information, as well as any other that may be considered of use, in a clear, accessible manner.
- To provide knowledge of matters that may be necessary to allow adequate exercise of their rights as shareholders, providing them clear, direct channels and lines of communication, that allow any doubt regarding the information provided to be resolved.
- To publish information in a periodic, appropriate, permanent manner, allowing shareholders and investors to know the most relevant aspects of the group at any time through the most effective channels to receive such information.
- Equal treatment for all the shareholders and investors who are in the same position, with regard to information, participation and exercising their rights as shareholders and investors.
 Always bearing said principles of equal treatment and non-discrimination among all shareholders in mind, Acciona Energía may adapt the information channels, communication and contacts according to the diverse recipients and the needs detected from time to time for these purposes.
- To use a variety of communication tools and channels, to contribute to maximise dissemination and the quality of the information available on the market, to investors and other interest groups, taking advantage of new technologies, that allow shareholders and other interest groups access to Acciona Energía in the manner that is easiest and most convenient to them, maintaining the Company at the forefront of the use of new communication channels.
- Compliance with the terms foreseen in the law, in the Good Governance Code of Listed Companies and in the Corporate Governance System and the principles of cooperation and transparency with the authorities, regulatory bodies and competent administrations.

The principles stated are applicable to the Company's information and communications with shareholders, Institutional Investors, within the framework of their involvement with the Company, and other interest groups, such as intermediary financial entities, managers and custodians of Company shares, financial analysts, regulatory and supervisory bodies, rating agencies, information agencies, proxy advisors, etc.

2. GENERAL CHANNELS FOR INFORMATION, COMMUNICATION AND PARTICIPATION



In order to guarantee fulfilment of the aforementioned principles and correct dissemination of information on the group for the shareholders and market in general, Acciona Energía has made available the following channels for information, communication, contact and participation:

2.1 National Securities Market Commission and other bodies.

The first general information channel that the Company makes available to shareholders, Institutional Investors and markets in general, is the National Securities Market Commission ("CNMV"), as well as, if appropriate, the channels established by other foreign supervisory authorities and bodies, with the public diffusion and status that immediately acquire the information sent to these institutions through the Communication of Privileged Information or Relevant Information on their web pages, that are simultaneously added to the Company's corporate web page.

2.2 The Media

For the purposes of facilitating open, transparent communication with the media, Acciona Energía has a Communication Management unit through which it channels petitions or queries by journalists on the evolution and business by the company, as well as the relevant replies.

Acciona Energía provides the press with several telephone lines (91 663 01 26) as well as an e-mail address (prensa.energia@acciona.com). The different press releases and various materials published by the company to facilitate work by the media may be found on its corporate web page www.acciona-energia.com.

2.3 Corporate web page of Acciona Energía.

Another main channel of communication by the Company with the shareholders, Institutional Investors and markets in general is its corporate web page (<u>www.acciona-energia.com</u>), that is permanently updated, through which the Company channels information that may be of interest to the shareholders and Institutional Investors, favouring the immediacy of its obligation and the possibility of subsequent access, in order for transparency to be the main value that configures the relations the Company has with the markets and with the general public.

The Company not only publishes information it sends to the CNMV or other official bodies, the dissemination of which is legally mandatory, on its corporate web page, but also additional information that it considers convenient in order to achieve the greatest possible transparency and diffusion among its shareholders, institutional investors and the market in general.

In order to facilitate queries by shareholders and investors, the information the Company transmits through its corporate web page is simultaneously included -whenever possible- in Spanish and English. In general terms, the corporate web page of Acciona Energía allows to easily:

- Access the legal, corporate and economic-financial documentation, and non-financial information on the Company, through the "shareholders and investors" section.
- Within the framework of the General Meeting of Shareholders, to request information, clarifications or ask questions regarding matters on the agenda of the General Meeting of Shareholders, to view the proceedings of



the General Meeting of Shareholders live and even, when so foreseen by the Board of Directors, telematic attendance of the General Meeting of Shareholders.

- To know the principles, activities and reports, as well as other publications and data on non-financial information in general.
- To facilitate activity by the media thanks to the "News" section (https://www.acciona-energia.com/es/actualidad/), that is specifically designed for this group, that includes, among others, corporate information, press releases, audiovisual material etc., all with the final aim of the information the media provide the market being true and as complete as possible.
- To consult the composition and information on the governing bodies of the Company, as well as the Board of Directors and Committees of the Board, and the composition of the management team at Acciona Energía. Access to presentations of results and other presentations for analysts and investors.

2.4 Webcasts and conference-calls.

Periodic presentations of results and other relevant communications are broadcast on streaming and by conferencecall, which allows the shareholders, investors, analysts and anybody else who wishes to access them. Both the webcasts as well as the conference-calls are also available by deferred transmission through the corporate web page.

Moreover, at the beginning of each financial year, the schedule for approval of the annual accounts and interim financial reports is published, stating the dates on which their presentation to the market will take place, all this being accessible through the web page. The schedule also records the dates of the events and conferences on non-financial information.

The persons who connect by conference-call are also able to submit their questions to the speakers or group representatives.

The link for access to the webcast to present results is also published, prior to the event, on the CNMV web page, stating the date, time and means of access to the presentation.

2.5 Social media

Being aware of the repercussion of new information technologies and communication channels over the Internet, the Company shall encourage an active presence on the social media (such as Twitter, Instagram, Facebook, LinkedIn, SlideShare, YouTube) on which, without prejudice or detriment to its legal obligations, it aims to distribute information of interest on the running and activities by the Group and establish a flowing, advantageous dialogue for the shareholders and other interest groups that use these media in a recurring manner to obtain information on matters of interest.

When publishing privileged information on the social media, the Company shall ensure that any disclosure is governed by the following basic parameters:

- <u>Integrity</u>: the Company shall ensure that the character limit imposed by some social media does not affect the integrity of the communication, providing brief, immediately understandable communications.



- <u>Clarity</u>: the message published on social media must be objective and precise, avoiding use of superlative terms that might give rise to unnecessary subjectivity. Also, a clear indication of "Privileged Information" must be clearly provided, separated from any marketing communication.
- <u>Global access</u>: non-discriminatory access must be guaranteed for a wide public from the European Union and be distributed free of charge. In that sense, it is worth noting that the social media used must have ample presence in the European Union.
- Interactivity: the actual nature of social media provides a degree of interactivity with the users that other media do not provide. In that sense, the Company must ensure that use of any other means or channel for simultaneous, additional or complementary diffusion to the communication foreseen in point 2.1, used to communicate privileged information or other regulated information, may not include increases or clarifications of the original information sent to the CNMV, that alter its sense or scope, as part of the replies from the party communicating or issuing in the media or information channel.

The Company shall also ensure that the proceedings of the General Meetings of Shareholders are subject to total or partial disclosure through the social media, to which ends it may publish the main headlines on the event on the network in real time, upload photos and/or videos of the live event to the Company channels and share the presentations on a web page on the Internet.

Notwithstanding the foregoing, the employees of Acciona Energía must be especially careful in any public intervention, and must have the relevant authorisations to intervene before the media and in social networks, to publish and share opinions, to participate in professional conferences or seminars, and in any other situation that may have public diffusion, as long as they participate in their capacity as company employees. Likewise, the employees of Acciona Energía must ensure adequate coordination with their hierarchical superior and, if appropriate, with the Investor Communication and Relations department to provide complete, full information; as well as to make declarations responsibly, respectfully and precisely, following the directives established by Investor Communication and Relations and respecting the confidentiality of the Company's information and that of its clients.

2.5 Distribution lists.

The Investor Relations Department distributes periodic results and communications of privileged information or relevant information considered of special interest for the market to the persons who request such by electronic mail, immediately after these are published by the CNMV.

In order to ensure that diffusion of news liable to contain privileged information for the market is carried out under transparent conditions, symmetry and according to the terms set forth in Royal Legislative Decree 4/2015, of 23rd October, that approves the consolidated text of the Stock Market Act, Regulation (EU) no. 596/2014 of the European Parliament on market abuse, the directives of the CNMV in that regard and the Internal Regulations on Conduct on Stock Markets, the Company shall establish a privileged and relevant information management protocol that records the directives and criteria applicable to the Group for classification, management and publication of Privileged Information and Other Relevant Information.

In that sense, the Group has established the general rule that the information contained in a communication of privileged information or relevant information may not be disclosed by any other means if it has not previously been communicated to the CNMV.



The shareholders, Institutional Investors and markets may be notified of information generated by the Company by any means that complies with this General Communication Policy, without this being subject to the foregoing, as long as there is no doubt as to it not being necessary to communicate such information to the CNMV as privileged or relevant information pursuant to the law and the Protocol on disclosure of privileged and relevant information; and when, having consulted the Secretary General of the Company or the IRC Compliance Unit, this has determined, according to the rules established in the preceding paragraph, that it is not a requisite to notify the CNMV.

3. INVESTOR AND SHAREHOLDER RELATIONS DEPARTMENT

In order to facilitate open, transparent communication to the shareholders, a Shareholders' Office is kept permanently open, through which requests for information, clarifications or questions and the relevant replies are channelled.

To that end, in order to provide customised attention to their queries, Acciona Energía provides the shareholders contact telephones (+34 91 919 02 87 and +34 91 297 40 64) and an electronic mail (<u>Investors.energia@acciona.com</u>) which is also available through the company web page, www.acciona-energia.com where the contact persons from this department may also be found.

Conferences and meetings.

Acciona Energía has a specific Shareholders' and Investors Relations Department, that is configured as a global function in charge of coordinating, analysing and managing relations and contacts with shareholders and investors; and it is thus the natural channel for permanent communication and contact between Acciona Energía, its shareholders and investors and the market in general.

Performing this function, the Group Shareholders' and Investors Relations Department shall coordinate communication by the different subsidiaries with the market to ensure this is adequate, consistent and coherent at all times.

When it is considered necessary, the Shareholders' and Investors Relations Department shall have collaboration by people in the organisation that may be necessary or convenient to facilitate communication and attend to the requirements of information raised at each moment.

In performing its functions, the Shareholders' and Investors Relations Department shall obtain the necessary information to notify the market of the different areas responsible for their preparation within the Group, which will allow it to assure consistency and homogeneity of the information.

The principles and channels covered by this policy govern, where applicable, the relations with other parties concerned, such as financial analysts, managers and custodians of shares at the Bank and proxy advisors, among others.

This policy shall not apply to disclosure of privileged information or relevant information and relations with the media, that shall be regulated by their own internal regulations.



4. GENERAL MEETING OF SHAREHOLDERS

The Board of Directors promotes informed, responsible participation by shareholders in the General Meeting of Shareholders and, through its web page and other means, adopts all measures and guarantees as may be appropriate to ensure that the General Meeting of Shareholders effectively performs the functions inherent to it pursuant to the law and the corporate governance system of the Company.

The shareholders of Acciona Energía are called at least annually to participate in in the General Meeting of Shareholders where the company provides them all kinds of resources to facilitate their participation in the event (for example, by mail or remote voting through the corporate web, or when so established by the Board of Directors, by telematic attendance at the Meeting).

Furthermore, at the time of its General Meetings, Acciona Energía provides its shareholders the necessary information to decide on the matters submitted for their consideration, that information being published enough time in advance and in the detail required not only by the law but also by the best national and international good governance practices.

Likewise, Acciona Energía also enables in its webpage the Shareholders' Electronic Forum for the Meeting, that the shareholders may access in order to facilitate communication prior to the Meeting being held.

The General Meeting of Shareholders is broadcast live, through the corporate web page, when this is established by the Board of Directors; it may be attended telematically through the link included on the Company web page, in the "shareholders and investors" section.

These measures are intended to create an open environment that allows participation at the General Meeting by the shareholders to be facilitated, so they may exercise the rights to which they are entitled in their capacity.

In addition to the channels stated above, an information sending service is offered that, at the request of the user, allows the news published on the corporate web page in relation to financial reports, communication of privileged information or relevant information notified to the CNMV, or economic-financial presentations and non-financial information to be known in real time.

This Policy was approved by the Board of Directors of Acciona Energía on 14th July 2021, the date as of which it is applicable.
