

WHAT IF THE SMARTEST DECISION WAS TO INVEST IN THE PLANET?

MODERN SLAVERY STATEMENT 2020



BUSINESS AS UNUSUAL

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Letter from the CEO

BEDE NOONAN

ACCIONA's FY20 Modern Slavery Statement is being published amid one of the most difficult years in recent history. The COVID-19 pandemic has affected organisations and supply chains around the globe, with the issue of unemployment and pressures to reduce costs likely to have heightened the risk of modern slavery violations.

Our priority has been to preserve the health of ACCIONA's people and those with whom it deals. I believe we can be proud of this, and I would like to say thank you to our people, particularly those within Australia and New Zealand.

Our business was classified as a critical service during 2020, which enabled our operations to continue largely unaffected, but not without some interruption along the way. The fact of our ongoing operation throughout 2020 ensured our supply chains could continue to function, and payments could continue to be made to our suppliers.

During the pandemic we continued to champion the need to act responsibly and sustainably, promoting inclusion and human rights, environmental stewardship, and economic growth.









An integral part of this focus is our commitment to implement our Modern Slavery Action Plan through which we seek to drive change and mitigate the risk of modern slavery occurring in our operations and supply chains long term.

I am pleased to present our inaugural Modern Slavery Statement which represents our efforts in 2020. Although the pandemic presented limitations, we took an in-depth look at the risk of modern slavery in our business by engaging with specialists and technology providers with relevant expertise in the modern slavery space. This due diligence provides a solid basis to guide our efforts for years to come.

The results were pleasing. However, we remain cognisant of the inherent risks in our industry and note that our industry in general, including a large business such as ACCIONA, has a long way to go before it can confidently say the risk of modern slavery occurring in supply chains is extinguished. We will continue to drive improvement and plan to undertake several initiatives to enhance our performance in this regard, striving towards a sustainable and ethical future for all stakeholders.

Bede Noonan

ACCIONA's CEO in Australia & New Zealand

Area	Summary of Actions Completed	Mandatory Criteria Addressed
 Entities and Structure	<ul style="list-style-type: none"> ➤ Identified reporting entities ➤ Described ACCIONA's structure, operations and supply chains as reflected on pages 5-8 of this Modern Slavery Statement 	1 and 2
 Policies and Protocols	<ul style="list-style-type: none"> ➤ Created our Modern Slavery Policy and Modern Slavery Procedure specific to Australia, complementary to our existing global Code of Conduct and Human Rights Policy ➤ Updated our contracts with subcontractors to drive compliance with our policies and protocols related to ethical sourcing 	3 and 4
 Due Diligence	<ul style="list-style-type: none"> ➤ Categorised first tier suppliers based on industry and geography to drive risk assessment ➤ Mapped and assessed our comprehensive supply chain ➤ Performed in-depth analysis on tiers wherein influence and spend would be focused 	3 and 4
 Remediation	<ul style="list-style-type: none"> ➤ Global Ethical Channel provided to all employees, suppliers and any third party to report breaches of our Code of Conduct including occurrences of modern slavery 	3 and 4
 Training and Education	<ul style="list-style-type: none"> ➤ Committed to a tailored, internal training program with industry specialists and technology providers for executives to update the company on its modern slavery risk factors and potential avenues to mitigate them 	3 and 4
 COVID-19	<ul style="list-style-type: none"> ➤ Established protocols for safe working conditions both on-site and remotely ➤ Maintained the continuity of our suppliers to ensure minimal disruption to operations of our suppliers and reduce risk factors of modern slavery 	3, 4 and 7
 Assessing Efficiency	<ul style="list-style-type: none"> ➤ Established an ongoing review process to measure modern slavery risks in our supply chain 	5
 Collaborative Efforts	<ul style="list-style-type: none"> ➤ Engaged with key personnel across our business areas to ensure a unified and consistent approach ➤ Devised a Modern Slavery Action Plan for future years 	6 and 7

At a glance – Reporting Criteria 1 & 2

What ACCIONA was in 2020

ACCIONA is an end-to-end developer of sustainable infrastructure based on a distinctive vision

Our history

ACCIONA is a group unlike any other in Australian infrastructure and construction.

We have earned a reputation, over fifty years, as a leading provider of specialist construction services for sustainable infrastructure.

How? Because construction engineering is at our very core.

Our group brings together trusted and long-standing Australian businesses:

- Geotechnical Engineering;
- Coleman Rail;
- John Beever Australia,

with the major project capabilities of:

- ACCIONA Construction Australia;
- ACCIONA Infrastructure Australia;
- ACCIONA Infrastructure Projects Australia (formerly Lendlease Engineering), and

the international resources of ACCIONA.

Locally, our story traces back to 1972, when Geotech Pty Ltd was founded by the Noonan and Macleod families after a management buyout of Foundation Engineering.

The new group was responsible for some of Melbourne's most iconic projects; names like Collins Place (at the time, the largest excavation in the history of Melbourne), the Melbourne Underground Rail Loop, the Victorian Arts Centre, Citylink and the Burnley Tunnel. Within a few short years, Geotech became a leading ground engineering supplier to large constructors whose projects were defining the Melbourne cityscape.

As the century turned, a new generation of the Noonan family, brothers Bede and Andre, bought the business from their retiring father, adding rail capability with the acquisition of B.T. & K.A. Coleman, an Australian rail contractor that was founded in 1983, and a mechanical engineering arm with the acquisition of John Beever Australia that was founded in 1979. These three businesses became known as the Geotech Group of companies.

ACCIONA's acquisition of the Geotech Group in March 2017 harnessed ACCIONA's global expertise to Geotech's local knowledge, creating a complement of family owned businesses that could grow and challenge the established players. Albeit family owned, ACCIONA is a truly global company with over 40,000 employees across five continents, with a business model based on sustainability: infrastructure, renewable energy and water treatment projects. ACCIONA has been in Australia since 2002, when it established a presence in the renewable energy market. Not long after, ACCIONA established its water business with the Adelaide Desalination Plant and Mundaring Water Treatment Plant. Then 2011 saw the local capability extend to major infrastructure, with the award-winning Legacy Way tunnel in Brisbane marking the beginning of a commitment to sustainably developing major infrastructure the region.

The 2017 deal was carefully structured to leave Australian equity, management and technical expertise in place, while drawing on ACCIONA's international expertise. The two businesses had a lot in common – family ownership, strong leadership and a commitment to innovation and sustainability. ACCIONA stepped up its multi-billion-dollar investments in renewables and civil infrastructure in Australia, gaining momentum from its newfound access to a long-standing workforce, and no longer having to set up project-by-project.

Late in 2020, we acquired Lendlease Engineering, with its valuable pipeline of projects and people capacity. It was another landmark moment for ACCIONA in Australia and further ingrained our Australian roots. Lendlease Engineering's own history dates to 1912, when Hornibrook Constructions was founded. The evolution of Lendlease Engineering included construction giants such as AW Baulderstone (incorporated in 1946, later becoming Baulderstone Hornibrook in 1985) and G Abigano (registered in 1961, with the name changed to Abigroup in 1988). These companies helped deliver some of Australia's most significant transport and infrastructure projects, such as four of the nation's most iconic bridges in Brisbane's Story Bridge and William Jolly Bridge, Sydney's Anzac Bridge and Melbourne's Bolte Bridge, as well as the new Adelaide Oval, the superstructure of the Sydney Opera House and the M2 Motorway in Sydney.

ACCIONA Construction Australia is our major project delivery arm with expertise in sustainable transport infrastructure solutions, clean energy infrastructure – wind power, solar photovoltaic (PV), waste-to-energy – and water treatment infrastructure.

Geotechnical Engineering, our longest-established business, boasts the most experienced ground engineering design and construct team in the nation, with almost fifty years at the frontline of design and delivery.

Coleman Rail is our rail infrastructure business that is approaching twenty years of achievement in this technically complex and challenging arena.

John Beever Australia is a leading structural, mechanical, piping, and electrical company, serving the manufacturing, infrastructure, industrial and renewables sectors.

ACCIONA in Australia also operates in Energy, Concessions and Agua (Water). This Modern Slavery Statement does not reference those entities as they sit outside of the ACCIONA Construction corporate group.

All our entities' executive operations meet centrally at our office in Port Melbourne, where our workers have banged their boots at the door for decades now. The site was an industrial corner of the Yarra River, a working-class stronghold near where we built some of our earliest projects; now it is a suburb on the rise and a home to future technologies. In some ways, Port Melbourne has mirrored our own evolution. We also run corporate offices in Sydney, Brisbane and Perth.

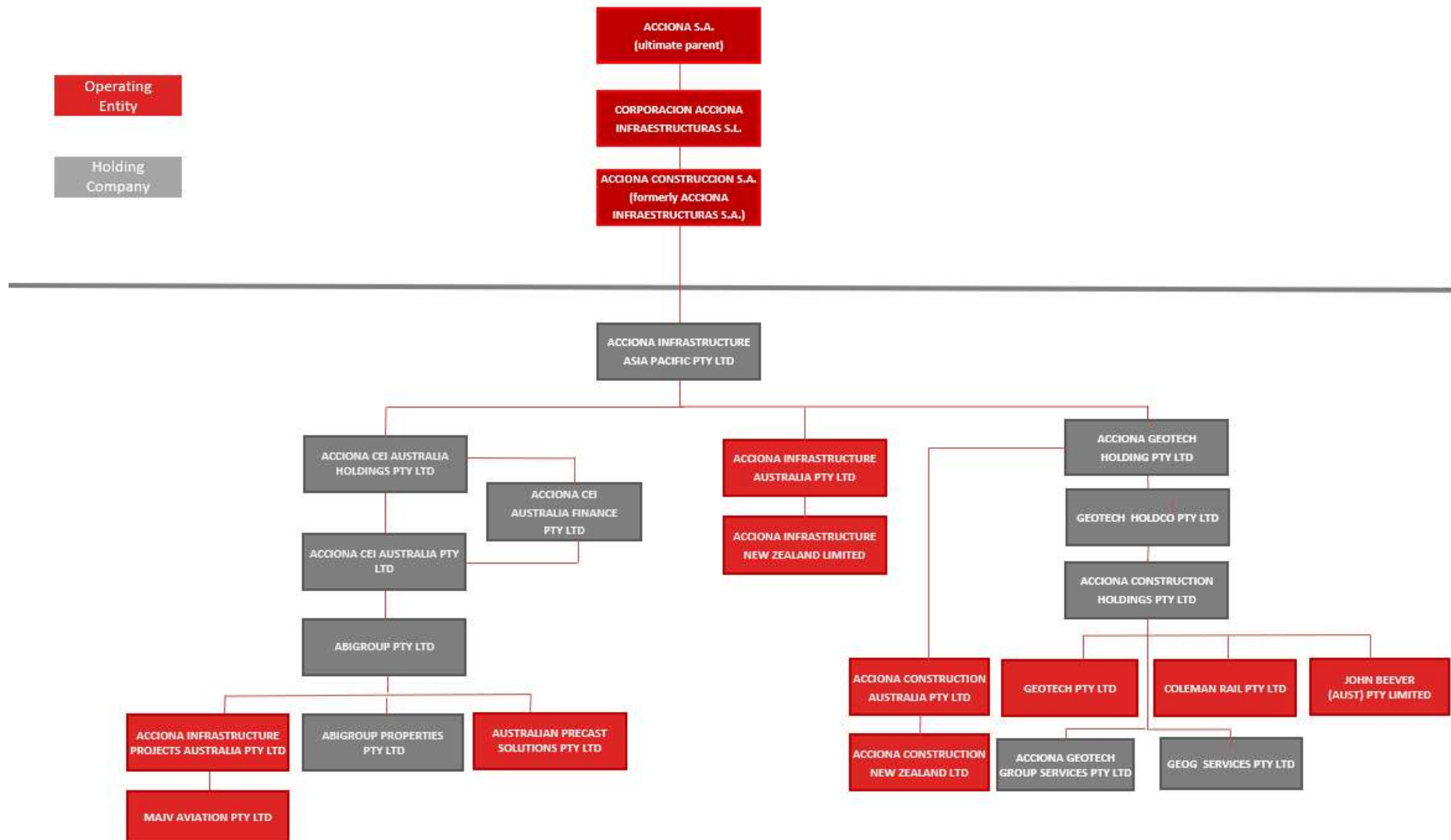
Our reporting entities

Acciona Infrastructure Asia Pacific Pty Ltd ABN 19 609 210 139 (**ACCIONA**) is the Australian holding company through which we conduct our operations in Australia and New Zealand. It is the Reporting Entity for the purposes of this Modern Slavery Statement.

This Modern Slavery Statement has been prepared on a consolidated basis and approved by the Board of Acciona on behalf of its controlled entities which are also classified as reporting entities pursuant to section 5(1) of the *Modern Slavery Act 2018* (Cth):

- Acciona Infrastructure Australia Pty Ltd (ABN 52 140 915 251)
- Acciona Infrastructure Projects Australia Pty Ltd (ABN 40 000 201 516)
- Acciona Construction Australia Pty Ltd (ABN 66 618 030 872)
- Coleman Rail Pty Ltd (ABN 81 101 299 512)
- Geotech Pty Ltd (ABN 94 114 336 515)
- John Beever (Aust.) Pty Limited (ABN 84 006 337 113)
- Acciona Geotech Holding Pty Ltd (ABN 99 616 868 314)
- Geotech Holdco Pty Ltd (ACN 616 740 820)
- Acciona Construction Holdings Pty Ltd (ABN 59 114 553 454)
- Acciona CEI Australia Holdings Pty Ltd (ABN 50 147 880 966)
- Abigroup Ltd (ABN 63 000 358 467)
- Acciona CEI Australia Pty Ltd (ABN 52 106 594 816)
- Acciona CEI Australia Finance Pty Ltd (ABN 18 122 363 295)

ACCIONA's corporate structure is shown in the diagram on the next page.



Operations

What ACCIONA did in 2020



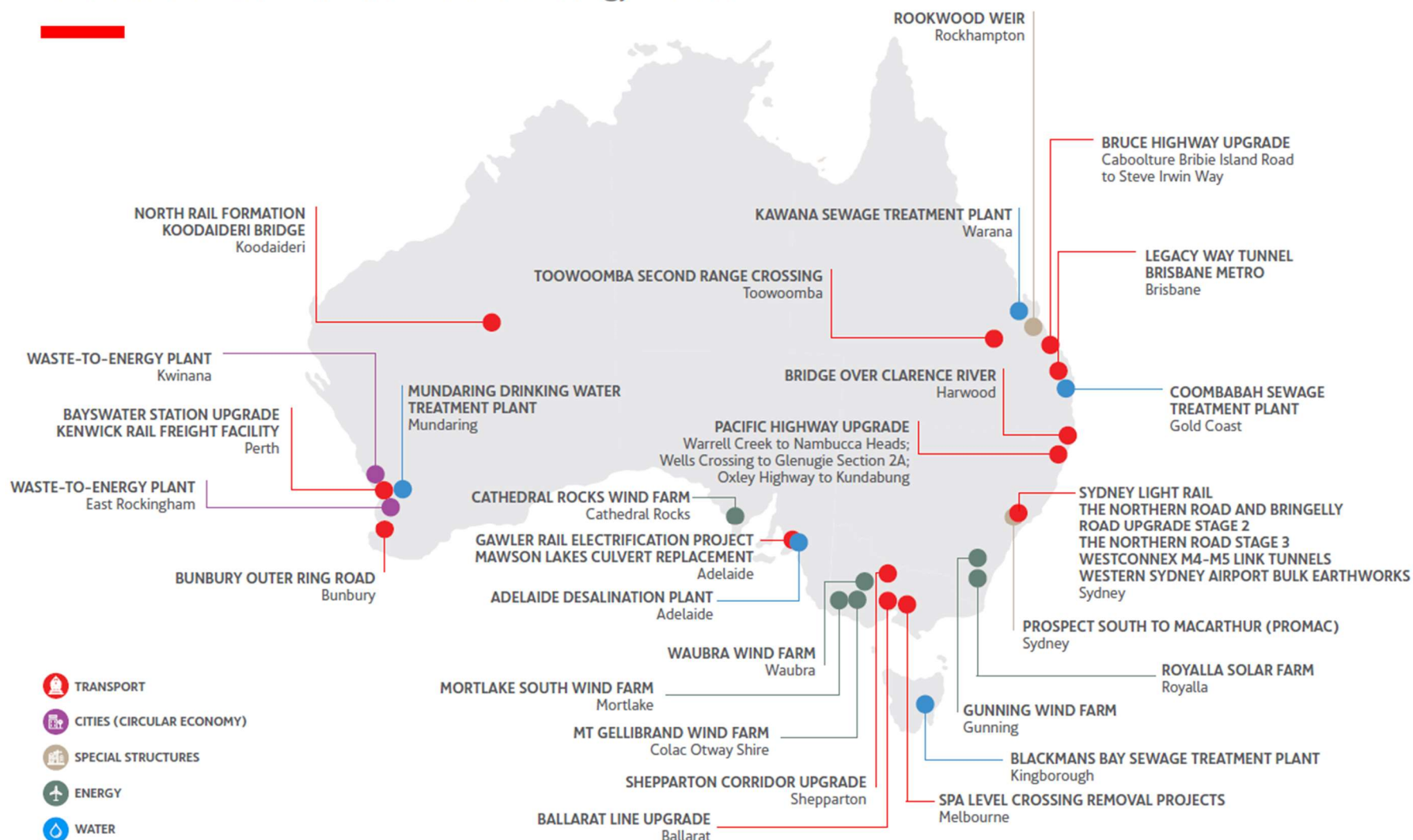
Basic Infrastructure, Advanced Approach

ACCIONA offers itself as an expert in designing a better planet, responding to basic infrastructure, water and energy needs through innovative, responsible solutions that produce real progress. ACCIONA's projects span wind and solar farms, tunnels, bridges, railways, light rail, roads, water treatment plants and waste-to-energy plants within Australia.

ACCIONA develops solutions to adopt a comprehensive approach to the global challenges that the world faces today and follows a S.M.A.R.T. business model based on: Sustainability, Mitigation, Adaption, Resilience and Transformation. We are committed to a low carbon economy and helping to solve some of the most complex challenges facing humanity such as clean energy, efficient, low-emission transport, water scarcity, the right to decent housing, the right to decent work via sustainable and inclusive economic growth and the social infrastructure shortfall, and waste management.

EXPERTS IN DESIGNING A BETTER PLANET

One of Australia's most trusted providers of sustainable infrastructure and renewable energy solutions.



Workforce

As of 31 March 2021, ACCIONA has a workforce comprising 3278 people:

Staff Type	Number of Staff
Blue collar staff	1239
Professionals and office staff	2039
Direct employees	3079
Contingent workers	199

We used March 2021 data rather than year end 2020 data, as the data more accurately reflects the workforce and employee/contractor breakdowns post acquisition of Acciona Infrastructure Projects Australia Pty Ltd (formerly Lendlease Engineering Pty Ltd) in 2020 (due to the system migration limitations typical of an immediate post acquisition environment).

Our workforce consists of many professional employees, all of whom are subject to the robust regulatory framework of Australia and New Zealand.

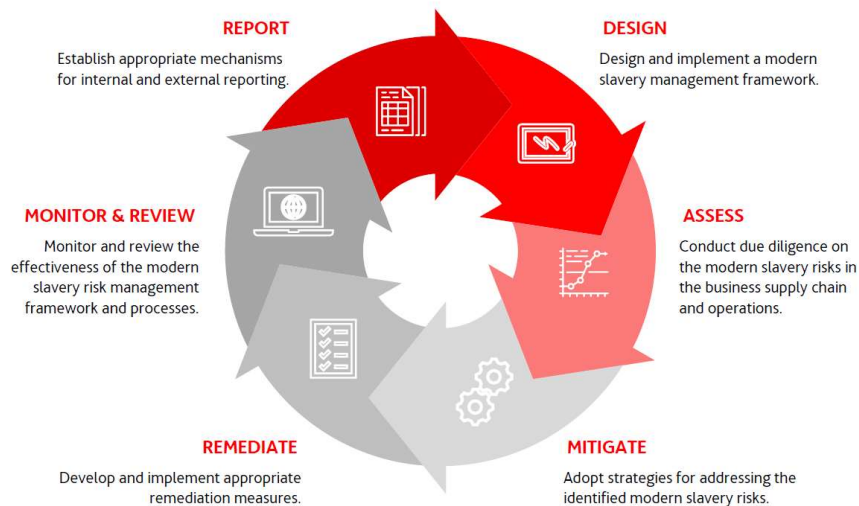
Aside from 16 “blue collar employees” who are not covered by an award or represented under an enterprise bargaining agreements (they are employed under a standard ACCIONA employment agreement), all of the remaining employees in FY2020 were subject to enterprise bargaining agreements that were negotiated and achieved mutually beneficial outcomes for us as an employer and those employees. These agreements and union representation of workers' rights helps ensure ACCIONA's risk of modern slavery in our direct operations is significantly mitigated.

In addition, ACCIONA has a strong human resources department directed by a skilled executive leadership team which allows us to screen, onboard and oversee employees in a thorough manner. This, in turn, allows ACCIONA to mitigate risks of modern slavery occurring in our direct operations by monitoring employee adherence to our codes and standards to ensure they and ACCIONA act in an ethical and professional manner.

ACCIONA also instituted a global Ethical Channel to provide our employees, as well as providers and third parties, an avenue to confidentially report any breach of the Code of Conduct. The Ethical Channel acts as an important safeguard and tool for ACCIONA and our employees to hold each other accountable as we pursue ethical and sustainable conduct.

In Australia, ACCIONA has instituted a Whistle Blower Policy Statement to clearly outline our stance on deterring unacceptable conduct and promoting compliance with the law and a broader culture of integrity and personal accountability. In addition, the complementary Whistle Blower Procedure outlines the protections that whistle-blowers are afforded when making reports, including access to support from external service providers via our Employee Assistance Program.

Identifying risks of Modern Slavery Practices – Reporting Criteria 3



How ACCIONA conducted due diligence

ACCIONA, in conjunction with technology provider FairSupply, undertook an in-depth analysis of our supply chain, going beyond our first-tier suppliers and reviewing the risk of modern slavery occurring within our supply chain. ACCIONA understands that at the time the Fair Supply analysis was completed, only 8% of companies that had submitted Modern Slavery Statements had undertaken such in depth analysis of their supply chains.

The assessment used a multi-regional input-output table to map the supply chain of the industries and countries into which each our spend item or investment falls. This process identified the theoretical inputs required from different industries in different countries around the world to produce the demand represented by the first tier spend or investment. FairSupply then applied a theoretical slavery footprint to estimate the probable slaves associated with the value spent at each tier, industry and country throughout the supply chain. The theoretical methodology then mapped the supply chain up to 10 tiers of inputs.

In doing so, ACCIONA was able to generate a holistic top-down view of where any risk of modern slavery may reside in order to determine appropriate steps.

ACCIONA provided its first-tier supplier data which was categorised by both industry and geography to assess the modern slavery risks posed by our suppliers (in the first tier) and their

respective supply chains. The identified risk factors will in turn form the basis of ongoing due diligence in the years to come as we will effectively screen our potential suppliers depending on whether they are exposed to our identified high-risk categories.

Subjecting our total of 3703 suppliers to a materiality filter, the assessment analysed 1424 first tier suppliers. 1412 are located in Australia and New Zealand, indicating a low level of geographical risk of modern slavery occurring within the first tier of our supply chain. The strong regulatory frameworks provided by these jurisdictions operate as a significant deterrent to modern slavery practices among our suppliers in such jurisdictions.

In-depth analysis – Industry risk

However, geographic risk is a singular factor in a broad range of modern slavery risk factors. As such, ACCIONA also categorised spend data for first-tier suppliers based on the industries in which they operate. The results of such analysis allows ACCIONA to understand the aspects of its operations most at risk of modern slavery and to develop appropriate, tailored solutions to effectively mitigate such risks.

We have identified the following key industries and certain geographies in our supply chain that can have elevated risk of modern slavery:

- Non-building construction – Australia
- Business Services – Australia
- Metal products – China
- Concrete products/gravel – Australia
- Electrical Equipment – Australia
- Cement, Lime, Concrete, Non-metallic minerals and ground minerals – Australia
- Concrete Products – Australia
- Non-building construction, Industrial machinery and Electrical Equipment – Australia
- Structural Metal Products – Australia
- Roads and Bridges – Australia
- Fabricated Metal Products – Australia
- Employment Placement and Business Services – Australia
- Non-metallic mineral products – Australia

ACCIONA will continue to monitor key suppliers within these industries as well as implement a review procedure for any potential suppliers operating within these key industries. This will allow for a targeted approach towards key risk factors of modern slavery within our supply chain.

In-depth analysis – Top 3 industries beyond tier one

An integral part of our due diligence was the need to go beyond the first tier of our supply chain. Using a sample of suppliers within our first tier, ACCIONA was able to identify where our spend was being directed.

To gain a more holistic view of our risk exposure, we identified our top three industries by spend in the first tier of our supply chain. Those industries were Australian concrete products, Australian business services and Australian non-building construction. Our spend with first-tier suppliers in these three industries represented 31.9% of our total spend data. We then traced our spend and related risk exposure in these industries to the third tier of the supply chain.

The decision to extend to the third tier for this analysis was based on understanding that as we go further down the supply chain to the tenth tier, our ability to exert influence diminishes. However, a possible concentration of our spend in the first three tiers allows for some degree of influence to enact broader change.

The results of our in-depth analysis yielded positive results. Despite representing almost one-third of our spend, the suppliers in these industries and jurisdictions only represented 7% of the total number of potential slaves existing within our supply chain (consisting of up to ten tiers).

Combined with our broader data, these findings demonstrate that ACCIONA's risk of modern slavery exists outside the majority of our spend and is deeper in our comprehensive supply chain. This indicates that ACCIONA is less likely to have directly caused or contributed to modern slavery.

Despite these positive results, ACCIONA endeavours to take action to ensure ethical and sustainable outcomes for all stakeholders involved in our operations and supply chains. ACCIONA instituted its Modern Slavery Action Plan to put in place the infrastructure and procedures necessary to reduce our risk of modern slavery in both our operations and our supply chains in the upcoming years.



Actions taken to address risks and assessment of the effectiveness of such actions – Reporting Criteria 4 & 5

How ACCIONA addressed modern slavery

ACCIONA engaged experts within the modern slavery space to create our Modern Slavery Action Plan to be reviewed and maintained over the next several years.

Operations

To inform our ongoing actions in relation to the risk of modern slavery within our operations, ACCIONA formulated a Modern Slavery Policy Statement to outline our understanding and ongoing commitment to mitigating risks of modern slavery within our operations.

As part of this, ACCIONA undertook an internal review of our employment policies to ensure our compliance with the relevant law and confirm that ACCIONA's staff are not subject to illegal working conditions.

ACCIONA's staff is subject to numerous enterprise agreements under Australian law which were determined to comply with the Australian Building and Construction Commission. Our operations are primarily based in locations with strong legal frameworks and regulatory oversight. In complying with these laws and regulations, ACCIONA is able to ensure that the risk of modern slavery occurring in our operations, specifically our staff, are comparatively low to those with offshore operations in other countries, specifically those in the Asia-Pacific region.

ACCIONA's Code of Conduct, Human Rights Policy and Modern Slavery Policy demonstrate that we are committed to respecting human rights and public freedoms recognised in the United Nations Universal Declaration of Human Rights. Respect for human rights is the responsibility of all persons and entities to which the Code of Conduct applies, including all businesses and project managers.

Further to the codes and policies above, our global Ethical Channel provides our employees as well as suppliers or third parties with a mechanism by which they can confidentially report any breach of the Code of Conduct and access solutions for the resolution of such behaviour. This includes any instances of modern slavery and human rights violations more broadly.



Case Study – Building Responsibly Committee

ACCIONA is part of the Steering Committee on *Building Responsibly* since 2018.

We aim to respond together more effectively to stakeholders, regulation, customer expectations and manage workforces.

We adopted a list of principles to ensure workers are treated with dignity, are free from forced, trafficked and child labour, recruitment practices are ethical, legal and voluntary and working/living conditions are safe, clean and healthy.

Supply chain

As described above, ACCIONA's highest theoretical risk of modern slavery occurs beyond the first tier of our supply chain and thus our ability to influence those suppliers is limited. Despite this, ACCIONA has undertaken some actions to put in place a framework in which our modern slavery strategy can be implemented.

- through the supplier portal and the group's tendering tool, ACCIONA establishes various mechanisms that help prevent the violation of human rights throughout its supply chain, including: Self-Declaration of Responsibility for Suppliers, Contractors and Collaborators including a comprehensive Supplier Questionnaire
- Supplier Evaluation and Approval Procedures
- general contracting clauses
- processes to enable no-go decision making if material issues are identified with a supplier

These factors allow ACCIONA and its suppliers to understand ACCIONA's commitment to the welfare and ethical treatment of workers. The institution of these elements allows ACCIONA to be confident that our suppliers remain in line with our values.

In 2019, the company did not identify any suppliers or contractors who violated or endangered human rights compliance

In addition, the results of our analysis in collaboration with our technology and legal advisors will form the basis of ongoing assessments of our modern slavery risk as well as a provide a framework for screening future potential suppliers as well as improving current supplier relationships with regard to modern slavery. The geographical and industry data gleaned from the analysis will allow ACCIONA to understand potential suppliers and conduct any further due diligence, if necessary, depending on their particular risk profile.

Collaboration & leadership

ACCIONA believes companies have a responsibility to respect human rights and a great opportunity to improve and transform people's lives. Thus, ACCIONA, as well as around 30 others from other multinational companies, called for urgent business leadership in the respect for human rights through the World Business Council for Sustainable Development's CEO Guide to Human Rights. Further information on this collaborative approach can be found in ACCIONA's Global Sustainability Report 2019.

ACCIONA is also involved with joint venture partners on specific projects in Australia where parties are combining their collective efforts to address the risks of modern slavery in their project-specific supply chains. Further, ACCIONA became a member of the ISCA Modern Slavery Coalition working with other large stakeholders to educate first tier suppliers on modern slavery risks in potentially problematic industries such as bitumen and PPE. ACCIONA's involvement in the Coalition will continue in 2021.

Training

ACCIONA will soon embark on several tailored training programs for the executive suite conducted by modern slavery specialists and technology providers to provide an overview of modern slavery and how it affects our operations and supply chains. This training is in addition to global training sessions available to all ACCIONA staff, launched in 2019.

ACCIONA will also be providing ongoing training modules for all members of staff to equip our workforce to adequately identify and reduce practices that may be at risk of modern slavery. These training modules will be mandatory and are an essential element in creating a collaborative and unified approach across our organisation to reduce the risk of modern slavery occurring in our operations and supply chains.

Consultation with entities that the Reporting Entity controls – Mandatory Criteria 6

ACCIONA recognises that each entity within our Group, including each of the reporting entities pursuant to the *Modern Slavery Act 2018* (Cth), has an integral role in addressing our modern slavery risks. As such, ACCIONA engaged with key stakeholders within our entities to ensure a holistic approach to identifying and then mitigating modern slavery risk in our operations and supply chain.

The consultation process included making requests for information, liaising on potential risk factors and agreeing a Modern Slavery Action Plan to form a group-wide approach to modern slavery avoidance.

From this consultation process, ACCIONA created a Modern Slavery Action Plan to inform our strategy and approach to modern slavery for the upcoming years subject to ongoing review of the efficacy of our actions. ACCIONA will also establish a Modern Slavery Committee in 2021, comprising representatives across the Reporting Entities, entrusted to implement our Ethical Sourcing (Anti-Modern Slavery) Procedure, review progress on the actions set out in the Modern Slavery Action Plan and be responsible for Modern Slavery mitigation metrics across the ACCIONA Group.

COVID-19 Impacts

In April 2020, the Australian Border Force issued an information notice asking businesses to consider the impacts of COVID-19 on modern slavery risk mitigation and to provide comment in their Modern Slavery Statement.

How ACCIONA mitigated the pandemic

Operations

ACCIONA recognises the impact of the COVID-19 pandemic on our operations and supply chain and the potential heightening of modern slavery risk. During periods of economic uncertainty and downturns, the risk of labour exploitation increases as economic uncertainty sees companies pursuing cost savings to maintain profitability.

The pandemic has also reduced the capability of ACCIONA to implement our modern slavery strategy as contemplated due to resourcing constraints, constraints on working arrangements and movement and being prevented from obtaining any direct visibility of offshore suppliers as a result of remote working conditions and travel restrictions.

ACCIONA's main operations were determined to be an essential service by the Australian Government during the pandemic and thus our operations were largely uninterrupted. As we worked through the pandemic, ACCIONA took a proactive approach to ensuring the safety of our people and implemented several changes to the working conditions for our onsite workers as well as remote working.



Case Study – COVID-19 Testing: Business Continues

400 plus construction workers at a Victorian project site were supplied with face masks daily.

Each of these masks were then disposed of into QR coded, ziplocked bag which was sent for testing.

Within six hours, the workers received messages advising of the results of the mask testing. This almost 'real-time' confirmation of whether employees were COVID-19 free enabled ACCIONA to maintain a safe working environment and reduce the risk of project/site shutdowns.

ACCIONA has consulted with its entities that have reported the COVID-19 pandemic has had low impact to operations and supply chains because of the COVID-19 pandemic. This was a result of COVID-safe working conditions applied by ACCIONA across our project sites and a strong continuity of our business operations within Australia.

Supply chain

Travel restrictions, severe economic contraction and limited transparency during the COVID-19 pandemic had the potential to cause significant increases in modern slavery risk within our supply chains.

ACCIONA's resilience in the pandemic allowed for relatively uninterrupted operations which, in turn, led to the maintenance of our spend with our suppliers.

In ensuring the continuity of our supplier relationships, ACCIONA was able to mitigate instances in which suppliers would have to alter their operations and supply chains due to cancelled or delayed orders and the resulting losses. We recognise such cancellations and delays could increase the instances of modern slavery occurring offshore, particularly as top tier suppliers seek inputs further downstream to cheaper, more risky suppliers.

2021 and Beyond – Mandatory Criteria 7

What ACCIONA will be in 2021

ACCIONA remains committed to ongoing improvement to our operations and supply chains in terms of modern slavery.

The elements discussed in the previous sections of this statement are just some of the aspects of our Modern Slavery Action Plan that we will continue to develop and refine based on our assessments and lessons learned.

In the upcoming months, ACCIONA intends instituting the infrastructure for ACCIONA to identify, address and mitigate modern slavery risk in a more efficient manner.

Operationally, we intend to:

- implement additional changes to our policies and protocols;
- establish a Modern Slavery Committee comprising representatives across the Reporting Entities, entrusted to implement our Ethical Sourcing (Anti-Modern Slavery) Procedure, review progress on the actions set out in the Modern Slavery Action Plan and be responsible for Modern Slavery mitigation metrics across the ACCIONA Group;
- implement training and education sessions for our executive suite and wider team members;
- revise our Whistle-blowing Procedure and Grievance Procedure; and
- introduce a whistle blowing hotline administered by a third-party provider, accessible to our employees, contractors and suppliers,

For our supply chains, we intend to:

- conduct ongoing due diligence with our technology providers to undertake a year-on-year review of changes in our modern slavery risk profile;
- implement screens relating to the results of our due diligence;
- revise our supplier agreements to directly address modern slavery; and
- collaborate extensively with suppliers to ensure ongoing dialogue and education on the risks of modern slavery.

This continued development of our processes will be a significant undertaking but will be instrumental in upholding the key commitments of ACCIONA for a better, sustainable future for all.



BUSINESS AS UNUSUAL

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