

Response from ACCIONA ENERGÍA

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Is ACCIONA ENERGÍA applying a single global standard, aligned with the legal requirements set forth in the UFLPA, to exclude Uyghur forced labour across its supply chains, and to not bifurcate its supply chains?

Yes, not only for Uyghur, but for any community/region/country that can employ Forced Labour.

Is ACCIONA ENERGÍA committed to not re-exporting goods detained under the auspices of the UFLPA to other markets?

ACCIONA Energía cannot re-export as it does not purchase goods that may be outside the UFLPA.

If ACCIONA ENERGÍA is committed to the above statements, how is it implementing these commitments?

In 2021, the company approved the new Policy on Human Rights included in the Policy Book of ACCIONA Energía, which reflects the commitments and principles of action applicable to all the Group's companies. In line with this commitment, the Supply Chain Department thoroughly monitors each of our suppliers for compliance with our company's ESG standards. Additionally, all providers with annual volume of more than €5m are also subject to the auditing, not just of their own operations, but also of their respective suppliers down the chain (Tier II) for full ESG compliance and in particular with respect to human rights. ACCIONA Energía ("ANE") mandates supply chain auditing specialist Achilles <https://www.achilles.com/> or Go Supply <https://www.mygosupply.com/> for these audits. We note that the contracts related to main components (modules, structures/trackers, inverters, wind turbines) all go above the €5M threshold, and therefore these suppliers and their respective supply chains are audited.

With respect to the supply of PV modules, ACCIONA Energía has been working exclusively with JA Solar since 2017 and to date they keep winning our tenders on the back of not just price, but also sustainability scoring, product quality, technical bid, and service.

Since 2018, ANE does not only audit JA Solar, but also the Tier II suppliers, and we have requested a letter to JA Solar where it commits to fulfil all of ANE's ESG standards, with particular emphasis on human rights compliance across their own supply chain. All the orders placed in 2021 have as a requirement not only to audit (Achilles) the Tier II but also the polysilicon suppliers whether Tier III or Tier IV, these audits are in progress (see attached).

In 2022 we have signed new contracts with Waree (India) and Vina Solar (Vietnam) for the supply of components in 2023, and they are undergoing the same process.

It should be emphasized that contractually compliance with UFLPA requirements is required, monitored through ESG audits, the origin of the components is confirmed in the Quality audits in the production phase, in addition to meetings between the parties (Supply Chain and Engineering and Construction of ACCIONA Energy and the supplier).

In summary, we are confident that we can guarantee that the supply chain of our equipment providers meets the ESG standards, in particular with respect to human rights.

If ACCIONA ENERGÍA is not committed to a single global standard, how is it ensuring that goods imported into markets other than the US are not tainted? [The process is applicable to all countries where ACCIONA Energía operates.](#)

Please, also find attached the statement on production of JA Solar as evidence of its commitment with the respect of human rights.