

economic dimension

- a. transparent businesses
- b. sustainability in the supply chain
- c. innovation at the service of people and the environment

transparent businesses

2009 milestones

- Sustainability Committee established within the Board of Directors.
- Strategic Business Plan 2010-2013 presented.
- Risk Map updated.
- Crisis Management Plan designed.

2010 goals

- Include sustainability criteria in the Company's risk assessment.
- Adopt more demanding international standards with regard to integrity and transparency.

A year of economic uncertainty

The year 2009 was marked by uncertainty: in the markets, in companies, and in society as a whole.


ACCIONA is convinced that the response to the crisis lies in strengthening the economy through transparency, responsibility and integrity, where success is measured and rewarded according to one's ability to contribute to global progress.

ACCIONA's strong diversification, its solid business foundations and the principles

guiding its commitment to development and sustainability are helping it to weather the consequences of the economic slowdown.

ACCIONA's long-term approach is set out in the Strategic Plan 2010-2013, which is a continuation of the current business strategy in order to respond to the needs of a global model of sustainable development, thereby assuring long-term growth and profitability.

Half of ACCIONA's Board directors are independent, compared to an average of **37.3%** in the Ibx 35 as a whole



Good governance, the key to transparency and integrity

ACCIONA understands that transparency and building a relationship of trust with all its stakeholders are essential to fulfilling its business commitments.

In the last few years, ACCIONA has gradually adopted the corporate governance recommendations and complies with the bulk of the Unified Code of Good Governance.

Key issues:

- Independent directors account for 50% of the Board of Directors (compared with an average of 37.3% in the IBEX 35 companies);
- Women represent 18% of the Board of Directors (IBEX 35 average = 8.7%);
- Three committees (Audit, Appointments and Remuneration, and Sustainability) are chaired by independent directors. ACCIONA also has an Executive Committee made up of independent directors.

In pursuit of rigorous compliance with all the recommendations in the Unified Code of Corporate Governance, ACCIONA has amended its Articles of Association, Shareholders' Meeting Regulation and Board of Directors Regulation to adapt

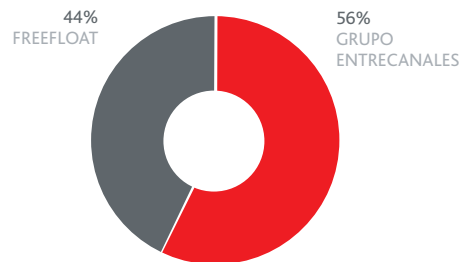
them to those recommendations, and it has also incorporated some of them into its internal rules, such as eliminating the limitations on attendance and voting at Shareholders' Meetings.

ACCIONA on the financial markets

ACCIONA has been traded on the Madrid Stock Exchange since 1997. The Company's shareholder structure is as follows:

SHARE CAPITAL (Euros)	NUMBER OF SHARES
63,550,000	63,550,000

ACCIONA's ownership structure

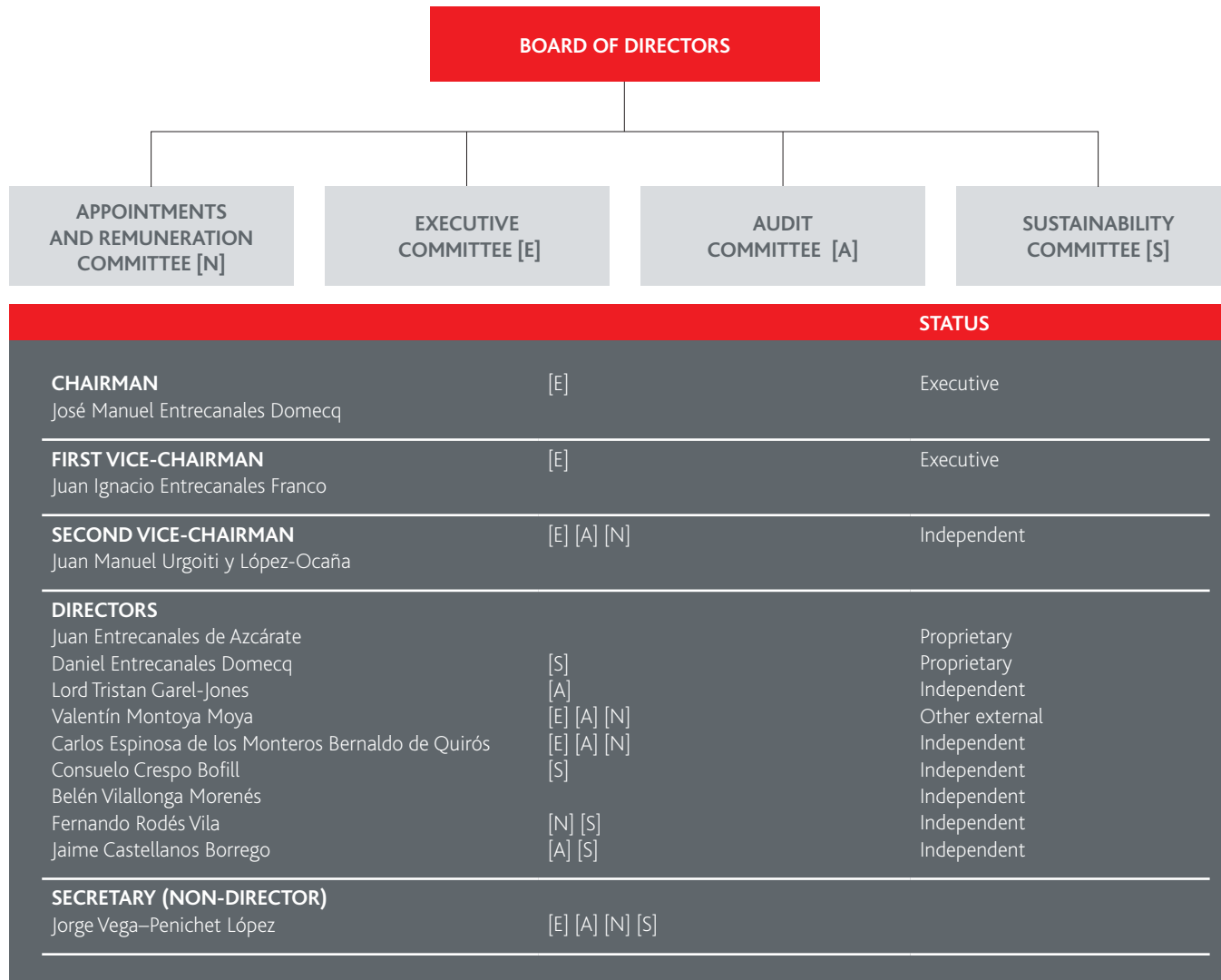


Sustainability Committee, involvement and commitment at the highest level

In 2009, the Board of Directors of ACCIONA approved the creation of a Sustainability Committee to guide and supervise policy, objectives and programmes in the area of Sustainability and Corporate Social Responsibility, to evaluate their implementation, and to periodically review compliance.

The Sustainability Committee is chaired by Fernando Rodés, who is an independent director, and it has three other members: independent directors Jaime Castellanos and Consuelo Crespo and proprietary director Daniel Entrecanales. The Sustainability Committee meets once a quarter to assess the degree of compliance with the Sustainability and Social Responsibility policies approved by the Board of Directors, and also when required to issue an opinion or a specific decision.

ACCIONA is the first Spanish company to have a specific Corporate Responsibility Committee within the Board of Directors, the Company's highest management body. This high-level involvement reflects the importance attached by ACCIONA to its commitment to sustainable development.



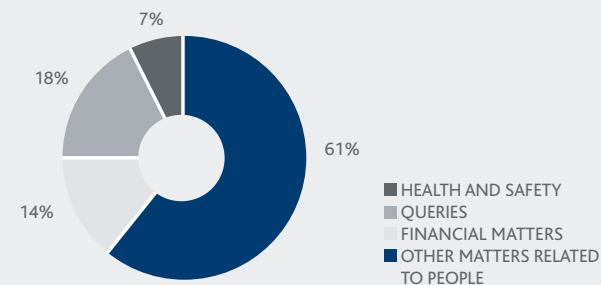
Three of ACCIONA's Committees are chaired by independent directors

The Ethical Channel, a tool for safeguarding integrity

In 2007, ACCIONA's Board of Directors approved the company's Code of Conduct with the goal of guiding the conduct of all employees by establishing a corporate culture based on integrity. The approval of the Code of Conduct led to the establishment of a Code of Conduct Committee and the creation of the Ethical Channel, through which ACCIONA employees can raise queries about the Code or provide strictly confidential reports on potential breaches of the Code. In order to guarantee absolute confidentiality of the reports received via the Ethical Channel, the Code of Conduct file was registered in 2009 with the General Data Protection Register, with ACCIONA S.A. as the responsible party, in accordance with the provisions of Act 15/1999, of 13 December, on the Protection of Personal Data.

Reports and investigations

A total of 28 reports were received through the Ethical Channel in 2009. The reported breaches were investigated and proposals for decision were drafted by the Code of Conduct Committee and presented to the Audit Committee at three meetings of the latter in 2009.



Detection and investigation of irregular conduct

The functions of the Code of Conduct Committee include investigating reports of irregular conduct, such as corruption and bribery. Based on the established procedure, investigation can be conducted by any of the following means:


- Appointment of an internal or external investigator to gather evidence.
- Personal interviews with the employees involved.
- Obtainment of evidence, reports and other documents.
- Engagement of internal or external expert consultants (e.g. IT professionals).

- Reporting the investigation to senior management in the business line.

Once the evidence has been examined, the Code of Conduct Committee issues are reported detailing recommendations and/or punishments where breaches of the Code have been detected; the Committee's conclusions are referred to the Audit Committee, which makes a decision.

At the same time, ACCIONA has an internal audit team which performs regular systematic analyses, based on internal verification and audit plans, to detect financial and/or accounting irregularities.

One of the Code of Conduct Committee's functions is to investigate allegations of corruption or bribery



Business Plans that create value

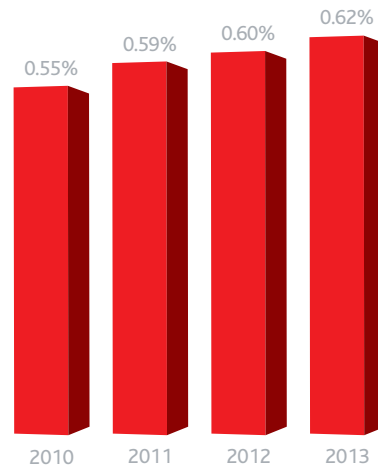
ACCIONA's business model, as set out in its 2010-2013 Strategic Plan, is the best response to the major challenges facing society now and in the future and it assures the Company's growth and profitability.

In terms of wealth creation

■ In 2013, ACCIONA will contribute 0.6% to Spain's GDP (based upon total revenues, in 2013 ACCIONA will generate business equivalent to 1% of Spain's GDP).

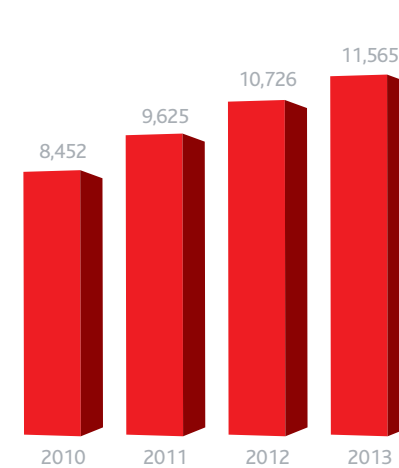
■ And it will create wealth to the tune of 40 billion euros of income over the next four years.

ACCIONA's forecast contribution to Spain's GDP



* Revenues in Spain with respect to GDP projections by the IMF (2010-2011) and Spain's Ministry of Economy and Finance (2012-2013).

Income forecast to be distributed (Million euros)



* Aggregate expenditure on suppliers and services, capital remuneration (dividends and interest expenses), personnel expenses, taxes and investment in social projects (donations and sponsorship), calculated on the basis of 2006-2009 revenues.

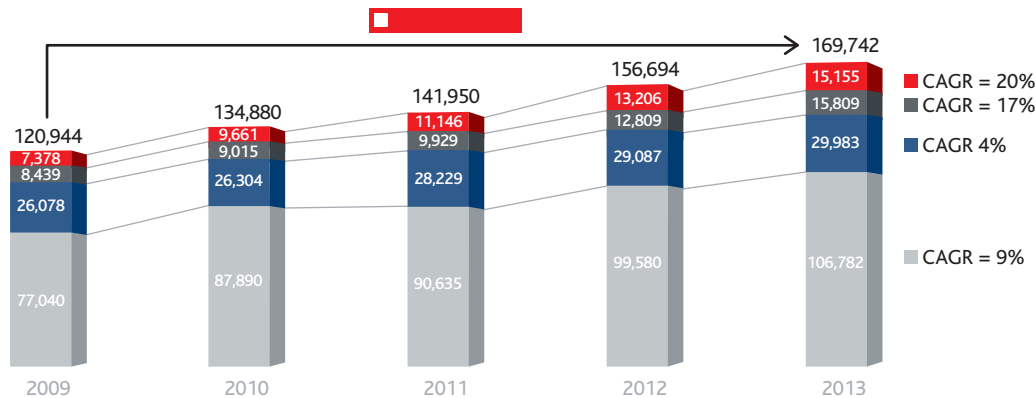
In terms of services offered and customers served

■ The users of ACCIONA's services will increase by 9% in all business areas, from

over 120 million users at present to nearly 170 million in 2013, with significant growth in energy (20%) and water (17%).

Users of ACCIONA services will reach 170 million in 2013, an average annual increase of 9%

Forecast users of ACCIONA services (thousands)



■ ENERGY ■ WATER ■ LOGISTICS ■ INFRASTRUCTURE

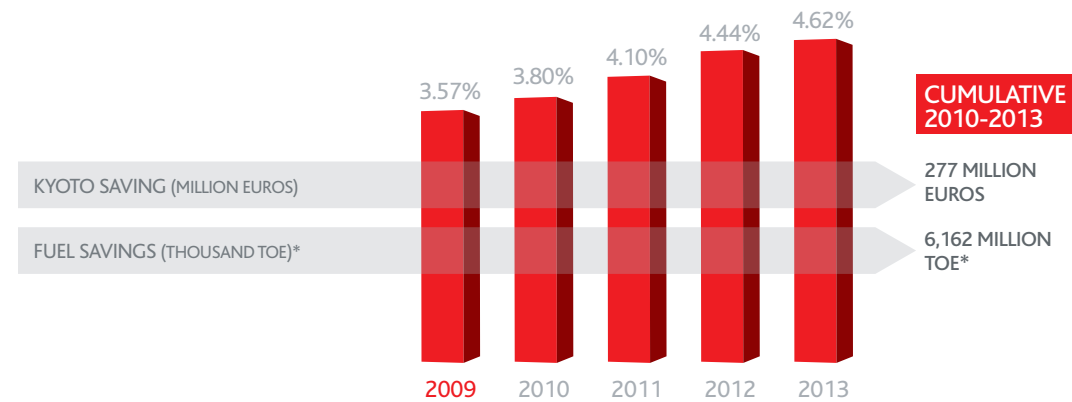
- Energy: Total energy produced on the basis of 2007-2008 investment and in line with the business plans and Spain's average household energy consumption (2007 figure from the Environment Ministry taken as a conservative estimate). Estimated number of households in 2013 as a linear extrapolation of growth between 2001 and 2007 (Source: INE). Average household size based on 2007 figure (Source: INE).
 - Water: Number of persons served by ACCIONA with services and water, based on 2007-2009 revenues.
 - Logistics: Projected trend in Trasmediterranea passenger numbers and in number of passengers served by Airport Services based on 2006-2008 revenues of the Logistics & Transport Services division.
 - Infrastructure: Concession users estimated from ratio to 2009 infrastructure revenues (only one year's figure is available).
- * CAGR: Compound Annual Growth Rate.

In terms of positive environmental impact

Through renewable energy production, ACCIONA makes a very significant contribution to meeting electricity demand in all the territories where it operates. It aims to provide 4.6% of Spain's electricity demand by 2010; because its output will be renewable and due to its effect of reducing CO₂ emissions, that will represent a saving of 277 million euros in 2010-2013 in Spain's expenditure to purchase emission allowances in order to fulfil the Kyoto protocol. The renewable energy that ACCIONA produces worldwide will save over 6 million metric tons of oil equivalent (toe) in the same period.

Clean energy forecast contribution to energy demand

ACCIONA Spain renewable output (GWh)/Spain's energy demand (GWh)



* Projected emission avoidance (net) based on projected capital expenditure and business plan through 2013. Saving based on average price of CO₂ in 2009 (Source: SENDECO2).

* Electricity generation in Spain based on planned capital expenditure in line with the business plan through 2013.

* TOE: Tonnes of Oil Equivalent.

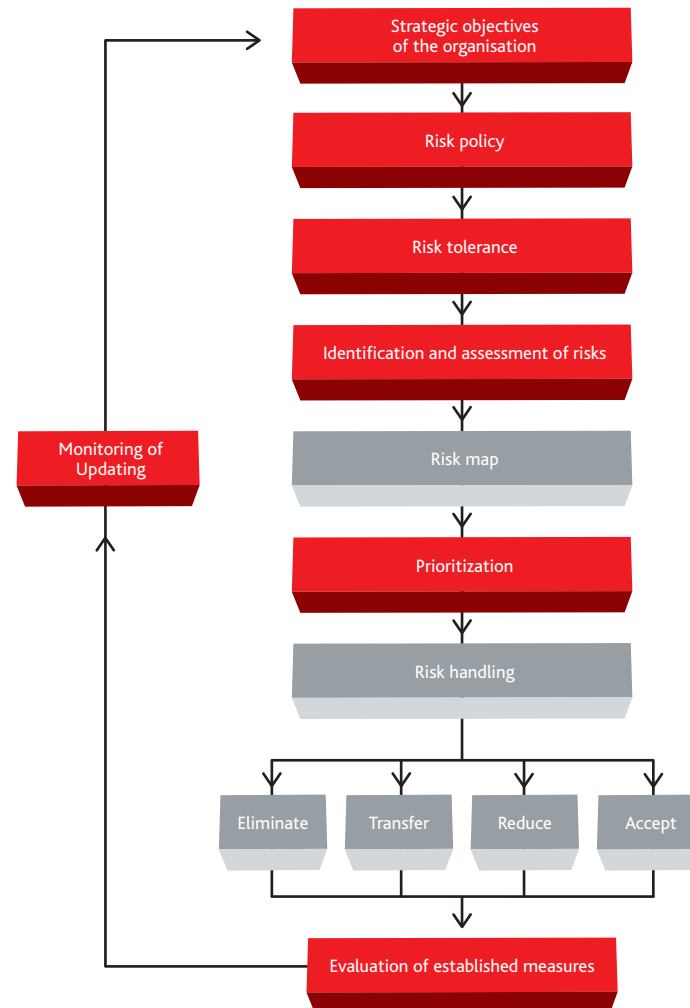
Risk management at ACCIONA

The purpose of ACCIONA's Risk Management Policy is to integrate risk management into the Company's strategy and ensure that risks are properly understood and addressed in order to attain the established objectives.


Risk Management System

ACCIONA's Risk Management System establishes the necessary mechanisms for attaining the Company's objectives within the established levels of tolerance, which also complies with recommendation 49 of the Code of Corporate Governance, on the basis of the following criteria:

- Identification of the risks to attaining the objectives of each business area and of the business as a whole.
- Appraisal and prioritization of each identified risk.
- Response to each risk according to its assessment, establishing an approach to eliminate or minimise the risk profile.
- Information to the members of the organisation about the status and evolution of the risks that have been identified and the related control measures.
- Optimisation of efforts and resources devoted to managing and controlling risks.



Given its presence in different countries worldwide, ACCIONA is exposed to a variety of risks



Types of risks

ACCIONA's main business areas operate in countries with different regulatory, political and social systems, resulting in very varied risks. ACCIONA divides its risks into the following groups:

■ **FINANCIAL RISKS:** Risks that have a direct impact on the Company's bottom line.


■ **STRATEGIC RISKS:** Risks the main impact of which are a reduction of the Company's growth rate due to failure to meet its

strategic objectives and to an inability to respond to a dynamic competitive environment.

■ **OPERATING RISKS:** Risks related to the Company's dependence on specific processes, people or products. These risks generally have an impact on efficacy and efficiency.

■ **UNEXPECTED RISKS:** Risk related to damage to assets and civil liability, which may impair the Company's returns.

The Crisis Management System was optimized in 2009 to deal with and neutralize potentially harmful situations



Main milestones in the year

In 2009, ACCIONA's Board of Directors and its Audit Committee continued to promote Risk Management as a management tool.

The Company's risk map was updated on the basis of probability, economic impact, impact on image, the Company's ability to manage the risk, and the approach established for each risk.

Each business line identifies and assesses its risks in coordination with a corporate-level team, which establishes the acceptable risk tolerance level and coordinates actions to ensure that the risk management approach is coherent with Group policy.

The Crisis Management System was formalized and optimized in 2009 by establishing mechanisms for action in crisis

situations which guarantee a framework for rapid, consistent action to neutralize such situations.

2010-2013 Objectives

In order to standardize risk management approaches at corporate level and attain excellence in risk management, ACCIONA plans to continue improving its Risk Management System along the following lines:

- Extend existing risk maps.
- Extend the scope of the Company's risk maps to other countries.
- Include sustainability as part of risk assessment.
- Re-assess the Company's risk tolerance, i.e. acceptable changes for certain economic variables.
- Optimize and monitor risk management measures.

Sustainability Risks

With the commitment to understand better the risks related to sustainability, the Company is working in two main directions:

- It has identified the risk scenarios related directly or indirectly to social, environmental and corporate governance issues.
- It has included a new risk assessment criterion in its risk management systems - Sustainability and Development - in addition to the existing factors: Probability, Economic Impact, Impact on Image, the

Company's ability to manage risk, and the Approach established for each risk.

This new Sustainability and Development factor refers to such aspects as: lack of ethics and transparency in business, failure to fulfil stakeholders' expectations, and any negative impacts upon local communities.

In this way, the Infrastructure area already uses specific sustainability criteria in its procedures for identifying and assessing risks in its projects.

