

Disclosure Policy

“To provide timely, accurate and balanced disclosure”

Atlantica is committed to provide timely, accurate and balanced disclosure to the public. This Disclosure Policy demonstrates our commitment in our reporting obligations to our shareholders and to the public.

The Disclosure Policy applies to our board of directors, officers and all other employees of Atlantica, or anyone else who speaks on our behalf. It covers disclosures of information, including the quarterly and annual reports and other documents filed with securities regulators, news releases, presentations to shareholders, presentations by senior management and all the information contained on the company’s website. It also includes any other electronic communications, oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media as well as speeches, press conferences and conference calls.

The Disclosure Policy unifies in a single document our existing disclosure, policies and practices. The main purposes of the Disclosure Policy are as follows:

- to document and define key components of Atlantica’s disclosure controls and procedures and set out the standards to which they must be designed, implemented and operated.
- to establish the steps that Atlantica will take when it has information to be released to the public.
- to outline the roles and responsibilities relating to the release of information by individuals or groups at Atlantica, including the Accounting and Disclosure Committee, the Audit Committee and the Board of Directors, to ensure directors, officers, and all employees of Atlantica are aware of our disclosure practices and policies and to provide a hub of expertise on all disclosure related matters.

Atlantica is headquartered and domiciled in the UK and is only listed in the US. As a Foreign Private Issuer (FPI), Atlantica has different reporting requirements than a US domestic issuer.

Our disclosure controls and procedures

Atlantica’s disclosure controls and procedures are designed to provide reasonable assurance that information we are required to disclose under legal and regulatory requirements and stock exchange rules is recorded, processed, summarized, and reported within the relevant time periods.

Our disclosure controls and procedures are also designed to provide reasonable assurance that information is processed and communicated to the Board of Directors and management, including the Chief Executive Officer and the Chief Financial Officer, in a manner that is appropriate to allow timely decisions to be made regarding required disclosure.

Our Board of Directors and the Audit Committee of the Board are also an important part of our disclosure controls and procedures.

Disclosure Committee

The disclosure committee (the "Committee") is responsible in assisting the Board of Directors, the Chief Executive Officer and the Chief Financial Officer in fulfilling their responsibility for overseeing the accuracy and timeliness of the disclosures made by the Company.

The Committee includes certain officers of the Company, including the General Counsel and members of the investor relations (IR) team. The members of the Disclosure Committee include:

- Chief Financial Officer
- General Counsel
- Head of Consolidation and Accounting Policies
- Head of Investor Relations and SEC reporting
- Head of Financial Control
- Head of Internal Audit, as observer

The Committee must be kept fully apprised of all on-going Company developments to evaluate and to discuss those events to determine the appropriateness and timing for public release of the information. If it is determined that material information (see Appendix A for examples of material information) should remain confidential, the Committee will determine how that information will be controlled.

Material information

Information relating to Atlantica is material if there is a substantial likelihood that a reasonable investor would consider the information important in making an investment decision or that disclosure of the omitted information would have been viewed by the reasonable investor as having significantly altered the total mix of information available. As part of a materiality analysis, Atlantica will consider the indicated probability that an event will occur and the anticipated magnitude of the event in light of the totality of company activity. No "single fact or occurrence" is determinative as to materiality, which requires an inherently fact-specific inquiry.

How will Atlantica determine if information is 'material information'?

The General Counsel (or his or her designee) in consultation with at least one other member of the Disclosure Committee, will monitor developments and issues within Atlantica that may necessitate disclosure to the public. If the information is determined to be material, the General Counsel, in consultation with the CFO, will then ensure such information is publicly released in accordance with the procedures outlined in this Disclosure Policy.

As an additional precaution, all employees are asked to quickly alert the General Counsel or Chief Financial Officer if they become aware of a development that may be material if the employee does not believe the development will otherwise be communicated to them.

Releasing material information

In complying with the requirement to disclose all material information under all applicable laws and stock exchange rules, Atlantica will adhere to the following basic disclosure principles:

- Material information will be publicly disclosed immediately via release through SEC filing.
- In certain circumstances, where such determination would not be inconsistent with applicable law, the Disclosure Committee may determine that such disclosure would be unduly detrimental to the Company (for example, if the release of the information would prejudice ongoing negotiations in a transaction), in which case the information will be kept confidential until the Committee determines it is appropriate to publicly disclose.
- Disclosure must include any information the omission of which, would make the rest of the disclosure misleading.
- Unfavorable material information must be disclosed as promptly and completely as favorable material information.
- Disclosure on Atlantica's website alone does not constitute adequate disclosure of material information.
- Disclosure must be corrected immediately if the Company subsequently learns that earlier disclosure contained a material error at the time it was disclosed.
- According to our Management Policies (MP 06 – Investor Relations, Reporting and Communication), an Authorization Request (AR01) must be obtained prior to public disclosure of any corporate presentation, earnings presentation, results presentation, annual report (20-F and UK Annual Report), ESG Report, material event report and any other document containing material information.

When Atlantica releases its financial statements, both quarterly and annually, we follow these best practices:

- We communicate our financial statements to the public on a timely basis. Our financial statements are made available to the public no later than two business

days after they are reviewed by the Audit Committee and approved by the Board of Directors.

- We make available complete financial information, including financial statements, not just a summary.
- We ensure the information is kept confidential until released and then we ensure it is released in a manner that will reach a broad audience.
- We webcast our quarterly results presentation to ensure interested stakeholders can hear the discussion of our results and the presentations by our senior executives.
- We make a complete record available on our website, including the financial statements, management's discussion and analysis, any supplemental financial information, any presentations, and an archive of the results conference call.
- According to our Management Policies, any filing with the SEC or the Companies House in UK, must have prior approval by an Authorization Request. (AR01 – MP06).

When Atlantica releases material information, we follow these best practices:

- We communicate material information to the public on a timely basis. We issue the information through a news release [and 6K/SEC filing] by way of an external full text news service that provides simultaneous North American and/or full international distribution, as needed.
- We ensure the material information is kept confidential until released and then we ensure it is released in a manner that will reach a broad audience.
- Press releases can originate from different departments within the organization, but they must be always reviewed by Investor Relations. Before issuing any press release in any geography, an Authorization Request must be obtained (AR02 – MP06).
- Press releases related to Atlantica's financial statements, both quarterly and annual are reviewed by the Audit Committee and Board of Directors.
- Press releases related to material acquisitions approved by the Board are reviewed by the Board Chair.

Maintaining confidentiality

All Atlantica employees must take appropriate steps to safeguard the confidentiality of information. To prevent the misuse or inadvertent disclosure of confidential material information, the following procedures must be observed at all times:

- Documents and files containing confidential material information should be kept in a safe place, with access restricted to individuals who "need to know" that information in the ordinary course of business.
- Confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes, or taxis.
- Confidential documents should not be read or displayed in public places and should not be discarded where others can retrieve them.
- Atlantica employees must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office.

- Transmission of documents by e-mail should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions by the intended recipient.

Spokespersons

Communications to shareholders, the investment community, regulators, and the media on matters relating to Atlantica is the responsibility of the Chief Executive Officer, Chief Financial Officer and the Head of Investor Relations, who will designate the official spokesperson(s) for the Company.

Atlantica employees may not respond under any circumstances to inquiries from shareholders, the investment community, the media, or others, unless specifically asked to do so by an authorized spokesperson of the Company.

Directors, Officers, and employees of Atlantica should refer inquiries from analysts and institutional investors or from the media to the Head of Investor Relations.

Press releases

Press releases containing earnings guidance and financial results will be reviewed by the Audit Committee and the Board of Directors prior to issuance.

Financial results will be publicly released following:

- approval by the Board of Directors of the Company of the relevant financial statements, narrative reporting and earnings release.
- a press release, and other relevant information, must be furnished to the SEC on Form 6-K.

According to our Management Policies (MP 06), an Authorization Request (AR01) must be obtained prior to public disclosure of any corporate presentation, earnings presentation, results presentation, annual report (20-F and UK Annual Report), ESG Report, material event report and any other document containing material information.

As a general principle, any filing of material non-public information should be made with the market closed.

If the Nasdaq Stock Exchange ("Nasdaq") is open for trading at the time of a proposed announcement, prior notice of a news release announcing material information must be provided to its market surveillance division to enable a trading halt, if deemed necessary by Nasdaq. If a news release announcing material information is issued outside of trading hours, Nasdaq must be notified promptly and in any event before the market reopens.

News releases will be disseminated through an approved news wire services that provides simultaneous national distribution. News releases will be transmitted to Nasdaq and to

relevant regulatory bodies, if considered appropriate by Investor Relations, to major national business wires.

News releases should be posted on the Company's website in a timely fashion after confirmation of dissemination over the news wires.

Conference Calls

Conference calls may be conducted for quarterly earnings and major announcements but should be accessible simultaneously to interested parties, as some of the participants may choose to join by telephone, others in a listen-only mode by telephone or via a webcast over the Internet. The call should be preceded by a news release containing all relevant material information. According to our Management Policies, before issuing any news release an Authorization Request must be obtained (AR02 – MP06).

In appropriate circumstances, at the beginning of the call, a Company spokesperson will provide appropriate cautionary language regarding any forward-looking information and direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties applicable to the news.

The Company will provide advance notice of any conference call and/or webcast by issuing a news release announcing the date, time and topic and providing information on how interested parties may access the call and webcast. These details will be provided on the Company's website. In addition, the Company may send invitations to analysts, institutional investors, the media, and others. Any supplemental information provided to participants should also be posted to the website for others to view.

An audio recording and/or text transcript of each conference call will be made available on the Company's website.

Conference calls are not intended to be used to announce material information. Any such announcement should be made by a press release prior to any conference call.

Rumours

The Company's policy is to not comment, affirmatively or negatively, on rumours. This also applies to rumours circulating on the Internet. Spokespersons for the Company should respond consistently to any rumours, by saying, "It is our policy not to comment on market rumours or speculation."

Should a regulator or a stock exchange request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in the Company's securities, the Disclosure Committee will consider the matter and decide whether or not to make a Policy exception. If the rumour is true in whole or in part, this may

be evidence of a leak, and the Committee will consider whether a news release should be issued disclosing relevant information.

Contact with Analysts and Investors on an individual or a small group basis

Atlantica views meetings on an individual or small-group basis with analysts and significant investors as an important element of Atlantica's investor relations program and in keeping with current industry practices. Only spokespersons or those designated by them may meet with analysts and investors on an individual or small group basis whether on the telephone or in person and such spokespersons will provide only public or non-material information in such meetings.

These meetings will be conducted in accordance with the company's guidelines for conducting such meetings, including that the Chief Financial Officer or the Head of Investor Relations (or his or her delegate(s)) must be present at all such meetings.

Atlantica will, through its website or otherwise, provide comparable, non-material information related to the business and affairs of Atlantica to individual investors or to the media that it has provided to analysts and institutional investors and which is expected to be of interest to investors or shareholders. The Head of Investor Relations will keep a record of all contacts with investors and will be responsible for considering the discussions at such meetings to confirm that no disclosure of previously undisclosed material information has occurred (and to take action in accordance with this Disclosure Policy if it has).

If the Company intends to announce material information at an analyst or Shareholder meeting or a press conference or conference call, the announcement must be preceded by a news release furnished on Form 6-K.

The Company should provide only non-material information through individual and group meetings. The Company should not alter the materiality of information by breaking down the information into smaller, non-material components.

The Company will provide the same sort of detailed, non-material information to individual investors or reporters that it has provided to analysts and institutional investors and may post this information on its website.

If the materials used in a conference are not publicly available, an Authorization Request must be obtained to approve the materials (AR02 – MP06).

Whenever feasible, more than one Company representative will be present at all individual and group meetings.

Forward looking information

Atlantica may be required or may choose to disclose forward-looking information from time to time to provide the public with management's opinion of possible events, conditions and results of operations. This disclosure will be made in compliance with legal and regulatory requirements and stock exchange rules and best practices including the guidelines under this Disclosure Policy.

- The disclosure must be reviewed by the Company's external legal counsel.
- There must be a reasonable basis for making the forward-looking disclosure, taking into consideration the assumptions underlying the information and the process followed in preparing it.
- It must also clearly be identified as forward-looking by words such as "expect", "anticipate" or "may".
- Forward-looking information that contains "financial information" must be previously reviewed by the Audit Committee and approved by the Board of Directors.
- Forward-looking information that constitutes "material information" must be broadly disseminated in accordance with the Disclosure Policy.
- Such disclosure, whether in writing or oral, should be accompanied by appropriate cautionary language that identifies any material risk factors or uncertainties that could cause actual results to differ materially and a description of any material assumptions on which the information is based.
- The information will be accompanied by a statement that the information is stated as of the current date and subject to change after that date, and the Company disclaims any intention not to update or revise this statement of forward-looking information, except as may be required by applicable law.

Periodic disclosure documents

In accordance with legal and regulatory requirements and stock exchange rules, we provide periodic disclosure documents to our shareholders and regulators. These documents include a variety of information regarding Atlantica and its business, such as its corporate governance, financial condition and prospects, and director and executive compensation.

Disclosure controls and procedures for the preparation, review and approval of such documents are designed to provide reasonable assurance that the information required to be disclosed is being recorded, processed, summarized, and reported as and when required. These controls and procedures are established by each department responsible for the disclosure document (or a portion of it) and include:

- determining, and providing written communication of, the deadlines for filing the document and the other legal disclosure requirements associated with the document.

- assigning key roles, responsibilities and authorizations to employees who have the appropriate level of knowledge, skill, information and authority to carry them out in relation to the document.
- guiding authorized employees on how to assess and document the materiality of information or events for disclosure purposes in accordance with the Disclosure Policy and applicable requirements and standards.
- requiring appropriate supporting materials for information included in the document.
- review of the disclosures by external legal counsel.
- review of the disclosures in reference to financial statements by external auditor.
- obtaining review and/or approval of the document by the Board of Directors or a Committee of the Board, the Disclosure Committee and/or the diligence session in support of quarterly certification to our regulators, in accordance with their respective mandates, task lists and practices.
- ensuring controls and procedures are monitored and any issues are promptly reported to the appropriate level of management for evaluation and action, including the Disclosure Committee if any potentially significant weakness is found that could materially affect the information.
- the timeliness, reliability, and accuracy of disclosure.
- ensuring controls and procedures are modified to adapt to any changes in the business, environment, or applicable requirements.
- obtaining approval according to our Management Policies (AR 01/02 MP 06), prior to public disclosure of any document containing material information.

Quiet Periods

To avoid the potential for selective disclosure or even the perception or appearance of selective disclosure, the Company will observe quiet periods prior to quarterly earnings announcements or when material changes are pending. Regular quiet periods will commence 14 days following each quarter end expiring upon the public release of the earnings for the quarter.

During a quiet period, neither the Company nor the officers will initiate any meetings or telephone contacts with analysts and investors but will respond to unsolicited inquiries concerning factual matters. If the Company is invited to participate, during a quiet period, in investment meetings or conferences organized by others, the officers will determine, on a case-by-case basis, if it is advisable to accept these invitations. If accepted, extreme caution will be exercised to avoid selective disclosure of any material, non-public information. No comments concerning the period just ended, nor any comments referencing past or present guidance, are permitted during the quiet period.

Inadvertent Disclosure

If there is reason to believe that a breach of this Disclosure Policy might have occurred resulting in the release of material information to a select group or individual, such breach

shall immediately be reported to the General Counsel or, in his or her absence, the Chief Financial Officer or the Head of Investor Relations, and Atlantica shall make immediate public disclosure of that information as soon as is reasonably possible. Parties in receipt of undisclosed material information will be advised that such information is material and has not yet been publicly disclosed.

Analyst Reports

Upon request, the Company may review analysts' financial models for factual accuracy and completeness based on publicly disclosed information. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with the analyst's financial model and earnings estimates.

To avoid appearing to endorse an analyst's report or model, a Company spokesperson (the Chief Financial Officer or the Head of Investor Relations) will provide comments orally to indicate the report was reviewed only for factual accuracy.

Analyst reports are proprietary products of the analyst's firm. Distributing or referring to analyst reports, or providing links to them, may be viewed as an endorsement by the Company of the reports. For these reasons, the Company will not provide analyst reports through any means to persons outside of the Company or generally to company personnel, including posting such reports on its website. Analyst reports may, however, be provided to the directors, officers, and senior management of the Company and to the Company's financial and professional advisors. The Company may post on its website a complete listing regardless of the recommendations, of all the investment firms and analysts who provide research coverage on the Company. If provided, this list will not include links to the analysts' or any other third-party websites or publications.

Corrections to previously released material information

Disclosure must be corrected immediately if Atlantica subsequently learns that previous disclosure by Atlantica contained a material error at the time it was given and the correction would constitute material information. The General Counsel shall, in consultation with the Head of Investor Relations and the Chief Financial Officer, ensure that a news release is issued immediately to correct the error and that appropriate notifications are made to the exchanges upon which Atlantica's shares trade so that a halt to trading may be instituted if necessary. The Board of Directors will be notified of any such situations.

Other communications: website, social media and external presentations

The Investor Relations department is responsible for all Atlantica's external communications.

Website

The Company has a website: www.atlantica.com. The Company website is designated to provide an overview of the Company to any stakeholder in search of general information

and specific updates on the Company, mainly targeting the investor and analyst communities. An Authorization Request (AR02 – MP06) must be obtained to approve the documentation to be uploaded to the website.

The creation of any new websites related to Atlantica’s assets or subsidiaries, must be previously discussed and approved by Investor Relations. The structure, sections and contents are subject to prior approval (AR02 – MP06)

Social media

According to our Management Policies, employees are advised to be discrete and prudent whenever making reference to Atlantica on any social media. These include: LinkedIn, Facebook, Twitter, Instagram, etc.

Employees are prohibited from participating in discussions in internet chat rooms or social media on matters pertaining to Atlantica’s activities or its securities.

If employees encounter a discussion or posting on electronic media pertaining to the company that they think is significant or troubling, they are to advise the Head of Investor Relations.

External Presentations

Invitations to give external speeches or other presentations relating to the company’s business or operations at conferences or other public venues must be pre-approved by Investor Relations and Chief Financial Officer before acceptance. The presentation must be based on public information and be prepared and approved in accordance with the protocols of this Policy beforehand. The contents are subject to prior approval (AR02 – MP06)

Communication and enforcement

A copy of this Policy will be available to all Company employees. Changes will be communicated to all Company personnel on a timely basis after the change is effective.

Any employee of the Company who violates this Disclosure Policy may face disciplinary action up to and including termination of employment without notice. The violation of this Policy may also violate certain securities laws, which could expose the directors, officers or employees to personal liability. If it appears that an employee may have violated such securities laws, the Company may refer the matter to the appropriate regulatory authorities, which could lead to fines or other penalties.

Responsibility

The Disclosure Committee will monitor the Disclosure Policy in conjunction with regulatory guidance, best practices and experience and make recommendations to the Audit

Committee at least annually. The Disclosure Committee will also report to the Chief Executive Officer and the Audit Committee on the Disclosure Policy, the design and operation of related disclosure controls and procedures, and any disclosure issues that may arise.

Contact information

If you are concerned about a possible breach of the Disclosure Policy in respect of material information about Atlantica, contact any one of the following:

- compliance@atlantica.com
- Irene Hernandez, General Counsel
- Francisco Martinez Davis, CFO
- Leire Perez, Head of Investor Relations and SEC reporting

Appendix A: Examples of Potentially Material Information

The following are examples of the types of events or information which may be material. This list is not exhaustive and is not a substitute for the company's judgment in making materiality determinations.

Changes in Corporate Structure

- changes in share ownership that may affect control of the company
- major reorganizations, amalgamations, or mergers
- take-over bids, issuer bids, or insider bids

Changes in Capital Structure

- the public or private sale of additional securities
- planned repurchases or redemptions of securities
- planned splits of common shares or offerings of warrants or rights to buy shares
- any share consolidation, share exchange, or stock dividend
- changes in a company's dividend payments or policies
- the possible initiation of a proxy fight
- material modifications to rights of security holders

Acquisitions and Dispositions

- significant acquisitions or dispositions of assets, property, or joint venture interests
- acquisitions of other companies, including a take-over bid for, or merger with, another company

Changes in Credit Arrangements

- the borrowing or lending of a significant amount of money
- any significant mortgaging or encumbering of the company's assets
- significant defaults under debt obligations, agreements to restructure debt, or planned enforcement procedures by a bank or any other creditors
- significant changes in rating agency decisions
- significant new credit arrangements

Changes in Financial Results

- a significant increase or decrease in near-term earnings prospects
- unexpected significant changes in the financial results for any periods
- significant shifts in financial circumstances, such as cash flow reductions, major asset write-offs or write-downs
- significant changes in the value or composition of the company's assets
- any material change in the company's accounting policies
- any outage in a relevant asset with a material adverse effect on financial statements

Changes in Business and Operations

- any development that significantly affects the company's resources, technology, products, or markets

- a significant change in capital investment plans or corporate objectives
- major labour disputes or disputes with major contractors or suppliers
- significant new contracts, products, patents, or services or significant losses of contracts or business
- significant discoveries by resource companies
- changes to the board of directors or executive management, including the departure of the company's CEO, CFO, or president (or persons in equivalent positions)
- the commencement of, or developments in, material legal proceedings or regulatory matters
- waivers of corporate ethics and conduct rules for officers, directors, and other key employees
- any notice that reliance on a prior audit is no longer permissible
- de-listing of the company's securities or their movement from one quotation system or exchange to another