

Summary of Insider Trading Policy

1. Applicability

The Insider Trading Policy of Atlantica Sustainable Infrastructure Plc (together with its subsidiaries, "**Atlantica**" or the "**Company**") applies to any and all trading or other transactions in securities, including ordinary shares, common stock, options and any other securities, such as preferred stock, notes, bonds and convertible securities, as well as to derivative securities relating to any of the Company's securities, whether or not issued by Atlantica.

This Policy applies to all (i) directors of the Company, (ii) executive officers of the Company, (iii) employees of the Company listed on the Key Covered Persons register, (iv) their respective related persons ((i) through (iv) collectively, the "**Key Covered Persons**") and (v) all employees of the Company and their respective Related Persons (together with the Key Covered Persons, the "**Covered Persons**").

2. No Trading or Causing Trading While in Possession of Material Non-public Information

No Covered Persons may purchase or sell, or offer to purchase or sell or otherwise trade any security of the Company, whether or not issued by the Company, while in possession of material non-public information about the Company.

No Covered Persons may communicate any material non-public information about the Company to any other person, including family members and friends, or otherwise disclose such information without the Company's authorization.

No Covered Persons may purchase or sell any security of any other company, whether or not issued by the Company, while in possession of material non-public information about that company that was obtained in the course of his/her involvement with the Company.

For compliance purposes, no Covered Person should never trade, tip or recommend securities (or otherwise cause the purchase or sale of securities) while in possession of information that have reason to believe is material and non-public.

3. Blackout Periods

All Key Covered Persons are prohibited from trading in the Company's securities during the period beginning at the close of the market on the first calendar day immediately following each fiscal quarter and ending at the close of business on the second full Trading Day after the Company's financial results are publicly disclosed.

While other types of material non-public information regarding Atlantica (such as negotiation of mergers, acquisitions or dispositions or new product developments) may be pending and not be publicly disclosed, the Company may impose special blackout



periods during which Key Covered Persons are prohibited from trading in the Company's securities.

These trading restrictions do not apply to employee stock purchase plan resulting from periodic payroll contributions to the plan under an election made at the time of enrollment in the plan.

4. Prohibited Transactions

Covered Persons are prohibited from engaging in the following transactions in the Company's securities:

- a) Short sales: Covered Persons may not engage in short sales of the Company's securities. A short sale is the sale of a security that the seller does not own at the time of the trade.
- b) Options trading: Covered Persons may not buy or sell puts or calls or warrants, or other derivative securities on the Company's securities.
- c) Hedging: Covered Persons may not enter into hedging or monetization transactions or similar arrangements with respect to Company securities.
- d) Pledging: Covered Persons may not enter into transactions or similar arrangements that will cause them to pledge Company securities, including holding the Company securities in a margin account or otherwise pledging the Company securities as a collateral for a loan.