



Communication policy and  
contacts with shareholders,  
institutional investors and proxy  
advisors

DECEMBER 2020

## 1. Control of revisions

Date Prepared	Date of approval	Version no.	Description of modifications
15/09/2019	15/09/2019	1	Initial version
10/12/2020	15/12/2020	1	Modified

## 2. Purpose of the Standard

The Board of Directors of Greenergy S.A. ("GREENERGY" or the "Company"), which is legally vested with the non-delegable power to determine the general policies and strategies of the Company, recognises as a strategic objective, the permanent focus on the transparency of information and relations with its shareholders and with professional or qualified investors in equities, fixed income and socially responsible investment (the "Institutional Investors"), as well as with proxy advisors, which are governed by the provisions of law and the corporate governance rules of the Company and, in particular, by the principles set forth in this Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors, which sets forth the procedures for financial, non-financial and corporate information, through the channels described below, so as to help maximise the dissemination and quality of the information.

## 3. General principles of communication policy and contacts with shareholders, institutional investors and proxy advisors

The Board of Directors is responsible for managing and supervising the information provided to shareholders, Institutional Investors, proxy advisors and the markets in general. In order to enhance communication and transparency with its shareholders and investors, both domestic and foreign, in their involvement with the Company, the Board of Directors approves the following policy governed by the following general principles:

- Transparency, truthfulness, immediacy, equality and symmetry in the dissemination of information.
- Protection of the legitimate rights and interests of all shareholders and equal treatment in the recognition and exercise of the rights of all shareholders who are on an equal footing and are not affected by conflicts of competence or interest.
- Collaboration with shareholders to ensure that information and market relations practices are transparent, effective and in line with the Company's corporate interest.

- Compliance with the provisions of the applicable regulations and the Company's internal corporate governance rules, as well as with the principles of cooperation and transparency with the authorities, regulatory bodies and competent administrations.

The principles set out above apply to the Company's information and communications with shareholders, Institutional Investors and other interested parties, such as financial institutions, managers and custodians of the Company's shares, financial analysts, regulatory and supervisory bodies, rating agencies, information agencies, proxy advisors, etc.

#### 4. Internal procedure for the dissemination of information

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In order to ensure that the dissemination of news that may contain inside information or other information relevant to shareholders, institutional investors and the market in general takes place under conditions of transparency, symmetry and in accordance with the provisions of the general principles of this policy, the Company has established the following internal coordination rules:

- I. In the event that inside information generated in the Company is likely to be classified as material, in the event that there is any doubt as to the obligation to report it to the CNThV, the Secretary of the Board, in coordination with the Investor Relations Director and the Regulatory Compliance Unit, shall be responsible for determining the need to send a communication of information to the CNThV.
- II. When the information is not considered relevant from the point of view of securities market regulations or when it is not required to be disclosed pursuant to a legal obligation, the Company may disclose such information if it deems it appropriate in accordance with the principles set forth in this Policy. In this regard, such information may be communicated to shareholders and the markets by any means that respects this Policy.

For these purposes, the Investor Relations and Communications Department shall be responsible for publishing the information referred to in this section.

#### 5. General information and communication channels

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In order to comply with the following policy, the Company has various communication channels for the dissemination of information to the general public.

##### **Website of the Comisión Nacional del Mercado de Valores (CNMV) and other official bodies.**

Inside information or other information relevant to the securities market, as well as other information required by the applicable legislation, will be made public through the CNThV's website by means of the communication of Significant Events. The

The content of this information shall be clear, truthful and complete, and shall not be misleading.

In addition, the Company will disseminate information through other channels established by other applicable national and, where appropriate, foreign supervisory authorities and bodies.

#### **Greenergy corporate website.**

Greenergy's corporate website ([www.greenergy.eu](http://www.greenergy.eu)) is the Company's main official communication channel with shareholders, Institutional Investors, proxy advisors and the markets in general, and is constantly updated.

The Company publishes in the "Investors" section of the main menu of its corporate website all legally required information, as well as all communications of Inside Information or other relevant information made to the CNThV and other official bodies.

It will also publish additional information it deems appropriate or relevant in order to promote greater transparency vis-à-vis its shareholders, institutional investors and the market in general and to facilitate shareholders' right to attend, be informed and participate in the General Meeting. Thus, you can find economic and financial information on the Company, information on general meetings and corporate governance and other relevant information.

#### **Investor Relations and Communications Department.**

Greenergy has an Investor Relations and Communication department, which is a global function responsible for coordinating, analysing and managing relations and contacts with shareholders and investors, and is therefore the natural channel of communication and dialogue between Greenergy, its shareholders and investors, proxy advisors and the market in general on a permanent basis.

In this function, the Investor Relations and Communications department will coordinate the communication of the various subsidiaries with the market to ensure that it is appropriate, consistent and coherent at all times.

The Investor Relations and Communications Department shall, when deemed necessary, have the collaboration of such persons in the organisation as may be necessary or convenient to facilitate communication and meet the information requirements raised at any given time.

The Investor Relations and Communications department, in the development of its function, will obtain the necessary information for its communication to the market from the different corporate and business divisions, which will ensure the consistency and homogeneity of the information.

The Investor Relations and Communications Department is responsible for dealing with enquiries from analysts and Institutional Investors on a permanent and individual basis, for which purpose it has an e-mail address ([inversores@greenergy.eu](mailto:inversores@greenergy.eu)).

The Company organises briefings on the Company's and the Group's performance or other matters of interest to analysts and Institutional Investors, in order for them to

have adequate information on the Company. This is without prejudice to the Company's strict observance of the principle of equal treatment of all shareholders who are in identical conditions and who are not affected by conflicts of competence or interest.

### **Social Networking**

Aware of the impact of new information technologies and Internet communication channels, the Company promotes an active presence in social networks (such as Twitter, LinkedIn, or YouTube) in which, without prejudice or detriment to compliance with its legal obligations, it seeks to disseminate information of interest on the company's progress and activities and to establish a fluid and profitable dialogue with shareholders and other stakeholders who use these media on a recurring basis to find out about matters of interest.

In the dissemination of Inside Information on social media, the Company shall ensure that any dissemination is governed by the following basic parameters:

- Completeness and clarity: the information disseminated must be complete, objective and clear, without requiring recourse to sources additional to the original message to be fully understood. In addition, the indication "Inside Information" must be clearly marked and separated from any marketing communication.
- Global access: should be replicated through a widely distributed social network and from accounts with a large following.
- Interactivity: social networks may not be used to include extensions or nuances to the original information sent to CNThV, which alter its meaning or scope, as part of the communicator's or sender's responses in the information medium or channel.

The Company also endeavours to ensure that the proceedings of the General Shareholders' Meetings are publicised, in whole or in part, through social networks, for which purpose it may publish the main headlines of the event on the network in real time, upload photos and/or videos of the live event to Company channels and share the presentations on a web page on the Internet.

Without prejudice to the foregoing, Grenergy employees must request the relevant authorisations from the Communication and Investor Relations department to speak to the media and social networks, publish and share opinions, participate in professional conferences or seminars, and in any other situation that may have a public dissemination, provided that they participate in their capacity as company employees. Likewise, statements must be made in a responsible, respectful and accurate manner, following the guidelines established by Investor Relations and Communication and respecting the confidentiality of the information of the Company and its clients.

### **The media**

In order to facilitate open and transparent communication with the media, Grenergy has a dedicated Investor Relations Department through

which channels journalists' requests or questions about the company's development and business, as well as the corresponding answers.

Greenergy provides the press with an electronic mailbox ([comunicacion@greenergy.eu](mailto:comunicacion@greenergy.eu)). The various press releases and materials published by the company to facilitate the work of the media can be found on its corporate website <https://greenergy.eu/prensa/>.

## **6. Policy Monitoring**

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The Audit and Compliance Committee, reporting to the Board of Directors, is responsible for periodically supervising the content, application and development of this Policy, with the support of the Compliance Unit and the Investor Relations Department.

The implementation of this Policy is monitored by the Investor Relations Department.

## **7. Public nature of the Standard**

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This Policy is of a public nature and will be permanently hosted on Greenergy's website, as well as its subsequent modifications.

## **8. Approval of the Policy by the Governing Board**

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In its supervisory duty, the Board of Directors of Greenergy, S.A. signs and approves this Policy and assumes the responsibility derived from it.

The Policy has been signed and approved on 15 December 2020.