



CIE Automotive


Policy on Information, Communication, and Contacts
for Shareholders, Markets, and Other Stakeholders

 CIE Automotive	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	2 of 7

Contents

1. General principles	3
2. General channels for information, communication, and contacts	4
3. Specific channels for information and for communication with the Company’s representatives.....	5
4. Communication with other stakeholders	6
5. Internal coordination for releasing news that could contain inside information or other price-sensitive or regulated information.....	7
6. Control, oversight, and distribution of the Policy	7

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
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 CIE Automotive	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	3 of 7

The Board of Directors (“**Board**”) of CIE Automotive, S.A. (“**CIE Automotive**”, the “**Company**”, or the “**Group**”, used in this document without differentiation) recognises that maintaining an ongoing focus on transparency is a strategic objective, with regard to the information given to the shareholders, the institutional and retail investors, the markets, and all other stakeholders (including proxy advisors), and with regard to the relations maintained with all these groups. That transparency will be governed in general by the applicable legislation and by the Company’s corporate governance rules, and in particular by the principles established in this Policy on Information, Communication, and Contacts for Shareholders, Markets, and Other Stakeholders (the “**Policy**”).

1. General principles

The Company’s Board has the highest level of authority to manage and oversee the information provided to the shareholders and institutional and retail investors, to the markets in general, and to the rest of the stakeholders. It must therefore implement appropriate measures to ensure that all those stakeholders can exercise their rights, while also defending the corporate interests, all in conformity with the following principles:

- ✓ Distribution of information in a transparent, unambiguous, truthful, standardised, and simultaneous manner that will allow the recipients to assess the Company’s management and financial position.
- ✓ Development of a communication strategy for economic and financial information, non-financial information, and corporate information. That strategy must contribute to optimising the distribution and quality of the information made available to the shareholders and institutional investors, to the markets, and to the rest of the stakeholders, while at all times complying with the legislation on market abuse.
- ✓ Equal treatment with regard to recognition and exercise of the rights of all shareholders that are subject to the same conditions and not affected by conflicts of interest.
- ✓ Protection of the legitimate rights and interests of all shareholders, giving them appropriate channels for exercising their right to information.
- ✓ Continual and ongoing provision of information to the shareholders (i.e., not only with the notice of meeting for the General Shareholders’ Meetings), and for this purpose, the Board must ensure that effective channels are made available to facilitate communications with the shareholders, so that they are continually informed about any existing proposals regarding the Company’s management, in accordance with the law and with the Company’s corporate governance rules.
- ✓ Collaboration with the shareholders to ensure that the practices in place for distributing information, and for relations with the markets and with the rest of the stakeholders, are transparent, effective, and in line with the corporate interests.
- ✓ Development of information instruments and communication channels that make use of new technologies, to improve relations with the shareholders and institutional and retail investors, the markets, and all other stakeholders.
- ✓ Full and timely compliance with the law and with the Company’s corporate governance rules, and with the principles of cooperation and transparency with interacting with the competent governmental authorities and regulatory bodies.

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
---	--	-------------------------------

 CIE Automotive	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	4 of 7

These principles will apply to the information and to the Company's relationships with the shareholders, with the markets, and with all other stakeholders, such as proxy advisors, financial intermediaries, managers and depositories of the Company's shares, financial analysts, regulatory and supervisory bodies, credit rating agencies, and reporting agencies, among others.

While still complying with the principles of equal treatment, non-discrimination, and information symmetry, the Company may adapt the information instruments, communication channels, and the rest of the initiatives on the subject of information and communication with the shareholders and institutional and retail investors, markets, and all other stakeholders on the basis of the groups that will be receiving the information.

With regard to regulatory compliance, special emphasis must be placed on the rules regarding market abuse, particularly those relating to the handling of inside information and other price-sensitive or regulated information, as contained in the applicable laws or in the Company's corporate governance rules.

2. General channels for information, communication, and contacts

The primary general channels that the Company will use for information and communication are the following:

2.1. The websites of the Spanish National Securities Market Commission and other bodies

The Company's first general channel for information and communication with the shareholders and institutional and retail investors, the markets, and the other stakeholders is the website of the Spanish National Securities Market Commission ("**CNMV**"), as well as, where applicable, the channels established by authorities and supervisory bodies in other countries. These channels are characterised by their public nature and ability to immediately post the reporting sent to those institutions on their websites, regarding inside or price-sensitive information or other regulated information, with that information also simultaneously made available at the Company's corporate website.

2.2. Corporate website

In addition to the CNMV's website, the Company's other essential, official channel for information and communication with shareholders and institutional and retail investors, the markets, and the rest of its stakeholders is its own corporate website (www.cieautomotive.com). That website has a specific "Shareholders & Investors" section that is continually updated. This channel is prioritised information can be posted immediately, with ongoing access thereafter, with the aim of ensuring that transparency is the prioritised value that underlies the Company's relations with its shareholders and institutional and retail investors, the markets, and all other stakeholders.

To respond to requests for information received from foreign shareholders and institutional and retail investors, the information that the Company makes available at its corporate website is posted simultaneously in Spanish and English whenever possible, with the understanding that the Spanish version will prevail in any case where discrepancies exist between those versions.

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
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	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	5 of 7

Also, in cases where the Company voluntarily publishes its quarterly management statements, and also for its twice-yearly and annual financial reports, any other institutional submissions, and notices of inside or price-relevant information or any other regulated information in general, these are systematically posted at the corporate website simultaneously with their appearance on the CNMV's website.

In addition, the Company provides direct access at its own website, for a reasonable period of time, to recordings of the conferences where its results were presented.

After being sent to the CNMV, the Company's economic/financial, non-financial, and corporate information will be distributed to financial analysts, investors, the media, and reporting agencies, in cases where mandatory.

In addition, on its corporate web page the Company maintains a continually updated calendar, specifying the dates when its results will be published and when dividends will be distributed, along with announcements of meetings with shareholders, analysts, and investors, with sufficient advance notice and including their scheduled forum, location, and date.

2.3. Social networks

The Company is aware of the repercussions that new technologies are having on Internet-based information and communication channels, and it will therefore maintain an active presence on social networks such as LinkedIn ([link](#)), among others. On those social networks, and while still fully complying with its legal obligations, it will make an effort to distribute information of interest about the operations and activities of the Company and its Group, and allowing its representatives to maintain a productive ongoing dialogue.

3. Specific channels for information and for communication with the Company's representatives

While still fully maintaining the Company's general information and communication channels, CIE Automotive also has specific information and communication channels that allow it to maximise the distribution and quality of the information it makes available to the shareholders and institutional investors, to the market, and to the rest of the stakeholders, while always complying with the principles established in this Policy.


3.1. General Shareholders' Meeting

The Company's Board has taken on a commitment to encourage informed and responsible shareholder participation at the General Shareholders' Meetings, and it will implement all appropriate measures to make it possible for the corresponding functions to be effectively exercised at the General Shareholders' Meetings, in compliance with the law and the Company's corporate governance rules.

When a notice of meeting is issued for a General Shareholders' Meeting, the Company may use the services of intermediaries to improve distribution of the information to its shareholders and investors, and the Company's Shareholder and Investor Relations Department may adapt the means and instruments made available for proxy voting and remote voting to fit the characteristics of the shareholders and institutional and retail investors.

The intermediaries must notify the shareholders regarding the rights they may exercise, and will be responsible for ensuring that any instructions they forward to the Company on behalf of their

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
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 CIE Automotive	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	6 of 7

clients are valid and coincide faithfully with those they have received from the shareholders of the shares deposited or their representatives.

In addition, from the time when the notice of meeting is published and at least until the end of the corresponding General Shareholders' Meeting, the Company must keep the information required by law and by the Company's corporate governance rules available at its corporate website without interruption.

3.2. Information meetings

To ensure that the shareholders, institutional and retail investors, analysts, proxy advisors, and other stakeholders always have access to adequate, up-to-date information about the Company, CIE Automotive may organise information meetings regarding the operations of the Company and Group and other aspects of interest. All this must be understood as without prejudice to the Company's strict compliance with the principle of equal treatment for all shareholders that are subject to the same conditions and that are not affected by conflicts of interest.

3.3. Relations with the shareholders and institutional investors

The Shareholder and Investor Relations Department is responsible for ongoing, individualised management of information queries and requests received from the shareholders, institutional and retail investors, and analysts. For this purpose, CIE Automotive provides them with a telephone number, fax number, postal address, and email address at the Company's corporate website.

3.4. Investor agenda

At its corporate website, CIE Automotive must provide information in a special "Investor Agenda" section, regarding the Company's initiatives involving the shareholders, institutional and retail investors, and other stakeholders (such as the dates of events from previous years and relevant future events). It may also make available documents and presentations of interest for the participants in those forums or events.

3.5. Internal reporting channel

The Company provides an Ethics Channel at its corporate website, which all persons associated with the Group and all stakeholders can use to report any irregularities, unethical or unprofessional conduct, or infringements of the rules established in the Code of Professional Conduct. All reporting received via that channel is managed in a confidential manner.

Reports can be submitted using the channels and procedures established in CIE Automotive's Ethics Channel Rules.

4. Communication with other stakeholders

While still fully maintaining the Company's information and communication channels described in this Policy, CIE Automotive may also establish specific information and communication channels for other stakeholders such as its clients and employees, governmental and regulatory bodies, suppliers and collaborators, intermediaries, financial institutions, NGOs, proxy advisors, foundations, and local communities, in a manner that ensures direct, transparent, and fluid communication with all of them and allows their needs and expectations to be identified.

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
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	POLICY ON INFORMATION, COMMUNICATION, AND CONTACTS FOR SHAREHOLDERS, MARKETS, AND OTHER STAKEHOLDERS	Code:	CIE CO CE PO 01
		Version:	04
		Page:	7 of 7

5. Internal coordination for releasing news that could contain inside information or other price-sensitive or regulated information

The following internal coordination rules have been established to ensure that whenever information that could be considered as inside, price-sensitive, or regulated information is distributed to the market, it is done under conditions of transparency and symmetry, and in compliance with the law and the Company's corporate governance rules:

- ✓ If any information the Company generates for the market could be considered as inside, price-sensitive, or regulated information, or if there are any uncertainties regarding the obligation to send it to the CNMV in accordance with the law and the Company's corporate governance rules, the Company's General Secretary will be responsible for determining whether that information must be sent to the CNMV in advance, and if so, that information must be drafted, reviewed, and sent through the authorised representatives that the Company has designated for that purpose.
- ✓ Any inside, price-sensitive, or regulated information that must be sent to the CNMV must be sent by the person designated for that purpose. The Company must designate one or more authorised persons to respond to any questions the CNMV has regarding inside, price-sensitive, or regulated information.
- ✓ All such information must be sent to the CNMV prior to or simultaneous with its distribution by any other means, with due consistency maintained among the various communications performed, and in all cases in compliance with the time periods, means, and channels specified for that purpose in the applicable market abuse legislation.
- ✓ As an exception to the above, information that the Company generates by any means in the context of general discussions and conversations between the Company's senior managers and its shareholders, institutional investors, analysts, and other stakeholders, regarding evolution of the Company and the markets, may be communicated to the shareholders, institutional and retail investors, markets, and other stakeholders, but always in full compliance with the applicable market abuse legislation.

6. Control, oversight, and distribution of the Policy

Application of this Policy is subject to periodic review by the Audit and Compliance Committee, in conformity with the Rules for the Company's Board and the Rules for that Board's Audit and Compliance Committee.

However, the Company's Board is periodically informed regarding application of this Policy and regarding the primary relations that the Company is maintaining and will be maintaining with shareholders, investors, analysts, and other stakeholders.

This Policy must remain posted at the Company's corporate website at all times.

Issued and reviewed: Audit and Compliance Committee	Approved: Board of Directors	Date: February 2024
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