

The Executive Committee of OBRASCON HUARTE LAIN, S.A. (OHLA), following the recommendations set forth on the Good Governance Code for listed companies, and within the framework of its general and non-delegable competence to determine the Company's general policies and strategies, including information and communication with Shareholders, the financial market, and public opinion, has approved at its Meeting held on 20 January 2022 the "Policy for communication and contact with shareholders, potential and current investors, intermediaries, regulators, rating agencies, and other market players" (hereinafter the "Policy"). The Policy was approved pursuant to a favorable report issued by the Appointments and Remuneration Committee.

The Company's Executive Committee, acknowledging the importance of communication with Shareholders and institutional investors (fixed and variable income), minority shareholders, intermediaries, regulators, rating agencies, and other stakeholders, strives to promote transparency in the information that the Company provides and establishes the principles and mechanisms for this purpose. It seeks to promote the Company's visibility and advocates for correct and homogeneous information in the market and its proper treatment and interpretation.

DESCRIPTION

OHLA prioritizes the dissemination of financial and non-financial information through its corporate communication channels: the Corporate Intranet, website, the Group's profiles on social media, and face-to-face meetings of senior management and key executives of the Company with the press, the market, and other stakeholders with whom the Company interacts in the ordinary course of its business.

In this regard, **the Regulations of the Executive Committee**, in Chapter II: Mission of the Board, Article 5, General supervisory function, Section 3, states that:

"Those powers legally and statutorily reserved to the direct knowledge of the Committee and those necessary for the responsible exercise of the general supervisory function may not be delegated. For these latter purposes, the Committee undertakes, in particular, to directly exercise the following responsibilities [...]: Paragraph L: "determination of the policy for information and communication with shareholders, markets, and public opinion, paying special attention to the process of preparation and presentation of financial information and the management report, which shall include, where appropriate, the mandatory non-financial information that, due to its status as a listed company, must be published periodically."

[https://media.ohlaigroup.com/wpcontent/uploads/2021/07/19103825/REGLAMENTO_DEL CONSEJO DE ADMINISTRACION 2021.pdf](https://media.ohlaigroup.com/wpcontent/uploads/2021/07/19103825/REGLAMENTO_DEL_CONSEJO_DE_ADMINISTRACION_2021.pdf)

For its part, the Company's **Code of Ethics**, which constitutes one of the main elements of Corporate Social Responsibility management and is the channel for the development of the Company's corporate values, highlights, among the latter, the "*Transparency in the*

dissemination of information, which must be appropriate, truthful, verifiable, and complete” detailing that “OHLA is committed to sharing information on Group companies completely and truthfully, allowing shareholders, analysts, and other stakeholders to form an objective opinion on the Group .”

https://media.ohla-group.com/wp-content/uploads/2021/07/05101832/Codigo_etico.pdf

The Communication Policy described in this document is aligned with recommendation number four of the Good Governance Code for listed companies approved by the Spanish Securities Exchange Commission (CNMV).

https://www.cnmv.es/DocPortal/Publicaciones/CodigoGov/CBG_2020.pdf

PURPOSE AND SCOPE OF APPLICATION

The purpose of the Corporate Communication Policy is:

- To establish the principles governing the Company’s relationship with the market (i.e., shareholders, investors, rating agencies, intermediaries, journalists, customers, suppliers, and other stakeholders) with whom the Company interacts in its ordinary course of business.
- To determine the target audience for this Communication Policy.
- To set the Company’s strategy concerning economic-financial communication and non-financial communication concerning the market and other stakeholders. This strategy aims to provide complete, homogeneous, and truthful information, highlighting the Company’s commitment to transparency and sharing information among all stakeholders or interest groups.
- To establish the channels through which the Company transfers its financial and non-financial information to the market under the highest standards of transparency.

This Communication Policy has a global scope for all the companies that make up the Group. If some companies have the same or a similar regulation set in place, they must incorporate what has been set out in this document.

GENERAL PRINCIPLE

Within the scope of OHLA’s relations with the market, the Executive Committee shall ensure and promote the existence of appropriate mechanisms to safeguard, protect, and facilitate the exercise of Shareholders’ rights, within the framework of the defense of the corporate interest, in compliance with the following general principles:

- Accuracy and homogeneity in the information provided.
- Responsibility, diligence, and transparency in the dissemination of information.
- Immediacy in the transfer of announcements to the market and society at large.
- Compliance with legal obligations to disclose inside information and other regulated information.

- Boosting the Company's reputation by involving it, informatively, within the communities in which it is present, by sharing the actions carried out within the framework of its activity.
- Equal treatment and non-discrimination of the recipients of this Communication Policy.
- Equal treatment in the recognition and exercise of the rights of all Shareholders and stakeholders, who are under identical conditions and are not affected by conflicts of interest.
- Promotion of transparency, fairness, and proactivity in providing information to spokespersons and interested third parties so that they have the most current and complete information on the Company.
- Use and establish communication channels and tools that promote fluid, efficient, and regular two-way communication between the Company and its stakeholders.
- Compliance with applicable regulations and the principles of cooperation and transparency with the authorities, regulatory bodies, and competent administrations.

COMMUNICATION AND CONTACT CHANNELS

To ensure compliance with the principles mentioned above and the correct dissemination of both financial and non-financial information, OH LA makes various communication channels available to the Company's stakeholders, which include:

Spanish Securities Exchange Commission (CNMV) and other Official Bodies

One of the main channels for providing information about the Company to its stakeholders and the markets, in general, is through the Spanish market regulator, the Spanish Securities Exchange Commission (CNMV), and the channels established by other foreign authorities and supervisory entities, if applicable.

These bodies ensure the immediate dissemination and publicity of privileged and/or relevant information through the publication on their websites, as sent by the Company under the regulations in force, the recommendations, and the Code of Conduct in matters relating to OH LA's securities markets.

This type of information includes periodic financial reports and documents on Inside Information and Other Relevant Information concerning the Company and its Group, without prejudice to any other legally prescribed information or whichever information the Company deems appropriate to disclose publicly.

General Shareholders' Meeting

The Executive Committee shall promote the informed participation of the Shareholders at the General Shareholders' Meeting. It shall adopt as many measures as appropriate to enable the General Shareholders' Meeting to effectively exercise its functions under the applicable regulations and the Company's Bylaws.

As per the provisions of the Law, the Bylaws, and the Regulations of the General Shareholders' Meeting, the Company shall make available to the Shareholders all legally required documentation and any other documentation that may be of interest before the Meeting through the corporate website. It will also provide an application that will enable them to exercise their right to receive information and participate in the General Shareholders' Meeting.

An Electronic Shareholders' Forum will be set up on the Company's corporate website to facilitate their communication before the Company's General Shareholders' Meetings. Shareholders, their duly identified representatives, as well as voluntary associations of shareholders validly constituted and registered in the special registry of the Spanish Securities Exchange Commission (CNMV), may access this Forum.

A telephone line will be set up (provided for in the notice of the Meeting) to facilitate communication with Shareholders on specific matters related to the Meeting. This phone line may be used to resolve any doubts or questions from Shareholders concerning their rights and how to exercise them as quickly as possible.

Similarly, a postal and e-mail address will be set up (provided in the notice of the Meeting) to solve any question of interest to the Shareholders, as well as to report the delegation of votes and to appoint or revoke the appointment of their representatives at the Meeting.

With the support of the Secretary of the Executive Committee, the Investor Relations Department is responsible for maintaining a dialog with the proxy advisors, responding to their queries concerning the proposed resolutions to be submitted to the General Shareholders' Meeting, and providing them with the clarifications deemed appropriate.

Corporate website

The Company's official communication channel with its stakeholders and the financial market is its corporate website (www.ohla-group.com), which includes a section specifically designed for shareholders and investors (current or potential). The information posted on this website is updated regularly. <https://ohla-group.com/accionistas-e-inversores/gobierno-corporativo/#6>

Through this channel, the Company publishes^[M01]:

- Inside information, other material information, and other public information required by Law, regulators, other official bodies, and good corporate governance practices.
- General information about the Company and its Group, economic and financial information, and information related to corporate governance.
- Any information that is considered of interest to Shareholders and other stakeholders, which allows, in general terms, immediate and easy access to such information.

To facilitate the understanding of stakeholders, the information published by the Company through its corporate website is provided in Spanish and English whenever possible (in case of discrepancy, the Spanish version prevails).

The Company broadcasts the General Shareholders' Meetings live on its website. When these meetings are held, the conference calls are recorded on the occasion of the presentation of financial reports, and these files are stored temporarily.

On an annual basis, the Company publishes the Integrated Annual Report on its website, which groups the financial and non-financial information for the year. This information is available through the Corporate website.

The Integrated Annual Report consists of the Management Report and the Consolidated Financial Statements. The section referring to non-financial information is made per the GRI Standards for Sustainability Reporting requirements.

The document, as mentioned earlier, reflects, among other aspects, the Company's value generation model for the current year, the Company's business plan, the analysis of the different risks of the Company, and its business prospects.

Ethical Communication Channel

The activity of the Company and its Group may bring forth ethical conflicts and dilemmas. For this reason, an ethical communication channel has been set up for employees and stakeholders to make inquiries regarding professional practice or to report a possible violation or breach of the OHLA Group's Code of Ethics, guaranteeing the confidentiality of those who use it.

The Ethics Channel is accessible through the corporate website (<https://canaletico.ohla-group.com/>) and may be contacted by addressing the OHLA Group Ethics Communication Channel - Compliance Department by post. Pº de la Castellana, 259D, 28046 Madrid, Spain.

Investor Relations Department

The Investor Relations Department serves as an open, permanent, and transparent communication channel with the market and stakeholders.

Similarly, it is in charge of establishing the most appropriate channels for their attention, attending individually to the queries that may be received by telephone (+34 91 348 41 57), e-mail (relacion.accionistas@ohla-group.com), and mail (Pº de la Castellana 259-D, 28046 Madrid).

The Investor Relations Department, together with the Company's senior management, participates in meetings, conference calls, and roadshows with the market and different stakeholders, providing information on the Company and its Group, following the guidelines established by the Executive Committee and complying, in all cases, with the general principles outlined in this Policy, regulators, the Law, and best good governance practices.

Other media and social networks

OHLA's financial, non-financial, and corporate information is shared on the media, social networks, or internally with its employees through other internal and external communication channels such as the corporate Intranet, social networks, press releases, newsletters, and corporate publications.

POLICY MONITORING

The Economic-Financial Department, the Communications Department, and the Secretary of the Executive Committee shall ensure, within the scope of their respective competencies, that the Company complies with the applicable regulations and the guidelines established by the Executive Committee in the application of this Policy.

This Policy has been approved by the Executive Committee, at the proposal of the Chief Executive Officer, during the Meeting held on 20 January 2022.