

Policy for the communication of economic-financial, non-financial and corporate information and communication and contact with shareholders, institutional investors and proxy advisors.

15 December 2020

Applus⁺

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The Board of Directors of **APPLUS SERVICES, S.A.** (hereinafter, the Company or Applus+), following its authority to determine and approve Company policies and general strategies not permitted to be delegated, and in accordance with the Good Governance Code of Listed Companies, has approved the present **Policy for the communication of economic-financial, non-financial and corporate information and for the communication and contact with shareholders, institutional investors and proxy advisors** (hereinafter, this Policy).

This Policy develops one of the core concepts of Applus+ ESG Policy and establishes its commitment to transparency and to the promotion of corporate interest, as well as serving the legitimate interests of the Company's stakeholders. The Applus+ Board of Directors recognises the strategic objective of a responsible communication, maintaining continuous attention to the transparency of information available to the market, maximizing its dissemination and quality. It also recognizes the relevance of relations with shareholders, institutional investors and proxy advisors as well as to adhere to the market abuse regulations and for the provision of similar treatment to equal shareholders.

This Policy incorporates the former Policy on communication and contacts with shareholders, institutional investors and proxy advisors, which is therefore superseded.

Objectives and general principles

The definition of policies and general strategies of the Company, as much as the management and supervision at the highest level of the information provided to shareholders, institutional investors and proxy advisors and to the market in general fall under the Applus+ Board of Directors. It is also important for the Company to receive information from its stakeholders, to enable the Company to identify trends, events and circumstances that may affect it in reaching its objectives.

The **goal** of this **Policy** is to establish the framework and define the general principles to guide the communication of economic-financial, non-financial and corporate information and to develop the Company strategy on Investor Relations in order to ensure compliance with applicable regulations and best market practice for communication, as well as to ensure that the global investor community can make informed investment decisions, managing their expectations and providing for a two-way dialogue with the Company.

These **general principles** are the following ones:

- a. Transparency and immediacy in information releases, so that they are accurate, clear, concise and meaningful and do not lead to error or confusion.
- b. Protection of the shareholders' rights and legitimate interests.
- c. Equal treatment of equally placed shareholders that do not have any conflict of interest.
- d. Implementation of a general communication strategy regarding economic-financial, non-financial and corporate information through media, social network or other channels/means, ensuring the quality of the information, maximizing its dissemination in the market and amongst investors and other stakeholders.
- e. Compliance with applicable laws, with internal and good governance regulations, as well as with principles of cooperation and transparency with the regulatory bodies and competent authorities.

Information and communication channels

In accordance with the principles guiding this Policy, the Company provides shareholders and investors, other stakeholders and the markets in general with the following information and communication channels:

- a. **National Securities Market Commission - *Comisión Nacional del Mercado de Valores (CNMV)***. The CNMV's website, and, as appropriate, any other channel established by the authorities for foreign supervision, is the primary information channel of the Company, to which Applus+ sends for its immediate publication relevant information concerning the Company or its shares, in accordance with current regulations. This information is simultaneously uploaded onto the Company's corporate website.
- b. **Corporate website**. The Corporate website (www.applus.com) is the other main official communication means with shareholders, institutional investors, markets and its stakeholders as a whole, through which all information of interest is channeled. It is therefore a key channel to announce, amongst others, the values and culture of Applus+, to inform on the performance of its businesses, its achievements and the execution of its corporate strategy, its firm support and its progress in areas such as digitalization and innovation, as much as with the policies and procedures applied in the implementation of its strong commitment to ESG factors defined in its ESG Policy and the values in its Code of Ethics. The website is a key channel to enhance the Applus+ brand, reinforce the spirit of belonging, support diversity and talent and contribute to the development of its business.

The website is regularly updated, thus allowing for rapid publication and immediate access to content including access to historic information, ensuring that transparency of information with shareholders, markets and the general public is prioritised. Whenever possible, information is simultaneously published in Spanish and English in order to facilitate foreign investors or stakeholders' access, which in any cases of discrepancy the Spanish version will prevail.

The website includes a specific section dedicated to "**Investor Relations**" and it is also possible to subscribe to investor news alerts so notice is received when the website is updated with relevant investor information. In addition, the Investor Relations mailbox is dedicated to requests by analysts and investors who wish to obtain information about the Company. The email address investors@applus.com is available for this purpose.

After the Company's economic-financial, non-financial and corporate information is sent to the CNMV, when appropriate, it is also published in the Company's website and sent to financial analysts, media and information agencies. The Company notifies in advance results calls or presentations with analysts, indicating the date and hour of the meeting, as well as the technical media (e.g. conference call or webcast) through which the meeting can be followed live by anyone interested, as well as access to it for a period of one year after the event. The documentation of the meeting is also available on the corporate website before the meeting.

Finally, any person who wishes to report a suspected violation of the Code of Ethics or to obtain advice on doing so may address it through the available communication channel <https://www.applus.com/global/en/about-us/ethics-and-compliance/communication-channel>

- c. **Media**. The Company is occasionally invited to comment or give interviews in the media, which it will do taking care that nothing is said or produced that would violate any rules or regulations or this Policy. The Company recognizes the media as a useful tool to reach a wider audience of stakeholders to get increase understanding of the business and get its messages across. All such communications through the media are carefully controlled through the appropriate internal channels.
- d. **Social networks**. The Company is aware of the impact of communication channels through the internet and of the increase in the use of social media. For this reason, the Company intends to increase its presence on social media

where, without prejudice to its legal obligations, information of interest on the Applus+ development and activities can be released aiming to establish a fruitful and fluid dialogue with the internet community. The Company will pay due attention in case it considers using this means to publish any inside information, ensuring compliance with applicable requirements.

- e. **General Shareholders' Meeting.** The Board of Directors encourages shareholders' informed and responsible participation in the General Shareholders' Meeting and adopts such measures as are appropriate to enable that General Shareholders' Meetings fulfils its functions in accordance with the law and Applus+ Corporate governance policies.

When the General Shareholders' Meeting is called, the Company may use the services of agencies, financial institutions and intermediaries for the purposes of an improved distribution of the information amongst its shareholders and institutional investors. The Investor Relations office may adapt the means and instruments for proxy granting and distance voting to the specific circumstances of international investors.

In addition, from the call to the General Shareholders' Meeting to the end thereof, the shareholders may rely on the support of the **Shareholders Information Office**, which has a service for the organization of actions prior to the General Shareholders' Meeting, utilizing a dedicated email address juntageneral@applus.com and a telephone line.

The Board of Directors encourages the use of the corporate website to facilitate the exercise of shareholders' information and participation rights in respect of the General Shareholders' Meeting and provides for an electronic tool (the Shareholders **Electronic Forum**) which allows shareholders to ask for additional information as well as to delegate or vote electronically (<http://www.applus.com/es/InvestorRelations/Shareholders-meetings>).

- f. **Communication with proxy advisors.** The proxy advisors are entities, which provide advisory services to investors, mainly institutional, in relation to the exercise of voting rights derived from the ownership in listed companies.

From Applus+, and in particular from the General Counsel's and Investor Relations' department, a dialogue is maintained with the proxy advisors that have a suitable presence in the market with the objective of proactively sharing corporate governance progress and with dealing with shareholder queries in respect of the resolutions proposed to the General Shareholders' Meeting, and accordingly providing them with clarifications to enable an adequate level of knowledge of Applus+ which serves as a basis for the recommendations they make.

Functions and responsibilities

The management and supervision of the information communicated at the highest level to shareholders, institutional investors and the markets in general belongs to the Board of Directors, protecting and enabling the exercise of their rights and interests within the protection of the corporate interest and in accordance with the applicable laws and the good governance. In line with applicable rules and with the Regulations of the Board of Directors, the approval of the information that, being a listed company, Applus+ must publish occasionally or periodically, and any information made available to the markets, sits within the Board of Directors. The Board has approved a procedure for the publication of information on the CNMV's page in development of the Company's Internal Regulation of Conduct in the securities markets. Likewise, the Board of Directors is permanently informed through the reports of the Committees and/or the management involved in the different communication areas described in this Policy.

The Board of Directors and in particular, its Chairman (who is also Chairman of the ESG Committee), maintains contact with investors and shareholders to understand their position in order to understand their concerns, particularly in relation to Applus+ corporate governance. Other non-executive members of the Board (such as the Chairman of the

Appointments and Remuneration Committee) are at the Board's disposal in order to maintain contacts related to matters of their authority.

Applus+ encourages informative meetings and in order to strengthen relations with investors and keep the market informed about the performance of the Company and its Group. Applus+ shall carry out any other initiatives it deems appropriate, such as organising events like meetings or road shows or investor days with shareholders and investors joined by the executive directors and/or any members of the senior management it deems appropriate. In these meetings, no information that could afford them a privileged or advanced position with respect to other shareholders or the investment community will be provided.

Investor Relations Management. The Investor Relations Department is responsible for communication with analysts, shareholders and investors and the wider investment community and therefore, any contacts with them is channelled through this department, which validates and coordinates any communication. Amongst other responsibilities, the department responds to all queries sent by shareholders, institutional investors and analysts and has access to internal and external resources to support the information needs.

Without prejudice to the principles of equal treatment, information sharing and non-discrimination, the Company may tailor information and communication channels and other initiatives regarding the provision of information to and communication with shareholders, institutional investors and the market in general based on the various groups for whom they are intended.

Policy's communication and compliance control. Policy owner

This Policy is public and available on the corporate website (www.applus.com)

The owner of this Policy is Applus+ Board of Directors and the supervision of its compliance corresponds to the ESG Committee, as per the Regulations of the Board of Directors.
