

# Stakeholder Communication Policy

### 1. Introduction

The Globalvia Group and its Subsidiaries and Companies undertake their responsibilities with the Stakeholders and clients in accordance with the applicable regulations, contractual obligations and additional commitments that have been specifically acquired. To that end, one of the purposes of the Globalvia Group and its Subsidiaries and Companies is to clearly identify and understand the implicit and explicit requirements as well as the current and future needs of their clients and Stakeholders. Mutual commitments have been established for this, within a framework of cooperation and understanding, with the aim of having sound and satisfactory relations which lead to optimal and sustainable economic results.

## 2. Definitions

- **Board of Directors**: the corporate body which represents each subsidiary and company in the Globalvia Group and is the link between the Globalvia Group's companies and their respectiveshareholders.
- Subsidiaries and Companies: subsidiary corporate organisations of Globalvia which were incorporated and operate in many jurisdictions.
- **Group Companies**: companies over which Globalvia or Globalvia Infraestructuras, S.A. directly or indirectly has a stake of more than 50%.
- Stakeholder: an internal or external body or a natural or legal person with a legitimate interest in the functions and activities of Globalvia and/or its Subsidiaries and Companies by virtue of its functions or positions or as a result of the interests or economic relations with them.

## 3. Purpose

The Stakeholder Communications Policy pursues the following objective:

 Establish the general lines for the effective use of the communication by the Globalvia Group's Subsidiaries and Companies with the Stakeholders and clients in relation to the transparent management of the activities associated with their respective businesses within a framework of respect for the applicable legal and contractual obligations.

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## 4. Scope

This Policy, which was approved by Globalvia and ratified by each Board of Directors of the Group's Subsidiaries and Companies, shall be applicable to and mandatory for the Board of Directors, senior management and staff in general of the Globalvia Group's Subsidiaries and Companies.

## 5. Principles

The Board of Directors of Globalvia and of its Subsidiaries and Companies is responsible for defining the functions and responsibilities of its own management activities and those for the Globalvia Group's Subsidiaries and Companies. To do this, a number of commitments included in the Integrated Management System Policy (NG02) and in the Code of Corporate Governance were implemented with the aim of having sound and satisfactory relations which lead to optimal and sustainable economic results.

The Board of Directors of Globalvia and of its Subsidiaries and Companies undertakes to disclose the organisation's important matters in a balanced way to ensure that all the Stakeholders have access to clear and objective information. In terms of transparency, the disclosed information shall be sufficient, truthful, opportune and equitable through the appropriate communication channels with the aim of establishing direct contact between the issuer and receivers of that information as well as their interaction.

## 6.Commitments

#### Globalvia undertakes to:

- 1. Provide equal treatment in the acknowledgement, exercise and protection of the right to information of the Stakeholders with identical conditions, without prejudice to establishing specific information and communication channels for each group of Stakeholders with similar conditions.
- 2. Use the most accessible and transparent channels so that the Stakeholders have continued access regarding the management of the respective company.
- 3. Protect the principle of confidentiality when it is applicable as a result of a legal or contractual requirement and to comply with the regulations which protect confidential and/or inside information under the principles of corporate governance and cooperation with the competent regulators and authorities.
- 4. Make the corresponding verifications to make sure that the information that must be disclosed to the Stakeholders and shareholders is truthful, transparent, clear and objective; moreover, maximum efforts shall be devoted to make sure that the information disclosed to the market and third parties is



opportune, clear and transparent in such a way that it does not provide any advantages that are not allowed.

### 7. Comunication channels

The following communication channels will be used with the Stakeholders:

- Globalvia's website (https://www.globalvia.com/) and that of each Globalvia Group's Subsidiary and Company: those websites will provide corporate information and the minimum corporate governance disclosure requirements such as the mission, vision, corporate structure, governing bodies and their functions, and the financial statements of the respective company.
- Social media: in addition to the formal communication requirements, social media can be used as an expeditious and effortless communication channel to disclose information about matters such as the usual business operations, information of interest and corporate governance.

## 8. Publication

In accordance with the good corporate governance practices, this policy is public and can be seen on the Globalvia (https://www.globalvia.com/).