

**POLICY ON COMMUNICATION OF ECONOMIC-FINANCIAL, NON-FINANCIAL AND CORPORATE INFORMATION VIA MEDIA, SOCIAL MEDIA OR OTHER CHANNELS AND REGARDING CONTACTS AND RELATIONS WITH SHAREHOLDERS, INSTITUTIONAL INVESTORS AND PROXY ADVISORS OF SIEMENS GAMESA RENEWABLE ENERGY, S.A.**

(Text approved by resolution of the Board of Directors dated September 22, 2022)

The Board of Directors of Siemens Gamesa Renewable Energy, S.A. (hereinafter, "**Siemens Gamesa**" or the "**Company**"), within the framework of its reserved competence to establish the Company's policies and strategies pursuant to the provisions of article 33 of the By-laws and articles 6 and 7.3 of the Regulations of the Board of Directors, hereby approves this Policy on Communication of Economic-Financial, Non-Financial and Corporate Information via Media, Social Media or Other Channels and regarding Contacts and Relations with Shareholders, Institutional Investors and Proxy Advisors (hereinafter, the "**Policy**"), which is included within its Corporate Governance Rules.

## 1. **PURPOSE**

Siemens Gamesa aspires to be a significant driving force for progress in the communities in which the Company operates and, for such purpose, it promotes closeness and transparency in order to understand its stakeholders' expectations. Therefore, in order to achieve its corporate and social commitments, the Company shall establish effective communication channels with these groups, aiming to maintain a constant relationship and dialogue to identify the most relevant issues, providing a reasonable response to their expectations, where possible. Such stakeholders are:

- Shareholders
- Customers
- Institutional investors
- Financial investors and financial institutions acting as intermediaries, managers and depositaries of shares, financial analysts, proxy advisors, information agencies, rating agencies and indices
- Public administrations
- The National Securities Market Commission (*Comisión Nacional del Mercado de Valores*) ("**CNMV**") and any other national or foreign supervisory authorities or regulators
- Employees
- Suppliers
- Media
- Society and communities (local communities, academic institutions, NGOs, among others)

To this end, Siemens Gamesa has established a model for corporate communication and relations with its stakeholders that seeks to transmit economic-financial, non-financial and corporate information in an appropriate and reliable manner, making the Company's values and culture known, strengthening the Company's reputation, and ensuring that the Company complies with legal obligations as a listed company active in the Spanish stock markets as well as with the Trademark License Agreement concluded with Siemens AG.

In this regard, this Policy provides the general principles, communication channels, supervision system and rest of features of the corporate model regarding the Company's communication and contacts with its stakeholders.

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## 2. **SCOPE**

This Policy applies to Siemens Gamesa and to all the companies of which Siemens Gamesa is the controlling company (the “**Siemens Gamesa Group**” or the “**Group**”), which must comply in good faith with the general principles of action set out in section 4 of this Policy.

To this end, all companies of the Siemens Gamesa Group must adopt this Policy and, taking it as a reference, are responsible for creating and approving the internal regulations that allow the application of the provisions contained herein, notwithstanding the inclusion of such adjustments that are strictly necessary to meet local regulatory requirements.

## 3. **TARGET GROUPS OF CORPORATE COMMUNICATION**

Siemens Gamesa disseminates to its stakeholders economic-financial, non-financial and corporate information in different formats and through traditional and/or digital channels and instruments. Two types of stakeholders are identified in the field of corporate communication:

- Generalists: customers, public administrations, employees, suppliers, media and society and communities.
- Specialised: shareholders; financial investors, institutions and analysts; institutional investors; proxy advisors; information agencies; rating agencies and indices; CNMV and any other national or foreign supervisory authorities or regulators. Ultimate beneficiaries, to the extent appropriate based on the circumstances of the specific case, should be also included in this group.

Without prejudice to the principles set out in section 4, the Company may tailor general information and special communication channels and other reporting and communication initiatives based on the various groups for whom they are intended.

Siemens Gamesa has already implemented several policies and standards to regulate its corporate communication with specialised stakeholders, which are: (i) the *Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors*, which defines the principles of management and supervision of information provided to shareholders and markets and defines the Company's relations with shareholders, analysts, institutional investors and proxy advisors and which is replaced by this Policy, and (ii) the *Internal Regulations for Conduct in the Securities Market*, regarding the dissemination of inside information and other relevant information, as well as communications on suspicious transactions to the CNMV.

## 4. **GENERAL PRINCIPLES**

This Policy establishes, following the recommendations of the CNMV's Good Governance Code of Listed Companies, the framework of action and defines the general principles that would govern the communication of economic-financial, non-financial and corporate information via media, social media and other channels by Siemens Gamesa and its Group.

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In such communication, the rights and interests of the stakeholders must be protected within the framework of the corporate interest, all in accordance with the following principles:

- a) Dissemination of appropriate information, either compulsory or voluntary, in a transparent, clear, truthful, prompt, and consistent manner that allows its traceability, and that builds up and retains the reputation of the Company.
- b) Equal treatment and symmetry regarding stakeholders, both external and internal, who are in the same conditions and not affected by conflicts of interest, adapting the information, means, initiatives and communication channels according to the target groups and levels of confidentiality, provided that the aforementioned principles are guaranteed.
- c) Protect the reputation and the brand of Siemens Gamesa and its Group from potential damage, through a coordinated communication strategy that allows to take advantages of all communication opportunities.
- d) Promotion of continuous and updated information on the corporate activity of Siemens Gamesa and its Group, for which purpose the Company will try to ease and maximise its dissemination and quality through the communication channels it considers appropriate for this purpose, seeking to promote participation and dialogue with stakeholders in order to strengthen market trust and the Company's reputation.
- e) Protection of the rights and legitimate interests of all the shareholders and promotion of ongoing and continuous information to shareholders, not just on occasion of the call to the General Meeting of Shareholders, by making available to them effective channels in order to facilitate the exchange of communications and to keep them continuously informed of proposed resolutions that are expected to be submitted for the consideration thereof and any other information regarding the management of the Company that might be of their interest. Furthermore, in those cases in which the Board of Directors has appointed a coordinating director, this director may, on an exceptionally basis and after approval from the Board, engage in contact with investors and shareholders to know their perspectives with respect to corporate governance.
- f) Collaboration with shareholders so that reporting and market relationship practices are transparent, efficient and aligned with the corporate interest.
- g) Establishment of the mechanisms for stakeholders to report conducts that may involve improper conduct, illegal acts or non-compliance with the Corporate Governance Rules.
- h) The public dissemination of the information will facilitate the complete, correct and quick access to the disclosed information through the corporate website, where legally required or otherwise considered appropriate.
- i) Development of information means and communication channels that allow leveraging the advantages of new technologies to be used in relations with stakeholders.
- j) Compliance with the provisions of the law, the Corporate Governance Rules of the Company and the supervisory authorities' guidelines, especially, with regards to dissemination of inside information and other relevant information, as well as with the principles of cooperation and transparency with the relevant authorities, regulatory/supervisory bodies and public authorities.

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## **5. POLICY UPDATE PROCEDURE**

The Corporate Affairs Department alongside the Investors Relations Department are in charge of coordinating and facilitating the execution of this Policy and, therefore, in the event that, the Corporate Affairs Department or the Investors Relations Department receive the relevant information to be communicated from any other area of the Company, they shall ensure that it is treated in compliance with the general principles provided herein.

The Corporate Affairs Department together with the Investors Relations Department shall periodically review the practical implementation of this Policy and the validity of its content. For this reason, these Departments may promote the updating of the Policy at any time.

In this respect, the monitoring and updating procedure shall involve:

- 1) periodically analysing the Company's corporate communication management;
- 2) sharing the results of the assessment with the rest of the relevant departments/individuals involved in the implementation of the Policy, as a previous step to presenting the proposal of amendment to the Audit, Compliance and Related Party Transactions Committee;
- 3) submitting the proposal of amendment to the Audit, Compliance and Related Party Transactions Committee, which will have to report on such amendment prior to be submitted to the Board of Directors for its approval.

## **6. GENERAL INFORMATION AND COMMUNICATION CHANNELS**

### **6.1 National Securities Market Commission (CNMV) and other bodies**

One of the Company's essential information channels for shareholders and markets is the CNMV, as well as, where appropriate, the channels established by any other foreign supervisory authorities and bodies. The information that is sent to the CNMV is immediately publicly disseminated on its website via a publication of the relevant notice as inside information (hereinafter "II"), other relevant information (hereinafter "ORI") or under any other applicable category, and then included on the Company's corporate website.

After sending the Company's economic/financial, institutional and general information to the CNMV whenever required, said information is disseminated to regional, national and international financial analysts, institutional and non-institutional investors, media and information agencies.

### **6.2 Corporate website**

In addition to the CNMV, another essential official communication channel between the Company and its stakeholders is the corporate website ([www.siemensgamesa.com](http://www.siemensgamesa.com)), which is one of the most important means to encourage the engagement thereof in the corporate life, reinforce their sense of belonging and their trust, strengthen the corporate brand and promote the development of the businesses of the Siemens Gamesa Group.

In order to encourage the relations and engagement of the shareholders and the markets with the Company, the corporate website offers, among others, a specific space dedicated to Shareholders and Investors. Furthermore, the corporate website is continuously updated with all information that it is obliged to disclose according to applicable law and regulations, or such information that may be of interest, favouring immediate publication thereof and subsequent

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access thereto in order for transparency to be the priority value that shapes relations between the Company and shareholders, markets and the general public.

Whenever possible, the information that the Company provides via its corporate website is published simultaneously in Spanish and English in order to facilitate consultation by foreign investors, with the Spanish-language version prevailing in the event of a discrepancy, unless otherwise stated in a specific document.

### **6.3 Social media**

Siemens Gamesa is aware of the impact of new information technologies and online communication channels. It therefore has an active presence on social media (Twitter, Instagram, Facebook and LinkedIn), on which, without prejudice or detriment to compliance with its legal obligations, and its internal regulations (i.e. the Social Media Recommendations and the Principles of Communication and Public Affairs, and/ or any other internal policy that supplements or replaces them), it disseminates information of interest on the Company and its Group's corporate activity, seeking to establish a fluid and fruitful dialogue with the online community. When disseminated through these channels, the disclosed information should be accurate and clear so that it would not be necessary to consult additional sources to completely understand the message; and the information should be communicated in an accurate way, avoiding the inclusion of additional information or tweaks which might be essential for the understanding of the information in further answers or conversations.

## **7. CHANNELS OF COMMUNICATION WITH THE SHAREHOLDERS**

Siemens Gamesa pays special attention to our shareholders, with one of its priorities being to achieve a high level of transparency and participation in order to strengthen shareholder trust, in addition to maximising the creation of value for the shareholder.

To this end, the Board of Directors establishes appropriate channels for shareholders and any ultimate beneficiaries to be continuously informed and to be able to make proposals in relation to the Company, in accordance with law and the Corporate Governance Rules.

The Company has the following shareholder communication channels for such purposes:

### **7.1 Shareholders' Office**

The primary aim of the Shareholders' Office is to act as an open, permanent and transparent communication channel between the Company and its shareholders.

As such, and in order to personally handle the queries, questions or suggestions that shareholders wish to raise, a free service line (900 504 196) and an email address (info\_accionista@siemensgamesa.com) are made available thereto.

Shareholders may request delivery of the Annual Corporate Governance Report, periodic information or any other public information through the Shareholders' Office.

### **7.2 Electronic Shareholder Forum**

Upon the holding of the General Meeting of Shareholders, the Electronic Shareholder Forum will be activated on Siemens Gamesa's corporate website, and individual shareholders or duly accredited voluntary associations of shareholders shall have access thereto. The purpose of this electronic platform is to facilitate communication among the Company's shareholders upon the

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call and until the holding of each General Meeting of Shareholders. However, it does not constitute a valid channel for the exercise of the rights granted to shareholders by law and the Corporate Governance Rules.

## **8. CHANNELS OF COMMUNICATION/RELATIONS WITH ANALYSTS AND INSTITUTIONAL INVESTORS**

The Investors Relations Department individually responds to consultations from shareholders, institutional investors and financial analysts.

The Company also organises informational meetings on the progress of the Company and of the Siemens Gamesa Group or other aspects of interest for financial analysts and institutional investors, so that they have adequate information on the Company. All of the foregoing must be understood to be without prejudice to the Company's strict respect for the principle of equal treatment of all shareholders who are in identical conditions and not affected by conflicts of interest.

Additionally, the Institutional Investors Relations inbox is dedicated to receiving requests from financial analysts and institutional investors wishing to obtain information on the Company, for which purpose an email address (IRSG@siemensgamesa.com) is made available thereto. However, requests from private investors shall be answered via the Shareholders' Office (info\_accionista@siemensgamesa.com).

## **9. GENERAL MEETING OF SHAREHOLDERS**

The Board of Directors undertakes the commitment to promote the informed and responsible participation of shareholders at the General Meeting of Shareholders, and adopts, via the Rules for Conducting the General Meeting of Shareholders and other means, such measures as are appropriate to enable the shareholders to effectively perform their duties according to law and the Corporate Governance Rules.

The Company may issue and send attendance, proxy and absentee voting cards to shareholders in order to enable their informed participation at the General Meeting of Shareholders.

Upon the call to the General Meeting of Shareholders, the Company may use the services of financial firms, institutions and intermediaries to better distribute information among its shareholders and investors. The Investors Relations Department may adjust proxy and absentee voting means and tools to the characteristics of professional and qualified investors.

Moreover, the shareholders may rely on the support of the Shareholders' Office, which has means for the organization of presentations and events prior to the General Meeting of Shareholders. If the General Meeting of Shareholders is held only in person or in person with the ability to attend remotely, the Shareholders' Office shall have a specific site at the premises where the meeting is held in order to answer to questions that the attendees may ask, as well as to serve and provide information to those who wish to take the floor during the meeting.

The General Secretariat is responsible for maintaining dialogue with proxy advisors, responding to their queries with regard to proposed resolutions submitted at a General Meeting of Shareholders and providing them with the clarifications deemed appropriate.

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The Company will rely on financial institutions acting as intermediaries, managers and depositaries of shares of the Company which will inform the shareholders of the rights they may exercise and shall ensure that the instructions that they transmit to the Company on behalf of their clients are valid and accurately coincide with those received from the holders or from the proxy representatives of the deposited shares.

From the publication of the announcement of the call to meeting until at least the holding of the General Meeting of Shareholders, the Company must continuously publish on its corporate website the information required by law and by the Corporate Governance Rules. Moreover, an English translation of a complete or summarised version of the main reports and documents relating to the General Meeting of Shareholders shall be included as soon as possible after publication of the announcement of the call to meeting, with the Spanish-language version always prevailing in the event of a discrepancy.

The Board of Directors promotes the use of the corporate website to enable the exercise of the shareholders' rights to receive information and to participate in connection with the General Meeting of Shareholders.

After the publication of the call to the General Meeting of Shareholders, a software tool is made available to the shareholders on the Company's corporate website (avoiding documents in paper form, favouring respect for and protection of the environment) allowing them to request information, grant their proxy and cast an absentee vote and to obtain the documentation deemed appropriate to facilitate informed attendance of the shareholders at the General Meeting of Shareholders. These include, among other documents, any implementing rules that the Board of Directors may adopt within its purview for each General Meeting of Shareholders, which shall contain the specific rules for the exercise of shareholders' rights, and, specifically, a system for granting proxies and casting absentee votes by remote means of communication (including electronically and by post), as well as the various rules for determining the direction of the vote.

The Company also enables the participation of shareholders and institutional investors in the General Meeting of Shareholders recognizing the validity of voting instructions sent through the voting platforms within the framework of the provisions of law.

In addition to the rules set forth in this Policy, the information made available to the shareholders upon the holding of the General Meeting of Shareholders shall be governed by the provisions of the Corporate Governance Rules, and particularly of the By-Laws, the Regulations of the Board of Directors and the Corporate Governance Policy of Siemens Gamesa and of its Group.

## **10. OTHER CORPORATE COMMUNICATION CHANNELS**

Siemens Gamesa has other communication channels and tools to disseminate economic-financial, non-financial and corporate information, whose operation, updating and optimization is constant. These channels and tools present and maximize dissemination of such information in a way that is understandable and useful to all stakeholders.

Such communication channels and means are the following:

- Press release: a document prepared and distributed to the media by the Corporate Affairs Department of the Company.
- Public appearances: the presentation of economic-financial results, non-financial information and communications on other corporate processes. This activity shall be

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coordinated, where appropriate, with Investors Relations or Corporate Affairs. The target audiences are heterogeneous: public representatives and authorities, regulatory/supervisory bodies, journalists, analysts, customers, among others.

- Press conferences: meetings of journalists and other external influencers with a representative of Siemens Gamesa, who exposes or presents company-related information.
- Internal channels of the Company: such as intranet, MS Yammer, MS Teams, newsletters, townhalls, emails.
- Individualized management with the media and other external influencers: among other channels/means, telephone calls or videoconferences, meeting with journalists, etc.

Additionally, Siemens Gamesa disposes other communication channels focused on active listening between the Company and its stakeholders (i.e. the Integrity Hotline) which allow all Siemens Gamesa employees, management, customers, suppliers, shareholders or any other third party proving a legitimate interest to report compliance violations, irregular conducts or illegal acts in a safe and consistent way.

## **11. INSIDE INFORMATION AND OTHER RELEVANT INFORMATION**

Dissemination of inside information and other relevant information that Siemens Gamesa shall publish according to legal requirements shall consider conditions and channels set forth by the applicable laws and the Company's internal regulations, to ensure that all legal obligations are complied with as set out in the Internal Regulations for Conduct in the Securities Market, the Business Conduct Guidelines and the Regulations of the Board of Directors, and the supervisory authorities' guidelines.

The information to be reported to the CNMV may not be publicly disseminated by any other means without prior publication thereof on the CNMV's website. Furthermore, the information provided through channels different to the CNMV's website, as the main official channel through which the Company disseminates inside information or other relevant information, shall be consistent with the information provided through the CNMV referring to that same information.

All inside information and other relevant information shall be reported immediately to the General Secretary and the Secretary of the Board of Directors. This also applies to such information on which there are doubts as to whether it contains inside information or other relevant information.

In order to ensure that the dissemination of news that may contain inside information or other relevant information occurs transparently, symmetrically and in accordance with the provisions of law and the Corporate Governance Rules, the Company has established the following internal coordination rules:

- a) If the information generated by the Company can be classified as inside information or other relevant information or if there is any doubt as to the obligation to notify the CNMV thereof in accordance with law and the Corporate Governance Rules, the General Secretary or the Secretary of the Board of Directors will determine whether it is necessary to submit an II or ORI disclosure to the CNMV and, if so, prepare, review and send it to the CNMV via the contact persons authorised and designated by the Company for such purpose.

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- b) Disclosures of II or ORI must be made to the CNMV by the person designated for such purpose. The Company shall designate one or more persons as authorised to respond to the questions that such body may ask in relation to such information.
- c) Disclosure to the CNMV must be made prior to or at the same time as its public dissemination by any other means, and the various disclosures made must be duly consistent.
- d) Without prejudice to the foregoing, the information generated by the Company may be communicated to the shareholders and markets by any means, provided that it is clearly not necessary to communicate such information to the CNMV as II or ORI according to law and the Corporate Governance Rules.
- e) Meetings with analysts, investors or media must be planned in advance such that those taking part therein do not disclose II nor ORI that has not been previously disseminated in the market in accordance with the provisions of this section.

## **12. DISSEMINATION**

The Company shall publish on its corporate website an annual report on the practical application of this Policy, including information on relations with institutional investors and with proxy advisors and identifying the contact persons and persons responsible for implementation thereof.

## **13. CONTROL**

The Board of Directors is responsible for approving, updating and promoting this Policy.

The application of this Policy is subject to regular review by the Audit, Compliance and Related Party Transactions Committee, which shall also be responsible for supervising the communication and relations strategy with shareholders, investors and proxy advisors.

The Company's Board of Directors shall be regularly informed of the application of this Policy and of the main relations of the Company with analysts and institutional investors, proxy advisors and with shareholders.

Furthermore, the Chief Executive Officer (CEO), assisted by the General Secretary, the Corporate Affairs Department and the Investors Relations Department, shall ensure consistency and alignment of the communications to all stakeholders, and compliance with the principles of this Policy in all of them. The Corporate Affairs Department and the Investors Relations Department will jointly report annually to the Audit, Compliance and Related Party Transactions Committee on the implementation of this Policy, which will then inform to the Board of Directors.

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