POLICY ON COMMUNICATION AND CONTACTS 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 25, 2019)
POLICY ON COMMUNICATION AND CONTACTS WITH SHAREHOLDERS, INSTITUTIONAL INVESTORS AND PROXY ADVISORS

Pursuant to articles 33 of the By-Laws and 6 and 7.3 of the Regulations of the Board of Directors, the Board of Directors of Siemens Gamesa Renewable Energy, S.A. (hereinafter “Siemens Gamesa” or the “Company”, and the group of companies of which Siemens Gamesa is the controlling company, the “Siemens Gamesa Group”) hereby approves this Policy on Communication and Contacts with Shareholders, Institutional Investors and Proxy Advisors, which is included within its Corporate Governance Rules.

1. GENERAL PRINCIPLES

The Board of Directors of Siemens Gamesa has the power to manage and supervise information conveyed to the shareholders and to the markets and relations with shareholders, institutional investors and proxy advisors, adopting the appropriate measures to protect the exercise of their rights in the context of defence of the corporate interest, all in accordance with the following principles:

a) Transparent, clear, accurate, uniform and simultaneous dissemination of information, permitting an evaluation of the Company's management and economic/financial results.

b) Equal treatment in the recognition and exercise of the rights of all shareholders who are in identical conditions and not affected by conflicts of interest.

c) Protection of the legitimate rights and interests of all shareholders.

d) Promotion of on-going and continuous information to shareholders, not just on occasion of the call to General Shareholders' Meeting of Shareholders, for which purpose the Board of Directors proposes making effective channels available thereto in order to facilitate the exchange of communications with shareholders and so that they are continuously informed regarding any proposals be made in relation to the management of the Company, in accordance with law and the Corporate Governance Rules.

e) Collaboration with shareholders so that reporting and market relationship practices are transparent, efficient and aligned with the corporate interest.

f) Development of information technology tools and communication channels in order to be able to take advantage of new shareholder relations technologies.

g) Compliance with the provisions of law and the Corporate Governance Rules, as well as with the principles of cooperation and transparency with competent authorities, regulatory bodies and government administrations.

These principles are applicable to the Company's information for and relations with shareholders, markets and other interested or related parties, such as financial institutions acting as intermediaries, managers and depositaries of shares of the Company, financial analysts, regulatory and supervisory bodies, rating agencies, information agencies and proxy agents, among others.
Without prejudice to the principles of equality and symmetrical information, the Company may adapt the information technology tools and communication channels and the other initiatives regarding shareholder and market information and relations, based on the various groups to which they are addressed, provided that the principle of equal treatment of shareholders in identical conditions is guaranteed.

As regards regulatory compliance, the rules on processing of inside and significant information as provided by law and the Corporate Governance Rules shall be particularly taken into account.

Finally, in those cases in which the Board of Directors has appointed a lead independent director in accordance with the provisions of law and the Corporate Governance Rules, the lead independent 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.

2. INFORMATION AND COMMUNICATION CHANNELS

2.1 National Securities Market Commission and other bodies

One of the Company’s essential information channels for shareholders and markets is the National Securities Market Commission (Comisión Nacional del Mercado de Valores) (“CNMV”), as well as the channels established by any other foreign supervisory authorities and bodies, with the information that is sent to these entities immediately being publicly disseminated via a publication of significant events on their websites, which are simultaneously included on the Company’s website.

2.2 Corporate website

In addition to the CNMV, another essential official communication channel between the Company and shareholders and markets is its corporate website (www.siemensgamesa.com), which offers a specific space dedicated to Shareholders and Investors and is continuously updated, favouring immediate publication thereof and subsequent access 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.

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

Specifically, the Company announces results presentations sufficiently in advance, stating the date and time when it is planned to hold the meeting as well as any technical means (for example, videoconference or webcast) via which any interested party may follow it live.
The supporting documentation for the meeting is also made available via the corporate website prior to the commencement thereof, and a recording of the meeting is made available to shareholders for a period of one month.

2.3 Social media

The Company is aware of the impact of new information technologies and online communication channels. It therefore promotes an active presence on social media (including Twitter, where the Company maintains a presence through the @SiemensGamesa account), through which it seeks to disseminate information of interest regarding the performance and activities of the Siemens Gamesa Group and to establish a fluid and fruitful dialogue with the online community, without prejudice or detriment to compliance with its legal obligations.

The Company also aims to ensure that General Meetings of Shareholders are partly or wholly disseminated through social media. For such purposes, it may publish the main news from the event online in real time, post photographs of the meeting to Company channels live and share presentations on a website.

2.4 Internal coordination for the dissemination of news likely to contain significant information

In order to ensure that the dissemination of news likely to be deemed significant for the market occurs transparently, symmetrically and in accordance with the provisions of law and the Corporate Governance Regulations, the Company has established the following internal coordination rules:

a) If the information generated by the Company is likely to be classified as significant for the market or there is any question as to the obligation to notify the CNMV thereof in accordance with law and the Corporate Governance Rules, the Secretariat of the Board of Directors for matters within the competence of the Board of Directors and on the other hand the General Secretariat for the rest of matters, will determine whether it is necessary to submit a prior notice of significant event to the CNMV and, if applicable, to prepare, review and send it to the CNMV via the contact persons authorised and designated by the Company for such purpose.

b) Disclosures of significant information 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 the significant information.

c) Disclosure to the CNMV must be made prior to or at the same time as 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 a significant event according to law and the Corporate Governance Regulations.

e) General meetings with analysts, investors or media must be planned in advance such that those taking part therein do not disclose significant information that has not been previously disseminated in the market in accordance with the provisions of this article.
3. SHAREHOLDERS’ OFFICE AND ELECTRONIC SHAREHOLDER FORUM

Siemens Gamesa pays special attention to the group of shareholders joining in its corporate enterprise, 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 shareholder value.

With this aim, the Board of Directors establishes appropriate channels for shareholders to be continuously informed and 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:

3.1 Shareholders’ Office

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

As such, and in order to personally attend to the questions 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.

3.2 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 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 Regulations.

4. RELATIONS WITH ANALYSTS AND INSTITUTIONAL INVESTORS

In addition to shareholder consultations, the Investor Relations department individually attends to 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).

5. **GENERAL SHAREHOLDERS’ MEETING**

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

Upon the call to the General Shareholders’ 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 Investor Relations department may adjust proxy and absentee voting means and tools to the characteristics of professional and qualified investors.

Financial institutions acting as intermediaries, managers and depositaries of shares of the Company must inform the shareholders of the rights they may exercise and must ensure that the instructions their clients give to the Company 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 until at least the holding of the General Shareholders’ 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 Shareholders’ 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.

In addition to the rules set forth in this policy, the information made available to the shareholders upon the holding of the General Shareholders’ Meeting 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 of companies.

6. **DISSEMINATION**

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

7. **CONTROL**

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 shareholder and investor communication and relations strategy.
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 institutional analysts and investors and with significant shareholders.