



## **INFORMATION, COMMUNICATION AND CONTACT WITH SHAREHOLDERS, INSTITUTIONAL INVESTORS AND PROXY ADVISORS POLICY**

The Board of Directors of PROMOTOR DE INFORMACIONES, S.A. (“PRISA”, or the “Company”) is the body responsible for establishing and overseeing adequate mechanisms to ensure the transparency and quality of the information and to maximize its dissemination in the markets in general.

In particular, the Board of Directors is responsible for defining and supervising at the highest level the communication and relations policy with the Company's shareholders and institutional investors, as well as with proxy advisors, facilitating the exercise of their rights and ensuring equality of treatment between them in order to prevent situations of privilege or market abuse. Likewise, the Board of Directors or, if so provided in the Board of Directors Regulations, the corresponding Commission, is responsible for supervising the information provided to the aforementioned stakeholders.

To this end, the Board of Directors has approved this *Information, communication and contact with shareholders, institutional investors and proxy advisors policy*, which will guide the Company's communication with the referred groups, with other stakeholders and with the market in general.

### **1. General principles:**

The Company's communication with shareholders, institutional investors, proxy advisors, other stakeholders and with the markets in general shall be conducted in accordance with the following basic principles:

- a) Veracity, transparency, equality and symmetry in information disclosed.
- b) Strict compliance, in both timing and form, of its legally required disclosure and reporting obligations.
- c) Protection of the legitimate rights and interests of all shareholders. Provision to shareholders of adequate channels of communication for the exercise of their right to information.
- d) Equality of treatment in recognition and exercise of the rights of all shareholders who are in the same position.
- e) Implementation of a general strategy for communicating economic-financial, non-financial and corporate information through the information and communication channels set forth in this Policy that contributes to maximising the dissemination and quality of the information available to the market, shareholders and investors and other stakeholders.
- f) Encourage continuous and constant information with shareholders and investors, and not only on the occasion of calling the General Shareholders' Meetings.

- g) Compliance with the provisions of the Law and the Company's internal regulations, taking into account market abuse regulations and the rules on the treatment of inside information and other relevant information.

The abovementioned principles apply to the Company's information and communications with shareholders, institutional investors and other stakeholders, such as proxy advisors, intermediary financial institutions, financial analysts, regulatory and supervisory bodies, credit rating agencies, information agencies, etc.

Without prejudice to the principles of equal treatment and non-discrimination, the Company may adapt general information and special communication channels and other information and communication initiatives in accordance with the various target groups.

## **2. General channels of information and communication:**

The main information channels to be used by the Company for the dissemination of economic-financial, non-financial and corporate information shall be as follows:

### **a) National Securities Market Regulator (“CNMV”) and other official bodies.**

The CNMV website ([www.cnmv.es](http://www.cnmv.es)) is one of the main general channels of information on the Company.

Through this website, the Company communicates information which, in accordance with current legislation, is considered inside or relevant, as well as other economic-financial, non-financial and corporate information required by applicable law.

The information submitted to the CNMV through the publication of notifications on its website is immediately disclosed. The communications sent to the CNMV regarding the Company are immediately incorporated into the corporate website.

Furthermore, when legally required, the Company complies with its reporting obligations before other official entities.

### **b) Corporate website.**

The corporate website ([www.prisa.com](http://www.prisa.com)) constitutes one of the Company's most relevant information channels to all its stakeholders.

Through the corporate website, the Company makes available to shareholders, institutional investors and the markets in general all information whose publication is mandatory or may be of interest, whether of an economic-financial, non-financial or corporate nature, favouring the immediacy of its publication and the possibility of later access, thus contributing to transparency as paramount value that shapes the Company's relations with the markets and with the public in general. To this end, the information is incorporated simultaneously and is updated constantly, whenever possible, in Spanish and English, with the Spanish version prevailing in the event of any discrepancies, unless expressly otherwise indicated.

In particular, the corporate website:

- (i) provides extensive information on the areas of activity and geographic presence of the PRISA Group, as well as on the social and cultural projects being carried out. It also publishes press releases related to the Group.

- (ii) has a specific section named "Shareholders and Investors" that includes all information required by the Corporate Enterprises Act and by laws and regulations on the securities market (which includes the Company's internal corporate governance regulations, information on shares, periodic financial information, the annual accounts and the management report -which includes the non-financial information report-, information on the Board of Directors and the management team, the annual corporate governance report, the annual report on directors' remuneration, the annual sustainability report).
- (iii) allows immediate access to communications of inside information and other relevant information submitted to the CNMV.
- (iv) publishes the legally required information in relation to calling and holding general shareholders' meetings and provides shareholders with an IT tool to promote their informed participation at the general shareholders' meetings, allowing them to exercise their rights to information and participation. In addition, shareholders' meetings are broadcast live through this website.
- (v) streams the Company's presentations of the financial results that are carried out periodically and in which institutional investors and analysts are given the opportunity to ask questions. The Company procures to keep accessible on the corporate website, for a reasonable period of time, the complete retransmission of each presentation.

### **c) Meetings with shareholders and investors.**

The Company periodically organises information meetings on the progress of the Company and of the Group, or about other matters of interest for analysts and institutional investors, in relevant financial centres (road shows) in Spain and other countries, which are attended by the Chief Executive Officer and other managers of the organisation.

Likewise, the Company, regularly attends events organised by investment banks in order to meet with institutional investors.

Further, and as mentioned above, the Company periodically organises and on the occasion of the publication of financial results, conference calls that are streamed through the corporate website and with simultaneous translation into English, in which its management team and analysts and institutional investors participate.

In such meetings and events, the Company responds to requests for information, unless the information is confidential, and without prejudice to the strict observance of the market abuse regulations and the principle of equality of treatment of all shareholders. The Company shall take special account of rules on the treatment of inside information, other relevant information, and relations with investors and with markets as set out in the Law and in the Company's internal rules and regulations (and, in particular, the Board of Directors Regulations, the Internal Code of Conduct on Matters Relating to the Securities Market and the Ethical Code).

### **d) Investor Relations Office and Shareholder Relations Office**

The Company has two open, permanent, and transparency channels of communication with its shareholders and institutional investors, through the Investor Relations Office and the Shareholder Relations Office, which answer queries, proposals, questions and requests

for information in a manner that gives primacy to the company interest and observes the law and the Company's corporate governance rules. In no case shall information be provided that might provide a situation of privilege or advantage over other shareholders and investors, with unfailing observance of the market abuse regulations in terms of inside information and relevant information, as set out in section 1 above. These channels are as follows:

- i. The Investor Relations Office (part of the Investor Relations Department which, in turn, is part of the Company's Finance Department) mainly deals with analysts and institutional investors, and the information it provides is mainly related to the Company's management and financial results, and its performance in the markets. This office also responds to questions that may be asked by non-controlling shareholders about the share's performance in the markets.
- ii. The Shareholder Relations Office (part of Company's General Secretariat) deals mainly with non-controlling shareholders and provides information related to the Company's corporate governance matters (ways of accessing available information, orientation on the corporate website, matters related to general shareholders' meetings, etc.).

The contact details (e-mail address and telephone number) of the Investor Relations Office and the Shareholder Relations Office are permanently updated on the corporate website.

#### **e) General Shareholders' Meeting**

*Calling and holding the General Shareholders' Meeting: shareholders' rights to information and participation*

As part of the holding of the Company's General Shareholders' meeting, the Board of Directors aims to promote the informed and responsible participation of shareholders and adopt any measures and assurances appropriate to help the General Meeting effectively exercise its functions under the law and the Company's corporate governance rules and regulations. In particular, the Board of Directors shall adopt the following measures:

- (i) it will ensure that as much information as is required by law has been made available to shareholders prior to the General Shareholders' Meeting; and will procure to ensure that all information that may be of interest and can reasonably be provided is also made available to shareholders, even if not legally required;
- (ii) it will respond, with the utmost diligence, requests for information submitted by shareholders prior to the General Shareholders' Meeting; and
- (iii) will attend, with the same diligence, the questions submitted by shareholders on the occasion of the General Shareholders' Meeting.

On the occasion of calling the Shareholders' Meeting, the Board of Directors promotes the use of the corporate website to facilitate the exercise of shareholders' rights to information and participation in relation to the General Shareholders' Meeting, and provides them with an IT tool that allows them to request information, delegate their representation and vote remotely. The corporate website includes an English translation of the main reports and documents made available to shareholders, with the Spanish version prevailing in the event of any discrepancies, unless otherwise indicated.

From the time the Shareholders' Meeting is called and until it is held, the Shareholder Relations Office will guide shareholders on the different procedures available to them to exercise their rights within the framework of the Shareholders' Meeting and, especially, their rights to information, voting and representation.

Likewise, shareholders representing at least three percent of the share capital may: a) request publication of a supplement to the call of the Ordinary General Shareholders' Meeting, including one or more items on the agenda of the call, provided that the new items are accompanied by an explanation or, if appropriate, a justifying resolution proposal; and b) present reasoned proposals of resolutions regarding items already included or that should be included on the agenda of the call to any General Shareholders' Meeting called. Shareholders should exercise the aforementioned rights loyally, in good faith and within the framework of the corporate interest, under the terms set out in the Law. The Company may gather the necessary documentation and information to verify compliance with these terms. The Company shall ensure that the new items on the agenda and the proposed resolutions that are submitted, as well as the documentation that may be attached, are published in accordance with the provisions of the Law and, in any case, as soon as possible, and shall procure to publish a new model for the attendance, delegation and distance voting card that includes the additional items on the agenda and proposals.

Public requests for the delegation of votes made by the Board of Directors or by any of its members must justify in detail the sense in which the representative will vote if the shareholder does not specify voting instructions and, if appropriate, disclose the existence of conflicts of interest.

On occasion of the call of the General Shareholders' Meeting, the Company may engage the services of agencies, bodies and financial intermediaries to better distribute information among shareholders and investors.

*Communication with proxy advisors:*

The General Secretariat and the Investor Relations Office deal with the queries of proxy advisors in relation to proposed resolutions submitted to the General Shareholders' Meeting, and provide them with any explanations deemed appropriate.

#### **f) Dissemination of news to the market through the media:**

*Corporate Communication and Institutional Relations Department. Drafting and distribution of press releases:*

The Company has a Communications and Institutional Relations Department, one of whose tasks is to draft and distribute to the media press releases related with news about the Company or its business group, pursuant to, in any case, the provisions of the following section on *Internal coordination for disclosing news that may contain inside information or other relevant information*.

Likewise, stakeholders can send their queries, suggestions and complaints to the Company's Corporate Centre through the Communication and Institutional Relations Department, whose contact details are permanently updated on the corporate website.

It should also be noted that Prisa is the parent company of one of the most important media groups in the Spanish-speaking world and that the Group's media have different

channels open at all times to ensure fluid communication with a plurality of interests and social sensitivities.

*Internal coordination for disclosing news that may contain inside information or other relevant information*

To ensure that the dissemination of news likely to contain inside information or other relevant information is carried out under transparency and symmetry conditions of and in accordance with the provisions of the Law and the Company's internal regulations (and, in particular, the Internal Code of Conduct on Stock Exchange Matters), the following internal coordination rules have been set:

- i. In the event that the information produced in the Company may be classified as inside information or other relevant information, or if there is any doubt regarding the obligation to notify it to the CNMV in accordance with the Law, it shall be the responsibility of the Secretary of the Board of Directors to determine the appropriateness of submitting a prior communication of such nature to the CNMV and, where appropriate, to draft, review and send it to this commission through the authorised spokespersons appointed by the Company for this purpose.

The information to be disclosed to the CNMV may not be disclosed by any other means without first being published on its website. In addition, the content of the information disclosed to the market by any information or communication channel other than the CNMV must be consistent with the information submitted to that commission.

- ii. Shareholders, institutional investors and the markets may be informed, without being subject to the above, of the information produced in the Company by any means that complies with this Policy, provided that there is no doubt that it is not necessary to submit it to the CNMV because it does not constitute inside or other significant information or when, having checked with the Secretary of the Board of Directors, the latter has considered, in accordance with the rules established in the previous section, that it is not mandatory to submit the information to the CNMV.

**g) Social networks:**

The Communications and Institutional Relations Department also uses social networks as a vehicle to disclose news about the Company or its business group, in accordance with, in any case, the provisions of the previous section on *Internal coordination for disclosing news that may contain inside information or other relevant information*.

**h) Complaints Channel:**

The Company has a complaints channel, accessible from the corporate website, for all stakeholders related with Prisa. Through this channel, complaints can be submitted regarding any possible irregularities or non-compliance related with financial, accounting or commercial malpractices or regulatory non-compliance committed by employees or Group companies.

This is a confidential communication channel between stakeholders and the Audit, Risk and Compliance Committee and the Company's management.

**3. Control:**

The Company's Appointment, Remuneration and Corporate Governance Committee (“**ARCGC**”) has among their responsibilities overseeing the strategy of communication relations with shareholders and investors, and, in particular, supervising the application and verifying compliance with this Policy as well as monitoring the way in which the Company communicates and relates with small and medium sized shareholders. Likewise, the ARCGC is responsible for supervising and evaluating the relations processes with the different stakeholders.

The Board of Directors shall be regularly informed of the Company's main relations with shareholders, institutional investors and proxy advisors pursuant to this *Information, communication and contact with shareholders, institutional investors and proxy advisors policy*.

This *Information, communication and contact with shareholders, institutional investors and proxy advisors policy* was initially approved by the Board of Directors on 18 December 2015 and was last amended on November 16, 2020, at the proposal of the ARCGC.