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# **POLICY ON COMMUNICATION WITH SHAREHOLDERS AND INVESTORS**

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Secuoya, Grupo de Comunicación, S.A. & the Companies within its Group

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## 1. INTRODUCTION

At Secuoya, Grupo de Comunicación S.A. (hereinafter, Secuoya), we value our shareholders and investors as fundamental parts of our identity and activities. We understand the importance of their effective and sustainable involvement in Secuoya, as well as maintaining effective and transparent communication to ensure their participation in relevant aspects that affect and define our corporate governance and business strategies.

Therefore, we commit to maintaining transparent, effective, and consistent communication with them, overseeing at the highest level the guarantee of providing accurate and timely information about our management and business performance. We also commit to protecting the exercise of their rights and defending their interests in the promotion and defense of the social interest, as well as in the market in general and with our stakeholders, creditors, regulatory and supervisory bodies.

For these reasons, the Board of Directors of Secuoya approves this Policy on communication and contact with shareholders, institutional investors, and voting advisors (hereinafter, the Policy), as a demonstration of Secuoya's firm commitment to building relationships of trust, closeness, and transparency with our shareholders and investors.

## 2. PURPOSE

This Policy is intended to establish the general principles regarding communication and contacts between Secuoya and its shareholders, institutional investors of Secuoya within the Group, as well as with voting advisors. Its objective is to determine the manner, channels, and means through which we communicate with our shareholders and investors, ensuring the exchange of timely and reliable information. Additionally, it defines the key moments when we provide relevant information to them.

## 3. SCOPE

This policy applies to all entities that are part of Secuoya Content Group.

## 4. PRINCIPLES OF OPERATION

The principles established in this Policy, outlined below, constitute the core values that shape Secuoya's relationships with the markets and the general public, with a commitment to respecting regulations against market abuse and ensuring equal and fair treatment of shareholders and investors.

- I. Transparency, truthfulness, immediacy, equality, and symmetry in the dissemination of economic, financial, non-financial, and corporate information.
- II. Equal treatment in the recognition and exercise of the rights of all shareholders and investors who are in identical conditions and are not affected by conflicts of competition or interest.
- III. Promotion of the involvement of institutional shareholders and investors in Secuoya, particularly by facilitating access to information related to the Policy.
- IV. Promotion of shareholder collaboration to ensure that information practices and market relations are transparent, effective, and in line with the social interest
- V. Protection of the legitimate rights and interests of all shareholders and investors.
- VI. Implementation of a general strategy for communicating financial, non-financial, and corporate information through the information and communication channels established in this Policy, aiming to maximize the dissemination and quality of information available to the market, investors, and stakeholders of Secuoya.
- VII. Establishment of information channels that contribute to maximizing the dissemination and quality of information available to shareholders, investors, the market, and other stakeholders.
- VIII. Information will be continuously and permanently disseminated through effective channels established by this Policy and under the supervision of the Board.
- IX. Published information will be clearly drafted and must be truthful, correct, and complete in all relevant aspects and in accordance with applicable legal and regulatory obligations, in order to provide a true and fair view of Secuoya's financial and non-financial situation, results, and business in all relevant aspects.
- X. Taking advantage of and incorporating the possibilities of state-of-the-art technology and the advantages of technology to develop tools that serve to articulate effective

communication and optimize the economy of means, allowing Secuoya to be at the forefront of communication and transparency.

XI. Establishment of communication channels for reporting contrary behaviors and/or non-compliance with current legislation and internal regulations, including Secuoya's Code of Conduct.

XII. Adoption of measures to facilitate change management and resilience in the processes of digitization and technological transformation, ensuring that their effects do not hinder or harm shareholders, investors, or stakeholders relating to Secuoya.

XIII. Compliance with current legislation at the European level and Secuoya's internal regulations, especially the Ethical Code, the Board of Directors' Regulations, and the Internal Code of Conduct in Securities Markets, as well as the principles of cooperation and transparency with competent authorities, regulatory bodies, and administrations.

## 5. INTERNAL COORDINATION FOR THE DISSEMINATION OF PRIVILEGED AND RELEVANT INFORMATION

In order to ensure that the dissemination of privileged information, or other relevant information, occurs in accordance with legal requirements and under conditions of transparency, Secuoya has established the following rules for internal coordination:

- ❖ The classification of information generated within Secuoya as privileged information is determined by the Secretary of the Board of Directors. They are responsible for communicating it to BME Growth beforehand and, if necessary, drafting, reviewing, and sending it through Secuoya's established channels.
  - Until the information is published on the BME Growth website, it cannot be disseminated through any other means.
  - If the economic-financial, non-financial, and corporate information is considered privileged information by Secuoya, it will be communicated to BME Growth or any other competent body as stipulated in the paragraph above.
- ❖ All communication must be clear, comprehensive, quantified, complete, and truthful, as required by the nature of the information, so as not to mislead or deceive.
- ❖ When such information could disrupt the normal course of operations on Secuoya's

securities or jeopardize investor protection, Secuoya must communicate the relevant information to BME Growth prior to its publication.

- ❖ Secuoya, under its responsibility, may postpone the publication and dissemination of privileged information if it considers that it harms both its interests and its values and objectives, provided that the delay does not mislead or deceive and confidentiality of this information can be ensured.
  - In this scenario, a record and monitoring of any delays will be conducted, and these will be reported to BME Growth, each with its respective justification.
- ❖ Information generated within Secuoya may be communicated to shareholders, institutional investors, and the markets through any means that complies with this Policy, provided there is no doubt that it does not need to be communicated to BME Growth because it does not constitute privileged information or other relevant information, or when Secuoya has determined that communication of the information to the CNMV is not required.

### **5.1. Dissemination of economic and financial information**

The Audit and Control Committee oversees the process of preparation and assurance of Secuoya's financial information, including all data issued and generated of a financial or economic nature. The publication or public communication of this information must be validated by this body.

### **5.2. Dissemination of non-financial and corporate information**

The Non-Financial Information Statement (NFIS) is where Secuoya reports its management, providing detailed data and information on environmental, human resources, human rights, and sustainability issues. The Audit and Control Committee supervises the preparation of this report in compliance with current regulations. It is disseminated through the channels detailed below to shareholders, investors, BME Growth, and stakeholders via Secuoya's corporate website.

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

Secuoya disseminates and communicates its information to the market, its shareholders, institutional investors, and other stakeholders through various channels:

## 6.1. BME Growth

The first channel of information for Secuoya with its shareholders, investors, and the general markets is BME Growth. The information submitted to this organization and on its website, as well as that published on Secuoya's corporate website, becomes publicly disseminated. This information includes that which is considered privileged or relevant, periodic financial and non-financial information, and other corporate information in accordance with current legislation, namely:

- ❖ **Communications of Privileged Information and Other Relevant Information:** Secuoya communicates, in accordance with applicable securities market regulations and market abuse rules, any information that could significantly influence the prices of financial instruments or derivatives, or any information that must be made public by legal requirement or is deemed necessary to disclose due to its significance.
- ❖ **Information on results.**
  - **Semi-annual:** Information pertaining to the period between the start of the fiscal year and the last day of each natural semester, the content of which conforms to the applicable model as per current legislation.
  - **Annual Information:** Secuoya submits, in the form and within the deadlines required by current legislation, its Annual Accounts (including Individual and Consolidated Financial Statements and their Notes) and the Management Report (which includes the Non-Financial Information Statement, the Annual Corporate Governance Report, and the Annual Report on Directors' Remuneration), along with the External Auditor's Report.
  - Additionally, Secuoya makes available to shareholders through its website updated information annually regarding:
    - ✓ General information;
    - ✓ Relevant facts;
    - ✓ Financial information;
    - ✓ General Shareholders' Meetings;
    - ✓ Supplementary documents.

## 6.2. Corporate Website

The corporate website (<https://secuoyacontentgroup.com/investors/>) is one of the main channels through which Secuoya manages its relationships with all stakeholders, providing them with

relevant and interesting information, promoting their involvement in social life, reinforcing their sense of belonging, enhancing the Secuoya brand, and demonstrating commitment to the Group's mission and values. This contributes to transparency as a fundamental value that shapes Secuoya's relationships with the markets and the general public.

The information is simultaneously incorporated and permanently updated on the website. It is clear, comprehensive, complete, accurate, and truthful, in compliance with the principles of informational transparency required by the BME Growth.

### **6.3. General Shareholders' Meeting**

The Board promotes the informed and responsible participation of shareholders in the General Shareholders' Meetings, maintaining continuous contact and dialogue with proxy advisors, addressing their queries regarding the proposals to be voted on at the respective General Shareholders' Meetings, and providing them with necessary information to ensure that their voting recommendations are based on a real understanding of Secuoya and its circumstances.

In this regard, the Board adopts timely measures and guarantees to facilitate the General Shareholders' Meeting in effectively exercising its functions as provided by law and Secuoya's corporate governance principles, such as holding informative periodic meetings and articulating the Communication Policy through the Secretary of the Board.

Additionally, Secuoya monitors the policies and recommendations of these proxy advisors, in connection with international trends in corporate governance, and evaluates the recommendations and criteria issued by proxy advisors regarding corporate governance standards, taking into account the specificities of Secuoya and its environment, and in any case, the applicable regulations.

### **6.4. Shareholder Mailbox**

The Shareholder Mailbox serves as an open, permanent, and transparent communication channel with all shareholders and investors to strengthen their relationship with Secuoya and its companies, enabling them to remain informed and submit proposals regarding Secuoya's management.

Through this channel, and at all times, inquiries can be addressed via the email address [ir@secuoyacontentgroup.com](mailto:ir@secuoyacontentgroup.com), including:

- ❖ Questions, queries, suggestions, and frequently asked questions.
- ❖ Issues related to access to legal and corporate documentation.

- ❖ Conferring representation or voting remotely at the General Shareholders' Meeting electronically.
- ❖ Facilitating remote attendance or viewing of the General Shareholders' Meeting proceedings.
- ❖ Participation in other activities aimed at promoting shareholder involvement in the Company, in accordance with this Policy.
- ❖ Inquiries related to the ethical principles governing governance at the Group level or lodging complaints via the Shareholder Mailbox.

Shareholders and investors can also use this channel to exercise their right to information prior to the General Shareholders' Meeting, as provided by law, the Corporate Governance System, and as determined by the Board of Directors for each meeting.

Absolute priority will be given in a reasonable manner to the social interest and responding to inquiries and requests made by shareholders and investors in accordance with the law and internal regulations, particularly those that make up Secuoya's Corporate Governance System. Thus, in accordance with the principles of transparency, equality, and symmetry in the dissemination of information defined in the Corporate Governance Policy, responses and any other documentation provided by the Shareholder Office will be made available to the public on Secuoya's corporate website.

## 7. DISSEMINATION AND SUPERVISION

Secuoya will make this Policy publicly available on its website at all times, and it is the responsibility of the Board of Directors, supported by the Audit and Control Committee, to determine and oversee the manner in which it is implemented, as well as the communications that Secuoya carries out with shareholders, investors, voting advisors, and other stakeholders.

Likewise, the Supervisory and Control Body will verify that in the application of this Policy, the Company complies with the provisions of the Internal Regulation on Market Conduct and the Corporate Governance Policy and other internal regulations within its competencies.

## 8. VALIDITY AND APPROVAL

The Communication and Contact Policy with Shareholders and Investors of Secuoya, Grupo de

Comunicación, S.A., and its group of companies, was approved by the Board of Directors at its meeting on February 14, 2024, and made available to all personnel. It enters into force on the day of its approval and will remain in effect until its annulment is approved.