



**POLICY GOVERNING COMMUNICATION AND CONTACTS  
WITH SHAREHOLDERS, INSTITUTIONAL INVESTORS AND  
PROXY ADVISORS, AS WELL AS THE DISSEMINATION OF  
ECONOMIC-FINANCIAL, NON-FINANCIAL AND CORPORATE  
INFORMATION**

Corporate Policy

Approved by the Board of Directors at its meeting on the 25 of October, 2022.

LABIANA HEALTH, S.A.

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## **1. INTRODUCTION**

On February 18, 2015 the Board of Spain's National Securities Market Commission (CNMV) approved the Code for the Good Governance of Listed Companies in order for the country's listed companies to comply with the following criteria:

1. (a) to ensure the proper functioning of their governance and administrative bodies in order to guide them towards the highest levels of competitiveness;
2. (b) to generate trust and transparency for domestic and foreign shareholders and investors;
3. (c) to improve the internal control and corporate responsibility of Spanish companies; and
4. d) to ensure the proper segregation of functions, duties and responsibilities at companies, with the utmost professionalism and rigor.

The Code for the Good Governance of Listed Companies was revised in June 2020, with the CNMV approving an update of it and establishing, in its Recommendation number 4, the following:

*"The company shall define and promote a policy with regards to its communication and contacts with shareholders and institutional investors within the framework of their involvement in the company, as well as with proxy advisors, that fully respects the rules against market abuse and provides for the similar treatment of shareholders in the same positions. Likewise, the company shall render this policy public through its website, including information on how it has been implemented and identifying the interlocutors or persons responsible for carrying it out.*

*Without prejudice to the legal obligations governing the dissemination of privileged and other regulated information, the company shall also have a general policy regarding the communication of economic-financial, non-financial and corporate information through the channels it deems appropriate (the media, social networks or other channels) that helps to maximize the dissemination and quality of information available to the market, investors and other interest groups."*

Consequently, the Board of Directors of Labiana, within the framework of its general competence to determine the Company's general policies and strategies, has approved this policy governing communication and contacts with shareholders, investors and

proxy advisors, as well as the dissemination of economic-financial, non-financial and corporate information (hereinafter, the "Policy").

## **2. OBJECTIVE OF THE POLICY**

The objective of this Policy is to define and establish the general principles and criteria governing actions involving the communication of economic-financial, non-financial and corporate information through the channels deemed appropriate; and, specifically, any contact with shareholders and investors, whether of variable or fixed incomes; and socially responsible investors, and proxy advisors, paying special attention to the opinions and views of those shareholders and major investors not represented on the Board of Directors. All this is without prejudice to the legal obligations applying to the disclosure of privileged information, other relevant information, and other regulated information applicable to the Company, always in accord with the strictest principles of non-discrimination and simultaneity in said disclosure.

## **3. GENERAL PRINCIPLES OF ACTION**

It is the responsibility of the Board of Directors to establish and supervise the appropriate communication and relationship processes and mechanisms with shareholders, institutional investors, proxy advisors and the markets in general, respecting the rules against market abuse and providing for the similar treatment of shareholders in the same positions, while also serving to maximize the dissemination of high-quality information. In order to enhance its communication and transparency with its shareholders and investors, both domestic and foreign, as regards their involvement with the Company, the Board of Directors approves the following policy, based on the following general principles of action:

- Non-discrimination, simultaneity, transparency, veracity, immediacy, relevance, consistency and traceability in the dissemination of economic-financial, non-financial and corporate information, both mandatory and voluntary.
- The protection of the rights and legitimate interests of all shareholders, and equal treatment in the recognition and exercise of the rights of all those who are in the same position and are not affected by conflicts of interest.
- The promotion of the involvement of shareholders and investors in the Company, facilitating, in particular, their access to information related to the exercise of their rights.
- The use and establishment of dynamic communication channels and tools that favor an efficient communication between the Company and the market, investors and other stakeholders, generating knowledge, collaboration and relationships of trust between them.

The principles set out above shall apply to the information provided by the Company and to its communication with its stakeholders, such as shareholders, institutional investors, intermediary financial institutions, managers and custodians of the Company's shares or debt instruments, financial and non-financial analysts, regulatory and supervisory bodies, credit rating agencies, information agencies, proxy advisors, media and the like.

Without prejudice to the principles of equal treatment and non-discrimination, the Company may adapt its general and special channels of information and communication to the market, investors and other interest groups, depending on its various target groups.

#### **4. INTERNAL COORDINATION PROTOCOL FOR THE DISCLOSURE OF RELEVANT INFORMATION**

In order to ensure that the communication of facts or news that may be considered privileged information, or other information relevant to shareholders, institutional investors and the market, in general, occurs under conditions characterized by their transparency, symmetry and accordance with the provisions of the general principles of this policy, the Company has established the following internal coordination procedure:

I. If the privileged information generated at the Company might be classified as relevant, if there is any doubt as to its obligation to communicate it to BME Growth, it shall be incumbent upon the Secretary of the Board, in coordination with the Director of Investor Relations and Corporate Communication, and the Regulatory Compliance Unit, to determine whether it is necessary to notify BME Growth or not.

II. When the information is not considered relevant from the point of view of BME Growth's regulations, or its communication is not mandatory to comply with a legal obligation, the Company may disseminate it if it deems this appropriate in accordance with the principles set out in this Policy. In this case, the aforementioned information may be communicated to shareholders, investors, analysts and the markets, in general, by any means compliant with this Policy.

For these purposes, the Directorate of Investor Relations and Corporate Communication will be responsible for publishing the information referred to in this section.

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

##### **5.1 Website of BME Growth and other official bodies.**

The Company's first general channel of information to shareholders, investors and markets, in general, is the BME Growth website, which, in accordance with current

legislation, may be considered privileged or relevant information, financial and non-financial information of regular nature, as well as corporate information established by law. The information sent to BME Growth shall be considered disseminated and made public as soon as it is published on its website. This information must be concrete, truthful and complete, so as not to give rise to misleading or confusing interpretations.

The Company shall also disseminate information through other applicable channels established by other authorities and supervisory bodies, be they domestic or foreign.

## **5.2 Labiana's corporate website.**

Labiana will promote its corporate website ([www.labiana.com](http://www.labiana.com)) and, within it, the section called "Shareholders and Investors" as the Company's main and official communication channel with shareholders, investors and other interest groups, channeling through it all economic-financial, non-financial and corporate information that may be of interest. The clear advantages of this channel, in terms of promoting immediacy and simultaneity in the dissemination of information, as well as non-discrimination in access to it, are key when it comes to implementing transparent relations between the Company, financial markets and the general public. All communication of privileged information or other relevant information issued by the Company, as well as financial and non-financial information of regular nature, and corporate information established by law, will be posted simultaneously on the corporate website.

## **5.3 Investor Relations and Corporate Communication Department**

The Company's organization includes a specific Investor Relations and Corporate Communication area, whose mission is to design and systematically execute the Investor Relations Program for the transparent and bidirectional communication of strategic, operational, organizational and financial actions, by any textual, face-to-face or digital means, aimed at shareholders and potential investors, financial analysts, proxy advisors, stock exchanges, regulatory authorities of the capital markets and rating agencies, thereby contributing to the proper formation of the share price, and therefore, to the creation of value for its shareholders.

Therefore, the Investor Relations and Corporate Communication area, as a natural channel of dialogue between the Company and its set of shareholders, the community of investors and analysts, proxy advisors, and the market, in general, is responsible for coordinating, analyzing, and managing for the Company all contacts and relationships with these interest groups.

For the efficient execution of this task, the Directorate of Investor Relations and Corporate Communication will coordinate the communication between the different subsidiaries and the market to ensure that it is adequate, consistent and coherent at all times.

When deemed necessary, the area of Investor Relations and Corporate Communication will collaborate with those professionals at the organization that may be necessary or expedient to facilitate communication with shareholders, investors, analysts and the market in general, and give them a better understanding of the Company's business, its economic and financial evolution and its future perspectives, as well as to respond to any requests for information made.

The Investor Relations and Corporate Communication area, in the performance of its function, will gather the necessary information, to be communicated to the market, from the different divisions of the corporate center and the business units, thus ensuring the consistency and homogeneity of the information.

The Directorate of Investor Relations and Corporate Communication will be responsible for continuously and individually responding to the inquiries of analysts and Institutional Investors, for which an email address has been made available ([investors@labiana.com](mailto:investors@labiana.com)).

The Company, in its regular relations with the markets, organizes information meetings on the Company's progress, and other aspects of interest to analysts and Institutional Investors, so that they have adequate information about the Company. All this should be understood without prejudice to the Company's strictest respect for the principle of the equal treatment of all shareholders of identical status and who are not affected by conflicts of interest or competition.

#### **5.4 External communication**

The competences of the Investor Relations and Corporate Communication area include the responsibility to manage, among others, relations with the media and to prepare press releases in a coordinated manner with the pertinent areas, so as to guarantee that messages issued by the Company across its different media and channels are coherent and aligned. The different press releases and materials published by the company to facilitate the work of the media can be found on its corporate website at [www.labiana.com/en/news/](http://www.labiana.com/en/news/)

#### **5.5 Social media**

The expanding role of social networks as efficient digital communication channels between companies and their stakeholders is undeniable. Hence, in order to maximize the dissemination of its information, the Company deems essential the use, in addition to and as a complement to the previous channels, of social networks of broad acceptance, distribution, presence and followings, to communicate economic-financial, non-financial and corporate information, provided that the requirements established in the current regulations on the communication of privileged information, and other relevant information, are complied with, as well as any and all internal rules of the Company.

## **6. GENERAL SHAREHOLDERS' MEETING**

The Board of Directors will promote the well-informed and responsible participation by shareholders at the General Shareholders' Meeting, adopting to this end the appropriate measures so that the General Meeting exercises the functions inherent to it. To this end, the Company will make available to its shareholders, prior to the Meeting, those additional communication channels that may be appropriate, as well as any information that is legally required or, even if it is not, is of interest to them, and can be reasonably provided. It shall, likewise, respond with the utmost diligence to requests for information and questions submitted by Shareholders prior to or during the Shareholders' Meetings.

The Company may use the services of agencies, entities and financial intermediaries to improve the distribution of information among its shareholders and institutional investors.

The General Secretariat, supported by the Investor Relations area, will be responsible for maintaining a dialogue with the proxy advisors, responding to their questions in relation to the proposed agreements submitted to the General Shareholders' Meeting and providing them with the clarifications they deem appropriate.

## **7. POLICY OVERSIGHT**

The Audit and Control Committee is responsible for informing the Board of Directors of the regular supervision it carries out of the execution of the Communication and Contacts Policy with shareholders, institutional investors and proxy advisors, in this task drawing on the compliance unit and the Directorate of Investor Relations and Corporate Communication.

## **8. PUBLIC NATURE OF THE POLICY**

This Policy is of a public nature and will be permanently hosted on the Labiana website, in the Corporate Governance section, as will its subsequent modifications.

## **9. APPROVAL OF THE POLICY BY THE BOARD OF DIRECTORS**

In accordance with its supervisory duty, the Board of Directors of Labiana Health, S.A. signs and approves this Policy and assumes the responsibility arising from it.