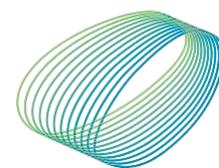


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General Policy of communication with Shareholders and Investors

General policy for communication of economic-financial, non-financial information, and contact with shareholders, institutional investors and proxy advisors



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Text approved by the Board of Directors

29/04/2021

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Introduction

Pursuant to the provisions of section 249.bis of the Capital Companies Act and section 6 of the Regulations of the Board of Directors, the Board of Directors of Arteche Lantegi Elkarte, S.A. (hereinafter "Arteche" or "the Company") has the power to approve the general policies and strategies of the Company and of the Group of which it is the parent company (the "Arteche Group") and, among others, the general policy for communication of economic-financial, non-financial information, and contact with shareholders, institutional investors and proxy advisors.

Based on the above, the Board of Directors of Arteche has agreed to approve this general policy for communication of economic-financial, non-financial information, and contact with shareholders, institutional investors and proxy advisors (the "Policy"), which shall be part of the Corporate Governance System and the Integrated Management Model of the Arteche Group.

Purpose

The purpose of this Policy is to establish a general framework for the communication of financial, non-financial and corporate information of the companies that make up the Arteche Group through the appropriate channels, that contributes to maximising the dissemination and quality of the information available to the market and its stakeholders (financial institutions, depository companies of the Company's shares, financial analysts, regulatory and supervisory bodies or credit rating agencies).

Likewise, the Policy defines the channels of communication and contact with shareholders and institutional investors within the framework of their involvement in the company, as well as with proxy advisors, with full respect for the rules of market abuse and the principle of equal treatment of shareholders who are in the same position. All this, without prejudice to the legal obligations of dissemination of inside information, other relevant information and any type of regulated information, applicable to the company.

Scope

The Policy is applicable both to the Company and to all the companies that make up the Arteche Group and extends to the directors, administrators, managers and employees of the Company and the Group involved in the formation and communication of financial, non-financial and corporate information, as well as in contact with shareholders, institutional investors and proxy advisors.

Basic Principles

The Board of Directors is responsible for the management and supervision at the highest level of the information provided to shareholders, institutional investors and the markets in general, protecting and facilitating the exercise of their rights within the framework of the defense of the social interest. The basic principles shaping the Company's relations with markets and the general public are as follows:

- a. Dissemination of information in a transparent, clear, truthful, homogeneous and simultaneous manner, which allows assessing the management and economic and financial results of the Group.
- b. Protection of the rights and legitimate interests of all shareholders and equal treatment in the recognition and exercise of the rights of shareholders who are in identical conditions and not affected by conflicts of interest.
- c. Promotion of continuous and permanent information to shareholders, and not only on the occasion of the convocation of the General Shareholders' Meetings, making available to them effective channels to facilitate the exchange of communication with shareholders and to ensure that they are constantly informed about the proposals that may be made in relation to the management of the Company.
- d. Use of new technologies and promotion of new forms and possibilities of communication.
- e. Compliance with the provisions of the law and internal regulations of the Group and the principles of cooperation and transparency with the authorities, regulatory bodies and competent administrations.

With regard to regulatory compliance, special account will be taken of the rules on the treatment of inside information and other relevant information in relations with shareholders and in communication with the markets contained in the Regulations of the Board of Directors, the Internal Rules of Conduct in matters related to securities markets, the Code of Ethical Behavior, all of them of the Arteche Group.

General information and Communication channels

Website of BME Growth and other bodies

The Company's first general channel of information and communication to shareholders and the markets is BME Growth, as well as, where appropriate, the channels established by other bodies (Alternative Fixed Income Market, for example).

By means of notifications of inside information and other relevant information, the Company makes public through the website of BME Growth and other competent official bodies, where appropriate, that information that must be made public in accordance with the applicable legislation.

Company's Corporate website

The Company has a corporate website in accordance with applicable legislation, permanently updated (www.arteche.com) which, together with the BME Growth website, is the Group's essential official communication channel.

Through the corporate website, within the "Shareholders and Investors" section, the Company makes available to the public all notices made public through the website of BME Growth (or other bodies) simultaneously, as well as the rest of the information that the Company must make available to the public through its corporate website in accordance with applicable legislation. Thus, the Company will publish in this section the notices of the meetings of the general meeting of the Company, the periodic financial information of the Company and the Group, internal regulations of the Company and information on corporate governance, sustainability and stock market matters, among others.

The economic-financial information and the institutional and general information of the Company, after having been sent to BME Growth (or other bodies) whenever mandatory, is disseminated through its transmission to financial analysts, institutional investors, media and information agencies, where appropriate.

In addition, the Company keeps permanently updated on its corporate website the calendar of dates for publication of results of the corresponding periods, the calendar of dividend payment and announces meetings with analysts and investors well in advance.

In addition to the above information, the Company also makes available to the public on its corporate website such other information it believes may be of interest to its shareholders, institutional investors and proxy advisors and other stakeholders.

General Shareholders' Meeting

The Board of Directors undertakes to promote the informed and responsible participation of shareholders in the General Shareholders' Meeting and adopts all appropriate measures to facilitate the effective exercise of its functions by the General Meeting.

On the occasion of the call of the General Shareholders' Meeting, the Company may use the services of intermediary entities for a better distribution of information among its shareholders and investors and, with the support of the investor relations area, may adapt the means and instruments of remote delegation and voting to the characteristics of investors.

Intermediary entities must inform the holders of the shares of the rights they can exercise and be responsible for ensuring that the instructions they transmit to the Company on behalf of their clients are valid and faithfully coincide with those received from the holders or representatives of the deposited shares.

Additionally, from the publication of the notice of convocation and, at least, until the end of the Shareholders' Meeting, the Company must publish continuously on its corporate website the information required by law and the Corporate Governance of the Company.

Social Media

Through social networks, the Company regularly publishes news on the activities and progress of the Company's business, initiatives in the field of sustainability or information on current issues related to the sector in which the Group operates, thus generating a recurring and fluid interaction between the Company and the different stakeholders.

Ethical Channel

The Company has an ethical channel supervised by the Audit and Compliance Committee that allows employees and other persons related to the Company (directors, shareholders, suppliers, contractors or subcontractors ...), to report irregularities of potential significance, including financial and accounting irregularities, or of any other nature, that they notice within any company of the Group.

The rules of operation of the aforementioned ethical channel as well as the procedure for managing the infringements that have been detected are permanently available on the corporate website and cover the verification of possible breaches of the Code of Ethical Behavior of the Arteche Group, the legislation or the internal regulations of the Group.

This channel guarantees confidentiality and in the aforementioned procedure cases are foreseen in which communications can be made anonymously, respecting the rights of the whistleblower and denounced.

Investor Relations

The company has an investor relations area that will be the communication channel responsible for managing the relationship, communication and, where appropriate, providing information to shareholders and investors, including institutional investors, and has been created as a personalized service to guarantee them a full knowledge of the Company that allows correct decision-making. Contact details can be found on the corporate website (www.arteche.com).

The queries received are dealt with on a regular and individualized basis by the Company's investor relations area, giving absolute priority to the social interest and respecting the Law and the Corporate Governance System of Arteche.

Likewise, informative meetings will be organized on the progress of the Company or other aspects of interest to shareholders, investors and analysts, in order to provide them with adequate information about the Company. All this should be without prejudice to strict respect by the Company for the principle of equal treatment of all shareholders who are in identical conditions and who are not affected by conflicts of interest.

The Company shall ensure that the dissemination of information carried out within the framework of the Policy complies with the principles set forth therein and with the provisions of the applicable legislation and internal regulations of the Company (and, in particular, in the Internal Rules of Conduct in matters related to securities markets).

Policy monitoring, approval and dissemination

Monitoring

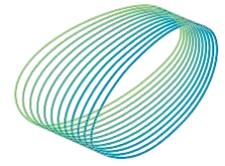
This general policy for the communication of economic-financial, non-financial information, and for contact with shareholders, institutional investors and proxy advisors has a vocation of permanence, and it is the responsibility of the Board of Directors, through its Audit and Compliance Committee, to ensure compliance by the entire Arteche Group, for which the necessary internal control mechanisms will be established.

The Audit and Compliance Committee will periodically review the content of this Policy, and will propose to the Board of Directors the modifications that contribute to its development and continuous improvement.

Approval and dissemination

This Policy is approved by the Board of Directors of Arteche at its meeting on April 29, 2021, date from which it enters into force.

To facilitate its knowledge by the interested parties and recipients of the same, this Policy will be published on the Group Portal.



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Moving together