



# TREATMENT OF INSIDE INFORMATION

Internal Regulations – Corporate Policies

Date: April 2022

Code: PC-04-5.2-06-202111

## Introduction

Approval of the Global DOMINION Access, S.A., (hereinafter “**DOMINION**”) Treatment of Inside Information Policy (hereinafter, the "Policy") is yet another milestone in DOMINION's steadfast commitment to lawfulness, ethics and professionalism that underpins how it conducts its operations and its corporate culture.

Pursuant to this Policy, DOMINION is firmly committed to:

- | Complying with and fully adhering to all current legislation (both nationally and in the countries where it operates).
- | Complying with the principles that govern its Code of Conduct which forms the basis of the Policy set out here.
- | Training and raising awareness of the Obligated Parties (as this term is defined below), as well as stakeholders, of the importance of complying with this Policy.
- | Applying penalties for non-compliance with the provisions set out herein, pursuant to the applicable disciplinary measures.

This DOMINION policy sets out the rules and security measures for the safe keeping, filing, access, reproduction and distribution of Inside Information, as defined below.

DOMINION has Internal Conduct Regulations regarding the Stock Market, the purpose of which is to develop the Policy and regulate the rules of conduct that the Company, its management bodies, employees and representatives must observe in their actions related to the stock market.

## Scope of application

The Policy applies to all employees, managers and directors of all the companies that make up DOMINION (hereafter "**Obligated Parties**") and that have access to Inside Information.

For the purposes of this Policy, "DOMINION" shall also mean all companies which Global DOMINION Access, S.A. controls or may control, directly or indirectly, with control being understood to be:

- (i) holding the majority of the voting rights;
- (ii) the right to appoint or remove a majority of members of the Board of Directors; or
- (iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Likewise, all third parties who have dealings with DOMINION will also indirectly receive this document and, whenever possible, must be made aware of the underlying principles and values.

## About Inside Information: Affected securities

The securities of financial instruments to which the provisions of the Policy are applicable (hereafter “**Affected Securities**”) are:

- | The transferable securities issued by DOMINION that are traded, or their admission to trading has been requested, in the stock exchange or in other regulated or non-regulated markets or systems, whether in Spain or abroad.
- | Financial instruments and contracts of any type that grant the right to the acquisition of the above securities, including those that are not traded in secondary markets.
- | Any other security, financial instrument or contract of any type, traded or not in the secondary market, whose underlying security are the securities or financial instruments listed in the above paragraphs.

## Concept of Inside Information:

For the purposes of the Policy, Inside Information is considered as all that information that meets the following requirements, unless the applicable legislation establishes stricter requirements:

- | Is specific in nature.
- | Has not been made public.
- | Refers, directly or indirectly to the Affected Securities, to other similar securities issued by issuers external to DOMINION, or the issuers from one another.
- | If made public, it may significantly influence the prices of the aforementioned securities or, if applicable, of derived financial instruments related to them, and whenever dealing with information that can be reasonably be expected to be made public or must be made public.

Notwithstanding the above, Inside Information includes but is not limited to the following:

- | DOMINION Profit and loss account.
- | Extraordinary changes to these profits and losses or changes to earnings guidance made public.
- | Operations that this company may make such as increases in capital or securities issues.
- | Significant divestments, acquisitions or mergers.
- | Events that may give rise to litigation, disputes or sanctions that may significantly affect its forecast profits and losses.
- | Authority decisions prior to their public knowledge.

Information is no longer considered Inside Information at the time it is made public or no longer meets the requirements set out above and, therefore, the possibility of influencing the price of the Affected Securities.

## Prohibited Acts of Conduct

The Obligated Party that possesses any form of Inside Information, who knows or should have known that they were dealing with this type of information, must refrain from carrying out, on their own behalf or of another, directly or indirectly, the following conduct:

- | Acquiring, transferring or assigning, on their own behalf or third party, the Affected Securities or any other security, financial instrument or contract of any type, traded or not on a secondary market or any other security which has the above securities underlying it, to which the Inside Information refers. Also considered as an operation with Inside Information is the use of this type of information to cancel or change an order relating to the security to which the information refers, when the order had been given before the person concerned had knowledge of the Inside Information. Furthermore, they must refrain from the attempt to carry out any of the above operations.

Excepted are (i) the preparation and carrying out of operations whose existence constitutes, in itself, Inside Information, (ii) the operations carried out to fulfil an obligation, now expired, of acquiring, transferring or assigning the securities mentioned in the previous paragraph, when this obligation is considered in an agreement made before any of the persons subjected to this Regulation is in possession of the Inside Information, and (iii) other operations carried out in compliance with the applicable regulations.

- | Communicating this Inside Information to third parties, other than in the normal exercise of their work, profession or job at DOMINION.
- | Recommending or inducing third parties to acquire, sell or transfer the affected Securities or any other security, financial instrument or contract of any type, traded or not on a secondary market or any other security that has the above securities underlying it, or to cancel or change and ordered relating to them, or get another to acquire, sell or transfer them or cancel or change an order relating to them, based on Inside Information.

When the person is a legal person, this item will also apply to physical persons who participate in the decision to acquire, assign or transfer, or cancel or change an order relating to securities on behalf of the legal person in question.

## Transmission of Inside Information to third parties

The transmission of Inside Information to those professionals and third parties who lawfully access this information for professional reasons (the “**External Advisers**”), must be restricted to those cases in which, in the judgement of the person responsible at DOMINION for the Inside Information, it is essential and the following should be borne in mind:

- | Inside Information must be transmitted to External Advisers as late as possible in accordance with the characteristics of the operation or transaction concerned.
- | Before any Inside Information is transmitted, the External Advisers must sign a confidentiality agreement with DOMINION in which they state that they understand and accept the confidential nature of the transmitted information; the obligations arising from the regulations applicable to the Inside information; the consequences of the breach of these regulations; and that they have the necessary means to ensure the confidential nature of the Inside Information. The above will not be applicable when the External Adviser is subject to a duty of secrecy due to their professional status. The signing of this confidentiality agreement is also required of those External Advisers (unless they are subject to a duty of secrecy due to their professional status) who are contacted in a preliminary phase and who are provided with the general lines of an operation or transaction in order to request financial or consultation offers, even though, finally, they do not participate in it.
- | In the case that Inside Information is transmitted to one or more External Advisers in the same firm or entity, the required confidentiality agreement in the above section must be signed with the corresponding firm or entity, which equally binds all the members of its organisation who have knowledge of the Inside Information.
- | The content and implications of the confidentiality agreement must be expressed verbally in a clear and precise way in the case of External Advisers who may not be familiar with the applicable legal regime.
- | In any case, the transmission of Insider Information by an External Adviser to another External Adviser in a different firm or entity requires prior and express authorisation from DOMINION and that this other External Adviser has signed a confidentiality agreement equivalent to that indicated above.
- | The department or person responsible for Inside Information within DOMINION may require the transmission in electronic format of the Inside Information to External Advisers to be encrypted or the protection of confidential documents through any computer procedure that restricts access to the Inside Information.

## Reporting Wrongdoings

All Obligated Parties and third parties have a Whistleblowing channel to report any conduct that may involve any wrongdoing or any illegal actions or any actions that go against the Code of Conduct or Policy. For further details regarding the Whistleblowing Channel, consult the [Code of Conduct](#).

## Document sheet

Document table:

Document Type	Code of Conduct
Document code	PC-04-5.2-06-202111
Date of the document	November, 2021

Prepared by:

Name or role	Remarks	Date
Risk & Compliance Department		November, 2021

REVISED BY:

Name or role	Remarks / Approved by	Date
Audit and Compliance Committee		

Table of Editions:

Version	Date	Description