



DOMINION

IR POLICY



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1. INTRODUCTION

This document sets out the policy relating to communication and relations with shareholders, institutional investors and proxy advisors and other stakeholders (the "Policy") of Global Dominion Access, S.A. (the "Company").

The Policy has been prepared in compliance with the provisions of recommendation 4 of the Good Governance Code published the National Securities Market Commission on February 18, 2015.

The Policy is applicable both to the Company and to the group of companies headed by the Company (the "Group"). Likewise, the Policy is applicable both to the communication and relations with shareholders, institutional investors and proxy advisors and to the communication and relations with other stakeholders (such as financial entities, management companies and depositories of the Company's shares, financial analysts, regulatory and supervisory bodies or credit rating agencies).

2. GENERAL PRINCIPLES

The communication and relations with shareholders, institutional investors and proxy advisors and other interested parties will be governed by the following general principles:

- (a) Compliance with the legislation and internal regulation of the Company that may be applicable and, in particular, in respect of market abuse matters.
- (b) Protection of the rights and legitimate interests of all shareholders and of the corporate interest.
- (c) Symmetry and equal treatment to all those who are within the same group of interest and are not affected by conflicts of interest.
- (d) Transparency, veracity, clarity, immediacy, continuity and bilingualism (Spanish and English) in the dissemination of the information
- (e) Constant improvement of communication and relations through collaboration with shareholders, institutional investors and proxy advisors and other stakeholders in the design and implementation by the Company of effective measures in this regard.

3. INFORMATION AND COMMUNICATION CHANNELS

(a) Stock Exchange National Committee (CNMV1) and other official bodies website
It is the main information and communication channel for shareholders, institutional investors and proxy advisors and other stakeholders and for all participants in the market in general.

By means of notifications of relevant information, the Company publishes on the CNMV and other competent official bodies website, if applicable, that information which must be disclosed in accordance with the applicable legislation.

(b) Company's Corporate website



The Company has a corporate website in accordance with the applicable legislation, permanently updated and available in English and Spanish.

Through the corporate website, within the "Investors and Shareholders" section, the Company makes simultaneously available to the public all notifications of relevant information made public through the CNMV website, as well as other information that Spanish listed companies must make available to the public through their corporate website in accordance with the applicable legislation.

Thus, the Company publishes on this site the calls for 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 and stock exchange matters.

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

(c) Social networks

Considering the business and the vocation of the Company, it wants to take advantage of the impact of new online information technologies and, for that purpose, is a user and has its own profile in different social networks (such as Twitter or LinkedIn).

Through social networks, the Company regularly publishes news about the activities and the progress of the Company's business, initiatives in the area of corporate social responsibility or information on current issues relating to the sector in which the Group operates, generating thus, a recurrent and fluid interaction between the Company and the different stakeholders.

(d) General meeting and electronic forum of shareholders

On the occasion of the meetings of the General Meeting of the Company, the Company not only makes available to its shareholders the information required by the applicable legislation and articulates the means of participation in the meetings provided for in the applicable legislation, but also seeks to reach the shareholder and favor the informed voting on the points of the agenda. The shareholders also have at their disposal an electronic forum before the date of each of the meetings of the general meeting of the Company.

Finally, during the holding of meetings, the chairman of the board of directors responds to the different questions posed by the shareholders during the question and answer section that is always on the agenda.

(e) Shareholder Relations Department

The Company has a Shareholder Relations Department, which is permanently available to shareholders, institutional investors and proxy advisors and other stakeholders, in order to respond to their questions and requests as soon as possible. The contact details are available on the corporate website and are the following:

Shareholder Relations Department

Address: Ibáñez de Bilbao, 28, 8, 48009 Bilbao

Telephone: +34 944 793787

Fax: +34 944 793783



Email: ir@dominion-global.com

The Shareholder Relations Department maintains regular contact with analysts, investors, and proxy advisors in the context of their activity. For example, the Shareholder Relations Department periodically organizes or participates in meetings and conferences with shareholders and institutional investors to discuss the progress of the Group's business, discuss the financial information presented by the Group and respond to requests for additional information, always respecting the applicable legislation regarding market abuse.

Likewise, on the occasion of the dissemination of the mandatory periodic information in accordance with the applicable legislation (intermediate declarations, intermediate financial statements and annual accounts), the Company organizes free-access audioconferences with the purpose of commenting on the results of the corresponding period. The celebration of said audio conferences and the data of telematic access are made available to the public by means of a notification of relevant information.

4. COORDINATION OF THE COMMUNICATION

The Company ensures that the dissemination of information made within the framework of the Policy complies with the principles set forth therein and with the provisions of the applicable legislation and the internal regulation of the Company (and, in particular, in the Internal Code of Conduct). For such purposes:

- (a) When the information is required to be communicated pursuant to the applicable legislation, the Compliance Officer will be responsible for communicating the information and publishing the corresponding notification of relevant information on the CNMV website. Said publication must comply with the provisions of the Internal Code of Conduct and be carried out simultaneously with its dissemination by any other means.
- (b) When the information is not required to be communicated pursuant to the applicable legislation, the Shareholder Relations Department will be responsible for evaluating whether or not it considers it appropriate to disseminate the information in accordance with the general principles set forth in the Policy. If so, the head of the Shareholder Relations Department will proceed to disseminate the information through any of the channels provided in the Policy.
- (c) Both the Compliance Officer and the head of the Shareholder Relations Department shall keep the other and the Chairman punctually informed of each one's actions, have a continuous and fluid dialogue and coordinate so that the provisions of the paragraphs above are complied with. Previous.

5. DISSEMINATION

The Policy will be published on the corporate website of the Company, within the "Investors and Shareholders" section.



6. CONTROL

The control over the application of the Policy will correspond to the Audit and Compliance Committee.

For this, it will monitor compliance, evaluate with the periodicity it deems appropriate whether the Policy is fit for purpose and propose to the board of directors the modifications it deems appropriate at each time in order to comply with its general principles.