

**LÍNEA DIRECTA ASEGURADORA, S.A.  
COMPAÑÍA DE SEGUROS Y REASEGUROS**



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**Policy for communication and contact with  
shareholders, institutional investors and proxy  
advisors**

(Including Policy for communication of economic-financial, non-financial and corporate information)

**Important information about this document**

Name of the Policy	<b>Policy for communication with shareholders, institutional investors and proxy advisors</b>
Related section of Línea Directa Group's Code of Ethics	6.9 Transparency of information 6.10 Reserved and Confidential Information.
Related sections of other policies	-
Rules and standards superseded	-
Rules and standards repealed	-
Related rules and standards	Code of Good Governance for Listed Companies
Business unit or function affected	Corporate Governance, Investor Relations, External Communications.
Personnel affected	-
Main person responsible for monitoring	Audit and Compliance Committee
Approved on	26 April 2021
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Version	1.0
Created by	Corporate Governance, Investor Relations, External Communication
Approved by	Board of Directors



## 1. Introduction

Following the recent listing of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros ("**Línea Directa**" or the "**Company**"), the Company intends to follow the best practices of good governance and the recommendations of the CNMV's Code of Good Governance, in order to strengthen its commitment to transparency, to the involvement of shareholders and investors and to the creation of long-term value. To this end, the Company considers it necessary to implement the necessary procedures to maintain adequate communication with all its stakeholders.

In this regard, the Board of Directors of Línea Directa, within the framework of its non-delegable power to determine the policies and strategies of the Company, approves this Policy for communication with shareholders, institutional investors and proxy advisors, which also includes the general policy regarding the communication of economic-financial, non-financial and corporate information through the media, social media or other channels of the Company.

## 2. Subject matter

The purpose of this Policy is to establish the framework for action and define the general principles that shall govern **(i)** the Company's communication with shareholders, institutional investors and proxy advisors and **(ii)** the communication of economic-financial, non-financial, and corporate information through the media, social media, or other channels in order to ensure transparency, the dissemination and quality of public information, the protection of investors and the orderly functioning of the market.

## 3. General principles

In accordance with internal rules and regulations, the Board of Directors, through its Audit and Compliance Committee, assumes the function of supervising that the information supplied to shareholders, institutional investors, stakeholders and the markets in general, is communicated through the appropriate channels, as well as supervising the application of this communication policy, all in accordance with the following general principles:

- a) Transparency, truthfulness, immediacy, relevance, completeness, consistency, traceability, symmetry and respect for the principle of equality in the dissemination of information, both mandatory and voluntary. Therefore, the Company should provide all information that may be of interest to shareholders and investors, facilitating its immediate publication and subsequent accessibility through the Company website.
  - b) Dissemination of complete, clear, objective, correct, truthful, homogeneous and simultaneous information that is not misleading or confusing.
  - c) Updating information according to environmental, regulatory and Company-specific factors. These information needs are also changing, making it necessary to re-evaluate them and keep them up to date.
  - d) Protection of the information to be communicated according to levels of confidentiality and access authorisations applicable to internal information.
  - e) Protection of the rights and legitimate interests of all shareholders. Equal treatment in the recognition and exercise of the rights of all shareholders who are on an equal footing and are not affected by conflicts of interest.
  - f) Encouragement of providing continuous information to investors, and not only on the occasion of the convening of General Shareholders' Meetings.
  - g) Maximising the dissemination and quality of the information available to the market, investors and other stakeholders through the implementation of a general communication strategy for economic-financial, non-financial and corporate information, through the information and communication channels envisaged in this Policy.
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- h) Compliance with the provisions of the law and Línea Directa's corporate governance regulations and the principles of cooperation and transparency with the competent authorities, regulatory bodies and public authorities.

In the dissemination of information as well as in communication with investors, Línea Directa shall be particularly mindful of the regulations on the treatment of insider information and other relevant information contained both in the applicable regulations and in the internal rules and regulations of the Company, in relation to shareholders and communication of information to the securities markets, contained in the Code of Ethics, in the Internal Regulations of Conduct in the Securities Markets and in the Regulations of the Board of Directors.

## 4. General information, communication and dissemination channels

In order to comply with the above principles and disseminate information correctly, Línea Directa shall use the following general channels:

➤ **Spanish National Securities Market Commission ("CNMV")**

Línea Directa shall make public on the website of the CNMV the privileged information and other relevant information under the terms established in current legislation, which will also be immediately included on the Company's corporate website.

The Corporate Governance department is responsible for determining the need to send a communication of insider information to the CNMV, as well as its drafting, review and authorisation to be sent through the authorised interlocutors designated by the Company for this purpose. The information to be communicated to the CNMV may not be disseminated by any other means without prior notification to the CNMV for publication on its website.

➤ **Línea Directa corporate website**

Línea Directa has a corporate website, [www.lineadirectaaseguradora.com](http://www.lineadirectaaseguradora.com), which offers extensive institutional, economic-financial and non-financial information on the Group's activity, results and information of interest to shareholders and investors, as well as all the information that, in accordance with the law and best corporate governance practices, must be included on the websites of listed companies.

Línea Directa's corporate website has, among other areas, a section for its shareholders and investors, the contents of which are updated periodically and, whenever possible, in Spanish and English, with the Spanish version prevailing in the event of discrepancies, following the standards established in the applicable regulations and in accordance with best corporate governance practices.

The information published on the Company's corporate website shall be kept available to shareholders and the general public for the period of time established by the regulations in force.

➤ **Media and social media**

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The Company endeavours to have an active presence on social media and in other media such as press, radio and television, where it disseminates information of interest on the activities of Línea Directa, complying at all times with its legal obligations of transparency, clarity and truthfulness in the dissemination of information and taking into account current legislation and CNMV guidelines in this area.

In all events, inside information or other relevant information may not be disseminated by any other means without prior publication on the website of the CNMV and without the prior authorisation of the General Secretary's Office of Línea Directa.

When the Company uses social media to communicate insider information, simultaneously, or as an additional or complementary channel to the CNMV, it shall meet the following requirements:

- (a) The information disseminated shall be complete, objective and clear, without the need to refer to sources beyond the original message in order to be fully understood.
- (b) The message shall be clearly marked "Insider Information" and will be separated from any promotional or marketing communication.
- (c) The issuer (full Company name) and the reporter will be clearly identified.
- (d) Communication will occur via a very widely used social network and from accounts with a very large following.
- (e) The Company shall communicate this information formally and accurately and shall not add or qualify any information in replies or conversations that is essential to understanding the information.

## **5. Specific information, communication and dissemination channels**

In addition to the general channels indicated in the previous section, Línea Directa has the following specific channels for dissemination and communication with shareholders, institutional investors and proxy advisors:

### **➤ General Shareholders' Meeting**

The General Meeting is the main channel for shareholder participation.

On the occasion of its general meetings, Línea Directa shall make available to its shareholders the information necessary to decide on the issues submitted for their consideration, publishing this information sufficiently in advance and with the detail required by law and best corporate governance practices.

Likewise, on the occasion of the general meetings, Línea Directa shall set up on its corporate web page the Electronic Shareholders' Forum, to which duly identified shareholders have access, in accordance with the Operating Regulations of this Forum, also published on the web



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site, by means of which communication between shareholders and the Company is facilitated under the terms of Article 539.2 of the Capital Companies Act.

Línea Directa shall also provide shareholders with the physical and electronic means necessary to exercise their rights at the General Shareholders' Meeting and shall broadcast the event live on the corporate website.

➤ **Shareholders' office**

Linea Directa Aseguradora has set up a contact mailbox (<mailto:accionistas@lineadirecta.es>) exclusively for attending to requests for information from the Company's shareholders. The address and telephone number of the Shareholders' office can be viewed on the corporate website, in the Shareholders and Investors section.

➤ **Investor Relations department**

Linea Directa has a specific department for shareholder and investor relations, which is a global function responsible for coordinating, analysing and managing relations and contacts with Linea Directa's shareholders and investors. It is therefore the natural channel of communication and dialogue between the Company, its shareholders and investors and the market in general on a regular basis, without prejudice to the other channels indicated in this Policy, for which purpose an email address is made available: [ir@lineadirecta.es](mailto:ir@lineadirecta.es).

The Investor Relations department will have, when deemed necessary, the collaboration of such persons in the organisation as may be necessary or appropriate to facilitate communication and meet the information requirements raised at any given time.

The Investor Relations department will obtain the necessary information for its communication to the market from the different areas responsible for its preparation in the Company, which shall ensure the consistency and homogeneity of the information.

The Board of Directors is regularly informed of the Company's main relationships with the Company's major shareholders, institutional investors and analysts.

➤ **Conferences and meetings with institutional investors and analysts**

Línea Directa's Investor Relations team shall maintain constant contact with analysts, shareholders and institutional investors (roadshows, conferences and other meetings), both in the form of individual and group meetings with current or potential institutional investors, to explain the Company's performance and other aspects of interest, attending to their comments and questions in a personalised manner.

Likewise, the Corporate Governance department integrated in the General Secretary's Office, together with the Secretary of the Board of Directors, shall organise information sessions with



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institutional investors to inform them about the Company's corporate governance systems, establishing a dialogue that allows the Company to learn about their concerns and, where appropriate, to improve its good governance practices.

All of the above should be understood without prejudice to the strict respect by Línea Directa of the principle of equal treatment of all shareholders who are in identical conditions and who are not affected by conflicts of competition or interest.

➤ **Streaming and conference calls to present results**

Linea Directa has set up a streaming channel to broadcast quarterly presentations of results and other communications relevant to the market, allowing shareholders, investors and anyone else who so wishes, to access them as another way of keeping up to date with the Company's progress. This channel is also available on a recorded basis and is accessible via the corporate website.

In particular, the results presentations, as well as any other relevant economic and financial presentations, are broadcast live in English on the Company's corporate website and interested parties are given the opportunity to ask questions. In this regard, Linea Directa endeavours to keep the retransmission of the complete event of each presentation of results accessible on the corporate website for a reasonable period of time.

➤ **Meetings with proxy advisors**

Línea Directa, through the Secretary of the Board of Directors, responsible for promoting corporate governance in the organisation under the guidelines of the Board of Directors, maintains regular contact and conversations with the main proxy advisors, in order to provide them with the most appropriate and up-to-date public information on the Company's corporate governance system, and to become aware of the most up-to-date voting policies and recommendations regarding the resolutions submitted to the General Shareholders' Meetings.

➤ **Whistleblowing channel / Ethics channel**

The aim of the ethics channel is to resolve doubts or concerns arising from inappropriate conduct or conduct contrary to the Code of Ethics of the Línea Directa Group and the Línea Directa Foundation, as well as the detection of possible breaches of regulations or unlawful conduct.

The whistleblowing channel is available via a link on the corporate website ([www.lineadirectaaseguradora.com](http://www.lineadirectaaseguradora.com)), in the Code of Ethics section, as well as on the commercial website ([www.lineadirecta.com](http://www.lineadirecta.com)).





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## **6. Internal information, communication and dissemination procedure**

Línea Directa has an internal procedure to ensure that the communication and dissemination of news that may contain inside information or other information relevant to the financial market is coordinated and is carried out in accordance with the principles set out in this Policy and in accordance with the provisions of the law and its corporate governance regulations, in particular the Internal Code of Conduct for Securities Markets.

Information generated by Línea Directa that may be classified as insider information, or other information relevant to the financial market, may not be disseminated by any other means without prior publication on the CNMV website, or in complementary form as provided for in this Policy.

In addition, the content of inside information or other relevant information disseminated to the market through any information or communication channel other than the CNMV must be consistent with the corresponding communication to the CNMV and must have prior authorisation of the Company's General Secretary's Office, in addition to complying with the rest of the dissemination criteria established in this Policy.

## **7. Monitoring and dissemination of this Policy**

The Audit and Compliance Committee of Línea Directa is responsible for periodically supervising both the content and application of this policy of information, communication and contacts with shareholders, institutional investors, financial analysts and voting advisors adopted by the Board of Directors.

This Policy must be published on the Company's website and updated as necessary.