

NEINOR HOMES, S.A. ORDINARY GENERAL SHAREHOLDERS MEETING 2023

DESCRIPTION OF SHAREHOLDERS' RIGHT TO INFORMATION

In accordance with article 518 of the consolidated text of the Capital Companies Law, approved by Royal Legislative Decree 1/2010 of 2 July proved by Royal Legislative Decree 1/2010 of 2 July (the "LSC"), as of the publication of the notice convening the general meeting and until it is held, the following documents and information, among others, will be made uninterruptedly available to shareholders on the corporate website of Neinor Homes, S.A. (the "Company") (www.neinorhomes.com):

- The notice of the meeting.
- The total number of shares and voting rights on the date of the notice.
- The full text of the proposed resolutions to be adopted, where appropriate, by the general meeting regarding each item on the agenda, and the corresponding reports by the board of directors and, if applicable, the board committees, which are legally required.
- The annual financial report for the financial year ended on 31 December 2022, including the individual and consolidated annual accounts, individual and consolidated management reports, the corresponding auditors' reports for said financial years and the declarations of responsibility of the directors.
- Statement on non-financial information and sustainability memorandum included in the consolidated management report of the Company including its subsidiaries for the year ended 31 December 2022.
- The annual corporate governance report for the financial year ended 31 December 2022.
- The annual report on the remuneration of the directors of the Company for the financial year ended on 31 December 2022.
- Articles of Association in force.
- Regulation of the General Shareholders' Meeting in force.
- The form or model of the attendance, proxy and remote voting card.
- Rules regarding the right to attend the general meeting and the rules for proxy and remote voting.
- Description of the shareholders' information rights.
- Rules of the Electronic Shareholders' Forum.

- Valid requests for information, clarifications or questions made by shareholders in the exercise of their right to information and the replies given by the directors.

Likewise, in accordance with articles 272 and 287 of the LSC, any shareholder may examine, at the registered office, and request the delivery, free of charge (which may be by e-mail with acknowledgement of receipt if the shareholder accepts such a procedure) the documents that are to be submitted to the general meeting for approval in the cases where this is legally required and, in particular, the annual financial report for the financial year ended on 31 December 2022, the reports issued by the directors and all other documentation that is required to be made available to shareholders for this general meeting.

In accordance with articles 197 and 520 of the LSC, from the day of the publication of the notice of the general meeting and until the fifth day prior to the date on which said meeting is to be held, inclusive, or verbally during the meeting, shareholders may request to the board of directors the information or clarifications they deem appropriate, or submit the written questions they consider relevant, with respect to the items included on the agenda.

Likewise, within the same advance notice and in writing or verbally during the general meeting, shareholders may request the clarifications they deem appropriate with respect to the publicly available information which the Company has provided to the Spanish National Securities Market Commission (*Comisión Nacional del Mercado de Valores*) since the last general meeting and with respect to the auditors' report.

Except in those cases expressly provided by the law, the board of directors will be obliged to provide the information requested in writing up to the day of the general meeting and, in the case of verbal requests for information made during the general meeting, when it is not possible to fulfil the shareholder's right to information at that moment, the board of directors shall be obliged to provide such information in writing within seven days following the conclusion of the meeting.

Requests for information may be delivered or sent through post to the registered offices of the Company (i.e., calle Ercilla 24, second floor, 48011 Bilbao (Spain); or electronically through the Company's corporate website (www.neinorhomes.com), in the place and in the manner established for these purposes.

Requests will be accepted if the electronic document requesting the information carries the legally recognized electronic signature of the shareholder, in accordance with the terms laid down in Law 6/2020, of 11 November, on certain aspects of trustworthy electronic services, provided that they are based on a recognized electronic certificate and there is no record of its revocation and which (i) is an Electronic User Certificate issued by the Spanish public certification body, CERES, of the Spanish National Mint (*Fábrica Nacional de Moneda y Timbre*) or (ii) is incorporated into the Electronic National Identity Card issued in accordance with Royal Decree 1553/2005, 23 December, which regulates the issue of National Identity Cards and electronic signature certificates.

Whatever the means used, the request of the shareholder must include their full name, together with proof of the shares held, by means of a copy of the attendance, proxy and remote voting card issued by the participating body in the Sociedad de Gestión de los Sistemas de Registro, Compensación y Liquidación de Valores, S.A.U. (“Iberclear”) or a certificate of ownership, whose purpose is to enable this information to be checked against the list of shareholders and the number of shares in their name provided by Iberclear, for the general meeting in question. The shareholder shall be responsible for providing proof that the request was sent to the Company in the corresponding format and within the appropriate deadline.

The Company’s corporate website (www.neinorhomes.com) contains detailed instructions for the exercise of shareholders’ right to information, in accordance with the provisions included in the applicable legislation.

Requests for information made by shareholders will be answered, if appropriate, once the identity and status as a shareholder of the applicant has been confirmed, prior to the general meeting, by the same means used to make the request, unless the shareholder indicates another preferred mean of communication. In any case, the information in question may be sent by certified mail with acknowledgement of receipt or by registered fax.

SPECIAL INFORMATION INSTRUMENTS

In accordance with article 539.2 of the LSC and the terms included in it, in order to facilitate communication of shareholders prior to the general meeting, an Electronic Shareholders Forum (the “Forum”) will be enabled with all due guarantees on the Company’s corporate website (www.neinorhomes.com), which may be accessed by all individual shareholders and any voluntary associations which might be constituted pursuant in accordance with the aforementioned article.

The Forum may be used to publish proposals to be presented as a supplement to the agenda included in the notice, to request support for such proposals, to present initiatives to achieve sufficient percentage to exercise minority right as provided in the law, as well as presenting offers of or requests for voluntary representation.

Access to the Forum and the terms and conditions of its use and operation shall be governed by the provisions included in the notice to the general meeting, this document and the rules for operation of the Forum, which may be accessed on the Company’s corporate website (www.neinorhomes.com).

PROTECTION OF PERSONAL DATA

The personal data provided by shareholders to the Company for the exercise of their voting, attendance or delegation rights at the general meeting or which are provided by the banks and stock agencies and companies in which the shares of the shareholders are deposited, through the entity responsible to keep the register of book entries, shall be processed by the Company, in its capacity as data controller, for the purposes of managing the development, fulfilment and control of the current relationships with

*This document is a translation of an original text in Spanish.
In case of any discrepancy between both texts, the Spanish version will prevail.*

shareholders, regarding the convening and holding of the general meeting, as well as in order to comply with legal obligations. The data may be communicated to the Notary who attends and draws up the minutes of the general meeting. The processing of data is necessary for the purposes indicated and its legal basis is your relationship as a shareholder as well as to comply with legal obligations. The data shall be kept for the duration of such relationship and, thereafter, for a period of six years only in order to be able to deal with any legal or contractual actions, unless, exceptionally, a longer limitation period would apply.

In case the attendance, proxy and remote voting card includes personal data referring to third parties, the shareholder must inform them of the points indicated herein in relation to the processing of personal data and comply with any other requirements which may be applicable for the proper assignment of personal data to the Company, without the Company having to take any additional action vis-à-vis the interested parties.

Registered Users may exercise their rights of access, correction, opposition, suppression, limitation of processing and portability, as well as any other rights recognized by current legislation on data protection, by sending a letter with the reference "Data Protection" (attaching a photocopy of the ID or identification document) in which your request is specified, addressed to the Company's data protection delegate, through the e-mail address, lop@neinorhomes.com, or at the registered office of the Company (i.e., calle Ercilla 24, 48011 Bilbao (Spain)). Registered users may also file complaints with the competent data protection control authority.

* * *