



December 2024

Annual Report 2024: Compliance with the Internal Code of Conduct in the securities markets



Neinor
H O M E S

**Neinor Homes, S.A.; Governance, Risk and Compliance, Internal Audit & ESG
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Activities related to ensuring compliance with Neinor Homes' Internal Code of Conduct in the securities markets

As established in the consolidated text of the Securities Market Law¹ and the Regulation of the European Parliament and of the Council on Market Abuse and its implementing provisions², and in accordance with the provisions of article 11 of the Audit and Control Committee Regulations and article 14 of the Appointments and Remuneration Committee Regulations, **Neinor Homes has established the Internal Code of Conduct in the securities markets** to define the rules of conduct that must be observed by the Company. **This code applies to all Neinor Homes employees, with particular emphasis on the members of the Board of Directors and Senior Management.**

Core content

- Rules of conduct regarding:
 - Transactions carried out on a party's own behalf
 - Inside information
 - Market manipulation
 - Treasury share transactions
- Correspondence records and register of activities
- Register of covered and associated persons
- Monitoring compliance with the Internal Code of Conduct

Approval

This Code was **approved by the Board of Directors** of Neinor Homes at its meeting on **March 6, 2017**. It was **updated on July 24, 2019**, and further **complemented by the general economic-financial, non-financial and corporate communication policy of April 26, 2017**, which was **updated on January 26, 2022**.

Scope of application

This Code shall **apply to**:

Covered Persons:

- Members of the company's Board of Directors.
- Company's Senior Managers.
- Secretary and Vice-Secretary of the Board of Directors.
- Managers and employees who perform duties in areas related to securities markets or who regularly have access to Inside Information and, in any case, individuals working in the financial, investor relations, legal and business development departments.
- Any other person designated by decision of the Secretary General.

Related Persons:

- Spouse or person deemed equivalent.
- Dependent child.
- Any other relatives who have lived with the Covered Person for at least one year prior to the date of a transaction.
- Any legal entity in which the Covered Person or the Related Person holds a management position or is responsible for its management; or any entity directly or indirectly controlled by such person; or created for their benefit; or whose financial interests are, to a significant extent, equivalent to those of such person.
- Any other individuals or entities designated with this status under the applicable legal provisions in force at any given time.

Annual Report 2024. Actions taken to ensure reasonable assurance

a

Insider list

Monitoring of the **register of persons with permanent access to inside information** and the **register of persons with access to inside information regarding a transaction or event**.

The Compliance Officer shall ensure **the insider list is always up to date** and shall **retain the data for at least five years** from the date of its creation or last update.



b

Signing of commitment letters of adherence

All covered persons (including Directors) **have signed** the following documents (**letters**), confirming their awareness of and acceptance of the obligations associated with their inclusion on the list:

Acknowledgment of NH's Code of Ethics and Internal Policies

Model for identifying related parties and conflicts of interest with NH

Acknowledgment of inclusion on the NH insider list

Declaration of adherence to NH's Internal Code of Conduct (RIC)

Criminal Record Certificate

Cybersecurity Notice for the Use of Portable and Mobile Devices

c

Training

Compliance training and awareness session in December 2024 for all Directors and employees.

The **Internal Code of Conduct in the securities markets** is included in the content covered during the compliance training.

Training contents

Who are the subject persons with access to privileged information and who should be included on the insider list
What is meant by Inside Information
Main obligations of persons subject to or with access to Inside Information
Protocol for the management and dissemination of Inside Information and other relevant information
Procedure for the management and dissemination of economic-financial and corporate information

d

Periodic review of employee shareholding

Periodic verification of ownership of Neinor Homes shares and acquisitions made by employees, to ensure compliance with reporting requirements for transactions in accordance with established procedures.

Verification of compliance with deadlines for reporting transactions after the date of the transaction (3 working days for persons with management responsibilities and 5 working days for all other covered persons, including their related persons).

e

Restricted activity periods for share transactions

Persons Discharging Managerial Responsibilities shall refrain from conducting any transactions during the **30 calendar days immediately preceding the public release of the Company's financial reports**.

The **Compliance Officer may expressly authorize them to carry out transactions during these periods**, provided it is demonstrated that the specific transaction cannot be carried out at any other time.

Disclosure Obligations

- ✓ **Persons Discharging Managerial Responsibilities and their Associated Persons**
- ✓ **Covered Persons, other than those referred to in the previous bullet, from the date they become Covered Persons**

¹ The regulation referred to is Article 225.2 of the consolidated text of the Securities Market Law approved by Royal Legislative Decree 4/2015 of October 23, 2015.

² The regulation referred to is Regulation No 596/2014 of the European Parliament and of the Council of April 16, 2014, on market abuse and its implementing provisions.