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NEINOR HOMES, S.A.

DESCRIPTION OF SHAREHOLDERS' RIGHT TO INFORMATION

In accordance with article 518 of the Spanish Companies Act, as of the publication of the announcement 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 Company's website (www.neinorhomes.com):

- The announcement of the calling of the General Shareholders Meeting.
- The total number of shares and voting rights on the date of the announcement.
- The full text of the proposed resolutions to be adopted, where appropriate, by the Ordinary General Shareholders Meeting of the Company 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 2020, 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.
- Articles of association in force.
- Regulations of the General Shareholders Meeting in force.
- The Regulations of the Board of Directors in force.
- The Annual Corporate Governance Report for the financial year ended 31 December 2020.
- The annual report on the remuneration of the directors of the Company for the financial year ended on 31 December 2020.
- The form or model of the attendance, proxy and remote voting card.
- Rules regarding the right to attend the General Shareholders Meeting and the rules for proxy, and remote voting.
- Description of the shareholders' information rights.
- The rules of the Electronic Shareholders Forum.
- Info-memo regarding the Corporate Social Responsibility Policy.
- 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.

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Additionally, in relation to item Eight on the agenda of the General Meeting regarding the approval of the merger by absorption of Quabit Inmobiliaria, S.A. by Neinor Homes, S.A. (the “**Merger**”), in accordance with that set out in articles 39, 40.2 and other relevant articles of Law 3/2009 of 3 April on structural changes to companies (“**Law on Structural Changes to Companies**”), it is hereby stated that the following documents have been published on the Company’s website (www.neinorhomes.com), so that they can be downloaded and printed, since 25 February 2021, except for (i) the joint merger plan (the “**Joint Merger Plan**”), which is published on the Company’s website since 12 January 2021; and (ii) the individual and consolidated financial statements as of 31 December 2018 and 2019 of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A., and their corresponding management reports and audit reports, the articles of association of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A., the articles of association of Neinor Homes, S.A. after the Merger and the identity of the directors of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A. and the date from which they hold their positions, which are published on the Company’s website since 23 February 2021:

- The Joint Merger Plan.
- The reports of the directors of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A. regarding the Joint Merger Plan, including the one signed by the directors of Neinor Homes, S.A., as part of its content, a report on the capital increase inherent to the Merger.
- The report from the independent expert designated by the Companies Register of Bilbao under the terms required by article 34 of the Law on Structural Changes to Companies.
- The individual and consolidated financial statements as of 31 December 2018, 2019 and 2020 of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A., and their corresponding management reports and audit reports (the individual annual accounts of both companies for the financial year ended 31 December 2020 include the merger balance sheets, together with corresponding audit reports);
- The articles of association of Neinor Homes, S.A. and Quabit Inmobiliaria, S.A., current and incorporated into a public deed.
- The articles of association of Neinor Homes, S.A. after the Merger, which will be the current articles of association, except for article 5 regarding the share capital figure that shall be amended as a result of the share capital increase required for the Merger exchange.
- The identity of the directors of the companies participating in the Merger and the date from which they hold their positions. It is hereby stated that no new directors will be proposed to join the board of directors of Neinor as a result of the Merger.

All shareholders, bondholders, holders of special rights other than shares and workers’ representatives who request this through any means allowed by law are entitled to examine at the registered office the full copy of the aforementioned documents and request the free delivery or shipment of copies of each one.

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Furthermore, it is hereby stated that the document foreseen in Article 1, sections 4.g) and 5.f) of Regulation (EU) 2017/1129, of 14 June 2017, on the prospectus to be published when securities are offered to the public or admitted to trading on a regulated market, which includes the pro forma financial reporting foreseen in such Regulation and annexes the related auditors' report regarding this information, will be available to the public sufficiently in advance of the General Meeting by way of publication on the website of the Company (www.neinorhomes.com), where it may be downloaded and printed.

In accordance with articles 272 and 287 of the Spanish Companies Act, 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) of 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 2020, the legally-required reports issued by the directors and all other documentation that is required to be made available to shareholders for this Ordinary General Shareholders Meeting.

In accordance with articles 197 and 520 of the Spanish Companies Act, from the day of the publication of the announcement convening the General Shareholders 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 deadlines 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 to the registered offices of the Company by post mail and to the attention of the Company to: Neinor Homes, S.A., calle Ercilla, 24, second floor, 48011, Bilbao, Spain; or electronically through the Company's 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 59/2003, of 19 December, on Electronic Signatures, 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

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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 card issued by the participating body in 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 website 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 Shareholders 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 Spanish Companies Act and the terms included in it, in order to facilitate communication of shareholders prior to the General Meeting, an Electronic Shareholders Forum will be enabled with all due guarantees on the Company's website, 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 announcement convening the General Shareholders Meeting, requests support for such proposals, 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 this document and the Operating Rules for the Electronic Shareholders Forum, which may be accessed on the Company's website.

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 Shareholders 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 shareholders,

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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 attending who will draw 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 (6) 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 or delegation 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 postal address Neinor Homes, S.A. – Calle Ercilla 24, 48011 Bilbao, Spain. Registered Users may also file complaints with the competent data protection control authority.

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