



# Policy for communication and contact with shareholders, investors and proxy advisers

Gestamp Automoción, S.A.

17 December 2018

## CONTENTS

1. Objective .....	3
2. Principles .....	3
3. General information and communication channels .....	4
3.1. National Securities Market Commission .....	4
3.2. Company website .....	4
3.3. Informative meetings (road-shows).....	5
3.4. Video calls and conference calls .....	5
3.5. Mailing lists.....	5
3.6. Social networks.....	5
4. Department for Investor Relations .....	5
5. Annual General Meeting.....	6
6. Approval .....	7

## 1. Objective

In accordance with the Regulations of the Board of Directors of Gestamp Automoción, S.A. (the "**Company**"), the Board is responsible for designing and implementing a policy for communication and contact with shareholders, institutional investors and proxy advisers. This policy will comply fully with market abuse regulations and ensure equal treatment for all shareholders of an equal status.

The objective of this policy (hereinafter the "**Policy**") is:

- To establish the governing principles for all communication and contact between the Company and its shareholders, institutional investors, proxy advisers and other interested parties, such as regulators and supervisors, financial intermediaries, management firms and depository institutions for Company shares, financial analysts, , ratings agencies, information agencies and similar parties ("the "**Interested Parties**").
- To define the communication channels provided by the Company for its shareholders, institutional investors, proxy advisers and other Interested Parties, in order to maintain efficient, transparent and continuous communication.

## 2. Principles

In line with the provisions of the applicable legislation, best practices for corporate governance and the Company's internal regulations, all communication with shareholders, institutional investors, proxy advisers, other Interested Parties and with the market in general, shall comply with the following principles:

- **Transparency, veracity, immediateness and homogeneity in the provision of information.** The Company shall provide all legally required information, as well as any additional information of interest, in a simple, efficient and clear manner. With a view to ensuring immediate and homogeneous access to information, the Company shall set up specific communication channels.
- **Continuous information.** The Company shall keep all shareholders and institutional investors informed of significant matters concerning the corporate group that may affect these parties.
- **Equal treatment of shareholders.** Equal treatment is guaranteed at all times for shareholders of an equal status in terms of information, shareholding and voting rights at the Annual General Meeting.
- **Protection of shareholders' rights and legitimate interests.** The Company shall foster active participation from all shareholders at the Annual General Meeting, facilitating the exercise of their rights and legitimate interests.
- **Compliance with the law, corporate governance recommendations and the Company's internal regulations.** All applicable legal provisions, corporate governance recommendations and the Company's internal regulations shall be complied with at all times, including the Regulations of the Board of Directors, the Annual General Meeting Regulations and the Internal Code of Conduct for Securities Markets.

### 3. General information and communication channels

The Company shall make the channels of information, communication and contact detailed in the subsections below available to shareholders, institutional investors, proxy advisers and other Interested Parties.

The use of such channels shall not imply in any case the delivery to the shareholders, institutional investors, proxy advisers or other Interested Parties of any information that may afford them a privileged or advantaged position over other shareholders. The Board of Directors, in coordination with the Investor Relations Department, shall specifically guard against any asymmetrical distribution of information, ensuring ongoing compliance with the principle of equal treatment of the Company's shareholders and with the applicable provisions regarding privileged and significant information, as established in the applicable legislation and the Company's corporate governance system.

The dissemination of information through the referred channels shall be carried out with full transparency and in compliance with the applicable laws and the Internal Code of Conducts for the Security Markets.

#### 3.1. National Securities Market Commission

The Company's first general information channel is Spain's National Securities Market Commission ("CNMV", Spanish acronym), as well as, when applicable, the channels set up by other foreign supervisory bodies, with the dissemination and public nature immediately acquired by the information sent to these institutions through publication of Significant Events on their websites, which shall be included simultaneously on the Company website.

#### 3.2. Company website

Another of the Company's main communication channels is the Company website ([www.gestamp.com](http://www.gestamp.com)), on which it publishes not only the legally required information for listed companies, but also any information deemed of interest in order to achieve the highest levels of transparency.

The information provided on the website is continuously and immediately updated and, wherever possible, published simultaneously in Spanish and English (the Spanish version takes precedence in the event of any discrepancy).

The "Investors and Shareholders" section of the website includes, among other content, the following information:

- **General information.** Information about the Company and its group, Significant Events published by the Company, share price, coverage by Company analysts, information about shareholders' agreements, distribution of dividends and public offers. Likewise, the "Investor Agenda" subsection also includes key information about the main events of the Company affecting shareholders and institutional investors, as well as other events of interest for the market such as dividend payments, publication dates for financial results, presentation of results and other matters of interest, including attendance at conferences with institutional investors.

- **Financial information.** Publication of results and related information, as well as information about the issue of bonds by the Company and its group.
- **Information about the Company's corporate governance.** Information about the Company's governing bodies and internal regulations (By-laws, rules and regulations, corporate policies).

### 3.3. Informative meetings (road-shows)

The Company organises informative meetings with shareholders, institutional investors and analysts in order to present the main aspects of its financial information, business developments and corporate strategy, as well as any other matters of interest for these groups.

### 3.4. Video calls and conference calls

The Company organises video calls and conference calls with shareholders, institutional investors, analysts and the general market in order to present the results of the corresponding period and other matters of interest. These video calls and conference calls are announced in the corresponding Significant Event and the "Investor Calendar" section of the Company website.

### 3.5. Mailing lists

The Company emails all parties to have requested this service the financial results, Significant Events and other information made public by the Company, immediately after the information is published by the CNMV.

### 3.6. Social networks

The Company maintains an active presence on social networks (Twitter, Facebook, LinkedIn, Youtube) through which it aims to provide information of interest about the Company and its group.

## 4. Department for Investor Relations

The Department for Investor Relations is a communication channel between the Company, its shareholders and institutional investors and other Interested Parties. Its main purpose is to respond to enquiries and information requests from these parties. In addition, the Investor Relations Department, in collaboration with the Office of the Secretary of the Board of Directors, answers enquiries from proxy advisers about proposed resolutions for the Annual General Meeting.

To this end, the Company provides shareholders, institutional investors, proxy advisers and other Interested Parties with the following communication channels:

- **Telephone number:** + 34 91 275 28 72
- **Email address:** investorrelations@gestamp.com
- **Postal address:** Alfonso XII, 16 28014 Madrid

## 5. Annual General Meeting

The Annual General Meeting is the main channel through which shareholders can participate in the governance of the Company. To this end, the Board of Directors shall foster informed and responsible participation from shareholders at the Annual General Meeting, adopting all measures deemed appropriate to ensure that this body can effectively perform its corresponding duties and functions.

These measures shall include, but are not limited to:

- **Provision of information from publication of the notice of meeting.** After the notice of meeting is published, all legally required information concerning the Annual General Meeting (including the resolution's proposals) shall be made available to shareholders and investors at the Company's registered address or on its website (<http://www.gestamp.com>). Alternatively, shareholders and investors may ask that this information be sent to them immediately and free of charge.

In addition, the Company may use the services of financial intermediaries, institutions or agencies to better distribute this information among its shareholders and investors.

- **Shareholders' Internet Forum.** An online forum for shareholders shall be provided on the Company website ([www.gestamp.com](http://www.gestamp.com)), which will be accessible with all due guarantees by both individual shareholders and voluntary associations of shareholders validly constituted in accordance with the law. The purpose of this forum is to facilitate communication prior to the Annual General Meeting.
- **Reports or clarification regarding items on the General Meeting Agenda.** From publication of the notice of meeting and up to five days before the date of the Annual General Meeting at first call, the Secretary of the Board shall respond to written requests for reports, clarifications or questions from shareholders or investors, regarding items on the Agenda. In addition, in the same term and manner, shareholders may request reports or clarification and submit questions in writing about any publicly available information provided by the Company to the CNMV since the last General Meeting. Likewise, the General Secretary's Office, in collaboration with the Department for Investor Relations, shall respond to enquiries from proxy advisers regarding proposed resolutions.

## 6. Approval

This Policy has been approved by the Board of Directors of the Company and any subsequent amendment thereof must be approved by such body.

This Policy shall be reviewed and updated whenever necessary to bring it into line with the Company's legal, corporate and financial position.