

Neinor Homes, S.A. (“**Neinor**” or the “**Company**”), in compliance with the reporting requirements provided for in article 227 of the Royal Legislative Decree 4/2015, of 23 October, approving the consolidated text of the Securities Market Act, hereby informs of the following

## OTHER RELEVANT INFORMATION

In accordance with the resolutions passed by the board of directors of the Company pursuant to the authorization granted by the general shareholders’ meeting of the Company on 1 April 2020 under item 16 of its agenda, it is hereby reported the commencement, effective 13 December 2021, of a Company’s shares buy-back program (the “**Buy-back Program**”) under Regulation 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (“**Regulation 596/2014**”) and Commission Delegated Regulation 2016/1052 of 8 March 2016 supplementing Regulation (EU) No. 596/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the conditions applicable to buy-back programs and stabilization measures (“**Delegated Regulation 2016/1052**”), in accordance with the following terms:

- (i) Purpose and scope: the Buy-back Program’s purpose is to reduce Neinor’s share capital through the redemption of own shares and, at the same time, to contribute to the remuneration of Neinor’s shareholders by increasing earnings per share.

For the purposes of the Buy-back Program, and in accordance with the Company’s Internal Code of Conduct and applicable law, treasury share transactions shall be considered to be those carried out, directly or indirectly, by the Company, and which involve shares of the Company, as well as financial instruments or contracts of any type, whether or not traded on the Stock Exchange or other organized secondary markets, which grant the right to acquire, or whose underlying is, shares of the Company.

- (ii) Term: from 13 December 2021 until 31 March 2022.

Nevertheless, the Buy-back Program will terminate before the end of the referred period upon acquisition of the maximum number of shares authorized by the board of directors or if the maximum monetary amount of the Buy-back Program is reached. Moreover, Neinor reserves the right to terminate the Buy-back Program before the end of the referred period if any other circumstance that makes it advisable occurs.

- (iii) Maximum monetary amount: up to 5,000,000 euros, provided that the maximum price per share may not exceed that provided for by article 3.2 of Delegated Regulation 2016/1052. In addition, the authorization for the acquisition of treasury shares granted to the board of directors by the general shareholders’ meeting on 1 April 2020 established (i) a minimum price for the acquisition corresponding to the lower of (a) the nominal value; and (b) the quotation price on the Continuous Market (*Mercado Continuo*) at the time of the acquisition minus 30%; and (ii) a maximum price equivalent to the quotation price on the Continuous Market at the time of the acquisition plus 30%.

The maximum monetary amount of the Buy-back Program may be reduced in the amount applied by the Company, during its term, to the acquisition of own shares in the over-the-counter market or off-market for the same purpose, which will be notified to the market whether in the periodic

other relevant information notices informing of the transactions carried out under the Buy-back Program or separately.

- (iv) Maximum number of shares to be acquired: 500,000 shares of the Company.

The maximum number of shares to be acquired under the Buy-back Program may also be reduced if, during its term, acquisitions of own shares in the over-the-counter market or off-market are carried out for the same purpose, which will be notified to the market whether in the periodic other relevant information notices informing of the transactions carried out under the Buy-back Program or separately.

- (v) Trading volume to be considered as reference: the trading volume to be taken as a reference for the purposes of the provisions of article 3.3 of Delegated Regulation 2016/1052 for the entire duration of the Buy-back Program shall be 25% of the average daily volume of Neinor's shares on the Continuous Market of the Spanish Stock Exchanges during the twenty trading days prior to the date of the purchase.

The Company shall communicate any amendment, interruption or termination of the Buy-back Program, as well as any acquisition of shares under it, to the market and to the Spanish National Securities Market Commission in accordance with article 5 of Regulation 596/2014 and with Delegated Regulation 2016/1052.

The Buy-back Program shall be lead-managed by Gestión de Patrimonios Mobiliarios S.V., S.A., that will manage the Buy-back Program by making its decisions regarding the execution of the acquisition of Neinor's shares and their price and volume conditions independently.

During the term of the Buy-back Program the transactions regulated under the liquidity agreement entered into between Neinor and Gestión de Patrimonios Mobiliarios S.V. S.A. on 22 September 2017 will be suspended, in accordance with Circular 1/2017 of 26 April, of the Spanish National Securities Market Commission, pursuant to the provisions of rule 5, section c). The aforementioned transactions will be resumed once the Buy-back Program ends.

In Madrid, on 10 December 2021