

Neinor Homes, S.A. (“**Neinor**” or the “**Company**”), in compliance with the reporting requirements provided for on 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 by the Company, effective 26 March 2021, of a share buyback program (the “**Buyback Program**”) under Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (“**Regulation 596/2014**”) and Commission Delegated Regulation (EU) No. 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 programmes and stabilisation measures (“**Delegated Regulation 2016/1052**”), in accordance with the following terms:

- (i) Purpose and scope: The Buyback Program’s purpose is to (a) 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; and (b) facilitate meeting the obligations arising from the share allocation programs for employees, executives and members of the management bodies of Neinor and its group companies.

For the purposes of the Buyback Program and in accordance with the Internal Code of Conduct of the Company 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 26 March 2021 until 26 September 2021. Nevertheless, Neinor reserves the right to terminate the Buyback Program if, prior to the aforementioned date, it has acquired the maximum number of shares authorized by the Board of Directors, if the maximum monetary amount of the Buyback Program has been reached or if any other circumstance that makes it advisable occurs.
- (iii) Maximum monetary amount: up to 10,000,000 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 value on the Continuous Market (*Mercado Continuo*) at the time of the acquisition reduced by 30%, and (ii) a maximum price equivalent to the quotation value on the Continuous Market at the time of the acquisition increased by 30%.

The maximum monetary amount of the Buyback Program may be reduced in the amount applied by the Company, during its term, to the acquisition of own shares in the block market or off-market for the same purpose, which will be notified to the market in the periodic other relevant information notices informing of the transactions carried out under the Buyback Program.

- (iv) Maximum number of shares to be acquired: 1,000,000 shares of the Company out of which the first 30,138 shares will be applied in accordance with the purpose referred to in item (a) of section (i) above and the following 969,862 shares to be acquired up to the maximum amount will be applied in accordance with the purpose referred to in item (b) of section (i) above.

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

- (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 Buyback 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 modification, interruption or termination of the Buyback Program and the acquisition of treasury shares under the Buyback Program to the market and to the Spanish National Securities Market Commission (CNMV) in accordance with article 5 of Regulation 596/2014 and with Delegated Regulation 2016/1052.

The Buyback Program shall be lead-managed by JB Capital Markets Sociedad de Valores, S.A.U., that will manage the Buyback Program by making its decisions regarding the implementation of the purchases of Neinor's shares and their price and volume conditions independently.

Any modification, interruption or termination of the Buyback Program and any acquisition of shares under it shall be communicated to the Spanish National Securities Market Commission pursuant to article 5 of Regulation 595/2014 and Delegated Regulation 2016/1052.

During the term of the Buyback 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 resume once the Buyback Program ends.

In Madrid, on 26 March 2021