

REGULATIONS OF THE ELECTRONIC SHAREHOLDERS' FORUM

1. Introduction

In accordance with the provisions of article 539 of the Spanish Corporate Enterprises Act (“CEA”), the board of directors of Ercros, S.A. (“**Ercros**” or the “**Company**”), at its meeting held on 15 May 2026, approved these Regulations of the Electronic Shareholders’ Forum of Ercros (the “**Forum**”), which shall be made available on the Company’s website (www.ercros.es) in connection with the holding of the next general shareholders’ meeting of the Company.

2. Regulations of the Forum

These regulations govern the creation and availability of the Forum by Ercros, and the guarantees, terms and conditions of access to and use thereof by Ercros shareholders and the voluntary associations that may be formed in accordance with the applicable regulations.

These regulations supplement, in relation to the Forum, the legal conditions of access to and use of the Ercros website.

Ercros reserves the right to amend, at any time and without prior notice, these regulations, the presentation, configuration, operation and content of the Forum, and its conditions of use, without prejudice to the provisions established by law.

3. Acceptance of the Forum rules

Registration as a Forum user, and access to and/or use thereof, implies full and unreserved acceptance of the terms and conditions of these regulations and of the legal conditions of access to and use of the Ercros website, in the version in force at any given time.

Registered users undertake to make diligent and proper use of the Forum in accordance with applicable law, these regulations and the requirements of good faith.

Ercros shall have the status of administrator of the Forum under the terms and with the powers established in these regulations, and reserves the right of interpretation in the event of doubt or discrepancy regarding the use thereof.

4. Purpose and scope of the Forum

The Forum shall be made available on the Ercros website uninterruptedly from the publication of the notice convening the general shareholders’ meeting until two (2) days prior to its holding, both dates inclusive.

The Forum does not constitute a communication channel between the Company and its shareholders and is made available solely for the purpose of facilitating communication among Ercros shareholders in connection with the holding of the aforementioned meeting.

Registered users may send, for publication on the Forum, communications exclusively relating to:

- Proposals intended to be submitted as a supplement to the agenda of the meeting notice.
- Requests for adherence to such proposals.
- Initiatives to reach the sufficient percentage required to exercise the minority right provided for by law.
- Offers or requests for voluntary proxy representation.

It is stated that, pursuant to article 519 of the CEA, article 11 of the articles of association and article 5 of the Regulations of the General Shareholders' Meeting, shareholders requesting the publication of a proposal as a supplement to the agenda of the notice convening the general shareholders' meeting must represent at least 3% of the share capital, duly evidenced.

The exercise of this right must be carried out by means of formal notice, which must be received at the registered office of Ercros within five calendar days following the date of publication of this notice, indicating: (i) the identity of the shareholders exercising such right; (ii) the number of shares they hold; (iii) a certificate of entitlement issued by the entity holding the shares in custody; (iv) the full text of the items to be included on the agenda, accompanied by the corresponding justification or, where appropriate, the text of the reasoned proposed resolutions relating to matters already included on the agenda; and (v) any other documentation deemed appropriate.

The submission of a proposal for a supplement to the agenda on the Forum shall in no event imply its acceptance nor, consequently, the amendment of the agenda announced in the notice convening the meeting.

Communications made or published on the Forum may not under any circumstances be construed as notice to Ercros and, in particular, for the purposes of exercising any right held by registered users, individually or collectively, nor may they replace the legal requirements for the exercise of such rights or for the implementation of shareholders' initiatives and actions. Any rights and powers that shareholders wish to exercise must be exercised through the legally established mechanisms, and the Forum shall not constitute a valid instrument for such purposes.

5. Registered users

Use of the Forum is reserved exclusively for individual shareholders of Ercros, as well as voluntary shareholders' associations duly incorporated and registered in accordance with article 539.4 of the CEA.

In order to access and use the Forum, every shareholder or voluntary shareholders' association must register as a “**user**” by completing the corresponding form, evidencing their status as an Ercros shareholder or as a duly incorporated and registered voluntary shareholders' association.

Corporate shareholders or voluntary shareholders' associations must evidence the authority of the person seeking access to the Forum on their behalf.

For subsequent access to and communications on the Forum, completion of a specific usage form may be required.

Use of the Forum by registered users shall be conditional upon maintaining the status of Ercros shareholder or duly incorporated and registered voluntary shareholders' association.

Should Ercros have reasonable doubts as to a user's compliance with these conditions, it may require such user to evidence compliance therewith and may request the submission of any information or documents it deems appropriate for verification purposes.

Ercros may request additional information and suspend or deregister users who fail to evidence compliance with the aforementioned conditions.

Communications made by shareholders who cease to hold such status prior to the holding of the meeting shall automatically lapse, as shall any communications related or connected thereto.

6. Access to the Forum and publication of communications

6.1. Access to the Forum

Any registered user shall have access to the Forum and may consult the communications made by other registered users.

Only communications made by registered users in relation to the matters referred to in section 4 above shall be published on the Forum, and the Forum shall not constitute a mechanism for electronic conversation among users or a virtual discussion platform. Accordingly, Ercros shall only incorporate into the Forum those communications that are appropriate in accordance with the law, and no other type of comment shall be published.

6.2. Publication of communications

Any registered user may submit communications regarding any of the matters referred to in section 4 above for publication on the Forum in accordance with the technical procedures established at any given time.

Communications shall be submitted exclusively in text format and, once published, shall be accessible to any other registered user.

Communications made by users are made in a personal capacity and, with the exception of duly registered shareholders' associations, communications received from shareholders' representatives, shareholders' groups and syndicates, custodians, financial intermediaries or other natural or legal persons acting on behalf of or in the interests of shareholders shall not be published.

Requests for publication of communications must be made using the forms available on the Forum, which shall include:

- Identification of the registered user, namely: name and surname(s), in the case of natural persons; corporate name, in the case of legal persons; and name and registration number in the commercial register, in the case of shareholders' associations, as well as, in the latter two cases, identification of their respective representatives.
- Subject matter of the communication, clearly indicating the content of the initiative.
- Brief justification of the communication.

Any communication published on the Forum shall include identification of the registered user submitting it and the date and time of publication.

6.3. Content of communications

The submission of a communication implies that the user responsible therefor declares and warrants that its content is lawful and that they hold the necessary authorisations and permissions to submit such communication.

Ercros reserves the right to verify whether the communications submitted comply with these requirements and may refuse their publication on the Forum or remove from the Forum any communication it considers not to comply therewith. Likewise, it may respond to communications made by registered users through the email address provided by them or by any other means of communication it deems appropriate.

The following communications are expressly prohibited:

- Communications that infringe the rights or legitimate interests of Ercros, other registered users or third parties, such as their intellectual and industrial property

rights, freedom of religion, honour, reputation and privacy, protection of personal data and any other rights or interests protected by law.

- Communications introducing information or personal data relating to third parties without the informed consent of the data subject or involving identity theft or impersonation.
- Communications including discriminatory, racist, sexist, violent, xenophobic or otherwise degrading or offensive content or expressions.
- Communications including inappropriate material or material contrary to the requirements of good faith.
- Communications providing information intended for the commission of criminal, civil or administrative offences.
- Communications involving actions, or providing information to third parties, enabling the circumvention of the technical restrictions that may be incorporated into the various media or programmes of the Forum in order to avoid unauthorised use.
- Communications including content or material without the due authorisation of the holders of the corresponding intellectual or industrial property rights.
- Communications damaging, disabling, overloading or impairing the operation of the Forum or the computer systems of Ercros, other registered users or third parties, as well as documents, files and any content stored on such computer systems (hacking), or preventing the normal use and enjoyment of the Forum by other registered users.
- Communications directly or indirectly including advertising or promotional content.

Any registered user who becomes aware that the content of the Forum, or content provided through the Forum, is contrary to the law, the rules established in these regulations or the requirements of good faith, may notify Ercros thereof through the contact mailbox referred to in section 11 below, without this implying any type of liability whatsoever for Ercros, even if no action is taken in this respect.

6.4. Removal of communications after the meeting

Once the general shareholders' meeting has concluded, Ercros reserves the right to remove and delete all communications from the Forum opened in connection therewith.

7. Liability

By accessing and/or using the Forum, every registered user declares that they are aware and accept that use of the Forum takes place, in all cases, under their sole and exclusive responsibility.

Users shall be liable for any damages that Ercros, another registered user or any third party may suffer as a consequence of improper access to and/or use of the Forum, including specifically the submission of communications.

Ercros, as administrator of the Forum, shall not be responsible for the accuracy, truthfulness, validity, lawfulness or relevance of the communications submitted by registered users, nor for the opinions expressed by them. The Company shall only be responsible for its own services and for content directly originated by it.

Ercros has the power, but not the obligation, to monitor the use of the Forum and its contents, which are the sole responsibility of the users. In any event, the Company may establish content filtering and moderation tools for communications, as well as remove content when it considers that such content may be unlawful or contrary to the rules established in these regulations or to the requirements of good faith.

8. Absence of licence

Ercros authorises registered users to use the software application installed on the Ercros server, or on the server of a third party providing the services comprising the Forum, solely for the purpose referred to in section 4 above and in accordance with the terms and conditions established in these regulations. Users must refrain from obtaining, or attempting to obtain, access to and use of the Forum and its contents by means or procedures other than those made available or indicated for such purpose in each case.

Ercros grants no licence or authorisation of use of any kind over its intellectual and industrial property rights or over any other property or rights related to the Forum.

9. Cost of use

Access to and use of the Forum by registered users shall be free of charge, except for the cost of the connection through the telecommunications network supplied by the access provider contracted by each user.

10. Security and protection of personal data

The provisions relating to security and protection of personal data contained in the legal conditions governing access to and use of the Ercros website shall apply to the Forum. In particular, Ercros shall process the personal data provided by registered users, or generated as a result of use of the Forum, solely for the purpose of establishing, managing

and supervising the operation of the Forum in accordance with these regulations and the applicable legislation.

Registered users expressly accept, authorise and consent to the Company publishing the contents of the communications submitted to the Forum. Likewise, they expressly accept, authorise and consent to the contents submitted by any registered user being visible to all registered users and to personal data being visible or accessible to any registered user as a means of identifying the author of the publication.

Registered users may exercise their rights of access, rectification, erasure and objection through the contact mailbox referred to in section 11 below.

11. Contact mailbox

Registered users who have suggestions or proposals for improving the Forum, who require technical assistance, who wish to report content not compliant with these regulations or who wish to exercise their rights recognised under personal data protection legislation, may contact the following email address:
foroaccionistas@ercros.es.

The purpose of this email mailbox is to provide assistance to registered users and to improve the quality of the Forum, without implying any type of control or liability whatsoever on the part of Ercros.

Mr Pere Kirchner Baliu
Non-member Secretary of the board of directors of Ercros

Barcelona, 15 May 2026

In the event of any discrepancy between the English and Spanish versions of this document, the Spanish version shall prevail.