Holaluz-Clidom, S.A.

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TO BME GROWTH

Barcelona, 31 August, 2026

Pursuant to article 17 of Regulation (EU) 596/2014 of the European Parliament and of the Council of 16 April, on market abuse, and article 228 of the consolidated text of the Law on Market Securities and Investment Services, approved by Royal Legislative Decree 6/2023 of 17 March and its concordant provisions, as well as Circular 3/2020 of the BME Growth segment of BME MTF Equity, Holaluz-Clidom, S.A. ("Holaluz" or the "Company") hereby discloses the following

INSIDER INFORMATION

Further to the Inside Information announcements published by the Company on 19 and 28 July, the market is hereby informed of the following:

By Decision of 16 July 2026 of the Director-General for Energy Policy and Mines, two separate administrative proceedings were commenced — one for the revocation of the Company's authorisation to carry on the activity of electricity supply, and one for the transfer of its customers to suppliers of last resort — and it was ordered that they be joined. The commencement of both proceedings was published in the Official State Gazette (BOE) of 18 July 2026.

These proceedings are governed by Article 47 of Law 24/2013 of 26 December on the Electricity Sector, as further developed in Articles 15 and 16 of Royal Decree 88/2026 of 11 February, approving the General Regulation on the supply, retail sale and aggregation of electricity.

The administrative proceedings commenced by the Ministry for the Ecological Transition and the Demographic Challenge arose from certain disagreements between the Company and some of its suppliers as to whether particular invoices were due and payable.

The reason for opening those proceedings was an isolated claim for payment of certain invoices by three suppliers (totalling €4,392,776.82, barely 3% of annual turnover in preceding years). As the competent regulator has held in its Decision of 28 August 2026, those facts do not constitute grounds for revoking Holaluz's authorisation to carry on the activity of electricity supply, nor for the transfer of its customers to proceed.

The cause of these proceedings was an isolated episode involving a claim for payment of certain invoices which (i) is not the product of any deliberate intention not to pay, and (ii) is not indicative of a financial position that would prevent Holaluz from meeting its obligations on a regular basis. It stems, on the one hand, from Holaluz's orderly and controlled treasury management, set against the daily invoicing practice of the distribution companies, whereby matured invoices are grouped together for payment at regular intervals as permitted by current legislation (see, in this regard, Article 4.2 of Law 3/2004).

On the other hand, the following should also be taken into account:

1. Royal Decree-Law 7/2026 of 20 March, approving the Comprehensive Plan in Response to the Middle East Crisis, introduced a temporary tax reduction for consumers, in force until 30 June, to mitigate the rise in energy costs. As a result, the cost of energy purchased at the higher tax rates fell to be borne by the Company: for a time, Holaluz had to purchase energy bearing VAT at 21% and then supply it to consumers charging only 10%. The refund due from the Spanish Tax Agency (AEAT) of the difference between input and output VAT for those months will resolve this temporary tax discrepancy.
2. The increase over the last financial year in what are termed "demand-related costs" has had an adverse effect on the retail supply business.

That said, the Company has reported to the Regulator all recurring payments made and is up to date with its obligations to its logistics suppliers (the distribution companies).

As reported on 28 July, the Company filed its submissions in the administrative proceedings on that date, and these were successively supplemented with evidence of the recurring payments being made, as set out above.

As at the date of this announcement, the invoices claimed, together with those issued subsequently, have been settled in full.

The Company reports that it has settled the amounts relating to those invoices and to subsequent ones out of its own business operations, with no need for external financing, capital increases or shareholder contributions. This confirms that, as explained above, the matter was an isolated one, and any financial consequences for the Company arising from these payments can be ruled out.

The Company's Board of Directors has kept these proceedings under continuous review and will continue to monitor the timely payment of its logistics suppliers.

In light of all the foregoing, on Friday 28 August 2026 the Ministry served on Holaluz the following DECISION (published in the BOE the following day):

"**First.** To conclude the proceedings for revocation of the authorisation and, by delegation from the Third Vice-President of the Government and Minister for the Ecological Transition and the Demographic Challenge, the proceedings for the transfer of the customers of HOLALUZ-CLIDOM, S.A. (R2-408) to a supplier of last resort, and to order that both be closed.

Second. To serve this Decision on HOLALUZ-CLIDOM, S.A.

Third. The interim measures adopted in the decision of 16 July 2026, by which the proceedings for revocation of the authorisation to carry on the activity of electricity supply of HOLALUZ-CLIDOM, S.A. (R2-408) were commenced, together with the proceedings for the transfer of its customers to a supplier of last resort, shall cease to have effect upon service of this Decision.

Fourth. To communicate this Decision to the National Markets and Competition Commission (CNMC), as well as to Red Eléctrica de España S.A., the Iberian Energy Market Operator, Spanish Pole, S.A. (OMIE), the distributors and the suppliers of last resort.

Fifth. To order the publication of the notice of this Decision in the Official State Gazette (BOE).

In compliance with the provisions of the BME MTF Equity Circular 3/2020, it is expressly stated that the information provided has been prepared under the exclusive responsibility of the Company and its directors.

Carlota Pi Amorós
coFounder and CEO
HOLALUZ-CLIDOM, S.A