

BILATERAL CONTACT POLICY CM.COM N.V.

1 INTRODUCTION

- 1.1 The management board (the "**Management Board**") of CM.com N.V. (the "**Company**") has adopted this bilateral contact policy (the "**Bilateral Contact Policy**") on 15 March 2021. The Bilateral Contact Policy sets out the rules regarding bilateral contact between the Company and its shareholders. This Bilateral Contact Policy has been established in accordance with the best practice provision 4.2.2 of the Dutch Corporate Governance Code (the "**Code**"). The previous (initial bilateral contact policy was adopted on 21 February 2020. The Bilateral Contact Policy is published on the website of the Company.
- 1.2 The purpose of this Bilateral Contact Policy is to explain the strategy and performance of the Company and to ensure that correct, clear, accurate, reliable and adequate information is provided about the Company and its group.

2 BILATERAL CONTACT

2.1 General

The Company is committed to maintaining an open and constructive dialogue with its shareholders and strives to improve relations with its shareholders on a continuous basis. For the sake of this open and constructive dialogue, the Company aims to keep shareholders updated by informing them equally, simultaneously, clearly and accurately about the strategy and performance of the Company and other information that could be relevant for investor decisions. The Company will always act in compliance with applicable rules and regulations, including provisions on price-sensitive information, fair and non-selective disclosure and the equal treatment of shareholders. The Company will also, for the sake of transparency, provide information via management reports, interim reports, press releases and its website.

2.2 Bilateral contact

- 2.2.1 Dialogues with shareholders of the Company will primarily take place in general meetings, but may also be held on a bilateral basis.
- 2.2.2 All requests from shareholders to enter in a dialogue will be taken into consideration. The Company will determine at its sole discretion whether it will accept such a request. The Company reserves the right to accept invitations only for those dialogues where the Management Board and / or the supervisory board of the Company (the "**Supervisory Board**") deem this to be in the interest of the Company. The initiative to enter into a conversation with a shareholder can also be taken by the Company.
- 2.2.3 The Company may request a shareholder to provide certain written information prior to a bilateral conversation in order to assess whether a dialogue outside a general meeting would be in the interest of the Company. This information may include the objective and the subject of the dialogue, the shareholder's view on the subject, the shareholder's interest in the Company and any other clarification required to assess the request for bilateral contact.
- 2.2.4 The Company is generally represented by its Investor Relations Manager and/or Officer during these interactions. However, in a limited number of occasions, one or more Managing Directors or other members of the executive committee of the Company may accompany the Investor Relations Manager and/or Officer. The subject matter of bilateral communications ranges from individual queries from shareholders to more elaborate discussions following Company disclosures.

2.2.5 In principle, the Company will hold no meetings with any shareholder during silent periods. Silent periods are generally considered to be (i) the periods commencing thirty calendar days prior to publication (the day of publication included) of the corresponding annual and semi-annual financial statements and (ii) the period commencing 7 working days prior to publication (the day of publication included) of the corresponding quarterly results over Q1 and Q3

2.3 Price-sensitive information

The Company strives to only disclose publicly available information in bilateral contacts. In the event that non-public inside information is inadvertently disclosed during any bilateral contact, the Company will publicly announce such information as prescribed by applicable law.

3 MISCELLANEOUS

The Management Board is authorised to adopt, revoke and amend this Bilateral Contact Policy if it deems this necessary. The Management Board also retains the right to deviate from this Bilateral Contact Policy.

4 CONTACT

For any requests for contact with the Company or any further information or questions regarding this Bilateral Contact Policy, please contact Investor Relations, investor.relations@cm.com.