

CODE OF CONDUCT CM.COM N.V.

1 INTRODUCTION

This code of conduct (the "**Code of Conduct**") applies of CM.com N.V. ("**CM.com**" or the "**Company**") to all employees, temporary staff and people working on a contractual basis for CM.com and its subsidiaries (hereinafter the "**CM.com employees**").

The purpose of this Code of Conduct is to provide guidance to our employees to ensure they conduct their work with integrity, in the interests of CM.com and taking into account our core values. This Code of Conduct has been established in accordance with the Dutch Corporate Governance Code was adopted on 21 February 2020 and is published on the Company's website.

2 COMPLIANCE WITH LAW

CM.com employees are expected to act in compliance with applicable laws, rules, and regulations of the countries where we do business. In general the following principles are taken into account and CM.com regularly informs its employees on these topics:

Data Protection

CM.com must comply with all applicable regarding data protection and privacy. These include laws governing the collection, access, and use of data, such as the European Union's General Data Protection Regulation and national telecom legislation in the countries in which it operates.

Anti-Corruption

CM.com employees must comply with all anti-corruption laws of the countries in which we do business.

Money laundering

CM.com employees may not engage in money laundering and in providing payment services CM.com shall actively monitor to prevent or facilitate any activity where money obtained by illegal means is passed through a legitimate business to hide its true source.

Bribery and corruption

CM.com employees must not offer, pay, demand or accept bribes, kickbacks, facilitation or similar payments. In addition, employees must not make use of a third party to pay or accept bribes, , facilitation or similar payments.

Environmental Health and Safety

CM.com values environmental, health, and safety laws and strives to be a responsible employer offering healthy and safe working conditions and act responsibly in the communities where we operate.

Human Rights

CM.com employees must treat others equally, with care and consideration and respect for human rights. CM.com does not tolerate harassment or intimidation in any form. CM.com values diversity and shall not accept any form of discrimination.

3 INTEGRITY AND RESPONSIBILITY

CM.com and its employees act with integrity and in accordance with good business practice, especially when dealing with third parties. CM.com employees shall act responsibly and avoid any circumstance that would violate laws, the values of the Company and spirit of this Code of Conduct.

Behaviour employees

CM.com expects its employees to work with honesty, integrity, and with respect of others. High standards of personal behaviour must be observed in the relationships with colleagues as well as in dealings with suppliers, professional advisers, shareholders and other third parties. Employees are expected to be responsible for the performance and reputation of CM.com and to avoid any behaviour that might harm CM.com's performance or reputation.

Integrity in dealing with third parties

CM.com recognizes that in dealing with third parties (e.g. suppliers and other stakeholders) responsibility, reliability and integrity are essential preconditions. In this respect, CM.com will always act in good faith and expects from its employees to refrain from acts that may damage these preconditions.

Integrity in financial reporting

CM.com's accounting records and supporting documents shall accurately describe and reflect the nature of the relevant business and transactions. CM.com shall comply with generally accepted accounting rules and procedures at all times. No misleading or false entries may be made in its books or records. Correct information will at all times be provided to CM.com's auditors.

4 INSIDER TRADING

Under applicable securities laws, it is generally illegal to trade in CM.com securities while in the possession of material non-public information about the Company. It is also generally illegal to provide material non-public information about CM.com to others who then trade on the basis of that information. Please refer to our Insider Trading Policy, which is published on the Company's website.

5 COMPANY ASSETS AND CONFIDENTIAL INFORMATION

Employees are expected to respect high standards of personal behaviour in their use of CM.com equipment and assets. The personal use of equipment that belongs to CM.com is accepted provided that the equipment is not abused, that the employee takes all reasonable actions to prevent any theft of such equipment and the employee secures confidentiality of company information.

Employees must not use mobile phones, company cars and computers, and other company property for (i) illegal activities; (ii) inappropriate activities that can offend others or be harmful to the Company; and (iii) outside businesses or other personal gain.

Employees must ensure that all internal company information is kept confidential and protected and presented in accordance with applicable laws.

The protection of confidential information about the Company's business and developments is vital for its business, stakeholders and customers and ability to compete.

CM.com employees shall not disclose any confidential information, except when disclosure is authorized by the Company or as required by applicable law. Any confidential information may only be used for legitimate purposes.

6 CONFLICT OF INTEREST

A conflict of interest exists when personal interests interfere with the best interests of the Company. CM.com employees are expected to use sound judgment and to act, at all times and in all ways, in the best interests of the Company. Employees shall avoid actual or apparent conflicts of interest.

7 REPORTING

In the case that there are concerns about actions that may violate this Code of Conduct, every employee is obligated to report their concerns to their supervisor, so CM.com can address these issues, solve problems that may occur and remedy situations that may already have happened.