

**PLUXEE N.V.**  
**BILATERAL CONTACTS POLICY**

*Effective as of 31 January 2024*

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## **1 DEFINITIONS**

Capitalised terms used but not defined in this profile have the same meaning given to them in the board rules of Pluxee N.V. (the "**Company**"), as drawn up by the Board and posted on the Company's website.

## **2 INTRODUCTION**

2.1.1 This policy of the Company sets out the rules regarding bilateral contacts between the Company and its shareholders (the "**Policy**"). The Policy has been established in accordance with best practice provision 4.2.2 of the Dutch Corporate Governance Code.

2.1.2 This Policy is posted on the Company's website.

## **3 GENERAL**

3.1.1 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.

3.1.2 The Company will act in compliance with applicable rules and regulations, including provisions on inside 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 the Company's website.

## **4 BILATERAL CONTACTS**

4.1.1 Dialogues with shareholders of the Company will primarily take place at general meetings, but may also be held on a bilateral basis.

4.1.2 Requests from shareholders to enter into bilateral contact or, as applicable, in a dialogue will be taken into consideration. In principle the Company will facilitate these dialogues, although the Company reserves the right to accept invitations only for those dialogues where the Board deems this to be in the interest of the Company and its affiliated enterprise.

4.1.3 The initiative to enter into a conversation with a shareholder may also be taken by the Company.

4.1.4 Shareholders are expected to be prepared to enter into a constructive dialogue with the Company. If a shareholder enters into a dialogue with the Company

outside the context of a general meeting, the shareholder must disclose his full share position (long and short and through derivatives) at the request of the Company.

- 4.1.5 The Company may request a shareholder to provide certain written information prior to a bilateral contact 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 (long and short and through derivatives) and any other clarification required to assess the request for bilateral contact.
- 4.1.6 The Company is generally represented during these interactions either by a member of its Board its Chief Executive Officer, its Chief Financial Officer, and/or its Head of Investor Relations. The subject matter of bilateral communications ranges from individual queries from shareholders to more elaborate discussions following Company disclosures.
- 4.1.7 The Company may involve such other directors or employees of the Company and/or advisors as the Company deems appropriate.
- 4.1.8 In the 30 calendar days preceding the publication of its annual and half-year results, as well as the 15 calendar days preceding the publication of its revenues for the first and third quarter, the Company maintains so-called "closed periods" during which the Company does not communicate externally any financial information. The Company will in principle have no bilateral contact with any shareholder during those closed periods. Exceptions may apply, for example if such contact relates to publicly available information or factual clarifications of previous disclosed information.

## **5 PRICE-SENSITIVE INFORMATION**

The Company strives to only disclose publicly available information in bilateral contacts, excluding any non-public inside information. The Company will publicly announce such inside information as prescribed by applicable law.

## **6 MISCELLANEOUS**

The Board is authorised to adopt and may amend or supplement the Policy pursuant to a resolution to that effect. The Board may also approve temporary deviations from the Policy pursuant to a resolution to that effect.

## **7 CONTACT**

For any requests for contact with the Company or any questions about this Policy, please contact our Investor Relations department at [investors@pluxeegroup.com](mailto:investors@pluxeegroup.com).