

# Bilateral Contacts Policy

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Approved and adopted on 13 January 2023



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## Bilateral contacts policy

- 1.1 This bilateral contacts policy (the "**Policy**") is established in accordance with Clause 6.2(a) of the board rules of Flow Traders Ltd. (the "**Company**"). The Company is committed to maintaining an open and constructive dialogue with its shareholders. Conversations with shareholders, both in general meetings and on a bilateral basis, form an integral part of this dialogue.
- 1.2 The Company also engages in communication with analysts and investors (the "**Financial Community**") on a regular basis. Press releases, financial results releases, presentations, and briefing calls with analysts will be made available on the Company's website.
- 1.3 In addition, the Company frequently engages in direct shareholder contacts, typically through investor forums, road shows, broker conferences, company visits and telephone contacts. These contacts can be initiated by the Company, shareholders or representatives of the Financial Community and either take place with (large) groups of (potential) shareholders or on a 1-on-1 bilateral basis. The purpose of these meetings is to provide the Financial Community or (potential) shareholders, as the case may be, with information on the Company's business operations, activities, results, and strategy, all to the extent such information does not qualify as price-sensitive. During these meetings, the Company is generally represented by the IR department and/or the Company's board.
- 1.4 Silent periods are the periods prior to the publication of financial results during which in principle no meetings will be held with, and no presentations will be given to the Financial Community nor to shareholders. In principle, during silent periods no other communication with the Financial Community nor shareholders will take place, unless such communication would relate to factual clarifications of previously disclosed information. The length of the silent period is generally 4 weeks prior to the publication of annual results, 4 weeks prior to the publication of half-yearly results and 3 weeks prior to the publication of quarterly results. Silent periods differ from the formal open periods in which trading of the Company's common shares is permitted subject to the terms of the Company's Personal Transactions and Insider Policy, the Global Restricted Instruments Policy and any other policies of the Company that restrict the trading of the Company's common shares. Such open periods generally run for two weeks following the publication of the Company's annual, half-yearly or quarterly results.
- 1.5 The Company adheres to all legal obligations relating to price sensitive information and equal treatment of shareholders.