

Disclosure Policy - Ctac N.V.

This Disclosure Policy (hereinafter referred to as the “Policy”) concerning the disclosure of information is a written representation of the existing policy of Ctac N.V. (hereinafter referred to as the “Company”). The Company aims to provide complete, accurate, timely and consistent information to investors, analysts, relevant authorities, financial institutions, the press and other stakeholders of the Company. This Policy must be adhered to at all times.

Article 1. Introduction

- 1.1 The Company aims to achieve the following objectives with the establishment of this Policy:
- i. Compliance with the rules and obligations associated with the listing on NYSE Euronext Amsterdam
 - ii. Provide clarity on how information is published and discussed by the Company with investors, financial analysts and journalists
 - iii. Raise awareness among management and employees regarding obligations and practices related to information disclosure

Article 2. General Principles

- 2.1 As a listed company, the Company adheres to the obligation that all disclosures are truthful, accurate, generally accessible, and in line with all rules and obligations of NYSE Euronext Amsterdam and the Dutch Authority for the Financial Markets (AFM).
- 2.2 The provisions of Chapter 4 of the Dutch Corporate Governance Code concerning the General Meeting of Shareholders (hereinafter referred to as the “AGM”) are endorsed by the Company. Regarding information disclosure, the Company acknowledges the importance of transparent and equal information provision to shareholders, investors, analysts and the press.
- 2.3 In general, the Company aims for an active and open dialogue with stakeholders to provide a complete, accurate and unambiguous insight into both the historical results and future prospects of the Company.
- 2.4 This Policy applies to all employees of the Company, including members of the Board of Directors (hereinafter referred to as the “BoD”) and the Supervisory Board (hereinafter referred to as the “SB”), employees of subsidiaries, and any other person who is connected to the Company in a professional capacity (hereinafter referred to as “Employees”). For all Employees, this pertains not only to their activities within the Company, but also to any other activity that could impact the Company’s reputation (e.g., serving on the board of an industry association).
- 2.5 This Policy concerns all written and oral communications with members of the investment community and the media. The policy applies to both written statements (documents filed with the stock exchange regulator, annual reports, press releases, presentations and information on the website), oral statements (press conferences, group meetings and one-on-

one conversations with analysts, investors and/or journalists), as well as statements made through social media (e.g., Twitter or LinkedIn).

Article 3. Price-Sensitive Information

- 3.1 As a listed company, the Company is required to disclose price-sensitive information as soon as possible through a press release. Price-sensitive information is specific, non-public information that could significantly affect the share price. Examples include the announcement of results, important facts regarding strategy, capital and control of the Company.
- 3.2 The Company has a regulation concerning insider information (hereinafter referred to as the “Insider Regulation”) that prohibits Employees from disclosing insider information to third parties. If the confidentiality of price-sensitive information can no longer be ensured, the information will be disclosed immediately.

Article 4. Publication of Price-Sensitive Information

- 4.1 Information identified by the Company as price-sensitive is disclosed through a press release issued by the Company. Press releases are distributed to investors, analysts, journalists and news services via the AFM and Euronext and published on the Company’s website so that all stakeholders can access it simultaneously.
- 4.2 Press releases are always published in both Dutch and English. Press releases are preferably issued before or after market hours. Regular dates for the announcement of results are published in advance on the financial calendar on the Company’s website.

Article 5. Company Spokespersons

- 5.1 The responsibility for investor relations lies with the Chair of the BoD. The regular spokespersons for investor relations at the Company are the Chair and the CFO. In exceptional cases, another spokesperson may be appointed. Other Employees of the Company, apart from the aforementioned regular spokespersons, do not communicate with analysts and investors without prior permission and without the presence of the regular spokespersons. In the event of doubt about information to be disclosed, contact should always be made with the Chair.
- 5.2 Presentation materials for analysts and investors are made publicly available at the time of presentation on the Company’s website. Group meetings and one-on-one discussions with analysts and investors are based solely on publicly disclosed information and publicly released presentation materials. Press conferences are announced in advance on the website.
- 5.3 Contact with shareholders primarily occurs at shareholder meetings. For information on the calling and provision of the agenda and all other relevant documentation for these meetings, refer to the Company’s website.
- 5.4 The BoD and the SB provide the AGM with all requested information, unless a significant interest of the Company opposes this. If the BoD and the SB invoke a significant interest, this invocation will be justified.

Article 6. Quiet Periods

- 6.1 No publications are made before the release of financial results. During these quiet periods, meetings with and presentations to financial analysts, investors and the press are generally not held. Quiet periods coincide with closed periods during which trading in the Company's shares or debt instruments, or derivatives as described in the Insider Regulation, is not permitted.

's-Hertogenbosch, 4 October 2019

The Supervisory Board