

Benevolent^{AI}

1. INTRODUCTION

- 1.1 BenevolentAI (the “**Company**”) and its subsidiaries (together, the “**Group**”) are committed to providing timely, transparent, consistent, clear and accurate information to the public, in compliance with all applicable legal and regulatory requirements under the European Market Abuse Regulation ((EU) No 596/2014 (“**MAR**”), the Luxembourg Act of 23 December 2016 on market abuse, as amended and the Dutch Financial Supervision Act (*Wet op het financieel toezicht* (the “**DFSA**”)).
- 1.2 This disclosure policy (the “**Policy**”) outlines the procedures, which concern the Group, for identifying and disclosing Inside Information (defined below) to the market as and when required. This Policy applies to all officers, directors (including the board of directors of the Company) (the “**Board**”), and employees within the Group (including any persons employed by, or in any other form of relationship or authority to any of the Company’s subsidiaries, irrespective of the duration of employment) (“**Employees**”).
- 1.3 All Employees will be provided with a copy of this Policy and will be informed about its application and importance. This Policy will be posted on the Company’s intranet page, Confluence and website.
- 1.4 The Company may vary or amend this Policy at its discretion and may apply it as far as practicable in the circumstances.
- 1.5 The objective of this Policy is to:
- (a) ensure that communications with the public about the Company are timely, factual, accurate, balanced, and disseminated in accordance with all applicable legal and regulatory requirements;
 - (b) raise awareness of the Company’s approach to disclosure among its directors and Employees, including the risk of unlawful disclosures; and
 - (c) address and minimise the likelihood of any inadvertent insider trading.
- 1.6 All Employees who may come into contact with Inside Information (defined below) must comply with this Policy. Any Employee who violates this Policy may face disciplinary action up to and including immediate termination of employment or engagement. All breaches will be reported to the Disclosure Committee (as specified below). The violation of this Policy may also lead to violation of the MAR and certain securities laws, which could lead to fines or other administrative or criminal penalties.

2. IDENTIFICATION OF AND REQUIREMENT TO DISCLOSE INSIDE INFORMATION

- 2.1 “**Inside Information**” is information of a precise nature which has not been made public, relating, directly or indirectly, to the business and affairs of the Company or to one or more financial instruments of the Company, and which, if it were made public, would likely have a significant effect on the Company’s share price or that a reasonable investor would be likely to use as part of its investment decision. An intermediate step in a protracted process can also be deemed to be Inside Information.

Precise nature - information is “of a precise nature” if it indicates a set of circumstances or events which exists or which may reasonably be expected to come into existence, or which has occurred or which may reasonably be expected to occur,

where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or events on the prices of the Company's financial instruments.

Significant effect - information would be regarded to have a "significant effect" on the price of financial instruments only if a reasonable investor would likely use such information as part of the basis for its investment decision. There is no set percentage change in the share price which would indicate a "significant" effect on price.

- Once it has been established that the information is of a kind which a reasonable investor would be likely to use as part of the basis for their investment decisions, there is no further requirement to consider what the likely effect on the Company's share price might be (e.g. there is no set percentage change in the share price) – that alone is enough to conclude that the information would be likely to have a significant effect on price.

Information which has not been made public - information is considered to have been made public if the Company makes the information public in accordance with the relevant requirements of the Luxembourg Act of 11 January 2008 on transparency requirements for issuers, as amended (the "**Transparency Act**") and the relevant requirements under Dutch law. Subject to complying with the aforementioned requirements, situations where information is generally considered to have been made public also include where it is contained in records which are open to the public, if it is otherwise generally available, including through the internet or some other publication (including if it is only available on payment of a fee), if it derived from public information or if it can be obtained by observations by the public without infringing anyone's rights.

2.2 Information that could be considered as Inside Information includes the following, depending on the relevant facts and circumstances:

- (a) meaningful deviations from earlier near-term or medium-term forecasts and generally accepted market expectations;
- (b) the release of major new products;
- (c) key business developments such as major contract awards or cancellations;
- (d) the formation of strategic joint ventures or partnerships;
- (e) potential or actual mergers, acquisitions, tender offers or disposals;
- (f) management or control changes, including a material change in the spread of shareholdings;
- (g) dividend announcements and changes to dividend policy;
- (h) substantial changes in credit or financing arrangements, including any breach of covenants;
- (i) company reorganisation; and
- (j) commencement of, or material developments in, material litigation or regulatory actions.

- 2.3 Under the MAR, the Company is required to disclose Inside Information to the market as soon as possible, unless the exemption in section 2.4 applies.
- 2.4 Delays in disclosure will only be permitted if: (i) immediate disclosure is likely to prejudice the Company's legitimate interests; (ii) the delay is not likely to mislead the public; and (iii) the Company can ensure the confidentiality of the Inside Information. The Company is required to notify the Dutch Authority for the Financial Markets (*Stichting Autoriteit Financiële Markten*) (the "**AFM**") of the delayed disclosure of Inside Information, and must keep a record (for a five year period immediately following such notification) of how it reached the decision to delay disclosure was in the Company's legitimate interests.
- 2.5 The decision as to whether an event, development or other information is Inside Information which must be disclosed (unless a delay in disclosure is permitted as described in section 2.4 above) shall be taken by the CEO and CFO, following advice from and consultation with the Disclosure Committee (as specified below).

3. REPORTING OF INSIDE INFORMATION

If any Employee becomes aware of information that they believe may be Inside Information, and they believe that this information is not known by any member of the Board or the Executive Leadership Team (the "**ELT**")¹ and senior management, they must inform a member of the Disclosure Committee (see below) of this information as soon as possible. Employees are not expected to make a judgement as to whether information is Inside Information. Rather, any project, event or change in trading at business unit level should be reported to the Disclosure Committee if it is believed to be sufficiently material to the business unit concerned that an investor in the Company may want to know about it.

4. DISCLOSURE COMMITTEE

Disclosure Committee Composition, Role and Process

- 4.1 The Board has established a disclosure committee (the "**Disclosure Committee**"). The Disclosure Committee consists of the General Counsel, Chief Executive Officer (the "**CEO**"), Chief Operating Officer (the "**COO**") and the Chief Financial Officer (the "**CFO**"). The Disclosure Committee can be contacted at disclosure-committee@benevolent.ai.
- 4.2 Each member of the Disclosure Committee may appoint a designate. The Disclosure Committee may invite other directors, members of the ELT, senior management and Employees, when deemed advisable, to assist in the discussion and consideration of its duties. The General Counsel will chair the Disclosure Committee unless another member of the Disclosure Committee is appointed as such by the Board from time to time.
- 4.3 The Disclosure Committee will monitor all disclosure of Company Inside Information to ensure accurate reporting, including by taking corrective measures if necessary.

¹ The Chief Executive Officer, the Chief Operating Officer, the Chief Financial Officer, the General Counsel, the Chief Scientific Officer, the Chief Technology Officer and the Chief People Officer constitutes the Company's Executive Leadership Team, together with such other individuals who are appointed to the Executive Leadership Team from time to time.

- 4.4 To assist the Disclosure Committee in being kept fully informed of all pending material Company-related developments, ELT and senior management shall forward to the Disclosure Committee, promptly and in advance, information relating to material Company-related developments, in order for the Disclosure Committee to evaluate and discuss those events to determine the appropriateness and timing for public release of information.
- 4.5 The Disclosure Committee will meet as conditions dictate (at least quarterly).
- 4.6 The Disclosure Committee will establish specific procedures and timetables for:
- (a) the preparation of all disclosure documents;
 - (b) the review of these documents by such personnel, auditors, external legal counsel and communication agency as the Disclosure Committee may determine; and
 - (c) the dissemination of these documents in compliance with this Policy.

Review Process for Public Disclosures

- 4.7 The Company's public disclosures can be divided into three categories:
- (a) annual and half-year reports and related slide decks ("**Periodic Reports**");
 - (b) press releases with Inside Information ("**Material Press Releases**"); and
 - (c) other publications, including press releases and presentations with information not considered Inside Information ("**Other Publications**").
- 4.8 All Periodic Reports and Material Press Releases must be reviewed prior to publication by the Disclosure Committee. An exception may be made in the case where there is a need for immediate release of Material Press Releases (e.g. in the event of a leak of Inside Information or a significant development materially affecting the Company) that justifies the circumvention of the normal review process. If this exception is to be exercised, prior to the publication of the relevant press release, consultation must be sought by the CEO and CFO, to the extent practicable, with the chairperson of the Disclosure Committee. In any event, the CEO and CFO shall have the authority to approve the immediate publication of the press release in such circumstances if consultation with the chairperson of the Disclosure Committee is not practicable under the circumstances.
- 4.9 All Other Publications must be reviewed prior to publication by the Disclosure Committee.

2. DESIGNATED SPOKESPERSONS

- 5.1 The CEO, CFO, COO, General Counsel, VP Communications and VP Investor Relations are designated as an "Authorised Spokesperson" for the Company. Unless specifically asked to do so by an Authorised Spokesperson, other Employees of the Company must not respond under any circumstances to inquiries from the AFM, the Luxembourg Financial Supervisory Authority (*Commission de Surveillance du Secteur Financier*, the "**CSSF**"), Euronext Amsterdam, the investment community, the media, or other members of public.

- 5.2 All market-related and investor-related inquiries (including electronic inquiries) should be referred to the VP Investor Relations as the first point of contact. All inquiries from the media (regardless of their nature or subject) should be referred to VP Communications (especially for non-financial media), keeping the VP Investor Relations in copy to coordinate appropriate responses.
- 5.3 The Authorised Spokesperson(s) will ensure that any response to such inquiries is:
- (a) consistent based on the information provided; and
 - (b) compliant with public disclosure requirements.
- 5.4 The VP Communications and the Communications Team will also assist with the development of key messages and the preparation of answers to anticipated questions (Q&As).
- 5.5 The Disclosure Committee is responsible for ensuring that the AFM, CSSF and Euronext Amsterdam have contact information for the Authorised Spokesperson(s). All Employees should refer inquiries from the AFM, CSSF and/or Euronext Amsterdam to the VP Investor Relations, who in consultation with the General Counsel, will manage the Company's response.

3. ELECTRONIC COMMUNICATIONS

- 6.1 This Policy applies to all electronic communications. The Disclosure Committee is responsible for reviewing all postings on the Company's website, or delegating that review to another appropriate employee, in order to ensure that these do not include Inside Information. The VP Investor Relations will be responsible for overseeing the contents of the 'Investor Relations' section of the Company's website.
- 6.2 The Company must post all Inside Information it is required to disclose publicly on the 'Investor Relations' section of the Company's website, and make a relevant filing with the AFM, the Euronext Amsterdam, the CSSF and the Luxembourg Officially Appointed Mechanism (the "OAM") and disseminate as required by the MAR, the DFSA and the Transparency Act.
- 6.3 The Company shall ensure that such disclosed Inside Information posted on its website (a) can be accessed on a non-discriminatory basis and free of charge and (b) clearly indicates the date and time of the disclosure (including any text and audio-visual material) and that such information is organised in chronological order. The website should also include a notice that advises the reader that the information has and will not be subsequently updated after the date of initial posting and might be superseded by subsequent disclosures. The MAR requires any Inside Information posted on the Company's website to be maintained for a period of at least five years.
- 6.4 Inside Information must not be released on the Company's website or disseminated through social media networks prior to the issuance of a press release. The VP Investor Relations will be responsible for ensuring that appropriate press releases are available on the Company's website.
- 6.5 Only public information or information that could otherwise be disclosed in accordance with this Policy shall be used to respond to electronic inquiries.

4. SOCIAL MEDIA

Employees should never discuss non-public financial or operational information or any other Inside Information that might be important to the Company's investors. Employees (other than Authorised Spokespersons) are prohibited from participating in any internet or social media discussions or blogging on matters pertaining to the Company's activities or its securities. Employees who encounter such a discussion pertaining to the Company in such forums should inform the Disclosure Committee immediately, so the discussion may be monitored.

5. MAINTAINING CONFIDENTIALITY

8.1 Any Employee privy to Inside Information will be advised that the information is price sensitive and must not be shared with anyone else, unless it is necessary and they are authorised by the Company to do so in the course of business. Such Employees cannot trade in the Company's securities until the information is publicly disclosed, and they will be put on an insider list compliant with the requirements under the MAR and Implementing Regulation (EU) 2016/347 of 10 March 2016. Efforts will be made to limit access to Inside Information to only those who need to know it. Consequently, the following processes will be adopted:

- Lists of those Employees and advisers with access to Inside Information will be maintained by the Deputy Company Secretary (or an appropriate designee) and the list will be kept for a period of five years from date on which it is prepared or updated.
- There will be two types of insider lists: a central insider list for a limited number of persons with regular access to all Inside Information (permanent insiders); and a transaction-specific or event-based insider list that identifies persons with Inside Information relating to a specific transaction or event (project insiders). Templates for each can be found in Appendix 1 of this Policy.
- Employees with access to Inside Information are required to acknowledge in writing their legal and regulatory duties and must be made aware of the sanctions applicable to insider dealing and unlawful disclosure of Inside Information.
- The Deputy Company Secretary must be informed immediately if Inside Information is disclosed to any person (internal or external) whose name is not on an insider list.
- The Deputy Company Secretary should be kept fully informed at all times and should monitor the status, with the assistance of the relevant project manager, of projects and transactions that potentially could constitute Inside Information.
- External third parties privy to Inside Information concerning the Company will be informed that they are required to not divulge this information to anyone else, other than in the necessary course of business and as permitted by the Company. Such persons will be advised that they cannot trade in the Company's securities until the information is publicly disclosed, and that they will be required to keep an insider list compliant with the requirements under MAR.

- Where any Inside Information has been disclosed to others in the necessary course of business, those recipients must be made aware that they also are bound by confidentiality and the relevant securities trading prohibitions. All such recipients must sign a confidentiality agreement pursuant to which they agree to be bound by relevant non-disclosure obligations and securities trading restrictions.
- Directors and Employees with knowledge of Inside Information of (i) the Company or (ii) any of the Company's counterparties in negotiations of potentially material transactions are prohibited from trading securities of the Company or any such counterparty until the information has been fully disclosed, and they will be put on an insider list compliant with the requirements under MAR. Please refer to the Insider Trading Policy for more information on Closed Periods and Trading Restrictions.

8.2 To prevent the misuse or inadvertent disclosure of Inside Information, the following procedures should be observed by Employees at all times:

- (a) Documents and files containing Inside Information should be kept in a safe place, with access restricted to individuals on a 'need to know' basis. Code names should be used if necessary.
- (b) Confidential matters should not be discussed in places where the discussion might be overheard, such as elevators, hallways, restaurants, airplanes or taxis.
- (c) Confidential documents should not be read or displayed in public places and should not be discarded where others can retrieve them.
- (d) Employees must ensure they maintain the confidentiality of information both inside and outside of the office. Transmission of documents by electronic means, such as by email or from one computer to another, should only be made where it is reasonable to believe that the transmission can be made and received under secure conditions.
- (e) Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded.
- (f) Extra copies of confidential documents should be shredded or otherwise destroyed.
- (g) Access to confidential electronic data should be restricted through the use of passwords and confidential documents should not be stored in a shared directory.

6. PRINCIPLES OF DISCLOSURE OF INSIDE INFORMATION

9.1 In complying with the requirement to immediately disclose all Inside Information under applicable laws, the Company will adhere to the following disclosure principles:

- (a) Inside information will be publicly disclosed immediately via a press release, unless the delay of disclosure is allowed as described in section 2.4 above.

- (b) Disclosure must include any information the omission of which would make the rest of the disclosure misleading.
- (c) Unfavourable Inside Information must be disclosed as promptly and completely as favourable information.
- (d) There must be no selective disclosure of Inside Information to selected shareholders or certain interested individuals (for example, in an investor meeting or during a telephone conversation with an analyst).
- (e) If Inside Information is inadvertently disclosed, the Disclosure Committee must be notified immediately so this information can be publicly disclosed immediately via a press release.
- (f) Disclosure should be consistent among all audiences, including shareholders, investment community, the media, customers, and Employees.
- (g) Inside information must not be disclosed to the Company's Employees prior to the dissemination and filing of a disclosure press release.
- (h) Derivative information (information extracted from a document filed on behalf of another person or company), which is included in a document or oral statement, should reference the underlying document that was the source of the information.
- (i) Any disclosure of Inside Information at an analyst or shareholder meeting, a press conference or conference call, on the Company's website, or via social networking sites must be preceded by a press release.
- (j) Disclosure must be corrected immediately if the Company subsequently learns that the earlier disclosure contained a material error at the time it was given.

7. CORRECTING ERRORS

If the Disclosure Committee determines that a disclosure document contains a material error or misrepresentation, or if the Company has failed to make a timely disclosure of a material change, the Company must take immediate steps to issue a clarifying press release.

8. RUMOURS

- 11.1 As a general principle, the Company shall not comment, affirmatively or negatively, on rumours, including rumours on the internet such as on social networking sites. The Authorised Spokespersons shall take a consistent "no comment" approach if queried about any rumours.
- 11.2 Should the AFM request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in the Company's securities, the Disclosure Committee will consider the matter and decide whether to make a policy exception.
- 11.3 If a rumour is true in whole or in part or might be evidence of a leakage of Inside Information, the Disclosure Committee will consider whether it is appropriate to issue a press release disclosing the relevant Inside Information.

9. PRESS RELEASES

Procedures

12.1 Once the Disclosure Committee determines that a development involves Inside Information, it will advise on the appropriateness of issuing a press release. If a statement which includes Inside Information is inadvertently made in a selective forum, the Company must immediately issue a press release to fully and publicly disclose that information, even if it occurs during business hours.

Approvals for earnings guidance and financial results press releases

12.2 The Audit, Finance and Risk Committee will review press releases containing earnings guidance and financial results prior to their issuance.

Distribution

12.3 Press releases will be disseminated through a newswire service that provides simultaneous distribution. Press releases will be posted on the Company's website immediately after confirmation of dissemination over the newswire (labelled as containing Inside Information, if applicable). If the press release contains Inside Information, the press release will be filed with the AFM, the Euronext Amsterdam, the CSSF and the OAM, simultaneously or immediately after release to the market.

Forward-Looking Information

12.4 A consistent approach to disclosure is important. If the Company elects to disclose forward-looking information in disclosure documents, speeches, conference calls, etc., the following guidelines must be observed:

- (a) Whether forward-looking information is Inside Information will be determined by whether a reasonable investor's investment decision would be influenced or changed if the forward-looking information were omitted or misstated.
- (b) Subject to sub-sections (c) and (d), all forward-looking Inside Information will be included in a press release.
- (c) The forward-looking information will be published only if there is a reasonable basis for drawing the conclusions or making the forecast and projections set out in the forward-looking information.
- (d) Any published forward-looking information will be limited to a period that can be reasonably estimated. The document containing the forward-looking information must have, proximate to that information, statements that:
 - (i) identify the information as forward-looking;
 - (ii) caution that actual results may differ materially from the forward-looking information; and
 - (iii) caution that the information is being provided as of the date of publication or otherwise indicated and is subject to change after that date.

- 12.5 Public oral statements that contain forward-looking information also require a cautionary statement that actual results could differ materially. The Disclosure Committee will assist in reviewing the reasonableness of assumptions and the process for preparing and reviewing the forward-looking information prior to finalizing disclosures.
- 12.6 Once the Company has published forward-looking information, the Disclosure Committee will monitor ongoing events and circumstances to assess whether statements of forward-looking Inside Information should be replaced by new guidance or withdrawn, and if the information should be withdrawn, issue a press release discussing the events and circumstances that led to the decision to withdraw the guidance, including any underlying assumptions to that guidance that are no longer valid.

10. DEALING WITH THE INVESTMENT COMMUNITY

General

- 13.1 The Company recognises that meetings with analysts and investors are an important element of its investor relations program. Face-to-face meetings help to develop an understanding of the Company, its strategy and performance, and can be essential for the investment community to assess the quality of senior management. The Authorised Spokespersons may meet with analysts and investors individually or in small groups, and will initiate contacts or respond to analyst and investor calls in a timely, consistent, and accurate fashion in accordance with this Policy. All analysts will receive fair treatment regardless of whether they are currently recommending buying or selling the Company's securities. Care must be taken that Inside Information is not inadvertently disclosed in presentations or other visual and printed materials that may be used or distributed at meetings.
- 13.2 The Company will provide only non-Inside Information through individual and group meetings, in addition to previously publicly disclosed information.
- 13.3 The Company will make available to individual investors or reporters the same level of detailed, non-Inside Information that it has provided to analysts and institutional investors, and shall, where possible, facilitate such access by posting this information on its website. Where presentations or other materials are used and posted on the Company's website, they will be dated and the Company will routinely archive or remove outdated materials.
- 13.4 If it is determined that Inside Information has been selectively disclosed during a meeting or telephone conversation with analysts or investors, the Company will take steps to immediately disclose the information publicly via a press release. Members of the media will not be given Inside Information on an exclusive, embargoed or selective basis. They will receive such information at the same time as everyone else: when a public announcement is made via a press release.
- 13.5 The Authorised Spokespersons should keep notes of telephone conversations with reporters and follow up with reporters when there is a significant or misleading inaccuracy in an article that could affect investors, in order to clarify the inaccuracy and ensure that the error does not recur in future articles.

Quiet Periods

- 13.6 To avoid potential unlawful selective disclosure, and any perception or appearance of selective disclosure, the Company will observe quiet periods prior to earnings announcements or when material changes are pending, i.e. during 'closed periods' as defined in the Company's Insider Trading Policy.
- 13.7 During a quiet period, the Company will not initiate any meetings or telephone contacts with analysts and investors, but the Authorised Spokespersons may continue to respond to unsolicited inquiries concerning factual matters. In doing so, the Authorised Spokespersons must make it clear that they cannot comment on the current financial reporting period's results. If the Company is invited to participate in investment meetings or conferences organised by others during a quiet period, the Disclosure Committee should determine, on a case-by-case basis, if it is advisable to accept the invitation. If accepted, extreme caution must be exercised to avoid selective disclosure of any Inside Information.

Conference Calls

- 13.8 Conference calls will be held for earnings updates and for major corporate developments as determined by the Disclosure Committee. All conference calls will be accessible simultaneously to all interested parties, by telephone or via a webcast over the Internet. The call will be preceded by a press release containing all relevant Inside Information. At the beginning of the call, an Authorised Spokesperson should provide appropriate cautionary language regarding any forward-looking information.
- 13.9 The Company will provide advance notice of the conference call and webcast by issuing a press release announcing the date, time, and topic as well as information on how interested parties can access the call and webcast. These details will be provided on the Company's website.
- 13.10 In addition, the Company may send invitations to analysts, institutional investors, the media, and others. Any non-inside supplemental information provided to participants will also be posted to the Company's website.
- 13.11 The Disclosure Committee will hold a debriefing meeting immediately after a conference call. If it determines that selective disclosure of Inside Information or a misleading disclosure has occurred, the Company must immediately disclose or correct the information publicly via a press release.

11. SHAREHOLDER INTERACTION WITH THE BOARD

Generally, it is the Board's responsibility to communicate with shareholders. To prevent selective disclosure, the members of the Board should familiarise themselves with this Policy, be briefed on the Company's public disclosure record, and be provided guidance on what constitutes Inside Information. In addition, the General Counsel and/or the VP Investor Relations should be present at any meetings between directors and shareholders.

12. PRESENTATIONS BY EMPLOYEES

Employees who are invited to make speeches or presentations about the Company to industry groups or other forums must receive the approval of the Disclosure Committee before accepting such invitations. Presentation materials should be provided to the Disclosure Committee for review, and must not contain non-public financial and operational results, subject matter of a competitive or strategic nature,

or information that could affect the Company's reputation or share price and should be provided to the Disclosure Committee for review. The Disclosure Committee will manage the approval process for such Employee presentations.

13. SHARE PRICE OR INVESTMENT IN THE COMPANY

At no time should any person acting as a representative of the Company comment on expectations for future share price or provide any advice regarding investment in the Company. Persons requesting this type of information should contact their financial advisor.

14. RETENTION PERIOD

The Deputy Company Secretary will maintain a continuous file of all disclosure documents (a disclosure record). Press releases and documents filed with the AFM, the Euronext Amsterdam, the CSSF and the OAM will be kept for five years. Material communication with analysts and investors, including blog posts, transcripts or tape recordings of conference calls, speeches and presentations, notes from meetings and telephone conversations, debriefing notes, emails, and social media, will also be kept for five years.

15. DATA PROTECTION

- 18.1 This section sets out the basis on which the Company will use your personal data pursuant to its obligations under the MAR, and supplements, and does not override, the Group's Data Protection Policy. The processing of personal data is necessary for compliance with the legal obligations to which the Company is subject under the MAR.
- 18.2 The following types of data may be collected about Employees pursuant to the Company's obligations under the MAR: first name; surname; birth surname (if different from surname); company name and address; company phone numbers (direct line and work mobile); date of birth, national identification number; personal phone numbers (home and mobile); full personal address (street name, street number, city, post code and country); function and reason for being an insider; date and time at which an Employee obtained Inside Information; and the date and time at which the Employee ceased to have access to Inside Information (as applicable).
- 18.3 In order to comply with such legal obligations, the Company may disclose Employee's personal data to certain other Employees of the Company on a need-to-know basis and to certain third parties including the Company's professional advisors, regulators and other government bodies or law enforcement agencies. It may not be possible to notify the relevant Employees in advance about the details of such disclosures. The Company will use all reasonable efforts to disclose the minimum personal data necessary in such cases. The Company will retain personal data for the period necessary to comply with its MAR obligations, or otherwise to the extent required to comply with any other of its legal obligations or to defend or pursue legal claims.
- 18.4 Employees' personal data may be accessible from, and may be transferred to, countries outside the European Economic Area and the United Kingdom ("UK"). Any such transfers will be carried out under the European Commission's model contracts for the transfer of personal data to third countries (i.e., the standard contractual clauses), or any equivalent contracts issued by the relevant competent authority of

the UK, as relevant, unless the data transfer is to a country that has been determined by the European Commission or the relevant UK authorities, as applicable, to provide an adequate level of protection for individuals' rights and freedoms for their personal data.

- 18.5 Employees have certain rights in relation to your personal data. Please refer to the Company's Data Protection Policy for details on the rights and how to exercise them.

16. RELATED DOCUMENTS

Without limitation to the applicability of all relevant policies and regulations, this Policy should be read in conjunction with the Company's Insider Trading Policy (available on the Company's intranet, Confluence and website).

17. QUESTIONS

If you have any queries on this document or on the policies and procedures, you should contact a member of the Disclosure Committee. Further information on the Disclosure Committee can be found under section 3 above.

Part 2 : Central insider list of permanent insiders

Insider list: permanent insiders section of the insider list

Date and time (of creation of the permanent insiders section):

Date and time (last update):

Date of transmission to the AFM:

First name(s) of the insider	Surname(s) of the insider	Birth surname (s) of the insider (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which a person was included in the permanent insider section)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address: street name; street number; city; postcode; country)