Insider Trading Regulation Ctac N.V.

Article 1. DEFINITIONS

The following definitions apply in this regulation:

Compliance Officer	the employee designated as such by the Board of Directors of the Company (hereinafter: "BoD") as the Compliance Officer. The Compliance Officer may also be a member of the BoD. If the Compliance Officer is also a member of the BoD, the duties and powers of the Compliance Officer shall be exercised independently from his or her other duties and responsibilities. If the Compliance Officer has a personal interest or a conflict of interest in a matter governed by these Insider Regulations, or is otherwise unable to act independently in relation to such matter, the relevant duties and powers shall be exercised by a person designated in advance by the BoD who is able to act independently.
Financial Instruments	shares or debt instruments or derivatives of Ctac N.V. (hereinafter: "the Company") or other financial instruments related thereto;
Associated Persons	(a) spouses, registered partners or cohabiting partners of an Insider; (b) children of an Insider who are under their authority or who have been placed under legal guardianship and for whom such person has been appointed as guardian; (c) other blood relatives or affinal relatives of an Insider who have shared a household with him or her for at least one year; or (d) a legal entity, trust or partnership ("*personenvennootschap*") in which an Insider or any person referred to under (a), (b) or (c) above holds managerial authority, which is under the control of such person, established for the benefit of such person or whose economic interests are substantially equivalent to those of such person;
Closed Period	a period during which no transactions in Financial Instruments may executed or effected;
Insider	Managers, Associated Persons and Employees with Reporting Obligations;
Insider List	a list of Employees with Reporting Obligations;
Insider Trading Regulation	this Insider Trading Regulation;
Managers	employees (including members of the BoD and the members of the Supervisory Board (hereinafter: "SB") who hold a managerial position within the Company or a subsidiary or group company and who, by virtue of that position, have the authority to make decisions that may affect the future developments of the Company and who may have access to Inside Information;
Employees with Reporting Obligations	individuals within the Company or any of its subsidiaries or group companies who may on a regular or occasional basis possess Inside Information and who are designated as Insiders;
Inside Information	knowledge of information of a precise nature that has not been made public, which relates directly or indirectly to the Company or to one or more Financial Instruments, and which, if made public, would be likely to have a significant effect on the prices of those Financial Instruments;

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Employees	individuals who are employed by or otherwise subject to the authority of the Company or any subsidiary or group company, including Managers and Employees with Reporting Obligations;
Wft	the Dutch Financial Supervision Act ("*Wet op het financieel toezicht*") including all rules, regulations and provisions issued pursuant thereto, as amended from time to time.

Article 2. GENERAL PROVISIONS FOR ALL EMPLOYEES

2.1 Prohibitions for all Employees

i. All Employees who possess Inside Information are prohibited from executing transactions in Financial Instruments.

ii. All Employees who possess Inside Information are prohibited from recommending or encouraging third parties to execute transactions in Financial Instruments.

iii. It is prohibited to execute transactions in Financial Instruments if such actions could reasonably be perceived as suggesting that the person(s) involved possesses or have made use of Inside Information.

iv. All Employees who possess Inside Information relating to the Company or to transactions in Financial Instruments are prohibited from disclosing such Inside Information to third parties, unless:

   a. the disclosure occurs in connection with the proper performance of work or duties; and

   b. the recipient of the information is bound by a duty of confidentiality in that regard.

2.2 Other provisions for all Employees

i. All Employees shall refrain from any use of price-sensitive information and shall avoid any conflict of interest between personal and business interests, as well as any situation that could reasonably give the appearance of such conflict.

ii. All Employees are expected to handle business-related information with care and ensure that such information remains separate from their private affairs.

iii. All Employees acknowledge that the Compliance Officer is authorized to initiate or conduct investigations into transactions of Financial Instruments, carried out by, on behalf of or at the instruction of the Employees.

iv. To ensure strict compliance with the Insider Trading Regulation all Employees are, upon request, required to provide the Compliance Officer with all relevant information concerning any transaction in Financial Instruments executed by them or on their behalf.

v. All Employees are obliged, upon request, to instruct the investment firm where they maintain their securities account to provide the Compliance Officer with all information regarding any transaction in Financial Instruments executed on their behalf or at their instruction.

2.3 Exceptions

The prohibition set out in Article 2.1i does not apply in the following circumstances:

i. when an Employee executes transactions in Financial Instruments pursuant to an obligation that arose before the Employee came into possession of Inside Information;

ii. when an Employee accepts options granted under an equity incentive plan ("*aandelenoptieregeling*"), provided that a consistent policy is applied regarding its terms and periodicity;

iii. when options under an equity incentive plan are exercised either on the expiration date or within five (5) business days preceding that date, or when Financial Instruments acquired through such exercise are sold during that same period provided that the Employee has notified the Compliance Officer in writing of their intent to sell at least four (4) months prior to the expiration date, in which case the Employee is required to proceed with the sale, or the Employee

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has granted the Company an irrevocable power of attorney to execute the sale on their behalf;

iv. when Financial Instruments are received by way of dividend, excluding optional dividend schemes;

v. when Financial Instruments acquired under an equity incentive plan are sold in accordance with a consistent policy regarding the terms and periodicity, provided that:

   a. the sale of the Financial Instruments occurs immediately after the conditions for sale under the plan are met; and

   b. the proceeds from the sale are immediately used to settle any tax liability arising from the acceptance of the Financial Instruments under the plan;

vi. any other circumstances that fall within the scope of exemptions or exceptions applicable to the Employee(s) under the Dutch Wft.

Article 3. ADDITIONAL PROVISIONS FOR INSIDERS

3.1 Additional provisions for Insiders:

i. Insiders are prohibited from executing transactions in Financial Instruments during a Closed Period, unless they have obtained prior written approval from the Compliance Officer and do not possess Inside Information.

ii. Outside a Closed Period, Insiders are prohibited from executing transactions in Financial Instruments if the Compliance Officer has imposed such a restriction pursuant to the provisions of this Insider Trading Regulation.

iii. The Compliance Officer may, when necessary to avoid the appearance of market abuse, impose a prohibition on Insiders from trading in exchange-listed financial instruments of third parties.

iv. Insiders are prohibited from trading in options on Financial Instruments or in other financial instruments whose value is wholly or partly derived from the value of Financial Instruments, except for options granted by the Company under an equity incentive plan, provided that they have obtained prior written approval from the Compliance Officer and do not possess Inside Information.

3.2 Exceptions

The prohibitions set out in Article 3.1 do not apply to transactions referred to in Article 2.3.

3.3 Reporting obligations for all Insiders

i. Insiders must promptly report to the Compliance Officer any transactions in Financial Instruments executed by or on behalf of them. For this purpose, the form attached as Annex II to this Insider Trading Regulation must be used.

ii. The Compliance Officer will, on behalf of the Insider, notify the AFM of the transaction within two (2) business days after the transaction has taken place.

iii. Insiders remain fully responsible at all times for complying with their reporting obligations within the prescribed timeframe, to the extent this lies within their control.

3.4 Other Provisions for Insiders

i. The prohibitions described above continue to apply to Insiders for a period of six (6) months after termination of their position or their removal from the Insider List.

ii. After having taken note of the Insider Trading Regulation, Insiders must send a signed copy of the Declaration of Compliance including the Insider Trading Regulation, as attached in Annex I to the Compliance Officer.

Article 4. PROVISIONS REGARDING CLOSED PERIODS

4.1 An Insider shall not directly or indirectly purchase or sell Financial Instruments:

i. during the period of thirty (30) days immediately preceding the initial publication of an annual report;

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ii. during the period of thirty (30) days immediately preceding the publication of a half-year or quarterly report or the announcement of an (interim)dividend;

iii. during the period of thirty (30) days immediately preceding the initial publication of a prospectus for a share offering, unless the issuing entity demonstrates that the decision making period is shorter than one month, in which case such shorter period shall apply.

4.2 An Insider shall not sell Financial Instruments within six (6) months after acquiring such instruments, nor purchase Financial Instruments within six (6) months after selling such instruments.

Article 5. Rules regarding the Supervisory Board and the Board of Directors

5.1 The members of the SB and the BoD are authorized to acquire an interest of up to 3%.

5.2 All transactions executed by the BoD shall be reported to the SB on a quarterly basis. This reporting obligation shall be without prejudice to any reporting obligations set forth in Article 3.3.

Article 6. Duties and powers of the Compliance Officer

6.1 The current Compliance Officer of the Company is Wim Geraats (interim CFO):

i. Mobile: +31 (0)653 96 54 27

ii. E-mail: legal@ctac.nl

6.2 The duties of the Compliance Officer include:

i. announcing, in a timely manner and no later than prior to the start of each calendar year, the periods in that calendar year that shall in any event be considered Closed Period. Any amendments or additions shall be announced in the same manner during the year;

ii. maintaining an Insider List and providing written notice to individuals added to this list, informing them of their inclusion, the prohibitions relating to possessing Inside Information and the sanctions applicable under the Wft in the event of violations;

iii. designating Employees as Insiders for a specified period;

iv. prohibiting Insiders from executing transactions in Financial Instruments outside a Closed Period whenever necessary;

v. prohibiting Insiders from executing transactions in financial instruments of third parties, when and to the extent necessary to avoid the appearance of market abuse;

vi. granting exemptions from the prohibitions referred to in Article 2.1;

vii. reporting transactions in Financial Instruments by Insiders to the AFM, as referred to in Article 3.3, where and to the extent required by law;

viii. advising and informing Employees upon request, regarding the content and interpretation of applicable regulations without relieving Employees of their own statutory responsibilities and obligations;

ix. maintaining a register in which notifications, requests, decisions and other relevant documents to the Insider Trading Regulation are recorded;

x. conducting or arranging for the conduct of investigations into compliance with this Insider Trading Regulation. The Compliance Officer is authorized to report the outcome of such investigations in writing to the (Chair of the) BoD. Before issuing a written report on an investigation's finding, the individual concerned must be given the opportunity to respond to those findings; and

xi. monitoring compliance with this Insider Trading Regulation. When an act or omission is identified that violates any provision of this Insider Trading Regulation, appropriate measures shall be taken against the individual involved.

's-Hertogenbosch, 16 March 2023
Board of Directors

This document is a non-official translation of the Dutch version. In the event of any contradiction between the Dutch and the English versions, the Dutch text is binding.

Annex I. Declaration of consent to the Insider Trading Regulation

Name of signatory : .....

Address : .....

Postal code + city : .....

Date of birth : .....

Place of birth : .....

Employee number : .....

Department : .....

Employment start date : .....

External employee (seconded, temporary worker, etc.): yes/no

Hereby declares:
- to have taken note of the Insider Trading Regulation;
- to understand the contents of the Insider Trading Regulation; and
- to act in accordance with the provisions set out in the Insider Trading Regulation.

Date : ..... City: .....

Signature : .....

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Annex 2. (Internal) notification form for transactions in financial instruments related to Ctac N.V. by or for the benefit of Insiders

1. Name and address of the person subject to the reporting obligation:

.....

2. Type of financial instrument: (e.g. shares, debt instrument, option, warrant):

.....

3. Type of transaction (purchase/sale):

.....

4. Company that issued the Financial Instrument if other than Ctac N.V.:

.....

5. Reason for reporting the transaction:

.....

6. To be completed where applicable:

- Nominal value of the financial instrument (in €) :

.....

- Option series (call option/put option) :

.....

- Exercise price (in €) :

.....

- Expiry date :

.....

7. Date of the transaction:

.....

8. Total number of Financial Instruments related to Ctac N.V. or affiliated Financial Instruments held prior to the transaction:

.....

9. Number of Financial Instruments purchased or sold:

.....

10. Total number of Ctac N.V. Financial Instruments held after the transaction:

.....

11. Price of the Financial Instruments(in €):

.....

Truthfully completed as follows:

City : .....

Date : .....

Name : .....

Signature : .....

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