

POLICY ON BILATERAL CONTACTS WITH SHAREHOLDERS

This is the policy of Refuels N.V. (the **Company**) in respect of bilateral contacts with shareholders in accordance with best practice provision 4.2.2 of the Dutch Corporate Governance Code, as adopted by the Board of Directors on 12 May 2023.

1. CONTACTS WITH SHAREHOLDERS

- 1.1 The Company is committed to maintaining an open and constructive dialogue with its shareholders and potential shareholders. Conversations with shareholders will primarily take place in general meetings but may also be held on a bilateral basis.
- 1.2 The policy is to provide all shareholders and other parties in the financial markets with equal and simultaneous information about matters that may influence the share price.
- 1.3 The Company will take into consideration all requests from shareholders to enter into a conversation. The Company will agree to such requests for those situations where the Board of Directors deems this in the Company's interest. The initiative to enter into a conversation with a shareholder can also be taken by the Company.
- 1.4 In order to assess whether a conversation with shareholders could be in the interest of the Company and its stakeholders, the Company may request its shareholders to provide certain (written) information before engaging into a bilateral contact. This information can include the objective of the conversation, the matters to be discussed, the opinion of the shareholders on these matters and information in respect of the shareholders and its interest in the Company.
- 1.5 Among other items, a trading update is provided at the annual general shareholders' meetings and may be provided towards the end of the financial year through interim management statements. In addition, briefings on annual and interim results may be distributed via a press release and presented to analysts and investors through accessible conference calls, webcasts and presentations.
- 1.6 The interim and annual financial results announcements, presentations, certain regulatory filings, other important announcements, and corporate governance documents concerning the Company, are published on the corporate website (www.refuels.nl).
- 1.7 The Company adheres to all legal obligations relating to confidentiality, disclosure of inside information and equal treatment of shareholders and only discusses publicly known information in one-on-one meetings. In the event that non-public inside information is accidentally disclosed during any bilateral contact, the Company will publicly announce such information as prescribed by applicable law.

2. GENERAL PROVISION

- 2.1 The Board of Directors is authorised to withdraw and amend this policy, and retains the right to deviate from this policy.