

Policy on Bilateral Contact with Shareholders

applicable to IMCD N.V.

1. INTRODUCTION

IMCD recognises and acknowledges the importance of having a meaningful dialogue with its stakeholders on their interests, concerns, and expectations for IMCD. In accordance with best practice provision 1.1.5 of the Code, IMCD has formulated a policy for an effective dialogue with stakeholders, available at IMCD's website.

Engagement may, from time to time, include bilateral contacts with shareholders or potential shareholders. The purpose of these contacts is to explain the strategy and performance of IMCD and ensure that in this way correct and adequate information is disseminated about the company.

2. BILATERAL CONTACTS WITH SHAREHOLDERS

IMCD takes the Dutch Corporate Governance Code into account when engaging in bilateral contact. During [closed periods](#) in principle no meetings will be held with and no presentations will be given to financial analysts and shareholders or potential shareholders.

3. GUIDELINES

In accordance with the Dutch Corporate Governance Code, IMCD has formulated the following principles that will apply in relation to bilateral communications with shareholders:

1. Contacts in principle occur during IMCD's general meetings of shareholders. Information in relation to the convocation, the agenda and any other matters relevant for these meetings will be disclosed on the website of the company.
2. In addition, IMCD will exchange information for the purpose of transparency via annual and half-yearly reports, interim reports, press releases and its website.
3. IMCD acknowledges that a dialogue with shareholders outside the context of a formal general meeting of shareholders can be useful.
4. IMCD will enter into a contact with shareholders in situations where the management board of IMCD is of the opinion that such a contact is in the interest of the company, provided that there is no obligation of the company to do so.
5. IMCD can request further details on the views of the shareholders requesting a dialogue and what the purpose for such dialogue is before determining if it will accept the invitation.
6. Any explanations shall be based on information which is already in the public domain.
7. IMCD does not assess, comment on or correct analyst reports or other third party reports and estimates other than with regard to factual content. In responses reference will be made to public information.
8. All contacts take place exclusively within the periods open for this purpose.
9. Bilateral contacts shall be conducted in strict compliance with the applicable rules concerning price-sensitive information, fair and non-selective disclosure and equal treatment of shareholders.

The policies included herein are drafted under the responsibility of, and approved by, [IMCD's Management Board](#).