

1 introduction

- 1.1.1 This is the policy of Aalberts N.V. (the "**Company**") regarding bilateral contacts with shareholders as required under best practice provision 4.2.2. of the Dutch Corporate Governance Code (the "**Code**").

2 general

- 2.1.1 We aim to conduct our operations in accordance with internationally accepted principles of good governance. The Company fully endorses the importance of a transparent and equal provision of information to its shareholders and other parties. In accordance with principle 4.2 of the Code, the Company therefore makes every effort to provide such parties equally and simultaneously with information relevant for shareholders, taking into account the exceptions provided by applicable law. The Company will not provide information to the general meeting of shareholders if there is an overriding interest of the Company not to disclose the information.

3 meetings and presentations

- 3.1.1 We communicate with all our shareholders, investors and analysts through the (annual) general meeting of shareholders, conference calls, roadshows and broker conferences. The Company conducts a webcast which is open to analysts, investors and other interested parties after each interim and full year results announcement. All investors, analysts and other interested parties are given the opportunity to follow the meeting in person or by webcast. Presentations during these meetings are posted on the corporate website from the start of the meeting. Analysts' meetings and presentations to investors and shareholders will not take place shortly before publication of interim or annual results.

4 bilateral contacts

- 4.1.1 We engage in bilateral contacts with shareholders. These take place either at our initiative or at the initiative of shareholders. The Company is generally represented by a member of the Management Board during these interactions.
- 4.1.2 The Company will determine at its sole discretion whether to accept invitations to engage in bilateral contacts with shareholders. The Management Board and the Supervisory Board will take into account the interests of the Company and all stakeholders when deciding whether to enter into a bilateral conversation. The Company could request a shareholder to provide written information prior to a bilateral conversation taking place. This information may include the goal of the conversation, the matters to be discussed, the opinion of the shareholder on these matters, and information on the shareholder and its shareholding interest in the Company.

5 miscellaneous

- 5.1.1 The contacts between the Management Board and financial analysts shall be handled and structured carefully and with due observance of the applicable laws and regulations. The Company shall not do anything that might compromise the independence of analysts in relation to the Company and vice versa.

- 5.1.2 The Management Board is authorised to adopt, revoke and amend this policy, subject to the approval of the Supervisory Board. The Management Board, with the approval of the Supervisory Board, and the Supervisory Board, also retain the right to deviate from this policy.

Effective as of 18 April 2019