



Code of Conduct of Fyber N.V.

Fyber N.V. (**Fyber**) plays by the rules of good business and respectable entrepreneurship. Fyber strives to comply with all applicable laws and regulations, including (but not limited to) all applicable laws and regulations regarding competition and antitrust; trade restrictions and customs; and regarding the prevention of smuggling, contraband, tax evasion, bribery, corruption, and money laundering. Fyber does not condone, facilitate or support trading in illegal goods or services or contributing to any other illegal activities.

Ethical behavior. The management of Fyber holds itself and all stakeholders accountable to high ethical standards within the applicable legal, regulatory and corporate governance framework. This includes being an equal opportunity employer; treating customers, suppliers and competitors fairly and respectfully; and taking a tough, but honest attitude in the struggle for the customers' favor in the marketplace with everything open and above board. Fyber' communications are open, accurate and transparent, taking into account business and personal circumstances where confidentiality is required. Fyber strives at acting responsibly, with honesty and integrity towards all stakeholders, including its employees, customers, suppliers and competitors.

Insider Trading Laws. Fyber strives to comply with all applicable laws and regulations regarding insider trading. Fyber' employees and any other affiliates comply with the applicable laws and regulations in this regard and, in particular, prohibits its employees and any other affiliates from the following actions (including, but not limited to the following actions): 1) buying or selling Fyber stocks or related securities for themselves or third parties; 2) passing such information along to others, so that they may do so; or 3) suggesting to third parties to buy or sell Fyber stocks or related securities. Reference is made to Fyber' **Insider Trading Policy** available on the intranet site of Fyber.

Privacy and Data Protection. Fyber strives to comply with all applicable laws and regulations regarding privacy and data protection. Fyber' employees and any other affiliates respect and protect the privacy and security of personal information of all stakeholders. Fyber takes measures to prevent any unauthorized access to such information. Reference is also made to Fyber' **Privacy Policy**.

Treatment of shareholders. Shareholders can expect the following from Fyber:

- That they will receive, in a timely way, all relevant information they need to exercise their authority.
- That the directors are aware of the indispensable role that shareholders fulfill as capital providers and of the necessity to view shareholders as important partners, both individually and collectively.
- That one of the core tasks of the directors is serving the interests of shareholders and other stakeholders in the organization (customers and society) in a balanced and consistent way.



- That both the letter and the spirit of the law and of other socially accepted guidelines are complied with. Far-reaching corporate governance principles such as the so-called 'Dutch Corporate Governance Code' will be enforced.

Reference is made to Fyber's **Policy on Bilateral Contacts** with shareholders and (potential) investors for more information in this regard.

Compliance with FYBER's code of conduct. Fyber strives at complying with this Code of Conduct at all levels within Fyber' organization. Those who do not comply with the Code of Conduct, risk disciplinary action being taken under employment law which may result in dismissal.

The latest versions of the abovementioned policies, guidelines and instructions can be found on the Company's website <https://investors.fyber.com/>.

Your Fyber Management Board