

BILATERAL CONTACTS POLICY

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1. INTRODUCTION

This is the policy of NIBC Holding N.V. (NIBC) 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 Managing Board on 9 March 2018 and approved by the Supervisory Board on 9 March 2018 with effective date 27 March 2018.

2. GENERAL PROVISIONS

- 2.1 NIBC is committed to maintaining an open and constructive dialogue with its shareholders and potential shareholders.
- 2.2 NIBC aims to keep its shareholders updated by informing them equally, simultaneously, clearly and accurately about NIBC's strategy, performance and other matters and developments that could be relevant to investors' decisions.
- 2.3 NIBC is dedicated to providing high quality and timely information to all shareholders. Information for shareholders will be made available on our website: www.nibc.com.

3. CONTACTS WITH SHAREHOLDERS

- 3.1 Conversations with shareholders will primarily take place in general meetings but may also be held on a bilateral basis.
- 3.2 NIBC will take into consideration all requests from shareholders to enter into a conversation. NIBC will agree to such requests for those situations where the Managing Board and/or the Supervisory Board deem this in NIBC's interest. The initiative to enter into a conversation with a shareholder can also be taken by NIBC.
- 3.3 In order to assess whether a conversation with shareholders could be in NIBC's interest, NIBC may request shareholders to provide certain (written) information. 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 shareholder and its interest in NIBC.
- 3.4 NIBC 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, NIBC will publicly announce such information as prescribed by applicable law.
- 3.5 A request by a shareholder to meet with one or more members of the Supervisory Board (whether or not in the presence of members of the Managing Board), shall be assessed by the Supervisory Board in

consultation with the CEO.

3.6 Bilateral meetings with (potential) shareholders will not be held during 'closed periods'.

4. CHANGES TO POLICY

4.1 The Managing Board is authorised to withdraw and amend this policy, subject to approval of the Supervisory Board.

4.2 The Managing Board, with the approval of the chairman of the Supervisory Board, and the Supervisory Board, retain the right to deviate from this policy.

5. CONTACT

For any requests for contact with NIBC or any questions about this policy or in relation to NIBC shares, its strategy, activities or financial results, please contact Investor Relations.