

Stakeholder Engagement & Bilateral Contacts Policy

Approved and adopted by the Board on 24 April 2024



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Purpose

This policy serves to lay out our approach aimed at creating long-term sustainable value while balancing the long-term interests of our stakeholders. Staying focused on what matters for our business and stakeholders, is the cornerstone of our strategy.

It is important to note that this Stakeholder Engagement & Bilateral Contacts Policy does not grant any legal rights or claims to stakeholders. Its purpose is to provide guidelines for how Flow Traders engages with stakeholders in a transparent and mutually beneficial manner.

This policy is leading, but stricter laws or regulations will prevail. This policy complements the Code of Conduct and Public Affairs Policy.

Scope

Flow Traders' Stakeholder Engagement & Bilateral Contacts Policy is established by Flow Traders Ltd. (hereafter "the Company") and applies to all employees and contingent workers and employees of our subsidiaries. Regional, business function or stakeholder specific policies on engaging with specific stakeholder groups may apply instead of, or in addition to this Stakeholder Engagement & Bilateral Contacts Policy.

We have identified the following five stakeholder groups:

- Employees within our own organization;
- Political, legislative, and regulatory actors;
- Institutional counterparties including exchanges, trading venues and prime brokers;
- Suppliers including primary market financial product issuers, data providers, goods suppliers and service providers;
- Financial and social interest parties including our shareholders and investors.

This policy also covers engagement with the stakeholder groups in our value chain related to Environmental, Social and Governance (ESG) topics. Through open dialogue, we strive to understand and address both current and emerging ESG impacts, risks, and opportunities. Our engagement seeks to assess these from two perspectives:

- impacts resulting from our business activities on our stakeholders, and
- impacts resulting from our upstream and downstream value chain on Flow Traders.

Commitment

The Company operates a comprehensive governance framework, which is upheld by the Board to the highest standards. Flow Traders remains focused on sustainable long-term value creation, governance, company culture, and risk management while balancing the interests of our stakeholders.

Within the aforementioned governance framework and commitment, the Company adheres to all relevant legal obligations relating to its business operations, its presence in the markets, its transparency, disclosure and reporting requirements and its business conduct.

Stakeholder engagement entails knowing our key stakeholders, having a trusted relationship with them and understanding their needs and concerns. By actively engaging with those impacted by our business activities, we strengthen our relationships and foster mutual interests. It will also provide an accountability mechanism, since it obliges us to involve stakeholders in identifying, understanding, and responding to societal and market issues and concerns, and to report, explain and answer to stakeholders for decisions, actions, and performance.

In addition, in accordance with Clause 6.2(a) of the board rules of the Company, the Company is committed to maintaining an open and constructive dialogue with its shareholders. Conversations with shareholders, both in general meetings and on a bilateral basis, form an integral part of this dialogue.

On a regular basis, we engage proactively in communication with our stakeholders through press releases, financial results releases, presentations, (position and/or research) papers, blogs and (briefing) calls with analysts. These will be made available on the Company's website.

For each of our Strategic ESG themes we have developed performance indicators to measure our progress against our long-term objectives. Our drive is to continuously improve and to generate long-term value for all our stakeholders. In our ESG materiality assessment, we consider the interests of our stakeholders that may be impacted by our business activities.

Key principles

Flow Traders' engagement efforts should be in line with the following principles:

- Transparent – we will be transparent in our goals, opinions and purpose of engagement.
- Expect – we have clear reasoning and expectations on our engagement and try to understand the needs, requests and issues of our stakeholders.
- Require – we require compliance with rules and regulations and our engagement helps with developing, reviewing, and improving the ecosystem we operate in.
- Cooperate – we strive to cooperate with our stakeholders and will share actual and useful information with our stakeholders.
- Inform – we inform society about what we do and why we do it.
- Constant – we engage timely and consistently with the right person in the right manner.
- Influence – we encourage change, innovation and competition.

We act on each level of engagement. It is common practice this includes the following: monitor, inform, advocate, consult, transact, negotiate, collaborate, involve, and empower.

- In identifying relevant stakeholders to engage with on a specific topic, the Engagement Owner (i.e. representatives of Flow Traders including leadership, Investor Relations, Public Affairs Corporate Affairs, Human Resources, Tax, etc.) will consider, among others, the following attributes of stakeholders in respect to the topic:
 - i. Dependency – those who are directly or indirectly dependant on our business activities.
 - ii. Responsibility - those to whom we currently have or potentially in the future may have legal, business or ethical responsibilities.
 - iii. Tension – those who need attention from us with regard to specific topics or issues.

- iv. Influence – those who may have an impact on our strategic or business decision making.
- v. Diverse perspectives – those whose views can lead to new understanding or opportunities.
- (when applicable) Engagement Owner will identify potential Engagement Counterparties (i.e. the stakeholder) for the engagement.
- Engagement Owner shall determine the most appropriate method(s) of engagement. This may include, without limitation: written correspondence, one-on-one interviews, roundtables and expert meetings, customer, supplier and investor meetings and calls, industry and investor conferences, employee meetings, portals and hotlines, community outreach programs, and governmental and regulatory interactions.

(Bilateral) Contact with shareholders and investors

The Company frequently engages in direct shareholder contacts, typically through investor forums, roadshows, broker conferences, company visits and telephone contacts. These contacts can be initiated by the Company, shareholders, potential investors, or representatives of the financial community and either take place with groups of investors or on a 1-on-1 bilateral basis. The purpose of these meetings is to provide the financial community and/or investors, with information on the Company's business operations, activities, results, and strategy, all to the extent such information does not qualify as price sensitive. During these meetings, the Company is generally represented by Investor Relations and/or (members of) the Board or trading leadership.

The Company adheres to all legal obligations relating to price sensitive information, transparency and disclosure requirements and equal treatment of shareholders. The Company has established policies regarding silent and open periods. Silent periods differ from the formal open periods in which trading of the Company's common shares by employees is permitted subject to the terms of the Company's Personal Transactions and Insider Policy, the Global Restricted Instruments Policy and any other policies of the Company that restrict the trading of the Company's common shares. Such open periods generally run for four weeks following the publication of the Company's annual, half-yearly or quarterly results.

Internal control / measures

The engagement and the output following from such engagement will be documented and where applicable, communicated with relevant internal stakeholders. If considered appropriate and follow-up is needed, we will develop an action plan that responds to the output of the engagement.

Annually, we publicly report on the key elements of the engagements to give insight into the scope and breadth of the outreach.

Responsibilities

This policy falls under the responsibility of Public Affairs, the ESG team and the Corporate Secretary.

Definitions

Engagement Owner means the representative designated by or on behalf of the Flow Traders that is conducting or initiating the engagement process on behalf of the Company, and identifies the potential Engagement Counterparties.

Engagement Counterparty means the counterparty stakeholder of the Engagement Owner in the engagement.