

**INSIDER TRADING POLICY
ON HANDLING INSIDE INFORMATION AND PRIVATE TRANSACTIONS
IN FINANCIAL INSTRUMENTS**

**Version: 2
Date: March 2025**

CONTENTS

1. Definitions	3
2. Employees' responsibility	4
3. Prohibition from Executing Transactions, Disclosure and Recommendations	4
Employees	4
4. Exemptions	5
5. Closed Period	6
6. Notification of Transactions to the AFM	7
7. Notification of Transactions to the Compliance Officer	7
8. Compliance Officer	8
9. Investigations	8
10. Insider List	9
11. Sanctions	10
12. Other provisions	10

1. Definitions

The following terms apply:

AFM	means the Dutch Authority for the Financial Markets (<i>Autoriteit Financiële Markten</i>).
Affiliated Persons	means the natural and legal persons set out in Appendix 4.
Board	means the statutory board of directors of the Company.
CEO	means the chief executive officer of the Company.
Closed Period	means a period as defined in Article 6.
Company	means the private limited liability company Fastned B.V., with corporate seat in Amsterdam, the Netherlands.
Compliance Officer	means the Director Legal and Compliance and as referred to in Article 8.
Employee	means any person employed by, or in any other type of relationship of authority to, the Company irrespective of the duration of the employment, as well as the members of the Board and the members of the management board of the Foundation.
Execute Transactions or individually a Transaction , respectively the Execution of Transactions or Transactions Executed (or any other grammatical form of the aforementioned combination of terms)	means, or respectively refers to, the action(s) to directly or indirectly and for one's own account or for the account of others, buy or sell securities or effect any other legal act aimed at acquiring or disposing securities (such as exchanging or donating securities; buying or writing options on securities; exercising options on securities; or the conversion of convertible bonds). For the prohibition of insider trading as stated in Article 3, (trying to) amend or cancel a Transaction concerning securities is also considered Executing a Transaction
PDMRs or individually an Executive	means a member of the Board and/or a member of the management team.
Fastned Securities	means: <ul style="list-style-type: none"> (a) (depository receipts for) shares in the capital of the Company; (b) other financial instruments issued by the Company within the meaning of the FSA which have been admitted to trading or for which a request for admission to trading has been made; and/or (c) other financial instruments whose value is wholly or partly determined by the value of the financial instruments referred to under (a) or (b) (e.g. options and (convertible) bonds).
FSA	means the Financial Supervision Act (<i>Wet op het financieel toezicht</i>).
Foundation	means the foundation (<i>stichting</i>) Fastned Administratie Stichting.
Inside Information	means any information of a precise nature, which has not been made public, relating, directly or indirectly, to the Company or Fastned Securities which, if made public, could have a significant effect on the price of the Fastned Securities or on the price of related derivative financial instruments. This definition does not replace the definition of Inside Information as described in article 7 of the MAR but has been simplified for the sake of readability. In a protracted process,

disclosure is required only for the final event or circumstance that constitutes inside information, unless intermediate steps themselves have a significant potential impact on security prices and therefore independently meet the criteria for inside information.

Insider	means a person who has been included in the insider list as referred to in paragraph 12.
Insider Trading Policy	means this set of rules approved and adopted by the Board, regulating the Company's policy on how to treat Inside Information and private transactions in financial instruments.
MAR	means regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation).
Personal Data	means data relating to an identifiable natural person.
PDMR	means a Person Discharging Managerial Responsibilities as defined in article 3(1)(25) of the MAR, which are (i) members of the management, supervisory and administrative bodies of the issuer or (ii) other senior-level PDMRs with regular access to inside information and the authority to make decisions that can directly or indirectly affect the prospects of securities.

2. Employees' responsibility

- 2.1 The Company is a listed company meaning every employee could obtain price-sensitive information which could be misused. This Insider Trading Policy contains rules that the Company requires its Employees to follow. However, it does not release Employees from the duty to act in accordance with applicable law. The Company requires its Employees to act in accordance with the law and a violation of the applicable rules in relation to trading in securities may give rise to disciplinary action, even if that act does not violate this Insider Trading Policy.
- 2.2 Persons that are required to make a notification pursuant to this Insider Trading Policy, such as Employees or their spouses, relatives etc., are responsible for the correctness and timeliness of the notifications required by this Insider Trading Policy and applicable law, even if the Compliance Officer conducts such notification on behalf of such person.

3. Prohibition from Executing Transactions, Disclosure and Recommendations

Employees

- 3.1 Every Employee is prohibited:
 - (a) from using Inside Information by attempting to Execute, or by Executing a Transaction in Fastned Securities if that reasonably creates the appearance that he or she did so while possessing or having access to Inside Information until that Inside Information is made public or otherwise ceases to be Inside Information, unless an exemption applies in accordance with the MAR or this policy;
 - (b) from unlawfully disclosing Inside Information to a third party, unless the disclosure is made in the normal exercise of employment, profession or duties and the recipient of the Inside Information has an obligation of confidentiality, irrespective of whether this is based on laws and regulations, provisions in articles of association, or an agreement;

- (c) from recommending or inducing third parties to trade in Fastned securities if he or she has information which as he or she knows or should reasonably know constitutes Inside Information, until that Inside Information is made public or otherwise ceases to be Inside Information;
- (d) from Executing Transactions in Fastned Securities during a Closed Period and/or in a period during which the Compliance Officer prohibits the Employee from doing so if the Compliance Officer deems it necessary to avoid the appearance of market abuse; and
- (e) from trading in securities of another company if the Employee learns in the course of his or her employment price sensitive information about the other company that is likely to affect the value of that company's listed securities. The Compliance Officer may prohibit any Employee from attempting to Execute, or Executing a Transaction in such securities at any time and for as long as he deems appropriate. The Compliance Officer shall inform the Employee concerned in writing of the prohibition.

Insiders, not being Employees

3.2 Every Insider is prohibited:

- (a) from Executing Transactions in Fastned Securities during a Closed Period and/or in a period during which the Compliance Officer prohibits the Insider from doing so if the Compliance Officer deems it necessary to avoid the appearance of market abuse;
- (b) from Executing Transactions in Fastned securities outside Closed Periods while possessing or having access to Inside Information. Exemptions to this prohibition are set out in Clause 4.

PDMRs

3.3 Every Executive is prohibited:

- (a) from Executing Transactions in Fastned Securities during a Closed Period and/or in a period during which the Compliance Officer prohibits the Executive from doing for as long as he or she deems appropriate to avoid the appearance of market abuse, irrespective of whether the Executive is using Inside Information for this purpose; and
- (b) from Executing Transactions in Fastned securities outside Closed Periods while possessing or having access to Inside Information. Exemptions to this prohibition are set out in Clause 4;

3.4 The Compliance Officer may prohibit any Employee, Insider and Executive from attempting to Execute, or Executing a Transaction in Fastned Securities at any time and for as long as he or she deems appropriate to avoid the appearance of market abuse. The Compliance Officer shall inform the Employee, Insider and Executive concerned in writing of the prohibition.

3.5 The provisions of this Article 3 shall remain applicable to the Employees, Insiders or PDMRs during the six-month period after the termination of their function/employment.

4. Exemptions

Exemptions for Employees

4.1

- (a) the award or grant of Fastned Securities under an employee scheme (e.g., the Fastned Option Plan), provided that the following conditions are met:

- (i) the employee scheme and its terms have been previously approved by the Company in accordance with national law and the terms of the employee scheme specify the timing of the award or the grant and the amount of financial instruments awarded or granted, or the basis on which such an amount is calculated and given that no discretion can be exercised;
 - (ii) the Employees respectively PDMRs concerned do not have any discretion as to the acceptance of the financial instruments awarded or granted. the award or grant of Fastned Securities under an employee scheme, provided that a pre-planned and organised approach is followed regarding the conditions, the periodicity, the time of the award, the group of entitled persons to whom the financial instruments are granted and the amount of financial instruments to be awarded, and the award or grant of financial instruments takes place under a defined framework under which any Inside Information cannot influence the award or grant of financial instruments.
- (b) the exercise of options or warrants or conversion of convertible bonds assigned to him under an employee scheme, as well as sales of the shares acquired pursuant to such exercise or conversion, provided that all of the following conditions are met:
- (i) the Company is notified about the exercise or conversion at least four months before the expiration date;
 - (ii) the decision to exercise or convert is irrevocable; and
 - (iii) the Compliance Officer has authorised the exercise or conversion prior to proceed;
- (c) the transfers or receives, directly or indirectly, of Fastned Securities, provided that the Fastned Securities are transferred between two accounts of the same person and that such a transfer does not result in a change in price of Fastned Securities;
- (d) the acquisition of qualification or entitlement of Fastned Securities, provided that the Employees concerned submit evidence to the Company of the reasons for the acquisition not taking place at another time, and the Company is satisfied with the provided explanation.
- (e) any other transactions specifically allowed under the MAR.

Exemptions for PDMRs and Insiders (not being Employees)

- 4.2 Managers and Insiders (not being Employees) are allowed to Execute a Transaction even when they have access to or possess Inside Information in the event of an obligation that has become due in good faith and is not carried out to bypass the prohibition in this Insider Trading Policy provided that:
- (a) the obligation results from an order placed or concluded before they possessed Inside Information; or
 - (b) the Transaction is carried out to satisfy a legal or regulatory obligation that arose before they possessed Inside Information.
- 4.3 Managers and Insiders (not being Employees) are allowed to, in deviation from the provisions in Clause 3.2(a) and 3.3.(a), Execute a Transaction during a Closed Period in the event of an exceptional circumstance, e.g. financial difficulty which may require the prompt sale of Fastned Securities, provided that both the Managers and Insiders can demonstrate that the relevant Transaction cannot take place at any other moment than during the Closed Period;

5. Closed Period

- 5.1 The following time periods are classified as a **Closed Period**:

- (a) the period of 30 calendar days immediately preceding the publication of the financial results of a semi-annual or quarterly report; and
 - (b) the period of 30 calendar days immediately preceding the publication of an annual report.
- 5.2 The Compliance Officer holds the responsibility for announcing which period in a financial year are Closed Periods. The Compliance Officer may announce in writing an additional Closed Period and may determine that this Closed Period must be longer if this is necessary to prevent (the appearance of) market abuse.
- 5.3 Notwithstanding the provisions in clause 7.1 and 7.2, transactions during a Closed Period are allowed if these transactions or activities depend exclusively on external factors, e.g. as mentioned in clauses 4.2 and 4.3 or that do not involve active investment decisions by PDMRs.

6. Notification of Transactions to the AFM

Notification obligations of PDMRs and their Affiliated Persons

- 6.1 PDMRs shall notify the Compliance Officer and the AFM of the number of Fastned Securities at their disposal and the number of votes they can cast on the issued capital of the Company within two (2) weeks of their designation or appointment.
- 6.2 PDMRs shall notify the Compliance Officer and the AFM immediately of any change in the number of Fastned Securities at their disposal, and of any change in the number of votes that they can cast on the issued capital of the Company.
- 6.3 PDMRs and their Affiliated Persons shall notify the AFM in writing of any transaction in Fastned Securities within three (3) business days after the date on which the Transaction has been Executed. PDMRs shall inform their Affiliated Persons about their notification obligations in writing, they shall keep a copy of this notification and they shall provide the names of the persons closely associated to them to the Compliance Officer.
- 6.4 Such notification to the AFM as referred to in Article 6.4 may be delayed until the moment that the transactions, added to the Transactions Executed by their Affiliated Persons, amount to a sum of at least EUR 20,000 in the calendar year concerned, or whatever the threshold may be prescribed by applicable law.
- 6.5 An Executive may request the Compliance Officer in writing to make a notification to the AFM as described in Clause 6.2, 6.3 or 6.4 on his or her behalf. The Compliance Officer may in turn designate an Employee, who is not an Executive, to make the aforementioned notification. The Compliance Officer shall inform the Employee concerned in writing of the designation. The Compliance Officer may withdraw the designation if he or she believes that the reason for designation has ceased to exist. The Compliance Officer shall inform the Employee in writing of the withdrawal of such designation. The Compliance Officer may also make a notification on behalf of the designated Employee.
- 6.6 PDMRs and their Affiliated Persons shall submit the notification pursuant to Clause 7.4 using the AFM form attached to this Policy as Appendix 1, which must be submitted via Cryptshare to melden@afm.nl.
- 6.7 The Compliance Officer must immediately notify the AFM in writing if a PDMR is no longer a PDMR.

7. Notification of Transactions to the Compliance Officer

- 7.1 Employees shall promptly report to the Compliance Officer any Transaction conducted by them to the Compliance Officer within three (3) business days of such Transaction.

- 7.2 Insiders shall promptly report to the Compliance Officer any Transaction conducted by them to the Compliance Officer within three (3) business days of such Transaction. Insiders shall at all times remain responsible for their compliance with the notification obligations within the applicable timeframe.
- 7.3 PDMRs and their Affiliated Persons shall promptly report to the Compliance Officer any Transaction conducted or effected by them no later than one (1) business day after the date on which the Transaction has been Executed. Managers and their Affiliated Persons shall at all times remain responsible for their compliance with the notification obligations within the applicable timeframe.
- 7.4 The internal notifications to be made by Employees, Insiders and PDMRs to the Compliance Officer pursuant to Clauses 8.1, 8.2 and 8.3 shall be made by using the form attached to this Policy as Appendix 2. In making the notifications, the questions contained in the forms must be answered in a complete and truthful manner.

8. Compliance Officer

- 8.1 The Board has appointed its Director Legal and Compliance as Compliance Officer. If the Compliance Officer is absent or otherwise unavailable or unable to perform his or her duties, the CEO will perform the function of the Compliance Officer.
- 8.2 The Compliance Officer has the duties and powers conferred by this Insider Trading Policy. The duties, and corresponding authorities, of the Compliance Officer particularly include:
- (a) providing advice and explanations, on request and on his or her own initiative, on the application of the Insider Trading Policy and the relevant legislation;
 - (b) appointing persons who may possess Inside Information on a regular or incidental basis, in consultation with the managers involved;
 - (c) processing notifications regarding intended Transactions and notifying the AFM;
 - (d) maintaining the list referred to in Article 10 concerning persons who may possess Inside Information on a regular or incidental basis;
 - (e) determining additional Closed Periods, in consultation with the Board;
 - (f) granting dispensation, in exceptional circumstances, from the prohibitions or obligations contained in the Insider Trading Policy in accordance with the MAR; and
 - (g) investigating the adherence to or possible violations of the Insider Trading Policy, in accordance with the applicable procedures within the Company.
- 8.3 The Board may confer additional duties and powers on the Compliance Officer.

9. Investigations

- 9.1 Every Employee acknowledges that the Compliance Officer is authorised to investigate all Transactions in Fastned Securities Executed by any such Employee. An Employee must provide the Compliance Officer with all information requested.
- 9.2 The Compliance Officer is entitled to investigate Transactions Executed in Fastned Securities by, under the authority of or on behalf of an Employee. All Employees are obliged to collaborate in the investigation. If requested any Employee will instruct his or her stock broker or responsible intermediary to provide the Compliance Officer with any requested information on Transactions Executed in Fastned Securities.

9.3 The Compliance Officer shall report the results of the investigation to the CEO in writing. Before reporting to the CEO, the Employee shall be entitled to respond to the results of the investigation. The CEO shall inform the Employee on the final outcome of the investigation. If the CEO is the subject of the investigation, his or her functions in relation to the investigation will be performed by the chairman of the management board of the Foundation.

10. Insider List

10.1 The Compliance Officer shall maintain a list of all persons who have access to Inside Information, and who are working for the Company under a contract of employment, or otherwise performing tasks through which they have access to Inside Information, such as advisors, accountants or credit rating agencies. The Insider List shall be promptly updated and provided to the AFM as soon as possible upon its request, through the electronic means that the AFM prescribes.

10.2 The Insider List will consist of a section related to deal-specific or event-based Inside Information, and a section for permanent insiders, i.e. individuals who have access at all times to all Inside Information. The Insider List is divided into separate sections relating to different Inside Information. New sections shall be added to the Insider List upon the identification of new Inside Information.

10.3 The Insider List shall contain:

- (a) the firstname(s), birthname(s), birthsurname(s) (if applicable) professional and personal telephone number(s), company name and address, the date of birth, the national identification number and the personal full home address of the Insiders;
- (b) the function and reason for including the Insiders in the Insider List;
- (c) the date and time at which Insiders gained access to Inside Information;
- (d) the circumstance that and the moment from which the Insiders no longer have access to Inside Information;

10.4 The Insider List and all alterations thereof shall be dated and the reason for altering will be included. The list will e.g. be altered where:

- (a) there is a change in personal information of an Insider;
- (b) there is a change in the function or reason for including an Insider already on the Insider List;
- (c) there is a new person who has access to Inside Information and needs, therefore, to be added to the Insider List; and;
- (d) there is a person who ceases to have access to Inside Information and needs, therefore, to be deleted from the Insider List.

10.5 The Compliance Officer will retain the following documents:

- (a) all notifications to the Compliance Officer pursuant to these rules;
- (b) all instructions to the Compliance Officer to make a notification as referred to in these rules; and
- (c) all requests to the Compliance Officer to grant dispensation and all dispensations as referred to in Article 9.2(f), granted by the Compliance Officer.

10.6 The Company shall be responsible for the processing of Personal Data (to be) included in the Insider List. Personal Data shall only be processed if and to the extent that it is required by and in accordance with applicable law and [Fastned's Data Protection Policy](#). Personal Data from the list may be provided to the

AFM if this is necessary for the fulfilment of a statutory obligation or if a significant interest of the Company requires this.

- 10.7 The Insider List shall be kept by the Compliance Officer for a period of at least five (5) years after the date of setting up or altering the list. The Compliance Officer shall notify the persons referred to in the list of the prohibitions of the MAR and the possible sanctions for violation of such provisions by ensuring that they receive a copy of this Insider Trading Policy .
- 10.8 Any person with regard to whom the list contains Personal Data shall have the right to inspect these data. He or she may apply to the Compliance Officer to that effect. If Personal Data are processed with regard to that person, the Compliance Officer shall within four weeks provide him or her with a full written overview of these data.
- 10.9 Any person with regard to whom the list contains Personal Data shall have the right to request the Company to correct, add, remove or block Personal Data in the list relating to him or her if these data are factually incorrect or, given the purpose of inclusion in the list, are irrelevant. The Compliance Officer shall process such a request as soon as possible and inform the requester about the action taken by him or her.
- 10.10 The Insider List shall be subject to adequate security. The Compliance Officer, his or her deputies and the Employees he or she has engaged for the processing of the list, as well as the members of the Board and the chairman of the Supervisory Board, have the right to inspect the list if this is required for the fulfilment of their duties and the correct implementation of the Insider Trading Policy.

11. Sanctions

In case of violation of one or more provisions of the Insider Trading Policy, the Company or, as the case may be, the employer reserves the right to impose any sanctions which he is entitled to impose pursuant to the law and/or the (employment) agreement with the party concerned. Such sanctions include termination of the (employment) agreement with the party involved, whether or not by way of summary dismissal. The Company and the employer may also inform the AFM and/or other authorities of their findings. In addition to the measures outlined above, the AFM oversees compliance with market abuse regulations and may impose administrative actions in case of violations. Furthermore, breaches of these regulations constitute a criminal offense and can result in criminal penalties, including imprisonment of up to six (6) years. The sanctions are further outlined in Appendix 4.

12. Other provisions

- 12.1 The Board shall have the power to take decisions in those cases which are not covered by these rules.
- 12.2 Provisions of the Insider Trading Policy may be amended and supplemented by a resolution of the Board, taking into account applicable laws and other legislation. Amendments and supplements shall enter into force upon their announcement, unless the announcement specifies a later date.
- 12.3 The Insider Trading Policy is governed by Dutch law.
- 12.4 These rules will be posted on the Company's website.
- 12.5 This Insider Trading Policy takes effect on 1 February 2025 and replaces the 2017 policy.

APPENDIX 1 – notification form of trades to the AFM

AFM meldingsformulier MAR 19 - Openbaarmaking van transacties door leidinggevenden



LET OP: Vanaf 3 juli 2016 accepteert de AFM uitsluitend **digitaal** ingevulde meldingsformulieren!

Het volledig ingevulde meldingsformulier dient u te mailen aan melden@afm.nl

1. Gegevens persoon met leidinggevende verantwoordelijkheden/persoon nauw gelieerd	
a) Naam	
<p><i>Voor natuurlijke personen: voor- en achternaam (achternamen);</i></p> <p><i>Voor rechtspersonen: volledige naam met de rechtsvorm als vermeld in het register waarin de rechtspersoon is ingeschreven, indien van toepassing.</i></p>	
2. Reden voor de melding	
a) Positie/ Status	
<p><i>Voor personen met leidinggevende verantwoordelijkheden: vermelding van de positie die de persoon bekleedt (bv. CEO, CFO, etc.)</i></p> <p><i>Voor nauw gelieerde personen:</i></p> <p><i>-vermelding dat de melding betrekking heeft op een persoon</i></p> <p><i>Die nauw gelieerd is aan een persoon met leidinggevende verantwoordelijkheden;</i></p> <p><i>-naam en positie van de desbetreffende persoon met leidinggevende verantwoordelijkheden.</i></p>	
b) Nieuwe melding of correctie eerdere melding?	
<p><i>Vermelding dat het een eerste melding dan wel een correctie van een eerdere melding betreft. In geval van correctie, geef toelichting over de fout die met deze mededeling wordt gecorrigeerd..</i></p>	

3.	Gegevens uitgevende instelling, deelnemer emissierechtenmarkt, veilingplatform, veilingmeester of veilingtoezichthouder	
a)	Volledige naam entiteit	
b)	LEI <i>Identificatiecode voor juridische entiteiten in overeenstemming met de ISO 17442 LEI-code</i>	
4.	Gegevens over de transactie(s): onderdeel dat moet worden herhaald voor: i) elk soort instrument; ii) elk soort transactie; iii) elke datum, en iv) elke plaats waar transacties zijn verricht	
a)	Beschrijving financieel instrument, soort instrument <i>Vermelding over de aard van het instrument:</i> <ul style="list-style-type: none"> - een aandeel, een schuldinstrument, een derivaat of een financieel instrument dat verbonden is aan een aandeel of een schuldinstrument, - een product van een emissierechtenmarkt, een product van een veiling dat gebaseerd is op een emissierecht of een derivaat met betrekking tot een emissierecht. 	1.
		2.
		3.
		4.
		5.
		6.
	Identificatiecode instrument (ISIN)	1.
		2.
		3.
		4.
		5.
		6.
b)	Aard/ soort transactie (bv. aankopen, verkopen, opnemen en verstrekken van leningen, ...) <i>Beschrijving van het soort transactie, met gebruik, indien van toepassing, van het soort transactie zoals omschreven in artikel 10 van Gedelegeerde Verordening (EU) 2016/522 van de Commissie(1), vastgesteld krachtens artikel 19, lid 14, van Verordening (EU) nr. 596/2014 of een specifiek voorbeeld omschreven in artikel 19, lid 7, van Verordening (EU) nr. 596/2014.</i>	1.
		2.
		3.
		4.
		5.
		6.

	Transactie in het kader van uitoefening van een aandelenoptieprogramma? JA/ NEE	1.		
		2.		
		3.		
		4.		
		5.		
		6.		
c)	Prijs (prijzen) en volume(s) <i>Wanneer meer dan een transactie van dezelfde aard (aankopen, verkopen, opnemen en verstrekken van leningen, ...) over een zelfde financieel instrument worden verricht op dezelfde dag en op dezelfde plaats van transactie, worden de prijzen en de volumes van deze transacties in dit veld gerapporteerd in de vorm van twee kolommen, zoals hierboven voorgesteld, met het aantal lijnen dat nodig is.</i>		Prijs (Prijzen)	Volume(s)
		1		
		2		
		3		
		4		
		5		
		6		
d)	Geaggregeerde informatie: <ul style="list-style-type: none"> • Geaggregeerd volume • Prijs <i>De volumes van meerdere transacties worden geaggregeerd wanneer deze transacties:</i> <ul style="list-style-type: none"> -betrekking hebben op hetzelfde financieel instrument of emissierecht; -van dezelfde aard zijn; - op dezelfde dag worden verricht, en - op dezelfde plaats van transactie worden verricht. <i>Prijsgegevens:</i> <ul style="list-style-type: none"> -in geval van een enkele transactie, de prijs van deze transactie; - in geval de volumes van meerdere transacties geaggregeerd 		Volume (geaggregeerd)	Prijs (gewogen gemiddelde prijs)
		1.		
		2.		
		3.		
		4.		
		5.		
		6.		

	<i>worden: de gewogen gemiddelde prijs van de geaggregeerde transacties.</i>	
e)	Datum van de transactie <i>Datum van de specifieke dag van uitvoering van de aangemelde transactie. Gebruikmakend van het SO 8601 datumformaat: JJJJ-MM-DD</i>	1.
		2.
		3.
		4.
		5.
		6.
f)	<u>Handelsplatform (!)</u> van de transactie <i>Naam en code voor identificatie van het MiFID-handelsplatform, de beleggingsonderneming met systematische interne afhandeling of het georganiseerde handelsplatform buiten de Unie waar de transactie is uitgevoerd, zoals gedefinieerd krachtens de Gedelegeerde verordening van de Commissie tot aanvulling van Verordening (EU) nr. 600/2014 van het Europees Parlement en de Raad met betrekking tot technische reguleringsnormen voor het melden van transacties aan bevoegde autoriteiten, vastgesteld krachtens artikel 26 van Verordening (EU) nr. 600/2014, of indien de transactie niet is uitgevoerd op een van de bovengenoemde handelsplatforms, vermeld „buiten een handelsplatform”.</i>	1.
		2.
		3.
		4.
		5.
		6.

Opmerkingen:

or download the form by using the following link:

<https://www.afm.nl/nl-nl/sector/effectenuitgevende-ondernemingen/meldingen/transacties-leidinggeve-nden>

APPENDIX 2 – Internal notification form of trades to the Compliance Officer

	Details of the person	
1	Name¹	
2	Reason for the notification	
a)	Position/status	
b)	Initial notification/Amendment	
3	Details of the issuer	
a)	Name	Fastned B.V.
b)	LEI	7245000V8JJ8CE1L8G60
4	Details of the transactions (use a new form for each type of instrument, transaction and date)	
a)	Type of instrument	
b)	Nature of the transaction	
c)	Price	
d)	Volume	
e)	Aggregated information	Price: Volume:
f)	Date of transaction	
g)	Place of transaction	
	Date:_____	Signature:_____

¹ For natural persons: the first name and the last name(s). For legal persons: full name including legal form as mentioned in the deed of registration/incorporation.

APPENDIX 2 – Summary Table

	Employees	Insiders (not being Employees)	PDMRs (and their Affiliated Persons)
Prohibition on insider trading	x	x	x
Closed Periods applicable	x	x	x
Included on Insider List	x	x	x
Internal notification obligation to Compliance Officer	x	x	x
External notification from C.O. to AFM			x

APPENDIX 3 – Sanctions

In the event of a violation of section 14 of the MAR, the AFM may impose an administrative fine, being:

- a maximum of 5 million euro to private individuals (*natuurlijk persoon*); and
- a maximum of 15 million euro or 15% of the annual consolidated revenue to legal persons (*rechtspersoon*).

Pursuant to Dutch law, the violation of the MAR is considered to be an economic offence as described in the Law Economic Offences (*Wet Economische Delicten*). The latter law divides the economic offence into two categories.

In the event of **serious offence (*misdrif*)** the maximum criminal penalties are:

- (i) imprisonment for a maximum of six (6) years;
- (ii) community service; or
- (iii) a fine* of the fifth category (with a maximum amount of € 103.000).

*If the value of assets in relation to which the criminal offence has been committed, or which have been obtained wholly or partly by the economic offence, exceeds one-fourth (1/4) of the aforementioned fine of € 103.000, a fine of the next category being the sixth category may be imposed (resulting in a fine with a maximum of € 1.030.000 instead).

*If the convicted person is a legal entity, a maximum fine of the sixth category applies (being a maximum of € 1.030.000) under normal circumstances or, in case of special circumstances, a revenue related fine with a maximum of 10% of the annual revenue, if the originally set maximum fine for this offence is not considered an appropriate sanction.

In the event of a **minor offence (*overtreding*)** the maximum criminal penalties are:

- (i) detention (*hechtenis*) for a maximum of one (1) year;
- (ii) community service; or
- (iii) a fine* of the fourth category (with a maximum amount of € 25.750).

*If the value of assets in relation to which the criminal offence has been committed, or which have been obtained wholly or partly by the economic offence, exceeds one-fourth (1/4) of the aforementioned fine of € 25.750, a fine of the next category being the fifth category may be imposed (resulting in a maximum of € 103.000 instead).

If the convicted person is a legal entity, a maximum fine of the fifth category applies (being a maximum of € 103.000) under normal circumstances or, in case of special circumstances, a maximum fine of the sixth category with a maximum of € 1.030.000 applies instead.

Members of the Board and other PDMRs that are obliged to notify their transactions in Fastned Securities should be aware that the following persons who are closely associated to them are under a statutory obligation to notify the AFM when they Execute a Transaction in Fastned Securities:

- (a) a spouse, or a partner considered to be equivalent to a spouse in accordance with Dutch law;
- (b) a dependent child, in accordance with Dutch law;
- (c) a relative who has shared the same household for at least one year on the date of the transaction concerned; or
- (d) legal entities, trusts as referred to in Section 1 under c of the Act on the Supervision of Trust Offices (*Wet toezicht trustkantoren*) or partnerships:
 - (i) whose executive responsibility is vested in;
 - (ii) which is directly or indirectly controlled by;
 - (iii) which has been created for the benefit of; or
 - (iv) whose economic interests are essentially equivalent to those of,
an Executive or the person referred to in (a) to (c) inclusive,