

Effective from 1 January 2025

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INSIDER DEALING CODE

17 January 2025 – With effect from 1 January 2025

Version 1.0

1. Introduction

This Insider Dealing Code (the '**Code**') is established by Lavide Holding N.V. ('**Lavide**' or the '**Company**'), a public limited liability company with its shares listed on Euronext Amsterdam. The purpose of this Code is to ensure compliance with applicable laws and regulations related to insider dealing and to promote ethical behaviour among directors, officers, employees, and other stakeholders.

2. Scope and Application

This Code applies to all directors, officers, employees, and consultants of Lavide, as well as any other persons who have access to inside information ('**Insiders**'). Compliance including any employee or associate affiliated with the business organisation of Lavide's external accountant) with this Code is mandatory, and any violations may result in disciplinary actions, including termination of employment or contract, and may also lead to legal consequences.

3. Definition of Inside Information

Inside information is defined as non-public information relating to Lavide, its subsidiaries, or any other publicly traded company, which, if made public, could significantly impact the price of the company's shares. Examples of inside information include, but are not limited to:

- Financial results and forecasts
- Mergers, acquisitions, or divestitures
- Significant contracts or business developments
- Changes in senior management
- Litigation or regulatory investigations

4. Prohibited Activities

Insiders are prohibited from engaging in the following activities:

- Trading in Lavide's shares or the shares of any other publicly traded company based on inside information
- Recommending or suggesting to others to trade in shares based on inside information
- Disclosing inside information to any unauthorised person

5. Trading Windows and Blackout Periods

To prevent insider dealing, Lavide has established trading windows and blackout periods during which Insiders may or may not trade Lavide's shares.

5.1 Trading Windows

Insiders are allowed to trade Lavide's shares only during designated trading windows, which are typically open for a limited period following the public release of the Company's financial results.



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5.2 Blackout Periods

Blackout periods are times when trading by Insiders is prohibited due to the possession of inside information. These periods typically occur before the release of financial results or other significant announcements.

6. Pre-Clearance of Trades

Before engaging in any transaction involving Lavide's shares, Insiders must obtain pre-clearance from the Company's Compliance Officer, or in the absence of a Compliance Officer, the Chief Executive Officer of Lavide. The pre-clearance process involves submitting a request specifying the details of the intended trade, and the Compliance Officer will review and approve or deny the request based on the applicable rules and regulations.

7. Reporting Obligations

Insiders are required to report their transactions in Lavide's shares to the Compliance Officer within 24 hours of the transaction. The Company will then disclose these transactions to the relevant regulatory authorities if required by law.

8. Confidentiality and Security of Inside Information

Insiders must maintain the confidentiality of inside information and ensure that it is not disclosed to any unauthorised persons. Measures should be taken to protect the security of such information, including:

- Storing documents and files securely
- Limiting access to inside information to authorised personnel only
- Using secure communication channels when discussing inside information

9. Training and Awareness

Lavide is committed to promoting awareness and understanding of this Code among its Insiders. The Company will provide regular training sessions and updates on insider dealing regulations and best practices. Insiders are encouraged to participate in these training sessions and stay informed about their obligations under this Code.

10. Monitoring and Enforcement

The Compliance Officer is responsible for monitoring compliance with this Code and taking appropriate action in case of any violations. The Company will conduct regular audits and reviews to ensure adherence to this Code. Any suspected or actual breaches of this Code should be reported immediately to the Compliance Officer.

11. Amendments to the Code

Lavide reserves the right to amend or update this Code at any time to reflect changes in laws, regulations, or best practices. Insiders will be notified of any amendments, and it is their responsibility to comply with the updated Code.



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12. Contact Information

For any questions or concerns regarding this Code, Insiders should contact the Compliance Officer at:

Bart Joosen

bart.joosen@outlook.com

06-46224860

13. Acknowledgement

All Insiders are required to acknowledge that they have read, understood, and agreed to comply with this Code. The acknowledgement should be provided in writing and submitted to the Compliance Officer.

Effective Date: 1 January 2025

This Insider Dealing Code is hereby adopted by the Board of Directors of Lavide Holding N.V. on 17 January 2025

Ondertekend door:

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Thijs Groeneveld

CEO
21-1-2025

Signed by:

C354864C3C60449...
Mario Natella

COO
21-1-2025