

BinckBank code of conduct

Principles

This document puts into effect the best practice provision II.1.3 (b) of the Dutch Corporate Governance Code of 9 December 2003 (“the Code”). The Code of Conduct sets forth the basic principles for the conduct of each individual who fulfils a position at BinckBank, including employees, managers, directors and supervisory directors. This Code of Conduct is not comprehensive and formulates only minimum values that must be interpreted within the framework of local legislation and practices.

BinckBank expects its employees to put the following four company-wide core values into practice:

1. Service and customer focus

“Surprise the customer”

Each employee must operate based on the BinckBank philosophy: The customer is the focus. Each individual employee must work within the pre-determined parameters, live up to agreements and persevere in the face of obstacles and setbacks. Our employees’ aim is to positively surprise (internal and external) customers with the service, transparency and integrity provided.

2. Quality

“No. 1 online bank for investors in Europe”

Employees deliver the desired quality at the right moment. The employee’s development progresses in line with the organisation’s development.

3. Passion and pleasure

“Work hard, play hard”

Employees work with passion and pleasure. They are proud of who we are and what we achieve together. Employees are open and honest and always have a wide viewpoint.

4. Cost-conscious

“Not a big bank, but BinckBank”

BinckBank employees operate efficiently and effectively in order to ensure all costs remain as low as possible in both the short-term and long-term. They are economical and handle BinckBank’s money responsibly.

BinckBank furthermore observes the following house rules:

Employees

BinckBank provides a safe and healthy working environment. Employees are treated with dignity and respect. Cultural differences between the countries in which BinckBank operates are recognised and respected. All BinckBank employees and all applicants applying for a position at BinckBank are offered equal opportunities without discrimination on grounds of gender, race or religion. Employees of BinckBank are allowed to join the trade union of their choice. The minimum age for being hired to work will not be below the mandatory school age in accordance with national legislation and will in any case not be below fifteen years of age.

Resources

The assets and other resources of BinckBank and its customers must be handled with care. Business opportunities that arise must be seized in order to achieve BinckBank’s objectives and not for personal gain. In the event of a conflict of interest, the related employee must bring this to the attention of his or her manager.

Confidentiality

Confidential information is defined as information that is not generally known outside the BinckBank organisation and that could, should it be made known to the public, harm the interests of BinckBank, its shareholders, customers and/or employees. Employees of BinckBank are expected to ensure that confidential information is not disclosed to persons outside of the organisation.

Compliance

BinckBank has adopted regulations in accordance with that prescribed in the applicable securities legislation and regulations in order to promote and monitor the integrity of its employees. The regulations currently in place concern private investment transactions and the prevention of market abuse. BinckBank ensures strict compliance with these regulations. In the event of violations, BinckBank reserves the right to dismiss with immediate effect the employee or employees concerned and to submit all relevant information relating to the violation to the supervisory bodies. BinckBank is also at liberty, providing there is reason to do so, to notify the Dutch Public Prosecution Service.

Honest reporting

BinckBank's accounting and official reporting must be accurate, truthful, complete and in compliance with all applicable laws and regulations. It must furthermore fulfil all applicable accounting standards.

Whistleblowers' Charter

On the grounds of the Whistleblowers' Charter in force at BinckBank, employees can report suspected irregularities as stated in best practice provision II.1.6 of the Code without endangering their legal position.

Duty to report

Based on the applicable regulations for promoting orderly operation of the securities markets, employees are required to inform the compliance officer should they identify (orders for) securities transactions that in their opinion contravene the aforementioned orderly operation of the securities markets.

Business gifts and favours

It occurs within the sector in which BinckBank operates that business associates invite employees to attend events or other activities and give business gifts. In order to avoid the semblance of a conflict of interest, gifts with a value of more than € 100.00 may only be accepted after receiving approval from the compliance officer. Gifts must be delivered to the office address. All invitations for events must be submitted to the manager.

Conclusion

This Code of Conduct contains the main points regarding the way in which employees are expected to think and act at BinckBank. It is each employee's individual responsibility to fulfil this general line of conduct in the correct manner. Violation of these rules may lead to dismissal or criminal prosecution. Closely monitoring and providing professional-related advice is a collective task. Directors, supervisory directors and the management have particular duty in this respect and express this responsibility through, among other things, exemplary behaviour and initiatory and assessment activities.



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