

---

**ORDINA N.V.**

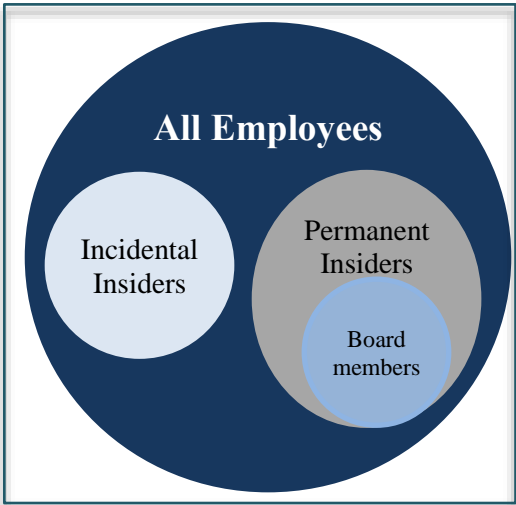
**INSIDER TRADING POLICY**

**adopted by the Management  
Board on 7 December 2021**

---

**INTRODUCTION TO THE ORDINA INSIDER TRADING POLICY**

- (A) This policy aims to promote compliance with the relevant obligations and restrictions under the MAR. The MAR sets out obligations for Ordina and its Employees with respect to the ownership of, and transactions in, Ordina Securities. The MAR also requires Ordina to keep a list of persons who, on a regular or incidental basis, may have Inside Information.
- (B) This policy contains specific rules for (i) Employees; (ii) incidental Insiders; (iii) permanent Insiders; and (iv) Board members. Each member of the Management Board and Supervisory Board qualifies as a "Board member".
- (C) You are an "Insider" if the Compliance Officer has designated you as such. The Compliance Officer will do so if you have access to Inside Information on a permanent basis, in which case you will be a "permanent Insider", or if you have temporary access to Inside Information in connection with a project or matter you are working on, in which case you will be an "incidental Insider". Persons that are designated as an Insider shall be notified of such designation and shall be required to acknowledge in writing the legal and regulatory duties entailed. The obligations of Insiders apply to you as long as you are an Insider and are included on the Insider List.
- (D) All persons that are employed by Ordina that do not qualify as an Insider or a Board member should comply with the rules that apply to Employees.
- (E) The following table summarises which obligations apply to Employees, Insiders and Board members. The obligations are further set out in this policy and should be carefully read by each Employee.



	Employees	Insiders	Board members
<b>Prohibition on insider trading</b>	X	X	X
<b>Closed Periods applicable</b>		X	X
<b>Included on Insider List</b>		X	X
<b>Notification obligation</b>			X
<b>Sign declaration of agreement</b>			X

- (F) Non-compliance with the provisions of this policy may lead to internal disciplinary measures and to administrative or criminal sanctions or penalties.
- (G) Each Employee is responsible for his or her compliance with this policy, but in case of questions you may contact the Compliance Officer of Ordina, whose contact details are made available via Connect. However, Employees remain responsible for compliance with this policy and applicable law, and should obtain their own legal advice if required or appropriate.

## **1. OBLIGATIONS FOR EMPLOYEES**

- 1.1. Employees who have Inside Information are prohibited from Trading in Ordina Securities 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.
- 1.2. Employees who have Inside Information are prohibited from recommending or inducing third parties to Trade in Ordina Securities until that Inside Information is made public or otherwise ceases to be Inside Information.
- 1.3. Employees are prohibited from unlawfully disclosing Inside Information to a third party, unless the disclosure is made in the normal exercise of employment, profession or duties.

## **2. OBLIGATION FOR BOARD MEMBERS**

- 2.1. Board members are prohibited from Trading during Closed Periods, unless they act in accordance with the conditions set out in Appendix V.
- 2.2. Outside Closed Periods, Board members are allowed to Trade, unless they have Inside Information. Certain exemptions to this prohibition apply pursuant to paragraph 5 of this policy.
- 2.3. The Compliance Officer may from time to time determine that Board members are prohibited from Trading if this is necessary in order to avoid the appearance of market abuse.
- 2.4. The prohibitions set out in this policy remain applicable to Board members during the six-month period after the termination of their function.
- 2.5. Board members must send a signed copy of the '*Declaration of agreement with the Ordina Insider Trading Policy*', attached as Appendix I to this policy, to the Compliance Officer within two weeks of commencement of their position as Board member.
- 2.6. Board members and their Affiliated Persons must report each Trade conducted for their own account to the Compliance Officer no later than the first business day following the date of such Trade in accordance with the terms set out in Appendix VI.
- 2.7. The Compliance Officer shall disclose or shall report to the AFM all Trades that have been reported in accordance with paragraph 2.6 above within three business days after the date on which the total amount of the Trades concerned has reached a relevant notification threshold prescribed by applicable law.

### **3. OBLIGATIONS FOR INSIDERS, NOT BEING BOARD MEMBER**

- 3.1. Insiders are prohibited from Trading during Closed Periods, unless they act in accordance with the conditions set out in Appendix V.
- 3.2. Outside Closed Periods, Insiders are allowed to Trade unless they have Inside Information. Certain exemptions to this prohibition apply pursuant to paragraph 5 of this policy.
- 3.3. The Compliance Officer may from time to time determine that Insiders are prohibited from Trading if this is necessary in order to avoid the appearance of market abuse.
- 3.4. The prohibitions set out in this policy remain applicable to Insiders during the six-month period after the termination of their function.
- 3.5. Insiders must report to the Compliance Officer each Trade for their own account promptly and no later than three business days after the date of such Trade.

### **4. CLOSED PERIODS**

- 4.1. The Compliance Officer is responsible for announcing which periods in a financial year are Closed Periods.
- 4.2. "**Closed Periods**" are:
  - 4.2.1. the period commencing 30 calendar days before the publication of an interim financial report or a year-end report, provided that the Compliance Officer may determine that this period must be longer if this is necessary to prevent market abuse or the appearance thereof; and
  - 4.2.2. such other periods as the Compliance Officer may designate for any Insider or Board member or group of Insiders or Board members if necessary to prevent market abuse or the appearance thereof.

### **5. EXCEPTIONS FOR BOARD MEMBERS AND INSIDERS**

- 5.1. Employees are allowed to Trade even when they possess Inside Information, if the Trade is carried out in the discharge of an obligation that has become due in good faith and not to circumvent the prohibition against insider trading, and if:
  - 5.1.1. the obligation results from an order placed or an arrangement concluded before they possessed Inside Information; or
  - 5.1.2. the Trade is carried out to satisfy a legal or regulatory obligation that arose before they possessed Inside Information.

### **6. INSIDER LIST**

- 6.1. The Compliance Officer shall maintain for Ordina:
  - 6.1.1. a Permanent Insider List; and

- 6.1.2. Project Insider Lists, as and when required.
- 6.2. An Insider will only be added to the Permanent Insider List if they have access at all times to all Inside Information (that is, they will always have access to all Inside Information immediately). If a person is included on the Permanent Insider List, he/she will not be included on any Project Insider List.
- 6.3. Certain Personal Data of Insiders must be recorded on the Insider List, including each Insider's full name, birth surname if different, date of birth, national identification number (if applicable), home address, work telephone number and all personal telephone numbers.
- 6.4. Insiders must inform the Compliance Officer if any of their Personal Data changes while they are included on the Insider List.
- 6.5. The Insider List shall contain:
  - 6.5.1. the dates and times on which the Insider gained access to the Inside Information;
  - 6.5.2. the date on which the Insider List was compiled and updated;
  - 6.5.3. the circumstance that, and the moment from which, an Insider no longer has access to Inside Information; and
  - 6.5.4. all instructions from and notifications to the Compliance Officer pursuant to this policy.

## **7. SANCTIONS**

- 7.1. In the event of a breach of any provision of this policy, Ordina reserves the right to impose any sanctions which it is permitted to impose pursuant to applicable law and/or the terms of employment applicable to the relevant Employee. Such sanctions may include the termination of employment by way of summary dismissal or otherwise. Ordina may also inform the AFM and/or any other authorities of its findings. A violation of these rules can be punishable by imprisonment or a fine.
- 7.2. A description of the sanctions and penalties for a breach of the relevant provisions of the MAR and MAD2, as implemented in the Financial Supervision Act, is attached to this policy as Appendix III.

## **8. COMPLIANCE OFFICER**

- 8.1. The Management Board shall designate a Compliance Officer. The Management Board may at any time revoke the designation of the Compliance Officer. The Compliance Officer may, with the approval of the Management Board, designate one or more deputies.
- 8.2. Subject to applicable law, the Compliance Officer may grant dispensations and exceptions to any of the rules, restrictions and obligations under this policy. The Compliance Officer may only grant a dispensation or exception to himself or herself with the prior written approval of the Management Board.

## **9. MISCELLANEOUS**

### **9.1. Situations not covered by this policy**

The Management Board shall have the right to take decisions in any circumstances not covered by this policy, provided that it does so in accordance with applicable law.

### **9.2. Conflict with applicable law**

If applicable law mandatorily prescribes a more strict rule, restriction or obligation than a provision of this policy, the more strict rule, restriction or obligation under applicable law prevails.

### **9.3. Effective date**

This policy enters into force on 8 december 2021.

### **9.4. Amendments**

The provisions of this policy may be amended and supplemented by a resolution of the Management Board. Amendments and additions shall enter into force on the date on which they are announced, unless the announcement specifies otherwise.

### **9.5. Dutch law**

This policy is governed by Dutch law.

### **9.6. Jurisdiction**

The competent court in Utrecht], the Netherlands shall have exclusive jurisdiction to settle any dispute in connection with this policy, and any agreements resulting therefrom unless such agreement explicitly provides otherwise, without prejudice to the right of appeal, including an appeal to the Supreme Court of the Netherlands. The term "dispute" shall be deemed to include disputes that are wholly or partially based on non-contractual principles or relate to nullity, nullification or existence of the policy or any legal act.

*remainder of page intentionally left blank*

**APPENDIX I - DECLARATION OF AGREEMENT WITH THE ORDINA INSIDER TRADING POLICY (ONLY APPLICABLE TO BOARD MEMBERS)**

**The undersigned:**

Last name: .....

First name: .....

Employed by Ordina:

- Declares that he/she received a copy of the Ordina insider trading policy, familiarised him/herself with the contents thereof, including the sanctions applicable to insider trading and unlawful disclosure of Inside Information, and that he/she will comply with the provisions of such policy.
- Declares that he/she notified his/her Affiliated Persons of their reporting obligations under the MAR as set out in Appendix VI of the Ordina insider trading policy by providing them with a copy of the Ordina insider trading policy, and has kept a copy of such notification.
- Agrees that the Compliance Officer is entitled to hold an inquiry with respect to the holding of and effecting Trades or ensure that an inquiry be held and report in writing on the outcome thereof, but only after he/she has been given the opportunity to respond to the outcome of the inquiry.
- Declares that he/she will at all times remain ultimately responsible for compliance with applicable securities laws.
- States that, on the date that this statement was signed he/she owns [*number*] [shares / options to acquire shares] in Ordina.

Capitalised terms used in this declaration have the meaning ascribed to them in the Ordina insider trading policy.

Place:

Date:

Name:

Signature:

## APPENDIX II - DEFINITIONS

"**Affiliated Persons**" means:

- (a) spouses, registered partners, or life companions of a Board member if in a marriage or registered partnership;
- (b) children under the authority of a Board member, or children for whom such person has been appointed as guardian;
- (c) other relatives by blood or otherwise of a Board member who on the date of the transaction concerned have maintained a joint household with him or her for at least one year; and
- (d) legal persons, trusts or partnerships:
  - (i) whose executive responsibility is vested in a Board member or in a person referred to under (a), (b) or (c) above;
  - (ii) which is directly or indirectly controlled by a Board member;
  - (iii) which has been created for the benefit of Board member or a person referred to under (a), (b) or (c) above; or
  - (iv) whose economic interests are essentially equivalent to those of a Board member or a person referred to under (a), (b) or (c) above.

"**AFM**" means the Netherlands Authority for the Financial Markets (*Autoriteit Financiële Markten*).

"**Closed Periods**" has the meaning ascribed to it in clause 4.2 of this policy.

"**Compliance Officer**" means the person designated as Ordina's compliance officer pursuant to clause 8.1 of this policy.

"**Employee**" means any person employed by, or in any other form of relationship of authority to, Ordina or a subsidiary of Ordina, irrespective of the duration of the employment, including Board members.

"**ESMA**" means the European Securities Markets Authority.

"**Financial Supervision Act**" means the Dutch Financial Supervision Act (*Wet op het financieel toezicht*) and any ancillary rules, decrees and regulations thereto, as amended from time to time.

"**Inside Information**" has the meaning ascribed thereto in the MAR, i.e. information of a precise nature, which has not been made public, relating, directly or indirectly, to Ordina or to listed Ordina Securities and which, if it were made public, would be likely to have a significant effect on the price of Ordina Securities. Examples include: non-public information regarding annual or semi-annual results, planned mergers or takeovers, planned share



issuances, changes in the composition of the Management Board or Supervisory Board and the introduction of new products or services by Ordina.

**"Insider"** means an Employee, not being a Board member, or other person who has access to Inside Information in the exercise of his or her duties or has been designated as such by the Compliance Officer.

**"Insider List"** means the Permanent Insider List and any Project Insider List.

**"Insider List Implementing Regulation"** means implementing regulation on the format of insider lists (2016/347/EU).

**"MAD2"** means Directive 2014/57/EU of the European Parliament and of the Council of 16 April 2014 on criminal sanctions for market abuse, including all legislation promulgated thereunder, as amended from time to time.

**"Management Board"** means the management board of Ordina.

**"Board member"** means each member of the Management Board and Supervisory Board;

**"MAR"** means Regulation No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC, including all legislation promulgated thereunder, as amended from time to time.

**"Ordina"** means Ordina N.V., a public limited liability company (*naamloze vennootschap*), incorporated under the laws of The Netherlands, with its corporate seat in Nieuwegein, and, unless the context requires otherwise, its subsidiaries and group companies.

**"Ordina Securities"** means shares or securities of Ordina or other financial instruments the value of which is determined by, or has an effect on, such shares or securities of Ordina or such financial instruments in each case within the meaning of Section 1:1 of the Financial Supervision Act, which have been admitted to trading on a regulated market, a multilateral trading facility or an organised trading facility in the Netherlands or another Member State of the European Union, or for which a request for admission to trading on such market or trading facility has been made.

**"Permanent Insider List"** means a list including all persons (if any) having access to all Inside Information relating to Ordina at all times in the form set out in Template 2 of Annex I of the Insider List Implementing Regulation.

**"Personal Data"** means the information relating to an Employee as set out in paragraph 6 of this policy processed for the purposes specified in Appendix IV.

**"Project Insider List"** means sections of the Insider List showing all persons having access to deal-specific or event-based Inside Information relating to Ordina as set out in Template 1 of Annex I of the Insider List Implementing Regulation.

**"Supervisory Board"** means the supervisory board of Ordina.

**"Trading"** or **"Trade"** means directly or indirectly executing or attempting to execute a transaction relating to Ordina Securities, including buying, selling and receiving securities, buying, writing and receiving options, exercising options, converting convertible bonds and cancelling or amending a transaction in Ordina Securities whether for a person's own account or for the account of a third party.

## APPENDIX III - REGULATORY FRAMEWORK

### 1. PROHIBITIONS

#### Section 14 of the MAR:

*A person shall not:*

- (a) *engage or attempt to engage in insider dealing;*
- (b) *recommend that another person engage in insider dealing or induce another person to engage in insider dealing; or*
- (c) *unlawfully disclose inside information.*

### 2. SANCTIONS

#### Administrative sanctions

In the event of a violation of Section 14 of the MAR, the AFM can decide to impose an administrative fine:

- of maximum €5,000,000 to private individuals; and
- of maximum €15,000,000 or 15% of the annual consolidated turnover to legal persons.

The AFM will publish the decision to impose the fine.

#### Criminal sanctions<sup>1</sup>

Under Dutch law, violation of Section 14 of the MAR constitutes as a serious offence (*misdrif*) if the violation is made intentionally, or as a minor offence (*overtreding*) if the violation is not committed intentionally. The maximum sentences differ accordingly:

- in case of a serious offence, with respect to private individuals, the maximum criminal penalties that can be imposed are a prison sentence (*hechtenis*) of a maximum of six years, a community service order (*taakstraf*) and/or a fine with a maximum amount of €87,000, or under certain circumstances €870,000.
- in case of a minor offence, with respect to private individuals, the maximum criminal penalties that can be imposed are a prison sentence of a maximum of one year, a community service order and/or a fine up to a maximum of €21.750, or under certain circumstances €87,000.

---

<sup>1</sup> The maximum amounts of the different fine categories that are mentioned in this paragraph apply as of 1 January 2020. The maximum amounts of the fine categories are adjusted every two years to the consumer price index.

## **APPENDIX IV – PROCESSING OF PERSONAL DATA**

This Appendix IV concerns the protection of Personal Data processed in the context of this policy. Ordina will process Personal Data in accordance with the Ordina Employee Privacy Policy. This Appendix IV is a specific supplement to the Ordina Employee Privacy Policy. In case of any inconsistencies between these two policies, this Appendix IV will prevail as regards the processing of Personal Data within the framework of this policy.

The object of this Appendix IV is to describe how, why and in which manner Ordina processes Personal Data. Ordina strives to be compliant with Regulation (EU) 2016/679 (the General Data Protection Regulation, hereinafter: the "GDPR") and the applicable implementing act(s) based thereon.

### **Processing Personal Data**

Ordina shall be responsible for the processing of Personal Data to be included in the Insider List. Personal Data shall only be processed for the purposes set out below:

- (i) Compliance with legal or regulatory obligations, as set out in the MAR and any other related (future) legislation and regulation regarding market abuse, including providing information to supervisors as requested, such as, but not limited to:
  - (a) composing and maintaining a list of persons who may have Inside Information;
  - (b) taking internal disciplinary measures in case of non-compliance with the provisions of this policy;
  - (c) informing the AFM and any other authorities of any non-compliance with the provisions of this policy;
- (ii) Establishment, exercise or defence of legal claims.

### **Categories of Personal Data**

Ordina collects and processes Personal Data in the context of the realisation of the purposes described above. This information is set out in paragraph 6 of this policy and includes in any case the information included in Template 1 and Template 2 of Annex I of the Insider List Implementing Regulation.

### **Legal ground for processing**

The grounds of lawfulness invoked by Ordina for the processing of Personal Data of Ordina Employees are the following:

- (i) compliance with legal obligations Ordina is subject to;
- (ii) the legitimate interests pursued by Ordina, except where such interests are overridden by the interests or fundamental rights and freedoms of the Ordina Employees, such as, as the case may be, protecting the interests of the company, preventing illegal conduct, etc..

### **Recipients of Personal Data**

Ordina observes a strict duty of confidentiality with regard to Personal Data. Ordina does not share,

sell, rent, lend or disclose any of the Personal Data with any third party, except as described in this Appendix IV and unless Ordina provides Personal Data to:

- (i) a supervisory authority or court upon request or court order to the extent (i) it is necessary to comply with applicable law; or (ii) it is in the interest of Ordina; or
- (ii) such other party in so far as necessary in the execution of (i) Ordina's obligations under applicable law; or (ii) Ordina's legitimate interest, such as disclosure of Personal Data to its advisors; or
- (iii) the new or surviving entity, in the case that some of Ordina businesses may be restructured, bought or sold.

If Personal Data are transferred to a recipient third party in a country that does not provide an adequate level of protection for personal data, Ordina will take measures to ensure that Personal Data are adequately protected, such as entering into EU Standard Contractual Clauses with these third parties.

### **Technical and organisational measures**

Ordina takes reasonable efforts to ensure that appropriate technical and organisational security measures are being taken with regard to Personal Data.

Personal Data that is collected by Ordina in the context of the purposes set out in this Appendix IV shall be treated with due care. Within Ordina, the access rights to these Personal Data are restricted in such a way that they can only be accessed if this is necessary for the performance of certain tasks, so that only authorised persons who need Personal Data for the proper performance of their duties have the possibility to carry out internal consultations.

### **Removal of Personal Data from Insider List**

The Insider List shall be kept by the Compliance Officer. Personal Data collected pursuant to this policy and the MAR will be kept for a period of at least five years after the date of recording in the Insider List or alteration of the data or for such other period as required by applicable law. If the processing of Personal Data collected pursuant to this policy and the MAR is necessary for the resolution of a dispute or potential dispute or relates to the rights and obligations of Ordina, the Compliance Officer shall remove the Personal Data after resolution of the dispute or potential dispute and as soon as required by applicable law.

### **Rights with respect to Personal Data**

Under the GDPR, Employees may exercise a number of rights with regard to the processing of their Personal Data.

The Employee has the right to object at any time to processing of Personal Data based on the legitimate interest of Ordina on grounds relating to his or her particular situation. If an objection is raised by the Employee, Ordina shall no longer process such Personal Data if necessary to comply with applicable laws.

Employees have certain rights to access their Personal Data. Moreover, under certain circumstances, Employees have the right to rectify, erase, or restrict the processing of Personal Data, and – where applicable – Employees have the right to data portability.

Employees may address comments, objections or questions to the Data Protection Officer. Ordina shall respond to such requests within a period of one month. If Employees feel that their rights have been infringed, please inform the Data Protection Officer. In addition, Employees may always contact the appropriate local data protection authority.

## **APPENDIX V – CONDITIONS FOR TRADING BY BOARD MEMBERS AND INSIDERS DURING CLOSED PERIODS**

Under the following circumstances Trading by Board members and Insiders can be allowed during Closed Periods:

- (i) on a case-by-case basis due to the existence of exceptional circumstances, such as severe financial difficulty, which require the immediate sale of Ordina Securities; or
- (ii) due to the characteristics of the Trading involved for transactions made under, or related to, an employee share or saving scheme, qualification or entitlement of shares, or transactions where the beneficial interest in the relevant security does not change,

provided that in each case, the Board member or Insider can demonstrate that the particular transaction cannot be executed at any other moment in time than during the Closed Period.

With respect to (i) above, prior to any Trading during a Closed Period, a Board member or Insider shall provide a reasoned written request to the Compliance Officer for obtaining permission to proceed with immediate sale of Ordina Securities. The written request shall describe the contemplated Trade and provide an explanation of why the sale of shares is the only reasonable alternative to obtain the necessary financing. When examining whether the circumstances described in the written request referred to above are exceptional, the Compliance Officer shall take into account the indicators set out in the MAR.

With respect to (ii) above, Trading by Board members and Insiders is allowed during a Closed Period under the following circumstances:

- (a) The awarding of Ordina Securities in connection with an employee participation plan, provided that the conditions of the MAR are met. These requirements, in short, set out that the Board member or Insider does not have any discretion or influence as to the acceptance of the financial instruments awarded or granted and a pre-planned and organised approach is followed regarding the conditions, the periodicity, the timing of the award, the group of entitled persons and the amount of the financial instruments.
- (b) Exercising options or warrants or conversion of convertible bonds assigned to him under an employee scheme when the expiration date of such options, warrants or convertible bonds fall within a Closed Period, as well as sales of the shares acquired pursuant to such exercise or conversion, provided that (i) the Board member or Insider notifies Ordina of its choice to exercise or convert at least four months before the expiration date; (ii) the decision of the Board member or Insider is irrevocable; and (iii) the Board member or Insider has received authorisation from Ordina before proceeding.
- (c) Acquiring Ordina Securities under an employee saving scheme, provided that (i) the Board member or Insider has entered into the scheme before the Closed Period, except when it cannot enter into the scheme at another time due to the date of commencement of employment; (ii) the Board member or Insider does not alter the conditions of his participation into the scheme or cancel his participation into the scheme during the Closed Period; and (iii) the purchase operations are clearly organised under the scheme terms and that the Board member or Insider has no right or legal possibility to alter them during the Closed Period, or are planned under the scheme to intervene at a fixed date which falls in the Closed Period.

- (d) Any transfer, directly or indirectly, of Ordina Securities provided that the Ordina Securities are transferred between two accounts of the Board member or Insider and that such transfer does not result in a change in price of such Ordina Securities.
- (e) Any acquisition of Ordina Securities by a Board member or Insider upon accepting a management or supervisory function at Ordina where the final date for such acquisition falls during a Closed Period, provided that the Board member or Insider submits evidence to Ordina of the reasons for the acquisition not taking place at another time, and Ordina is satisfied with the provided explanation.

With respect to (i) above, the Board member or Insider will only proceed with Trading in a Closed Period after receiving written permission from the Compliance Officer.



## APPENDIX VI – REPORTING OBLIGATIONS

### Reporting obligations for Board members and Affiliated Persons:

- (A) Board members and Affiliated Persons must, no later than one business day following the transaction date, report to the Compliance Officer any Trade conducted or effected by them or on their behalf.
- (B) Board members and Affiliated Persons must notify the AFM of all Trades conducted or effected by them or on their behalf, for their own account, within three business days after the date of such Trade.

Such notification may be delayed until the moment when the Trades conducted for their own account amount to at least €5,000 in total (without netting) in any calendar year.

- (C) Board members and Affiliated Persons will at all times remain ultimately responsible for the compliance with their notification duties within the applicable timeframe.

### Notification forms:

All notifications pursuant to this policy should be made by using forms which are consistent with the forms adopted by the European Commission, ESMA or the AFM, as applicable, pursuant to the MAR. The Compliance Officer will make the forms available via Connect.