2026 FAQs for STAK Crowd - Ledgy and AML questionnaire

What is this about?

Fairphone is updating the way we manage STAK Crowdfunders records to make accessing your information easier. We are moving to Ledgy, a digital platform that brings your Depositary Receipt details and important documents together in one secure, central place. As part of this transition, we are asking you to complete a quick identity verification; this helps us ensure our records remain accurate and up-to-date for everyone.

Disclaimer: *This FAQ provides general information regarding the onboarding process for Ledgy and identity verification via RegLab. Further specific details regarding ongoing corporate transactions and participation process can be found in the Investor Relations page and separate direct communications sent to Depositary Receipt holders.*

Frequently Asked Questions

Why is STAK Crowdfunders introducing Ledgy?

Further to our communication on Tuesday, 11th of August 2026, Stichting Administratiekantoor Crowdfunders FairPhone ("STAK Crowdfunders") is introducing Ledgy, a digital equity-management platform for the administration of Depositary Receipts in FairPhone B.V. Ledgy will provide Depositary Receipt holders with a central place to access information relating to their holdings, relevant documents and important communications. The introduction of Ledgy is an administrative change only. It does not change the number of Depositary Receipts you hold or the rights and conditions applicable to them. Before access to Ledgy can be activated, Depositary Receipt holders are asked to complete a brief identity and due-diligence verification through **RegLab**, our designated verification provider.

How have my Depositary Receipts changed over time?

This is one of the reasons it is important for the STAK register to be accurate and up to date. The STAK Crowdfunders structure was established in 2018 following Fairphone's crowdfunding round through One Planet Crowd (OPC) platform, allowing participating crowdfunders to convert their investment into equity held through Depositary Receipts (DRs). Since then, the STAK's holdings have changed through a number of transactions, including additional share issuances, the 2023 Project George restructuring and trading opportunity, and the 2024 ratchet allocation. . As a result, your current DR holding may differ from your original crowdfunding investment and may be subject to future changes.

Why am I being asked to complete an identity verification?

The fact that you are being asked to complete this verification does not mean that there is any concern regarding you or your investment. As part of a standard due-dilligence procedure, STAK Crowdfunders needs to ensure that its register accurately reflects who holds its Depositary Receipts and that the information relating to those holders is complete and up to date. The verification also forms part of our broader due-diligence and compliance process, including checks relating to Anti-Money Laundering (AML), identity verification and applicable sanctions requirements. This process was previously handled by OPC. This process is being carried out for Depositary Receipt holders as part of updating and maintaining the STAK Crowdfunders administration.

What is Ledgy?

Ledgy is a digital equity-management platform that STAK Crowdfunders will use to administer your Depositary Receipts. It provides a central platform for maintaining ownership records, sharing relevant documents and communicating with Depositary Receipt holders. The introduction of Ledgy is an administrative change only. It does not change the number of Depositary Receipts you hold or the rights and conditions applicable to them. The introduction of Ledgy will help STAK Crowdfunders to:

- Maintain an accurate and up-to-date register of Depositary Receipt holders;
- Provide holders with a clearer overview of their Depositary Receipts;
- Manage relevant information and documents in a more structured manner; and
- Communicate with Depositary Receipt holders more efficiently.

What is RegLab?

RegLab is the due-diligence provider appointed by STAK Crowdfunders to support the verification process. You will receive a personal verification link through RegLab. The platform allows you to submit the required information and documentation securely. RegLab's system can also support identity, sanctions and other compliance checks. RegLab states that its application checks relevant UN, EU and national sanctions lists.

Is the RegLab verification link safe?

The short answer is yes. Information transmitted through RegLab, including logins, API calls and authenticated sessions, is encrypted in transit using TLS 1.2 or TLS 1.3, with RSA 2,048-bit keys or stronger. Data stored on RegLab's SaaS servers is encrypted at rest using AES-256 encryption, including backups and temporary files. Additional field- and row-level encryption is applied to personally identifiable information contained in backups. RegLab's product infrastructure is hosted exclusively within the European Union and operates in accordance with the ISO 27001 information-security standard, with annual audits by a certified auditor. Audit trails and system logs are also maintained to record changes to sensitive information. Personal data submitted as part of the due-diligence process is processed in accordance with applicable data-protection requirements, including the General Data Protection Regulation (GDPR).

What information will I be asked to provide?

The information requested will depend on whether you hold your Depositary Receipts personally or through a legal entity. For individuals, this may include:

- Full name
- Date and place of birth
- Residential address and country of residence
- Contact details
- Bank account details
- A valid passport or identity card

For legal entities, this may include:

- Statutory name and registered address
- A recent commercial register extract
- Details of authorised representatives
- Identification documents for authorised representatives

- Information regarding Ultimate Beneficial Owners (UBOs)
- A UBO register extract, where applicable
- A power of attorney, where applicable
- Bank account details

Depending on the information provided, additional supporting documentation may be requested where necessary to complete the verification.

Why do you need a copy of my identification document?

The identification document allows us to verify that the person completing the process is the person recorded as the Depositary Receipt holder, identity verification is a standard component of customer due diligence. We also have an obligation to perform these checks periodically and to keep the information we hold accurate and up to date.

Why do you need my bank account information?

Bank account information helps STAK Crowdfunders verify and maintain accurate information relating to its Depositary Receipt holders and provides an additional reference point when administering holder records and future transactions. Providing your bank details as part of this process does not authorise STAK Crowdfunders, RegLab or Ledgy to withdraw money from your account.

How is my information protected?

Your information is submitted through RegLab for the identification and due-diligence process for STAK Crowdfunders, with access protected through appropriate security controls including individually assigned accounts, two-factor authentication and restricted access to audit logs. Within Fairphone and STAK Crowd access is limited to those who need the information for verification, compliance and administration purposes.

Who will have access to my information?

Your information is submitted securely through RegLab for the identification and due-diligence purposes. Access is strictly limited to authorized personnel who need it for verification, compliance, and administrative tasks:

- **Fairphone & STAK Crowdfunders Teams:** Only internal staff involved in managing compliance and investor registers.

- **RegLab System Security:** Protected by individual user accounts, two-factor authentication, and restricted system logs.

No unauthorized third parties will have access to your data.

Will my information be used for marketing?

No. The information and documents collected through this process are used for identification, due-diligence, compliance and STAK administration purposes and are not used for marketing purposes.

Is Ledgy also secure?

Yes, Ledgy applies technical and organisational security measures including encryption and access controls, acts as a data processor under its Data Processing Addendum, is ISO 27001 certified and has completed SOC 1 Type 2 and SOC 2 Type 2 audits, with its data-processing framework designed to comply with applicable laws including the EU GDPR, UK GDPR and Swiss FADP.

For clarity, please note the following:

- RegLab is used for identity verification and due diligence
- Ledgy is used for ongoing administration of your Depositary Receipts and access to your holding information

What happens after I complete the verification?

Once the verification process has been successfully completed, STAK Crowdfunders can proceed with the activation of your Ledgy access. You will then receive a separate invitation from Ledgy, sent on behalf of STAK Crowdfunders allowing you to activate your account.

Does completing the verification change my Depositary Receipts?

No. The verification process and introduction of Ledgy are administrative measures. They do not change the number of Depositary Receipts you hold or the rights and conditions attached to those Depositary Receipts.

Is Ledgy a platform where I can sell my Depositary Receipts?

No. Ledgy is being introduced to administer the Depositary Receipts and provide holders with access to relevant ownership information and documentation. It is not a public marketplace or stock exchange for buying or selling Depositary Receipts. As usual, you may sell your Depositary Receipts in accordance with the applicable Trust Conditions, which are attached for reference. In short, a transfer can be documented through a private deed between the seller and purchaser, subject to the applicable conditions. Fairphone does not intermediate between potential buyers and sellers. If you have sold your DRs, please send a copy of the signed sale/purchase deed to crowdfunders@fairphone.com so that the transfer can be recorded in the Depositary Receipt register. You may also request a copy of the applicable Trust Conditions or other relevant STAK documentation at any time by contacting crowdfunders@fairphone.com. This information is provided for informational purposes only and is not a substitute for independent legal advice.
More information will be placed on Ledgy so please ensure you complete the necessary steps to gain access.

Why is this being done now if I have held my investment for several years?

Your investment originated from Fairphone's 2018 crowdfunding campaign, after which the shares were administered through STAK Crowdfunders. As part of a transition to more efficient management, Ledgy is becoming the central platform for managing Depositary Receipt information, making this an opportunity to ensure holder information is accurate and up to date.

What happens if I do not complete the verification?

Your Ledgy account cannot be activated until the required verification has been completed. We therefore encourage all Depositary Receipt holders to complete the process as soon as possible after receiving their personal verification link.

How long is my verification link valid?

Your personal RegLab verification link is valid for **7 days**. If the link expires, this does not mean that you have lost your Depositary Receipts. Please contact **crowdfunders@fairphone.com** and we can arrange for a replacement link to be issued.

I am on holiday or cannot complete the process within seven days. What should I do?

Please contact us at **crowdfunders@fairphone.com**. If your verification link expires before you are able to complete the process, a replacement link can be requested.

I have not received my verification email. What should I do?

Please first check your spam or junk folder. The verification request is being sent to the email address currently registered for you with STAK Crowdfunders. If:

- You have changed your email address
- You have not received the verification request
- Your link has expired or
- You experience technical difficulties

Please contact **crowdfunders@fairphone.com**.

How can I check whether an email is genuine?

STAK Crowdfunders will never ask you to make a payment merely to complete the identity verification process. If you receive an unexpected communication, are unsure about a link, or believe that an email may be fraudulent, do not submit your information. Instead, contact us directly at **crowdfunders@fairphone.com**. We can confirm whether the communication you received is genuine.

What does AML mean?

AML stands for Anti-Money Laundering. AML rules and procedures are designed to prevent money laundering, terrorist financing and other misuse of financial systems. AML measures are intended to help prevent the financial system from being used to disguise the proceeds of crime or finance terrorism. Under the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (**Wwft**), institutions that fall within the scope of the legislation are required to carry out customer due diligence, including identifying customers and verifying their identity.[1] A key part of AML due diligence is knowing who an individual or organisation is. This is commonly referred to as Know Your Customer (KYC) or customer due

[1] *Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (Wwft)*

diligence. Depending on the circumstances, this can include confirming a person's identity, identifying the ultimate beneficial owners of a company and conducting relevant sanctions checks.[2]

[2] *Q&As en Good Practices Wwft | De Nederlandsche Bank*