

DEXELANCE

PROCEDURE FOR THE MANAGEMENT AND COMMUNICATION OF INSIDE INFORMATION

Approved by the Board of Directors of Dexelance S.p.A.
(formerly Italian Design Brands S.p.A.) on 27 October 2022

Amended as per resolution of the Board of Directors of Dexelance S.p.A. on 13 May 2024

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1 INTRODUCTION

- 1.1 This procedure (the **Procedure**) is intended to regulate the management and processing of Inside Information (as defined below) concerning Dexelance S.p.A. (formerly Italian Design Brands S.p.A.) (the **Company** or **Dexelance** or **the Issuer**) by virtue of the listing of the shares of the Company on Euronext Milan, organised and managed by Borsa Italiana S.p.A.
- 1.2 The Procedure was adopted in accordance with the provisions of:
- Article 114 of Italian Legislative Decree no. 58 of 24 February 1998 (the **Consolidated Law on Finance** or **TUF** [Testo Unico della Finanza]);
 - Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014 (the **Market Abuse Regulation**);
 - Commission Implementing Regulation (EU) 2022/1210 of 13 July 2022 (**Implementing Regulation (EU) 2022/1210**);
 - Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016 (**Implementing Regulation (EU) 2016/1055**);
 - *Market Abuse Regulation (MAR) Guidelines - Delay in the disclosure of Inside Information*, published by ESMA (the European Securities and Markets Authority) and implemented by CONSOB (*Commissione Nazionale per le Società e la Borsa* — Italian Companies and Exchange Commission), which also provides them on its institutional website;
 - Guidelines no. 1/2017 on “Managing Inside Information” adopted by CONSOB on 13 October 2017 (the **Guidelines**).
- 1.3 The Company recognises the implicit value of the principles of market efficiency and transparency.
- 1.4 The Company communicates with the market in accordance with the criteria of fairness, clarity and equal access to information.
- 1.5 For anything not expressly provided for in this procedure, reference is made to the provisions on the dissemination of price sensitive information provided for in applicable legal and regulatory provisions.
- 1.6 The Procedure is a reference standard for all the Subsidiaries (as defined below), which are required to transpose the contents of the Procedure and ensure that they are adequately disseminated within the individual companies, in order to ensure, where appropriate, compliance with the Procedure and applicable laws and regulations.

2 DEFINITIONS

In addition to any terms defined in other articles of the Procedure, the following terms and definitions will have the meaning assigned to each of them hereinafter, it being specified that the terms defined in the singular are also understood as defined in the plural and vice versa.

- 2.1 **Chief Executive Officer:** the director or directors appointed by the Company's Board of Directors to perform the roles and responsibilities covered by this Procedure.
- 2.2 **Board of Statutory Auditors:** the Board of statutory Auditors of the Company in office on an individual basis.
- 2.3 **Board of Directors:** the Company's board of directors in office at a specific time.
- 2.4 **Subsidiaries:** companies controlled by the Company pursuant to Article 2359 of the Italian Civil Code and Article 93 of the TUF.
- 2.5 **List of Persons with Access to Inside Information or Insider List:** a list of persons with access to Inside Information established by the Company in accordance with Article 18 of the Market Abuse Regulation and the provisions of Implementing Regulation (EU) 2022/1210.
- 2.6 **Group:** the Company and its Subsidiaries
- 2.7 **Inside Information:** within the meaning of Article 7, paragraph 1, letter a) of the Market Abuse Regulation, information of a precise nature, which has not been made public, relating, directly or indirectly, to the Company or one of its Subsidiaries or to one or more of the Company's financial instruments, and which, if it were made public, could have a significant effect on the prices of those financial instruments or on the prices of related financial derivative instruments.

For the purposes of this definition:

– information is of a "precise nature" if it:

- (a) indicates a set of circumstances that exists or that may reasonably be expected to come into existence, or an event that has occurred or that may reasonably be expected to occur; and
- (b) is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event referred to in point (a) on the prices of financial instruments.

In this respect in the case of a protracted process that is intended to bring about, or that results in, circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information. An intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria of Inside Information as referred to in this Article;

– *"Information which, if made public, could have a significant effect on the prices of financial instruments"* means information a reasonable investor would be likely to use as part of the basis of their investment decisions.

- 2.8 **Relevant Information:** any information concerning events or circumstances that directly or indirectly concern the Company (and/or its subsidiaries) or the Financial Instruments issued by it and that, according to a reasonable assessment and on the basis of a preliminary and presumptive opinion, may subsequently become Inside Information.

- 2.9 **Disclosure Coordinator:** the Investor Relations department of the Company or the person responsible for implementing the provisions of this Procedure, appointed by the Board of Directors in accordance with this Procedure.
- 2.10 **Relevant Information Register:** the register of persons with access to Inside Information, established by the Company for a more effective monitoring of company information and in fulfilment of its obligations to disclose Inside Information to the market.
- 2.11 **Relevant Parties** refers to:
- (a) members of the Board of Directors and the Board of Statutory Auditors of the Company;
 - (b) persons who perform top management roles at the Company, but who are not members of the bodies referred to in point (a) above, have regular access to Inside Information and have the power to take management decisions that may affect the future development and outlook of the Company and/or Group;
 - (c) persons performing the roles referred to in points (a) and (b) above in a Subsidiary;
 - (d) persons with holdings in the Company's share capital;
 - (e) persons who have access to Inside Information in the course of their employment, profession or role;
 - (f) any other person holding Inside Information due to circumstances other than those referred to above, when that person knows or should know that it is Inside Information.

Where a Relevant Party is a legal person, this definition also applies to natural persons involved in the decision to purchase, dispose of, cancel or amend an order on behalf of that legal person.

- 2.12 **Financial Instruments:** "financial instruments" as referred to in Article 4, paragraph 1, point 15 of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014, issued by the Company and admitted to trading—or in respect of which admission to trading has been requested—on a regulated market.

3 PERSONS COVERED BY THE PROCEDURE

- 3.1 This Procedure is intended for Relevant Parties and contains provisions on the management and handling of Inside Information and of the Relevant Information, methods of disclosure of Inside Information to the public and provisions on the establishment and updating of the Insider Relevant Information Register

4 OBLIGATIONS AND PROHIBITIONS FOR PERSONS COVERED

- 4.1 Relevant Parties, in order to both protect the interests of the Company and the Group by keeping their affairs confidential and to avoid market abuse, are required to:
- (a) maintain strict confidentiality with regard to the Inside Information e Relevant Information of which they are aware;

- (b) handle Inside Information and Relevant Information with all necessary care to ensure that its circulation in the business context is without prejudice to the confidential nature of the information, until it is disclosed to the market in accordance with this Procedure and applicable rules;
- (c) promptly inform the relevant departments, in relation to information relevant to them — of any act, event or omission that may constitute a violation of the Procedure.

4.2 Relevant Parties are also prohibited from:

- (a) purchasing, selling or otherwise engaging in operations on Financial Instruments (including cancellations or amendments of orders when the order was placed before the person concerned came into possession of the Inside Information), directly or indirectly, on their own account or on behalf of third parties, using Inside Information;
- (b) recommending or providing inducements to others to engage in any of the operations under (a) on the basis of Inside Information;
- (c) disclosing Inside Information to third parties, outside the normal course of their employment, profession, role or office; in particular, Relevant Parties are prohibited from giving press interviews or making statements in general that contain Inside Information relating to the Company and its Subsidiaries that has not yet been disclosed to the market under this Procedure.

The disclosure to third parties of the recommendations or inducements referred to in point (b) is understood as unlawful disclosure of Inside Information if the person disclosing the recommendation or inducement knows or should know that these are based on Inside Information.

The same conduct indicated above shall also be observed by each Relevant Person with regard to any Relevant Information in his/her possession.

- 4.3 The Company discloses to the public, as soon as possible, Inside Information that directly concerns the Company and its Subsidiaries, in accordance with the procedures set out in Article 7.2 below.
- 4.4 The Company issues appropriate instructions to its Subsidiaries to ensure that they provide all necessary information in a timely manner in order to fulfil their market disclosure obligations.

5 DUTIES AND RESPONSIBILITIES

5.1 Board of Directors

The Board of Directors appoints, revokes and replaces the Disclosure Coordinator, defining the relative powers and duties—in accordance with this Procedure—and may also designate a substitute in the event of the absence or impediment of the Disclosure Coordinator.

5.2 Chief Executive Officer

- 5.2.1 The Chief Executive Officer:

- (a) is responsible for the procedures for managing Inside Information and Relevant Information, relations between the Company and institutional investors and relations with the press, making use of the competent internal structures;
- (b) gives instructions to the Disclosure Coordinator for the Procedure's proper application;
- (c) monitors the circulation of Inside Information and Relevant Information;
- (d) approves the communications submitted to the attention of the same by the Disclosure Coordinator.

5.2.2 Any relationship with the press and other media for the purpose of disclosure of Inside Information and Relevant Information must be expressly authorised by the Chief Executive Officer or another person appointed by the Chief Executive Officer.

5.3 Disclosure Coordinator

5.3.1 The Disclosure Coordinator:

- (a) assists, with the support of the Company's internal structures, the Chief Executive Officer in the proper fulfilment of the disclosure requirements for Inside Information and Relevant Information set out in this Procedure and in applicable regulations;
- (b) maps the types of Relevant Information and defines the criteria for their identification;
- (c) ensures the proper management of the Relevant Information Registry (if this task is not assigned to another person by the Board of Directors);
- (d) monitors the circulation of specific Relevant Information;
- (e) with the help of the internal structures of the Company, is responsible for relations with the media and the drafting of communications on Inside Information.

5.4 Subsidiaries

5.4.1 The Subsidiaries, and in particular the persons responsible by virtue of the entity's internal organisation, are required to promptly inform the Chief Executive Officer and the Disclosure Coordinator of any occurrence of a set of circumstances or of an event that constitutes or may constitute Inside Information or Relevant Information. The decision as to whether information is Inside Information is in any case left to the Chief Executive Officer or, at the latter's request, to the Board of Directors in accordance with Article 7.1.3 below.

6 INFORMATION THAT RELATES DIRECTLY OR INDIRECTLY TO THE ISSUER

- 6.1.1 The Company discloses to the public, as soon as possible and according to the methods set out in the following Article 7.2, any Inside Information that relates directly to the Company.
- 6.1.2 As stated in the Guidelines, information that "indirectly" concerns the Company, such as information that, while affecting the prices of Financial Instruments issued by the Company, originates from outside

the Company, should therefore not be disclosed by the Company (see paragraph 4.2.1 of the Guidelines).

- 6.1.3 The Guidelines provide (i) an exemplary and non-exhaustive list of types of Inside Information that could directly affect an issuer and (ii) examples of information that indirectly concerns an issuer; both lists are reproduced in Annex A to this Procedure (please see the annex for further details).
- 6.1.4 The Guidelines also clarify that, following the publication of information indirectly concerning the issuer, it is possible that Confidential Information (as defined in paragraph 10.1 below) that had not been considered Inside Information by the issuer may, conversely, come to be Inside Information; the Guidelines also provide some examples, which are reproduced in Annex A to this Procedure (please see the annex for further details).

7 HANDLING OF INSIDE INFORMATION

7.1 Assessing whether information is Inside Information

- 7.1.1 Persons in charge of the offices of the Company and the Subsidiaries who consider that the Company is required to disclose to the market any Inside Information that has come to their knowledge as a result of their employment or profession or the duties they perform, concerning events occurring in the sphere of activity of the Company and/or its Subsidiaries and in respect of which the public disclosure obligations have not yet been fulfilled, immediately inform the Disclosure Coordinator of this circumstance.
- 7.1.2 If the Disclosure Coordinator 7.1.1, including as a result of the reports received pursuant to the above paragraph, considers that the same has Inside Information, the Disclosure Coordinator shall inform the Chief Executive Officer without delay.
- 7.1.3 The Chief Executive Officer, or—at the latter's request—the Board of Directors:
 - (a) assesses, with the support of the Disclosure Coordinator and the Company's internal structures, whether the information can effectively be categorised as Inside Information;
 - (b) determines whether to proceed with a communication to the market, or whether to delay such communication, in accordance with the provisions of applicable legislation and with the support of the Disclosure Coordinator.
- 7.1.4 When the existence of Inside Information is identified, the Chief Executive Officer shall inform the Disclosure Coordinator or the other party responsible for maintaining the Insider List, so that he/she may fulfil the obligations provided for in Article 9, and formalise this decision and record the following on an IT instrument:
 - (a) the date and time at which the information became Inside Information
 - (b) the date and time at which the Company decided on this matter;
 - (c) the identity of the persons who made the decision or participated in making the decision.

7.2 Disclosure of Inside Information to the public

- 7.2.1 The Company – if no recourse is made to the delay under Article 8 of this Procedure or, if recourse to this delay was previously made, the conditions permitting such recourse have ceased to exist:
- (a) through the Disclosure Coordinator, discloses the Inside Information to the public as soon as possible;
 - (b) ensures that the Inside Information is made public in a manner that allows for rapid access and full, fair and timely public assessment;
 - (c) publishes and keeps on its website all Inside Information disclosed to the public for a period of at least five years.
- 7.2.2 The Company must not combine the disclosure of Inside Information to the public with the marketing of its activities.
- 7.2.3 The disclosure of Inside Information to the public must take place as soon as possible through the dissemination of a specific press release prepared by the Company, as provided below, taking into account the press release formats contained in the Instructions to the Regulations of the Markets Organised and Managed by Borsa Italiana S.p.A., as applicable.
- 7.2.4 The Investor Relations department prepares the draft press release and shares it, where appropriate, with the corporate departments concerned as appropriate, in order to allow them, in their respective areas of competence, to evaluate its merit and contents and whether the criteria for the preparation of the press release are met.
- 7.2.5 The text of the draft press release must be submitted and approved by the Chief Executive Officer and, if deemed appropriate or necessary, by the Board of Directors, for final approval before its external dissemination, subject to certification, if the text relates to accounting information, by the manager responsible for the preparation of the Company's financial statements (the **Chief Reporting Officer**), pursuant to and for the purposes of Article 154-*bis* of the TUF.
- 7.2.6 As specified in the Guidelines (see paragraph 7.1 of the Guidelines):
- (a) disclosure takes place within the time period necessary for the press release to be drawn up in order to allow for a full and fair assessment of the Inside Information by the public and for its subsequent transmission to the SDIR (*Sistema di Diffusione delle Informazioni Regolamentate* — Regulated Information Disclosure System) circuit used by the Company for the transmission of the Regulated Information (the **SDIR**)¹;
 - (b) in order to enable CONSOB and the market management company to carry out their supervisory activities in a timely manner, the Company advises CONSOB in advance, including informally and in good time, of the possibility of particularly important Inside Information being disclosed to the

¹ If the information becomes Inside Information on a Friday after the markets close, the issuer does not take into account the fact that the markets will be closed over the weekend in order to ensure the correct timing of publication. This is also in view of the possibility of concluding OTC operations (see paragraph 7.1.6 of the Guidelines).

public while the Financial Instruments are being traded. Similar notice is given to the market management company in accordance with market rules.

- 7.2.7 The Investor Relations Department enters the press release into the SDIR circuit, through which it is transmitted to CONSOB, Borsa Italiana S.p.A. and the press agencies connected to the system².
- 7.2.8 In the event that the Inside Information has been accessed by a third party that is not bound by an obligation of confidentiality (regardless of whether that obligation is legal, regulatory, statutory or contractual in nature), intentional or unintentional disclosure by the Company or by persons acting in its name or on its behalf in the ordinary course of their professional activity or role or, in any event, the confidentiality of the Inside Information has effectively ceased to exist, the Company is required to re-establish disclosure parity by disseminating the Inside Information to the public. Such disclosure must take place (i) simultaneously, if the disclosure was intentional, and (ii) in a timely manner, if the disclosure was unintentional.
- 7.2.9 The press release is deemed to be public as soon as confirmation has been received from the SDIR system. In cases of operational malfunction and/or interruption to the SDIR system service, the disclosure obligations to Borsa Italiana S.p.A. are fulfilled by fax sent to the numbers indicated in the Instructions to the Regulations of the Markets Organised and Managed by Borsa Italiana S.p.A.³
- 7.2.10 The press release is also sent to the authorised storage mechanism used by the Company to keep Regulated Information.
- 7.2.11 The Investor Relations department uploads the press release to the Company's website, ensuring (i) that non-discriminatory and free access is provided; (ii) the Inside Information is published in an easily identifiable manner in the "Investors" section of the website; and (iii) that the date and time of publication of the Inside Information and the chronological order of the Inside Information are shown; all in accordance with the principles set out in Article 11 below, where applicable.
- 7.2.12 In the event of a loss of confidentiality, the Inside Information should be disclosed to the public as soon as possible.
- 7.2.13 The 7.2.12 above provisions also apply in the case of rumours that are sufficiently accurate to indicate that the confidentiality of the Inside Information is no longer guaranteed.

² Pursuant to Article 2, paragraph 1, letter b) of Implementing Regulation (EU) 2016/1055 "Issuers (...) shall disclose inside information using technical means that ensure: (...) (b) inside information is communicated, directly or through a third party, to the media which are reasonably relied upon by the public to ensure its effective dissemination. That communication shall be transmitted using an electronic means able to ensure the completeness, integrity and confidentiality of the information during transmission, and it shall clearly identify: (i) that the information communicated is inside information; (ii) the identity of the issuer or emissions allowance market participant; full legal name; (iii) the identity of the person making the notification: name, surname, position within the issuer or emission allowance market participant; (iv) the subject matter of the inside information; (v) the date and time of the communication to the media."

³ Instructions to the Regulations of the Markets Organised and Managed by Borsa Italiana S.p.A. provide that, in such cases, the press release must be sent to one of the following fax numbers: +39 02/8646.4242; +39 02/7200.4666.

7.2.14 Public disclosure of Inside Information relating to other companies in the Group is in any event the responsibility of the Company. The Subsidiaries must therefore refrain from independently disclosing Inside Information to the public.

7.3 Dissemination of information at Shareholders' Meetings and meetings with the press, financial analysts or trade union representatives

7.3.1 The disclosure of Inside Information at a Shareholders' Meeting of the Company entails an obligation to disclose this information to the public using the methods set out in paragraph 7.2.

7.3.2 In the event that the Company or other Group companies organise or participate in meetings where financial analysts, institutional investors or other market participants are present, the Investor Relations department of the Company:

- (a) informs CONSOB and the market management company in advance of the date, place and main topics of the meeting;
- (b) transmits to CONSOB and the market management company, through the SDIR system or in any alternative way established by the competent authority, the documentation provided to the meeting participants, no later than the time when the meetings are taking place;
- (c) opens the meeting to representatives of the financial press, or, if this is not possible, publishes, in the manner provided for in paragraph 7.2, a press release explaining the main topics covered (see paragraph 7.9.1 of the Guidelines).

7.3.3 It is understood that, during such meetings, the Company does not disclose Inside Information to participants unless it is disclosed to the public in the manner provided for in paragraph 7.2, simultaneously in the case of intentional disclosure and in a timely manner in the case of unintentional disclosure (see paragraphs 7.9.1 and 6.5.5. of the Guidelines).

7.3.4 In the event that the Company participates in meetings with representatives of trade unions in the course of which data on business outlook are examined, where the delegations of the organisations have not assumed any obligation of confidentiality, the Company discloses to the public any Inside Information described therein (see paragraph 6.5.8 of the Guidelines).

8 DELAY OF DISCLOSURE

8.1 Conditions for Delay

8.1.1 Within the meaning of Article 17, paragraph 4, of the Market Abuse Regulation, the Company may, under its own responsibility, delay the public disclosure of Inside Information (including in the event of a lengthy process that is taking place in phases and is aimed at realising or that entails a particular circumstance or particular event), provided that the following conditions (the "**Conditions for Delay**") are met:

- (a) immediate disclosure would probably undermine the legitimate interests of the Company;
- (b) the delay in disclosure is not likely to mislead the public;

- (c) the Company is able to ensure the confidentiality of the Inside Information in question.

In the case of a lengthy process that is taking place in phases and is aimed at realising or that entails a particular circumstance or particular event, the Company may, under its own responsibility, delay the public disclosure of Inside Information relating to that process, without prejudice to the need for the existence and maintenance of the Conditions for Delay, as set out below.

8.2 Procedure for triggering a Delay in the public disclosure of Inside Information

- 8.2.1 The assessment of the possibility of delaying the public disclosure of Inside Information is carried out on a case-by-case basis under the direct responsibility of the Chief Executive Officer or the Board of Directors, as the case may be, in accordance with Article 7.1.3 above.
- 8.2.2 For this purpose, the Chief Executive Officer or the Board of Directors, as the case may be, verifies the existence of the Conditions for Delay, taking into account, in any case, the provisions contained in ESMA's Guidelines on delay, and fills in the appropriate form, also using the Disclosure Coordinator for this purpose, prepared in accordance with the template in [Annex B](#) to this Procedure.
- 8.2.3 After verifying that the Conditions for Delay have been met, the CEO files this form at the office of the same, together with any additional documents on the basis of which the assessment was made and stating the reasons for the delay, taking appropriate measures to ensure that such documents cannot be accessed by persons other than those at the Company who are required to have access to them in the normal course of their professional activities or role. Those documents must contain all the elements required by Implementing Regulation (EU) 2016/1055 for the testing and notification of the delay, as specified below.
- 8.2.4 For the delay in the disclosure of Inside Information to the public, the Company uses methods that ensure the accessibility, legibility and durable storage of the information referred to in Article 4, paragraph 1, of Implementing Regulation (EU) 2016/1055, as shown below:
- (a) the date and time:
- i. when the Inside Information first existed at the Company;
 - ii. when the decision to delay the disclosure of the Inside Information was taken;
 - iii. when the Inside Information will probably be disclosed by the Company;
- (b) the identity of the persons at the Company who are responsible for:
- i. taking the decision to delay disclosure and the decision determining the start of the period of the delay and its probable end;
 - ii. continuous monitoring of the Conditions for Delay;
 - iii. taking the decision to disclose the Inside Information to the public;
 - iv. notifying CONSOB of the required information on the delay and the explanation in writing;

- (c) evidence of initial fulfilment of the Conditions for Delay and of any change in this respect that occurred during the period of delay, including:
 - i. protective barriers to information erected both internally and externally to prevent access to Inside Information by persons other than those within the Company who have to access it in the normal course of their professional activity or role;
 - ii. the procedures for disclosing Inside Information as soon as possible when confidentiality is no longer guaranteed.

8.2.5 The Chief Executive Officer—subject to compliance with the requirements set out in Article 4, paragraph 1 of Implementing Regulation (EU) 2016/1055 referred to above—takes any measures deemed appropriate by the same—in the specific case and taking into account the type of Inside Information and the electronic and/or paper format of the document in which it is contained—to ensure that delayed Inside Information is kept secret and its confidentiality is maintained (e.g. in the case of documents in electronic format, measures are in place to ensure limited access to the relevant document system), all this also taking into account the provisions of Article 11 of the Procedure.

8.2.6 The Company has a set of measures (barriers) in place to segregate Inside Information, i.e. to prevent persons (internal or external to the Company) who do not have access to Inside Information in the normal course of their professional activities or role, i.e. persons who do not need to know Inside Information (see paragraph 5.1.2. of the Guidelines).

8.3 Conduct of the Company during the delay

8.3.1 During the delay, the Chief Executive Officer monitors on a case-by-case basis and with the support of the person indicated in the documents filed pursuant to paragraph 8.2, the continued existence of the Conditions for Delay and, , the confidentiality and dissemination of the Inside Information whose disclosure has been delayed.

8.3.2 The Issuer prepares in advance a draft communication to the public to be disseminated in the event that the monitoring reveals that one of the Conditions for Delay has ceased to apply (see paragraph 6.7.2. of the Guidelines).

8.3.3 In the event that it is established that even one of the Conditions for Delay has ceased to apply, (i) the Inside Information must be disclosed to the public as soon as possible, in accordance with Article 2 of this Procedure, and (ii) immediately after being disclosed to the public, the Company makes the notification referred to in paragraph 8.4 below.

8.3.4 Confidentiality is also deemed to no longer exist if a rumour refers explicitly to Inside Information whose disclosure has been delayed, when this rumour is sufficiently accurate to indicate that the confidentiality of this information is no longer guaranteed (pursuant to Article 17, paragraph 7 of the Market Abuse Regulation).

8.3.5 Where the issuer has an ongoing buyback programme within the meaning of Article 5 of the Market Abuse Regulation (the **Buyback Programme**), following the decision to delay the publication of the Inside Information, the Chief Executive Officer informs the department responsible for the purchase of treasury shares that the conditions for operating under the exemption provided for in the Market Abuse

Regulation are no longer met (see Article 4, paragraph 1, letter c) of Delegated Regulation (EU) 2016/1052⁴), unless the conditions for continuing the Buyback Programme referred to in Article 4, paragraph 2 of the aforementioned Delegated Regulation are met. If the Company has suspended its ongoing Buyback Programme, the Chief Executive Officer notifies the department responsible for buying back treasury shares that the conditions have again been met so that it can resume operations under the exemption provided for in the Market Abuse Regulation (see paragraphs 6.6.2 and 6.8.4 of the Guidelines).

- 8.3.6 Similarly, if the Company has an ongoing programme to buy back its treasury shares that is not covered by the purposes set out in Article 5 of the Market Abuse Regulation, following the decision to delay publication of the Inside Information, it suspends the purchases to be made under that programme and resumes operations only after the Inside Information has been disclosed to the public (in this case, the above reporting requirements apply *mutatis mutandis*).
- 8.3.7 During the delay, the Company does not make public information that is not consistent with the delayed information (see paragraph 6.4.2 of the Guidelines).

8.4 Notification of delay

- 8.4.1 When disclosure of Inside Information has been delayed pursuant to this Article 8, the Chief Executive Officer (or the Board of Directors, as the case may be), immediately after the Inside Information has been disclosed to the public, notifies this delay to the competent authority and provides the information required by Implementing Regulation (EU) 2016/1055, in writing, by sending CONSOB the form set out in Annex B by certified email to consob@pec.consob.it⁵.
- 8.4.2 Pursuant to Article 4, paragraph 3 of Implementing Regulation (EU) 2016/1055, the notification of the delay to CONSOB must include the following information:
- (a) the identity of the Company: full company name;
 - (b) the identity of the notifier: first name, surname, position at the Company;
 - (c) the contact details of the notifier: work email address and telephone number;
 - (d) the identification of the Inside Information concerned by the delay in disclosure: (i) the title of the disclosure notice; (ii) the reference number, if assigned by the system used to disclose the Inside Information; and (iii) the date and time of the disclosure of the Inside Information to the public;
 - (e) the date and time of the decision to delay the disclosure of the Inside Information;
 - (f) the identity of all persons responsible for the decision to delay the disclosure of the Inside Information to the public.

⁴ The possibility of the Company continuing the Buyback Programme by taking the measures referred to in Article 4, paragraphs 2 and 4 of Delegated Regulation (EU) 2016/1052 remains unaffected.

⁵ The "Markets Division" should be specified as the addressee, with "MAR Disclosure Delay" at the start of the subject line.

- 8.4.3 In the event that, pursuant to Article 114, paragraph 3 of the TUF, in conjunction with Article 4, paragraph 4 of Implementing Regulation (EU) 2016/1055, the written explanation of how the Conditions for Delay have been met is to be provided to the competent authority upon subsequent request by the latter, the Company complies with the requests of the competent authority by providing it, in the manner set out in paragraph 8.4.1 above, with the form in Annex B, also including this information.
- 8.4.4 Notification to the competent authority is not required if, after the decision to delay publication, the information is not disclosed to the public because it is no longer Inside Information (see paragraph 6.8.2 of the Guidelines).

9 LIST OF PERSONS WITH ACCESS TO INSIDE INFORMATION

9.1 General rules

- 9.1.1 The Company establishes and maintains a list of individuals with access to Inside Information (the Insider List), which is kept in a way that ensures that the data it contains are easy to consult and extract.
- 9.1.2 The Insider List is established pursuant to and for the purposes of Article 18 of the Market Abuse Regulation and Implementing Regulation (EU) 2022/1210.

9.2 Insider List

- 9.2.1 The Disclosure Coordinator (or other person identified by the Board of Directors) (the **Insider List Manager**), using the Company's internal structures, shall immediately include on the Insider List anyone who, on a regular or occasional basis, has access to Inside Information and all persons with whom the Company or persons acting in its name or on its behalf have a working relationship (employment contract or otherwise) and who, in the performance of certain tasks, have access to Inside Information (such as advisors, accountants or credit rating agencies).

The Company may decide to use an external company to establish and maintain the Insider List. In particular, the Company may use an external entity for the management of all aspects related to the management of the Insider List, its maintenance and updating and communications relating to the subjects covered by the Procedure

- 9.2.2 The Insider List is divided into separate sections, one for each piece of Inside Information, and indicates the date on which it was drawn up. A new section must be added to the Insider List every time a new piece of Inside Information is identified.
- 9.2.3 Without prejudice to the above, the Company has added to the Insider List an additional section called the permanent access section - differing from the other sections since it was not created on the basis of the existence of a specific piece of Inside Information - which contains the details of persons who, due to their role or position, always have access to all Inside Information. Once entered in this section, these details do not need to be repeated in the other sections.
- 9.2.4 Each section of the Insider List must contain, as a minimum, information on the identity of the person registered and the reason for registration of the same, the date and time at which that person had access

to Inside Information, and the additional information set out in Template 1 and Template 2 of Annex I to Implementing Regulation (EU) 2022/1210, set out in Annex C to this Procedure.

- 9.2.5 The Insider List must be maintained in an electronic format that ensures:
- (a) the confidentiality of the information contained therein by ensuring that access to the Insider List is limited to clearly identified persons who, within the Company, or any other person acting in its name or on its behalf, are required to access it due to the nature of their respective role or position;
 - (b) the accuracy of the information on the Insider List;
 - (c) the ability to access and retrieve previous versions of the Insider List.
- 9.2.6 The Insider List must be updated in a timely manner when: (i) there is a change in the reason for inclusion of a person already on the Insider List; (ii) a new person must be registered on the Insider List because the same has access to Inside Information; (iii) a person on the Insider List no longer has access to Inside Information. Each update indicates the date and time at which the change necessitating the update occurred.
- 9.2.7 The Insider List Manager arranges for the Insider List to be compiled on the basis of information known to the same or received by email from the Chief Executive Officer or other corporate department managers involved as appropriate. The Insider List Manager may at any time consult the various departments/roles of the Company to verify the correctness of the data in possession of the same.
- 9.2.8 In particular, the Insider List Manager receives from these persons the data on the registration, updating and termination of registration of entries in the Insider List of persons with access to Inside Information.
- 9.2.9 Immediately after a person has been registered on the Insider List, the Insider List Manager informs the person in writing of: (i) their inclusion on the Insider List; (ii) the legal and regulatory obligations arising from access to Inside Information; and (iii) the sanctions applicable to insider dealing and unlawful disclosure of Inside Information.
- 9.2.10 The Insider List Manager also informs the persons on the Insider List of any updates concerning them and of their removal from the Insider List, by means of a corresponding written notice.
- 9.2.11 The data of persons on the Insider List must be kept for a period of at least five years after the circumstances giving rise to the registration or updating have ceased to exist.
- 9.2.12 The Company transmits⁶ the Insider List to the competent authority as soon as possible at the latter's request.
- 9.2.13 The aforementioned provisions apply with regard to Inside Information, even if the Company has decided not to make recourse to the delay and is making the public disclosure under Article 7.2.

9.3 Access to the Insider List

⁶ By certified email to consob@pec.consob.it (if the sender is required to have a certified email address) or by email to protocollo@consob.it. Further guidance will be provided in the CONSOB request letter.

- 9.3.1 Without prejudice to the powers of the competent authorities, access to the Insider List is reserved for:
- (a) the Disclosure Coordinator and any persons appointed to manage the Insider List;
 - (b) The Chief Executive Officer, in order to oversee the proper application of the Procedure, making use of the competent corporate structures where appropriate.

9.4 Confidentiality of the information on the Insider List

- 9.4.1 The personal data necessary for registration on the Insider List will be collected and processed in accordance with applicable personal data protection legislation.

10 LIST OF PERSONS WITH ACCESS TO RELEVANT INFORMATION

10.1 General rules

- 10.1.1 The Company has established a Relevant Information Register in order to monitor the circulation of Relevant Information, which is maintained and updated by the Disclosure Coordinator or by another person specifically identified for that role by the Board of Directors ("**Relevant Information Register Manager**").
- 10.1.2 The Relevant Information Register indicates for each specific piece of Relevant Information the persons who have access to it.
- 10.1.3 The Company may decide to use an external company for the establishment and maintenance of the Relevant Information Register, under its own responsibility. In particular, the Company may avail itself of an external party for all aspects regarding the management of the Relevant Information Register, its keeping and updating, as well as communications regarding the matters covered by the Procedure.
- 10.1.4 Each person in charge of the corporate office responsible for the activity performed with respect to the event/issue to which the Relevant Information relates is responsible for:
- (a) the identification of the Relevant Information;
 - (b) the identification of persons who are in possession of Relevant Information in relation to each open position.
 - (c) notification to the Relevant Information Register Manager of the above-mentioned information as well as updates on any subsequent developments.
- 10.1.5 The Relevant Information Register Manager shall have the Relevant Information Register filled in on the basis of the information received and/or of his knowledge. He/she may at any time contact the various departments/offices of the Company to verify the correctness of the data in his/her possession.
- 10.1.6 Immediately after the entry of a person in the Relevant Information Register, the Relevant Information Register Manager shall inform this same person in writing, reminding him/her of the confidentiality obligations prescribed under this Procedure. The Relevant Information Register Manager shall also inform the persons entered in the Relevant Information Register of any updates concerning this information and of its possible deletion, by means of a compliant written notice.

- 10.1.7 The Disclosure Coordinator shall promptly inform the Chief Executive Officer, in accordance with Article 7.1.2 above, if he/she believes that any Relevant Information communicated to him/her or of which he/she has otherwise become aware may have become Inside Information.
- 10.1.8 The personal data required for entry in the Relevant Information Register shall be acquired and processed in compliance with the applicable data protection legislation.

11 CONFIDENTIALITY OBLIGATIONS REGARDING INSIDE INFORMATION

11.1 Confidential Information

- 11.1.1 For the purposes of this Procedure, “*confidential information*” means any information and knowledge, not categorised as Inside Information, concerning the Company and/or a Group company, which is not in the public domain and which, by reason of its subject matter or other characteristics, is confidential (including every specific Relevant Information), acquired by the Relevant Parties in the performance of their duties and/or roles (the “**Confidential Information**”).

11.2 Confidentiality obligations

- 11.2.1 The Company restricts and controls access to Confidential Information by ensuring the organisational, physical and logical security of the information, including by structuring different levels of access, protecting the relevant information supports (keywords, encryption etc.) and imposing limits on the circulation of data and documents (see paragraph 3.4.1. of the Guidelines).
- 11.2.2 Relevant Parties in possession of Confidential Information are required to:
- (a) maintain the confidentiality of all documents and information acquired in the performance of their tasks;
 - (b) use such documents and information exclusively in the performance of their roles and responsibilities;
 - (c) ensure that the opening and distribution of mail received through the postal service is carried out in accordance with confidentiality criteria;
 - (d) strictly comply with this Procedure if the Confidential Information subsequently becomes Inside Information.
- 11.2.3 Each Relevant Person is personally responsible for the safekeeping of the Confidential Information documents provided to the same. Documents relating to Confidential Information must be kept by the Relevant Person, including in electronic format, in such a way that only authorised persons have access to them. When Relevant Persons are required to transmit documents or information relating to Confidential Information to third parties in the normal course of their professional activity or role, they must ensure that they are bound by an obligation of confidentiality with respect to the documents and information received, independent of whether that obligation is legislative, regulatory, statutory or contractual.

- 11.2.4 Any relationship of the Relevant Person with the press and other media with a view to disclosure of Confidential Information must take place exclusively through the Investor Relations department, which must obtain the prior authorisation of the Chief Executive Officer. In any event, when documents and information concerning Confidential Information contain references to data related to profits and losses, assets and liabilities and cash flows, investment, employment and similar data, such data will be subject to prior validation by the Chief Reporting Officer.
- 11.2.5 It is understood that (i) the requirements of Article 10.2 also apply with regard to Inside Information when this is required in the specific case to ensure the confidentiality of the information and (ii) the provisions of paragraph 7.2 of the Procedure are complied with for the public disclosure of Inside Information.

12 MARKET SURVEYS

- 12.1.1 If the Company decides to proceed, directly or through third parties, with a market survey pursuant to Article 11, paragraph 5 of the Market Abuse Regulation, i.e. the disclosure of information to one or more potential investors, prior to the announcement of an operation, in order to assess the interest of potential investors in a possible operation and the relevant conditions (potential size, price and structure of the operation etc.), persons carrying out the survey, before proceeding with the survey:
- (a) must assess whether the market survey will involve the disclosure of Inside Information;
 - (b) record their conclusion and the reasons for it in writing;
 - (c) obtain the consent of the persons receiving the market survey to receive Inside Information and inform them that (i) they are prohibited from using or attempting to use that information for the purpose of the acquisition or disposal, on their own account or on behalf of a third party, directly or indirectly, of the financial instruments to which the information relates, (ii) they are prohibited from using or attempting to use that information by deleting or amending an order already submitted in respect of a Financial Instrument to which the information relates, and (iii) by agreeing to receive information, they are obliged to keep that information confidential.
 - (d) provide such written records at the request of the competent authority;
 - (e) update the written records related to the survey;
 - (f) keep all information provided to the person receiving the market survey, including the identity of potential investors to which the information has been disclosed, including but not limited to legal persons and natural persons acting on behalf of the potential investor, and the date and time of each disclosure;
 - (g) retain the survey records for 5 (*five*) years.
- 12.1.2 If information that has been disclosed in the course of a market survey ceases to be Inside Information, on the basis of the assessment of the disclosing person, the latter informs the person that received the above information of this as soon as possible.

- 12.1.3 Disclosure of Inside Information by a person intending to make a takeover bid for a company's securities or carry out a merger with a company of persons entitled to the securities, also constitutes a market survey, provided that the information is necessary to enable the persons entitled to the securities to form an opinion on their willingness to offer their securities and the willingness of the persons entitled to the securities to offer their securities is reasonably necessary for the decision to make the takeover or merger bid.

13 VIOLATIONS OF THE PROHIBITION ON DISCLOSURE OF INSIDE INFORMATION

- 13.1 The abuse and unlawful disclosure of Inside Information, as well as market manipulation, constitute offences liable for administrative and criminal penalties against the persons who committed such offences, in accordance with laws and regulations applicable *pro tempore*, and may also give rise to situations involving the administrative liability of the Company pursuant to Italian Legislative Decree no. 231/2001.
- 13.2 Any violation of the obligations set out in this Procedure, even if the same does not result in conduct directly sanctioned by the competent judicial, administrative and/or supervisory authority, constitutes serious damage to the Company, including in terms of image, with major economic and financial consequences. The violation also implies the possibility for the Company to claim compensation from the perpetrator for the damage suffered by the Company and/or the Group.
- 13.3 In the event of a Director breaching their obligations under this Procedure, the Director concerned will not be able to participate in the resolution on the penalties. If a majority of the members of the Board of Directors participated in the violation, the Board of Statutory Auditors will be competent to take appropriate action.
- 13.4 If committed by other Relevant Parties (other than Directors), the breach of the obligations referred to in this Procedure may result in a disciplinary offence for those required to apply it and, in more serious cases, may result in dismissal, also exposing the person who committed the breach to the risk of criminal and administrative penalties.
- 13.5 If the Company is sanctioned for breaching the corporate disclosure provisions as a result of non-compliance with the principles set out in this Procedure, the Board of Directors will take action against those responsible for such breaches, in order to obtain reimbursement of the charges related to the payment of such penalties, without prejudice to any further claim for damage, including damage to image.

14 INFORMATION FLOWS TO THE SUPERVISORY BOARD PURSUANT TO DECREE 231

- 14.1 The corporate departments involved in the activities referred to in this Procedure are responsible for ensuring that the Company sends to the Supervisory Body pursuant to Italian Legislative Decree no. 231/2001 appropriate information flows in the manner set out in its specific business guidelines.
- 14.2 The Supervisory Body is authorised to carry out controls to ensure that this Procedure is actually being implemented, requesting the necessary documents from the departments involved.

15 AMENDMENTS AND ADDITIONS TO THE PROCEDURE

- 15.1 The provisions of this Procedure will be updated and/or supplemented by the Company's Board of Directors, taking into account any applicable legal or regulatory provisions, as well as experience gained from applying the provisions and market practice in this regard.
- 15.2 Where it is necessary to update and/or supplement individual provisions of the Procedure due to amendments to applicable law or regulations or specific requests from the supervisory authority, and in cases of proven urgency, this Procedure may be amended and/or supplemented by the Chief Executive Officer, with subsequent ratification of the amendments and/or additions by the Board of Directors.

Annex A

An exemplary, non-exhaustive list of the types of Inside Information that could directly affect an issuer and examples of information that indirectly affects an issuer.

A. An exemplary and non-exhaustive list of types of Inside Information that could directly affect an issuer.

Information relating to:

- ownership structure
- management composition
- management incentive plans
- auditor activity
- capital operations
- issuance of Financial Instruments
- characteristics of the Financial Instruments issued
- acquisitions, mergers, divisions etc.
- restructuring and reorganisation
- operations on Financial Instruments, buy-backs and accelerated book-building
- insolvency procedures
- legal litigation
- revocation of bank credit lines
- writedowns/writeups of assets or Financial Instruments held
- patents, licences, rights etc.
- insolvencies of major debtors
- destruction or damage to uninsured property
- purchase or sale of assets
- business performance
- changes in the expected financial results for the period (profit warnings and earnings surprises)
- receipt or cancellation of major orders
- entering new (or exiting) markets

- changes to investment plans
- dividend distribution policy

B. Exemplary and non-exhaustive list of types of information that indirectly concern the issuer.

Information relating to:

- data and statistics disseminated by public institutions
- upcoming ratings agency reports
- upcoming publication of research by financial analysts
- investment recommendations and recommendations on the value of Financial Instruments
- central bank decisions on interest rates
- government decisions on taxation, industry regulation, debt management etc.
- decisions of public authorities and local government
- decisions on changes to the rules on the definition of market indices and, in particular, their composition
- decisions on the micro-structure of trading facilities; for example, changes in the market segment in which the issuer's shares are traded or changes in trading modalities or a change in market makers or trading conditions
- decisions of supervisory or antitrust authorities.

C. Exemplary and non-exhaustive example of information indirectly concerning the issuer, the publication of which may lead to material information that had not been considered Inside Information by the issuer becoming Inside Information.

In the event that government adopts a measure from which companies in the sector in which the issuer operates could benefit under certain conditions, the issuer may be the only one to know whether it already complies with the conditions and the amount of the benefit.

If the consensus of financial analysts increases the issuer's value on the basis of situations, facts, data or expectations that the issuer knows are not well-founded, such information could become Inside Information.

If the operator of a stock index includes the issuer's Financial Instruments in the same, the issuer, given that the information relates to it indirectly, does not disseminate a press release unless the information has a specific impact on the issuer's Financial Instruments that is not already known to the market.

Annex B

NOTIFICATION OF DELAY

(PURSUANT TO ARTICLE 17, PARAGRAPH 4 OF REGULATION (EU) 596/2014 AND IN ACCORDANCE WITH ARTICLE 4 OF IMPLEMENTING REGULATION (EU) 2016/1055)

1	IDENTITY OF THE ISSUER		
a)	Company name		
	Tax code		
2	IDENTIFYING DATA OF THE NOTIFYING PERSON		
a)	First name and surname	<i>First name</i>	<i>Surname</i>
b)	Position/title at issuer		
c)	Business contacts	Email address	<i>Telephone number</i>
3	INFORMATION ON THE PUBLICATION OF THE INSIDE INFORMATION SUBJECT TO DELAY ⁷		
a)	Subject matter of the Inside Information ⁸		
b)	Reference number assigned by the Regulated Information dissemination system [<i>insert name of SDIR system</i>]		
c)	Date and time of dissemination of the press release	<i>Date</i>	<i>Time</i>
4	IDENTIFICATION OF THE INSIDE INFORMATION		

⁷ This section is filled in after the dissemination to the market, pursuant to Article 17 of Regulation (EU) No 596/2014, of the "Document" containing the Inside Information

⁸ Indicate the information entered in the subject field in the SDIR system "New Public Statement" form

a)	Description of the Inside Information			
b)	Date and time of identification of the Inside Information	<i>Date</i>	<i>Time</i>	
5	INFORMATION ON THE DECISION TO DELAY THE INSIDE INFORMATION			
a)	Date and time when the decision to delay the disclosure of the Inside Information was taken	<i>Date</i>	<i>Time</i>	
b)	Projected time frame for public disclosure of the Inside Information			
6	IDENTITY OF THE PERSONS RESPONSIBLE WHO TOOK THE DECISION TO DELAY THE PUBLIC DISCLOSURE OF THE INSIDE INFORMATION			
		<i>First name</i>	<i>Surname</i>	<i>Position</i>
		<i>First name</i>	<i>Surname</i>	<i>Position</i>
		<i>First name</i>	<i>Surname</i>	<i>Position</i>
		<i>First name</i>	<i>Surname</i>	<i>Position</i>
7	REASON FOR THE DELAY ⁹			
a)	Indicate why public disclosure of the Inside Information subject to delay was deemed potentially detrimental to the legitimate interest of the Company			

⁹ The reasons for the delay will be provided to the competent authority upon request.

b)	Indicate why the delay in disclosure was not deemed to have the effect of misleading the public.
c)	Indicate what measures have been taken to (i) prevent access to Inside Information by unauthorised persons; and (ii) ensure timely public disclosure of Inside Information if the confidentiality of that information is no longer guaranteed.

Place and date _____ , _____

Signature

Annex C

TEMPLATE 1 AND TEMPLATE 2 OF ANNEX I TO IMPLEMENTING REGULATION (EU) 2022/1210

Template 1

Format for the insider lists referred to in Article 1, paragraph 1

Description of the source of the specific inside information:

Date and time of creation of this section (i.e. when the specific inside information was identified): [yyyy-mm-dd; hh:mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Surname(s) of the insider at birth (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Role and reason for being insider	Obtained (the date and time at which the insider obtained access to the inside information)	Ceased (the date and time at which the insider ceased to have access to the inside information)	National Identification Number (if applicable)	Date of birth	Personal telephone numbers (home and personal mobile telephone numbers)	Full Personal home address: (street name; street number; city; post code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[Address of issuer/emission allowance market participant/ auction platform/auctioneer/auction monitor or, of the person acting on their behalf or on their account]	[Text describing role, responsibilities and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[Number and/or text]	[yyyy-mm-dd]	[Numbers (no space)]	[Text]

Template 2

Permanent insiders section of the insider list

Date and time (of creation of the permanent insiders section) [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Surname(s) of the insider at birth (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Role and reason for being insider	Included (the date and time at which the insider was included in the permanent insider section)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Full personal home address (street name; street number; city; post code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[[Address of issuer/emission allowance market participant/ auction platform/auctioneer/auction monitor or third party of the insider]	[Text describing role, responsibilities and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[Number and/or text]	[Numbers (no space)]	[Full personal home address — (street name; street number; — city; — post code; — country]