TINEXTA

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Procedure for the management of the Registers of Individuals with access to Inside Information and Relevant Information

Summary

Foreword

This procedure (the "**Procedure**") has been adopted by Tinexta S.p.A. (the "**Company**" or the "**Issuer**") to implement Article 18 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (*Market Abuse Regulation*) ("**MAR**"), as implemented by European Regulation (EU) 2016/347 of the European Commission of 10 March 2016 (**"ITS 347"**). The obligations to establish and keep the Insider Register (as defined below) are designed to encourage operators to pay greater attention to the value of Inside Information and to stimulate the establishment of appropriate internal procedures to monitor its circulation prior to its disclosure to the public.

In compliance with the provisions of the MAR and ITS 347, the Company has established the Register of Individuals with access to Inside Information (the "**Insider Register**"). Pursuant to the provisions of said Article 7 of the MAR, "*Inside Information*" means "*information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments*" (see regulatory extract in Annex 'A').

In addition to the above, the Company has established a Register of Individuals with access to Relevant Information (the "***Relevant Information List***" or "**RIL**"). "*Relevant Information*" means information relating to data, events, projects or circumstances that, in an ongoing, recurrent, periodic, occasional or unforeseen manner, directly concern the Company and which may, at a later, or even imminent, date be classed as Inside Information ("**Relevant Information**").

The management and communication of Confidential, Relevant and Inside Information concerning the Issuer and its subsidiaries pursuant to Article 2359 of the Italian Civil Code and Article 93 of the Consolidated Finance Act (the "**Subsidiaries**" and, together with the Company, the "**Group**") are governed by the procedure called '*Procedure for the Management and Disclosure of Confidential, Relevant and Inside Information*' adopted by the Company and available on the website www.tinexta.com, to which reference should be made in full.

The provisions of this Procedure and any subsequent amendments and/or supplements shall enter into effect on the day of publication of the Procedure on the Company's website, or on a different day established by provisions of law or regulations or by resolution of the Board of Directors or, in urgent circumstances, by the Chairman of the Board of Directors or by the Managing Director.

The management and application of this Procedure is entrusted to the Inside Information Management Function ("**FGIP**"). The role of FGIP is entrusted to the

Managing Director of the Company, who delegates to the Person in Charge, identified as the Head of Corporate and Legal Affairs of the Company, the responsibility for keeping the Insider Register and the RIL.

1. Obligations relating to the Insider Register

1.1 Pursuant to Article 18(1) of the MAR, the Company:

(a) has established the Insider Register;

(b) promptly updates the Insider Register pursuant to Article 3 of this Procedure; and

(c) sends the Insider Register to the competent authority as soon as possible upon request from the latter.

1.2 The following persons must be recorded in the Insider Register: all those (i) who have access to Inside Information on a regular or occasional basis; (ii) with whom the Company has a professional working relationship (whether a subordinate employment or other contract); (iii) who, in performing certain duties, have access to Inside Information (such as advisers, accountants or credit rating agencies).

With regard to the requirement stated in point (i), it should be noted that access to Inside Information is obviously the circumstance that gives rise to the obligation of entry in the Insider Register and legitimises said entry, even if such access is only occasional.

2. Establishment of the Insider Register

2.1 The Company has established the Insider Register, which is structured into two distinct sections:

i) a section for each piece of inside information, in which a new section is added each time a new piece of Inside or Relevant Information is identified ("**Occasional Section**") ; ii) an additional section containing the data of the persons who always have access to all Inside Information ("**Permanent Section**"). Every time a new piece of Inside Information[1] is identified, a specific new Occasional Section is added to the Insider Register.

Each Occasional Section shall only contain the details of the persons who have access to the Inside Information relevant to the section. Without prejudice to the provisions of Article 2.4 below, persons to be entered in or removed from the Occasional Section shall be identified by the primarily manager within the FOCIP to which the Information refers or by another person authorised to do so, by the Person in Charge, as appointed by the FGIP and having consulted the FGIP, who shall promptly enter, update or remove them from the Occasional Section acting with due diligence, as described in greater detail in Article 3 below of the Procedure.

In any case, the responsibility for the proper keeping of the Insider Register and

[1] For example, a separate section shall be established for each contract, project, corporate or financial event, publication of the financial statements or announcement of lower than expected profits, etc.

the RIL, to the extent that this function is delegated to the Person in Charge, remains with the FGIP.

2.2 The Company shall draw up and update the Insider Register in electronic format so as to ensure, at all times, the confidentiality and accuracy of the information contained in the List and access to and the retrieval of previous versions of the Insider Register. The electronic format shall comply with Template 1 in Annex I of the ITS 347, reproduced in a paper format in Annex 'B' to this Procedure.

2.3 The details of individuals who have access at all times to all Inside Information (the "**Permanent Insiders**" and, together with the persons entered in the Occasional Section, the "**Listed Persons**") are instead entered in the Permanent Section. This section is drawn up in electronic format in accordance with Template 2 in Annex I of ITS 347, reproduced in paper format in Annex 'C' to this Procedure.

Details of the Permanent Insiders included in the Permanent Section shall not be included in the Occasional Sections of the Insider Register. For the purposes of this Procedure, the persons who hold the following positions or functions shall be listed in the Permanent Section: the FGIP, the direct management collaborator.

Any additional persons to be entered in or removed from the Permanent Section shall be identified by the Board of Directors or, in urgent circumstances, by the Managing Director, in agreement with the Chairman. The names of the Permanent Insiders to be entered or removed, as the case may be, shall be communicated to the Person in Charge (as defined below), who shall promptly include them in the Permanent Section of the Insider Register acting with due diligence, as described in greater detail in Article 3 below of the Procedure.

2.4 The Listed Persons must in turn identify, to the extent of their knowledge: (a) which other persons within their company structure and/or function within the Issuer or Group can have access to Inside Information, and (b) third parties that have a relationship of cooperation with the Company (for example, the auditing firm and/or legal and tax consultants and advisers, etc.) who (i) may have access to Inside Information and who should therefore be entered in an Occasional Section of the Insider Register, or (ii) who have ceased to have access to Inside Information and should therefore be removed from the Occasional Section of the Insider Register.

Pursuant to Article 3.3 below, the Listed Persons shall report the names of the person identified in accordance with the foregoing to the Person in Charge (as defined in Article 3.1 below), who having ascertained in agreement with the FGIP that said persons should effectively be entered in the Insider Register, shall promptly update the Insider Register acting with due diligence, as described in greater detail in Article 3 below of the Procedure.

3 Keeping, retaining and updating the Insider Register

3.1 The Person in Charge keeps the Insider Register as a delegate of the FGIP and, in accordance with the provisions of Article 2.2., after having

consulted the FGIP if required by this Procedure or if considered advisable, shall make and update the entries on the basis of the information received from the persons specified in Article 2.4 above.

Furthermore, he/she shall also monitor the persons entered in each of the Sections of the Insider Register, checking the accuracy of the entry with the persons specified in 2.4, who, pursuant to the provisions of said articles and in accordance with the methods and criteria stated therein, shall be entrusted with sending the Person in Charge information relating to the persons to be entered in or removed from the Section of the Insider Register. It should be understood that the Listed Persons shall be responsible for the quality of the information disclosed to the Person in Charge and the FGIP and shall be required to ensure the completeness and prompt updating thereof.

3.2 The Insider Register shall be promptly updated upon the occurrence of the following events:

(a) change to the reasons for the inclusion of a Listed Person in the Insider Register or, including cases where the registration of the person must be switched from one section of the Register to another;

(b) registration of new persons as they have access to Inside Information;

(c) loss of access to Inside Information by listed persons (in the “Permanent Section ” or in the “Occasional Sections”).

An update shall also be required, for each listed person, when they have access to the various subsequent phases of 'development' of the set of circumstances or the event that gives rise to the Inside Information. Each update shall specify the date and time when the change triggering the update occurred.

3.3 Data relating to the Listed Persons included in the Insider Register shall be retained for five years after their entry or updating.

The communications of Listed Persons to the Person in Charge relating to entries or updates and removals from the Sections of the Insider Register shall be sent in written form by e-mail to the address registro.informazioni@tinexta.com and registro.tinexta@computershare.it and shall contain all the information required for an accurate and complete entry and updating of the Insider Register pursuant to this Procedure. The Person in Charge shall enter the information received in the Insider Register. If the Person in Charge should find one or more details to be missing, he/she shall contact the Listed Persons, who shall promptly furnish the missing details. The Person in Charge shall promptly inform the person concerned of entry in the Insider Register and of any subsequent update (including deletion). To this end, the Person in Charge shall deliver to the Listed Persons or send them a specific communication, according to the schedules set out in Annex 'D', which the listed person must examine, by means of which information is provided to the Listed Persons regarding the entry in the Insider Register (or the subsequent update or cancellation from the same), as well as regarding the legal and regulatory obligations arising from this Procedure and the penalties applicable in the event

of its infringement. The Listed Persons inform the Company, according to the formats set out in Annex 'D', that they have acknowledged this Procedure and the legal and regulatory obligations deriving from access to Inside Information, and that they are aware of the applicable sanctions as indicated in Annex 'A'.

3.4 The Person in Charge keeps a copy of the communications sent on a permanent medium to guarantee proof and traceability of the fulfilment of the disclosure obligations. The Person in Charge delivers to the Listed Persons who request it a hard copy of the information concerning them contained in the Register.

4 Content of entries in the Insider Register and their updates

4.1 Taking into account the sections making up the Insider Register pursuant to Article 2 (i.e. Occasional Sections and Permanent Section), the Person in Charge shall enter the following information in the Insider Register:

(A) date and time of creation of each section, i.e. the date and time the Inside Information was identified;

(B) date and time of the most recent update of the Section;

(C) date of transmission to the competent authority;

(D) for each Listed Person:

- i date and time of the person's entry in the Insider Register, meaning the date and time the Listed Person had access to the Inside Information;
- ii identity of the person with access to the Inside Information:
  - (a) in the case of natural person it shall be necessary to state the forename, surname, professional and private telephone number (home landline and personal mobile), date of birth, tax code, full home address (street name, street number, city, post code, country), email address for communications concerning the Procedure;
  - (b) in the case of a legal entity, company or professional association, it shall be necessary to state the corporate name, registered office and VAT number, as well as the data set forth in letter (a) above relating to a reference person who is able to identify the persons (belonging to the legal entity, company or professional association or linked to said entity) who have had access to Inside Information;
- iii the company to which they belong and nature of their relationship with the Company;
- iv the reason for the person's entry in the Insider Register;
- v update and reason for update of the information contained in the Insider Register;
- vi date and time of each update of the information already entered in the

Insider Register;

vii deletion and reason for deletion from the Insider Register;

viii date and time of deletion of the person from the Insider Register, meaning the date and time the Listed Person ceased to have regular access to the Inside Information.

4.2 The Insider Register, at the request of CONSOB, is transmitted via the electronic medium indicated at the Authority's website.

5. Relevant information list (RIL)

5.1 The RIL is established with the aim of ensuring the traceability of persons who have had access to Relevant Information. Therefore, this RIL shall remain valid as long as the information (i) does not become Inside Information and is thus disclosed to the market, or (ii) although it is has become Inside Information, is subject to a delay procedure pursuant to the '*Procedure for the Management and External Disclosure of Confidential, Significant and Inside Information*', adopted by the Company. In the other cases in which the information is not classified as Inside Information and the characteristics underlying the identification of the Relevant nature are no longer valid, the RIL ceases to be updated and is closed.

In order to ensure the correct management of Inside Information and the Insider Register:

(a) persons belonging to the corporate bodies and competent inside information organisational functions ("**FOCIP**") who become aware of Relevant Information (also identified through the analysis of the flows referred to in paragraph 2 of the '*Procedure for Disclosure to the Public of Inside Information*'), as well as the persons who, for any reason, have access to Relevant Information, must be registered in the RIL;

(b) the RIL must be kept in compliance with the same indications provided with reference to the Insider Register by this Procedure.

5.2 The Person in Charge sends without delay to the person entered in the RIL a communication according to the schedules in Annex 'E' to this Procedure (i) of registration in the RIL, with reference to this Procedure, (ii) of deletion from the same, (iii) updates of the information contained therein, as well as the confidentiality obligations deriving from having access to Relevant Information. Each Person must - upon receipt of the initial communication and any subsequent communications relating to updates of the confidentiality obligations and/or this Procedure - respond by e-mail to (address indicated in the communication received), communicating that they have taken note of this Procedure and the confidentiality obligations indicated herein.

5.3 Data relating to the Listed Persons included in the RIL shall be retained for five years after their entry or update.

6 Personal data processing

6.1 For the purposes of this Procedure, the Company may be required to process certain personal data of the Listed Persons entered in the Insider Register and RIL. These persons shall therefore be required to grant their consent to the processing of their personal data, by the Company or by data processors and/or persons entrusted with processing appointed by the Company, pursuant to and under the terms of European Regulation 2016/679 on the processing of personal data and privacy, as adopted in Italy (the "**GDPR**"), as subsequently amended, being informed of the following:

(a) the purposes and procedures of the processing to be performed on the data;

(b) the mandatory nature of disclosure of the data;

(c) the persons or categories of person to whom the data may be disclosed and the scope of dissemination of the data;

(d) the rights enshrined in the GDPR;

(e) the forename and surname, corporate name and domicile, residence or registered office of the data controller: Tinexta S.p.A., with registered office in Rome, Piazzale Flaminio 1/B; e-mail: info@Tinexta.com.

When the communication referred to in Articles 3.3 and 5.2 has been duly signed by the Listed Person and delivered to the Person in Charge, consent shall be considered validly granted, pursuant to and for the purposes of the GDPR.

7. Amendments and supplements

7.1 The provisions of this Procedure shall be updated and/or supplemented by and under the responsibility of the Company's Board of Directors, taking into account the provisions of applicable laws or regulations, as well as the implementation experience gained and market practices developed.

7.2 If it should be necessary to update and/or supplement individual provisions of the Procedure as a result of changes in the applicable rules of law or regulations, or of specific requests from supervisory bodies, implementation experience and market practices, as well as in cases of proven urgency, this Procedure may be amended and/or supplemented by the Chairman of the Board of Directors or by the Managing Director, with subsequent ratification of the amendments and/or supplements by the Board of Directors in the first meeting following the action taken.

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Annexes:

- Annex 'A': Regulatory extract
- Annex 'B': Template 1, Annex I, ITS 347

- Annex 'C': Template 2, Annex I, ITS 347
- Annex 'D': Insider Register communications template
- Annex 'E': RIL communications template

ANNEX 'A'

REGULATORY EXTRACT

Below is a brief description of the regulations and sanctions envisaged by the MAR, Consolidated Finance Act and the applicable regulations for offences of (i) abuse of Inside Information and (ii) market manipulation.

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Regulation No. 596/2014 of the European Parliament and of the Council of 16 April 2014 (MAR) Article 7 (*Inside Information*)

1.For the purposes of this regulation, inside information means:

a) information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments;

b)in relation to commodity derivatives, information of a precise nature, which has not been made public, relating, directly or indirectly to one or more such derivatives or relating directly to the related spot commodity contract, and which, if it were made public, would be likely to have a significant effect on the prices of such derivatives or related spot commodity contracts, and where this is information which is reasonably expected to be disclosed or is required to be disclosed in accordance with legal or regulatory provisions at the Union or national level, market rules, contract, practice or custom, on the relevant commodity derivatives markets or spot markets;

c)in relation to emission allowances or auctioned products based thereon, information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more such instruments, and which, if it were made public, would be likely to have a significant effect on the prices of such instruments or on the prices of related derivative financial instruments;

d)for persons charged with the execution of orders concerning financial instruments, it also means information conveyed by a client and relating to the client's pending orders in financial instruments, which is of a precise nature, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments, the price of related spot commodity contracts, or on the price of related derivative financial instruments.

2.For the purposes of paragraph 1, information shall be deemed to be of a precise nature if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of

circumstances or event on the prices of the financial instruments or the related derivative financial instrument, the related spot commodity contracts, or the auctioned products based on the emission allowances. In this respect in the case of a protracted process that is intended to bring about, or that results in, particular 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.

3. 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.

4. For the purposes of paragraph 1, information which, if it were made public, would be likely to have a significant effect on the prices of financial instruments, derivative financial instruments, related spot commodity contracts, or auctioned products based on emission allowances shall mean information a reasonable investor would be likely to use as part of the basis of his or her investment decisions.

In the case of participants in the emission allowance market with aggregate emissions or rated thermal input at or below the threshold set in accordance with the second subparagraph of Article 17(2), information about their physical operations shall be deemed not to have a significant effect on the price of emission allowances, of auctioned products based thereon, or of derivative financial instruments.

5.ESMA shall issue guidelines to establish a non-exhaustive indicative list of information which is reasonably expected or is required to be disclosed in accordance with legal or regulatory provisions in Union or national law, market rules, contract, practice or custom, on the relevant commodity derivatives markets or spot markets as referred to in point (b) of paragraph 1. ESMA shall duly take into account specificities of those markets.

Article 17 (***Public disclosure of inside information***)

1. An issuer shall inform the public as soon as possible of inside information which directly concerns that issuer.

The issuer shall ensure that the inside information is made public in a manner which enables fast access and complete, correct and timely assessment of the information by the public and, where applicable, in the officially appointed mechanism referred to in Article 21 of Directive 2004/109/EC of the European Parliament and the Council. The issuer shall not combine the disclosure of inside information to the public with the marketing of its activities. The issuer shall post and maintain on its website for a period of at least five years, all inside information it is required to disclose publicly.
This Article shall apply to issuers who have requested or approved admission of their financial instruments to trading on a regulated market in a Member State or, in the case of instruments only traded on an MTF or on an OTF, issuers who have approved trading of their financial instruments on an MTF or an OTF or have

requested admission to trading of their financial instruments on an MTF in a Member State.

2. An emission allowance market participant shall publicly, effectively and in a timely manner disclose inside information concerning emission allowances which it holds in respect of its business, including aviation activities as specified in Annex I to Directive 2003/87/EC or installations within the meaning of Article 3(e) of that Directive which the participant concerned, or its parent undertaking or related undertaking, owns or controls or for the operational matters of which the participant, or its parent undertaking or related undertaking, is responsible, in whole or in part. With regard to installations, such disclosure shall include information relevant to the capacity and utilisation of installations, including planned or unplanned unavailability of such installations. The first subparagraph shall not apply to a participant in the emission allowance market where the installations or aviation activities that it owns, controls or is responsible for, in the preceding year have had emissions not exceeding a minimum threshold of carbon dioxide equivalent and, where they carry out combustion activities, have had a rated thermal input not exceeding a minimum threshold.

The Commission shall be empowered to adopt delegated acts in accordance with Article 35 establishing a minimum threshold of carbon dioxide equivalent and a minimum threshold of rated thermal input for the purposes of the application of the exemption provided for in the second subparagraph of this paragraph.

3. The Commission shall be empowered to adopt delegated acts in accordance with Article 35 specifying the competent authority for the notifications of paragraphs 4 and 5 of this Article.

4. An issuer or an emission allowance market participant, may, on its own responsibility, delay disclosure to the public of inside information provided that all of the following conditions are met:

a)immediate disclosure is likely to prejudice the legitimate interests of the issuer or emission allowance market participant;

b)delay of disclosure is not likely to mislead the public;

c) the issuer or emission allowance market participant is able to ensure the confidentiality of that information.

In the case of a protracted process that occurs in stages and that is intended to bring about, or that results in, a particular circumstance or a particular event, an issuer or an emission allowance market participant may on its own responsibility delay the public disclosure of inside information relating to this process, subject to points (a), (b) and (c) of the first subparagraph.

Where an issuer or emission allowance market participant has delayed the disclosure of inside information under this paragraph, it shall inform the competent authority specified under paragraph 3 that disclosure of the information was delayed and shall provide a written explanation of how the conditions set out in this paragraph were met, immediately after the information is disclosed to the public. Alternatively, Member States may provide that a

record of such an explanation is to be provided only upon the request of the competent authority specified under paragraph 3.

By way of derogation from the third subparagraph of this paragraph, an issuer whose financial instruments are admitted to trading only on an SME growth market shall provide a written explanation to the competent authority specified under paragraph 3 only upon request. As long as the issuer is able to justify its decision to delay, the issuer shall not be required to keep a record of that explanation.

5. In order to preserve the stability of the financial system, an issuer that is a credit institution or a financial institution, may, on its own responsibility, delay the public disclosure of inside information, including information which is related to a temporary liquidity problem and, in particular, the need to receive temporary liquidity assistance from a central bank or lender of last resort, provided that all of the following conditions are met:

a) the disclosure of the inside information entails a risk of undermining the financial stability of the issuer and of the financial system;

b) it is in the public interest to delay the disclosure;

c) the confidentiality of that information can be ensured; and

d) the competent authority specified under paragraph 3 has consented to the delay on the basis that the conditions in points (a), (b) and (c) are met.

6. For the purposes of points (a) to (d) of paragraph 5, an issuer shall notify the competent authority specified under paragraph 3 of its intention to delay the disclosure of the inside information and provide evidence that the conditions set out in points (a), (b) and (c) of paragraph 5 are met. The competent authority specified under paragraph 3 shall consult, as appropriate, the national central bank or the macro-prudential authority, where instituted, or, alternatively, the following authorities:

a) where the issuer is a credit institution or an investment firm the authority designated in accordance with Article 133(1) of Directive 2013/36/EU of the European Parliament and of the Council;

b) in cases other than those referred to in point (a), any other national authority responsible for the supervision of the issuer.

The competent authority specified under paragraph 3 shall ensure that disclosure of the inside information is delayed only for a period as is necessary in the public interest. The competent authority specified under paragraph 3 shall evaluate at least on a weekly basis whether the conditions set out in points (a), (b) and (c) of paragraph 5 are still met.

If the competent authority specified under paragraph 3 does not consent to the delay of disclosure of the inside information, the issuer shall disclose the inside information immediately.

This paragraph shall apply to cases where the issuer does not decide to delay the disclosure of inside information in accordance with paragraph 4.

Reference in this paragraph to the competent authority specified under

paragraph 3 is without prejudice to the ability of the competent authority to exercise its functions in any of the ways referred to in Article 23(1).

7.Where disclosure of inside information has been delayed in accordance with paragraph 4 or 5 and the confidentiality of that inside information is no longer ensured, the issuer or the emission allowance market participant shall disclose that inside information to the public as soon as possible. This paragraph includes situations where a rumour explicitly relates to inside information the disclosure of which has been delayed in accordance with paragraph 4 or 5, where that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured.

8.Where an issuer or an emission allowance market participant, or a person acting on their behalf or for their account, discloses any inside information to any third party in the normal course of the exercise of an employment, profession or duties as referred to in Article 10(1), they must make complete and effective public disclosure of that information, simultaneously in the case of an intentional disclosure, and promptly in the case of a non-intentional disclosure. This paragraph shall not apply if the person receiving the information owes a duty of confidentiality, regardless of whether such duty is based on a law, on regulations, on articles of association, or on a contract.

(*omitted*)

Article 18 (*Insider lists*)

1.Issuers or any person acting on their behalf or on their account, shall:

a) draw up a list of all persons who have access to inside information and who are working for them under a contract of employment, or otherwise performing tasks through which they have access to inside information, such as advisers, accountants or credit rating agencies (insider list);

b) promptly update the insider list in accordance with paragraph 4; and

c) provide the insider list to the competent authority as soon as possible upon its request.

2.Issuers or any person acting on their behalf or on their account, shall take all reasonable steps to ensure that any person on the insider list acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information.

Where another person acting on behalf or on the account of the issuer assumes the task of drawing up and updating the insider list, the issuer remains fully responsible for complying with this Article. The issuer shall always retain a right of access to the insider list.

3.The insider list shall include at least:

a) the identity of any person having access to inside information;

b) the reason for including that person in the insider list;

c) the date and time at which that person obtained access to inside information;

and

d) the date on which the insider list was drawn up.

4. Issuers or any person acting on their behalf or on their account shall update the insider list promptly, including the date of the update, in the following circumstances:

a) where there is a change in the reason for including a person already on the insider list;

b) where there is a new person who has access to inside information and needs, therefore, to be added to the insider list; and

c) where a person ceases to have access to inside information.

Each update shall specify the date and time when the change triggering the update occurred.

5. Issuers or any person acting on their behalf or on their account shall retain the insider list for a period of at least five years after it is drawn up or updated.

6. Issuers whose financial instruments are admitted to trading on an SME growth market shall be permitted to include on their insider lists only persons who, by virtue of the functions they perform or position they hold with the issuer, have regular access to inside information.

By way of derogation from the first subparagraph of this paragraph and where justified by specific national market integrity concerns, Member States may require issuers whose financial instruments are admitted to trading on an SME growth market to include in their insider lists all persons referred to in point (a) of paragraph 1. Those lists contain information specified in the format determined by ESMA in accordance with the fourth subparagraph of this paragraph.

The lists of persons with access to inside information referred to in the first and second sub-paragraphs of this paragraph shall be provided as soon as possible to the competent authority that requests it.

ESMA shall develop draft implementing technical standards to determine the precise format of the insider lists referred to in the second subparagraph of this paragraph. The format of the insider lists shall be proportionate and represent a lighter administrative burden compared to the format of insider lists referred to in paragraph 9.

ESMA shall submit those draft implementing technical standards to the Commission by 1 September 2020.

Power is conferred on the Commission to adopt the implementing technical standards referred to in the fourth subparagraph of this paragraph in accordance with Article 15 of Regulation (EU) No 1095/2010.

7. This Article shall apply to issuers who have requested or approved admission of their financial instruments to trading on a regulated market in a Member State or, in the case of an instrument only traded on an MTF or an OTF, have approved trading of their financial instruments on an MTF or an OTF or have requested admission to trading of their financial instruments on an MTF in a Member State.

8.Paragraphs 1 to 5 of this Article shall also apply to:

a)emission allowance market participants in relation to inside information concerning emission allowances that arises in relation to the physical operations of that emission allowance market participant;

b)any auction platform, auctioneer and auction monitor in relation to auctions of emission allowances or other auctioned products based thereon that are held pursuant to Regulation (EU) No 1031/2010.

9.In order to ensure uniform conditions of application of this Article, ESMA shall develop draft implementing technical standards to determine the precise format of insider lists and the format for updating insider lists referred to in this Article.

ESMA shall submit those draft implementing technical standards to the Commission by 3 July 2016.

Power is conferred on the Commission to adopt the implementing technical standards referred to in the first subparagraph in accordance with Article 15 of Regulation (EU) No 1095/2010.

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Italian Legislative Decree no. 58 of 24 February

1998 (TUF)[2] Article 184 (***Abuse of inside information***)

1.A term of imprisonment ranging from two to twelve years and of a fine ranging from twenty thousand to three million euro is the punishment established by law for anyone who, in possession of inside information on account of his/her capacity as member of the issuer's administration, management or control bodies, participation in the issuer's share capital or exercise of employment, profession or duty, including a public duty, or office:

a) purchases, sells or performs other transactions, directly or indirectly, on his/her own behalf or that of a third party, on financial instruments using such information;

b)discloses the information to others outside the normal exercising of their employment, profession, duties or office or of a market survey carried out pursuant to Article 11 of Regulation (EU) No 596/2014;

c)recommends or induces others, on the basis of the information, to carry out any of the transactions stated in letter a).

2.The same punishment referred to in paragraph 1 shall apply to anyone who, being in possession of inside information by reason of the preparation or execution of criminal activities, carries out any of the actions referred to in the same paragraph 1.

3.The court may increase the fine by up to three times or up to the amount of ten times the product or profit obtained from the offence (if greater) when, due to the

[2] Pursuant to Article 39(1) of Italian Law no. 262 of 28 December 2005, the penalties provided for in Part V, Title I-bis, Chapter II are doubled within the limits set for each type of penalty by Book I, Title II, Chapter II of the Italian Criminal Code.

material offence of the act, the personal qualities of the perpetrator or the size of the product or profit achieved by the offence, it appears inadequate even if applied to the maximum extent.

3-bis. In the case of transactions relating to financial instruments referred to in Article 180(1)(a)(2), (2-bis) and (2-ter), limited to financial instruments whose price or value depends on the price or on the value of a financial instrument referred to in numbers (2) and (2-bis) or has an effect on that price or value, or relating to auctions on an auction platform authorised as a regulated market of emission allowances, the penalty shall be a fine of up to one hundred and three thousand and two hundred and ninety-one euro and of up to three years' imprisonment.

Art. 185 (*Market manipulation*)

1. Anyone who disseminates false information or carries out simulated transactions or other artifices concretely capable of causing a significant alteration in the price of financial instruments shall be punished with imprisonment from two to twelve years and a fine ranging between twenty thousand and five million euro.

1- bis. Anyone who has committed the offence through purchase orders or transactions carried out for legitimate reasons and in compliance with permitted market normal practice, pursuant to Article 13 of Regulation (EU) 596/2014, is not punishable.

2.The court may increase the fine by up to three times or up to the amount of ten times the product or profit obtained from the offence (if greater) when, due to the material offence of the act, the personal qualities of the perpetrator or the size of the product or profit achieved by the offence, it appears inadequate even if applied to the maximum extent.

2- bis. In the case of transactions relating to financial instruments referred to in Article 180(1)(a)(2), (2-bis) and (2-ter), limited to financial instruments whose price or value depends on the price or on the value of a financial instrument referred to in numbers (2) and (2-bis) or has an effect on that price or value, or relating to auctions on an auction platform authorised as a regulated market of emission allowances, the penalty shall be a fine of up to one hundred and three thousand and two hundred and ninety-one euro and of up to three years' imprisonment.

2-ter. The provisions of this article also apply:

a)to acts concerning spot commodity contracts that are not wholesale energy products, capable of causing a significant alteration in the price or value of the financial instruments referred to in Article 180(1)(a);

b)to acts concerning financial instruments, including derivative contracts or derivative instruments for the transfer of credit risk, capable of causing a significant alteration in the price or value of a spot commodity contract, if the price or value depends on the price or value of these financial instruments;

c) acts concerning benchmarks.

Article 186 (*Accessory sentences*)

1. Conviction for any of the offences set forth in this chapter entails the application of the accessory sentences provided for in Articles 28, 30, 32-bis and 32-ter of the Italian Criminal Code for a duration of no less than six months and no more than two years, as well as publication of the ruling in at least two newspapers, one of which is economic, with national circulation.

Article 187 (*Confiscation*)

1. In the event of a conviction for one of the offences set forth in this chapter, the product or profit obtained from the offence and the assets used to commit it shall be confiscated.

2. Where it is impossible to carry out the confiscation pursuant to paragraph 1, it may involve a sum of money or assets of equivalent value.

3. For anything not established in paragraphs 1 and 2, the provisions of Article 240 of the Italian Criminal Code shall apply.

Article 187-*bis* (*Abuse and unlawful disclosure of inside information*)

1. Without prejudice to criminal sanctions when the act constitutes a crime, anyone who violates the prohibition of abuse of inside information and unlawful disclosure of inside information referred to in Article 14 of Regulation (EU) 596/2014 shall be punished with an administrative fine from twenty thousand to five million euro.

5. The administrative fines established by this article may be increased by up to triple or up to the amount of ten times the profit obtained or the losses avoided as a result of the offence (if greater) when, in view of the criteria listed in Article 194-bis and the extent of the product or of the profit from the offence, the penalties appear inadequate even when applied in the maximum amount.

6. For the cases envisaged by this article, an attempt is equivalent to perpetration

Article 187-*ter* (*Market manipulation*)

1. Without prejudice to criminal sanctions when the act constitutes a crime, anyone who violates the prohibition of market manipulation referred to in Article 15 of Regulation (EU) 596/2014 shall be punished with a fine from twenty thousand to five million euro.

2. The provision of Article 187-bis(5) applies.

4. Anyone who is able to prove having acted for legitimate reasons and in compliance with normal market practices accepted in the market concerned may not be subject to an administrative sanction pursuant to this article.

Article 187-*ter*.1 (*Sanctions relating to violations of the provisions of Regulation (EU) 596/2014 of the European Parliament and of the Council of 16 April 2014)*

1. With respect to an entity or a company, in the event of violation of the obligations set forth in Article 16(1) and (2), Article 17(1), (2), (4), (5) and (8) of Regulation (EU) 596/2014, the delegated acts and the relative technical regulatory and implementation rules, as well as Article 114(3) of this decree, an administrative fine of from five thousand up to two million five hundred thousand euro, or two

percent of the turnover, shall be applied when this amount exceeds two million five hundred thousand euro and the turnover can be determined pursuant to Article 195(1-bis).

2. If the violations indicated in paragraph 1 are committed by a natural person, an administrative fine of from five thousand up to one million euro is applied to the latter.

3. Without prejudice to the provisions of paragraph 1, the sanction indicated in paragraph 2 shall apply to corporate officers and personnel of the company or entity responsible for the violation in the cases provided for by Article 190-bis(1)(a).

4. With respect to an entity or a company, in the event of violation of the obligations set forth in Article 16(1) to (6), Article 19(1), (2), (3), (5), (6), (7) and (11) and Article 20(1) of Regulation (EU) 596/2014, the delegated acts and the relative technical regulatory and implementation rules, an administrative fine of from five thousand up to one million euro is applied.

5. If the violations indicated in paragraph 4 are committed by a natural person, an administrative fine of from five thousand euros up to five hundred thousand euros is applied to the latter.

6. Without prejudice to the provisions of paragraph 4, the sanction indicated in paragraph 5 shall apply to corporate officers and personnel of the company or entity responsible for the violation in the cases envisaged by Article 190-bis(1)(a).

7. If the advantage obtained by the perpetrator of the violation as a result of the violation is higher than the maximum limits indicated in this article, the administrative fine shall be raised to triple the amount of the advantage obtained, provided that this amount can be determined.

8. Consob, also together with the administrative fines envisaged by this article, may apply one or more of the administrative measures provided for by Article 30(2)(a) to (g) of Regulation (EU) 596/2014.

9. When the infringements are characterised by low offensiveness or dangerousness, Consob, without prejudice to the right to order the confiscation pursuant to Article 187-sexies, may apply one of the following administrative measures in place of the fines provided for by this article:

a) an order to eliminate the alleged infringements, with an indication, if necessary, of the measures to be taken and the deadline for compliance, and to refrain from repeating them;

b) a public statement regarding the violation committed and the person responsible when the alleged infringement has ceased.

10. Non-compliance with the obligations established by the measures referred to in Article 30(2) of Regulation (EU) 596/2014, within the established term, shall entail the increase of up to one-third of the administrative fine imposed or the application of the administrative fine envisaged for the originally disputed violation increased up to one-third.

11. Articles 6, 10, 11 and 16 of Italian Law 689 of 24 November 1981 do not apply to the administrative pecuniary penalties set forth in this article.

Article 187-quater (***Prohibition orders***)

1. The application of the administrative fines provided for by Articles 187-bis and 187-ter implies:

a) temporary disqualification from carrying out administration, management and control functions at subjects authorised pursuant to this decree, Italian Legislative Decree 385 of 1 September 1993, Italian Legislative Decree 209 of 7 September 2005 or at pension funds;

b) temporary disqualification from performing administration, management and control function at listed companies and companies belonging to the same group of listed companies;

c) suspension from the Register, pursuant to Article 26(1)(d) and (1-bis) of Italian Legislative Decree no. 39, of the statutory auditor, the independent auditing company or the person in charge of the engagement;

d) suspension from the register referred to in Article 31(4) for financial advisers authorised for door-to-door selling;

e) the temporary loss of the integrity requirements for the participants in the capital of the subjects indicated in letter a).

1- bis. Without prejudice to the provisions of paragraph 1, Consob, with the measure applying the administrative fines provided for by Article 187-ter.1, may apply the prohibition orders indicated in paragraph 1(a) and (b).

2. The prohibition orders referred to in paragraphs 1 and 1-bis have a duration of no less than two months and no more than three years.

2- bis. When the offender has already committed one of the offences set forth in Chapter II or a violation, with fraudulent intent or gross negligence, of the provisions of Articles 187-bis and 187-ter two or more times in the last ten years, the accessory administrative sanction of permanent disqualification from carrying out the functions of administration, management and control within the subjects indicated in paragraph 1(a) and (b) shall apply in the event that the disqualification has already been applied to the same subject for a total period of not less than five years.

3. With the measure of applying the administrative pecuniary penalties provided for by this chapter, CONSOB, taking into account the seriousness of the violation and the degree of offence, may order authorised subjects, market operators, listed issuers and independent auditors not to make use of the perpetrator of the violation in the exercising of their activities and for a period not exceeding three years, and request the competent professional associations to temporarily suspend the person enrolled in the association from exercising his or her professional activity, as well as impose against the perpetrator of the violation temporary disqualification from concluding transactions or of placing direct orders to buy and sell financial instruments for a period not exceeding three years.

Article 187-quinquies (*Liability of the entity*)

1. The entity shall be punished with an administrative fine from twenty thousand up to fifteen million euro, or up to fifteen per cent of turnover when this amount is higher than fifteen million euro, and the turnover can be determined pursuant to Article 195(1-bis) in the event that a violation of the prohibition referred to in Article 14 or the prohibition referred to in Article 15 of Regulation (EU) 596/2014 is committed in its interest or to its advantage:

a) by persons who perform functions of representation, administration or management of the entity or of one of its organisational units with financial or functional independence as well as by persons who exercise management and control over it, including on a de facto basis;

b) by persons subject to the management or supervision of one of the subjects referred to in letter a).

2. If, following the commission of the offences referred to in paragraph 1, the product or profit obtained by the entity is of a significant size, the penalty shall be increased by up to ten times said product or profit.

3. The entity will not be liable if it proves that the persons indicated in paragraph 1 acted only in their own interest or in that of third parties.

4. In relation to the offenses referred to in paragraph 1, Articles 6, 7, 8 and 12 of Legislative Decree no. 231 will apply. The Italian Ministry of Justice makes the observations referred to in Article 6 of Italian Legislative Decree 231, having consulted CONSOB, with regard to the offences envisaged by this title.

Article 187-*sexies* (*Confiscation*)

1. The application of the administrative fines envisaged by this chapter entails the confiscation of the product or the profit of the offence.

2. Where it is impossible to carry out the confiscation pursuant to paragraph 1, it may involve sums of money, assets or other benefits of equivalent value.

3. Under no circumstances may the confiscation of assets that do not belong to one of the persons to whom the administrative fine is applied be ordered.

Article 187-*septies* (*Sanctioning procedure*)

1. The administrative sanctions envisaged by this chapter are applied by Consob with a reasoned measure, subject to formal notice of debits to the interested parties, to be carried out within one hundred and eighty days of the assessment or within three hundred and sixty days if the interested party resides or has its registered office abroad. The interested parties may, within thirty days of the formal notice, submit pleadings and request a personal hearing during the preliminary investigation, in which they may also participate with the assistance of a lawyer.

2. The sanctioning procedure is governed by the adversarial principle, knowledge of the investigative acts, the taking of minutes as well as the distinction between investigative and decision-making functions.

4. An appeal to the court of appeal in whose district the registered office or

residence of the opponent is located is permitted in opposing the measure that applies the sanction. If the opponent does not have its registered office or residence in the State, the court of appeal of the place where the violation was committed has jurisdiction. When these criteria are not applicable, the Court of Appeal of Rome has jurisdiction. The appeal is notified, under penalty of forfeiture, to the Authority that issued the measure within thirty days from the communication of the challenged measure, or sixty days if the claimant lives abroad, and it is filed with the court registry, together with the documents offered in the communication, within the binding term of thirty days from the notice.

5. Such an objection does not suspend execution of the measure. If there are serious grounds, the court of appeal may order the suspension with an order that cannot be challenged.

6. The Presiding Judge of the court of appeal appoints the judge-rapporteur and sets a public hearing for discussion of the objections by decree. The decree is served on the parties by the registry at least sixty days before the hearing. The Authority files briefs and documents within ten days before the hearing. If the appellant does not appear at the first hearing without providing indications of any legitimate impediment, the court, with an order that can be appealed to the court of cassation, shall declare the appeal inadmissible, charging the appellant with the costs of the proceedings.

6-bis. At the hearing, the court of appeal shall arrange, including ex officio, the means of proof it deems necessary, as well as the personal hearing of the parties who have requested it. Subsequently, the parties shall proceed to the oral discussion of the case. The judgement shall be filed with the registry within sixty days. When at least one of the parties expresses an interest in the advance publication of the ruling, the ruling shall be published by filing with the court registry no later than seven days from the hearing.

6-ter. With the ruling, the court of appeal may reject the objections, charging the appellant with the costs of the proceedings or accepting it, cancelling all or part of the measure or reducing the amount or duration of the sanction.

7. A copy of the judgement is sent, by the clerk of the court of appeal, to the Authority that issued the order, including for the purposes of the publication envisaged by Article 195-bis.

8. Article 16 of Italian Law 689 of 24 November 1981 does not apply to the administrative fines set forth in this chapter.

Annex 'B'

Annex I of ITS 347

TEMPLATE 1

Insider list: section related to [Name of the deal-specific or event-based inside information]

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

Date and time (most recent update): [*yyyy-mm-dd, hh: mm UTC*

*(Coordinated Universal Time)***] Date of transmission to the competent**

authority: [*yyyy-mm-dd***]**

Forename of the insider	**Surname** of the insider	**Birth name** of the insider (if different)	**Professional phone numbers** (professional direct landline and mobile)	**Company name and address**	**Function and reason for being an insider**	**Obtained** (date and time at which the insider obtained access to inside information)	**Ceased** (date and time at which the insider ceased to have access to inside information)	**Date of birth**	**National Identification Number** (if applicable)	**Personal telephone numbers** (home landline and personal mobile telephone numbers)	**Full home address:** (street name, street number, city, postcode, Country)
[text]	[text]	[text]	[numbers (no spaces)]	[address of issuer/emission allowance market participant/auction platform/auctioneer/auction monitor or third party of insider]	[text describing role, function and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[Number and/or text]	[numbers (no spaces)]	[full home address of the insider — street name and number — City — Postcode — Country]

Annex 'C'

Annex I of ITS 347

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 (most recent update): [*yyyy-mm-dd, hh: mm UTC*

*(Coordinated Universal Time)***] Date of transmission to the competent**

authority: [*yyyy-mm-dd***]**

Forename of the insider	**Surname** of the insider	**Birth name** of the insider (if different)	**Professional telephone number (s)** (professional direct landline and mobile)	**Company name and address**	**Function and reason for being insider**	**Entered** (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 landline and personal mobile telephone numbers)	**Full home address**: (street name, street number, city, postcode, Country)

[text]	[text]	[text]	[numbers (no spaces)]	[Address of issuer/emission allowance market participant/auction platform/auctioneer/auction monitor or third party of insider]	[text describing role, function and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[Number and/or text]	[Numbers (no space)]	[Text: full home address of the insider — street name and number — City — Post code — Country]

Annex 'D'
INSIDER REGISTER COMMUNICATIONS TEMPLATE

Scheme 1

Notification of registration in the Register and report on the processing of personal data of individuals entered in the Register of persons with access to inside information pursuant to Regulation 596/2014/EU

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the register of persons with access to Inside Information pursuant to Article 7 of the MAR (the "**Insider Register**").

We hereby inform you, pursuant to Article 18(2) of the MAR, that your personal data have been entered in said Insider Register for the reason communicated to you by *email*.

It should be noted that holders of inside information pertaining to the Company, for the purposes of its dissemination, must comply with the provisions contained in the Procedure for the management and external disclosure of Confidential, Relevant and Inside Information (the "**Procedure**"), which is attached hereto and may also be viewed on the website www.tinexta.com.

We also wish to remind you that non-compliance with the provisions relating to corporate information constitutes the criminal and administrative offences identified as abuse of inside information and market manipulation and may give rise to situations involving the administrative liability of the Company. In the event that, due to an infringement of the provisions on corporate information resulting from non-compliance with the principles established by the Procedure, the Company should incur administrative fines pursuant to the regulations in force, the Company will also take steps to take action against those responsible for such infringements to obtain repayment of charges relating to the payment of said penalties.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Please send a copy of this communication, signed by way of acknowledgement and acceptance, by e-mail to the following addresses: registro.informazioni@tinexta.com and registro.tinexta@computershare.it.

* * *

We wish to inform you that the personal data necessary for registration in the Insider Register and for the related updates will be processed and stored by the Company, with the help of electronic media, in compliance with the provisions of the Privacy Regulations (meaning Italian privacy legislation, European Regulation 2016/679 - GDPR - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and

the provisions of the Privacy Guarantor on personal data protection), in order to fulfil the obligations deriving from current legislation on market abuse and the processing of Inside Information and for the period required by the aforementioned legislation. We inform you that this data processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. The communication of the personal data requested is therefore mandatory; the data may be communicated for the same purposes to the competent authorities, to companies that provide services to the Company, which will act as Data Controllers or Processors, in the latter case upon appointment. Failure to grant them could expose you and/or Tinexta S.p.A. to possible sanctions pursuant to the regulations in force and/or the Procedure.

Lastly, we hereby inform you that the Data Controller in question is Tinexta S.p.A., with registered office in Rome, Piazzale Flaminio no. 1/B; e-mail: info@Tinexta.com.

We hereby inform you that you may exercise the rights accorded to you by the applicable legislation at any time, including:

a) accessing your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes;

b) obtaining the immediate rectification of inaccurate personal data concerning you;

c) obtaining, in the cases envisaged, the erasure of your data;

d) obtaining the limitation of the processing or objecting to it, when possible;

e) requesting the portability of the data you have provided to the Data Controller, i.e. their receipt in a structured, commonly used and machine readable format, and to transmit such data to another Data Controller, without any impediment by the Data Controller itself.

You may also lodge a complaint with the Personal Data Protection Guarantor pursuant to Article 77 of the GDPR.

To exercise these rights, simply contact the Data Controller by writing to the e-mail address:

info@Tinexta.com.

The person in charge of keeping the Insider Register.

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The undersigned hereby declares that s/he is aware of the obligations envisaged by the EU and national provisions applicable from time to time on the processing of Relevant Information and Inside Information and has received adequate information, as well as a full copy of the Procedure, and accepts the content thereof, undertaking to comply with its requirements.

To mark acceptance and acknowledgement of the Procedure.

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Scheme 2

Updating of the data entered in the Insider Register

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the register of persons with access to Inside Information pursuant to Article 7 of the MAR (the "**Insider Register**").

Following what has already been communicated to you on [●] with reference to your inclusion in the Insider Register, we hereby inform you that following [●], the reason for your registration in the Insider Register has been updated.

It should be noted that holders of inside information pertaining to the Company, for the purposes of its dissemination, must comply with the provisions contained in the Procedure for the management and external disclosure of Confidential, Relevant and Inside Information (the "**Procedure**"), which is attached hereto and may also be viewed on the website www.tinexta.com.

We also wish to remind you that non-compliance with the provisions relating to corporate information constitutes the criminal and administrative offences identified as abuse of inside information and market manipulation and may give rise to situations involving the administrative liability of the Company. In the event that, due to an infringement of the provisions on corporate information resulting from non-compliance with the principles established by the Procedure, the Company should incur administrative fines pursuant to the regulations in force, the Company will also take steps to take action against those responsible for such infringements to obtain repayment of charges relating to the payment of said penalties.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Please send a copy of this communication, signed by way of acknowledgement and acceptance, by email to the following addresses: registro.informazioni@tinexta.com and registro.tinexta@computershare.it.

* * *

We wish to inform you that the personal data necessary for registration in the Insider Register and for the related updates will be processed and stored by the Company, with the help of electronic media, in compliance with the provisions of the Privacy Regulations (meaning Italian privacy legislation, European Regulation 2016/679 - GDPR - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and the provisions of the Privacy Guarantor on personal data protection), in order to fulfil the obligations deriving from current legislation on market abuse and the processing of Inside Information and for the period required by the aforementioned legislation. We inform you that this data processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. The communication of the personal data requested is therefore mandatory; the data may be communicated for the same purposes to the competent authorities, to companies that provide services to the Company, which will act as Data Controllers or Processors, in the latter case upon appointment. Failure to grant them could expose you and/or Tinexta S.p.A. to possible sanctions pursuant to the regulations in force and/or the Procedure.

Lastly, we hereby inform you that the Data Controller in question is Tinexta S.p.A., with registered office in Rome, Piazzale Flaminio no. 1/B; e-mail: info@Tinexta.com.

We hereby inform you that you may exercise the rights accorded to you by the applicable legislation at any time, including:

a) accessing your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes;

b) obtaining the immediate rectification of inaccurate personal data concerning you;

c) obtaining, in the cases envisaged, the erasure of your data;

d) obtaining the limitation of the processing or objecting to it, when possible;

e) requesting the portability of the data you have provided to the Data Controller, i.e. their receipt in a structured, commonly used and machine readable format, and to transmit such data to another Data Controller, without any impediment by the Data Controller itself.

You may also lodge a complaint with the Personal Data Protection Guarantor pursuant to Article 77 of the GDPR.

To exercise these rights, simply contact the Data Controller by writing to the e-mail address: info@tinexta.com.

The person in charge of keeping the Insider Register.

***

The undersigned hereby declares that s/he is aware of the obligations envisaged by the EU and national provisions applicable from time to time on the processing of Relevant Information and Inside Information and has received adequate information, as well as a full copy of the Company's Procedure, and accepts the content thereof, undertaking to comply with its requirements.

To mark acceptance and acknowledgement of the Procedure.

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Scheme 3

Deletion from the Insider Register

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the register of persons with access to Inside Information pursuant to Article 7 of the MAR (the "**Insider Register**").

Following what has already been communicated to you on [●] with reference to your inclusion in the Insider Register, we hereby inform you that on [●] the reason for your inclusion in the Insider Register no longer exists.

Your personal data subject to processing (e.g. forename, surname, tax code, company to which you belong, reason for enrolment in the Insider Register) will be deleted after five years from the date of deletion.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Yours faithfully,

_____

ANNEX 'E' RIL
COMMUNICATIONS
TEMPLATE

Scheme 1

Notification of inclusion in the RIL and information on the processing of personal data of parties entered in the list of persons with access to Relevant Information

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the list of persons with access to relevant information, as defined in the Procedure (the "**RIL**").

We hereby inform you that your personal data have been included in said RIL for the reason communicated to you by e-mail.

It should be noted that holders of Relevant information pertaining to the Company, for the purposes of its dissemination, must comply with the provisions contained in the Procedure for the management and external disclosure of Confidential, Relevant and Inside Information (the "**Procedure**"), which is attached hereto, also available at the websitewww.tinexta.com.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Please send a copy of this communication, signed by way of acknowledgement and acceptance, by email to the following addresses:registro.informazioni@tinexta.com and registro.tinexta@computershare.it.

* * *

We wish to inform you that the personal data necessary for registration in the RIL and for the related updates will be processed and stored by the Company, with the help of electronic media, in compliance with the provisions of the Privacy Regulations (meaning Italian privacy legislation, European Regulation 2016/679 - GDPR - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and the provisions of the Privacy Guarantor on personal data protection), in order to fulfil the obligations deriving from current legislation on market abuse and the processing of Inside Information and for the period required by the aforementioned legislation. We inform you that this data processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. The communication of the personal data requested is therefore mandatory; the data may be communicated for the same purposes to the competent authorities, to companies that provide services to the Company, which will act as Data Controllers or Processors, in the latter case upon appointment. Failure to grant them could expose you and/or Tinexta S.p.A. to possible sanctions pursuant to the regulations in force and/or the Procedure.

Lastly, we hereby inform you that the Data Controller in question is Tinexta S.p.A., with registered office in Rome, Piazzale Flaminio no. 1/B; e-mail: info@Tinexta.com.

We hereby inform you that you may exercise the rights accorded to you by the applicable legislation at any time, including:

a) accessing your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes;

b) obtaining the immediate rectification of inaccurate personal data concerning you;

c) obtaining, in the cases envisaged, the erasure of your data;

d) obtaining the limitation of the processing or objecting to it, when possible;

e) requesting the portability of the data you have provided to the Data Controller, i.e. their receipt in a structured, commonly used and machine readable format, and to transmit such data to another Data Controller, without any impediment by the Data Controller itself.

You may also lodge a complaint with the Personal Data Protection Guarantor pursuant to Article 77 of the GDPR.

To exercise these rights, simply contact the Data Controller by writing to the e-mail address: info@tinexta.com.

The person in charge of keeping the RIL.

***

The undersigned hereby declares that s/he is aware of the obligations envisaged by the EU and national provisions applicable from time to time on the processing of Relevant Information and Inside Information and has received adequate information, as well as a full copy of the Company's Procedure, and accepts the content thereof, undertaking to comply with its requirements.

To mark acceptance and acknowledgement of the Procedure.

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Scheme 2

Update of data entered in the RIL

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the list of persons with access to relevant information, as defined in the Procedure (the "**RIL**").

Following what has already been communicated to you on [●] with reference to your inclusion in the RIL, you are hereby informed that following [●], the reason for your inclusion in the RIL has been updated.

It should be noted that holders of Relevant Information or Inside Information pertaining to the Company, for the purposes of its dissemination, must comply with the provisions contained in the Procedure for the management and external disclosure of Confidential, Relevant and Inside Information (the "**Procedure** "), which is attached hereto and also available on the websitewww.tinexta.com.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Please send a copy of this communication, signed by way of acknowledgement and acceptance, by e-mail to the following addresses: registro.informazioni@tinexta.com and registro.tinexta@computershare.it.

* * *

We wish to inform you that the personal data necessary for registration in the RIL and for the related updates will be processed and stored by the Company, with the help of electronic media, in compliance with the provisions of the Privacy Regulations (meaning Italian privacy legislation, European Regulation 2016/679 - GDPR - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and the provisions of the Privacy Guarantor on personal data protection), in order to fulfil the obligations deriving from current legislation on market abuse and the processing of Inside Information and for the period required by the aforementioned legislation. We inform you that this data processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. The communication of the personal data requested is therefore mandatory; the data may be communicated for the same purposes to the competent authorities, to companies that provide services to the Company, which will act as Data Controllers or Processors, in the latter case upon appointment. Failure to grant them could expose you and/or Tinexta S.p.A. to possible sanctions pursuant to the regulations in force and/or the Procedure.

Lastly, we hereby inform you that the Data Controller in question is Tinexta S.p.A., with registered office in Rome, Piazza Flaminio no. 1/B; e- mail: info@Tinexta.com.

We hereby inform you that you may exercise the rights accorded to you by the applicable legislation at any time, including:

a) accessing your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes;

b) obtaining the immediate rectification of inaccurate personal data concerning you;

c) obtaining, in the cases envisaged, the erasure of your data;

d) obtaining the limitation of the processing or objecting to it, when possible;

e) requesting the portability of the data you have provided to the Data Controller, i.e. their receipt in a structured, commonly used and machine readable format, and to transmit such data to another Data Controller, without any impediment by the Data Controller itself.

You may also lodge a complaint with the Personal Data Protection Guarantor pursuant to Article 77 of the GDPR.

To exercise these rights, simply contact the Data Controller by writing to the e-mail address: info@tinexta.com.

The person in charge of keeping the RIL.

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The undersigned hereby declares that s/he is aware of the obligations envisaged by the EU and national provisions applicable from time to time on the processing of Relevant Information and Inside Information and has received adequate information, as well as a full copy of the Company's Procedure, and accepts the content thereof, undertaking to comply with its requirements.

To mark acceptance and acknowledgement of the Procedure.

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Scheme 3

Deletion from the RIL

The undersigned Tinexta S.p.A. ("**Company**" or "**Data Controller**"), in compliance with the provisions of the procedure for the management of the registers of persons with access to Inside Information and Relevant Information, has established the list of persons with access to relevant information, as defined in the Procedure (the "**RIL**").

Following what has already been communicated to you on [●] with reference to your inclusion in the RIL, you are hereby informed that the reason for your inclusion in the RIL as at [●] no longer exists.

Your personal data subject to processing (e.g. forename, surname, tax code, company to which you belong, reason for enrolment in the Insider Register) will be deleted after five years from the date of deletion.

Should you require any clarifications, please contact the Investor Relator of the Company, as indicated from time to time on the company's website, in the Investor Relations section.

Yours faithfully,

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