

**ITALMOBILIARE Società per Azioni**

**Procedure relating to the  
register of persons with access  
to inside information**  
(Insider List Procedure)

*July 31, 2018*

## **CONTENTS**

### **Introduction**

**1) Purpose and scope of the register**

**2) Data management procedures**

**3) Record keeper**

**4) Recipients**

**5) Inclusion in the register**

**6) Updating the register**

**7) Obligations of persons listed**

**8) Record storage**

**9) Sanctions**

**10) Amendments and Additions**

**Main legal and regulatory**

**references**

**Annexes**

**Annex 1: Occasional Section Template**

**Annex 2: Permanent Section Template**

**Annex 3: Template for notifications to the Record Keeper for inclusion in the Register**

## **Introduction**

This procedure (**Procedure**) is closely linked to the internal regulations on the management and public disclosure of inside information and the notification of transactions carried out by the Company's PDMRs involving shares (or associated financial instruments) issued by the Company.

The main legal and regulatory references, including an abstract of rules on the list of persons having access to inside information, that the Procedure Recipients, as defined below, are required to understand and apply together with the aforementioned internal regulations, are stated herein after the text of the Procedure.

For all aspects not specifically covered in this Procedure, the legal and regulatory provisions in force *pro tempore* will apply.

## Art. 1

### Purpose and scope of the register

1) This Procedure is adopted pursuant to current regulations with a view to fulfilling the obligation imposed on Italmobiliare S.p.A. (**Company** or **Italmobiliare**) to draw up a list (**Register**) of persons who, for reasons related to their duties, profession or official roles, have access to inside information pursuant to art. 7, Regulation (EU) of the Parliament and of Council Regulation No 596 of 16 April 2014 (**Regulation No 596/2014**).

2) Amongst other things, the Organisation, Management and Control Model adopted by the Company pursuant to Italian Legislative Decree 231/2001 requires the list to be drawn up also as a means of preventing the offences envisaged by the legislation on market abuse.

3) The Procedure is applied every time a Recipient, pursuant to art. 4 below, manages or has access to inside information, even on a temporary basis.

4) Pursuant to current regulations, the term “inside information” refers to all information which:

- i. is of a **precise** nature;
- ii. has **not yet been disclosed to the public**;
- iii. directly or indirectly **concerns Italmobiliare or the related financial instruments**;
- iv. could, if disclosed to the public, have a **significant effect on** the listed price of financial instruments issued by Italmobiliare or on the prices of **associated derivatives**.

5) In particular, information is considered “precise” when it refers to a set of existing circumstances or circumstances that can be reasonably considered would arise, or to an event that has already occurred or that can be reasonably considered would occur, and if such information is sufficiently specific to allow conclusions to be drawn on the potential effect of the set of circumstances or event on the prices of financial instruments, the related derivative or the related spot commodity contracts. In this respect, for a protracted process that is intended to finalise or result in a particular circumstance or future event, such a circumstance or future event, as well as the intermediate steps of the process that are associated with the finalisation or determination of the circumstance or future events, can be considered information of a precise nature (1).

---

(1) Pursuant to Recital no. 16 of Regulation (EU) No 596/2014: “Where inside information concerns a process which occurs in stages, each stage of the process as well as the overall process could constitute inside information. An intermediate step in a protracted process may in itself constitute a set of circumstances or an event which exists or where there is a realistic prospect that they will come into existence or occur, on the basis of an overall assessment of the factors existing at the relevant time. However, that notion should not be interpreted as meaning that the magnitude of the effect of that set of circumstances or that event on the prices of the financial instruments concerned must be taken into consideration”. Recital no. 17 of Regulation (EU) No 596/2014 states: “Information which relates to an event or set of circumstances which is an intermediate step in a protracted process may relate, for example, to the state of contract negotiations, terms provisionally agreed in contract negotiations, the possibility of the placement of financial instruments, conditions under which financial instruments will be marketed, provisional terms for the placement of financial instruments, or the consideration of the inclusion of a financial instrument in a major index or the deletion of a financial instrument from such an index”.

An intermediate step in a protracted process is therefore considered inside information if it meets the aforementioned criteria.

Information which, if disclosed to the public, would probably have a significant effect on the prices of financial instruments or derivatives, or on related spot commodity contracts, is considered to be information that a rational investor would probably use as an element on which to base his investment decisions.

6) The information ceases to be considered “inside information” once it is disclosed to the public in compliance with current legal and regulatory provisions, and in compliance with the principle of fair disclosure.

7) For further details on the concept of inside information and rules applying to the handling of this type of information, reference should be made to the “*Procedure for the management of confidential and inside information*”.

## **Art. 2**

### **Data management procedures**

1) The Company establishes and maintains the Register in accordance with management procedures that ensure easy viewing and extraction of its data, accuracy and non-editability of the data, traceability of access, to allow subsequent verification and the ability to obtain previous versions, also adopting suitable data security, integrity and confidentiality procedures.

All persons who, for reasons related to their operational or professional activities, or their official roles, have access to inside information, are entered in the Register.

2) The Register is kept electronically and access to it is permitted only to the Record Keeper referred to in art. 3 below, with the cooperation of the employees in the Corporate Affairs Department of Italmobiliare.

3) The Register is divided into separate sections (the “**Occasional Sections**”), one for each specific form of inside information, structured according to the criteria stated in Annex 1 to this Procedure.

Every time a new form of inside information is identified, a new section is added to the Register.

Each section of the Register contains only the data of persons with access to the inside information contemplated in that specific section.

4) The Company also reserves the right to arrange and update a supplementary section of the Register, structured in accordance with criteria indicated in Annex 2 to this Procedure.

---

In this section (the “**Permanent Access Section**”), persons are entered who, for reasons related to their operational or professional activities, or their official roles, have continuous and systematic access to the Company’s inside information.

- 5) The Register is structured in such a way as to contain at least the following information:
- a) date and time of creation of the Register section, i.e. identification of the inside information;
  - b) description of the specific inside information;
  - c) date and time of the last update;
  - d) date of transmission to the competent authority;
  - e) identification details of the registered person:
    - if a *natural person*: name, surname (surname at birth if different), tax code (or other national ID number if a foreign national), place and date of birth, full home address (street name and number, city, postcode and country), office phone numbers (direct landline and mobile numbers used for professional purposes), personal phone numbers (home and personal mobile phone), e-mail address;
    - if a *company or other legal entity, body or professional association*: the details entered are those of the natural persons who the Company believes have access to the inside information (as specified above);
  - f) corporate office or responsibility in the organisation held by the person registered or the department in which he/she works within the Company or legal entity;
  - g) reason for registration;
  - h) date and time when the person entered in the Register gained access to the inside information (2);
  - i) date and time when the person ceased to have access to the inside information (3).

6) The Register is updated by adding the information and data transmitted to the Record Keeper in accordance with this Procedure, or information and data of which he has become directly aware.

7) If the Company has decided to delay disclosure to the public of the inside information, as envisaged in the specific paragraph of the “*Procedure on the management of confidential and inside information*” (4), the Record Keeper must be notified of the information relating to the delay.

8) The task of keeping the Register can be assigned to another person acting on behalf of the Company, provided that internal policy on the dissemination and monitoring of inside information allows the appointed person to promptly comply with all related obligations.

---

(2) Information not required for registration in the Permanent Access Section (the date and time of the person’s inclusion in that Section must be stated).

(3) Information not required for registration in the Permanent Access Section.

(4) See paragraph “*Delayed disclosure of inside information to the public*”.

The Company in any event retains responsibility for the correct fulfilment of obligations imposed by current regulations, and also retains the right to access the Register at any time.

9) The Register is transmitted to CONSOB, at their request, via certified e-mail to [consob@pec.consob.it](mailto:consob@pec.consob.it).

### **Art. 3**

#### **Record Keeper**

1) The keeping and updating of the Register are the responsibility of the **Record Keeper**, who must adopt all suitable measures to guarantee the accuracy and confidentiality of the information and data it contains.

2) The Record Keeper is the Head of Corporate Affairs of Italmobiliare, who avails himself for this purpose of the staff employed by the Corporate Affairs Department.

3) All communications between the Record Keeper and persons entered in the Register is by e-mail generated by the register management software, or using the Record Keeper's address, or the address [affarisocietari@italmobiliare.it](mailto:affarisocietari@italmobiliare.it) and adopting all necessary precautions to avoid such communications being read by unauthorised third parties.

If a person entered in the Register does not have a personal e-mail address, or in other circumstances to be assessed by the Record Keeper, communications with that person can be in a different format, provided special envelopes or closed parcels are used and delivery is made in such a way as to ensure proof of receipt.

4) The Record Keeper maintains evidence of the criteria adopted in keeping the Register, the management procedures and search procedures for the data it contains, and the information received from registered persons listed, in such a way as to guarantee easy viewing and extraction, as well as relations with the persons listed and with the Supervisory Authorities.

5) The Record Keeper must promptly inform the Supervisory Body of the Company of any action, event or omission that may constitute an offence or in any event a violation of this Procedure, in addition to sending any information the Supervisory Body may request as part of its supervisory activities.

### **Art. 4**

#### **Recipients**

1) The following can be included in the Register where it is considered that they have access to inside information regarding the activities of the Company or its subsidiaries, or the related financial instruments:

- a) members of the Board of Directors and Board of Statutory Auditors of Italmobiliare;
- b) persons who, as a result of their duties, are directly answerable to one of the persons referred to in point a), and are managers of the organisational unit where the inside information originates and/or is managed;
- c) subject to prior written notification from one of the persons indicated in point b), employees individually identified from that same organisational unit;

- d) any third party as a result of their operational or professional duties or official role performed on behalf of the Company, following written notification from one of the persons indicated in point b);
- e) the Chairman, the Deputy Chairman (if any and if with operating powers), the CEO, all other directors assigned operating powers, the General Manager (if any), as well as all other senior managers and employees of the main subsidiaries that generated the inside information.

## **Art. 5**

### **Registration in the register**

1) The Record Keeper is required to promptly enter in the Register all persons who manage or have access to inside information.

2) Registration takes place by the following methods:

a) in the **Permanent Access Section**, if established, all persons with continuous and systematic access to all inside information regarding the Company are entered by the Record Keeper, after consulting the CEO.

b) all persons with access to the specific inside information referred to in the individual **Occasional Sections** must be included in the list relating to that specific inside information. When a qualifying event occurs, on the basis of internal regulations, such as inside information or information likely to generate inside information, the Record Keeper creates a specific list in the Register for that inside information.

The registration of persons in an individual list in the Register is performed by the Record Keeper at the request of the CEO - General Manager, or of the Managers/Heads of the company departments involved in the activity/event in the context of which the specific inside information was generated. For this purpose, the aforementioned persons may make use of the main contact for the activity or transaction, who then notifies the Record Keeper of the persons to be registered.

The notifications (5) take place by sending an email to the addresses stated in art. 3, subsection 3, containing the information referred to in the Template attached in Annex 3 of this procedure.

---

(5) All notifications to and from the Record Keeper must be handled with maximum care and confidentiality, in compliance with the rules stated in the *"Procedure for the internal management and public disclosure of inside information"*.



If a request does not contain all the necessary data, the Record Keeper must ask for the missing data to be sent to him promptly. The Record Keeper can, however, enter the person in the Register if the information is in any event sufficient to identify the person and can issue the notification confirming entry. In such cases he will still be required to complete the Register entry with the missing data as soon as it is received.

The Record Keeper periodically asks the CEO, Managers of the company departments and/or the contact, if appointed, whether updates to the Register lists and/or entries are necessary.

3) The data entered in the Register is based on information provided by the persons entered. Such persons are responsible for the accuracy of the data. The data will be processed in accordance with the regulations on personal data processing.

4) The Record Keeper will promptly enter data in the Register and immediately notify the person concerned of the following, by e-mail or in any other format, provided proof of receipt is guaranteed:

- a) **completed registration** in the Register;
- b) the **obligations** deriving from having access to Inside Information;
- c) the **sanctions** envisaged in cases of market abuse.

The Record Keeper also informs the Persons already entered in the Register (i) of any updates that relate to them, and (ii) their possible removal from the Register.

5) The Record Keeper also takes all reasonable measures to ensure that all persons included in the Register confirm in writing their awareness of the legal and regulatory obligations associated with the entry and of the sanctions applicable in the event of insider dealing.

For this purpose the person receiving the notification must return a copy to the Record Keeper, duly dated and signed to acknowledge receipt and understanding of the notification from the Company through the electronic procedure provided in the Register management software. The notification of acknowledgement must be sent by email to the addresses stated in article 3, subsection 3, or delivered by hand to the Record Keeper in such a way as to ensure its confidentiality.

In the event of a failure to send the acknowledgement, the registered subject must in any case be considered to be aware of the obligations connected to the registration in the Register and any applicable sanctions. The Record Keeper will in any case issue reminders for this notification to be sent.

## **Art. 6**

### **Updating the register**

1) The Company ensures that the Register is updated, entering the date and time of the update, when:

- there is a change in the reasons for inclusion of a person already entered in the Register, or in any of the details previously provided at the time of registration (6);
- it is necessary to add a new person with access to inside information;

- a person no longer has access to such information (7).
- 2) Updating of the Register, including the deletion of information and data already entered, is carried out without delay by the Record Keeper:
- a) on his own initiative when:
- there has been a change in corporate officers of the Company or in the senior management positions of one or more organisational units;
  - the inside information has been disclosed to the public in compliance with current legal and regulatory provisions, when the persons listed in the Register as managers or with access to the inside information disclosed are deleted;
- b) at the request of the CEO or individuals pursuant to art. 4, letter b), to be performed by the methods required for initial entry in the Register.
- 3) Each update must state the date and time of the change that made updating necessary.

**Art. 7**  
**Obligations of persons**  
**entered in the register**

- 1) In addition to the provisions of rules governing the relations between each Recipient and the Company, every person listed in the Register is obliged to maintain confidentiality of all the inside information handled or to which he/she has access until such a time as it is disclosed to the public in compliance with current legal and regulatory provisions and in compliance with the principle of fair disclosure.
- 2) Persons listed in the Register are prohibited from:
- **insider dealing or attempted insider dealing;**
  - **recommending insider dealing by others** or encouraging insider dealing by others;
  - **unlawfully disclosing** the inside information.

**Art. 8**  
**Record storage**

- 1) All data relating to the persons entered in the Register, and likewise all support documentation sent and received by the Record Keeper, must be stored for at least five

---

(6) After the update, the Record Keeper arranges for the person listed to be notified. The person in question must then issue the related acknowledgement.

(7) After closing the entry, the Record Keeper informs the person that their entry in the Register has been deleted.

years after removal of the circumstances that led to the entry or update.

**Art. 9**  
**Sanctions**

1) In the event of failure to comply with this Procedure, the disciplinary and sanctioning measures included in the Organisation, Management and Control Model adopted by the Company will apply.

**Art. 10**  
**Amendments and additions**

Any amendments and/or additions to this Procedure must be approved by the Board of Directors, except for amendments triggered by changes to current regulations or by changes in the organisation and market practices, which call for immediate application and are not open to discretionary implementation, and which can therefore be applied by the Chief Executive Officer with immediate effect and later submitted to the Board of Directors for approval at the next available board meeting.

## **Main legal and regulatory references**

Regulation (EU) No 596 of the European Parliament and of the Council of 16 April 2014 on market abuse, which repeals European Parliament and Council Directive 2003/6/EC and the European Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC, art. 18 (**Regulation (EU) No 596/2014**)

Commission Implementing Regulation (EU) 2016/347 of 10 March 2016 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014 (**Regulation (EU) No 347/2016**)

Italian Legislative Decree 58 of 24 February 1998, “Consolidated Law on Finance” (**TUF**) (8)

Issuers’ Regulation containing the TUF implementing rules, adopted by CONSOB by resolution 11971 of 24 May 1999, as amended (**IR**)

Italian Legislative Decree 231 of 8 June 2001, “Provisions on the administrative liability of legal entities, companies and associations with or without legal status, pursuant to art. 11, Italian Law 300 of 29 September 2000” (**Italian Legislative Decree 231/2001**)

Consob communication 0061330 of 1 July 2016 on the methods for reporting to CONSOB the information required by Regulation (EU) No 596/2014

---

(8) The European Regulations indicated apply directly throughout the European Union and form part of the context of pre-existing provisions (legal or regulatory) contained in national laws, even if not formally adapted or amended.

**REGULATION (EU) No 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 16 APRIL 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC**

**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 subsection 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 exempt from drawing up an insider list, provided that the following conditions are met:

- a) the issuer takes all reasonable steps to ensure that any person with access to inside information acknowledges the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information; and
- b) the issuer is able to provide the competent authority, upon request, with an insider list.

**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.** Subsections 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.

**COMMISSION IMPLEMENTING REGULATION (EU) 2016/347 OF 10 MARCH 2016 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014**

main recitals:

(1) Pursuant to Article 18 of Regulation (EU) No 596/2014, issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor, or any other persons acting on their behalf or on their account are required to draw up insider lists and keep them up to date in accordance with a precise format.

(2) The establishment of a precise format, including the use of standard templates, should facilitate the uniform application of the requirement to draw up and update insider lists laid down in Regulation (EU) No 596/2014. It should also ensure that competent authorities are provided with the information necessary to fulfil the task of protecting the integrity of the financial markets and investigate possible market abuse.

(3) Since multiple pieces of inside information can exist within an entity at the same time, insider lists should precisely identify the specific pieces of inside information to which persons working for issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor have had access to (whether it is, inter alia, a deal, a project, a corporate or a financial event, publication of financial statements or profit warnings). To that end, the insider list should be divided into sections with a separate section for each piece of inside information. Each section should list all persons having access to the same specific piece of inside information.

(4) To avoid multiple entries in respect of the same individuals in different sections of the insider lists, the issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor, or the persons acting on their behalf or on their account, may decide to draw up and keep up to date a supplementary section of the insider list, referred to as the permanent insiders section, which is of a different nature to the rest of sections of the insider list, as it is not created upon the existence of a specific piece of inside information. In such a case, the permanent insiders section should only include those persons who, due to the nature of their function or position, have access at all times to all inside information within the issuer, the emission allowance market participant, the auction platform, the auctioneer or the auction monitor.

(5) The insider list should in principle contain personal data that facilitates the identification of the insiders. Such information should include the date of birth, the personal address and, where applicable, the national identification number of the individuals concerned.

(6) The insider list should also contain data that may assist the competent authorities in the conduct of investigations, to rapidly analyse the trading behaviour of insiders, to establish connections between insiders and persons involved in suspicious trading, and to identify contacts between them at critical times.

In this respect, telephone numbers are essential as they permit the competent authority (11.3.2016 Law 65/49, Official Journal of the European Union IT (1), Official Gazette, Law 173 of 12.6.2014, page 1) to act swiftly and to request data traffic records, if necessary. Moreover, such data should be provided at the outset, so that the integrity of the investigation is not compromised by the competent authority having to revert in the course of an investigation to the issuer, the emission allowance market participant, the auction platform, the auctioneer, the auction monitor or the insider with further requests for information.

(7) To ensure that the insider list can be made available to the competent authority as soon as possible upon request and in order not to endanger an investigation by having to seek information from the persons in the insider list, the insider list should be drawn up in electronic format and updated at all times without delay when any of the circumstances specified in Regulation (EU) No 596/2014 for the updating of the insider list occurs.

(8) The use of specific electronic formats for the submission of insider lists as determined by competent authorities should also decrease the administrative burden for competent authorities, issuers, emission allowance market participants, auction platforms, auctioneers or auction monitor and those acting on their behalf or on their account. The electronic formats should allow for the information included in the insider list to be kept confidential and for the rules laid down in Union legislation on the processing of personal data and the transfer of such data to be complied with.



## Article 2

### Format for drawing up and updating the insider list

**1.** Issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor, or any person acting on their behalf or on their account, shall ensure that their insider list is divided into separate sections relating to different inside information. New sections shall be added to the insider list upon the identification of new inside information, as defined in Article 7 of Regulation (EU) No 596/2014.

Each section of the insider list shall only include details of individuals having access to the inside information relevant to that section.

**2.** The persons referred to in subsection 1 may insert a supplementary section into their insider list with the details of individuals who have access at all times to all inside information ('permanent insiders').

The details of permanent insiders included in the supplementary section referred to in the first subparagraph shall not be included in the other sections of the insider list referred to in subsection 1.

**3.** The persons referred to in subsection 1 shall draw up and keep the insider list up to date in an electronic format in accordance with Template 1 of Annex I.

Where the insider list contains the supplementary section referred to in subsection 2, the persons referred to in subsection 1 shall draw up and keep that section updated in an electronic format in accordance with Template 2 of Annex I.

**4.** The electronic formats referred to in subsection 3 shall at all times ensure:

- a) the confidentiality of the information included by ensuring that access to the insider list is restricted to clearly identified persons from within the issuer, emission allowance market participant, auction platform, auctioneer and auction monitor, or any person acting on their behalf or on their account that need that access due to the nature of their function or position;
- b) the accuracy of the information contained in the insider list;
- c) the access to and the retrieval of previous versions of the insider list.

**5.** The insider list referred to in subsection 3 shall be submitted using the electronic means specified by the competent authority. Competent authorities shall publish on their website the electronic means to be used. Those electronic means shall ensure that completeness, integrity and confidentiality of the information are maintained during the transmission.

# Annex 1

## 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 this 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	Sur-name(s) of the insider	Birth sur-name(s) of the insider (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Obtained (the date and time at which a person obtained access to inside information)	Ceased (the date and time at which a person ceased to have access to inside information)	Date of birth	National-Identification-Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address: street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[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 space)]	[Text: detailed personal address of the insider — Street name and street number — City — Post/zip code — Country]

## 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	Birth surname(s) of the insider (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which a person was included in the permanent insider section)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address (street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numbers (no space)]	[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: detailed personal address of the insider — Street name and number — City — Post/zip code — Country]

## Annex 3

### Template for the insider list to be submitted by issuers of financial instruments admitted to trading on SME growth markets

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

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

<b>First name(s)</b> of the insider	<b>Sur-name(s)</b> of the insider	<b>Birth sur-name(s)</b> of the insider (if different)	<b>Professional telephone number(s)</b> (work direct telephone line and work mobile numbers)	<b>Company name and address</b>	<b>Function and reason for being insider</b>	<b>Obtained</b> (the date and time at which a person obtained access to inside information)	<b>Ceased</b> (the date and time at which a person ceased to have access to inside information)	<b>National Identification Number</b> (if applicable) Or otherwise date of birth	<b>Personal full home address</b> (street name; street number; city; post/zip code; country) (If available at the time of the request by the competent authority)	<b>Personal telephone numbers</b> (home and personal mobile telephone numbers) (If available at the time of the request by the competent authority)
[Text]	[Text]	[Text]	[Numbers (no space)]	[Address of issuer 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]	[Number and/or text or yyyy-mm-dd for the date of birth]	[Text: detailed personal address of the insider — Street name and number — City — Post/zip code — Country]	[Numbers (no space)]