



INTERNAL DEALING PROCEDURE

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Premise

The COIMA RES SIIQ SpA's Board of Directors (hereinafter "COIMA RES" or the "Company") has adopted this procedure to define the principles and rules on market abuse which govern the operation of the Company's shares, on debt instruments issued by it as well as on derivatives or other part of certain financial instruments (as defined below) persons who hold a senior position or persons closely associated with them (the "Internal Dealing Procedure" or the procedure ").

Normative requirements

- Commission Regulation (EU) No. 596/2014 (on the "MAR" Regulation);
- Commission Delegated Regulation (EU) No. 522/2016 (the "Delegated Regulation (EU) 522/2016");
- Implementing Regulation (EU) No. 523/2016 (the "Implementing Regulation (EU) 523/2016");
- February 24, 1998. 58 - Consolidated Law on Financial Intermediation, as amended (the "TUF"); is
- Consob Regulation no. 11971/99, as amended, (the "Issuers Regulation").

The Internal Dealing procedure was adopted in respect of normative references listed above (collectively, the "Relevant Statement").

1. SCOPE OF

The procedure is directed to identify transactions involving:

- (i) equity or debt instruments issued by the Company, as well as derivatives or other financial instruments - as defined in Article 4, paragraph 1, point 15 of Directive (EC) 2014/65, and (a) admitted to trading on a regulated market or for which it has received a request for admission to trading on a regulated market; (B) negotiations on a MTF, admitted to trading on a MTF or for which has been submitted a request for admission of a MTF; (C) negotiations on an OTF; or (d) the price or value depends on a financial instrument under (a) - (c), which take effect on the price or value (including, without limitation, credit default swaps and contracts for difference) - connected to them in accordance with art. 3, paragraph 2, letter. b) MAR Regulation (collectively, the "Tues. Financial Instruments") performed by Tues. Relevant Persons and Persons Closely Related with Relevant Persons Tues (as defined below);
- (ii) the Company's shares and financial instruments linked to shares as defined under. 152-sexies, paragraph 1, lett. b) of the Issuers' Regulations (collectively, the "Securities RE") RE by Relevant Persons and Persons Closely Related with Relevant RE (as defined below);

An excerpt of the Relevant Legislation in force at the date of approval of the Procedure is attached [Appendix legislation].

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2. RELEVANT PERSONS

The procedure applies:

2.1 relevant persons under MAR Regulation (the "Relevant Ties") consisting of:

2.1.1 Relevant Persons under MAR Regulation (hereinafter "Relevant Ties"):

- (i) the components of the Company's Board of Directors (executive and non-executive) and Statutory Auditors of the Company;
- (ii) senior management of the Company who, although not members of which literally means (i) above, have regular access to privileged information and have the power to adopt, as a result of a provision also implicit powers, management decisions strategy that may affect the future development and prospects of the Company; is

2.1.2 persons closely associated with Relevant Persons Ties (the "**Closely Related to Relevant Persons Ties.**"):


- (i) the spouse not legally separated or a partner as a spouse under the current regulations, children, including those of the spouse, dependent, and, if cohabiting for at least one year, parents, relatives and in-laws of Relevant to MAR; is
- (ii) legal persons, trusts and partnerships: (a) whose managerial responsibilities are covered by a Relevant Ties or a person listed in (i) above, or (b) directly or indirectly controlled by such person or (c) both up for the benefit, or (d) whose economic interests are substantially equivalent to those of such person.

2.2 relevant persons in accordance with the Issuer Regulations (hereinafter "Relevant Persons RE") consisting of:

2.2.1 Relevant Persons pursuant to the Issuer Regulations (hereinafter "**Subjects Relevant RE**"): anyone who holds a holding, calculated pursuant to Article 118 of the Issuer Regulation, at least 10% of the Company's share capital, represented by shares with voting rights, and any other person that controls the Company;

2.2.2 Persons closely associated with Relevant RE (the "**Closely Related to Relevant Persons RE**"):

- (i) the spouse not legally separated or a partner as a spouse under the legislation in force, the children, including the spouse, dependents, and, if cohabiting for at least one year, parents, relatives and in-laws of Relevant RE;
- (ii) legal persons, companies and trusts in which a Relevant RE or a person listed in the preceding paragraph (i) holds, either alone or in combination with each other, the management function;
- (iii) legal entities controlled directly or indirectly by a Relevant RE or one of the persons referred to in paragraph (i);

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- (iv) the people whose economic interests are substantially equivalent to those of a Relevant RE or one of the previous point indicated persons (i); is
- (v) Trusts established for the benefit of the RE Relevant Person or one of the persons indicated in the previous point (s).

3. TRANSACTIONS SUBJECT TO REPORTING OBLIGATIONS

3.1 Significant Transactions Tues.

3.1.1. The Relevant to MAR and Persons Closely Related with Relevant Persons Tues must communicate and publish the terms and in the manner described in paragraph [5.1], the transactions involving the Securities March - as identified by way of example the art. 19, paragraph 7 MAR Regulations and art. 10 Delegate Commission Regulation (EU) 522/2016 - we have carried out (the "Relevant Transactions MAR").

3.1.2. They are not subject to the notification obligation:

- (i) Relevant Transactions mar whose total amount does not reach Euro 20,000.00 (twenty thousand) in a calendar year, taking into account, for the purpose of calculation of this threshold of significance, of all transactions relating to Financial Instruments MAR, carried out for each account Relevant person MAR, carried out during the last twelve months from the date of the last operation. After each communication is not communicated MAR significant transactions whose total amount does not reach a value of more € 20,000.00 (twenty thousand) within the calendar year;
- (ii) transactions relating to financial instruments linked to shares or debt instruments of the Company if, at the time of the transaction, it meets one of the following conditions:
 - a) the financial instrument consists of a share or an action of a collective investment scheme in which the exposure to the shares or to the Company's debt instruments shall not exceed 20% of the assets held by the collective investment;
 - b) the financial instrument provides exposure to a portfolio of assets in which the exposure to the shares or to the Company's debt instruments shall not exceed 20% of portfolio assets; or
 - c) the financial instrument consists of a share or an action of a collective investment scheme or provides exposure to a portfolio of assets and the Relevant Person Tues does not know, or could know, investment composition or exposure of this the collective investment scheme or portfolio of assets in relation to the shares or to the Company's debt instruments, and also there are no grounds for doubting that person to believe that the actions or of the Company's debt instruments exceed the thresholds referred to in point a or b.

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3.2 Relevant Transactions RE

3.2.1 The RE Relevant Persons must communicate and publish the terms and in the manner described in paragraph [5.2], the transactions involving the purchase, sale, subscription or exchange of Securities RE carried out by them and / or by Closely Related with Relevant RE ("Significant Transactions RE").

3.2.2 They are not subject to the notification obligation:

- (i) Relevant Transactions RE whose total amount is the equivalent of € 20,000 (twenty thousand) in a calendar year; after each communication must not be communicated Relevant Transactions RE whose total amount does not reach a value of more € 20,000 (twenty thousand) within the calendar year; for financial derivatives, the amount is calculated with reference to the underlying shares;
- (ii) Relevant Transactions between a RE Relevant Persons and Persons Closely Related with Relevant RE;
- (iii) RE Relevant Transactions made by the Company and its subsidiaries;
- (iv) RE Relevant Transactions carried out by a credit institution or an investment firm which contribute to portfolio construction negotiation of such an entity or enterprise, as defined in Article 4, paragraph 1, point 86, of Regulation (EU) No. 575/2013, provided that the same subject:
 - takes organizationally separated from the treasury and from structures that manage strategic investments, trading and market-making structures;
 - d) is able to identify the shares held for the purpose of trading and / or market making, using methods that can be subject to verification by Consob, or by holding the same in a special separate account;

and, when it is acting as a market maker:

- e) It is authorized by its home Member State under Directive 2004/39 / EC to the conduct of market making;
- f) Consob to provide market making agreement with the market management company and / or the Company may be required by law and its implementing provisions in force in the EU Member State where the market maker does business; is
- g) notify Consob that it intends to carry out or carries out market making on the shares of the Company; the market maker should also notify Consob without delay the termination of market making on the shares.

3.2.3 In addition the requirements under Article 114, paragraph 7, of the TUF and by the Procedure for Significant Transactions RE do not apply if the Relevant Persons RE are also Relevant Persons to MAR and are already required to notify the operations carried out pursuant to MAR.

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4. RESPONSIBLE PERSON

4.1 The person responsible for receiving, managing and disclosing information to the market regarding the Transactions Relevant to MAR and - where the Company has been appointed by the Significant RE - the Relevant Transactions RE is identified in the person of Chief Financial Officer (the "Code Administrator"), which may delegate one or more subjects who will have to fulfil the requirements laid down by this procedure.

4.2 In carrying out its function, the Supervisor will make use of the Company's personal collaboration identified and designated purpose.

4.3 The Code Administrator, its employees and possible substitutes are required to maintain strict confidentiality regarding the information received pursuant to the procedure, until the disclosure to the market.

4.4 It is the responsibility of the Person in Charge:

- t) keep the list of Relevant to MAR and of Relevant RE taking care to ensure that the given information on the contents of the procedure and the obligations and prohibitions connected and that they sign the "Declaration of full knowledge and acceptance of the procedure internal dealing" attached to this sub procedure [D];
- b) provide assistance to the relevant persons to MAR and with Relevant Persons RE so that they will be communicated to the Company within the terms and in the manner determined by the Procedure;
- c) provide for the receipt of the information on Material Transactions to MAR and the Relevant Transactions RE and provide for the disclosure of the communications market to MAR and Significant Transactions - where the Company has been appointed by the Significant RE - RE of Significant Transactions in the terms established by the Procedure;
- d) supervising the preservation of communications on Significant Transactions to MAR and the Relevant Transactions RE, and those disclosed to the market;
- is) monitor the application of the procedure, in relation to the evolution of the legislation and regulations from time to time in force, as well as in relation to organizational changes and operational management.

4.5 The tasks set out in letters "a)" through "e)" above may be also treated by executive employees of the Company for this purpose identified and instructed by the Supervisor.

5. BEHAVIOR OF OBLIGATIONS AND INFORMATION

5.1 Communication Mode of Significant Transactions Tues.

5.1.1 Relevant Persons MAR is required to state all MAR Relevant Transactions carried out by them:

(the) Consob within the third open market day following the date of the Relevant MAR, by sending the attached template to the procedure as Annex [1];

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- (li) a Company no later than [8:00] the third trading day following the date of the Relevant MAR, by submitting the aforementioned document to the Appointed Person.

The Company has received the communications referred to in the previous paragraph by Relevant Persons MAR, it will proceed to communicate to the public Relevant Transactions Tues communicated by them by the third trading day following the date of the same.

5.2 Methods of communication of Relevant Operations RE


5.2.1 The Relevant RE are required to report all significant operations carried out by the same RE and / or Persons closely associated with Relevant Persons RE:

- (the) Consob by the end of the fifteenth day of the month following that in which Relevant RE has been carried out the operation, by sending the attached template to the procedure as Annex [2];
- (li) to the public by the end of the fifteenth day of the month following that in which the operation, by sending the model was carried out as Annex attached to Procedure [2];
- (lii) if the RE Relevant Persons and / or Persons Closely Related to Relevant Subjects RE intends to make use of the option referred to in paragraph [5.2.2], The company by the end of the tenth day of the month following that in which it was made the Relevant Operation RE, by submitting the aforementioned document to the Person in Charge;

5.2.2 The Relevant RE may use the Company for making the notification to Consob and to the public in the manner provided by law and / or by Consob by forwarding to the appropriate Company's request according to the specimen attached to the Procedure as Annex [2] , provided that such relevant RE has informed the Company Material Transactions RE (made by the same and / or by persons closely related to the same) and all the related information required by Annex [2] by the end of the tenth day of the month following that in which the transaction was effected.

5.2.3 Where the Relevant RE has instructed the Company to carry on its own communication due to Consob and to the public in accordance with Article [5.2] before and sent the Company all the information required by 'Annex [2] the Company publishes information - in the manner provided by the 65-bis of the Issuers Regulation, or in the manner from time to time established by law - by the end of the trading day following the date on which it received Relevant information from the predicted RE.

5.3 Relevant Persons Tues and Relevant RE are - and will remain in any case responsible even if they have committed under the previous article [5.2.3] - responsible exact and timely communication of information due to the Company, Consob and to the

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public and therefore they respond to the Company for any damage, also of image, that it suffered as a result of any failure to comply with their obligations.

5.4 Remain unchanged all legal requirements and regulations applicable in any case, from time to time, the Relevant Persons to MAR and Relevant Persons RE.

6. ACKNOWLEDGMENT AND ACCEPTANCE OF THE PROCEDURE BY RELEVANT PERSONS

6.1 The identification which occurred Relevant MAR, the content of the procedure, as well as the legal obligations in relation to internal dealing, came to the attention of Relevant to MAR and of Relevant RE by the Supervisor by written notice.

6.2 The Relevant Tues sign a declaration of vision and acceptance of the Procedure prepared socket according to the model described in Annex [3], also stating the commitment to make known to Persons Closely Related with Relevant Tues Subjects related to them the existence of the conditions in virtue of which the latter are subject to the reporting requirements of the Relevant Transactions MAR, and to ensure - pursuant to Article 1381 of the civil code - that Closely Related to Relevant Tues punctually fulfil these obligations;

- (the) communicate to the Company names of Closely Related to Relevant Persons Tues due to the same and undertake to update the Company about any change that intervenes in the perimeter of the same; is
- (li) notify in writing the Persons Closely Related with Relevant Persons MAR related to them, based on the model set out in 'Annex 4, the reporting requirements of the Relevant Transactions Tues owed them, preserving a copy of the relevant letter of information and by forwarding it a copy of the Company. It is understood that the provisions of the Procedure are and will be applicable to such persons regardless of the subscription by them of this declaration.

6.3 Based on the information received pursuant to the foregoing paragraph, the Code Administrator shall prepare and constantly update a list of all TUE- Relevant Persons and Persons closely associated with Relevant Persons MAR, as indicated in paragraph [4.4].

6.4 The Relevant RE sign a declaration of vision and acceptance outlet of the Procedure prepared in accordance with the model set out in Annex [4], also stating the commitment to make known the Persons Closely Related with Relevant RE related to them the existence of the conditions under which these latter are subject to the reporting requirements of the Relevant Transactions RE.

7. ADDITIONAL REQUIREMENTS OF CONDUCT ("BLACK OUT PERIODS")

7.1 It is prohibited to Relevant MAR perform on their own or on behalf of third parties - either directly or through an intermediary - MAR Significant Transactions during the 30 calendar days preceding the announcement by the Company's draft annual financial

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statements, the report Half-year financial and other periodic financial reports, whose publication is mandatory under the provisions of law (hereinafter each a "Black-Out Period).

7.2 If the Company publishes preliminary figures, the Black-Out Period applies only as of the dates of the latter and not the final ones, provided that these preliminary data include all the basic information regarding the financial data whose inclusion and envisaged in the report final.

7.3 A Relevant Sea can fulfil a Transaction Relevant Sea during a Black-Out Period provided that it is adhered to the procedure indicated in Annex [6] and all the following conditions:

- (to) it is in any of the following circumstances:
 - (the) based on a case-by-case, no exceptional conditions, such as severe financial difficulties requiring immediate sale of shares; or
 - (li) because of the trading features, in case of operations carried out simultaneously or in relation to compensation plans or shareholdings, the establishment of a guarantee, or acquisition of a right to subscribe or assignment or purchase of shares or in the event of operations in which the beneficial interest of the title in question is not subject to variations;
- (B) the Relevant Tues be able to demonstrate that the Relevant Transaction Tues. cannot be done at another time if not during the Black Out Period.


8. NON-COMPLIANCE WITH THE REQUIREMENTS OF CONDUCT AND INFORMATION UNDER THIS PROCEDURE: SANCTIONS.

8.1 The application of these sanctions by the authorities does not affect the Company damaged the possibility of compensation for any damages or loss in respect of the Relevant Persons to MAR and Relevant Persons RE.

9. PROCESSING OF PERSONAL DATA

9.1 Each Relevant Person to MAR and Relevant RE receive the privacy policy, set out in Annex [7] concerning the processing of personal data in relation to the obligations set out in this Internal Dealing Procedure, carried out through third parties for the sole purpose of complying with the legislation in the MAR regulations and the regulations issued by Consob pursuant to art. 114, paragraph 7, of the TUF; also it notes that the same information is entered, also in summary, in the financial statements, the interim financial report and the quarterly reports of COIMA RES management.

9.2 Pursuant to the regulations for the protection of personal data (Regulation (EU) 2016/679 - "GDPR"), notices of Relevant Persons to MAR and RE Relevant Persons must contain only the data necessary to meet the specific objects that the Data intended. Therefore, the same data:

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- they shall be informed, for the pertinent to the obligations, tasks and purposes previously indicated, in the first place to Consob, the Italian stock exchange, the Company and disclosed to the public;

- they are kept for the period necessary for the purposes for which they were received.

9.3 Information regarding relevant persons to MAR and Relevant Persons RE will be treated by the Company (as data controller) in accordance with the provisions of GDPR and other applicable provisions.

9.4 The treatment is done in order to fulfil the obligations arising under the laws and regulations, the application of which the Company derives from the listing thereof on the electronic stock market regulated and managed by the Italian Stock Exchange. These data will be processed manually or with the aid of electronic instruments, in compliance with legal provisions.

9.5 The refusal to provide the data required pursuant to this procedure would make it impossible for COIMA RES to fulfil its obligations under the applicable laws and regulations, and may justify the provision of sanctions.

9.6 Relevant Persons to MAR and RE Relevant Persons may exercise their rights under the above legislation by contacting the Supervisor of the Company.

10. AMENDMENTS AND ADDITIONS

10.1 Changes and / or additions to this Internal Dealing Procedure that may be necessary as a result of legislative measures or regulations or to the Company's organizational changes must be approved by the President and / or the Managing Director of the Company.

11. FINAL PROVISIONS

11.1 This procedure is sent to Relevant to MAR and with Relevant RE by the Supervisor.

11.2 It is compulsory to Relevant to MAR and with Relevant Persons RE to give notice of this Procedure Respectively Persons closely associated with Relevant to MAR and the Persons closely associated with Relevant RE.

11.3 Each Relevant Person to MAR and RE each Relevant Person must:

- return to the Supervisor the following form under Annex C in receipt sign and acceptance of this procedure;
- comply with the provisions of the Procedure;
- contact the Person in Charge in case of need for clarification on the modalities of application of the procedure.

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12. ENTRY INTO FORCE

12.1 This Procedure is effective from the date of commencement of trading of the Company's shares on the MTA market organized and managed by Borsa Italian SpA

12.2 The procedure was updated on February 21, 2019.


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ATTACHED 1 Model notification and public disclosure of transactions carried out by Relevant Persons Tues. in accordance with Implementing Regulation (EU) 523/2016.

1	Data relating to the person who performs administrative, supervisory and management / the person closely associated	
to)	First name	<p><i>For individuals:</i> First name: Surname:</p> <p><i>For legal entities:</i> Name:</p>
2	Reason for notification	
to)	Position / title	<p><i>[For people who exercise of administrative, supervisory and management: identify the location (eg, CEO, CFO) occupied within the issuer, the participant in the emission allowance market, d 'platform auction, the auctioneer, the auction monitor.]</i></p> <p><i>[For people closely associated,</i> - indicate that the notification relates to a person closely associated with a person discharging managerial, control or management; -the name and surname and position of the relevant person who performs administrative, supervisory and management.]</p> <p><i>For people who exercise of administrative, supervisory and management:</i> Position held:</p> <p><i>For people closely associated:</i> Indicate that the notification relates to a person closely associated:</p> <p>Person exercising management function, control or management First name: Surname: Position:</p>
b)	Initial reporting / editing	<p><i>[Indicate whether this is an initial notification or modification of a previous notification. In case of change, explaining the error is corrected with this notification]</i></p> <p>Initial notification: Changing the previous notification Reason for change:</p>
3	Data relating to the issuer, the participant in the emissions trading market, the auction platform, the auctioneer or the auction monitor	
to)	First name	<i>[Full name of the entity.]</i>
b)	SHE	<i>[ID code of the legal entity, in conformity with the LEI of which code to ISO 17442.]</i>

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4	relating to the transaction data: section to be repeated for i) each type of instrument; ii) each type of operation; iii) each date; and iv) each place where the operations were carried out					
to)	Description of the financial instrument, type of instrument Identification Code	<ul style="list-style-type: none"> – Indicate the nature of the instrument: <ul style="list-style-type: none"> – action, a debt instrument, a derivative or a financial instrument linked to an action or a debt instrument; – a share issue, an object auction product based on emission allowances or a derivative of emission allowances. – Identification of the instrument code as defined in the Commission delegated regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the reporting of transactions to the competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.] 				
b)	Nature of transaction	<p>[Description of the type of operation using, if necessary, the types of operations set out in Article 10 of the Delegated Regulation (EU) 2016/522 of the Commission adopted pursuant to Article 19, paragraph 14 of Regulation (EU) 596 / 2014.</p> <p>In accordance with Article 19, paragraph 6, letter c) of Regulation (EU) No. 596/2014, indicate whether the operation is linked to the use of share options programs]</p> <p>Operation related to the use of programs of options:</p>				
c)	Price / i and v / s	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Price / i</th> <th style="width: 50%;">Volume / i</th> </tr> </thead> <tbody> <tr> <td style="height: 30px;"></td> <td></td> </tr> </tbody> </table> <p>[If more transactions of the same nature (purchase, sale, hiring and granting a loan, etc.) On the same financial instrument or the same emission allowances are made on the same day and in the same place, indicate in this field the prices and volumes of such operations, on two columns as shown above, by entering all the required lines.</p> <p>Use standards regarding data for the price and quantity, including, if necessary, the price of the currency and the currency of the amount, as defined by the Commission delegated regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the reporting of transactions to the competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</p>	Price / i	Volume / i		
Price / i	Volume / i					
d)	Aggregate Information: – aggregate Volume – Price	<p>[The operations of multiple volumes are aggregated when these operations:</p> <ul style="list-style-type: none"> – refer to the same financial instrument or at the same level of emission; – They are of the same nature; – They are made the same day and – They are carried out in the same place. <p>Use standards regarding data for the amount, including, if necessary, the currency of the amount, as defined in the Commission delegated regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the reporting of transactions to the competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</p> <p>[Price information:</p> <ul style="list-style-type: none"> – in the case of a single operation, the individual transaction price; – in the case in which the volumes of multiple operations are aggregated: the weighted average price of aggregated transactions. <p>Use standards regarding data for the price, including, if necessary, the price of the currency,</p>				

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		<i>as defined in the Commission delegated regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the reporting of transactions to the competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</i>
is)	Date of the transaction	<i>[Date of the notified transaction execution date. Use the ISO 8601 format: YYYY-MM-DD; UTC.]</i>
f)	Place operation	<p><i>Name and identification code of the trading venue under MiFID, systematic internaliser or trading platform organized outside the Union in which the operation was carried out as defined by the Commission delegated regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the reporting of transactions to the competent authorities taken pursuant to Article 26 of Regulation (EU) No. 600/2014, or if the operation has not been performed in one of the above locations, return "outside of a trading venue."]</i></p> <p>Name of the trading venue: Identification code:</p>

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ATTACHED [2] Model notification and public disclosure of the transactions carried out by Relevant Persons RE

1	Data relating to the person who performs administrative, supervisory and management / the person closely associated	
to)	First name	<i>For individuals:</i> First name: Surname: <i>For legal entities:</i> Name:
2	Reason for notification	
to)	Position / title	<i>Person who holds shares amounting to at least 10 percent of the issuer:</i> <i>Person who controls the listed issuer:</i> ----- <i>Subject closely linked</i> Indicate that the notification relates to a person closely related to: <i>For individuals:</i> First name: Surname: <i>For legal entities:</i> called:
b)	Initial reporting / editing	<i>[Indicate whether this is an initial notification or modification of a previous notification. In case of change, explaining the error is corrected with this notification]</i> Initial notification: Changing the previous notification: Reason for change:
3	Data relating to the issuer, the participant in the emissions trading market, the auction platform, the auctioneer or the auction monitor	
to)	First name	<i>[Full name of the entity.]</i>
b)	SHE	<i>[ID code of the legal entity, in conformity with the LEI of which code to ISO 17442.]</i>
4	relating to the transaction data: section to be repeated for i) each type of instrument; ii) each type of operation; iii) each date; and iv) each place where the operations were carried out	
to)	Description of the	

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	financial instrument, type of instrument Identification Code					
b)	Nature of transaction	<i>[Purchase, sale, exchange, subscription]</i>				
c)	Price / i and v / s	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">Price / i</th> <th style="width: 50%;">Volume / i</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <p><i>[If multiple transactions of the same nature are carried out on the same day and in the same place, indicate in this field in an aggregated form, and the volume and the overall weighted average price of such operations]</i></p>	Price / i	Volume / i		
Price / i	Volume / i					
d)	Date of the transaction	<i>[Date of the notified transaction execution date. Use the ISO 8601 format: YYYY-MM-DD; UTC.]</i>				
is)	Place operation	Name of the trading venue: Identification code:				

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ATTACHED [3] STATEMENT OF ACCEPTANCE OF INTERNAL DEALING PROCEDURE BY THE RELEVANT TUES

I, the undersigned / a _____ born / a _____ the _____, residing in _____, with tax code _____, in the quality of _____ and as such included in the list of relevant persons of COIMA company RES SpA SIIQ (the "Company") pursuant to 'Article 3, paragraph 1, no. 25 of Regulation (EU) No. 596/2014 (the "Relevant TUES") and the procedure on the principles and rules relating to the prevention of so-called market abuse ("market abuse") (hereinafter the "Procedure") adopted by the Company,

- I noted that he was / a on / TUES in the list of Relevant Persons as to the procedure;
- certifying that they have received a copy of the procedure and to have read and understood the provisions;
- aware of the legal obligations placed against him by the applicable governing internal dealing rules and procedure and sanctions for failure to comply with such obligations;

now therefore

- claims to have received the procedure prepared by the Company, he is aware of the provisions contained therein and accepts in full the contents;
- He declares to engage with the maximum diligence (i) scrupulous compliance with the provisions contained in the aforementioned Procedure; (li) to make them known to people closely connected to the same in accordance with Article 3, paragraph 1, no. 26 of Regulation (EU) No. 596/2014 (the "Closely Related TUES") to the terms of the procedure itself, and (iii) to ensure - pursuant to Article 1381 of the Civil Code - that Closely Related TUES punctually fulfil these obligations;
- He claims to hold the Company harmless against any damages or loss that the same may arise from failure, delayed or incorrect compliance on my part of the obligation from the internal dealing procedure and the procedure;
- indicates the following contact details:
 - n. tel. _____
 - n. fax _____
 - email address _____

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- It indicates the following names of Closely Related Ties due to the same, which is obliged to notify in writing their obligations under applicable law and procedure and keep a copy of the notification:

Full name / Company name (*)	Place and date of birth / address of the registered office (*)	Fiscal Code	Type of bond (**)

(*) For legal persons.

(**) Enter the letter corresponding to the link in place in accordance with the table below:

TO	Spouse not legally separated or partner as a spouse under applicable legislation
B	Children, including the spouse, dependents
C	Parents, relatives and related (if living together for at least one year)
D	Legal persons, trusts and partnerships whose managerial responsibilities are covered by the Significant Ties or by a Person Closely Related Ties indicated in letters A, B or EC
IS	Legal persons, trusts and partnerships controlled directly or indirectly by the Significant Ties or by a Person Closely Related Ties listed above
F	Legal persons, trusts and partnerships set up in favour of the Relevant Ties or one of the Person Closely Related Ties listed above
G	Legal persons, trusts and partnerships whose economic interests are substantially equivalent to those of the Relevant Ties or one of Closely Linked Person Ties listed above


- It agrees to notify the Company of any changes relating to the Closely Related to MAR;
- Pursuant to the (EU Regulation effects) 2016/679, I have received by the data COIMA RES SpA SIIQ the information required by art. 13 of Regulation (EU) 2016/679 (the text of which is reported under "Attachment 7").

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Place / Date

_____ / _____

(Signature)

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ANNEX [4] DECLARATION OF ACCEPTANCE OF INTERNAL DEALING PROCEDURE BY RELEVANT PERSONS RE

Dear


COIMA RES SpA SIIQ
Piazza Gae Aulenti, 12
20154 Milano

Subject: Statement of full knowledge and acceptance of the Internal Dealing Procedure

The undersigned _____ born in _____ on _____, in his capacity as Relevant RE of the listed REIT companies COIMA RES SpA, pursuant to art. 152 sexies, paragraph 1, lett. c) of Consob Regulation no. 11971/99, as subsequently amended, (the "Issuers Regulation") declares to have received adequate information as well as full copy of the Internal Dealing procedure that is reported sub Attachment 1 to this and to accept the content, committing to respect the requirements and to notify to qualified entities such as Closely Related to relevant Persons RE pursuant to art. 152-sexies, paragraph 1, lett. d), of the Issuers Regulation.

_____, on _____

Signature

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ANNEX [5] INFORMATION TO PERSONS CLOSELY LINKED BY THE RELEVANT

Subject: Procedure for market abuse COIMA RES SpA SIIQ ("Procedure") - Notification of obligations under the Procedure

Dear / Gent.ma _____

in fulfilment of the obligation in Article 19 of Regulation (EU) No. 596/2014 (the "Regulation Tues") and the procedure adopted by COIMA RES SpA SIIQ (the "Company"), of which the undersigned is relevant person pursuant to Article 3, paragraph 1, no. 25 MAR Regulations (the "Relevant mar"), with the present, would like to inform:

- that was / identified in / to which person closely linked to the undersigned pursuant to Article 3, paragraph 1, no. 26 MAR Regulation (the "**Closely Related Tues.**") And the Procedure and thus will be inserted / a list of Closely Related Tues held by the Company;
- which is held / AA comply with legal obligations relating to dealing and, in particular internal, the reporting requirements set out in Article 19 MAR and Procedure Rules;
- also in view of the sanctions that can be imposed for infringement of the aforementioned disclosure requirements, I invite you to read the rules and the Procedure (attached hereto and available on the Company's website).
- under and for the purposes of Regulation (EU) 2016/679, he claims to have received from the data controller COIMA RES SpA SIIQ the information required by art. 13 of Regulation (EU) 2016/679 (the text of which appears under "Annex7").

To comply with the requirements of the legislation, I beg you to give me back a copy of this procedure and duly initialled, dated and signed for acknowledgment and acceptance.

Place / Date


_____ / _____

(Signature)


FOR RECEIPT

Place / Date

_____ / _____

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(Signature)

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ANNEX [6] EXEMPTIONS FROM THE PROHIBITION OF BLACK OUT PERIOD

A Relevant Person may take Tues. Relevant Transaction during a Black-Out Period if:

(to) it is in any of the following circumstances:

(I) based on a case-by-case, no exceptional conditions, such as severe financial difficulties requiring immediate sale of Shares; or


(II) by reason of the trading features, in case of operations carried out simultaneously or in relation to compensation plans or shareholdings, the establishment of a guarantee, or acquisition of a right to subscribe or assignment or purchase of Shares, or in the case of transactions that do not change the ownership of a Security;

(B) the Relevant MAR able to demonstrate that the Relevant Transaction Tues. It cannot be made at another time if not during the Black Out Period.

In the cases mentioned in paragraph (a) (i):

(to) the Relevant Tues. can fulfil the Operation Relevant Tues during the Black-Out Period without the prior permission of the CEO and / or Chairman, who must send, via the Supervisor, at least 5 calendar days before the reasoned written request date scheduled for the execution of the Relevant MAR. This application must include a description of the Relevant to MAR and an explanation, in reasonable detail, the exceptional circumstances requiring immediate sale of the Shares and the reasons why the sale of the Shares is the only reasonable way to get the funds it need;

(B) The Chief Executive Officer carries out a case-by-case basis by the Supervisor and authorizes the immediate sale of the Shares during the Black-Out Period only if there are exceptional circumstances, i.e. in extremely urgent situations, unexpected and compelling that are not attributable to the individual concerned and are beyond its control. For the purposes of evaluation of the exceptional nature of the circumstances indicated by the Significant Tues. in its written request, the Chief Executive Officer currency, through the Supervisor, for example, if: (i) the Relevant Tues must fulfil a financial obligation legally enforceable or satisfy a claim, including tax obligations; (II) the fact that determines the payment obligation arose before the Black-Out Period; (III) the Relevant Tues. cannot reasonably fulfil the payment obligation except through immediate sale of the Shares.

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In the cases mentioned in paragraph (a) (ii), a Relevant Tues. can accomplish the Relevant Transaction Tues during the Black-Out Period, provided that:

- (to) covering the allocation of Financial Instruments as part of plans for employees, the plan has been approved in accordance with the law from time to time applicable and explicitly governing:
 - (I) the manner and timing for the assignment;
 - (li) the procedures for determining the number of Securities to be assigned, so that:
 - (A) cannot be discretionary assessments of the Board of Directors or delegated the matter bodies;
 - (B) there is the option of the Relevant MAR refuse the allocation of the Securities; is
 - (C) the assignment cannot be affected by privileged information; is
 - (lii) the categories of beneficiaries of the plan;
- (B) with reference to the exercise of options or warrants or conversion rights of convertible bonds (the "Options") awarded in compensation plans:
 - (I) the exercise period or the deadline will be within a Black-Out Period;
 - (li) the Shares resulting recourse to these options are sold;
 - (lii) the means of written communication sent through the Supervisor Relevant MAR requires prior authorization from the CEO, at least four months before the deadline for the exercise of such options, indicating the number, the type of rights that intends to exercise, the compensation plan under which have been assigned and the date on which it intends to exercise indicatively, specifying that the decision to exercise is irrevocable;
 - (Iv) the Chief Executive Officer, verified by the Person in Charge, that the requirements referred to in this paragraph, authorizes the exercise of rights during the Black-Out Period.
- (C) covering the allocation of Securities under saving schemes for employees
 - (I) has adhered to the floor before the closing period, except in cases where there may not adhere at another time due to the start date of employment;

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(li) does not modify the conditions of their participation in the plan, or revoke such participation during the Black-Out Period;

(lii) the purchase transactions are clearly organized based on the terms of the plan and the Relevant Tues has no right or legal possibility to modify them during the Black-Out Period, or such operations are planned under the so plan such that they take place in a predetermined date included in the Black-Out Period;


(D) with reference to transfers that do not change the ownership of the Securities, whether it is a transfer from an account in the Relevant Sea to another account in the Relevant (and the transfer does not involve changes in the price of the Securities);

(is) with reference to the establishment of a guarantee or purchase of the right to subscribe for or purchase or assignment of Shares:

(I) the deadline for the provision of such guarantee or acquisition of this right is included in a Black-Out Period;

(li) the Relevant Tues requires the prior approval of the Chief Executive, by means of written communication sent in due time before the end of paragraph (i), indicating the number of Shares or of the rights concerned, the type of rights that would acquire and reasons for which the acquisition has not been performed before;

(lii) the CEO, through the Supervisor, authorized releases.

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ANNEX [7] PRIVACY

PRIVACY DISCLAIMER

*Former art. 13 of EU Regulation 679/2016
and the applicable provisions on privacy*

Premise

Under Article. 13 of the EU Regulation n. 679/2016 concerning the protection of personal data (hereinafter "Regulation"), COIMA RES SIIQ SpA, with registered office in Piazza Gae Aulenti, 12, 20124 Milano (the "Company"), as a data processor informs you that your personal data and, where necessary in accordance with law, the personal data of your family members and / or the like, will be handled in compliance with the aforementioned law and the obligations of confidentiality, according to the principles of fairness, legality and transparency which inspires the activities of our Company.

In this regard, the Company will treat personal information by taking all necessary steps to ensure appropriate security and confidentiality of the same, also in order to prevent access or unauthorized use of personal data and the means by which treatment it is done.

1. Purpose and legal basis of the treatment

Your personal data, including judicial data and, where necessary in accordance with law, the personal data of your family members and / or the like, will be collected and processed solely for the performance of activities related to internal transactions as provided for in Commission Regulation (EU) No. 596/2014 (the "MAR") and the Consob Regulation no. 11971/99, as amended, (the "Issuers Regulation").

In particular, the processing of such data will be made for the following purposes.

- i. Communication of transactions involving:
 - a. equity or debt instruments issued by the Company, as well as derivatives or other financial instruments - as defined in Article 4, paragraph 1, point 15 of Directive (EC) 2014/65, and (a) admitted to trading on a regulated market or for which it has received a request for admission to trading on a regulated market; (B) negotiations on a MTF, admitted to trading on a MTF or for which has been submitted a

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request for admission of a MTF; (C) negotiations on an OTF; or (d) the price or value depends on a financial instrument under (a) - (c), which take effect on the price or value (including, without limitation, credit default swaps and contracts for difference) - connected to them in accordance with art. 3, paragraph 2, letter. b) MAR Regulation (collectively, the "Tues. Financial Instruments") performed by Tues. Relevant Persons and Persons Closely Related with Relevant Persons to MAR;

b. the Company's shares and financial instruments linked to shares as defined under. 152-sexies, paragraph 1, lett. b) of the Issuers' Regulations (collectively, the "Securities RE") RE by Relevant Persons and Persons Closely Related with Relevant RE;

- ii. Fulfilment of obligations under the law, regulations, or any other relevant national or Community rules applicable, or in compliance with the provisions issued by authority to do so by law, including orders issued by state bodies within the framework of official inquiries in respect of the obligations law.

The legal basis of the above data processing is the fulfilment of specific legal obligations related to your office.

2. Retention of personal data

The personal information you provide, including personal data of your family and / or the like, will be kept for the time necessary to achieve the purposes for which they were collected and, in any case, in compliance on limitation periods in accordance with relevant law, as well as to assert or defend a right of the Company, both in the litigation in the phase prior to it.

3. Nature of personal data and consequences of the failure to communicate

The provision of personal data required for the purposes specified above is necessary for the recruitment of his office. Therefore, the failure or partial communication of the same make it impossible for the management of relations with the Company arising from the same position, as well as the proper fulfilment of legal requirements relating to the same.

4. Categories of recipients of personal data and individuals who can learn about them

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The data will be disseminated and may be disclosed for the purposes mentioned above, the following categories of persons: (i) other COIMA society, companies, persons, associations or offices that offer services or assistance and advice or provide services to our Company, with special but not exclusive reference to accountancy, administrative, legal, tax and financial management; (lii) banks for the payment of wages and insurance companies; (lv) individuals who are authorized to access the Data is recognized by laws and secondary regulations or provisions issued by authorities to do so by law.


Data can also be will be brought to the attention of our staff that will treat them as a data processor.

5. Rights

You can exercise in the cases expressly provided by law, the rights laid down in Articles 15 to 21 of the Regulations. In particular, you have the right to:

- ask for confirmation that the access to information relating to the same treatment (eg. purpose, categories of data processed, the recipients or categories of recipients of both current processing of your personal data and, if so, to require the data controller data, storage period, etc.);
- request the correction of inaccurate or incomplete data;
- ask the holder the erasure of the data (eg. if the personal data are no longer necessary with respect to the purposes for which they were collected, in the case of withdrawal of consent on which the processing is based, etc.)
- requested the restriction of the treatment (eg. if challenged by you on accuracy; if the treatment is unlawful and you oppose the erasure of personal data if the data are necessary for the exercise or defense in court of your law, even if the holder no longer needs, in case of exercise of the right of opposition, for the time necessary to verify the existence of legitimate reasons).
- ask to receive in a format readable and common use by automatic device (eg. pdf) personal data that concern and to transmit them to another controller, or to obtain the direct transmission from one holder to another, if technically feasible (cd data portability).

She also has the right to object in whole or in part, for legitimate reasons, the processing of personal data concerning them.


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You may exercise the rights described by sending a request to the email address privacy@coimares.com.

Finally, if it considers that the processing of data in violation of the legislation on protection of personal data, you have the right to complain to the Guarantor Authority for the protection of personal data (www.garanteprivacy.it).

The treatment

COIMA RES SpA SIIQ In its legal representative pro tempore.

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APPENDIX REGULATIONS

Commission Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 (the "MAR" Regulation)

definitions

1. For the purposes of this Regulation shall apply:

[Snip]

25) "person engaged in administrative, management or supervisory body" means a person, within an issuer, a participant in the emissions trading market or other entity referred to in Article 19, paragraph 10, which is:

- a) member of the management or control of such entity; or
- b) a senior executive, who is not a member of the organs referred to in subparagraph a), having regular access to inside information relating, directly or indirectly such entities, and the power to make management decisions that may affect the future and the the prospects of that entity;

26) "person closely connected":

one of the following persons:

- a) a spouse or partner as a spouse under national law;
- b) a dependent child as defined by national law;
- c) a relative who has shared the same household for at least one year of the transaction date in question; or
- d) a legal person, trust or partnership, whose managerial responsibilities are covered by a person performing administrative functions, control or management or a person referred to in letters a), b) or c), either directly or indirectly controlled by such person, or is up for the benefit, or whose economic interests are substantially equivalent to those of such person;

[Snip]

Art. 19

Operations carried out by persons engaged in administrative, supervisory and management

1. Those who hold administrative, control or management, as well as persons closely associated with them, shall notify the issuer or the participant in the allowance market and the competent authority referred to in paragraph 2, the second paragraph:

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- a) with respect to issuers, all transactions on their behalf regarding the shares or debt instruments of that issuer, or to derivatives or other financial instruments connected to them;
- b) as regards the participants in the emission allowance market, all transactions on their behalf concerning allowances, the auction object products based on them or their derivatives.

These notifications shall be promptly and no later than three working days after the transaction date.

The first paragraph shall apply if the total amount of operations has reached the threshold defined in paragraph 8 or paragraph 9, if appropriate, within a calendar year.

1a. The notification referred to in paragraph 1 shall not apply to transactions in financial instruments linked to shares or the debt instruments referred to in that paragraph if, at the time of the transaction, it meets one of the following conditions:


- a) the financial instrument consists of a share or an action of a collective investment scheme in which the exposure to the shares or the debt instruments shall not exceed 20% of the assets held by the collective investment;
- b) the financial instrument provides exposure to a portfolio of assets in which the exposure to the shares or the debt instruments shall not exceed 20% of portfolio assets; or
- c) the financial instrument consists of a share or an action of a collective investment scheme or provides exposure to a portfolio of assets and the person who exercises managerial responsibilities or the person closely associated with it knows, or could know the composition of investments or exposure to the undertaking for collective investment or portfolio of assets in relation to the shares or the debt instruments, and also there are no grounds for doubting that person to believe that the actions or instruments the issuer's debt exceed the thresholds referred to in subparagraph a) or b).

If you have information on the composition of the body's investments in collective investment or exposure to the portfolio of assets, the person holding managerial responsibilities or the person closely associated with it has made every effort to use that information.

2. For the purposes of paragraph 1 and without prejudice to the right of Member States to provide for notification obligations other than those referred to in this article, all transactions for own account of persons referred to in paragraph 1 shall be notified by these persons to the authorities competent.

The rules applicable to notifications to the persons referred to in paragraph 1 must comply with shall be those of the Member State in which the issuer or participant in the emissions trading market is registered. The notification shall be made within three working days from the transaction date to the competent authority of the Member State concerned. When the issuer is not registered in a Member State, the notification is sent to the competent authority of the Member State of origin in accordance with Article 2, paragraph 1, letter i) of Directive 2004/109 / EC or, in his absence, the competent authority of the trading venue.

3. The issuer or the participant in the emissions trading market shall ensure that the information notified under paragraph 1 are made public in a timely manner and no later than three working days from the transaction in order to provide rapid access to such information

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on non-discriminatory basis, in accordance with the implementing technical standards referred to in Article 17, paragraph 10, subparagraph a).

The issuer or the market participant of emission allowances using the media as may reasonably be effective dissemination of information to the public throughout the EU and, where appropriate, makes use of the mechanism established officially referred to ' Article 21 of Directive 2004/109 / EC.

Alternatively, national law may provide that a competent authority may be disclosed to the public the information.

4. This article shall not apply to issuers who:

a) requesting or approved admission of their financial instruments to trading on a regulated market; or

b) in the case of an instrument only traded on a MTF or an OTF, they have authorized the trading of their financial instruments on a MTF or an OTF or have applied for admission of their financial instruments to trading on an MTF.

5. The issuers or participants in the emissions trading market shall notify in writing to the persons engaged in administrative, supervisory and management obligations due to them under this article. The issuers or participants in the emissions trading market shall draw up a list of all those who hold administrative, control or management and persons closely associated with them.

Those who hold administrative, control or management shall notify in writing to people closely associated with their obligations under this Article and retain a copy of the notification.

6. A notification of transactions referred to in paragraph 1 shall contain the following information:

a) the person's name;

b) the reason for the notification;

c) identification of the issuer or the participant in the emissions trading market concerned;


d) the description and identification of the financial instrument;

e) nature of the transaction or transactions (eg acquisition or disposal), indicating whether they are related to the use of options on shares or programs to the specific examples set out in paragraph 7;

f) the date and place of the transaction or transactions; as well as

g) the price and volume of the transaction or transactions. In the case of an assignment as collateral the details of which provide for a change in value, that fact should be made public together with the value at the date of the pledge.

7. For the purposes of paragraph 1, the operations which must be notified to also include:

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a) the pledging or lending of financial instruments by or on behalf of a person who performs administrative, supervisory and management or a person closely related to it, referred to in paragraph 1;

b) transactions carried out by those who prepare or perform in a professional capacity operations or by anyone on behalf of a person who performs administrative, supervisory and management or a person closely associated referred to in paragraph 1, even when is exercised discretion;

c) operations carried out under a life insurance policy, defined in accordance with Directive 2009/138 / EC of the European Parliament and the Council, in which:

i) the policyholder is a person who performs administrative, supervisory and management or a person closely associated referred to in paragraph 1;

ii) the investment risk is borne by the contractor; is

iii) the contractor has the power or discretion to make investment decisions in relation to specific instruments provided other than life in question, or conduct transactions involving investments specific to the life insurance instruments.

For the purposes of point a), it is not necessary to notify a constitution in financial instruments pledge, or other comparable guarantee, in connection with the filing of the financial instruments on accounts in custody, unless and until such a pledge or other guarantee similar or application for a specific credit facility.


According to letter b), transactions performed on equity or debt instruments of an issuer or in derivatives or other financial instruments associated with them, by managers of a collective investment scheme in which the person holding managerial responsibilities or the person closely associated with it has invested, are not subject to the notification obligation if the organism collective investment manager acts in total discretion, which excludes the possibility that he may receive instructions or suggestions of any kind on the composition of the portfolio, directly or indirectly, by investors of the undertaking for collective investment.

To the extent that a contractor of an insurance contract must report transactions in accordance with this paragraph, the insurance company does not rest or obligation.

8. Paragraph 1 shall apply to all subsequent operations once it has reached a total amount of EUR 5 000 in a calendar year. The EUR 5 000 threshold is calculated by summing all the operations without compensation referred to in paragraph 1.

9. A competent authority may decide to increase the threshold referred to in paragraph 8 to 20 000 and inform ESMA of its decision to adopt a higher threshold, as well as of its reasons, with specific reference to market conditions, before his application. ESMA shall publish on its website the list of applicable thresholds under this Article and the reasons given by the competent authorities to justify these threshold values.

10. This Article shall not apply to transactions carried out by those who hold administrative, control or management at any auction platform, auctioneer and auction monitor affected by the auctions held in accordance with Regulation (EU) n. 1031/2010 and to persons closely associated with them, to the extent that their operations concerning emission allowances and their derivatives and related products auctioned. Such persons must report their

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operations to the auction platform, the auction commissioners and the auction monitor, as appropriate, and the competent authorities which have recorded the auction platform, the auctioneer or the overseer d ' rod, depending on the case. The notified information is made public by the auction platform, the auction commissioners,

11. Without prejudice to Articles 14 and 15, a person who exercise administrative, supervisory and management with an issuer does not carry out operations on their own or on behalf of third parties, directly or indirectly, related to the shares or to debt instruments of that issuer, or to derivatives or other financial instruments linked to them, during a closing period of 30 calendar days before the announcement of an interim financial report or a year-end report that its issuer is required to make public by:

- a) the rules of the trading venue on which the issuer's shares are admitted to trading; or
- b) national law.

12. Without prejudice to Articles 14 and 15, an issuer may allow a person exercising functions of administration, control or direction of dealing on own account or on behalf of third parties over a period of closure referred to in paragraph 11:

- a) based on a case-by-case basis in exceptional conditions, such as severe financial difficulties requiring immediate sale of shares; or
- b) because of the characteristics of negotiation in the case of operations conducted simultaneously or in connection with an employee share ownership or savings plan program, a guarantee or rights to shares, or even operations where the interest of the beneficiary on the title in question it is not subject to change.

[Snip]

Chief Regulation (EU) 2016/522

Article 7

Negotiation during a period of closure

1. A person engaging in administrative, supervisory and management with an issuer has the right to conduct business during a period of closure as defined in Article 19, paragraph 11 of Regulation (EU) No. 596/2014 provided that the following conditions are met:

- a) it satisfies the conditions laid down in Article 19, paragraph 12 of Regulation (EU) No. 596/2014;
- b) the person who performs administrative, supervisory and management is able to demonstrate that the specific operation cannot be performed at any other time except during the period of closure.

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2. In the circumstances referred to in Article 19, paragraph 12, letter a) of Regulation (EU) No. 596/2014, before any negotiation during the closing period of a person exercising administrative, supervisory and management functions shall request the broadcaster, by reasoned written request for permission to immediately sell its shares during a closed period.

This request contains a written description of the transaction and considered an explanation for why the sale of the shares is the only reasonable way to obtain the necessary funding.

Article 8

exceptional circumstances

1. In deciding whether to permit the immediate sale of their shares during a closed period, the issuer makes a case by case evaluation of the written request referred to in Article 7, paragraph 2, submitted by the person who performs administrative, control or management. The issuer has the right to authorize the immediate sale of shares only if the circumstances of such operations can be considered exceptional.

2. The circumstances referred to in paragraph 1 shall be considered exceptional if it is extremely urgent situations, unexpected and compelling that are not attributable to the person who performs administrative, supervisory and management and are beyond its control.

3. When examining whether the circumstances described in the written request referred to in Article 7, paragraph 2, are outstanding, an issuer assesses, among other indicators, whether and to what extent the person exercising administrative, control or management:

a) at the time of submission of the request has to fulfil a legally enforceable financial obligation or satisfy a claim;

b) must be fulfilled or is in a situation prior to the closing period which requires the payment of an amount to a third party, including tax obligations, and that person cannot reasonably fulfil a financial obligation or satisfy a claim unless selling the shares immediately.

Article 9

Features of trading during a period of closure

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The issuer has the right to authorize the person who performs administrative, supervisory and management functions within the issuer to deal on own account or on behalf of third parties at a closed period in certain circumstances, among other situations in which:

a) the person who performs administrative, supervisory and management had been granted or awarded financial instruments as part of a plan for employees, provided that the following conditions are met:

i) the plan for its employees and its conditions have been previously approved by the issuer in accordance with national legislation and conditions of the plan specifies the time for the assignment or the right and the amount of allocated or granted financial instruments, or the basis for calculation of this amount, provided that they cannot be exercised discretionary powers;

ii) the person who performs administrative, supervisory and management has no power of discretion as to the acceptance of financial instruments attributed or granted;

b) the person who performs administrative, supervisory and management had been attributed or granted securities as part of a plan for employees who cooperated during the closing period, provided it is applied to a previously planned method and organized with regard to the conditions, and the frequency allocation delay, provided they are given the group of authorized persons whose financial instruments are granted and the amount of financial instruments to be awarded and provided that the assignment or grant of financial instruments to take place within a framework established in which such attribution or concession cannot be influenced by any inside information;

c) the person who performs administrative, supervisory and management exercised options or warrants or conversion rights of convertible bonds that have been assigned as part of a plan for the employees, if the expiry date of such options, warrants or convertible bonds is included in a closing period, and sells the shares acquired following the exercise of such options, warrants or conversion rights, provided that all the following conditions are met:

i) a person who is administrative, control or direction issuer notification of its decision to exercise the options, warrants or conversion rights at least four months before the due date;

ii) the decision of the person who performs administrative, supervisory and management is irrevocable;

iii) the person who performs administrative, supervisory and management has been authorized in advance by the issuer;

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d) the person who performs administrative, supervisory and management acquires securities of the issuer as part of a savings plan for employees, provided that all the following conditions are met:

i) the person who performs administration functions, control or management has adhered to the floor before the closing period, except in cases where there may not adhere at another time due to the start date of employment;

ii) the person who performs administrative, supervisory and management does not change the conditions of their participation in the plan or withdraw such participation during the period of closure;

iii) the purchasing operations are clearly organized on the basis of the conditions of the plan and the person who performs administrative, supervisory and management does not have the right or the legal possibility to modify them during the period of closure, that these operations are planned under the plan in such a way that they take place in a predetermined date included in the period of closure;

e) a person who performs administrative, supervisory and management transfer or receive, directly or indirectly, financial instruments, provided that they are transferred from one account of that person and that the transfer does not involve changes in their price;


f) a person who performs administrative, supervisory and management acquires a guarantee or rights to shares of the issuer and the end date of the acquisition is included in the closed period, in accordance with the issuer's articles of association or by law, provided that such person to the issuer demonstrates why the acquisition has taken place at a different time and the issuer accept the explanation provided.

Article 10

notifiable transactions

1. In accordance with Article 19 of Regulation (EU) No. 596/2014 and in addition to the transactions referred to in Article 19, paragraph 7 of the regulation, people who exercise of administrative, supervisory and management with an issuer or a participant in the allowance market and people or closely associated notify its operations issuer or participant in the allowance market and the competent authority.


The operations subject to notification include all transactions for own account of persons who hold administrative, control or management, and related, with regard to issuers, the shares or debt instruments of the issuer or derivatives or other in-linked financial

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instruments, as regards the participants in the emissions trading market allowances, the auction object products based on them or their derivatives.

2. The transactions subject to reporting include:

- a) the acquisition, sale, short sale, subscription or exchange;
- b) the acceptance or the exercise of option rights, including a right of option granted to persons performing administrative, control or management or employees as part of the compensation due to them, and the sale of shares arising the exercise of a right of option;
- c) the adhesion to exchange contracts related to equity indices or the exercise of such contracts;
- d) transactions in derivatives or connected to them, including the operations to be settled in cash;
- e) the approval of a contract for difference related to an issuer's securities involved or emission allowances or products auction subject pursuant thereto;
- f) the acquisition, disposal or exercise of rights, including the put options and call options, and warrants;
- g) the subscription of a capital increase or an issue of debt instruments;
- h) transactions in derivatives and financial instruments linked to an issuer credit title concerned, including credit default swaps;
- i) conditional operations subordinated to the occurrence of the conditions and the actual execution of transactions;
- j) the automatic or non-automatic conversion of a financial instrument in another financial instrument, including the exchange of bonds convertible into shares;
- k) the donations and donations made or received and inheritance received;
- l) transactions in products, baskets and index derivatives, if so required by Article 19 of Regulation (EU) No. 596/2014;
- m) transactions in shares or units of investment funds, including alternative investment funds (AIF) under Article 1 of Directive 2011/61 / EU of the European Parliament and of the Council (4), if so provided by 'Article 19 of Regulation (EU) No. 596/2014;

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n) the operations carried out by the operator of an AIF which has invested in the person who performs administration functions, control or management or a person closely associated to it, if so provided for in Article 19 of Regulation (EU) n. 596/2014;

o) the operations carried out by third parties as part of an asset management mandate or on an individual portfolio for the account or benefit of a person who performs administrative, supervisory and management or a person closely associated to it;

p) the borrowing and lending of borrowed shares or the debt instruments or derivatives or other financial instruments linked to them.

TUF

Art. 114

(Information to the public)

[Snip]

7. Anyone who hold shares amounting to at least ten percent of the capital, and any other person who controls the listed issuer shall notify Consob and the public of transactions involving shares issued issuer's shares or other instruments financial connected to them, they have carried out, even through a third person. This communication is carried out by persons closely related to all the above, identified by Consob regulations. Consob Regulation identifies with the same operations, the terms and conditions of communications, procedures and time limits to public disclosure of information, as well as cases where those obligations also apply in relation to companies in a control relationship with the issuer.

[Snip]

12. The provisions of this Article shall also apply to Italian and foreign entities that:

- a) They have requested or authorized the admission of financial instruments they issue to trading on a regulated Italian market;
- b) requesting or authorized the trading of the financial instruments that it issues on a multilateral system of Italian trading;
- c) They authorized the trading of such securities in issue of an organized system of negotiation Italian.

TITLE II

ADMINISTRATIVE SANCTIONS

Art. 193

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(Corporate information and duties of auditors, lawyers, auditors and auditing firm)

1. Unless the act constitutes a crime, to companies, organizations and associations required to make the notifications provided for in Articles 114, paragraphs 5, 7 and 9, 114- 114, paragraphs 5, 7 and 9, 114-bis, 115, 116, paragraph 1-116, paragraph 1-bis, 154-bis, 154-ter and 154-quater, for non-compliance with such articles or the related implementing provisions, apply one of the following administrative penalties:

- a) a public statement which indicates the legal person responsible for the violation and the nature of the same, when it is characterized by lack of offensiveness or danger and the infringement has ceased;
- b) an order to eliminate the alleged infringements, with a possible indication of the measures to be taken and the time for performance, and to refrain from repeating them, when those offenses are connoted by poor offensiveness or danger;
- c) a fine of between five thousand euro to ten million euro, or up to five percent of sales when such amount exceeds ten million euro and turnover can be determined pursuant to Article 195, paragraph 1-bis

1.1. If communications indicated in paragraph 1 shall be payable by a natural person, unless the fact constitutes a crime, for infringement shall apply in respect of the latter, one of the following administrative penalties:

- a) a public statement which indicates the person responsible for the violation and the nature of the same, when it is characterized by lack of offensiveness or danger and the infringement has ceased;
- b) an order to eliminate the alleged infringements, with a possible indication of the measures to be taken and the time for performance, and to refrain from repeating them, when those offenses are connoted by poor offensiveness or danger;
- c) a fine of between five thousand Euros to two million euro.

1.2. For violations indicated in paragraph 1, in respect of persons who perform administrative, management or control, as well as personnel, where such conduct has contributed to such violations by the legal person shall, in the cases referred 'Article 190-bis, paragraph 1, letter a), the administrative sanctions provided for in paragraph 1.1.

1-bis. ... omission ...

1-ter. ... omission ...

1-c. The same sanctions referred to in paragraphs 1, 1.1 and 1.2 apply for failure to comply with the implementing provisions issued by Consob pursuant to article 113-ter, paragraph 5, letters b) and c) with respect to persons authorized by Consob the exercise of the broadcasting service and storage of regulated information.

1-d ... omission ...

[...]

2-bis. ... omission ...

3. it applies the administrative penalty of € ten thousand to EUR one million and five hundred thousand:

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a) the components of the auditors, monitoring and advice of the Committee for the management control who commit irregularities in performing the duties provided for in Article 149, paragraphs 1, 4-bis, the first period, and 4-ter, or fail to provide the information required in article 149, paragraph 3;

b) ... omission.

3-bis. Unless the act constitutes a crime, members of the supervisory bodies, who fail to execute within the prescribed notices under Article 148-bis, paragraph 2, are punished with administrative fine equal to twice the annual compensation provided for the position in respect of which the notification is not given. With the sanction also declared its fall from office.

3-ter. ... omission ...

ISSUER REGULATIONS

Chapter II

Section I

Transactions concluded by relevant persons and persons closely associated with them

Art. 152-sexies

(Definitions)

1. In this Chapter shall apply:

a) "listed issuer" companies referred to in Article 152-septies, paragraph 1, of this Regulation;

b) "financial instruments linked to shares":

b.1) financial instruments that permit the subscription, acquisition or disposal of shares;

b.2) debt financial instruments convertible into shares or exchangeable for shares;

b.3) derivative financial instruments based on shares referred to in Article 1, paragraph 3, of the Consolidated Law;


b.4) other financial instruments, equivalent to shares, representing such shares;

c) "relevant persons" is anyone who holds a holding, calculated pursuant to Article 118, of at least 10 per cent of the share capital of the listed, represented by shares with voting rights, and any other party that controls' listed issuer

d) "persons closely associated with Relevant Persons":

d.1) spouses, unless legally separated, children, including those of the spouse, dependent, and, if cohabiting for at least one year, parents, relatives and in-laws of the relevant persons;

d.2) legal entities, partnerships and trusts in which a relevant person or one of the persons referred to in subparagraph d.1) holds, alone or jointly responsible for management;

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d.3) legal persons controlled directly or indirectly by a relevant person or one of the persons listed in Letter d.1);

D.4) the people whose economic interests are substantially equivalent to those of a relevant person or one of the persons referred to in subparagraph d.1);

D.5) trusts set up in favour of a relevant person or one of the persons referred to in subparagraph d.1).

Art. 152-f

(Scope of)

1. The obligations laid down in respect of the relevant persons in Article 114, paragraph 7 of the Consolidated Law shall apply:

- a) Italian companies issuing shares traded on Italian regulated markets or Community;
- b) to share issuers listed on a regulated market that are based in a state of the Union and have Italy as the home Member State.

2. The obligations laid down in respect of the relevant persons in Article 114, paragraph 7 of the Consolidated Law shall apply to the purchase, sale, subscription or exchange of shares or financial instruments linked to shares.

3. Not disclosed:


t) operations whose total amount is less than twenty thousand euro by the end of the year; after each communication are not communicated transactions whose total amount does not reach a value of more twenty thousand euro by the end of the year; for financial derivatives, the amount is calculated by reference to the underlying shares;

- b) transactions between the relevant person and the persons closely related;
- c) the operations carried out by the same listed issuer and by companies from its subsidiaries;
- d) the operations carried out by a credit institution or an investment firm which contribute to portfolio construction negotiation of such an entity or company, as defined in Article 4, paragraph 1, point 86, of Regulation (EU) n. 575/2013, provided that the same subject:

- takes organizationally separated from Treasury and the structures that manage strategic investments, structures trading and market making;
- is able to identify the shares held for the purpose of trading and / or market making, using methods that can be subject to verification by Consob, or by holding the same in a special separate account;

and, when it is acting as a market maker,

- It is authorized by its home Member State under Directive 2004/39 / EC to the conduct of market making;
- Consob to provide market making agreement with the market management company and / or the issuer may be required by law and its implementing provisions in force in the EU Member State where the market maker does business;
- notifies Consob which intends to carry or carries out market making activities on the actions of a listed issuer, using the TR-2 model contained in Annex 4; the market maker should also notify Consob without delay the termination of market making on the shares.

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4. The provisions of article 114, paragraph 7 of the Consolidated Law, shall not apply if the relevant persons or persons closely related to them are required to notify the operations carried out under Article 19 of Regulation (EU) No. 596/2014.

Art. 152-g

(Procedures and time limits for notifications to Consob and to the public)

1. Relevant persons shall inform Consob and publish the transactions in shares and related financial instruments, carried out by them or by persons closely related by the end of the fifteenth day of the month following the month in which the transaction was effected. 2. The communication to the public provided for by paragraph 1 may be carried out, on behalf of the relevant subjects indicated therein, the listed issuer, provided that, by prior arrangement, these subjects may send relevant information indicated in paragraph 1 listed issuer within the terms contained therein. In this case, the listed issuer publishes the information by the end of the trading day following the date on which it received the information from such relevant persons.
3. The communication to Consob provided by paragraph 1 may be carried out, on behalf of all the relevant persons, by the listed issuer within the time limits indicated in paragraph 2.
4. The communications are carried out according to the indicated in Annex 6 mode.
5. Listed issuers must identify the person responsible for receiving, managing and disclosing to the market of the information provided for in this Title.
6. Relevant persons shall inform persons closely related to whether the conditions under which these latter are subject to the reporting obligations under Article 114, paragraph 7 of the Consolidated Law.

Art. 15 Commission Regulation (EU) 679/2016

(Code


Chapter III

RIGHTS


Art. 15

(Right of access of)

1. The individual has the right to obtain from the data controller confirmation as to whether or not the current processing of personal data concerning him and, if so, to gain access to personal data and to the following information:

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- a) the purpose of treatment;
 - b) the categories of personal data in question;
 - c) the recipients or categories of recipients to whom the personal data are or will be sent, especially if recipients in third countries or international organizations;
 - d) when possible, the period of retention of personal data provided or, if not possible, the criteria used to determine that period;
 - e) the existence of the subject's right to request the data controller correct or delete personal data or restriction of the personal data concerning him or to object to their treatment;
 - f) the right to complain to a supervisory authority;
 - g) when data are not collected from the person concerned, all available information about their sources;
 - h) the existence of an automated decision-making process, including the profiling of Article 22, paragraphs 1 and 4, and, at least in these cases, significant information on the logic used, as well as the importance and the anticipated consequences of such treatment for 'interested.
2. Where personal data are transferred to a third country or an international organization, the person has the right to be informed of the existence of adequate safeguards in accordance with Article 46 relating to the transfer.
 3. The holder provides a copy of the personal data undergoing processing. If further copies required by the person concerned, the data controller may charge a reasonable fee which based on administrative costs. If the person concerned presents the request by electronic means, and the person concerned unless otherwise stated, the information is provided in an electronic format in common use.
 4. The right to obtain a copy referred to in paragraph 3 shall not affect the rights and freedoms of others.

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