

Eurotech S.p.A.

**Procedure for the Internal Management of Material Information and Inside Information
and the Public Disclosure of Inside Information**

*This document has been translated into English
for the convenience of readers outside Italy.
The original Italian document should be considered
the authoritative version.*

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REGULATORY FRAMEWORK

For the purposes of this procedure (the “Procedure”), the following regulatory framework has been taken into account:

- Regulation (EU) No. 596/2014 of the European Parliament and of the Council of the European Union of April 16, 2014, on market abuse (*Market Abuse Regulation*—hereinafter “MAR”), as last amended by Regulation (EU) No. 2024/2809 (“**Listing Act**”);
- Commission Implementing Regulation (EU) 2016/1055 of June 29, 2016 (“**ITS 1055**”);
- Delegated Regulation (EU) 2026/789 (“**Regulation 2026/789**”), which supplements the MAR with regard to the disclosure of inside information in protracted processes and delayed disclosure;
- Legislative Decree No. 58/1998, as subsequently amended (the “TUF”);
- the “*Guidelines on the Market Abuse Regulation (MAR) – Delayed Public Disclosure of Inside Information*” published by ESMA (*European Securities and Markets Authority*) and adopted by Consob, which has also made them available on its official website (“**ESMA Guidelines on Delayed Disclosure**”);
- Guidelines No. 1/2017 on “*Management of Inside Information*” adopted by Consob on October 13, 2017 (the “Guidelines”).

This Procedure must be applied and interpreted in accordance with the guidelines of ESMA—the *European Securities and Markets Authority* (including the *Questions and Answers on the Market Abuse Regulation*, prepared and updated by ESMA itself, in the latest version available on its official website) and of Consob, to the extent of their respective jurisdictions.

INTRODUCTION

This procedure (the “Procedure”) is adopted by Eurotech S.p.A. (the “Company” or the “Issuer”) in accordance with the provisions of Article 17 of MAR and ITS 1055, and governs the rules and procedures relating to both the internal management and the external disclosure of Inside Information and Material Information (both as defined below) concerning the Issuer and its subsidiaries pursuant to Article 93 of the TUF (the “Subsidiaries” and, together with the Company, the “Group”).

The Procedure is intended to: (i) ensure compliance with applicable laws and regulations on the matter; and (ii) guarantee the strictest confidentiality and secrecy of Inside Information and Material Information; The Procedure is intended, among other things, to ensure greater transparency toward the market and adequate preventive measures against market abuse and, in particular, against the misuse of Inside Information.

The following are required to comply with this Procedure, with varying levels of responsibility and obligations: Directors, Statutory Auditors, General Managers (if appointed), Executives, and Employees of the Company and/or Group companies, as well as “external” parties listed in the “Register of Persons with Access to Material Information” (the “RIL”) or in the “Register of Persons with Access to Inside Information” (the “Insider Register”) who, for any reason, have access—as applicable—to Material Information and/or Inside Information concerning the Issuer and its Group (collectively, the “Recipients”). The RIL and the Insider Register are governed by the procedure entitled “Procedure for the Management of the Register of Persons with Access to Material Information and Inside Information” adopted by the Company and attached hereto (see Annex “A”).

This Procedure does not govern the management of advertising and commercial information that does not constitute Material Information and/or Inside Information within the meaning of the Procedure; such information is therefore disclosed through means other than those covered by this Procedure.

This Procedure, effective as of July 3, 2016, was last updated on August 5, 2026. Any subsequent amendments and/or additions shall take effect on the date of publication of the Procedure on the Company’s website, or on such other date as may be provided for by law or regulation, or by resolution of the Board of Directors, or, in cases of urgency, by the Chairman of the Board of Directors or the Chief Executive Officer.

1. PROVISIONS CONCERNING MATERIAL INFORMATION

1.1 Definition of Types of Material Information and Material Information

For the purposes of this Procedure, “*types of material* information” means those types of information that the Issuer considers material because they relate to data, events, projects, or circumstances that—whether on a continuous, repetitive, periodic, or sporadically, occasionally, or unexpectedly, directly concern the Company and that may, at a later—even imminent—time, take on the nature of inside **information** (the “**Types of Material** Information”).

For the purposes of this Procedure, “*material* information” means a single piece of information that falls within the Types of Material Information and that, in the Issuer’s judgment, is in fact material in that it may—at a later, even imminent, time—become inside **information** (the “**Material** Information”). Individual items of Material Information primarily arise from activities carried out by the Company or its Subsidiaries and include (i) information received from external sources that is material in nature; and (ii) information held by the Issuer or its Subsidiaries that is material in nature when combined with publicly available information.

1.2 Mapping of Types of Material Information

The identification and monitoring of Types of Material Information fall under the responsibility of the so-called “Insider Information Management Function” (the “FGIP”), which, for the purposes of this Procedure, is assigned to the Chief Executive Officer, who is assisted by *the Group Chief Financial Officer* and *the Investor Relations Manager* in carrying out the activities falling under the FGIP’s purview.

The FGIP develops the classification of Types of Material Information with the assistance of the functions or organizational units identified by the Issuer with respect to each Type of Material Information and involved, in various capacities, in the handling of Material Information and/or Inside Information (as defined *below*) (the “**Competent** Functions”).

Appendix “B” contains a list of the Types of Material Information identified by the Company and the Authorized Departments that normally have access to each Type of Material Information. With regard to the Types of Material Information that relate to lengthy processes that typically take place in multiple phases, the FGIP, with the support of the Relevant Departments, may identify, for each phase, the Relevant Departments that normally have access to such information. The FGIP, with the support of the Relevant Departments, ensures that the list of Types of Material Information is kept up to date.

1.3 Identification and Management of Material Information

The Competent Functions pay particular attention to the stage of development of information falling under the Types of Material Information.

If a piece of information can be classified as Material Information (taking into account any criteria the Company has established for such classification), the Competent Functions shall promptly notify the FGIP, indicating in writing the reasons why they believe the information constitutes Material Information. To this end, they complete the appropriate form prepared in accordance with the template set forth in Annex “C” to this Procedure. The FGIP is required to maintain a record of such notification and may request any additional information deemed necessary.

Following the aforementioned notification, the FGIP promptly conducts its own assessment of the material nature

of the information, taking into account the reasons indicated by the Competent Departments and any criteria the Company has established for the purposes of said assessment.

Once the material nature of a piece of information has been verified, the FGIP shall ensure that:

- (i) a record of such assessment is maintained using a technical tool that ensures the accessibility, legibility, and preservation of the information on a durable medium;
- (ii) appropriate measures (barriers) are adopted to segregate Material Information, i.e., to prevent individuals (whether internal or external to the Company) who are not required to access it in the normal course of their professional activities or duties—that is, individuals who have no need to know the Material Information and whose involvement is not necessary with respect to the specific Material Information—from gaining access to it;
- (iii) individuals who have access to Material Information are registered in the RIL. To this end, the FGIP shall immediately notify the Person Responsible for maintaining the RIL so that the latter may: (i) establish a specific section of the RIL pertaining to Material Information and register in said section the individuals who have access to such Material Information; as well as (ii) notifying the registered individuals of the need to ensure the confidentiality of the Material Information through scrupulous compliance with the rules of conduct described in Article 5.1 (where applicable), as well as, in general, the obligations arising from the possession of Material Information pursuant to the Procedure;
- (iv) ensure appropriate coordination for the purpose of *the Investor Relations Manager* and the *Group Chief Financial Officer* drafting a press release in accordance with paragraph 3.2 of the Procedure below.

The FGIP, with the support of the relevant departments as applicable, monitors Material Information and its progress.

If, based on the stage of development of a specific Material Piece of Information, it is reasonable to believe that it may soon become Inside Information (as defined *below*), the Relevant Departments shall notify the FGIP and the Chief Executive Officer (or, in the event of the latter's absence or inability to perform his duties, the Chairman of the Board of Directors), before deciding on the privileged nature of the information as set forth in paragraph 3.1 of the Procedure, shall take prompt action to assess whether the conditions exist to potentially trigger the Delay Procedure referred to in paragraph 4 of the Procedure.

It is understood that: (i) specific information included in the list of Types of Material Information may be immediately classified as Inside Information (as defined *below*) and that, in such a case, the provisions set forth in paragraphs 3 and 4 of the Procedure apply directly; (ii) if the Competent Functions believe that a specific piece of Relevant Information previously identified (or not yet identified as such) has acquired the characteristics of Inside Information (as defined in paragraph 2.1 below), they shall report this to the FGIP.

2. PROVISIONS CONCERNING INSIDE INFORMATION

2.1 Definition of Inside Information

For the purposes of this Procedure and in accordance with Article 7 of MAR, “*inside information*” means information of a precise nature that has not been made public, relating, directly or indirectly, the Company or its financial instruments, and which, if made public, could have a significant effect on the prices of such financial instruments or on the prices of related derivative financial instruments (**the “Inside Information”**).

Information is of a “specific nature,” within the meaning and for the purposes of Article 7, paragraph 2 of MAR, if it refers to a set of circumstances that exist or that can reasonably be expected to occur, or to an event that has occurred or that can reasonably be expected to occur, and if such information is sufficiently specific to allow conclusions to be drawn regarding the possible effect of that set of circumstances or that event on the prices of the financial instruments or the related derivative financial instrument.

In this regard, it should be noted that, in the case of a protracted process intended to bring about, or resulting in, a particular circumstance or event, such future circumstance or event—as well as the intermediate stages of that process that are linked to the bringing about or resulting in of the future circumstance or event—may be considered information of a precise nature.

An intermediate stage in a prolonged process is considered Inside Information if, in and of itself, it meets the criteria set forth in this article.

“Information that, if made public, would be likely to have a significant effect on the prices of financial instruments, derivative financial instruments (...)” means information that a reasonable investor would likely use as one of the factors on which to base their investment decisions.

2.2 Information that directly or indirectly concerns the Issuer

The Issuer shall disclose to the public, as soon as possible, any Inside Information that directly concerns said Issuer.

As specified in the Guidelines, the Issuer is therefore not required to disclose information that “indirectly” concerns the Company, such as, for example, information that, while affecting the prices of financial instruments issued by the Company, originates from parties external to the Issuer¹.

The Guidelines (i) provide certain examples of information that indirectly concerns an issuer and (ii) clarify that, following the publication of information that indirectly concerns the Issuer, Material Information that was not previously considered Inside Information by the Issuer may, conversely, take on that character. The examples of the types of information referred to in points (i) and (ii) above, as set forth in the Guidelines, are reproduced in Annex “D” to this Procedure, to which reference is made.

2.3 Relationships with Subsidiaries

The Issuer discloses to the public information concerning its Subsidiaries if such information constitutes Inside Information for the Issuer itself.

In order to fulfill this obligation, the Subsidiaries shall promptly transmit to the Issuer the necessary information in accordance with the instructions provided by the Issuer pursuant to Article 114, paragraph 2, of the TUF.

3. HANDLING OF INSIDE INFORMATION

The Issuer discloses to the public, as soon as possible, Inside Information that directly concerns the Issuer, in accordance with the terms and procedures specified in paragraph 3.2 below.

When disclosing Inside Information to the public, the Issuer shall ensure that such disclosure is made (i) in a

¹ Section 4.2.1 of the Guidelines.

manner that allows for rapid, free, and non-discriminatory access simultaneously throughout the European Union, as well as a complete, accurate, and timely assessment of the Inside Information by the public, and, in any case, (ii) in compliance with the provisions of ITS 1055; all in accordance with the provisions of this Article 3 of the Procedure.

Pursuant to the provisions of Article 17, paragraph 8, of MAR, when the Company—or a person acting in its name or on its behalf—discloses Inside Information to third parties, in the normal course of a business, profession, or function, it is required to disclose such information fully and effectively to the public, simultaneously in the case of intentional disclosure and promptly in the case of unintentional disclosure, unless the person receiving the Inside Information is subject to a duty of confidentiality, regardless of whether such duty is of a legislative, regulatory, statutory, or contractual nature.

The Company may, under its own responsibility, delay the public disclosure of Inside Information (the “Delay”) if the conditions set forth in Article 4 of the Procedure are met.

3.1 Assessment of the Inside Information Status

The assessment of whether information constitutes Inside Information—and, consequently, whether a disclosure to the market is required pursuant to this Article (or, if the conditions set forth in applicable law are met, whether the Delay procedure referred to in Article 4 may be initiated)—shall be conducted as promptly as possible, taking into account the characteristics of the Inside Information, in accordance with the procedures set forth below.

Upon receipt of the report referred to in paragraph 1.3 above of the Procedure—regarding the possibility that a single piece of Material Information may soon become Inside Information, or that a specific piece of Material Information previously identified (or not yet identified as such), has acquired the characteristics of Inside Information—the Chief Executive Officer (or, in the event of the latter’s absence or inability to act, the Chairman of the Board of Directors, after consulting, if necessary, with the *Investor Relations Manager* and/or the *Group Chief Financial Officer*) shall promptly assess whether the information constitutes Inside Information. It is understood, in any case, that these individuals, if deemed necessary or appropriate, have the authority to refer the assessment to the collective decision-making authority of the Board of Directors, which must in such a case convene as soon as possible.

If, following the aforementioned assessment, the Chief Executive Officer (or, in the event of his absence or inability to act, the Chairman of the Board of Directors or the Board of Directors) determines that the information is privileged, he shall complete the form set forth in Annex “E” of the procedure and:

- (i) takes steps to ensure that Inside Information is disclosed to the public in accordance with the provisions of paragraph 3.2 of the Procedure below, unless the conditions for triggering the Delay Procedure referred to in Article 4 are met;
- (ii) immediately informs the Person Responsible for maintaining the RIL and the Insider Register so that the latter may: (a) establish a specific Single Section relating to the Inside Information and, if an RIL has already been established, close the RIL; and (b) to enter in the aforementioned Single Section of the Insider Register the persons who have access to said Inside Information. If the conditions for triggering the Delay Procedure referred to in Article 4 are not met, the persons who had access to the Inside Information during the period between the time the information was classified as inside information and the time it was published² will

² Section 5.2.2 of the Guidelines.

be entered in the Single Section.

For information that becomes privileged in an unforeseeable manner, the assessment referred to in this paragraph 3.1 shall be carried out as soon as possible after the privileged nature of the information has been ascertained³.

As specified in the Guidelines⁴:

- (a) in cases where information becomes inside information at a foreseeable time, particularly for information originating internally within the Issuer, the Issuer takes proactive steps in advance to reduce the technical time required for publication. Specifically, the Company prepares a draft press release and ensures that the persons involved in the publication process, as set forth in the preceding paragraphs, are ready to fulfill the relevant obligations;
- (b) in cases where information becomes inside information at an unforeseeable time or, in any event, very quickly, the timeframe “as soon as possible” referred to in Article 17, paragraph 1, of MAR includes the time necessary for the (rapid) assessment of whether or not to delay the publication itself, provided the conditions for such a delay exist.

3.2 Public Disclosure of Inside Information

As noted above, when disclosing Inside Information to the public, the Issuer ensures that the disclosure is made (i) in a manner that allows for rapid, free, and non-discriminatory access simultaneously throughout the European Union, as well as a complete, accurate, and timely assessment of the Inside Information by the public, and, in any case, (ii) in compliance with the provisions of ITS 1055 (iii) as well as in accordance with the provisions of this Procedure and the *applicable* regulations in force *at the time*. In any case, the Company does not combine the public disclosure of Inside Information with the marketing of its own activities.

The disclosure of Inside Information to the public must take place as soon as possible, through the release of a specific press release prepared by the Issuer in accordance with the provisions set forth *below*, taking into account the press release templates contained in the Instructions to the Regulations Governing Markets Organized and Managed by Borsa Italiana S.p.A., to the extent applicable.

The Investor Relations Manager and the Group Chief Financial Officer shall jointly draft the text of the press release, sharing it, where appropriate, with the relevant corporate departments on a case-by-case basis, so as to allow those departments, within their respective areas of expertise, to assess the substance, content, and compliance with the drafting criteria of the press release.

The text of the draft press release must be submitted to the Chief Executive Officer—or, in the event of his absence or inability to act, to the Chairman of the Board of Directors—and, if deemed appropriate or necessary, to the Board of Directors, for final approval prior to external dissemination, subject to certification, if the text relates to accounting disclosures, by the Officer Responsible for the Preparation of Corporate Accounting Documents (the “Officer Responsible”) pursuant to and for the purposes of Article 154-bis of the TUF.

³ Section 6.1.2 of the Guidelines.

⁴ Section 7.1 of the Guidelines.

As specified in the Guidelines⁵ :

- (a) The disclosure must take place within the time frame necessary to draft the press release, so as to allow the public to fully and accurately assess the Inside Information and to enable its subsequent transmission to the SDIR system used by the Company to disseminate *Regulated Information* (the “SDIR”)⁶ ;
- (b) Any internal organizational issues, such as the absence of substitutes for the persons who are supposed to make the decision or who are supposed to handle the disclosure, cannot justify an extension of said timeframe;
- (c) in order to enable Consob and the market operator to promptly carry out their respective supervisory activities, the Issuer shall notify Consob in advance—including through informal channels and with sufficient lead time—of the possibility that Inside Information of particular significance may be disclosed to the public while the financial instruments are being traded. A similar notice shall be provided to the market operator in accordance with market rules.

The press release is entered into the SDIR system and, through the SDIR, is transmitted to Consob, Borsa Italiana S.p.A., and the news agencies connected to the system⁷ .

The press release is considered public as soon as confirmation of its receipt is received from the SDIR system. In the event of operational malfunctions and/or service interruptions in the SDIR system, disclosure obligations to Borsa Italiana S.p.A. are fulfilled by sending the press release to the *email* address specified in the Instructions to the Regulations for Markets Organized and Managed by Borsa Italiana S.p.A.⁸ .

In any case, the Issuer ensures the completeness, integrity, and confidentiality of Inside Information by promptly remedying any deficiency or malfunction in its communication. The press release is also sent to the authorized storage mechanism used by the Company for maintaining *Regulated Information*.

The Investor Relations Manager, the Head of Corporate Communications, or the Group Chief Financial Officer shall ensure that the press release is uploaded to the Company’s *website* by the departments designated

⁵ Section 7.1 of the Guidelines.

⁶ If the information becomes inside information on Friday after the markets close, for the purposes of ensuring proper timing of disclosure, the issuer does not take into account the fact that the markets will be closed over the weekend. This is also in light of the possibility that OTC transactions may be concluded (see Section 7.1.6 of the Guidelines).

⁷ Pursuant to Article 2, paragraph 1, subparagraph (b), of ITS 1055, “Issuers (...) shall disclose inside information using a technical means that allows for: (...) (b) communicating the inside information, directly or through third parties, to media outlets on which the public reasonably relies for the effective dissemination of such information. The disclosure shall be made via an electronic medium that ensures the completeness, integrity, and confidentiality of the information during transmission and clearly indicates: i) the inside information nature of the disclosed information; (ii) the identity of the issuer or the emissions allowance market participant: full corporate name; (iii) the identity of the notifier: first name, last name, position at the issuer or the emissions allowance market participant; (iv) the subject matter of the inside information; (v) the date and time of the disclosure to the media.”

⁸ The Instructions to the Regulations for Markets Organized and Managed by Borsa Italiana S.p.A. stipulate that, in such cases, the press release must be sent to the following *email* address: info.lcs@borsaitaliana.it.

for this purpose, guaranteeing (i) that non-discriminatory and free access is ensured; (ii) that the Inside Information is published in an easily identifiable manner in *the “Investor News” section of the website*; (iii) the indication of the date and time of publication of the Inside Information and the chronological ordering of the Inside Information; all in compliance with the principles set forth in Article 5 below, where applicable.

The Company shall retain on its *website*, for a period of at least 5 years, all Inside Information that it is required to disclose to the public.

3.3 Inside Information Relating to Prolonged Processes

Pursuant to Article 17(1) of the MAR, the Issuer’s obligation to disclose Inside Information to the public as soon as possible does not apply to Inside Information relating to intermediate stages of a protracted process, provided that such stages are linked to the materialization or determination of specific circumstances or a specific event.

In the case of a prolonged process, only the final circumstances or the final event must be disclosed to the public as soon as possible after they occur. A non-exhaustive list of final events or final circumstances in prolonged processes subject to the disclosure obligation is provided in Annex I of Regulation 2026/789.

3.4 Disclosure of Information at Shareholders’ Meetings, Press Conferences, or Meetings with Financial Analysts or Trade Union Representatives

The disclosure of Inside Information during a shareholders’ meeting of the Issuer triggers the obligation to disclose such information to the public in accordance with the procedures set forth in Article 3.2.

If the Issuer or another Group company organizes or participates in meetings attended by financial analysts, institutional investors, or other financial market participants, *the Investor Relations Manager* shall:

- (a) notify Consob and the market operator in advance of the date, location, and main topics of the meeting;
- (b) submit to Consob and the market operator, via the SDIR system or in accordance with alternative procedures established by the competent authority, the documentation made available to meeting participants, no later than the time the meetings are held;
- (c) to extend participation in the meeting to representatives of the business press as well; or, if this is not possible, to publish, in accordance with the procedures set forth in paragraph 3.2, a press release outlining the main topics discussed⁹.

It is understood that during the aforementioned meetings, the Issuer shall not disclose Inside Information to participants unless such information has been disclosed to the public in accordance with the procedures set forth in paragraph 3.2—simultaneously in the case of intentional disclosure and promptly in the case of unintentional disclosure.

In the event that the Issuer participates in meetings with representatives of labor unions during which data regarding the company’s prospects are discussed, if the union delegations have not entered into any confidentiality agreement, the Issuer will disclose to the public any Inside

⁹ Paragraph 7.9.1 of the Guidelines.

Information discussed therein at¹⁰.

4. DELAY IN DISCLOSURE

4.1 Conditions for Delay

The Company may, under its own responsibility, delay the public disclosure of Inside Information, provided that all of the following conditions (the “**Conditions for Delay**”) are met:

- (a) immediate disclosure would likely prejudice the Issuer’s legitimate interests;
- (b) the Inside Information whose disclosure is to be delayed does not conflict with the most recent information disclosed to the public or with any other communication made by the Issuer regarding the same matter to which the Inside Information relates¹¹ ;
- (c) the Issuer is able to ensure the confidentiality of such information.

In the case of a protracted process, only the final circumstances or event must be disclosed, as soon as possible after they occur, if such stages are linked to the materialization or determination of specific circumstances or a specific event. Failure to publicly disclose Inside Information relating to intermediate stages of a prolonged process as referred to in Article 3.3 above does not require the activation of the Delay provisions set forth in this paragraph and is not subject to the obligations provided therein.

4.2 Procedure for Implementing the Delay in Public Disclosure of Inside Information

As indicated in Article 3.1 above, the assessment regarding the authority to delay the public disclosure of Inside Information is conducted on a case-by-case basis under the direct responsibility of (i) the Chief Executive Officer, or, in the event of his or her absence or inability to act, the Chairman of the Board of Directors, or (ii) if deemed appropriate or necessary, the Board of Directors.

To this end, (i) the Chief Executive Officer or, in the event of his absence or inability to perform his duties, the substitute indicated above, or (ii) if deemed appropriate or necessary, the Board of Directors shall verify whether the Conditions for Delay are met, taking into account, in any case, the provisions contained in the ESMA Guidelines on Delay, and shall complete the appropriate form prepared in accordance with the template set forth in Annex “F” (Sections I and II) to this Procedure. Once the existence of the Conditions for Delay has been verified, the aforementioned form is filed at Eurotech’s registered office at Via Fratelli Solari 3/A – 33020 Amaro (UD), together with any additional documents on which the assessment was based and which attest to the reasons for the Delay. This form must include all the elements required by ITS 1055 for the proof and notification of the Delay, as specified below.

For the delay in the disclosure of Inside Information, the Issuer uses technical tools that ensure the accessibility, legibility, and storage on a durable medium of the information required by Article 4, paragraph 1, of ITS 1055, as set forth below:

¹⁰ Paragraph 6.5.8 of the Guidelines.

¹¹ Annex II of Regulation 2026/789 contains a non-exhaustive list of situations in which inside information conflicts with the most recent information disclosed to the public or with any other type of disclosure referred to in Article 17(12)(b) of the MAR.

(A) date and time: **(i)** of the first occurrence of the Inside Information at the Issuer; **(ii)** of the decision to delay the disclosure of the Inside Information; **(iii)** of the expected disclosure of the Inside Information by the Issuer;

(B) the identities of the persons at the Issuer who are responsible for: **(i)** making the decision to delay disclosure and the decision establishing the start of the Delay Period and its probable end; **(ii)** continuously monitoring the Conditions for the Delay; **(iii)** for making the decision to disclose the Inside Information to the public; **(iv)** for providing the competent authority with the information required for the Delay and a written explanation;

(C) evidence of initial compliance with the Conditions for the Delay and of any changes thereto that occurred during the Delay Period, including: **(i)** protective barriers established both internally and externally to prevent access to Inside Information by persons other than those within the Issuer who need to access it in the normal course of their professional activities or duties; **(ii)** procedures in place to disclose the Inside Information as soon as possible once its confidentiality can no longer be guaranteed.

The Chief Executive Officer or, in the event of his or her absence or inability to perform duties, the substitute indicated above—subject to compliance with the requirements set forth in Article 4, paragraph 1, ITS 1055 referred to above—shall take any measures deemed appropriate, in the specific case and taking into account the type of Inside Information, as well as the electronic and/or paper format of the document in which it is contained, to ensure the delayed disclosure of the Inside Information and the maintenance of its confidentiality, all while also taking into account the provisions of Article 5 of the Procedure.

The Issuer implements a set of measures (barriers) designed to segregate Inside Information, that is, to prevent individuals (whether internal or external to the Company) who are not required to access it in the normal course of their professional activities or duties—that is, individuals who have no need to know the Inside Information—from gaining access to it¹².

4.3 Conduct of the Issuer During the Delay

- (a) During the Delay, the Chief Executive Officer or, in the event of his or her absence or inability to perform duties, the substitute indicated above, monitors on a case-by-case basis—with the support of the person indicated in the documents filed pursuant to paragraph 4.2—whether the Conditions for the Delay continue to be met and, in particular, the confidentiality of the Inside Information whose disclosure has been delayed.

The Issuer shall prepare in advance a draft public announcement to be released in the event that the monitoring reveals that any of the Conditions for Delay have ceased to exist¹³.

If it is determined that even one of the Conditions for Delay has ceased to apply, (i) the Inside Information must be disclosed to the public as soon as possible, in accordance with the procedures set forth in Article 3 of this Procedure, and (ii) immediately following the public disclosure, the Company must make the notification referred to in paragraph 4.4 below.

Confidentiality is also deemed to have ceased to exist if a rumor explicitly refers to Inside Information

¹² Paragraph 5.1.2 of the Guidelines.

¹³ Paragraph 6.7.2 of the Guidelines.

whose disclosure has been delayed, when such a rumor is sufficiently accurate to indicate that the confidentiality of such information is no longer guaranteed (as provided in Article 17, paragraph 7, of MAR).

If the Issuer has a share buyback program in place pursuant to Article 5 of MAR (the “**Buyback Program**”), and without prejudice, in any case, to the scenario in which the conditions set forth in Article 4, paragraph 2, of Delegated Regulation (EU) 2016/1052 to continue the Buyback Program, following the decision to delay the publication of Inside Information, the *Investor Relations Manager* shall inform the competent authorities regarding share buybacks that the conditions for operating under the exemption provided for by MAR¹⁴ have ceased to exist until the conclusion of the delay procedure¹⁵. If the Issuer has suspended the ongoing Buyback Program, the *Investor Relations Manager* notifies the department responsible for share buybacks that the conditions have been restored, allowing operations to resume under the exemption provided for by MAR¹⁶.

- (b) During the Delay, the Issuer shall not disclose information that is inconsistent with the information subject to the Delay¹⁷.

4.4 Notification of the Delay

When the disclosure of Inside Information has been delayed pursuant to this Article 4, the Company, immediately after the Inside Information has been disclosed to the public, shall notify the competent authority of such delay (in accordance with the procedures established by that authority) and shall provide in writing the information required by ITS 1055, submitting to Consob the form set forth in Annex “F” (Sections I and III) via certified email to the address consob@pec.consob.it¹⁸

Pursuant to Article 4, paragraph 3, of ITS 1055, the notification of the delay to Consob must include the following information:

- (A) identity of the Issuer: full corporate name;
- (B) identity of the notifying party: first name, last name, position at the Issuer;
- (C) the notifier’s contact information: business email address and phone number;
- (D) identification of the Inside Information subject to the delay in disclosure: (i) title of the disclosure announcement; (ii) reference number, if assigned by the system used to disclose Inside Information; (iii) date and time of the public disclosure of the Inside Information;
- (E) date and time of the decision to delay the disclosure of the Inside Information;
- (F) the identities of all persons responsible for the decision to delay the disclosure of the Inside Information to the public.

¹⁴ See Article 4(1)(c) of Delegated Regulation (EU) 2016/1052.

¹⁵ Sections 6.6.2 and 6.8.4 of the Guidelines.

¹⁶ Paragraphs 6.6.2 and 6.8.4 of the Guidelines.

¹⁷ Section 6.4.2 of the Guidelines.

¹⁸ The recipient must be specified as “Markets Division,” and the subject line must begin with “MAR Delayed Reporting.”

Where required by Consob, an explanation of how the Conditions for Delay were met shall also be submitted to that Authority by sending the form set forth in Annex “F” (Section II).

Notification is not required if, after the decision to delay publication, the information is not disclosed to the public because it has lost its privileged status¹⁹.

5. GENERAL PRINCIPLES FOR THE DISCLOSURE OF INFORMATION RELATING TO THE ISSUER

5.1 Material Information and Inside Information

The Issuer restricts and controls access to Material Information and Inside Information by ensuring the organizational, physical, and logical security of such information, including through the establishment of different access levels, the protection of related IT media (passwords, encryption, etc.), and the imposition of limits on the circulation of data and documents²⁰.

Those subject to this Procedure are required to:

- (a) keep confidential the documents and Relevant and Inside Information obtained in the course of their duties;
- (b) use the aforementioned information and documents exclusively in the performance of their duties;
- (c) strictly comply with the provisions contained in this Procedure.

Each Recipient is personally responsible for safeguarding the documentation pertaining to Material Information and/or Inside Information entrusted to them. Documentation pertaining to Material Information and/or Inside Information must be stored by the Recipient—including in electronic format—in such a way as to allow access only to authorized persons. If a Recipient must transmit documents or information pertaining to Material Information and/or Inside Information to third parties in the normal course of their professional activities or duties, they must ensure that such third parties are bound by a duty of confidentiality regarding the documents and information received, regardless of whether such duty is of a legislative, regulatory, statutory, or contractual nature.

Any communication by the Recipient with the press or other media, intended to disclose company information, must take place exclusively through the *Investor Relations Manager*, who must obtain authorization from the Chief Executive Officer. In any case, if the documents and information contain references to economic, balance sheet, financial, investment, personnel, or similar data, such data must be validated in advance by the Designated Officer.

It is understood that the provisions of Article 3 of the Procedure shall apply to the public disclosure of Inside Information.

5.2 Disclosure via the Website

In order to ensure that investors are properly informed, the Issuer takes the following criteria into account when using its *website*:

¹⁹ Section 6.8.2 of the Guidelines.

- (i) it presents data and news in accordance with appropriate editorial standards, avoiding, in particular, promotional purposes;
- (ii) clearly indicates, on each web page, the date and time the information was updated;
- (iii) ensures that the content of documents written in English is identical to that of documents written in Italian, highlighting any differences if this is not the case, and provided that the Italian version remains the authoritative text;
- (iv) publishes, as soon as possible, a correction notice highlighting the changes made, in the event of errors in the information published on *the website*;
- (v) cites the source of the information when publishing data and/or news prepared by third parties;
- (vi) mentions in the press release any documents related to the events described in the press release that may be published on *the website*;
- (vii) make documents available to the public via the Internet, preferably in their full version, or ensure that any summary faithfully reflects the content of the original document;
- (viii) indicates, with regard to documents published on *the website*, whether they are the full text, an excerpt, or a summary, and in any case specifies how to access the documents in their original format;
- (ix) provides any links to other *websites* in accordance with the principles of fairness, neutrality, and transparency, so that users can easily determine which other *website* they are visiting;
- (x) indicates the source and the actual time at which data on prices and trading volumes of any financial instruments reported were collected;
- (xi) allows free access to the website, ensuring—even when the pages are managed by third parties—that access is not conditioned on investors' prior provision of data or information;
- (xii) in discussion *forums* with investors, exercises the utmost caution in its contributions so as not to distort the level playing field of information.

In order to ensure accurate and complete information for shareholders, the Company will, in all cases, comply with any recommendations issued on this matter by the competent authority.

The same principles aimed at ensuring accurate information apply, to the extent compatible, to *the websites* of other Group companies, for which the respective companies are responsible.

6. AMENDMENTS AND ADDITIONS

- 6.1 The provisions of this Procedure shall be updated and/or supplemented by the Issuer's Board of Directors, at its own expense, taking into account applicable laws or regulations, as well as practical experience and market practices that may arise in this regard.
- 6.2 Should it be necessary to update and/or supplement individual provisions of this Procedure as a result of changes in applicable laws or regulations, or specific requests from supervisory authorities, as well as in cases of proven urgency, this Procedure may be amended and/or supplemented by the Chairman of the Board of Directors or the Chief Executive Officer, with subsequent ratification of the amendments and/or supplements by the Board of Directors at its next meeting.

* * *

Appendix “A” *“Procedure for Managing the Register of Persons with Access to Material Information and Inside Information.”*

Appendix “B”: List of Types of Material Information.

Appendix “C”: Form for Competent Functions for the Classification of Types of Relevant Information.

Appendix “D”: Illustrative and non-exhaustive list of information that indirectly concerns an issuer.

Appendix “E”: Form for Identifying Inside Information.

Appendix “F”: Form for triggering and reporting a delay.

APPENDIX B

ILLUSTRATIVE LIST OF TYPES OF MATERIAL INFORMATION

Types of Material Information:

information pertaining to:

- Ownership Structures
- *Management* Composition
- *Management* incentive plans
- Auditors' Activities
- Capital Transactions
- Issuance of Financial Instruments
- Characteristics of the Financial Instruments Issued
- Acquisitions, Mergers, Spin-offs, etc.
- Restructuring and Reorganization
- Transactions involving financial instruments, *buybacks*, and *accelerated book-building*
- Insolvency Proceedings
- Legal Disputes
- Revocation of Bank Credit Lines
- Write-downs / Revaluations of assets or financial instruments in the portfolio
- Patents, licenses, rights, etc.
- Insolvencies of major debtors
- Destruction or damage to uninsured property
- Purchase or sale of *assets*
- Operating performance
- Changes in expected period financial results (*profit warnings* and *earnings surprises*)
- Receipt or Cancellation of Major Orders
- Entry into (or exit from) new markets
- Changes to investment plans
- Dividend distribution *policy*

Competent Functions:

Legal Department
 HR Department
 HR Department
 Administration and Control Department / Administrative Manager
 Administration and Control Department / Administrative Manager
 Administration and Control Department
 Administration and Control Department
 Administration and Control Department / M&A Function
 Administration and Control Department
 Administration and Control Department
 Administration and Control Department / Administrative Manager
 Administration and Control Department / HR Office / Administrative Manager / Legal Department
 Administration and Control Department / Administrative Manager / Treasury
 Administration and Control Department / Administrative Manager / Treasury
 Marketing / Patent Office
 Administration and Control Department / Administration Office
 Administration Department / Insurance Manager
 Purchasing Department / Administration Department
 Administration and Control Department / Administrative Manager
 Administration and Control Department / Administrative Manager / Controller
 Sales Department
 Sales Department / Product Management / Marketing
 Administration and Control Department / Administrative Manager
 Administration and Control Department

APPENDIX C

[on Eurotech letterhead]

**FORM FOR COMPETENT FUNCTIONS FOR THE QUALIFICATION
OF TYPES OF RELEVANT INFORMATION**

[Note: This form contains the main criteria and relevant factors to be considered by the Competent Departments when conducting their assessments regarding the classification of specific information included in the list of Types of Material Information as either “Material Information” or “Inside Information” pursuant to the Company’s relevant procedure.

Once completed and signed by the relevant Competent Function in each case, the form must be submitted to the FGIP so that it may take it into account for the purposes of the assessments referred to in Article 1.3 of the Procedure]

* * *

DEFINITIONS

Subsidiaries: companies controlled by Eurotech pursuant to Article 93 of Legislative Decree 58/1998.

Eurotech or the Company: Eurotech S.p.A.

Competent Departments: the departments or organizational units within the Company that are involved, in various capacities, in the handling of Material Information and/or Inside Information.

Material Information: specific information that, in the Company’s judgment, may at a later time—even in the near future—become Inside Information as defined in Article 7 of the MAR and the Procedure.

Inside Information: information that qualifies as inside information pursuant to Article 7 of the MAR and the Procedure.

MAR: Regulation (EU) No. 596/2014 of the European Parliament and of the Council of the European Union of April 16, 2014, on market abuse (*Market Abuse Regulation*).

Procedure: the procedure entitled “*Procedure for the Internal Management of Material Information and Inside Information and the Public Disclosure of Inside Information*” adopted by the Company.

Types of Relevant Information: the types of information listed in Annex “B” to the Procedure.

* * *

Responsible Department	<i>[Note: Indicate the function or organizational unit of the Company involved in evaluating the specific information]</i>
Description of the Information	<i>[Note: Specify the specific information being evaluated (e.g., contract, project, acquisition, accounting data, etc.)]</i>
Type of Relevant	<i>[Note: Indicate which category of information listed in Annex B to the Procedure the specific information under review falls under (e.g., ownership</i>

Information	<i>structure, management composition, withdrawal from agreement schemes, etc.)]</i>
Characteristics of the Information	The information subject to evaluation: ☐ originates from the Company ☐ originates from the Subsidiary [<i>insert name of the Subsidiary</i>] ☐ was received from an external source and is material to the Company ☐ is information held by [<i>the Company / the Subsidiary</i>] and is material when considered in conjunction with publicly available information ☐ directly concerns the Company ☐ is not public ☐ is specific¹ ☐ is material (i.e., if made public, it could have a significant effect on the prices of the Company's financial instruments)² ☐ other characteristic: [<i>Note: Check the applicable box(es)</i>]
Material Information	☒ N/A ☐ ☐ [<i>Note: If the specific information qualifies as Material Information, check the box marked with the symbol "✓"; otherwise, check the box marked with "N/A"</i>]
Inside Information	☒ N/A ☐ ☐ [<i>Note: If the specific information qualifies as Inside Information, check the box marked with the symbol "✓"; otherwise, check the box marked "N/A"</i>]
Reasons for the Assessment	[<i>Note: Indicate the reasons why the Competent Department considers the specific information to be confidential or privileged (e.g., the Material Information concerns the acquisition of control of a third-party company).</i>] <i>Also indicate any relevant criteria the Company has established for the purpose of classifying the specific information as " " Material Information / Inside Information.]</i>
Measures Taken	[<i>Note: Indicate:</i>

	(i) the safeguards adopted to ensure the confidentiality of the specific information (e.g., adoption of specific contractual safeguards (such as confidentiality agreements), restricted access to documentation pertaining to the information in paper format (such as document classification) / in electronic format (such as access control systems using passwords and/or read privileges assigned only to authorized individuals)); (ii) any measures put in place to potentially disclose the specific information should its confidentiality no longer be guaranteed (e.g., preparation of a draft press release); (iii) any other measures adopted with respect to the specific information]
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_____, on _____

[Place and date of the assessment]

[Signature of the person who conducted the assessment and indication of their position]

* * *

For acknowledgment and confirmation:

on behalf of FGIP:

The Chief Executive Officer

_____, in _____

[Place and date]

The Group Chief Financial Officer

_____, on _____

[Place and date]

The *Investor Relations Manager*

_____, on _____

[Place and date]

¹ Information is of a “specific nature,” within the meaning and for the purposes of Article 7(2) of the MAR, if:

- it relates to a set of circumstances that exist or that can reasonably be expected to come into existence, or to an event that has occurred or that can reasonably be expected to occur, and if
- it is sufficiently specific to allow conclusions to be drawn regarding the possible effect of the aforementioned set of circumstances or the aforementioned event on the prices of financial instruments or the related derivative financial instrument.

In the case of a protracted process intended to bring about, or that results in, a particular circumstance or event, that future circumstance or event—as well as the intermediate stages of that process that are linked to the bringing about or resulting in of the future circumstance or event—may be considered information of a precise nature.

By way of example only and without limitation, information relating to an event or a series of circumstances that constitute an intermediate stage in a prolonged process may concern the status of contractual negotiations, provisionally agreed-upon contractual terms, the possibility of placing financial instruments, the terms under which such instruments are sold, the provisional terms for the placement of financial instruments, or the possibility that a financial instrument will be included in a major index or the removal of a financial instrument from such an index.

An intermediate stage of a protracted process is considered inside information if, in and of itself, it meets all the criteria set forth above for classifying information as inside information.

² “Information that, if made public, would be likely to have a significant effect on the prices of financial instruments” means information that a reasonable investor would likely use as one of the factors on which to base his or her investment decisions.

ANNEX D

ILLUSTRATIVE AND NON-EXHAUSTIVE LIST OF INFORMATION THAT INDIRECTLY CONCERNS AN ISSUER

A. Illustrative and non-exhaustive list of types of information that indirectly concern the issuer.

Information relating to:

- data and statistics released by public institutions
- upcoming publication of reports by *rating* agencies
- the upcoming publication of financial analysts' research reports
- investment recommendations and suggestions regarding the value of financial instruments
- central bank decisions on interest rates
- Government decisions regarding taxation, sector-specific regulations, debt management, etc.
- Decisions by public authorities and local governments
- decisions regarding changes to the rules governing the definition of market indices and, in particular, their composition
- decisions regarding the microstructure of trading venues, such as changes to the market segment in which the issuer's shares are traded, changes to trading procedures, or changes to *market makers* or *trading* conditions
- decisions by supervisory or antitrust authorities.

B. A non-exhaustive list of information indirectly concerning the issuer, the publication of which may cause material information that was not previously considered inside information by the issuer to become such.

If the government adopts a measure from which companies in the sector in which the issuer operates could benefit under certain conditions, the issuer may be the only party to know whether it already meets the specified conditions and the extent of the benefit.

If the *consensus* among financial analysts raises the issuer's valuation based on situations, facts, data, or expectations that the issuer knows to be unfounded, such information could become inside information.

If the manager of a stock index includes the issuer's financial instruments in the index, the issuer—considering that the information indirectly concerns it—shall not issue a press release, unless the information has a specific impact on the issuer's financial instruments that is not already known to the market.

APPENDIX E

FORM FOR IDENTIFYING INSIDE INFORMATION

[Company logo]

[Note: Once this document has been completed and signed by the person responsible for assessing whether the specific information constitutes inside information, it must be kept in a designated archive at the Company]

IDENTIFICATION OF INSIDE INFORMATION ⁽¹⁾

Subject:	<i>[Note: To be completed by specifying the subject of the Inside Information (e.g., contract/project/corporate or financial event/accounting data/announcement of lower-than-expected earnings, etc.)]</i>
Date and Time of the Inside Information:	<i>[Note: To be completed by specifying the date and time when the Inside Information first came into the Company's possession]</i>
Person responsible for assessing the privileged nature of the information:	<i>[Note: To be completed by specifying the identity and position of the person authorized to assess the privileged nature of the information in accordance with the provisions of the "Procedure for the Internal Management of Material Information and Inside Information and the Public Disclosure of Inside Information" adopted by the Company (e.g., the Chief Executive Officer)]</i>

_____, on _____

[Place and date of the assessment]

[Signature of the person who conducted the assessment and indication of the position held by that person (e.g., Chief Executive Officer)]

¹ For the definition of "inside information," see Article 7 of Regulation (EU) No. 596/2014 (Market Abuse Regulation) and Article 2 of the procedure titled "Procedure for the Internal Management of Material Information and Inside Information and the Public Disclosure of Inside Information" adopted by the Company.

ATTACHMENT F

Form for Activation and Notification of Delay

* * *

[on the Company's letterhead]

DELAY IN PUBLIC DISCLOSURE OF INSIDE INFORMATION

[Note: Sections I and II of this document, once completed and signed by the person authorized to assess whether to initiate the Delay procedure, must be filed at the location specified in the Company's "Procedure for the Public Disclosure of Inside Information" and retained in a designated archive at the Company.

It should also be noted that, pursuant to the provisions of Article 3.2 of the aforementioned Procedure, the person who has assessed the option to delay the public disclosure of Inside Information must immediately inform the person responsible for maintaining the Company's Insider Register of the initiation of the delay procedure so that the latter may open the appropriate "Individual Section" of the Register.

The notification of the Delay to Consob pertains to Section I and Section III (which will be completed once the information is disclosed to the public) but not to Section II, which will be sent to Consob only upon request]

* * *

DEFINITIONS

Conditions for the Delay: the conditions for the Delay referred to in Article 17, paragraph 4, of MAR and Article 3 of the Procedure.

Inside Information: information that qualifies as inside information pursuant to Article 7 of MAR and Article 1 of the Procedure.

ITS 1055: Commission Implementing Regulation (EU) 2016/1055 of June 29, 2016.

MAR: Regulation (EU) No. 596/2014 of the European Parliament and of the Council of the European Union of April 16, 2014, on market abuse (*Market Abuse Regulation*).

Procedure: the procedure entitled "*Procedure for the Public Disclosure of Inside Information*" adopted by the Company.

Delay: a delay in the public disclosure of Inside Information pursuant to the provisions of Article 17(4) of the MAR and Article 3 of the Procedure.

Company: Eurotech S.p.A., with registered office at Via Fratelli Solari 3/A – 33020 Amaro (UD).

* * *

SECTION I

ASSESSMENTS REGARDING THE DELAY

Inside Information Subject to the Delay:	<i>[Note: To be completed with a description of the Inside Information subject to the Delay (e.g., contract/project/corporate or financial event/accounting data/announcement of lower-than-expected earnings, etc.).]</i>
Date and time of the Inside Information:	<i>[Note: To be completed by specifying the date and time when the Inside Information first came into the Company's possession.]</i>
Date and time of the decision to delay the disclosure of the Inside Information:	<i>[Note: To be completed by indicating the date and time the decision was made to initiate the procedure for implementing the Delay.]</i>
Date and time of the expected disclosure of the Inside Information:	<i>[Note: To be completed by specifying the date and time of the Company's expected public disclosure of the Inside Information.]</i>
Person responsible for making the decision (i) to delay disclosure and (ii) to establish the start of the Delay period and its probable end:	<i>[Note: To be completed by specifying the identity and position of the person responsible for making the decision to delay disclosure and for determining the start and probable end of the Delay Period, in accordance with the provisions of the Procedure (e.g., the Chief Executive Officer or the Chairman of the Board of Directors).]</i>
Person Responsible for the Ongoing Monitoring of the Conditions for the Delay:	<i>[Note: To be completed by specifying the identity and position of the person responsible for continuously monitoring the Conditions for the Delay during the Delay Period.]</i>
Person responsible for making the decision to disclose the Inside Information to the public:	<i>[Note: To be completed by specifying, as applicable, the governing body or the identity and position of the person responsible for deciding to disclose the Inside Information subject to the Delay to the public.]</i>
Person responsible for providing Consob with the information required for the Delay and the written explanation:	First Name: [●] Last Name: [●] Position: [●] Phone number: [●] Email address: [●] <i>[Note: To be completed by indicating the first name, last name, and position held at the Company by the person responsible, pursuant to the Procedure, for disclosing Inside Information, who will be required to (i) provide Consob with the information required regarding the delay as specified in ITS 1055; and (ii) provide Consob with a written explanation regarding the delay in disclosing Inside Information .]</i>
Procedure for Notifying Consob	Immediately after the Inside Information subject to this delay

of the Delay:	procedure has been disclosed to the public, the Delay must be notified to Consob in accordance with the procedures set forth in Consob Communication No. 0061330 of July 1, 2016, namely by sending a notification via certified email (PEC) to the address consob@pec.consob.it, specifying the “Markets Division” as the recipient and indicating “MAR Delay Notification” at the beginning of the subject line.
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_____, on _____

[Place and date of the assessment]

[Signature of the person who performed the valuation and indication of their position]

* * *

SECTION II

EVIDENCE OF COMPLIANCE WITH THE CONDITIONS FOR DELAY

[Place and date of the assessment]

Evidence of Compliance with the Delay Conditions:	<i>[Note: To be completed by providing evidence of initial compliance with the Delay Conditions (listed below) and of any changes thereto that occurred during the Delay period.</i> <i>Conditions for the Delay:</i> (a) <i>immediate disclosure would likely prejudice the Issuer's legitimate interests;</i> (b) <i>the Inside Information whose disclosure is to be delayed does not conflict with the most recent information disclosed to the public or with any other communication made by the Issuer regarding the same matter to which the Inside Information relates;</i> (c) <i>the Issuer is able to ensure the confidentiality of such information.</i> <i>With reference to point (c) above, one may, for example, refer to the Issuer's adoption of the Procedure, while also providing information regarding:</i> (i) <i>protective barriers established both internally and externally to prevent access to Inside Information by persons other than those within the Issuer who need to access it in the normal course of their professional activities or duties;</i> (ii) <i>the procedures established to disclose Inside Information as soon as possible once its confidentiality can no longer be guaranteed.]</i>
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[Signature of the person who conducted the assessment and indication of the position held by that person]

* * *

SECTION III

IDENTIFICATION OF THE INSIDE INFORMATION AFFECTED BY THE DELAY

Title of the press release:	<i>[Note: To be completed with the full title of the press release through which the Inside Information subject to the Delay is disclosed to the public.]</i>
Reference number:	<i>[Note: To be completed with the identification code of the Inside Information covered by the press release as required by the SDIR system pursuant to the provisions of Annex, Section B, of Delegated Regulation (EU) No. 1437/2016.]</i>
Date and time of the disclosure of the Inside Information to the public:	<i>[Note: To be completed by indicating the date and time of the disclosure of the Inside Information to the public, meaning the time of publication via the SDIR system.]</i>

[Place and date of the assessment]

[Signature of the person who performed the assessment and indication of the position held by that person]