

**PROCEDURE FOR KEEPING THE
REGISTER OF PERSONS WITH ACCESS
TO INSIDER INFORMATION**

**Approved by the Board of Directors of Anima Holding S.p.A. on 12 June 2017,
amended and implemented by the BoD on 27 February 2019
and by the Chief Executive Officer pursuant to art 8.2 on 24 January 2023**



Art. 1 - Introduction

- 1.1 This procedure (the "**Procedure**") contains provisions relating to the keeping and updating of the Register of persons who have access to Insider Information (as defined below) concerning Anima Holding S.p.A. ("**Anima Holding**" or the "**Company**").
- 1.2 The Procedure is adopted in compliance with the current regulatory provisions on "market abuse" (and in particular art. 18 of the MAR Regulation) and is linked to the "Procedure for the management, processing and communication of Confidential Information and Privileged Information "adopted by the Board of Directors of the Company ("**Privileged Information Procedure**").

Art. 2 - Definitions

Capitalized terms and expressions have the meanings provided below:

Chief Executive Officer or CEO:	The Chief Executive Officer of Anima Holding.
General Manager or GM:	The General Manager of Anima Holding.
Board of Directors or BoD:	The Board of Directors of Anima Holding.
LCA Manager:	The Head of Division Legal and Corporate Affairs of Anima Holding.
Supervisor:	The person in charge of keeping the Register pursuant to the following art. 4, identified in the LCA Manager.
Reserved Information:	Any information or news concerning the Company and / or a Subsidiary, which is not in public domain and which due to its object or other characteristics has a confidential nature, and which cannot be classified as Relevant or Insider Information, as defined below .
Privileged Information:	<p>Any information defined as such pursuant to the regulations in force and, in particular, information of a precise nature, which has not been disclosed, concerning - directly or indirectly - the Company and / or one or more Subsidiaries or one or more listed financial instruments issued by the Company which, if disclosed, could have a significant effect on the price of such financial instruments or on the price of related derivative financial instruments.</p> <p>An information is deemed to be precise if:</p> <ul style="list-style-type: none">- 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 it can reasonably be expected to occur, and if- it is sufficiently specific to allow conclusions to be drawn on the possible effect of the aforementioned set of circumstances or of the aforementioned event on the price of the aforementioned financial instruments or related derivative financial instruments.

In the case of a process which is intended to materialize, or which determines, a particular circumstance or a particular event, that future circumstance or future event, as well as the intermediate stages of said process that are connected to the realization or determination of the circumstance or future event, can be considered as information of a precise nature.

An intermediate stage of a prolonged process is considered Insider Information only if, in itself, it meets all the above criteria for qualifying information as insider information.

An information that, if disclosed, would likely have a significant effect on the price of financial instruments and related derivative financial instruments means an information that a reasonable investor would probably use as one of the elements on which to base an investment decisions.

Furthermore, for persons in charge of executing orders relating to financial instruments, Insider Information also means the information transmitted by a client and connected to the pending orders in the client's financial instruments, having a precise nature and concerning, directly or indirectly, one or more issuers of financial instruments or one or more financial instruments and which, if made public, could have a significant effect on the price of such financial instruments or on the price of related derivative financial instruments.

In relation to the Subsidiaries, for the purposes of the Procedure, all the information concerning the Subsidiaries that can be considered of a privileged nature for the Company in light of the importance of the activities of the aforementioned Subsidiaries is relevant.

Relevant Information	the specific Confidential Information which, in the opinion of the Company, has the characteristics to reasonably become, in a second - even near - moment, Insider Information.
Regulation or MAR Reg.:	Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014 relating to market abuse and related implementing provisions.
Subsidiaries:	the subsidiaries of Anima Holding pursuant to Article 93 of the TUF (Legislative Decree no. 58/1998).

Art. 3 - Structure and content of the Register

- 3.1 In compliance with the provisions of current legislation, the Company draws up and keeps the Register updated in electronic format, taking care to ensure at all times:
- the confidentiality of the information contained therein, ensuring that access to the Register is limited to clearly identified persons who must access it due to the nature of their respective function or position at the Company, or at another person acting in the name or on behalf of the Company itself;
 - the accuracy of the information reported in the Register;
 - access and retrieval of previous versions of the Register.
- 3.2 The Register is divided into different sections (the "**Occasional Sections**"), one for each Insider Information. A new Occasional Section of the Register is added whenever new Insider Information is identified. If the information concerns a process taking place in several stages, the Occasional Section of the Register may refer to all stages of the process. Each Occasional Section of the Register reports only the data of the persons having access to the Insider Information contemplated in that specific section.
- 3.3 In addition to the foregoing, the Company also draws up a supplementary section of the Register (the "**Permanent Section**") which contains the data of the persons who always have access to all Insider Information. The data of those who are registered in the Permanent Section are not reported in the Occasional Sections.
The following subjects are usually included in the Permanent Section:
- the Chairman of the Board of Directors, the Chief Executive Officer, the General Manager of the Company and the other Executives with Strategic Responsibilities of the Company identified by the Board of Directors;
 - the secretarial staff directly supporting the persons referred to in the previous point;
 - the other subjects, identified by the CEO and / or by the GM, also with the support of the Supervisor, who always have access to all Insider Information.
- 3.4 Pursuant to art. 18, paragraph 3 of the MAR Reg., The Register contains at least the following information:

- a) the identity of all persons having access to Insider Information; if the person is a legal person, organization or association of professionals, the data of the natural persons who work for these subjects and who, to the best of the Company's knowledge, appear to have access to Insider Information are indicated;
- b) the reason why these persons are entered in the Register;
- c) the date and time in which such persons had access to Insider Information; and
- d) the date of preparation of the Register.

Without prejudice to the foregoing, the contents of the Register must comply with the models, provided for by current legislation, attached to this Procedure for the individual Occasional Sections and for the Permanent Section (**Annex I - Template 1 and Template 2, Commission Implementing Regulation (EU) 2022/1210 of 13 July 2022**).

Art. 4 - Activities of the Supervisor

4.1 The Supervisor is responsible for keeping the Register, in particular providing for:

- a) promptly register persons possessing Insider Information in the Register;
- b) promptly update the Register, indicating the date of the relevant update, whenever:
 - there is a change in the reason for the entering in the Register of a person already registered;
 - there is a new person who has access to Insider Information and must therefore be entered into the Register;
 - a person registered in the Register no longer has access to Insider Information;
 - the information ceases to have a privileged nature.

Each update of the Register indicates the date and time when the change occurred.

- c) promptly inform the persons having access to Insider Information of their inclusion in the Register, with a specific written communication, making sure that they acknowledge in writing of the legal and regulatory obligations arising from entering in the Register and possession of Insider Information, with particular regard to the applicable sanctions in the event of abuse of Insider Information and unlawful disclosure of the same;
- d) inform, in the same manner as in letter c) above, those enrolled in the Register of subsequent updates;
- e) keep all communications made in the Register for a period of not less than five years;
- f) in the event of a request by Consob, transmit the Register to the latter as soon as possible, in the manner indicated by the same Authority, informing the Chief Executive Officer in advance.

4.2 In carrying out its activities, the Person in Charge may benefit from the support of one or more people identified within the Division.

Art. 5 - Entering and management of the Registry

5.1 The Supervisor will make the registrations in the Permanent Section and the related updates:

- autonomously, for the subjects referred to in paragraph 3.3 (i) and (ii) above;
- at the request of the Chief Executive Officer and / or the GM, for the persons referred to in previous paragraph 3.3 (iii).

5.2 The Supervisor enters the registrations in the Occasional Sections and the related updates on his own initiative or at the written request of the Chief Executive Officer, or the General Manager, or the Managers of the other competent company functions, or even the subjects identified by the latter as owners of a specific corporate process or project.

- 5.3 In all cases, the Supervisor may benefit of the support of the competent company structures in order to find the information necessary for the registration or updating.
- 5.4 The data relating to the subjects entered in the Register are kept for five years from the termination of the circumstances that led to their registration or updating.
- 5.5 The Company is always responsible for the correct keeping and timely update of the Register, in accordance with the provisions of the law in force and this Procedure.
- 5.6 The Company may delegate the task of keeping and updating the Register to third parties. In this case, the Company remains fully responsible for compliance with the obligations set out in art. 18 of the MAR Reg. and always retains the right of access to the Register through the General Manager, the Chief Executive Officer, the Supervisor and / or the subjects delegated by them. If the Company has delegated the task of keeping and updating the Register to third parties, the provisions of these Regulations will apply in any case and the Company will take all necessary precautions to ensure compliance with the obligations set out therein by the third party as well.

Art. 6 - Access to the Register

- 6.1 Without prejudice to the powers of the competent Authorities, in order to supervise the correct application of the Procedure, the following have the right to access the Register: the Supervisor and any persons appointed by him; the CEO and the GM and the subjects delegated by them; the subjects responsible for the development, maintenance and security of the electronic application used for keeping the Register.

Art. 7 – Section of the Register of persons with access to Relevant Information

- 7.1 In compliance with the "Insider Information Procedure" and in order to monitor the evolution of Confidential Information that could become Insider Information and, therefore, facilitate the obligations relating to registration in the Register, the Managers of the Competent Functions (as identified in the Procedure for Privileged Information) must promptly inform the Supervisor about the launch of projects, operations or activities for which they are responsible, from which Insider Information may arise, as well as about any development thereof.
- 7.2 If in the context of the activities provided for by art. 4 of the Insider Information Procedure, Relevant Information is identified, the Supervisor feeds a section of the Register containing an indication of the persons with access to Relevant Information ("Relevant Information Section").
- 7.3 The Relevant Information Section contains at least the following information:
 - a) the identity of all persons having access to the Relevant Information;
 - b) the reason why these persons are registered in the Relevant Information Section;
 - c) the date on which such persons had access to the Relevant Information; and
 - d) the date of preparation of the Relevant Information Section.
- 7.4 The Managers of the Relevant Functions (as identified in the Insider Information Procedure) promptly inform of any changes relating to the information previously provided concerning the persons registered in the Relevant Information Section, so that the Supervisor can, if necessary, make the appropriate updates.

Art. 8 - Final Provisions

- 8.1 The data contained in the Register are acquired and processed in compliance with current legislation on the protection of personal data.
- 8.2 The Chief Executive Officer has the right to make changes to the Procedure made necessary by changes that may occur in the regulatory and / or corporate provisions, as well as in the organizational structure of Anima Holding and its Subsidiaries.
- 8.3 For what not expressly established in the Procedure, the applicable regulatory provisions in force apply.
- 8.4 Subsidiaries are required to implement the Procedure; they are not required to set up their own Register.

TEMPLATE 1

Format for the insider lists referred to in Article 1(1)

Description of the source of the specific inside information [:

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

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

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

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

Format for the permanent insiders section of insider lists referred to in Article 1(2)

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

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

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

First name(s) of the insider	Surname(s) of the insider	Surname(s) of the insider at birth (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which the insider was included in the permanent insider section)	National Identification Number (if applicable)	Date of Birth	Personal full home address (street name; street number; city; post/zip code; country) (If available at the time of the request by the competent authority)	Personal telephone numbers (home and personal mobile telephone numbers)
[Text]	[Text]	[Text]	[Numbers (no space)]	[Address of issuer or of the person acting on their behalf or on their account]	[Text describing role, function and reason for being on this list]	[yyyy-mm-dd, hh:mm UTC]	[Number and/or text]	yyyy- mm-dd for the date of birth]	[Text]	[Numbers (no space)]