

PROCEDURE FOR KEEPING THE REGISTER OF PERSONS HAVING ACCESS TO INSIDE INFORMATION OF  
EDILIZIACROBATICA S.P.A.



Procedure for keeping the register of persons who have access to inside information of EdiliziAcrobatica S.p.A. pursuant to the AIM Italia / Alternative Capital Market regulation adopted by Borsa Italiana S.p.A. ("Borsa Italiana") on 1 March 2012 as amended and supplemented (the "AIM Italia Issuers' Regulation") and to Regulation (EU) 596/2014.

## Introduction

In application of the combined provisions of art. 31 of the AIM Italia - Alternative Capital Market Issuers' Regulation (the "AIM Italia Issuers' Regulation"), of art. 18 of Regulation 596/2014/EU of the European Parliament and of the Council as well as of the European Commission's Implementing Regulation 347/2016/EU (the "Implementing Regulation"), the Board of Directors of EdiliziAcrobatica S.p.A. (hereinafter the "Company") at its meeting of 2 November 2018 approved this procedure (hereinafter the "Procedure") for the management, keeping and updating of the register of persons who have access to inside information (the "Register").

This Procedure shall enter into force from the date of commencement of trading of the Company's financial instruments on AIM Italia - Alternative Capital Market, a multilateral trading system managed and organised by Borsa Italiana S.p.A.

The Company's Managing Director was authorised by the resolution of 2 November 2018 to make such amendments and additions to this Procedure as may be necessary as a result of legal or regulatory measures or even the amendments and additions required by Borsa Italiana S.p.A. including as a result of supplements to or amendments of the AIM Italia Issuers' Regulation.

For anything not expressly envisaged in this procedure, reference is expressly made to the provisions on the dissemination of insider information, price sensitive information and other corporate information envisaged by the AIM Italia Issuers' Regulation and by applicable law and regulations.

## Article 1 - Definitions

The terms and expressions that begin with capital letters have the following meanings.

"Managing Director" refers to any director granted powers to manage the Company.

"Board of Statutory Auditors" means the Company's board of statutory auditors in office from time to time.

"Board of Directors" means the Company's board of directors in office from time to time.

"Subsidiaries" means companies that are controlled by the Company pursuant to art. 2359 of the Italian Civil Code.

"Group" means the Company and its Subsidiaries.

"Inside Information" means information of a precise nature that has not been made public, directly or indirectly relating to the Company and/or its Subsidiaries or one or more Financial Instruments, and which, if made public, could have a significant effect on the prices of those Financial Instruments or on the prices of related derivative Financial Instruments.

For the purpose of this definition:

(a) Information is of a "precise nature" if:

(i) It refers to a set of circumstances that can be reasonably expected to come into existence or an event that has taken place or that can be reasonably expected to take place.

(ii) It is specific enough to allow conclusions to be drawn on the possible effect of the set of circumstances or of the event referred to in point (i) on the prices of Financial Instruments.

(b) "Information that, if made public, could significantly affect the prices of the Financial Instruments" means information that a reasonable investor would presumably use as one of the elements to base his/her investment decisions on.

An intermediate step in an extended process is considered Inside Information if it meets the criteria set out in this definition.

"Relevant Information" means any information that could become Inside Information but does not yet have the sufficient precision required to be considered as such.

"Investor Relator" refers to the person in charge of the Company's Investor Relations function.

"Bonds" means the bonds of the company listed on "ExtraMOT", a multilateral trading system organised and managed by Borsa Italiana S.p.A.

"Financial Instruments" means the Shares, Bonds and other financial instruments of the Company admitted to trading on AIM Italia.

## Article 2 - Natural and legal persons entered in the Register

When information becomes inside information, the Company, through the Manager, updates the Register in the manner detailed in this Procedure.

The Register must contain a list of all those who have access to Inside Information and all persons with whom the Company or persons acting on their behalf have a

professional relationship (employment contract or other), and who have access to Inside Information in the performance of certain tasks, such as, for example:

1. The members of the Board of Directors and the Board of Statutory Auditors of the Company, as well as the members of the governing and control bodies of the legal person that exercises control over the Company, as defined pursuant to art. 2359 of the Italian Civil Code.
2. The persons who perform management functions within the Company and employees who have regular access to Inside Information directly or indirectly concerning the Company and/or the Group and have the power to take decisions that may affect the evolution and prospects of the Company and/or the Group, as well as all other persons who as part of their official duties participate in the meetings of the corporate bodies, with respect to Inside Information concerning the Company.
3. The persons who perform the functions referred to in numbers 1 and 2 above in a Subsidiary.
4. The persons with access to inside information who have a professional collaboration relationship with the Company, whether they are employees or not, and who, in the performance of certain duties, have access to inside information such as, for example, consultants, accountants or credit rating agencies.
5. Any person who possesses Inside Information for circumstances other than those referred to in points (1), (2), (3) and (4), when that person knows or should know that it is Inside Information (the "Relevant Persons").

#### Article 3 - Structure of the Register

1. There is a single Register that is divided into separate sections, one for each piece of Inside Information. A new section must be added each time a new piece of Inside Information is identified ("Occasional Access").
2. Each Occasional Access section must include:
  - i. The date and time when the section of the Register was created or the moment when the Inside Information was identified.
  - ii. The date and time of the last update.
  - iii. The date of submission to the competent authority, if any.
  - iv. The name, surname and surname at birth (if different) of the Relevant Person. If the Relevant Person is a legal person, an entity or an association of professionals, the identity of at least one natural person who is able to identify the persons who have access to Inside Information must be specified.
  - v. The professional telephone number of the Relevant Person.
  - vi. The Company's name and address.
  - vii. The function and reason for accessing Inside Information.
  - viii. The date and time when the Relevant Person obtained access to the Inside Information.
  - ix. The date and time when the Relevant Person ceased to have access to Inside Information.

- x. The date of birth of the Relevant Person.
  - xi. The tax code of the Relevant Person.
  - xii. The personal telephone numbers (home and mobile) of the Relevant Person.
  - xiii. The complete home address (street, number, city, postal code, country) of the Relevant Person.
3. Without prejudice to the foregoing, the Company may add an additional section to the Register containing the data of the persons who always have access to all the Inside Information ("Permanent Access"), which, once entered in this section, must not be repeated in the other sections relating to Occasional Access. Each Permanent Access section must include:
- i. The date and time when the section of the Register was created or the moment when the Inside Information was identified.
  - ii. The date and time of the last update.
  - iii. The date of submission to the competent authority, if any.
  - iv. The name, surname and surname at birth (if different) of the Relevant Person.
  - v. The professional telephone number of the Relevant Person.
  - vi. The name and address of the Relevant Person's Company.
  - vii. The function and reason for accessing Inside Information on a permanent basis.
  - viii. The date and time when the Relevant Person was added to the permanent access section.
  - ix. The date of birth of the Relevant Person.
  - x. The tax code of the Relevant Person.
  - xi. The personal telephone number of the Relevant Person.
  - xii. The complete home address (street, number, city, postal code, country) of the Relevant Person.

#### Article 4 - Method of keeping the Register

1. The Register must be kept electronically and consists of a system accessible via Internet/Intranet protected by adequate security systems and access filters and credentials.
2. The Register must ensure:
  - i. The confidentiality of the information contained therein, ensuring that access to the Register is limited to Relevant Persons or persons acting in their name or on their behalf, who must access it by nature of the respective function or position they hold within the Company.
  - ii. The accuracy of the information in the Register.
  - iii. Access to and availability of previous versions of the Register.
3. There is one Register for the Group and it is kept by the Investor Relator (the "Manager"), in compliance with the provisions of Annex 1 of the Implementing Regulation. In addition to the functions identified in other parts of the Procedure, the Manager establishes the criteria and methods to be adopted for the keeping, management and search of the information contained in the Register so as to ensure easy access, management, consultation, extraction and printing.

#### Article 5 - Updating, preservation and transmission of the Register's data

1. The Register must be updated promptly without delay by the Manager, adding the date and time of the update when:

- i. The reason a person is included in the Register changes, including when it is necessary to move the Person's registration from one section of the Register to the other.
- ii. A new person must be registered as having access to the Inside Information.
- iii. A person in the Register no longer has access to Inside Information, specifying the date from which access will be terminated.

2. The lists relating to the Relevant Persons included in the Register are kept by the Company for five years following the end of the circumstances that led to their inclusion or updating.

3. If the competent Authorities request a copy of the Register, the Manager must submit it electronically by certified email as soon as possible. If this request is made by Consob, it must be sent to the address [consob@pec.consob.it](mailto:consob@pec.consob.it).

#### Article 6 - Information provided to persons entered in the Register

1. Immediately after the inclusion of a Relevant Person in the Register, the Manager shall provide such person with information regarding:

- i Inclusion in the Register.
- ii The legal and regulatory obligations arising from access to Inside Information.
- iii The sanctions applicable in the event of the commission of the offences of abuse of Inside Information and market manipulation or in the case of unauthorised disclosure of Inside Information.

2. The information is provided in writing delivered via certified email, registered mail or by hand.

3. The Manager also informs the Relevant Persons already included in the Register of any updates that concern them with a compliant written communication delivered by certified email, registered mail or by hand, and also informs them if they are removed from the Register, here again with a communication delivered by certified email, registered mail or by hand.

4. The Manager shall keep a hard copy of the communications sent to ensure the proof and the traceability of the fulfilment of the information obligations.

5. The Manager shall deliver to the Relevant Persons who so request a hard copy of the information concerning them contained in the Register.

#### Article 7 - Obligations of persons included in the Register

Each person registered is required to:

- i Return a signed copy of this Procedure as acknowledgement of acceptance of its contents to the following address: [investor.relator@ediliziacrobatika.com](mailto:investor.relator@ediliziacrobatika.com).
- ii Comply with the provisions contained therein.

#### Article 8 - Processing of personal data

1. For the purposes of the Procedure, the Company shall be required to process certain personal data of all registered persons. The Company must therefore send them its privacy policy

pursuant to and under the terms of the law on the processing of personal data in force from time to time, together with a copy of this Procedure.

#### Article 9 - Final provisions

1. The Manager has the task of updating the Procedure in light of developments in the regulations regarding the Register and other applicable regulations from time to time and the experience gained, submitting any proposals for changes and/or additions to the Procedure deemed necessary or appropriate to the Managing Director.
2. The Manager shall immediately notify all registered persons in writing of the changes and/or additions to the Procedure referred to in this Article and shall obtain their acceptance of the new contents of the Procedure in the forms and in the manner detailed in Article 6 above.



## ANNEX A – LETTER OF ACCEPTANCE

Notification of inclusion in the Insider Register and information on the processing of personal data of data subjects subject to the obligation of inclusion in the Register of persons who may have access to inside information pursuant to Regulation 596/2014/EU

Ediliziacrobativa S.p.A. ("Company" or "Data Controller"), in compliance with the provisions of art. 31 of the AIM Italia - Alternative Capital Market Issuers' Regulation (the "AIM Italia Issuers' Regulation"), art. 18 of Regulation 596/2014/EU of the European Parliament and of the Council (the "MAR Regulation") as well as European Commission Implementing Regulation 347/2016/EU, has established a register of persons who have access to information that may become insider information pursuant to art. 7 of the MAR Regulation (the "Register").

Pursuant to article 18, second paragraph of the MAR Regulation, we inform you that your personal data have been included in said Register for the reason communicated to you by email.

We remind you that with regard to the dissemination of inside information relating to the Company, those knowing such information must comply with the provisions contained in the "Procedure relating to the management and dissemination of inside information and capital transactions" which is attached, also available on the website [www.ediliziacrobativa.com](http://www.ediliziacrobativa.com).

For any clarifications, please contact the Company's Manager through the contacts made available on the Company's website, in the Investor Relations section.

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In accordance with the provisions of the applicable regulations on the protection of personal data, we inform you that the personal data you provide to the Company or that are otherwise acquired by it may be processed in compliance with applicable regulations.

### 1. Data Controller

The Data Controller is Ediliziacrobativa S.p.A., with registered office in Milan (MI), Via Turati 29, Milan Company Register, tax code and VAT number 01438360990.

### 2. Source of the personal data

Your personal data are collected from the contractual documentation relating to your contractual relationship with the Data Controller, as well as during any meetings and negotiations with the Data Controller.

### 3. Personal data processed

Below is a list of your personal data – which may be supplemented from time to time – that the Data Controller may process for the purposes of inclusion in the Register:

(a) Personal information (name, surname, date of birth, full personal home address).

(b) Tax data (tax code).

(c) Other identification elements (personal or professional telephone number).

(collectively, the "Data").

### 4. Purposes and legal bases of the processing

The Data shall be processed by the Data Controller for the following purposes:

- (1) Effectively manage the fulfilments related to the obligations deriving from Italian and European regulations on inside information.
- (2) Comply with obligations imposed by provisions issued by Authorities empowered to do so by law and by supervisory and control bodies.
- (3) Assert or defend a right in court, including by a third party.

The legal basis for the processing of the Data lies in the need to comply with legal and/or regulatory obligations that the Data Controller is subject to.

#### 5. Data retention period

The Data are only processed for the time strictly necessary to achieve the purposes they were collected for, and in any case for the period required by the aforementioned legal provisions.

#### 6. Disclosure (recipients) of the Data

The Data may be processed by employees and/or contractors of the Data Controller who are assigned to the competent areas, duly designated as persons authorised to process data. Within the limits of the purposes referred to in point 4 above, third-party recipients of the Data – duly designated as data processors or as independent data controllers – include but are not limited to the following categories:

- Parties that perform professional assistance/consulting tasks on behalf of or for the Data Controller, in particular legal consultants.
- Public institutions.
- Regulatory authorities.
- Parent companies, subsidiaries and associates of the Data Controller and their employees or consultants.
- External maintenance staff of the information system and/or software used by the Data Controller, in the event of their breakdown or problems with the security of the processing.

#### 7. Transfer of the Data to third countries

The Data shall not be transferred outside the European Union.

#### 8. Dissemination of the Data

The Data shall not be disseminated.

#### 9. Your rights

You have the

right to:

- a. Obtain confirmation of the existence or otherwise of personal data concerning you.
- b. Know the purposes of the processing, the recipients, the retention period.
- c. Have the processing corrected, erased or, where applicable, restricted.
- d. Object to the processing.
- e. Where applicable, receive the personal data provided to the Data Controller in a structured, commonly used format that is readable by automatic devices, as well as to transmit them to another data controller without impediment by the Data Controller.
- f. Lodge a complaint with the Personal Data Protection Authority.

The rights referred to in letters a. - e. may be exercised at any time by simple request to the Data Controller, to be submitted:

- By email, to the address: [investor.relator@ediliziacrobatika.com](mailto:investor.relator@ediliziacrobatika.com)
- By post to the address: Ediliziacrobatika S.p.A., Viale Brigade Partigiane 18, 16129 - Genoa, for the attention of Ms Deborah Dirani.

The Manager of the Insider Register

For acknowledgement and acceptance \_\_\_\_\_