

**PROCEDURE FOR THE MANAGEMENT OF MATERIAL INFORMATION AND
INSIDE INFORMATION
OF NEXT GEOSOLUTIONS EUROPE S.P.A.**



(Document approved by the Board of Directors of Next Geosolutions Europe S.p.A. during the meeting of 15 May 2024)

Article 1
Preamble

- 1.1 This regulation (the "Regulation") is adopted by Next Geosolutions Europe S.p.A. (the "Company") as issuer of financial instruments on Euronext Growth Milan, a multilateral trading system organised and managed by Borsa Italiana S.p.A. (the "EGM").
- 1.2 The Regulation has been adopted in compliance with the provisions of: (i) Art. 114 of (It.) Legislative Decree of 24 February 1998 no. 58 (the "Consolidated Law on Finance" or "TUF"), (ii) Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014 as subsequently amended and supplemented (the "Market Abuse Regulation" or "MAR"); (iii) Commission Implementing Regulation (EU) 2022/1210 of 10 March 2016 (the "Implementing Regulation (EU) 2022/1210"); (iv) the Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016 (the "Implementing Regulation (EU) 2016/1055"); as well as (v) the "*Guidelines on the Market Abuse Regulation (MAR) – Delay in the disclosure of inside information*" published by the *European Securities and Markets Authority* (ESMA); and (vi) Guidelines No. 1/2017 on "Management of Inside Information" adopted by Consob on 13 October 2017 (the "Guidelines").
- 1.3 The Regulation contains the provisions relating to (i) the internal management and external disclosure of documents and information concerning the Company and its subsidiaries, with particular reference to Material and Inside Information (as defined below) and, in particular, is aimed at guaranteeing the utmost confidentiality and privacy in the management of such information as well as compliance with the principles of transparency and truthfulness in its external disclosure.
- 1.4 The Regulation comes into force as of the submission of the application for admission to trading of the Company's ordinary shares on the multilateral trading system Euronext Growth Milan, organised and managed by Borsa Italiana S.p.A..

Article 2 *Definitions*

Capitalised terms and expressions have the meaning hereunder:

Conditions for the Delay the conditions that are necessary for the Company to delay public disclosure of Inside Information and, in particular: a) immediate disclosure would probably prejudice the legitimate interests of the Company, b) delaying disclosure would probably not have the effect of misleading the public, and c) the Company is able to guarantee the confidentiality of such information.

Addressees the addressees of the Regulation, i.e. the directors, statutory auditors, managers and all employees of the Company and of the Subsidiaries, as well as other persons acting in the name of or on behalf of the Company or its Subsidiaries and having access to Material or Inside Information in the exercise of an occupation, profession or function.

FGIP the Company's Inside Information Management Department, in charge of managing the process of management and disclosure of Material and Inside Information pursuant to this Regulation and taking into account the guidelines of the Supervisory Authority and the Court of Justice of the European Union. The FGIP is overseen by the Company's investor relations manager.

Inside Information pursuant to art. 7 of the MAR means information of a *precise* nature, which *has not been made public*, relating – directly or indirectly – to the Company or to one or more of its Subsidiaries or the Financial Instruments issued by the Company which, if it were made public, *would be likely to have a significant effect on the prices* of said Financial Instruments or on the price of related derivative financial instruments.

Information is of a *precise nature* if:

- it refers to a set of *existing circumstances* or circumstances that may *reasonably be expected to come into existence* or an *event which has occurred* or which may *reasonably be expected to occur*;
- is sufficiently *specific* to enable conclusions to be drawn as to the possible effect of the aforesaid set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument.

In the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those

future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

By way of example, information which relates to an event or set of circumstances which is an intermediate step in a protracted process may relate, for example, to the state of contract negotiations, terms provisionally agreed in contract negotiations, the possibility of the placement of financial instruments, conditions under which financial instruments will be marketed, provisional terms for the placement of financial instruments, or the consideration of the inclusion of a financial instrument in a major index or the deletion of a financial instrument from such an index (*c.f.* recital no. 17 of the MAR).

An intermediate step in a protracted process is considered inside information if, in itself, it meets all the above criteria for qualifying information as inside.

Information which, if disclosed to the public, would be likely to have a significant effect on the prices of the financial instruments or on the price of related derivative financial instruments (price sensitive information) means information that a reasonable investor would be likely to use as one of the elements on which to base his or her investment decisions.

In relation to the Subsidiaries, all information that can be considered of an inside nature for the Company in light of the significance of the activities of the Subsidiaries is relevant for the purposes of the Regulation.

**Material
Information**

any information which, in the opinion of the Company, may at a later date, even in the near future, become Inside Information according to the provisions of Art. 7 MAR as well as the guidelines of the Supervisory Authority and the Court of Justice of the European Union, but which does not yet have the sufficient precision required to be considered as such.

The relevant information originates mainly from activities carried out by the Company or Subsidiaries. Material information includes: (i) information received from outside that is material; (ii) information held by the Company or Subsidiaries that is material in combination with public information.

Euronext Growth Milan Issuers' Regulation	the Euronext Growth Milan Issuers' Regulation adopted by Borsa Italiana S.p.A. on 1 March 2012, as subsequently amended and supplemented.
Financial Reports	the half-yearly financial report and the annual financial report referred to in Articles 18 and 19 of the Euronext Growth Milan Issuers' Regulation.
Subsidiaries	the companies controlled by the Company pursuant to Art. 2359 of the (It.) Civil Code.
Financial Instruments	collectively the financial instruments of the Company admitted to trading on a multilateral trading facility, as defined in Article 4, paragraph 1, section 15) of Directive 2014/65/EU and referred to in Section C of Annex I to Directive 2014/65/EU of the European Parliament and of the Council.

Article 3

Conduct obligations

3.1 The Addressees of the Regulation shall:

- a) maintain the secrecy of documents, Material and Inside Information coming into their possession;
- b) use the aforementioned documents and Material and Inside Information exclusively in the normal exercise of their functions and in compliance with the applicable law and this Regulation;
- c) not disclose such information to other Addressees, without prejudice in any case to the possibility of disclosure in the normal exercise of one's work, profession or function and in any case on the basis of the so-called need-to-know principle, described in Article 5.6 below;
- d) process such information only within authorised channels, taking all necessary precautions so that its circulation within the corporate context may take place without prejudice to the confidential or privileged nature of such information;
- e) guarantee the utmost confidentiality and privacy of Material and/or Inside Information, until such time as the same is disclosed to the public in the manner provided for in this Procedure;
- f) promptly inform the Chief Executive Officer and/or the Board of Directors and FGIP – in relation to the information under their respective purview – of any act, fact or omission that may represent a violation of this Procedure.

- 3.2 The Addressees shall be personally responsible for the safekeeping of the documents pertaining to the Material or Inside Information to which they have access.
- 3.4. The Addressees shall not:
- (i) divulge, disseminate or disclose in any manner or by any means whatsoever such information to persons other than those for whom such communication is necessary to enable the exercise of the relevant functions within the Company or the group to which it belongs;
 - (ii) use Inside Information in order to buy or sell Financial Instruments to which such information relates, on their own behalf or on behalf of third parties, directly or indirectly;
 - (iii) use inside information by cancelling or amending an order concerning a Financial Instrument to which the information relates where the order was placed before the Person Concerned possessed said Inside Information;
 - (iv) recommend or induce others, on the basis of the Material Information and/or Inside Information in their possession, to carry out transactions in the Financial Instruments to which such information relates.

Article 4

External disclosure of corporate information

- 4.1 All relations of the executives and employees of the Company and its Subsidiaries with the media, professional investors and financial analysts, for the purpose of disclosing corporate documents and information, must be authorised and take place through the corporate departments appointed for that purpose.
- 4.2 The disclosure of documents and information pursuant to Article 4.1 of the Regulation is in any case made in a complete, timely and adequate manner, avoiding information asymmetries between investors or the creation of situations that could in any case alter the performance of the quotations.
- 4.3 In the event that the documents and information contain references to specific data (economic, equity, financial, operational, investment, personnel deployment, etc.), such data must be validated in advance by the competent internal structures.

Article 5

Identification and management of Material Information

- 5.1 The Company, with the assistance of the individual corporate departments, monitors information that is likely to become Material Information.
- 5.2 In relation to information referring to protracted processes that normally take place in several stages, FGIP, with the support of the individual corporate departments, may

identify, for each stage, the department with the broadest access thereto, in order to monitor the information.

- 5.3 The departments involved shall pay particular attention to the stage of development of such information and, if any information may qualify as Price-Sensitive Information, shall promptly notify FGIP thereof, for the purposes of the assessments set forth in Article 5.4 below, indicating in writing the reasons why they consider the information to be Price-Sensitive Information.
- 5.4 Following the report referred to in Article 5.3 above, FGIP shall promptly make its assessment as to the material nature of the information.
- 5.5 Once the material nature of an item of information has been verified, FGIP shall ensure that evidence of that assessment is maintained on a technical instrument that ensures the information's accessibility, readability and preservation in a durable medium.
- 5.6 FGIP monitors Material Information and its stage of development and ensures that it is circulated within the Company only on a strictly confidential basis and only to Company officers, employees and consultants whose involvement is necessary (the so-called "need to know" principle). FGIP ensures that such persons are adequately informed of the existence of the Regulation and the obligations arising from the possession of Material Information under the Regulation.
- 5.7 If, based on the stage of development of a specific piece of Material Information, it is reasonable to believe that it may shortly acquire inside information status, each corporate department shall inform FGIP.

Article 6

Assessment of the inside nature of the information

- 6.1 The Addressees shall promptly notify FGIP of the content of the Material Information and/or Inside Information and, subsequently, inform it of the relevant status, if the Material Information relates to events or transactions with a progressive formation. This update must take place at least once every seven (7) days, or as otherwise required by the nature of the event or transaction.
- 6.2 FGIP manages the mapping of relevant information flows on an ongoing basis in such a way as to (i) identify, on an ongoing basis and with precision, the persons who have access to Price Sensitive Information; (ii) assess whether such Price Sensitive Information has become Inside Information; and (iii) prevent third parties from coming into possession of Inside Information that they have no reason to know, thereby jeopardising its privileged nature.
- 6.3 The Subsidiaries, and in particular the persons responsible by virtue of the entity's internal organisation, are required to promptly inform the Chief Executive Officer and/or FGIP of the occurrence of a set of circumstances or an event that constitutes

or may constitute Price Sensitive and/or Inside Information. The assessment of the materiality of a piece of information is, however, left to the Managing Director and/or the Investor Relations Manager, in consultation with the Euronext Growth Advisor.

- 6.4 Forecast data and quantitative targets that deviate significantly from the actual performance of the company with respect to the data previously made available to the public shall be deemed to be Inside Information and shall be subject to the disclosure procedure set forth in Article 7.
- 6.5 The assessment of the privileged nature of information is carried out by FGIP, with the support of the company's legal department.

Should it deem it advisable or necessary, FGIP may refer this assessment to the Board of Directors.

When Material Information becomes inside information, FGIP formalises this decision and records it on a technical instrument that ensures accessibility, readability and preservation on a durable medium of the following information: (i) date and time when the information became inside information; (ii) date and time when the Company decided on the inside nature of the information; (iii) identity of the persons who made the decision or participated in its formation.

- 6.6 Once the inside nature of a piece of information has been ascertained, FGIP proceeds with its prompt disclosure to the public pursuant to Article 7 of the Regulation or, alternatively, proceeds with the activation of the delay procedure if the conditions under Article 8 of the Regulation and Article 17(4) MAR are met.

Article 7

Public disclosure of inside information

- 7.1 The Company shall disclose to the public, as soon as possible, Inside Information that directly concerns the Company by means of a specific press release prepared with the support of the corporate departments involved in the identification of Inside Information and, if applicable, of the Subsidiaries competent at any given time, as well as the legal department of the Company.
- 7.2 In the event that the press release contains information on the economic, equity or financial situation of the Company or the Subsidiaries or information of an accounting nature, including interim information, the text of the press release, before being submitted to FGIP for approval pursuant to Article 7.3 of the Regulation, shall be forwarded to the Chief Executive Officer and/or the Chief Financial Officer for verification and approval;
- 7.3 FGIP approves the press release and orders its publication. If it is a matter for the Board of Directors or if FGIP deems it advisable or necessary, approval of the press release may be referred to the Board of Directors.

In particular, FGIP shall prepare a complete and correct draft of a press release with respect to the Inside Information to be published, indicating all price-sensitive information – as well as avoiding combining the disclosure of Inside Information to the public with the commercialisation of the Company’s business – and shall send it to the Euronext Growth Advisor for its due knowledge and comments. After receiving Euronext Growth Advisor’s consent on the content of such disclosure, FGIP shall make public disclosures of Inside Information in accordance with the applicable laws and regulations.

- 7.4 The press release, after transmission to the SDIR [System of Dissemination of Regulated Information] circuit used by the Company, is published on an easily identifiable section of the Company’s website to which access is permitted free of charge and without discrimination, and retained for a period of at least five years. This section clearly indicates the date and time of publication of the individual press releases, which are presented in chronological order.

The Inside Information must not be published elsewhere before being communicated through the SDIR; to this end, the Inside Information must be managed by adopting all necessary caution so that the relative circulation within the company context is carried out without any prejudice to the Company until such time as such Inside Information is disclosed to the public in compliance with the provisions of this Regulation.

- 7.5 As specified in the Guidelines:

- a) the disclosure takes place within the timeframe necessary for drafting the press release in order to allow for a complete and correct evaluation of the Inside Information by the public and for its subsequent transmission to the SDIR circuit used by the Company ⁽¹⁾;
- b) possible internal organisational problems, such as the absence of substitutes of the persons who should take the decision or who should take care of the dissemination, cannot justify the extension of this time frame;
- c) In order to enable Consob and Borsa Italiana S.p.A. (“Borsa Italiana”) to carry out their respective supervisory activities in a timely manner, the Company may give Consob advance notice, also in a timely manner, of the possibility that it may publish Price Sensitive Information while the Financial Instruments are being traded. Similar notice is given to Borsa Italiana in accordance with the Euronext Growth Milan Issuers’ Regulation.

- 7.6 In the event that Inside Information has been accessed by a third party who is not bound by an obligation of confidentiality (regardless of whether such obligation is of a legal, regulatory, statutory, or contractual nature), due to intentional or

⁽¹⁾ If the information becomes inside information on a Friday after the markets close, the issuer does not take into account the fact that the markets will be closed over the weekend for the purposes of correct publication timing.

unintentional disclosure by the Company or by a person acting in its name or on its behalf in the normal course of the exercise of their professional activity or function or, however, the confidentiality of the Inside Information is in fact breached, the Company is obliged to re-establish parity of information through public disclosure, in the terms described above, of the Inside Information. Such disclosure must take place (i) simultaneously, if the disclosure was intentional, and (ii) promptly, if the disclosure was not intentional. In the event of a loss of confidentiality, public disclosure of the Inside Information shall take place as soon as possible. This also applies to rumours that are sufficiently accurate to indicate that the confidentiality of the Inside Information is no longer guaranteed.

- 7.7 The public disclosure of Inside Information concerning Subsidiaries is in any case the responsibility of the Company. Subsidiaries must therefore refrain from independently disclosing Inside Information to the public.

Article 8

Delay in disclosure of inside information

8.1 Conditions for the Delay, related assessments and monitoring

- 8.1.1 Notwithstanding the provisions of Article 7 of the Regulation, the Company may delay, even in the case of a protracted process occurring in stages and intended to bring about or resulting in a particular circumstance or event, under its own responsibility, the public disclosure of Inside Information, provided that all of the following conditions are met:

- a) immediate disclosure would probably prejudice the legitimate interests of the Company;
- b) the delay in disclosure would probably not have the effect of misleading the public;
- c) the Company is able to guarantee the confidentiality of such information.

In the event of a delay in the disclosure of Inside Information, the Company shall implement the safeguards and apply the procedures provided for in Implementing Regulation (EU) 2016/1055.

- 8.1.2 The decision as to the activation of the delay is the responsibility of FGIP, which, after assessing the existence of the aforementioned conditions, and taking into account, in any event, also the provisions contained in the ESMA Guidelines, also identifies the beginning of the delay period and its likely end and completes the appropriate form prepared in accordance with the template in **Annex A** to this Procedure.
- 8.1.3 Once a decision has been made to delay the public disclosure of Inside Information, FGIP, with the support of the corporate departments involved and the Company's legal department:

- a) shall endeavour to ensure the utmost confidentiality in the processing of the aforementioned information;
 - b) shall constantly monitor the continued existence of the Conditions for the Delay, ensuring, also through the use of appropriate protective barriers, that the confidentiality of the Inside Information affected by the delay is guaranteed until its disclosure to the public;
 - c) shall arrange for the preparation of a draft press release concerning Inside Information whose public disclosure has been delayed in order to ensure the timely publication of such information in the event that, during the period of delay, the conditions justifying it cease to exist.
- 8.1.5 In particular, having ascertained the existence of the Conditions for the Delay, FGIP or the Chief Executive Officer shall deposit the aforesaid form at its office, together with any additional documents on the basis of which the assessment was made and which certify the reasons for the delay, taking appropriate measures to ensure that such documents are not accessible by persons other than those who, at the Company, must have access to them in the normal exercise of their professional activity or function.
- 8.1.6 More generally, the Company shall adopt a set of measures (barriers) aimed at segregating Inside Information, i.e. preventing persons (internal or external to the Company) who do not need access to Inside Information in the normal exercise of their professional activity or function, i.e. persons who do not need to know the Inside Information (see Section 5.1.2. of the Guidelines) from having access thereto.
- 8.1.7 If the disclosure of Inside Information is delayed and the confidentiality of the Inside Information is no longer guaranteed, the Company shall disclose such Inside Information to the market as soon as possible pursuant to Article 7 of the Regulation.
- 8.1.8 The confidentiality of the Inside Information shall also be deemed to have been breached if a rumour explicitly and accurately refers to a piece of Inside Information whose disclosure has been delayed.
- 8.2 In the event that a decision has been made to delay the disclosure of a piece of Inside Information, the Company shall ensure that the information required pursuant to Article 4 of EU Regulation 2016/1055 is stored on a durable medium.
- 8.2.1 If the Issuer has a buy back programme underway pursuant to Article 5 of the Market Abuse Regulation (the "Buy Back Programme"), following the decision to delay publication of the Inside Information, the department in charge of managing inside information, as identified by the Company, shall report to the department responsible for the purchase of treasury shares that the conditions for being able to operate with the benefit of the exemption provided for by the Market Abuse Regulation no longer

exist (*c.f.* Article 4, par. 1 (c) of Delegated Regulation (EU) 2016/1052)⁽²⁾, unless the conditions for continuing the Buy Back Programme as set out in Article 4 para. 2, of the aforementioned Delegated Regulation are met. If the Company has suspended the ongoing Buy Back Programme, the aforementioned department responsible for the management of inside information shall notify the department responsible for the purchase of treasury shares that the conditions for resuming operations have been restored, benefiting from the exemption provided for in the Market Abuse Regulation (*c.f.* Sections 6.6.2 and 6.8.4 of the Guidelines).

8.2.2 Similarly, if the Company has in place a share buy back programme that does not fall within the scope of Art. 5 of the Market Abuse Regulation, following the decision to delay publication of the Inside Information, it shall suspend the purchases to be made in execution of the aforementioned programme and shall resume operations only after the Inside Information has been disclosed to the public (in which case the reporting obligations referred to above shall apply *mutatis mutandis*).

8.2.3 During the delay, the Company shall not make public information that is inconsistent with the information affected by the delay (*c.f.* Section 6.4.2 of the Guidelines).

8.3 Notification of the delay

8.3.1 When the disclosure of Inside Information has been delayed pursuant to Article 8.1 of the Regulation, the Company shall notify Consob of the delay immediately after the information has been disclosed to the public, and shall provide, if so requested by Consob, an explanation of how the Conditions for the Delay have been met.

This notification shall be sent to Consob by certified e-mail to the address consob@pec.consob.it, specifying “Markets Division” as the addressee and indicating at the beginning of the subject line “MAR Delayed disclosure”.

8.3.2 The notification must contain the following information:

- a) full Company name;
- b) identity of the person effecting the notification (name, surname and position with the Company of the person making the notification);
- c) contact details of the person making the notification (professional e-mail address and telephone number);
- d) identification of the Inside Information affected by the delay (title of the disclosure press release, reference number – if assigned by the dissemination system – and date and time of the public disclosure);
- e) date and time of the decision to delay the disclosure of the Inside Information;

⁽²⁾ This is without prejudice to the possibility for the Company to continue the Buy Back Programme by adopting the measures indicated by Article 4, para. 2 and 4, of Delegated Regulation (EU) 2016/1052.

- f) identity of all persons responsible for the decision to delay public disclosure of the Inside Information.

In the event that, pursuant to Art. 114, paragraph 3 of the Consolidated Law on Finance (TUF), read in conjunction with Art. 4, para. 4 of the Implementing Regulation (EU) 2016/1055, the explanation in writing of the manner in which the Conditions for the Delay have been met must be provided to the Competent Authority upon the latter's subsequent request, the Company shall comply with the Competent Authority's requests by providing it, in the manner set out above, with the form set out in Annex A complete with such information as well.

- 8.3.3 Notification to the Competent Authority is not required if, after the decision to delay publication, the information is not disclosed to the public because it has lost its privileged character.

Article 9

Relations with the Subsidiaries

- 9.1 The Company may issue appropriate instructions to the Subsidiaries to ensure that they promptly provide all the information necessary to comply with the disclosure obligations provided for by the applicable legislation and for the implementation of the Regulation.

Article 10

Violations of the Regulation and sanctions

- 10.1 It should be noted that insider dealing and market manipulation constitute offences punishable by penal and administrative sanctions against those who have committed such offences and may also entail the application of sanctions of various kinds against the Company.
- 10.2 Violation of the obligations laid down by this Regulation, even where it does not result in conduct directly sanctioned by the judicial authorities, constitutes serious damage for the Company, also in terms of its image, with important economic/financial consequences, as well as grounds for termination of the existing relationship for just cause. Violation also implies the possibility of claiming compensation for the perpetrator for the damage suffered by the Company.
- 10.3 In the event of a violation of this Regulation Rules by a director, the director concerned may not participate in the deliberation on sanctions. If the majority of the members of the Board of Directors took part in the violation, the competent body to take appropriate measures will be the Board of Statutory Auditors.
- 10.4 If committed by other Addressees (other than directors and statutory auditors), the violation of the obligations under this regulation may constitute a disciplinary offence

for the persons required to enforce it and, in the most serious cases, may result in dismissal, also exposing the person who committed the violation to the risk of penal and administrative sanctions.

- 10.5 Should the Company be sanctioned for violation of the provisions on corporate disclosure resulting from non-compliance with the principles laid down in this procedure, the Board of Directors shall take action in recourse against those responsible for such violations, in order to obtain reimbursement of the charges relating to the payment of such sanctions, without prejudice to any further claims for damage, including to the Company's image.
- 10.6 The Board of Directors, at the proposal of the CEO and/or FGIP, shall take the measures provided for in the employment contract regulations (in the case of the respective executives or employees), as well as the provisions of the (It.) Civil Code, against those responsible for violating the provisions defined above.

Article 11

Final provisions

- 11.1 FGIP may issue specific directives to the corporate departments involved from time to time for the proper implementation of the Regulation.
- 11.2 FGIP periodically assesses the adequacy of the Regulation.
- 11.3 FGIP and the Chair of the Board of Directors, also acting severally, shall introduce into the Regulation any amendments made necessary by changes in the internal organisational and/or statutory and/or regulatory provisions of reference, as well as in the organisational structure of the Company and its Subsidiaries. Amendments and/or additions to the provisions will be communicated to the Addressees with an indication of the effective date of the new or amended provisions.
- 11.4 This Regulation shall be brought to the attention of all Addressees by the Managing Director and/or FGIP, by forwarding a copy thereof to them.

The Subsidiaries undertake to acknowledge this Regulation and to transmit a copy thereof to their Addressees, as well as to fully comply with its provisions.

Annex A

1	IDENTITY OF THE ISSUER		
a)	Company Name	[•]	
	Tax Code	[•]	
2	IDENTIFICATION DATA OF THE NOTIFYING PARTY		
a)	Name and Surname	<i>Name</i>	<i>Surname</i>
b)	Position/Qualification at the Issuer	[•]	
c)	Corporate contacts	E-mail address	<i>Telephone Number</i>
3	INFORMATION ON THE PUBLICATION OF THE INSIDE INFORMATION SUBJECT TO THE DELAY ⁽³⁾		
a)	Subject of the Inside Information ⁽⁴⁾	[•]	
b)	Registration number assigned by the System of Dissemination of Regulated Information called "1Info"	[•]	
c)	Date and time of the press release's dissemination	<i>Date</i>	<i>Time</i>
4	IDENTIFICATION OF THE INSIDE INFORMATION		

⁽³⁾ This section is completed after the Disclosure to the Market, pursuant to Art. 17 of Regulation (EU) No. 596/2014, of the "Document" containing the Inside Information.

⁽⁴⁾ Indicate the information entered in the subject field provided by the SDIR system's "New Press Release" form.

a)	Description of the Inside Information	[•]		
b)	Date and time of identification of the Inside Information	<i>Date</i>	<i>Time</i>	
5 INFORMATION ON THE DECISION TO DELAY THE INSIDE INFORMATION				
a)	Date and time at which the decision to delay the disclosure of the Inside Information was made	<i>Date</i>	<i>Time</i>	
b)	Prediction regarding the timing of the Inside Information's public disclosure			
6 IDENTITY OF THE PERSONS RESPONSIBLE FOR TAKING THE DECISION TO DELAY THE PUBLIC DISCLOSURE OF THE INSIDE INFORMATION				
		<i>Name</i>	<i>Surname</i>	<i>Position</i>
		<i>Name</i>	<i>Surname</i>	<i>Position</i>
		<i>Name</i>	<i>Surname</i>	<i>Position</i>
7 REASON FOR THE DELAY ⁽⁵⁾				
a)	State the reason why it is believed that public disclosure of the Inside Information subject to the delay would prejudice the legitimate interest of the Company			
	[•]			
b)	State why it was considered that the delay in disclosure did not have the effect of misleading the public.			

⁽⁵⁾ The reasons for the delay will be provided to the competent Authority at its request.

	[•]												
c)	Report what measures have been taken to i) prevent access to the Inside Information by unauthorised persons; ii) proceed to prompt public disclosure of the Inside Information if the confidentiality of such information is no longer guaranteed.												
	[•]												
d)	Identity of the persons who are responsible for the continuous monitoring of the conditions enabling the delay.												
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e)	Identity of the persons responsible for taking the decision to disclose the inside information to the public												
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<i>Name</i>	<i>Surname</i>	<i>Position</i>											
<i>Name</i>	<i>Surname</i>	<i>Position</i>											

[Place and Date]

[Signature]