



KME Group S.p.A.

Procedure on *Internal Dealing*

Update: text adopted on 30 September 2026.

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Introduction

KME Group S.p.A. (“**KME**” or the “**Company**”) has adopted this “Procedure on Internal Dealing” (the “**Procedure**”) in order to implement the rules on transactions in the Company’s financial instruments laid down in:

- Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (“**MAR**”);
 - Commission Implementing Regulation (EU) 2016/523 of 10 March 2016 (implementing technical standards with regard to the format and template for notification and public disclosure of managers’ transactions);
 - Commission Delegated Regulation (EU) 2016/522 of 17 December 2015, as last amended by Commission Delegated Regulation (EU) 2026/788 of 8 April 2026 as regards the permission for trading during closed periods;
- and
- the applicable provisions of the Consob Regulation adopted by resolution No. 11971 of 14 May 1999 (the “**Issuers’ Regulation**”), as last amended by Consob resolution No. 23979 of 14 May 2026, for the purposes of coordination with the changes introduced by Regulation (EU) 2024/2809 of the European Parliament and of the Council of 23 October 2024 (the “**Listing Act**”) and by Legislative Decree No. 47 of 27 March 2026 (the “**Riforma TUF**”).

The Procedure is a measure designed to ensure equal access to information and to prevent the exploitation of informational advantages through insider dealing, conduct which may constitute criminal offences and give rise, among other things, to the administrative liability of legal entities under Legislative Decree No. 231 of 8 June 2001. This Procedure therefore forms an integral part of the Company’s internal control system and is accordingly relevant to the safeguards identified in the Company’s Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 (the “**231 Model**”).

The latest amendment to the Procedure was adopted by resolution of the Board of Directors of 30 September 2026.

The Executive Directors are expressly authorised to make any amendments to the Procedure required to implement statutory provisions and must subsequently report them to the Board of Directors.

Procedure on *Internal Dealing*

Article 1 Scope

1. With specific reference to Article 19 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation – “**MAR**”), as supplemented by Articles 7 et seq. of Commission Delegated Regulation (EU) 2016/522 of 17 December 2015 and by Commission Implementing Regulation (EU) 2016/523 of 10 March 2016, as well as by Article 152-quinquies.1 of the Issuers’ Regulation, it should be noted that Relevant Persons and Persons Closely Associated with Relevant Persons, as defined in Article 2 below, are required to notify the Company and Consob of the transactions referred to in Article 3 of this Procedure involving:

- i. shares of the Company;
- ii. debt instruments of the Company;
- iii. derivatives linked to the shares or debt instruments of the Company;
- iv. other financial instruments linked to the shares or debt instruments of the Company that the Company may issue in the future pursuant to its Articles of Association and applicable law, or financial instruments linked to the shares of the Company, as identified in Article 3 below, carried out by them, including through nominees, as well as those carried out by Persons Closely Associated with Relevant Persons;

2. Upon receipt of the notification, the Company in turn discloses that information to the public within the time limits and in the manner laid down by applicable laws and regulations.

3. The attention of Relevant Persons is specifically drawn to the statutory provisions under which failure to comply with the laws and regulations referred to above may result in the application to them of the sanctions, including criminal sanctions, provided for by legislation in force from time to time. It should also be noted that the notification obligation imposed on Relevant Persons is without prejudice to their duty not to engage in market abuse under MAR.

Article 2 Definition of Relevant Persons and Persons Closely Associated with Relevant Persons

A. Relevant Persons

1. For the purposes of the Procedure, the following are “**Relevant Persons**”:

- a) the Directors;
- b) the standing Statutory Auditors; and
- c) all senior executives of the Issuer with strategic responsibilities.

2. The identification of any further Relevant Persons, in addition to those indicated in the first paragraph of this Article, falls exclusively within the competence of the Company’s Board of Directors, which shall in that case adopt a specific resolution supplementing or amending the Procedure.

3. The List of Relevant Persons, prepared and updated by the Internal Dealing Officer, is kept by the Internal Dealing Officer in the archive referred to in Article 5 of the Procedure.

4. Relevant Persons are subject to the obligations to notify Relevant Transactions under MAR, as specified in Article 3 of the Procedure, and to the prohibition set out in Article 9 (Closed Periods) of the Procedure.

B. Persons Closely Associated with Relevant Persons

1. Pursuant to Article 3(1), point (26), of MAR, “**Persons Closely Associated with Relevant Persons**” are persons falling within the following categories:

- a) a spouse, or a partner considered to be equivalent to a spouse in accordance with national law;
- b) a dependent child, in accordance with national law;

- c) a relative who has shared the same household for at least one year on the date of the transaction concerned;
- d) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a Relevant Person or by a person referred to in point (a), (b) or (c), which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person.

2. For the purposes of the obligations under this Procedure, Relevant Persons are required to inform the Company of the person closely associated with them and, promptly, of any changes to the information previously provided, by means of a specific signed declaration delivered to the Internal Dealing Officer.

Article 3 Relevant transactions

1. The transactions subject to notification (the “**Relevant Transactions**”) are those carried out by Relevant Persons and Persons Closely Associated with Relevant Persons that are referred to in:

- a) Article 19(1) and (7) of MAR;
- b) Article 10(2) of Commission Delegated Regulation (EU) 2016/522.

2. These include, among others, the following transactions involving the financial instruments referred to in Article 1 above:

- a) acquisition, disposal, short sale, subscription or exchange;
- b) acceptance or exercise of a stock option, including of a stock option granted to persons discharging managerial responsibilities or employees as part of their remuneration package, and the disposal of shares stemming from the exercise of a stock option;
- c) entering into or exercise of equity swaps;
- d) transactions in or related to derivatives, including cash-settled transactions;
- e) entering into a contract for difference on a financial instrument of the concerned issuer or on emission allowances or auction products based thereon;
- f) acquisition, disposal or exercise of rights, including put and call options, and warrants;
- g) subscription to a capital increase or debt instrument issuance;
- h) transactions in derivatives and financial instruments linked to a debt instrument of the Company, including credit default swaps;
- i) conditional transactions upon the occurrence of the conditions and actual execution of the transactions, provided that the condition or conditions are fulfilled, that is, when the transaction actually takes place;
- j) automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of convertible bonds to shares;
- k) gifts and donations made or received, and inheritance received;
- l) transactions executed in index-related products, baskets and derivatives, insofar as required by Article 19 of MAR;
- m) transactions executed in shares or units of investment funds, including alternative investment funds (AIFs) referred to in Article 1 of Directive 2011/61/EU of the European Parliament and of the Council, insofar as required by Article 19 of MAR;
- n) transactions executed by the manager of an AIF in which a Relevant Person or a Person Closely Associated with a Relevant Person has invested, insofar as required by Article 19 of MAR;

- o) transactions executed by a third party under an individual portfolio or asset management mandate on behalf or for the benefit of a Relevant Person or a Person Closely Associated with a Relevant Person;
- p) borrowing or lending of shares or debt instruments of the issuer or derivatives or other financial instruments linked thereto;
- q) the pledging or lending of financial instruments by or on behalf of a Relevant Person or a Person Closely Associated with a Relevant Person;
- r) transactions undertaken by persons professionally arranging or executing transactions or by another person on behalf of a Relevant Person or a Person Closely Associated with a Relevant Person, including where discretion is exercised;
- s) transactions made under a life insurance policy, defined in accordance with Directive 2009/138/EC of the European Parliament and of the Council, where:
 - i. the policyholder is a Relevant Person or a Person Closely Associated with a Relevant Person;
 - ii. the investment risk is borne by the policyholder; and
 - iii. the policyholder has the power or discretion to make investment decisions regarding specific instruments contained in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.

Article 4 Transactions exempt from notification obligations

1. Under the legislation in force, transactions are exempt from notification obligations, even where they are Relevant Transactions, until the total amount of transactions carried out by each Relevant Person or by each Person Closely Associated with a Relevant Person exceeds EUR 50,000.00 (fifty thousand euro) within a calendar year; once that amount has been exceeded, all Relevant Transactions must be notified, irrespective of their amount. The total amount is calculated by adding together all transactions relating to the financial instruments. For linked derivative financial instruments, the amount is calculated by reference to the underlying shares.

Article 5 Identification and updating of Relevant Persons and Persons Closely Associated with Relevant Persons

1. Relevant Persons, as identified under this Procedure, are sent the notice set out in **Annex 1** in order to inform them of their obligations under the legislation in force and under this Procedure concerning internal dealing, and to obtain from them information on the Persons Closely Associated with them.

Under the legislation in force, each Relevant Person notifies the Persons Closely Associated with him or her in writing of their obligations (using the suggested template set out in **Annex 2**), attaching a copy of this Procedure, and keeps a copy of the notification.

2. The Internal Dealing Officer, as defined in Article 10 below, updates the list of Relevant Persons and Persons Closely Associated with Relevant Persons.

3. In cases of doubt, the Internal Dealing Officer refers the matter to the Company's Board of Directors for decision.

Article 6 Notification of transactions to the Company by Relevant Persons

1. Relevant Persons and Persons Closely Associated with Relevant Persons must notify the Company and Consob of the Relevant Transactions they have carried out – provided that the threshold set out in Article 4(a) has been exceeded – **within 3 (three) business days** of the date of the transaction.

2. In this regard, since the Company is in turn required to disclose the same information to the public within the same statutory time limit (see Article 8), such persons may make use of the Company for the notifications referred to above. In that case, they must send the notification to the Company promptly and in any event within the strict **time limit of 2 (two) business days** of the transaction, by completing

and sending to the Company the standard notification template under Commission Implementing Regulation (EU) 2016/523, attached to this Procedure as **Annex 5**.

3. The period within which the notification must be made runs from the date on which the transaction was executed, excluding that date.

4. Where, on the other hand, such persons have requested the Company's support in fulfilling their notification obligation, it will be sufficient for them to send the Company by email the details of the transactions carried out, providing the information required under Commission Implementing Regulation (EU) 2016/523 (**Annex 5** to the Procedure).

5. In any event, the information provided to the Company must contain the following:

- the name of the person (natural or legal person) carrying out the transaction (indicating any person through whom it is carried out), together with all of their personal details, specifying the nature of their relationship with the Company;
- the reason for the notification;
- the name of the issuer;
- a description and the identifier of the financial instrument;
- the nature of the transaction(s), including an indication as to whether it is linked to the exercise of share option programmes;
- the date, time and place of the transaction(s);
- the price and volume of the transaction(s).

6. In the case of a pledge whose terms provide for its value to change, the change is disclosed together with the value at the date of the pledge.

7. The notification, preceded by a telephone call, may be sent by email, for the attention of the Internal Dealing Officer, using the following contact details:

- tel: +39 02 8062933 or +39 348 1519223 (Giuseppe Mazza)
- e-mail: internaldealing@itk.it and giuseppe.mazza@kme.com.

8. See also the summary sheet set out in **Annex 6**.

* * *

Should Relevant Persons or Persons Closely Associated with Relevant Persons fail to comply with the mandatory time limits set out above, the Company shall be released from any notification obligation (i.e. to Consob and to the market), which must therefore be fulfilled directly by those persons.

Article 7 Obligation of Relevant Persons to inform Persons Closely Associated with them

Relevant Persons are required to inform the Persons Closely Associated with them of the existence of the conditions under which such persons are subject to the notification obligations laid down in Article 19 of MAR and Article 152-quinquies.1 of the Issuers' Regulation, by delivering to them a copy of this Procedure as indicated in **Annex 2**.

Article 8 Public disclosure of notifications by the Company

8.1 Disclosure to the market by Relevant Persons and Persons Closely Associated with Relevant Persons

The Company discloses the information received pursuant to Article 6 above, in the manner provided for the dissemination of announcements relating to inside information, **by the third business day after the Relevant Transaction was carried out**, in such a way as to enable fast access to that information on a non-discriminatory basis, including on behalf of Relevant Persons and Persons Closely Associated with Relevant Persons who have granted the Company a mandate to that effect. The information is also published on the Company's website.

8.2 *Incomplete information*

Where the Company has entered into the relevant agreement with Relevant Persons and Persons Closely Associated with Relevant Persons, the Company will not make the notifications referred to above on behalf of such persons, and will be released from any obligation relating to those notifications, if the information received is incomplete or deficient.

Relevant Persons and Persons Closely Associated with Relevant Persons, including where no agreement with the Company is in place, bear full and sole responsibility for the accuracy and truthfulness of the information sent to the Company for the purposes of the subsequent statutory disclosures.

The Company may therefore seek recourse against such persons for any costs, sanctions or liability incurred by it as a result of any inaccurate, incomplete or late notification made to the Company.

The same provisions as set out in Article 6 above apply to the notifications referred to in paragraph 8.1.

Article 9 Prohibition on dealing (closed periods)

9.1 Relevant Persons and Persons Closely Associated with Relevant Persons may not conduct any transactions relating to the financial instruments referred to in Article 1 above during the 30 calendar days before the announcement of an interim financial report or a year-end report which the Company is required to make public under the laws and regulations in force from time to time, and until such report has been published.

9.2 Accordingly, these rules do not apply to any quarterly reports published by the Company on a voluntary basis. Where the Company publishes preliminary results, the closed period applies only by reference to the date of publication of the preliminary results and not to that of the final results.

9.3 The Chairman of the Board of Directors may impose stricter restrictions on individual Relevant Persons.

9.4 In the event of extraordinary transactions and on the initiative of the Board of Directors, the Company may impose similar time-limited prohibitions on individual Relevant Persons.

9.5 Any exemptions from the above prohibitions may be granted in advance on an individual basis by the Board of Directors, within the limits and subject to the conditions set out in Article 19(12) of MAR and Articles 7 and 8 of Commission Delegated Regulation (EU) 2016/522 (as amended by Commission Delegated Regulation (EU) 2026/788), namely:

- a) on a case-by-case basis due to the existence of exceptional circumstances, such as severe financial difficulty, which require the immediate sale of shares or of financial instruments other than shares; or
- b) due to the characteristics of the trading involved for transactions made under, or related to, an employee share or saving scheme or an employee scheme relating to financial instruments other than shares, a qualification or entitlement of shares or a qualification or entitlement of financial instruments other than shares, or transactions where the beneficial interest in the relevant security does not change.

9.6 In order to obtain permission for the immediate sale of shares or of financial instruments other than shares pursuant to point (a) above:

- prior to any trading during the closed period, the Relevant Person must provide the Company with a reasoned written request for permission to sell shares or financial instruments other than shares immediately during a closed period;
- the request must contain a detailed description of the considered transaction and an explanation of why the sale of shares or of financial instruments other than shares is the only reasonable alternative to obtain the necessary financing or to meet a financial or tax obligation arising from a situation that existed before the start of the closed period;

- the Company assesses the written request on a case-by-case basis and grants permission for the immediate sale of shares or of financial instruments other than shares only where the circumstances of the transaction are considered exceptional.

9.7 By way of derogation from the prohibitions set out in paragraph 9.1 above, Relevant Persons and Persons Closely Associated with Relevant Persons may carry out transactions or trade activities which do not concern active investment decisions undertaken by them, or which result solely from external factors or actions of third parties, or which are transactions or trade activities, including the exercise of derivatives, based on predetermined terms.

Article 10 Internal Dealing Officer

10.1 By means of this Procedure, the Company has designated its Financial Reporting Officer (*Dirigente Preposto*) as the person responsible for the internal dealing activities described in the Procedure (the “**Internal Dealing Officer**”). In the event of the absence or unavailability of the Internal Dealing Officer, the relevant functions will be performed by an Executive Director (the “**Deputy Internal Dealing Officer**”).

10.2 The Internal Dealing Officer is responsible for:

- keeping and updating the list of Relevant Persons and Persons Closely Associated with Relevant Persons, in accordance with Article 5 above;
- receiving, managing and disclosing to the public the information that the Company is required by law to disclose under the internal dealing rules;
- the notifications required by the provisions in force and by this Procedure in respect of Relevant Transactions carried out by Relevant Persons and Persons Closely Associated with Relevant Persons who have entered into a specific agreement to that effect with the Company.

10.3 The Internal Dealing Officer is responsible for the secretarial activities and for filing the documentation needed to ensure the proper functioning of this Procedure.

Article 11 Sanctions

11.1 In addition to the sanctions provided for by the legislation in force, and without prejudice to the Company’s right to seek recourse for any damage or liability it may incur as a result of conduct in breach of this Procedure, failure to comply with the notification obligations or with the restrictions on dealing may result, for employees, in the disciplinary sanctions provided for by the Company’s 231 Model and by the applicable contractual rules, while for other persons the Board of Directors reserves the right to resolve on any measures, commensurate with the seriousness of the breach.

11.2 Furthermore, in the event of non-compliance with this Procedure, the Relevant Person shall indemnify the Company against any loss, expense, cost, charge or liability that has arisen or may arise for the Company from such non-compliance. In the event of non-compliance with this Procedure by Persons Closely Associated with Relevant Persons, the relevant Relevant Person shall be liable to the Company for any loss, expense, cost, charge or liability that has arisen or may arise for the Company from such non-compliance.

11.3 Compliance with the provisions of this Procedure does not in any event relieve the persons to whom it applies from the obligation to comply with the applicable legislation in force from time to time, including, by way of example only, the rules on the disclosure of major holdings and those on insider dealing and market manipulation.

Article 12 Processing of personal data

Pursuant to the personal data protection legislation in force from time to time, Relevant Persons and Persons Closely Associated with Relevant Persons irrevocably consent to the processing of the data required under the legislation referred to repeatedly herein, including where such processing is carried out through third parties, solely for the purpose of complying with that legislation.

Article 13 Entry into force of the Procedure

13.1 The Procedure set out in the preceding Articles enters into force on 1 October 2026, without any break in continuity with the procedure previously in force.

13.2 Delivery of a copy of this Procedure to each Relevant Person entails full knowledge and acceptance by that person of the provisions contained therein. Relevant Persons are required to deliver a copy of this Procedure to the Persons Closely Associated with them, who are presumed to have knowledge of it as from the time their names are notified to the Company.

* * * * *

Annexes to the Procedure

1. Template notice from the Company to Relevant Persons;
2. Template notice from Relevant Persons to Persons Closely Associated with them;
3. Template form for Persons Closely Associated with Relevant Persons;
4. Template letter to be signed by Relevant Persons and Persons Closely Associated with Relevant Persons granting a mandate to the Company;
5. Template for the notification of transactions to the Company by Relevant Persons and Persons Closely Associated with Relevant Persons;
6. Summary sheet for submitting notifications.

* * * * *

Annex 1 – Template notice from the Company to Relevant Persons

[On KME Group S.p.A. letterhead]

Milan, [date]

Dear Mr/Ms [•],

We hereby inform you that your name has been included in the list of “Relevant Persons” pursuant to Article 3(1), point (25), of Regulation (EU) No 596/2014 (“**MAR**”).

For the purposes of complying with the applicable legislation, we enclose the procedure on internal dealing adopted by our company (the “**Company**”) and invite you to read it carefully and to comply with all of its provisions.

In particular, we draw your attention to your obligations to:

- 1) provide the Company with the identification details of the Persons Closely Associated with you, as defined in Article 2 of the Procedure; to that end, please return **Annex 3** to the Procedure, duly completed, as soon as possible, and keep us promptly informed of any changes to the details indicated therein;
- 2) notify the Company of Relevant Transactions, as defined in Article 3 of the Procedure, by completing the template set out in **Annex 5** to the Procedure, within the strict time limit set out in Article 6 of the Procedure;
- 3) comply with the absolute prohibition on dealing during the so-called “closed periods”, in accordance with Article 9 of the Procedure.

Should you wish to grant the Company a mandate to make the notifications of Relevant Transactions on your behalf, please return a signed copy of **Annex 4**.

Yours sincerely,

KME Group S.p.A.

Enclosure:

- Procedure on *Internal Dealing*

Annex 2 – Template notice from Relevant Persons to Persons Closely Associated with them

Milan, [date]

Dear [•],

I hereby inform you that, pursuant to Article 3(1), point (26), of Regulation (EU) No 596/2014 (“**MAR**”), I have identified you as a person closely associated with me in my capacity as a Relevant Person of KME Group S.p.A. (the “**Company**”) within the meaning of Article 3(1), point (25), of MAR.

For the purposes of complying with the applicable legislation, I enclose the internal dealing procedure currently in force at the Company, in order to inform you of your obligations under the law and under that procedure.

In particular, I draw your attention to the following obligations:

- 1) to send me your identification details (first name, surname, place and date of birth) as soon as possible;
- 2) to notify the Company and Consob of Relevant Transactions, as defined in Article 3 of the procedure, within the time limit set out in Article 6 of the procedure, by completing the template set out in **Annex 5** to the procedure;
- 3) to comply with the absolute prohibition on dealing during the so-called “closed periods”, in accordance with Article 9 of the procedure.

In order to comply with the applicable legislation, please return this letter to me duly signed by way of acknowledgement of receipt.

Kind regards,

Signature of the Relevant Person

Acknowledgement of receipt

Place, Date

Signature

Enclosure:

- Procedure of the Company on *internal dealing*

Annex 3 – Template form for Persons Closely Associated with Relevant Persons

IDENTIFICATION DETAILS OF PERSONS CLOSELY ASSOCIATED WITH _____

Date: _____

Table relating to the persons referred to in Article 2, Section B, paragraph 1, points (a), (b) and (c)

First name and surname	Tax code (codice fiscale)	Place of birth	Date of birth	Residence	Tel.	Email

Table relating to the entities (legal persons, trusts or partnerships) referred to in Article 2, Section B, paragraph 1, point (d)

Name	Tax code (codice fiscale)	VAT number	Contact person's tel.	Contact person's email

Signed _____

Annex 4 – Template letter to be signed by Relevant Persons and Persons Closely Associated with Relevant Persons authorising the Company to make notifications on their behalf

KME Group S.p.A.
Foro Buonaparte 44
20121 Milan
Italy

By registered letter with return receipt

Subject: Obligations under Article 19 of MAR

In acknowledging that my name has been included in the list of so-called “relevant persons” pursuant to Article 3(1), point (25), of Regulation (EU) No 596/2014 (“**MAR**”), I expressly declare that I wish to exercise the option of granting the Company a mandate to make the notifications required of me under the Company’s “Procedure on Internal Dealing” (the “**Procedure**”).

In this regard, I confirm that I am aware of, and consequently accept, the relevant provisions and consequences set out in the Procedure, which has been communicated to me by the Company, and I accordingly undertake to comply with the terms, conditions and deadlines set out in the Procedure for the purposes of the performance of this mandate. Although the processing is provided for by specific statutory provisions, I nevertheless irrevocably accept the processing of the data required under the Procedure, including where carried out through third parties and including for a period exceeding the five years prescribed by law.

[Place, Date]

[Signature]

Annex 5 – Template for the notification of transactions to the Company by Relevant Persons and Persons Closely Associated with Relevant Persons

1	DETAILS OF THE PERSON DISCHARGING MANAGERIAL RESPONSIBILITIES / PERSON CLOSELY ASSOCIATED	
a) ¹	Name	<p><i>For natural persons:</i> Name: Surname:</p> <p><i>For legal persons:</i> Full name:</p>
2	Reason for the notification	
a)	Position/Status	<p><i>Person discharging managerial responsibilities:</i></p> <p><i>For natural persons:</i> ☐</p> <p>Name: Surname:</p> <p><i>Person closely associated</i> ☐</p> <p>Indication that the notification concerns a person closely associated with:</p> <p><i>For natural persons:</i> Name: Surname:</p> <p><i>For legal persons:</i> Full name:</p>
b) ²	Initial notification/amendment	<p>Initial notification: ☐</p> <p>Amendment to prior notification:</p> <p>Reason for the amendment:</p>
3	Details of the issuer	
a) ³	Name	
b) ⁴	LEI	
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each	

¹ Details of the person conducting the transaction

[For natural persons: name and surname.]

[For legal persons: full name, including legal form as provided for in the register where it is incorporated, if applicable.]

² [Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]

³ [Full name of the entity]

⁴ [Legal Entity Identifier code in accordance with ISO 17442 LEI code.]

	type of transaction; (iii) each date; and (iv) each place where transactions have been conducted					
a)	Description of the financial instrument, type of instrument Identification code					
b) ⁵	Nature of the transaction					
c) ⁶	Price(s) and volume(s)	<table border="1"> <thead> <tr> <th>Price(s)</th> <th>Volume(s)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Price(s)	Volume(s)		
Price(s)	Volume(s)					
d) ⁷	Date of the transaction					
e)	Place of the transaction	Name of the trading venue: Identification code: «Outside a trading venue»: ☐				

⁵ [Purchase, sale, subscription or exchange].

⁶ [Where more than one transaction of the same nature is executed on the same day and at the same place, indicate in aggregated form the total volume and the weighted average price of those transactions].

⁷ [Date of the particular day of execution of the notified transaction. Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]

Instructions for notification to Consob and public disclosure of information on transactions carried out by Relevant Persons

1. The form set out below, containing the information on transactions carried out by Relevant Persons and Persons Closely Associated with Relevant Persons, is used:

- a) by Relevant Persons for notification to the listed issuer, where so agreed between the Relevant Person and the listed issuer;
- b) by Relevant Persons, or by the listed issuer where so agreed between the Relevant Person and the listed issuer, for notification to Consob;
- c) by Relevant Persons for public disclosure, or by the listed issuer for the same purpose where so agreed with the Relevant Persons;
- d) by the listed issuer for submission to the authorised storage mechanism, where there is an agreement for the publication referred to in point (c) above.

2. The notifications referred to in point 1(a) are made using means established by the listed issuer that ensure immediate receipt of the information, such as email or other electronic means.

3. The notifications to Consob referred to in point 1(b) are made in one of the following two ways:

- a) by certified email (*posta elettronica certificata* – PEC) to internaldealing@pec.consob.it (where the sender is required to have a PEC address), by ordinary email to protocollo@consob.it, or by other means established by Consob on its website;

or

- b) through the procedure used by the listed issuer pursuant to Article 65-septies of the Issuers' Regulation for the storage and filing of information, where there is an agreement with the listed issuer.

4. The public disclosures referred to in point 1(c) are made by Relevant Persons through an authorised system for the dissemination of regulated information (SDIR) or, where made by the listed issuer on behalf of Relevant Persons as specifically agreed, by sending the above form in the manner provided for in the Issuers' Regulation.

5. Submissions to the authorised storage mechanism referred to in point 1(d) are made by sending the form set out below in XML format, available on Consob's website, in the manner provided for in Title II, Chapter I of the Issuers' Regulation.

Annex 6 – Summary sheet for submitting notifications

Name of the Internal Dealing Officer

The Internal Dealing Officer pursuant to Article 10 of the Procedure is the Financial Reporting Officer, Giuseppe Mazza, who may be contacted for information and clarification at the Company's offices at Foro Buonaparte 44, Milan, on (+39) 02 8062944 or (+39) 348 1519223.

In his absence or unavailability, Valentina Mariani may be contacted on (+39) 02 8062933.

Technical arrangements for sending notifications

The forms relating to the notifications under the Procedure may be sent by email to:

- internaldealing@itk.it and giuseppe.mazza@kme.com.