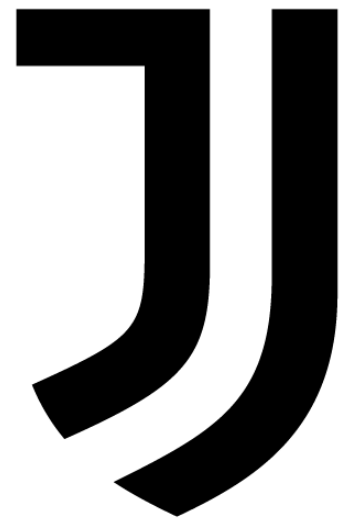


PROCEDURE
Internal Dealing





1 INTRODUCTION

- 1.1 This procedure (the “**Procedure**”) regulates the reporting obligations and restrictions relating to transactions concerning financial instruments issued by Juventus Football Club S.p.A. (“**Juventus**” or the “**Company**” or the “**Issuer**”) as well as the other financial instruments related to these, implemented by the Internal Dealing Persons (as defined below) in compliance with the contents of the regulations set out in Article 19 of Regulation (EU) No. 596/2014 (“**Regulation 596/2014**” or the “**MAR**”) and the respective European implementing provisions.
- 1.2 The Procedure is aimed at (i) identifying the Internal Dealing Persons (as defined below) required to make the communications foreseen by the applicable regulations on internal dealing, (ii) informing the Internal Dealing Persons that they have been identified, of the related obligations and the methods for making the communications foreseen by the regulation and the legislation, and (iii) identifying the person responsible for receiving, managing and disseminating to the market the above communications.
- 1.3 This Procedure must be applied in compliance with all European and national standards of a legislative regulatory nature, applicable at any given time while also guaranteeing observance of ESMA (European Securities and Markets Authority) and CONSOB guidelines where applicable.
- 1.4 The Key Persons (as defined below) must comply with the Procedure and guarantee its knowledge and compliance by the respective Persons Associated with the Key Persons (as defined below). Compliance with the rules envisaged by this Procedure does not exonerate the Internal Dealing Persons (as defined below) from the obligation to respect the other European and national rules, even regulatory, in force at the time in that regard. Therefore, knowledge of the content of this Procedure cannot be understood as replacing full knowledge of the applicable regulations in force in that regard, to which reference is necessarily made.
- 1.5 For any aspect not explicitly envisaged in this Procedure, reference is expressly made to the provisions on the dissemination of inside information, price sensitive information and other corporate information, envisaged by the Regulation of the markets organised and managed by Borsa Italiana S.p.A. and by the relative Instructions (the “**Borsa Regulation**” and the “**Instructions**”, respectively) and by the applicable legal and regulatory provisions.
- 1.6 This Procedure was approved by the Company’s Board of Directors and was last updated on 7th October 2026.

2 DEFINITIONS

In addition to the definitions contained in other paragraphs, the following definitions apply for the purposes of this Procedure:

“**Shares**” refers to the ordinary shares of the Company.

“**Borsa Italiana**” refers to Borsa Italiana S.p.A., with registered office in Milan, Piazza degli Affari No. 6.

“**CFO**” refers to the Chief Financial Officer of the Company in office at the time.

“**Board of Statutory Auditors**” refers to the Board of Statutory Auditors of the Company in office.

“**Board of Directors**” refers to the Board of Directors of the Company in office.

“**Subsidiaries**” refers to the companies controlled by the Company pursuant to Article 2359 of the Italian Civil Code.

“**CONSOB**” refers to Commissione Nazionale per le Società e la Borsa (Italian Companies and Exchange Commission), established by Italian Law No. 216 of 7 June 1974, with registered office in Rome, via G.B. Martini No. 3.

“**Date of Performance**” refers to the day on which:

- (a) the contract for the purchase, sale or exchange, even free of charge, of securities or the repurchase agreement was finalised;
- (b) the assignment of the Financial Instruments, due following the exercise of financial instruments, even non-listed, which attribute the right to subscribe, purchase or sell Shares as well as the



exercise of the right to convert convertible bonds (even *cum warrants*) was executed;

- (c) the assignment of Financial Instruments, following the performance of capital operations, has been executed.

“**EXM**” refers to Euronext Milan, the regulated market organised and managed by Borsa Italiana.

“**Investor Relations Department**” refers to the Investor Relations Department of the Company, which is responsible for the correct implementation of this Procedure with the support of Legal Department, for the correct and timely identification of Key Persons.

“**Working Day**” refers to any day (other than Saturday and Sunday) on which the banks are open for normal business operations in Turin.

“**Inside Information**” refers to information of a precise nature that has not been made public, concerning, directly or indirectly, 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 such Financial Instruments or on the prices of related derivative financial instruments.

In particular, by information of a “*precise nature*” we are hereby referring to information that:

- a) indicates a set of existing circumstances or those, which may reasonably be expected to come into existence, or an event, which has occurred or may reasonably be expected to occur; and
- b) is sufficiently specific as to make it possible to draw conclusions on the possible effect of the set of circumstances or the event indicated in point (a) on the prices of the Financial Instruments or of the related derivative financial instruments. In this regard, in the case of a protracted process intended to bring about a particular circumstance or a particular event, or in the case of a protracted process that brings them about, such future circumstance or future event, as well as the intermediate steps of the same process, related to the bringing about or determination of the future circumstance or event, may be considered as information of a specific nature.

In addition, information that, if made public, could have a “significant effect” on the prices of the Financial Instruments refers to information, which a reasonable investor would presumably use as one of the elements on which to base its investment decisions.

An intermediate step in a protracted process is considered Inside Information if it meets the criteria set forth in this definition. For example, information relating to an event or a series of circumstances constituting an intermediary phase in a protracted process may regard:

- a) the status of contractual negotiations;
- b) contractual conditions agreed upon on a provisional basis;
- c) the possibility of placing financial instruments;
- d) the conditions under which such instruments are sold;
- e) the provisional conditions for the placement of financial instruments;
- f) the possibility of a financial instrument being included in an index; and
- g) the exclusion of a financial instrument from an index.

3 INTERNAL DEALING PERSONS

3.1 With regard to the reporting obligations indicated in this Procedure, the “**Internal Dealing Persons**” collectively refer to:

- a) the persons indicated in Article 3(1)(25) of the MAR (the “**Key Persons**”), namely:
 - (i) the members of the Company’s Board of Directors;
 - (ii) the members of the Company’s Board of Statutory Auditors;



- (iii) the Company's senior managers who, despite not being included among the persons referred to in points (i) and (ii) above, have regular access to Inside Information that directly or indirectly concerns the Company and have the power to adopt management decisions that may influence the future evolution and prospects of the Company;
- b) all persons closely associated with the Key Persons (hereinafter, the **"Persons Associated with the Key Persons"**), namely:
 - (i) the spouse or partner equated to the spouse under Italian law;
 - (ii) dependent children under Italian law;
 - (iii) a relative who has shared the same residence for at least one year at the date of the transaction in question;
 - (iv) the legal entities, partnerships or trusts, whose management responsibilities have been charged to a person who performs administration, control or management functions or by a person indicated under this letter b) points (i), (ii) or (iii), or is directly or indirectly controlled by that person, or incorporated for its benefit, or whose economic interests are substantially equivalent to the interests of said person.

4 IDENTIFICATION OF INTERNAL DEALING PARTIES

- 4.1 The Person in Charge indicated in the following Article 5 of this Procedure identifies the Key Persons and, based upon the information communicated by the same, identifies the Persons Associated with the Key Persons.
- 4.2 Based upon the information received, the Person in Charge drafts a list of the Internal Dealing Persons (the **"List"**). The Person in Charge stores the List.
- 4.3 The Person in Charge promptly notifies in writing the Key Persons of their registration in the List and the related reporting obligations envisaged by law and by the Procedure. The recipients of that communication, which must be made according to the template contained in Annex A, must provide to the Company a copy signed for acknowledgement, notwithstanding the fact that, even if that does not occur, the Key Persons will be understood to be aware of the above.
- 4.4 The Key Persons must inform the Persons Associated with the Key Persons of the reporting obligations envisaged by law and by this Procedure, by way of written communication (which must be made using the template contained in Annex B) retaining a copy of that communication. The Key Persons inform the Persons Associated with the Key Persons of the changes and additions to the Procedure and send them an updated copy of the same.
- 4.5 In order to facilitate the correct keeping and updating of the List, the Key Persons communicate promptly to the Person in Charge any change or update of the personal details of the Persons Associated with the Key Persons.
- 4.6 The Internal Dealing Persons must provide to the Company all information necessary to fulfil the obligations indicated in this Procedure and in accordance with the law. Neither the Company nor the Person in Charge may be considered liable for breaches of the disclosure obligations imposed upon the Company in accordance with this Procedure, deriving from omitted, incomplete, incorrect or delayed communication by the Internal Dealing Persons.
- 4.7 The Person in Charge guarantees the confidentiality of the communications received and of the List, also preventing anyone without authorisation from having access to it.

5 PERSON IN CHARGE OF RECEIVING, MANAGING AND DISSEMINATING INFORMATION TO THE MARKET

- 5.1 The Person in Charge of receiving, managing, disclosing and disseminating to the market the information referred to in this document, as well as updating the Internal Dealing Persons is the Investor Relations Department (the **"Person in Charge"**), with support provided by the Legal Department of the Company. The Person in Charge:



- (a) oversees the correct application of the Procedure;
- (b) analyses the maintenance over time of the requirements of solidity and functionality of the Procedure;
- (c) deals with the update to the Procedure;
- (d) receives the information sent by the Internal Dealing Persons in accordance with the Procedure;
- (e) manages the information sent by the Internal Dealing Persons and stores it in a specific archive;
- (f) arranges the distribution to the market of the communications on the Key Transactions within the terms established by this Procedure;
- (g) informs the Key Persons regarding the adoption of the Procedure, its amendments and additions.

5.3 The Person in Charge must also inform the Board of Directors and the Board of Statutory Auditors of the Company of the Internal Dealing Persons, where requested by them.

5.4 The Board of Directors has the right to identify, for limited periods of time, other Key Persons, in relation to the activity performed or the assigned role. The Person in Charge is promptly informed of this identification and, where foreseen, of any time limitations involved. The Person in Charge, as soon as additional Key Persons are identified, registers them in the List and duly notifying them without delay, according to the methods envisaged by paragraph 4.3 of this Procedure.

6 DISCLOSURE OBLIGATIONS OF INTERNAL DEALING PERSONS

6.1 Internal Dealing Persons inform the Company and CONSOB according to the methods and terms specified, respectively, in paragraphs 6.5 and 6.6, regarding all transactions (the **"Key Transactions"**) carried out on their behalf concerning:

- (a) Shares or debt instruments of the Company;
- (b) derivative instruments;
- (c) financial instruments related to them, as identified in accordance with Article 3(2)(b) of Regulation 596/2014, (jointly, the **"Financial Instruments"**).

6.2 The obligations referred to in Paragraph 6.1 apply if the total amount of the Key Transactions reaches the threshold of Euro 50,000 in a calendar year. More specifically, Key Transactions are all subsequent transactions that involve financial instruments and have been set up by Internal Dealing Persons that take place once a sum of Euro 50,000 (or any other amount identified by the competent authority pursuant to Article 19, paragraph 2, of the MAR) has been reached.

6.3 The Key Transactions include, by way of example:

- (a) acquisition, disposal, short sale, subscription or exchange;
- (b) acceptance or exercise of a right of option, including a right of option granted to a Key Person or to employees as part of the remuneration due to them, and the disposal of shares deriving from the exercise of a right of option;
- (c) participation in exchange contracts connected to share indices or the exercise of those contracts;
- (d) transactions in derivative instruments or instruments related to them, including transactions with cash settlement;
- (e) participation in a contract for difference relating to a Financial Instrument;
- (f) acquisition, disposal or exercise of rights, including put and call options, and of warrants;
- (g) subscription of a capital increase or issuance of bonds or credit securities;
- (h) transactions in derivative instruments and financial instruments related to a receivable of the Company, including credit default swaps;
- (i) conditional transactions subject to the occurrence of conditions and the effective performance



of the transactions;

- (j) automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of convertible bonds into shares;
- (k) donations made or received and legacies received;
- (l) transactions carried out in products, baskets and indexed derivative instruments, if envisaged by Article 19 of the MAR;
- (m) transactions carried out in shares or stocks of investment funds, including alternative investment funds (“AIF”) indicated in Article 1 of Directive 2011/61/EU, if envisaged by Article 19 of the MAR;
- (n) transactions carried out by the manager of an AIF in which the Key Person has invested, if envisaged by Article 19 of the MAR;
- (o) transactions carried out by third parties as part of an asset management mandate or a portfolio on an individual basis on behalf or in favour of an Internal Dealing Person;
- (p) the receipt or granting of a Financial Instrument as a loan.

The Key Transactions also include:

- (a) the constitution on pledge or loan of financial instruments by or on behalf of an Internal Dealing Person. To that end, it is not necessary to notify a pledge of financial instruments, or another similar guarantee, in connection with the deposit of financial instruments in a custody account, unless and until that pledge or other similar guarantee is intended to obtain a specific credit facility;
- (b) transactions carried out by those who arrange or execute transactions professionally or by anyone else on behalf of an Internal Dealing Person, even when discretion is exercised. Transactions executed on Shares or debt instruments of the Company or on derivative products or other financial instruments related to them, by managers of a collective investment body in which the Internal Dealing Person has invested, are not subject to the notification obligation if the manager of the collective investment body acts in complete discretion, which excludes the possibility that it receives instructions or suggestions of any nature on the composition of the portfolio, directly or indirectly, from investors of that collective investment body;
- (c) transactions carried out as part of life insurance, defined in accordance with Directive 2009/138/EC, in which: (i) the policyholder of the insurance is an Internal Dealing Person; (ii) the investment risk is borne by the policyholder; and (iii) the policyholder has the power or the discretion to take investment decisions in relation to specific instruments contemplated by the life insurance in question, or to carry out operations regarding specific instruments of that life insurance. To the extent that a policyholder of an insurance contract is required to notify the operations in accordance with this Procedure, the insurance company does not have any notification obligation.

6.4 For the purposes of calculating the total amount indicated in paragraph 6.1 above:

- (a) the value of the transactions should be calculated in absolute value, summing the positive transactions to the negative ones (without compensation), irrespective of the type of Financial Instrument subject to the transactions carried out, singularly, by each Internal Dealing Person within a calendar year;
- (b) the value of the transactions related to derivative financial instruments indicated by Article 1, paragraph 3 of the Italian Consolidated Law on Finance should be calculated with reference to the so-called “notional market value”, calculated as the product between the number of shares controlled by the instrument and the official price of the underlying asset, identified at the transaction date;
- (c) the value of the transactions should be calculated adding the transactions carried out on behalf of each Key Person or, as appropriate, of each Person Associated with the Key Persons.

6.5 The Internal Dealing Persons communicate the Key Transactions (the “**MAR Communications**”) to the Company - only by email addressed to the Person in Charge at the address



internaldealing@juventus.com – within 3 (three) Working Days from the Date of Performance of the Key Transaction. The Communications must be drafted according to the template indicated in Annex C. The Company may allow the Key Persons to send the MAR Communications also on behalf of the Persons Associated with the Key Persons.

- 6.6 The Internal Dealing Persons submit the MAR Communications to CONSOB, by the third Working Day after the Date of Performance of the Key Transaction, by way of the certified email service at the address internaldealing@pec.consob.it (if the sender is subject to the obligation to have certified email) or by email to the address protocollo@consob.it, specifying as the recipient “Markets Information and Rating Office” and indicating at the start of the subject “MAR Internal Dealing”.
- 6.7 Having received the MAR Communications, the Person in Charge prepares the communication to the public indicated in paragraph 6.8 below. The text of the aforementioned communication must be submitted to the Company’s CFO for final approval before being sent via SDIR.
- 6.8 The Company communicates, by sending a notice by way of SDIR - *Sistemi di Diffusione delle Informazioni Regolamentate* (Regulated Information Dissemination Systems), the information contained in the MAR Communications and makes it promptly available to the public on its internet website within 2 Working Days of the receipt of the MAR Communications in accordance with Paragraph 6.5.
- 6.9 The disclosure obligations of the Key Transactions envisaged by this Procedure do not exist in the case of transactions relating to financial instruments connected to shares or debt instruments of the Company if, at the time of the transaction, one of the following conditions is satisfied:
 - (a) the financial instrument is constituted by a stake or share of a collective investment body in which the exposure to the shares or debt instruments of the Company does not exceed 20% of the assets held by the collective investment body;
 - (b) the financial instrument provides exposure to a portfolio of assets in which the exposure to shares or debt instruments of the Company does not exceed 20% of the assets of the portfolio; or
 - (c) the financial instrument is constituted by a stake or share of a collective investment body or it provides exposure to a portfolio of assets and the Internal Dealing Person does not know, and could not have known, the composition of the investments or the exposure of that collective investment body or portfolio of assets in relation to the shares or debt instruments of the Company, and in addition there are no reasons to lead that person to believe that the shares or debt instruments of the Company exceed the thresholds indicated in letter a) or b).

If information is available in relation to the composition of the investment of the collective investment body or the exposure to the portfolio of assets, the Internal Dealing Person makes all reasonable efforts to use that information.

7 LIMITATIONS ON THE COMPLETION OF TRANSACTIONS CARRIED OUT BY KEY PERSONS (“BLACK-OUT PERIODS”)

- 7.1 It is prohibited for the Key Persons to carry out, directly or by means of intermediaries, on their own behalf or on behalf of third parties, Key Transactions within 30 calendar days before the approval, by the Board of Directors, of an interim financial report or end of year report, which the Company is required to make public according to (a) the EXM rules or (b) Italian law.
- 7.2 The Company may allow the above prohibition not to apply in the cases provided for by the MAR and in the relevant delegated and implementing acts.
- 7.3 The Board of Directors of the Company reserves the right to introduce further limitations, to all or some of the Key Persons and for the period of time deemed necessary, with reference to the completion of all or some of the Key Transactions. In this case, the Person in Charge will be responsible for communicating to the Key Persons the start and end date of the period in which it is prohibited for the Key Persons to complete the aforementioned Key Transactions.

8 PERSONAL DATA PROCESSING



- 8.1 For the purposes of the Procedure and pursuant to the applicable legal obligations, the Company, as Data Controller, may be required to process personal data of the Key Persons in compliance with Regulation (EU) 2016/679.
- 8.2 Furthermore, the Company will provide the Key Persons with the information necessary to ensure correct and transparent processing pursuant to and in accordance with Article 13 of Regulation (EU) 2016/679 together with the letters referred to in Annexes A and/or B (as appropriate).
- 8.3 All requests regarding any information and/or clarification regarding the processing of your personal data may be addressed directly to the Data Controller by sending an e-mail to the following address: privacy@juventus.com

9 MODIFICATION AND PUBLICATION OF THE PROCEDURE

- 9.1 The provisions of the Procedure will be updated and/or supplemented by and under the responsibility of the Company's Board of Directors, taking into account any applicable legal and regulatory provisions or specific requests made by the supervisory authorities, as well as application experience and market practice accrued over time on the matter. The Chief Executive Officer is empowered to make formal and non-substantial changes to this Procedure.
- 9.2 The amendments and/or additions to the provisions shall be disclosed to the Key Persons with an indication of the effective date of the new or amended provisions. The Key Persons will be responsible for communicating the amendments and/or additions regarding the Persons Associated with the Key Persons.
- 9.3 This Procedure is published on the Company's website.

10 VIOLATIONS AND LIABILITIES

- 10.1 Any failure by the Internal Dealing Persons to respect the requirements contained in this Procedure may entail the violation of the obligations borne by the Company as an issuer of shares admitted to trading on the EXM and, notably, the application of various types of penalties against the Company (such as the application of fines, revocation of admission of the Shares on the EXM and publication of the order by which the fine is applied).
- 10.2 Any abuse of Inside Information and market manipulation constitute criminal offences and may give rise to corporate liability for the Company in accordance with Article 187-*quinquies* of the Italian Consolidated Law on Finance and Article 25-*sexies* of Italian Legislative Decree 231/2001.
- 10.3 When, due to the failure of the Internal Dealing Persons to respect the requirements contained in this Procedure, the Company is accused of violating the Borsa Regulation and/or the Instructions, or other legal or regulatory provisions (each a "**Violation**"), the Company itself reserves the right to take action against the responsible Internal Dealing Persons, to be held harmless and indemnified, to the maximum extent permitted by law, for any cost, expense, charge or liabilities whatsoever arising from or in any event connected to such Violations, as well as to receive compensation for any and all greater damages.
- 10.4 The Company's Board of Directors is the body responsible for taking the appropriate measures in the case of any violations of the Procedure.
- 10.5 If the party that has committed a violation of this Procedure is:
 - (a) one of the members of the Board of Directors, the director concerned can no longer participate in the discussions aiming to confirm the existence and extent of the violation, or the adoption of the ensuing measures;
 - (b) the majority of the members of the Board of Directors, the Board of Statutory Auditors is the body responsible for taking the appropriate measures;
 - (c) an employee, the violation is classified as a disciplinary offence. In that case, the methods of disputing the violations of the Procedure and the application of the consequential penalties will occur in full respect of the provisions indicated in the applicable law and in compliance with what



is established by agreements and employment contracts, where applicable.

- 10.6 Any liability of the Issuer for lack of, incomplete or delayed fulfilment, by the Internal Dealing Persons, of the reporting obligations imposed upon them by existing regulations is excluded.

11 IMPLEMENTATION OF THE PROCEDURE

- 11.1 This Procedure, in the updated version, shall come into force on 8th October 2026.



ANNEX A

TEMPLATE FOR COMMUNICATION TO KEY PERSONS

_____, _____

RE: Communication in accordance with existing regulations and the "*Internal Dealing Procedure of Juventus Football Club S.p.A.*". Insertion into the list of Internal Dealing Persons

Dear _____,

We hereby inform you that, in compliance with the procedure on *internal dealing* (the "**Internal Dealing Procedure**") adopted by Juventus Football Club S.p.A. (the "**Company**" or "**Juventus**") in compliance with the regulations set out in Article 19 of Regulation (EU) No. 596/2014 and the respective European implementing provisions, you have been inserted into the list of Internal Dealing Persons (as defined in the Internal Dealing Procedure) of the Company (the "**List**").

For the obligations consequent to that insertion and for the respective operational aspects, we refer to the contents of the Internal Dealing Procedure (attached hereto) and the regulations cited therein. We also remind you that any abuse of inside information and market manipulation constitute offences subject to criminal and administrative sanctions in accordance with the regulations in force.

We also inform you that you are required to communicate in writing to the persons closely associated with you (as identified in the Internal Dealing Procedure) the obligations upon the same in accordance with the internal dealing regulations and the Internal Dealing Procedure, using for that purpose the template attached to it, retaining a copy of that communication.

Please confirm acknowledgement and acceptance of this communication as well as the attached Internal Dealing Procedure, by signing a copy of the declaration included below to be returned to the address internaldealing@juventus.com.

* * *

Please do not hesitate to contact us if you require any further information. Kind regards,

The Person in Charge

(Enc. as above)



☐ The undersigned _____ born in _____ on _____, tax code _____,

ACKNOWLEDGES

to have been inserted in the List of Internal Dealing Persons in accordance with the Internal Dealing Procedure adopted by the Company and

DECLARES

to be aware of the obligations envisaged by EU and domestic legislation applicable each time on *internal dealing* and to have received adequate information, as well as a full copy of the Internal Dealing Procedure of the Company and to accept its content, undertaking to respect its requirements and to communicate them to the persons classified as Associated Persons in accordance with the existing regulations and the Internal Dealing Procedure.

The undersigned undertakes, in particular, to: (i) notify in writing the Internal Dealing Procedure to the persons closely associated with the same; (ii) retain a copy of the notification. By signing this communication, the undersigned confirms to have fulfilled the aforementioned obligations.

The undersigned communicates the following list of persons closely associated with the same.

LIST OF PERSONS ASSOCIATED WITH THE KEY PERSON			
SPOUSE OR PARTNER EQUATED TO SPOUSE PURSUANT TO ITALIAN LAW			
Surname and name	Date and place of birth	Tax code	
DEPENDENT CHILDREN UNDER ITALIAN LAW			
Surname and name	Date and place of birth	Tax code	
RELATIVE WHO HAS SHARED THE SAME RESIDENTIAL ADDRESS FOR AT LEAST ONE YEAR			
Surname and name	Date and place of birth	Tax code	
LEGAL PERSONS, PARTNERSHIPS OR TRUSTS WHOSE MANAGEMENT RESPONSIBILITIES ARE TAKEN ON BY THE KEY PERSON			
Company name	Registered office	Tax code and VAT No.	Role covered (and indication of the Person Associated with the Key Person)



LEGAL PERSONS, PARTNERSHIPS OR TRUSTS CONTROLLED DIRECTLY OR INDIRECTLY BY THE KEY PERSON OR BY ONE OF THE ASSOCIATED PERSONS LISTED ABOVE			
Company name	Registered office	Tax code and VAT No.	Investment stake (and indication of the Person Associated with the Key Person)
LEGAL PERSONS, PARTNERSHIPS OR TRUSTS INCORPORATED TO THE BENEFIT OF THE KEY PERSON OR BY ONE OF THE ASSOCIATED PERSONS LISTED ABOVE			
Company name	Registered office	Tax code and VAT No.	Person Associated with the Key Person
LEGAL PERSONS, TRUSTS AND PARTNERSHIPS WHOSE ECONOMIC INTERESTS ARE SUBSTANTIALLY EQUIVALENT TO THOSE OF THE KEY PERSON OR ONE OF THE ASSOCIATED PERSONS LISTED ABOVE			
Company name	Registered office	Tax code and VAT No.	Person Associated with the Key Person

For acknowledgement and acceptance of the content of this communication.

Date, _____, _____

Signature



PRIVACY POLICY pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Pursuant to and for the purposes of Articles 13 and 14 of European Regulation No. 2016/679 (hereinafter “Regulations”), Juventus FC SpA, as Data Controller, wishes to inform the Internal Dealing Persons (the “Data Subjects”) that the personal data referred to them (the “Data”) will be processed, in compliance with current legislation on the protection of personal data, for the performance of the obligations envisaged by EU and national regulations on Internal Dealing.

1. Data Controller

Juventus Football Club S.p.A. is the data controller, with registered office in Turin, Via Druento 175, (hereinafter “Company”).

2. Data Protection Officer

The data protection officer (“DPO”) appointed by the Company can be contacted by sending a communication by email to the address privacy@juventus.com.

3. Types of personal data

The Data processed by the Data Controller on the basis of the Internal Dealing Procedure concern personal data (name, surname, date and place of birth, tax code and relational relationship with the Internal Dealing Person) and information relating to financial instruments and key transactions.

In any case, the Data processed is only and exclusively that strictly necessary for the pursuit of the purposes described below.

Personal data collected is provided directly by the Key Person, for themselves and for others, as in the case of persons associated with the Key Person.

4. Purpose of data processing, nature of data provision and legal basis

The Company processes data for the following purposes:

- (a) for the maintenance of the List of Internal Dealing Persons in order to perform the obligations deriving from current regulations;
- (b) for the performance of the communications required by law in relation to the possible completion by the Internal Dealing Persons of key transactions pursuant to EU and national regulations. This is in order to ensure maximum disclosure transparency towards the market;
- (c) exercise and defend the Company’s rights in every venue, including judicial, administrative, arbitration, conciliation and out-of-court procedures

The Data are necessary to fulfil a legal obligation to which the Company is bound. Any refusal to provide the Data will make it impossible for the Company to comply with legal provisions.

The Data referred to in letters **a)** and **b)** are necessary to fulfil a legal obligation to which the Company is bound, which represents the lawful basis of the processing (Article 6(1)(c) of the Regulation). The Data referred to in letter **c)** are necessary for the Company to exercise its right of defence and is therefore based on the legitimate interest of the Data Controller (Article 6(1)(f) of the Regulation)

5. Processing methods

The Data will be processed by means of archiving in electronic format, in compliance with the regulations on the processing of personal data, adopting the appropriate security measures.

Data processing is managed by internal Juventus personnel (employees, system administrators) who are specifically authorised, trained and instructed to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorised persons.

6. Disclosure and dissemination of Data

Within the Company, only the persons appointed by the Company and authorised to carry out the processing operations as part of the aforementioned procedure may become privy to the Data. Third parties required to process the information for the same purposes referred to in point 4 may also have access to the Data, and are appointed as Data Processors to this end. The complete list of the persons appointed as Data Processors



is available from the Data Controller.

The Data may also be communicated to the supervisory bodies (Consob), or any other competent authority, at their request. These entities will process the data as independent data controller within the limits strictly relevant to the obligations, the tasks and purposes set out above.

The Data shall not be disclosed.

7. Data Retention Period

The Data will be retained in a form that allows the identification of the Data Subject for a period of time not exceeding that necessary to achieve the purposes for which they were acquired and for a maximum of five years, or upon the lapse of the circumstances that led to the registration and/or modification of their Data. After this deadline, the Data will be deleted or blacked out (in both cases the operation is irreversible and the data may in no way be restored), unless its further retention is necessary to fulfil orders issued by Public Authorities and/or Supervisory Bodies.

8. Rights of the Data Subject

We inform you that you may exercise at any time the rights that are recognised by the applicable regulations, including: a) to access your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes; b) to have inaccurate personal data concerning you corrected without delay; c) to have your data, in the cases provided, deleted; d) to have the processing of your data restricted or to object to it, whenever possible; e) to request the portability of the data that you have provided to the Data Controller, i.e. to receive them in a commonly used and machine-readable structured format, also to forward such data to another controller, without any impediment by the Data Controller. You may also lodge a complaint with the Authority for the Protection of Personal Data pursuant to Article 77 of the Regulation. To exercise these rights, simply contact the Data Controller by writing to the email address: privacy@juventus.com.

9. Transfer of Data Abroad

The Data is not transferred to non-EU countries; it is, in fact, stored at the Company's registered office. The Data are stored at Juventus headquarters and on servers located in the European Union. However, for the provision of some services by the Data Processors, the Data may be transferred abroad. In that case, Juventus undertakes that the transfer shall take place in compliance with the appropriate and suitable guarantees for the purpose of the transfer itself pursuant to the applicable legislation and in particular Articles 45 and 46 of the Regulation. More information on the transfer of the Data and the guarantees provided for their protection, can be requested from the Company by writing to the email address: privacy@juventus.com.



ANNEX B

TEMPLATE FOR COMMUNICATION TO PERSONS ASSOCIATED WITH THE KEY PERSONS

_____, _____

RE: Communication in accordance with existing regulations and the *"Internal Dealing Procedure of Juventus Football Club S.p.A."*. Insertion into the list of Internal Dealing Persons

Dear _____,

In compliance with applicable regulations, as well as the procedure on internal dealing (the **"Internal Dealing Procedure"**) adopted by Juventus Football Club S.p.A. (the **"Company"**) of which I am (*director/auditor/executive manager with strategic responsibilities*) I inform you that I will indicate you as a person associated with me. As a result, you will be inserted into the list of Internal Dealing Persons of the Company (the **"List"**).

For the obligations consequent to that insertion and for the respective operational aspects, I refer to the contents of the Internal Dealing Procedure (attached hereto) and the regulations cited therein. I also remind you that any abuse of inside information and market manipulation constitute offences subject to criminal and administrative sanctions in accordance with the regulations in force.

I therefore invite you to read the contents of the Internal Dealing Procedure and to sign this document for acknowledgement and acceptance.

Kind regards,

* * *

For acknowledgement and acceptance of the content of this communication.

Date, _____, _____

Signature



PRIVACY POLICY pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Pursuant to and for the purposes of Articles 13 and 14 of European Regulation No. 2016/679 (hereinafter “Regulations”), Juventus FC SpA, as Data Controller, wishes to inform the Internal Dealing Persons (the “Data Subjects”) that the personal data referred to them (the “Data”) will be processed, in compliance with current legislation on the protection of personal data, for the performance of the obligations envisaged by EU and national regulations on Internal Dealing.

1. Data Controller

Juventus Football Club S.p.A. is the data controller, with registered office in Turin, Via Druento 175, (hereinafter “Company”).

2. Data Protection Officer

The data protection officer (“DPO”) appointed by the Company can be contacted by sending a communication by email to the address privacy@juventus.com.

3. Types of Personal Data

The Data processed by the Data Controller on the basis of the Internal Dealing Procedure concern personal data (name, surname, date and place of birth, tax code and relational relationship with the Subject *Internal Dealing*) and information relating to financial instruments and key transactions.

In any case, the Data processed is only and exclusively that strictly necessary for the pursuit of the purposes described below.

Personal data collected is provided directly by the Key Person, for themselves and for others, as in the case of persons associated with the Key Person.

4. Purpose of Data Processing, Nature of Data Provision and Legal Basis

The Company processes data for the following purposes:

- (a) for the maintenance of the List of *Internal Dealing* Persons in order to perform the obligations deriving from current regulations;
- (b) for the performance of the communications required by law in relation to the possible completion by the Internal Dealing Persons of key transactions pursuant to EU and national regulations. This is in order to ensure maximum disclosure transparency towards the market;
- (c) exercise and defend the Company’s rights in every venue, including judicial, administrative, arbitration, conciliation and out-of-court procedures

The Data are necessary to fulfil a legal obligation to which the Company is bound. Any refusal to provide the Data will make it impossible for the Company to comply with legal provisions.

The Data referred to in letters **a)** and **b)** are necessary to fulfil a legal obligation to which the Company is bound, which represents the lawful basis of the processing (Article 6(1)(c) of the Regulation). The Data referred to in letter **c)** are necessary for the Company to exercise its right of defence and is therefore based on the legitimate interest of the Data Controller (Article 6(1)(f) of the Regulation)

5. Processing Methods

The Data will be processed by means of archiving in electronic format, in compliance with the regulations on the processing of personal data, adopting the appropriate security measures.

Data processing is managed by internal Juventus personnel (employees, system administrators) who are specifically authorised, trained and instructed to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorised persons.

6. Disclosure and Dissemination of Data

Within the Company, only the persons appointed by the Company and authorised to carry out the processing operations as part of the aforementioned procedure may become privy to the Data. Third parties required to



process the information for the same purposes referred to in point 4 may also have access to the Data, and are appointed as Data Processors to this end. The complete list of the persons appointed as Data Processors is available from the Data Controller.

The Data may also be communicated to the supervisory bodies (Consob), or any other competent authority, at their request. These entities will process the data as independent data controller within the limits strictly relevant to the obligations, the tasks and purposes set out above.

The Data shall not be disclosed.

7. Data Retention Period

The Data will be retained in a form that allows the identification of the Data Subject for a period of time not exceeding that necessary to achieve the purposes for which they were acquired and for a maximum of five years, or upon the lapse of the circumstances that led to the registration and/or modification of their Data. After this deadline, the Data will be deleted or blacked out (in both cases the operation is irreversible and the data may in no way be restored), unless its further retention is necessary to fulfil orders issued by Public Authorities and/or Supervisory Bodies.

8. Rights of the Data Subject

We inform you that you may exercise at any time the rights that are recognised by the applicable regulations, including: a) to access your personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes; b) to have inaccurate personal data concerning you corrected without delay; c) to have your data, in the cases provided, deleted; d) to have the processing of your data restricted or to object to it, whenever possible; e) to request the portability of the data that you have provided to the Data Controller, i.e. to receive them in a commonly used and machine-readable structured format, also to forward such data to another controller, without any impediment by the Data Controller. You may also lodge a complaint with the Authority for the Protection of Personal Data pursuant to Article 77 of the Regulation. To exercise these rights, simply contact the Data Controller by writing to the email address: privacy@juventus.com.

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ANNEX C

FORM FOR NOTIFICATION AND DISCLOSURE TO THE PUBLIC OF TRANSACTIONS CARRIED OUT BY PERSONS WHO EXERCISE ADMINISTRATIVE, CONTROL OR MANAGEMENT FUNCTIONS AND BY PERSONS CLOSELY ASSOCIATED WITH THEM

1	Data relating to the person who exercises administrative, control or management functions/ to a closely associated person	
a)	Name	<i>For natural persons: name and surname.</i> <i>For legal persons: full company name, including legal form as stated by the register in which it is listed, if applicable.</i>
2	Reason for the notification	
a)	Position/qualification	<i>For persons exercising administrative, supervisory or managerial functions: indicate the position (e.g. chief executive officer, chief financial officer) held within the issuer, emission allowance market participant, auction platform, auction commissioner, auction monitor.</i> <i>For closely associated persons,</i> – <i>indicate that the notification concerns a person closely associated with a person who exercises administration, control or management functions;</i> – <i>name and surname and role of the key person who exercises administration, control or management functions.</i>
b)	Initial notification/modification	<i>Indicate if it is an initial notification or a modification of a previous notification. In the case of a modification, explain the error that is being corrected with this modification.</i>
3	Data relating to the issuer, to the participant in the emission allowance market, the auction platform, the auctioneer or the auction monitor	
a)	Name	<i>Full name of entity.</i>
b)	LEI	<i>Identification code of legal entity, compliant with the LEI code indicated in ISO 17442 standard.</i>
4	Data relating to the transaction: section to be repeated for i) each type of instrument; ii) each type of transaction; iii) each date; and iv) each venue in which the transactions were carried out	
a)	Description of the financial instrument, type of instrument Identification code	– <i>Indicate the nature of the instrument:</i> – <i>a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument;</i> – <i>an emission allowance, a product subject to auction based upon emission allowances or a derivative on emission allowances.</i> <i>- Identification code of the instrument as defined by the delegated regulation of the Commission which supplements Regulation (EU) No. 600/2014 of the European Parliament and of the Council as regards the technical rules of regulation on reporting transactions to the competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014.</i>



b)	Nature of the transaction	Description of the type of transaction using, if necessary, the types of transaction established by Article 10 of Delegated Regulation (EU) 2016/522 of the Commission adopted in accordance with Article 19, paragraph 14, of Regulation (EU) No. 596/2014 or one of the specific examples indicated in Article 19, paragraph 7 of Regulation (EU) No. 596/2014. In accordance with Article 19(6)(e) of Regulation (EU) No. 596/2014, indicate if the transaction is linked to the utilization of share option programmes	
c)	Price(s) and volume(s)	Prices(s)	Volume(s)
		If several transactions of the same nature (purchase, sale, assumption and granting on loan, etc.) on the same financial instrument or on the same emission allowance are carried out on the same day and in the same venue, indicate in this field the prices and volumes of those transactions, in two columns as illustrated above, inserting all lines necessary. Use the data standards for the price and quantity, including, if necessary, the price currency and the quantity currency, as defined by the Commission Delegated Regulation which supplements Regulation (EU) No. 600/2014 of the European Parliament and of the Council as regards the technical rules of regulatory technical standards on the reporting of transactions to the competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014.	
d)	Aggregate information – Aggregate volume – Price	The volumes of multiple transactions are aggregated when those transactions: – refer to the same financial instrument or to the same emission allowance; – are of the same nature; – are carried out on the same day; and – are carried out in the same venue. Use the data standards for the quantity, including, if necessary, the quantity currency, as defined by the Commission Delegated Regulation which supplements Regulation (EU) No. 600/2014 of the European Parliament and of the Council as regards the technical rules of regulatory technical standards on the reporting of transactions to the competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014. Information on prices: – in the case of a single transaction, the price of the single transaction; – in the case where the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions. Use the data standards for the price, including, if necessary, the price currency, as defined by the Commission Delegated Regulation which supplements Regulation (EU) No. 600/2014 of the European Parliament and of the Council as regards the technical rules of regulatory technical standards on the reporting of transactions to the competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014.	
e)	Date of the transaction	Date of the day of performance of the notified transaction. Use the ISO 8601 format: YYYY-MM-DD; UTC time.	



f)	Venue of the transaction	<i>Name and identification code of the trading venue in accordance with MiFID, of the systematic internaliser and of the organised trading platform outside the European Union in which the transaction was carried out as defined by the Delegated Regulation of the Commission supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014, or if the transaction has not been performed in one of the venues indicated above, indicate «outside a trading venue».</i>
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