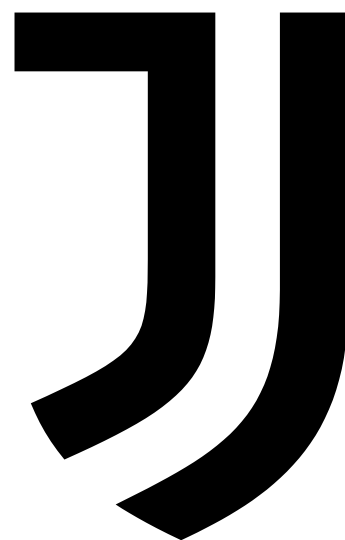


# PROCEDURE

INTERNAL DEALING OF JUVENTUS FOOTBALL CLUB  
S.P.A.

**JUVENTUS**



## 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 conformity with the contents of the regulatory provisions set out in Article 19 of Regulation (EU) no. 596/2014 ("**Regulation 596/2014**" or the "**MAR**") and the respective European implementing provisions, as well as in Article 114, paragraph 7 of Italian Legislative Decree no. 58 of 24 February 1998, as amended and supplemented ("**Consolidated Finance Law**") and the regulation adopted by CONSOB with resolution no. 11971 of 1999, as amended and supplemented (the "**Issuers' Regulation**").
- 1.2 The Procedure is aimed at (i) identifying the Internal Dealing Parties (as defined *below*), required to make the communications foreseen by the applicable regulations on *internal dealing*, (ii) informing the Internal Dealing Parties 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 the above communications to the market.
- 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 MAR Key Persons and the IR Key Shareholders (as defined *below*) must comply with the Procedure and guarantee its knowledge and compliance by, respectively, the respective Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders (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 to replace 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 (respectively, the "**Borsa Regulation**" and the "**Instructions**") and by the applicable provisions of law and regulations.
- 1.6 This version of the Procedure was approved by the Company's Board of Directors on 1 March 2023.

## 2. DEFINITIONS

In addition to the definitions contained in other articles, 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 at the time.

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

**“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, as appropriate, of MAR Financial Instruments or the IR 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, as appropriate, of MAR Financial Instruments or IR Financial Instruments, following the execution of capital operations, has been executed.

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

**“Corporate Affairs Department”** refers to the *corporate affairs* department of the Company.

**“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”** means information of a specific nature that has not been made public and that directly or indirectly concerns the Company or the MAR Financial Instruments of the same that, if made public, could have a significant bearing on the prices of the MAR Financial Instruments.

In particular, by information of a *“specific nature”* we are here 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 MAR Financial Instruments or the respective derivative financial instruments. In that regard, in the case of a protracted process aimed at the materialisation of a particular circumstance or a particular event or in the case of a protracted process that determines them, that future circumstance or future event, as well as the intermediate step of that process, related to the materialisation or determination of the circumstance or future event, may be considered to be information of precise nature.

In addition, *“information that, if made public, could significantly influence the prices of the MAR 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:

- c) the status of contractual negotiations;
- d) contractual conditions agreed upon on a provisional basis;
- e) the possibility of placing financial instruments;
- f) the conditions under which such instruments are sold;
- g) the provisional conditions for the placement of financial instruments;
- h) the possibility of a financial instrument being included in an index; and
- i) 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**” refer to:

- a) the persons indicated in Article 3, paragraph 1, no. 25) of the MAR (the “**MAR Key Persons**”), in other words:
  - (i) the members of the Company's Board of Directors;
  - (ii) the members of the Company's Board of Statutory Auditors;
  - (iii) the senior Company 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 MAR Key Persons (hereafter, the “**Persons Associated with the MAR Key Persons**” and jointly with the MAR Key Persons, the “**MAR Key Entities**”), or:
  - (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;
- c) the “key entities” in accordance with Article 152-sexies, paragraph 1, letter c) of the Issuers' Regulation, or anyone holding an investment, calculated in accordance with Article 118 of the Issuers' Regulation,

equal to at least 10 per cent of the share capital of the Company, represented by shares with voting right, as well as any other entity who controls the Company (the “*IR Key Shareholders*”);

- d) the persons closely associated with the IR Key Shareholders (hereafter, the “**Persons Associated with the IR Key Shareholders**” and jointly with the IR Key Shareholders, the “**IR Key Entities**”), namely:
- (i) the non-legally separated spouse, the dependent children, even of the spouse and, if cohabiting for at least one year, the parents, relatives and in-laws;
  - (ii) the legal persons, partnerships and trusts in which an IR Key Shareholder or one of the persons indicated in this letter d) point (i) is the holder, alone or jointly with others, of the management role;
  - (iii) the legal persons, controlled directly or indirectly by an IR Key Shareholder or by one of the persons indicated in this letter d) point (i);
  - (iv) the partnerships whose economic interests are substantially equivalent to those of an IR Key Shareholder or one of the persons indicated in this letter d) point (i);
  - (v) the trusts established to the benefit of an IR Key Shareholder or one of the persons indicated in this letter d) point (i).

#### **4. IDENTIFICATION OF INTERNAL DEALING PERSONS**

- 4.1 The Person in Charge indicated in the following Article 5 of this Procedure identifies the MAR Key Persons and the IR Key Shareholders and, based upon the information communicated by the same, identifies the Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders.
- 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 MAR Key Persons and the IR Key Shareholders 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 that, even if that does not occur, the MAR Key Person and/or the IR Key Shareholder will be understood to be aware of the above.
- 4.4 The MAR Key Persons and the IR Key Shareholders must inform, respectively, the Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders 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 MAR Key Persons and the IR Key Shareholders inform, respectively, the Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders 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 MAR Key Persons and the IR Key Shareholders communicate promptly to the Person in Charge any change or update of the personal details, respectively, of the Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders.

- 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 reporting 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 the same.

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

- 5.1 The Person in Charge of receiving, managing, communicating and disseminating to the market the information referred to in this document, as well as updating the Internal Dealing Persons is the Corporate Affairs Department (the **"Person in Charge"**). 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 MAR Key Transactions and - where the Issuer has received the assignment from the IR Key Shareholder - on the IR Key Transactions within the terms established by this Procedure;
  - (g) informs the MAR Key Persons and the IR Key Shareholders 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 any change to the identity of the Internal Dealing Persons.
- 5.4 The Board of Directors has the right to identify, for limited periods of time, other MAR 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 MAR 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. REPORTING OBLIGATIONS OF MAR KEY PERSONS**

- 6.1 The MAR Key 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 **"MAR 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, paragraph 2, letter b) of Regulation 596/2014,

(jointly, the “**MAR Financial Instruments**”).

6.2 The obligations referred to in Paragraph 6.1 apply if the total amount of the MAR Significant Transactions reaches the threshold of Euro 20,000 in a calendar year. More specifically, MAR Key Transactions are all subsequent transactions that involve MAR financial instruments and have been set up by MAR key persons that take place once a sum of Euro 20,000 (or any other amount identified by the competent authority pursuant to article 19, paragraph 2, of the MAR) has been reached.

6.3 The MAR Key Transactions include, by way of example:

- (a) acquisition, transfer, short sale, subscription or exchange;
- (b) acceptance or exercise of a right of option, including a right of option granted to an MAR Key Person or to employees as part of the remuneration due to them, and the transfer 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 MAR Financial Instrument;
- (f) acquisition, sale 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 transfer of credit of the Company, including *credit default swaps*;
- (i) conditional transactions subject to the occurrence of conditions and the effective execution 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 MAR 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 a MAR Key Entity;
- (p) the receipt or granting of a Mar financial instrument as a loan.

The MAR Key Transactions also include:

- (a) the constitution on pledge or loan of financial instruments by or on behalf of a MAR Key Entity. To that end, it is not necessary to notify of a constitution on pledge of financial instruments, or another similar guarantee, in connection with the deposit of financial instruments in a custody account, unless and until that constitution on 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 a MAR Key Entity, 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 MAR Key Entity 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 MAR Key Entity; (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 MAR Financial Instrument subject to the transactions carried out, singularly, by each MAR Key Entity within a calendar year, notwithstanding that once the aforementioned limit of Euro 20,000 or the different amount identified by the competent authority in accordance with Article 19, paragraph 2 of the MAR has been exceeded, the MAR Key Person must report on the transactions already carried out and each transaction performed subsequent to reaching the ceiling indicated;
- (b) the value of the transactions related to derivative financial instruments indicated by Article 1, paragraph 3 of the Consolidated Finance Law 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 MAR Key Person or, as appropriate, of each Person Associated with the MAR Key Persons.

6.5 The MAR Key Entities communicate the MAR Key Transactions (the "**MAR Communications**") to the Company - only by *email* addressed to the Person in Charge at the address [internaldealing@juventus.com](mailto:internaldealing@juventus.com) - by and not beyond 3 (three) Working Days from the Date of Performance of the MAR Key Transaction. The MAR Communications must be drafted according to the template indicated in Annex C. The Company may allow the MAR Key Persons to send the MAR Communications also on behalf of the Persons Associated with the MAR Key Persons.

6.6 The MAR Key Entities submit the MAR Communications to CONSOB, by the third Working Day after the



Date of Performance of the MAR Key Transaction, by way of the certified email service at the address [consob@pec.consob.it](mailto:consob@pec.consob.it) (if the sender is subject to the obligation to have certified email) or by email to the address [protocollo@consob.it](mailto:protocollo@consob.it), specifying as the recipient "Markets Information 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, 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 communication obligations of the MAR 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 stock 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 stock or share of a collective investment body or it provides exposure to a portfolio of assets and the MAR Key Entity 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 MAR Key Entity makes all reasonable efforts to use that information.

## **7. LIMITATIONS ON THE COMPLETION OF TRANSACTIONS CARRIED OUT BY MAR KEY PERSONS ("BLACK-OUT PERIODS")**

- 7.1 It is prohibited for the MAR Key Persons to carry out, directly or by intermediaries, on their own behalf or on behalf of third parties, MAR 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 prohibition not to apply - also based upon the trading characteristics identified by Article 9 of Delegated Regulation (EU) 2016/522 - to acts of exercise of any *stock options* or rights of option relating to MAR Financial Instruments and, limited to Shares deriving from *stock option* plans, to the consequent disposal operations provided that they are carried out at the same time as the act of exercise.
- 7.3 The limitations also do not apply in the case of exceptional situations of subjective need, such as serious financial difficulties that require the immediate sale of Shares, adequately motivated by way of the

written request of the interested party to the Company.

- 7.4 The Board of Directors of the Company reserves the right to introduce further limitations, to all or some of the MAR Key Persons and for the period of time deemed necessary, with reference to the completion of all or some of the MAR Key Transactions. In this case, the Person in Charge will be responsible for communicating to the MAR Key Persons the start and end date of the period in which it is prohibited for the MAR Key Persons to complete the aforementioned MAR Key Transactions.

## 8. REPORTING OBLIGATIONS OF IR KEY ENTITIES

- 8.1 The IR Key Shareholders communicate to CONSOB and the public according to the methods and terms specified, respectively, in Paragraphs 8.2 and 8.3, all transactions (the "**IR Key Transactions**") of purchase, sale, subscription or exchange, directly or through an intermediary, by IR Key Entities and Persons Associated with the IR Key Shareholders, with reference to:

- (a) shares issued by the Company;
- (b) financial instruments related to shares, which include:
  - financial instruments that permit the subscription, purchase or sale of Shares;
  - debt financial instruments convertible into Shares or exchangeable with the same;
  - derivative financial instruments on Shares, indicated by Article 1, paragraph 2-ter, letter a) of the Consolidated Finance Law;
  - other financial instruments, equivalent to shares, represented by those shares,

(jointly, the "**IR Financial Instruments**").

- 8.2 The IR Key Shareholders communicate the IR Key Transactions ("**IR Communications**") to CONSOB by the end of the fifteenth day of the month after that in which the IR Key Transaction was carried out (according to the provisions of the definition of Date of Performance indicated in Article 2 of this Procedure), by sending the template indicated in Annex D, complete with all information indicated therein, being responsible for those communications. This form, once filled in, must be transmitted to Consob by fax to the number 06.84.77.757 or to the certified email address consob@pec.consob.it (if the sender is subject to the obligation to have a certified email) or by email to the address protocollo@consob.it or by the other methods established by CONSOB
- 8.3 The IR Key Shareholders inform the public of the IR Key Transactions carried out by themselves and by the Persons closely associated with them by the end of the fifteenth day of the month following that in which the transaction was carried out, by sending the form included in Annex D to two press agencies, or using an SDIR
- 8.4 The communication to Consob and / or to the public may be made by the Company on behalf of the IR Key Shareholders, subject to agreement with the Issuer.
- 8.5 If the IR Key Shareholders has entrusted the Company to make the IR communications due to Consob and/or the public on its behalf pursuant to the previous paragraph 8.4, the Key Shareholder communicates the IR Key Transactions that they have performed or that have been performed by Persons connected to the IR Key Shareholder to the Company by the end of the fifteenth day of the month after that in which the transaction was carried out, by sending the form indicated in Annex D duly

filled in to the Person in Charge, by email to the following address: [internaldealing@juventus.com](mailto:internaldealing@juventus.com). The Company shall make the IR Communications by the end of the trading day following that on which it received the information from the aforementioned IR Key Shareholder:

- to Consob, by means of the procedure used by the Issuer pursuant to Article 65-septies of the Issuers' Regulation for the storage and filing of information by sending the form referred to in Annex D;
- to the public, according to the procedures foreseen for in Part III, Title II, Chapter I of the Issuers' Regulation by sending the form referred to in Annex D.

- 8.6 The IR Key Shareholders are responsible for the exact and prompt communication of the information due to the Company, to CONSOB and to the public, and they will therefore be liable towards the Company for any damage, even of a reputational nature, suffered by the same as a result of any breaches of their obligations.
- 8.7 This is without prejudice to all further obligations of law and regulations in any case applicable, each time, to the IR Key Entities.
- 8.8 The communication obligations envisaged by this Procedure do not exist for the following IR Key Transactions:
- (a) IR Key Transactions whose total amount does not reach the market value of Euro 20,000 by the end of the year; after each communication, the IR Key Transactions whose amount does not reach a market value of a further Euro 20,000 by the end of the year do not have to be communicated; for the related derivative financial instruments, the amount is calculated with reference to the underlying shares;
  - (b) IR Key Transactions between an IR Key Shareholder and the respective Persons Associated with the IR Key Shareholder;
  - (c) IR Key Transactions carried out by the Company and its subsidiaries;
  - (d) IR Key Transactions carried out by a credit institution or by an investment company that contribute to the creation of the trading portfolio of that institution or company, as defined by Article 4, paragraph 1, point 86 of Regulation (EU) no. 575/2013, provided that said entity comply with the requirements foreseen by the Issuer Regulation.
- 8.9 The obligations foreseen by this Article 8 do not apply if the IR Key Entities are also MAR Key Entities and are already required to notify the transactions carried out pursuant to Article 6 above.

## **9. PERSONAL DATA PROCESSING**

- 9.1 For the purposes of the Procedure, the Company may be required to process specific personal data of the Internal Dealing Persons. The Internal Dealing Persons are, therefore, informed, in accordance with and within the terms of Regulation (EU) 2016/679 (“**GDPR**”) and Italian Legislative Decree no. 196/2003 as amended by Italian Legislative Decree 101/2018 (“**Applicable Privacy Regulations**”), that the personal data related to the conservation of the List and the execution of key transactions will be processed by the Company in compliance with the Applicable Privacy Regulations. The aforementioned processing will be carried out in order to fulfil the obligations prescribed by law. The data, where the legal requirements enforced by the regulations in force from time to time are met, may have to be communicated to any competent authority as foreseen by this Procedure and in particular to Consob and to the market. For more information on the methods of processing, the subjects to whom the data may be communicated and to exercise the rights recognized by the Applicable Privacy Law, the full privacy policy attached to the communications referred to in Annex A and Annex B with which the Company informs the Internal Dealing Parties of their inclusion in the List may be consulted. Upon delivery to the Person in Charge of the acceptance letter, as appropriate, in accordance with Annex A or Annex B the recipient shall be considered as appropriately informed in accordance with and for the purposes of the GDPR.

## **10. MODIFICATION AND PUBLICATION OF THE PROCEDURE**

- 10.1 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.
- 10.2 The amendments and/or additions to the provisions will be communicated to the MAR Key Persons and to the IR Key Shareholders with an indication of the date of entry into force of the new or amended provisions. The MAR Key Persons and the IR Key Shareholders will be responsible for communicating the amendments and/or additions, respectively, to the respective Persons Associated with the MAR Key Persons and the Persons Associated with the IR Key Shareholders.
- 10.3 This Procedure is published on the Company’s website.

## **11. VIOLATIONS AND LIABILITIES**

- 11.1 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 measure by which the fine is applied).
- 11.2 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 Consolidated Finance Law and Article 25-*sexies* of Italian Legislative Decree 231/2001.
- 11.3 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 liability whatsoever arising from or in any event connected to such Violations, as well as to receive compensation for any and all greater damages.

11.4 The Company’s Board of Directors is the body responsible for taking the appropriate measures in the case of any infractions of the Procedure.

11.5 If the party that has committed an infraction 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 infraction is classified as a disciplinary offence. In that case, the methods of disputing the infractions of the Procedure and the application of the consequent sanctions will occur in full respect of the provisions indicated in Article 7 of Italian Law no. 300 dated 20 May 1970 and in compliance with what is established by agreements and employment contracts, where applicable.

11.6 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.

## **12. IMPLEMENTATION OF THE PROCEDURE**

12.1 This Procedure, in the version approved by the Board of Directors on 1 March 2023, shall come into force on 2 March 2023.

**ANNEX A**

**TEMPLATE FOR COMMUNICATION TO MAR KEY PERSONS AND IR KEY SHAREHOLDERS**

\_\_\_\_\_ , \_\_\_\_\_

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 conformity with the procedure on *internal dealing* (the "**Internal Dealing Procedure**") adopted by Juventus Football Club S.p.A. (the "**Company**" or "**Juventus**") in conformity with the contents of the regulatory provisions set out in Article 19 of Regulation (EU) no. 596/2014 and the respective European implementing provisions, as well as in Article 114, paragraph 7 of Italian Legislative Decree no. 58 of 24 February 1998, as amended and supplemented, and the regulation adopted by CONSOB with resolution no. 11971 of 1999, as amended and supplemented, 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 legislation in force at the time.

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](mailto:internaldealing@juventus.com).

\* \* \*

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 \_\_\_\_\_, in the capacity of:

- MAR Key Person in accordance with the Internal Dealing Procedure
- IR Key Shareholder in accordance with the Internal Dealing Procedure

(as appropriate)

- Legal representative of \_\_\_\_\_, with registered office in \_\_\_\_\_, tax code and registration number at the Companies Register of \_\_\_\_\_, which has the capacity of IR Key Shareholder in accordance with the Internal Dealing Procedure,

#### 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 the same to the persons classified as Persons Associated with it 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 that I have fulfilled the aforementioned obligations.

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

LIST OF PERSONS ASSOCIATED WITH THE MAR KEY PERSON		
SPOUSE OR PARTNER EQUATED TO THEIR 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 MAR KEY PERSON OR BY ONE OF THE ASSOCIATED PERSONS LISTED ABOVE**

Company name	Registered office	Tax Code and VAT no.	Role covered (and indication of the Person Associated with the MAR Key Person)

**LEGAL PERSONS, PARTNERSHIPS OR TRUSTS CONTROLLED DIRECTLY OR INDIRECTLY BY THE MAR KEY PERSON OR BY ONE OF THE ASSOCIATED PERSONS LISTED ABOVE**

Company name	Registered office	Tax Code and VAT no.	Share of investment (and indication of the Person Associated with the MAR Key Person)





**LIST OF PERSONS ASSOCIATED WITH THE IR KEY SHAREHOLDERS**

**SPOUSE NOT LEGALLY SEPARATED OR PARTNER EQUATED TO SPOUSE PURSUANT TO ITALIAN LAW**

Surname and name	Date and place of birth	Tax code

**DEPENDENT CHILDREN, ALSO OF THE SPOUSE, UNDER ITALIAN LAW**

Surname and name	Date and place of birth	Tax code

**IF COHABITING FOR AT LEAST ONE YEAR, PARENTS, RELATIVES AND IN-LAWS**

Surname and name	Date and place of birth	Tax code

**LEGAL PERSONS, PARTNERSHIPS AND TRUSTS IN WHICH THE IR KEY SHAREHOLDER OR ONE OF THE ASSOCIATED PERSONS LISTED ABOVE IS THE HOLDER, ALONE OR JOINTLY WITH OTHERS, OF THE MANAGEMENT ROLE**

Company name	Registered office	Tax Code and VAT no.	Role covered (and indication of the Person Associated with the IR Key Shareholder)


**LEGAL PERSONS, PARTNERSHIPS OR TRUSTS CONTROLLED DIRECTLY OR INDIRECTLY BY THE IR KEY SHAREHOLDER OR BY ONE OF THE ASSOCIATED PERSONS LISTED ABOVE**

Company name	Registered office	Tax Code and VAT no.	Share of investment (and indication of the Person Associated with the IR Key Shareholder)

**PARTNERSHIPS WHOSE ECONOMIC INTERESTS ARE SUBSTANTIALLY EQUIVALENT TO THOSE OF THE IR KEY SHAREHOLDER OR ONE OF THE ASSOCIATED PERSON LISTED ABOVE**

Company name	Registered office	Tax Code and VAT no.	Person Associated with the IR Key Shareholder

**TRUSTS ESTABLISHED TO THE BENEFIT OF THE IR KEY SHAREHOLDER OR ONE OF THE ASSOCIATED PERSONS LISTED ABOVE**

Company name	Registered office	Tax Code and VAT no.	Person Associated with the IR Key Shareholder

For acknowledgement and acceptance of the content of this communication.

Date, \_\_\_\_\_, \_\_\_\_\_

Signature

\_\_\_\_\_

## **PRIVACY POLICY pursuant to arts. 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 Parties (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 execution of the obligations envisaged by EU and national regulations on Internal Dealing.

### **1. Data Controller**

The Data Controller is Juventus Football Club S.p.A. company with registered offices in Via Druento 175 – 10151 Turin, (henceforth "Company").

### **2. Data Protection Officer**

The data protection officer (henceforth "DPO") appointed by the Company can be contacted by sending a communication by email to the address [privacy@juventus.com](mailto:privacy@juventus.com).

### **3. Type of personal data**

The Data processed by the Data Controller on the basis of the Internal Dealing Procedure concern personal data and information relating to financial instruments and key transactions.

In any case, the data processed are only and exclusively those strictly necessary for the pursuit of the purposes described below.

### **4. Purpose of the processing**

The Data will be processed (i) for the maintenance of the List of Internal Dealing Persons and (ii) for the execution of the communications required by law in relation to the possible completion by the Internal Dealing Persons of key transactions in accordance with EU and national regulations. This is in order to ensure maximum disclosure transparency vis-à-vis the market.

### **5. Nature of provision of Data**

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.

### **6. Legal basis of the processing**

The legal basis for the processing of the Data are the specific obligations of national and European law, in particular Regulation (EU) no. 596/2014 and related implementing provisions, Italian Legislative Decree no. 58/1998 ("Consolidated Finance Law") as amended and Consob Regulation no. 11971/1999 as amended and supplemented (Issuers' Regulation).

### **7. Processing methods**

The processing of personal data will take place through storage on paper and on electronic or automated media, in compliance with current legislation and specific company instructions, so as to guarantee their security and confidentiality.

### **8. Communication and dissemination of Data**

Within the Company, only the subjects appointed by the Data Controller and authorized to carry out the processing operations as part of the aforementioned activities 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 to this end they are appointed as Data Processors. 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 the request of the same, or in the event key transactions are performed. 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 will be disseminated through communication to the market within the limits set by the reference regulations.

#### **9. 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 processed for the time established by the current provisions on civil and tax matters. After this deadline, the Data will be deleted or transformed into anonymous form, unless their further retention is necessary to fulfil legal obligations or to fulfil orders issued by Public Authorities and / or Supervisory Bodies.

#### **10. Rights of the data subject**

The data subject has specific rights, including that of obtaining confirmation of whether or not their personal data exist, even if not yet recorded, the intelligible communication of this data, of their origin and the logic and purpose of said processing. The data subject can request the erasure, restriction to processing, transformation into anonymous form or blocking of the data processed in breach of the law, as well as the updating, correction or, if so interested, the integration of the data and the portability of the data to another Data Controller. All rights listed above may be exercised by sending a communication to the Company by email to the address [privacy@juventus.com](mailto:privacy@juventus.com) or by recorded delivery letter to the address of the Company: Via Druento 175 – 10151 Turin

#### **11. Complaint to the Authority**

If the data subject believes that the processing of your Data breaches the provisions contained in the Regulation, they have the right to lodge a complaint with the Data Protection Authority, in accordance with the provisions of Art. 77 of that Regulation.

#### **12. Transfer of Data abroad**

The Data are not transferred to non-EU countries, they are, in fact, stored at the Company's registered office.

ANNEX B

TEMPLATE FOR COMMUNICATION TO PERSONS ASSOCIATED WITH THE MAR KEY PERSONS AND  
PERSONS ASSOCIATED WITH THE IR KEY SHAREHOLDERS

\_\_\_\_\_ , \_\_\_\_\_

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 conformity 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 the (*director/auditor/manager with strategic responsibilities/key shareholder/...*) 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 legislation in force at the time.

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 arts. 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 Parties (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 execution of the obligations envisaged by EU and national regulations on Internal Dealing.

### **1. Data Controller**

The Data Controller is Juventus Football Club S.p.A. with registered office in Via Druento 175 – 10151 Turin.

### **2. Data Protection Officer**

The data protection officer (henceforth "DPO") appointed by the Company can be contacted by sending a communication by email to the address [privacy@juventus.com](mailto:privacy@juventus.com). (hereafter "DPO").

### **3. Types of personal data**

The Data processed by the Data Controller on the basis of the Internal Dealing Procedure concern personal data and information relating to financial instruments and key transactions.

In any case, the data processed are only and exclusively those strictly necessary for the pursuit of the purposes described below.

### **4. Purpose of processing**

The Data will be processed (i) for the maintenance of the List of Internal Dealing Subjects and (ii) for the execution of the communications required by law in relation to the possible completion by the Internal Dealing Subjects of key transactions pursuant to EU and national regulations. This is in order to ensure maximum disclosure transparency towards the market.

### **5. Nature of the data conferral**

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.

### **6. Legal basis of the processing**

The legal basis for the processing of the Data are the specific obligations of national and European law, in particular Regulation (EU) no. 596/2014 and related implementing provisions, Italian Legislative Decree no. 58/1998 ("Consolidated Finance Law") as amended and Consob Regulation no. 11971/1999 as amended and supplemented (Issuers' Regulation).

### **7. Processing methods**

The processing of personal data will take place through storage on paper and on electronic or automated media, in compliance with current legislation and specific company instructions, so as to guarantee their security and confidentiality.

### **8. Communication and dissemination of Data**

Within the Company, only the subjects appointed by the Data Controller and authorized to carry out the processing operations as part of the aforementioned activities 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 to this end they are appointed as Data Processors. 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 the request of the same, or in the event key transactions are performed. 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 will be disseminated through communication to the market within the limits set by the reference regulations.

#### **9. 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 processed for the time established by the current provisions on civil and tax matters. After this deadline, the Data will be deleted or transformed into anonymous form, unless their further retention is necessary to fulfil legal obligations or to fulfil orders issued by Public Authorities and / or Supervisory Bodies.

#### **10. Rights of the data subject**

The data subject has specific rights, including that of obtaining confirmation of whether or not their personal data exist, even if not yet recorded, the intelligible communication of this data, of their origin and of the logic and purpose of said processing. The data subject can request the erasure, restriction to processing, transformation into anonymous form or blocking of the data processed in breach of the law, as well as the updating, correction or, if so interested, the integration of the data and the portability of the data to another Data Controller. All rights listed above may be exercised by sending a communication to the Company by email to the address [privacy@juventus.com](mailto:privacy@juventus.com) or by recorded delivery letter to the address of the Company: Via Druento 175 – 10151 Turin

#### **11. Complaint to the Authority**

If the data subject believes that the processing of your Data breaches the provisions contained in the Regulation, they have the right to lodge a complaint with the Data Protection Supervisory Authority, in accordance with the provisions of Art. 77 of that Regulation.

#### **12. Transfer of Data abroad**

The Data are not transferred to non-EU countries, they are, in fact, stored at the Company's registered office.

## 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

<b>1</b>	<b>Data relating to the person who exercises administrative, control or management functions/ to a closely associated person</b>	
a)	Name	<p><i>For natural persons: name and surname.</i></p> <p><i>For legal persons: full company name, including legal status as stated by the register in which it is listed, if applicable.</i></p>
<b>2.</b>	<b>Reason for the notification</b>	
a)	Position/qualification	<p><i>For persons who exercise functions of administration, control or management: indicate the role (for example, managing director, finance director) occupied within the issuer, the emission allowance market participant, the auction platform, the auctioneer, the auction monitor.</i></p> <p><i>For persons closely associated,</i></p> <ul style="list-style-type: none"> <li>– <i>indicate that the notification concerns a person closely associated with a person who exercises administration, control or management functions;</i></li> <li>– <i>name and surname and role of the key person who exercises administration, control or management functions.</i></li> </ul>
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 corrected with this modification.</i>
<b>3.</b>	<b>Data relating to the issuer, to the participant in the emission allowance market, the auction platform, the auctioneer or the auction monitor</b>	
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>
<b>4</b>	<b>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</b>	

a)	Description of the financial instrument, type of instrument Identification code	<p>– Indicate the nature of the instrument:</p> <ul style="list-style-type: none"> <li>– a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument;</li> <li>– an emission allowance, a product subject to auction based upon emission allowances or a derivative on emission allowances.</li> </ul> <p>- 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.</p>					
b)	Nature of the transaction	<p>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.</p> <p>In accordance with Article 19, paragraph 6, letter e) of Regulation (EU) no. 596/2014, indicate if the transaction is linked to the use of share option programmes</p>					
c)	Price(s) and volume(s)	<table border="1" data-bbox="624 1144 1493 1256"> <thead> <tr> <th data-bbox="624 1144 1034 1200">Prices(s)</th> <th data-bbox="1034 1144 1493 1200">Volume(s)</th> </tr> </thead> <tbody> <tr> <td data-bbox="624 1200 1034 1256"></td> <td data-bbox="1034 1200 1493 1256"></td> </tr> </tbody> </table> <p>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.</p> <p>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.</p>		Prices(s)	Volume(s)		
Prices(s)	Volume(s)						

d)	Aggregate information – Aggregate volume – Price	<p><i>The volumes of multiple transactions are aggregated when those transactions:</i></p> <ul style="list-style-type: none"> <li>– refer to the same financial instrument or to the same emission allowance;</li> <li>– are of the same nature;</li> <li>– are carried out on the same day; and</li> <li>– are carried out in the same venue.</li> </ul> <p><i>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.</i></p> <p><i>Information on prices:</i></p> <ul style="list-style-type: none"> <li>– in the case of a single transaction, the price of the single transaction;</li> <li>– in the case where the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.</li> </ul> <p><i>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.</i></p>
e)	Date of the transaction	<p><i>Date of the day of execution of the notified transaction. Use the ISO 8601 format: YYYY-MM-DD; UTC time.</i></p>
f)	Venue of the transaction	<p><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></p>

**ANNEX D**

**TEMPLATE FOR NOTIFICATION AND COMMUNICATION OF IR KEY TRANSACTIONS**

<b>1.</b>	<b>Data relating to the entity that holds shares in an amount at least equal to 10 per cent or that controls the listed issuer or the person closely associated</b>	
a) <sup>(a)</sup>	Name	<p><i>For natural persons:</i></p> <p>Name:</p> <p>Surname:</p> <p><i>For legal persons:</i></p> <p>Company name:</p>
<b>2.</b>	<b>Reason for the notification</b>	
a)	Reason for the notification	<p><i>Entity that holds shares in an amount at least equal to 10 per cent of the listed issuer:</i> <input type="checkbox"/></p> <p><i>Entity that controls the listed issuer:</i> <input type="checkbox"/></p> <p>-----</p> <p><i>Person closely associated</i> <input type="checkbox"/></p> <p>Indicate that the notification concerns a person closely associated with:</p> <p><i>For natural persons:</i></p> <p>Name:</p> <p>Surname:</p> <p><i>For legal persons:</i></p> <p>Company name:</p>
b) <sup>(b)</sup>	Initial notification/modification	<p>Initial notification: <input type="checkbox"/></p> <p>Modification of previous notification <input type="checkbox"/></p> <p>Reason for the modification:</p>

<sup>(a)</sup> Data relating to the entity that carries out the transaction

*For natural persons: name and surname.*

*For legal persons: full company name, including legal status as stated by the register in which it is listed, if applicable.*

<sup>(b)</sup> 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 corrected with this notification.

<b>3.</b>	<b>Data relating to the issuer</b>					
a) <sup>(c)</sup>	Name					
b) <sup>(d)</sup>	LEI					
<b>4</b>	<b>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</b>					
a)	Description of the financial instrument, type of instrument  Identification code					
b) <sup>(e)</sup>	Nature of the transaction					
c) <sup>(f)</sup>	Price(s) and volume(s)	<table border="1"> <thead> <tr> <th>Prices(s)</th> <th>Volume/s</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Prices(s)	Volume/s		
Prices(s)	Volume/s					
d) <sup>(g)</sup>	Date of the transaction					
e)	Venue of the transaction	Name of the trading venue: Identification code «Outside a trading venue»: <input type="checkbox"/>				

<sup>(c)</sup> Full name of entity.

<sup>(d)</sup> Identification code of legal entity, compliant with the LEI code indicated in ISO 17442 standard.

<sup>(e)</sup> Purchase, sale, subscription and exchange

<sup>(f)</sup> If several transactions of the same nature are carried out on the same day and in the same venue, indicate in aggregate form the total volume and the weighted average price of those transactions.

<sup>(g)</sup> Date of the day of execution of the notified transaction. Use the ISO 8601 format: YYYY-MM-DD; UTC time.