CODE ON THE HANDLING OF

INSIDE INFORMATION

OF

AQUAFIL S.P.A.

1. INTRODUCTION

- 1.1 This Code on the Handling of Inside Information (thereinafter the "*Code*"), was approved by the Board of Directors of Space3 S.p.A. ("*Space3*") on September 12, 2017, entered into effect on December 4, 2017, the effective date of the merger by incorporation of Aquafil S.p.A. ("*Aquafil*") into Space3 (which concurrently changed its name to "Aquafil S.p.A.") and it was subsequently reviewed by the Board of Directors on January 30, 2018
- 1.2 More specifically, this Code on the Handling of Inside Information was adopted pursuant to regulations governing the handling of inside information, as specified in Article 2 below.
- 1.3 This Code is intended to cogently regulate: (a) the handling and processing of Inside Information (as defined below) pertaining to Aquafil and the Subsidiary Companies (as defined below), as well as (b) the procedures to be followed for the disclosure of Inside Information both within and outside the Company.

2. **REGULATORY FRAMEWORK OF REFERENCE**

This Code has been adopted in implementation of:

- (a) the provisions specified in Part IV, Title III, Section I, of Legislative Decree
 No. 58 of February 24, 1998, as further amended ("TUF");
- (b) the provisions on corporate disclosure, contained in the Regulation adopted by Consob with Resolution No. 11971 of May 14, 1999, as further amended and extended (the "*Rules for Issuers*");
- (c) the provisions of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of April 16, 2014 ("*Regulation 596/2014*"), Commission Implementing Regulation (EU) No. 347/2016 pertaining to insider lists within the meaning of Article 18 of Regulation No. 596/2014, as well as Commission Implementing Regulation (EU) No. 1055/2016 laying down implementing technical standards with regard to the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information;
- (d) the recommendations issued by the Consob in respect of corporate disclosure;
- (e) the provisions on corporate disclosure, contained in the Rules of the Markets organized and managed by Borsa Italiana S.p.A. and the related instructions to the Market Rules of Borsa Italiana S.p.A;
- (f) the provisions regarding the management of inside information, set forth in the Corporate Governance Code for Italian Listed Companies issued by Borsa Italiana S.p.A.

3. **DEFINITIONS**

In addition to the terms defined in other articles of this Code, the following terms shall have the meanings thereto ascribed in the definitions set forth below, it being further

understood that definitions of terms in the singular shall also apply to the same in the plural, and vice versa.

- 3.1 *Employees*: any and all employees of Aquafil and its Subsidiary Companies who, in the exercise of their employment or duties, have access, on an ongoing or occasional basis, to Inside Information pertaining to Aquafil and its Subsidiary Companies.
- 3.2 *Inside Information*: for the intents and purposes of this Code, Inside Information means information governed hereunder:
 - (a) information of a precise nature, that is to say:
 - Information which refers to a set of circumstances that currently exist or may reasonably be expected to exist, or to an event that has occurred or may reasonably be expected to occur;
 - (ii) Information which is specific enough to enable a conclusion to be drawn as to the possible effect of the set of circumstances or event referred to in point (i) above, on the prices of Financial Instruments (as defined below) or the related derivative instrument;
 - (b) Information which has not been made public;
 - (c) Information relating directly or indirectly to Aquafil or its Subsidiary Companies or the Financial Instruments of Aquafil; and
 - (d) Information which, if it were made public, would be likely to have a significant effect on the prices of the Financial Instruments of Aquafil or on the prices of the related derivative financial instruments, i.e., information a reasonable investor would be likely to use as a decision-making factor for investments.

In such regard, in the event of a protracted process that is intended to bring about or that results in a specific set of circumstances or a particular event, the aforesaid future set of circumstances or future event, as well as any and all intermediate stages of the said process linked to bringing about either the said future set of circumstances or event, may be deemed to qualify as information of a precise nature. An intermediate stage in a protracted process must be deemed Inside Information, provided that the requirements imposed under this paragraph 3.2, are met.

3.3 **Insiders**: any and all persons who serve the Company in a professional capacity, whether pursuant to employment contracts or otherwise, and who are afforded access to Inside Information for the purpose of discharging their assigned tasks and duties (such as, for instance, consultants, accountants, or credit rating agencies).

- 3.4 *Insider Register*: Register of Insiders.
- 3.5 *Disclosure Officer:* the person in charge of the implementation of the provisions of this Code, appointed by Aquafil's Board of Directors pursuant to this Code.
- 3.6 *Subsidiary Companies:* any and all corporate entities directly or indirectly controlled by Aquafil within the meaning of Article 93 of TUF.
- 3.7 *Financial Instruments*: the instruments described in Article 4, paragraph 1, point 15), of Directive No. 2014/65/EU.

4. SCOPE

- 4.1 The provisions of this Code shall be binding on:
 - (a) all the members of the administrative and internal control bodies, as well as the Employees of Aquafil and its Subsidiary Companies; and
 - (b) the Insiders (hereinafter collectively referred to as *Relevant Persons*).
- 4.2 The Disclosure Officer, or other staff-member of Aquafil or any of the Subsidiary Companies appointed by the Disclosure Officer for such purpose, shall deliver a copy of this Code to all Relevant Persons, together with the form attached hereto as <u>Annex</u> <u>1</u>:
 - (a) upon acceptance of their appointment, in the case of members of the administrative and internal control bodies of Aquafil and its Subsidiary Companies and the Disclosure Officer;
 - (b) upon their hiring, in the case of Employees; or
 - (c) at the time of their appointment, in the case of other Insiders.
- 4.3 Whenever the Code is subject to amendment and/or extension, the Disclosure Officer, or other staff-member of Aquafil or any of the Subsidiary Companies appointed by the Disclosure Officer for such purpose, shall forward a copy of the Code as amended and/or extended to each Relevant Person.
- 4.4 Upon receipt of the copy hereof, all Relevant Persons are bound to fill in, sign and return to the Disclosure Officer the form attached hereto as Annex 1 by way of their acknowledgment and acceptance of this Code, it being however understood that the provisions set forth herein shall be applicable to and binding on all Insiders, regardless of whether or not they duly fill in, sign and return the said form.

4.5 Availing of support from the Company's relevant corporate functions, the Disclosure Officer shall ensure that any and all the aforementioned forms duly filled-in, signed and returned as indicated above are properly archived and maintained in the Company's records.

5. OBLIGATIONS BINDING ON RELEVANT PERSONS

- 5.1 All Relevant Persons are duty-bound to treat with the utmost confidentiality any and all Inside Information of which they may become aware. All necessary precautions must be taken to ensure that Inside Information circulates within the Company without compromising the confidential nature of the same, until the said Inside Information is notified to the market in accordance with the procedures set forth in this Code and applicable legislation.
- 5.2 Without prejudice of the provisions of Articles 184 *et seqq*. TUF, and Articles 14 and 15 of Regulation No. 596/2014, Relevant Persons shall be barred from: (a) directly or indirectly, buying, selling or otherwise effecting transactions in Financial Instruments (including the cancellation or alteration of orders placed before the Insiders in question became aware of the Inside Information), on their own account or on account of third parties, on the basis of Inside Information; (b) inducing or otherwise making recommendations to others, on the basis of Inside Information, to effect any of the transactions mentioned in subparagraph (a) above; (c) disclosing Inside Information to third parties other than in the normal course of the discharge of their professional duties or institutional or official functions. Inducing or making recommendations to others within the meaning of subparagraph (b) above shall be deemed to constitute unlawful disclosure of Inside Information in the event where the person engaging in such behavior knew or ought to have known that the recommendations in question were based on Inside Information.
- 5.3 Relevant Persons are barred from issuing interviews to the press and media, or in general, any declarations containing Inside Information not disclosed to the market pursuant to this Code.

6. POWERS AND RESPONSIBILITIES

6.1 **The Company's Board of Directors**

The Company's Board of Directors shall appoint, dismiss and replace the Disclosure Officer, defining the latter's powers and responsibilities — in accordance with the provisions of this Code — and appointing a Deputy Disclosure Officer to replace the Disclosure Officer in the event of the latter's absence or unfitness.

6.2 **The Company's Chief Executive Office**

- 6.2.1 The Company's Chief Executive Officer:
 - (a) manages Inside Information and the related procedures, as well as the relations between the Company and institutional investors and the press relations, availing for such purpose of the dedicated internal structures; and
 - (b) approves the notices referred to him by the Disclosure Officer.
- 6.2.2 All relations with the press and media involving the disclosure of Inside Information must be expressly authorized by the Company's Chief Executive Officer, or another subject appointed by the latter.

6.3 The Disclosure Officer

The Disclosure Officer is tasked with:

- (a) ensuring, with the assistance and support of the various corporate functions involved, the proper discharge of the reporting obligations imposed in respect of Insider Information under this Code, as well as applicable regulations;
- (b) liaising with the media and drawing up notices regarding Inside Information, with support from corporate functions.

6.4 Subsidiary Companies

The Board of Directors of each Subsidiary Company is in charge of: (a) managing any and all Inside Information pertaining to the Subsidiary Company in question; (b) reporting, through the director appointed for such purpose, or otherwise via the relevant corporate functions of the Subsidiary Company in question, any and all Inside Information pertaining to the said Subsidiary Company to Aquafil's Chief Executive Officer and the Disclosure Officer.

6.5 Relevant Persons

- 6.5.1 Any and all Relevant Persons who feel that the Company has an obligation to disclose to the market an Inside Information pertaining to events occurred in the course of the business of Aquafil or the Subsidiary Companies, of which such Relevant Person is aware, and in respect of which the related public disclosure obligations have not yet been fulfilled, shall report such fact without delay to the Disclosure Officer.
- 6.5.2 The Disclosure Officer shall promptly inform Aquafil's Chief Executive Officer of any and all reports received pursuant to the preceding paragraph (the *Report*).
- 6.5.3 Aquafil's Chief Executive Officer or at the latter's request the Board of Directors shall:
 - (a) assess, with input from the Disclosure Officer and/or the various corporate functions, whether or not the information forming the subject-matter of the Report, in fact, qualifies as Inside Information; and

(b) determine whether to disclose the said information to the market or, otherwise, delay such disclosure in accordance with the applicable regulatory provisions.

7. PROCEDURES FOR COMPLIANCE WITH THE COMPANY'S DISCLOSURE OBLIGATIONS IN RESPECT OF INSIDE INFORMATION

- 7.1 The Company shall:
 - (a) make public disclosure of Inside Information through the Disclosure Officer, as early as possible;
 - (b) ensure that Inside Information is publicly disclosed in accordance with procedures that enable the public to rapidly access and fully and properly assess the disclosed Inside Information;
 - (c) release the Inside Information, either directly or through third parties, to the media and specialist press with a public reputation for reliability in the proper dissemination of such information;
 - (d) publish and maintain accessible on its website for no less than five years any and all of the Inside Information disclosed to the public.
- 7.2 Should any Inside Information whatsoever fall into the possession of a third party who owes no duty of confidentiality (regardless of whether such duty is based on a law, regulations, bylaws, or a contract) as a result of deliberate or inadvertent disclosure of the said Inside Information by the Company or any subject acting on its account or on its behalf during the course of the discharge of professional duties or institutional functions, or should otherwise the confidentiality of any Inside Information be breached for any reason or cause whatsoever, the Company shall be bound to re-establish information symmetry by proceeding with the public disclosure of the Inside Information in question, it being understood that such public disclosure must be made (i) simultaneously, if the initial disclosure was deliberate; or (ii) in a timely manner, if the initial disclosure was inadvertent.
- 7.3 In the event of the breach of the confidentiality of any Inside Information whatsoever, the latter must be disclosed to the public at the earliest available opportunity.
- 7.4 The provisions of paragraph 7.3 above shall apply even in the case of rumors that are sufficiently accurate to suggest that the confidentiality of the related Inside Information is no longer ensured.

8. DELAYED DISCLOSURE

- 8.1 Aquafil may delay the public disclosure of Inside Information provided that all the following conditions are met:
 - (i) immediate disclosure is likely to prejudice Aquafil's "legitimate interests";
 - (ii) delayed disclosure is not likely to mislead the public;
 - (iii) the Company is capable of ensuring the confidentiality of the Inside Information in question.

- 8.2 Without prejudice to the conditions imposed under points (i), (ii) and (iii) above, the Company may, under its own responsibility, delay public disclosure of Inside Information pertaining to a protracted process that occurs in stages and that is intended to bring about, or that results in, a particular circumstance or a particular event.
- 8.3 Responsibility for the decision to delay public disclosure of inside information, and accordingly to depart from the obligation of immediate public disclosure, lies entirely with the person or party bound under the obligation to proceed with public disclosure. Aquafil must, therefore, assess not only the impact of delayed public disclosure on information symmetry on the market, but also the extent to which the confidentiality of the Inside Information in question can be protected.
- 8.4 In the event of delayed public disclosure, Aquafil shall be bound to ensure the confidentiality of the Inside Information and, should such confidentiality be breached for any reason or cause whatsoever, to re-establish information symmetry by proceeding with public disclosure.
- 8.5 Any and all decisions to delay the public disclosure of Inside Information, immediately after such information has been disclosed to the public, must be promptly notified by the Company in writing to Consob at the following e-mail address: consob@pec.consob.it, specifying, as recipient, the "Markets Division [Divisione Mercati]" and entering as the subject "MAR Delayed Disclosure [MAR Ritardo comunicazione]", or according to other methods established by Consob by subsequent instructions, in accordance with the laws and regulations in effect from time to time. The aforesaid notification is aimed at providing Consob with the date and time of its classification as inside information, the reason for delay, an explanation of the procedures through which the conditions imposed under paragraph 8.1 above were met, as well as the following elements: a) identity of the issuer (full company name); b) identity of the notifier (name, surname, position at the issuer); c) notifier's contact details (professional email address and telephone number); d) identification of the Inside Information subject to delayed public disclosure (title of the press release; reference number, if assigned by the system used to publish the inside information; date and time of the disclosure of the Inside Information to the public); e) date and time of the decision to delay public disclosure of the Inside Information; f) identity of all people responsible for the decision to delay public disclosure; and any and all other indications and data that the Company may consider relevant or otherwise useful to enabling Consob to properly assess the notified action, as well as to discharge its supervisory duties in respect of Financial Instruments in a timely manner.
- 8.6 Should the Company consider delaying public disclosure, the Disclosure Officer shall draw up and maintain in the Company's records a document specifying at least the following data:
 - (i) the dates and times when:
 - i. the Inside Information first existed within Aquafil;
 - ii. the decision to delay the disclosure of the Inside Information was made;
 - iii. the Inside Information is likely to be publicly disclosured by Aquafil;
 - (ii) identity of the persons within Aquafil who are responsible for:

- (a) taking the decision to delay public disclosure and the decision determining the beginning and probable end of the delay in public disclosure;
- (b) the ongoing monitoring of the conditions underlying the delay;
- (c) taking the decision to proceed with public disclosure of the Inside Information;
- (d) providing the requested information about the delay and the written explanation to Consob;
- (iii) evidence of the initial fulfilment of the conditions imposed under paragraph
 8.1 above and of any change in such fulfilment during the delay period, including an account of:
 - (a) the precautions and measures implemented to protect the Inside Information against access, both within the Company and from the outside, by persons other than those who, within the framework of the Issuer's organization, must be afforded access thereto in order to properly discharge their professional duties or assigned tasks and functions;
 - (b) procedures implemented to ensure the prompt public disclosure of the Inside Information in question in the event where the confidentiality thereof is breached.

The Disclosure Officer shall, moreover, record any and all subsequent changes in the information contained in the aforesaid document.

- 8.7 In all cases of delayed public disclosure, the Disclosure Officer shall draw up a document containing at least the following information:
 - (i) the identity of the issuer (full company name);
 - (ii) the date and time of the initial existence of the Inside Information;
 - (iii) the date and time of the decision to delay public disclosure and the probable date and time of the end of the delay;
 - (iv) the identity of not only the person/corporate function(s) responsible for the decision to delay public disclosure, but also the persons in charge of monitoring ongoing satisfaction of the conditions justifying the delay, as well as the persons tasked with the publication of the information and the persons in charge of notifying Consob of the delay (name, surname, position held within the issuer);
 - (v) contact details of the person in charge of notifying Consob;
 - (vi) a detailed description of the Inside Information subjected to delayed public disclosure: title of the disclosure notice; reference number, if assigned by the system used for the disclosure of the Inside Information; date and time of the public disclosure of the Inside Information;
 - (vii) date and time of the decision to delay public disclosure of the Inside Information in question;
 - (viii) proof of regulatory compliance, and that is to say, an account of not only the precautions implemented to prevent unauthorized access to the information in

question, but also the measures to be taken in the event of the breach of the confidentiality of the said information.

The aforesaid document must be maintained in the Company's records in a durable medium.

9. INSIDER REGISTER

General Rules

- 9.1 The Company has set up the Insider Register, which shall be maintained in such manner as to allow for ease of consultation and extraction of the data therein contained.
- 9.2 Availing of support from the corporate functions, the Disclosure Officer shall without delay register Insiders in the Insider Register and give the said Insiders timely notice of:
 - (i) their inclusion in the Insider Register and any and all updates concerning them;
 - (ii) the provisions of this Code.
- 9.3 The Insider Register is maintained in an electronic format that ensures at all times:
 - that access of the Insider Register is restricted solely to the Disclosure Officer and persons clearly identified by the Disclosure Officer as requiring such access on account of the nature of their respective functions within the Company;
 - (ii) the confidentiality and accuracy of the information recorded in the Insider Register;
 - (iii) access to previous versions of the Insider Register.
- 9.4 Upon request, the Disclosure Officer shall forward a list of all the Company's Insiders to Consob as early as possible, at the following e-mail address consob@pec.consob.it.

Individuals or Legal Entities Recorded in the Insider Register

- 9.5 The Insider Register is made up of two sections, (i) the first pertaining to Insiders with access to all Inside Information at all times, and (ii) the second pertaining to the Insiders with occasional access to Inside Information. A Register Model, reflecting the aforesaid subdivision and completed with the information that the Inside Register must contain is attached hereto as <u>Annex 2</u>.
- 9.6 Whenever new Inside Information is identified, a new subsection is included in the Insider Register dedicated to Insiders with occasional access to Inside Information.
- 9.7 The information pertaining to the Insiders are kept for five years following the date on which the circumstances that warranted the registration or update no longer prevail.

Procedures for Keeping the Register

- 9.8 The Insider Register shall be maintained by the Disclosure Officer, with support from the other corporate functions, with all related processes and procedures being specifically designed to streamline access to, as well as the management, consultation, extraction and printing of data. More specifically, the Disclosure Officer, or a person appointed by him or her for such purpose, shall be in charge of including Insiders in the Insider Register, updating the data pertaining thereto, as well as removing them from the said Register. Any and all updates must mention the date and time of the occurrence of the change underlying the update.
- 9.9 In order to streamline the setting up and updating of the Insider Register, the governing and control bodies, as well as any and all pertinent corporate functions of Aquafil and the Subsidiary Companies shall give the Disclosure Officer or the persons appointed by the latter timely notice of the names and relevant personal details of Insiders, as well as of any and all updates to be brought to the Insider Register, and any and all cancellations to be effected.
- 9.10 The Disclosure Officer shall notify Insiders (by forwarding to the latter, the form attached hereto as <u>Annex 3</u>) of their inclusion in the Insider Register, as well as of any and all cancellations and/or updates of their personal details recorded in the said register. The Disclosure Officer shall also ensure that all Insiders are informed of their obligations under this Code.

Obligations binding on Insiders

- 9.11 All Insiders are bound to comply with the provisions of this Code.
- 9.12 The Insiders shall implement suitable measures to hinder access to Inside Information by persons other than those who require such access in order to perform the tasks assigned to them. In particular, Insiders shall access, manage and archive Inside Information only to the extent and for the time strictly necessary to perform the tasks they have been assigned, and in any event, in scrupulous compliance with the common rules of professional diligence aimed at ensuring the greatest possible confidentiality.

10. GENERAL PROVISIONS

Disciplinary Sanctions

10.1 In the case of non-compliance with the provisions of this Code on the part of the members of the Board of Directors or the Board of Statutory Auditors of Aquafil or any of the Subsidiary Companies, without prejudice to the liability and disciplinary measures contemplated under law, the Board of Directors or the Board of Statutory

Auditors in question shall determine the remedial and/or other measures to be implemented within the bounds of applicable regulations.

- 10.2 Employees who commit violations of this Code shall be subjected to the disciplinary measures contemplated in the applicable national collective bargaining labor agreements, including, in the most serious cases, dismissal, and in any event, without prejudice to any and all other liability arising under the provisions of applicable legislation and regulatory framework.
- 10.3 Persons collaborating with and/or rendering professional services to Aquafil and/or the Subsidiary Companies under contractual arrangements that do not entail an employment relationship, and who stand in breach of the provisions of this Code, shall be subjected to the sanctions contemplated under the applicable statutory and contractual provisions, including, in the most serious cases, the termination of including without notice or withdrawal from the underlying contract, without prejudice to any and all other liability, including for compensatory damages, arising under the applicable regulatory framework.

Amendments and Extensions

- 10.4 Aquafil's Board of Directors shall bring hereto any and all the amendments and extensions that may be necessary or useful in light of organizational changes within Aquafil or one or more of the Subsidiary Companies, or otherwise, regulatory reforms. More specifically, this Code shall be amended and/or extended in a timely manner following the full transposition into Italian legislation of the provisions of Regulation 596/2014 (and subsequent statutory instruments and implementing provisions issued by the European Commission as complements to the same), as well as of Directive 2014/57/EU of April 16, 2014 on criminal sanctions for market abuse.
- 10.5 The Disclosure Officer shall give timely notice of any and all amendments and/or extensions hereto to all the recipients hereof.

Notices

Any and all notices to be served pursuant hereto, must be evidenced in writing and forwarded as follows:

- (a) in the case of notices to be served on the Disclosure Officer, via facsimile transmission for his or her attention, to the number +39 0464 532 267 or by email to the following address <u>registroinsider@aquafil.com</u>, or otherwise by registered letter with acknowledgment of receipt addressed to: Aquafil S.p.A., via Linfano 9, 38062 Arco (Trento), Italy;
- (b) if addressed to Relevant Persons, as per the addresses and contact information provided by the said persons in the acceptance form contained in <u>Annex B</u> hereto;

or to such addresses and by such other means as may be notified in timely manner: (i) by the Disclosure Officer to all the Relevant Persons; or (ii) by any of the latter to the Disclosure Officer.

ANNEX 1

- having acknowledged that I have been included in Aquafil S.p.A.'s Insider Register;

- having confirmed that I have received a copy of Aquafil S.p.A.'s "Code on the Handling of Inside Information" (the *Code*) and having read and fully understood the provisions thereof;
- fully aware of the obligations binding on me under the Code and applicable regulatory provisions (including Articles 184 *et seqq*. of Legislative Decree No. 58/1998)

DO HEREBY DECLARE

- (i) that I am aware of and accept the provisions of the Code and further undertake to comply with the same, with the greatest diligence, and in respect of all matters falling within my sphere of competence;
- (ii) and provide the following personal contact numbers and addresses: tel. +39 0464 581
 224, fax +39 0464 532 267 e-mail address <u>registroinsider@aquafil.com</u>.

(Date)

(Signature)

Pursuant to and for the intents and purposes of Legislative Decree No. 196/2003, I hereby moreover consent to the processing of any and all personal data contained in this form, with a view to ensuring full compliance with the provisions of the Code and the applicable provisions cited therein.

(Date)

(Signature)

in

ANNEX 2

Insider List – Section [indicate the specific inside information pertaining to a contract or event]

Date and time (when this section of the list was created or when the inside information was identified): [yyyy-mm-dd, hh:mm UTC (coordinated universal time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (coordinated universal time)]

Date of submission to the regulatory authority: [yyyy-mm-dd]

First name(s) of the insider	Surname (s) of the insider	Birth surname(s) of the insider (if different)	Profession al telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Obtained (the date and time at which a person obtained access to inside informati on)	Ceased (the date and time at which a person ceased to have access to inside informati on)	Date of birth	National Identifica tion Number (if applicabl e)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address(street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numbe rs (no space)]	[Address of issuer/emission allowance market participant/auction platform/auctioneer /auction monitor or third party of insider]	[Text describing role, function and reason for being on this list]	[yyyy- mm-dd, hh:mm UTC]	[yyyy- mm-dd, hh:mm UTC]	[yyy y- mm- dd]	[Number and/or text]	[Numbers (no space)]	[detailed personal address of the insider - Street name and number - City - Post/zip code - Country]

Insider List - Section dedicated to Permanent Insiders

Date and time (when the section dedicated to permanent insiders was set up) [yyyy-mm-dd, hh:mm UTC (coordinated universal time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (coordinated universal time)]

Date of submission to the regulatory authority: [yyyy-mm-dd]

First name(s) of the insider	Surnam e(s) of the insider	Birth surname(s) of the insider (if different)	Professio nal telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which a person was included in the permanent insider section)	Date of birth	National Identificati on Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address(street name; street number; city; post/zip code; country)
[Text]	[Text]	[Text]	[Numb ers (no space)]	[Address of issuer/emission allowance market participant/aucti on platform/auction eer/auction monitor or third party of insider]	[Text describing role, function and reason for being on this list]	[yyyy-mm- dd, hh:mm UTC]	[yyyy -mm- dd, hh:m m UTC]	[yyyy-mm- dd]	[Number and/or text]	[detailed personal address of the insider - Street name and number - City - Post/zip code - Country]

ANNEX 3

Form 1 – Notice of inclusion in the InsiderRegister

Dear

In compliance with the provisions of Article 18 of Regulation (EU) No. 596/2014, Commission Implementing Regulation No. 347/2016 and other applicable regulations, as well as Aquafil S.p.A.'s "Code on the Handling of Inside Information" (the Code, attached hereto as Annex 1 and available for consultation at the website www.aquafil.com), I hereby inform you that your personal data have been included in Aquafil S.p.A.'s Insider Register for the following reason:

Best regards,

Aquafil S.p.A.'s Disclosure Officer

(signature)

(place)

(date)

Kindly bear in mind that: (a) Insiders (as defined in the Code) must comply with the provisions of the Code; and (b) non-compliance with applicable statutory and regulatory provisions pertaining to inside information could constitute criminal or administrative offences (including, in particular, as contemplated in Articles 184 *et seqq.* of Legislative Decree No. 58/1998) and could give rise to situations exposing the Company to the incurrence of vicarious corporate liability (within the meaning of Legislative Decree No. 231/2001).

Form 2 – Notice of the updating of the personal data recorded in the Insider Register

Dear____,

In compliance with the provisions of Article 18 of Regulation (EU) No. 596/2014, Commission Implementing Regulation No. 347/2016 and other applicable regulations, as well as Aquafil S.p.A.'s "Code on the Handling of Inside Information" (the *Code*, available for consultation at the website <u>www.aquafil.com</u>), I hereby inform you that on ______ your personal data subject to processing (surname, name, tax code, employer company, reason for inclusion in the Insider Register) were updated for the following reason: ______.

Best regards,

Aquafil S.p.A.'s Disclosure Officer

(signature)

(place)

(date)

Form 3 – Notice of Removal from the Insider Register

Dear____,

In compliance with the provisions of Article 18 of Regulation (EU) No. 596/2014, Commission Implementing Regulation No. 347/2016 and other applicable regulations, as well as Aquafil S.p.A.'s "Code on the Processing of Inside Information" (the *Code*, available for consultation at the website www.aquafil.com), I hereby inform you that on ______ the reasons for your inclusion in the Insider Register no longer prevail. Therefore, your personal data subject to processing (surname, name, tax code, employer company, reason for your inclusion in the Insider Register) shall be cancelled pursuant to point 9.10 of the Code.

Best regards,

Aquafil S.p.A.'s Disclosure Officer

(signature)

(place)

(date)