



## Procedure for the internal management and public disclosure of Inside Information



# **Procedure for the internal management and public disclosure of Inside Information**

**in accordance with the provisions of Regulation (EU) No.  
596/2014 of 16 April 2014 on market abuse**

**Traditional administrative and control model**

**Issuer: Technoprobe S.p.A.**

**(hereinafter referred to as "Technoprobe" or "Company")**

**Website**

**[www.technoprobe.com](http://www.technoprobe.com) - section "Governance/Company  
documentaion"**

**Approved by the Board of Directors**

**On June 24, 2026**

**Technoprobe S.p.A.**

**Registered Office Via Cavalieri di Vittorio Veneto n. 2 – Cernusco  
Lombardone**

**Tax Code: 02272540135**

**Share capital: € 6.532.608,70**

**Economic Administrative Index (R.E.A.) n. 283619**

## 1. Purpose of the Procedure

This procedure which sets out the rules governing inside information and the processing thereof as regards the internal management and public disclosure of documents and information (the “**Procedure**”) pertaining to the Company is adopted in accordance with the provisions of Regulation (EU) No. 596/2014 of 16 April 2014 on market abuse, as amended from time to time, and the relevant implementing regulations. The Procedure aims to ensure compliance with the provisions of the law and regulations in force on the subject and ensure the Issuer’s timely, complete and adequate disclosure to the market of the Group’s inside information, while ensuring the utmost confidentiality and secrecy of information up to the time of public disclosure.

Any amendments and/or additions to this Procedure shall enter into force on the day of publication of the Procedure on the Company’s website, or -where the amendments concern statutory or regulatory provisions of an immediately binding nature- on the day otherwise provided for by law or regulations.

For any matters that are not expressly provided for in this Procedure, reference is made to the provisions on the dissemination of price-sensitive information and corporate information laid down by the laws and regulations (including European ones) applicable from time to time.

## 2. Definitions

In addition to terms which may be defined in other Articles of this Procedure, capitalised terms which are not otherwise defined shall have the meaning ascribed to them in this Article.

**Managing Director:** means the managing director of the Company;

**Shares:** means the ordinary shares of the Company that were admitted to trading on Euronext Milan.

**Board of Statutory Auditors:** means the Company’s Board of Statutory Auditors in office from time to time.

**Board of Directors:** means the Company’s Board of Directors, in office from time to time.

**Subsidiaries:** means the companies controlled by the Company in accordance with Article 93 of TUF.

**Employees:** means the employees of the Company or its Subsidiaries who are not included among the Relevant Persons.

**Relevant Events:** has the meaning specified in Article 8 of this Procedure.

**Group:** means the Company and its Subsidiaries.

**Inside Information:** means, under Article 7 of the MAR, information (i) of a precise nature, (ii) which has not been made public, (iii) relating, directly or indirectly, to the Issuer or one or more of the Issuer’s financial instruments, and (iv) which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related

derivative financial instruments; meaning, for this purpose, information that a reasonable investor would be likely to use as part of the basis for his or her investment decisions. Information is considered to be of a precise nature if:

- a) it refers to a series of circumstances that have occurred or circumstances that can reasonably be expected to occur or to an event that has occurred or that can reasonably be expected to occur; and
- b) it is sufficiently specific to allow conclusions to be drawn on the possible effect of the set of circumstances or the event referred to above on the prices of financial instruments or the related derivative financial instrument. In this respect in the case of a Protracted Process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

An intermediate step in a Protracted Process (as defined hereinafter) shall be deemed to be inside information if, in itself, meets the above mentioned criteria regarding inside information. For the purposes of the disclosure obligations to the public of intermediate steps in a Protracted Process, reference should be made to Section 4.

**Relevant Information:** means information relating to data, events, projects or circumstances that, on a continuous, repetitive, periodical, occasional or unforeseen basis, directly concerns the Company, also with reference to one or more Subsidiaries, and which has all the characteristics to turn into Inside Information at a later date, even in the near future, but which is not yet precise enough to be considered as such.

**Confidential Information** means corporate information relating, directly or indirectly, to the Company and/or its Financial Instruments, which, while not having the characteristics of Inside Information or Relevant Information, is not in the public domain and which, due to its subject matter or other characteristics, is in any case of a confidential nature towards parties not bound by confidentiality obligations under current legislation or contractual agreements.

**MAR or Market Abuse Regulation:** means Regulation (EU) No 596/2014 on market abuse as subsequently amended and supplemented.

**Protracted Process:** means a process involving a series of actions, steps or decisions carried out over time which must be implemented, at least in part, by the Company in order to achieve a given objective or result.

**Issuers' Regulation:** means the Regulation CONSOB adopted with provision no. n. 11971 on May 14, 1999 as subsequently amended and supplemented.

**Service for the Dissemination of Regulated Information (“*Servizio per la Diffusione dell’Informativa Regolamentata*”) or SDIR:** means a service for the dissemination of regulated information in accordance with CONSOB regulations which disseminates such information to the public, to Borsa Italiana and to CONSOB.

**Company:** means Technoprobe S.p.A..

**Relevant Persons** means:

- i. the members of the Company’s Board of Directors and the Board of Statutory Auditors;
- ii. persons performing management functions in the Company and Employees who have regular access to Relevant and Inside Information and hold decision-making powers with respect to decisions that may affect the development and prospects of the Company; as well as all other persons who, due to their office duties, participate in the meetings of the management body relating to all those Relevant and Inside Information about the Company;
- iii. persons performing the functions referred to in points i) and ii) above in a Subsidiary directly or indirectly controlled by the Company;
- iv. persons who, while carrying out their work or function, or performing their tasks, have access to Inside Information;
- v. any other person who possesses Inside Information in circumstances other than those referred to in the previous points, where that person knows or ought to know that it is Inside Information.

**“Financial Instruments”:** means financial instruments of the Company as defined under Article 4, section 1, point 15), of Directive 2014/65/EU: (a) admitted to trading on a regulated market or for which a request for admission to trading on a regulated market has been made; (b) traded on a multilateral trading facility, admitted to trading on a multilateral trading facility or for which a request for admission to trading on a multilateral trading facility has been made (c) traded on an organised trading facility; or (d) the price or value of which is dependent on, or has an effect on, a financial instrument listed in (a)-(c) above (including, but not limited to, credit default swaps and contracts for differences).

**TUF:** means Legislative Decree No. 58 of 24 February 1998, as amended.

**Investor Relator:** means the head of the Company’s Investor Relations Office.

### **3. Recipients of the Procedure**

This Procedure applies to the Relevant Persons and Employees (the “Relevant Persons”) and contains the provisions relating to the management and processing of Relevant Information, Confidential Information and Inside Information as well as the methods of public disclosure of documents and information concerning the Company and its Subsidiaries, with particular reference to Inside Information.

### **4. Obligations and prohibitions applying to the recipients and obligations applying to the Company**

In order to protect the Company’s interest in the confidentiality of its business and to avoid market abuse, the Relevant Persons shall treat as confidential all Relevant Information, Confidential Information and/or Inside Information of which they become aware in the performance of their duties.

In particular, the Relevant Persons are required to:

- I. maintain secrecy about Confidential Information, Relevant Information and Inside Information;
- II. process any Relevant, Confidential and Inside Information only through authorised channels, adopting all necessary precautions so that any instances of dissemination of such information within the company do not prejudice the confidential nature of the information itself;
- III. ensure that all Confidential Information, Relevant Information and Inside Information is processed by taking all appropriate precautions so that any instances of dissemination of such information do not prejudice its confidential nature until it is disclosed to the market or disclosed in accordance with the law or otherwise in the public domain, and in any case in compliance with this Procedure.

The Relevant Persons are prohibited from doing any of the following:

- I. to share, disseminate or disclose in any way and by any means such information to persons other than those to whom such disclosure is necessary in order to enable them to perform their duties within the Company or the Group;
- II. to use Inside Information for the purpose of acquiring or disposing of the Financial Instruments to which such information relates, on their own behalf or on behalf of third parties, either directly or indirectly or by disclosing it to third parties, and prior to Inside Information being disclosed in accordance with this Procedure and with the applicable provisions of law;
- III. to use Inside Information by cancelling or amending an order concerning a Financial Instrument to which the Information relates in circumstances in which the order was placed before the Relevant Person had access to such Inside Information;
- IV. to recommend or induce others, on the basis of Inside Information in their possession, to carry out transactions concerning the Financial Instruments to which such Information refers.

Article 9 of the MAR provides for certain lawful conduct which, if carried out, means that there was no insider dealing.

Pursuant to Article 17 of the MAR, the Company shall disclose to the public, without delay, Inside Information directly concerning the Company, including information relating to its Subsidiaries where such information is capable of qualifying as Inside Information for the Issuer itself, in accordance with the procedures set out in Article 10 below.

Such obligation shall not apply to Inside Information relating to intermediate steps in a Protracted Process, where such steps are connected to the bringing about or resulting in particular circumstances or a particular event. In a Protracted Process, only the final circumstances or final event shall be disclosed as soon as possible after their occurrence,

without prejudice to the Company's obligation to ensure the confidentiality of the Inside Information until its disclosure to the public.

The Company shall give the necessary instructions to its Subsidiaries in order to ensure that they provide all information required to comply with the disclosure obligations provided for by applicable law and the MAR. The Subsidiaries shall promptly transmit the requested information.

## **5. Processing Relevant Information, Confidential Information and Inside Information**

The Managing Director is the Company's pro tempore function in charge of the application and management of this Procedure and holds all the powers, resources and competences for the performance of the tasks assigned to him/her. In this respect, the Managing Director shall work, where necessary or appropriate, together with the Company's internal functions concerned from time to time depending on the content of each piece of information.

The Managing Director is responsible for the processing of Relevant and Inside Information concerning the Company. In his/her absence, this responsibility shall lie with the Chairperson of the Board of Directors or, in his/her absence, by the Vice-Chairperson. Each of them, at the relevant times, shall be responsible for the processing of Inside Information (the **"Person Responsible for Relevant and Inside Information"**).

The Person Responsible for Relevant and Inside Information shall carry out the processing of Relevant and Inside Information, with the support of the Company's internal functions from time to time concerned depending on the content of each piece of information, while keeping such Information confidential and ensuring that it is disclosed only on a need-to-know basis, and shall ensure that said information may only be disseminated within the Company without prejudice to its potentially inside nature. The Person Responsible for Relevant and Inside Information, where he/she deems it appropriate, shall inform the Board of Directors of the contents and methods he/she intends to apply for the dissemination of said information.

## **6. Assessing the "inside" nature of information**

The Relevant Persons must promptly notify the Person Responsible for Relevant and Inside Information of any information concerning the Company or its Subsidiaries that may be classified as Relevant Information, and of any Relevant Events, as defined below, of which they may become aware by virtue of their work or professional activities, or by virtue of the functions performed. Furthermore, if the Relevant Information relates to events or transactions that are part of a protracted process, they shall inform the Person Responsible for Relevant and Inside Information of the relevant progress and keep them updated periodically with the frequency required by the nature of the event or transaction.

The person responsible for notifications concerning the Subsidiaries shall promptly notify the Company's Managing Director of any Relevant Information that was identified in the Subsidiaries.

Once a specific piece of Relevant Information is identified, the Person Responsible for Relevant and Inside Information shall set up a dedicated section of the List and shall monitor

the development progress of the Inside Information; the Person Responsible for Relevant and Inside Information shall note the moment when the Relevant Information becomes Inside Information.

The Person Responsible for Relevant and Inside Information, in consultation with the Investor Relator, is responsible for assessing the inside nature of the information and, therefore, for fulfilling the public disclosure requirement under the MAR, or initiating the delayed disclosure procedure pursuant to Article 11 below. In any case, it is understood that the Person Responsible for Relevant and Inside Information shall always be entitled to refer the assessment above to the Board of Directors as a whole.

The Company shall formalise this decision and shall record the following information on a technical tool that ensures accessibility, readability and preservation of the information on a durable medium:

- date and time at which the information became of inside nature;
- date and time at which the Company took a decision on the matter;
- identity of the persons who took the decision or participated in its formation

## **7. Exclusions**

The Company, subject to the prior consent of the Person Responsible for Relevant and Inside Information, and to the existence of an obligation of confidentiality, a legitimate relationship as grounds for disclosure, and suitable organisational measures for protecting the Relevant Information, may disclose Relevant Information, Confidential Information and/or Inside Information, provided that disclosure takes place exclusively for the purpose of exercising the Company's functions and in compliance with the provisions of the applicable legal and/or regulatory provisions, and by ensuring that confidentiality is protected.

Disclosure may be made, by way of example, to the following persons:

the Company's consultants and any other person involved or likely to be involved in the developments or matters in question;

the auditing company that is responsible for auditing the Company's accounts;

persons with which the Company is negotiating or intends to negotiate any commercial, financial or investment transactions (including prospective underwriters or placers of its Financial Instruments);

banks as part of their lending activities;

rating agencies;

Employee representatives or trade unions representing them;

any government office, the CONSOB, the Bank of Italy, the Italian Competition Authority, the Italian Stock Exchange and any other institutional or regulatory body or authority.

The above-mentioned persons may not disclose Inside Information or Relevant Information pertaining to the Company and information concerning Subsidiaries in any way, in Italy or abroad. To this end, the Company shall inform them in writing and enter into confidentiality

agreements so that they expressly agree to (i) receive such information, (ii) refrain from using such information, or attempting to use it, by deleting or amending an order that was already placed concerning a Financial Instrument as referred to in Article 4 of the Procedure, and (iii) keep such information confidential.

The aforementioned obligations shall be fulfilled in so far as the Inside Information, as disclosed to them in confidence, is disclosed to the public in accordance with the MAR.

It should be noted that Inside Information may be disclosed to third parties only to the extent that the delayed disclosure procedure referred to in Article 11 of this Procedure has been initiated.

Where the Person Responsible for Relevant and Inside Information has reason to believe that the confidentiality obligation over Inside Information has been or is likely to be breached and, in any case, the matter is such that knowledge of such Information would be likely to lead to a substantial change in the price of Financial Instruments, the Person Responsible for Relevant and Inside Information must publish such information without delay.

Article 9 of the MAR, to which reference is made, provides for certain lawful conduct which, if carried out, means that no insider dealing may arise.

## 8. Possible events producing Inside Information

The following is an illustrative and non-exhaustive list of types of inside information that may be relevant to an issuer (each a “**Relevant Event or Events**”). In particular, this is information relating to:

- a) ownership structures;
- b) management composition;
- c) management incentive plans;
- d) auditors’ activities;
- e) capital transactions;
- f) issuance of financial instruments;
- g) characteristics of the financial instruments issued;
- h) acquisitions, mergers, demergers, etc;
- i) restructuring and reorganisations;
- j) transactions on financial instruments, buy-back and accelerated book-building;
- k) insolvency proceedings;
- l) legal disputes;
- m) withdrawal of bank credit facilities;
- n) write-downs/revaluations of assets or portfolio financial instruments;
- o) patents, licences, rights, etc;

- p) insolvencies of major debtors;
- q) destruction of or damage to uninsured assets;
- r) purchase or sale of assets;
- s) operating trend;
- t) changes in expected accounting results (profit warning and earning surprise);
- u) receipt or cancellation of important orders;
- v) entry into (or exit from) new markets;
- w) modification of investment plans;
- x) dividend distribution policy;
- y) all other types of information as may be specified by Consob from time to time.

In addition, the following, by way of example, are Relevant Events indirectly concerning the Company and/or the Group and its Financial Instruments:

- i. data or reports published by statistical authorities;
- ii. analysis of rating companies, research, recommendations, concerning valuations of Financial Instruments;
- iii. central Banks' decisions on interest rates;
- iv. governmental measures of a fiscal, regulatory or other nature concerning the markets in which the Company and/or the Group operates;
- v. measures of the market management company relating to the regulation of the market; and
- vi. measures of the market supervisory or competition authorities.

## **9. Confidentiality throughout the development of Inside Information**

Relevant Persons shall take all appropriate measures and precautions to:

- a) prevent any unauthorised persons accessing and acquiring confidential information that may be Relevant Information, Confidential Information or Inside Information, while keeping all documents and information acquired in the performance of their duties confidential;
- b) use any such documents and Information solely in the performance of their duties;
- c) keep such documents in their possession in such a way as to limit the risk of unauthorised access and processing;
- d) ensure that the opening and distribution of correspondence received through the

postal service is carried out on a confidential basis.

Relevant Persons who hold documents or information which may potentially be Inside Information must store such documents and information in such a way as to minimise the risks of unauthorised access and processing, by implementing appropriate security measures. If any “confidential” documents are received (by mail, including electronic mail, or fax), the recipient shall personally be responsible (including through an authorised person) for having the documents collected, documents which must not remain accessible to third parties or be left unattended within the relevant interconnection devices.

The sender of any paper and/or electronic documents concerning Relevant Information, Confidential Information, or Inside Information, which is the subject of the delayed disclosure procedure, must highlight its strictly confidential nature by adding the wording “STRICTLY CONFIDENTIAL”.

The Relevant Persons shall be personally responsible for storing the confidential documentation they come into possession of and shall ensure that such documentation is stored in a suitable place such as to allow access only to authorised persons. In the event that any documents relating to Relevant Information, Confidential Information or Inside Information are lost, the Relevant Persons shall promptly notify the Person Responsible for Relevant and Inside Information, specifying the relevant conditions and circumstances, to enable the latter to take the appropriate measures, including issuing a press release.

## **10. Public disclosure of Inside Information pertaining to the Company or its Subsidiaries**

The Person Responsible for Relevant and Inside Information is responsible, on behalf of the Company and through the Investor Relator, for handling - possibly also by means of appropriate delegation of powers - all relations with the media, professional investors, financial analysts and shareholders.

Disclosure of Inside Information to the market shall in any case be performed in a clear, complete and timely manner, by avoiding any discrepancies in the information provided to investors and giving rise to situations that may in any case alter price trends.

If the information may be classified as Inside Information, any public disclosure of the same is the exclusive responsibility of the Person Responsible for Relevant and Inside Information, who, in agreement with the Investor Relator, shall determine whether the Information is subject to the rules set out in Articles 7 and 17 of the MAR.

The Company shall promptly disclose Inside Information directly pertaining to the Company to the market by means of a specific press release in such a way as to allow quick access and a complete, proper and timely evaluation, while avoiding using the Information disclosure as a way to promote its business. The Inside Information shall be circulated as soon as possible, i.e. straight after the time strictly necessary to (i) draft the relevant press release and circulate it; or (ii) consider whether the requirements necessary to delay its publication are met.

The Person Responsible for Relevant and Inside Information, with the assistance of the Investor Relator, shall prepare a complete and accurate draft press release with respect to the

Inside Information to be published and the Investor Relator shall disclose the communications relating to Inside Information to the public in compliance with the primary and secondary regulations in force at the time.

The Company shall also inform the public of any significant change in the Inside Information already disclosed. In case of previously disclosed Inside Information, the press release shall be structured in such a way as to allow the market to assess the evolution over time of the set of circumstances or events that constitute its subject matter by means of adequate updates and links with the previously disclosed Inside Information.

If Inside Information has been disclosed to the public in a manner that does not comply with this Procedure, the Company, with the aid of the Investor Relator, shall disclose such information to the public simultaneously (on the same day) in the case of intentional disclosure and without delay (on the same day on which the Managing Directors are informed of the disclosure) in the case of non-intentional disclosure.

After making Inside Information public, the Company shall keep it on its website for at least five years. The Company's website must meet the following requirements:

- i. allow users to access Inside Information published therein without discrimination and free of charge;
- ii. allow users to find Inside Information in an easily identifiable section of the site;
- iii. ensure that Inside Information made public clearly specifies the date and time of disclosure and is presented in chronological order.

Public disclosure of Inside Information concerning Subsidiaries is in any case the responsibility of the Company. Subsidiaries must therefore refrain from independently circulating Relevant or Inside Information to the public.

If announcements are made on the open market, the Investor Relator, in coordination with the Managing Director, shall give advance notice, including briefly, to Borsa Italiana S.p.A. and Consob, in order to allow the authorities to exercise their respective supervisory activities.

In the event that the Company or another company of the Group organises or participates in restricted meetings with financial analysts, institutional investors or other financial market operators, the Person Responsible for Relevant and Inside Information shall (a) inform Consob and the market management company in advance of the date, place and main topics of the meeting; (b) share the documentation made available to the participants in the meeting with Consob and the market management company, at the latest at the same time as the meetings are held. If, in the course of meetings with financial market players, any Inside Information is disclosed, the Person Responsible for Relevant and Inside Information shall ensure that the information is disclosed to the public as soon as possible in the manner provided for in this Article.

In any case, where the documents and information contain references to specific data (economic data, equity data, financial, operational, investment, staff employment data, etc.), such data must be validated in advance by the competent internal functions and, if requested by the applicable law, by the officer in charge of the preparation of company accounting.

## **11. Delayed disclosure of Inside Information**

### **11.1. Conditions for Delayed Disclosure**

Article 17(4) of the MAR sets the conditions and limits within which persons bound by disclosure obligations (issuers of financial instruments admitted to trading on a regulated market) may, on their own responsibility, lawfully delay the disclosure of Inside Information to the market, provided that this will not mislead the public about essential facts and circumstances and that the Company is able to ensure confidentiality of the Inside Information.

In particular, under Article 17(4) of the MAR, the Company may, on its own responsibility, delay the disclosure of Inside Information to the public, provided that all the following conditions are met:

- a) immediate disclosure is likely to prejudice the legitimate interests of the Company;
- b) the Inside Information in respect of which the Company intends to delay disclosure is not in contrast with the latest public announcement or other type of communication by the issuer or emission allowance market participant on the same matter to which such Inside Information relates. the Company is able to ensure the confidentiality of such Inside Information.

The failure by the Company to disclose Inside Information relating to intermediate steps in a Protracted Process pursuant to Article 17(1) of the MAR shall not be subject to the obligations set out in paragraph 4 of the same Article, without prejudice to the Company's obligation to ensure the confidentiality of such information until its disclosure to the public

The decision to delay the disclosure of Inside Information shall be taken by the Person Responsible for Relevant and Inside Information.

In the case of matters falling within the responsibilities of the Board of Directors, or in any case where the Person Responsible for Relevant and Inside Information deems it necessary, the Person Responsible for Relevant and Inside Information may refer the decision on the delayed disclosure to the Board of Directors. Assessments as to whether the Conditions for Delayed Disclosure exist may potentially be conducted with the support of the Legal Department and of the Company's competent corporate structures from time to time.

### **11.2. Duties to perform upon initiating the delayed disclosure procedure**

If the delayed disclosure procedure is applied, the Person Responsible for Relevant and Inside Information shall adopt any measure that they deem appropriate, in the specific case and taking into account the type of Inside Information as well as the electronic and/or paper format of the document in which it is contained, to ensure that the delayed Inside Information is kept secret and confidential, also in order to prevent access to it from persons who do not need to have access to Inside Information in the ordinary performance of their professional tasks or activities, i.e., persons who do not need to know the Inside Information.

In this regard, the Person Responsible for Relevant and Inside Information:

- i. shall ensure that persons who have had access to Inside Information which has not been disclosed receive, also by e-mail, a specific disclaimer letter, to be kept on file in the Company. In addition to including a reminder of the legal and regulatory duties deriving from the knowledge of Inside Information, the disclaimer shall require confirmation and acknowledgement that the recipient is aware of the potential sanctions that may be applied in case insider dealing is committed or an unauthorised disclosure of Inside Information takes place;
- ii. shall prepare a draft press release on the Inside Information whose disclosure to the public has been delayed in order to ensure timely publication of the Inside Information in the event that the conditions justifying delayed disclosure cease to exist.

If, pursuant to paragraph 11.1 above, the decision was taken to delay disclosure of Inside Information, the Company shall ensure that the following information is stored on a durable medium:

1. date and time:
  - on which the inside information was created for the first time within the Company;
  - of the decision to delay the disclosure of Inside Information; and
  - of the Company's likely disclosure of the Inside Information;
2. the identity of the individuals responsible for:
  - taking the decision to have the disclosure of the Inside Information delayed and setting the beginning of the period of delay and its likely end;
  - the ongoing monitoring of the conditions for the delayed disclosure;
  - taking the decision to either disclose the Inside Information to the public at the end of the time period set for the delay or during such time period; and
  - providing CONSOB with the requested information on the delayed procedure and an explanation in writing;
3. evidence of the initial fulfilment of the conditions for the delayed disclosure and of any changes therein occurring during the period of delay, including:
  - The information barriers which have been put in place internally and *vis-à-vis* third parties to prevent access to the Inside Information by persons other than those who require it for the normal exercise of their work, profession or duties within the Company; and
  - the arrangements that were put in place for the Inside Information the subject of the delayed disclosure procedure to be immediately disclosed as soon as this Information is no longer confidential

### **11.3. Notification of the delayed disclosure procedure and disclosure of the Inside Information**

Where the delayed disclosure procedure relating to Inside Information is applied, the Company shall implement the safeguards and apply the procedures provided for in Commission Delegated Regulation No. 2016/1055/EU. The Company that has delayed the

disclosure of Inside Information shall notify Consob of such delay in accordance with the procedures set out in CONSOB Communication No. 0061330 of 1 July 2016, immediately after the disclosure of Inside Information.

The Investor Relator shall prepare the notification together with the other competent corporate functions from time to time. The Investor Relator shall provide it to Consob by certified e-mail to the address [consob@pec.consob.it](mailto:consob@pec.consob.it), by specifying “Markets Division” as the addressee and indicating at the beginning of the subject line “Delayed Disclosure MAR”.

In the event that the Company has delayed disclosing Inside Information and this information subsequently loses its “inside” nature, the Company shall not be obliged to disclose this information either to the public or the competent Authority (where applicable), without prejudice to the obligations deriving from the Procedure setting requirements in relation to the List of persons who have had access to Inside Information.

In the event of a delay in public disclosure of inside information, the Company shall, at the subsequent request of CONSOB, provide documentation proving that it has fulfilled its obligation under Article 17(4) of the MAR and the relevant technical implementing rules.

If the disclosure of Inside Information is delayed in accordance with the provisions of the aforementioned article or where the Inside Information relating to intermediate steps in a Protracted Process has not been disclosed pursuant to Article 17(1) of the MAR the Company shall disclose the Inside Information to the public as soon as possible. Similarly, if rumours explicitly refer to Inside Information whose disclosure has been delayed pursuant to Article 11 above or to intermediate steps in a Protracted Process that have not been disclosed pursuant to Article 17(1) of the MAR, where such rumours are sufficiently accurate to suggest that such information is no longer confidential, the Company shall disclose the Inside Information to the public as soon as possible.

When the Company or a person acting in its name or on its behalf discloses Inside Information to third parties, in the ordinary performance of their professional tasks or activities, the Company is obliged to make full or effective public disclosure of said Inside Information, at the same time in the case of intentional disclosure and promptly in the case of unintentional disclosure. This obligation shall not apply if the person receiving the Information is bound by an obligation of confidentiality, regardless of whether such obligation arises from statutory or regulatory provisions or from provisions contained in articles of association or a contract.

Finally, it should be noted that the delayed disclosure procedure may also apply with respect to events and circumstances concerning the Company’s Subsidiaries.

If the Issuer is in the process of trading in treasury shares under a buy-back programme pursuant to Article 5 of the MAR (the “**Buy Back Programme**”), following the decision to delay disclosure of the Inside Information, the Person Responsible for Relevant and Inside Information shall notify the function responsible for trading treasury shares that the conditions allowing to trade with the benefit of the exemption provided for by the MAR no longer apply (cf. article 4(1)(c) of Delegated Regulation (EU) 2016/1052), unless the conditions for taking the Buy Back Programme forward referred to in Article 4(2) of the aforementioned Delegated Regulation are met. If the Issuer puts the Buy Back Programme in progress on hold, the Person Responsible for Relevant and Inside Information shall inform the function responsible for the trading of treasury shares that the conditions for resuming operations have been restored, thanks to the exemption provided for by the MAR.

Throughout the delayed disclosure procedure, the Issuer shall not issue any public information that is inconsistent with the information whose disclosure was delayed.

## **12. Rumors**

The Person Responsible for Relevant and Inside Information, with the aid of the Investor Relator, with the aim of ensuring that the information disclosed to the public is accurate and consistent, where news are circulated in the public domain not in accordance with the rules provided for by the Procedure concerning the Company's equity, economic or financial situation as well as its extraordinary financial transactions (and, where relevant, those of Subsidiaries) or the trend of their business (so-called rumours), may consider issuing a specific press release aimed at restoring the accuracy of information to the public and preventing the latter from being misled.

## **13. Breach of the prohibition to disclose Inside Information**

The breach of the obligations laid down in this Procedure, even where not resulting in a behaviour directly sanctioned by the judicial authority, represents a serious damage for the Company, also in terms of reputation, with serious consequences on an economic and financial level. Any such breach also entails the possibility for the Company to claim compensation from the person responsible for the damages suffered by the Company and the Group.

If the breach is committed by a Director, he or she may not take part in resolving on the sanctions. If the majority of the members of the Board of Directors took part in the breach, the Board of Statutory Auditors shall take the appropriate measures.

If committed by other Relevant Persons (other than Directors and Statutory Auditors) and Employees, the breach of the obligations set out in the Procedure may constitute a disciplinary offence for the persons required to apply it and, in the most serious cases, may result in dismissal, also exposing the person who committed the breach to the risk of criminal and administrative sanctions.

Should the Company be sanctioned for breach of the provisions on corporate information disclosure resulting from non-compliance with the principles laid down in the Procedure, the Board of Directors shall exercise its right of recourse against the persons responsible for such breaches to obtain reimbursement of the amounts paid by way of sanctions, without prejudice to any further claim for compensation, including over reputation damages.

The Board of Directors, on the Person Responsible for Relevant and Inside Information's suggestion, shall take the measures provided for in the employment contract regulations (relating to the respective managers and employees), as well as the provisions of the Civil Code, against those responsible for breaches of the provisions defined above.

In addition, insider dealing and market manipulation are offences punishable by criminal and administrative sanctions against the persons responsible for such conducts and may give rise to situations entailing the company's administrative liability under Legislative Decree no. 231/01 as subsequently supplemented and amended.

Lastly, it should be noted that insider dealing and market manipulation constitute offences punishable by way of criminal sanctions (Articles 184, 185 et seq. TUF) and administrative sanctions (Articles 187-*bis*, 187-*ter* et seq. TUF) against those who have committed such offences. Annex B (“**Annex B**”) contains a summary description of the sanctions provided for by the TUF, as subsequently amended and supplemented, and by applicable legislation for the offences of (i) insider dealing and (ii) market manipulation.

## 14. Sondaggi di mercato Market soundings

The disclosure of information for the purpose of carrying out market soundings, as well as the possible receipt of information in the context of such market soundings, shall be managed by the Company, directly and/or - where applicable - through third parties, in accordance with and in compliance with the regulations in force.

## 15. Insider List

### 15.1. List

In accordance with the provisions of Article 18 of the MAR, the Company shall draw up and maintain a list of all persons within the Company or any Subsidiaries or parent companies (if any) who have access to Inside Information (the “**List**”).

The European Regulation (EU) 2026/1291 of 12 June 2026 (“**Regulation 1291**”), which implements the provisions of MAR, sets out implementing technical standards as to the precise format of the List sections and the updating thereof.

Any persons who (i) have access on a regular or occasional basis to Inside Information, when (ii) such access occurs by reason of their job or professional duties or by reason of the activities performed on behalf of the person required to keep the List, must be entered in the List.

With regard to requirement (i) above, it should be noted that a person’s access to Inside Information is the fact that gives rise to the obligation to enter the relevant person in the List and which makes such entry lawful, even if access takes place merely occasionally.

In accordance with the provisions of the MAR and Regulation 1291, the List shall be in electronic format, drawn up according to the template provided by Regulation 1291 (“**Annex A**”), and is structured in two separate sections: i) a section for each piece of Inside Information, in which a new section is added each time a new piece of Inside Information is identified (the “**occasional insiders section**”); ii) an additional section in which the data of persons who have access to all Inside Information on a permanent basis are reported (the “**permanent insiders section**”). The List sections shall be drawn up on the basis of Template 1 and Template 2 of Annex I to Implementing Regulation (EU) 2026/1291 which are reproduced in Annex A to this procedure.

The List consists of a system accessible via Internet/Intranet that is protected by appropriate security systems and access filters and credentials.

The List must ensure:

- I. the confidentiality of the information contained therein by ensuring that access to the list is limited to Relevant Persons or any other person acting on their behalf who must have access to it due to the nature of their respective function or position within the Company;
- II. that the information included is accurate and kept up to date;
- III. access and recovery of previous versions of the list.

The List shall be unique for the Group and shall be kept by the Investor Relator or the person identified as responsible for it, with the aid of the competent functions within the Company (the “**List Manager**”) in compliance with the provisions of Annex I of Regulation 1291. In addition to the responsibilities laid down in this Article, the List Manager shall be responsible for setting the criteria and procedures for the maintenance, management and search of the information contained in the List, so as to ensure easy access, management, consultation, recovery of information and printing.

In accordance with Article 18(2) of the MAR, if another person, acting in the name of or on behalf of the Company, takes on the task of drawing up and updating the List, the Company shall remain fully liable for the obligations under this Article. The Company shall always retain the right of access to the List.

At the CONSOB’s request, the List shall be transmitted to it as soon as possible via the electronic means specified on its website.

The Board of Directors (or the person(s) delegated by it), shall identify, for the purposes of filling the List “permanent insiders section”, the persons who, by virtue of their working or professional activities or functions performed, have access to Inside Information on a regular basis, and the basis for adding them onto the List. The data of those registered in the “permanent insiders section” are not included in the “occasional insiders sections”.

The Person Responsible for Relevant and Inside Information shall be responsible for identifying the persons to be added onto the List “occasional insiders sections”. To this end, the Person Responsible for Relevant and Inside Information shall rely on the Investor Relator.

If the Company decides not to delay the disclosure of Inside Information, the persons who had access to the inside information during the period between the moment when the information was classified as inside information and the moment when the information was published shall be indicated in the List. This timeframe should be as short as possible and limited to the technical time required to draw up the press release.

Immediately after a person has been added on the List, the Person Responsible for Relevant and Inside Information shall inform the person in writing of: (i) the entry of their names in the List; and (ii) the information on the processing of personal data.

The List Manager is also responsible for keeping the List up to date. Article 18(4) of the MAR specifies that the List shall be updated without delay, including by adding the date of the update, in the following circumstances:

- (a) where there is a change in the reason for including a person already on the insider list, including where the person's reference shall be moved from one section of the List to another;
- (b) where there is a new person who needs to be added to the insider list as they have access to Inside Information;
- (c) where a person ceases to have access to Inside Information (in the "permanent insiders section" or in the "occasional insiders sections").

The List shall also be updated, for each person included in it, in relation to his/her access to the various progressive stages of "development" of the set of circumstances or relevant event giving rise to Inside Information. The update shall indicate the date and time when the change occurred which made the update necessary.

Updating shall be arranged by the Company's Person Responsible for Relevant and Inside Information who, to this end, shall rely on the Investor Relator, in accordance with the relevant regulations, on the basis of reports promptly sent by persons who have access to Inside Information.

The List Manager shall also notify the Relevant Persons who were previously added to the List of any updates concerning them, including cancellation from the List, in the same manner as indicated above.

All notices relating to (i) entry in the List, together with a copy of this Procedure, (ii) cancellation from the List, (iii) updates to the information contained therein, as well as the obligations deriving from having access to Inside Information and the sanctions applicable in relation to insider dealing and unlawful disclosure of Inside Information, shall be issued in accordance with the templates in Annex C to this Procedure (the "**Annex C**").

The Company, or the person acting in its name and on its behalf, shall take all reasonable steps, in a timely manner, to ensure that any person on the List acknowledges in writing or by registered mail or by hand or by replying by email, at the time of their entry in the List:

- a) their entry in, cancellation from, and updating of the information contained in the List;
- b) the duties deriving from having access to Inside Information and the sanctions laid down in the event of breach of such duties or in the event of unauthorised disclosure of Inside Information.

To this end, each person on the List must - on receipt of the first notice and any subsequent notices relating to updates of the relevant legal duties and applicable sanctions and/or of this Procedure - reply by email (to the address indicated in the communication received), stating that he/she has taken note of this Procedure and of the legal and regulatory duties deriving from access to Inside Information, and that he/she is aware of the sanctions applicable in relation to insider dealing and unlawful disclosure of Inside Information.

The List Manager shall keep a copy of the communications sent on a durable medium to ensure proof and traceability in relation to the information obligations having been fulfilled.

The List Manager shall provide to the Relevant Persons, upon request, a hard copy of the information relating to them that is contained in the Register.

The List Manager is responsible for updating the Procedure in the light of developments in the legislation on the List and other regulatory provisions applicable from time to time, as well as the relevant experience gained, and for submitting proposals to the Managing Director for amendments and/or additions to the Procedure that he/she considers necessary or appropriate.

The List Manager shall promptly notify the Relevant Persons in writing of any amendments and/or additions to the Procedure and obtain their acceptance of the new contents of the Procedure in the form and manner specified in this Article.

Data relating to persons added on the List shall be kept for 5 (five) years after the circumstances which led to their entry on the List or updating cease to exist.

## **15.2. Relevant Information List (RIL)**

The Company may also draw up a list of persons who have access to Relevant Information (the “**Relevant Information List**”).

The Relevant Information List shall be set up to ensure that any persons who have had access to Relevant Information may be identified. Therefore, this Relevant Information List shall remain in force until the information (i) becomes Inside Information and, therefore, is disclosed to the market, or (ii) despite becoming Inside Information, is subject to a delayed disclosure procedure under Article 11 above.

The List Manager shall also be responsible for properly keeping the Relevant Information List. In particular, the Person Responsible for Relevant and Inside Information shall identify any Relevant Information, by adding it onto the Relevant Information List and noting the persons who have become aware of it throughout the development of the Relevant Information. The Relevant Information List shall include the same information as required for the List and shall be drawn up and maintained according to similar principles to those laid down for the List.

The List Manager shall promptly notify the person on the Relevant Information List in accordance with the template provided in Annex D to this Procedure (“**Annex D**”) specifying: (i) entry on the Relevant Information List, together with a copy of this Procedure, (ii) cancellation from the same, (iii) any updates to the information contained therein, as well as of the confidentiality obligations arising from having access to Relevant Information. Each Person shall, upon receipt of the first notice and any subsequent notices of updates to the confidentiality obligations and/or this Procedure, reply by email (at the address indicated in the notice received), stating that he or she has read and understood this Procedure and the confidentiality obligations set out herein.

## **16. Trattamento dei Dati Personali Processing of Personal Data**

For the purposes of this Procedure, the Company may be required to process certain personal data of Relevant Persons. All data relating to Relevant Persons are processed in compliance

with the rules adopted by the Company on the protection of personal data and in accordance with applicable legislation. Relevant Persons shall therefore be made aware of the following:

a) the purposes of the data processing and the methods of processing to which the data will be subject;

(b) the mandatory nature of the provision of data;

(c) the entities or categories of entities to whom or which the data may be disclosed and the scope of dissemination of the data;

(d) the rights set out in EU Regulation 2016/679;

(e) the name and last name, the name or company name and the domicile, residence and registered office of the Insider;

f) Controller: Technoprobe S.p.A.

## **17. Modificazioni e integrazioni Amendments and supplements**

The provisions of this Procedure shall be updated and/or supplemented by the Issuer's Board of Directors, taking into account the provisions of law or regulations that are in any case applicable, as well as the application experience and market practice that will be developed on the subject.

If it is necessary to update and/or supplement individual provisions of the Procedure as a result of amendments in the applicable laws or regulations or specific requests from supervisory authorities, as well as in cases of proven urgency, this Procedure may be amended and/or supplemented by the Chairperson of the Board of Directors or the Managing Director with subsequent ratification of the amendments and/or additions by the Board of Directors at the first next meeting.

### **ANNEXES:**

Annex A: Annex I of EU Regulation No 2026/1291

Annex B: Legislation extracts

Annex C: Notices relating to the List

Annex D: Notices relating to the Relevant Information List

Annex E: Letter to Subsidiaries relating to information disclosure

# Annex A

## Annex I to Implementing Regulation (EU) 2026/1291

### TEMPLATE 1

#### Template for the Insider Lists referred to in Article 1(1) and Article 2(2), first subparagraph

**Description of the specific piece of inside information to which this section relates to:**

**Date and time of creation of this section** (*i.e. when the specific inside information was identified*): [yyyy-mm-dd; hh:mm UTC (Coordinated Universal Time)]

**Date and time of the last update of this section:** [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

**Date of transmission to the competent authority:** [yyyy-mm-dd]

<b>First name(s)</b> of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provider)	<b>Surname(s)</b> of insider (in the case of third-party service providers, the surname(s) of the natural person acting as a contact person for that third-party service provider)	<b>Professional telephone number(s)</b> (work direct telephone line and work mobile numbers)	<b>Function and reason for being insider</b>	<b>Obtained</b> (the date and time at which the insider obtained access to the specific piece of inside information)	<b>Ceased</b> (the date and time at which the insider ceased to have access to the specific piece of inside information)	<b>National Identification Number</b> (if applicable) or otherwise Date of Birth
[text]	[text]	[numbers (no space)]	[Text describing role, function and reason for being on this list including the company name and address in the case of third-party service providers]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[number and/or text or yyyy-mm-dd for the date of birth]

## TEMPLATE 2

### Template for the permanent insiders section of insider lists referred to in Article 1(2) and Article 2(2), second

**Date and time of creation of the permanent insider's section:** [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

**Date and time of the last update of the permanent insider's section:** [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

**Date of transmission to the competent authority:** [yyyy-mm-dd]

<b>First name(s)</b> of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provider)	<b>Surname(s)</b> of insider (in the case of third-party service providers, the surname(s) of the natural person acting as a contact person for that third-party service provider)	<b>Professional telephone number(s)</b> (work direct telephone line and work mobile numbers)	<b>Function and reason for being insider</b>	Obtained (the date and time when the insider obtained access to all inside information at all times)	<b>Ceased</b> (the date and time when the insider ceased to have access to all inside information at all times)	<b>National Identification Number</b> (if applicable) or otherwise Date of Birth
[text]	[text]	[numbers (no space)]	[Text describing role, function and reason for being on this section, including the company name and address in the case of third-party service providers]]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[number and/or text or yyyy-mm-dd for the date of birth]

## **Annex B – LEGISLATION EXTRACTS**

The following is a brief summary description of the sanctions provided for by the TUF and by applicable legislation for the offences of (i) insider dealing and (ii) market manipulation.

### **Article 184 - (Insider dealing or unlawful disclosure of inside information. Recommending or inducing others to commit insider dealing)**

1. Imprisonment between one and six years and a fine between twenty thousand and three million euro shall be imposed on any person who, while possessing inside information by virtue of his/her membership to the administrative, management or supervisory bodies of an issuer, his/her holding in the issuer's capital or the performance of his/her job, profession, duties, including public duties, or position:

a) purchases, sells or carries out other transactions involving, directly or indirectly, for his/her own account or for the account of a third party, financial instruments using such information;

b) discloses such information to others outside the regular performance of his/her job, profession, duties or position or a market sounding conducted in accordance with Article 11 of Regulation (EU) no. 596/2014 of the European Parliament and of the Council, of 16 April 2014;

(c) recommends or induces others, on the basis of such information, to carry out any of the transactions referred to in letter (a).

2. The same punishment referred to in paragraph 1 above shall apply to any person who, being in possession of inside information by reason of preparing or performing criminal activities, engages in any of the conducts referred to in the same paragraph 1.

3. Aside from instances of participation in the offences referred to in paragraphs 1 and 2, any person who, being in possession of inside information for reasons other than those referred to in paragraphs 1 and 2 and being aware of the inside nature of such information, engages in any of the conducts referred to in paragraph 1 shall be punished with imprisonment from one year and six months to ten years and with a fine between twenty thousand and two million euro.

4. In the cases referred to in paragraphs 1, 2 and 3 above, fines may be increased up to three times or up to the greater amount of ten times the proceeds or profit gained from the offence where, due to the seriousness of the offence, the offender's personal characteristics or the size of the proceeds or profit gained from the offence, the fine is considered to be inadequate even in its maximum amount.

5. The provisions of this Article shall also apply where the facts referred to in paragraphs 1, 2 and 3 above involve conduct or transactions, including bids, relating to the auctioning on an auction platform authorised as a regulated market of emission allowances or other auctioned products based thereon, including when auctioned products are not financial instruments, pursuant to Commission Regulation (EU) No 1031/2010 of 12 November 2010.

### **Article 185 - Market Manipulation**

1. Any person who spreads false news or carries out fictitious transactions or other artifices which are likely to cause a significant alteration in the price of financial instruments, shall be punished by imprisonment ranging from two to twelve years and by a fine ranging from twenty thousand to five million

euro. The penalty shall be imprisonment from two to seven years and a fine from EUR 25,000 to EUR 6,000,000 where the offence is committed by means of the use of artificial intelligence systems.

1-bis. Any person who has committed the action above by means of orders to trade or transactions carried out for legitimate reasons and in accordance with accepted market practices, within the meaning of Article 13 of Regulation (EU) No 596/2014, shall not be punishable.

2. Courts may increase the fine up to three times or up to the larger amount of ten times the proceeds of the crime or the profit gained therefrom when, in view of the particular seriousness of the offence, the offender's personal characteristics or the size of the proceeds or profit gained from the offence, the fine is considered to be inadequate even in its maximum amount.

#### **Article 186 - Accessory sanctions**

1. Conviction for any of the offences referred to in this chapter shall entail the application of the accessory sanctions referred to in Articles 28, 30, 32-bis and 32-ter of the Italian Criminal Code for a period of no less than six months and no more than two years, as well as the publication of the judgement in at least two daily newspapers being circulated on a national basis of which one shall be a financial newspaper.

#### **Article 187 - Confiscation**

1. Conviction for any of the offences referred to in this Chapter entails that confiscation of the assets constituting the profit thereof shall always be ordered.

2. If it is not possible to carry out the confiscation in accordance with paragraph 1, a sum of money or property of equivalent value may be confiscated instead.

3. The provisions of Article 240 of the Italian Criminal Code shall equally apply to any matter not covered by paragraphs 1 and 2 above.

#### **Article 187-bis - Insider dealing or unlawful disclosure of inside information.**

1. Without prejudice to the sanctions applicable where the conduct constitutes a criminal offence, an administrative fine ranging between twenty thousand euro and five million euro shall be imposed on any person who violates the prohibition of insider dealing and unlawful disclosure of inside information, as per Article 14 of Regulation (EU) no. 596/2014.

5. The administrative fines referred to in this Article shall be increased up to three times or, where larger, ten times the profit gained or the losses avoided thanks to the unlawful conduct where, having taken account of the criteria listed in Article 194-bis and the size of the product or the profit from the unlawful conduct, the pecuniary sanctions appear to be inadequate even in their maximum amounts.

6. For the cases referred to in this Article, attempted violations shall be treated as completed violations.

#### **Article 187-ter - Market manipulation**

1. Without prejudice to the sanctions applicable where the conduct constitutes a criminal offence, an administrative fine ranging between twenty thousand euro and five million euro shall be imposed on any person who violates the prohibition of market manipulation, as per Article 15 of Regulation (EU) no. 596/2014.

2. Article 187-bis, paragraph 5, shall apply.

4. No administrative sanction under this Article may be imposed on a person who proves that he/she acted on the basis of legitimate reasons and in compliance with accepted market practices in the market concerned.

**Article 187-ter.1 - Sanctions relating to violations of the provisions of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014**

1. If the obligations provided for in Article 16 (1) and (2), Article 17 (1), (2), (4), (5) and (8) of Regulation (EU) no. 596/2014, in the delegated acts and the relevant regulatory and implementing technical standards, as well as Article 114, paragraph 3, of this decree are infringed in the context of an entity or a company, an administrative fine ranging between five thousand euros and two million five hundred thousand euros shall apply, or two per cent of the entity or company's turnover, where this amount is higher than two million five hundred thousand euro and the turnover may be determined in accordance with Article 195, paragraph 1-bis.

2. If the violations referred to in paragraph 1 above are committed by a natural person, an administrative fine ranging from five thousand to one million euro shall be imposed on such person.

3. Without prejudice to the provisions of paragraph 1 above, the sanction referred to in paragraph 2 shall apply to the company representatives and personnel of the company or the body which is responsible for the infringement, in the cases provided for in Article 190-bis, paragraph 1, letter a).

4. A fine ranging from five thousand to one million euro shall be imposed on an entity or a company where any of the obligations laid down in Article 18(1) to (6), Article 19(1), (2), (3), (5), (6), (7) and (11) and Article 20(1) of Regulation (EU) No 596/2014, the delegated acts and the relevant regulatory and implementing technical standards are infringed.

5. If the violations referred to in paragraph 4 above are committed by a natural person, an administrative fine ranging from five thousand to five hundred thousand euro shall be imposed on such person.

6. Without prejudice to the provisions of paragraph 4 above, the sanction referred to in paragraph 5 shall apply to the company representatives and personnel of the company or the body which is responsible for the infringement, in the cases provided for in Article 190-bis, paragraph 1, letter a).

7. If the profit gained by the offender as a result of the infringement is higher than the sanction's maximum limits referred to in this article, the fine shall be raised up to three times the amount of the profit gained, provided that this amount may be determined.

8. Consob may apply one or more of the administrative measures provided for in Article 30(2)(a) to (g) of Regulation (EU) No 596/2014, including in addition to the administrative pecuniary sanctions provided for in this Article.

9. Where the violations are of a low offensive or dangerous nature, Consob may apply one of the following administrative measures as opposed to the pecuniary sanctions envisaged in this Article, without prejudice to the right to order confiscation as per Article 187-sexies:

(a) an order to cease the contested violations, with an indication, where appropriate, of the measures to be taken and the time limit for compliance, and to refrain from repeating them;

(b) a public statement concerning the infringement committed and the person responsible for it, where the contested violation has ceased.

10. Failure to comply with the obligations set out in the measures referred to in Article 30(2) of Regulation (EU) No 596/2014, within the prescribed time limit, shall result in an increase of up to one third of the administrative fine imposed or in the application of the administrative fine provided for the originally contested infringement increased by up to one third.

11. Articles 6, 10, 11 and 16 of Law 689 of 24 November 1981 shall not apply to the administrative fines provided for in this Article.

#### **Article 187-quater - Ancillary administrative sanctions**

1. The application of the administrative fines provided for by Articles 187-bis and 187-ter entails:

a) the temporary disqualification from administrative, management or supervisory functions within entities authorised in accordance with this decree, Legislative Decree No. 385 of 1 September 1993, Legislative Decree No. 209 of 7 September 2005 or within pension funds;

(b) temporary disqualification from carrying out administrative, management or supervisory functions of listed companies and companies belonging to the same group of listed companies;

c) in accordance with Article 26, paragraphs 1, letter d) and 1-bis of Legislative Decree No. 39 of 27 January 2010, suspension from the Register of independent auditors, auditing firms or persons in charge;

d) suspension from the register referred to in Article 31, paragraph 4 for financial advisors qualified to practise door-to-door selling;

e) the temporary loss of the requirements of integrity for the shareholders in the entities indicated in letter a).

1-bis. Without prejudice to the provisions of paragraph 1, with the measure applying the administrative fines provided for by Article 187-ter.1, Consob may apply the accessory administrative sanctions under paragraph 1, letters a) and b).

2. The accessory administrative sanctions referred to in paragraphs 1 and 1-bis shall have a duration of no less than two months and no more than three years.

2-bis. Where the offender has already committed one of the offences provided for in Chapter II, or an infringement of the provisions of Articles 187-bis and 187-ter with intent or through gross negligence, twice or more in the last ten years, an accessory administrative sanction shall be applied entailing the offender's permanent disqualification from any administrative, managerial or supervisory functions within the entities indicated in paragraph 1, letters a) and b), in the case that the same person has already been disqualified for a total period of at least five years.

3. In the measure imposing the administrative fines referred to in this chapter, CONSOB, taking into account the seriousness of the infringement and the degree of fault involved, may order authorised intermediaries, market operators, listed issuers and auditing firms not to rely, in the exercise of their activities and for a period up to three years, on the services of the offender, and to request the competent professional associations to temporarily suspend the person registered with the association from exercising his/her professional activity, as well as to apply him/her a temporary disqualification from carrying out transactions, or from acting as a direct counterparty in placing orders to buy or sell financial instruments, for a period up to three years.

#### **Article 187-quinquies - Liability of the entity**

1. Entities shall be punished with an administrative fine ranging between twenty thousand euro and fifteen million euro, or up to fifteen percent of their turnover when this amount is higher than fifteen million euro, and the turnover may be determined in accordance with Article 195, paragraph 1-bis, where an infringement of the prohibition under Article 14 or of the prohibition under Article 15 of Regulation (EU) no. 596/2014 is committed in their interest or to their advantage:

a) by persons performing representative, administrative or management functions in the entity or one of its organisational units having financial and functional autonomy and by persons who, de facto or otherwise, manage and control the entity.

b) by persons subject to the direction or supervision of a person referred to in paragraph a) above.

2. If, following the commission of the offences referred to in paragraph 1, the product thereof or the profit therefrom accruing to the entity is very large, the fine shall be increased up to ten times such product or profit.

3. Entities shall not be liable if they demonstrate that the persons specified in paragraph 1 acted exclusively in their own interest or in the interest of third parties.

4. Articles 6, 7, 8 and 12 of Legislative Decree 231 of 8 June 2001 shall apply, insofar as they are compatible, to offences referred to in paragraph 1. The Ministry of Justice, after consulting Consob, shall formulate the observations referred to in Article 6 of Legislative Decree 231 of 8 June 2001 with regard to offences referred to in this chapter.

#### **Article 187-sexies - Confiscation**

1. The imposition of the administrative fines referred to in this chapter shall entail the confiscation of the product or profits of the offence.

2. If it is not possible to carry out the confiscation in accordance with paragraph 1, a sum of money or property of equivalent value may be confiscated instead.

3. In no case may property not belonging to one of the persons on whom the administrative fine was imposed be confiscated.

#### **Article 187-septies - Procedure for imposing sanctions**

1. The administrative sanctions provided for in this chapter shall be applied by Consob by means of a reasoned decision, upon notifying the relevant charges to the persons concerned, within 180 days from the findings relating to the infringement or within 360 days if the person concerned resides or has its registered office abroad. The persons concerned may, within 30 days of receiving the notice relating to the allegations raised against them, submit their observations and request a personal hearing during the preliminary investigation, which they may also attend with the assistance of a lawyer.

2. The procedure for imposing sanctions is governed by the principles of adversarial debate, access to and knowledge of the investigation measures, recording of minutes and the separation between investigative and decisional functions.

4. An appeal against the measure imposing the sanction may be lodged with the court of appeal in whose district the appellant's registered office or residence is located. If the appellant does not have its registered office or residence within the State, the court of appeal of the place where the infringement was committed shall have jurisdiction. Where these criteria are not applicable, the Rome Court of Appeal shall have jurisdiction. The appeal shall be served, on penalty of forfeiture, to the authority that

issued the measure within thirty days of notification of the contested measure, or sixty days if the appellant resides abroad, and shall be filed with the Registry, together with the documents submitted with the appeal, within a mandatory period of thirty days from notification.

5. The lodging of the appeal shall not suspend the enforceability of the measure. The court of appeal may, on the basis of serious grounds, order the suspension of the measure by a non-appealable order.

6. The Presiding Judge of the Court of Appeal shall appoint the reporting judge and shall schedule the public hearing for the appeal discussion by order. This order shall be notified to the parties by the Registry at least 60 days prior to the hearing. The Authority shall file its briefs and supporting documents within ten days prior to the hearing. If the appellant fails to appear at the first hearing without any legitimate impediment, the judge shall declare the appeal as inadmissible by means of an order that may be appealed to the Italian Supreme Court, and the appellant shall bear the costs of the proceedings.

6-bis. At the hearing, the court of appeal shall order, including ex officio, the acquisition of the evidence that it deems necessary, and shall open the personal hearing of the parties who have requested it. The parties then proceed to hold the discussion and present their oral arguments on the case. The decision shall be filed with the Registry within 60 days. Where at least one of the parties expresses an interest in the publication of the operative part of the decision in advance of the whole text of the decision, the operative part shall be published by filing it with the Registry no later than seven days after the hearing.

6-ter. In its decision, the court of appeal may either dismiss the appeal, and charge the costs of the proceedings to the appellant, or uphold it, thereby vacating all or part of the measure or reducing the amount or duration of the sanction.

7. A copy of the decision shall be provided by the registry of the Court of Appeal to the authority that issued the measure, also for the purpose of publication as provided for in Article 195-bis.

8. Article 16 of Law No 689 of 24 November 1981 shall not apply to the administrative fines provided for in this Chapter.



## ANNEX C - NOTICES RELATING TO THE LIST

### Template 1

#### Notification of entry in the List and information on the processing of personal data

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has set up a list of persons who have access to Inside Information as per Article 7 of the MAR Regulation (the “**List**”).

We hereby inform you, pursuant to Article 18(2) of the MAR Regulation, that your personal data have been included in the said List for the following reason [\_\_\_\_\_].

Please note that the holders of Inside Information pertaining to the Company shall comply with the provisions set forth under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com) - section “*Governance*”.

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply *by email* to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

\* \* \* \* \*

We hereby inform you that the personal data required for registration in the List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:

a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes;



- b) obtain without delay the rectification of inaccurate personal data concerning you;
- c) obtain, in the cases provided for, the erasure of your data;
- (d) obtain the restriction of processing or object to processing, where possible;
- e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, please contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com).

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and acknowledgement of the Procedure.

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## Template 2

### Updating of data entered in the List

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has set up a list of persons who have access to Inside Information as per Article 7 of the MAR Regulation (the “**List**”).

Further to the information we provided you with on [●] with regard to your inclusion in the List, we hereby inform you that following [●], the reason for your inclusion in the List has been updated.

Please note that the holders of Inside Information pertaining to the Company shall comply with the provisions set forth under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com)

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply *by email* to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

\* \* \* \* \*

We hereby inform you that the personal data required for registration in the List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:

- a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes;
- b) obtain without delay the rectification of inaccurate personal data concerning you;



c) obtain, in the cases provided for, the erasure of your data;

(d) obtain the restriction of processing or object to processing, where possible;

e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, please contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com).

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and acknowledgement of the Procedure.

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### Template 3

#### Cancellation from the List

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has set up a list of persons who have access to Inside Information as per Article 7 of the MAR Regulation (the “**List**”).

Further to the information we provided you with on [●] with regard to your inclusion in the List, we hereby inform you that on [●] the reason for your inclusion in the List ceased to exist.

We remind you that the holders of Inside Information pertaining to the Company, in order to disseminate it, shall comply with the provisions set forth under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com)

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply *by email* to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

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We hereby inform you that the personal data required for registration in the List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:

a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be disclosed, the applicable retention period, the existence of automated decision-making processes;

b) obtain without delay the rectification of inaccurate personal data concerning you;



c) obtain, in the cases provided for, the erasure of your data;

(d) obtain the restriction of processing or object to processing, where possible;

e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, please contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com).

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and acknowledgement of the Procedure.

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## ANNEX D - NOTICES RELATING TO THE RELEVANT INFORMATION LIST

### Template 1

#### Notification of entry in the Relevant Information List and information on the processing of personal data

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has set up a list of persons who have access to relevant information, as defined in the Procedure (the “**Relevant Information List**”).

We hereby inform you that your personal data have been included in said Relevant Information List for the following reason [●].

We remind you that for the holders of Relevant Information or Inside Information pertaining to the Company to disseminate them, they shall comply with the provisions under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com)

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply by email to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

\* \* \* \* \*

We hereby inform you that the personal data required for registration in the Relevant Information List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:



- a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes;
- b) obtain without delay the rectification of inaccurate personal data concerning you;
- c) obtain, in the cases provided for, the cancellation of your data;
- (d) obtain the restriction of processing or object to processing, where possible;
- e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, simply contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com).

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and confirmation of the Procedure.

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## Template 2

### Updating of data entered in the Relevant Information List

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has established a list of persons who have access to relevant information, as defined in the Procedure (the “**Relevant Information List**”).

Further to the information we provided you with on [●] with regard to your inclusion in the Relevant Information List, we hereby inform you that following [●], the reason for your inclusion in the Relevant Information List has been updated.

We remind you that the holders of Relevant Information or Inside Information pertaining to the Company, in order to disseminate it, shall comply with the provisions set forth under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com)

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply by email to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

\* \* \* \* \*

We hereby inform you that the personal data required for registration in the Relevant Information List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:

a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes;



- b) obtain without delay the rectification of inaccurate personal data concerning you;
- c) obtain, in the cases provided for, the cancellation of your data;
- (d) obtain the restriction of processing or object to processing, where possible;
- e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, simply contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com)

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and confirmation of the Procedure.

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## Template 3

### Cancellation from the Relevant Information List

The undersigned Technoprobe S.p.A. (“**Company**” or “**Controller**”), in compliance with the provisions of the procedure for the internal management and public disclosure of Inside Information (the “**Procedure**”), has set up a list of persons who have access to relevant information, as defined in the Procedure (the “**Relevant Information List**”).

Further to the information we provided you with on [●] with regard to your inclusion in the Relevant Information List, we hereby inform you that on [●] the reason for your inclusion in the Relevant Information List ceased to exist.

We remind you that the holders of Relevant Information or Inside Information pertaining to the Company, in order to disclose it, shall comply with the provisions set forth under the annexed Procedure, which is also available at [www.technoprobe.com](http://www.technoprobe.com)

If you have any questions, please contact the Company’s Investor Relator, as indicated from time to time on the Company’s website, in the Investor Relation section.

Please send a copy of this notice, signed for confirmation and acceptance, by email to the address indicated in the notice received or reply by email to the address indicated in the notice received confirming that you have received and read and that you accept this notice.

\* \* \* \* \*

We hereby inform you that the personal data required for registration in the Relevant Information List and for the relevant updates will be processed and stored by the Company, with the aid of computerised means, in accordance with the provisions of the Privacy Regulations (namely the national privacy laws, European Regulation No. 2016/679 - GDPR - on the protection of individuals with regard to the processing of personal data, as well as the free movement of such data and repealing Directive No. 95/46/EC and the Measures of the Italian Data Protection Authority), in order to fulfil the obligations deriving from the laws in force on market abuse and the processing of Inside Information and for the period required under the aforementioned laws. We hereby inform you that such data processing is necessary to fulfil a legal obligation to which the Data Controller is subject in accordance with Article 6, paragraph 1, letter c), of the GDPR. Disclosure of the requested personal data is therefore mandatory; the data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, which will act as Data Controllers or Processors, in the latter case subject to prior appointment. Failure to provide such information could expose you and/or Technoprobe S.p.A. to possible penalties under the laws in force and/or the Procedure.

Finally, we inform you that the relevant Data Controller is Technoprobe S.p.A., with registered office at Via Cavalieri di Vittorio Veneto, 2, 23870 Cernusco Lombardone (LC).

We inform you that you may at any time exercise the rights granted to you by the applicable laws, including:

a) access your personal data, obtaining evidence of the purposes pursued by the Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes;



- b) obtain without delay the rectification of inaccurate personal data concerning you;
- c) obtain, in the cases provided for, the cancellation of your data;
- (d) obtain the restriction of processing or object to processing, where possible;
- e) request the portability of the data that you have provided to the Controller, namely receive them in a structured, commonly used and machine-readable format, including for the purpose of transmitting such data to another controller, without any hindrance from the Controller.

You may also lodge a complaint with the Data Protection Authority in accordance with Article 77 of the GDPR.

To exercise these rights, simply contact the Controller by writing to the following e-mail address: [privacy@technoprobe.com](mailto:privacy@technoprobe.com).

The List Manager.

\*\*\*

I, the undersigned, declare that I am aware of the obligations under EU and national provisions applicable from time to time to the processing of Relevant Information and Inside Information and that I have received adequate information, as well as a complete copy of the Company's Procedure and that I accept its content, undertaking to comply with its provisions.

For acceptance and confirmation of the Procedure.

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## ANNEX E

[ON COMPANY LETTERHEAD]

To

[COMPANY]

[ADDRESS]

Kind attention:

Managing Director

[Place], [Date]

**Subject: PROCEDURE FOR THE INTERNAL MANAGEMENT AND PUBLIC DISCLOSURE OF INSIDE INFORMATION**

Dear Sirs,

on 24 June 2026, our Company updated the procedure relating to the management and disclosure of inside information (the “**Procedure**”) approved by the Board of Directors on 31 October 2022 with equal effectiveness. Please note that capitalised terms in this document shall have the same meaning as the same terms used in the Procedure.

In this regard, we are formally sending you copy of the Procedure, so that you can understand the provisions that apply to your company.

In any case, we remind you that your company shall:

1. adopt appropriate provisions to ensure compliance with the obligations set forth in this Procedure;
2. send any information that may be useful to identify Confidential Information, Relevant Information and Inside Information and for keeping the List and the Relevant Information List, to the Head of the Company and to the List Manager, as indicated in the Procedure.

It shall be the responsibility of your company to assess whether information that may become Inside Information is being prepared by your company, and to immediately inform the Processor and the List Manager, who is also responsible for keeping the Relevant Information List.

Please do not hesitate to contact us should you need any clarification.

Kind regards.

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**Technoprobe S.p.A.**