



Internal Dealing Procedure



Internal Dealing Procedure

**in accordance with the provisions of Article 19 of the MAR,
Delegated Regulation No. 2016/522 and Implementing
Regulation 2016/523,**

Traditional administrative and control model

Issuer: Technoprobe S.p.A.

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

Website

**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

Introduction

This procedure on Internal Dealing (the “**Procedure**”) has been adopted by the Board of Directors of Technoprobe S.p.A. (the “**Company**” or the “**Issuer**”) in accordance with the provisions of Article 19 of the MAR, Delegated Regulation No. 2016/522, Implementing Regulation 2016/523, as well as from the provisions of the TUF applicable from time to time and of the Issuers’ Regulation (all regulatory references as defined below) in order to regulate the information flows relating to transactions carried out - also through third parties - by Internal Dealing Persons (as defined below) concerning the Company’s Financial Instruments, Derivative Financial Instruments, Related Financial Instruments or Financial Instruments and Related Financial Instruments.

Any amendments and/or additions to this Procedure shall enter into force on the date of publication of the Procedure on the Company’s website or, where such amendments concern statutory or regulatory provisions of an immediately binding nature, on such different date as may be provided for by applicable laws or regulations.

For all matters not explicitly provided for in this Procedure, reference is expressly made to the provisions on the dissemination of price-sensitive information, the so-called Internal Dealing notice and corporate information provided for under the MAR, the TUF and the laws and regulations (including European) applicable *pro tempore* (the “**Internal Dealing Rules**”).

1. Definitions

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

Shares: means the ordinary shares of the Company.

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

Board of Directors: means the board of directors of the Company, in office from time to time.

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

Date of Performance: means, by way of example, the day on which:

- i) the contract for the purchase, sale, exchange, even free of charge, or securities lending or repurchase under the MAR Relevant Transaction (as defined below) has been entered into;
- ii) the financial instruments, derivative financial instruments, and related financial instruments due as a result of the exercise of those, including unlisted ones, that grant the right to subscribe, purchase or sell shares, as well as the exercise of the option to convert convertible bonds, including cum warrants, have been allocated;
- iii) the financial instruments, of derivative financial instruments, of related financial instruments following the performance of capital transactions have been allocated.

ESMA: means the European Securities and Markets Authority.

Group: means the Company and its Subsidiaries.

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

MAR: means the Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) as subsequently amended and supplemented;

MAR Relevant Transaction: means the transactions indicated under Annex C to this procedure and carried out by MAR Relevant Persons concerning Financial Instruments of the Company, derivative instruments or Related Financial Instruments.

MAR Relevant Persons or Internal Dealing Persons: means, jointly, the MAR Relevant Persons and the Persons Closely Associated with the MAR Relevant Persons.

Person Closely Associated with the MAR Relevant Persons: means

- a) a spouse or a partner treated as a spouse under national law;
- b) a child who is a dependant under national law;
- c) a relative who has shared the same dwelling for at least one year on the date of the Transaction in question;
- d) a legal person, trust or partnership, the managerial responsibilities of which are vested in a MAR Relevant Person or a person referred to under letters a), b) or c) above, or directly or indirectly controlled by that person or is incorporated for its benefit or whose economic interests are essentially equivalent to the interests of that person.

Delegated Regulation No. 2016/522: means the European Commission Delegated Regulation (EU) No. 2016/522 of 17 December 2015, which supplements the MAR with respect to, *inter alia*, reporting thresholds, the competent authority for delay notifications, permission to trade during closed periods and types of transactions entered into by persons exercising administrative, supervisory or managerial functions that are subject to notification.

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

Commission Implementing Regulation (EU) 2016/523: means the Commission Implementing Regulation (EU) 2016/523 of 10 March 2016.

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.

Person in Charge: has the meaning under Article 5 of this Procedure.

MAR Relevant Person: indicates a person carrying out administrative, control or management functions, meaning that:

- a) a member of the Company’s Board of Directors or Board of Statutory Auditors;
- b) a senior executive who, although not a member of the bodies referred to in letter a), has regular access to Inside Information¹ directly or indirectly concerning the Company and have the power to take management decisions that may affect the Company’s future development and prospects;

“Financial Instruments”: means financial instruments of the Company as defined under Article 4, section 1, point 15), of Directive 2014/65/EU that are: (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) financial instruments not indicated in the letters (a), (b) or (c) above, 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).

Related Financial Instruments: means the financial instruments qualified by Article 3, paragraph 2, letter b), MAR with reference to Financial Instruments issued by the Company.

TUF: Legislative Decree No. 58 of 24 February 1998, as subsequently amended and supplemented.

¹ In accordance with Article 7 of the MAR, “*inside information*” means any information of a precise nature which has not been made public and which relates directly or indirectly to the Company, its Subsidiaries or one or more Financial Instruments and which, if it were made public, would be likely to have a significant effect on the prices of those Financial Instruments. An information shall be deemed to be of a precise nature if: a) it refers to a set of circumstances which exist or may reasonably be expected to come into existence or to an event which has occurred or may reasonably be expected to occur; b) it is specific enough to enable a conclusion to be drawn as to the possible effect of the set of circumstances or event referred to in letter a) on the prices of Financial Instruments. In the case of a protracted process which is intended to bring about, or 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 circumstance or that future event, may be deemed to be precise information. Information which, if it were made public, would be likely to have a significant effect on the prices of financial instruments, derivative financial instruments, related spot commodity contracts, or auctioned products based on emission allowances shall mean information a reasonable investor would be likely to use as part of the basis of his or her investment decisions. An intermediate step in a protracted process shall be deemed to be inside information if, by itself, it satisfies the criteria of inside information as referred to herein.

2. Identification by the Company and Subsidiaries of Internal Dealing Persons

In order to comply with the provisions of this Procedure and in compliance with the obligations under Article 19, paragraph 5, of the MAR, the Company, through the Person in Charge, shall identify the Internal Dealing Persons based on the definitions set out in Article 1 of this Procedure and, again through the Person in Charge, shall inform the Internal Dealing Persons in writing of that identification and of their obligations under the law and this Procedure.

The Person in Charge shall inform the Board of Directors of the Company at the first useful meeting, in the event of changes in the relevant information following changes and/or interruptions in the relations with the Internal Dealing Persons concerned, of the list of the Company's persons qualified as Internal Dealing Persons.

The Person in Charge shall promptly notify in writing the MAR Relevant Persons of the identification and the related disclosure obligations provided for by the law and the Procedure.

MAR Relevant Persons shall promptly notify the Person in Charge in writing of the list of Persons Closely Associated with them and the relevant identification data, as well as any subsequent update of the names and data previously notified. MAR Relevant Persons shall inform the Persons Closely Associated with them in writing of their obligations under this Procedure, using, if necessary, the notification model under Annex E. A copy of said notice shall be stored by the same.

3. Scope of Application

The Procedure governs the information obligations of Internal Dealing Persons vis-à-vis the Company and the market, as well as the Company's obligations vis-à-vis the public, and is binding on Internal Dealing Persons even if they have not returned a copy of this Procedure signed in accordance with Article 12 below.

MAR Relevant Transactions carried out by Internal Dealing Persons are subject to disclosure.

Compliance with the provisions under this Procedure shall not, in any event, relieve Internal Dealing Persons from the obligation to comply with other applicable laws and regulations in force, such as, for example, those relating to disclosure requirements for significant shareholdings, those relating to market abuse and insider dealing, and any other applicable legislation.

4. Identification of MAR Relevant Transactions

For the purposes of this Procedure, MAR Relevant Persons are required to notify the Company and CONSOB in the manner and within the time limits specified in Article 6 below of all MAR Relevant Transactions.

The disclosure requirements set forth under this Procedure do not apply to the following MAR Relevant Transactions:

- MAR Relevant Transactions whose total amount does not reach EUR 50,000.00 (fifty thousand/00) by the end of the calendar year. It should be specified that the total amount shall be calculated by summing without compensation all the MAR Relevant Transactions carried out on behalf of each MAR Relevant Person. The disclosure obligation applies to all subsequent MAR Relevant Transactions once a total amount of EUR 50,000.00 (fifty thousand/00) has been reached within the

same calendar year. For Financial Instruments other than shares or bonds or for transactions without consideration, the value is calculated in accordance with ESMA guidelines;

- transactions relating to Financial Instruments Related to Shares or debt instruments of the Company if, at the time of the transaction, one of the following conditions is fulfilled:
 - a. the financial instrument is formed by a quota or a share of a collective investment undertakings where the exposure to the Company's Shares or debt instruments does not exceed 20% of the portfolio's assets;
 - b. the financial instrument provides exposure to a portfolio of assets where the exposure to the Company's Shares or debt instruments does not exceed 20% of the portfolio's assets;
 - c. the financial instrument is a quota or share in a collective investment undertakings or provides exposure to a portfolio of assets and the MAR Relevant Person does not know, nor could have known, the investment composition or exposure of such collective investment undertakings or portfolio of assets in relation to the Shares or debt instruments of the Company and furthermore there is no reason for such person to believe that the Shares or debt instruments of the Company exceed the thresholds set out in letter a) or b) above.

Where information relating to the composition of the collective investment undertaking's investments or exposure to the portfolio of assets is available, the MAR Relevant Person shall use all reasonable endeavours to use of that information.

5. Person in charge

The Company's Investor Relator is the Person in Charge of receiving, managing and disclosing to the public information relating to MAR Relevant Transactions. The Person in Charge may delegate from time to time one or more persons who, in case of his or her absence or impediment, shall be responsible for carrying out the requirements provided for in and connected to this Procedure.

In carrying out his or her function, the Person in Charge shall cooperate with specifically identified and engaged Company personnel.

More specifically, the Person in Charge is responsible for:

- a. preparing and updating the list of names of Internal Dealing Persons (the "**List**");
- b. designating one or more replacements in the event of his or her being unavailable;
- c. informing Internal Dealing Persons in writing of their inclusion in the relevant list and that they are subject to the obligations and prohibitions set forth in the Procedure and in the relevant laws;
- d. sending a copy of the Procedure together with the information referred to in letter c);
- e. assisting the Internal Dealing Persons so that MAR Relevant Transactions are disclosed to the Company within the terms and according to the procedures set forth under this Procedure;
- f. ensuring the receipt of notices and their dissemination to the public and to Consob, within the terms set forth in the Procedure, of MAR Relevant Transaction;
- g. storing the communications on MAR Significant Transactions and those disseminated to the

market;

- h. ensuring that Internal Dealing Persons are aware of this Procedure, providing, upon request, information and clarifications, in order to facilitate the correct fulfilment of the required disclosures;
- i. supervising, moreover, the application of the Procedure, as well as reporting, in case he or she becomes aware of them, any breaches by Internal Dealing Persons to the Board of Statutory Auditors, the Board of Directors and the Supervisory Board of the Company;
- j. analysing the maintenance over time of the requirements of soundness and functionality of the procedures referred to in this Procedure;
- k. proposing to the Board of Directors, through the Managing Director or the Chairman, any updates to the Procedure required by changes in the applicable laws, as well as informing the Board of Directors of any improvements and additions resulting from application experience and market practice on the subject.

The Person in Charge shall perform his or her duties in full compliance with the duties of confidentiality, integrity and diligence, never putting his or her personal interest before that of the Company, thus avoiding any situation, even potential, of conflict of interest.

In carrying out his or her duty, the Person in Charge shall also follow and comply with the principles set forth in the Company's Code of Ethics.

6. Disclosure of MAR Relevant Transactions

MAR Relevant Persons shall disclose MAR Relevant Transactions to the Company and to CONSOB.

More specifically, they disclose the MAR Relevant Transactions:

- a) to the Person in Charge of the Company, within three working days following the Date of Performance of the MAR Relevant Transaction by the following alternative methods: (i) forwarding the communication by email to the following address: ir@technoprobe.com and (ii) transmission of the communication by registered letter with return receipt to Technoprobe SpA at Via Cavalieri di Vittorio Veneto n. 02 - 23870 Cernusco Lombardone (LC) or (iii) transmission of the communication by registered letter by hand;
- b) to CONSOB promptly and, in any case, no later than the third working day following the Date of Performance of the MAR Relevant Transaction, by PEC to the address consob@pec.consob.it (if the sender is subject to the obligation to have a certified email address) or by email to the address protocollo@consob.it; in any case it is necessary to specify "Market Information Office" as the recipient and to indicate at the beginning of the subject line "MAR Internal Dealing".

The disclosure must include the information (where available) required by the model set out in the Annex to Implementing Regulation (EU) 2016/523 and annexed to this Procedure (**Annex A - Filing Model**), the responsibility for said disclosures remaining with them.

Prior to any disclosure to the Person in Charge, MAR Relevant Persons shall give advance notice of the transmission by telephone at the following number: +39 342.9743361

The Person in Charge shall in turn provide the MAR Relevant Persons, by email, with an acknowledgement of receipt of the notice.

Finally, the Company shall disclose the MAR Relevant Transaction to the public within two business days of receipt of the notification by sending a notice through the SDIR and by publishing on its website all information relating to each MAR Relevant Transaction carried out by a MAR Relevant Person. To this end, the Person in Charge shall disclose to the public - by means of the system of dissemination of regulated information and publication on the Company's website - the MAR Relevant Transactions carried out by MAR Relevant Persons notified to the Company in compliance with the terms and procedures set out in this Procedure.

MAR Relevant Persons may request that the Company make the disclosure of the MAR Relevant Transactions to CONSOB on their behalf. In such case, however, MAR Relevant Persons shall communicate to the Company the MAR Relevant Transactions carried out by them or by Persons Closely Associated with them by completing, signing and submitting the form set out in Annex A within one business day following the Transaction Date, addressing it to the Appointed Officer in accordance with the procedures set out in this Article. In such case, the Company shall comply, on behalf of the MAR Relevant Persons, with the disclosure obligations towards CONSOB referred to in this Article and within the above-mentioned deadlines, by transmitting the information received from the Relevant Person in accordance with the applicable laws and regulations

MAR Relevant Persons are responsible for the exact and timely disclosure of the information due to the Company, to CONSOB and to the public, and will therefore be liable to the Company for any damage, including to its image, suffered by it as a result of any failure to comply with their obligations.

7. Company's obligations to disclose

To allow the Company disclosing MAR Relevant Transactions to the public once the information has been received from the Internal Dealing Persons, the Person in Charge shall promptly prepare the public notice and disseminate it in accordance with the provisions of this Procedure.

8. Black-out periods

MAR Relevant Persons are prohibited from carrying out MAR Relevant Transactions on their own behalf or on behalf of third parties, directly or indirectly, during the 30 calendar days (the "**Closed Period**")² before the announcement of the annual and half-yearly financial reports and other periodic financial reports that the Company is required to publish in accordance with applicable laws and regulations.

The prohibition does not apply:

- i. in case of exceptional situations of subjective necessity, to be assessed on a case-by-case basis, such as, for example, serious financial difficulties requiring the immediate sale of shares or financial instruments other than shares;
- ii. because of the characteristics of the trade in the case of transactions conducted at the same time as, or in connection with any employee Equity Interest plans or a savings program and savings schemes and employee share plans relating to financial instruments other than shares, a guarantee or rights to shares and to guarantees or rights relating to financial instruments other

² If the Company publishes preliminary data, the Closed Period shall only apply to the date of publication of those preliminary data and not to the final data.

than shares, or transactions in which the beneficiary's interest in the security in question is not subject to change; and also

- iii. in the additional circumstances and conditions under Article 9 of the Delegated Regulation No. 2016/522 as set out in Annex C to this Procedure;
- iv. in the case of transactions or trading activities that do not involve active investment decisions taken by the MAR Relevant Person, or that result solely from external factors or actions of third parties, or that constitute transactions or trading activities, including the exercise of rights conferred by derivative instruments, carried out on the basis of pre-established conditions, without prejudice in any event to the obligations set out in Articles 14 and 15 of the MAR.

Exceptions to the prohibition as referred to in items (i), (ii) and (iii) of the preceding paragraph may be granted by the Board of Directors on reasonable grounds and more specifically, *inter alia*, where exceptional conditions such as serious financial difficulties requiring the immediate sale of Shares occur. The exemption referred to in item (iv) of the preceding paragraph shall apply without the need for any express authorization by the Board of Directors.

In addition to the provisions of the preceding paragraph, the Board of Directors may, by specific resolution, establish further periods during which the persons indicated in the preceding paragraph are prohibited or restricted from carrying out transactions.

The MAR Relevant Person concerned shall adequately justify in writing to the Company the MAR Relevant Transaction, describing its nature and the exceptional nature of the circumstances as well as demonstrating that the specific transaction cannot be carried out at any other time than during the Closed Period.

Circumstances shall be considered exceptional if they are extremely urgent, unforeseen and compelling situations that cannot be attributed to the MAR Relevant Person and are beyond his or her control.

In considering whether the circumstances described in the written request are exceptional, the Board of Directors shall assess, in addition to other indicators, whether and to what extent the MAR Relevant Person:

- i. at the time the request is submitted, shall fulfil a legally enforceable financial obligation or fulfil a claim;
- ii. shall fulfil or is in a situation that took place before the beginning of the Closed Period and requiring the payment of sum to a third party, including tax liability, and cannot reasonably satisfy a financial commitment or claim by means other than immediate sale of the Company's Financial Instruments.

9. Penalty System

In accordance with the Internal Dealing Rules, failure by Internal Dealing Persons to comply with the requirements set out in the Procedure may result in a breach of the Company's obligations and, more specifically, in the application of penalties against the Company and the Internal Dealing Persons in accordance with law in force.

In case of breach of this procedure, the Company shall take the measures set forth under the Italian Civil Code against those responsible, promoting claims for damages suffered by the Company as a result of the breach.

Furthermore, non-compliance with the provisions of this Procedure by Internal Dealing Persons, which may result in a failure by the Company to comply with the provisions of the MAR and the TUF, may result in the application of penalties of various nature against the Company.

Should the Company or a Subsidiary incur administrative pecuniary penalties as a result of a breach of the provisions on corporate disclosure as a consequence of non-compliance with the principles set forth in this Procedure or in the applicable laws or regulations, the Company shall also recourse against the persons responsible for those breaches, to obtain reimbursement of the charges relating to the payment of said penalties.

In any case, breach of the provisions under this Procedure, even where not resulting in a behaviour directly sanctioned by the judicial authority or by Borsa Italiana S.p.A., may represent a serious damage for the Company, also in terms of image, with serious consequences on an economic and financial level. Accordingly, the breach entails the possibility for the Company to claim compensation from the person responsible for the damages suffered by the Company and its Subsidiaries.

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

If the breach has been committed by an employee, this may constitute a disciplinary offence and, in the most serious cases, may result in dismissal.

In case of late disclosure, or incomplete disclosure with regard to the information under the model annexed to this Procedure, the Company shall notify CONSOB and the public, specifying that the delay/incompleteness of the disclosure is attributable exclusively to Internal Dealing Persons.

Finally, it should be noted that failure to comply with the obligations under the laws on transactions carried out by Internal Dealing Persons is sanctioned, *inter alia*, under Articles 187-ter.1 and 193 of the TUF.

10. 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 or changes of a non-substantial nature (e.g. changes in email addresses, telephone numbers, etc.), this Procedure may be amended and/or supplemented by the Chairman of the Board of Directors or the Managing Director and disclosed to the Board of Directors at the first subsequent meeting.

Amendments and/or supplements to the provisions of the Procedure shall be notified to MAR Relevant Persons. The notice shall also indicate the date of entry into force of the new or amended provisions.

11. Final Provisions

The Person in Charge shall send this Procedure to all MAR Relevant Persons. MAR Relevant Persons are required to: (i) return a signed copy of the notice under Annex D to this Procedure for receipt and acceptance and notify the Person in Charge of the list of Closely Associated Persons as well as any subsequent update of the names and data previously notified and any new names to be included; (ii)

comply with the provisions under this Procedure; and (iii) contact the Person in Charge if they need any clarification on the application of this Procedure.

12. Processing of Personal Data

Upon receipt of the Procedure, MAR Relevant Persons shall sign a notice, in the form under Annex D , certifying, *inter alia*: i) full acceptance of the contents of the Procedure; ii) the commitment to notify in writing to their Closely Associated Persons their obligations under the Procedure and the Internal Dealing Rules and to store a copy of the relevant notification; and iii) consent to the processing of personal data in accordance with applicable privacy laws, where applicable.

For the purposes of the Procedure, the Company may be required to process and store certain personal data of Internal Dealing Persons. The personal data of which the Company will become aware as a result of the notices received shall be processed in application of the Procedure, also through third parties, for the sole purpose of complying with the Internal Dealing Rules.

Internal Dealing Persons are, therefore, required by virtue of those legal and regulatory provisions to provide personal data and information that the Company, in its role as data controller, will process for the purposes and in the manner better described in the information notice under Article 13 of EU Regulation No. 679/2016 on the protection of personal data (“**GDPR**”) and under the relevant legal provisions, included in Annexes D and E to this Procedure. The legal basis for the processing of the personal data in question is based both on a legal obligation and on the assessment by the Company, as Data Controller, of the existence of a legitimate interest aimed at safeguarding the market and preventing fraud, in accordance with the GDPR and subsequent amendments or supplements.

By signing Annexes D and E , the Internal Dealing Persons declare that they have read and understood everything concerning the processing of their personal data. Any refusal to provide the requested data would make it impossible for the Company to fulfil its obligations under the Internal Dealing Rules and may justify the imposition of penalties.

ANNEXES:

Annex A: Filing Model

Annex B: MAR Relevant Transactions

Annex C: Circumstances and conditions under Article 9 of Delegated Regulation (EU) No. 2016/522 determining exemption from the black-out period prohibition

Annex D: Notice to MAR Relevant Persons model

Annex E: Notification to Closely Associated Persons model

Annex A - Filing Model

Annex to Delegated Implementing Regulation (EU) No. 2016/523

Model for notification and public disclosure of transactions by persons discharging administrative, supervisory or managerial responsibilities and persons closely associated with them

1 Data relating to the person discharging managerial responsibilities/the person closely associated with them

- a) Name *[For natural persons: name and surname]*
- [For legal persons: name, including legal form as provided for in the register in which it is registered, if applicable.]*

2 Reason for notification

- a) Position/qualification *[For persons discharging administrative, supervisory or managerial functions: please indicate the position (e.g. managing director, financial director) held within the issuer, the participant in the emission allowance market, the auction platform, the auctioneer, the auction monitor.]*
- [For closely associated persons,*
- indicate that the notification concerns a person closely associated with a person exercising administrative, control or management functions;*
 - name and surname and position of the relevant person discharging administrative, supervisory or managerial functions.]*
- b) Initial/amended notification *[Indicate whether it is an initial notification or an amendment to a previous notification. In case of amendment, explain the error being corrected by this notification.]*

3 Data relating to the issuer, the participant in the emission allowance market, the auction platform, the auctioneer or the auction monitor

- a) Name *[Full name of the entity.]*
- b) LEI *[Legal entity identification code, in accordance with the LEI code under ISO 17442.]*

4 Transaction data: section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where the transactions were carried out

a) Description of the financial instrument, type of instrument
 Identification code

[- Indicate the nature of the instrument:

- a share, debt instrument, derivative or financial instrument related to a share or debt instrument;*
- an emission allowance, an auctioned product based on emission allowances or an emission allowance derivative.*
- [Instrument identification code as defined in the Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on transaction reporting to competent authorities adopted in accordance with Article 26 of Regulation (EU) No. 600/2014.]*

b) Nature of the transaction

[Description of the type of transaction using, where necessary, the types of transactions set out in Article 10 of Commission Delegated Regulation (EU) No. 2016/522⁽¹⁾ adopted in accordance with Article 19, section 14, of Regulation (EU) No. 596/2014 or one of the specific examples set out in Article 19, section 7, of Regulation (EU) No. 596/2014.

In accordance with Article 19, section 6, letter e), of Regulation (EU) No. 596/2014, please indicate whether the transaction is linked to the use of share option programmes]

c) Price(s) and volume(s)

Price(s)	Volume(s)

[If several transactions of the same nature (purchase, sale, borrowing and lending, etc.) on the same financial instrument or on the same emission allowance are carried out on the same day and in the same place, indicate in this field the prices and volumes of these transactions, in two columns as illustrated above, inserting all the necessary rows.

Use data standards for price and quantity, including, where necessary, the currency of the price and the currency of the quantity, as defined by the Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on transaction reporting to competent authorities adopted pursuant to Article 26 of Regulation (EU) No. 600/2014.]

d) Aggregated information *[The volumes of multiple transactions are aggregated when these transactions:*

- Aggregate volume — *pertain to the same financial instrument or emission allowance;*
- Price — *are of the same nature;*
- *are carried out on the same day and*
- *are carried out in the same place;*

Use data standards for the quantity, including, where necessary, the currency of the quantity, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on transaction reporting to competent authorities adopted pursuant to Article 26 of Regulation (EU) No. 600/2014]

[Price information:

- *in the case of a single transaction, the price of the individual transaction;*
- *where multiple transaction volumes are aggregated: the weighted average price of the aggregated transactions.*

Use the data standards for the price, including, where necessary, the currency of the price, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on transaction reporting to competent authorities adopted pursuant to Article 26 of Regulation (EU) No. 600/2014.]

- e) Date of the transaction *[Date of the day of performance of the notified transaction.*
Use ISO 8601 format: YYYY-MM-DD; UTC time]
- f) Place of the transaction *[Name and identification code of the trading venue pursuant to the MiFID, of the systematic internaliser or organised trading platform outside the Union where the transaction was executed as defined by the Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council, concerning regulatory technical standards on transaction reporting to competent authorities, adopted under Article 26 of Regulation (EU) No. 600/2014, or*
if the transaction was not performed on one of the above venues, report “outside a trading venue.”]

(1) Delegated Regulation (EU) of 17 December 2015 No. 522/2016 of the Commission supplementing Regulation (EU) No. 596/2014 of the European Parliament and of the Council concerning the exemption of certain public bodies and third country central banks, market manipulation indicators, reporting thresholds, the competent authority for delay notifications, permission to trade during periods of closure and types of

transactions entered into by persons exercising administrative, supervisory or managerial functions that are subject to notification

ANNEX B

MAR Relevant Transactions include:

1. the pledging or lending of Financial Instruments by or on behalf of a MAR Relevant Person or a Person Closely Associated with MAR Relevant Persons³;
2. transactions carried out by persons professionally arranging or carrying out transactions or by any other person on behalf of a MAR Relevant Person or a Person Closely Associated with MAR Relevant Persons, including where discretion is exercised; and
3. transactions carried out in the context of a life insurance policy within the meaning of Directive 2009/138/EC, where:
 - i. the policyholder is a MAR Relevant Person or a Person Closely Associated with MAR Relevant Persons;
 - ii. the investment risk is borne by the policyholder;
 - iii. the policyholder has the power or the discretion to take investment decisions in relation to specific instruments covered by the life insurance concerned, or to carry out transactions involving the specific instruments of that life insurance. To the extent that a policyholder of an insurance contract is required to notify transactions under this Procedure, the insurance company does not have a notification obligation.

Furthermore, transactions subject to notification include:

- a) the acquisition, assignment, short sale, subscription or exchange;
- b) the acceptance or exercise of an option right, including of an option right granted to managers or employees as part of their remuneration package, and the disposal of shares stemming from the exercise of an option right;
- c) the entering into or exercise of equity swaps relating to stock indices; d) the transactions in derivative or related instruments, including cash-settled transactions;
- e) the entering into a contract for difference on a financial instrument of the concerned issuer or on emission allowances or auction products based thereon;
- f) the acquisition, disposal or exercise of rights, including put and call options, and warrants;
- g) subscription to a capital increase or debt instrument issuance;
- h) transactions in derivatives and related Financial Instruments to a debt instrument of the concerned issuer, including credit default swaps;
- i) conditional transactions upon the occurrence of the conditions and actual execution of the transactions;
- j) automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of convertible bonds to shares;
- k) the gifts and donations made or received and inheritances received;

³ Article 19 of the MAR clarifies: “For the purposes of letter a) it is not necessary to notify a pledge of financial instruments, or other similar security, in connection with the deposit of securities in a deposit account unless and until such pledge or other security becomes ancillary to obtaining a specific credit facility”.

- l) the transactions executed in index-related products, baskets and derivatives, insofar as required by Article 19 of Regulation (EU) No. 596/2014;
- m) the transactions carried out in shares or quotas of investment funds, including alternative investment funds (AIFs) referred to in Article 1 of Directive 2011/61/EU of the European Parliament and of the Council⁴, insofar as required by Article 19 of Regulation (EU) No. 596/2014;
- n) transactions carried out by the manager of an AIF in which the person discharging managerial responsibilities or a person closely associated with such a person has invested, insofar as required by Article 19 of Regulation (EU) No. 596/2014;
- o) transactions carried out by a third party in the context of an asset management mandate or portfolio on an individual basis for the account or benefit of a person discharging administrative, supervisory or managerial responsibilities or a person closely associated with him or her;
- p) borrowing or lending of quotas or debt instruments of the issuer or derivatives or other Financial Instruments linked thereto.

⁴Directive 2011/61/EU of the European Parliament and of the Council, of 8 June 2011, on alternative investment fund managers, which amends Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No. 1060/2009 and (EU) 1095/2010 (Official Gazette L 174 of 1 July 2011, p. 1).

Annex C**Circumstances and conditions under Article 9 of Delegated Regulation (EU) No. 2016/522 determining exemption from the black-out period prohibition****Article 9 of Delegated Regulation (EU) No. 2016/522**

“The issuer shall have the right to permit the person discharging administrative, supervisory and managerial responsibilities within the issuer to trade on its own account or for the account of a third party during a closed period, including but not limited to circumstances where:

- a. the person discharging administrative, supervisory and managerial responsibilities was granted or allocated financial instruments in the context of an employee plan, provided that the following conditions are met:
 - i. the employee plan and its terms and conditions have been previously approved by the issuer in accordance with national law and the terms and conditions of the employee plan specify the timing of the award or the grant and the amount of financial instruments awarded or granted, or the basis on which such an amount is calculated and given that no discretion can be exercised;
 - ii. the person exercising administrative, supervisory or managerial functions has no discretion as to the acceptance of the financial instruments allotted or granted;
- b. the person discharging administrative, supervisory and managerial responsibilities was granted or awarded financial instruments under an employee plan that is implemented during the closed period, provided that a method is applied that is planned in advance and organised in terms of the conditions, frequency and timing of the award provided that the group of authorised persons to whom the financial instruments are granted and the amount of financial instruments to be granted are indicated, and provided that the granting or awarding of the financial instruments takes place within a defined framework in which such granting or awarding cannot be influenced by any inside information;
- c. the person discharging administrative, supervisory and managerial responsibilities exercises options or warrants or conversion of convertible bonds assigned to him or her under an employee plan when the expiration date of such options, warrants or convertible bonds falls within a closed period, and sells the shares acquired pursuant to such exercise or conversion, provided that all of the following conditions are met:
 - i. the person discharging administrative, supervisory and managerial responsibilities notifies the issuer of its decision to exercise or convert options, warrants or conversion rights at least four months before the expiration date;
 - ii. the decision of the person discharging the responsibilities above is irrevocable;
 - iii. the person discharging administrative, supervisory and managerial responsibilities has been authorised in advance by the issuer;
- d. the person discharging administrative, supervisory and managerial responsibilities acquires the issuer’s financial instruments under an employee saving plan, provided that all of the following conditions are met:

- i. the person discharging administrative, supervisory and managerial responsibilities has entered into the plan before the closed period, except when it cannot enter into the plan at another time due to the date of commencement of employment;
 - ii. the person discharging administrative, supervisory and managerial responsibilities does not alter the conditions of his participation into the plan or cancel his participation into the plan during the closed period;
 - iii. the purchase operations are clearly organised under the plan terms and that the person discharging administrative, supervisory and managerial responsibilities has no right or legal possibility to alter them during the closed period, or are planned under the plan to intervene at a fixed date which falls in the closed period;
- e. the person discharging administrative, supervisory and managerial responsibilities transfers or receives, directly or indirectly, financial instruments, provided that they are transferred from one account to another of that person and that the transfer does not involve a change in their price;
- f. the person discharging administrative, supervisory and managerial responsibilities acquires a security or rights relating to the issuer's shares and the final date of such acquisition is included in the closed period in accordance with the issuer's Articles of Association or the law, provided that such person demonstrates to the issuer the reasons why the acquisition did not take place at another time and the issuer accepts the explanation provided."

ANNEX D**Notice to MAR Relevant Persons model**

Subject: Notice in accordance with the laws in force and the Internal Dealing Procedure of Technoprobe S.p.A. Inclusion in the list of Internal Dealing Persons.

Dear _____,

We hereby inform you that, in accordance with the procedure on internal dealing (the “**Internal Dealing Procedure**”) adopted by Technoprobe S.p.A. (the “**Company**”) in compliance with the legal obligations under Article 19 of Regulation (EU) No. 596/2014 of 16 April 2014 (the “**MAR**”) and Delegated Regulation (EU) No. 2016/522 of the Commission of 17 December 2015, you have been included in the list of Internal Dealing Persons of the Company (the “**List**”).

For the obligations arising from this inclusion and the relevant operational aspects, please refer to the contents of the Internal Dealing Procedure (annexed hereto) and the law referred to therein. We also remind you that insider dealing and market manipulation are offences that may be punished under criminal and administrative sanctions under the laws applicable from time to time.

We also inform you that you are required to inform in writing the Persons Closely Associated with you (as defined in the Internal Dealing Procedure) of their obligations under the internal dealing laws. To this end, you may use the model annexed hereto and store a copy of this notice.

Please confirm your acknowledgement and acceptance of this notice and the annexed Procedure by signing a copy of the declaration below.

Kind regards,

* * *

I, the undersigned _____, born in _____ on _____, Tax Code _____, in the capacity of

MAR Relevant Person under the Internal Dealing Procedure;

ACKNOWLEDGE

that I have been included in the List of Internal Dealing Persons under the Internal Dealing Procedure adopted by the Company; and

DECLARE

that I am aware of the obligations under the Community and national provisions applicable from time to time on internal dealing and that I have received adequate information, as well as a full copy of the Company’s Internal Dealing Procedure and accept its content, undertaking to comply with its provisions and to notify the persons qualified as Closely Associated Persons to the same in accordance with the applicable laws and the Internal Dealing Procedure.

More specifically, I, the undersigned, undertake to: (i) notify in writing the Internal Dealing Procedure to the persons closely associated with me; (ii) store a copy of the notification; and (iii) forward a copy of the notification also to the Person in Charge.

I, the undersigned, hereby submit the following list of Persons Closely Associated with me.

LIST OF PERSONS CLOSELY ASSOCIATED WITH THE MAR RELEVANT PERSON			
SPOUSE OR PARTNER TREATED AS SPOUSE UNDER ITALIAN LAW			
SURNAME AND NAME	DATE AND PLACE OF BIRTH	TAX CODE	
DEPENDENT CHILDREN UNDER NATIONAL LAW			
SURNAME AND NAME	DATE AND PLACE OF BIRTH	TAX CODE	
RELATIVES WHO HAVE SHARED THE SAME HOUSEHOLD FOR AT LEAST ONE YEAR			
SURNAME AND NAME	DATE AND PLACE OF BIRTH	TAX CODE	
LEGAL PERSONS, TRUSTS AND PARTNERSHIPS WHOSE MANAGERIAL RESPONSIBILITIES ARE HELD BY THE MAR RELEVANT PERSON OR ONE OF THE CLOSELY ASSOCIATED PERSONS LISTED ABOVE			
COMPANY NAME	REGISTERED OFFICE	TAX CODE AND VAT NUMBER	POSITION HELD (AND INDICATION OF PERSON CLOSELY ASSOCIATED WITH THE MAR RELEVANT PERSON)

Signature

In accordance with Article 13 of EU Regulation No. 679/2016 on the processing of personal data, as amended and supplemented (“**GDPR**”), we finally inform you that the collected personal data are necessary for the purpose of registration in the list of Internal Dealing Persons and for the relevant updates. Those data will be processed and stored by the Company, in its capacity as data controller, with the aid of computerised and paper media, in accordance with the provisions of the GDPR, for the purpose of fulfilling the obligations under the law on market abuse in force and the processing of inside information and for the period required under the law above. The data controller’s employees and consultants, who have been assigned to the relevant departments and have been duly appointed to process the data, can gain access to the data in fulfilment of the aforementioned purpose. The data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, that will act as Data Controllers or Processors, in the latter case subject to appointment. The data may also be disclosed abroad, to countries outside the European Union, adopting the appropriate measures and precautions as provided for by the GDPR. The list of the persons to whom the data may be disclosed is always available upon request to the Company. Providing the requested personal data is therefore mandatory. Refusal to provide them could expose you and the Company to possible penalties under the law in force and/or the Procedure.

You may exercise the rights under Articles 15-22 of the GDPR (including, for example, the right to access your personal data, to request that they are rectified, updated, or, if necessary, erased) by making an informal request to the controller or the processor of your personal data, who can be reached at the Company’s registered office. Finally, if you consider that the processing of the provided data breaches the law on the protection of personal data, you have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

For any information and/or clarification on this notice and its application, please contact the Person in Charge under the Procedure by email at ir@technoprobe.com.

Kind regards,

Technoprobe S.p.A.

For confirmation

ANNEX E

Notification to Closely Associated Persons model

Dear Mr [●] / Dear Ms [●], [address]

[by [●]]

[●, [date]]

Subject: notice to Closely Associated Persons in accordance with Technoprobe S.p.A. Internal Dealing Procedure.

Dear Mr [●] / Dear Ms [●], Dear [●],

I am writing this letter in accordance with the Internal Dealing Procedure of Technoprobe S.p.A. (the “**Company**”), annexed hereto (the “**Procedure**”), to inform you [or alternatively] to inform [●] [insert the name of the legal person to which the information is addressed] of the following.

In light of my position as [●] of the Company [or as a person holding shares amounting to 10% of the Company’s share capital / controlling the Company], the legal provisions on Internal Dealing in force and the relevant Procedure adopted by the Company apply to me.

As a result of the foregoing, in view of our relationship [as the case may be, specify the nature of the relationship between the MAR Relevant Person and the Closely Associated Person], you [or alternatively] [●] [insert the name of the legal person to which the information is addressed] may be qualified as [Person Closely Associated with me] in accordance with the law in force and the aforementioned Procedure.

For this reason, I have provided to the Company your name [or alternatively] the name of [●] [insert name of the legal person to which the information is addressed] and the relevant identification data so that the Company may register you [or alternatively] [insert name of the legal person to which the information is addressed], as a Person Closely Associated with me, in the list of Internal Dealing Persons that the Company is required to prepare under the law in force and the Procedure.

In relation to the foregoing, I [or alternatively] invite [●] [insert the name of the legal person to which the information is addressed] to:

- read this notice and its annexes;
- promptly return this notice to me, signed as acknowledgement of receipt and reading of notice, the Procedure and the annexes thereto.

Please note that failure to comply with Internal Dealing obligations may be sanctioned in accordance with the laws in force.

* * * * *

In accordance with Article 13 of EU Regulation No. 679/2016 on the processing of personal data, as amended and supplemented (“**GDPR**”), we finally inform you that the collected personal data are necessary for the purpose of registration in the list of Internal Dealing Persons and for the relevant updates. Those data will be processed and stored by the Company, in its capacity as data controller, with the aid of computerised and paper media, in accordance with the provisions of the GDPR, for the

purpose of fulfilling the obligations under the law on market abuse in force and the processing of inside information and for the period required under the law above. The data controller's employees and consultants, who have been assigned to the relevant departments and have been duly appointed to process the data, can gain access to the data in fulfilment of the aforementioned purpose. The data may be disclosed, for the same purposes, to the competent authorities, to companies providing services to the Company, that will act as Data Controllers or Processors, in the latter case subject to appointment. The data may also be disclosed abroad, to countries outside the European Union, adopting the appropriate measures and precautions as provided for by the GDPR. The list of the persons to whom the data may be disclosed is always available upon request to the Company. Providing the requested personal data is therefore mandatory. Refusal to provide them could expose to possible penalties under the law in force and/or the Procedure.

It will be possible to exercise the rights under Articles 15-22 of the GDPR (including, for example, the right to access your personal data, to request that they are rectified, updated, or, if necessary, erased) by making an informal request to the controller or the processor of your personal data, who can be reached at the Company's registered office. Finally, if you consider that the processing of the data provided breaches the legislation on the protection of personal data, it is possible to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

For any information and/or clarification on this notice and its application, please contact, in addition to the undersigned, the Person in Charge identified by the Company in accordance with the Procedure, by email at ir@technoprobe.com.

Kind regards,

Technoprobe S.p.A.

For confirmation
