References: European Market Abuse Regulation

INTERNAL REGULATION GOVERNING INSIDE INFORMATION

(version approved by the Board of Directors on November 6, 2025)

References: European Market Abuse Regulation

SOMMARIO

References: European Market Abuse Regulation

1. PREMISES AND PURPOSE

The Board of Directors of d'Amico International Shipping S.A., a Luxembourg law governed public limited liability company (*société anonyme*) having its registered office at 25C, Boulevard Royal, 2449 Luxembourg, Grand Duchy of Luxembourg and being registered with the Luxembourg Trade and Companies' Register under number B124790 (hereinafter the **"Company"** or the **"Parent Company"** or also **"DIS"**), in accordance with the provisions of article 2 below, has adopted this internal regulation (hereinafter the **"Regulation"**) in order to regulate the internal management and external communication of inside information, as defined below, and documents concerning DIS and its Subsidiaries (as defined below) (the Subsidiaries together with the Company, the **"DIS Group"**).

By this Regulation, which does not govern the management of advertising and commercial information, which are disclosed through different channels and methods, DIS, in addition to the objective of complying with current legislation on the subject, seeks to ensure the appropriate management and disclosure/communication of inside information relating to the Company by persons in possession of such information and, consequently, to protect investors by preventing information asymmetries and speculative transactions based on the possession of such information by persons acting on behalf of and/or for the account and/or in the interest of the Company. This also represents a risk management measure aimed at protecting the Company and its Corporate Bodies from any liability arising from a breach of the aforementioned rules.

This Regulation applies to the companies of the DIS Group and, more generally, to all companies of d'Amico group (including the parent company of DIS up to the ultimate parent company and other companies controlled by them, including foreign companies - hereinafter also referred to in its entirety as the "**d'Amico Group**"), in compliance with and subject to local regulations applicable to them and their operational independence.

This Regulation also contains general provisions relating to the establishment, structure, and management of the register of persons who have access to inside information, as defined below, referring to the document attached hereto **Annex A** ("**Keeping and Updating of the Insider List")** for further details in this regard.

2. APPLICABLE LEGISLATION

This Regulation has been adopted in application of and/or in order to take into account (hereinafter referred to jointly as the **"Relevant Regulations"**):

References: European Market Abuse Regulation

(a) Regulation (EU) No. 596/2014 of the European Parliament and of the Council of April 16, 2014 on market abuse (repealing Directive 2003/6/EC of the European Parliament and of the Council and Directives 2003/124/EC, 2003/124/EC and 2004/72/EC of the Commission), as subsequently amended and/or supplemented (hereinafter the **"Market Abuse Regulation"** or the **"MAR"**);

(b) the European Commission's Implementing Regulation (EU) 2016/1055 of June 29, 2016, which lays down implementing technical standards with regard to the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information;

(c) Regulation (EU) 2016/1011 of the European Parliament and of the Council of June 8, 2016, which, among other things, amends the MAR;

(d) Regulation (EU) 2016/1033 of the European Parliament and of the Council of June 23, 2016, which, among other things, amends the MAR;

(e) Commission Delegated Regulation (EU) 2016/960 of May 17, 2016, supplementing Regulation (EU) No. 596/2014 of the European Parliament and of the Council with regard to regulatory technical standards on the appropriate arrangements, procedures, and systems to be adopted by market participants when disclosing information in the context of market soundings;

(f) Commission Implementing Regulation (EU) 2016/959 of May 17, 2016, laying down implementing technical standards on market soundings with regard to the systems and templates to be used by market participants when reporting information, as well as the format of related records;

(g) Commission Delegated Regulation (EU) 2016/522 of December 17, 2015, supplementing Regulation (EU) No. 596/2014 of the European Parliament and of the Council (the "Regulation 2016/522");

(h) Regulation (EU) 2019/2115 of the European Parliament and of the Council of November 27, 2019, amending Directive 2014/65/EU and Regulations (EU) No. 596/2014 and (EU) 2017/1129 as regards the promotion of the use of growth markets for SMEs;

(i) Commission Implementing Regulation (EU) 2022/1210 of July 13, 2022, laying down implementing technical standards for the application of the MAR with regard to the format of insider lists and their updates;

(j) the CSSF circulars issued from time to time and applicable to the disclosure of inside information (hereinafter the **"CSSF Circulars"**);

References: European Market Abuse Regulation

(k) Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter the **"General Data Protection Regulation"**);

(l) Regulation (EU) 2024/2809 of the European Parliament and of the Council of October 23, 2024, amending Regulations (EU) 2017/1129, (EU) No. 596/2014, and (EU) No. 600/2014 to make public capital markets in the Union more attractive to companies and to facilitate access to capital for small and medium-sized enterprises (as of the effective date of the relevant amendments);

(m) Luxembourg law of 23 December 2016 on market abuse, as amended from time to time[1]; and, where applicable,

(n) Legislative Decree No. 58 of February 24, 1998, "Consolidated Law on Financial Intermediation," as subsequently amended (hereinafter the **"TUF"**);

(o) Consob Regulation No. 11971 of May 14, 1999, implementing Legislative Decree No. 58 of February 24, 1998, concerning the regulation of issuers, as subsequently amended (hereinafter the **"Issuers Regulation"**);

(p) the Regulations of the Markets organized and managed by Borsa Italiana S.p.A. (hereinafter the **"Stock Exchange Regulations"**);

(q) the Instructions to the Regulations of the Markets organized and managed by Borsa Italiana S.p.A. (hereinafter the "**Stock Exchange Instructions**");

(r) the Corporate Governance Code approved by the Corporate Governance Committee of Borsa Italiana

[1] A draft bill of law number 8567 amending said law was introduced on July 2, 2025 to the Luxembourg Chamber of Deputies (*Chambre des Députés*), addressing, among others, two main objectives:

1. Transposition of European Directive (EU) 2023/2864 of the European Parliament and of the Council of December 13, 2023, amending certain directives as regards the establishment and operation of the European single access point.

2. Implementation of the following regulations:

a) Regulation (EU) 2023/2859 of the European Parliament and of the Council of December 13, 2023, establishing a European single access point providing centralized access to publicly available information relevant to financial services, capital markets and sustainability;

b) Regulation (EU) 2023/2869 of the European Parliament and of the Council of December 13, 2023, amending certain regulations as regards the establishment and operation of the European single access point;

c) Regulation (EU) 2024/3005 of the European Parliament and of the Council of November 27, 2024, on the transparency and integrity of environmental, social and governance (ESG) rating activities, and amending Regulations (EU) 2019/2088 and (EU) 2023/2859.

S.p.A (hereinafter "**CG Code**").;

(s) the Consob guidelines on the management of inside information of October 2017, as subsequently supplemented (hereinafter the **"Consob Guidelines"**);

also taking into account the regulatory provisions, technical implementation rules, principles, application criteria, and Guidelines listed above, as amended or supplemented from time to time, together with any additional legislative, regulatory, and administrative provisions in force at the relevant time, whether at the EU or national level, including technical implementation rules, guidelines, guidelines, and opinions of the Commission, ESMA, Consob, CSSF, and other competent authorities, that collectively constitute the regulatory framework governing the handling of confidential, relevant, and privileged information and market abuses.

3. DEFINITIONS

Without prejudice to any additional definitions contained in this Regulation, capitalized terms not otherwise defined shall have the meanings assigned to them in this article.

Board of Directors or **BoD:** means the board of directors of the Company.

Chairman: refers to the Chairman of the Company's Board of Directors.

Chief Executive Officer or **CEO**: means the chief executive officer of the Company.

Chief Financial Officer or **CFO**: refers to the Company's Chief Financial Officer.

Commission: means the European Commission.

Consob: means Commissione Nazionale per le Società e la Borsa, the public authority responsible for supervising Italian financial markets.

CSSF: means the Commission de Surveillance du Secteur Financier, the Luxembourg financial markets supervisory authority.

Delay: refers to the failure to promptly disclose Inside Information concerning the Company to the public in the cases permitted by the Relevant Regulations and this Regulation.

References: European Market Abuse Regulation

Division: refers to the division of the Company responsible for an organizational unit/business function (e.g., the finance division) or the organizational unit/business function outsourced to a Service Provider.

eMarket SDIR/eMarket STORAGE: refers to the official mechanism adopted by the Company for the proper disclosure to the public, archiving, and storage of inside information in Italy.

Employees: refers to the employees of the Company or its Subsidiaries, as defined below in this Regulation.

ESMA: means European Securities and Markets Authority.

Financial Instruments: means "financial instruments" as defined in Article 4(1)(15) of Directive 2014/65/EU of the European Parliament and of the Council of May 15, 2014 (as subsequently amended): any instrument listed in Section C of Annex I, including instruments issued using distributed ledger technology.

FOCIP: refers to the functions or organizational units—called Competent Insider Functions—that are involved in various ways in the handling of relevant or privileged information.

FOCIP Process Owner: refers to the person responsible for each Division who, by virtue of the function performed and/or the intra-group services provided, is aware of relevant or specific information or information that could be considered inside information for the Company.

Funzione Gestione Informazioni Privilegiate or **FGIP**: refers to the Chairman and/or Chief Executive Officer who are responsible for overseeing the implementation and enforcement of this Regulation and the related operating procedure (as described below).

Inside Information: means information concerning DIS (directly or indirectly, including through its Subsidiaries) and/or its Financial Instruments within the meaning of the Relevant Regulations and, in particular, within the meaning of Article 7 of the MAR, and shall mean: "[...] *information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to 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 or on the price of related derivative financial instruments*" (Article 7, first paragraph, letter a, of the MAR).

Information is considered to be **precise** (Article 7, second paragraph, of the MAR):

a) if it indicates a **set of circumstances** which exists or which may reasonably be expected to come into existence;

b) or **an event** which has occurred or which may reasonably be expected to occur; and

c) if that information is **specific enough** to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument, the related spot commodity contracts, or the auctioned products based on the emission allowances. 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.

By " *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. (Article 7, paragraph 4 of the MAR).

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 in the Article 7 of the MAR (Article 7, paragraph 3 of the MAR).

Insider List: refers to the register of persons who have access to Inside Information on a permanent or occasional basis, which is established and maintained by the Company in accordance with the Relevant Regulations.

Insider List Manager or **Supervisor**: refers to the person responsible for maintaining the Insider List. This role is performed by the International Corporate & Legal Affairs department, which maintains the register through the use of an external provider.

International Corporate & Legal Affairs: refers to the International Corporate & Legal Affairs department of the Company.

Investor Relations Manager*:* refers to the person responsible for relations with Institutional Investors and other shareholders of the Company.

Legal Representative: Regardless of the definition in the Company's articles of association and for the sole purposes of this Regulation, the Chairman, CEO, and CFO are jointly or severally considered to be the Company's legal representatives.

OAM: Luxembourg Stock Exchange, the official Luxembourg mechanism chosen by the Company for the storage of regulated information in Luxembourg.

Operating Procedure: refers to the procedure that sets out the obligations, prohibitions, and conduct to be observed in compliance with and for the purposes of implementing this Regulation and the rules provided for in the Relevant Regulations.

Recipients: the persons required to comply with this Regulation in accordance with the Relevant Regulations and as identified below (see paragraph 4 below).

Service Agreement: refers to any agreement between a Service Provider (as supplier) and the Company (as purchaser) for the provision of essential services and business functions such as, for example: accounting, tax, financial and cash services, ICT services, legal services, HR and business development services, and trademark consulting services.

Service Provider: means a company that is not a Subsidiary and that provides services and/or business functions to the Company in accordance with the terms and conditions of a Service Agreement.

Shares: means the shares of the Company admitted to trading on the regulated market of Borsa Italiana S.p.A..

Subsidiaries: refers to the Company's subsidiaries pursuant to the Luxembourg law of 10 August 1915 concerning commercial companies, as amended and coordinated from time to time, and any other applicable regulations, including Italian regulations.

4. RECIPIENTS

The **Recipients** required to comply with the provisions of this Regulation are:

a) members of the administrative, management, and control bodies and employees of the Company and its Subsidiaries that become aware or handle Company's information;

b) all Service Providers who, in the course of their employment, profession, or function on behalf of the Company, have access, on a regular or occasional basis, to confidential, relevant or Inside Information relating to the Company.

The Recipients shall certify, by the most appropriate means identified by the Company, that they have read the Regulation, are aware of the responsibilities arising therefrom, both in terms of obligations and in terms of possible penalties for violations, and undertake the obligation to comply with and scrupulously fulfill the provisions contained therein.

The Company shall take appropriate measures to ensure that the Recipients provide it with all the necessary information to fulfill the obligations set forth in the rules provided for in the Relevant Regulations and this Regulation for the purposes of immediate disclosure to the public of Inside Information concerning the Company. All Recipients who work in the interests of the Company and its Subsidiaries are bound by an obligation of confidentiality regarding information acquired or processed in the course of or in connection with the performance of their duties.

Violation of the obligations referred to in the previous paragraph, without prejudice to the consequences of any civil, criminal, and/or administrative offenses, may result in disciplinary sanctions or the termination of the relationship with the Company and/or its Subsidiaries.

Specifically, Recipients who come into possession of confidential, relevant, or Inside Information must:

- maintain the utmost confidentiality regarding documents and information acquired in the course of their work or professional activities, function, or office, and not disclose or reveal them outside of the cases provided for in the agreements and the Relevant Regulations;
- use the Inside Information exclusively for the purposes of carrying out their work, profession, function, or office in compliance with this Regulation, the Relevant Regulations, and, therefore not to use it, for any reason or cause, for purposes other than those for which it is in their possession, and, in particular, for personal purposes, for the commission of unlawful acts, or to the detriment of the Company or its Subsidiaries;
- handle Inside Information with all necessary precautions, so that it circulates within and outside the

Company in compliance with the Relevant Regulations, this Regulation, and the Operating Procedure;

- - comply with the provisions of the Relevant Regulations, this Regulation, and the Operating Procedure for the external communication of documents and Inside Information;
- - ensure the utmost confidentiality and secrecy of Inside Information until it is disclosed to the market in accordance with this Regulation and the Operating Procedure.

Furthermore, pursuant to Article 8 of the MAR, Recipients in possession of Inside Information are prohibited from using it to:

a) purchase, sell, or carry out transactions, directly or indirectly, on their own behalf or on behalf of third parties, in Financial Instruments of the Company to which the Inside Information relates;

b) recommend or induce others, on the basis of Inside Information, to carry out any of the transactions referred to in letter a);

c) carry out, in the name and/or on behalf of the Company, purchases, sales, or any other transactions on the Financial Instruments to which the Inside Information relates, using such information;

d) cancel or modify, on the basis of Inside Information, an order concerning a Financial Instrument to which the information relates when that order was placed before the person concerned came into possession of such Inside Information (so-called front-running);

e) communicate by any means the Inside Information of which they have become aware, unless it is essential in the normal course of their work, profession, or duties;

f) give interviews to the press or make statements in general that contain Inside Information directly or indirectly concerning the Company or the DIS Group that has not already been disclosed to the public.

5. IDENTIFICATION AND ASSESSMENT OF THE RELEVANCE OF INFORMATION

Inside Information may directly or indirectly concern the Company.

Inside Information that ***directly*** concern the Company may include, for example:

a) ownership structure;

b) composition of management;

c) management incentive plans;

d) auditors' activities;

e) capital transactions;

f) issuance of Financial Instruments;

g) characteristics of the issued Financial Instruments;

h) acquisitions, mergers, demergers, etc.;

i) restructuring and reorganization;

j) transactions involving Financial Instruments;

k) buy-backs and accelerated book-building ;

l) insolvency proceedings;

m) legal disputes;

n) revocation of bank credit lines;

o) write-downs/write-ups of assets or financial instruments in the portfolio;

p) patents, licenses, rights, etc.;

q) insolvency of major debtors/supplier;

r) destruction or damage to uninsured assets;

s) purchase or sale of assets;

t) business performance;

u) changes in expected accounting results for the period (profit warnings and earnings surprises);

v) receipt or cancellation of important orders;

w) entry into (or exit from) new markets;

x) changes in investment plans;

y) changes in the dividend distribution policy;

Meanwhile, Inside Information that indirectly concern the Company may include, for example:

a) data and statistics released by public institutions;

b) upcoming publication of reports by rating agencies;

c) upcoming publication of research by financial analysts;

d) investment recommendations and suggestions on the value of Financial Instruments;

e) central Bank decisions on interest rates;

f) government decisions on taxation, sector regulation, debt management, etc.;

g) decisions by public authorities and local government;

h) decisions relating to changes in the rules governing the definition of market indices and, in particular, their composition;

i) decisions on the microstructure of trading venues; for example, changes in the market segment in which the issuer's shares are traded or changes in trading arrangements or a change in market makers or trading conditions;

j) decisions by supervisory or antitrust authorities.

The assessment of the privileged nature of the information and, therefore, of the need to disclose it to the public or – in cases where the Relevant Regulations allow it, to Delay such disclosure – is carried out by the FGIP in accordance with the criteria set out in the Operating Procedure, provided that this is done within the time limits set out in the Relevant Regulations. The FGIP may be assisted by the Investor Relations Manager, the CFO, and the International Corporate & Legal Affairs department. Such assessment must be communicated to the Legal Representative within 24 hours of their completion.

6. INTERNAL MANAGEMENT OF INFORMATION

The internal management of Inside Information must be consistent with the following rules:

a) each Recipient of this Regulation must comply with the provisions of the Operating Procedure for the management of Inside Information.

b) persons who become aware of Inside Information will be automatically informed of their possible registration in the Insider List by means of a communication specifying the obligations arising from having access to Inside Information and the penalties provided for in the event of unauthorized disclosure or misuse of such information.

Recipients in possession of Inside Information are not authorized to reveal, disclose, or communicate in any way

such Inside Information to persons other than those to whom they need to communicate it in order to perform their duties within and for the Company or the DIS Group.

7. SELECTIVE COMMUNICATION

The Company, through its Legal Representative, may communicate Inside Information (in cases where this is permitted and the Delay procedure has been initiated, if applicable) on a confidential basis and in compliance with the Relevant Regulations, to the following natural or legal persons:

a) the controlling shareholder;

b) the advisors of the Company or the DIS Group and any other person involved or potentially involved in matters of interest to the Company;

c) the auditing firm appointed to audit the accounts of the Company and the DIS Group;

d) legal entities with which the Company or the DIS Group is negotiating or intends to negotiate any commercial, financial, or investment transaction (including potential purchasers of its financial instruments);

e) banks, financial institutions, and rating agencies;

f) any institutional or regulatory body or authority (such as CSSF, Consob, Borsa Italiana, Luxembourg Stock Exchange).

Before disclosing Inside Information, the Company must obtain from the aforementioned persons (unless already provided in their contract or role) a statement in which they undertake the obligation to keep such Inside Information confidential and to take all necessary precautions to ensure its confidentiality and segregation, and in which they acknowledge their awareness that they are not permitted to trade on the markets in Financial Instruments or related instruments to which the Inside Information refers until such Inside Information has been made public.

8. DISCLOSURE OF INSIDE INFORMATION

The timely disclosure of the Company's Inside Information is the responsibility of the Legal Representative, who shall make use of the Investor Relations Manager delegated for this purpose from time to time.

References: European Market Abuse Regulation

The assessment of the relevance for the purposes of disclosure to the public shall be carried out in accordance with the provisions of this Regulation, the Operating Procedure, and on the basis of any additional procedures adopted by the Company for the purposes of issuing press releases, in agreement with the persons mentioned in such information and with the Relevant Regulations.

Following the assessment, where the conditions for Delay do not apply, the Inside Information must be disclosed to the public in accordance with the Relevant Regulations and Operating Procedure. The Company discloses Inside Information to the public in the manner and within the time limits required by the Relevant Regulations and in accordance with the principles of fairness, completeness, clarity, transparency, timeliness, traceability, consistency, and uniformity, as well as equal access to information and information symmetry, ensuring rapid, free, simultaneous, non-discriminatory access that is reasonably suitable for ensuring the effective dissemination of the Inside Information.

Press releases must be issued promptly (in particular, the Board of Directors must ensure that the press release is normally issued immediately after the resolution has been approved, if necessary after suspending the board meeting).

The Company must post and maintain on its website, for a period of at least five years, all Inside Information that it is required to disclose to the public. Furthermore, it may not combine the disclosure of Inside Information to the public with the marketing of its activities.

9. DELAY IN THE PUBLIC DISCLOSURE OF INSIDE INFORMATION

Pursuant to Article 17, paragraph 4 of the MAR, the Company may delay, under its own responsibility, through its Legal Representatives, the disclosure of Inside Information to the public, provided that:

a) immediate disclosure would be likely to prejudice the **legitimate interests of the Company**;

b) the delay in disclosure would be unlikely to **have the effect of misleading the public**[2];

[2] This item b) corresponds to the current applicable Article 17, paragraph 4, letter b) of the MAR. Such Article 17, paragraph 4, letter b) of the MAR will be amended as follows with effect from June 5, 2026: "*the inside information that the issuer or participant in the emissions allowance market has the following meaning to delay disclosing* ***does not conflict with the latest information disclosed to the public or with any other type of communication by the issuer*** *or participant in the emissions allowance market* ***in relation to the same matter to which the inside information*** *refers";* this amendment and the reference to the new ESMA

c) the Company is able to ensure the **confidentiality of such information**.

In the case of a protracted process, which occurs in stages and is aimed at achieving or involving a particular circumstance or event, the Company may, under its own responsibility, delay the public disclosure of Inside Information relating to that process, without prejudice to the aforementioned letters a), b) and c).

If the disclosure of Inside Information is delayed in accordance with paragraph 4 of Article 17 of the MAR and the confidentiality of the Inside Information is no longer guaranteed, the Company shall disclose such Inside Information to the public as soon as possible. This includes situations where rumors explicitly refer to Inside Information whose disclosure has been delayed in accordance with paragraph 4 of Article 17 of the MAR, when such rumors are sufficiently accurate to indicate that the confidentiality of such Information is no longer guaranteed (Article 17, paragraph 7 of the MAR[3]).

Considering that the Company intends to limit the delayed disclosure to the market to exceptional cases, if it intends to exercise this power, the following rules must be complied with:

1. the assessment of the need for an important circumstance that may allow a delay in the disclosure of Inside Information concerning the Company or its Subsidiaries, if the decision is not taken by the Board of Directors, will be carried out by the FGIP, with the support of the International Corporate & Legal Affairs department where requested;
2. the assessment shall be carried out in accordance with the Relevant Regulations in force and with the Operating Procedure on the basis of all available information, data, and circumstances. Such a decision shall be made in writing, citing the reasons and assessments supporting it, and shall be kept, duly signed, with the corporate documents; and
3. Inside Information whose disclosure is delayed must be kept strictly confidential; the disclosure of Inside

guidelines and Commission delegated acts may be included in this Regulation by the Chief Executive Officer or the Chairman of the Company upon their entry into force, replacing the previous provisions and guidelines

[3] Article 17, paragraph 7, of the MAR and therefore this paragraph of the Regulation will be amended and restated as follows with effect from June 5, 2026: "*Where disclosure of inside information has been delayed in accordance with paragraph 4 or 5, or where inside information relating to intermediate steps in a protracted process has not been disclosed in accordance with paragraph 1, and the confidentiality of that inside information is no longer ensured, the issuer or the emission allowance market participant shall disclose that inside information to the public as soon as possible. This paragraph includes situations where a rumour explicitly relates to inside information the disclosure of which has been delayed in accordance with paragraph 4 or 5, or to inside information related to intermediate steps in a protracted process that has not been disclosed in accordance with paragraph 1, where that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured*".

References: European Market Abuse Regulation

Information for which the Company (and its Subsidiaries) is unable to guarantee confidentiality cannot be delayed and, in particular:

a. access to such Inside Information must be prohibited to persons other than those who "need to know" it in order to perform their professional duties within the Company and its Subsidiaries, who will have been previously identified and registered in the Insider List;
b. it must be ensured that persons who have access to such Inside Information recognize their obligations and are aware of the possible penalties for misuse or unauthorized disclosure of such Inside Information, by means of a reminder sent at the time of registration in the Insider List.

In all cases of Delay in the disclosure of Inside Information to the market, and if, in accordance with legal and regulatory *standards*, the Company has obtained authorization to repurchase its own shares, the Chairman or the Chief Financial Officer or the Chief Executive Officer shall block the tradability of such treasury shares until the market receives notification of the aforementioned Inside Information, the disclosure of which had been delayed unless it falls within the "*safe harbours*" referred to in the Relevant Regulations and Operating Procedure; such suspension shall also be imposed on the trading of securities other than Financial Instruments to which the aforementioned Inside Information refers.

Immediately after the publication of the Inside Information subject to Delay, the Company shall notify Consob and CSSF that the information just published was subject to Delay and shall provide, if required by such regulatory authority, a written explanation of how the conditions for Delay of public disclosure were met, as well as the following information:

a) company's details;
b) identity of the notifying person: first name, last name, position at the Company and/or in the Subsidiary;
c) contact details of the notifying person (business email address and telephone number);
d) identification of the Inside Information affected by the Delay in publication (title of the press release; reference number, if assigned by the system used to publish the Inside Information; date and time of disclosure of the Inside Information to the public);
e) date and time of the decision to delay the disclosure of the Inside Information;

f) identity of all persons responsible for the decision to delay the disclosure.

The notification to Consob should be sent to the email adress **consob@pec.consob.it**, specifying "Divisione Mercati" as the recipient.

The notification is required to be filed with the CSSF through eRIIS, using the form "**MAR-5**". If the Company has no access to eRIIS, the notifications are allowed to be sent to market.abuse@cssf.lu, it being specified that the CSSF recommends protecting the relevant documents by a password that is submitted to the CSSF via a separate channel. The Legal Representative responsible for the notification shall transmit the report to the Board of Directors, which shall ensure its retention at the Company's registered office.

The above notification is not required if, after the decision to delay publication, the information is not disclosed to the public because it has lost its privileged nature.

By way of a non-exaustive example, in accordance with the ESMA guidelines on the delay in disclosure of inside information, published on July 13, 2016, for the purposes referred to in letter (a) of Article 17(4) of the MAR, the following may generally be considered as **legitimate interests of issuers**:

a. the issuer is conducting negotiations whose outcome could be prejudiced by immediate disclosure to the public. Such negotiations may relate, for example, to mergers, acquisitions, demergers and spin-offs of companies, acquisitions or disposals of major assets or business units, restructuring and reorganization;
b. the issuer's financial sustainability is in serious and imminent danger, even if not falling within the scope of applicable bankruptcy law, and immediate disclosure of the inside information to the public would seriously harm the interests of existing and potential shareholders, compromising the conclusion of negotiations aimed at ensuring the issuer's financial recovery;
c. the Inside Information relates to decisions taken or contracts concluded by the management body of an issuer which, under national law or the issuer's articles of association, require the approval of another body of the issuer, other than the general meeting of shareholders, in order to become effective, provided that:
    i) immediate disclosure of the information to the public before such final decisions are taken could prejudice the proper assessment of the information by the public; and
    ii) the issuer has arranged for the final decision to be taken as soon as possible;

d. the issuer has developed a product or invention and immediate disclosure of that information to the public could prejudice its intellectual property rights;
e. the issuer is considering acquiring or disposing of a significant interest in another company and disclosure of that information could jeopardize the implementation of that project;
f. a previously announced transaction is subject to the approval of a public authority and such approval is conditional upon the fulfillment of additional requirements, where immediate disclosure of such requirements to the public could affect the issuer's ability to fulfill them and therefore jeopardize the ultimate success of the agreement or transaction;.

For the purposes of letter (b) of Article 17(4) of the MAR, situations in which a delay in the disclosure of Inside Information could have the **effect of misleading the public** include at least the following circumstances:

a. the Inside Information that the issuer intends to delay disclosing is substantially different from the issuer's previous public announcements regarding the matter to which the Inside Information relates; or
b. the Inside Information that the issuer intends to delay disclosing relates to the issuer's financial targets, which may not be achieved if disclosed in advance; o
c. the Inside Information that the issuer intends to delay the disclosure of is contrary to market expectations, where the latter are based on signals that the issuer has previously sent to the market, such as interviews, roadshows, or any other type of communication organized by the issuer or with its approval.

The above conditions apply, at the time of approval of this Regulation, also in the case of information relating to

protracted processes[4][5].

10. INFORMATION FLOW FROM SUBSIDIARIES

This Regulation also applies to Subsidiaries.

For this reason, in order for DIS to properly manage Inside Information originating from Subsidiaries, it is necessary to ensure a flow of information from the latter to DIS itself.

However, the management of information flows that may be of a privileged nature originating within DIS Group companies and, therefore, the methods of transmitting such information to the FGIP for evaluation, varies depending on the position held by the Subsidiary within the DIS Group. In any case, the methods of transmission to FGIP, assisted, where requested, by the International Corporate & Legal Affairs department, must take into account the need to communicate the aforementioned information to DIS as quickly as possible also taking into account what is provided for in the Operating Procedure. This is for the purpose of activating any information

[4] Starting June 5, 2026, the amendments to Article 17 of the MAR will come into effect, and this Regulation may be supplemented and amended accordingly by the Chairman or Chief Executive Officer to reflect those modifications to Article 17 of the MAR:

The new first paragraph of Article 17 of the MAR will be supplemented as follows: "*The issuer shall disclose to the public, as soon as possible, inside information which directly concerns that issuer. This obligation shall not apply to inside information relating to the intermediate stages of a prolonged process referred to in Article 7(2) and (3), if those stages are linked to the materialization or determination of particular circumstances or a particular event. In a protracted process, only the final circumstances or event shall be disclosed, as soon as possible after they occur.*"

New paragraph 1a will be inserted in Article 17 of the MAR: "*1a. The issuer shall ensure the confidentiality of information that meets the criteria set out in Article 7 regarding inside information until such information is disclosed in accordance with paragraph 1 of this Article.*"

New paragraph 4a will be inserted in Article 17 of the MAR: "*4a. Failure by an issuer to disclose inside information relating to the intermediate stages of protracted processes in accordance with paragraph 1 shall not be subject to the obligations set out in paragraph 4.*"

[5] At the time of approval of this procedure, paragraphs 11 and 12 of Article 17 of the MAR was amended as follows: "*11. ESMA shall issue guidelines to establish a non-exhaustive indicative list of the legitimate interests of issuers, as referred to in paragraph 4, first subparagraph, point (a).*
12. The Commission shall be empowered to adopt a delegated act to set out and review, where necessary, a non-exhaustive list of the following:
(a) final events or final circumstances in protracted processes and, for each event or circumstance, the moment when it is deemed to have occurred and is to be disclosed pursuant to paragraph 1; (b) situations in which the inside information that the issuer or the emission allowance market participant intends to delay is 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 the inside information refers, as referred to in paragraph 4, first subparagraph, point (b).'
With reference to letter (b), on May 7, 2025, ESMA submitted to the Commission the Final Report on Technical advice concerning MAR and MiFID II SME GM, which provides: "*For the purposes of the non-exhaustive list of situations in Annex II of this Regulation, the following types of communication by the issuer shall be deemed relevant: a) any communication or press release published by the issuer, including via media, social media, and on the issuer's website; b) public interviews delivered by any person representing the issuer; c) publicly accessible pre-close calls, roadshows, and other public events, including webinars and podcasts, organized or authorized by the issuer, or to which any person representing the issuer takes part; d) advertising and marketing campaigns made public by the issuer; e) publicly accessible regulatory filings by the issuer; f) publicly accessible communications delivered in the context of the issuer's shareholders' meetings; g) any other communication to the public delivered by any person representing the issuer.*"

segregation measures and promptly executing all the requirements set forth in this Regulation and the rules provided for in the Relevant Regulations.

11. SANCTIONS

The Recipients of this Regulation, as well as those involved in any capacity in their implementation and related activities, are required to comply with them and with the provisions of the Relevant Regulations in force at the time and the obligations imposed by these Relevant Regulations and, as regards the companies of the d'Amico Group that have adopted it, the rules and principles of conduct set out in the "Organizational, Management, and Control Model" pursuant to Legislative Decree 231/2001 (the "Decree 231").

Violation of the Relevant Regulations and/or the obligations imposed by this Regulation will result in the application of the relevant sanctions, namely:

- the configuration, with regard to the individuals who committed the offense, of an offense punishable by criminal and/or administrative sanctions pursuant to applicable national regulations, the TUF, and in compliance with the MAR and other applicable European regulations;
- the administrative liability of the Company and/or its Subsidiaries in accordance with the provisions of national legislation, the TUF and Decree 231, as applicable, and in compliance with the MAR and current European legislation.

Violations of this Regulation, the Operating Procedure and the Relevant Regulations will result in the application of disciplinary sanctions and the adoption of measures provided for by labor contract regulations against the person responsible by the Company and/or its Subsidiaries, each within its own sphere of competence, and in particular:

- for employees, the disciplinary sanctions provided for by current legislation will be applied;
- for external collaborators and/or consultants, the necessary steps will be taken to terminate the existing relationship due to breach of contract;
- for directors, the Company's Board of Directors may propose dismissal for just cause.

In the event that, due to a violation of the provisions on corporate disclosure resulting from non-compliance with the provisions of this Regulation, the Company incurs administrative pecuniary sanctions, the Company will also

take action/shall also take recourse against the individuals for such violations in order to obtain reimbursement of the costs relating to the payment of such sanctions.

Violations of the provisions of this Regulation, even if it does not result in conduct sanctioned by the judicial authorities or other competent authorities, may nevertheless result in serious harm to the Company, including reputational damage, with significant economic and financial consequences. Accordingly, the individual responsible for such breach shall be held fully liable towards the Company for any and all damages of whatever nature incurred by the Company as a consequence of the violation.

The body responsible for taking appropriate measures in the event of violations of this Regulation is the CEO of the Company or, in the event of his or her absence, the person delegated by him or her. If the violation is committed by the CEO, the body responsible for taking appropriate measures is the Board of Directors of the Company, and the CEO may not participate in the deliberation on sanctions. If the majority of the members of the Company's Board of Directors have participated in the violation, the body responsible for taking the appropriate measures shall be the Company's Supervisory Body.

12. AMENDMENTS

This Regulation, its Annex and Operating Procedure, apply with effect as of November 6 2025 and replace previous internal regulations.

Should it be necessary to amend the provisions of this Regulation as a result of changes in applicable laws or regulations (including Consob and CSSF circulars), at the request of the competent authorities or as required by experience or market practices, this Regulation must be amended by resolution of the Board of Directors, unless the amendment is purely formal or aimed at a better understanding, in which case it may be made by the Chairman or the Chief Executive Officer, with subsequent ratification and acknowledgment by the Board of Directors at its next meeting[6].

The update of this Regulation or the Operating Procedure will then be promptly communicated to the Recipients.

The personal data of the Recipients will be processed in accordance with the terms and for the purposes of fulfilling

[6] As already provided for additions and/or amendments that will come into force on June 5, 2026, following the entry into force of EU Regulation 2024/2809.

References: European Market Abuse Regulation

the obligations set forth in the Regulation and in the laws and regulations in force. The provision of such data by the data subjects is mandatory in order to fulfill the obligations in question.

References: European Market Abuse Regulation

KEEPING AND UPDATING OF THE INSIDER LIST

Annex A of the Internal Regulation Governing Inside Information
(version approved by the Board of Directors on November 6 2025)

References: European Market Abuse Regulation

INDEX

References: European Market Abuse Regulation

1. PREMISES AND PURPOSE

The Company, in accordance with the Relevant Regulations, is required to adopt an Insider List, update it, and keep it for at least five years from its creation or update, adopting organizational measures to regulate the entire registration and communication process, ensuring that registered individuals acknowledge their obligations in writing in a documentable form.

In compliance with this obligation and in order to regulate the keeping of the Register, the Company has approved this document.

2. DEFINITIONS

Unless otherwise provided for herein, all capitalized terms used shall have the same meaning as set out in the Internal Regulation Governing Inside Information of the Company to which it is attached as Annex A

3. REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION

3.1. Structure of the Insider List

The Insider List enlists all those who (i) have access to Inside Information; (ii) and who are working for those who have access to such information under a contract of employment, or otherwise performing tasks through which they have access to inside information, such as advisers, accountants or credit rating agencies ; and (iii) with whom there is a professional relationship, whether it be an employment contract or of another nature, or who in any case perform tasks by virtue of which they have access to Inside Information (the "**Person(s)**" or the "**Insider**").

The Insider List is maintained and updated in accordance with the timing and procedures required by the Relevant Regulations and includes the following Insider data:

- first and last name;
- date of birth;
- national identification number (if applicable);
- the role held by such Persons in the Company and the reason for access to Inside Information;
- name of the company to which they belong and registered office;
- business and personal telephone numbers;
- full home address (if available at the time of the request by the competent authority);
- section of the Insider List (Occasional Section (I) or Permanent Section (II));

- name of the Inside Information relating to an Occasional transaction or event;
- date and time when the Inside Information is identified;
- date and time when the Persons have access to the Inside Information;
- date and time when the Persons are identified as permanent Persons;
- date and time when the Insider List Manager is notified that such Persons have had access to Inside Information;
- date of entry in the Insider List.

The Insider List is divided into separate sections: (i) a section I for each piece of Inside Information, indicating the date and time when the information became Inside Information, the date and time when the Company decided on it, and the identity of the persons who made the decision or participated in its formation (the "**Occasional Section**"), and (ii) a section II containing the details of the Persons who always have access to all Inside Information (the "**Permanent Section**")[7].

The Company updates the relevant section of the Insider List in the following circumstances: (a) if the reason for the Person's inclusion in the section changes; (b) if a new Person has access to Inside Information; and (c) if a Person listed in the section no longer has access to Inside Information.

3.1.1. Occasional Section

Each Occasional Section only contains the details of Persons who have access to Inside Information as identified by the Company. If the Inside Information concerns a protracted process taking place in several stages, the Occasional Section refers to all stages of the process that are relevant from the point of view of their specific price sensitivity[8].

[7] The Listing Act provides that the European Securities and Markets Authority (ESMA) shall review the implementing technical standards (ITS) relating to the insider register, with the aim of extending the simplified format, hitherto reserved for issuers on growth markets for SMEs, to all issuers. ESMA has published the Final Report on the matter. This document may be updated once the new technical standards have been issued.

[8] As of June 5, 2026, Article 17 of the MAR will be amended as follows, and this chapter may be supplemented with the new regulations by the Chairman or Chief Executive Officer: this Annex A new first paragraph of the Article 17 of the MAR . "*An issuer shall inform the public as soon as possible of inside information which directly concerns that issuer. That requirement shall not apply to inside information related to intermediate steps in a protracted process as referred in Article 7(2) and (3) where those steps are connected with bringing about or resulting in particular circumstances or a particular event.*"

References: European Market Abuse Regulation

The Occasional Section of the Insider List may include, subject to the conditions set out in the Relevant Regulations, by way of example and if not already included in the Permanent Section:

a) members of the Board of Directors, members of the supervisory body, executives, employees, and collaborators of the Company who, in relation to specific activities carried out, have access to specific Inside Information;

b) external consultants (the "**Consultants**") who:

   i) provide their professional services on the basis of a consultancy or paid service relationship as:

      - legal, tax, business, financial, and accounting consultants, including the auditing firm appointed to audit the accounts of the Company;
      - banks that organize and implement financing programs for the Company whose existence is relevant to the financial stability of the Company itself or that also involve the provision of consulting services, such as structured financing, debt restructuring financing, and financing related to other extraordinary transactions;
      - authorized entities acting as members of placement and underwriting consortia for the issuance of financial instruments, excluding ordinary trading activities in the context of the provision of brokerage services; and
      - entities acting as *sponsors*, *specialists*, or *nomads* when their activities require access to Inside Information;

   ii) have access to specific Inside Information (e.g., in relation to a specific acquisition or disposal transaction[9])

New paragraph 1a will be inserted in Article 17 of the MAR: "*1a. The issuer shall ensure the confidentiality of information which meets the criteria of inside information as referred to in Article 7, until such time as that information is disclosed pursuant to paragraph 1 of this Article.*"

In Article 17, paragraph 4 of the MAR, subparagraph 4a was then added: "*Non-disclosure by an issuer of inside information related to intermediate steps in protracted processes, in accordance with paragraph 1, is not subject to the requirements laid down in paragraph 4.*"

[9] Pursuant to the Relevant Regulations, the details of any counterparties are not included in the Insider List, unless they receive Inside Information.

c) entities that have a professional relationship with a Subsidiary and have access to specific Inside Information[10];

d) credit rating agencies.

If the Person who has a professional relationship with the Company is a company, association, or other entity, the Company shall indicate in the Occasional Section of the Insider List only the details of the relevant natural persons who, to its knowledge, have access to Inside Information in accordance with the provisions of the Relevant Regulations.

If the Company decides not to delay the publication of Inside Information, the Insider List shall indicate the Persons who had access to the Inside Information during the period between the time the information was classified as Inside Information and the time the information was published in accordance with the Operating Procedure.

3.1.2. Permanent Section

The details of Persons registered in the Permanent Section must not be included in the Occasional Sections. Persons who, due to the nature of their function or position, always have access to all Inside Information, based on the Company's assessment and in accordance with the Relevant Regulations and the relevant internal operating procedure, may be registered in the Permanent Section of the Insider List, provided that the conditions set out in the Relevant Regulations are met.

3.2. How the Insider List is kept

The Insider List is kept in electronic format and protected by adequate security systems and access filters, such as firewalls, recovery systems, and access credentials, in accordance with current regulations on security and data protection.

The International Corporate & Legal Affairs department of the Company is responsible for keeping the Insider List via a secured electronic platform, which is provided by an external provider (the "**Platform**"), that, for this purpose, created a dedicated email address: idc@damicoship.com.

[10] Pursuant to the Relevant Regulations, Subsidiaries are not required to keep their own register.

References: European Market Abuse Regulation

In addition to the functions identified in the Regulation and the related Operating Procedure, the Insider List Manager, in agreement with the FGIP, oversees the criteria and methods to be adopted for the keeping, management, and searching of the information contained in the Insider List, in order to ensure easy and timely access, management, consultation, extraction, printing, and transmission to the competent authorities in accordance with the Relevant Regulations. The electronic format of the Insider List guarantees at all times:

- the confidentiality and security of the information contained therein, ensuring that access to the Insider List is limited to clearly identified persons who, within the Company or any other entity acting in the name or on behalf of the Company, need to access it due to the nature of their respective function or position;
- the accuracy of the information contained in the Insider List;
- access to and retrieval of previous versions of the Insider List.

Recipients must inform the relevant FOCIP or FGIP of any information deemed to be privileged that they have become aware of for work reasons or in connection with the performance of their professional activities or in the exercise of their functions, providing a brief explanation of the declared relevance of the information and/or event.

The FGIP shall assess the privileged nature of the information, in accordance with the Relevant Regulations, on the basis of the documentation and any other information available to it or to the FOCIP.

The FGIP, with the support of the concerned FOCIP, is required to communicate, as soon as the privileged nature of the Inside Information has been assessed, the identity of the persons who have access to such information to the Insider List Manager, who will send an email to idc@damicoship.com for the purpose of their registration in the Insider List.

The Insider List must be updated promptly by the Insider List Manager:

- if there is a change in the reason why the Person was registered in the Insider List, including in the event that the Person's registration must be moved from one section of the Insider List to another;
- if a new Person must be registered and, therefore, added to the Insider List;
- if it is necessary to note that a Person registered in the Insider List no longer has access to Inside Information, specifying the date from which such access no longer applies. In this regard, the note is made if the reason for the registration no longer applies, including if the Inside Information becomes public knowledge or, in any case, loses its privileged nature.

Each update indicates the date and time when the change triggering the update occurred.

References: European Market Abuse Regulation

The Insider List Manager, informed by the FGIP, also through the authorized FOCIP manager, of any Persons not registered in the Occasional Section of the Insider List who have or have had access to specific Inside Information (possibly upon notification by the Persons themselves), shall update the Insider List.

When the Inside Information ceases to be privileged, the Company indicates this circumstance in the Occasional Section as indicated above and promptly informs the Persons indicated in accordance with the procedures indicated in the following paragraphs.

Information relating to Persons registered in the Insider List is kept by the Company for a period of at least five years after it is drawn up or updated.

For the purposes of establishing and updating the Insider List, the Insider List Manager shall collect and update information concerning the Persons to be registered or registered in the Occasional Sections and in the Permanent Section.

At the same time as a Person is registered in the Insider List, the Insider List Manager, through the Platform provided by the external service provider, shall automatically inform them:

- of their registration in the Insider List;
- of the obligations arising from having access to Inside Information; and
- of the penalties for committing the offenses of misuse of Inside Information and unlawful disclosure of Inside Information.

The Insider List Manager shall take all reasonable measures to ensure that Persons registered in the Insider List acknowledge, via the Platform, the above obligations and penalties.

Registration in the Insider List shall be communicated to the Person concerned at the time of registration. To this end, the Platform will automatically generate a notification message to the person concerned, providing proof of delivery, accompanied by a specific information notice (including the information notice provided pursuant to Regulation (EU) 2016/679, "**Information Notice**"), and the Insider will automatically acknowledge receipt of this message. The Insider may also modify the information concerning him/her and, by responding automatically, ensure that the Insider List is updated.

Any updates concerning them will also be communicated to Persons already registered in the Insider List, with an automatic notification message guaranteeing proof of delivery to the data subject, drawn up in accordance with the models provided for by the Relevant Regulations.

The Platform keeps a copy of the communications sent on a durable medium to ensure proof and traceability of compliance with the disclosure obligations.

Where requested by Consob and/or CSSF, the Company shall transmit to Consob and/or CSSF the Insider List or the specific sections indicated in the request, in the manner provided for by Consob and/or CSSF.

3.3. Obligations of Persons listed in the Insider List

Persons listed in the Insider List shall take appropriate measures to prevent access to Inside Information by persons other than those who need it for the normal performance of their employment, profession, or duties. In particular, in order to ensure confidentiality, they shall:

- acquire, manage, and store Inside Information (i) only to the extent strictly necessary and sufficient to perform the tasks assigned to them and for the time strictly necessary to do so, ensuring its timely archiving as soon as the specific need for which the Inside Information was acquired has ceased; (ii) in accordance with the common rules of prudence and professional diligence and with the utmost confidentiality; and (iii) in such a way as to prevent unauthorized third parties from gaining knowledge of the Inside Information and to prevent access to persons other than those who need it for the normal exercise of their occupations, professions, or functions;
- to identify, to the best of their knowledge: (i) which other persons within their own structure and/or corporate function of the Company or the DIS Group, or within their own third-party structure outside the DIS Group, have access to the Inside Information; (ii) third parties who have a working relationship with the DIS Group or with their own third-party structure outside the DIS Group and who may have access to Inside Information through them or who no longer have Inside Information;
- promptly communicate the names and details of the persons identified in accordance with point b) above to the Insider List Manager, who shall, where appropriate, promptly update the Insider List.

The Consultants undertake specific confidentiality commitments regarding the acquisition, management, and storage of Inside Information, undertaking to comply strictly with the Relevant Regulations.

3.4. Penalties

Without prejudice to the Company's right to seek compensation for any damage and/or penalties that may arise from conduct in violation of the obligations set out in this document, such non-compliance will give rise to the

liabilities provided for in the Relevant Regulations and any other applicable provisions and may result in the penalties referred to in the Regulation.

3.5. Subsidiaries

Subsidiaries, pursuant to the Relevant Regulations, are not required to keep their own Insider List. Therefore, through the FOCIP or their Chief Executive Officer, they shall communicate to FGIP the specific relevant information for the Company generated within the Subsidiary for the purpose of assessing the privileged nature of the information. Subsequently, the Subsidiaries must notify the FGIP of the persons who will have access to Inside Information for the purposes of immediate registration, by the Insider List Manager, in the appropriate sections of the Insider List.

The disclosure to the public of information concerning the Subsidiaries is always carried out by the Company, in accordance with the procedures laid down by current legislation; Subsidiaries must refrain from independently disseminating and/or communicating Inside Information externally.

If the Company decides to exercise its right to delay the dissemination of Inside Information, FGIP shall immediately inform the Subsidiary so that it can take the appropriate precautions to:

- prevent access to such Inside Information by persons other than those registered in the Insider List;
- take all possible precautions and measures to ensure the confidentiality of Inside Information;
- ensure that persons who have access to such Inside Information have assumed all legal and regulatory obligations arising therefrom and are aware of the possible penalties in the event of misuse or unauthorized disclosure of Inside Information, by sending the appropriate information at the time of registration in the Insider List.

The Subsidiary is required to inform FGIP without delay if it is no longer able to guarantee the confidentiality of Inside Information whose disclosure is to be delayed or has been delayed, or if confidentiality has been breached, so that the Company can promptly disclose the aforementioned information to the market in accordance with the procedures set out in the Relevant Regulations.