Ferretti S.p.A.

PROCEDURE FOR THE MANAGEMENT AND DISSEMINATION OF INSIDE INFORMATION

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1. PURPOSE

This procedure was approved by the Board of Directors on 20 March 2023, (and, most recently, updated on 27 October 2026), upon the Chief Executive Officer's proposal, for the purpose of complying with the applicable laws and regulations, including those enacted by the European Union in force from time to time, regarding the abuse of inside information, as described below (the "**Inside Information Procedure**" or the "**Procedure**").

The Inside Information Procedure regulates (i) the identification, internal management and public disclosure of inside information regarding Ferretti S.p.A. ("**Ferretti**" or the "**Company**") and/or Ferretti's subsidiaries (the "**Subsidiaries**"), in order to guarantee the confidentiality of inside information and the correct external disclosure thereof, and (ii) the establishment and updating of the register of persons having access to inside information.

This Procedure shall come into effect as of the date of filing with Borsa Italiana S.p.A. ("**Borsa Italiana**") of the application for admission to trading of the Company's shares on Euronext Milan, a market organised and managed by Borsa Italiana.

Any subsequent amendments and/or supplements shall come into force on the day of publication of the Procedure on the Company's website, or on the day otherwise provided for by law or regulation or by a resolution of the Board of Directors, or, in cases of urgency, by the Chairman of the Board of Directors or by an executive director.

2. SCOPE OF APPLICATION

2.1 The Inside Information Procedure applies, with binding effect, to: (i) members of the administrative, management and control bodies of the Company and Subsidiaries; (ii) others top managers who, even though they are not members of the bodies referred to in the previous point, have regular access to Inside Information, as defined below, that directly or indirectly concerns these entities and have the power to make management decisions that might affect the future development and prospects of these entities; and (iii) all the other employees of the Company's and its Subsidiaries, as well as the external parties who, due to their work or professional activity, have access to inside information concerning Ferretti and/or its Subsidiaries (together, the "**Recipients**" and each, individually, a "**Recipient**"), as well as the Company's competent functions responsible for the Procedure.

2.2 The Inside Information Procedure also applies as an instruction to all Subsidiaries, which are required to: (i) ensure that the Recipients belonging to their organization or appointed by it to act comply with the Procedure and (ii) promptly provide Ferretti with all the necessary information to comply with the disclosure obligations required under current legislation and, more generally, to implement the provisions contained in the Procedure.

3. REFERENCES

The provisions contained in the Inside Information Procedure refer to the following laws and regulations, guidelines and principles:

a) Legislative Decree No. 58 of 24 February 1998, the Italian Consolidated Finance Act (the "**TUF**"), and subsequent amendments;

b) Regulation approved by Consob with Resolution No. 11971, concerning issuers, and subsequent amendments;

c) Regulation (EU) No. 596/2014, Implementing Regulation (EU) 2026/1291, Delegated Regulation (EU) 2026/789, Delegated Regulation (EU) No. 522/2016, and Implementing Regulation (EU) 1055/2016 (the "**MAR Regulation**");

d) "Guidelines on the Market Abuse Regulation" published by ESMA;

e) Guidelines issued by Consob on 13 October 2017 on the "Management of Inside Information" (No. 1/2017; the "**Consob Guidelines**");

f) Consob Communication No. 0061330 of 1 July 2016;

g) Regulations and instructions of Borsa Italiana S.p.A.;

h) Corporate Governance Code for listed companies, to which Ferretti adheres;

i) Code of Ethics of Ferretti and its subsidiaries;

j) principles established by Ferretti regarding internal control.

4. CONFIDENTIALITY

4.1 Without prejudice to the additional safeguards concerning the processing of Relevant Information, as well as the disclosure of Inside Information (as defined in Article 5 below,) established by this Procedure, the Recipients shall keep confidential all information of which they have become aware in performing their work or in performing their duties or assignments and process such information with the necessary precautions, so that unauthorised parties cannot become apprised of this information.

The Recipients shall manage the paper and electronic documents containing the aforementioned information so as to make the confidential nature thereof recognisable. Access to the media shall be controlled and protected in the manner deemed most appropriate each time, with available – also IT- tools. Each Recipient shall ensure that the media for which it is responsible is traceable.

4.2 The Recipients are prohibited from:

a) disclosing confidential information with any means to third party, including the Specific Relevant Information (referred to in Article 7 below) and Inside Information, of which they have become aware, if it is not essential for conducting their professions or duties;

b) carrying out directly or indirectly, on their own behalf or on behalf of third parties, purchasing, selling transactions or carrying out , , any other transactions on Ferretti's financial instruments to which the Specific Relevant Information and Inside Information are related;

c) carrying out in the name of and/or on behalf of the Company, purchasing, selling transactions or carrying out, , any nother transactions on Ferretti's financial instruments to which the Specific Relevant Information and Inside Information are related;

d) recommending or inducing others, on the basis of the Specific Relevant Information and Inside Information, to purchase, sell or carry out on their own account or that of third parties, any other transaction on Ferretti's financial instruments to which such Information are related.

5. CONCEPT OF RELEVANT INFORMATION AND INSIDE INFORMATION

5.1 Relevant information is any information or news not yet qualified as Inside Information that the Company considers to be relevant, since it relates to data, events, projects or circumstances which, on an ongoing, repetitive, periodic or sporadic, occasionally, or unforeseen basis, directly or indirectly concern Ferretti and which may, at a later, event imminent, time, assume a privileged nature (the "**Relevant Information**").

5.2 Inside information is an information of a precise nature which has not been made public, and relating, directly or indirectly, to the Company or one or more financial instruments thereof, which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the prices of the related derivative financial instruments (the "**Inside Information**").

5.3 For the purposes of Article 5.2 above, an information is specific if:

a) it indicates a set of circumstances which exists, or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, and

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

5.4 For the purposes of Article 5.2 above, for information that, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the prices of related derivative financial instruments, means an information that a reasonable investor would likely use as a part of the basis of his or her investment decisions.

5.5 In case of a protracted process – meaning a sequence of actions, steps or decisions distributed over time and aimed at achieving a particular objective or result (the "**Protracted Process**") – that is intended to bring about, or that results in, a particular circumstance or a particular event, such future circumstance or future event (each, the "**Final Event**"), and also the intermediate steps of that Protracted Process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

A non-exhaustive illustrative list of Final Events in Protracted Processes and, for each Final Event, of the time at which it is deemed to have occurred and at which it must be disclosed pursuant to Article 9.8 is set out in Annex A to this Procedure. The identification of Final Events for Protracted Processes not included in such list remains subject to a case-by-case assessment, duly reasoned, by the Chief Executive Officer.

An intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria set forth in the preceding paragraphs of this Article. In such case, the provisions of Article 9.8 below shall apply.

6. FUNCTIONS RESPONSIBLE FOR THE PROCEDURE

6.1 Chief Executive Officer of Ferretti (the "**Chief Executive Officer**"), also taking into account the Consob Guidelines, is the function in charge for handling the procedure for the management and dissemination of the Inside Information and, therefore shall:

a) update the Mapping of the Relevant Information (referred to in Article 7.1 below), assessing its adequacy over time;

b) assess the relevant nature of the specific information relating to Ferretti and/or its Subsidiaries, identifying the parties who have access to it;

c) assess the privileged nature of the information relating to Ferretti and/or its Subsidiaries, identifying, including in case of delay, the internal and external parties who have access to Inside Information;

d) assess whether the Inside Information constitutes a one-off event (the "**Single Event**") or a Protracted Process. In the latter case, the Chief Executive Officer shall:

(1) identify, using **Annex A**, the Final Event, as well as the time at which it is deemed to have occurred and at which it must be disclosed pursuant to Article 9 below;

(2) monitor, on an ongoing basis, the stage of development of the Protracted Process and therefore of the intermediate steps composing it up to the Final Event. It being understood that where the intermediate steps of the Protracted Process are in themselves qualifiable as Inside Information, the provisions of Article 9.8 below shall apply;

e) request to the Person in Charge (as defined in Article 14.2 below) to update the RIL and/or the Insider List (as defined in Article 14.1 below);

f) should Inside Information have to be disclosed immediately to the public, disclose this fact to the Finance Department, the Legal Function and the Investor Relator for the purpose of preparing the press release;

g) assess and monitoring the existence of the conditions that allow the Company to avail itself of the possibility of delaying the disclosure of Inside Information and to fulfil the obligations as referred to in Article 13 below;

h) inform, if deemed necessary or appropriate, the persons registered in the Insider List of the names of the other persons registered in the Insider List in connection with the same Inside Information.

6.2 The Legal Function, after having consulted the Finance Department shall:

a) on the basis of the Chief Executive Officer's instructions, update the Mapping of Relevant Information and the RIL, also carrying out the related obligations;

b) on the basis of the Chief Executive Officer's instructions, update the Insider List without delay, also carrying out the related obligations;

c) inform the persons registered in the RIL and/or in the Insider List of the said registration (as well as of the closure thereof);

d) carry out the dissemination to the public as well as the storage and filing the communications relating to Inside Information;

e) monitor relations with Consob, Borsa Italiana and any other relevant authority;

f) in the event of delay in the disclosure to the public of Inside Information, manage the storage of the information referred to in Article 13.3 by means of a document filed in the Company's records;

g) systematically file the documentation relating to the Mapping of Relevant Information, the RIL and the Insider List.

6.3 The Finance Department shall:

a) manage relations with the financial community (*Investor Relations*);

b) manage relations with the press;

c) prepare the contents of the public disclosure of Inside Information (Investor Relations).

7. CIRCULATION AND ASSESSMENT OF THE RELEVANT NATURE OF THE INFORMATION

7.1 The Chief Executive Officer, with the support of the Chief Financial Officer Function, the Finance Department, the Sales Department and Legal Function (together or alternatively between them) identifies and monitors the types of Relevant Information so as to facilitate the identification of Specific Relevant Information (referred to in Article 7.4 below), associating to the aforesaid types of Relevant Information the persons that potentially have access thereto.

The following list initially identifies, by way of example, the types of Relevant Information that could be of interest to the Company (the "**Mapping of Relevant Information**"):

a) ownership structure;

b) the composition of the management, and the management incentive plans (i.e. members of the Company's management bodies and manager with strategic responsibility of the Company, including the terms and conditions of possible severance payment provision);

c) the auditors' activity;

d) transactions on share capital;

e) issuance of financial instruments and relevant features;

f) transactions on financial instruments, buy-back and accelerated book-building;

g) acquisitions, mergers, demergers and other extraordinary transactions;

h) purchase or sale of assets;

i) corporate restructuring and reorganisation activities;

j) insolvency proceedings;

k) legal and tax disputes;

l) bank loans (including the relevant revocation);

m) trademarks, licences, intellectual property rights;

n) new multi-year full-service agreements with national network operators (including renewals);

o) default of important debtors;

p) forecast data/annual and multi-year quantitative objectives and management performance data;

q) changes in expected accounting results (profit warning and earning surprise);

r) entry into (or exit from) new strategic markets or business sectors;

s) receipt or cancellation of important orders; execution or termination of important agreements;

t) amendments to investment plans;

u) dividend distribution policy.

7.2 The Chief Executive Officer, with the support of the corporate functions mentioned in Article 7.1 above, continuously evaluates the adequacy of the Mapping of Relevant Information, amending it where necessary.

The Mapping of Relevant Information, in the version updated from time to time, is kept by the Finance Department and submitted to Ferretti's Top-level Department Managers[1], as well as the directors holding specific offices of the Subsidiaries.

7.3 Ferretti's Top-level Department Managers, as well as the directors holding specific offices of the Subsidiaries, also on the basis of the Mapping of the Relevant Information, whenever they deem it appropriate, in connection with their role , that a specific information, due to the characteristic already in place, may later assume a privilege nature - shall promptly inform the Chief Executive Officer and identify the persons inside and/or outside the company who are aware thereof.

The assessment of the relevant nature of the specific information is carried out by the Chief Executive Officer.

7.4 If, at the end of the aforementioned assessment, the Chief Executive Officer identifies - also with the support of the Chief Financial Officer Function, the Finance Department, the Sales Department, the Investor Relator and the Legal Function (together or alternatively between them)) – a specific relevant information (the "**Specific Relevant Information**"), he shall:

(a) promptly identify the persons who have access to it;

(b) promptly inform the Person in Charge (as defined in Article 14.2 below) about the Specific Relevant Information identified;

(c) disclose to the Person in Charge the names of the persons referred to in letter (a) above.

7.5 On the basis of the information received, the Person in Charge shall promptly set up a specific section in the RIL (as defined in Article 14.1 below) relating to the Specific Relevant Information in compliance with the provisions set out in Article 16.2 below.

7.6 The Chief Executive Officer, with the support of the Ferretti's Top-level Department Managers, monitors the development and circulation of the Specific Relevant Information and ensures that the latter is circulated among the concerned Recipients only on a strictly confidential basis, notifying to the Person in Charge any amendment that is of relevance to updating the RIL.

7.7 With reference to the selective disclosure of the Specific Relevant Information to the third parties, the provisions set out in Article 12.1 below shall apply.

8. INTERNAL CIRCULATION AND ASSESSMENT OF THE PRIVILEGED NATURE OF THE INFORMATION

8.1 Without prejudice to the provisions set out in Article 7.3 above, Ferretti's Top-level Department Managers, as well as the director holding special offices of the Subsidiaries shall inform, without delay, the Chief Executive Officer of all the information to which, on the basis of a reasonable assessment and a preliminary and presumptive judgment, may have privileged nature, to which they have access due to the functions carried out or which has been generated in their organisational unit, identifying the persons who have knowledge thereof.

Functional Responsible who are in possession of or have received from their staff members information which, on the basis of a reasonable assessment and preliminary and presumptive judgment, may have privileged nature, shall inform, without delay, the Manager of a higher level Department until the respective Top-level Department Manager is informed so that the latter can report to the Chief Executive Officer.

[1] "Top-level Department Manager" means the Head or Department Manager reporting directly to the Company's Chief Executive Officer.

8.2 The assessment on the privileged nature of the information and the identification of the persons, inside and/or outside the Ferretti Group, who have access to such information, is carried out by the Chief Executive Officer, who can also avail himself of the support of the Chief Financial Officer Function, the Finance Department, the Sales Department, the Investor Relator and the Legal Function (together or alternatively between them).

8.3 If, as a result of the aforementioned assessment, the Chief Executive Officer believes that the information does not have a privileged nature, shall inform the concerned Recipients, who shall continue to process the information as confidential in accordance with Article 4 above.

8.4 If, as a result of the aforementioned assessment, the Chief Executive Officer believes that the information has a privileged nature, shall inform the Person in Charge (as defined in Article 14.2 below) so that the latter can set up without delay a specific section of the Insider List (as defined in Article 14.1 below) concerning the Inside Information, in accordance with the provisions set out in Article 18.2 below.

The Person in Charge, with the modalities set out in Article 18 below, shall record in the aforementioned section of the Insider List the persons who have access to the Inside Information and who are not registered in the Permanent Access Section (as defined in Article 17.1 below).

In accordance with Article 9 below, the Chief Executive Officer ensures that the information is disclosed to the public, without prejudice to the possibility to delay the disclosure if the conditions and the procedure described in Article 13 below are met.

8.5 If an event qualified as Inside Information has generated during a Board of Directors meeting, in connection with a resolution adopted by the same, both the qualification of the said event as Inside Information and the decision to disclose it to the public as soon as possible the Inside Information, or to delay the disclosure when the conditions set forth in Article 13 occur, is taken by the same Board of Directors.

9. DISCLOSURE OF INSIDE INFORMATION TO THE PUBLIC

9.1 Without prejudice to the provisions of Article 9.8 below, in the cases provided for under Articles 8.4 and 8.5 below, the Chief Executive Officer shall promptly inform the Finance Department, the Investor Relator and the Legal Function so that to the extent of their competence, shall disclose to the public of the Inside Information concerning Ferretti and/or the Subsidiaries.

9.2 The Inside Information shall be disclosed to the public through a specific press release drawn up by the Finance Department and by the Investor Relator in accordance with Article 9.4 below, the contents of which shall be submitted to the Chief Executive Officer approval. The Company's communications of accounting information are accompanied by a written declaration by the Manager responsible for financial reports in accordance with Article 154-*bis* of the TUF.

9.3 The Finance Department and the Investor Relator shall disclose Inside Information to the public without delay in accordance with the modalities established by the legislation in force from time to time.

Only after the press release has been issued by the Finance Department and the Investor Relator the latter may make the public announcement.

As soon as the disclosure, described in the previous paragraph, has been made to the public and, in any event, within the opening of the market on the day following the said disclosure, the press release is published by the Finance Department and the Investor Relator on Ferretti's website, where it remains available for at least five years. The Inside Information referred to in the press releases shall be stored in a section of the website that is easily identifiable, presented in chronological order, with the date and time of the disclosure thereof, and be accessible free of charge and without discrimination.

9.4 Press releases shall:

a) be prepared in compliance with MAR Regulation and, in any case, with current legislation, taking into account both the recommendations and clarifications provided for by Consob, and the forms drawn up by Borsa Italiana set out in the Instructions to the Market Regulations; to this end, the General Counsel shall be consulted in advance;

b) contain elements suitable for allowing a complete and correct analysis of the events and

circumstances indicated above, as well as allowing connections and comparisons to be made with the contents of any previous press releases.

Inside Information shall be disclosed through press releases in a clear, complete, timely, adequate and non-selective manner.

9.5 Before the press release is issued, Recipients shall issue no statement regarding Inside Information, except in the event that such information is expressly requested by Consob or Borsa Italiana, in accordance with current legislation, in which case the provisions of this Procedure shall, in any event, be complied with.

9.6 Any significant change of the Inside Information already disclosed to the public shall be disclosed without delay in the manner described in this Procedure.

9.7 The Subsidiaries are required to provide Ferretti with all the necessary information for the timely and accurate fulfilment of the public disclosure obligations envisaged under current legislation.

9.8 In a Protracted Process, only the Final Event – where qualified as Inside Information pursuant to Article 5 above – shall be disclosed, as soon as possible after its occurrence, in accordance with the preceding paragraphs of this Article 9, unless the conditions for activating the delay procedure under Article 13 below are met.

The obligation to disclose to the public as soon as possible Inside Information that directly concerns the Company referred to in Article 9.1 above shall not apply to Inside Information relating to the intermediate steps of a Protracted Process, if such steps are connected with bringing about or resulting in particular circumstances or a particular event (*i.e.* the Final Event). In such case:

(i) the Company shall ensure the confidentiality of Inside Information relating to the intermediate steps during the course of the Protracted Process, until their disclosure in accordance with the preceding paragraphs of this Article 9;
(ii) the provisions of Articles 14, 17 and 18 below shall in any event apply and accordingly the Person in Charge shall be required to open the Insider List in accordance with the provisions thereof;
(iii) in the phase preceding the occurrence of the Final Event, it is not necessary to activate the delay as specified in Article 13.1 below;
(iv) where confidentiality can no longer be ensured or in the presence of sufficiently precise rumours indicating a leak of information (cf. Article 13.4 below), the Inside Information relating to the intermediate step shall be disclosed to the public as soon as possible in accordance with the preceding paragraphs of this Article 9;

the prohibitions against abuse of inside information and unlawful disclosure of inside information provided for under the applicable market abuse legislation shall in any event apply.

10. RELATIONS WITH THE FINANCIAL COMMUNITY, THE PRESS AND PARTICIPATION IN CONFERENCES AND SEMINARS

10.1 The Finance Department and the Investor Relator are responsible to arrange meetings with the financial community, as well as individual meetings with investors, analysts and rating companies. Details, comments and information that do not qualify as Inside Information are provided at these meetings.

The Finance Department and the Investor Relator shall identify the contents that will be discussed during the meetings referred to in the previous paragraph and submit them to the Chief Executive Officer for approval. If, during the aforementioned meetings, or during the interviews and statements made by corporate officers, including during participation in conferences and seminars, Inside Information arises, it shall be disclosed to the public in accordance with the provisions of this Procedure.

10.2 The Finance Department and the Investor Relator shall handle relations with the press. These Departments may avail itself of the support of an external consultant specialised in institutional and economic-financial press office activities. This consultant shall be bound by a confidentiality obligation.

All scheduled requests by the press for interviews or statements are subject to the Chief Executive Officer's assessment.

11. INFORMATION AT THE SHAREHOLDERS' MEETING

In the event that the Inside Information is disclosed at a Shareholders' Meeting, such information shall be disclosed to the public in accordance with the provisions of this Procedure.

12. SELECTIVE DISCLOSURE OF INSIDE INFORMATION TO THIRD PARTIES

12.1 Inside Information may be selectively disclosed to third parties provided that:

a) it is disclosed during the course of work or professional activities or functions or offices normally carried out; and

b) the persons to whom the information is disclosed are subject to confidentiality obligations imposed by laws, regulations or by-law. If this is not the case, the disclosure of Inside Information may occur only subject to entering into a confidentiality agreement with such third parties, in accordance with the company's standards that are applicable from time to time.

12.2 In the event that the aforementioned conditions are not satisfied, the Inside Information shall be promptly, disclosed to the public.

13. DELAY IN DISCLOSING INSIDE INFORMATION TO THE PUBLIC

13.1 As an exception to the provisions of Article 9 above, the Company may, under its own responsibility, delay the public disclosure of Inside Information, provided that all of the following conditions are met:

a) the immediate disclosure is likely to prejudice Ferretti's legitimate interests;

b) the Inside Information the disclosure of which is intended to be delayed is not in conflict with the latest information disclosed to the public or with any other type of communication by Ferretti in relation to the same matter to which the Inside Information refers. A non-exhaustive illustrative list of situations in which Inside Information is in conflict with the latest information disclosed to the public or with any other type of communication is set out in **Annex B**, which also contains a list of the "other types of communication" referred to above;

c) Ferretti is able to ensure the confidentiality of that Inside Information.

d) Ferretti does not resort to delay where the Inside Information relates to an intermediate step of a Protracted Process pursuant to Article 9.8 above.

13.2 The following shall be responsible for deciding to delay the disclosure of Inside Information to the public:

a) Ferretti's Chief Executive Officer, with the support of the Finance Department, the Sales Department and the Legal Function (together or alternatively between them); or

b) the Board of Directors in the case envisaged under Article 8.5 above or where deemed appropriate.

13.3 In the case referred to in letter (b) of Article 13.2 above, the Chief Executive Officer promptly informs the Legal Function of the decision to delay the public disclosure of Inside Information. In any event, the Legal Function records the delay in a document filed on the Company's records, indicating therein the information set out in **Annex C** to this Procedure (the "**Registration form of delay in disclosure of Inside Information**"). This information shall be accessible, legible and stored on a durable medium.

13.4 In the event of a delay of the public disclosure of Inside Information, Ferretti is nonetheless required to guarantee that the Inside Information is kept confidential and, where this confidentiality has ceased, restore information parity.

In order to ensure the confidentiality and secrecy of the Inside Information during the period of delay, the Chief Executive Officer shall take all necessary, or even just appropriate, measures to prevent the access to such inside information by persons other than those who need it for the purpose of performing their duties, by identifying in advance the latter and registering them in the Insider List, alerting these persons of the delayed disclosure procedure and the need to ensure the utmost confidentiality thereof. He shall continuously monitor whether the conditions that justify the delay continue to be met and, in particular, the confidentiality of the Inside Information whose disclosure has been delayed.

Confidentiality is considered to have ceased, with the ensuing obligation to disclose the Inside Information to the public as soon as possible, in the event that information in the public domain ("rumours") explicitly relates to the Inside Information the disclosure of which has been delayed or to Inside Information relating to the intermediate steps of a Protracted Process that has not been disclosed pursuant to Article 9.8 above, when such information is sufficiently accurate to confirm that the confidentiality of such information is no longer ensured.

13.5 Upon Consob request, according to current legislation, or should the Chief Executive Officer not be able to ensure confidentiality or ascertains that even one of the conditions referred to in Article 13.1 above is no longer satisfied, the Company shall disclose the Inside Information to the public without delay in accordance with the provisions of Article 9 above.

Furthermore, immediately after having disclosed the said Inside Information to the public and unless otherwise provided for under current legislation, the Company shall give to Consob notice in writing - through an email sent to the certified email address consob@pec.consob.it (specifying the "Market Division" as the recipient and "MAR disclosure delay" as the subject-matter) - of the information required by the MAR Regulation in the manner set out in **Annex D** to this Procedure ("**Draft notice of delay of disclosure of Inside Information**")[2]. The purpose of the notice is to provide the Authority with the information being delayed, the reasons for such delay, the date and time when the information became inside information, as well as an explanation of the manner in which the conditions previously indicated were satisfied and any other circumstance that the Company deems relevant, in order to allow Consob to make a complete assessment of the reported conduct, as well as promptly take appropriate supervisory measures with respect to the Financial Instruments.

To this end, the Chief Executive Officer, who is responsible for giving the aforementioned notice, avails himself of the support of the General Counsel.

13.6 In the event that a programme for purchasing treasury shares is ongoing, the Chief Executive Officer shall immediately report to the Chief Financial Officer Function, the Finance Department and the Legal Function the decision to delay the public disclosure of Inside Information, so that the latter suspends the execution of the purchase of the treasury shares, without prejudice to the provisions of Article 4.2 of the Implementing Regulation (EU) 2016/1052 and, in any case, the applicable legislation in force from time to time. The Chief Financial Officer Function the Finance Department and the Legal Function shall then be subsequently informed of the disclosure of the Inside Information which has led to treasury share purchase programme being suspended for the purpose of any continuation the programme.

14. LIST OF PERSONS HAVING ACCESS TO SPECIFIC RELEVANT INFORMATION AND INSIDE INFORMATION

14.1 The Company establishes and constantly updates a list of persons who have access to Specific Relevant Information (the **"Relevant Information List"** or the "**RIL**") and a list of persons having access to Inside Information (the "**Insider List**").

14.2 The Legal Function, in the person of the General Counsel, is responsible of maintaining and managing the RIL and the Insider List (the "**Person in Charge**"). In case of his absence or impediment, the role of the Person in Charge is temporarily assigned by the Person in Charge to a person appointed by him/her (the "**Person in Charge's Substitute**").

14.3 Those with whom there is a professional relationship shall be recorded in the RIL and Insider List, whether an employment contract or otherwise and, in in the performance of certain duties, have access to Specific Relevant Information and/or Inside Information within the existing relationship between the said person and Ferretti and/or the Subsidiaries.

14.4 The Insider List is established in accordance with the MAR Regulation.

14.5 The RIL is voluntarily established.

[2] Disclosure is made in the same manner to Consob upon the latter's request in accordance with the Italian provisions of law implementing the MAR Regulation.

15. RELEVANT INFORMATION LIST (RIL)

15.1 The RIL is divided into separate sections, one for each Specific Relevant Information, indicating the list of the persons who have access to each Specific Relevant Information relating to Ferretti and/or the Subsidiaries.

Each section of the RIL shall indicate at least:

(a) the Specific Relevant Information to which the section refers;

(b) the date of identification of the Specific Relevant Information;

(c) the identity of the persons having access to the Specific Relevant Information;

(d) the name of the company to which the said person belongs;

(e) the function and the reason for which the said person is registered;

(f) the date and the time on which the person had access to the Specific Relevant Information and the closing date.

15.2 The RIL is drafted and managed in an electronic format that ensures the confidentiality and accuracy of the information contained therein.

16. REGISTRATION AND CANCELLATION FROM THE RIL

16.1 Following the assessment of the relevant nature of the information referred to in Article 7 above, the Chief Executive Officer shall request the Person in Charge to register in the RIL all those who have access to the Specific Relevant Information identified. The registration request may also be made through the Chief Financial Officer Function, the Finance Department, the Legal Function, the Sales Department and the Investor Relations' (alternatively between them), as well as upon a direct request of the said parties who have access to the Specification Relevant Information

16.2 The Person in Charge shall promptly set up within the RIL a new section relating to the Specific Relevant Information identified by registering therein the parties who have access thereto, reporting the information referred to in Article 15.1 above. The Person in Charge notifies by email to the concerned parties the registration, making them aware of the confidentiality obligations arising from having access to the Specific Relevant Information. This disclosure is drafted in compliance with the format set out in **Annex E** to this Procedure.

16.3 If Specific Relevant Information is subsequently qualified as Inside Information according to Article 8.4 above, the Person in Charge shall close the RIL and open the Insider List, in accordance with Article 17 below. The RIL is also closed in the event that the said information loses its potentially privileged nature and, therefore, ceases to qualify as Specific Relevant Information. In the aforementioned cases, the Person in Charge informs the concerned parties of the cancellation by email (**Annex E-*bis***).

16.4 The Insider List also includes persons in possession of information that have assumed privileged nature without, due to the circumstances of the case, there having been the possibility of identifying the relevance thereof at an earlier time and, therefore, of not previously having been registered inside the RIL.

16.5 The data relating to the persons registered in the RIL shall be kept by the Legal Function for at least five years following the end of the circumstances that led to the registration thereof.

17. INSIDER LIST

17.1 The Insider List is divided into separate sections, one for each Inside Information identified, and contains the list of persons who have access to each Inside Information relating to Ferretti and/or the Subsidiaries. Within the Insider List there is also a permanent access section containing the list of persons who always have access to all the Inside Information (the "**Permanent Access Section**"). The data of the persons registered in the Permanent Access Section of the Insider List are not reported in any of the individual sections relating to each Inside Information.

17.2 The Insider List is drafted and managed in an electronic format in compliance with templates 1 and 2 of Annex I, Regulation 2026/1291, which ensures the confidentiality and accuracy of the information contained therein, as well as access and retrieval of the previous versions thereof.

18. REGISTRATIONS, UPDATES AND CANCELLATIONS IN THE INSIDER LIST

18.1 The Chief Executive Officer, following the assessment of the privileged nature of the information referred to in Article 8 above, shall request the Person in Charge to register in the Insider List all those who have access to the Inside Information by completing the Application Form set out in **Annex F** of this Procedure.

18.2 The Person in Charge proceeds without delay to establish within the Insider List a new section relating to the Inside Information identified and registers the persons who have access to the Information and who are not registered in the Permanent Access Section. Their registration is communicated to them by e-mail, specifying the prohibited conduct and the sanctions arising from the abuse and unlawful disclosure of Inside Information. This notice is drafted in compliance with the format set out in **Annex G** to this Procedure.

18.3 Upon the Chief Executive Officer's request and with the same modalities described in Articles 18.1 and 18.2 above, the Person in Charge shall make any updates to the registrations and the related disclosures to the concerned parties in accordance with the format set out in **Annex G-*bis*** to this Procedure. The Insider List must be updated promptly by the Person in Charge if:

(a) the reason for which the person is enrolled in the Insider List has changed, including the case when it is necessary to move the person's enrolment from one section of the Insider List to another one;

(b) a new person must be enrolled in the Insider List;

(c) it should be noted that a person on the Insider List no longer has access to Inside Information.

Each update indicates the date and time when the change occurred that made necessary the update.

18.4 Following the public disclosure of the Inside Information, the Person in Charge shall cancel without delay the parties registered in the single section of the Insider List relating thereto, communicating to them the cancellation according to the procedures referred to in Article 18.2 above.

In the event that the Inside Information ceases to exist for other reasons, the Person in Charge, upon the Chief Executive Officer's request and in accordance with the procedures referred to in Articles 18.1 and 18.2 above, shall cancel the persons registered in the individual section of the Insider List relating thereto, communicating to them the completed cancellation in accordance with the format set out in **Annex -G-*bis*** to this Procedure.

18.5 The Chief Executive Officer, with the support of the Finance Department and the Legal Function, identifies the persons to be included in or removed from the Permanent Access Section (the "**Persons with permanent Access**"). By way of example, in the Permanent Access Section may be enrolled if the conditions set forth in the relevant regulation are met:

(a) the Chief Executive Officer;

(b) executives and employees reporting directly to the Chief Executive Officer; and

(c) the chief financial officer.

Upon the Chief Executive Officer's request, the Person in Charge, in the same manner described in Articles 18.1, 18.2 and 18.4 above, shall promptly register or cancel the Persons with permanent access

and make the related disclosures to the concerned parties.

18.6 The persons registered in the Insider List acknowledge in writing of the notices of registration in the Register sent by the Person in Charge.

18.7 The data relating to the persons registered in the Insider List, as well as all the supporting documentation (such as, by way of example only, requests for registration and the communications to the registered persons) must be kept by the Legal Function for at least five years following the circumstances that led to the registration or updating thereof no longer being applicable.

19. NON-COMPLIANCE WITH THE PROCEDURE

19.1 This Procedure is binding. In any case, compliance with the rules provided for by the Procedure does not exempt Recipients to compliance with applicable legislation.

19.2 Failure to comply with the obligations and prohibitions referred to in the previous articles may also lead to employees being subject to disciplinary sanctions provided for by the current contractual provisions. For other persons, the Board of Directors reserves the right to resolve upon any measures deemed appropriate, taking into account the specific circumstances of the case.

19.3 Without prejudice to Article 19.2 above, failure to comply with the obligations envisaged under the applicable legislation as governed by the Procedure is subject to the sanction envisaged under the national and/or European Union legislation in force from time to time on market abuse.

19.4 The Recipient is responsible for any loss or sanction suffered by Ferretti as a result of the breach of the obligations or the infringement of the prohibitions to which it is bound under this Procedure and the applicable provisions of law and/or regulations and will hold Ferretti harmless and indemnified from any adverse effects suffered by the latter.

19.5 This Procedure refers to the Organisational Model adopted by Ferretti in accordance with Legislative Decree No. 231/01.

20. AMENDMENTS AND ADDITIONS

20.1 The Inside Information Procedure is amended by the Ferretti Board of Directors, with the support of the Audit Committee.

20.2 The Procedure may be amended by the Legal Function in order to adapt it to the regulatory changes and/or guidelines adopted by the competent Authorities. The Ferretti Audit Committee and the Board of Directors shall be informed of these changes at the first meeting of the Audit Committee or the Board following the amendments made by the Legal Function.

20.3 The Chief Executive Officer shall take all appropriate measures to identify the information referred to this Procedure, for the purpose of monitoring such information, executing confidentiality agreements and, more generally, implementing the Procedure.

Annex A – Non-exhaustive illustrative list of Final Events in Protracted Processes

Set out below is a non-exhaustive illustrative list of Final Events in Protracted Processes and, for each Final Event, of the time at which it is deemed to have occurred and at which it must be disclosed.

Given the non-exhaustive nature of the list of Final Events in Protracted Processes set out below, the identification of Final Events for Protracted Processes not included in such list remains subject to a case-by-case assessment by the Chief Executive Officer. To this end, the Chief Executive Officer may rely on the non-exhaustive list set out below, provided that there are analogies between the Final Events in Protracted Processes not included in the list and those included in the list.

It being understood that where the Final Event (referred to in Sections A to D of the list below) coincides with a decision of the «management body» of the Company, for the purposes of compliance with the time of disclosure set out in the list, the following scenarios shall be taken into account:

(i) where a committee or an executive director (e.g. the chief executive officer) has been delegated or authorised by the Board of Directors to act on behalf of the Company, such committee or executive director shall act as the management body;

(ii) where the company law requires that a decision of the management body be approved by the shareholders, the management body's decision to submit a proposal for approval by the shareholders shall constitute the relevant time for disclosure purposes.

N.	Protracted Process	Final Events or final circumstances	Time of disclosure
(a)	**CORPORATE STRATEGY**		
1.	Agreements (including acquisition or disposal of material assets or subsidiaries)	Signing of the agreement or another equivalent act having binding effect	As soon as possible after the signing of the agreement or of another equivalent act having binding effect
2.	Mergers	Approval of the merger plan	As soon as possible after the approval of the merger plan by the management body of the issuer
3.	Major corporate reorganisations	Decision on the corporate reorganisation	As soon as possible after the management body of the issuer has taken the final decision to proceed with a corporate reorganisation
4.	Withdrawal from a material agreement by the issuer	Decision to withdraw from a material agreement	As soon as possible after the management body of the issuer has taken the decision to withdraw from a material agreement
(b)	**CAPITAL STRUCTURE, DIVIDENDS AND INTEREST PAYMENTS**		
5.	Capital increase	Decision to increase capital	As soon as possible after the management body of the issuer has taken the final decision to increase capital
6.	Issuance of new instruments	Decision to issue new instruments	As soon as possible after the management body of the issuer has taken the final decision to issue new instruments
7.	Buy-back of own shares	Decision to proceed with the buy-back of own shares	As soon as possible after the management body of the issuer has taken the final decision to proceed with the buy-back of own shares
8.	Conversion of instruments	Decision to convert instruments	As soon as possible after the management body of the issuer has taken the final decision to convert instruments
9.	Dividends	Decision to propose to the shareholders a distribution of	As soon as possible after the management body of the issuer has taken the decision to submit for

N.	Protracted Process	Final Events or final circumstances	Time of disclosure
		dividends or a change in the dividend policy	shareholder approval a distribution of dividends or a change in the dividend policy
10.	Deferral or cancellation of interest payments or redemptions	Decision to defer or cancel interest payments or redemptions	As soon as possible after the management body of the issuer has taken the decision to defer or cancel the payment of interest or redemptions
(c) **FINANCIAL INFORMATION**			
11.	Financial reports or interim financial reports	Recognition or approval of financial results	As soon as possible after the management body of the issuer has recognised or approved the financial results
12.	Forecasts	Recognition or approval of forecasts	As soon as possible after the management body of the issuer has recognised or approved the forecasts
(d) **CORPORATE GOVERNANCE**			
13.	Appointment or removal of members of the management body of the issuer or of key senior managers	Decision to appoint or remove	As soon as possible after the management body of the issuer has taken the decision to appoint or remove a member of the management body of the issuer or a key senior manager
14.	Significant amendments to the articles of association or the internal regulations	Decision to propose to the shareholders significant amendments to the articles of association or the internal regulations	As soon as possible after the management body of the issuer has taken the decision to submit for shareholder approval significant amendments to the articles of association or the internal regulations
(e) **PUBLIC AUTHORITY INTERVENTIONS**			
15.	Application for a licence or authorisation	Application for a licence or authorisation	As soon as possible after the issuer has submitted the application for a licence or authorisation to the competent authority
16.	Grant or refusal of the licence or authorisation	Grant or refusal of the licence or authorisation	As soon as possible after the issuer has received the official notification by which the competent authority grants a licence or authorisation or refuses an application for a licence or authorisation, including where, following an application, the issuer and the competent authority have exchanged preliminary information or draft decisions that may themselves constitute inside information, or where the decision may be or is subject to appeal
17.	Revocation of the licence or authorisation	Revocation of the licence or authorisation	As soon as possible after the issuer has received the official notification by which the competent authority revokes the licence or authorisation, including where the issuer and the competent authority have previously exchanged preliminary information or draft decisions that may themselves constitute inside

N.	Protracted Process	Final Events or final circumstances	Time of disclosure
			information, or where the decision may be or is subject to appeal
(f)	**JUDICIAL PROCEEDINGS, SANCTIONS AND DELISTING**		
18.	Administrative proceedings	Decision of the competent authority	As soon as possible after the competent authority informs the issuer of its final decision following the relevant investigations, including where the issuer and the competent authority have previously exchanged preliminary information or draft decisions that may themselves constitute inside information, or where the decision may be or is subject to appeal
19.	Interim measures in judicial proceedings, whether as claimant or defendant	Decision of an authority or a court	As soon as possible after the issuer has received notification of the decision on interim measures, including where the decision may be or is subject to appeal
20.	Judicial proceedings	Decision of an authority or a court	As soon as possible after the issuer has received notification of the decision, including where the decision may be or is subject to appeal
21.	Proceedings for the quantification of sanctions	Decision on sanctions	As soon as possible after the issuer has been informed of the decision on sanctions, including where the decision may be or is subject to appeal
22.	Delisting	Decision of delisting	In case of voluntary delisting, as soon as possible after the management body of the issuer has taken the final decision of delisting. In case of a decision of delisting by the competent authority or the trading venue, as soon as possible after the issuer has received the official notification thereof, including where the issuer and the competent authority or the trading venue have previously exchanged preliminary information or draft decisions that may themselves constitute inside information

Annex B

A. NON-EXHAUSTIVE LIST OF SITUATIONS IN WHICH INSIDE INFORMATION IS IN CONFLICT WITH THE LATEST INFORMATION DISCLOSED TO THE PUBLIC OR WITH OTHER TYPES OF COMMUNICATION; OTHER TYPES OF COMMUNICATION

Set out below is a non-exhaustive illustrative list of situations in which Inside Information is in conflict with the latest information disclosed to the public or with any other type of communication by the Company in relation to the same matter to which the Inside Information refers.

In exceptional cases, where it is not possible to draw a clear conclusion as to the existence of a conflict based exclusively on the latest information disclosed to the public or on any other type of communication, the Company should also take into account previous information or communications.

N.	SITUATION
1.	Inside Information concerning a material change in forecasts, financial results or business objectives previously announced or publicly disclosed (e.g. profit warnings or earnings surprises)
2.	Inside Information concerning a material change in the environmental or social impact of a project or product previously announced or publicly disclosed (e.g. failure to meet environmental targets)
3.	Inside Information concerning the financial sustainability of an issuer/emission allowance market participant where substantially different information on its financial conditions has previously been announced or publicly disclosed (such as the need for a capital increase or an extraordinary bond issuance)
4.	Inside Information that the results or deadlines of a product or project under development will not be met, where such results or deadlines have previously been announced or publicly disclosed
5.	Inside Information concerning a material change in the capital structure previously announced or publicly disclosed (e.g. a significant change relating to the issuance of financial instruments)
6.	Inside Information concerning a material change in a corporate strategy previously announced or publicly disclosed (e.g. the decision to enter a new geographic market segment)
7.	Inside Information concerning a material change in the fundamental elements of a contract or transaction previously announced or publicly disclosed (e.g. the termination of a commercial partnership or, in case of an acquisition, the choice of a different target company)
8.	Inside Information concerning a material change in the corporate governance previously announced or publicly disclosed, including the management structure and codes of conduct (e.g. the decision to cancel a planned increase in the number of independent members of the board of directors).

o.

B. OTHER TYPES OF COMMUNICATION

(g) Any communication or press release published by the Company, including through social media or other media and on its own website;

(h) public interviews of any person officially representing the Company;

(i) publicly accessible pre-close calls, roadshows and other public events, including webinars and podcasts, organised or authorised by the Company and in which any person officially representing it participates;

(j) advertising and marketing campaigns made public by the Company;

(k) publicly accessible regulatory documents of the Company;

(l) publicly accessible communications made in the context of the Company's shareholders' meetings;

(m) any other public communication by any person officially representing the Company.

Annex C – Form registering a delayed disclosure of Inside Information

The following information are required under Article 17(4) of Regulation (EU) No. 596/2014 ("**MAR**") and Article 4(1) of Implementing Regulation (EU) 2016/1055 of the Commission of 29 June 2016 concerning the delay in public disclosure of inside information, as described below.

Identification of the publicly disclosed inside information that was subject to delayed disclosure:	
a) Date and time:	
i) when the inside information first existed within the issuer;	
ii) the decision to delay the disclosure of inside information was made;	
iii) the issuer is likely to disclose the inside information.	
***b) the identity of the persons within the issuer t responsible for*;**	
i)making the decision to delay disclosure and deciding on the start of the delay and its likely end;	
ii) ensuring the ongoing monitoring of the conditions for the delay;	
iii) making the decision to publicly disclose inside information;	
iv) providing the requested information about the delay and the written explanation to the competent authority.	
***c) evidence of the initial fulfilment of the conditions referred to in Article 17(4) of the MAR and of any change of this fulfilment during the delay period*:**	
i) the conditions provided for under Article 17(4)(a) and (b) of the MAR;	

ii) the conditions provided for under Article 17(4)(c) of the MAR and, specifically, the information barriers which have been put in place internally and with regard to third parties to prevent access to inside information by persons other than those who require it for the normal exercise of their employment, profession or duties within the issuer;	
iii) the arrangements put in place to disclose the relevant inside information as soon as possible where the confidentiality is no longer ensured.	

Annex D – Draft notice of delayed disclosure of Inside Information

To

Commissione Nazionale

per le Società e la Borsa – Consob

Divisione

Mercati, Via G.B

Martini, 3 00198

– Roma

By email to the certified e-mail address consob@pec.consob.it

Cattolica (RN),_____

Re: Delay in disclosing according to the MAR – Disclosure made under Article 17(4) of Regulation (EU) No. 596/2014 ("MAR").

Dear Sirs,

Pursuant to Article 17(4) of the MAR, Ferretti S.p.A. (the "**Company**") hereby notifies to this Authority of the delay in disclosing inside information to the public concerning _____, which was disclosed with a press release attached hereto.

***

Description of the modalities under which the conditions to delay the public disclosure were met.

_____

In accordance with Article 17(4) of the MAR, the information required by Article 4(3) of Implementing Regulation (EU) 2016/1055 are provided below.

Full company name	Ferretti S.p.A.
Identity of the person making the notification	_____, Chief Executive Officer Ferretti S.p.A.
Contact details of the person making the notification	Email: [•] phone number [•]
Identification of the publicly disclosed inside information that was subject to delayed disclosure	Disclosure titled "_____"; Regulated Information No. _____ Regulated Information Identifier ___- Type ___. Date and time of the public disclosure: ___ , hours_____

Date and time when the inside information first existed within the issuer and the decision to delay disclosure of the inside information	___, ___.
Identity of all persons responsible for the decision to delay the public disclosure of inside information and the relevant monitoring	_____
Identity of all persons responsible for the decision to publicly disclose the inside information	_____
The information barriers which have been put in place internally and with regard to third parties to prevent access to inside information by persons other than those who require it for the normal exercise of their employment, profession or duties within the issuer;	_____

We remain fully at your disposal for any clarification you might need.

Kind regards.

Ferretti S.p.A.

The Chief Executive Officer

_____

Annex

Ferretti S.p.A. press release of _____ .

Annex E - Format for giving notice of registration in the Relevant Information List

Sent by e-mail

Dear Sir_____ /Dear Madam,_____ ,

Re: Registration in the Ferretti S.p.A. Relevant Information List (the "RIL")

We hereby inform you that, in accordance with the "Procedure for the management and dissemination of inside information" (the "**Procedure**") of Ferretti S.p.A. ("**Ferretti**" or the "**Company**"), effective from ___, the Company has registered you in the Ferretti RIL section in connection with the following specific relevant information:____ [*specify the Specific Relevant Information in relation to which the registration is made*] (the "**Specific Relevant Information**").

[*Applicable in the case of persons operating in the name or on behalf of the Company*]

You have also been identified as the contact person of _____ [*name of the company/ company of reference*] in relation to _____ [*name of the company/ company of reference*] processing and managing the Specific Relevant Information. Therefore, it will be your responsibility to identify the persons who can have access to the Specific Relevant Information and inform them of the obligations and prohibitions specified in the rest of this notice.

For the purposes of the above, we hereby inform you that "Relevant Information" means any information or data not yet qualified as Inside Information that the Company deems relevant, insofar as it relates to data, events, projects or circumstances which, on an ongoing, repetitive, periodic or sporadic, occasionally, or unforeseen basis, directly or indirectly concern Ferretti and which may, at a later, event imminent, time, assume a privileged nature

We must also inform you that, insofar as you are a person having access to Specific Relevant Information, you are bound by the confidentiality obligations provided for under legislation in force from time to time and the Procedure.

The Specific Relevant Information shall be kept in a way that prevents unauthorised persons from becoming apprised thereof.

Furthermore [You are forbidden to] [*to be used in case of Recipients belonging to Ferretti*] [We invite you not to] [*to be used for persons that do not belong to Ferretti's organisation*]:

a) disclose to others with any means of communication whatsoever confidential information, including Specific Relevant Information and Inside Information, of which you have become aware, if it is not indispensable for the performance of their occupations, professions or duties;

b) carry out directly or indirectly, on their behalf or on behalf of third parties, purchase transactions, sale transactions or any other transaction on Ferretti's financial instruments to which the Specific Relevant Information and Inside Information relate;

c) carry out, in the name and/or on behalf of the Company, purchase transaction, sale transaction or any other transaction on Ferretti's financial instruments to which the Specific Relevant Information and Inside Information relate;

d) recommend or induce others, on the basis of Specific Relevant Information and Inside Information, to buy, sell or carrying out, on your behalf or on behalf of third parties, any other transaction on Ferretti's financial instruments, to which such Information relates.

Kind regards

(The Person in Charge)

Annex E-bis - Format for giving notice of cancellation from the Relevant Information List

Sent by email

Dear Sir/Dear Madam,

Re: Cancellation from the Ferretti S.p.A. Relevant Information List (the "RIL")

We hereby inform you that, in accordance with the "Procedure for the management and dissemination of inside information" of Ferretti S.p.A. (the "**Company**"), the Company, commencing from ____, has cancelled your name from the RIL in relation to the following Specific Relevant Information _____

Kind regards

[•]

(The Person in Charge)

Annex F – Form requesting registrations/updates/cancellations in the Insider List

Applicant **Name and Surname** _____

***

Details identifying the Person to be registered /to which the changes/request for cancellation relate
Name and Surname _____ Company of origin_____

***

[ ] **Registration in the Permanent Access Section of the Insider List**

[ ] **Registration in the section of the Insider List relating to**:

***

[ ] **Request for Registration**

Description of the Reason: _____

Date and time when the applicant became aware of the Information that required to be registered: __, __

***

[ ] **Update of the Registration**

Description of the Reason: _____

Date and time when the applicant became aware of the Information that required to be updated: ___, ___

***

[ ] **Cancellation of the Registration**

Description of the Reason: _____

Date and time when the Information could no longer be accessed: _____, _____

***

Cattolica, ____ Applicant's signature_____

Annex G - Format for giving notice of registration in the Insider List

Sent by email

Dear Sir/Madam,

Re: Registration in the Register of persons having access to Ferretti S.p.A. Inside Information (the "Insider List")

In accordance with the provisions of Article 18 of the "**Procedure for the management and dissemination of inside information**" (the "**Procedure**") adopted by Ferretti S.p.A. ("**Ferretti**" or the "**Company**"), which is attached hereto, we hereby give you notice that, effective from ___ hours of _____, Ferretti proceeded to a register you in the Permanent Access Section of the Insider List, in consideration of your capacity as _____ [*specify the office/role held/ by the person registered justifying the registration, as well as the company/ the company of reference*].

[*or alternatively*]

register you, as ___ [*specify the office/role held/ by the registered person justifying the registration, as well as the company/ the company of reference*] in the section of the Ferretti Insider List relating to the following Inside Information: _____ [*specify the Inside Information in relation to which the registration is made*].

[*Applicable in the case of persons acting in the name or on behalf of the Company*]

You have also been identified as the contact person of _____ [*name of the company/ the company of reference*] in relation to processing and handling the Inside Information on behalf of _____ [*name of the company/ the company of reference*]. Therefore, it will be your responsibility to identify the persons who can have access to Inside Information for the purpose of performing such task and register those persons in the insider list of _____ [*name of the company/ the company of reference*]. The responsibility for this register rests solely with ____ [*name of the company/ the company of reference*] that has an independent duty to set it up and update it in accordance with the law.

In relation to the above, we invite you to provide us with/confirm [*if already available to Ferretti*] the following data, concerning you, to be indicated in the Insider List.

Name _____	Surname _____
Surname at birth (if different) _____	Date of birth _____
Tax Code _____	Private telephone number (land line and mobile phone) _____
Professional telephone number (land line and mobile phone) _____	Email address _____

Full private address *(street, house number, location, post code, State)*

_____

Name and address of the company of origin

_____

In relation to the above, we hereby invite you to:

- examine this notice, the Procedure and the related attachments, and keep a copy hereof;
- promptly confirm in writing to Ferretti, at the following email address, the receipt of this notice:

  - officeofthegeneralcounsel@ferretti.com.

or through any other means that ensures the receipt hereof by the Company, having taken note of the legal and regulatory obligations, as well as of the sanctions imposed in case of infringement that are connected with the registration in the Ferretti S.p.A. Insider List and that are envisaged under the relevant legislation.

* * *

Finally, we shall inform you that the personal data needed for registering you in the Insider List and proceeding with the related updates, in compliance with the provisions set out in Regulation (EU) 2016/679 (GDPR), will be processed and stored, with the help of IT media, by Ferretti, as Data Controller for the period required by the aforementioned legislation, so as to fulfil the obligations arising from the current legislation on market abuse and the processing of Inside Information. 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. Such information can also be disclosed to third parties, who have been appointed as Data Processors or independent Data Controllers (such as, for example, Public Institutions and Regulatory Authorities). Therefore, the disclosure of the requested personal data is mandatory. The failure to do so could lead to any of the sanctions provided for under current legislation and/or the Procedure being imposed on you [*the Company* _____] and/or Ferretti. You can exercise your rights in accordance with Article 13 of the GDPR (including, for example, the right to gain access your personal data, request rectification and update, if incomplete or inaccurate) by making a request to this effect to the Legal Function of Ferretti S.p.A., Via Irma Bandiera No. 62, Cattolica (Rimini).

The data controller of personal data is Ferretti S.p.A., with registered office at Via Irma Bandiera No. 62, Cattolica (RN).

The Data Protection Officer is Ms Alessandra Nisticò, who can be contacted at dpo@ferrettigroup.com.

***

For any further information and/or clarifications concerning this notice and its application, please contact Ferretti S.p.A., the Legal Function by e-mail at officeofthegeneralcounsel@ferretti.com.

Kind regards

[•]

(The Person in Charge)

Annex

- Copy of the “Procedure for the management and dissemination of inside information” of the Ferretti S.p.A.

Annex G-bis - Format for giving notice of updates in/cancellations from the Insider List

Sent by email

Dear Sir/Dear Madam,

Re: Update/cancellation of registration recorded in the Ferretti S.p.A. Register of persons having access to Inside Information ("Insider List")

in accordance with the provisions of Article 18 of the "**Procedure for the management and dissemination of inside information**" (the "**Procedure**") adopted by Ferretti S.p.A. ("**Ferretti**" or the "**Company**"), which is already in your possession, we hereby inform you that, effective from today, Ferretti proceeded to cancel your name from the Permanent Access Section of the Insider List [or alternatively] from the Insider List in relation to the following Inside Information_____.

[*or in the alternative*]

update your registration in the Insider List for the following reason:

_____

***

For any further information and/or clarifications concerning this notice and its application, please contact Ferretti S.p.A., the Legal Function by e-mail, at officeofthegeneralcounsel@ferretti.com.

Kind regards

[•]

(The Person in Charge)