**Ferretti S.p.A.**

***INTERNAL DEALING*** **PROCEDURE**

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## 1. PURPOSE

Pursuant to Article 19 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014, as subsequently amended and supplemented (the "**MAR**"), Articles 7 et seq. of Delegated Regulation (EU) No. 2016/522 of the Commission of 17 December 2015, as subsequently amended and supplemented, and of the Implementing Regulation (EU) 2016/523 of the Commission of 10 March 2016 launched by the European Union (hereinafter jointly referred to as the "**MAR Regulation**"), as well as, of Article *152-quinquies*.1 of the Regulation adopted by Consob with Resolution No. 11971 of 14 May 1999, as subsequently amended and supplemented (the "**Issuers' Regulation**"), the Board of Directors of Ferretti S.p.A. ("**Ferretti**" or the "**Company**") has adopted this procedure (the "***Internal Dealing* Procedure**" or the "**Procedure**"), with the aim of regulating, with binding effect, the carrying out of transactions carried out, including through third parties, by Relevant Parties and Persons Closely Associated (as defined below) and the related disclosure.

For all matters not covered in this Procedure, any other reference is expressly made to the relevant provisions of the applicable laws and regulations.

*The Internal Dealing* Procedure was approved by the Board of Directors of the Company on March, 20, 2023 and last amended on October, 27, 2026.

This Procedure shall become effective 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 S.p.A..

Any subsequent amendments and/or additions shall enter 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 case of urgency, by the Chairman of the Board of Directors or a by an executive director.

## 2. SCOPE OF APPLICATION

The *Internal Dealing* Procedure applies to transactions carried out on their own account by Relevant Persons and Persons Closely Associated to them, identified pursuant to Article 4 below, as well as to the corporate functions responsible for managing the Procedure

## 3. REFERENCES

The provisions contained in the *Internal Dealing* Procedure refer to the following legal and regulatory sources and principles:

- MAR Regulation;
- Issuers' Regulation;
- Consob Communication No. 0061330 of 1 July 2016;
- Code of Ethics of Ferretti and its subsidiaries.

## 4. RELEVANT PARTIES AND PERSONS CLOSELY ASSOCIATED

4.1 Pursuant to and for the purposes of the *Internal Dealing* Procedure, "**Relevant Parties**" means the following persons:

(i) the members of the Board of Directors and the effective members of the Board of Statutory Auditors of Ferretti,

(ii) managers who, although not members of the Board of Directors or the Board of Statutory Auditors of the Company, have regular access to inside information of Ferretti and/or its subsidiaries directly or indirectly concerning Ferretti and have the power to adopt managerial decisions that could impact the Ferretti's future development and prospects (the "**Managers with strategic responsibilities**").

4.2 Pursuant to and for the purposes of the *Internal Dealing* Procedure, the following persons are persons closely associated to the Relevant Parties (the "**Persons Closely Associated to the Relevant Parties**"):

i) a spouse or a *partner* considered to be equivalent to a spouse in accordance with the Italian law;

ii) a dependent child under Italian law;

iii) a relative who has shared the same household for at least one year on the date of the transaction concerned (identified pursuant to Article 5 below);

iv) a legal person, trust or partnership, (a) the managerial responsibilities of which are discharged by a Manager or by a person referred to in point (i), (ii) or (iii), or (b) which is directly or indirectly controlled by such a person, or (c) which is set up for the benefit of such a person, or (d) the economic interests of which are substantially equivalent to those of such a person.

## 5. TRANSACTIONS

5.1 Transactions concerning shares and bonds issued by the Company or derivatives or other related financial instruments, as identified by Article 19 MAR and Article 10 of Delegated Regulation (EU) 522/2016 (the " **MAR Relevant Transactions**") are subject to the *Internal Dealing* Procedure. The list of financial instruments covered by this Procedure is contained in **Annex A**. A non-exhaustive list of such MAR Relevant Transactions is contained in **Annex B.**

5.2 Pursuant to Articles 19 of the MAR and 152-quinquies.1 of the Issuers' Regulation, no disclosure shall be made in respect of MAR Relevant Transactions whose total amount, by the end of each calendar year, has not exceeded Euro 50,000 calculated by adding without adjustments all the MAR Relevant Transactions carried out in such period. Furthermore, MAR Relevant Transactions for which the applicable regulations do not require notification are not disclosed.

## 6. NOTIFICATION OBBLIGATIONS, TERMS AND CONDITIONS AND METHODS

6.1 Relevant Parties and Persons Closely Associated to the Relevant Parties must notify to the Company of MAR Relevant Transactions carried out directly by them or on their behalf promptly and in any case **no later than the first business day** (meaning by business day, for the purposes of this Procedure, all days other than Saturday, Sunday and other public holidays according to the national calendar) following the date of the MAR Relevant Transaction by transmitting the form provided for by Regulation (EU) 523/22016 (**Annex C** to the Procedure), duly completed and signed, to the Person in Charge (as defined below) by e-mail

to the following address officeofthegeneralcounsel@ferrettigroup.com. The execution of the transaction must also be communicated in advance by telephone to the Person in Charge or the person appointed by him/her on the following numbers:

- Person in Charge (General Counsel) +39 0283994000.
- Person in Charge's Substitute (Compliance Manager) +39 0283994000.

6.2 In addition to the above, the Relevant Parties and the Persons Closely Associated to the Relevant Parties shall notify Consob of the same MAR Relevant Transactions **within three business days** following the date of the MAR Relevant Transaction, by transmitting to Consob the form provided for by Regulation (EU) 523/22016 (**Annex C** to the Procedure), duly completed and signed, by means of:

- certified electronic mail, at consob@pec.consob.it (if the person making the notification is subject to the obligation to have a CEM); or
- e-mail, at protocollo@consob.it.

6.3 As an alternative to the provisions of Article 6.2 above, the notification to Consob of MAR Relevant Transactions may be made, on behalf of the Relevant Parties and/or Persons Closely Associated to the Relevant Parties, directly by Ferretti, in accordance with the procedures envisaged by the regulations in force and/or established by Consob, provided that

(i) the Relevant Party and/or the Person Closely Associated to the Relevant Party have granted Ferretti a specific power of attorney to that effect by signing and sending to Ferretti the form in **Annex D** to the Procedure (the "**Mandate**"), subject to acceptance of the Procedure itself;

(ii) the Mandate referred to in point (i) above has not subsequently been revoked;

(iii) the Relevant Party and/or the Person Closely Associated to the Relevant Party have notified the transactions carried out within the terms and in the manner set out in Article 6.1 above.

6.4 In the event one or more of the conditions under Article 6.3 above is not met, the obligation to notify to Consob under Article 6.2 above shall be borne solely by the Relevant Party and/or the Person Closely Associated to the Relevant Party, and Ferretti shall not be held liable in any way for any failure to notify Consob or delay in doing so. In particular, in the event of a delay in notification to Ferretti by the Relevant Party and/or the Person Closely Associated to the Relevant Party in breach of the provisions of Article 6.1 above, Ferretti shall notify the MAR Relevant Transaction to Consob, on the basis of the information received, as soon as possible, but shall in any way be held liable for any failure to comply with the deadline for notification to Consob referred to in Article 6.2 above.

6.5 Once Ferretti has received from the Relevant Parties and the Persons Closely Associated to the Relevant Parties the notifications referred to Article 6.1 above, Ferretti shall promptly, and in any case no later than two business days after the date of the MAR Relevant Transaction, disclose the relevant information to the public.

## 7. FUNCTIONS RESPONSIBLE FOR THE INTERNAL DEALING PROCEDURE

7.1 The Chief Executive Officer of Ferretti (the "**Chief Executive Officer**") shall identify the Relevant Parties under the terms set forth in Article 9 below.

7.2 The person in charge of Ferretti carries out the activities set out in Article 8 below (the '**Person in Charge**').

7.3 In the event of his absence or impediment, the role of the Person in Charge is temporarily assigned to a person appointed by the Person in Charge (the "**Person in Charge's Substitute**").

## 8. OBLIGATIONS OF THE PERSON IN CHARGE

8.1 The Person in Charge is responsible for ensuring compliance with the Procedure. In particular, the Person in Charge shall:

(i) prepare, update and keep the list of names of the Relevant Parties and Persons Closely Associated to the Relevant Parties;

(ii) inform each Relevant Party in writing of the obligations arising from the Procedure to which they are subject by sending **Annex D**;

(iii) deliver a copy of the Procedure to each Relevant Party so that they may: (i) sign the declaration referred to in **Annex E** to the Procedure, certifying acknowledgement and full acceptance of the Procedure; (ii) formalise any granting of the Mandate by signing the form referred to in **Annex E** to the Procedure (iii) promptly notify the Person in Charge, in writing, of the list of the Persons Closely Associated to the Relevant Parties and their identification data, as well as any subsequent update of the names and data previously communicated and any new name to be included in the list; (iv) notifying the Persons Closely Associated to the Relevant Parties of the existence of the conditions under which such persons are bound by the obligations arising from the Procedure, by using the form under **Annex F** and keep a copy of such notification;

(iv) drawn up and update the list of Relevant Parties and Persons Closely Associated to the Relevant Parties as well as any other persons to whom the Procedure applies pursuant to the laws time to time in force, and notify such persons of their inclusion in the list;

(v) keep all communications received and made to Consob and the market.

## 9. IDENTIFICATION OF THE RELEVANT PARTIES

9.1 The Chief Executive Officer, having consulted the Legal Function, on the basis of the corporate organisational structure and the system of powers and proxies from time to time adopted by the Company and its subsidiaries, identifies the Relevant Parties referred to in Article 4.1 above.

9.2 Once a Relevant Party has been identified, the Person in Charge updates the list of Relevant Parties and promptly informs the person concerned pursuant to Article 10 below.

## 10. DISCLOSURE TO RELEVANT PARTIES

10.1 The Person in charge shall inform each Relevant Party in writing of the identification and the resulting *internal dealing* obligations in accordance with the notification form set out in **Annex D** to this Procedure.

10.2 The Relevant Party must promptly return to the Person in Charge the declaration of acceptance as set out in **Annex E** of this Procedure (the "**Acceptance**"), together with the list of the Persons Closely Associated to the Relevant Parties, duly completed. With the Acceptance the Relevant Party also instructs the Company to carry out the notifications of the Transactions to the public and to Consob, unless the Relevant Party intends to personally carry out the notification to Consob in accordance with Article 6 above. In this case he/she shall notify the Person in Charge in writing of this choice. All documents must be dated and signed by the Relevant Party.

## 11. DISCLOSURE TO PERSONS CLOSELY ASSOCIATED TO THE RELEVANT PARTIES

11.1 It is the responsibility of each Relevant Party: i) to inform in writing, (using the disclosure form set out in **Annex F** of this Procedure) the Persons Closely Associated to the Relevant Parties of their status and the resulting *internal dealing* obligations; ii) to transmit to such persons a copy of the *Internal Dealing* Procedure; and iii) to ensure that - also pursuant to Article 1381 of the Civil Code - they comply with such obligations..

11.2 It is also the responsibility of each Relevant Party to notify the Person in Charge the list of the Persons Closely Associated to the Relevant Parties in accordance with Article 11.1 above. The Relevant Party shall promptly notify Ferretti in writing of any change in the list of Persons Closely Associated to the Relevant Parties.

11.3 The Relevant Party shall keep a copy of the communication made to the Persons Closely Associated to the Relevant Parties, signed for acknowledgement of receipt by the addressees.

## 12. TRADING DURING BLACKOUT PERIODS

12.1 Relevant Parties and Persons Closely Associated to the Relevant Parties are prohibited from carrying out MAR Relevant Transactions on their own behalf or on behalf of third parties, directly or indirectly, during the 30 calendar days preceding the announcement of the draft financial statements, the half-yearly financial report and, if applicable, the quarterly financial information published by Ferretti ("***Black-Out Periods***"). The *Black-Out Periods* shall end following the public dissemination of the press release on the approval of the accounting data.

## 13. EXEMPTIONS

13.1 Ferretti may, from time to time, allow exceptions to the prohibition set forth in Article 12 above and authorise a Relevant Party and/or a Person Closely Associated to the Relevant Party to carry out MAR Relevant Transactions during a *Black-Out Period* (the "**Exceptions**"). The Exemptions may be granted by the Chief Executive Officer with the support of the Legal Function, pursuant to the MAR Regulation, provided that the Relevant Party and/or the Person Closely Associated to the Relevant Party send to the Company a written and motivated request at least 5 calendar days before the date envisaged for the execution of the MAR Relevant Transaction and that the following conditions are met:

a) one of the following circumstances applies:

(i) on the basis of a case-by-case assessment, in exceptional conditions, such as serious financial difficulties forcing the execution of the MAR Relevant Transactions; or

(ii) due to the characteristics of the trading, in the case of MAR Relevant Transactions carried out at the same time as, or related to, an employee share participation or saving scheme, and plans for employees relating to financial instruments other than shares, a guarantee or rights to shares and guarantees or rights to financial instruments other than shares, or transactions in which the interest of the beneficiary in the relevant security is not subject to change;

b) the Relevant Party and/or the Person Closely Associated to the Relevant Party is able to demonstrate that the MAR Relevant Transaction cannot be carried out at any time other than but during the *Black-Out Period*.

The Company also allows Relevant Parties to trade or carry out transactions on their own behalf or on behalf of third parties during a Black-Out Period in the case of transactions or trading activities that do not involve active investment decisions taken by the Relevant Party, or that derive exclusively from external factors or actions of third parties, or that are transactions or trading activities, including the exercise of rights conferred by derivative instruments, based on pre-established conditions.

13.2 This shall be without prejudice to the right of the Chief Executive Officer, if deemed necessary or appropriate, to refer the decision to the Board of Directors of the Company.

13.3 Requests for trading authorisation during a *Black-Out Period* must be sent by e-mail to presidenza@ferrettigroup.com and contain:

a) a description of the MAR Relevant Transaction with, in the hypothesis sub (a)(i) above, an explanation, in reasonable detail, of the exceptional circumstances that make the immediate sale of the Company's shares necessary and the reasons why the sale of the Company's shares is the only reasonable way to obtain the necessary funds and objective evidence (including documentary evidence) relating to the above; and, in the hypothesis sub (a)(ii) above, an indication of the number and type of Financial Instruments concerned, as well as

b) the reasons why it is necessary or appropriate to carry out the MAR Relevant Transaction in a *Black-Out Period*.

13.4 The authorisation is notified in writing to the Relevant Party and/or to the Person Closely Associated to the Relevant Party, within five working days of receipt thereof, if the authorisation is complete and adequately supported by documentary evidence.

## 14. SANCTIONS

14.1 This Procedure is binding. Compliance with the rules laid down in the Procedure does not, however, exempt Relevant Parties and Persons Closely Associated to the Relevant Parties from the obligation to comply with the applicable regulations.

14.2 Failure to comply with the obligations and prohibitions set out in the previous articles may entail, for employees, the application of disciplinary sanctions provided for by the contractual regulations in force. For other persons, the Board of Directors reserves the right to decide on any measures, taking into account the specific circumstances.

14.3 Without prejudice to the provisions of paragraph 14.2 above, failure to comply with the disclosure obligations provided for by the applicable regulations as governed by the *Internal Dealing* Procedure is subject to sanctions pursuant to the national and/or EU regulations in force from time to time on market abuse.

14.4 The Relevant Party, also on behalf of the Persons Closely Associated to the Relevant Party, shall be liable for any damage or penalty suffered by Ferretti as a result of a delay and, more generally, as a result of failure to comply with the obligations or infringement of the prohibitions imposed on it pursuant to this Procedure and the applicable provisions of law and/or regulations, and shall hold Ferretti harmless and indemnified against any detrimental consequences suffered by it.

## 15. AMENDMENTS AND ADDITIONS

15.1 The *Internal Dealing* Procedure can be amended by Ferretti's Board of Directors, with the support of the Audit Committee.

15.2 The Procedure may be amended by the Legal Function to comply with regulatory changes and/or guidelines issued by the competent authorities. The Audit Committee and Ferretti's Board of Directors must be informed of any such changes at the first meeting of the Audit Committee or Board of Directors following the amendments made by the Legal Function.

**Annex A - List of Financial Instruments Subject to the *Internal Dealing* Procedure**

The Financial Instruments subject to the *Internal Dealing* Procedure and subject to disclosure by Relevant Parties and Persons Closely Associated to the Relevant Parties are those defined in Article 4(1)(15) of Directive 2014/65/EU, as referred to in Article 3(1)(1) of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 ("**MAR**") as subsequently amended and supplemented, and listed here:

1) Transferable securities.

2) Money market instruments.

3) Units in collective investment undertaking.

4) Option futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, emission allowances or other derivatives instruments, financial indices or financial measures which may be settled physically or in cash.

5) Options, futures, swaps, forwards and any other derivative contracts relating to commodities that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event).

6) Options, futures, swaps, and any other derivative contract relating to commodities that can be physically settled provided that they are traded on a regulated market, a MTF, or an OTF, except for wholesale energy products traded on an OTF that must be physically settled.

7) Options futures, swaps, forwards and any other derivative contracts relating to commodities, that can be physically settled not otherwise mentioned in point 6 of this Section and not being for commercial purposes, which have the characteristics of other derivative financial instruments.

8) Derivative instruments for the transfer of credit risk.

9) Financial contracts for differences.

10) Options, futures, swaps, forward rate agreements and any other derivative contracts relating to climatic variables, freight rates or inflation rates or other official economic statistics that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event, as well as any other derivative contracts relating to assets, rights, obligations, indices and measures not otherwise mentioned in this Section, which have the characteristics of other derivative financial instruments, having regard to whether, inter alia, they are traded on a regulated market, OTF, or an MTF ;

11) Emission allowances consisting of any units recognised for compliance with the requirements of Directive 2003/87/EC (Emissions Trading Scheme).

**Annex B - MAR Relevant Transactions**

Transactions that are subject to notification include all transactions carried out by Ferretti's Relevant Parties and Persons Closely Associated to the Relevant Parties involving Ferretti's shares, debt instruments, other Ferretti instruments, derivative instruments or other financial instruments related to all of the above[1] .

1. Transactions that are subject to notification shall include:

a) the pledging or lending of financial instruments by or on behalf of Relevant Parties or Persons Closely Associated to Relevant Parties;

b) transactions carried out by persons professionally arranging or executing transactions or by another person on behalf of Relevant Parties or Persons Closely Associated to Relevant Parties, including where discretion is exercised;

c) transactions carried out in the context of life insurance policy as defined in Directive 2009/138/EC of the European Parliament and of the Council, where:

- the policyholder is a Relevant Party or a Person Closely Associated to a Relevant Party;
- the investment risk is borne by the policyholder; and
- the policyholder has the power or discretion to make investment decisions with respect to specific instruments in the life insurance policy or to execute transactions involving specific instruments of that life insurance policy.

2. Transactions that are subject to notification also include[2] :

a) acquisition, disposal, short sale, subscription or exchange;

b) the acceptance or exercise of a stock option, including of a stock option granted to Relevant Parties or employees as part of their remuneration package, and the disposal of shares stemming from the exercise of a stock option ;

c) entering into or exercise of equity swaps;

d) transactions in or related to derivatives, including cash-settled transactions;

e) entering into a contract for difference on a financial instrument of the concerned issuer or on emission allowances or auction products based thereon;

f) acquisition, disposal or exercise of rights, including put and call options, and warrants;

g) subscription of a capital increase or debt instrument issuance;

h) transactions in derivatives and financial instruments linked to a debt instrument of the concerned issuer, including credit default swaps;

i) conditional transactions upon the occurrence of the conditions and actual execution of the transactions;

j) automatic or non-automatic conversion of a financial instrument into another financial instrument, including the exchange of convertible bonds to shares;

k) gifts and donations made or received and inheritances received;

l) transactions executed in index-related products, baskets and derivatives, insofar as required by Article 19 of Regulation (EU) No 596/2014;

[1] See Article 19(7) of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 as subsequently amended and supplemented.

2 See Article 10 of Commission Delegated Regulation (EU) No 2016/522 of 17 December 2015, as subsequently amended and supplemented.

m) transactions executed in shares or units of investment funds, including alternative investment funds (AIFs) referred to in Article 1 of Directive 2011/61/EU of the European Parliament and of the Council[3] , insofar as required by Article 19 of Regulation (EU) No 596/2014;

n) transactions executed by the manager of an AIF in which a Relevant Party or a Person Closely Associated to the Relevant Party has invested, insofar as required by Article 19 of Regulation (EU) No 596/2014;

o) transactions carried out by a third party under an individual portfolio or asset management mandate on behalf of or for the benefit of Relevant Parties or Persons Closely Associated to the Relevant Parties;

p) borrowing or lending of shares or debt securities of the issuer or derivatives or other financial instruments linked thereto.

[3] Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 (OJ L 174, 1.7.2011, p. 1).

**Annex C**

**Format for Notification and Public Disclosure of MAR Relevant Transactions**

| | | |
|---|---|---|
| **1** | **Details of the person discharging managerial responsibilities/person closely associated** | |
| a) | Name | *[For natural persons: the first name and the last name(s).]].*<br>*[For legal persons: full name, including legal form as provided for in the register where it is incorporated, if applicable].* |
| **2** | **Reason for notification** | |
| a) | Position/status | *[For or persons discharging managerial responsibilities: the position occupied within the issuer, emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.]*<br>*[For persons closely associated,*<br>*— An indication that the notification concerns a person closely associated with a person*<br>*discharging managerial responsibilities;*<br>*— Name and position of the relevant person discharging managerial responsibilities.].* |
| b) | Initial notification/ Amendment | *[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]* |
| **3** | **Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor** | |
| a) | Name | *[Full name of the entity].* |
| b) | LEI | *[Legal entity identification code, in accordance with the LEI code of ISO 17442].* |
| **4** | **Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted** | |
| a) | Description of the financial instrument, type of instrument<br>Identification code | *[- Indicate as to the nature of the instrument: — a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument; — an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance. — Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.* |

<table>
<tr><td>b)</td><td>Nature of the transaction</td><td>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 ( 1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.<br><br>Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linked to the exercise of a share option programme.]</td></tr>
<tr><td>c)</td><td>Price(s) and volume(s)</td><td><table><tr><td>Price(s)</td><td>Volume(s)</td></tr><tr><td></td><td></td></tr></table><br>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows, ...) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed. Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</td></tr>
<tr><td>d)</td><td>Aggregated information<br>- Aggregate volume<br>- Price</td><td>– [The volumes of multiple transactions are aggregated when these transactions: — relate to the same financial instrument or emission allowance; — are of the same nature; — are executed on the same day; and — are executed on the same place of transaction. Using the data standard for quantity, including where applicable the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.] [Price information: — In case of a single transaction, the price of the single transaction; — In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions. Using the data standard for price, including where applicable the price currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</td></tr>
<tr><td>e)</td><td>Date of transaction</td><td>[Date of the particular day of execution of the notified transaction. Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]</td></tr>
<tr><td>f)</td><td>Place of the transaction</td><td>[Name and code to identify the MiFID trading venue, the systematic internaliser or the organised trading platform outside of the Union where the transaction was executed as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014, or if the transaction was not executed on any of the above</td></tr>
</table>

| | | |
|---|---|---|
| | | *mentioned venues, please mention 'outside a trading venue'.]* |

([1]) *Commission Delegated Regulation (EU) 2016/522 of 17 December 2015, as subsequently amended and supplemented, supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions (see page 1 of this Official Journal)*

**Annex D - Disclosure to Relevant Parties by the Company**

**Subject:** Notification of the Relevant *Party's* status on *internal dealing* pursuant *to* Article 19 of Regulation (EU) No 596/2014.

Dear Mr _____/ Dear Madam _____,

in compliance with the obligation set forth in Article 19 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014 as subsequently amended and supplemented (the "**MAR Regulation"**) and of Ferretti S.p.A.'s *internal dealing* procedure (the "***Internal Dealing* Procedure**" or the "**Procedure**"), we hereby inform you that, in your capacity as _____, you have been identified as a Relevant Party of Ferretti S.p.A..

Therefore, we invite you to read the contents of the Procedure, attached hereto, and be aware of the legal obligations on *internal dealing* set forth in Article 19 of the MAR Regulation and in the Procedure itself and to promptly return to the undersigned, in his capacity as Person in Charge, the declaration of Acceptance set forth in Annex E of the *Internal Dealing* Procedure, also attached hereto.

We also remind you that you are obliged to inform the Persons Closely Associated to the Relevant Parties (as defined in the Procedure) in writing of your legal obligations concerning *internal dealing*, using the form in Annex F of the Procedure for this purpose.

While remaining at your disposal for any clarification, we cordially greet you.

Place_____, Date _____

Ferretti S.p.A.

(The Person in Charge of *Internal Dealing* Procedure)

_____

**Annex E - Acceptance**

Dear Ferretti S.p.A.

Via Irma Bandiera, no. 62,

Cattolica

Place and Date_____, _____

**To the kind attention of the Person in Charge of *Internal Dealing* Procedure**

Dear Sirs,

Subject: **Ferretti S.p.A. - *Internal Dealing***

Having acknowledged that I have been identified as a Relevant Party pursuant to the Internal Dealing Procedure adopted by Ferretti S.p.A. and aware of the related obligations, pursuant to Article 19 of Regulation (EU) no. 596/2014 on market abuse, as supplemented by Delegated Regulation (EU) 2016/522, as subsequently amended and supplemented, and by the Regulation (EU) 2016/523 (the "***Internal Dealing* Procedure**"), the undersigned

[*Name, surname, personal data and position/role of the Relevant Party*].

- declares that it has received a copy of the *Internal Dealing* Procedure and accepts its provisions;
- encloses, with this communication, the list of the Persons Closely Associated to the Relevant Parties (as identified in the *Internal Dealing* Procedure) duly signed, undertaking to promptly notify Ferretti S.p.A. in writing of any changes to the aforesaid list;
- [instructs Ferretti S.p.A. to carry out, on its behalf, the notification to Consob and to the public in the manner and within the terms established by the *Internal Dealing Procedure* and, to this end, undertakes to notify Ferretti within the terms established in Article 6 of the *Internal Dealing* Procedure;]
- is aware that the violation of the disclosure requirements set out in the *Internal Dealing Procedure* and the applicable law, including EU law, is liable to sanctions.

Signature

_____

Name and Surname

_____

Information pursuant to Articles 13 and 14 of the General Data Protection Regulation no. 2016/679/UE ("**GDPR**")

Pursuant to Articles 13 and 14 of the GDPR, which provides for the protection of persons and other subjects with regard to the processing of personal data, the following information is provided.

The personal data provided by "Relevant Parties", also in respect of "Persons Closely Associated to Relevant Parties" pursuant to the *Internal Dealing* Procedure, shall be used, with or without the aid of electronic instruments and any possible software, for the sole purpose of complying with the provisions of the law or regulations, including those of European rank, as well as the provisions of the *Internal Dealing* Procedure. The same data may be included, also for summary purposes, in the financial statements and corporate governance documents of Ferretti S.p.A..

Interested parties may exercise the rights recognised by Articles 15 to 22 of the GDPR and, in particular, by way of example, the right to access their personal data, to ask for them to be corrected, updated or deleted, if incomplete or erroneous, as well as to oppose their processing for legitimate reasons, by addressing their requests to the Corporate Affairs Department of Ferretti S.p.A., Via Irma Bandiera no. 62, Cattolica (RN).

The data controller is Ferretti S.p.A., with registered office in Via Irma Bandiera no. 62, Cattolica (RN).

Having read the above information, I give my consent to the processing of my personal data for the purposes indicated therein.

Date .....  Signature…….

**Annex F - Disclosure of Relevant Parties to Persons Closely Associated to the Relevant Parties**

Example of notification by Relevant Parties to Persons Closely Associated to the Relevant Parties of their obligations under the legislation in force from time to time.

_____

_____

**Subject:** Notification of the status of Person Closely Associated to Relevant Parties *with* on *internal dealing* pursuant *to* Article 19 of Regulation (EU) No. 596/2014.

Dear _____,

in compliance with the obligation set out in Article 19 of Regulation (EU) No. 596/2014 and the Ferretti S.p.A. *internal dealing* procedure (the "**Procedure**"), of which I am a Relevant Party as I am _____ of the Company, I hereby inform you that I have identified you as a Person Closely Associated to me and therefore you will be included in the list of Relevant Parties and Persons Closely Associated to the Relevant Parties kept by Ferretti S.p.A.. As such, you must comply with the legal requirements on *internal dealing* and, in particular, the disclosure obligations established by Article 19 of Regulation (EU) No 596/2014 and the Procedure.

Also with reference to the sanctions that may be imposed in the event of a breach of the aforementioned disclosure obligations, I invite you to read the relevant regulations, as well as the Procedure (attached hereto).

In particular, I inform you that you shall notify me, without delay, by means of the Notification Form attached as **Annex C** of the Procedure, completed, initialed, dated and signed by you, of each Transaction you have carried out on Ferretti's Financial Instruments.

In order to comply with the regulations, please return a copy of this letter duly signed for acknowledgement and acceptance.

Place _____, Date _____

Signature

_____

BY RECEIPT:

Place _____ Date_____, and Signature _____