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Philogen
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*Procedure for the maintenance, management and updating of the
Registers of Persons who have access to
Material Information and Inside Information*

December 16, 2020

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Procedure for the maintenance, management and updating of the Registers of Persons who have access to Material Information and Inside Information

Background

In compliance with the provisions contained in the MAR and the related EU Implementing Regulation No. 2016/347, Philogen S.p.A. (hereinafter "**Philogen**" or the "**Company**") hereby establishes:

- (i) the "**Insider Register**", i.e. the register of persons who, by reason of their work or professional activity or by reason of the functions they perform, have access to Inside Information of the Company and/or its subsidiaries; and
- (ii) the so-called "**RIL**" and, together with the Insider Register, the "**Registers**", i.e. the register of persons who, by reason of their working or professional activity or by reason of the functions they perform, have access to Material Information concerning the Company and/or its subsidiaries.

With this procedure, the Company also regulates the procedures for keeping, managing and updating the Registers.

The purpose of setting up the Registers is to focus greater attention on the importance of Material Information (as defined below) and Inside Information (as defined below), with the aim of making the recipients of Material Information and Inside Information more responsible and to protect the integrity of the markets, while at the same time facilitating the supervisory activities of the competent Authority.

Definitions

In addition to the terms defined in the text of this Procedure, the following terms have the following meanings:

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

"**Issuers' Regulations**" means: the Regulations adopted by Consob Resolution no. 11971 of 14 May 1999, concerning the rules for issuers, as subsequently supplemented and amended;

"**Implementing Regulation (EU) 2016/347**" means: the Regulation of the European Commission of March 10, 2016 which establish the implementation of technical standards with respect to the precise format of the registers of persons with access to inside information and the updating thereof pursuant to MAR, as subsequently supplemented and amended;

"**TUF**" means: the Legislative Decree no. 58/1998, as subsequently integrated and amended.

Article 1

Structure of the Registers

1.1The Company shall establish and maintain, or entrust the care of, a person acting in its name or on its behalf,

- (i) RIL, the purpose of which is to monitor the circulation of Material Information within the Company as well as the persons who have access to it from time to time; and
- (ii) the Insider Register, i.e. the register of persons who have access to Inside Information.

If the Company decides to entrust the care of the Registers to a person acting in its name or on its behalf, the Company shall always retain the right of access thereto.

The RIL shall remain completed and updated with the required information until the Material Information entered therein:

- (i) ceases to be such, in which case the Responsible Person shall close the Main Section of the RIL dedicated to such information; or
- (ii) does not qualify as Inside Information, in which case the Responsible Person shall close the Main Section of the RIL dedicated to such

information and shall open the corresponding Main Section of the Insider Register.

1.2 The Registers are kept in electronic format and consist of a computer database, which ensures:

- the accuracy of the information contained therein;
- the certainty of the date of registration, the inalterability of its content and the confidentiality of the data entered;
- access to and retrieval of information limited to only those clearly identified individuals who need access by the nature of their respective function or position;
- access to and retrieval of previous versions of the Registers.

1.3 Entries in the RIL are made time by time by the Responsible Person for access to each item of Material Information (the "**Main Section**").

Each Main Section of the RIL is divided into subsections, one for each item of Material Information. Each time new Material Information is identified, a new and appropriate section is added to the RIL.

1.4 Entries in the **Insider Register** are made by the Responsible Person:

- for access on a permanent basis to all Inside Information (the "**Supplementary Section**"); and
- for access on an occasional basis to each item of Inside Information (Main Section).

Individuals who always have access to all Inside Information are registered in the Supplementary Section. Insofar as the Company avails itself of the option to create the Supplementary Section, it is not necessary to also report the data of the persons registered in the Supplementary Section in the Main Sections.

Each Individual Section of the Insider Register is subdivided into subsections, one for each item of Inside Information. Each time a new item of Inside Information is identified, a new and appropriate section is added to the Insider Register.

1.5 The Registers are set up on a subjective basis.

All members of the administrative, management and control bodies, employees, consultants, and collaborators of the Company and of the Group (the "**Obligated Persons**"), and in general all those who have access to Material and Inside

Information and with whom a relationship of professional collaboration exists, be it an employment contract or otherwise, and who, in the performance of certain tasks, have access to Material and Inside Information, such as consultants, accountants or credit rating agencies (the "**Recipients**"), are registered.

To this end, the person in charge of Human Resources shall inform the Company's legal department of any changes in the company's workforce in order to ensure that the Registers are constantly updated.

The following outline identifies the subjects who are required to communicate in writing, as soon as possible, to the Responsible Person, the data concerning the Recipients.

Main Section	Subjects required to communicate
Recipients due to specific activities or offices held (including Standing Auditors, Non-executive Directors, Independent Directors, Strategic Managers, as well as the Boards of Directors and Statutory Auditors of subsidiaries and the Independent Auditors)	Individuals registered in the Supplemental Section identify Recipients and communicate their identity to the Responsible Person for enrollment/amendment/deletion. Without prejudice to the above, the Function Managers identify the collaborators and consultants of the Company/Group to whom Inside Information is transmitted and communicate their identity to the Responsible Person for recording/modifying/deleting them. These information obligations are fulfilled by means of the completion of Model 1, Annex 1 to this Procedure , which the same Functional Managers or Persons registered in the Supplementary Section must request to be completed by the collaborators and consultants of the Company/Group.
Supplementary Section	Subjects required to communicate
a) The Chairman of the Board of Directors,	The Human Resources function identifies Recipients and communicates their identity to the Responsible Person for enrollment/ modification/deletion.

b) Executive Directors Dario Neri and Giovanni Neri;	These disclosure requirements are fulfilled by completing Model 2, Annex 1 to this Procedure.
c) the <i>Chief Financial Officer</i>	

Art. 2

Classification of Material Information and Inside Information

2.1 "Material" is any non-public information concerning, directly or indirectly, Philogen (and therefore also concerning subsidiaries of Philogen provided that such information is material to Philogen) or the common stock of Philogen that is likely to become Inside Information (as defined below) (the "**Material Information**"). Material Information includes all types of Material Information identified by the Company. Inside Information means information of a precise nature, which has not been made public, relating, directly or indirectly, to Philogen or one or more Financial Instruments, which, if made public, could have a significant influence on the prices of such Financial Instruments or related derivative financial instruments (the "**Inside Information**"):

- **precise character:** information is precise if it refers to a set of circumstances which exists or may reasonably be expected to come into existence or to an event which has occurred or may reasonably be expected to occur and if this information is sufficiently specific to allow conclusions to be drawn on the possible effect of this set of circumstances or this event on the prices of the financial instruments or the related derivative financial instrument. In this respect, in the case of a prolonged process which is intended to bring about, or which determines, a particular circumstance or event, that future circumstance or event, as well as the intermediate steps in that process which are linked to the bringing about or determination of the future circumstance or event, may be considered as information of a precise nature.

- **Financial Instruments:** the shares and financial instruments issued by Philogen, which are: (a) admitted to trading or for which a request for admission to trading on a regulated market has been submitted; (b) traded on a multilateral trading facility, admitted to trading on a multilateral trading facility or for which a request for

admission to trading on a multilateral trading facility has been submitted; (c) traded on an organized trading facility.

- **significant influence on prices**: by information which, if made public, could have a significant influence on the prices of Financial Instruments or related derivative financial instruments, must be understood that information which a reasonable investor would probably use as one of the elements on which to base his or her investment decisions.

2.2 Without prejudice to the above principle, information may be considered Inside Information:

- connected with and contained in the accounts relating to the financial statements (annual or consolidated), the half-yearly reports or the income statement and balance sheet figures referring to intermediate periods of the Company and/or other companies in the group controlled by it (the "**Group**"), where relevant for the Company;
- coinciding with or derived from forecast data (budgets, forecasts, plans, including those relating to individual divisions);
- relating to matters concerning the administrative, management and control bodies;
- relating to the activities of Group companies or extraordinary corporate transactions, where these are significant for the Company;
- related to significant litigation.

2.3 The regulatory provision provides the definition of Inside Information, however, the identification of the information that can concretely be qualified as such is instead left to a case-by-case evaluation. By way of a non-exhaustive list, other circumstances that could be qualified as Inside Information are:

- change in control or significant changes in the Company's internal organizational structure;
- participation in the formation of companies and joint venture agreements in general;
- purchase, sale, and disposal of equity investments, companies and business units;

- initiation and stipulation of collaboration or participation agreements with third parties of strategic importance;
- loan agreements and the issue of bonds;
- specific investment projects;
- corporate reorganization and restructuring, including mergers, demergers and capital transactions.
- Any intermediate step in the processes described above.

The assessment as to whether the additional circumstances indicated above qualify as Inside Information must in any case be carried out on a case-by-case basis, also taking into account their relevance to the Group's economic, equity and financial indicators.

Art. 3

Contents and Updating of the Register

3.1 Without prejudice to the contents required by Implementing Regulation (EU) 2016/347, the Registers shall contain the following information for each Recipient:

- (i) number and date of registration;
- (ii) personal details (surname, first name, full residential address and tax code or company name, registered office, date of incorporation, number of registration with the Register of Companies and tax code). In the case of legal persons, bodies or professional associations, the personal details of the person who can identify the persons who specifically have access to Material or Inside Information are also indicated;
- (iii) business and personal phone number;
- (iv) company/entity to which they belong, if they are individuals;
- (v) description of the reason for inclusion in the RIL or Insider Register (as applicable);
- (vi) date and time at which the person obtained access to Material Information (RIL) or Inside Information (Insider Register); if the

person is registered in the Supplementary Section, date and time of registration in the Supplementary Section;

- (vii) the date on which the registration notice is sent;
- (viii) Date of updating of the information already entered in the RIL or Insider Register (as applicable);
- (ix) the date on which the notice is sent that the information contained in the RIL or Insider Register has been updated (as the case may be);
- (x) date and time at which the person ceased to have access to Material Information (RIL) or Inside Information (Insider Register);
- (xi) Date of removal from the RIL or the Insider Register (as applicable);
- (xii) reason for removal from the RIL or the Insider Register (as applicable);
- (xiii) the date on which the notice of removal from the RIL or the Insider Register (as applicable) is sent.

3.3 The Company shall update the Registers as soon as possible indicating the date and time, in the event of:

- establishment of a new Main Section following the creation of new Material or Inside Information;
- change of the reasons for the registration of a Recipient already present in the Registers, including the case in which it is necessary to move the registration from one Section to another within one of the Registers or from the RIL to the Insider Register;
- registration of a new Recipient;
- removal of Recipients who no longer have access to Material or Inside Information.

3.4 Each update shall indicate the date and time when the event occurred that made the update necessary.

3.5 Data relating to persons entered in the Insider Register shall be retained for at least five years after the circumstances that led to the entry or update of the Register cease to exist.

Article 4

Person in charge of keeping and maintaining the Registers

4.1 The person responsible for keeping and maintaining the Registers is the Company's legal department, in the person of the relative manager (the "Responsible Person"). This person keeps evidence of the criteria adopted in the keeping of the Registers and the methods of management and research of the data contained therein.

4.2 The Responsible Person:

- Continuously monitors the proper management of the contents of the Registers;
- Updates the Registers;
- sends the communications referred to in Art. 6 below;
- collaborates with the Supervisory Authorities in the event of requests for data and inspections and transmits, as soon as possible, the Registers to Consob in the event it requests the same, in accordance with the procedures laid down by the legislation in force at the time ¹

4.3 In carrying out his duties, the Responsible Person may avail himself of collaborators, including external collaborators, who operate under his responsibility.

Art. 5

Criteria for keeping the Insider Register

5.1 The Registers are kept on computer by the Responsible Person, using criteria and methods that ensure easy access, management, consultation, extraction and printing of the information and data contained therein. These criteria are inspired by the principles of traceability of information and confidentiality of data and comply with the legislation, including regulations, applicable and in force from time to time.

5.2 The Chairman of the Board of Directors, the Executive Directors and, depending on the operation in question, the Heads of Departments involved from time

¹ Consob, with Communication no. 0061330 of July 1, 2016, has announced that the transmission to Consob of the Insider Register, or of the specific Sections indicated in the request, must be made in writing, via PEC, at consob@PEC.consob.it, following any further indications in the request.

to time, shall communicate in writing to the Responsible Person, as soon as possible, any entries and/or updates to be entered in the Registers with complete data, taking into account the organizational structure of Philogen and the relative changes, including subjective changes, as well as the operational requirements determined by the effect of a particular operation or event.

5.2 The Responsible Person shall therefore see to the keeping and updating of the Insider Register as soon as possible after the communication of the change in its content, in compliance with the regulations concerning the protection of the personal data processed.

5.3 The Insider Register may be accessed by those who are employed by the Company's legal department or by other employees or consultants of the Company who need to view it in order to perform their duties or assignments.

Art. 6

Information on Entry in the Register

6.1 The Company shall inform the Recipients in writing by means that guarantee verification of receipt and an effective understanding of the obligations:

- (a) of the fact that they have been entered in the Registers and, at the same time, of the legal obligations and the sanctions applicable in the event of violations;
- (b) updating or modifying of the data entered into the Registers;
- (c) the deletion from the Register or closure of a Main Section.

6.2 Information on enrolment in and termination of the Registers is provided by means of communications conforming to the models in Attachment A and Attachment B, sent by email or other method deemed most appropriate from time to time. The Responsible Person also informs those entered in the Registers of any updates that concern them.

6.3 In the event of non-communication of the acknowledgement by the subjects entered in the Registers, they shall in any event be deemed to be aware of the contents of this procedure.

6.4 In the event that an Obligated Person (i) comes into possession in any way of Material or Inside Information or (ii) ceases to possess Material or Inside Information and has not received notification of its registration in the Registers or its cancellation

- as the case may be -, said Obligated Person must inform the Responsible Person as soon as possible, who will immediately update the same.

Art. 7

Obligations of Persons entered in the Register

The Persons entered in the Register shall adopt suitable measures to prevent access to the Inside Information in their possession by persons other than the persons entered in the Register.

Persons acting in the name of or on behalf of Philogen shall sign appropriate confidentiality agreements concerning the handling of Inside Information as well as comply with the obligations set forth in Article 18 of the MAR.

Article 8

Effective Date

These regulations come into force from the date of filing with Borsa Italiana S.p.A. of the application for admission to trading of Philogen's shares on the Mercato Telematico Azionario organized and managed by Borsa Italiana S.p.A..

ANNEX I

MODEL 1

List of persons with access to Material / Inside Information - Section on [indicate the relevant Material / Inside information specific to a contract or related to an event].

Date and time (of creation of this section of the list or when the inside information was identified): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)].

Date and time (last updated): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)].

Date of transmission to appropriate authority: [yyyy-mm-dd]

Name of the access holder	Surname of the access holder	Surname at birth of the access holder (if different)	Professional phone numbers (professional landline and mobile direct dial)	Name and address of the company	Function and reason for access to Material/Inside information	Obtained (date and time the holder obtained access to Material/Inside information)	Ceased (date and time the holder ceased to have access to Material/Inside information)	Date of Birth	National identification number (if applicable)	Private phone numbers (home and personal mobile)	Full private address (street, number, location, zip code, state)
[text]	[text]	[text]	[numbers (no spaces)]	[address of the issuer/ emission allowance market participant/auction platform/auction monitor/auction supervisor or third party of the access holder]	[description of role, function, and reason for listing].	[yyyy-mm-dd, hh:mm UTC].	[yyyy-mm-dd, hh:mm UTC].	[yyyy-mm-dd]	[number and/or text].	[numbers (no spaces)]	[full private address of access holder - street and house number - site - ZIP CODE - Country]

MODEL 2

Permanent access section of the list of persons with access to Inside Information

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

Date and time (last updated): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)].

Date of transmission to appropriate authority: [yyyy-mm-dd]

Name of the access holder	Surname of the access holder	Surname at birth of the access holder (if different)	Professional phone numbers (fixed and mobile professional hotline)	Name and address of the company	Function and reason for access to Inside Information	Entered (date and time the holder was entered in the permanent access section)	Date of Birth	National identification number (if applicable)	Private phone numbers (home and personal mobile)	Full private address (street, number, location, zip code, state)
[text]	[text]	[text]	[numbers (no spaces)]	[address of the issuer/ emission allowance market participant/auction platform/auction monitor/auction supervisor or third party of the access holder]	[description of role, function, and reason for listing].	[yyyy-mm-dd, hh:mm UTC].	[yyyy-mm-dd]	[number and/or text].	[numbers (no spaces)]	[full private address of access holder - street and house number - site - ZIP CODE - country]

Attachment A

Subject: [Entry in / Deletion from] Register of Material Information of Philogen S.p.A.

Dear [●],

having regard to the provisions of the "*Procedure for the Management and Disclosure of Material and Inside Information*" (the "**Procedure**") adopted by Philogen S.p.A. (the "**Company**"), the text of which can be found on the website www.philogen.com, we inform you that the offices of the Company, by reason of the work or functions performed by you with regard to the business process referred to in this communication, have taken steps [to register/delete] your person [in/from] the so-called "*RIL*" (the "**RIL**"), that is, the register of persons who, by reason of their work or professional activity or by reason of the functions performed, have access to Material Information and potentially Inside Information concerning the Company and/or its subsidiaries, in compliance with the following provisions:

MATERIAL INFORMATION: [●]

REASON: [●]

REGISTRATION OR DELETION: [●]

DATE AND TIME [REGISTRATION/DELETION]: [●] [●]

[to be deleted in the notice of deletion]: In view of the above, it is requested that you, by means of an email to be sent to the address [●], confirm that you have taken note of the legal and regulatory obligations arising from such registration and of the penalties applicable in the event of misuse of inside information and unlawful communication of such information, governed by the following provisions to which reference should be made for completeness

- Regulation (EU) No. 596/2014, for legal and regulatory obligations;
- Legislative Decree no. 58/1998, for the applicable sanctions;

as well as any integrations or variations, where appropriate, to the personal information at the end of this document.

The personal data required for registration in the RIL and for related updates will be processed in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

As a reminder, under the Procedure, the subjects registered in the RIL are required to:

- (i) keep confidential the information and documents that can be considered as potentially Material Information or Inside Information which is acquired in the performance of their tasks and/or functions;
- (ii) use the information and documents that can be considered as potentially Material Information or Inside Information exclusively in the performance of their duties and in compliance with current company procedures;
- (iii) not disclose to third parties (except as provided for in the Procedure): a) Potentially Material Information or Inside Information; b) information and data relating to accounting that are intended to be included in the annual or consolidated financial statements, in the half-yearly report, or in any case in reports relating to interim periods of Philogen, before the approval of such documents by the Board of Directors of the Company and the completion of the related public disclosure procedure; c) preliminary or forecast data, and information relating to circumstances, events, or transactions potentially capable of being potentially Material Information or Inside Information, before the completion of the public disclosure procedure;
- (iv) manage information and documents that can be considered as potentially Material Information or Inside Information in compliance with confidentiality obligations, with particular attention to the management of the media on which such information can be traced, such as electronic devices, USB devices, electronic or paper communications;
- (v) make sure that any paper support containing potentially Material Information or Inside Information is not left unattended or otherwise available to persons not authorized to receive such potentially Material Information or Inside Information;
- (vi) refrain from and ensure that employees and collaborators of the Company and of the companies of the Group refrain from intruding into the *privacy of* colleagues (so-called *shoulder surfing*);
- (vii) refrain from consulting documents containing potentially Material Information or Inside Information in public places.

If the obligations of confidentiality described above are not complied with, the persons entered in the RIL must immediately inform the Company's legal department, at the same time providing all the elements necessary to allow an adequate assessment of the situation.

We draw your attention to the fact that the restrictions and limitations imposed as a result of your registration in the RIL do not exclude the further application of duties of confidentiality and prevention of market abuse as governed by the following provisions, to which we refer for completeness:

- Regulation (EU) No. 596/2014;
- Legislative Decree no. 58/1998].

With best regards.

Philogen S.p.A.

Personal information

date of birth	
tax code	
work phone numbers (direct and mobile)	
private phone numbers (home and mobile)	
private address (street, house number, zip code, city, country)	
email address	

For acknowledgement and acceptance:

NAME SURNAME

Place, date

Attachment B

Subject: [Listing/Delisting] from the Philogen S.p.A. Insider Register

Dear [●],

Recalling, on the one hand, the provisions of Article 18 of Regulation (EU) No. 596/2014 ("**MAR**"), and on the other hand, what is prescribed by the "*Procedure for the Management and Disclosure of Material and Inside Information*" (the "**Procedure**") adopted by Philogen S.p.A. (the "**Company**"), the text of which can be found on the website www.philogen.com, we inform you that the offices of the Company, by reason of the work or functions performed by you in relation to the business process referred to in this communication, have taken steps [to register/delete] your person [in/from] the so-called "*Insider Register*" (the "**Register**"), that is, the register of persons who, by reason of their work or professional activity or by reason of the functions performed, have access to Inside Information of the Company and/or its subsidiaries in accordance with the following provisions:

INSIDE INFORMATION: [●]

REASON: [●]

REGISTRATION OR DELETION: [●]

DATE AND TIME [REGISTRATION/DELETION]: [●] [●]

[to be deleted in the notice of deletion]: In view of the above, you are requested to confirm by email to be sent to the address [●] that you have taken note of the legal and regulatory obligations arising from such registration and of the sanctions applicable in the event of misuse of inside information and unlawful disclosure of such information, governed by the following provisions to which reference should be made for completeness:

- Regulation (EU) No. 596/2014, for legal and regulatory obligations;
- Legislative Decree no. 58/1998, for the applicable sanctions;

as well as any integrations or variations, where appropriate, to the personal information at the end of this document.

The personal data required for registration in the Register and for related updates will be processed in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

As a reminder, under the Procedure, the subjects entered in the Register are required to:

- (i) Keep confidential the information and documents that can be considered as Inside Information

and that have been acquired in the performance of their tasks and/or functions;

- (ii) use the information and documents that can be considered as Inside Information exclusively in the performance of their duties and in compliance with the corporate procedures in force;
- (iii) not disclose to third parties (except as provided for in the Procedure): a) Inside Information; b) information and data relating to accounting that are intended for use in the financial statements or consolidated financial statements, in the half-yearly report, or in any case in reports relating to interim periods of Philogen, before the approval of such documents by the Board of Directors of the Company and the completion of the relevant public disclosure procedure; c) preliminary or forecast data, and information relating to circumstances, events or operations potentially capable of being considered as Inside Information, before the completion of the public disclosure procedure;
- (iv) manage information and documents that can be considered as Inside Information in compliance with confidentiality obligations, with particular attention to the management of the media on which such information can be traced, such as electronic devices, USB devices, electronic or paper communications;
- (v) ensure that any paper media containing Inside Information is not left unattended or otherwise available to persons not authorized to receive such Material Information or Inside Information;
- (vi) refrain from and ensure that employees and collaborators of the Company and of the companies of the Group refrain from intruding into the *privacy of* colleagues (so-called *shoulder surfing*);
- (vii) refrain from consulting documents containing Inside Information in public places

If the obligations of confidentiality described above are not complied with, the persons entered in the Register are required to inform the Company's legal office immediately, at the same time providing all the elements necessary to permit an adequate evaluation of the situation.

We draw your attention to the fact that the restrictions and limitations provided for as a consequence of your registration in the Register do not exclude the further application of duties of confidentiality and prevention of market abuse as governed by the following provisions, to which we refer for completeness:

- Regulation (EU) No. 596/2014;
- Legislative Decree no. 58/1998].

With best regards,

Philogen S.p.A.

Personal information

date of birth	
tax code	
work phone numbers (direct and mobile)	
private phone numbers (home and mobile)	
private address (street, house number, zip code, city, country)	
email address	

For acknowledgement and acceptance:

NAME SURNAME

Place, date
