CODE OF CONDUCT FOR

INTERNAL DEALING

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1. DEFINITIONS

In addition to the definitions contained in other articles, the terms and expressions starting with a capital letter used in this Code of Conduct have the following definitions, which are valid whether the term or expression is used in the singular or plural:

Blackout period: a period of time prior to the end of each reporting period during which Relevant Persons are prohibited from carrying out Transactions, as referred to in art. 7 of the Code and unless covered by the exemptions provided for.

Board of Directors: the Company's Board of Directors.

CFA: Legislative Decree 58 of 24 February 1998, as amended – the Consolidated Finance Act.

Chairman: the Chairman of the Board of Directors.

Chief Executive Officer: the Company's Chief Executive Officer (CEO).

Code: this Code of Conduct.

Company: Azzurra Aeroporti SpA.

Debt financial instruments: the bonds issued by the Company on the Global Exchange Market, a multilateral trading system managed by the Euronext Dublin Stock Exchange, and any other debt financial instruments that may be issued by the Company and traded - or for which the Company has applied for or authorised admission to trading – on a regulated market, an MTF or an OTF.

Delegated Regulation: European Commission Delegated Regulation 2016/522 of 17 December 2015, as amended and updated from time to time.

List of Relevant Persons: a list of Relevant Persons and of Persons Closely Associated with such persons in accordance with art. 19, para. 5 of the MAR

Market Abuse Regulation (MAR): Regulation 596/2014 of 16 April 2014 issued by the European Parliament and Council of the European Union.

Office of the General Counsel: the Office of Mundys' General Counsel.

Regulations for Issuers: the Regulations adopted by CONSOB Resolution 11971 of 14 May 1999, as amended.

Relevant Persons: the persons defined in art. 3.1 of the Code and pursuant to art. 19, paragraph 1 of the MAR.

Transactions by Relevant Persons: the transactions defined in art. 5.1 of the Code and pursuant to art. 19 of the MAR.

Working Days: working days according to the Italian calendar (excluding, therefore, Saturdays, Sundays and national holidays).

2. INTRODUCTION

The Board of Directors has approved this Code in order to ensure compliance with the obligations regarding the reporting, to the Company and the market, of information pertaining to Transactions by Relevant Persons, as defined below.

The Code must be applied and interpreted in compliance with the guidance from time to time issued by the ESMA (including the "Questions and Answers on the Market Abuse Regulation") and the CONSOB, as applicable.

The rules contained in the Code are legally binding for the persons to which such rules are addressed, as specified hereinafter.

Compliance with the Code does not, in any event, exempt Relevant Persons and Persons Closely Associated with them from the obligation to comply with other related laws and regulations in force such as, by way of example but not limited to, those regarding the obligation to notify major equity interests, those relating to market abuse and the abuse of inside information and any other applicable legislation.

3. DEFINITION OF RELEVANT PERSONS

For the purposes of the Code, **Relevant Persons** are:

1) the Chairman, the Chief Executive Officer, members of the Board of Directors and standing members of the Board of Statutory Auditors at **Azzurra Aeroporti SpA;**

2) the Chief Executive Officer and the Chief Financial Officer of **Aeroport de la Cote d'Azur SA;**

3) other persons – whether natural or legal persons – from time to time identified in accordance with the applicable legislation by the Chief Executive Officer.

The following are "**Persons Closely Associated with Relevant Persons**":

a) a spouse (or a partner considered to be equivalent to a spouse), as defined by national law;
b) a dependent child, as defined by national law;
c) a relative who has shared the same household for at least one year on the date of the related Transaction by the Relevant Person;
d) a legal person, trust or partnership:
   - the managerial responsibilities of which are discharged by a Relevant Person or by one of the persons indicated in points a), b) or c);
   - directly or indirectly controlled by a Relevant Person or by one of the persons indicated in points a), b) or c);
   - set up for the benefit of a Relevant Person or one of the persons indicated in points a), b) or c);
   - whose economic interests substantially coincide with those of a Relevant Person or one of the persons indicated in points a), b) or c)[1]; and
e) other persons – whether natural or legal persons – as identified from time to time in accordance with the applicable legislation.

4. RESPONSIBILITIES OF RELEVANT PERSONS

Each Relevant Person, as defined in art. 3.1, must notify in writing Persons Closely Associated with them of the existence of conditions on the basis of which the latter are required to comply with the obligations applicable to them under art. 19 of the MAR and keep a copy of the related notification on file.

Each Relevant Person must inform the Office of the General Counsel of the name and personal details of each Person Closely Associated with them, by completing the template in Annex 1.

By signing the template in Annex 1, each Relevant Person also accepts the provisions of the Code and undertakes to promptly inform the Company, and the

[1] Art. 3, para. 1.26 of the MAR.

Office of the General Counsel acting on its behalf, of any eventual change in circumstances relating to Persons Closely Associated with them.

The Office of the General Counsel shall keep a List of Relevant Persons, including in order to exhibit such list in compliance with the applicable legislation.

5. TRANSACTIONS COVERED BY THE NOTIFICATION REQUIREMENTS FOR RELEVANT PERSONS

5.1. Definition of Transactions by Relevant Persons

Relevant Persons and Persons Closely Associated with them are required to notify the CONSOB and the Company of **all transactions** carried out on their behalf concerning:

1) Debt Financial Instruments issued by the Company;
2) derivative financial instruments linked to the instruments referred to in point (1) above; and
3) other financial instruments linked to the instruments referred to in point (1) above,

where the total value of such transactions reaches the threshold of €50,000 (or a different amount provided for in the legislation from time to time applicable) within a calendar year[2] ("**Transactions by Relevant Persons**").

Once the threshold has been reached within a calendar year, all subsequent Transactions by Relevant Persons must be notified to the Company regardless of value.

In accordance with art. 19, paragraph 7 of the MAR, Transactions by Relevant Persons to be notified shall include:

a) the pledge or loan of financial instruments by or on behalf of a Relevant Person or a Person Closely Associated with them[3];

[2] The amount of €50,000 is calculated by adding, without any offset, the value of Transactions by Relevant Persons carried out on behalf of each Relevant Person or those carried out by each of the Persons Closely Associated with them. In assessing whether or not such threshold has been reached, ESMA has clarified that transactions carried out directly by (or on behalf of) Relevant Persons are not to be added to those carried out directly by (or on behalf of) Persons Closely Associated with them.

[3] It is not necessary to notify a pledge, or a similar security interest, of financial instruments in connection with the depositing of the financial instruments in a custody account, unless and until such time that such pledge or other security interest is designated to secure a specific credit facility.

b) transactions undertaken by persons professionally arranging or executing transactions or by another person on behalf of a Relevant Person or a Person closely associated with them, including where discretion is exercised[4];

c) transactions carried out under a life insurance policy, defined in accordance with Directive 2009/138/EC of the European Parliament and the Council, where: (i) the policyholder is a Relevant Person or a Person closely associated with them; (ii) the investment risk is borne by the policyholder; and (iii) the policyholder has the power or discretion to make investment decisions regarding specific instruments in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.

5.2. FURTHER TRANSACTIONS BY RELEVANT PERSONS TO BE NOTIFIED ARE REFERRED TO IN ART. 10, PARAGRAPH 2 OF THE DELEGATED REGULATION

Procedure for notifying the CONSOB, the Company and the market

Relevant Persons shall notify the CONSOB and the Office of the General Counsel of any Transactions by Relevant Persons carried out by themselves or by Persons Closely Associated with them, using the template in Annex 2 (or the one provided for the legislation from time to time applicable), promptly and, in any event, **within 3 Working Days of the date on which the transactions were carried out**.

In compliance with the applicable legislation, within 2 Working Days from the receipt of the notification from the Relevant Persons according to the paragraph above, the Office of the General Counsel shall report to the market on the same notifications, using the same disclosure system as for regulated information, and coordinating with Investor Relations in order to make the notifications available on the Company's website within the legally required deadline. If a Relevant Person delays or fails to make, even only partially, the notification to the Office of the General Counsel, the Company may in no way be held responsible for the resulting delay in informing, or failure to inform, the market.

[4] Transactions by Relevant Persons executed by managers of a collective investment undertaking in which the Relevant Person or Person Closely Associated with them has invested, are not subject to disclosure requirements if the manager of the collective investment undertaking acts with full discretion, thereby excluding the possibility that the manager may receive any instructions or suggestions on portfolio composition directly or indirectly from investors in that collective investment undertaking.

Relevant Persons may use the Company to notify Transactions by Relevant Persons to the CONSOB according to the first paragraph of this Article. In this case, they must (i) complete the template in Annex 2 (or the one provided for by the legislation from time to time applicable) and (ii) send it to the Office of the General Counsel no later than 1 Working Day from the date of the Transaction by the Relevant Person so that to allow the Company to notify CONSOB and report to the market by the deadline under paragraph 1 of this article (3 Working Days from the date on which the transactions were carried out). If a Relevant Person delays or fails to comply, even only partially, with the requirements in points (i) and (ii) above, notification to the CONSOB of Transactions by Relevant Persons will be the sole responsibility of the Relevant Persons themselves, and the Company may in no way be held responsible for the resulting delay in informing, or failure to inform, the market.

6. ENTITY DESIGNATED TO IMPLEMENT THE CODE OF CONDUCT

The Office of the General Counsel is the entity designated to implement the Code and, in this regard, reports directly to the Company's Chairman and its Chief Executive Officer.

The Office of the General Counsel shall notify the Code to the persons to which the obligations provided for in the Code apply, and shall draw up, and regularly update, the List of Relevant Persons.

The Office of the General Counsel is also responsible for receiving, handling and disclosing information regarding Transactions carried out by Relevant Persons to the market and, when requested to do so thereby, to the CONSOB.

Relevant Persons are required to report information on the Transactions carried out by Relevant Persons, completing the template in Annex 2 and sending it to the Office of the General Counsel, in accordance with one of the following procedures:

- by e-mail to: corporategovernanceaffairs@mundys.com ;
- by Certified E-mail to: azzurra.aeroporti@pec.mundys .

The Office of the General Counsel will promptly acknowledge receipt of the notification via fax or e-mail to the Relevant Person.

7. BLACKOUT PERIODS

Relevant Persons and closely associated persons to them **are <u>prohibited</u> from directly or indirectly carrying out Transactions, on their own or another person's account, <u>in the 30 calendar days</u> prior to market announcements of the Board of Directors' approval of the Company's annual and half-year financial statements (if published)**, and prior to the publication of any further periodic financial reports whose publication is obligatory under the legislation from time to time in force.

Relevant Persons may trade during a blackout period, in accordance with art. 19, paragraph 12 and 12a of the MAR, in the event of Transactions where the beneficial interest in the relevant security does not change.

To this end, the Relevant Person and Persons closely associated with them, must demonstrate that the particular Transaction cannot be carried out at any time other than during the blackout period.Without prejudice to the above, the Company shall allow a Relevant Person to trade or to make transactions on its own account or for the account of a third party during the black-out period in the case of transactions or trade activities that do not relate to active investment decisions undertaken by the person discharging managerial responsibilities, or that result exclusively from external factors or actions of third parties, or that are transactions or trade activities, including the exercise of derivatives, based on predetermined terms.

8. SANCTIONS

Without prejudice to the legal and regulatory consequences associated with market abuse and manipulation of the market regulated by European and Italian legislation, failure to comply with the provisions of this Code constitutes a breach punishable with criminal and administrative penalties applicable to anyone who has committed such a breach, as required by the relevant European and Italian legislation.

Employees of the Company, or of its subsidiaries who fail to comply with the requirements of the Code may also be subject to disciplinary measures, without prejudice to other forms of responsibility.

For a definition of inside information, and details of how such information should be handled internally and disclosed to the market, is provided in art. 7 of the MAR and in the "Procedure for Market Announcements" adopted by the Company and available on its website at www.azzurra-aeroporti.com

9. REPORTING

The Office of the General Counsel shall, at the request of the Chairman, the Chief Executive Officer and/or the Company's internal audit bodies, prepare and send summary reports of Transactions by Relevant Persons.

10. PRIVACY

In accordance with the provisions of EU Regulation 2016/679, Legislative Decree 196/2003 and Legislative Decree 101/2018 (the "**Applicable Data Protection Legislation**"), the personal data relating to the List of Relevant Persons and the conduct of transactions relevant for the purposes of EU and/or Italian legislation will be processed by the Company in both paper and electronic form, in compliance with the Applicable Data Protection Legislation and the Company's privacy policies and in accordance with the related security measures adopted by the Company. The above data shall be processed for the purpose of compliance with the related statutory requirements.

Where required by the laws from time to time in force, the data may be communicated to public authorities and, in particular, to the CONSOB and the market.

Further information on the manner in which data is processed, the persons to which the data may be communicated and on exercising the rights granted by the Applicable Data Protection Legislation can be found in the data protection notice attached to Annex 1 to the Code. Specific requests for information may also be sent to the Company's certified e-mail account at azzurra.aeroporti@pec.mundys .

11. AMENDMENT

The Chairman and the Chief Executive Officer, acting separately from each other and with the support of the relevant departments, shall periodically assess whether or not the Code is fit for purpose and have the authority to make the necessary amendments to the Code in order to comply with any changes in the related legislation and/or internal regulations, or in the organisational structure of Azzurra Aeroporti.

ANNEX 1

SUBJECT: STATEMENT OF ACCEPTANCE OF THE CODE OF CONDUCT FOR INTERNAL DEALING

The undersigned _____, born in _____, on _____, resident in _____, tax code _____, in the capacity as _____ and, as such, defined as a Relevant Person pursuant to Azzurra Aeroporti S.p.A's Code of Conduct for Internal Dealing (the "Code"), by signing this document, declares:

- to be aware of being included in the List of Relevant Persons[5] referred to in the aforementioned Code;
- to have received a copy of the Code;
- be aware of the legal obligations incumbent upon him/her arising from the Internal Dealing legislation in force, the provisions of the Code, as well as the sanctions provided for in the event of non-compliance with such obligations.

BASED ON THE ABOVE

The undersigned also declares:

- to have read the Code and acknowledged the provisions contained therein;
- to undertake with the utmost diligence to observe the provisions contained therein;
- to have acknowledged the privacy policy provided by the Company regarding the purposes and methods of data processing contained in this declaration;
- to have communicated them to Persons Closely Associated[6] with him/her to whom the provisions are applicable under the terms of the Code itself.

In compliance with the regulatory provisions on Internal Dealing and the above-mentioned Code, the undersigned, hereby provides the following personal data

- tel. n. _____
- e-mail _____

and hereby provides the names of the Persons Closely Associated with him/her, to whom he/she undertakes to notify in writing of their obligations under the legislation from time to time in force and under the Code, and to keep a copy of the relevant notification:

[5] List of Relevant Persons and Persons Closely Associated with Relevant Persons pursuant to Article 19(5) of the Market Abuse Regulation ("MAR").

[6] Closely Associated Persons the Relevant Shareholders as defined in Article 3.1 of the Code and referred to in Article 114, paragraph 7 of the Consolidated Financial Act and Article 152-sexies, paragraph 1, letter d) of the Issuers' Regulation or Closely Associated Persons as defined in Article 3.1 of the Code and referred to in Article 3, paragraph 1, point 26) of the MAR.

Surname and name/ Company name (*)	Place and date of birth/ Company registered office (*)	Tax code	Type of relationship

(*) For legal persons.

Furthermore, the undersigned undertakes to notify the Company of any changes in the Persons Closely Associated with him/her.

Place / Date

_____ / _____

Signature

_____

CODE OF CONDUCT FOR INTERNAL DEALING PRIVACY POLICY PURSUANT TO ART. 13 OF EU REGULATION 2016/679 (GENERAL DATA PROTECTION REGULATION - "GDPR")

	IDENTITY OF THE DATA CONTROLLER	Azzurra Aeroporti S.p.A. (hereinafter "**Azzurra**" or "**Data Controller**"), with its registered office at Piazza San Silvestro 8, 00187 Rome.			
	DATA CONTROLLER'S CONTACT DATA	• Email: **privacy@mundys.com** • Indirizzo: Piazza S. Silvestro n. 8 - 00187 Roma.			
	PERSONAL DATA COLLECTED	• Identifying and/or contact information • private life (e.g., marital status) • professional life			
	PURPOSE OF PROCESSING		**LEGAL BASIS OF PROCESSING**		**PERSONAL DATA STORAGE TIMES**
1.	Comply with relevant legal obligations on Internal Dealing	Legal obligation		For a period of at least five (5) years for information published on the company's website (internal dealing)	
The prescribed period may be extended in the event of legal proceedings or to enforce a right of Azzurra. In such a case, the personal data will be kept for the duration of the proceedings, until the conclusion of the proceedings and the expiry of the period for appeal.					
	HOW DATA IS PROCESSED AND SECURITY MEASURES	Data may be processed by technological and/or paper methods and through suitable IT tools (e.g. software, hardware, applications, etc.). In this regard, the Company has controls and procedures in place to ensure the confidentiality of your data, and is constantly committed to adopting, pursuant to art. 32 of the GDPR, specific technological and organisational measures to protect data against the risk of loss, unlawful or incorrect use and unauthorised access.			
	RECIPIENTS AND CATEGORIES OF RECIPIENT OF PERSONAL DATA	In order to pursue the stated purposes of processing, personal data may be transferred to various entities, including: • the Data Controller's employees and collaborators, in their capacity as authorised data processors; • third parties contractually linked to the Data Controller, who in certain cases will act as data processors or autonomous data controllers; • banks and credit institutions;			

		• financial market, in compliance with applicable laws and regulations • judicial authorities and/or public bodies, at their express request and/or under the law, during investigations and checks in their capacity as autonomous data controllers. The data you have provided will be published in market announcements and, for example, in the specific section of Azzurra website, within the limits provided for in the applicable legislation. A full list of recipients of Data Subjects' Personal Data, including further details on the location of such recipients, is kept at the Data Controller's head office and may be consulted on request.
	**TRANSFER OF PERSONAL DATA**	Your personal data will essentially be processed within the European Union. In the event that it is necessary to transfer your data to third parties located outside the European Economic Area (EEA) for specific processing management purposes, such transfer will only take place where the European Commission has confirmed an appropriate level of data protection in the third country or where there are adequate data protection safeguards in place (e.g. EU standard contractual clauses for the transfer of data to third countries).
	**DATA SUBJECT RIGHTS**	With regard to the Data Controller, Data Subjects may at any time exercise their rights as provided for in Articles 15 *et seq*. of the GDPR, in relation to the processing of their personal data, such as, for example, right of access, correction, deletion, restriction of and opposition to processing by sending an email request to **privacy@mundys.com**.
	**RIGHT TO LODGE A COMPLAINT WITH THE DATA PROTECTION AUTHORITY**	If you believe that your personal data have been processed unlawfully, you have the right to lodge a complaint with the Italian Data Protection Authority (**https://www.garanteprivacy.it/**).
	**PROVISION OF PERSONAL DATA**	In terms of purpose, the provision of data is mandatory is obligatory for the fulfilment of the above-mentioned legal obligations, and failure to provide such data, in part or inexactly, may result in the impossibility of fulfilling the requirements dictated by the Internal Dealing regulations.
	**AUTOMATED DECISION-MAKING PROCESS**	Personal data collected will not be subject to an automated decision-making process.

DECLARATION OF HAVING READ THE PRIVACY POLICY

I, the undersigned _____ declare that I have read and understood this **Privacy Policy in accordance with Regulation (EU) 2016/679.**

I also undertake to give a copy of this privacy policy to my family members and/or relatives-in-law if personal information referring to them has been provided.

PLACE and DATE

Signature of data subject

ANNEX 2

TEMPLATE FOR THE NOTIFICATION OR REPORTING TO THE PUBLIC OF TRANSACTIONS CARRIED OUT BY RELEVANT PERSONS OR PERSONS CLOSELY ASSOCIATED WITH THEM

(in accordance with Implementing Regulation *(EU) 2016/523 issued by the Commission on 10 March 2016*)

1	**Details of the person discharging managerial responsibilities/the closely associated person**	
a)	Name	[For natural persons: name and surname.] [For legal persons: full name, including the legal form as provided for in the register where it
2	**Reason for the notification**	
a)	Position/status	[For persons discharging managerial responsibilities: the position occupied within the issuer, emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated.] [For closely associated persons, – indicate that the notification concerns a person closely associated with a person discharging managerial responsibilities; – name and surname of the Relevant Person discharging managerial responsibilities.]
b)	Initial notification /amendment	[Indicate 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	*[Code number identifying the legal person, in compliance with Begriming LEI code regulated by the ISO 17442 standard.]*
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 carried**	
a)	Description of the financial instrument, type of instrument Identification code	[Indicate the nature of the instrument: – an equity security, a debt instrument, a derivative or a financial instrument linked to an equity security 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 in Delegated Regulation (EU) 590/2017

<table>
<tr><td>b)</td><td>Nature of the transaction</td><td>[Description of the transaction type using, where applicable, the type of transaction listed in paragraph 5.1 of the Code of Conduct for Internal Dealing included in the notes (*).
As required by art. 19, para. 6, letter e) of the MAR, indicate if the transaction is linked to the</td></tr>
<tr><td>c)</td><td>Price(s) and volume(s)</td><td><table><tr><th>Price(s)</th><th>Volume(s)</th></tr><tr><td></td><td></td></tr></table>[Where more than one transaction of the same nature (purchases, sales, loans and borrowings, etc.) on the same financial instrument or emission allowance are executed on the same day and at the same place of transaction, indicate the prices and volumes of these transactions in this field, in a two column form as presented above, inserting as many lines as needed.
Using the data standards for price and quantity, including, where applicable, the price</td></tr>
<tr><td>d)</td><td>Aggregated information
– Aggregated volume
– 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 at the same place of transaction.
Using the data standard for quantity, including, where applicable, the quantity currency, as defined under the Delegated Regulation (EU) 590/2017 supplementing Regulation (EU) 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 art. 26 of Regulation (EU) 600/2014.]
[Price information:
– in the case of a single transaction, the price of the single transaction;</td></tr>
<tr><td>e)</td><td>Date of the transaction</td><td>[Date of the particular day of execution of the notified transaction.</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 of the organised trading platform outside of the Union where the transaction was executed as defined under the Delegated Regulation (EU) 590/2017 supplementing Regulation (EU) 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 art. 26 of Regulation (EU) 600/2014, or</td></tr>
</table>

(*) Relevant Persons and Persons Closely Associated with them are required to notify the CONSOB and the Company of all transactions carried out on their behalf concerning:

1) Debt Financial Instruments issued by the Company;
2) derivative financial instruments linked to the instruments referred to in point (1) above; and
3) other financial instruments linked to the instruments referred to in the previous point,

where the total value of such transactions reaches the threshold of €50,000 (or a different amount provided for in the legislation from time to time applicable) within a calendar year ("**Transactions by Relevant Persons**").

Once the threshold has been reached within a calendar year, all subsequent Transactions by Relevant Persons must be notified to the Company regardless of value.

In accordance with art. 19, paragraph 7 of the MAR, notifiable Transactions by Relevant Persons include:

a) the pledge or loan of financial instruments by or on behalf of a Relevant Person or a Person Closely Associated with them;
b) transactions undertaken by persons professionally arranging or executing transactions or by another person on behalf of a Relevant Person or a Person closely associated with them, including where discretion is exercised;
c) transactions carried out under a life insurance policy, defined in accordance with Directive 2009/138/EC of the European Parliament and the Council, where: (i) the policyholder is a Relevant Person or a Person closely associated with them; (ii) the investment risk is borne by the policyholder; and (iii) the policyholder has the power or discretion to make investment decisions regarding specific instruments in that life insurance policy or to execute transactions regarding specific instruments for that life insurance policy.

Art. 10, paragraph 2 of the Delegated Regulation also provide that the following Transactions by Relevant Persons must be notified:

a) the acquisition, disposal, short sale, subscription or exchange;
b) the acceptance or exercise of a share option, including of a share option granted to Relevant Persons or employees as part of their remuneration package, and the disposal of equity securities stemming from the exercise of a share option;
c) the entry into or exercise of equity swaps;
d) transactions in or related to derivatives, including cash-settled transactions;
e) the entry into a contract for difference on a financial instrument issued by the Company
f) the acquisition, disposal or exercise of rights, including put and call options, and warrants;
g) subscription for a capital increase or a debt instrument;
h) transactions in derivatives and financial instruments linked to debt instruments issued by the Company, including credit default swaps;
i) transactions conditional on the occurrence of certain 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 bonds convertible into equity securities;
k) gifts and donations made or received, and inheritances received;
l) transactions executed in index-linked products, baskets and derivatives if provided for by art. 19 of the MAR;
m) transactions executed in equity securities or units of investment funds, including alternative investment funds ("**AIFs**"), pursuant to art. 1 of Directive 2011/61/EU of the European Parliament and the Council, if provided for by art. 19 of the MAR;
n) transactions executed by the manager of an AIF in which the Relevant Person or a Person Closely Associated with them has invested, if provided for by art. 19 of the MAR;
o) transactions executed by a third party under an asset management or individual portfolio mandate on behalf or for the benefit of a Relevant Person and/or a Person Closely Associated with them;
p) the borrowing or lending of equity securities or debt instruments issued by the Company or derivatives or other financial instruments linked thereto.