

**PROCEDURE FOR KEEPING AND UPDATING THE
LISTS
OF PERSONS HAVING ACCESS TO RELEVANT
INFORMATION AND INSIDE INFORMATION**

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ARTICLE 1 – PRELIMINARY PROVISIONS

1.1 In abidance by the provisions set out in the MAR and in the relating Implementing Regulation EU No. 1210/2022, the Bank establishes the Insider List, i.e. the list of persons who, by virtue of their employment or profession or due to the duties discharged, have access to Inside Information of the Bank and/or its subsidiaries.

1.2 In addition to the Insider List, the Bank establishes the so called RIL, i.e. the list of persons who, by virtue of their employment or profession or due to the duties discharged, have access to Relevant Information concerning the Bank and/or its subsidiaries.

1.3 This Lists Procedure governs conduct rules, roles and responsibilities of the persons and company's organizational structures involved in the keeping and updating of the Insider List and the RIL.

1.4 The second level Implementing Measures approved by the Company's Board of Directors, as updated from time to time pursuant to article 18 of the Procedure, form an integral part of the Lists Procedure (as well as of the Procedure).

1.5 The Lists Procedure takes into account the approaches and directions, even of interpretation nature, from time to time provided in the matter of marker abuse by Consob (among which, without limitation, the Guidelines) and, at EU level, by the ESMA (e.g., ESMA QS&AS).

1.6 In particular, ANNEX 1 – Regulations 1 ("*Regulations*") to the Lists Procedure sets out a description of the rules the addressees thereof shall be aware of and comply with together with the Procedure, to which this document is functionally and closely connected.

1.7 The Banks identified in the Chief Executive Officer the so called "Inside Information Management Function" (IIMF) as per the Guidelines, entrusting to the competence thereof the management and application of this Lists Procedure and of the Procedure.

ARTICLE 2 – DEFINITIONS AND INTERPRETATIONS

2.1 Definitions

Bank or Parent Company	Company or	BFF Bank S.p.A., parent company of the BFF Group listed on the Mercato Telematico Azionario managed by Borsa Italiana S.p.A.
Board of Statutory Auditors:		the Parent Company's Body with " <i>control functions</i> " which monitors compliance with legal, regulatory and statutory
Board of Directors:		the Company's Body of the Parent Company with " <i>strategic supervision functions</i> " which is entrusted with management
Borsa:		Borsa Italiana S.p.A..
Chief Executive Officer:		the " <i>body with management functions</i> " of the Parent Company, i.e. the member of the Board of Directors of the Parent Company to whom ordinary management duties, namely the execution of the guidelines resolved in the exercise of the strategic supervision function, are delegated by the Board of Directors of the Parent Company.
Compliance & AML Function:		company structure in charge of the company function of controlling anti-money laundering and terrorism financing
Company's Bodies:		collectively, the Board of Directors, the Chief Executive Officer and the Board of Statutory Auditors.

Consob:	the <i>Commissione Nazionale per le Company e la Borsa</i> .
Derivative Financial Instruments:	the Financial Instruments referred to in Annex I, section C, points from 4 to 10 and the financial instruments of art. 1-bis of the TUF.
Financial Instruments:	pursuant to art. 3, paragraph 1, No. 1) of the MAR, the Bank's financial instruments, as defined in article 4, paragraph 1, item 15), of Directive 2014/65/UE (MiFID II) and referred to in section C of Annex I of said Directive ¹ .
Financial Services Act or TUF:	Legislative Decree No. 58/1998, and subsequent amendments and supplements.
Supervisory Authority:	Authorities that, in application of local sector regulations, carry out supervisory activities, such as, for instance, Bank of Italy and Consob.

¹ Section C of Annex I to the MiFID II Directive lays down as Financial Instruments the following instruments: (i) Transferable securities, (ii) Money-market instruments, (iii) Units in collective investment undertaking, (iv) Options, 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, (v) 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, (vi) 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, (vii) 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, (viii) Derivative instruments for the transfer of credit risk, (ix) Financial contracts for differences, (x) 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; (xi) Emission allowances consisting of any units recognised for compliance with the requirements of Directive 2003/87/EC (Emissions Trading Scheme).

Group:	collectively, the Bank and the companies directly or indirectly controlled thereby pursuant to art. 2359, first subsection, no. 1 and no. 2, of the Italian civil Code.
Guidelines:	the “ <i>Guidelines in the matter of Management of Inside Information</i> ” No. 1 of 13 October 2017, published by Consob after the public consultation on the amendments to Consob
IIMF (Inside Information Management Function):	the Chief Executive Officer, in his role as individual entrusted with the management and application of this Lists Procedure and of the Procedure and, in particular, of the organizational process for the management of the duties relating to the publication of Inside Information as well as of the Insider List. In case of proven absence or impediment of the Chief Executive Officer, the IIMF is acquitted, for the interim period strictly necessary, by the President.
IICOF (Inside Information Competent Organizational	each company structure or function specifically identified pursuant to the Implementing Measures in relation to each Type of Relevant Information or Inside Information.

<p>Implementing Measures:</p>	<p>the implementing measures approved by the Company's Board of Directors together with this Lists Procedure and the Procedure, as from time to time updated pursuant to Article 18 ("<i>Amendments and Supplements</i>") of the Procedure, setting out:</p> <ul style="list-style-type: none"> a) the Types of Relevant Information; b) the competent IICOF in relation to each Type of Relevant Information or Inside Information; as well as c) other operational measures useful in order to facilitate the implementation of the Lists Procedure and the Procedure by the Group's employees, in compliance with the applicable legislation.
<p>Implementing Regulation (EU) 2022/1210</p>	<p>the EU Commission Regulation of 13 July 2022 laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with the MAR.</p>
<p>Inside Information:</p>	<p>pursuant to art. 7 ("<i>Inside Information</i>") of the MAR, that information of a precise nature which has not been made public relating, directly or indirectly, to the Bank or one or more Financial Instruments, which, if it were made public would be likely to have a significant effect on the prices of those Financial Instruments or on the prices of related Derivative Financial Instruments².</p>

² Please note that, pursuant to article 7 ("*Inside Information*") del MAR, an information is of "precise nature" if: (a) it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event

<i>Insider List:</i>	the register including the list of those who have access to Inside Information and with whom the Bank or a Group company holds a professional collaboration relation (whether a subordinated employment or other) and who, in carrying out specific duties, have access to Inside Information (such as, without limitation, consultants, accountants or rating agencies) as well Permanent Insiders.
<i>Issuers Regulation:</i>	the Regulation adopted with Consob resolution on 14 May 1999, No. 11971, concerning the issuers regime.
<i>Lists:</i>	collectively, the RIL and the Insider List.
<i>Lists Procedure:</i>	this procedure.
<i>MAR:</i> <i>MAR:</i>	Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (<i>Market Abuse Regulation - MAR</i>) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC, entered into force on 3 July 2016.

which has occurred or which may reasonably be expected to occur; (b) it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or specified event as per letter a) above on the prices of the Financial Instruments or related derivative financial instruments. In this respect, in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information. An intermediate step in a prolonged process is deemed to be Inside Information if it meets the criteria set by the legislation, also of regulatory nature, with reference to inside information. In particular, according with the indications of Recital No. 17 of the MAR, "Information which relates to an event or set of circumstances which is an intermediate step in a protracted process may relate, for example, to the state of contract negotiations, terms provisionally agreed in contract negotiations, the possibility of the placement of financial instruments, conditions under which financial instruments will be marketed, provisional terms for the placement of financial instruments, or the consideration of the inclusion of a financial instrument in a major index or the deletion of a financial instrument from such an index".

<i>Person in Charge:</i>	the Head of the Parent Company's Compliance Function, in charge of keeping, managing and updating the Lists pursuant to the Lists Procedure.
<i>Permanent Insiders</i>	all individuals who, by virtue of their function or office, have access at all times to all Inside Information.
<i>Permanent Section:</i>	the Insider List section where Permanent Insiders are included.
<i>Procedure:</i>	the " <i>Internal procedure for the management and external disclosure of Inside Information</i> ", as approved by the Board of Directors of the Bank.
<i>Relevant Information:</i>	single information that may, at a later, even soon, moment, assume the nature of Inside Information.
<i>RIL:</i>	the " <i>Relevant Information List</i> ", i.e. the list setting out the list of persons having access to each Relevant Information.
<i>Single Section:</i>	the section where persons having access – on a regular or occasional basis – to the same single Relevant Information, in case of the RIL, or to the same single Inside Information, in case of the Insider List are included.
<i>Types of Relevant Information:</i>	Types (flows) of information eligible to become Inside Information.

2.2 Interpretations

2.2.1 In this Lists Procedure:

a) all terms with capital letter, where not otherwise specified, shall have the meaning assigned thereto in the definitions set out in Section ("*Definitions*") above;

b) where the context of the sentence so requires, terms defined in singular form shall include the plural and vice versa;

c) the expressions "including", "includes" or similar shall be deemed to introduce mere examples as if always followed by "without limitation";

d) the expression "chief executive officer of the Group company" (or equivalent) shall be deemed in the broad sense, such as to include the chairman of the ordinary management body howsoever called (e.g., the chairman of the management board of BFF Polska S.A.);

e) all legal and regulatory references as well as references to guidance and indications, also interpretations, published in the matter of market abuse by the competent authorities are deemed to be always made to the most recently intervened amendments and/or updates;

f) for the purpose of this Lists Procedure "control" shall mean corporate control (in the meaning of article 2359 of the Italian Civil Code, or, in case of listed companies, in the meaning of article 93 of the TUF) and the verb "to control" and the terms derived therefrom shall have a meaning consistent with that of "control".

ARTICLE 3 – STRUCTURE AND CONTENT OF THE LISTS

3.1 General provisions

3.1.1 The Company establishes, manages and keeps constantly updated:

a) the RIL, whose purpose consists in monitoring the circulation of Relevant Information within the Group as well as the individuals having access thereto from time to time; and

b) the Insider List, protective measure aimed at segregating the Inside Information, avoiding that individuals (either internal or external) to the Company who shall not access it in the normal performance of their professional activity or role, may have access thereto.

3.1.2 The RIL continues to be fed until the Relevant Information included therein is qualified as Inside Information pursuant to Article 6 (*“Assessment and Identification of Relevant Information and Inside Information”*), Section 6.4 (*“Identification of an Inside Information”*) of the Procedure, in which case the Person in Charge closes the Single Section of the RIL dedicated to said information and opens the corresponding Single Section of the Insider List.

3.2 Structure of the Lists

3.2.1 The Lists are kept in electronic format and consist in an electronic data bank, ensuring:

- accuracy of information included therein;
- certainty of the entry date, integrity of the relating content and confidentiality of data entered;
- access to and retrieval of information with limitation only to clearly identified individuals who must have access thereto due to the nature of the respective function or office;
- access to and retrieval of previous versions of the lists.

3.3 Inclusions in the RIL

3.3.1 Inclusions in the RIL are made – on instructions of IIMF – by the Person in Charge per access, on an occasional or regular basis, to each Relevant Information (Single Section/s).

3.3.2 Every Single Section of the RIL is broken down in sub-sections, one per each Relevant Information. Every time a new Relevant Information is identified a new and specific Single Section of the RIL is added.

3.3.3 The Single Sections of the RIL include individuals who have access to a Relevant Information, as reported to the IIMF by the competent IICOF, pursuant to Article 6 (“*Assessment and Identification of Relevant Information and Inside Information*”), Section 6.3 (“*Subsequent actions to the identification of a Relevant Information*”), Paragraphs 6.3.1, 6.3.2 and 6.3.3 of the Procedure.

3.4 Inclusions in the Insider List

3.4.1 Inclusions in the Insider List are made – on instructions of the IIMF – by the Person in Charge:

- per access, on a permanent basis, to all Inside Information (Permanent Section);
- per access, on an occasional or regular basis, to each Inside Information (Single Section/s).

3.4.2 The Permanent Section includes those individuals who have access at all times to all Inside Information, i.e. Permanent Insiders. Details of Permanent Insiders entered in the Permanent

Section are not entered in the Single Sections of the *Insider List*.

3.4.3 The Chief Executive Officer, since individual having access at all times to all Inside Information, as well as the other individuals – identified by the Chief Executive Officer – who, based on the Company's internal operational practice, have access at all time to all Inside Information, are included in the Permanent Section.

3.4.4 Every Single Section of the Insider List is broken down in sub-sections, one per each Inside Information. With reference to each individual included in the Single Section, it is specified whether he had access to the Inside Information on a regular or occasional basis. New and specific Single Sections are added to the Insider List upon identification of new Inside Information.

3.4.5 The Sin Sections of the Insider List include individuals who have access to each Inside Information, as reported to the IIMF from the IICOF, pursuant to Article 6 ("*Assessment and Identification of Relevant Information and Inside Information*"), Section 6.5 ("*Subsequent actions to the identification of an Inside Information*"), Paragraphs 6.5.1 (b) e 6.5.2 (b) of the Procedure.

3.5 Data collected in the Lists with reference to included individuals

3.5.1 The Lists, as regards each individual included therein, set out the following information:

- (i) number and date of the entry;
- (ii) personal data (surname, first name, complete residence address and tax code or corporate name, registered office, incorporation date, enrolment number with the Company's Register and tax code). In case of legal persons, entities or associations of professionals, also personal data of the person capable of identifying individuals with specific access to a Relevant Information or an Inside Information are included, without prejudice to the provisions of Article 6 ("*Assessment and Identification of Relevant Information and Inside Information*"), Section 6.3 ("*Subsequent actions to the identification of a Relevant Information*") Paragraph

6.3.3 and Section 6.5 ("*Subsequent actions to the identification of an Inside Information*")

Paragraph 6.5.2 of the Procedure;

- (iii) business and private telephone number;
- (iv) reference company/entity, in case of natural persons;
- (v) description of the reasons for the inclusion in the RIL or Insider List (as applicable);
- (vi) date and time at which that person obtained access to the Relevant Information (RIL) or the Inside Information (Insider List); in case of Permanent Insider, date and time of the inclusion in the Permanent Section;
- (vii) date on which the notice of occurred inclusion has been served;
- (viii) date on which the information already included in the RIL or Insider List (as applicable) has been updated;
- (ix) date on which the notice of occurred update of the information included in the RIL or Insider List (as applicable) has been served;
- (x) date and time at which the individual ceased to have access to the Relevant Information (RIL) or the Inside Information (Insider List);
- (xi) date of erasure from the RIL or Insider List (as applicable);
- (xii) reason for erasure from the RIL or Insider List (as applicable);
- (xiii) date on which the notice of occurred erasure from the RIL or Insider List (as applicable) has been served.

ARTICLE 4 – ROLES AND RESPONSIBILITIES

4.1 The inclusion of a new name in the Lists and the relating updates, including erasure, is made by the Person in Charge, who acts solely upon instructions transmitted – as laid down by Article 6 (“*Assessment and Identification of Relevant Information and Inside Information*”), Section 6.3 (“*Subsequent actions to the identification of a Relevant Information*”) or 6.5 (“*Subsequent actions to the identification of an Inside Information*”) of the Procedure - by the IIMF which, in turn, receives them from the competent IICOF. The IICOF makes these indications by sending to the IIMF and to the Subject in charge, by e-mail, of the duly completed and undersigned form attached under Annex 5 (“*Inclusion/update/erasure request*”) to this List Procedure or by other means communicated from time to time by the Subject in charge.

4.2 In discharging his duties, the Person in Charge may avail himself of collaborators, also external, who will operate under his responsibility.

4.3 Each competent IICOF, by operational area, at Group level, is accountable for the communication to the IIMF (Person in Charge), of the individuals who shall be included in the Lists.

ARTICLE 5 – UPDATE OF THE LISTS

5.1 The Lists shall be updated without delay by the Person in Charge in the following circumstances:

- i. where a variation of the reasons for the inclusion of an individual already appearing in the RIL or Insider List (as applicable) occurs, including the case where the inclusion shall be moved from one Section to another within one of the Lists or from the RIL to the Insider List;
- ii. where there is an additional individual having access to a Relevant Information or an Inside Information and who, accordingly, shall be included in the RIL or Insider List, respectively;
- iii. where it is necessary to annotate that one individual included in the RIL or Insider List has no

longer access to Relevant Information or Inside Information, specifying the date as of which the access has ceased.

5.2 Each update specifies the date and time at which the event triggering the need for the update has taken place.

5.3 In order to assure that the Lists are kept constantly updated by the Person in Charge, the competent IICOF informs the IIMF, also of every useful information on the evolution of Relevant Information and Inside Information, as specified in Article 6 (*“Assessment and Identification of Relevant Information and Inside Information”*), Section 6.3 (*“Subsequent actions to the identification of a Relevant Information”*), Paragraph 6.3.2 and Section 6.5 (*“Subsequent actions to the identification of an Inside Information”*), Paragraph 6.5.1(b) of the Procedure.

ARTICLE 6 – MODALITIES TO KEEP AND MAINTAIN THE LISTS

6.1 The Lists are kept on digital support at the care of the Person in Charge, with criteria and modalities such as to ensure easy access, management, consultation, retrieval and printing of the information and data contained therein. Said criteria are inspired by principles of traceability of information and confidentiality of data and are compliant with the applicable legislation, also of regulatory nature, as applicable from time to time.

6.2 The Person in Charge keeps the Lists and, without delay, updates them, based on what has been reported to IIMF from each competent IICOF by operational area at Group level, in compliance with the provisions adopted by the Bank in the matter of protection of processed personal data.

6.3 The Person in Charge cooperates with the Supervisory Authorities in case of requests of data and inspections and transmits, as soon as possible, the Lists to Consob, on request of the latter, according with the modalities provided for by the legislation in force from

time to time³.

6.4 IIMF with the Person in Charge shall:

- i.* monitor on an ongoing basis the correct management of the Lists contents;
- ii.* verify that individuals included in the Lists are promptly informed of the updates concerning them.

6.5 The IIMF with the support of the Person in Charge ensures that data included in the Lists, in relation to each individual included therein, are retained for a period of 5 years starting from the date on which the circumstances that triggered the relevant inclusion in one of the mentioned Lists or the update of the details relating thereto, have ceased.

ARTICLE 7 – DISCLOSURE TO INDIVIDUALS INCLUDED IN THE LISTS

7.1. Immediately after the inclusion in the Insider List, the IIMF with the support of the Person in Charge informs the newly included individual:

- i.* of his inclusion in the Insider List;
- ii.* of the obligations deriving from having access to Inside Information;
- iii.* of the sanctions established in case of commission of insider dealing and market manipulation offences or in case of unauthorized dissemination of inside information.

7.2. The disclosure is given with communication in accordance with the template under ANNEX 2 – Disclosure relating to the inclusion in the Insider List, sent via e-mail. The Person in Charge discloses to Permanent Insiders the opening of a Single Section in the Insider List, via e-mail

³ Consob, with Notice No. 0061330 of 1 July 2016, announced that the transmission to Consob of the Insider List, or of the specific Sections indicated in the request, must be made in writing, via PEC, to the address consob@PEC.consob.it, following any further indications in the request.

communication.

The IIMF with the support of the Person in Charge further informs the individuals included in the Insider List of any updates relating thereto, with communication in accordance with the template under ANNEX 3 – Disclosure relating to the update of data included in the Insider List”, sent via e-mail, as well as of any erasure thereof from the Insider List, with communication in accordance with the template under ANNEX 4 – “*Disclosure relating to the erasure from the Insider List*”, also sent via e-mail.

7.3 Immediately after the inclusion in the RIL, the IIMF with the support of the Person in Charge takes care of informing the newly included individual of his inclusion in the RIL as well as of the obligations deriving from having access to Relevant Information, sending via e-mail the communication as per ANNEX 2-bis – “*Disclosure relating to the inclusion in the RIL*”. The Person in Charge further informs the included individual of his possible erasure from the RIL with communication in accordance with the template under ANNEX 6 – *Disclosure relating to the erasure from the RIL*”, also sent via e-mail.

7.4 The IIMF, with the support of the Person in Charge delivers to the individuals included in the Lists, on their request, a paper copy of the information concerning them contained in the Lists.

ARTICLE 8 – COMMUNICATIONS TO THE PERSON IN CHARGE

8.1. Each individuals included in the Lists shall: (i) return a copy of this Lists Procedure, duly signed for receipt or otherwise accepted through other equivalent modalities; and (ii) comply with the provisions applicable thereto, as contained in this Lists Procedure.

ARTICLE 9 – AMENDMENTS AND SUPPLEMENTS

9.1. Without prejudice to the provisions of Paragraph o below, amendments and/or supplements to this Lists Procedure require the approval of the Board of Directors, except for

amendments and/or supplements proving necessary or in any case appropriate following legal or regulatory measures, or organisational changes in the Company possibly approved by the Chief Executive Officer, who will inform the Board of Directors.

9.2 In accordance with the provisions of Article 18 (*"Amendments and Supplements"*) of the Procedure, also the amendment and periodic update of the Implementing Measures are referred to the competence of the Chief Executive Officer. The Chief Executive Officer shall inform the Board of Directors of the amendments applied.

9.3 The Chief Executive Officer periodically assesses the implementation and effectiveness of the management, processing and communication process of Relevant Information and Inside Information, so to identify any need to apply amendments to the Lists Procedure and/or the Procedure.

ARTICLE 10 – SANCTIONS

10.1. The infringement by the Bank of the provisions in the matter of corporate disclosure triggers, unless the fact constitutes offence, an administrative liability thereof.

10.2. Insider dealing and market manipulation constitute offences punishable with criminal and administrative sanctions to those who have committed them and may give rise to situations triggering the administrative liability of the issuer.

10.3. Furthermore, the non-fulfilment of obligations and prohibitions prescribed by this Lists Procedure by the Bank's employees may be of relevance for the application of possible disciplinary sanctions, without prejudice to any other liability of whatever nature.

ANNEX 1 - Regulations

REGULATION (EU) NO. 596/2014 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL OF 16 APRIL 2014

Art. 18

(Insider lists)

1. Issuers or any person acting on their behalf or on their account, shall:
 - a) draw up a list of all persons who have access to inside information and who are working for them under a contract of employment, or otherwise performing tasks through which they have access to inside information, such as advisers, accountants or credit rating agencies (insider list);
 - b) promptly update the insider list in accordance with paragraph 4; and
 - c) provide the insider list to the competent authority as soon as possible upon its request.
2. Issuers or any person acting on their behalf or on their account, shall take all reasonable steps to ensure that any person on the insider list acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information.

Where another person acting on behalf or on the account of the issuer assumes the task of drawing up and updating the insider list, the issuer remains fully responsible for complying with this Article. The issuer shall always retain a right of access to the insider list.

3. The insider list shall include at least:
 - a) the identity of any person having access to inside information;
 - b) the reason for including that person in the insider list;
 - c) the date and time at which that person obtained access to inside information; and
 - d) the date on which the insider list was drawn up.

4. Issuers or any person acting on their behalf or on their account shall update the insider list promptly, including the date of the update, in the following circumstances:
 - a) where there is a change in the reason for including a person already on the insider list;
 - b) where there is a new person who has access to inside information and needs, therefore, to be added to the insider list; and
 - c) where a person ceases to have access to inside information.

Each update shall specify the date and time when the change triggering the update occurred.

5. Issuers or any person acting on their behalf or on their account shall retain the insider list for a period of at least five years after it is drawn up or updated.

6. Issuers whose financial instruments are admitted to trading on an SME growth market shall be exempt from drawing up an insider list, provided that the following conditions are met: a) the issuer takes all reasonable steps to ensure that any person with access to inside information acknowledges the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information; and b)

the issuer is able to provide the competent authority, upon request, with an insider list.

7. This Article shall apply to issuers who have requested or approved admission of their financial instruments to trading on a regulated market in a Member State or, in the case of an instrument only traded on an MTF or an OTF, have approved trading of their financial instruments on an MTF or an OTF or have requested admission to trading of their financial instruments on an MTF in a Member State.
8. Paragraphs 1 to 5 of this Article shall also apply to: a) emission allowance market participants in relation to inside information concerning emission allowances that arises in relation to the physical operations of that emission allowance market participant; b) any auction platform, auctioneer and auction monitor in relation to auctions of emission allowances or other auctioned products based thereon that are held pursuant to Regulation (EU) No 1031/2010.
9. In order to ensure uniform conditions of application of this Article, ESMA shall develop draft implementing technical standards to determine the precise format of insider lists and the format for updating insider lists referred to in this Article.

COMMISSION IMPLEMENTING REGULATION (EU) 2022/1210 OF 13

JULY 2022

Art. 2

(Format for drawing up and updating the insider list)

1. Issuers, emission allowance market participants, auction platforms, auctioneers and auction monitor, or any person acting on their behalf or on their account, shall ensure that their insider list is divided into separate sections relating to different inside information. New

sections shall be added to the insider list upon the identification of new inside information, as defined in Article 7 of Regulation (EU) No 596/2014.

Each section of the insider list shall only include details of individuals having access to the inside information relevant to that section.

2. The persons referred to in paragraph 1 may insert a supplementary section into their insider list with the details of individuals who have access at all times to all inside information ('permanent insiders').

The details of permanent insiders included in the supplementary section referred to in the first subparagraph shall not be included in the other sections of the insider list referred to in paragraph 1.

3. The persons referred to in paragraph 1 shall draw up and keep the insider list up to date in an electronic format in accordance with Template 1 of ANNEX I - Regulations.

Where the insider list contains the supplementary section referred to in paragraph 2, the persons referred to in paragraph 1 shall draw up and keep that section updated in an electronic format in accordance with Template 2 of ANNEX I - Regulations.

4. The electronic formats referred to in paragraph 3 shall at all times ensure:
 - a) the confidentiality of the information included by ensuring that access to the insider list is restricted to clearly identified persons from within the issuer, emission allowance market participant, auction platform, auctioneer and auction monitor, or any person acting on their behalf or on their account that need that access due to the nature of their function or position;

- b) the accuracy of the information contained in the insider list;
 - c) the access to and the retrieval of previous versions of the insider list.
5. The insider list referred to in paragraph 3 shall be submitted using the electronic means specified by the competent authority. Competent authorities shall publish on their website the electronic means to be used. Those electronic means shall ensure that completeness, integrity and confidentiality of the information are maintained during the transmission.

ANNEX 2 – Disclosure relating to the inclusion in the Insider List

Milan, [•]

Reference: Inclusion in the Insider List

Dear [SURNAME, NAME],

in compliance with the provisions of art.18 of Regulation (EU) no. 596/2014 and of the Commission Implementing Regulation (EU) 1210/2022, BFF Bank S.p.A. (the “**Bank**”) drew up the list of persons having access to inside information as per art. 7 of Regulation (EU) no. 596/2014 (hereafter “**Insider List**” and “**Inside Information**”).

In my capacity as Person in Charge of keeping and updating the Insider List, I inform You that on [•] You have been included in the Insider List, for the following reason: [*specify reason*].

I remind You that those who have access to Inside Information shall comply with (i) the “*Procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information*” (Annex A), (ii) the legislation illustrated in Annex 1 to said procedure as well as (iii) the prescriptions laid down in the “*Internal procedure for the management and external disclosure of Inside Information*” adopted by the Company (Annex B).

To this end, we specify that Inside Information shall mean, pursuant to art. 7 of Regulation (EU) no. 596/2014, that information of a precise nature which has not been made public relating, directly or indirectly, to BFF Bank S.p.A., or its financial instruments, which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the prices of related derivative financial instruments.

Pursuant to the same article, the Company must disclose Inside Information concerning the Company itself and its financial instruments without delay to the public and the delay of said fulfilment is only permitted, on the responsibility of the Company, under specific circumstances and on the conditions set by the legislation in force, provided that the Company is able to ensure the confidentiality of the same Information.

Where Inside Information is disclosed to a third party that is not bound by a confidentiality obligation, the Company must disclose it to the public in full, contextually in case of intentional dissemination and without delay in case of unintentional dissemination.

Compliance by individuals included in the Insider List with the confidentiality obligations on Inside Information they have access to is therefore of essence.

In this respect, please note that it is the duty of each individual included in the Insider List, to ensure the traceability of the management of Inside Information in his/her hands and the relating confidentiality within his/her sphere of activity and responsibility, starting from the time at which, with whatever means (i.e. by correspondence, on occasion of meetings and/or otherwise), he/she has come into possession thereof.

Should the included individual disclose, also unintentionally, Inside Information to persons not possessing it (also where they are already included in the Insider List for other reasons) he/she must immediately inform the Chief Executive Officer with a copy to the Person in Charge of keeping and updating the Insider List.

Without prejudice to the possibility for the Bank to seek compensation for every damage and/or liability that may derive thereto from behaviours in breach of the obligations referred to in this Disclosure, the non-fulfilment thereof triggers:

i. for subordinated employees, the imposition of disciplinary sanctions provided for by the legal provisions in force and the applicable collective labour agreements,

- ii. for any other collaborator, the termination – also without advance notice – of the relationship;
- iii. for directors and statutory auditors of the Company, the Board of Directors may propose at the following Shareholders' Meeting the dismissal for just cause of the defaulting board member or statutory auditor.

We invite You to keep the Bank constantly updated on possible variations relating to the information specified in this document, promptly reporting possible changes to BFF Bank S.p.A. to the following e-mail address: (Registroinsider@bff.com) or via fax to the number +39 02 49905316.

This communication, duly signed for acknowledgement and acceptance, shall be returned within 7 (seven) days of receipt to BFF Bank S.p.A. to the following e-mail address: rap-bffbank@computershare.it or via fax to the number +39 02 4677 6850 with a copy to the address Registroinsider@bff.com.

Personal details necessary for inclusion in the List and the relating updates will be processed in accordance with the provisions laid down by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("*General Data Protection Regulation*", hereafter "GDPR" or "Regulation").

For any information or clarification relating to this disclosure and its application please refer to the Person in Charge of keeping and updating the Insider List.

Sanctions

We include here below a summary description of the sanctions laid down by the European Regulation no. 596/2014 of the European Parliament and the Council of 16 April 2014 and by the TUF for offences of (i) insider dealing and (ii) market manipulation.

- **EUROPEAN REGULATION NO. 596/2014**

Administrative sanctions and other administrative measures (article 30)

1. Without prejudice to any criminal sanctions and without prejudice to the supervisory powers of competent authorities, Member States shall, in accordance with national law, provide for competent authorities to have the power to take appropriate administrative sanctions and other administrative measures in relation to at least the following infringements:
 - a) infringements of Articles 14 and 15, Article 16(1) and (2), Article 17(1), (2), (4) and (5), and (8), Article 18(1) to (6), Article 19(1), (2), (3), (5), (6), (7) and (11) and Article 20(1); and

- b) failure to cooperate or to comply with an investigation, with an inspection or with a request as referred to in Article 23(2).

Member States may decide not to lay down rules for administrative sanctions as referred to in the first subparagraph where the infringements referred to in point (a) or point (b) of that subparagraph are already subject to criminal sanctions in their national law.

2. Member States shall, in accordance with national law, ensure that competent authorities have the power to impose at least the following administrative sanctions and to take at least the following administrative measures in the event of the infringements referred to in point (a) of the first subparagraph of paragraph 1: a) an order requiring the person responsible for the infringement to cease the conduct and to desist from a repetition of that conduct; b) the disgorgement of the profits gained or losses avoided due to the infringement insofar as they can be determined; c) a public warning which indicates the person responsible for the infringement and the nature of the infringement; d) withdrawal or suspension of the authorization of an investment firm; e) a temporary ban of a person discharging managerial responsibilities within an investment firm or any other natural person, who is held responsible for the infringement, from exercising management functions in investment firms; f) in the event of repeated infringements of Article 14 or 15, a permanent ban of any person discharging managerial responsibilities within an investment firm or any other natural person who is held responsible for the infringement, from exercising management functions in investment firms; g) a temporary ban of a person discharging managerial responsibilities within an investment firm or another natural person who is held responsible for the infringement, from dealing on own account; h) maximum administrative pecuniary sanctions of at least three times the amount of the profits gained or losses avoided because of the infringement, where those can be determined; i) in respect of a natural person, maximum administrative pecuniary sanctions of at least: i) for infringements of Articles 14 and 15, EUR 5 000 000 or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014; ii) for

infringements of Articles 16 and 17, EUR 1 000 000 or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014; and iii) for infringements of Articles 18, 19 and 20, EUR 500 000 or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014; and j) in respect of legal persons, maximum administrative pecuniary sanctions of at least: i) for infringements of Articles 14 and 15, EUR 15 000 000 or 15 % of the total annual turnover of the legal person according to the last available accounts approved by the management body, or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014; ii) for infringements of Articles 16 and 17, EUR 2 500 000 or 2 % of its total annual turnover according to the last available accounts approved by the management body, or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014; and iii) for infringements of Articles 18, 19 and 20, EUR 1 000 000 or in the Member States whose currency is not the euro, the corresponding value in the national currency on 2 July 2014.

3. For the purposes of points (j)(i) and (ii) of the first subparagraph, where the legal person is a parent undertaking or a subsidiary undertaking which is required to prepare consolidated financial accounts pursuant to Directive 2013/34/EU (1), the relevant total annual turnover shall be the total annual turnover or the corresponding type of income in accordance with the relevant accounting directives – Council Directive 86/635/EEC (2) for banks and Council Directive 91/674/EEC (3) for insurance companies – according to the last available consolidated accounts approved by the management body of the ultimate parent undertaking.
4. Member States may provide that competent authorities have powers in addition to those referred to in paragraph 2 and may provide for higher levels of sanctions than those established in that paragraph.

TUF

Abuse or unlawful disclosure of inside information.

Recommending or inducing others to commit insider dealing inside information (article 184 and article 187-bis)

Criminal sanctions

Imprisonment for between two and twelve years and a fine of between Euro twenty thousand and Euro three million shall be imposed on any person who, possessing inside information by virtue of his membership of the administrative, management or supervisory bodies of an issuer, his holding in the capital of an issuer or the exercise of his employment, profession, duties, including public duties, or position:

- (a) buys, sells or carries out other transactions involving, directly or indirectly, for his own account or for the account of a third party, financial instruments using such information;
- (b) discloses such information to others outside the normal exercise of his employment, profession, duties or position or a market survey conducted pursuant to article 11 of Regulation (EU) no. 596/2014;
- (c) recommends or induces others, on the basis of such information, to carry out any of the transactions referred to in paragraph a).

The punishment referred to in paragraph 1 shall apply to any person who, possessing inside information by virtue of the preparation or execution of criminal activities, carries out any of the actions referred to in paragraph 1.

Courts may increase the fine up to three times or up to the larger amount of ten times the product of the crime or the profit therefrom when, in view of the particular seriousness of the offence, the personal situation of the guilty party or the magnitude of the product of the crime or the profit therefrom, the fine appears inadequate even if the maximum is applied.

Administrative sanctions

Without prejudice to the judicial sanctions applicable when the act constitutes a criminal offence, a pecuniary administrative sanction of between twenty thousand euro and five million euro shall be imposed on anyone who infringes the law against insider trading and unlawful communication of inside information, as per article 14 of Regulation (EU) no. 596/2014.

The pecuniary administrative sanctions provided for by this article shall be increased up to three times or, where larger, ten times the profit generated or the losses avoided due to the unlawful action when, having taken account of the criteria listed in article 194-bis and the size of the product or the profit from the unlawful action, they appear to be inadequate even if the maximum is applied.

For the cases referred to in this article, attempted violations shall be treated as completed violations.

Market manipulation (article 185 and article 187-ter)

Criminal sanctions

Imprisonment for between one and six years and a fine of between twenty thousand euro and five million euro shall be imposed on any person who disseminates false information or sets up sham transactions or employs other devices concretely likely to cause a significant alteration in the price of financial instruments.

There shall be no punishment for anyone who has committed the offence by means of sales or purchase orders or transactions carried out for lawful reasons and in compliance with the admitted market practices, pursuant to article 13 of Regulation (EU) no. 596/2014.

Courts may increase the fine up to three times or up to the larger amount of ten times the product of the crime or the profit therefrom when, in view of the particular seriousness of the offence, the personal situation of the guilty party or the magnitude of the product of the crime or the profit therefrom, the fine appears inadequate even if the maximum is applied.

Administrative sanctions

Without prejudice to the judicial sanctions applicable when the action constitutes a criminal offence, a pecuniary administrative sanction of between twenty thousand euro and five million euro shall be imposed on anyone who infringes the law against market manipulation referred to in article 15 of Regulation (EU) regulation 596/2014.

Administrative sanctions may not be imposed on persons who demonstrate that they acted for legitimate reasons and in accordance with accepted market practices for the market concerned.

Accessory penalties (article 186 of the TUF)

Conviction for insider dealing or market manipulation offences entails the application of the accessory penalties referred to in Articles 28 (interdiction from public offices), 30 (interdiction from profession or art), 32-*bis* (temporary interdiction from management offices of legal persons and enterprises), 32-*ter* (inability to contract with the public administration) of the criminal Code for a period of not less than six months and not more than two years and the publication of the judgement in at least two daily newspapers having national circulation of which one shall be a financial newspaper.

Pursuant to article 187 of the TUF, in the event of conviction for insider dealing or market manipulation offences the product of the crime or the assets that constitute its profit shall be confiscated. If it is not possible to execute the confiscation, a sum of money or property of equivalent value may be confiscated. For anything not established by the preceding paragraphs, the provisions of Article 240 of the Criminal Code shall apply.

According to art. 187-quarter of the TUF, application of pecuniary administrative sanctions provided for insider dealing and market manipulation offences shall imply i) temporary interdiction from carrying out administration, management and control functions in entities authorised pursuant to the TUB, ii) temporary interdiction from carrying out administration, management and control functions in listed companies and in companies belonging to the same group of listed companies, iii) suspension from the register, pursuant to Article 26, paragraphs 1(d) and 1-bis of Legislative Decree No. 39 of 27 January 2010, of the statutory auditor, the statutory audit firm or the person in charge of the engagement; iv) suspension from the Register pursuant to Article 31, paragraph 4 for financial advisors authorised to offer their services outside the seat of a company; iv) suspension from the Register pursuant to Article 31, paragraph 4 for financial advisors authorised to offer their services outside the seat of a company. 39 of 27 January 2010, of the statutory auditor, the statutory auditing firm or the person in charge of the engagement; iv) the suspension from the Register, pursuant to Article 31, paragraph 4, for financial advisors authorised to offer products outside their offices; v) the temporary non-fulfilment – for a period not shorter than 2 months and not longer than 3 years - of the integrity requirements for corporate officers and shareholders of authorised intermediaries, stock exchange companies, auditors and financial advisors authorised to make door-to-door offers and, for corporate officers of listed companies, temporary disqualification from taking up administrative, management or supervisory positions in listed companies or companies belonging to the same group as listed companies.

In the measure imposing pecuniary administrative sanctions, CONSOB, taking into account the seriousness of the violation and the degree of fault, may order authorised intermediaries, market operators, listed issuers and auditing firms not to use the offender in the exercise of their activities

for a period of not more than three years and ask the competent professional associations to suspend the registrant from practice of the profession.

Furthermore, the application of the pecuniary administrative sanctions shall entail the confiscation of the product or profits of the offence. If it is not possible to execute the confiscation pursuant to paragraph 1, a sum of money or property of equivalent value may be confiscated (article 187-sexies of the TUF).

Article 187-quinquies finally provides for a type of entity liability. Pursuant to said article, entities shall be punished with a pecuniary administrative sanction of between twenty thousand euro and fifteen million euro, or up to fifteen percent of turnover when this amount is more than fifteen million euro and the turnover can be determined pursuant to article 195, paragraph 1-bis, where an infringement of the prohibition under article 14 or of the prohibition under article 15 of Regulation (EU) no. 596/2014 is committed in their interest or to their advantage:

a) by persons performing representative, administrative or management functions in the entity or one of its organizational units having financial and functional autonomy and by persons who, de facto or otherwise, manage and control the entity;

b) persons subject to the direction or supervision of a person referred to in paragraph a).

If, following the perpetration of offences referred to in paragraph 1, the product thereof or the profit therefrom accruing to the entity is very large, the sanction shall be increased up to ten times such product or profit.

However, entities shall not be liable if they demonstrate that the persons specified above acted exclusively in their own interest or in the interest of third parties.

Information Notice pursuant to art. 13 of Regulation (EU) 2016/679

Pursuant to article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("*General Data Protection Regulation*", hereafter "GDPR" or "Regulation"), we inform You that Your personal data – collected by third parties - (collectively hereafter "Data"), shall be subject, in compliance with the above mentioned legislation and in accordance with the confidentiality obligations inspiring the Bank's activity, to the processing referred to in art. 4 of the Regulation.

In particular we wish to inform You of the below.

1. Data relating to the data controller and data protection officer

The Controller of the processing pursuant to the Law is BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milan.

The Representative of the Controller with functional delegation to represent the Bank, for the purpose of performing what provided for under Regulation (EU) 2016/679, is the Bank's Chief Executive Officer.

The Bank also appointed a Data Protection Officer who can be contacted at the following email address: DPO@bff.com.

2. Purposes and modalities for the processing

The collection and processing of Data are made in order to allow this Bank to conduct the following activities:

- Keeping the list or persons who have access to inside information (i.e. adoption and keeping of a List of persons who, by virtue of their employment or profession or due to the duties discharged, have access to the information referred to in article 114, paragraph 7 of the TUF (inside information).

Data will be processed by personnel authorized to the processing pursuant to article 29 of Regulation EU 2016/679. The processing of Data for said purposes will take place with automated as well as manual modalities, based on logic criteria compatible and functional to the purposes for which data have been collected, in compliance with the confidentiality and security rules provided for by the law and the company's internal regulations.

3. Categories of personal data

In order to pursue the purposes referred to in the above item the Bank processes the following categories of personal data concerning it:

- Name, address or other personal identification elements;

4. Categories of recipients of personal data

Data collected may be communicated to Computershare S.p.A..

5. Transfer of personal data to a Third Country

Your data will not be transferred abroad.

6. Storage Period

Data will be stored for the period strictly necessary to achieve the purposes pursued as well as to comply with the obligations provided for by art. 18 of Regulation (EU) No. 596/2014 and the Commission Implementing Regulation (EU) 1210/2022. Any further storage of Data or portion of Data may be ordered to enforce or defend its rights in any possible venue and, in particular, in judicial venues.

7. Data subject rights

The current legislation entitles the Data Subject to several rights which You are invited to carefully consider. Among those, please be reminded of the rights to:

1. Access the following information:
 - a. purposes of the processing,
 - b. categories of personal data concerned,
 - c. recipients or categories of recipients to whom said personal data have been or will be communicated, in particular in case of third countries recipients or international organizations,
 - d. existence of the Data Subject's right to request from the controller the rectification or erasure of personal data or restriction of processing concerning the data concerning him/her or to object to the processing thereof;
2. Rectification, meaning by such:
 - a. rectification of inaccurate personal data concerning him or her without undue delay,
 - b. completion of incomplete personal data, including by means of providing a supplementary statement;
3. Erasure of data concerning him or her without undue delay, if:
 - a. data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - b. the data subject withdraws consent and there is no other legal ground for the

- processing,
 - c. You object to the processing and there are no overriding legitimate grounds for the processing,
 - d. personal data have been unlawfully processed,
 - e. personal data have to be erased for compliance with a legal obligation,
 - f. personal data have been collected in relation to the offer of information society services;
4. Restriction of processing:
- a. where the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b. where the processing is unlawful and the data subject objects to the erasure of the personal data and requests the restriction of their use instead,
 - c. where the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
 - d. where You object to the processing pursuant to your objection right;
5. Be notified in case of occurred rectification or erasure of personal data or restriction of processing;
6. Data portability, i.e. right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and You have the right to transmit those data to another controller, where:
- a. the processing is based on consent expressed by the data subject for one or more specific purposes or takes place by virtue of a contract entered into with the data subject; and
 - b. the processing is carried out by automated means.
7. Objection, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

You are entitled to submit a complaint to a supervisory Authority where You deem the mentioned rights not to have been granted to You. You can contact the data Controller to exercise the above rights by writing to BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milan. As an alternative, you can contact the Data Protection Officer by writing to the following email address: DPO@bff.com.

Annexes:

A - Procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information.

B - Internal procedure for the management and external disclosure of Inside Information.

Sincerely Yours.

The Person in Charge of keeping and updating the Insider List

For acknowledgement and acceptance

Place and Date

ANNEX 2-bis – Disclosure relating to the inclusion in the RIL

Milan, [•]

Reference: Inclusion in the RIL

Dear [•],

in compliance with the approaches expressed by Consob in the “*Guidelines in the matter of Management of Inside Information*” No. 1 of 13 October 2017 and with the Procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information (the “**Lists Procedure**”), BFF Bank S.p.A. (the “**Bank**”) established the “*Relevant Information List*” (“**RIL**”), i.e. the list of persons having access to so called Relevant Information.

Please note that, “Relevant Information” pursuant to the Lists Procedure, shall mean single information that may, at a later, even soon, moment, assume the nature of Inside Information pursuant to article 7 of Regulation (EU) No. 596/2014 and accordingly be subject to dissemination, as soon as possible, to the public (unless the conditions are met to delay the publication thereof).

In light of the above, in my capacity as Person in Charge of keeping and updating the RIL, I inform You that on [•] You have been included in the RIL, for the following reason: [*specify reason*].

I remind You that those who have access to Relevant Information shall comply with (i) the “*Procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information*” (Annex A), and (ii) the prescriptions laid down in the “*Internal procedure for the management and external disclosure of Inside Information*” adopted by the Company (Annex B).

In this respect, please note that it is the duty of each individual included in the RIL to ensure the confidentiality of the Relevant Information in his/her hands, within his/her sphere of activity and responsibility, starting from the time at which, with whatever means (i.e. by correspondence, on occasion of meetings and/or otherwise), he/she has come into possession thereof.

Should the included individual disclose, also unintentionally, Relevant Information to persons not possessing it (also where they are already included in the RIL for other reasons) for other reasons) he/she must immediately inform the Chief Executive Officer with a copy to the Person in Charge of keeping and updating the RIL.

Without prejudice to the possibility for the Bank to seek compensation for every damage and/or liability that may derive thereto from behaviours in breach of the obligations referred to in this Disclosure, the non-fulfilment thereof triggers:

- i. for subordinated employees, the imposition of disciplinary sanctions provided for by the legal provisions in force and the applicable collective labour agreements,
- ii. for any other collaborator, the termination – also without advance notice – of the relationship;
- iii. for directors and statutory auditors of the Company, the Board of Directors may propose at the following Shareholders' Meeting the dismissal for just cause of the defaulting board member or statutory auditor.

We invite You to keep the Bank constantly updated on possible variations relating to the information specified in this document, promptly reporting possible changes to BFF Bank Spa.

to the following e-mail address: (Registroinsider@bff.com) or via fax to the number [•].

Personal details necessary for inclusion in the RIL and the relating updates will be processed in accordance with the provisions laid down by Regulation (EU) 2016/679 of the European Parliament

and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("*General Data Protection Regulation*").

Please finally be reminded that, should the Relevant Information You have access to subsequently be deemed to be an Inside Information, You might receive an additional written disclosure in accordance with the provisions of the Lists Procedure; in this case, Your data will remain included in the RIL until the section dedicated to the mentioned Relevant Information is closed.

For any information or clarification relating to this disclosure and its application please refer to the Person in Charge of keeping and updating the RIL.

Disclosure

pursuant to art. 13 of Regulation (EU) 2016/679

Pursuant to article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("*General Data Protection Regulation*", hereafter "GDPR" or "Regulation"), we inform You that Your personal data – collected by third parties - (collectively hereafter "Data"), shall be subject, in compliance with the above mentioned legislation and in accordance with the confidentiality obligations inspiring the Bank's activity, to the processing referred to in art. 4 of the Regulation.

In particular we wish to inform You of the below.

1. Data relating to the data controller and data protection officer

The Controller of the processing pursuant to the Law is BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milan.

The Representative of the Controller with functional delegation to represent the Bank, for the purpose of performing what provided for under Regulation (EU) 2016/679, is the Bank's Chief Executive Officer.

The Bank also appointed a Data Protection Officer who can be contacted at the following email address: DPO@bff.com.

2. Purposes and modalities for the processing

The collection and processing of Data are made in order to allow this Bank to conduct the following activities:

- Keeping the list or persons who have access to inside information (i.e. adoption and keeping of a List of persons who, by virtue of their employment or profession or due to the duties discharged, have access to the information referred to in article 114, paragraph 7 of the TUF (inside information).

Pursuant to art. 6 of the Regulation, the legal basis for the pursuit of the above purposes is necessary to comply with a legal obligation the Data Controller is subject to.

Data will be processed by personnel authorized to the processing pursuant to article 29 of Regulation EU 2016/679.

The processing of Data for said purposes will take place with automated as well as manual modalities, based on logic criteria compatible and functional to the purposes for which data have been collected, in compliance with the confidentiality and security rules provided for by the law and the company's internal regulations.

3. Categorie di personal data

In order to pursue the purposes referred to in the above item the Bank processes the following categories of personal data concerning it:

- Name, address or other personal identification elements.

4. Categories of recipients of personal data

Data collected may be communicated to: *Computershare S.p.A.*.

5. Transfer of personal data to a Third Country

Your data will not be transferred abroad.

6. Storage Period

Data will be stored for the period strictly necessary to achieve the purposes pursued as well as to comply with the obligations provided for by art. 18 of Regulation (EU) No. 596/2014 and the Commission Implementing Regulation (EU) 1210/2022³⁴⁷. Any further storage of Data or portion of Data may be ordered to enforce or defend its rights in any possible venue and, in particular, in judicial venues.

7. Data subject rights

The current legislation entitles the Data Subject to several rights which You are invited to carefully consider. Among those, please be reminded of the rights to:

1. Access the following information:
 - a. purposes of the processing,
 - b. categories of personal data concerned,
 - c. recipients or categories of recipients to whom said personal data have been or will

- be communicated, in particular in case of third countries recipients or international organizations,
- d. existence of the Data Subject's right to request from the controller the rectification or erasure of personal data or restriction of processing concerning the data concerning him/her or to object to the processing thereof;
2. Rectification, meaning by such:
- a. rectification of inaccurate personal data concerning him or her without undue delay,
 - b. completion of incomplete personal data, including by means of providing a supplementary statement;
3. Erasure of data concerning him or her without undue delay, if:
- a. data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - b. the data subject withdraws consent and there is no other legal ground for the processing,
 - c. You object to the processing and there are no overriding legitimate grounds for the processing,
 - d. personal data have been unlawfully processed,
 - e. personal data have to be erased for compliance with a legal obligation,
 - f. personal data have been collected in relation to the offer of information society services;
4. Restriction of processing:
- a. where the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b. where the processing is unlawful and the data subject objects to the erasure of the personal data and requests the restriction of their use instead,
 - c. where the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise

- or defence of legal claims,
- d. where You object to the processing pursuant to your objection right;
5. Be notified in case of occurred rectification or erasure of personal data or restriction of processing;
6. Data portability, i.e. right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format and You have the right to transmit those data to another controller, where:
- a. the processing is based on consent expressed by the data subject for one or more specific purposes or takes place by virtue of a contract entered into with the data subject; and
 - b. the processing is carried out by automated means.
7. Objection, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

You are entitled to submit a complaint to a supervisory Authority where You deem the mentioned rights not to have been granted to You. You can contact the data Controller to exercise the above rights by writing to BFF Bank S.p.A., via Domenichino, n. 5, 20149, Milan. As an alternative, you can contact the Data Protection Officer by writing to the following email address: DPO@bff.com.

Annexes:

A- Procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information.

B- Internal procedure for the management and external disclosure of Inside Information.

Sincerely Yours.

The Person in Charge of keeping and updating the Insider List

ANNEX 3 – Disclosure relating to the update of data included in the Insider List

Dear [SURNAME, FIRST NAME],

in accordance with the provisions set out in article 18 of the Regulation (EU) no. 1210/2022 as well as in BFF Bank S.p.A.'s (the "**Bank**") procedure for keeping and updating the Lists of persons having access to Relevant Information and Inside Information, in my capacity as Person in Charge of keeping and updating the Insider List, I inform You that on dd/mm/yyyy Your personal data subject to processing in the Insider List have been updated for the following reason: *[specify reason]*.

Sincerely Yours,

The Person in Charge of keeping and updating the Insider List

ANNEX 4 - Disclosure relating to the erasure from the Insider List

Dear [SURNAME FIRST NAME],

in accordance with the provisions set out in article 18 of the Regulation (EU) no. 1210/2022 as well as in BFF Bank S.p.A.'s (the "**Bank**") procedure for keeping and updating the List of persons having access to Relevant Information and Inside Information, in my capacity as Person in Charge of keeping and updating the Insider List, I inform You that on dd/mm/yyyy the reason for Your inclusion in the Insider List, communicated to You with letter of dd/mm/yyyy, has ceased.

Accordingly, Your personal data subject to processing (surname, first name, address of residence, tax code, reference company, reason for the inclusion in the Insider List) will be erased after five years from dd/mm/yyyy.

Sincerely Yours.

The Person in Charge of keeping and updating the Insider List

ANNEX 5 – Inclusion / update / erasure request

Applicant
Function/Direction/Company: _____
First Name: Surname: _____
Office held: _____

Inclusion Request

Variation Request

Cancellation Request

Identification details of the Individual to be included / to whom the variations / cancellation request refer/s	
Natural Person	Legal Person
First Name and Surname _____	Corporate Name _____
Place and date of birth _____	Registered office _____
_____	Tax Code _____
Tax Code _____	<i>First name and Surname of the reference Person:</i> _____
_____	_____
City of Residence – ZIP CODE – Prov: _____	Office held: _____
Address of residence: _____	Address of residence: _____
_____	ZIP CODE – City –
_____	Prov: _____

Nationality of Residence: _____	Nationality of Residence: _____
Work direct telephone line and work mobile number: _____ _____	Work direct telephone line and work mobile number: _____ _____
Home and personal mobile telephone numbers: _____	Home and personal mobile telephone numbers: _____
e-mail: _____	e-mail _____
<input type="checkbox"/> Occasional access	<input type="checkbox"/> Permanent access
Activity discharged: _____ _____	Office held: _____ _____
In case of occasional access, Specify the Inside Information:	
Project Code: _____ Specific	
Description of the Inside Information:	
Date and time at which the individual has come into possession of the Inside Information triggering the inclusion: _____ _____; _____ (dd/mm/yyyy hh:mm)	
Signature: _____	

ANNEX 6 - Disclosure relating to the erasure from the RIL

Milan, DATE OF DOCUMENT

Reference: Erasure from the List of persons having access to “Relevant” Information suitable to become inside information

Dear [SURNAME FIRST NAME]

In my capacity as Person in Charge of keeping and updating the List of persons having access to “Relevant” Information suitable to become inside information (the “List”) of BFF Bank S.p.A., I inform You that, with reference to Your inclusion in the List as regards the specific Relevant Information PROJECT CODE, on CURRENT REGISTRATION DATE, You have been erased from the List, the reason for Your inclusion having ceased.

Please remind that erasure from the List does not entail, per se, (i) any limitation of any possible civil, criminal or administrative liability associated with the Bank’s confidential information and/or the use thereof, or (ii) the ceasing of the confidential nature of said information, or (iii) amendments in the nature or content of the information for which You have been included in the List.

Your personal data subject to processing (surname, first name, tax code, reference company, reason for the inclusion in the List) will be erased after at least five years from the above date.

Sincerely Yours,

The Person in Charge of keeping and updating the List