



Internal regulations for keeping the register of persons with access to inside information and the register of persons with access to relevant information



**Internal regulations for keeping the register
of persons with access to inside information
and the register of persons having access to relevant information**

Approved by the Board of Directors on July 12 2018

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INTRODUCTION

In application of and pursuant to:

- Article 18 of Regulation 596/2014/EU of the European Parliament and of the Council on market abuse (the “**MAR**”), which prescribes the establishment of a register of all those with which a professional collaboration exists, whether a contract of employment or other form, and who, in going about certain tasks, have access to inside information (the “**Insider Register**” or the “**Register**”);
- Implementing Regulation No. 347/2016/EU of the Commission, which establishes technical implementation rules for the precise format of the insider lists and the relative updates;
- Legislative Decree no. 58 of 24 February 1998 as subsequently amended (the “**TUF**”);
- the provisions pursuant to Article 1 of the Code of Conduct for listed companies to which the company adheres, that, for the purpose of ensuring the correct internal management and external disclosure, recommends the adoption of a procedure for the internal management and external disclosure of documents and information concerning the issuer, with particular reference to inside information;
- Section 3 of the guidelines on the “Management of Inside information” adopted by CONSOB on 13 October 2017 (the “**Guidelines**”) [(¹)], which suggests the institution of a register of all those with whom there is a professional collaboration in place, whether a contract of employment or other, and who, in going about certain tasks, has access to relevant information (the “**Register of Relevant Information**” or, according to the definition given in the Guidelines, the “**Relevant Information List**” or the “**RIL**” and, jointly together with the Register, the “**Registers**”);

the Board of Directors of Unieuro S.p.A., in the meeting held on 12 July 2018, approved a new edition of the “Internal Regulation on the keeping and updating the register of persons having access to inside information and the register of persons having access to relevant

(¹) The Guidelines - issued in lieu of Consob communication dated 28 March 2006, no. 602705443 - “constitute support in defining the process and resulting implementation procedures for applying the legal and regulatory provisions on market abuse, specifically: - the obligations set out in the MAR and the related implementing provisions [...]. These Guidelines also seek to offer [...] some detailed operative indications useful to ensuring the best implementation of European regulations regarding the specificity of the institutional and national operative framework. Some indications constitute re-workings of clarifications supplied by Consob as part of pre-existing regulations, duly readjusted to the new regulatory context.” (See point 1.3 of the Guidelines). The Guidelines are not prescriptive and, if ignored, do not, in themselves, constitute a violation of the regulations; they “do not introduce burdens, even organisational burdens, for issuers in addition to those set out in EU regulations, considering that these merely indicate suitable methods to be used for such regulations, while it remains the issuers’ responsibility to decide whether to (fully or partially) comply therewith.” (See point 1.3.3 of the Guidelines).

information” (hereinafter the “**Regulation**” or the “**Procedure**”), approved during the meeting held on 12 December 2016.

For all aspects not specifically envisaged by this Regulation, referral is expressly made to the provisions of the MAR and the national and European provisions applicable *pro tempore*.



DEFINITIONS

Chief Executive Officer	The Chief Executive Officer appointed at the Company.
Board of Directors	The Company's Board of Directors from time to time in office.
Employees	Company employees not including the Relevant Individuals.
Group	The Company and its Subsidiary Companies.
Inside Information	<p>Information of a specific nature that is not made public and that directly or indirectly concerns the company or its financial instruments that, if made public, could significantly influence the prices of the company's financial instruments.</p> <p>In particular, information with a "specific nature" must be understood as information that:</p> <ul style="list-style-type: none">a) refers to a set of circumstances that exist or might reasonably be expected to exist, or to an event that has occurred or that might reasonably be expected to occur; andb) is sufficiently specific to allow conclusions to be drawn about the possible effect of the set of circumstances or event referred to in point (a) on the prices of the Financial Instruments or the relative derivative financial instruments. In this regard, in the case of a lengthy process aimed at realising a particular circumstance or a particular event, or in the case of a lengthy process that determines them, this future circumstance or future event, and the intermediate steps of the same process that are related to the realisation or determination of the future circumstance or event, can be regarded as information of a precise nature. <p>In addition, "information which, if made public, could have a significant influence on the prices of the Financial Instruments" means information that a reasonable investor would presumably use as a basis for investment decisions.</p>

Relevant Information	All information or news that cannot yet be classified as Inside Information, which the Company believes to be relevant, insofar as relative to data, events, projects or circumstances that, continuously, repeatedly, periodically or occasionally on a random or unforeseen basis, regard the Company directly and that can, at a later date, even in the near future, become “inside information” ⁽²⁾ .
Persons	The subjects registered in the Individual Sections and the Permanent Section of the Register and the Occasional RIL Sections and the Permanent RIL Section.
Issuers' Regulation	Regulation implementing Legislative Decree no. 58 of 24 February 1998 regarding the issuers regulations adopted by Consob with resolution no. 11971 of 14 May 1999 as subsequently amended.
MAR	Regulation (EU) No. 596/2014 of the European Parliament and the Council on market abuse.
Company	Unieuro S.p.A., a company under Italian law, recorded on the commercial register of Forlì-Cesena, no. REA 177115, tax no. and VAT no. 00876320409 with headquarters in Forlì, via Schiapparelli, no. 31.
Subsidiary/ies	Companies controlled by the Company pursuant to Article 93 of the TUF.
Person Responsible	Subject with operative responsibility for the keeping and update of the Registers.
TUF	Legislative Decree no. 58 of 24 February 1998 as subsequently amended (<i>Testo unico delle disposizioni in materia di intermediazione finanziaria - Consolidated Finance Act</i>).

⁽²⁾ Paragraph 3.1.2 of the Guidelines provides an example list of the types of inside information that may involve an issuer: “[...] *Information relating to: ownership structures; management team; management incentive plans; auditors’ activities; operations on capital; issue of financial instruments; characteristics of the financial instruments issued; acquisitions, mergers, spin-offs, etc.; restructuring and reorganisation operations; operations on financial instruments, buy-backs and accelerated book-building; collective procedures; legal dispute; revocation of bank overdrafts; write-downs/write-backs of assets or financial instruments in the portfolio; patents, licences, rights, etc.; insolvency of major debtors, destruction or damage of goods not insured; purchase or sales of assets; trend of operations; changes in forecast period accounting results (profit warnings and earnings surprises); receipt or cancellation of major orders; entrance into new (or exiting from) markets; changes to investment plans; dividends distribution policies; for banks, information that the issuer obtained from the supervisory authorities under the scope of a Supervisory Review and Evaluation Process (SREP) performed in accordance with Article 97 of Directive 2013/36/EU (CRD IV).*”

RULES AND PROCEDURES FOR KEEPING AND UPDATING THE REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION AND THE REGISTER OF PERSONS WITH ACCESS TO RELEVANT INFORMATION

1. Introduction

This Regulation defines the rules and procedures for keeping and updating the register of persons with access to Inside Information (the “**Insider Register**” or, more simply, the “**Register**”) and the register of persons with access to Relevant Information (the “**Register of Relevant Information**” or, according to the definition of the Guidelines, the “**Relevant Information List**” or “**RIL**”) regarding the Company and any of its Subsidiaries.

The Registers are set up, managed and maintained by the Company, including on behalf of any Subsidiaries, in respect of which the internal policies on the circulation and monitoring of Relevant Information and Inside Information enable the Company to fulfil the obligations related to the proper keeping of the Registers.

2. Form and content of the Registers

2.1 The Registers are set up in electronic form on computer and consist of a system that can be accessed via the internet/intranet by entering a username and password, protected by appropriate security systems and access filters.

2.2 The Insider Register consists of: (i) several different sections, one for each item of Inside Information, setting out the data of the subjects with access to that specific Inside Information; a new section must be added each time new Inside Information is identified, even if subject to delay (“**Individual Section**” and jointly the “**Individual Sections**”); (ii) a supplementary section giving the data of persons who always have access to all Inside Information (the “**Permanent Section**”), who, once included in this section, shall not be further repeated in the Individual Sections.

2.3 The RIL consists of: (i) different sections, one for each item of Relevant Information, setting out the data of the subjects with access to that specific Information; a new section must be added each time new Relevant Information is identified, (“**Occasional RIL Section**” and jointly the “**Occasional RIL Sections**”); (b) a supplementary section giving the data of persons who always have access to all Relevant Information, who, once included in this section, shall not be further repeated in the Occasional RIL Sections (the “**Permanent RIL Section**”).

2.4 In addition or as an alternative to the provisions of the previous paragraph 2.3, at the discretion of the Supervisor, the RIL can be divided up into separate sections, one for each “project”, thereby meaning a project relative to a specific operation (e.g. an extraordinary operation, an acquisition, etc.) or a specific event, even if recurring (for example approval of annual and interim accounting data) within which all those with access to the information considered therein, can be included (the “**Project Occasional RIL Section**”).

2.5 With reference to each person entered on the Insider Register, in compliance with the provisions of the models pursuant to Annex 1 of Regulation 347, the following information is given:

- i. the first name, surname and birth name (if different); if the person is a legal entity, institution or professional partnership, the identity of at least one reference person who can identify the persons with access to the Inside Information must be provided;
- ii. the date of birth of the registered person;
- iii. the tax code of the registered person (i.e. the registration number with Companies House);
- iv. the complete home address (house number, street, city and district, postcode, country) of the registered person (or registered office).
- v. the home, work, landline and mobile telephone numbers;
- vi. the role and reason for accessing the specific Inside Information;
- vii. the date and time at which the registered person gained access to the Inside Information or the date and time at which the registered person was identified as a subject having permanent access to all Inside Information;
- viii. the date and time at which (a) the registered person ceased to have access to the specific Inside Information; (b) the information relating to the person was updated, if applicable; (c) the change necessitating the update took place;

The Insider Register also specifies the date on which each Individual Section and the Permanent Section were prepared, updated and potentially sent to the competent authority.

2.6 The following information is given with reference to each person entered on the RIL:

- i. name and surname or, in the case of a legal entity, entity or association of professionals, the name and surname of at least one reference natural person able to identify the persons with access to Relevant Information;
- ii. the fixed professional telephone number;
- iii. the description of the role, duties and reason why the person is registered;
- iv. the date and time at which the person had access to the Relevant Information or the date and time at which the person was identified as a subject having permanent access to all Relevant Information, the date and time of each update of the information relating to the person, as well as the date and time at which the change was made, making the update necessary.

The RIL also specifies the date on which each Occasional RIL Section and the Permanent RIL Section were prepared, updated and potentially sent to the competent authority.

3. Procedure for keeping and updating the Register

3.1 The Board of Directors has resolved that responsibility for keeping the Registers lies with the Investor Relater (the “**Supervisor**”) in the person of the relative *pro-tempore* manager. The Investor Relater or person appointed by him in writing with the authorisation of the Chief Executive Officer, identify the subject appointed to keep the Registers (the “**Appointed Person**”).

3.2 The Appointed Person enters the Persons and updates the Individual Sections and the Occasional RIL Sections, with the assistance of the company departments involved each time. Without delay, the latter inform, by e-mail or other written means guaranteeing receipt, the Appointed Person of the information necessary to enter the Persons into each of the Individual Sections and the Occasional RIL Sections and to update the related data. Specifically:

- (a) information regarding employees of the Company or Subsidiaries and the related updates are notified by the HR Department;
- (b) information regarding consultants of the Company or Subsidiaries and the related updates are notified by the: (i) members of the administration and control bodies and committees of the Company and Subsidiaries; (ii) managers reporting directly (hierarchically and/or functionally) to the Chairman of the Board of Directors of the Company or Chief Executive Officer of the Company; and (iii) managers reporting directly (hierarchically or functionally) to managers indicated under (ii); and
- (c) the information necessary to update the Registers relative to the independent auditing firm is disclosed by the manager appointed to prepare the company's accounting documents.

3.3 The Board of Directors (or the subject/s delegated by it) proceeds periodically to identify and update the Persons with permanent access to Relevant Information and Inside Information, to be entered into the Permanent Section or Permanent RIL Section, as applicable, and promptly informs the Appointed Person, so that he may proceed with the related entry or update.

3.4 Through their executive directors or other subjects appointed to this end, the Subsidiaries shall, without delay, inform, by e-mail or other written means guaranteeing receipt, the Chief Executive Officer of the Company (or in his absence or impediment, the Chairman of the Company’s Board of Directors) and the Appointed Person, of all Relevant Information or Inside Information relating to events or circumstances occurring in their area of activity. The Subsidiaries identify a point of reference, for the correct application of the provisions of this Procedure, with specific reference to the requirements relating to the

Registers and information flows towards the Company and provide the data of the Reference Person.

3.5 Any of the Persons entered in the Individual Sections or Occasional RIL Sections or in the Permanent Section or the Permanent RIL Section, who discloses or becomes aware of the communication of Relevant Information or Inside Information, as applicable, to another subject who is not already required, in accordance with internal provisions, to have access to Relevant Information or Inside Information, shall notify, without delay, by e-mail or other written means guaranteeing receipt, the Appointed Person, of the name of said subject for the purpose of his inclusion in the Register or RIL, as applicable, or the update of the related data.

3.6 The Registers are kept in such a way as to ensure:

- a) that the information contained therein is confidential, ensuring that access is limited to clearly identified persons who are required to access it due to the nature of the respective roles or positions that they fulfil or occupy;
- b) that the information contained therein is accurate; and
- c) that previous versions of the Registers can be accessed and retrieved.

3.7 The Appointed Person shall update the Registers promptly when a change in its content is reported. Each update shall specify the date and time at which the change triggering the update occurred. Specifically, the Registers shall be updated, including the date of the update, in the following circumstances:

- a) if a change occurs regarding the reason for the inclusion of a Person, including the movement of the Person from an Individual Section or Occasional RIL Section, as applicable, to another Individual Section or Occasional RIL Section or to the Permanent Section or Permanent RIL Section and vice versa;
- b) where there is a new person who has access to Relevant Information or Inside Information and needs, therefore, to be added to the RIL or Register;
- c) where a Person ceases to have access to Relevant Information or Inside Information, specifying the date from which access no longer took place.

The Persons shall be removed as soon as: (a) the Relevant Information has ceased to exist; (b) the Inside Information is communicated to the market; or (c) if the basis for registration no longer exists for any other reason.

3.8 The determinations pursuant to paragraph 3.7 above, are made: (i) by the Appointed Person with reference to each Individual Section and each Occasional RIL Section, in compliance with the provisions pursuant to paragraphs 3.2, 3.4 and 3.5 above; (ii) by the Board of Directors (or subject/s appointed by it) with reference to the Permanent Section and the Permanent RIL Section in compliance with the provisions pursuant to paragraph 3.3 above.

3.9 Any amendment to or removal of the data in the Registers shall be done in such a way as to ensure that the data amended or removed remain legible.

3.10 The data will be conserved for at least 5 (five) years after the end of the circumstance that resulted in the entry or update of the Registers ⁽³⁾.

4. Disclosure obligations to Persons

4.1 Without delay, by e-mail or other written means guaranteeing receipt, the Appointed Person shall send the person concerned written notice of his entry in the Insider Register, informing him of the legal obligations and applicable sanctions, to this end using the model attached to this Procedure as Annex 2. The Appointed Person shall inform the Persons already entered on the Register of any updates regarding them, by means of communication compliant with the model pursuant to Annex 3, sent by e-mail or other written means guaranteeing receipt, and of any removal of their names from the Register, with communication compliant with the model pursuant to Annex 4, again sent by e-mail or other written means guaranteeing receipt.

4.2 Communication to Persons with respect to registration in the Insider Register must envisage the obligation:

- to return, signed for receipt and acceptance, copies of the documents delivered to them in accordance with the foregoing, thus accepting the contents; and
- to comply with the provisions contained therein.

4.3 Immediately after the registration of a Person in the RIL, the Appointed Person shall inform him, using the means considered most appropriate, of his inclusion in the RIL and send him a copy of this Procedure and the “Internal rules on the management of Relevant Information and Inside Information” adopted by the Company, to which this Procedure is related.

4.4 The Appointed Person shall maintain, on a permanent medium, copies of the communications sent to the Persons in order to ensure that fulfilment of the disclosure obligations can be proven and traced pursuant to this Article 4.

4.5 The Appointed Person shall send, to persons requesting this, a copy of the details relating to them contained in the Register.

5. Notification of Consob

⁽³⁾ With reference to the Register, please see Article 18 of the MAR.

The Investor Relater shall send to Consob, without delay, the Registers or parts of them if expressly requested to do so by the Supervisory Authority.

6 Handling of personal data

For the purposes of this Procedure, the Company will be obliged to handle certain personal data of Persons. Persons were, therefore, made aware of the following:

- i. the purposes and processing procedures for which the data is intended;
- ii. the mandatory nature of the data transferral;
- iii. the parties, or categories of parties, to which the data may be communicated and the scope of dissemination of such data;
- iv. their rights pursuant to Articles 15 *et seq.* of EU Regulation 2016/679;
- v. the first name, surname, company name and domicile, residence and registered office of the owner and the manager:
 - Controller: Unieuro S.p.A.
 - Supervisor: Investor Relater, in the person of Italo Valenti.

7 Sanctions

7.1 Without prejudice to the Company's right to lodge a counterclaim for all damages and/or liability it may incur from any conduct by Persons in violation of this Procedure, failure to observe the obligations and prohibitions laid down by this Procedure shall entail, for all persons entered on the RIL, the liability envisaged by the provisions of law and regulations in force *pro tempore* and, for persons entered on the Insider Register, also those envisaged by legislation governing the Insider Register, as described in Annex 1.

7.2 Failure to observe the obligations and prohibitions set out by this Procedure will also entail the application of disciplinary sanctions in accordance with the provisions of collective bargaining agreements and the obligation to compensate the Company or Subsidiaries for all damages they may incur from violation of this Procedure, to be intended as an integral part of the contract of employment and/or other form of agreement or trust as may be stipulated between the Persons and the Company and/or the Subsidiaries.

8 Final provisions

8.1 The Supervisor and the Chief Executive Officer have the task of monitoring the



evolution of the legislation (also in light of related application practice and experience accrued) on the Insider Register and the RIL and submit to the Board of Directors the proposed changes and/or supplements to the Regulation as may be considered necessary and/or appropriate.

8.2 The Appointed Person shall send the Persons, without delay and using the means considered most appropriate, the updated version of the Regulation in the manner and ways indicated under Article 4 above.

APPENDIX 1

Regulations on the Insider Register

REGULATION (EU) No. 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 16 April 2014

on market abuse (market abuse regulation) 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

Article 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 at which 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.

ESMA shall submit those draft implementing technical standards to the Commission by 3 July 2016.

Power is conferred on the Commission to adopt the implementing technical standards referred to in the first subparagraph in accordance with Article 15 of Regulation (EU) No 1095/2010.

COMMISSION IMPLEMENTING REGULATION (EU) 2016/347 of 10 March 2016

laying down implementing technical standards with regard to the precise format of insider lists and for updating insider lists in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council

Article 1

(Definitions)

For the purposes of this Regulation, the following definition shall apply: “electronic means” are means of electronic equipment for the processing (including digital compression), storage and transmission of data, employing wires, radio, optical technologies, or any other electromagnetic means.

Article 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. 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.
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.

APPENDIX 2

Entry in the Register

In accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of 16 April 2014 relating to market abuse, and in Implementing Regulation (EU) 2016/347 of 10 March 2016, which lays down implementing technical standards for precise format of insider lists and for updating insider lists, as well as in the procedure of Unieuro S.p.A. (the “**Company**”) for the keeping and updating of the register of persons with access to inside information and the register of persons with access to relevant information (the “**Procedure**”), I hereby inform you, in my capacity as manager of the Company’s Insider Register (as defined in the Procedure), that I have entered you in the Insider Register for the following reason: [*specify reason*]

I would like to remind you that persons with access to Inside Information (as defined in the Procedure) must comply with the Insider Register Regulation described in Appendix 1 (the “**Insider Register Regulation**”), the Procedure and the requirements contained in the Procedure for the internal management and external communication of documents and information regarding Unieuro S.p.A., attached hereto and available on the website www.unieuro.com.

Sanctions

Pursuant to Articles 184 to 187-sexies of Italian Legislative Decree no. 58 of 24 February 1998, as subsequently amended and supplemented (the “**TUF**”), the application of criminal and administration sanctions is envisaged in the event of abuse of inside information and market manipulation. Additionally, please note that in the event of any hindrance to the exercise of the supervisory duties assigned to Consob and the Bank of Italy, Article 170-*bis* of the TUF envisages the application of the criminal sanctions such as imprisonment of up to two years and a fine from Euro 10,000 to Euro 200,000.

Privacy Notice as per legislation from time to time in force.

APPENDIX 3

Updating of Insider Register details

In accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of 16 April 2014 relating to market abuse, and in Implementing Regulation (EU) 2016/347 of 10 March 2016, which lays down implementing technical standards for precise format of insider lists and for updating insider lists, as well as in the procedure of Unieuro S.p.A. (the “**Company**”) for the keeping and updating of the register of persons with access to inside information and the register of persons with access to relevant information (the “**Regulation**”), I hereby inform you, in my capacity as the person responsible for keeping and updating the Insider Register (as defined in the Regulation) of the Company, that on [*date*], your personal data subject to

processing were updated, specifically [indicate which details, e.g. first name, surname, tax code, company, reason for entry in the Register] for the following reason: [state reason].

The Register Supervisor

APPENDIX 4

Removal from the Register

In accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of 16 April 2014 relating to market abuse, and in Implementing Regulation (EU) 2016/347 of 10 March 2016, which lays down implementing technical standards for the precise format of insider lists and for updating insider lists, as well as in the procedure of Unieuro S.p.A. (the “**Company**”) for the keeping and updating of the register of persons with access to inside information and the register of persons with access to relevant information (the “**Regulation**”), I hereby inform you, in my capacity as the Company's Insider Register (as defined in the Regulation) Supervisor, that as of [*date*], the reason for your inclusion in the Register for the following reasons [*specify reasons*] no longer exists.

The Register Supervisor
