



RENO DE MEDICI S.P.A.

PROCEDURE GOVERNING RELATED PARTY TRANSACTIONS

Approved by the Board of Directors on June 7th, 2021

PROCEDURE GOVERNING RELATED PARTY TRANSACTIONS

1. PREAMBLE

- 1.1** Reno De Medici S.p.A. (hereinafter, "**Reno De Medici**" or the "**Company**") has adopted this procedure (hereinafter, the "**RPT Procedure**") under Article 2391-*bis* of the Civil Code and the Regulation adopted by Consob resolution no. 17221 of 12 March 2010 and subsequent amendments (hereinafter, the "**RPT Regulation**"), as well as in accordance with the recommendations contained in the Corporate Governance Code adopted by the Corporate Governance Committee established at Borsa Italiana S.p.A. and published on 31 January 2020 (hereinafter, the "**Corporate Governance Code**").
- 1.2** The purpose of the RPT Procedure is to strengthen the protection of minority shareholders and other stakeholders by combating any abuses that may arise from transactions carried out by Related Parties involving a potential conflict of interest.
- 1.3** The RPT Procedure was approved by the Board of Directors of Reno De Medici on 7th June 2021, subject to the favourable opinion of the Related Party Transactions Committee (hereinafter, the "**RPT Committee**"), and replaces the previous versions dated 4 November 2019, 3 August 2011 and 8 November 2010. The RPT Procedure is published on the Company's *website* (www.rdmgroup.com), in the "Governance" section.

2. DEFINITIONS

The following definitions apply to the RPT Procedure:

MANAGING DIRECTOR: is the director delegated by the Board of Directors of Reno De Medici under Article 2381 of the Civil Code.

DIRECTORS INVOLVED IN THE TRANSACTION: these are the directors who have an interest in the transaction, on their own behalf or on behalf of third parties, that conflicts with that of the Company.

INDEPENDENT DIRECTORS: are the non-executive directors who meet the independence requirements set out in Article 148, paragraph 3, of the Consolidated Finance Act and Article 2 of the Corporate Governance Code to which the Company adheres.

UNRELATED DIRECTORS: are the directors other than the counterparty to a particular transaction and the related parties of the counterparty.

SHAREHOLDERS MEETING: is the Reno De Medici Shareholders Meeting.

CODE OF ETHICS: is the code of ethics adopted by Reno De Medici.

SUPERVISORY BOARD: is the Supervisory Board of Reno De Medici.

RELATED PARTY TRANSACTIONS Committee or RPT COMMITTEE: is the committee appointed by the Board of Directors of the Company and composed of 3 (three) independent directors. The RPT Committee has adopted its own internal regulations for the management of its activities.

MARKET EQUIVALENT or STANDARD Terms: terms similar to those usually applied to unrelated parties for transactions of a similar nature, amount and risk, or based on regulated rates or fixed prices or those applied to entities with which the issuer is obliged by law to contract at a specific price.

BOARD OF DIRECTORS: is the board of directors of Reno De Medici.

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CONTROL AND JOINT CONTROL: has the meaning given to it in IFRS 10, IFRS 11 (*Joint Control Agreements*) and IAS 28 (*Investments in Affiliates and Joint Ventures*) and is used with the meaning specified in those IFRSs (see IAS 24, paragraph 9).

EXECUTIVES WITH STRATEGIC RESPONSIBILITIES: Executives with Strategic Responsibilities include: (i) the members (executive and non-executive) of the Board of Directors of the Company; (ii) the full members of the Supervisory Board of the Company; (iii) the Executive Responsible for Preparing the Company's Financial Reports; and (iv) the other persons who have competence and responsibility, directly or indirectly, for the planning, management and control of the Company's activities identified and proposed annually by the Managing Director to the Board of Directors.

RECIPIENTS: are all the following parties to whom this RPT Procedure applies: (i) Executives with Strategic Responsibilities; (ii) Corporate Officers; (iii) Executives of Reno De Medici who have been granted powers to carry out transactions with an economic value equal to or greater than that of the Immaterial Transactions; (iv) members of the RPT Committee.

COMPANY REPRESENTATIVES: are all persons who act in the name and on behalf of the Company or its subsidiaries under Article 2359 of the Civil Code and are, from time to time, responsible for the performance of a transaction.

SIGNIFICANT INFLUENCE: has the meaning given to it in IFRS 10, IFRS 11 (*Joint Control Agreements*) and IAS 28 (*Investments in Affiliates and Joint Ventures*) and is used with the meaning specified in those IFRSs (see IAS 24, paragraph 9).

In particular, significant influence is the power to participate in determining the financial and operating policies of an investee company without having Control or Joint Control over it. If an entity owns, directly or indirectly (for example through subsidiaries), 20% or more of the voting rights exercisable at the General Meeting of an investee company, it is presumed to have significant influence, unless it can be clearly demonstrated to the contrary. Conversely, if the entity owns, directly or indirectly (for example through subsidiaries), less than 20% of the votes exercisable at the General Meeting of an investee company, it is presumed to have no significant influence, unless such influence can be clearly demonstrated. Even if another entity has an absolute or relative majority, this does not necessarily preclude an entity from having significant influence.

The existence of significant influence for an entity is usually indicated by the occurrence of one or more of the following circumstances: (a) representation on the Board of Directors, or equivalent body, of the investee; (b) participation in the decision-making process, including participation in decisions about dividends or other profit distributions; (c) the presence of material transactions between the investor and the investee; (d) the exchange of managerial personnel; (e) the provision of essential technical information.

JOINT VENTURE: has the meaning given to it in IFRS 10, IFRS 11 (*Joint Control Agreements*) and IAS 28 (*Investments in Affiliates and Joint Ventures*) and is used with the meaning specified in those IFRSs (see IAS 24, paragraph 9).

RPTs OF MAJOR IMPORTANCE: are the transactions of major importance, as defined in accordance with Article 6 below of this RPT Procedure.

RPTs OF MINOR IMPORTANCE: are transactions of minor importance, as defined in accordance with Article 7 below of this RPT Procedure.

TRANSACTIONS CARRIED OUT THROUGH SUBSIDIARIES: are transactions carried out by the subsidiaries of Reno De Medici under Article 2359 of the Civil Code with Related Parties of the latter.

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TRANSACTIONS WITH RELATED PARTIES OR RPT: are the transactions defined as such by the international accounting standards adopted in accordance with the procedure set out in Article 6 of EC Regulation 1606/2002. In particular, under the Annex to the RPT Regulation, a related party transaction is a transfer of resources, services or obligations between a company and a Related Party, irrespective of whether a consideration is agreed (see IAS 24, paragraph 9).

Such transactions include:

- mergers, demergers by incorporation or demergers in the strict non-proportional sense, if carried out with Related Parties;
- decisions relating to the attribution of remuneration and economic benefits, in any form, to members of the administration and control bodies and to other Executives with Strategic Responsibilities.

RELATED PARTIES: are the parties defined as such by the international accounting standards adopted according to the procedure described in Article 6 of EC Regulation 1606/2002. In particular, a related party is a person or entity that is related to the reporting entity.

- (a) A person or an immediate family member of that person is related to an entity that reports if that person:
 - (i) has Control or Joint Control over the reporting entity;
 - (ii) has significant influence over the reporting entity; or
 - (iii) is a member of the Executives with Strategic Responsibilities of the reporting entity or one of its parents.
- (b) An entity is related to a reporting entity if either of the following applies:
 - (i) the entity and the reporting entity are members of the same group (which means that each parent, subsidiary and member of the group is related to the others);
 - (ii) an entity is an associate or *joint venture* of the other entity (or an associate or *joint venture* that is part of a group of which the other entity is a member);
 - (iii) both entities are *joint ventures* of the same third party;
 - (iv) one entity is a *joint venture* of a third entity and the other entity is an associate of the third entity;
 - (v) the entity is a post-employment benefit plan for the benefit of employees of the reporting entity or an entity related to the reporting entity;
 - (vi) the entity is controlled or jointly controlled by a person identified in (a);
 - (vii) a person identified in (a)(i) has significant influence over the entity or is a member of the Executives with Strategic Responsibilities of the entity (or of a parent of the entity) (see IAS 24, paragraph 9).

It should be noted that in reviewing any related party relationship attention should be paid to the substance of the relationship and not simply its legal form (see IAS 24, paragraph 10).

INDIRECT RELATED PARTY: the Related Party from time to time identified by the Direct Related Party and communicated to the Company by means of Annex 1 of this RPT Procedure.

BORSA ITALIANA MARKET REGULATIONS: are the rules of the markets organised and managed by Borsa Italiana S.p.A.

ISSUERS' REGULATIONS: the Regulations adopted by Consob resolution no. 11971 of 14 May 1999, as subsequently amended and supplemented.

RPT REGULATION: this is the Regulation on Related Party Transactions adopted by Consob resolution no. 17221 of 12 March 2010 and subsequently amended and supplemented by resolutions no. 17389

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of 23 June 2010, no. 19925 of 22 March 2017, no. 19974 of 27 April 2017 and, most recently, no. 21624 of 10 December 2020.

HEAD OF LEGAL AND CORPORATE AFFAIRS: the person in charge of the Legal and Corporate Affairs Office at Reno De Medici.

ASSOCIATED COMPANY: an entity, including one without legal personality (as is the case with a partnership) where a shareholder exercises Significant Influence but not Control or Joint Control.

SUBSIDIARY: an entity, including one without legal personality (as is the case with a partnership) over which another entity exercises Control.

CLOSE FAMILY MEMBERS: a person's close family members are those family members who are expected to influence, or be influenced by, that person in their dealings with the Company, including:

- (a) the children and spouse or cohabitant of that person;
- (b) the children of that person's spouse or cohabitant;
- (c) the dependants of that person or of a spouse or cohabitant (see IAS 24, paragraph 9).

TUF: is Legislative Decree no. 58 of 24 February 1998 and subsequent amendments and additions.

3. SCOPE

3.1 The RPT Procedure establishes the principles and rules to which Reno De Medici adheres and aims to:

- (i) identify the various categories of RPTs carried out by the Company directly or through subsidiaries;
- (ii) determine the relevant decision-making process;
- (iii) fulfil the relevant reporting obligations.

4. REGISTER OF RELATED PARTIES

4.1 The Related Parties of Reno De Medici are included and ordered in a specific electronic file (hereinafter the "**Register of Related Parties**") managed by the Company and open to consultation, by means of access to a specific folder on the company network, by the Company Representatives of the Company and its Subsidiaries.

4.2 The maintenance and updating of the Register of Related Parties is the responsibility of the Company's Legal Affairs Department, in the person of its manager (hereinafter, the "**Head of the Legal and Corporate Affairs Office**"), who makes entries to it: (i) on the basis of information and documentation in the company's records, with the support of the competent departments of the Company and its Subsidiaries; (ii) on the basis of written declarations made by Direct Related Parties by compiling Schedule 1 of this RPT Procedure. The Head of the Legal and Corporate Affairs Office manages the archive with all the information useful for the identification of Related Parties, including in compliance with the provisions of the legislation on the processing of personal data (see Regulation (EU) no. 679/2016, the so-called "GDPR"), by transmitting to the persons registered in the Register of Related Parties the specific information set out in Annex 1 of this RPT Procedure.

4.3 At all times, Related Parties, including on behalf of Indirect Related Parties, must promptly communicate to the Legal and Corporate Affairs Office the information necessary to enable the fulfilment of the obligations established in the RPT Procedure. Without prejudice to the disclosure

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requirements set out in this paragraph, at the time and within the deadlines set out in the Regulation of Borsa Italiana, the Head of the Legal and Corporate Affairs Office will send a confirmation request form by email to the Executives with Strategic Responsibilities, under Annex 1 of this RPT Procedure. The addressees must return the completed Annex 1 within five (5) days of receipt. Failure to reply within the deadline indicated therein will be equivalent to declaring “no change” from the information previously provided.

- 4.4** In addition to the above, in order to ensure compliance with the principles of managerial transparency established in the RPT Procedure and in the Code of Ethics, the Company will in all cases request that persons with external powers of representation with a notarial power of attorney notify whether they manage and/or are aware of relationships with entities that, according to the provisions of this RPT Procedure, could be considered Related Parties.

5. PROCEDURE FOR THE IDENTIFICATION AND APPROVAL OF RPTs

- 5.1** The Corporate Officer, as soon as possible and based on the characteristics of the transaction and available information:

- must verify whether the counterparty is a Related Party by consulting the Related Parties Register;
- if the counterparty is a Related Party, he must immediately notify the Legal and Corporate Affairs Office in writing of all information relating to the transaction, such as, by way of example, the name of the counterparty, a description of the transaction, the terms thereof, and any other element useful for verification pursuant to Article 6.2 below.

- 5.2** The Head of Legal and Corporate Affairs determines:

- (i) whether the transaction is a Related Party Transaction
- (ii) whether the Transaction qualifies for one of the grounds for exemption provided for in Article 11 below and that there are no Significant Interests of other Related Parties of the Company;
- (iii) whether the transaction is implementing a framework resolution;
- (iv) whether the transaction qualifies as a significant or non-significant RPT.

For the purposes of ascertaining the above elements, the Head of the Legal and Corporate Affairs Office may consult with the *Chief Financial Officer* (CFO) of the parent company (if not directly involved in the assessment) and with the RPT Committee.

- 5.3** If the transaction qualifies as an RPT of Major Importance or an RPT of Minor Importance and does not qualify as an excluded transaction under Article 11 below or as a transaction implementing a framework resolution, the Head of the Legal and Corporate Affairs Office *initiates* the procedure, sending a communication to the Chairman of the RPT Committee and, for information, to the Chairman of the Supervisory Board, the Managing Director and the Company Representative containing:

- a) a description of the transaction, an indication of its value, terms and expected completion date and an indication of whether it qualifies as a an RPT of Major Importance or as an RPT of Minor Importance;
- b) details of the Related Party involved and the nature of the relationship;

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- c) an explanation of the Company's reasons for its interest in carrying out the transaction and any risks;
- d) any other information useful to the RPT Committee for the performance of their duties.

5.4 The Chairman of the RPT Committee will call a Committee meeting without delay to examine and assess the information received and to begin the investigation necessary to examine the RPT and prepare the opinion. He will also notify the Managing Director, the Corporate Officer and the Legal and Corporate Affairs Office of the deadline necessary to perform his work, when this is longer than the time envisaged for carrying out the transaction. To this end, the Committee may (a) request the assistance of the heads of the Company's internal departments, (b) assign to one or more of its members, who will assume the status of Liaison Officer(s), the task of monitoring the phases of negotiations and investigation of the transaction, if the transaction is classed as a Material Transaction.

5.5 At the end of the activities referred to in Article 5.4 above, the Chairman of the RPT Committee will promptly inform the Head of the Legal and Corporate Affairs Office, the Legal Representative of the RPT and, for information, the Chairman of the Supervisory Board of the decisions taken by the RPT Committee.

5.6 Articles 6 and 7 below apply to RPTs of Major Importance and RPTs of Minor Importance, respectively.

6. PROCEDURE FOR TRANSACTIONS OF MAJOR IMPORTANCE

6.1 For the purposes of this RPT Procedure, RPTs of Major Importance (hereinafter, the "**RPTs of Major Importance**") are defined as the following RPTs:

- (a) RPTs for which at least one of the materiality ratios (as defined below), applicable depending on the specific transaction, exceeds 5%;
- (b) RPTs with a listed parent company (where one exists), or with persons related to the latter who in turn are also related to Reno De Medici, if at least one of the Materiality Indicators (as defined below) exceeds 2.5%;
- (c) RPTs that may affect the Company's management autonomy (including those relating to intangible assets) or that in any case relate to assets or property of strategic importance for the Company, if the value of at least one of the Materiality Indicators (as defined below) exceeds 2.5%. Assessment of the strategic importance of certain property or assets of the Company is entrusted, without exception, to the Board of Directors, which resolves on this matter from time to time, on the initiative of even only one of its members, or at the request of the Supervisory Board.

6.2 For the purposes of identifying RPTs of Major Importance under the RPT Regulation, the following materiality ratios (hereinafter, the "**Materiality Ratios**") will apply:

- (a) Consideration test: identifies the relationship between the countervalue of the RPT and the shareholders' equity taken from the most recent consolidated balance sheet published by Reno De Medici or, if greater, the market capitalisation of Reno De Medici recorded at the end of the last open market day of the reporting period of the most recent published periodic accounting document (annual or half-yearly financial report or interim report on operations).

If the economic conditions of the RPT are determined, the countervalue of the RPT is:

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- i. for cash components, the amount paid to or by the contractual counterparty;
- ii. for components consisting of financial instruments, the *fair value* determined, at the date of the RPT, in accordance with international accounting standards;
- iii. for RPTs comprising loans or guarantees, the maximum amount payable.

If the economic conditions of the RPT depend, in whole or in part, on amounts not yet known, the countervalue of the RPT is the maximum amount that can be received or is payable under the agreement.

- (b) Gross assets test: identifies the ratio of the gross assets which are the subject of the transaction to the gross assets of Reno De Medici. The data to be used must be taken from the most recent consolidated balance sheet published by Reno De Medici. Where possible, similar data should be used to determine the gross assets of the entity which is the subject of the transaction. For transactions involving the purchase or sale of equity investments in companies that affect the scope of consolidation, the numerator value is the gross assets of the investee company, regardless of the percentage of capital which is the subject of the transaction.

For transactions involving the acquisition and sale of equity investments in companies that do not affect the scope of consolidation, the numerator value is:

- i. in the case of acquisitions, the value of the RPT plus any liabilities of the acquiree assumed by the acquirer;
- ii. in the event of disposals, the consideration for the asset sold.

For the purchase and sale of assets other than equity investments, the numerator value is:

- i. in the case of acquisitions, the greater of the consideration and the carrying value that will be attributed to the asset following the transaction;
- ii. in the case of disposals, the carrying value attributed to the asset before the transaction.

- (c) Gross liabilities test: identifies the ratio of the gross liabilities of the entity acquired to the *gross assets* of Reno De Medici. The data to be used must be taken from the most recently published consolidated balance sheet. Where possible, similar data should be used to determine the gross liabilities of the acquired company or business unit.

6.3 For the purposes of this Procedure, all RPTs that cannot be defined as Material RPTs pursuant to Articles 6.1 and 6.2 above are defined as RPTs of Minor Importance ("**RPTs of Minor Importance**"), without prejudice to the fact that transactions that qualify as exclusions and exemptions as indicated in Article 11 below do not fall within the definition of Material RPTs or Non-Material RPTs.

6.4 RPTs of Major Importance, which do not fall within the purview of the General Meeting, are approved by the Board of Directors subject to the binding, reasoned and favourable opinion of the RPT Committee on (i) the existence of the Company's interest in carrying out the transaction and (ii) the appropriateness and substantive fairness of the related conditions provided for in Articles 6.1 and 6.2 above. This opinion is attached to the minutes of the RPT Committee meeting. The RPT Committee and, where appointed, the contact(s) will be involved in the negotiation and preliminary phase of the RPT by receiving a complete and timely flow of information and with the

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right to request information and make comments to the Company Representative; during the negotiation and preliminary phase, the RPT Committee must be constantly and promptly updated in writing on the progress of negotiations and any changes in the conditions, terms and/or essential characteristics of the transaction. It is in any case understood that, if a specific RPT of Major Importance falls within the competence of the Board of Directors, the Directors involved in the Transaction must abstain from voting on it, without prejudice to their right to attend the meeting.

- 6.5 If, in respect of a certain Non-Material RPT, there are not at least two Unrelated Independent Directors on the RPT Committee, the Committee's functions will be performed by the only Unrelated Independent Director, or in the alternative by an independent and unrelated external expert duly appointed by the Board of Directors.
- 6.6 The RPT Committee or the Liaison Officer(s) may, if deemed appropriate, use the services of one or more independent experts chosen independently by the RPT Committee appointed by the Company at its expense. The RPT Committee also verifies in advance the independence of the experts, taking into account any economic, equity and financial relations between the independent experts and (i) the related party, its subsidiaries, its parent companies, the companies subject to joint control and the directors of the above companies; (ii) the companies, its subsidiaries, its parent companies, the companies subject to joint control and the directors of the above companies. Where a request is made by the RPT Committee or by the Liaison Officer(s), the above experts, subject to coordination with the Corporate Officer, may take part in the ongoing negotiations, participating in meetings with counterparties and/or with any consultants appointed by the Company involved in various ways in the study and structuring of the transaction and will receive the relevant documentation promptly.
- 6.7 The RPT Committee must express its opinion with a clear indication of whether or not the RPT Committee is in favour of concluding the RPT in good time for the meeting of the Board of Directors called to resolve on the RPT.
- 6.8 The Board of Directors, convened to approve the RPT, will receive from the Corporate Officer through the Legal and Corporate Affairs Office - in time for approval - information on the RPT to be carried out pursuant to Article 5.3 above, with an indication of the outcome of the investigation, together with a copy of the opinion of the RPT Committee referred to in the previous paragraph and any other opinions issued in relation to the RPT. This information must also be sent to the Chairman of the Supervisory Board.
- 6.9 If the RPT is approved, the minutes of the board meeting will provide adequate proof of the Company's interest in carrying out the transaction and of the reasonableness and substantial fairness of the respective terms and conditions.

7. PROCEDURE FOR TRANSACTIONS OF MINOR IMPORTANCE

- 7.1 RPTs of Minor importance, which are not the responsibility of the General Meeting, are approved by the Board of Directors or by the delegated bodies which, as appropriate, have competence in relation to the specific RPT of Minor Importance on the basis of the powers conferred on them by virtue of the Board resolution appointing them as the delegated body of *Reno De Medici* (hereinafter, the "**Delegates**"). If they deem it appropriate, the Delegated Bodies may always submit the Non-Material RPTs for collective approval of the Board of Directors, with respect to any RTPs for they have competence. It is in any case understood that, if a specific RPT of Minor Importance falls within the competence of the Board of Directors, the Directors involved in the Transaction must abstain from voting on it, without prejudice to their right to attend the meeting.

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7.2 RPTs of Minor Importance may not be carried out without the prior, non-binding, reasoned opinion of the RPT Committee regarding:

- (i) the existence of an interest on the part of the Company in carrying out the transaction;
- (ii) the reasonableness and substantial fairness of the relevant terms and conditions.

This opinion is attached to the minutes of the RPT Committee meeting.

7.3 The RPT Committee may, if deemed appropriate, use the services of one or more independent experts chosen independently by the Committee and appointed by the Company at its expense. The RPT Committee verifies in advance the independence of the experts, taking into account the reports indicated in paragraph 6.5.

7.4 If, in respect of a certain RPTs of Minor Importance, there are not at least two Unrelated Independent Directors on the RPT Committee, the Committee's functions will be performed by the only Unrelated Independent Director, or in the alternative by an independent and unrelated external expert duly appointed by the Board of Directors.

7.5 The RPT Committee must express its opinion with a clear indication of whether or not it is in favour of concluding the RPT in sufficient time for the approval or conclusion of the RPT, if it is not subject to prior approval.

7.6 The body or department with competence to decide on the RPT will receive from the Corporate Officer through the Legal and Corporate Affairs Office - in time for approval - information on the RPT to be carried out pursuant to Article 5.3 above, with an indication of the outcome of the investigation, together with a copy of the opinion of the RPT Committee referred to in the previous paragraph and any other opinions issued in relation to the RPT. This information must also be sent to the Chairman of the Supervisory Board.

7.7 The minutes approving the RPT will provide adequate proof of the Company's interest in carrying out the transaction and of the reasonableness and substantial fairness of the respective terms and conditions. In the event that the decision regarding the RPT is the responsibility of a non-collegial body (the so-called Delegated Bodies and others such as, by way of example but not limited to, the Sole Director of a company controlled by Reno De Medici or a Reno De Medici Corporate Officer or a subsidiary), said decision must be set out in writing and must likewise provide adequate proof of the Company's interest in carrying out the transaction and for the reasonableness and substantial fairness of the respective terms and conditions; once the transaction has been concluded, detailed information must, in all cases, be provided at the first possible meeting of the Company's Board of Directors.

7.8 The Head of Legal and Corporate Affairs, at least once a quarter, reports on the performance of RPTs of Minor Importance and provides all necessary documentation for a clear representation of such RPTs to the Board of Directors, the Supervisory Board and the RPT Committee on the performance of RPTs of Minor Importance.

8. TRANSACTIONS WITHIN THE COMPETENCE OF THE GENERAL MEETING

8.1 If, on the basis of legal provisions or the Articles of Association, the RTPs are the responsibility of the General Meeting or must be authorised by it, during the negotiation, investigation and approval of the draft resolution to be submitted to the General Meeting, the procedure mentioned respectively in the following will be observed *mutatis mutandis*:

- Article 6 for RPTs of Major Importance;

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- Article 7 for RPTs of Minor Importance;

except as provided in paragraph 8.2 below.

8.2 If, despite the contrary or negative opinion of the RPT Committee, the proposed resolution is approved by the Company's Board of Directors and submitted to the General Meeting, the following procedure applies, whether the RPT is an RPT of Major Importance or an RPT of Minor Importance:

- for RPTs of Major Importance: the Board of Directors, in submitting the proposed resolution to the General Meeting, makes its effectiveness and/or executability subject to the approval of the General Meeting, under Article 2364, paragraph 1, number 5, of the Civil Code. Specifically, the General Meeting resolves, in accordance with Article 11, paragraph 3, of the RPT Regulation, provided that:
 - 1) the *quorums* required by the Articles of Association of the Company for constituting meetings and passing resolutions are reached; and
 - 2) if the unrelated shareholders present at the General Meeting represent at least 10% of the share capital with voting rights, the majority of the unrelated shareholders voting vote in favour of the transaction.

The status of related or unrelated shareholder will be declared by the Chairman of the General Meeting, on the basis of available information contained in the RPT register referred to in Article 4 above. The minutes of the General Meeting must record the methods and the results of the voting and must include, in an annex, details of shareholders who voted in favour, abstained or voted against. The Chairman of the Meeting will be responsible for identifying the related and the unrelated shareholders, as above.

- for RPTs of Minor importance: the transaction is approved by the General Meeting with the majorities envisaged in the Articles of association.

9. TRANSACTIONS CARRIED OUT THROUGH SUBSIDIARIES

9.1 Transactions carried out through Subsidiaries are subject to prior approval by the Company's Corporate Bodies or Officers in the manner and under the terms specified below.

9.2 The Company Representative - without delay - will carry out the checks and draw up the report referred to in Article 5.1 above and send it to the Head of the Legal and Corporate Affairs Office. The Legal and Corporate Affairs Office carries out the investigations required under Article 5.2 above according to the procedures set out therein.

9.3 If the transaction qualifies as an RPT of Major Importance or a Non-RPT of Major Importance and does not qualify as an excluded transaction under Article 11 below or as a transaction implementing a framework resolution (see Article 12 below), the Head of the Legal and Corporate Affairs Office initiates the *procedure* in accordance with the procedures and terms set out in Article 5.3 above.

9.4 Articles 5.4, 5.5, 5.6 and so on, depending on the size of the PPO, Articles 6 and 7 also apply, subject to the following:

- (i) approval of the Transaction concluded through a Subsidiary must be given by the Board of Directors or by the competent Delegated Body of Reno De Medici, following the issue of

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the reasoned opinion of the RPT Committee which, depending on the materiality of the RPT, will be binding or non-binding respectively;

- (ii) that opinion should be sent to the person with the power to approve the transaction and forwarded by that person to the corporate bodies of the subsidiary with the power to resolve on the transaction [or to carry it out];
- (iii) the person responsible for approving the transaction ensures compliance with the provisions of Article 10.7 below;

9.5 Depending on the value of the transaction or its maximum foreseeable amount, Articles 10.1 and 10.2 will apply in the case of RPTs of Major Importance or Article 10.4 in the case of RPTs of Minor Importance.

9.6 Framework resolutions for Transactions carried out through Subsidiaries are permitted under the conditions established, *mutatis mutandis*, in this Article.

10. DISCLOSURE OF TRANSACTIONS

10.1 On the occasion of RPTs of Major Importance, carried out also through Subsidiaries, the Company prepares, under Article 114, paragraph 5, of the TUF, an information document drawn up in accordance with Annex 4 of the RPT Regulation.

10.2 The Company also prepares this information document if, during the year, transactions with a Related Party or with parties associated with both the latter and the Company, a series of similar transactions or transactions carried out to achieve a single purpose are undertaken which, although not individually classifiable as Material Transactions, exceed, in the aggregate, the materiality thresholds indicated in the RPT Regulations. For the purposes of this paragraph, transactions in any way excluded from the application of this Procedure are not considered.

10.3 Without prejudice to the provisions of Article 17 of Regulation (EU) No. 596/2014, the disclosure document will be made available to the public (at the registered office and in the manner indicated in Part III, Title II, Chapter I, of the Issuers' Regulations) within 7 (seven) days of its approval by the competent body or, if the competent body resolves to submit a contractual proposal, from the time when the contract, including a preliminary one, is concluded in accordance with the applicable regulations. If the General Meeting has the power or authorisation to do so, the same disclosure document will be made available within 7 (seven) days of the passage of the proposal to be submitted to the General Meeting.

10.4 If the RPT Committee has issued a negative opinion on the RPTs of Minor Importance, RDM (within 15 (fifteen) days of the end of each quarter of the financial year) must make available to the public (at the registered office and in the manner indicated in Part III, Title II, Chapter I, of the Issuers' Regulations) a document containing details of the counterparty, the purpose and the consideration of the RPTs of Minor Importance approved in the quarter of reference, notwithstanding the aforementioned negative opinion, as well as the reasons for not agreeing with the said opinion. Within the same period, the opinion of the RPT Committee will be made available to the public as an annex to the disclosure document or on the Company's *website*.

10.5 In the same terms as those set out in paragraph 10.3 above, the Company will make available to the public, as an annex to the information document or on its *website*, any opinions issued by the independent experts chosen in accordance with paragraph 6.5 above, as well as the opinions issued by experts qualified as independent which the Board of Directors has used.

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- 10.6** If a Related Party Transaction is disclosed by means of the dissemination of a press release under Article 17 of Regulation (EU) No. 596/2014, the latter will contain, in addition to the other information to be published under the above rule, also the information required by Article 6 of the RPT Regulation. Specifically, the above communication must specify:
- (i) the description of the transaction;
 - (ii) an indication that the counterparty to the transaction is a Related Party and a description of the nature of the relationship;
 - (iii) the name or business name of the counterparty to the transaction;
 - (iv) whether or not the transaction exceeds the Relevance Indices and an indication of whether or not a disclosure document will subsequently be published under this Article 10;
 - (v) the procedure that has been or will be followed for the approval of the transaction and, in particular, whether the Company has availed itself of a case of exclusion provided for by Articles 13 and 14 of the RPT Regulation;
 - (vi) any approval of the transaction despite the contrary opinion of the independent directors who are members of the RPT Committee.
- 10.7** The Managing Director will provide the Board of Directors and the Supervisory Board of Reno De Medici with a quarterly report indicating the main characteristics of RPTs concluded and Transactions carried out through Subsidiaries, even where such transactions have been exempted under Article 11 below, without prejudice in any case to the report to be made at least annually to the RPT Committee with reference to exempted transactions as per paragraph 11.4 below.
- 10.8** In the event of waiver of the publication obligations provided for RPTs of Major Importance referred to in this Article 10, without prejudice to the provisions of Article 17 of Regulation (EU) No. 596/2014, the Legal and Corporate Affairs Office will ensure compliance with the disclosures referred to in Article 13, paragraph 3, letter c), of the RPT Regulation.
- 10.9** The interim management report and the annual management report must contain the information referred to in Article 5(8) of the RPT Regulation.

11. CASES OF EXEMPTION

- 11.1** Without prejudice to the mandatory provisions of the RPT Regulation, the following Related Party Transactions are exempt from application of the procedural and transparency rules established by the RPT Regulation and by the provisions of this RPT Procedure, even if carried out through Subsidiaries:
- (i) RPTs for small amounts (hereinafter "**Immaterial RPTs**"), i.e. with a value of less than Euro 100,000.00 (one hundred thousand/00) per transaction, if the counterparty is a legal entity, or less than Euro 50,000.00 (fifty thousand/00) per transaction, if the counterparty is a natural person;
 - (ii) resolutions passed by the General Meeting under Article 2389, paragraph 1, of the Civil Code, relating to the remuneration of the members of the Board of Directors and the Executive Committee;
 - (iii) resolutions regarding the remuneration of directors holding particular offices within the overall amount previously determined by the General Meeting under Article 2389, paragraph 3, of the Civil Code;

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- (iv) resolutions passed at General Meetings pursuant to Article 2402 of the Civil Code concerning fees due to members of the Supervisory Board;
- (v) transactions resolved by the Company and addressed to all shareholders on an equal basis, including:
 - (a) rights issues, including those servicing convertible bonds, and free capital increases as provided for in Article 2442 of the Civil Code;
 - (b) demergers in the strict sense, both total and partial, with criteria for the proportional allocation of shares;
 - (c) reductions in the share capital by means of reimbursement to shareholders under Article 2445 of the Civil Code and purchases of treasury shares under Article 132 of the TUF;
- (vi) resolutions (other than those already excluded from the scope of application of the RPT Regulation, pursuant to Article 13, paragraph 1, thereof) on the remuneration of Directors vested with particular responsibilities, together with other Executives with Strategic Responsibilities, on condition that:
 - the Company has adopted a remuneration policy approved by the General Meeting;
 - a Committee, consisting exclusively of non-executive directors, the majority of whom are independent, was involved in defining the remuneration policy;
 - the remuneration awarded is identified in accordance with this policy and quantified on the basis of criteria that do not involve discretionary assessments;
- (vii) compensation plans based on financial instruments approved by the General Meeting under Article 114-*bis* of the TUF and related transactions;
- (viii) Intragroup RPTs with or between Subsidiaries (including jointly) by Reno De Medici and RPTs with Associated Companies and between Subsidiaries and Associate Companies, provided that the Subsidiaries or Associate Company counterparties of the RPT do not identify any interest as significant (“**Significant Interest**”).

For the purposes of this RPT Procedure, Significant Interests are considered to be:

- Interests pertaining to assets or assets of strategic importance for the Company pursuant to paragraph 6.1(c) above if at least one of the Materiality Indicators exceeds 2.5%;
- Interests held by the entity controlling Reno De Medici, where the equity interest held by that entity (even indirectly) in the counterparty company which is the subject of the RPT, controlled by or associated with Reno De Medici, is actually greater than that the equity interest held by the same entity in Reno De Medici;
- The interests of the controlling entity of Reno De Medici and/or of the executive directors of RDM for which an economic value exceeding the threshold for RPTs of Minor Importance referred to in paragraph 11.1 (i) above may be identified;
- All interests of Related Parties defined as significant by a specific resolution of the Board of Directors. The Board of Directors will resolve upon the significance of the

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interests of a Related Party, including at the initiative of only one of its members or at the request of the Supervisory Board.

The procedures to be followed for the management of and information on the presence of Significant Interests are laid down in Article 12 below.

11.2 In addition, the procedural requirements of the RPT Regulation are exempt, where expressly permitted by the Articles of Association, from the application of RPTs to be adopted on an urgent basis (hereinafter, the "**Urgent RPTs**") under the conditions set out in paragraph 11.3 below, without prejudice to the provisions of Article 5 of the RPT Regulation and the reservation of authority to resolve by the Board of Directors under Article 8, paragraph 1, letter a) of the RPT Regulation, applicable to RPTs of Major Importance.

11.3 The Company may decide not to apply the provisions of this RPT Procedure in the event of Urgent RPTs but must fulfil the following requirements:

a) for RPTs that do not fall within the competence of the General Meeting, nor are subject to authorisation by the General Meeting:

- (i) if the RPT to be carried out is the responsibility of a delegated body, the Chairman of the Board of Directors and the Lead Independent Director, if appointed, must be informed by the Head of the Legal and Corporate Affairs Office of the reasons for the urgency in a timely manner and, in any case, before the transaction is carried out;
- (ii) the RPTs must subsequently be the subject, without prejudice to their effectiveness, of a non-binding resolution adopted by the next possible Ordinary General Meeting;
- (iii) the body convening the General Meeting held to resolve pursuant to point (ii) above must produce a report with an explanation of and setting out the reasons for the urgency;
- (iv) the control body must notify the General Meeting of its opinion on the existence of reasons for such urgency;
- (v) the report and the valuations referred to in points (iii) and (iv) above must be made available to the public at least 21 (twenty-one) days prior to the date set for the General Meeting referred to in point (ii) above, at the Company's registered office and in the manner indicated in Part III, Title II, Chapter I, of the Issuers' Regulations. These documents may be contained in the information document referred to in Article 5, paragraph 1, of the CONSOB Regulation;
- (vi) information on the results of the vote, with particular regard to the total number of votes cast by unrelated shareholders, must be made available to the public (in the manner set out in Part III, Title II, Chapter I, of the Issuers' Regulation) on the day after the General Meeting referred to in point (ii) above,

b) for RPTs that fall within the competence of the General Meeting, or that must be authorised by the General Meeting, where provided for by the Articles of Association, which are urgent and relate to situations of corporate crisis, meaning, by way of example:

- cases of significant losses under Articles 2446 and 2447 of the Civil Code;

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- situations in which the Company is subject to insolvency proceedings or situations in which the Company or its auditor is uncertain as to the going concern;
 - financial distress that is expected to result in a significant and rapid decline in capital pursuant to Articles 2446 and 2447 of the Civil Code referred to above.
- c) the body required to convene the General Meeting must produce a report containing reasonable grounds for the urgency;
- d) the control body must notify the General Meeting of its opinion on the existence of reasons for such urgency;
- e) the report and opinions referred to in points (ii) and (iii) above must be made available to the public (at least 21 (twenty-one) days before the date set for the General Meeting), at the registered office and according to the procedures set out in Part III, Title II, Chapter I, of the Issuers' Regulation. Such documents may also be contained in the disclosure document referred to in Article 10 of this RPT Procedure;
- f) if the opinions of the control body referred to in point (iii) above are negative, the General Meeting must resolve according to the *whitewash* mechanism;
- g) if the opinions are positive, information on the results of the vote, with particular regard to the total number of votes cast by unrelated shareholders, must be made available to the public (in the manner set out in Part III, Title II, Chapter I, of the Issuers' Regulation) on the day after the General Meeting,

11.4 The members of the RPT Committee will receive information from the Head of Legal and Corporate Affairs on the application of the exemption cases provided for in this Article 11 at least annually.

12. DISCLOSURE REQUIREMENTS IN THE EVENT OF SIGNIFICANT INTERESTS

12.1 If a member of the Board of Directors or the Supervisory Board of the Company or a Subsidiary has Significant Interests, as set out in paragraph 11.1 (ix) above, the following procedure will apply:

- (i) Before discussing any single point on the agenda of the board meeting, each director and statutory auditor must disclose any interests held by them or on behalf of third parties in relation to the matter or issue to be discussed, specifying its nature, terms, origin and scope.
- (ii) If the Chairman or Managing Director has such an interest and is responsible for the Transaction, he/she will refrain in any event from concluding the Transaction and will discuss the matter with the Board of Directors;
- (iii) For board resolutions, the Directors concerned generally do not participate in the discussion and deliberation of material issues and leave the meeting. However, the Board of Directors' resolution must provide justification that the transaction is fair and reasonable for the Company.

13. FRAMEWORK RESOLUTIONS

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- 13.1** For the purposes of this Procedure framework resolutions are allowed so that the Company can carry out a series of similar transactions with certain Related Parties to be identified by the Board of Directors.
- 13.2** Framework resolutions must be effective for no more than one year and must indicate, with sufficient certainty, the transactions that are the subject of the resolutions themselves, indicating the expected maximum amount (hereinafter, the "**Maximum Amount**") of the transactions to be carried out during the reference period and the reasons for the conditions envisaged in relation to such transactions.
- 13.3** Framework resolutions are subject to the provisions of Articles 6 and 7 above depending on the foreseeable Maximum Amount of the transactions covered by the specific framework resolution calculated in the aggregate.
- 13.4** The Managing Director reports to the Board of Directors and to the Supervisory Board at least once a quarter on the execution of each framework resolution.
- 13.5** On approval of the framework resolution, the Company will publish an information document, in accordance with the provisions of the RPT Regulation, if the foreseeable Maximum Amount to which it relates exceeds the threshold for Material Transactions.

14. FINAL PROVISIONS

- 14.1** For anything not expressly governed by this Procedure, the RPT Regulation will apply.
- 14.2** Amendments and additions to this RPT Procedure are approved by the Reno De Medici Board of Directors with the favourable opinion of the RPT Committee. The amendments will be published without delay on the Company's *website* and will be mentioned in the financial reports and in the first *corporate governance report* under Article 123-bis of the TUF following their publication.
- 14.3** The Supervisory Board will monitor the conformity of the RPT Procedure with the applicable regulations, as well as its compliance, and reports to the General Meeting under Article 2429 of the Civil Code.
- 14.4** The Company will promptly inform the competent bodies of Subsidiaries of the adoption and/or amendments made to this Procedure, so that they may adopt adequate procedures to enable compliance with the provisions relating thereto at their next meeting or without delay.

ANNEX 1.

DECLARATION OF RELATED PARTIES

I, the undersigned _____,

domiciled in _____, tax code _____,

in my quality as:

- Member of the Board of Directors
- Member of the Supervisory Board
- Member of Executives with Strategic Responsibilities
- Member of the Board of Directors of Cascades Inc., the controlling company
- Member of the Supervisory Board of Cascades Inc., the controlling company
- Member of Executives with Strategic Responsibilities of Cascades Inc., the controlling company

of **Reno De Medici S.p.A.**, having its registered office in Viale Isonzo no, 25, 20135 Milan, Italy, VAT no. 00883670150 (hereinafter referred to as the “**Company**”),

- provided that, in accordance with the **Italian Regulation on Related Parties** adopted by Consob (Commissione Nazionale per le Società e la Borsa) with resolution **no.17221 of March 12th, 2010**, later amended by resolutions no. 17389 of 23rd June 2010, no. 19925 of 22nd March 2017, no. 19974 of 27th April 2017 and no. 21624 of 10th December 2020 (hereinafter referred to as the “**Regulation**”), the parties defined as such by the International Accounting Standards adopted in accordance with the procedure referred to in Article 6 of Regulation (EC) No. 1606/2002, as mentioned in the Appendix of the Regulation, are considered as “**Related Parties**”;
- provided that I have taken note and I am perfectly aware of the meaning of “*Control*”, “*Joint Control*” “*Significant Influence*” and “*Close relatives of an individual*”, as defined by the International Accounting Standards mentioned in the Appendix of the Regulation:

HEREBY DECLARE

a) not to exercise control, Joint Control or significant influence on any company or own, directly or indirectly, a significant portion, in any case, not less than 20% of voting rights.

or

a) to exercise control, Joint Control or significant influence or own, directly or indirectly, a significant portion, but not less than 20% of voting rights, of the following entities:

Entity	Registered Office		Nature of the relationship of the individual with the entity (*)

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		Tax code and VAT Number	1. Control or Joint Control	2. Significant Influence – Participation equal or higher 20%	3. Significant Influence – representation in BoD or equivalent Entity of the participated or participation in the process decision making	4. Other

(*) Please select the applicable hypothesis from those relating to the nature of the control, indicating in box related details also with reference to the definitions

b) to have no close relatives within the meaning of the Regulation

or

b) that, according to the Regulation, the following are to be considered my Close Relatives:

Name and Surname	Residential address	Tax code and VAT number	Degree of Kinship

c) that the above-mentioned Close Relatives exercise control, Joint Control or significant influence or own, directly or indirectly, a significant portion, but not less than 20% of voting rights, of the following entities:

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Entity	Registered Office	Tax code and VAT Number	Nature of the relationship of the individual with the entity (*)			
			1. Control or Joint Control	2. Significant Influence – Participation equal or higher 20%	3. Significant Influence – representation in BoD or equivalent Entity of the participated or participation in the process decision making	4. Other

(*) Please select the applicable hypothesis from those relating to the nature of the control, indicating in box related details also with reference to the definitions

I hereby undertake, under my responsibility, to promptly communicate to the Legal Department of Reno De Medici S.p.A. any future variation or integration of the information herein contained.

Furthermore, I hereby declare to have been informed that the personal data collected with this declaration in the relative attachments they will be treated by the Company exclusively for the purposes related to the provisions of the Regulation, in compliance with the provisions relating to the processing of such data contained in the Regulation (EU) 2016/679 and other applicable legal provisions, including national ones, as well as information privacy attached here.

Yours faithfully,

Place: _____

Date: _____

Signature: _____

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Dear Sir/Madam,

pursuant to the applicable legislation on the protection of personal data (the "**Privacy Legislation**"), including Regulation (EU) 2016/679 (the "**GDPR**") and Italian Legislative Decree 196/2003 as amended by Italian Legislative Decree 101/2018, Reno De Medici S.p.A., as data controller (hereinafter the "**Company**" or the "**Data Controller**"), hereby informs you that it will process the personal data that you provide to the Company (the "**Personal Data**") for the purpose of complying with the Italian Regulation on Related Parties adopted by Consob with resolution no. 17221 of March 12th, 2010, later amended by resolutions no. 17389 of 23rd June 2010, no. 19925 of 22nd March 2017, no. 19974 of 27th April 2017 and no. 21624 of 10th December 2020 (the "**Regulation**") in the manner and for the purposes described herein.

1. PERSONAL DATA CONTROLLER AND DATA PROCESSOR

The Data Controller is Reno De Medici S.p.A., with registered office in Viale Isonzo 25, 20135, Milan, VAT Number 00883670150.

The Company has appointed a Data Protection Officer (in brief "**DPO**"), domiciled for the purpose at the Company's registered office, who can be contacted at the following addresses:

- postal address: Reno De Medici S.p.A.- Data Protection Officer: Viale Isonzo 25, 20135 - Milan (MI);
- DPO e-mail: dataprotectionofficer@rdmaroup.com.

2. DATA

The Data Controller will process your Personal Data, communicated by you or in any case acquired by the Data Controller.

The processing will have as object single operations, or a complex of operations, of treatment (such as mere example: collection, registration, organization, conservation, processing, communication, modification, selection, use), the data provided by the interested party and personal data relating to their straits family members, of the following personal data provided under the Declaration (the "**Personal Data**" or even "**Data**"):

- identification data of the interested party and / or dose family members, including, *inter alia*, name, surname and tax code;
- data relating to shareholdings held by the interested party and / or dose family members.

3. PURPOSES, LEGAL BASES OF PROCESSING AND RETENTION TIMES

The Company will process your Personal Data, without the need for your prior consent to the processing, for the following purposes and in compliance with the following legal bases:

3.1 PURPOSES RELATED TO COMPLIANCE WITH LEGAL OBLIGATIONS

Personal Data is processed for the following purposes:

- a) for and within the scope of the purposes for which the Declaration is made and, in particular, those provided for in the Procedure for Transactions with Related Parties of the Data Controller

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(including, for example, inclusion and the update of the Related Parties List and the keeping of the Transactions with Parties Register);

- b) fulfil the obligations provided for by the law, by a regulation, by the community legislation or by an Authority order, and in particular the CONSOB regulation containing provisions on the subject of transactions with related parties adopted with resolution no. 17221 of 12 March 2010 and subsequent amendments.

The processing of data for the purposes of sub a) and b) does not require the consent of the interested party as it is necessary to fulfil legal obligations or for the execution of a relationship of which the Interested Party is a party, pursuant to art. 6, paragraph 1, lett. b) and c), of the GDPR.

The retention period of your Personal Data is differentiated in accordance with the relevant legislation (for example, the mandatory retention period for records and correspondence is **10 years**, without prejudice to the need for preservation for other purposes as listed in this information note).

3.2 PURPOSES RELATED TO JUDICIAL PROTECTION OF THE DATA CONTROLLER

Personal Data is processed also for:

- c) exercise the rights of the Data Controller, for example the right to exercise a right in court.

These are purposes related to the protection of the Company's rights and the management of any complaints and/or disputes of any nature and at any level and in any instance, whether judicial or extrajudicial.

The legal bases of the processing are, depending on the type of processing and the dispute, the legal obligations and the legitimate interest in ascertaining, exercising or defending a right of the Data Controller within judicial proceedings; therefore, again here, in accordance with art. 6, paragraph 1, lett. f), of the GDPR.

The processing of data for the purpose of sub c) does not require the consent of the interested party as it is necessary to pursue the legitimate interests of the Data Controller, pursuant to

The period of retention of your Personal Data is differentiated in accordance with the applicable legislation, without prejudice to the need for retention for other purposes as listed in this information note.

4. HOW TO PROCESS YOUR PERSONAL DATA

The processing of your Personal Data is carried out manually and/or using IT and telematic means for the purpose indicated in Paragraph 3 above and, in any case, in a manner that guarantees their security and confidentiality.

We also inform you that your Personal Data:

- will be processed in accordance with the principles of legality, propriety and transparency;
- will be collected for the legitimate purposes established under Paragraph 3 above;
- will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, if necessary, up-to-date;

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- will be retained in a form that permits the identification of the data subject for a period of time not exceeding the achievement of the objectives, as specified in greater detail in Paragraph 3 above.

5. NATURE OF PERSONAL DATA PROVISION

The processing of your Personal Data is a legal obligation.

Any refusal by you to provide such Personal Data may result in the Company not being able to fulfil statutory obligations or to fulfil requests made by you.

6. PERSONAL DATA COMMUNICATION

Your Personal Data will be processed by employees of the Company specifically designated as authorized persons to process your personal data when necessary for the pursuit of the purposes set out in Paragraph 2 of this Information note.

Your Personal Data may be disclosed to additional the addressees, either as autonomous data controller or, where necessary, appropriately appointed data processors, including but not limited to:

- a. companies or other entities responsible for managing and maintaining the Company's Information Systems;
- b. Institutions and/or Public Authorities (Courts, the Consob Authority, etc.) to fulfil specific legal/regulatory obligations.

The full list of the addressees of your Personal Data is kept at the Data Controller's registered office and can be consulted on request using the contact details indicated in Paragraph 8 below.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Your Personal Data will not be subject to transfer to third countries outside the EU and will not be subject to transfer to the addressees other than those referred to in this note.

Any transfer of your Personal Data to countries outside the EU may take place only under the terms and with the guarantees stated by the Privacy Legislation and, in particular, pursuant to Articles 44-49 of the GDPR.

8. YOUR RIGHTS

The Company recalls that you are granted the rights set out in Articles 15-21 of the GDPR. In particular, you have the right to access your Personal Data, to request that they be rectified or updated if they are incomplete, incorrect or collected in violation of Privacy Legislation or their deletion, or to object to or restrict their processing. You are also entitled to receive (or to transmit directly to another data controller) the Personal Data concerning you in a structured, commonly used and machine-readable format.

You are also entitled to lodge a complaint with the Data Protection Authority if you believe that the processing of your personal data violates the Privacy Legislation.

You may exercise your rights at any time by simple request to transmit:

- by email, to the address: RDM-GDPR@gruppoRDM.com;
- DPO email: dataprotectionofficer@rdmgroup.com;
- by surface mail, to the registered office of Reno Fe Medici S.p.A. in: Viale Isonzo 25, 20135 - Milan (MI).