



ANTARES VISION
ANTARES VISION GROUP

ANTARES VISION S.P.A.

**PROCEDURE FOR THE HANDLING OF INSIDE INFORMATION AND FOR THE ESTABLISHMENT AND
MAINTENANCE OF THE REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION**

Approved by the Board of Directors on 22 February 2021



1. RECITALS AND LEGAL FRAMEWORK

- 1.1 This procedure (hereinafter the **Procedure**) is intended to regulate the management and treatment of Inside Information (as defined below) by Antares Vision S.p.A. (**Antares Vision** or the **Company** or the **Issuer**) and its subsidiaries (the **Subsidiaries**), as well as the establishment and maintenance by the Company of the Register (as defined below), by virtue of the listing of the Company's ordinary shares and warrants on the MTA, organised and managed by Borsa Italiana (**MTA**).
- 1.2 The purpose of this Procedure is to ensure compliance with the provisions of the law and regulations in force on the subject matter and to guarantee the respect of the utmost confidentiality and privacy of Inside Information, in order to avoid that the communication of documents and information concerning Antares Vision and/or its Subsidiaries be made selectively or in an untimely, incomplete or inadequate manner.
- 1.3 This Procedure is adopted by Antares Vision pursuant to Legislative Decree n. 58 of 24 February 1998, as subsequently modified (**TUF**), the respective technical implementation rules of the CONSOB Regulation adopted with resolution n. 11971 of 1999 (**CONSOB Regulation**) as subsequently amended, Regulation 596/2014 on market abuse ("Market Abuse Regulation") (**MAR**) and the respective implementing Regulations including Implementing Regulation (EU) 2016/347 of 10 March 2016 (**Regulation 347**) and Implementing Regulation (EU) 2016/1055 of 26 June 2016, CONSOB Communication No. 0061330 of 1 July 2016 concerning the methods of disclosure of the information required by the MAR, CONSOB Guidelines on the management of inside information No. 1/2017 - October 2017, the provisions on corporate information set forth in the regulations of the markets organised and managed by Borsa Italiana, the provisions on the management of inside information contained in the Code of Corporate Governance, adopted by the Committee for Corporate Governance of listed companies established at Borsa Italiana, as well as the provisions of Legislative Decree No. 231 of 8 June 2001 (**Legislative Decree No. 231/2001**), the ethical code and the organisational model adopted by the Company pursuant to the aforementioned Legislative Decree No. 231/2001.

2. DEFINITIONS

In addition to the terms defined in other parts of this Procedure, the following terms shall have the meaning ascribed to them herein:

Borsa Italiana: means Borsa Italiana S.p.A.;

CFO: means the person in charge of the office of Chief Financial Officer of the Company;

Chief Executive Officer: means each director of Antares Vision with management powers;

Competent Authority or **CONSOB:** means the Commissione Nazionale per le Società e la Borsa;

Employees: means the employees of the Issuer and its Subsidiaries who, by reason of their working activity or by reason of the functions performed, have access on a regular or occasional basis to Inside Information relating to the Company or its Subsidiaries;

Financial Instruments: means the financial instruments of the Company (a) admitted to trading on a regulated market or for which a request for admission to trading on a regulated market has been made; (b) traded on a multilateral trading facility, admitted to trading on a multilateral trading facility or for which a request for admission to trading on a multilateral trading facility has been made; (c) traded on an OTF; or (d) the price or value of which is dependent on, or has an impact on, a financial instrument referred to in (a)-(c) above (including, but not limited to, credit default swaps and financial contracts for differences);

Information Referent: means the person, appointed by the Board of Directors of the Company, responsible for carrying out the activities referred to in this Procedure. In case of impossibility or temporary absence of the Information Referent to perform his duties under the Procedure, he shall



be replaced by the Manager in charge of preparing the Company's accounting documents pursuant to and for the purposes of Article 154-bis of the TUF;

Inside Information: means information of a precise nature, which has not been made public, relating directly or indirectly to the Issuer or one of its Subsidiaries or to Financial Instruments (as defined below), and which, if made public, could have a material impact on the prices of such Financial Instruments or on the prices of related derivative financial instruments (the **Related Financial Instruments**);

For the purposes of this definition:

- a) Information shall be deemed to be of a "precise nature" if:
 - (1) It refers to a set of circumstances that exists and may reasonably be expected to come into existence or to an event that has occurred or may reasonably be expected to occur; and
 - (2) it is specific enough to enable a conclusion to be drawn as to the possible effect of the set of circumstances or event referred to in (i) on the prices of the Financial Instruments or Related Financial Instruments.

In the case of a protracted process which is intended to bring about, or which results in, a particular circumstance or event, that future circumstance or event and intermediate steps in that process which are linked to the bringing about or determination of the future circumstance or event, may be regarded as information of a precise nature.

- b) "Information which, if it were made public, would be likely to have a significant effect on the prices of Financial Instruments or Related Financial Instruments" means information that a reasonable investor would be likely to use as part of the basis of his investment decisions;
- c) an event or intermediate step in a protracted process is considered as an Inside Information when it, by itself, satisfies the above criteria;

Relevant Information: means any information concerning the Company (also with reference to one or more Subsidiaries), Financial Instruments or Related Financial Instruments that may, at a later (even nearer) time, become Inside Information, but which cannot yet be qualified as such due to the absence of one or more of the requirements indicated in the relative definition;

Relevant Person: means any person who is, within the Issuer or a Subsidiary:

- a) a member of the management or control body; or
- b) a senior manager who, although not a member of the bodies referred to in the previous point, has regular access to Inside Information directly or indirectly concerning the Company or one of its Subsidiaries and has the power to take management decisions that may affect the future development of the Company or one of its Subsidiaries;

SDIR: means the Regulated information disclosure service ("*Servizio per la diffusione dell'informativa regolamentata*") pursuant to CONSOB regulations.

SECTION 1

TREATMENT OF INSIDE INFORMATION

3. ADDRESSEES

- 3.1 Any persons, both natural and legal, who, by virtue of their work or professional activity, or by virtue of the functions they perform, have access, on a regular or occasional basis, to Relevant Information and Inside Information relating to the Company and its Subsidiaries, are required to keep confidential the



Relevant Information and Inside Information and the documents relating thereto acquired in the performance of their duties, as well as to comply with the provisions of this Procedure, and, in particular:

- a) Relevant Persons;
- b) Employees; and
- c) persons who perform their working and/or professional activity in favour of or on behalf of the Company and its Subsidiaries by virtue of relationships other than employment, such as, for example, consultancy and collaboration relationships, and who, in the performance of their specific duties, have access to Relevant Information and Inside Information;

(hereinafter, jointly, the **Addressees**).

- 3.2 Without prejudice to the provisions of paragraph 9 below, the Company shall enter into appropriate confidentiality agreements with any person, other than the Addressees, who has access to Relevant Information and Inside Information during particular circumstances.
- 3.3 The Information Referent, or any other person appointed by him/her within the internal structures of the Company or of the Subsidiaries, shall deliver a copy of this Procedure to the Addressees, together with the form in Annex B, respectively:
 - a) at the time of acceptance of their appointment, as regards to members of the management and control bodies of the Company and its Subsidiaries and the Information Referent;
 - b) at the time of recruitment, as regards to Employees; or
 - c) at the time of appointment, as regards to other Addressees.
- 3.4 In case of any amendment or supplement to this Procedure be made, the Information Referent, or any other person appointed by him/her within the internal structures of the Company or of the Subsidiaries, shall deliver a copy of the Procedure, as amended and/or supplemented, to the Addressees.
- 3.5 The Addressees who have received a copy of this Procedure and who are registered in the Register referred to in paragraph 12 below, are required to fill in, sign and return to the Information Referent the form contained in Annex C, in order to acknowledge their full knowledge and acceptance of this Procedure, it being understood however that the provisions of this Procedure are and shall be applicable to such persons regardless of the execution of the said form.
- 3.6 The Information Referent, together with the Company's internal structures, shall keep the forms filled in, signed and returned in accordance with paragraph 3.5 above.

4. ADDRESSEES OBLIGATIONS AND PROHIBITIONS

- 4.1 The Addressees are required to:
 - a) maintain any Relevant Information and Inside Information of which they become aware strictly confidential;
 - b) handle Relevant Information and Inside Information adopting all necessary caution so that the relative circulation be carried out without prejudice to the confidential nature of the information itself, until it is disclosed to the public according to the procedures provided for by this Procedure and the applicable regulations;
 - c) promptly inform the Chief Executive Officers and the Information Referent - in relation to the information they are responsible for - of any act, fact or omission that may at any time jeopardise the security of the Relevant Information and Inside Information.
- 4.2 By way of example and without limitation, herebelow is a set of general rules of conduct applicable to the Addressees:



- a) particular attention must be paid to the transmission to the members of the Board of Directors and/or Board of Statutory Auditors and/or members of any committees of the documentation preparatory to the relevant meetings, guaranteeing the confidentiality such documents;
- b) similar caution shall be used, in the context of extraordinary transactions, in the exchange of information and/or documentation with persons who act as external consultants or advisors of the Company or the Addressees;
- c) hard copies of any documentation containing Relevant Information and Inside Information or information that is in any case confidential must be kept in archives located in locked cupboards or drawers; the permanence of documents outside such archives must be limited to the period necessary for their use; documents that are not in use must be kept in the archives; the deposit of documents on tables and desks, especially if accessible to unauthorised persons, must be limited to the time strictly necessary;
- d) similar precautions are also observed in the event of travel and transfers. In particular, such documents must never be left unattended;
- e) suitable measures must be adopted to ensure that the opening and distribution of correspondence received by the postal and/or courier service is carried out in compliance with confidentiality criteria;
- f) the "confidential" nature of paper and/or electronic document must also be highlighted by adding the wording "confidential" or similar, using special envelopes or other closed containers for their circulation;
- g) the destruction of paper and/or electronic documents of a "confidential" nature must be carried out by the same persons who have access to such documents, using the most suitable methods to avoid any improper recovery of the relevant content;
- h) the sender of paper and/or electronic documents concerning Relevant Information or Inside Information, subject to the delay procedure, must highlight the strictly confidential nature of the document by adding the wording "STRICTLY CONFIDENTIAL";
- i) the Addressees are personally responsible for the preservation of the confidential documentation they come into possession and shall ensure that such documentation is kept in a suitable place to allow access only to authorised persons. In the event of loss of documents relating to Relevant Information or Inside Information, the concerned Addressees shall promptly inform the Information Referent, specifying the relevant conditions and circumstances, so that the latter can adopt any appropriate measures, including the publication of a press release.

4.3 Without prejudice to the provisions of Articles 184 *et seq.* of the TUF, and Articles 14 and 15 of the MAR, the Addressees, where in possession of Inside Information, are forbidden to:

- a) purchase, sell or in any case carry out transactions, directly or indirectly, on their own behalf or on behalf of third parties, on the Financial Instruments or Related Financial Instruments (including cancellations or modifications of orders, when the order was forwarded before the concerned person came into possession of the Inside Information), by making use of the Inside Information;
- b) recommending or inducing third parties, on the basis of Inside Information in their possession, to carry out any of the transactions under a);
- c) disclosing Inside Information to third parties, outside the normal exercise of their work, profession, function or office. Disclosing recommendations or inducements to third parties, as referred to in subparagraph b) above, is considered an unlawful communication of Inside



Information if the person disclosing the recommendation or inducement knows or should know that they are based on Inside Information;

- d) realising interviews to the press or statements containing Inside Information not yet disclosed to the market in accordance with this Procedure.

Article 9 of the MAR set forth a list of legitimate conducts which, if carried out, avoid the possibility of misuse of Inside Information.

5. ASSESSMENT OF INFORMATION

5.1 The assessment of any information concerning the Company or its Subsidiaries shall be conducted by the following persons:

- a) Information arising during internal bodies' meetings: the competence remains with the internal body, while the management of external communication will be carried out by the Chief Executive Officers, together with the Information Referent.
- b) Information arising during shareholders' meetings: the competence lies with the chairman of the meeting, while the management of the external communication will be carried out by the Chief Executive Officers, together with the Information Referent.
- c) Accounting and periodical data: the competence lies with the Chief Executive Officers together with the CFO of the Company.
- d) Information relating to a Subsidiary: the competence lies with the Chief Executive Officers together with the Chief Executive Officer of the Subsidiary to which the information refers and the Information Referent.
- e) Other information: the competence lies with the Chief Executive Officers together with the Information Referent.

5.2 Apart from the cases indicated in letters a) and b) of paragraph 5.1 above, in which external communication of Inside Information is simultaneous with the moment of its assessment by virtue of the collegial nature of the concerned internal bodies, the Addressees, in any other circumstances in which they come into possession of Relevant and/or Inside Information, are obliged to:

- a) promptly notify the Chief Executive Officers and the Information Referent of the content of the same;
- b) if the Relevant and/or Inside Information relates to protracted events or process, periodically inform the Chief Executive Officers and the Information Referent on the relative progress on a weekly basis or with the different frequency required by the nature of the event or process.

5.3 In the event that reasonable doubts exist as to the actual suitability of Inside Information to influence the prices of Financial Instruments - in the presence of the other elements characterising an information as Inside Information - the Chief Executive Officers, together with the Information Referent, must proceed without delay to disclose the Information to the public, in order to avoid any prejudice to the interests of investors and the market.

5.4 The Subsidiaries, and in particular the persons responsible by virtue of the internal organisation of each of them, are required to promptly inform the Chief Executive Officers and the Information Referent of the occurrence of any circumstances or event that constitutes or may constitute Relevant and/or Inside Information. The assessment of such information is in any case left to the Chief Executive Officers together with the Information Referent.

5.5 The Information Referent from time to time identifies, traces and monitors any Relevant Information that is not yet an Inside Information, in the manner deemed most appropriate, and promptly reports to the Chief Executive Officers when such Relevant Information, on the basis of a reasonable assessment,



presents the conditions and requirements to be qualified as Inside Information.

6. POSSIBLE EVENTS GENERATING INSIDE INFORMATION

6.1 By way of example and without limitations, the following is a list of the events that could qualify as Inside Information (if all the criteria set out in the respective definition in paragraph 2 above are met):

- a) entry into, or withdrawal from, business sectors;
- b) resignation or appointment of members of the administrative and control body;
- c) resignation of the audit firm;
- d) acquisition or disposal of shareholdings, other assets or business units;
- e) restructuring and reorganisation;
- f) capital transactions;
- g) issuance of warrants, financial instruments, bonds or other debt securities;
- h) transactions on financial instruments, buy-back and accelerated book-building;
- i) changes in the Financial Instruments' rights;
- j) losses such as to have a significant effect on shareholders' equity;
- k) revocation of bank credit lines;
- l) merger and demerger operations;
- m) conclusion, modification or termination of contracts or agreements relevant to the Company and/or Subsidiaries, and related businesses;
- n) performance of procedures relating to intangible assets such as inventions, patents or licences;
- o) patents, licenses, rights, etc;
- p) devaluation, revaluation of financial instruments in the portfolio;
- q) destruction or damage of uninsured business assets;
- r) insolvency of major debtors;
- s) purchase and sale of assets;
- t) performance of operations;
- u) litigation;
- v) changes in the Company's strategic personnel;
- w) own share transactions;
- x) changes in investment plans;
- y) changes in the expected accounting results (profit warning and earning surprise);
- z) submission of petitions or issuance of orders to submit to bankruptcy procedures;
- aa) request for admission to bankruptcy proceedings;
- bb) transactions with related parties (as defined in the regulation adopted by CONSOB with Resolution No. 17221 of 12 March 2010, as subsequently amended and supplemented, containing provisions on related parties' transactions);
- cc) issuance by the auditing firm of a qualified opinion, an adverse opinion or a declaration of the impossibility to express an opinion;
- dd) accounting situations intended to be reported in the annual financial statements, in the



consolidated financial statements and in the half-yearly financial statements, as well as the information and accounting situations when they are intended to be reported in the intermediate management reports, when these situations are communicated to external subjects, unless the external subjects are bound by confidentiality obligations and the communication is made in application of regulatory obligations, or as soon as they have acquired a sufficient degree of certainty; and

- ee) resolutions by which the board of directors approves the draft financial statements, the proposal for the allocation of the result for the year, the distribution of the dividend, the consolidated financial statements, the interim financial statements and the interim management statements.

7. MANAGEMENT AND DISCLOSURE OF INSIDE INFORMATION

- 7.1 When the information is assessed by the persons identified in paragraph 5.1 above as Inside Information, the same, where the conditions for triggering the delay procedure provided for in paragraph 8 below do not exist, must be disclosed, in accordance with this Procedure and the legal and regulatory provisions in force at the time, as soon as possible without delay and in a manner that allows rapid access and a complete, correct and timely assessment by the public.
- 7.2 The Chief Executive Officers, together with the Information Referent, shall therefore prepare a draft press release.
- 7.3 The press release, drafted in compliance with the applicable regulations, must in any case contain elements suitable to allow a complete and correct evaluation of the impact that the information provided may have on the price of the Financial Instruments and/or Related Financial Instruments and must not contain any promotional elements of the activities of the Company and/or Subsidiaries not inherent to the subject matter of the communication nor be drafted in the form of so-called strategic bundling, so as to combine positive elements with negative ones in order to mitigate the impact of the disclosure of Inside Information.
- 7.4 The notice referred to in paragraphs 7.2 and 7.3 above shall clearly indicate:
 - a) the inside nature of the information disclosed;
 - b) the identity of the issuer (full company name);
 - c) the identity of the notifier: name, surname, position within the issuer;
 - d) the subject matter of the Inside Information;
 - e) the date and time of disclosure to the public.
- 7.5 The notice must be composed of: *(i)* identification code of the information, *(ii)* title, *(iii)* summary, *(iv)* text and *(v)* corporate contacts, where:
 - a) the "title" contains an objective and concise description of the event or, where the release refers to more than one material event, of each event;
 - b) the "summary" summarises the characteristic elements of the event, also in the form of a table or list, so as to provide a non-misleading summary. The summary may be omitted if the title already contains an exhaustive description of the essential elements of the event;
 - c) the "text" must report in an articulate form the content of the news item, ensuring logical coherence to the exposition;
 - d) the "corporate contacts" contain the names of the persons or structures of the Company to be contacted to obtain further information, the relevant telephone numbers and e-mail addresses, as well as the Issuer's website.



- 7.6 Before being circulated to the public, the draft of the press release shall be sent to:
1. to the CFO of the Company, if the draft contains references to data concerning the economic, equity or financial situation of the Company and/or its Subsidiaries;
 2. to the Chief Executive Officer of a Subsidiary, if the press release relates to an event relating to that company; and
 3. where deemed appropriate by the Chief Executive Officers, to the Board of Directors.
- 7.7 If the press release refers to a transaction entered into, including through Subsidiaries, with a related party of the Company (identified pursuant to and for the purposes of the Procedure for transactions with related parties adopted by the Company, the **Related Parties Procedure**), said press release shall contain, in addition to the other information to be published pursuant to the foregoing, the following information:
- a) a description of the transaction;
 - b) the indication that the counterparty to the transaction is a related party of the Company and a description of the nature of the relationship;
 - c) the company name or the name of the counterparty to the transaction;
 - d) whether or not the transaction exceeds the materiality thresholds identified in Appendix 2 of the provisions on related parties issued by Borsa Italiana and an indication of whether or not an information document has been published subsequently pursuant to the Related Parties Procedure;
 - e) the procedure that has been or will be followed for the approval of the transaction and, in particular, whether a case of exclusion provided for by the Related Parties Procedure has occurred;
 - f) the possible approval of the transaction despite the contrary opinion of the Committee established pursuant to the Related Parties Procedure.
- 7.8 For the purpose of preparing the draft of the press release, the Chief Executive Officers, in agreement with the Information Referent, may at their own discretion prior consult with Borsa Italiana.
- 7.9 The Chief Executive Officers and the Information Referent shall ensure that the Inside Information disclosed is not misleading, false or deceptive and shall not omit anything that might affect the relevance of such information. In the event of significant changes to Inside Information already disclosed to the public, the Chief Executive Officers, in agreement with the Information Referent, shall promptly disclose the relevant information.
- 7.10 Inside Information shall be made available to the public by the Information Referent, or by the person appointed by the latter for this purpose, through SDIR. Such information must also be published on the Company's website, "Investor relations" section, and must be kept there for a period of no less than 5 (five) years from the date of publication.
- 7.11 The Company's website, on which Inside Information is published in accordance with paragraph 7.10 above:
- a) allows users to access the published Inside Information without discrimination and free of charge;
 - b) allows users to easily find Inside Information;
 - c) ensures that the published Inside Information clearly indicates the date and time of disclosure and is presented in chronological order.
- 7.12 Inside Information must not be published elsewhere before being communicated through SDIR; to this end, Inside Information must be managed by adopting all necessary precautions to ensure that the



relative circulation within the company context takes place without any prejudice to the Company and/or its Subsidiaries until such time as the same Inside Information is communicated to the public in compliance with the above.

- 7.13 In the event that Inside Information is to be disclosed on the open market, the Information Referent shall give Consob and Borsa Italiana advance notice by telephone of the disclosure of Inside Information, in order to allow them to assess any possible impact that such information, once disclosed, could have on the regular course of trading. In any case, the advance notice must be adequate, taking into account the subject matter of the disclosure and must be suitable to allow Consob and Borsa Italiana to assess, jointly with the Issuer, any appropriate interventions on the market.
- 7.14 Communication to the public of Inside Information relating to Subsidiaries is in any case the responsibility of the Company. The Subsidiaries must therefore refrain from independently disclosing their Inside Information to the public.
- 7.15 The Company is also obliged to inform the public of any significant change in the Inside Information already disclosed. In the presence of previously disclosed Inside Information, the press release shall be structured in such a way as to allow the market to assess the evolution over time of the set of circumstances or events constituting the subject matter of the release through adequate updates and links with previously disclosed Inside Information.
- 7.16 If Inside Information has been disclosed to the public in a manner that does not comply with this Procedure, the Company, through the Investor Relator, must disclose such information to the public simultaneously (on the same day), in case of intentional disclosure, and without delay (on the same day on which the Chief Executive Officers are informed of the disclosure) in case of unintentional disclosure.

8. DELAY IN DISCLOSURE OF INSIDE INFORMATION

- 8.1 The Company may decide to delay, under its own responsibility and in order not to prejudice its legitimate interests, the disclosure to the public of Inside Information provided that all the following conditions are met:
- a) immediate disclosure is likely to prejudice the legitimate interests of the Company; and
 - b) the delay in disclosure is not likely to mislead the public; and
 - c) the Company is able to ensure the confidentiality of such Inside Information.
- 8.2 In the case of a protracted process that occurs in stages and that is intended to bring about, or that results in, a particular circumstance or a particular event, the Company may on its own responsibility delay the public disclosure of inside information relating to this process, subject to points (a), (b) and (c) of the preceding paragraph. In order to assess whether there are legitimate conditions for triggering the delay in disclosing Inside Information to the market, the Company shall also take into account the relevant guidelines published by ESMA.
- 8.3 The responsibility for the decision to delay the disclosure of Inside Information and, therefore, to waive the obligation of immediate disclosure, lies with the Chief Executive Officer or - in case of his absence or impediment - with the Chairman of the Board of Directors or the Board of Directors of the Company, if the decision has been referred to this body by the Chief Executive Officer. In making the decision on delay, the opinion of the competent legal function must be obtained and both the impact of the exception on the correct information of the public and the degree of confidentiality that can be ensured to the Inside Information must be evaluated.
- 8.4 In the event of application of the delay procedure, the Information Referent shall adopt any measure that he/she deems appropriate, in the specific case and taking into account the type of Inside



Information as well as the electronic and/or paper format of the document in which it is contained, to ensure the secrecy of the delayed Inside Information and the maintenance of its confidentiality, also in order to avoid that persons who do not need to have access to the Inside Information in the normal exercise of their professional activity or function, i.e. persons who do not need to know the Inside Information, have access to it.

- 8.5 When the Company decides to consider authorising a delay, the Information Referent must prepare and keep a document containing at least the following elements:
- a) date and time (i) of the first existence of the Inside Information at the Issuer, (ii) of the decision to delay the disclosure of the Inside Information and (iii) of the time of likely disclosure of the Inside Information by the Issuer;
 - b) identity of the persons in the Company responsible for (i) taking the decision to delay disclosure and defining the duration of the delay, (ii) monitoring the conditions of the delay, (iii) taking the decision to disclose the Inside Information to the public and (iv) providing the Competent Authority with the required information on the delay and the relevant written explanation to be given to the same Authority;
 - c) evidence of the initial fulfilment of the conditions set out in paragraph 8.1 and of any changes in this regard that occurred during the period of delay, including (i) the measures established to protect the Inside Information subject to delayed disclosure, both externally and internally, and to prevent access to such information by unauthorised persons and (ii) the procedures put in place for immediate disclosure if the confidentiality of the Inside Information subject to delay is breached.

The Information Referent must also take care of any subsequent changes to the information contained in this document.

- 8.6 When the Company has delayed the disclosure of Inside Information, it must, immediately after such Inside Information has been disclosed to the public, notify such delay to CONSOB. The purpose of the notification is to provide the Competent Authority with the information subject of the delay, the reasons for the delay, the date and time at which the information became inside and any other circumstance that the Company deems relevant, in order to allow Consob to make a full assessment of the reported conduct, as well as to take appropriate supervisory measures in relation to the Financial Instruments in a timely manner. Notification to CONSOB is not required if, after the decision to delay publication, the information is not communicated to the public.
- 8.7 In all cases where the delay is authorised, the Information Referent must prepare a document - which must be kept by the Company on a durable support - containing at least the following information:
- a) identity of the Issuer and its company name;
 - b) date and time when the Inside Information originated;
 - c) identity of the notifying party: name, surname, position within the Issuer;
 - d) contact details of the notifier: e-mail address and professional telephone number;
 - e) identification of the Inside Information subject to delay (title of the disclosure announcement; reference number, if assigned by the system used for the disclosure of Inside Information; date and time of public disclosure);
 - f) date and time of the decision to delay disclosure of the Inside Information and the time at which the Issuer intends to end the delay;
 - g) identity of all persons responsible for the decision to delay disclosure of the Inside Information, of the persons who ensure monitoring of the permanence of the conditions permitting delay, of the persons responsible for notifying the delay to Consob (name, surname, position within



the Issuer); and

- h) evidence of compliance with regulatory obligations, *i.e.* the methods used to prevent unauthorised persons from having access to such Inside Information and the provisions put in place in the event that the confidentiality of such Inside Information is no longer guaranteed.

- 8.8 The notification must be sent to the Competent Authority by certified electronic mail to consob@pec.consob.it, indicating "Markets Division" ("*Divisione Mercati*") as the addressee and "MAR Delayed Communication" ("*MAR Ritardo comunicazione*") as the subject.
- 8.9 The Company is obliged to transmit, in the event of a subsequent request by CONSOB, an explanation of how the conditions justifying the delay in the public disclosure of Inside Information referred to in this paragraph are met.
- 8.10 If disclosure of Inside Information has been delayed in accordance with the applicable regulations and this paragraph, and the confidentiality of the Inside Information is no longer guaranteed or the reasons for the delay have ceased to exist, the Company shall disclose such Inside Information to the public as soon as possible. Similarly, if a rumour explicitly refers to Inside Information whose disclosure has been delayed pursuant to this paragraph 8, when such rumour is sufficiently accurate to indicate that the confidentiality of such information is no longer guaranteed, the Company shall disclose the Inside Information to the public as soon as possible.
- 8.11 When the Company or a person acting in its name or on its behalf discloses Inside Information to third parties in the normal exercise of their professional activity or function, the Company is obliged to make full or effective public disclosure of said Inside Information, at the same time in the case of an intentional disclosure and promptly in the case of a non-intentional disclosure. The aforesaid obligation shall not apply if the person receiving the Inside Information is bound by an obligation of confidentiality, regardless of whether such obligation is of a legislative, regulatory, statutory or contractual nature.
- 8.12 The delay may also apply with reference to the events and circumstances of the Company's Subsidiaries.
- 8.13 During the delay, the Issuer shall not disclose information that is inconsistent with that which is the subject of the delay.
- 8.14 The Information Referent shall ensure that suitable measures are in place to disclose Inside Information as soon as possible as soon as its confidentiality is no longer guaranteed (*e.g.* in the event of rumours that are sufficiently accurate to indicate that the confidentiality of the delayed Inside Information is no longer guaranteed).

9. RUMORS

- 9.1 With the aim of guaranteeing correctness and symmetry of information towards the public, the Information Referent, together with the Investor Relator, shall monitor the presence of any market rumours concerning news not disclosed by the Company, so that the Company may assess the need to issue a statement confirming the truthfulness of the news, supplementing or correcting its content where necessary, or denying it.

10. MEETINGS WITH THE PRESS AND FINANCIAL ANALYSTS

- 10.1 Relations with the press and other means of communication as well as with financial analysts and institutional investors are handled by the Chief Executive Officers and the Information Referent, with the support of the Company's Investor Relator.



- 10.2 The Chairman of the Board of Directors, Chief Executive Officers and persons authorised by them are authorised to release interviews to the press on behalf of the Company or its Subsidiaries.
- 10.3 In order to protect the equality of information between the various operators and without prejudice to the legislative and regulatory obligations in force, during meetings with the financial community, normally also open to members of the press, the Information Referent, with the support of the Investor Relator of the Company, shall ensure compliance with any disclosure obligations towards the Competent Authorities and Borsa Italiana. If, during interviews and/or meetings, an unintentional disclosure of Inside Information or forecast information occurs, the Chief Executive Officers and the Information Referent, with the support of the Company's Investor Relator, shall promptly communicate such information to the public.
- 10.4 In any case, all communication activities shall be conducted in accordance with the provisions of the Communication Policy adopted by the Company.

11. MARKET SURVEYS

- 11.1 The market survey is a communication of information to one or more potential investors prior to the announcement of a transaction, in order to assess the interest of potential investors in a possible transaction and its conditions, such as potential size or price, and may be carried out by an issuer. Market surveys impose a number of obligations on those conducting them, as they may involve the disclosure of Inside Information
- 11.2 The Board of Directors shall assess the survey to determine whether it will result in the disclosure of Inside Information.
- 11.3 The person receiving the market survey shall be notified in writing by the Information Referent, on the instructions of the Company's Board of Directors, of the prohibition to use such information or attempt to use it:
 - a) to acquire or dispose of the financial instruments to which such information relates, on its own behalf or on behalf of third parties, directly or indirectly;
 - b) by deletion or modification of an order already placed concerning a financial instrument to which such information relates.
- 11.4 The person receiving the survey shall notify the Information Referent in writing of his consent to receive Inside Information and of his obligation to keep it confidential.
- 11.5 The Information Referent, with the support of the Company's Investor Relator, shall ensure that a record is kept of the information exchanged in the context of a survey (orally, during meetings in person, by means of telephone communications, etc.). In case of recording of telephone communications or meetings the consent of the person receiving the information to the recording will be required.
- 11.6 Prior to conducting a survey, the Information Referent, with the support of the Company's Investor Relator, shall prepare the following documentation:
 - a) a document showing the identity of the persons receiving the survey, including legal entities and natural persons acting on behalf of the persons receiving the survey, the date and time of any communication made and the contact details of such persons;
 - b) a document setting out the information provided to the person receiving the market survey, including any subsequent amendments or additions. The document shall contain the minimum set of specific information required by the regulations, which shall differ according to whether the survey involves the disclosure of Inside Information or not.
- 11.7 The Information Referent, with the support of the Company's Investor Relator, shall also take care of the preparation of a document listing the identity of the persons who declare that they do not wish to



receive the survey.

- 11.8 The Information Referent, with the support of the Company's Investor Relator, shall keep copies of all the documentation produced and the following additional documentation for at least 5 (five) years after the survey:
- a) the consent of the person receiving the market survey to receive information and to keep it confidential;
 - b) the consent of the person receiving the market survey to record telephone calls/meetings;
 - c) all communications in the course of conducting the survey, including any recordings of telephone calls or audio or video meetings, correspondence and minutes, in the case of meetings signed by both parties.

SECTION 2

REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION

12. REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION

- 12.1 The Company establishes, in accordance with the law and regulations in force at the time, a register of persons who, by reason of their work or professional activity or by reason of the functions performed, have access to Inside Information (the **Register**), the keeping of which is the responsibility of the person appointed for this purpose (the **Appointed Person**).
- 12.2 The Register is managed by the Company also on behalf of its Subsidiaries, which must allow the Company to timely fulfil the obligations deriving from the application of this Procedure, identifying and communicating to the Company the persons to be entered into the Register.
- 12.3 The Company, through the Chief Executive Officers, may decide to make use of an external company to set up and maintain the Register, to which, therefore, it may entrust the task of Appointed Person.
- 12.4 The Register shall be kept in an electronic format that guarantees, at all time:
- a) that access to the Register is limited, in addition to the Appointed Person, only to the Information Referent and to the persons identified by the same, who must access it due to the nature of their respective functions;
 - b) the confidentiality and accuracy of the information contained therein;
 - c) the possibility of access to previous versions.

13. REGISTER'S FEATURES AND CONTENTS

- 13.1 Regulation 347, implementing the provisions of the MAR, establishes specific technical rules concerning the format of the sections of the Register, their features, content and updating.
- 13.2 In particular, persons who *(i)* have access on a regular or occasional basis to Inside Information, when *(ii)* such access occurs by reason of their work or professional activity or by reason of the functions performed on behalf of the party obliged to maintain the Register, must be entered in the Register.
- 13.3 With regard to requirement *(i)* above, it is specified that access to Inside Information is the circumstance that gives rise to the obligation to enter a person in the Register and the legitimacy of the entry itself, even if such access is only occasional.
- 13.4 The Register must be kept in electronic format, must comply with the model provided by Regulation



347 (Annex A) and must be structured in two distinct sections:

- a) one section for each Inside Information (with the effect that a new section must be created each time a new Inside Information or Relevant Information is identified/surfaced) which must contain the list and data of the persons who have access to the specific Inside Information (so-called **Occasional Section**);
- b) an additional section containing the details of the persons who have permanent access to all Inside Information (so-called **Permanent Section**).

13.5 The information to be reported in the Occasional Sections of the Register is:

- a) date and time of creation of the Occasional Section or when the Inside Information was identified;
- b) date and time of the last update of the Occasional Section;
- c) date of transmission to the Competent Authority;
- d) name and surname of the person who has access to the Inside Information. Where applicable, surname of birth of the person who has access (if different from surname);
- e) professional telephone numbers (fixed and mobile professional direct line)
- f) name and address of the company;
- g) function and reason for access to Inside Information;
- h) date and time at which the holder obtained access to the Inside Information;
- i) date and time at which the holder ceased to have access to the Inside Information;
- j) date of birth, national identification number (tax code or, for foreign countries, similar reference, where available);
- k) private telephone numbers (home and personal mobile);
- l) full private address (street, number, town, postcode, country).

13.6 The information to be reported in the Permanent Section of the Register is:

- a) date and time of creation of the Permanent Section;
- b) date and time of the last update of the Permanent Section;
- c) date of transmission to the Competent Authority;
- d) name and surname of the person who has access to the Inside Information. Where applicable, surname of birth of the person who has access (if different from surname)
- e) professional telephone number (fixed and mobile professional direct line);
- f) name and address of company;
- g) function and reason for access to Inside Information;
- h) date and time at which the holder was entered in the permanent access section;
- i) date of birth, national identification number (tax code or, for foreign countries, similar reference, where available);
- j) private telephone numbers (home and personal mobile);
- k) complete private address (street, number, town, postcode, country).

13.7 The Chief Executive Officers, in agreement with the Information Referent, shall identify, for the purposes of registration in the Permanent Section of the Register, and the relative communication to the Appointed Person, the persons who, by reason of their work or professional activity or the functions performed, have permanent access to Inside Information and the reasons for the relative registration.



The data of those who are registered in the Permanent Section are not included in the Occasional Sections. Such persons, who may be identified (by way of example only) as *(i)* Managing Directors and Executive Directors, *(ii)* General Manager, *(iii)* CFO and *(iv)* any other person identified in accordance with the foregoing, are obliged to communicate from time to time to the Appointed Person the names of their secretarial support staff and any other names of collaborators who are in a position to have access to Inside Information, for the purpose of including such persons in the Permanent Section of the Register.

- 13.8 The identification of the persons to be entered in the Occasional Sections of the Register, and the related communication to the Appointed Person, shall be carried out by the Chief Executive Officers in agreement with the Information Referent.
- 13.9 If the Company decides not to delay the publication of Inside Information, the persons who have had access to Inside Information in the period between the moment in which the information was qualified as Inside Information and the moment in which the information was published shall be indicated in the Register. This period of time must be as short as possible and limited to the technical time required to prepare the press release.
- 13.10 Pursuant to the applicable regulations, the Register must be updated without delay, adding the date of the update, in the following cases:
- change in the reasons for which a person is registered;
 - registration of new entities; and
 - the termination of access to Inside Information by persons registered (in the Permanent Section or in the Occasional Sections).
- 13.11 The update must also be ordered, for each registered person, in relation to his/her access to the various successive stages of development of the circumstances or event giving rise to the Inside Information.
- 13.12 The update must indicate the date and time when the change occurred that made the update necessary.
- 13.13 The Chief Executive Officers or the Information Referent shall inform the Appointed Person of the need to update the Register.
- 13.14 The Company and the Chief Executive Officers must promptly take all reasonable measures to ensure that all persons entered in the Register take note, in writing:
- of their entry in the Register, removal from the Register and updates to the information contained therein;
 - of the obligations deriving from having access to Inside Information and of the sanctions established in case of violation of the aforesaid obligations or in case of unauthorised disclosure of Inside Information.
- 13.15 Data relating to persons entered in the Register shall be kept for 5 (five) years after the circumstances that led to their entry or updating cease to exist.
- 13.16 Chief Executive Officers shall have the right to access the Register at any time.
- 13.17 The proper keeping and timely updating of the Register pursuant to this Procedure and the applicable provisions of laws and regulations is the responsibility of the Company notwithstanding the identification of the Appointed Person.

14. COMMUNICATIONS TO THE COMPETENT AUTHORITY

- 14.1 The Appointed Person shall promptly forward the Register or parts thereof to the Competent Authority whenever expressly requested to do so, to the following e-mail address: consob@pec.consob.it.



15. ADRESSEES OBLIGATIONS

- 15.1 The Addressees shall comply with the provisions contained in this Procedure.
- 15.2 The Addressees shall adopt appropriate measures to prevent access to Inside Information by persons other than those who need to access thereto to perform their assigned functions. In particular, the Addressees obtain, manage and store Inside Information only if necessary to perform the tasks assigned to them and for the time necessary, adopting the common rules of professional diligence in order to ensure strict confidentiality.

SECTION 3
COMMON PROVISIONS

16. DISCLOSURE OF THE PROCEDURE

- 16.1 This Procedure shall be brought to the attention of all Addressees by the Chief Executive Officers or the Information Referent, delivering a copy to all Addressees as well as to all persons entered in the Register at the time of their registration.
- 16.2 The Company shall ensure that the Subsidiaries, through the persons responsible for the relevant management by virtue of their internal organisation, take note of this Procedure and deliver a copy to their Relevant Persons and Employees.
- 16.3 Whenever the Procedure has been amended and/or supplemented, the Chief Executive Officers, the Information Referent or another person appointed by them within the internal structures of the Company or the Subsidiaries shall ensure that a copy of the Procedure, as amended and/or supplemented, is delivered to the Addressees.

17. BREACHES OF THE PROCEDURE AND PENALTIES

- 17.1 In the event of violation of the provisions of this Procedure, the Company and its Subsidiaries - each to the extent of their relative competence - will adopt any measures provided for by the relevant employment agreements (in the case of managers or employees) as well as the provisions of the Italian Civil Code.
- 17.2 Failure to comply with this Procedure may result, where the legal requirements exist, in the author of the violation being asked to pay compensation for all damages suffered by the Company and/or the Subsidiary as well as the adoption of the most suitable measures provided for and permitted by law.
- 17.3 Without prejudice to the provisions of the preceding paragraphs, the provisions of Articles 180 *et seq.* of the TUF, as well as the MAR and any provision of law or regulation in force at the time shall apply.

18. FINAL PROVISIONS

- 18.1 For all matters not expressly regulated in this Procedure, the legal and regulatory provisions applicable to the Company as an issuer of financial instruments listed on the MTA or on a different multilateral trading system shall apply.

19. ENTRY INTO FORCE



- 19.1 This Procedure, which was approved by the Board of Directors of Antares Vision on 22 February 2021, comes into force with effect from the date of commencement of trading of the Company's Financial Instruments on the MTA.
- 19.2 Any amendments that may become necessary or appropriate due to changes in the Company's organisational structure or in the laws and regulations applicable to issuers with securities listed on the MTA or on different multilateral trading systems, shall be approved by the Board of Directors of the Company upon the motivated proposal of the Chief Executive Officers.
- 19.3 The Information Referent shall provide for the written communication to all addressees of the Procedure of the amendments and/or integrations made to the Procedure itself.

20. NOTICES

20.1 Any communication pursuant to this Procedure shall be made in writing as follows:

- a) if addressed to the Company and/or to the Information Referent, to the attention of the latter by e-mail to the following address Investors@antaresvision.com, or by registered letter with advice of receipt to the following address:
- Antares Vision S.p.A.
Via del Ferro n. 16
25039 – Travagliato (BS)
- b) if addressed to the Addressees, to the addresses indicated by them in the acceptance form attached as Annex C to this Procedure;

or to the different addresses that shall be promptly communicated: (i) by the Information Referent to the Addressees; or (ii) by each of the latter to the Information Referent.

**ANNEX
A**

**Annex I to Implementing Regulation (EU)
2016/347**

TEMPLATE 1

List of persons with access to Inside Information – Section on [indicate contract-specific or event-related Inside Information] Date and time (of creation of this section of the list or when the Inside Information was identified): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)] Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)] Date of transmission to the Competent Authority: [yyyy-mm-dd]

Name of access holder	Surname of access holder	Surname of birth of access holder (if different)	Business telephone numbers (fixed and mobile business direct line)	Name and address of the company	Function and reason for access to Inside Information	Obtained (date and time the holder obtained access to Inside Information)	Terminated (date and time the holder ceased to have access to Inside Information)	Date of birth	National Identification Number (if applicable)	Private telephone numbers (home and personal mobile)	Full private address (street, house number, town, postcode, state)
[text]	[text]	[text]	[numbers (no spaces)]	[address of the Issuer/emissions market participant /auction platform/auction monitor/auction supervisor or third party of the access holder]	[description of role, function and reason for the presence in the Register]	[yyyy - mm - dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd]	[number and/or text]	[numbers (no spaces)]	[full private address of the access holder <ul style="list-style-type: none"> • street and house number • town • postcode • State]



TEMPLATE 2

Permanent access section of the list of persons having access to Inside Information Date and time (of creation of the permanent access section): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)] Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)] Date of transmission to the Competent Authority: [yyyy-mm-dd]

Name of access holder	Surname of access holder	Surname of birth of access holder (if different)	Business telephone numbers (fixed and mobile business direct line)	Name and address of the company	Function and reason for access to Inside Information	Entered (date and time the holder was entered in the permanent access section)	Date of birth	National Identification Number (if applicable)	Private telephone numbers (home and personal mobile)	Full private address (street, house number, town, postcode, state)
[text]	[text]	[text]	[numbers (no spaces)]	[address of the Issuer/emissions market participant /auction platform/auction monitor/auction supervisor or third party of the access holder]	[description of role, function and reason for the presence in the Register]	[yyyy - mm - dd, hh:mm UTC]	[yyyy-mm-dd]	[number and/or text]	[numbers (no spaces)]	[full private address of the access holder <ul style="list-style-type: none">• street and house number• town• postcode• State]



ANNEX B

Schedule 1 – Letter of entry in the register of persons having access to Inside Information (Communication to be sent to the Addressees)

Dear

in compliance with the applicable regulatory provisions, as reflected in the "Procedure for the handling of Inside Information and for the establishment and maintenance of the Register of persons with access to Inside Information" of Antares Vision S.p.A. (the **Procedure**, available on the website www.antaresvision.com), we inform you that your personal data have been included in the register of persons having access to Inside Information of Antares Vision S.p.A. in the permanent/occasional section, for the following reason:

We remind you that: (a) persons in possession of Inside Information (as defined in the Procedure) shall comply with the provisions of the Procedure; (b) failure to comply with the applicable provisions of law concerning Inside Information may result in criminal or administrative offences (including, in particular, the provisions of Articles 184 and following of Legislative Decree No. 58/1998) and may result in situations entailing the administrative liability of the Company (pursuant to Legislative Decree No. 231/2001).

We remind you that all communications made by you pursuant to the Procedure shall be addressed to the attention of the Information Referent and sent (i) by e-mail to investors@antaresvision.com, or (ii) by registered letter with advice of receipt to Antares Vision S.p.A., Via del Ferro n. 16, 25039, Travagliato (BS).

.....

(place) (date)

The Information Referent of Antares Vision S.p.A.

Information pursuant to Article 13 of the European Regulation No. 679/2016

Pursuant to Article 13 of the European Regulation No. 679/2016 - General Data Protection Regulation (the **Regulation**), Antares Vision S.p.A., with registered office in Travagliato (BS), Via del Ferro No. 16, 25039, VAT No./Fiscal Code No. 02890871201 (the **Company**), as data controller, provides the following information relating to the processing of personal data to the person to whom such personal data refer.

a) Collected personal data, purpose and legal basis

The personal data concerning the person concerned, collected and processed by the Company, are those entered in the register of persons having access to inside information of the Company and, more precisely, surname, name, tax code, date of birth, private address, company, telephone contact, fax number and e-mail address.

Personal data shall be collected and processed exclusively for the purpose of the management of inside information by the Company, as well as the establishment and maintenance of the relevant register.

The legal basis of the processing for the aforementioned purposes is the fulfilment of the legal obligations respectively contained in the TUF, Consob Regulation adopted by resolution No. 11971 of 1999, Regulation No. 596/2014 and its Implementing Regulation No. 347/2016, in accordance with the requirements of Article 6(1)(c) of the Regulation.

The data processing is carried out in paper and/or electronic form, in compliance with the principles established by the Regulation and in such a way as to protect the confidentiality of the data of the person concerned and his/her rights.

b) Compulsory or optional nature of providing data

The provision of the personal data requested, for the purposes and methods of processing as specified above, is mandatory as it is necessary for the management of Inside Information by the Company, as well as the establishment and maintenance of the relevant register.

c) Consequences of a possible refusal

Failure to disclose personal data, or the partial disclosure of such data, will make it impossible for the Company to fulfil its obligations under applicable law and, more specifically, to manage Inside Information, as well as the consequent establishment and maintenance of the relevant register.

d) Persons to whom personal data may be communicated or who may become aware of them

- The personal data collected may be communicated to the supervisory authorities (e.g. CONSOB) and to other public authorities that request it, within the limits strictly pertinent to the obligations and purposes referred to in point a), in relation to the fulfilment of legal and/or regulatory obligations (bearing in mind that the Company is listed on a regulated market and therefore subject to additional obligations and information requirements), as well as to the external company that the Company may decide to entrust for the establishment and maintenance of the register. Personal data may be disclosed only within the limits and in relation to any obligations established by law and/or regulations.
- The employees and consultants of the data controller, responsible for supervising and/or carrying out the formalities inherent to the purposes referred to in point a), may become aware of the personal data collected.



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e) Transfer of personal data and data retention period

Personal data will be stored within the European Union. No transfer of personal data outside the European Union is foreseen.

Your personal data will be kept for as long as necessary to fulfil the legal obligations referred to in point a) above, *i.e.* for a maximum period of 5 (five) years after the circumstances that led to your registration or updating no longer exist.

f) The rights of the person concerned

At any time, the person concerned may exercise his/her rights against the data controller, pursuant to Articles 15, 16, 17, 18, 20 and 21 of the Regulation, *i.e.* the right to access his/her data, to request its modification or deletion, to restrict its processing or to object to its processing, as well as the right to data portability.

In order to exercise your rights, you may send a request to the Company by registered letter to the address Via del Ferro n. 16, 25039, Travagliato (BS), or by e-mail to the dedicated e-mail address privacy@antaresvision.com, to the attention of the legal department of Antares Vision S.p.A..

The person concerned has also the right to apply to the *Garante per la protezione dei dati personali* (Piazza Venezia No. 11, 00187, Roma) in order to enforce his rights in relation to the processing of his personal data.



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Schedule 2 – Letter updating the data entered in the register of persons with access to Inside Information

Dear,

in compliance with the applicable regulatory provisions, as reflected in the "Procedure for the handling of Inside Information and for the establishment and maintenance of the Register of persons with access to Inside Information" of Antares Vision S.p.A. (the **Procedure**, available on the website www.antaresvision.com), we inform you that on we have updated your personal data subject to processing (surname, name, tax code, company, reason for registration in the register of persons having access to Inside Information) for the following reason

We remind you that all communications made by you pursuant to the Procedure shall be addressed to the attention of the Information Referent and sent (i) by e-mail to investors@antaresvision.com or (ii) by registered letter with advice of receipt to Antares Vision S.p.A., Via del Ferro n. 16, 25039, Travagliato (BS).

.....,

(place) (date)

The Information Referent of Antares Vision S.p.A.



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Schedule 3 – Letter of removal from the register of persons having access to Inside Information

Dear,

in compliance with the applicable regulatory provisions, as reflected in the "Procedure for the handling of Inside Information and for the establishment and maintenance of the Register of persons with access to Inside Information" of Antares Vision S.p.A. (the **Procedure**, available on the website www.antaresvision.com), we inform you that on the reason for your registration in the register of persons having access to Inside Information ceased to exist. Therefore, your personal data being processed (surname, name, tax code, company to which you belong, reason for inclusion in the register of persons with access to Inside Information will be deleted in accordance with the Procedure.

We remind you that all communications made by you pursuant to the Procedure shall be addressed to the attention of the Information Referent and sent (i) by e-mail to the address investors@antaresvision.com, or (ii) by registered letter with advice of receipt to the address Antares Vision S.p.A., Via del Ferro n. 16, 25039, Travagliato (BS).

.....,

(place) (date)

The Information Referent of Antares Vision S.p.A.

For acceptance and acknowledgement,

....., there.....

(place) (date)



ANNEX C

Acknowledgement and acceptance by the Addressee

I, the undersigned,, in my capacity as

- acknowledge that I have been included in the register of persons having access to Inside Information of Antares Vision S.p.A., in the occasional/permanent section;
- certified that I have received a copy of the " Procedure for the handling of Inside Information and for the establishment and maintenance of the Register of persons with access to Inside Information " of Antares Vision S.p.A. (the **Procedure**) and that I have read and understood its provisions;
- aware of the obligations imposed on me by the Procedure and by the applicable regulatory provisions (including the provisions of Articles 184 *et seq.* of Legislative Decree No. 58/1998);

all the foregoing:

- (a) I hereby declare that I know and accept the provisions of the Procedure and that I undertake with the utmost diligence, to the extent of my competence, to comply with them;
- (b) I indicate the following personal contact details:

- telephone number:
- fax number:
- e-mail address: