INTERNAL DEALING PROCEDURE OF KALEON S.P.A.

Procedure relating to the identification of relevant persons and their closely associated persons, to the communication of transactions carried out by them, including through third parties, concerning shares issued by Kaleon S.p.A. pursuant to the Euronext Growth Milan Regulations adopted by Borsa Italiana S.p.A. ("**Borsa Italiana**") on March 1, 2012, as amended and supplemented (the "**EGM Issuers Regulation**"), and Regulation (EU) 596/2014.

Document approved by the Board of Directors of Kaleon S.p.A. on October 31st, 2025

This procedure (the **Procedure**) defines the rules for the performance by the Managers and the Persons Closely Related to them (all as defined below), as well as by Kaleon S.p.A. (**Kaleon** or the **Company**), as specified below, of the obligations to inform the Company, Consob and the market about Relevant Operations (as defined below) carried out by the aforesaid persons, also through third parties, concerning financial instruments issued by Kaleon or other financial instruments connected to them.

The legal and regulatory framework of the aforementioned disclosure obligations (the **Discipline**) is contained in Article 19 of Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014 (the **MAR Regulation**), as novated by Regulation (EU) 2115/2019 of the European Parliament and of the Council of 29 November 2019 (the **2115/2019 Regulation**), in Delegated Regulation (EU) 2016/522 of the Commission of 17 December 2015 (the **Delegated Regulation (EU) 2016/522**) and in Implementing Regulation (EU) 2016/523 of the Commission of 10 March 2016 (the **Implementing Regulation (EU) 2016/523**).

The Procedure comes into force as of the date of admission to trading of the Company's financial instruments on Euronext Growth Milan, a multilateral trading system organized and managed by Borsa Italiana (**EGM**).

The Chief Executive Officer of the Company has been authorized on October 31, 2025, to make any amendments and additions to this Procedure that may be required as a result of legal or regulatory provisions or any amendments and additions requested by Borsa Italiana S.p.A., also following the integration or amendment of the applicable pro tempore regulations.

For anything not expressly provided for in this Procedure, reference is made to the relevant provisions of the applicable legal and regulatory provisions.

Article 1 - Definitions

1. In addition to the terms defined elsewhere in this Procedure, the following terms shall have the meanings ascribed to them herein:

   Board of Directors: the board of directors of the Company from time to time in charge.

   Board of Statutory Auditors: the board of statutory auditors of the Company from time to time in charge.

   Chairman: indicates the chairman of the Board of Directors of the Company.

   Chief Executive Officer: means any director with management authority over the Company.

   Delegated Bodies: each director of the Company holding management powers.

   Derivatives: means any financial instrument as defined in Article 4(1)(44)(c) of Directive 2014/65/EU and referred to in Annex I, Section C, points 4 to 10 of that Directive.

   EG Advisor: means the Euronext Growth Advisor appointed by the Company.

   Execution Date: means the day on which:

   (a) the contract for the purchase, sale, exchange or loan of securities or carry-over that is the subject of the Relevant Transaction has been executed;

   (b) the payment of the consideration in case of acceptance of public offers of purchase, sale or exchange of Shares is carried out;

   (c) the allocation of Financial Instruments (as defined below) due following the exercise of those, including unlisted ones, which grant the right to subscribe, purchase or sell Shares, as well as the exercise of the conversion right connected with convertible bonds, including cum warrants, has been carried out;

   (d) the assignment of Financial Instruments was carried out following the execution of capital transactions.

   Financial Instruments: collectively the financial instruments of the Company admitted to trading on an MTF, as defined in Article 4(1)(15) of Directive 2014/65/EU, including the Shares.

   Group: means the Company and its Subsidiaries, if any.

   Issuers' Regulations: means the CONSOB Issuers' Regulations adopted with Resolution no. 11971 of 14 May 1999.

   Investor Relations Manager: indicates the head of the Company's investor relations department.

   Manager: pursuant to art. 3, paragraph 1, points 25) of the MAR Regulation:

   (a) a member of the administrative, management or supervisory body of that entity;

   (b) a senior executive who is not a member of the bodies referred to in point (a), who has regular access to Price Sensitive Information relating directly or indirectly to that entity and power to take managerial decisions affecting the future developments and business prospects of that entity.

Manager Transactions: all transactions carried out by, or on behalf of, Managers and/or Persons Closely Associated with Managers concerning the Kaleon Shares, Derivative Instruments or other Financial Instruments Related thereto, as identified above by the Framework (including the transactions provided for in Article 19(7) of the MAR Regulation and Article 10 of Delegated Regulation (EU) 2016/522 as amended and supplemented from time to time), and in particular:

(a) any sale or purchase or any agreement to sell or purchase such Financial Instruments, Derivative Financial Instruments or Related Financial Instruments;

(b) the grant or acceptance by such person of any option with respect to such Financial Instruments, Derivative Financial Instruments or Connected Financial Instruments or with respect to any other present or future, conditional or unconditional right or obligation to acquire or dispose of such Financial Instruments, Derivative Financial Instruments or Connected Financial Instruments;

(c) the purchase, sale, exercise or non-exercise of, or any disposition of, any such options, rights or obligations with respect to such Financial Instruments, Derivative Financial Instruments or Linked Financial Instruments;

(d) off-market transactions;

(e) gratuitous transfers;

(f) the purchase, sale or waiver (in whole or in part) of a Financial Product Related to the performance of Financial Instruments of the Company in which the holder is a director or a family member of the director;

(g) the additional transactions indicated in Article 10 of Council Regulation 522/2016/EU,

with the exclusion of transactions whose aggregate amount does not reach €20,000 (twenty thousand) by the end of the year (the **Relevant Amount**), or such other amount as may be determined from time to time by the Discipline.

The Relevant Amount is calculated by summing without compensation all Relevant Operations carried out on behalf of each Manager and Relevant Person and those carried out on behalf of the Persons Closely Associated with them.

For Derivative Financial Instruments, the amount is calculated with reference to the underlying Financial Instruments.

Persons Closely Associated with Managers: within the meaning of Article 3(1)(26) of Regulation (EU) 596/2014, one of the following persons:

(a) a spouse, or a partner considered to be equivalent to a spouse in accordance with Italian law;

(b) a dependent child, in accordance with national law;

(c) a relative who has shared the same household for at least one year on the date of the

Manager Transaction; or

(d) a legal person, trust or partnership, the managerial responsibilities of which are held by a Manager or by a person referred to in point (a), (b) or (c), which is directly or indirectly controlled by such a person, or which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person.

Person Responsible: the CFO or the other person identified by the Board of Directors of the Company as responsible for receiving, managing and disclosing to the market information on Manager Transaction.

Price Sensitive Information: pursuant to Article 7(1)(a) of Regulation (EU) 596/2014, means information of a precise nature, which has not been made public, concerning, directly or indirectly, the Company or one of its Subsidiaries or one or more Financial Instruments of the Company, and which, if made public, could have a significant effect on the prices of such Financial Instruments.

For purposes of this definition:

– a piece of information is of a "*precise nature*" if:

  (a) relates to a set of circumstances that exists or may reasonably be expected to come into existence or an event that has occurred or may reasonably be expected to occur; and

  (b) it is sufficiently specific to allow conclusions to be drawn as to the possible effect of the set of circumstances or event referred to in (a) on the prices of the Financial Instruments or related Derivative Financial Instruments (as defined below).

  In this regard, in the case of a prolonged process that is intended to materialize, or that determines, a particular circumstance or event, such future circumstance or future event, as well as the intermediate steps of said process that are related to the materialization or determination of the future circumstance or event, may be considered as information of a precise nature. It should be noted that an intermediate step in a prolonged process is considered Price Sensitive Information if it meets the criteria set out in this definition of "price sensitive information";

– "*information which, if made public, could have a significant effect on the prices of Financial Instruments*" means information which, presumably, a reasonable investor would use as one of the elements on which to base his or her investment decisions.

Related Financial Instruments: the financial instruments identified in this regard by the Regulations and any financial product the value of which is determined in whole or in part directly or indirectly in relation to the price of a Financial Instrument (including derivatives).

SDIR: the "Service for the disclosure of regulated information" pursuant to CONSOB regulations.

Shares: the ordinary shares of the Company admitted to trading on EGM.

Subsidiary: means the companies controlled by the Company pursuant to art. 2359 of the Civil Code.

TUF: indicates the Legislative Decree no. 58 of 24 February 1998 (Consolidated Law on Financial Intermediation).

Article 2 - Communication of the Procedure to Managers

1. The Delegated Bodies identify by name the Managers of whom they are aware, verifying at least once a year the need to add to this list, and communicate this list to the Board of Directors of the Company.
2. Upon receipt of this Procedure, each Manager shall sign a declaration, in compliance with the model contained in Annex B attached to this Procedure, acknowledging and accepting this Procedure and shall promptly send such declaration to the Investor Relations Manager.
3. Managers shall notify, in writing, the Persons Closely Associated with Managers - to whom the provisions set forth herein are also applicable - of the obligations set forth in this Procedure and shall keep a copy of the notification, also sending it to the Investor Relations Manager.

Article 3 - Transactions subject to reporting requirements

1. All Transactions in Shares, debt securities, Derivative Financial Instruments or Connected Financial Instruments carried out by Managers and/or Persons Closely Associated with Managers are subject to disclosure.

2. Transactions on Financial Instruments, on Derivative Financial Instruments or on Connected Financial Instruments carried out by Managers and/or by the Persons Closely Associated with Managers whose total amount, by the end of each calendar year, has not reached 20,000 (twenty thousand) euros (or the different amount identified by the competent authority pursuant to article 19, paragraph 9 of the MAR) are not subject to the disclosure obligations set out in this procedure. Consequently, if the amount of 20,000 (twenty thousand/00) euros is exceeded during the calendar year, the Transaction that led to the reaching of the aforementioned threshold must be communicated, as well as all subsequent Transactions. Furthermore, the amount in question must be calculated by summing without compensation the countervalue of the Transactions (adding positive and negative transactions) relating to Financial Instruments, Derivative Financial Instruments or Connected Financial Instruments, carried out by or on behalf of each Relevant Person and/or by a Person Closely Associated with the Relevant Person since the beginning of the calendar year. For Derivative Financial Instruments, the amount is calculated by reference to the Financial Instruments.

3. When calculating the amount of the countervalue relating to Transactions carried out in a currency other than the Euro or in which the value of the asset underlying the Financial Instrument involved in the Transaction is expressed in a currency other than the Euro, it is also necessary to consider the daily reference exchange rate available on the European Central Bank's website to determine whether the threshold of Euro 20,000 has been exceeded.

Article 4 - Reporting obligations to Consob and Kaleon

1. Pursuant to the Discipline, Managers and Persons Closely Associated with Managers are obliged to notify Consob of Manager Transactions carried out by themselves or on their behalf **within and no later than 3 (three) working days** from the Date of Execution of such transactions (excluding Saturdays, Sundays and any other holiday).

2. Managers and the Persons Closely Associated with Managers are required to notify the Company of the Manager Transaction referred to in art. 4.1 **within 3 (three) working days** from the Execution Date at the following e-mail address: investorrelations@kaleon.com, so that the Company may publish them, by means of SDIR and publication on its website, promptly and in any case **no later than 2 (two) working days** from the notification of the operation (excluding Saturdays, Sundays and any other holiday).

3. The information notified to the Company pursuant to Article 4.2 above shall be transmitted to the Investor Relations Manager at the Company's certified e-mail address. The Investor Relations Manager, once such information has been received from the Relevant Person, shall be responsible for its management and dissemination to the market.

4. The Investor Relations Manager shall prepare the communication to be sent to the public referred to in Article 3.2 above. The Investor Relations Manager shall arrange for the aforesaid communication to be made public via SDIR, no later than the deadline referred to in article 4.2 above, as the case may be. A copy of this communication must also be published on the Company's website in the "investor relations" section. The text of the communication must be submitted to the Chief Executive Officer or the Chairman of the Board of Directors for final approval before being sent via SDIR.

5. Transactions entered into by Managers shall not be published elsewhere prior to being communicated via SDIR.

6. The communications to Consob referred to in art. 4.1 above shall be made by Kaleon, on behalf of the Manager and/or the Persons Closely Associated with the Managers if the Manager has - also on behalf of the aforesaid Persons Closely Associated with the Manager - given a specific mandate to Kaleon, pursuant to the provisions of art. 5 below.

7. Managers:

    (i) acquire from the Persons Closely Associated with them the information necessary for the fulfilment of the communication obligations provided for by articles 3.1 and 3.2 above, if the latter do not do so directly;

    (ii) notify in writing the respective Closely Associated Persons of their obligations under the Discipline and keep a copy of the notification made;

(iii) acquire from the Closely Related Persons the data necessary for inclusion in the list of Managers and their Closely Related Persons, kept by the Company pursuant to art. 8.1.c) below.

Communications regarding such Transactions must not be misleading, false or deceptive and must not omit anything that might affect the relevance of such information.

Article 5 - Methods of communication to Consob and disclosure to the public

1. If they do not avail themselves of the option set forth in art. 6 below, Managers and Persons Closely Associated with Managers shall make the notifications set forth in art. 4.1., by transmitting to Consob the notification and communication model provided for in the annex to the Implementing Regulation (EU) 2016/523 shown in Annex A to this Procedure.

Article 6 - Assignment to Kaleon for the forwarding of notifications of Relevant Operations to Consob

1. The Managers - also on behalf of the Persons Closely Associated with them, if authorized by them - may mandate Kaleon (the **Assignment**) to carry out on behalf of the Managers and, if necessary, of the Persons Closely Associated with the Managers, the communications to Consob of the Manager Transactions, within the terms provided for therein.

2. The Assignment is conferred to Kaleon by signing Section II of the Form attached to this Procedure and shown in Annex B.

3. The Managers who have given the assignment to Kaleon shall inform the Chairman and the Person Responsible of every Manager Transaction that has reached the Relevant Amount, carried out by themselves or by their Closely Associated Persons **within 1 (one) working day** starting from the Execution Date.

4. The communication to Kaleon referred to in Article 4.2 above shall be made by the Manager by sending to the President and the Person Responsible at the certified e-mail address of the Company the form set out in Annex A to this Procedure, correctly filled in, by e-mail and subject to telephone notice. The Chairman and/or the Person Responsible shall immediately acknowledge receipt of the communication by e-mail to the address that the Manager shall indicate.

5. The Chairman or the Person Responsible shall notify Consob on behalf of the Manager and/or the Persons Closely Associated with the Manager, pursuant to the Discipline[1], of the transactions notified by the aforementioned persons within and no later than 3 (three) working days from the Execution Date of the transactions in question.

[1] Via PEC at consob@pec.consob.it (if the sender is subject to the obligation to have PEC) or via e-mail at protocollo@consob.it. Specify as addressee "Market Information Office" and indicate at the beginning of the subject line "MAR Internal Dealing" (see Consob Communication no. 0061330 of 1.7.2016)

6. Without prejudice to the applicable provisions of law and to the provisions of art. 8 below, Kaleon shall not be liable for incorrect and/or incomplete and/or untimely disclosure of Manager Transaction by the Manager and/or the Persons Closely Associated with them.

7. In any hypothesis of direct responsibility of the Manager and/or the Persons Closely Associated with them, Kaleon reserves the right to proceed against them for compensation of any damage suffered or being suffered.

Article 7 - Restrictions on the execution of transactions by Managers and Associated Persons ("black-out periods")

1. Pursuant to Article 19, paragraph 11, of the MAR Regulations, Managers are prohibited from effecting, on their own behalf or on behalf of third parties, directly or indirectly, transactions in Kaleon Financial Instruments and Financial Instruments Related to them during the 30 (thirty) calendar days preceding the announcement[2] of an interim or year-end financial report that the Company is required to make public pursuant to the statutory and regulatory provisions in force from time to time (the **Black-out period**).

2. If the Company publishes preliminary data, the Black-out period shall apply only with respect to the date of publication of such preliminary data (and not with respect to the final data), provided that the preliminary data contains all key information that should be included in the final results.

3. The prohibition does not apply: (i) in the case of exceptional situations of subjective necessity, to be assessed on a case-by-case basis, such as, by way of example, serious financial difficulties that require the immediate sale of shares; (ii) due to the characteristics of the trading in the case of transactions conducted at the same time as or in connection with any employee shareholding plans or a savings program, a guarantee or rights to shares, or even transactions in which the beneficial interest of the security in question is not subject to change; as well as (iii) in the additional circumstances and conditions set forth in art. 9 of Delegated Regulation (EU) 2016/522.

4. In addition to the provisions of Article 7.1 above, the Board of Directors, by means of a specific resolution, may establish additional periods in which some or all of the Managers are prohibited or restricted from carrying out all or some of the transactions referred to in paragraph 1 above, for the period of time deemed necessary, subject to notification of the start and end date of the period in question to the persons referred to above.

5. The Manager concerned must adequately justify the operation in writing to the Company, describing its nature and the exceptional nature of the circumstances as well as demonstrating that the specific operation cannot be carried out at any other time except during the Black-out period.

6. Circumstances shall be considered exceptional if they are extremely urgent, unforeseen and

[2] The day of the announcement represents the 30th day of the Black-out period.

compelling situations that are beyond the Manager's control.

7. In considering whether the circumstances described in the written request are exceptional, the Board of Directors shall consider, in addition to other indicators, whether and to what extent the Manager:
    i. at the time the request is made, must perform a legally enforceable financial obligation or satisfy a claim;
    ii. must fulfill or is in a situation created prior to the commencement of the Black-out period that requires the payment of an amount to a third party, including tax obligations, and such person cannot reasonably fulfill a financial obligation or satisfy a claim other than by immediately selling the Company's Financial Instruments.

Article 8 - Information-Accession

1. The Person Responsible shall:

    (a) notify the Managers of their submission to the obligations covered by the Procedure;

    (b) inform each Manager in writing of the contents of the Procedure so that each of them can:

        i. expressly confirm that he/she has read and acquired full knowledge of the Procedure, by signing Section I of the Form in **Annex B**;

        ii. formalize the possible conferment of the Assignment by signing Section II of the Form in **Annex B**;

        iii. notify in writing the Persons Closely Associated with them of the existence of the conditions on the basis of which these persons are required to comply with the disclosure obligations set out in the Discipline;

        iv. consent to the processing of personal data in accordance with current privacy legislation, where applicable;

    (c) draw up and update the list of names of the Managers and the Persons Closely Associated with them and to keep the declarations of knowledge and acceptance of the Managers, as well as a record of all communications received and made to the market and to Consob.

2. The Procedure is applicable to Managers even if they have not returned to the Person Responsible the communication of acknowledgement and acceptance referred to in art. 8.1(b) above.

Article 9 - Sanctions

1. Failure by Managers to comply with the provisions of the Procedure which may result in non-

compliance by the Company with the applicable provisions, including regulatory provisions, may result in the application to the Company of the sanctions set out in the MAR Regulation and the TUF, as well as those of the additional legal and regulatory provisions in force from time to time.

2. Abuse of Price Sensitive Information and market manipulation constitute criminal offences and may give rise to administrative liability for the Company pursuant to art. 187-quinquies of the TUF and art. 25-sexies of Legislative Decree 231/2001.

3. Should the Company or a Subsidiary incur pecuniary sanctions for violation of the provisions on corporate disclosure resulting from non-compliance with the principles set out in the Procedure or in the applicable laws or regulations, the Company shall also take action to recover from those responsible for such violations, in order to obtain reimbursement of the charges relating to the payment of said sanctions.

4. Violation of the provisions of the Procedure, even where it does not result in conduct sanctioned by the competent judicial and/or supervisory authorities, may cause serious damage to the Company, also in terms of its image, with significant economic and financial consequences, and will constitute grounds for termination of the existing relationship for good cause. The violation, therefore, implies the possibility for the Company to claim compensation from the author for the damages suffered by the same or suffered by the Group.

5. If the violation has been committed by a director of the Company, he/she will not be able to take part in the deliberation on sanctions. If the majority of the Board of Directors took part in the violation, the body competent to take the appropriate measures will be the Board of Auditors.

6. If the violation has been committed by a Manager who is also an employee, this may constitute a disciplinary offence and, in the most serious cases, may result in dismissal.

Article 10 – Amendments and additions

1. The Chairman of the Board of Directors and/or the Chief Executive Officer have been authorized to make such amendments and additions to this Procedure as may be necessary as a result of provisions of law or regulations, with subsequent ratification of the amendments by the Board of Director.

2. The Person Responsible shall promptly notify the Managers in writing of the amendments and/or additions to this Procedure and shall obtain their acceptance of the new contents of the same in the manner set out in art. 8 above. The communication shall also indicate the date of entry into force of the new or amended provisions.

Article 11 – Processing of personal data

1. For the purposes set forth in the Procedure, the Company may be required to process certain personal data of the Persons Closely Associated with Manager.

2. The personal data of which the Company becomes aware as a result of the communications received shall be processed in application of this Procedure, also through third parties, for the sole purpose of complying with the regulations on Internal Dealing.

3. The Persons Closely Associated with the Managers are, therefore, required by virtue of the provisions of law and regulations illustrated, to provide personal data and information that the Company, also in its role as data controller, will process for the purposes and methods better described in the information pursuant to Article 13 of EU Regulation 679/2016 on the protection of personal data ("GDPR") and by the emanating provisions of law on the subject. The legal basis for the processing of personal data in question is based both on a legal obligation and on the assessment, conducted by the Company, as data controller, of the existence of a legitimate interest aimed at safeguarding the market to the prevention of fraud, pursuant to and in accordance with the GDPR and subsequent amendments or additions.

4. By signing Annex B by the Persons Closely Associated with the Managers, the Managers declare that they have read and understood everything concerning the processing of their personal data. Any refusal to provide the requested data would make it impossible for the Company to comply with the obligations provided for by the regulations on Internal Dealing and may justify the payment of the sanctions provided for.

Article 12 – Final Provisions

1. This Procedure shall enter into force as from the date of admission to trading of the Company's financial instruments on EGM, the multilateral trading system organized and managed by Borsa Italiana.

2. The Procedure shall be delivered to all Managers, who shall be required to (i) return a signed copy of this Procedure for receipt and acceptance; (ii) comply with the provisions contained in this Procedure; and (iii) contact the Investor Relations Manager in case of need for clarification on the application of the Procedure.

* * * *

Annexes:

Annex A: Template to be used for disclosure by Managers and Persons Closely Associated with Managers of Manager Transactions and related instructions for completion (Annex to Regulation 2016/523)

Annex B: Form for the declaration of acknowledgement and full knowledge of the Procedure and the possible assignment of the Assignment pursuant to art. 5 of the Procedure

ANNEX A (MANAGER)

TEMPLATE FOR NOTIFICATION AND PUBLIC DISCLOSURE OF TRANSACTIONS SET OUT IN THE ANNEX TO IMPLEMENTING REGULATION (UE) 2016/523

1.	**Details of the person discharging managerial responsibilities / person closely associated**	
a)	Name	[For natural persons: first name and surname.] [For legal persons: full name, including the legal form as provided in the register in which it is incorporated, if applicable.]
2.	**Reason for the notification**	
a)	Position/office	[For persons discharging managerial responsibilities: indicate the position held (e.g. Chief Executive Officer, Chief Financial Officer) within the issuer, the emission allowance market participant, the auction platform, the auctioneer, or the auction monitor.] [For persons closely associated: — indicate that the notification concerns a person closely associated with a person discharging managerial responsibilities; — provide the name and position of the relevant person discharging managerial responsibilities.]
b)	Initial notification / amendment	[Indicate whether this is an initial notification or an amendment to a previous notification. In the case of an amendment, explain the error that is being corrected by this notification.]
3.	**Details of the issuer, emission allowance market participant, auction platform, auctioneer, or auction monitor**	
a)	Name	[Full name of the entity.]
b)	LEI	[Legal Entity Identifier code, in accordance with ISO 17442.]
4.	**Details of the transaction(s): section to be repeated for i) each type of instrument; ii) each type of transaction; iii) each date; and iv) each place where transactions have been conducted**	
a)	Description of the financial instrument, type of instrument	[Indicate the nature of the instrument: — a share, a debt instrument, a derivative or a financial instrument linked to a share or to a debt instrument; — an emission allowance, an auction product based on emission allowances, or a derivative on emission allowances.]

<table>
<tr><td></td><td>Identification Code</td><td>[Identification code of the instrument as defined in the Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on reporting of transactions to competent authorities pursuant to Article 26 of Regulation (EU) No 600/2014.]</td></tr>
<tr><td>b)</td><td>Nature of the transaction</td><td>[Description of the type of transaction, using where applicable the transaction types established by Article 10 of Commission Delegated Regulation (EU) 2016/522 adopted pursuant to Article 19(14) of Regulation (EU) No 596/2014, or one of the specific examples set out in Article 19(7) of Regulation (EU) No 596/2014.

Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, indicate whether the transaction is linked to the exercise of a share option programme.]</td></tr>
<tr><td>c)</td><td>Price(s) and volume(s)</td><td><table><tr><td>Price(s)</td><td>Volume(s)</td></tr></table>[Where multiple transactions of the same nature (purchase, sale, borrowing, lending, etc.) on the same financial instrument or emission allowance are carried out on the same day and in the same place, indicate in this field the prices and volumes of such transactions, in two columns as shown above, inserting as many rows as necessary.

Use the data standards for price and quantity, including, where applicable, the currency of the price and the currency of the quantity, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on reporting of transactions to competent authorities pursuant to Article 26 of Regulation (EU) No 600/2014.]</td></tr>
<tr><td>d)</td><td>Aggregated information:
• Aggregated volume
• Price</td><td><table><tr><td>Price(s)</td><td>Volume(s)</td></tr><tr><td>•</td><td></td></tr></table>[Volumes of multiple transactions are aggregated when such transactions:

— relate to the same financial instrument or emission allowance;

— are of the same nature;</td></tr>
</table>

		— are conducted on the same day; and — are conducted in the same place. Use the data standards for quantity, including, where applicable, the currency of the quantity, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on reporting of transactions to competent authorities pursuant to Article 26 of Regulation (EU) No 600/2014.] [Information on prices: — in the case of a single transaction, indicate the price of that transaction; — where volumes of multiple transactions are aggregated, indicate the weighted average price of the aggregated transactions. Use the data standards for price, including, where applicable, the currency of the price, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on reporting of transactions to competent authorities pursuant to Article 26 of Regulation (EU) No 600/2014.]
e)	Date of the transaction	[Date of execution of the notified transaction. Use the ISO 8601 format: YYYY-MM-DD; UTC time.]
f)	Place of the transaction	[Name and identification code of the trading venue pursuant to MiFID, the systematic internaliser or the organised trading platform outside the Union where the transaction was carried out, as defined in the Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards on reporting of transactions to competent authorities pursuant to Article 26 of Regulation (EU) No 600/2014; if the transaction was not executed on any of the above venues, indicate "outside a trading venue."]

ANNEX B

Form for the declaration of acknowledgement and full acceptance of the Procedure and the possible conferment of the Assignment pursuant to art. 5 of the Procedure

Section I

Dear Sirs

Kaleon S.p.A.
Via Privata Maria Teresa 4
20123
Milano (MI) (Italy)

The undersigned ___________________________________ born in ________________, on _______________, resident in __________________, Via/Piazza ______________________________ nr. _____, in the position ______________(Manager) of Kaleon S.p.A.

Hereby declare and certify

- that I have received a copy of the "Internal Dealing Procedure" adopted by Kaleon S.p.A. (the Procedure), that I have read it and accept its contents in full and without reservation;
- that I have acknowledged that I have been included in the list of Managers pursuant to article 1 of the Procedure and, therefore, that I am subject to the disclosure obligations provided for by the Procedure and the Regulations in force (as defined in the Procedure)
- to undertake to comply with all the obligations imposed on me by the Procedure, including that of informing the Persons Closely Associated with me, as defined in article 1 of the Procedure, of the existence of their obligations pursuant to the Regulations in force.

Hereby list

- the following names of the Persons Closely Associated with me to whom a copy of the Procedure has been notified and who have been informed of their obligations under the Procedure:

First name Surname / Company name	Relation	Telephone n.	E-mail address

Place and date

____

Signature

____

I also declare that I have received from Kaleon S.p.A., and undertake - if necessary - to provide a copy to the Persons Closely Associated with the undersigned, as defined in article 1 of the Procedure, the following information:

INFORMATION GIVEN TO THE INTERESTED PARTY FOR THE PROCESSING OF DATA

Pursuant to Article 13 of European Regulation No. 679/2016 on the protection of personal data (**GDPR**), and in relation to the personal data you provide pursuant to the "Internal Dealing Procedure" (the **Procedure**), we inform you of the following:

1. The processing to which the personal data provided by you will be subject will take place in accordance with the provisions of the Procedure in compliance with legal obligations.

2. The processing will also be carried out with the aid of electronic or automated means.

3. The provision of personal data in accordance with the Procedure is mandatory.

4. The personal data you provide will be communicated, as provided for in Regulation (EU) 596/2014 of the European Parliament and of the Council of 16 April 2014, Legislative Decree No. 58 of 24 February 1998 and the Regulations adopted by Consob with Resolution No. 11971 of 14 May 1999 and subsequent amendments and additions, to Consob and to the public.

5. You have the right to know, at any time, which are your data at the Data Controller and how they are used; you also have the right to exercise the rights of the data subject pursuant to Articles 15 et seq. of the GDPR. To exercise your rights, as well as for more detailed information about the subjects or categories of subjects who are aware of your data as managers or agents, you can send written notice to the Data Controller Kaleon S.p.A. - Via Privata Maria Teresa 4 - 20123, Milano (MI).

6. The data controller is Kaleon S.p.A. - Via Privata Maria Teresa 4 - 20123, Milano (MI).

Kaleon S.p.A.

Section II

(Applicable to Procedure Managers)

Hereby declare the following:

- to grant Kaleon S.p.A. (**Kaleon**) the mandate as per art. 5 and following of the Procedure so that it may carry out, on my behalf and on behalf of the Persons Closely Associated with me and with my express authorization, under the conditions and within the terms provided by the Procedure itself, the communication to Consob [and to the public] of the Manager Transactions carried out by me personally and by the Persons Closely Related to me, as per the "Internal Dealing Procedure" of Kaleon (the **Procedure**);
- that I therefore undertake to notify Kaleon, pursuant to art. 5.3 of the Procedure, of each Manager Transaction that has reached the Relevant Amount, carried out by myself or on my behalf and/or by the Persons Closely Associated with me or on their behalf, **within 1 (one) working day**, starting from the Execution Date, in the case of Managers, by correctly completing and sending to the Person Responsible the form in Annex A of the Procedure;
- the engagement shall be effective from the date of receipt by Kaleon of this Form until terminated by Kaleon or myself in writing no later than **5 (five) business days prior** to the effective date of such termination;
- Kaleon may also consider this Assignment as terminated with immediate effect, without the need for any notice, in the event that I fail to comply with the above conditions and methods of sending the notices provided for by the Procedure;
- for all matters not provided for in this Form, the provisions of the Procedure shall apply.

Place and date	Signature
____________________________	_________________________