

TREVI - Finanziaria Industriale S.p.A.

Registered Office Cesena (FC) – 201 Via Larga - Italy

Share capital Euro 35,097,150 fully paid - up

Tax Code, VAT number and Forlì – Cesena Business Registry: 01547370401

Forlì – Cesena Chamber of Commerce Business Registry no. 201,271

PROCEDURE FOR KEEPING AND UPDATING THE REGISTER OF PERSONS WITH
ACCESS TO THE PRIVILEGED INFORMATION INDICATED IN ART. 114 PARA. 1
OF ITALIAN LEGISLATIVE DECREE NO. 58/1998

Approved by the Board of Directors on 28th August 2014

**PROCEDURE FOR KEEPING AND UPDATING THE REGISTER OF PERSONS WITH
ACCESS TO THE PRIVILEGED INFORMATION
INDICATED IN ART. 114, PARA. 1 OF ITALIAN LEGISLATIVE DECREE NO. 58/1998**

1. Introduction

In fulfilment of the provisions contained in art. 115-bis of Italian legislative decree no. 58 dated 24 February 1998 (hereinafter “TUF”), which provide for the establishment of a register of persons who – both on a regular and occasional basis – have access to the privileged information indicated in art. 114, paragraph 1 of the TUF owing to their working or professional activity or the functions they perform, and in observance of the provisions in CONSOB National Commission for Companies and the Stock Exchange regulation no. 11971 and subsequent amendments (hereinafter, “Issuers Regulation”), as of 1 April 2006 TREVI – Finanziaria Industriale S. p. A., parent company of the Trevi group (hereinafter the “Company”) has established the “Register of Persons with Access to the Privileged Information indicated in art. 114, paragraph 1 of the TUF” (hereinafter, the “Register”).

In order to define the criteria and procedures for keeping and managing the data, the Company has adopted this “Procedure for Keeping and Updating the Register of Persons with Access to the Privileged Information indicated in art. 114, paragraph 1 of the TUF” (hereinafter “Procedure”).

The notion of “privileged information” is that which is set out in art. 114, paragraph 1, of the TUF (hereinafter, “Privileged Information”).

1. Structure of the Register of Persons with Access to the Privileged Information indicated in art. 114, paragraph 1 of Italian Legislative Decree no. 58/1998 (hereinafter “Register”).

The Register of Persons with Access to the Privileged Information indicated in art. 114, paragraph 1 of the TUF is divided into the two following sections:

- The first indicates the persons who, owing to their working or professional activity or the functions they perform, have access to Privileged Information on a regular basis (Section A);

- The second indicates the persons who, owing to their working or professional activity or the functions they perform, have access to Privileged Information on an occasional basis (Section B);

Section A of the Register contains the name or company name of:
for TREVI - Finanziaria Industriale S.p.A.:

- a) the members of the Company Board of Directors;
- b) the regular members of the Company Board of Auditors;
- c) the CEO / Central Manager (if there is one);
- d) the Chief Financial Officer (CFO) of the Trevi group – the executive in charge of drawing up the company’s accounts - and the members of the Finance Office;
- e) the Structured Finance Manager;
- f) the Investor Relator;
- g) the Consolidated Financial Statements Office Manager
- h) the Director of Human Resources;
- i) the Tax and Corporate Office Manager;
- l) the Internal Control Department Manager;
- m) the Legal Department;
- n) the Group Communications Office Manager;
- o) the auditing company used to audit the accounts (hereinafter “Auditing Company”);
- p) the consultants and professionals who have regular access to Privileged Information owing to the professional activity that they perform.

For the Company’s subsidiaries:

- a) the members of the Board of Directors;
- b) the regular members of the Board of Auditors;
- c) the CEO;
- d) the Administrative Director;
- e) the Auditing Company;
- f) the Internal Control Department Manager;
- g) the consultants and professionals who have regular access to Privileged Information owing to the professional activity that they perform.

For registering the above figures from the Company's subsidiaries in Section A, the structure of the Trevi group is taken into account as well as the bearing that the subsidiary's Privileged Information can have on the Company or its financial instruments.

Section B of the Register contains the name or company name of:

- a) employees of the Company or subsidiaries who, in relation to specific activities performed, have access to Privileged Information on an occasional basis;
- b) consultants who provide their professional services on behalf of the Company or the subsidiaries who, for specific projects and/or operations as well as particular events and/or facts, have access to Privileged Information on an occasional basis;
- c) any other subject other than those indicated under the previous letters who, owing to their working or professional activities or the functions performed on behalf of the Issuer or subsidiaries, has access to Privileged Information on an occasional basis.

2. Procedures for keeping the Register.

The Register is kept using computerised means, and consists of a system that is accessible by Internet and protected by suitable safety criteria so as to ensure the prompt fulfilment of the legal and regulatory obligations, and, in particular, the simple access, management, consultancy and storage of the data contained in the Register.

For each person the register contains the following information:

- the person's ID. In relation to legal persons, institutions or associations of professionals, it also indicates the identity of the person of reference who can identify those with access to Privileged Information;
- the date of the person's inclusion in the Register;
- the reason for the person's inclusion in the Register;
- the date each time the information referring to the person is updated;
- the date the person is cancelled from the Register (if appropriate);
- the reason the person is cancelled from the Register (if appropriate).

The data on the people included in the Register is kept for at least five years after the circumstances leading to their registration or the updating of their details have ceased to exist.

3. Person in charge of keeping and updating the Register.

The person who occupies the role of Company Investor Relations officer is in charge of keeping and updating the Register (hereinafter “Person in Charge”).

It is the task of the Person in Charge to:

- record the persons in the Register;
- update the information on the persons contained in the Register;
- cancel those persons from the Register who no longer have access to Privileged Information;
- give the obligatory information to the persons included on the Register pursuant to art. 152 *quinquies* of the Issuers Regulation.

For the purpose of keeping and updating the Register, the Company and Subsidiary administration, direction and control bodies must inform the Person in Charge, without delay and in writing, of the information needed to update the Register on the people to include and included in the different Sections of the Register.

Having received the above communication, the Person in Charge updates the Register without delay.

The Person in Charge informs each person concerned of (i) their inclusion in the Register, updates of the information contained and if the reasons for their inclusion have ceased to exist; and (ii) the obligations deriving from having access to Privileged Information and the sanctions set out for the unlawful deeds in Title I *bis* of Part V of the TUF or in the event of unauthorised dissemination of the privileged information.

The data relating to the persons included in the Register is processed in observance of the provisions set out in Italian legislative decree no. 196/2003, as subsequently amended and integrated, and in the other applicable legal provisions.

Upon request by the persons concerned, the Person in Charge shall send them a copy of their personal information contained in the Register.

4. Amendments and integrations to this Procedure.

The Chairman of the Company's Board of Directors shall make those amendments and integrations that may become necessary and/or opportune as a result of legal and/or regulatory amendments or clarifications by the competent Supervisory Authority, as well as organisational changes to the Company and its Subsidiaries.