

The Ten Commandments against Market Abuse

1. All persons involved (not only employees, but also external collaborators) must strictly adhere to the rules. The rules governing inside information and insider dealing apply to all persons working for the EPG Group under an employment contract or otherwise, including members of governing and supervisory bodies, as well as independent service providers and suppliers.

2. Be clear about whether you possess inside information. Inside information is information of a 'precise nature' which 'has not been made public', relating, directly or indirectly, to one or more issuers or one or more financial instruments and which, if made public, would be likely to have a 'significant effect' on the prices of those financial instruments or on the price of related derivative financial instruments. In addition to financial instruments, inside information may also relate to commodity derivatives and/or emission allowances or auctioned products based on them.

3. Do not disclose inside information to anyone (except as noted below) and ensure its confidentiality and security. Unlawful disclosure of inside information arises where a person possesses inside information and discloses that information to any other person, except where the disclosure is made in the normal exercise of an employment, a profession or duties. Unlawful disclosure of inside information is prohibited. All communications, including electronic communications, relating to inside information must be conducted in a manner that ensures its confidentiality and security.

4. If it is absolutely necessary to disclose inside information to others, follow the "need-to-know" principle. When disclosing inside information – whether externally or to other entities within the EPG Group – the person making the disclosure must always consider whether such disclosure is necessary for the normal exercise of their employment, profession, or duties. The recipient must have a relevant and legitimate need for the information. A strict "need-to-know" principle applies.

5. If you have inside information, you are an insider. Insider dealing arises where a person possesses inside information and uses that information by acquiring or disposing of, for its own account or for the account of a third party, directly or indirectly, financial instruments to which that information relates.

6. Insiders must not trade in securities to which inside information relates. It is prohibited to engage or attempt to engage in insider dealing and/or to recommend that another person engage in insider dealing or induce another person to engage in insider dealing.

7. There are exceptions to the prohibition of insider dealing, but they apply to only a limited number of cases. Not every acquisition or disposal of financial instruments while in possession of inside information constitutes insider dealing – there are exceptions, subject to strict conditions, known as legitimate behaviour.

8. Strict sanctions are imposed for violations of these rules. A person who fails to comply with the prohibition of the unlawful disclosure of inside information and/or insider dealing may face various sanctions, including disciplinary actions by their employer, administrative and/or criminal sanctions, including imprisonment.

9. Comprehensive acquaintance with the rules is essential. To mitigate risks of unlawful disclosure of inside information and/or of insider dealing, you should carefully read the EPG Group Market Abuse Policy and the related Insider Dealing Directive and familiarize yourself with the requirements set out in Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse.

10. Feel free to ask questions or report any potential breaches of the rules. If you have any concerns about the handling of inside information or any related matter, please feel free to contact the EPG Group's Compliance Officer, who is available to provide you with the support you need. If you become aware of a breach of the rules set out in the documents referred to in Section 9 above, you can report it through the EPG Group's internal whistleblowing system. Further details on how to make a report and on the internal whistleblowing system are set out in the Company's Whistleblowing Directive.