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Saes Getters S.p.A.

Procedure for the Management of Inside Information

Adopted by the Board of Directors of SAES Getters S.p.A. on 20 July 2017, to replace the previous version adopted on 24 March 2006, as subsequently reviewed on 29 June 2007, which latter version was adopted to replace the previous "Procedures for the Internal Management and External Disclosure of Documents and Information Regarding the Company, with particular reference to Price Sensitive Information", which had been adopted on 19 December 2002.

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1. FOREWORD

Saes Getters S.p.A. (hereinafter, the "**Company**"), pursuant to:

- Regulation (EU) No. 596/2014 of the European Parliament and the Council of 16 April 2014 on market abuse (hereinafter, "**MAR**"), which modified and harmonised European Community regulations on inside information and market abuse;
- and MAR Commission Implementing Regulation (EU) 2016/347 of 10 March 2016 laying down implementing technical standards with regard to the precise format of insider lists, Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016 laying down implementing technical standards with regard to the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information, and other additional provisions reported in the text of this procedure;
- Consob Resolution No. 19925 of 22 March 2017 concerning the modifications to the implementing regulations relative to Legislative Decree No. 58 of 24 February 1998 (hereinafter, the "**Italian Consolidated Finance Law**") for the implementation of the MAR;
- the provisions of Articles 114, 115-bis, and 181 of the Italian Consolidated Finance Law, the relative implementing regulations concerning the issuers regulations, adopted by Consob with Resolution No. 11971 of 14 May 1999, as amended (hereinafter, the "**Issuers Regulations**"), the Regulations of the trade markets organised and managed by Borsa Italiana S.p.A., and the relative Instructions;
- the Borsa Italiana S.p.A. Corporate Governance Code (adopted by the Corporate Governance Committee for Listed Companies), which the Company comply with and which recommends the adoption of procedures for the internal management and external disclosure of documents and information regarding the Company, with special focus to inside information;

has approved, by Resolution of the Board of Directors of 20 July 2017, the present Procedure for the Management of Inside Information (hereinafter, the "**Procedure**") to modify and replace the previous "Procedure for the Management of Inside Information", approved by the Board of Directors of the Company on 24 March 2006, and the "Procedures for the Internal Management and External Communication of Documents and Information regarding the Company, with special reference to Price Sensitive Information", approved by the Board of Directors of the Company on 19 December 2002.

1.1. Purpose of the Procedure This Procedure is aimed at regulating, with binding effect,

- a) the obligations which Directors, Auditors, managers, and employees, each within their own sphere of competence, and the consultants of the Company, must comply with respect to the management of inside information as to the Company;
- b) the disclosure obligations which the Company is under obligation to comply with respect to the market.

2. INSIDE INFORMATION

2.1. Definition of Inside Information The term Inside Information shall mean, pursuant to Article 7 of the MAR, "inside information shall mean *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*¹ and which, if it were 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."

On such regard, under the MAR,

- i. any information shall be deemed to be of a precise nature in the measure in which such information:
 - a. refers to a series of circumstances that are in existence or which may be reasonably be expected to come into existence, or to or an event which has occurred or which may reasonably be expected to occur, ; and
 - b. is sufficiently specific to enable to gather conclusions on the possible effect of said set of circumstances or said event over the prices of the financial instruments or the relative derivative financial instrument;
- ii. by information that, if disclosed to the public, would likely have a significant effect over the prices of the financial instruments or the derivative financial instruments, is meant any information which a reasonable investor, once having learned such information, would likely use as one of the elements upon which to base their investment decisions;
- iii. where the information concerns a long-term process that is intended to bring about, or that results in, particular circumstances or a particular event, such future circumstance or future event, and also the intermediate steps of such process which are connected with bringing about or resulting in those the future circumstance or that future event, may be deemed to be information of a precise nature. An intermediate step in a protracted process² is considered Inside Information where, by itself, it meets the requirements above detailed in the definition of Inside Information.

For the purpose of a proper interpretation of the notion of Inside Information, the Company keeps into consideration also the guidelines issued from time to time by

¹ The term Financial Instrument shall mean:

- a) any financial instruments admitted to trading or for which a request for admission to trading in a regulated market in Italy or in any other country within the European Union;
- b) the financial instruments referred to in Article 1, paragraph 2, of the Italian Consolidated Finance Law, issued by the Company, admitted to trading in a multilateral trading facility (MIF), or for which the admission to such facilities was requested or authorised by the issuer;
- c) the financial instruments issued by the Company, traded over an OTF (*Organized Trading Facility*);
- d) the financial instruments, issued by the Company, other than those listed under letter a), b), and c), which price or value depends on one of the financial instruments listed under such letters, or has an effect over such price or value, including, but not limited to, *credit default swaps* and contract for differences.

² Information regarding an event or a series of circumstances that constitute an intermediate step of a long-term process may relate to, by way of example, (i) the state of contractual negotiations; (ii) terms provisionally agreed in contract negotiations; (iii) the possibility of placing financial instruments; (iv) the conditions under which said instruments are sold; (v) the provisional terms for the placement of financial instruments; (vi) the possibility for a financial instrument to be included in or removed from a major index (Considering 17 MAR). By way of example and not limitation, with respect to merger processes, the steps preceding the finalisation of the operation - such as, for instance, the definition of specific elements of the merger (e.g., determination of the share swap value and the characteristics of the merger project, etc.), or the reaching of a step of negotiations from which the successful conclusion of the process may reasonably be expected to be likely - may be considered to be Inside Information.

Consob and ESMA with respect to the (non-exhaustive) lists of information that may reasonably be envisaged to be the object of disclosure to the market, in line with statutory or regulatory provisions of European or Italian law, and with market and contractual rules, business practice, or customs. The Company shall periodically update this Procedure and/or provide updates to the interested persons with respect to the above further clarifications.

2.2. Entities under obligation to disclose information to the market Pursuant to the provisions of Article 17 of the MAR, and Article 114 of the Italian Consolidated Finance Law, the Company discloses to the public, as soon as possible, the Inside Information that directly concern the Company, including when generated in its subsidiary companies, with technical instruments compliant with the implementing regulations as detailed under Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016, through a Disclosure (hereinafter, the "**Press Release**"), published as provided under section 4 below.

The Company imparts to its subsidiaries written instruction to promptly provide any necessary information to comply with the market disclosure obligations, as regulated under section 10 of this Procedure.

2.3. Mapping of Relevant Information Flows In order to facilitate the identification of the moment when a piece of information may take the nature of Inside Information, the Company identifies and monitors the information flows which, based on their repetitiveness, may be reasonably expected that they will take, at a later time, the nature of Inside Information (hereinafter, "**Relevant Information Flow**" or "**Flows**").

2.4. Relevant Information and RIL The person in charge of every corporate function, or so-called *process owner*³, also based on the mapping of the Flows - should they have reason to deem⁴, within their sphere of operation, that a specific piece of information, due to its characteristics, may be deemed, at a later time, Inside Information (hereinafter, the "**Relevant Information**"), the process owner shall:

- a) promptly identify the single individuals within the Company and/or the persons (or positions) outside the Company who have access thereto;
- b) inform the Corporate Information Controller, as identified herein, on the Information at issue;
- c) communicate the identification data as per letter a) above to the Corporate Information Controller and to the Person in Charge of Lists, as defined herein;
- d) communicate any subsequent variation, for the purpose of updating the RIL, to the Person in Charge of Lists, as defined below.

Relevant Information might encompass, by way of example, the preliminary and early steps of the following activities:

- negotiations pertaining to the conclusion or renegotiations of agreements of strategic importance for the Company;

³ The so-called *process owners* are individuals within the organization, who, on account of their position within the company, have greater awareness of the event and/or circumstance that generates the Inside Information, and of the identity of the persons involved in the relative Relevant Information Flow, are classified, pursuant to this Procedure, as persons in charge of monitoring the process through which the Relevant Information is formed.

⁴ Each person in charge of a function, in case of doubt, must at all times refer to their Corporate Information Controller.

- negotiations and/or preliminary phases of processes inherent to acquisitions or disposal of business, going concerns, assets, including shareholdings;
- filing of new patents;
- negotiations of agreements aimed at the exploitation of patents, the acquisition/sale of licenses of use and/or other rights over intangible assets falling within the scope of the Company's core business;
- impairment test activities carried out in the preparation of the Company's accounting records;
- preparatory activities to entering (or exiting) new markets/business areas that are strategic for the Company;
- mergers, de-mergers, capital increases and other extraordinary operations;
- starting redundancy procedures, Cassa Integrazione (*Wages Guarantee Fund*) procedures, and/or corporate restructuring operations in general.

Based on the operations received, the Corporate Information Controller qualifies the information as Relevant Information, and the Person in Charge of Lists updates the list of the persons with access to the Relevant Information created by the Company (**Relevant Information List**” or “**RIL**”), as per section 6 below.

The RIL is managed by the Person in Charge of Lists, in accordance with the process detailed in section 6 of this Procedure.

The Corporate Information Controller, as provided under section 7 in this Procedure, also ensures the compliance with the measures aimed at reducing the risk that persons who have no reason to have knowledge of specific Relevant Information have access thereto.

2.5. Qualification of Information as Inside Information For the purpose of complying with the market disclosure obligations pursuant to Article 17 of the MAR, and Article 114 of the Italian Consolidated Finance Law, the Company entrusted the task of assessing information for the purpose of its classification as Inside Information to one of the Company's Managing Directors (hereinafter, the "**Corporate Information Controller**").

Such assessment must be done on a case-by-case basis (keeping into consideration the size of the Company, the sector in which it operates, and the market sentiment towards the Company), and it focuses on the information which was previously deemed to be Relevant Information, it being understood that the Corporate Information Controller is called to identify and qualify as Inside Information any information that falls within the scope of the definition of Inside Information pursuant to the MAR, even when not previously classified as Relevant Information, and which has come to light based on indications from any representative of the Company.

For the purpose of establishing whether, in each specific case, a piece of information should be deemed as Inside Information, four conditions, pursuant to Article 17, paragraph 1, and 7, paragraph 1, letter a) of the MAR, and section 2.1 of this Procedure, must be taken into consideration. Specifically, a piece of information must:

- a) directly concern the issuer SAES Getters S.p.A. (and its consolidation perimeter);
- b) not have been made public;
- c) have a precise nature;
- d) be material, i.e., in other words, be such that if it were made public, it might have a significant effect on the prices of the financial instruments.

The presence of such conditions should be assessed also with reference to intermediate steps of long-term processes, as Inside Information may arise even before the conclusion of the process of which they are a part.

As to point a) above, it should be noted there is no public disclosure obligation for any information relating to the Company *indirectly*⁵, meaning, among others, any information which - though affecting or being able to affect the prices of the financial instruments issued by the Company - are originated by persons external to the Company.

As to the conditions listed under point b) above, the notion of information that have not been disclosed of the public includes any information that have not yet been disclosed of the public in compliance with the proper process provided by the statutory regulations concerning the disclosure of information, as per section 4 below.

As to the precise nature of the information, as per point c) above, according to Article 7, paragraph 2 of the MAR, the precise nature of information depends on the existence of both of the following conditions:

- i. the information refers to a series of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur in the future; and
- ii. the information must be sufficiently specific enable a conclusion to be drawn as to the possible effects of the set of circumstances or event over the prices of the financial instruments or the relative derivative financial instruments.

As to the so-called material character of the information, as per point d) above, the assessment focuses on the degree of likelihood with which an effect over the prices may reasonably be expected as a consequence of the public disclosure of the Information.

In evaluating whether the above conditions are met, the Company refers to the indications and criteria published by Consob and/or by ESMA.

The Corporate Information Controller keeps track of the analyses made to assess whether a piece of information is to be classified as Inside Information; for the purpose of such analysis, the Corporate Information Controller is assisted by the Legal Department and the Investor Relations Office: an email outlining the assessment process is kept on record by the Company.

2.6. Obligations concerning the classification of information as Inside Information When a piece of information is qualified as Inside Information by the Corporate Information Controller, the Company will, as soon as possible, disclose the Inside Information to the market by issuing a Press Release, as outlined in section 4 of this Procedure, unless it has not been decided to activate the so-called "delay" procedure, as detailed in section 5 of this Procedure, upon the occurrence of the applicable conditions.

If and when the so-called "delay" procedure is activated, the Company:

- a) enters the persons having access to such Inside Information in the Insider List, in accordance with section 6.2 below, using, if needed, the data included in the RIL;

⁵ For example: (i) data and statistics issued by public institutions; (ii) decisions by the central bank on interest rates; (iii) decisions taken by the Government on issues including taxation, sector regulations, debt management, etc.; (iv) decisions taken by public authorities and local government institutions; etc.

- b) ensures that the confidentiality and information segregation measures as detailed in section 7 of this Procedure remain in place.

2.7. Doubts In the event of reasonable doubt as to whether information should be qualified as Inside Information, the Company releases a Press Release (or activates the disclosure delay procedure, if the relative conditions apply).

3. SPECIFIC DISCLOSURE OBLIGATIONS

3.1. Further Disclosure Obligations Without prejudice to the obligation - pursuant to Article 17 of the MAR and Article 114 of the Italian Consolidated Finance Law - to disclose to the public the Inside Information that directly concerns the Company, including when such information is generated from its subsidiaries, the Company, following the procedure detailed in section 4 below, also informs the public on:

- a) any accounting circumstances that are destined to be reported in the Company's financial statements for the year, in the condensed half-yearly financial statements, and the accounting records destined to be reported in the interim financial reports, when such circumstances are communicated to external parties, except where the disclosure thereof occurs over the normal exercise of the work, profession, function, or office, and the above parties are bound to keep the information received as confidential, and the disclosure is made in compliance with the obligations of law, or as soon as the information has acquired a sufficient degree of certainty;
- b) the resolutions by which the Board of Directors approves the draft financial statements, the consolidated statements, the dividend distribution proposal, the condensed half-yearly financial statements, and any additional periodic financial reports, and on the resolutions by which the General Meeting of the Shareholders approves the financial statement for the year, and the distribution of the dividend;
- c) any significant changes of the Inside Information already disclosed to the public.

3.2. Breach of confidentiality obligations by individuals with access to Inside Information In the presence of unequivocal signs of the fact that, in spite of the adoption of procedures suitable to keep the Inside Information as confidential, the confidentiality obligations are breached by persons with access to the Inside Information which have been delayed according to the disclosure delay procedure, the Company must release a Press Release as soon as possible.

It has to be acknowledged that, in the event Inside Information subject to a disclosure delay procedure is disclosed to third parties who are not bound to keep said information as confidential under any legal, regulatory, or contractual obligation or under the Company's bylaws, the Company will disclose in full said Inside Information to the public through a Press Release.

3.3. Rumours Without prejudice to the market disclosure obligations applicable when the confidentiality obligations relating to Inside Information are breached, as provided under section 3.2 above, when:

- information is released to the public *not* pursuant to Article 66 of the Issuers Regulations, concerning the asset, economic, or financial position of the

Company and/or its subsidiaries, or any extraordinary financial operations, or the trend of the Company's business (so-called *rumours*)
and

- the market price of the financial instruments is subject to a significant variation, meaning a variation not in line with market trends as compared to their latest price on the previous day,

the Company promptly informs the public, by issuing a Press Release, on the truth of the information, or rectifies the content thereof, where necessary, in order to restore proper and equal information among the public.

In the absence of relevant variations in the market price, but in the presence of rumours that may represent unequivocal signs that the confidentiality obligations have been breached, the provisions of section 3.2 above shall apply.

4. METHOD OF DISCLOSURE OF INSIDE INFORMATION TO THE MARKET

4.1. Principles The Inside Information must be disclosed to the market in the utmost and fullest compliance with the principles of honesty, clarity, transparency, and timeliness, and with full and homogeneous disclosure, to ensure equal treatment, comprehensiveness, intelligibility, and continuity of information. In compliance with Article 17, paragraph 1 of the MAR, the Company shall disclose the Inside Information to the market in a manner that enables the public to attain fast access to the Inside Information, and complete, correct, and timely assessment of the information by the public.

4.2. Drafting and content. A draft of the Press Release is drawn up by the Investor Relations Office based on the content indicated by the Corporate Information Controller, after consulting, if required, the Legal Department and/or other corporate functions based on the nature of the Inside Information being disclosed. Where the Press Release should concern the disclosure of accounting data for the period and other summary financial information, the content thereof is authorised also by the Officer in Charge of drawing up the Company's accounting records.

In the above activities, the Company complies with the provisions indicated in Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016, in the Issuers Regulations, and adopted by the company that manages the market, concerning:

- a) minimum content of the Press Release and manner in which to represent the information contained therein with regard to single types of events;
- b) technicalities in which the information is to be disclosed to the public by listed companies.

In particular, the Press Release indicates:

- a) the fact that the information released is qualified as Inside Information;
- b) the full name of the Company;
- c) the identity of the individual issuing the disclosure, including name, surname, and position held in the Company;
- d) the subject matter of the Inside Information;
- e) the date and time of when the Press Release is released to the media;
- f) any elements suitable to allow a full and correct evaluation of the events and circumstances represented in the Press Release;

- g) any connections and comparisons with the content of any previous Press Releases;
- h) any significant changes to the Inside Information already disclosed to the public.

In any event, the Press Release does not include any marketing, or in any case promotional, content, in order not to mislead the public.

4.3. Technicalities The Company disclose the Inside Information to the market through the Investor Relations Office, who sends the Press Release:

- to the company that manages the market;
- to Consob;
- to at least two press agencies.

The Investor Relations Office sends the above through the dedicated system for the disclosure of regulated information (SDIR) authorised by Consob, to disclose regulated information to the public⁶.

4.4. Time-frame The Press Release, once is finalised and validated by the Corporate Information Controller, must be issued as soon as possible.

4.5. Notice to Consob and to the company that manages the market The Investor Relations Office sends a notice to Consob, including via phone call and with suitable advance, of the possibility that the Company will disclose particularly relevant Inside Information while the Company's financial instruments are undergoing the trading phase. Same notice is given to the trading market provider company, in compliance to market regulations.

4.6. Publication on the Company's website Every Press Release shall also be published, by the opening of the market on the day following the Press Release, on the website of the Company, where it will be available for five years of its first publication.

5. DELAY OF DISCLOSURE

5.1. Conditions The Corporate Information Controller may decide to delay the disclosure to the public of Inside Information, provided that the following conditions are met, as per Article 17, paragraph 4 of the MAR.

- a) when the immediate disclosure would be likely to prejudice the Company's legitimate interests;
- b) when the delay in disclosure would probably not have the effect of misleading the public;
- c) when the Company is able to ensure the confidentiality of the Inside Information.

⁶ The term Regulated Disclosures, as defined under Article 113-ter of the Italian Consolidated Financial Law, shall mean "disclosures published by listed issuers, listed issuers for which Italy is the home member state or their controlling bodies, pursuant to the provisions of this Title, Chapters I and II, Sections 1, I-bis, and V-bis, and to related enactment regulations or provisions established by non-EU country authorities considered the equivalent of Consob" (thus, among others, Inside Information, "internal dealing" disclosures, disclosures on buy back operations, etc.).

5.2. Practical Cases Also taking into account the indications provided by Consob and ESMA, the following cases are considered (by way of practical examples but without being limited to⁷) to identify the criteria detailed under section 5.1 above.

5.2.i – Legitimate Interests. The term Legitimate Interests shall apply, in abstract, to those arising from the following situations (by way of example and without limitation):

- a) the Company is engaged in negotiations whose outcome may likely be compromised by an immediate disclosure to the public. Some examples of the above negotiations may relate to those concerning mergers, acquisitions, demergers, and splits, to the purchase and sale of relevant assets or going concerns, and to restructuring and reorganization operations;
- b) the financial viability of the issuer is in serious and imminent danger, including when not falling within the scope of the applicable bankruptcy laws, and the immediate disclosure of the Inside Information to the public would seriously prejudice the interest of existing or potential shareholders, compromising the closing of the negotiations under way to ensure the Company's financial recovery; the Company has developed a product or an invention, and the immediate disclosure of such information to the public might jeopardize the intellectual property rights of the Company;
- c) the Company is planning to purchase or sell relevant shareholdings of another entity, and the disclosure of such information might compromise the execution of such plan;
- d) a previously announced operation is subject to the approval of a public authority, and such approval is subject to the meeting of further requirements, where the disclosure of such requirements to the public might influence the Company's capacity to meet said requirements, and thus undermine the final success of the operation or agreement;

5.2.ii – Effect of Misleading the Public. Situations where a delay in disclosing the Inside Information may mislead the public may include (by way of example and without limitation),

- a) the Inside Information is substantially different from a previous public announcement by the issuer with regard to the same subject matter referred to in the disclosure;
- b) the Inside Information relates to the fact that the issuer's financial objectives will likely not be attained, where such objectives were previously announced to the public;
- c) the Inside Information is contrary to market expectations, where such expectations are based on signs previously sent by the issuer to the market, including interviews, itinerant promotional campaigns or any and whatsoever other type of disclosure or announcement organized by the issuer or with the latter's consent.

5.2.iii – Ensuring Confidentiality. Confidentiality is ensured by setting up measures to protect the Inside Information, taken within and outside the Company, to prevent the

⁷ It is understood that, irrespective of the practical cases provided, the existence of the conditions to delay disclosures must be considered on a case-by-case basis.

access to Inside Information by any persons other than those who have a need to access thereto in the normal performance of their professional activities or function. As to the confidentiality measures adopted by the Company, please refer to section 6 of this Procedure.

5.3. Procedure. Where the Corporate Information Controller should decide not to disclose the Inside Information immediately,

A. the decision to delay the disclosure is formalised in writing by the Corporate Information Controller in a document having a certified date; the certainty of the date may be obtained through the use of PEC, i.e. certified e-Mail (where Company sends a certified e-mail to its own certified mail address), or through dedicated electronic records (a special section in the Insider List).

The decision must report the following information, pursuant to Article 4 of Commission Implementing Regulation (EU) 2016/1055;

- date and time when the decision to delay the disclosure of the Inside Information was taken;
- estimate date and time of the probable future disclosure of such Inside Information;
- identity of the individuals who have contributed to the decision of the Corporate Information Controller to delay the disclosure of the Inside Information, and the decision that establishes the start of the delay period and its probable end;
- identity of the individuals who will be responsible for monitoring, with continuity, the conditions that allow the delay of the disclosure;
- evidence of the initial existence of the conditions that allow the delay of the disclosure, including:
 - adoption of the measures to protect the information, both within and outside the Company, to prevent the access to Inside Information by persons other than those with a need to access such information in the normal performance of their professional activity or their function;
 - procedures being set up to disclose the Inside Information as quickly as possible as soon as the confidentiality thereof is no longer guaranteed;

B. once the decision to delay the disclosure of the Inside Information is taken, the individuals with access to the undisclosed Inside Information are registered in the List of persons with access to Inside Information ("**Insider List**") as provided under section 6 of this Procedure.

Company guarantees the continuing monitoring of the above conditions, until the Inside Information is disclosed, or as soon as it loses its nature of Inside Information, or the conditions that enable the delay of the disclosure cease to be present.

The Company prepares, from the moment in which the delay procedure is activated, a draft of the Press Release concerning the Inside Information, delayed pursuant to section 5.5 of this Procedure, and keeps such draft updated.

5.4. Consob Disclosures Immediately after the public disclosure of the Inside Information which was subject to the delay procedure, the Company notifies Consob, through its Investor Relations Office, that the Press Release issued actually concerns Inside Information that has been delayed, indicating the circumstances connected

thereto. Such notification to Consob, made in writing in line with the notice form attached under Attachment 1, drafted in compliance with the provision of Article 17, paragraph 4, last heading, of the MAR, and Article 4, paragraph 3 of Commission Implementing Regulation (EU) 2016/1055.

The notice is sent to the "Market Division" ("*Divisione Mercati*") of Consob, indicating "MAR Disclosure Delay" ("*MAR Ritardo Comunicazione*") in the subject line. The notice is not due if, after the decision to delay the Inside Information, the same is not disclosed to the market because it lost and is no longer qualified as Inside Information.

5.5. Preparation of the Disclosure Where the decision to delay the public disclosure of Inside Information is taken, the Corporate Information Controller activates the Investor Relations Office to draft a Press Release, with the content indicated in section 4.2 of this Procedure, seeing to the constant update thereof, based on the development of the Inside Information kept confidential, in order to have the draft of Press Release ready to be issued at short notice, even where this should be requested by Consob, or where the individuals with access to such Inside Information are no longer capable of guaranteeing the confidentiality thereof.

6. LIST OF PERSONS WHO HAVE ACCESS TO INSIDE INFORMATION (so-called *Insider List*) and TO RELEVANT INFORMATION (so-called *RIL*)

6.1. Insider List and RIL The Company creates and keeps updated:

- a) the list of the persons with access to Inside Information ("**Insider List**");
- b) a list of the persons with access to Relevant Information ("**Relevant Information List**", or "**RIL**").

The Insider List is created pursuant to and by effect of Article 18 of the MAR, of Commission Implementing Regulation (EU) No. 347 of 10 March 2016, and Article 115-*bis* of the Italian Consolidated Finance Law.

The Relevant Information List is aimed at ensuring the traceability of the individuals having access to the Relevant Information, in pursuit of the broadest and most effective monitoring of corporate information, including for the purpose of complying with the market disclosure obligations applicable to Inside Information.

The RIL is managed according to the procedures provided for the Insider List, and is kept updated until the Relevant Information is qualified as Inside Information.

6.2. Entering and Removing Persons from the Insider List and RIL The Insider List and the RIL are each organized in distinct sections, based - respectively - on single Inside Information and Relevant Information.

Each of the sections identifies all the persons who have access, over time, to such types of information.

The data recorded in the Insider List and the RIL, upon registration of individuals, is the following:

- a) surname, name, surname of birth, date and place of birth, address of residence including postal code, taxpayer identification code, telephone numbers, including work and private (landline and mobile), companies with which (or on behalf of which) each person works, and email address or fax number.

- b) the function held and the reason for access to the Inside Information or the Relevant Information;
- c) the date when the individual has obtained access to the Inside Information or the Relevant Information;
- d) the date when the individual has ceased to have access to the Inside or the Relevant Information;
- e) the date when each section's list was drawn up;
- f) in case of updating of the information detailed above, the date when such update was made, and the date and time when the change that prompted the update occurred.

Where the (external) entity having access to the Company's Inside Information or Relevant Information is a company, a partnership or other body (including, by way of example, law firms, auditing companies, etc.), within, respectively, the RIL and the Insider List, the data relative to the natural persons belonging to such company/partnership/body and who have access to the Inside Information must be recorded.

Initially, the RIL will include the persons identified within the scope of the mapping activity as per section 2.3 above. As the Relevant Information evolves, the persons who cease to have access to such evolutions and changes are removed from the RIL, and, at the same time, the persons who begin to have access thereto are progressively registered in the RIL, based on the indications provided for the mapping of information flows, as per section 2.3 of this Procedure, it being understood that the Person in Charge of the List must check any discrepancies between the data reported in the above mapping and what actually takes place - in terms of circulation and evolution of the Relevant Information.

When Relevant Information is qualified as Inside Information, the persons in the RIL are removed from the RIL and entered in the Insider List when a delay procedure is started, as per section 5 above.

In the sections of the Insider List are also entered the persons with access to information that has been qualified as Inside Information when - due to the nature of the Inside Information or due to the circumstances thereof it was impossible to map such Information at an earlier time - said persons were not already registered in the RIL, but were registered in the Insider List for the period going between the time when the information was qualified as Inside Information and the time when the Inside Information was disclosed via Press Release, as specified in this Procedure.

The Insider List also includes an additional section, called "permanent access", created irrespective of the existence of any specific Inside Information. This section includes only the persons who, on account of the function they perform or position they hold within the Company, have access at all times to all the Inside Information of the Company.

The Persons in Charge of the Lists, as indicated herein, remove a person from the Insider List when the Inside Information with respect to which the person was registered in the Insider List, has entered the public domain, including after the activation of the delay procedure detailed in section 5 above, and including after the Company has issued a Press Release on such information.

6.3. Entity in charge of keeping the Insider List and the RIL The entity in charge of keeping and managing the Insider List, and responsible for researching the data relating thereto (hereinafter, the "**Entity in Charge of Lists**") shall be the Company's Legal Department.

The Entity in Charge of Lists is also in charge of the RIL.

6.4. Communication When a person is entered in the Insider List, the Entity in Charge of Lists sends the former a notice providing essentially the same information as the form included under **Attachment 2**; vice-versa, when a person is removed from the Insider List, the Entity in Charge of Lists sends said person a notice providing essentially the same information as the form included under **Attachment 3**.

No notice is required when entering or removing persons from the RIL.

The data relating to the persons registered in the Insider List are kept for at least five years after each new entry or update.

7. CONFIDENTIALITY OBLIGATIONS CONCERNING THE RELEVANT INFORMATION AND THE INSIDE INFORMATION

7.1. Confidentiality Obligations The Directors, the Auditors, the managers, and the employees must:

- a) keep all the documents and information acquired in the performance of their duties as confidential;
- b) use the above documents and information exclusively in the performance of their functions;
- c) scrupulously comply with this Procedure.

7.2. Confidentiality Measures For the purpose of guaranteeing the confidentiality of the corporate information, and, in particular, of the Relevant Information and the Inside Information (collectively, the "**Confidential Information**"), the Company ensures the effectiveness of suitable barriers to protect the information, both within and outside the Company, in order to prevent the access to Confidential Information by persons other than those who, within the Company, have a need to access such information in the normal performance of their professional activities or their function. Such protective barriers include organisational, physical, and logical measures, and include the signing of confidentiality agreements, the physical segregation of the places and/or physical storage facilities where the information are kept, the use of keys and passwords to access the information when the latter are stored on electronic media, the use of specific written indications on the qualification of the information as Inside Information on such electronic media, specific reminders for the legitimate recipients of the Inside Information on their duty to ensure the confidentiality thereof, the mapping of Relevant Flows (as per section 2.3 above), and, more generally, the set of organizational and procedural measures which the Company set up for the proper management of the Inside Information.

7.3. Loss of Confidential Documents In the event of accidental loss of documentation pertaining to the Confidential Information, the Directors, the Auditors, the managers and the employees must immediately notify the Investor Relations and the Legal Department, detailing the conditions and circumstances of such accidental loss, so that the most appropriate measures may be adopted.

7.4. Transmission of Confidential Documents to Third Parties When transmitting - exclusively for reasons of their office - any Confidential Information or documents to third parties, the Directors, the Auditors, the senior officers, and the employees shall firstly ensure that such third parties are held, legally, or under any regulation, by-laws, or contract, to keep the documents and information received as strictly confidential.

7.5. Instructions to Subsidiaries The Company imparts its subsidiary companies suitable instructions to ensure compliance, within such organizations, with obligations of confidentiality that are substantially equivalent to those reported in this paragraph.

8. INFORMATION IN GENERAL MEETINGS OF SHAREHOLDERS AND TO TRADE UNIONS, DEALINGS WITH MEDIA, MEETINGS WITH INSTITUTIONAL INVESTORS AND ANALYSTS

8.1. Information in General Meetings of the Shareholders The disclosure of Inside Information in General Meetings of the Shareholders is allowed only when such information was preventively disclosed to the market.

In the event of involuntary disclosure of Inside Information subject to a delay procedure in such Meetings, said Inside Information must promptly be disclosed to the market by the Investor Relations Office.

8.2. Meetings with Trade Union Organisations Where, in the event of meetings with representatives of Trade Unions, who are not employees of the Company and who are not bound by confidentiality obligations, should any data concerning the Company's prospects be disclosed, the Company shall make available to the public, through a Press Release, any Inside Information being delayed under the terms of section 5 of this Procedure that may be disclosed upon such meetings.

It is understood that only the information that is strictly necessary to the performance of trade union activities may be disclosed.

8.3. Dealings with Media The Directors, Auditors, managers, and employees are absolutely barred from releasing any statement to media or make declarations in general containing any Inside Information that was not already disclosed to the market, or thus, of Inside Information which disclosure was delayed under the so-called "delay" procedure detailed under section 5 of this Procedure.

Any statements concerning Relevant Information (including, by way of example, concerning the state of negotiations in progress which are not yet eligible to be qualify as Inside Information) will have a conservative nature, in order not to arouse misleading effects or expectations.

8.4. Meetings with Institutional Investors and Analysts When the Company organises or takes part in restricted meetings with financial analysts, institutional investors, or other market operators, the Legal Department:

- a) preventively informs Consob and the company which manages the market on the date, place, and main topics to be discussed in the meeting, as indicated by the Investor Relation Office;
- b) the Investor Relations Office transmits to the company which manages the market the documentation made available to the entities attending the meeting, while the

Legal Department transmits said documentation to Consob, at the latest while the meeting is taking place.

9. COMPANY'S WEBSITE

9.1. Publication on the Company's website Without prejudice to the compliance with the public disclosure obligations applicable to Inside Information, the Investor Relations Office makes available, among others, in the Investor Relations section of the Company's website, the Company's corporate governance documents (by-laws, internal dealing code, etc.), the financial statements for the year, and the consolidated financial statements, the condensed half-yearly financial statements, any additional periodic financial reports, the full text of the Press Releases, and the documentation handed out on such meetings with market operators, for at least five years from their publication.

9.2. Methods and Criteria for Publication For the purpose of ensuring proper information, the Investor Relations Office in addition to guaranteeing the full compliance with the principles of truth, clarity, and comprehensiveness, also undertakes to:

- a) report the data and news in the Company's website pages in line with proper editorial criteria, keeping into account the function of the information that characterises the financial disclosure to investors, without pursuing any promotional objectives;
- b) clearly indicate, in each page of the website, the date and time when the data is updated;
- c) ensure, in case a different language other than Italian is used for the publication of certain news, that the content is identical in both versions, highlighting any differences, where the content is not identical;
- d) publish, as quickly as possible, a rectification highlighting the corrections made, in case of errors in the information published on the website;
- e) always cite the source of the information when publishing data and news generated by third parties;
- f) announce, in the press releases under the applicable statutory regulations, the on-line publication of documents inherent to the events reported in the above-mentioned disclosures, that have not been already made available to the public through alternative dissemination methods;
- g) indicate, with respect to the documents published on the website, whether they are the full version or an excerpt or summary thereof, providing instructions on how to get a hold of the original version of the documents published;
- h) include links to other websites in accordance with the principles of honesty and neutrality, in such a way as to enable users to easily be aware of the site they are currently on;
- i) enable free access to the website, without, including when the website is managed by third parties, making the access to the website conditional to the provision of data or information by the investors, except for normal safety measures.

In compliance with the provisions of Article 3 of Commission Implementing Regulations 2016/1055, furthermore, the Company's website meets the following criteria:

- a) enables users to access the Inside Information published on the website without discrimination and free-of charge;

- b) enables users to access the Inside Information in an easily identifiable section of the website;
- c) ensures that the Inside Information published clearly indicate the date and time of their disclosure and that are presented in chronological order.

10. INSTRUCTIONS TO SUBSIDIARIES

10.1. Instructions In order to enable the Company to comply with the obligations of law pertaining to Inside Information, the Company's subsidiary companies shall:

- i. adopt measures suitable to ensure compliance with the obligations herein detailed;
- ii. identify the information regarding their company that may abstractly be able to be qualified, at a later time, as Inside Information for the Company, and promptly communicate such information to the Corporate Information Controller, together with the names and identification data of the persons with access to such information;
- iii. keep a regular communication channel with the Corporate Information Controller, sending the latter any additional information, enabling the latter to make the evaluations required.

Once the above information is received, the Corporate Information Controller will check whether the information is suitable to be qualified as Relevant or Inside Information, following the steps detailed in this Procedure, and transmitting to the Entity in Charge of the Lists, where required, the names and identification data of the persons having access to the information at issue, for the purpose of adding their names to the RIL or to the Insider List, as appropriate.

10.2. References For the purposes detailed in section 7.5 above, the subsidiary companies adopt confidentiality measures with concern to their own Confidential Information, in accordance and in compliance with the measures put in place by the Company.

11. MARKET SOUNDING

11.1. Concept of Market Sounding and Legal Framework Subject to Corporate Information Controller's prior decision on such regard, the Company may, including through third parties acting in the name and on behalf of the Company, conduct Market Sounding as per Article 11 of the MAR, and under Commission Delegated Regulation (EU) No. 2016/960 of 17 May 2016 and No. 2016959 of 17 May 2016. A Market Sounding consists in the Company's disclosure of information, prior to announcing an operation, for the purpose of assessing the interest of potential investors for a possible operation and the relative conditions, including the potential scope or price thereof, to one or more potential investors (Article 11 of the MAR, hereinafter "**Market Sounding**")

11.2. Procedure. Prior to conducting a Market Sounding, the Company assesses whether the Market Sounding entails the disclosure of Inside Information, recording in writing the conclusions reached on such regard, and the reasons underpinning such conclusions. Such written records are provided on request to the competent authority. The above obligation applies also to any disclosure of Inside Information for the entire

duration of the Market Sounding, updating, as a consequence thereof, the written records at issue.

The Company defines a set of standard information that is exchanged with the person who receives the Market Sounding, before conducting the Market Sounding, in compliance with the provisions of Article 3, paragraphs 3 and 4 of Commission Delegated Regulation (EU) 2016/960 according to whether the Market Sounding entails the disclosure of Inside Information, it being understood that if the Market Sounding actually entails the disclosure of Inside Information, the Company (a) obtains the consent of the person receiving the Market Sounding to receiving Inside Information; (b) informs the person receiving the Market Sounding that they are barred from using such Inside Information, or from making any attempt to use them, through the acquisition or sale, on their own behalf or on behalf of others, directly or indirectly, of any of the financial instruments to which the Inside Information relate; (c) informs the person who receives the Market Sounding that they are barred from using such Inside Information, or from making any attempt to use them, by cancelling or changing an order that has already been submitted concerning a financial instrument to which the Inside Information refer; (d) informs the person receiving the Market Sounding that, by accepting to receive such Inside Information, they are under obligation to keep said Inside Information strictly confidential.

In order to keep the Market Sounding information confidential and reserved, the Company enters into specific confidentiality agreements with the persons who receive such information.

If the Market Sounding is not audio or video recorded, or evidence of the Market Sounding does not show through any correspondence exchanged - where the Company is under obligation to keep such records - but it is carried out in person through meetings with potential investors, the Company must draw up minutes of such meetings. The above minutes must report the information detailed in **Attachments 4A and 4B**, according to whether they (also) concerned any Inside Information.

In any case the Company (or the third party appointed to provide the information within the scope of the Market Sounding) ensures that every person who receives the Market Sounding receives the same level of information.

Where the information provided within the scope of the Market Sounding ceases to qualify as Inside Information, the Company informs the person who received such information, providing the data and information required under the applicable statutory regulations.

12. STORAGE

12.1. Storage of the Documentation The documentation referred to within and/or through this Procedure (and, thus, among others, a copy of the communications held with the persons entered in the Insider List; confidentiality agreements; written evaluations on the nature of corporate information; written decisions on the activation of Disclosure delay procedures; etc.) - with the exception of Market Sounding as indicated in section 12.2 below - is stored by the Legal Department of the Company.

12.2. Storage of Market Sounding The documentation concerning the Market Sounding as per section 11 above (and, thus, the minutes or the evaluations on the content of the Market Sounding as detailed in section 11.2 above) is stored by the Investor Relations Office. The Investor Relations Office is also in charge of drawing up, keeping, and updating a list of the persons to whom the Market Sounding was

submitted, in line with the applicable regulations of law, and a list of the potential investors who decided not to receive the Market Sounding.

13. DATE OF VALIDITY

The provisions of this Procedure enter into effect as of the date of the approval thereof by the Board of Directors.

14. MODIFICATIONS AND ADDITIONS TO THE PROCEDURE

Any substantive modifications and additions to this Procedure are within the scope of competence of the Board of Directors of the Company.

The Chairman of the Board of Directors and the Managing Directors, however, have the faculty to make any modifications or additions of a formal nature to this document, on condition that the content remains unvaried in the substance, or to make modifications dictated by changes in the organization or in the applicable laws and regulations, in which case they will inform the Board of Directors of such changes, and obtain the approval thereof on the first working meeting.

The Legal Department and the Investor Relation Office of the Company monitor the Procedure to ensure that it continues to meet the requirements of solidity and functionality over time; to this end, they present proposals to adjust the Procedure, including in light of best practice or regulatory changes.

15. SANCTIONING PROCEDURE

This Procedure (also) represents the set of measures referred to in the 231 Organization Model of the Company: the breach of the provisions herein contained shall entail the breach of the measures provided under the Model, and may be consequently subject to sanctions pursuant to and by effect of the provisions of the Model.

16. DISSEMINATION OF THE PROCEDURE

A copy of this Procedure is given to the Directors, the Auditors, the managers, and the employees of the Company.

This Procedure is also published on the Company's website in the Investor Relations section, in the Company's intranet, and is displayed on notice boards.

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Attachments

1. Attachment 1 Notice Form to inform Consob of Disclosure Delay Procedure
2. Attachment 2 Communication of registration in the Insider List
3. Attachment 3 Communication of removal from the Insider List

4. Attachments 4A and 4B: Market Sounding: information to be included in meeting minutes

Attachment 1

NOTICE FORM TO INFORM CONSOB ON THE DISCLOSURE DELAY PROCEDURE

Send via Certified E-Mail (PEC) to consob@pec.consob.it, “Markets Division” indicating in the subject line “MAR disclosure delay”.

Re:	MAR - Inside Information Disclosure Delay - Saes Getters S.p.A.
Issuer	Saes Getters S.p.A.
Notifier	<i>[name, surname, capacity]</i>
Notifier Contact Data	<i>[email address]</i> <i>[work phone number - landline]</i> <i>[work phone number - mobile]</i>
Identification of the Inside Information which disclosure is being delayed	<i>[Title of the Press Release]</i> <i>[Reference Number in the system used for disclosure]</i> <i>[date and time of Press Release]</i>
Decision to delay the disclosure of the Inside Information	<i>[date and time of the decision to delay the Press Release]</i>
Names of the persons responsible for the decision to delay the disclosure	<i>[Names of all the persons responsible for the decision to delay the Press Release]</i>

<p>Explanation of how the conditions enabling the delay are met.</p>	<p><i>[Summary explanation of how the three conditions required for delay are met: a) the immediate disclosure would likely harm the Company's legitimate interests; b) the disclosure delay would likely not have the effect of misleading the public; c) the Company can guarantee the confidentiality of the Inside Information]</i></p>
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ATTACHMENT 2

ON SAES GETTERS S.P.A. LETTERHEAD

Dear Sirs/Ms/Mr.
[●]
[ADDRESS]
[TOWN OR CITY]

[Place], [Date]

Re: Registration in the Insider List

Dear Ms/Mr [●],

we are writing to inform you that we have entered your name [or the name of your company/partnership] in the Insider List, created by this Company pursuant to Article 18 of Regulation (EU) 596/2014 No. 596/2014 of the European Parliament and of the Council and Article 25 of Legislative Decree 58/1998 effective as of [day] [●] at [time] [●].

We specifically refer to the information you have access to respecting [●].

We wish to inform you that such information [effective as of [time] [●] of [day] [●] has been qualified as Inside Information under the laws and regulations currently in force (hereinafter, the "**Inside Information**") pursuant to the applicable laws and regulations.

We invite you to read (again) our Procedure concerning the management of Inside Information, available on the Company's website at www.saesgetters.com to obtain any information on such regard.

We also wish to remind you of the importance of keeping such Information strictly and fully confidential, of the prohibition of disseminating such Information, and of the prohibition to use such Information, including through third parties, for the purpose of trading the Company's financial instruments, until the Information has entered the public domain.

Please remember that any violation of the above and of the obligations of law with respect to Inside Information entails the crimes listed under Legislative Decree No. 58/1998. In particular, sanctions are applicable to anyone who: (a) buys, sells, or

carries out any other transaction, directly or indirectly, on their own account or on account of third parties, using financial instruments using the above Information; (b) discloses such Information to others, outside the normal performance of their work, profession, function, or office; (c) advises or induces others, based on the above Information, to carry out any of the transactions listed under letter (a).

Please remember that for the purpose of determining the commission of so-called market abuse offences, whether or not the Company qualified the information as Inside Information when such actions are carried out shall not be a determining factor.

[For such purposes, we ask you to provide the data below, required for your registration in the List.] On this regard, please note that your data will be handled in compliance with the provisions of Legislative Decree No. 196/2003 (the "Privacy Code").

Saes Getters S.p.A.

(signature)

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ATTACHMENT 3

ON SAES GETTERS S.P.A. LETTERHEAD

Dear Sirs/Ms/Mr.
[●]
[ADDRESS]
[TOWN OR CITY]

[Place], [Date]

Re: Removal from the Insider List

Dear Ms/Mr [●],

we are writing to inform you that we have removed your name [or the name of your company/partnership] from the Insider List, a list created by this Company pursuant to Article 18 of Regulation (EU) 596/2014 No. 596/2014 of the European Parliament and of the Council and Article 25 of Legislative Decree 58/1998, effective as of [time] [●] of [date] [●].

The Procedure concerning the management of Inside Information remains available on the Company's website at www.saesgetters.com to obtain any information on such regard.

Your personal details and data will be handled in compliance with the applicable Law.

Saes Getters S.p.A.

ATTACHMENT 4A

Information to be included in Market Sounding meetings' minutes or reports, (also) pertaining to Inside Information.

Item	Detail
i. Name of the market participant who discloses the information	<i>Full name of the market participant who discloses the information, and full name of the person who, within the market participant's organization, provides the information, and address used for the communication.</i>
ii. Name of the person who receives the communication (the "Approached Party ")	<i>Full name of the person who receives the communication, and address used for the communication.</i>
iii. Date and time of the communication	<i>Date and time (or times) of the communication, indicating the time zone.</i>
iv. Details on the nature of the conversation, pursuant to Article 3, paragraph 3, letter a) of Commission Delegated Regulation (EU)	<i>Record of the declaration specifying that the communication is for the purpose of Market Sounding.</i>
v. Confirmation of the identity of the Approached Party, pursuant to Article 3, paragraph 3, letter c) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the information respecting the confirmation provided to the Approached Party on the fact that the market participant who discloses the information is talking to the person appointed by the potential investor to receive the Market Sounding.</i>
vi. Details, pursuant to Article 3, paragraph 3, letter d) of Commission Delegated Regulation (EU) 2016/960 on the fact that the information disclosed qualifies as inside information.	<i>Record of the declaration specifying that, if the Approached Party accepts to receive the Market Sounding, they will receive information which, in the opinion of the market participant communicating such information, qualify as inside information, and reference to the obligation provided under Article 11, paragraph 7, of Regulation (EU) 596/2014.</i>
vii. Information on the estimated time when the information shall cease to qualify as inside information, pursuant to Article 3, paragraph 3, letter e), of Commission Delegated Regulation (EU) 2016/960.	<i>Record on the information provided, if any, on the estimate time when the information will be made public, or the operation will be started, with explanation of the reasons for which the estimated time may vary, and of the manner in which the Approached Party shall be informed in the event the estimated time no longer applies.</i>
viii. Declaration on the obligations of the Approached Party, pursuant to Article 3, paragraph 3, letter f) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the declaration informing the Approached Party on the obligations applicable to the possession of inside information under Article 11, paragraph 5, first heading, letters b), c), and d), of Regulation (EU) No. 596/2014.</i>
ix. Confirmation of consent, under Article 3, paragraph 3, letter g) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the information concerning the consent granted by the Approached Party to receive inside information under Article 11, paragraph 5, first heading, letter a), of Regulation (EU) No. 596/2014 (request and reply).</i>

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x. Communication of the information provided under Article 3, paragraph 3, letter h) of Commission Delegated Regulation (EU) 2016/960.	<i>Description of the information provided for the purpose of market sounding, with indication of the information qualified as inside information.</i>
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ATTACHMENT 4B

Information to be included in Market Sounding meetings' minutes or reports, not (also) pertaining to Inside Information.

Item	Detail
i. Name of the market participant who discloses the information	<i>Full name of the market participant who discloses the information, and full name of the person who, within the market participant's organization, provides the information, and address used for the communication.</i>
ii. Name of the person who receives the communication (the "Approached Party ")	<i>Full name of the person who receives the communication, and address used for the communication.</i>
iii. Date and time of the communication	<i>Date and time (or times) of the communication, specifying time zone.</i>
iv. Details on the nature of the conversation, pursuant to Article 3, paragraph 4, letter a) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the declaration specifying that the communication is for the purpose of market sounding.</i>
v. Confirmation of the identity of the Approached Party, pursuant to Article 3, paragraph 4, letter c) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the information respecting the confirmation provided to the Approached Party on the fact that the market participant who discloses the information is talking to the person appointed by the potential investor receiving the market sounding.</i>
vi. Specification, pursuant to Article 3, paragraph 4, letter d) of Commission Delegated Regulation (EU) 2016/960 that the information disclosed qualifies as inside information.	<i>Record of the declaration specifying that, if the Approached Party accepts to receive the market sounding, they will receive information which, in the opinion of the market participant communicating such information, qualifies as inside information, and reference to the obligation provided under Article 11, paragraph 7, of Regulation (EU) 596/2014</i>
vii. Confirmation of consent, under Article 3, paragraph 4, letter e) of Commission Delegated Regulation (EU) 2016/960.	<i>Record of the information concerning the consent granted by the Approached Party to proceed with the market sounding (request and reply).</i>
viii. Communication of the information provided under Article 3, paragraph 4, letter f) of Commission Delegated Regulation (EU) 2016/960.	<i>Description of the information disclosed for the purpose of market sounding.</i>