



**Procedure for the Internal Management
and Public Disclosure of
Inside Information**

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REGULATORY FRAMEWORK

For the purposes of this procedure (the “**Procedure**”), the following regulatory framework has been taken into account:

- Regulation (EU) No 596/2014 of the European Parliament and of the EU Council of 16 April 2014 on market abuse (Market Abuse Regulation– hereinafter “**MAR**”);
- The Commission Implementing Regulation (EU) 2016/1055 of 29 June 2016 (“**TTS 1055**”);
- Legislative Decree. 58/1998, as amended (the “**TUF**”);
- “*MAR Guidelines – Delay in the disclosure of inside information*” published by ESMA (*European Securities and Markets Authority*) and implemented by Consob, which also made them available on its institutional website (“**ESMA Guidelines on Delay**”);
- Guideline n. 1/2017 regarding “Management of inside information” adopted by Consob on 13 October 2017 (the “**Guidelines**”).

This Procedure shall be applied and interpreted in compliance with ESMA - *European Securities and Markets Authority* Guidelines (including *Questions and Answers on the Market Abuse Regulation*, prepared and updated by ESMA, in the last version available on its institutional website) and by Consob, within their respective jurisdiction.

FOREWORD

This procedure (the “**Procedure**”) was adopted by DiaSorin S.p.A. (the “**Company**” or the “**Issuer**”) in compliance with provisions contained in Article 17 of the MAR and in ITS 1055, and contains instructions and procedures relating to both the internal management and the external disclosure of Inside Information and Confidential Information (both as defined hereinafter) regarding the Issuer and its subsidiaries, pursuant to art. 93 of the TUF (the “**Subsidiaries**” jointly referred to as the “**Group**”).

The procedure is aimed at (i) ensuring compliance with the current laws and regulations on the subject and (ii) guaranteeing maximum secrecy and confidentiality in handling Inside Information and Confidential Information; the Procedure, in particular, is aimed at ensuring greater transparency towards the market and appropriate preventive measures against market abuse and, specifically, against abuse of Inside Information.

The following persons, with different levels of responsibilities and fulfilments, are required to comply with this Procedure: Directors, Auditors, General Managers (where appointed), Executive Directors, Company's and/or Group companies' employees, as well as "external" collaborators listed in the "*Register of persons having access to Inside Information*" (the “**Insider Register**”) that for any reason have similar access to Inside Information (and/or Confidential Information) concerning the Issuer and its Group (hereinafter jointly referred to as “**Recipients**”). The Insider Register is governed by the procedure called "*Procedure to manage the Register of Persons having access to Inside Information*" adopted by the Company and available on the website of DiaSorin S.p.A (the "**Insider Register Procedure**").

This Procedure does not cover dealing with commercial or advertising information which, pursuant to the Procedure is not classified as Confidential Information and which is, thus, disseminated with modalities different from those covered by this Procedure.

The provisions of this Procedure, in effect since July 3, 2016, were subsequently updated by a resolution of the Board of Directors of DiaSorin S.p.A. [March 14, 2019]; such updates became effective from that date. Any subsequent amendments and/or integrations shall enter into force on the day the Procedure is posted on the company website, or on any other date required pursuant to the provisions of laws and regulations or by a resolution of the Board of Directors or, in urgent cases, by the Chairman of the Board of Directors or by the Chief Executive Officer.

1. GENERAL PRINCIPLES

1.1 Definition of Inside Information

For the purposes of this Procedure and in accordance with the provisions of Article 7 of the MAR, the expression “*inside information*” shall mean information of a precise nature, which has not been made public concerning, directly or indirectly, the Company or one or more financial instruments 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 (“**Inside Information**”).

Pursuant to and for the purpose of Article 7, paragraph 2 of the MAR, information shall be deemed to be of a “*precise nature*” if it indicates a set of circumstances which exist or which may reasonably be expected to come into existence, or an event which existed or which may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument.

In this respect, in case of a protracted process that is intended to bring about, or that results in particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

An intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria as referred to in this Article.

The expression “*information which, if it were made public, would be likely to have a significant effect on the prices of financial instruments, derivative financial instruments (...)*” shall mean information a reasonable investor would be likely to use as part of the basis of his or her investment decisions.

1.2 Information that directly or indirectly concerns the Issuer

The Issuer shall inform the public as soon as possible of Inside Information, which directly concerns the Issuer.

As provided in the Guidelines, the Issuer shall not make public information that indirectly concerns the Company, such as that originating from sources outside the Company even though it might affect the prices of the financial instruments issued by the Company¹.

¹ Paragraph 4.2.1 of the Guidelines.

The Guidelines provide (i) a non-exhaustive list of examples of Inside Information which could directly involve an issuer and (ii) examples of information which concern indirectly the issuer; such lists are both provided in Annex “A” of the Procedure, to which reference is made.

The Guidelines explains that following the publication of information that indirectly concerns the Company, it is possible that Confidential Information (as defined in paragraph 4.1 below) not considered Inside information by the Company may become so; the Guidelines provides a list of examples that are provided in Annex “A” of the Procedure, to which reference is made.

The Issuer must inform the public of the information concerning its subsidiaries if this represents Inside Information for the Issuer.

To fulfil this obligation, the Subsidiaries shall transmit in a timely manner to the Issuer the required information in order to comply with the instructions received from the Issuer, pursuant to art, 144, section 2 of the TUF.

2. HANDLING OF INSIDE INFORMATION

The Issuer shall inform the public as soon as possible of Inside Information, which directly concerns the Issuer, under the terms and procedures contained in paragraph 2.2. below.

When informing the public of Inside Information, the Issuer shall ensure that the disclosure is provided (i) in a manner to enable fast and free-of-charge access and on a non-discriminatory basis ensuring effective disclosure throughout the European Union simultaneously, as well as complete, correct and timely assessment of Inside Information by the public and, in any case, (ii) in compliance with ITS 1055; all in accordance with the provisions of Article 2 of the Procedure.

Pursuant to article 17, paragraph 8 of the MAR, when the Issuer - or person acting on its behalf or for its account-, discloses any Inside Information to any third party in the normal course of the exercise of an employment, profession or duties, it has the obligation to make complete and effective public disclosure of that information, simultaneously in the case of an intentional disclosure, and promptly in the case of a non-intentional disclosure, unless the person receiving the information owes a duty of confidentiality, regardless of whether such duty is based on a law, on regulations, on articles of association, or on a contract.

The Company may delay, under its responsibility, the public disclosure of Inside Information (the "**Delay**") upon occurrence of the conditions set out in Article 3 of the Procedure.

2.1 Assessing the Inside nature of Information.

Assessing the Inside nature of Information and, thus, disclosing it to the market pursuant to this article (or, in response to conditions established by current regulations on the right to activate the Delay procedure as set forth in Article 3), is carried out in a timely manner taking into account characteristics of Inside Information as referred to in article 1 of the Procedure, as set out below.

The Chief Executive Officer (or the Chairman of the Board of Directors if the Chief Executive Officer is absent or unable to attend) after consulting, if necessary, the current Head of Corporate Legal Affairs shall be in charge of assessing if the information is found to qualify (or not) as Inside Information. The Chief Executive Officer, when deemed appropriate or necessary, (or the Chairman of the Board of Directors when the Chief Executive Officer is absent or unable to attend) may defer the assessment to the Board of Directors, which must then meet in the shortest possible time.

If, following the assessment, the Chief Executive Officer or the Chairman of the Board of Directors when the Chief Executive Officer is absent or unable to attend:

- (a) recognizes the information does not qualify as Inside Information, he/she shall ensure, if necessary, the confidentiality of information in any case, in accordance with the provisions of article 4 of the Procedure;
- (b) recognizes the information qualify as Inside information, he/she shall ensure the Inside Information is disclosed to the public according to the provisions of paragraph 2.2 of the Procedure, unless the conditions to activate the Delay procedure referred to in article 3 are met.

In the latter case, the Chief Executive Officer shall immediately inform the Designated Officer of managing the Insider Register so that he/she shall: (i) set up a special Single Section for the Inside Information in question and use it to register persons who have access to that Inside Information ; and (ii) notify the persons entered in the relevant Section of the need to ensure the confidentiality of that information through scrupulous compliance with the rules of conduct described in article 4.1 (where applicable).

For the information that unexpectedly becomes Inside Information, the assessment referred to in paragraph 2.1 is carried out as quickly as possible, after establishing that the information represents Inside Information ².

2.2 Public disclosure of Inside Information.

As stated above, the Issuer ensures that the public disclosure is provided (i) in a manner to enable fast and free-of-charge access and on a non-discriminatory basis ensuring effective disclosure throughout the European Union simultaneously, as well as complete, correct and timely assessment of Inside Information by the public and, in any case, (ii) in compliance with ITS 1055 and (iii) as well as in compliance with the provisions of this Procedure and with laws and regulations currently in force. In each case, the Company does not combine public disclosure of Inside Information with the marketing of its activities.

Public disclosure of Inside Information shall occur, as soon as possible, through a press release drawn up by the Issuer, as hereinafter provided, in compliance

² Paragraph 6.1.2 of the Guidelines.

with press release schemes contained in the Instruction to the Regulations of the Markets organized and managed by Borsa Italiana S.p.A., as applicable.

The Investor Relations and the Corporate Legal Affairs Functions draw up jointly the draft of the press release allowing these functions, for the areas within their competence, to assess the merit, content and compliance with the drafting *criteria* of the press release.

After preparing the draft of the press release, it shall be submitted to the Chief Executive Officer or to the Chairman of the Board of Directors if the Chief Executive Officer is absent or unable to attend and, if deemed appropriate or necessary, to the Board of Directors for final approval subject to the prior attestation by the Corporate Accounting Documents Officer (the “**Designated Officer**”) when the text contains accounting information, pursuant to and for the effects of article 154-*bis* of TUF.

As provided in the guidelines³:

- a) The disclosure must take place within the time frame required for the drafting of the press release so that the public can make a complete and correct evaluation of the Information, and for its subsequent transmission to the SDIR system which the Group uses to transmit the *Regulated Information* (the “**SDIR**”)⁴;
- b) Any internal organisational problems, such as the absence of deputies for the persons who are required to take the decision or supervise the dissemination of the communication, cannot justify the extension of the said time frame;
- c) In order to enable Consob and the market management company to promptly perform their respective supervisory duties, the Company gives advance notice to Consob, also by informal and early warning, that the Company may publish important Inside Information while the financial instruments are being traded. Similar notice is given to the market management company in compliance with market rules.

The Investor Relations Function or, on its behalf, the Corporate Legal Affairs Function issue the press release to the SDIR system, which through the SDIR itself, is transmitted to Consob, to Borsa Italiana S.p.A. and to the press agencies connected to the system⁵.

³ Paragraph 7.1 of the Guidelines.

⁴ If the information becomes Inside Information on a Friday after the closure of the markets, in order to establish the correct timescale for disclosure, the issuer does not take account of the fact that the markets will be closed over the weekend. This also takes into consideration that OTC transactions may be concluded (see Paragraph 7.1.6 of the Guidelines).

⁵ Pursuant to Art. 2, par. 1, lett. b), of ITS 1055 “*Issuers (...) shall disclose inside information using technical means that ensure: (...) (b) inside information is communicated, directly or through a third party, to the media which are reasonably relied upon by the public to ensure its effective dissemination. That communication shall be*

The press release is considered public as soon as confirmation has been received by the SDIR system. In the cases of operational failures and/or service interruption of the SDIR service, the disclosure requirements vis-à-vis Borsa Italiana S.p.A. shall be fulfilled using the e-mail address provided in the Instructions to the Regulations of the Markets organized and managed by Borsa Italiana S.p.A.⁶.

In each case the Issuer shall ensure the completeness, integrity and confidentiality of the Inside Information by promptly remedying any failure or disruption in the communication of the information. The press release is also sent to the authorized storage mechanism used by the Company to keep Regulated Information.

The Investor Relations function shall be in charge of verifying the press release is posted on the Company's website by the company departments in charge thereof, ensuring (i) a non-discriminatory and free-of-charge access; (ii) the Inside Information is published in a section of the website easily identifiable; (iii) details of date and time of disclosure of Inside Information and that Information is organized in chronological order; all in accordance with the principles referred to in article 4, where applicable.

The Company shall, for at least five years, maintain on its website all Inside Information it is required to disclose publicly.

Disclosure of information during meetings, meetings with the media and with representatives of trade unions

Disclosure of Inside Information during a Shareholders' Meeting of the Issuer imposes the obligation to publicly disclose this Information according to the procedures set forth in article 2.2.

Should the Issuer or a Group's company organize or attend meetings with financial analysts, institutional investors or other financial market operators, the Investor Relations Function shall:

- (a) communicate in advance to the Consob and to the market management company the date, place and topics of the meeting;
- (b) transmit to Consob and to the market management company, through the SDIR system or through the alternative manners established by the competent Authority, the documentation made available to the participants at the meeting, at the latest at the meeting;

transmitted using electronic means that ensure that the completeness, integrity and confidentiality of the information is maintained during the transmission, and it shall clearly identify: i) that the information communicated is inside information; ii) the identity of the issuer or emissions allowance market participant: full legal name; iii) the identity of the person making the notification: name, surname, position within the issuer or emission allowance market participant; iv) the subject matter of the inside information; v) the date and time of the communication to the media".

⁶ The Instructions to the Regulations of the Markets organized and managed by Borsa Italiana S.p.A. require, in such case, the press release to be sent to the e-mail address: info.lcs@borsaitaliana.it.

- (c) extend the meeting also to members of the financial press, or, where that is not possible, publish a press release illustrating the main topics discussed⁷, in the manner envisaged in paragraph 2.2

It is understood that, during these meetings, the Company shall not disclose Inside Information to the participants, unless this is disclosed to the public in the manner described in paragraph 2.2, at the same time in the case of intentional disclosure and in promptly manner in the case of unintentional disclosure.

If the Issuer attends meetings with representatives of the trade unions during which data on company perspectives are analysed, if delegations of the organizations have not assumed any restrictions of confidentiality⁸, the Issuer shall disclose any Inside Information addressed therein.

3. DELAYED DISCLOSURE OF INSIDE INFORMATION

3.1 Conditions for the Delay

The company may delay, under its responsibility, the public disclosure of Inside Information, provided that the following conditions are met (“**Conditions for the Delay**”):

- (a) immediate disclosure is likely to prejudice the legitimate interests of the Issuer;
- (b) delayed disclosure is not likely to mislead the public;
- (c) the Issuer is able to ensure the confidentiality of that information.

In case of a protracted process that occurs in several steps and is intended to bring about, or that results in particular circumstances or a particular event, the Company may, under its responsibility, delay the disclosure of Inside Information concerning this process, provided that the Conditions for the Delay are met and kept, as provided below.

3.2 Procedure to activate the Delay in the public disclosure of Inside Information

As provided in article 2.1. above, the assessment regarding the power to delay public disclosure of Inside Information is carried out on a case-by-case basis, under the direct responsibility of (i) the Chief Executive Officer or under the responsibility of the Chairman of the Board of Directors if the Chief Executive Officer is absent or unable to attend or (ii), if deemed appropriate or necessary, under the responsibility of the Board of Directors.

To this end, (i) the Chief Executive Officer or the designated substitute, as referred above, if the Chief Executive Officer is absent or unable to attend, or

⁷ Paragraph 7.9.1 of the Guidelines.

⁸ Paragraph 6.5.8 of the Guidelines.

(ii), if deemed appropriate or necessary, the Board of Directors verifies that the Conditions for the Delay are fulfilled, taking also into account the provisions of the ESMA guidelines on the Delay and fills out the relevant form, prepared according to the model under Annex “B” (Section I and II) of this Procedure.

Having verified the Conditions for the Delay are met, he/she shall file at the Corporate Legal Affairs office the aforementioned form and any other documents on the basis of which the assessment was carried out and that state the reasons for the Delay. These documents shall provide all the elements required by ITS 1055 for the evidence and notification of the Delay, as specified below

For the Delay of Inside Information disclosure, the Issuer shall make use of technical means that ensure the accessibility, readability and maintenance on a durable medium of the information required under article 4, paragraph 1 of ITS 1055, as provided below:

(A) date and time: **(i)** the first existence of the Inside Information at the Issuer; **(ii)** the decision to delay the disclosure of Inside Information; **(iii)** the probable disclosure of the Inside Information by the Issuer;

(B) the identity of the persons at the Issuer who are responsible for: **(i)** the decision to delay the disclosure and the decision establishing the start of the Delay period and its probable end; **(ii)** the steady monitoring of the Conditions for the Delay; **(iii)** the decision to publicly disclose the Inside Information; **(iv)** the disclosure of the requested information about the Delay and the written explanation to the competent Authority;

(C) evidence of the initial fulfilment of the Delay Conditions and of any change occurring in this regard, during the Delay period, including: **(i)** protective barriers of both internal and external information to prevent access to Inside Information by persons other than those who require it for the normal exercise of their employment, profession or duties within the Issuer; **(ii)** arrangements to disclose Inside Information as soon as confidentiality is no longer ensured.

The Chief Executive Officer or the designated substitute, as referred above, if the Chief Executive Officer is absent or unable to attend - without prejudice to the provisions of article 4 paragraph 1 of ITS 1055 as referred to in letter (a) above – takes any appropriate measure, in the particular case and taking into account the type on Inside Information and its electronic and/or paper format, to ensure the confidentiality of the delayed Inside Information and the maintenance of its confidentiality, all in compliance with the art. 4 of the Procedure. To this end, he/she shall promptly inform the Designated Officer in charge of the Insider Register about the activation of the Delay procedure, in order that the Designated Officer can: (i) establish a special Single Section concerning the Inside Information and list persons having access to Inside Information in the aforementioned Section; and (ii) inform persons listed in the Single Section and in the Permanent Section about the activation of the Delay procedure and the need to ensure confidentiality of the Information through strict compliance with

rules of conduct described in article 4.1 (where applicable).

The Issuer shall adopt a set of measures (barriers) to segregate the Inside Information, in order to avoid access to Inside Information by subjects (internal or external to the company) that should not access it in their normal work activities or office, that is, subjects who do not need to know the Inside Information⁹.

3.3 Behaviour of the Issuer during the Delay

- (a) During the Delay, the Chief Executive Officer or the designated substitute, if the Chief Executive Officer is absent or unable to attend, verifies case by case with the support of the person indicated in the documents filed pursuant to paragraph 3.2, the permanence of the Conditions for the Delay and, particularly, the confidentiality of the Inside Information whose disclosure has been delayed.

The Issuer also draws up in advance a draft of the public disclosure to be issued in the event that monitoring reveals that the Conditions for its Delay no longer pertain¹⁰.

If it is proved that even one of the Conditions of the Delay has ceased to exist (i) the Inside Information shall be publicly disclosed as soon possible, in the manner provided in article 2 of this Procedure and (ii) immediately after the public disclosure the Company shall provide the notification referred to in paragraph 3.4 below.

The confidentiality of information ceases to exist even when a rumour explicitly relates to Inside Information the disclosure of which has been delayed, when that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured (as per article 17, paragraph 7 of the MAR).

- (b) If the Issuer has a treasury shares buyback programme (the “**Buyback Program**”) underway, pursuant to Article 5 of the MAR, following the decision to delay the disclosure of the Inside Information, the Corporate Legal Affairs of the Issuer, which is responsible for treasury shares buyback matters, acknowledges the absence of the conditions to be able to operate while benefitting from the exemption envisaged by the MAR (see Article 4, paragraph 1, letter c) of Delegated Regulation (EU) 2016/1052)¹¹ until the closure of the Delay procedure, unless conditions to continue the Buyback occur, as provided in article 4, paragraph 2 of the Delegated Regulation¹².

⁹ Paragraph 5.1.2. of the Guidelines.

¹⁰ Paragraph 6.7.2 of the Guidelines.

¹¹ It being understood the possibility for the Issuer to continue the Buyback programme by adopting the measures indicated in Article 4, Paragraph 2 and 4 of the Delegated Regulation (EU) 2016/1052.

¹² Paragraphs 6.6.2 and 6.8.4 of the Guidelines.

- (c) During the Delay, the Issuer does not disclose information that is not consistent with those subject to the Delay¹³.

3.4 Notification of the Delay

When the disclosure of Inside Information has been delayed pursuant to this Article 3, the Chief Executive Officer immediately after the Inside Information has been publicly disclosed, shall notify the relevant Authority of this Delay (according to the manner established by the Authority) and provide in writing the information required by ITS 1055, sending to CONSOB the form referred to in Annex “B” by certified e-mail to the email address consob@pec.consob.it¹⁴.

Pursuant to article 4, paragraph 4 of ITS 1055, the notification of the Delay to Consob shall include the following information:

- (A) the identity of the Issuer: full trading name;
- (B) the identity of the notifier: name, surname, position within the Issuer;
- (C) contact details of the notifier: professional e-mail address and phone number;
- (D) identification of the Inside Information affected by the Delay in disclosure:
 - (i) title of the disclosure announcement;
 - (ii) the reference number where the system used to disseminate the Inside Information assigns one;
 - (iii) date and time of the public disclosure of the Inside Information;
- (E) date and time of the decision to delay the disclosure of Inside Information;
- (F) the identity of all those responsible for the decision to delay the public disclosure of Inside Information.

Should Consob so request, an explanation of the manner in which the Conditions for the Delay have been met shall be sent to the Authority through the form under Annex “B” (Section II).

Notification is not due if, after the decision to delay the disclosure, the information is not publicly disclosed because it has lost its inside nature ¹⁵.

4. GENERAL PRINCIPLES OF THE DISCLOSURE OF INFORMATION CONCERNING THE ISSUER

4.1 Confidential Information

For the purposes of this Procedure, the expression “*confidential information*”

¹³ Paragraph 6.4.2 of the Guidelines

¹⁴ It is necessary to specify “Market Division” as recipient’s name and indicate “MAR Delay in the Disclosure” in the subject field.

¹⁵ Paragraph 6.8.2 of the Guidelines.

means information or news that is not qualified as Inside Information concerning the Issuer and/or a Group companies and that is not in the public domain and for its subject and characteristics has a reserved nature, acquired by Recipients in carrying out their tasks and/or functions (“**Confidential Information**”).

The Issuer limits and controls access to the Confidential Information ensuring the organisational, physical and logical security of the same, including through the structuring of different access levels, the protection of the related IT supports (keywords, cryptography, etc.) and the imposition of limits on the circulation of data and documents¹⁶.

The Recipients in possession of Confidential Information are required to:

- (a) maintain the confidentiality of all documents and information while performing their tasks;
- (b) use the confidential information and documents exclusively in the performance of their functions;
- (c) strictly comply with provisions of this Procedure in case where the Confidential Information is later qualified as Inside Information.

Each Recipient is personally responsible for retaining any Confidential Information that comes into his/her possession. Documentation concerning Confidential Information shall be kept by Recipients, even if in electronic format, in order to allow access only to authorized persons. If Recipient is required to transmit confidential document or information to third parties, in the normal exercise of his/her professional work or function, he/she shall verify that the person receiving the information owes a duty of confidentiality towards documents and information received, regardless of whether such duty is based on a law, on regulations, on articles of association, or on a contract.

All Recipient’s relations with the press and other means of communication aimed at disclosing Confidential Information shall take place solely through the Investor Relations Function, following authorization from the Chief Executive Officer. In any case, if documents and information contain references to economic, asset, financial, investment, staff deployment data or similar, this data must first be validated by the Designated Officer.

It is understood that (i) provisions under article 4.1 shall apply to Inside Information when required, to ensure, in the particular case, confidentiality of information and (ii) public disclosure of Inside Information shall comply with article 2 of the Procedure.

¹⁶ Paragraph 3.4.1 of the Guidelines.

In the presence of Confidential Information that could soon reasonably acquire an inside nature, the Issuer, before deciding on the inside nature of the information, assesses whether the conditions exist for possibly activating the Delay procedure referred to in Article 3 of the Procedure¹⁷.

Disclosure of Information through the Issuer's website

In order to ensure correct information is given to investors, the Issuer shall take into account the following criteria when using its website:

- i) report the data and news according to adequate editorial criteria, avoiding, in particular, the pursuit of promotional purposes;
- ii) report in plain text, on each internet page, the date and time of updates to information;
- iii) ensure that the content of the documents written in English is the same as that of the documents written in Italian, highlighting, if this is not the case, any differences and without prejudice to the fact that the Italian version remains the reference text;
- iv) disseminate, as soon as possible, a correction text in which the corrections made are highlighted, in the case of errors contained in the information published on the website;
- v) always cite the source of information when publishing any data or information produced by third parties;
- vi) make reference in the press release of any publication on the website of documents relating to events reported in the press release;
- vii) make the documents available to the public through the internet, preferably in their full version, or ensure that any summary faithfully reflects the information framework of the original document;
- viii) indicate, with regard to the documents published on the website, whether this is the full version, or an extract or a summary, explaining, in any case, the procedures for the retrieval of documents in their original format;
- ix) make any references to other websites on the basis of principles of correctness, neutrality and transparency, so as to allow the user to easily understand in which other website he/she is located;
- x) indicate the source and the actual time of data collection on quotations and the quantities traded of any financial instruments reported;

¹⁷ Paragraph 6.1.1 of the Guidelines.

xi) allow free access to the site avoiding, even in the event that the management of the pages is carried out by third parties, access being conditional on the prior communication of data and news from investors;

xii) in the discussion forums with investors, observe the utmost caution in interventions in order not to alter the information parity.

The Company, in order to ensure a correct and complete information to shareholders, shall follow any recommendations made on the matter by the competent Authority.

The same principles aimed at correct information apply, insofar as they are compatible, to the internet sites of the other Group companies, for which the respective companies are responsible.

5. AMENDMENTS AND INTEGRATIONS

5.1 The provision of this Procedure shall be updated and/or integrated by and under the responsibility of the Issuer's Board of Directors, taking into account all applicable provisions of laws and regulations and the implementation experience and market practices that will be developed in this area.

5.2 Should it be necessary to update and/or integrate individual provisions of this Procedure in response to changes in the applicable provisions of laws and regulations, or due to specific requests received from regulatory authorities, and in cases of demonstrable urgency, this Procedure may be amended and/or integrated by the Chairman of the Board of Directors or the Chief Executive Officer, but the amendments and/or integrations shall be ratified by the Board of Directors at its next meeting.

Annex "A": Illustrative and non-exhaustive list of examples of types of Inside Information

Annex "B": Form for the activation and notification of the Delay

ANNEX A

ILLUSTRATIVE AND NON-EXHAUSTIVE LIST OF EXAMPLES OF TYPES OF INSIDE INFORMATION WHICH COULD DIRECTLY AFFECT THE ISSUER AND EXAMPLES OF INFORMATION THAT INDIRECTLY CONCERN AN ISSUER

A. Illustrative and non-exhaustive list of examples of types of Inside Information which could directly involve the Issuer.

Information relating to:

- Ownership structure
- Composition of management
- Management incentive schemes
- Activities of auditors
- Capital operations
- Issuance of financial instruments
- Characteristics of financial instruments issued
- Acquisitions, mergers, demergers, etc.
- Restructuring and reorganization
- Operation on financial instruments, buybacks and accelerated book-building
- Creditor proceedings
- litigation
- revocation of bank credits
- write-down / write-up of assets or financial instruments held in portfolio
- patents, licenses, trademarks, etc.
- insolvency of significant debtors
- destruction of or damage to uninsured assets
- purchase or sales of assets
- operating performance
- changes in expected financial results (profit warning and earning surprise)
- receipt or cancellation of substantial orders
- entry to (or exit from) markets
- modification to investment plans
- dividend distribution policies
- for bank institutions, information that the issuer learns from supervisory authority as part of the Supervisory Review and Evaluation Process (SREP) carried out in accordance with Art. 97 of Directive 2013/36/EU (CRD IV).

B. Illustrative and non-exhaustive types of information which concern indirectly the Issuer.

Information relating to:

- Data and statistics issued by public institutions
- Coming publications of rating agencies' reports
- Coming publications of financial analysts' investment research
- Investment recommendations and suggestions on the value of financial instruments
- Central bank decisions on interest rates
- Government decisions on tax, sector regulation, debt management, etc.
- Decisions by public authorities and local government
- Decisions on changes to the rules that define market indices and on their composition in particular
- Decisions on the microstructure of trading venues: e.g. changes in the market segment in which an issuer's shares are traded or changes to the trading procedures or changes to market maker or trading conditions
- Decisions by supervisory or antitrust authorities.

C. Non-exhaustive list of information which concern indirectly the Issuer following the publication of which it is possible that the significant information that was not considered Inside Information by the Issuer assumes such nature.

If the Government adopts a measure that could benefit, under some conditions, companies of the sector in which the Company operates, the Company could be the only one to know whether it already meets the conditions set and the magnitude of the benefit.

If the consensus of the financial analysts increases the valuation of the Company on the basis of situations, facts, data or expectations that the Company, however, knows not to be grounded, this information could become Inside information.

If the manager of a stock market index includes in this index the financial instruments of the Company, the latter does not issue a press release, as the information concerns it only indirectly, unless the information has a specific impact on the financial instruments of the Company that is not already known to the market.

ANNEX B

FORM FOR THE ACTIVATION AND NOTIFICATION OF THE DELAY

* * *

[on Company letterhead]

DELAY IN DISCLOSING INSIDE INFORMATION TO THE PUBLIC

[Note: Section I and II of this document, once completed and signed by the person appointed to assess the activation of the Delay procedure, must be deposited at the place indicated “Procedure for the public disclosure of Inside Information” adopted by the Company and be kept in a special archive at the Company itself.

It should also be remembered that, pursuant to the provisions of Article 3.2 of the aforementioned Procedure, the person who has carried out the assessment of the right to delay the disclosure to the public of the Inside Information must immediately inform the Designated Officer in charge of the Company’s Insider Register about the activation of the delay procedure so that the latter can open the applicable “Single Section” of the Registry.

Notification of the Delay to Consob concerns Section I and Section III only (the notification will be filled in when the information is disclosed to the public). Section II will be sent to Consob only upon request]

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Definitions

Conditions for the Delay: the conditions for the delay referred to in Article 17, paragraph 4 of the MAR and Article 3 of the Procedure.

Inside Information: information that is classified as inside information pursuant to Article 7 of the MAR and Article 1 of the Procedure.

ITS 1055: Implementing Regulation (EU) 2016/1055 of the European Commission of 29 June 2016.

MAR: Regulation (EU) no. 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation).

Procedure: the procedure called “*Procedure for the Public Disclosure of Inside Information*” adopted by the Company.

Delay: the delay in disclosing Inside Information to the public pursuant to the provisions of Article 17, paragraph 4 of the MAR and Article 3 of the Procedure.

Company: DiaSorin S.p.A., with registered office in (VC), via Crescentino snc.

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SECTION I

Assessments related to the delay

Inside Information subject to the Delay:	<i>[Note: to be completed with the indication of the Inside Information subject to the Delay (e.g. contract / project / corporate or financial event / accounting data / announcement of lower-than-expected profits, etc.).]</i>
Date and time of the Inside Information:	<i>[Note: to be completed with an indication of the date and time of first existence of the Inside Information at the Company.]</i>
Date and time of the decision to delay the disclosure of the Inside Information:	<i>[Note: to be completed with an indication of the date and time of the decision to activate the procedure for the activation of the Delay.]</i>
Date and time of the probable disclosure of the Inside Information:	<i>[Note: to be completed with an indication of the date and time of the probable disclosure to the public of the Inside Information by the Company.]</i>
Person responsible for taking decision (i) to delay disclosure and (ii) establishing the beginning of the Delay period and its probable end:	<i>[Note: to be completed with an indication of the identity and position held by the person responsible for taking the decision to delay the disclosure and the decision establishing the start of the Delay period and its probable end, pursuant to the provisions of the Procedure (e.g. the Chief Executive Officer Carlo Rosa or the Chairman of the Board of Directors Gustavo Denegri).]</i>
Responsible for continuous monitoring of the Conditions for the Delay:	<i>[Note: to be completed with an indication of the identity and position held by the entity responsible for continuous monitoring, during the Delay period, of the Conditions for the Delay.]</i>
Responsible for the decision to disclose the Inside Information to the public:	<i>[Note: to be completed with the indication, depending on the case, of the body or the identity and position held by the person responsible for taking the decision to disclose to the public the Inside Information subject to Delay.]</i>
Person responsible for the disclosure to CONSOB of the information requested for the Delay and of the explanation in writing:	<p>Name: [●] Surname: [●] Position: [●] Telephone no: [●] E-mail address: [●]</p> <p><i>[Note: to be completed with the indication of the given name, surname and position held at the Company of the person responsible pursuant to the Procedure for disclosing the Inside Information, who will be entrusted with (i) informing CONSOB of the information required for the Delay of the ITS 1055; and (ii) providing CONSOB with a written explanation regarding the Delay of the Inside Information.]</i></p>
Method of disclosure of the Delay to CONSOB:	<i>Immediately after the Inside Information subject to this Delay procedure has been disclosed to the public, the Delay shall be disclosed to CONSOB in the manner indicated in CONSOB Communication no. 0061330 of 1 July 2016, i.e. by</i>

	<i>means of a notification sent by certified e-mail to the email address consob@pec.consob.it, specifying the “Markets Division” as the addressee and indicating the subject at the beginning “MAR Disclosure Delay”.</i>
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_____, on _____

[Place and date of the assessment]

[Signature of the person who carried out the assessment and indication of the position held]

* * *

SECTION II

PROOF OF FULFILMENT OF THE CONDITIONS FOR THE DELAY

<p>Proof of fulfilment of the Conditions for the Delay:</p>	<p><i>[Note: to be completed with an indication of the proof of the initial satisfaction of the Conditions for the Delay (shown below) and of any changes in this regard occurring during the Delay period.</i></p> <p><i>Conditions for the Delay:</i></p> <ol style="list-style-type: none">1. <i>(a) immediate disclosure would probably undermine the legitimate interests of the Company;</i>2. <i>(b) the Delay in disclosure would probably not have the effect of misleading the public;</i>3. <i>(c) the Company is able to guarantee the confidentiality of such information.</i> <p><i>With reference to point (c) above, reference may be made, for example, to the adoption by the Company of the Procedure, also providing indications regarding:</i></p> <p><i>(i) protective barriers of both internal and external information to prevent access to Inside Information by other persons beyond those that, in the Company, must be accessed in the normal exercise of their professional activity or their own function;</i></p> <p><i>(ii) arrangements to disclose Inside Information as soon as it is no longer guaranteed confidentiality.]</i></p>
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[Place and date of the assessment]

[Signature of the person who carried out the assessment and indication of the position held]

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SECTION III

IDENTIFICATION OF THE INSIDE INFORMATION WHICH IS SUBJECT TO THE DELAYED DISCLOSURE

Title of the press release:	<i>[Note: to be completed with the indication of the full title of the press release disclosing the Inside Information which is subject to the delayed disclosure.]</i>
Reference number:	<i>[Note: to be completed with the indication of the identification number of the Inside Information subject of the press release provided by the SDIR system, in accordance with the Annex, Section B, of the Delegated Regulation (EU) n. 1437/2016.]</i>
Date and time of the Inside Information disclosure to the public:	<i>[Note: to be completed with the indication of the date and time of the Inside Information Disclosure to the public, meaning the disclosure time via the SDIR system.]</i>

[Place and date of the assessment]

[Signature of the person who carried out the assessment and indication of the position held]