



INTERNAL RULES OF CONDUCT OF
CRITERIA CAIXA, S.A., SOCIEDAD UNIPERSONAL
ON MATTERS RELATING TO THE SECURITIES MARKET

Approved by the Board of Directors of Criteria Caixa, S.A.U.
on 28 July 2020.

CONTENTS

PREAMBLE.....	3
PRELIMINARY TITLE DEFINITIONS	3
1. Definitions	3
TITLE I SCOPE OF APPLICATION AND INCLUSION IN THE LISTS	5
2. Scope of application	5
3. Acquisition of Affected Person status	5
4. Loss of Affected Person status	6
5. Insider List.....	6
TITLE II MONITORING AND CONTROL OF THE RULES	7
6. The Monitoring Body.....	7
TITLE III OWN ACCOUNT TRANSACTIONS.....	8
7. Concept.....	8
8. Ban on speculative dealings and closed periods	8
9. Notices and disclosure duties.....	8
10. Portfolio management	9
TITLE IV INSIDE INFORMATION, GENERAL DUTIES AND PROTECTION MEASURES.....	9
11. Duty to abstain	9
12. Duty to safeguard	10
13. Inside Information protection measures.....	10
14. Disclosure of Inside Information	11
15. Exception to the duty of disclosure to the public	12
TITLE VI MARKET MANIPULATION	12
16. Ban on market manipulation.....	12
TITLE VII MAINTENANCE OF COMMUNICATIONS, NON-COMPLIANCE, IMPLEMENTATION AND UPDATING.....	12
17. Maintenance of communications.....	12
18. Non-compliance	12
19. Update	12
20. Corporate intranet.....	12
21. Training.....	12
APPENDIX 1 INSIDER LIST TEMPLATE	13

PREAMBLE

These Internal Rules of Conduct of Criteria Caixa, S.A., Sociedad Unipersonal (the “**Company**”) on matters relating to the Securities Market (the “**Rules**”), approved by the Company's Board of Directors at the meeting held on 28 July 2020 and substituting the previous version of the document, aims to bring certain actions of the Company (as a securities issuer), its governing body, senior executives and other persons subject to the rules of conduct set out in the Restated Text of the Securities Market Act, approved by Royal Legislative Decree Law 4/2015, of 23 October (Ley del Mercado de Valores, “**LMV**”), into line with Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation, “**MAR**”) and its implementing regulations, which shall be observed by all the aforementioned parties while carrying out activities related to the securities market.

In this regard, it is the duty and intention of the Company as a securities issuer to act with the utmost care and transparency in all its actions, in order to ensure market integrity and respect for investors' legitimate interest, in compliance with these Rules and the prevailing securities market legislation that, where applicable, relates to the specific area of activity of the Company, with respect to those matters regulated in these Rules.

PRELIMINARY TITLE **DEFINITIONS**

1. Definitions

For the purpose of these Rules, the following definitions will apply:

- **CNMV:**

Comisión Nacional del Mercado de Valores (Spanish Securities Market Regulator)

- **Group:**

Criteria Caixa, S.A., Sociedad Unipersonal, and all the entities that are subject, with respect thereto, to any of the situations foreseen in article 42 of the Commercial Code.

- **Inside Information:**

All specific information relating, directly or indirectly, to the Company, any Group company or the Affected Securities, that has not been made public and that, if it were made public, may have a significant effect on the prices of those Affected Securities.

The information shall be deemed to be of a specific nature if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, 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 price of the Affected Securities.

In this respect, in the 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 that 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 will be deemed to be Inside Information if, in and of itself, it satisfies the criteria of Inside Information mentioned in the corresponding definition.

In addition, it shall be considered that information may have a significant effect on the price of the Affected Securities if a reasonable investor would be likely to use it as part of the basis of his or her investment decisions.

- **Insider List:**

The list governed by article 5 of these Rules.

- **LMV:**

Restated text of the Securities Market Act, approved by Royal Legislative Decree Law 4/2015, of 23 October, or any regulation substituting the same in the future.

- **Monitoring Body:**

The internal body entrusted with the duty, among others, of ensuring compliance with these Rules.

- **Persons Discharging Managerial Responsibilities:**

The persons indicated in sections (i), (ii) and (v) of article 2.1 of these Rules.

- **Affected Persons:**

The persons listed in article 2.1 of these Rules.

- **Related Persons:**

The following individuals are deemed to be Related Parties of the Affected Persons:

- (i) their spouse, or a partner considered to be equivalent to a spouse in accordance with national law;
- (ii) a dependent child of an Affected Person;
- (iii) a relative who has shared the same household with the Affected Person for at least one year on the date of the transaction concerned;
- (iv) any legal person, trust or partnership in which the Affected Person or the persons indicated in the previous paragraphs discharges managerial responsibilities or that are directly or indirectly controlled by such a person, or that has been set up for the benefit of such a person, or whose economic interests are substantially equivalent to those of such a person; or
- (v) any legal person over which an Affected Person directly or indirectly holds 20% or more of the entity's voting rights or capital;
- (vi) any other person or entity considered to be a Related Party in prevailing legislation.

- **MAR:**

Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse, or any regulation that may substitute it in the future.

- **Rules:**

The present Internal Rules of Conduct.

- **Company:**

Criteria Caixa, S.A., Sociedad Unipersonal.

- **Affected Securities:**

Affected Securities include:

- (i) negotiable securities issued by the Company or by entities within its Group that have been admitted to trading on an official secondary market or other regulated markets, within multilateral trading facilities, or on other organised secondary markets
- (ii) financial instruments and contracts granting the right to acquire such securities

- (iii) financial instruments and contracts whose underlying assets consist of the aforementioned securities, instruments, or contracts
- (iv) the negotiable securities issued by entities other than the Company or entities within its Group, and the financial instruments and contracts related to these securities, regarding which the Inside Information was obtained, and
- (v) the securities and financial instruments that as applicable, are expressly defined by the Monitoring Body other than those referred to in sections (i) to (iv) above, in order to best comply with these Rules.

TITLE I

SCOPE OF APPLICATION AND INCLUSION IN THE LISTS

2. Scope of application

2.1. These Rules shall apply, in their entirety, to the following persons (the “**Affected Persons**”):

- (i) the members of the Company's Board of Directors;
- (ii) the members of the Company's Management Committee;
- (iii) any other employee or third party that, in the opinion of the Monitoring Body, may have access to data and information that constitute Inside Information;
- (iv) the Secretary and Deputy Secretary of the Board of Directors, when they are not included in sections (i) and (ii) above or in section (v) below; and
- (v) senior executives having regular access to Inside Information relating directly or indirectly to the Company, as well as power to take managerial decisions affecting the Company's future developments and business prospects (in conjunction with the Affected Persons indicated in sections (i) and (ii) above, the “**Persons Discharging Managerial Responsibilities**”)

2.2. It is hereby expressly stated that, without prejudice to their legal personality, Criteria Caixa, S.A.U. and the other companies in the Critería Group shall not be considered Affected Persons for the purposes of these Rules.

2.3. With reference to the provisions of section 2.1.(v), the managers of the Company's different areas shall inform the Monitoring Body of any cases in which, in their opinion, an entity or a person should be considered an Affected Person.

2.4. The Monitoring Body will have a continuously updated comprehensive list of Affected Persons, made available to the governing bodies of the Company and to all supervisory authorities at any given time.

Each year, the Monitoring Body will also prepare a list of Parties Related to Persons Discharging Managerial Responsibilities. To that end, the Persons Discharging Managerial Duties must inform the Monitoring Body of any future changes in the relationships with their Related Parties.

3. Acquisition of Affected Person status

3.1. Whenever a person should become subject to these Rules, the Monitoring Body will send them a letter advising them of this situation,

3.2. The Affected Person will declare that they accept the Rules, agreeing to comply with all the existing obligations to this end.

4. Loss of Affected Person status

- 4.1. The status of Affected Person can be lost automatically or through a decision by the Monitoring Body.
- 4.2. Termination of the employment or services relationship with the Company automatically entails the loss of Affected Person status, without the need for any notice in that regard.
- 4.3. The Monitoring Body, on its own initiative or at the request of the person affected or the head of their area, may determine loss of Affected Person status in cases in which the motives that justified having the status of Affected Person no longer exist. The Affected Person will be notified of this circumstance through a letter enabling acknowledgement of receipt.
- 4.4. The loss of status of Affected Person status only means cancellation of the obligations assumed thereby on account of that status. However, the remaining general obligations concerning the securities market shall remain in effect, irrespective of Affected Person status.

5. Insider List

- 5.1. During the study or negotiation phase of any type of legal or financial transaction or internal process as part of which Insider Information may be generated or received, the persons aware of this information shall be reported confidentially to the Secretary of the Monitoring Body, who shall create, for each transaction, an Insider List, setting out the name of the Affected Persons who have access to Inside Information.

The Insider List will be prepared and kept up-to-date by the Secretary of the Monitoring Body in electronic format using the templates provided in **Appendix I**.

- 5.2. The Insider List must be immediately updated in the following cases:
 - (i) When there is a change in the reasons why a person is on the Insider List;
 - (ii) When a new person needs to be added to the Insider List;
 - (iii) When a person appearing on the list no longer has access to Inside Information, in which case the date on which they ceased to have such access must be recorded; and
 - (iv) When the information ceases to be Inside Information.

A new Insider List need not be created when the persons having access to the Inside Information are on the Insider List open for the same transaction at another Group company.

- 5.3. The Monitoring Body shall expressly inform the Affected Persons included on the Insider List of the confidential nature of the Inside Information and of their duty to maintain confidentiality and the prohibitions restricting use; as well as the infractions and penalties applicable in the event of improper use. In addition, the Monitoring Body shall inform the Affected Persons of their duty to provide the necessary details for the Company to maintain the Insider List pursuant to the regulations in force.
- 5.4. The data contained in the Insider List must be kept for five years from the later of the date the list was created or the last update thereof.
- 5.5. The Monitoring Body shall make a copy of the Insider List available to the supervisory authorities.

TITLE II
MONITORING AND CONTROL OF THE RULES

6. The Monitoring Body

- 6.1. The Monitoring Body shall comprise at least three members, including a Chairman and Secretary, all appointed by the Company's Board of Directors.
- 6.2. The members of the Monitoring Body shall maintain secrecy regarding the deliberations and resolutions of the body, shall generally refrain from disclosing the information to which they have access in the performance of their duties, and shall refrain from using the foregoing for the benefit of themselves or of third parties, without prejudice to the transparency obligations provided for in these Rules and in applicable law.
- 6.3. The Monitoring Body assumes the functions entrusted to it under these Rules and, in particular, it undertakes to:
- (i) comply and ensure compliance with the rules of conduct of the securities market and these Rules, its procedures and other additional, present or future regulations;
 - (ii) develop, where applicable, any procedures and implementing regulations considered necessary for applying these Rules;
 - (iii) promote awareness of the Rules by the Affected Persons;
 - (iv) answer any questions or queries that may arise in connection with these Rules, without prejudice to the possibility of elevating to the Board of Directors those issues that the Monitoring Body deems necessary or appropriate;
 - (v) determine the persons to be considered Affected Persons pursuant to the provisions of article 2.1 of these Rules;
 - (vi) prepare and update the Insider List;
 - (vii) inform Affected Persons that they have been included on the Insider List and of any other circumstance referred to in article 5.3 of these Rules;
 - (viii) institute, where appropriate, disciplinary proceedings against Affected Persons for any violation of these Rules;
 - (ix) analyse and, wherever appropriate, extend the relevant authorisations in accordance with these Rules;
 - (x) propose to the Company's Board of Directors, any updates and amendments to these Rules deemed necessary; and
 - (xi) provide the Affected Persons with the documents they may need to comply with all obligations set forth in these Rules.
- 6.4. The Monitoring Body shall have all the powers necessary for fulfilling its duties, being particularly enabled for aspects including but not limited to requesting any information necessary from the Affected Persons.
- 6.5. The Monitoring Body shall prepare an annual report for the Board of Directors, subject to prior approval by the Audit and Control Committee, including summary of the regulatory initiatives carried out by the CNMV or by any other authority with jurisdiction in the securities market and an evaluation of the compliance with these Rules, including a description of the main compliance incidents or areas of improvement arising during the year.

Notwithstanding the above, the Monitoring Body shall immediately report to the Board of Directors, through communication to the Audit and Control Committee, any compliance incidents that arise on matters under its jurisdiction.

TITLE III

OWN ACCOUNT TRANSACTIONS

7. Concept

Own account transactions are transactions carried out by Affected Persons on Affected Securities.

8. Ban on speculative dealings and closed periods

- 8.1. Unless expressly authorised by the Chief Executive Officer, Affected Securities acquired or sold by the Company or by Affected Persons on their own account may not be sold or repurchased in the same trading session or on the same day as the purchase or sale transaction (opposite sign trades).
- 8.2. The Persons Discharging Managerial Responsibilities shall refrain from trading, on their own account or on the account of third parties, directly or indirectly, shares or debt instruments of CriteriaCaixa or derivatives other related instruments from 30 calendar days prior to the timeframe established by the Company for the publication its annual financial statements or six-monthly financial report.

9. Notices and disclosure duties

- 9.1. Persons Discharging Managerial Responsibilities must inform the Monitoring Body and the CNMV (in the latter case, using the legally-stipulated format, content and channels) of all transactions involving Affected Securities and carried out on their own account. Such notifications shall be made promptly and no later than three business days after the transaction date.
- 9.2. As an exception to the foregoing, the Persons Discharging Managerial Responsibilities and their Related Parties shall not be required to submit these notices when, within a single calendar year, the total amount of transactions involving Affected Securities carried out on their own behalf does not exceed the amount of 20,000 euros. The 20,000 euros threshold will be calculated as the sum of all transactions referred to in the preceding section, without offsetting transactions of a balancing nature (such as buy and sell transactions). This exception shall not apply under any circumstances to members of the Board of Directors or their Related Parties, providing that the director has control over the exercise of the voting right.
- 9.3. The Monitoring Body may determine which transactions, due to their amount or risk, should be reported before being made, in addition to requiring the Affected Person to carry out the notification referred to in section 9.1, depending on the specific duties performed by the Affected Person.
- 9.4. If the Monitoring Body determines that a security or financial instrument is an Affected Security pursuant to the provisions of section (v) of the definition of Affected Security of these Rules, it shall update this information in due course on the corporate intranet and, where appropriate, will communicate it in writing to the Affected Persons without access to the corporate intranet, for them to carry out, where appropriate, the necessary notifications.

10. Portfolio management

When the Persons Discharging Managerial Responsibilities and their Related Parties have signed a discretionary portfolio management agreement, with a view to complying with the obligations of communicating transactions performed on their own behalf involving the Affected Securities set out in article 9 of these Rules, these agreements shall require that the manager immediately inform them about the execution of transactions involving the Affected Securities.

TITLE IV

INSIDE INFORMATION, GENERAL DUTIES AND PROTECTION MEASURES

11. Duty to abstain

11.1. The Affected Persons and, in general, any person having Inside Information, when they know or ought to know that the information is such, must refrain from the following conduct, either on their own behalf or on another party's behalf, directly or indirectly:

- (i) Acquiring or disposing of, for their own account or on behalf of third parties, the Affected Securities or any other security, financial instrument or contract of any type, whether or not it is traded on a secondary market, that has the Affected Securities as the underlying asset, and referred to in the Inside Information. The use of this type of information to cancel or amend an order regarding an Affected Security referred to in the information will also be considered insider dealing, when the order was placed before the person concerned possessed the Inside Information. The Affected Persons must also refrain from mere attempts to perform any of the foregoing transactions.
- (ii) Communicating Inside Information to third parties, unless this is necessary because it is required for the responsible performance of their employment, profession or duties, providing that those who receive the information are subject, in the normal exercise of their duties, to a legal or contractual duty of confidentiality, and have confirmed to the Company that they have the necessary means for safeguarding it.
- (iii) Recommending to a third party that they carry out any of the transactions referred to in section (i) above or relating to the Affected Securities, or to make another party undertake these transactions based on Inside Information.

The subsequent revelation of the above-mentioned recommendations or inducements will also be deemed unlawful communication of Inside Information, when the party revealing the recommendation or inducement knows or ought to know that it was based on Inside Information.

Where the person is a legal person, this article shall also apply to the natural persons who participate in the decision to carry out the acquisition, disposal, cancellation or amendment of an order relating to Affected Securities, for the account of the legal person concerned.

11.2. For the purposes of article 11.1, except where the CNMV determines that there are no legitimate reasons for doing so, an Affected Person or a person having Inside Information will not be deemed to have engaged in insider dealing in the following cases:

- (i) Where that person conducts transaction to acquire or dispose of Affected Securities and that transaction is carried out in the discharge of an obligation that has become due in good faith and not to circumvent the prohibition against insider dealing and:
 - (a) that obligation results from an order placed or an agreement concluded before the person concerned possessed the Inside Information, or

- (b) that transaction is carried out to satisfy a legal or regulatory obligation that arose before the person concerned possessed the Inside Information
- (ii) In general, in the case of transactions carried out in accordance with applicable regulations.

12. Duty to safeguard

- 12.1. Affected Persons and, in general, any party having access to Inside Information are required to:
- (i) safeguard the information, without prejudice to their disclosure duties and their duty to collaborate with judicial and administrative authorities
 - (ii) adopt appropriate measures to prevent the Inside Information from being used improperly or unfairly
 - (iii) provide immediate notice to the Monitoring Body, which, in turn, shall inform the Audit and Control Committee and the Board of Directors through a communication to its Deputy Secretary, of any improper or abusive use of Inside Information of which they are aware.
- 12.2. The necessary security measures will be established to ensure that any physical and electronic media containing Inside Information is safeguarded from access by unauthorised third parties. In particular, any legal or financial transactions that might affect the price of Affected Securities shall always be identified with code names.

13. Inside Information protection measures

- 13.1. At the start of each project or transaction that might contain (or be liable to generate) Inside Information, the head of the area in question shall assign a code name to identify the information. This code name will be disclosed to each person involved. Once the code name has been established, it shall be used to identify the transaction or project, thus avoiding the use of the actual name of the securities or companies in question. Notwithstanding the foregoing, the companies or securities shall be identified by their own name in the Insider List and in official Company documents that may be of significance outside the organisation.
- 13.2. The necessary security measures will be established to ensure the safekeeping, filing, access, reproduction and distribution of Inside Information. By way of example but without limitation, such measures may include the following:
- (i) Documents used in transactions must state in a visible place that they are confidential documents exclusively for internal use;
 - (ii) Company personnel who have access to Inside Information must adopt, as provided for in these Rules, the necessary measures to ensure it is correctly protected, preventing the Inside Information from being made available to unauthorised persons or from being improperly transferred;
 - (iii) Necessary measures will be adopted so that documents, files, CD-ROMs, DVDs and any other media that contain Inside Information are kept in secure places and under lock and key when they are not being used, to prevent unauthorised access or improper reproduction thereof. Furthermore, computers used in any project or transaction that contain Inside Information must have systems that restrict access exclusively to the people in the area who participate in such projects or transactions. The heads of each area are responsible for taking the necessary arrangements to ensure full compliance with these measures;

- (iv) Conference rooms must be checked before and after meetings to ensure that materials containing Inside Information are removed after meetings have ended and before the room is used again. Special care must be taken with notes and diagrams made on boards and similar equipment;
- (v) No aspect of the projects or transactions that contain Inside Information may be commented on in public places or in areas where there is a risk of being overheard by persons who should not know the information; and
- (vi) Extreme caution must be taken regarding security when communicating through potentially unsecured media such as mobile phones, faxes or email. In particular, information must not be sent to terminals that are unmanned at the time of sending or that could be accessed by unauthorised persons.

TITLE V

DISCLOSURE OF INSIDE INFORMATION

14. Disclosure of Inside Information

- 14.1. The Company will disclose the Inside Information that directly concerns it, as promptly as possible, under the terms and conditions and with the exceptions provided for in the applicable regulations, ensuring that Inside Information is disclosed in such a way as to allow the public to access it without delay and to fully and completely evaluate the information, in a timely manner.

Inside Information must first be duly published on the CNMV website and all Inside Information disclosed to the market must be consistent.

- 14.2. The content of the disclosure shall be accurate, clear, and complete and, if appropriate, the information should be quantified and worded in a way that neither misleads or causes confusion. The information shall be expressed in a neutral manner, regardless of whether it may influence the trading price of the Affected Securities in a favourable or adverse way.
- 14.3. Inside Information shall be disclosed on the Company's website.
- 14.4. In the event an Affected Person acting on their own account or on behalf of the Company reveals Inside Information in the ordinary course of his or her employment, profession or duties, the Inside Information must be made public in full, simultaneously if intentional disclosure, or promptly if non-intentional disclosure. The provisions of this section shall not apply if 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.
- 14.5. The Company shall keep all Inside Information on the Company's corporate website that it is required to make public for a period of at least five years.
- 14.6. Any financial or corporate information that the Company considers must be published as it is of special interest or on account of a legal or regulatory obligation, provided that it does not fall into the Inside Information category, will be disclosed to investors pursuant to the corresponding procedure set out on the CNMV website and under the category of "Communication of Other Relevant Information (ORI)" or any procedure that is set up in the future.

15. Exception to the duty of disclosure to the public

The Company may delay, on its own responsibility, the public disclosure of Inside Information provided that it does so under the circumstances and pursuant to the requirements established in the applicable regulations

TITLE VI
MARKET MANIPULATION

16. Ban on market manipulation

The Affected Persons shall refrain from manipulating or attempting to manipulate the market whether for direct or indirect personal gain or on behalf of the Company or the Group as regards the Affected Securities, pursuant to the provisions of the applicable regulations.

TITLE VII
MAINTENANCE OF COMMUNICATIONS, NON-COMPLIANCE, IMPLEMENTATION AND UPDATING

17. Maintenance of communications

The Monitoring Body is required to properly store communications, notifications and any other document associated with the obligations defined in these Rules, during a minimum of five years.

18. Non-compliance

18.1. Failure to comply with these Rules shall be considered professional misconduct, the severity of which will be determined following the appropriate procedure under prevailing provisions.

18.2. These rules shall apply without prejudice to the administrative, civil or criminal liability of the breaching party in each case.

19. Update

In accordance with current legislation, these Rules shall be updated by the Board of Directors whenever necessary to adapt the content to prevailing applicable provisions.

20. Corporate intranet

20.1. The Monitoring Body shall maintain the following documentation on the Company's corporate intranet:

- (i) these Rules, and
- (ii) the forms needed in order to comply with the obligations arising from these Rules

21. Training

21.1. All Affected Persons shall receive training on these Rules when they are first deemed to have that status.

21.2. In addition, all Affected Persons shall receive refresher training on the Rules with the frequency determined by the Monitoring Body.

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APPENDIX 1
INSIDER LIST TEMPLATE

SECTIONS REFERRING TO DIFFERENT INSIDE INFORMATION

Insider List: section related to [name of the deal-specific or event-based inside information]

Date and time (of creation of this section of the insider list, i.e. when this inside information was identified): [yyyy-mm-dd; hh: mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Birth surname(s) of the insider (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Obtained	Ceased (the date and time at which a person ceased to have access to inside information)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address (street name; street number; city; post/zip code; country)

PERMANENT INSIDERS SECTION OF THE INSIDER LIST

Date and time (of creation of the permanent insiders section): [yyyy-mm-dd; hh:mm UTC (Coordinated Universal Time)]

Date and time (last update): [yyyy-mm-dd; hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider	Surname(s) of the insider	Birth surname(s) of the insider (if different)	Professional telephone number(s) (work direct telephone line and work mobile numbers)	Company name and address	Function and reason for being insider	Included (the date and time at which a person was included in the permanent insider section)	Date of birth	National Identification Number (if applicable)	Personal telephone numbers (home and personal mobile telephone numbers)	Personal full home address (street name; street number; city; post/zip code; country)