



INSIDER TRADING POLICY SUPPLEMENT

The attached Insider Trading Policy applies to you, as a Person discharging managerial responsibilities (PDMR), and to your Closely Associated Persons (CAPs).

We will reconfirm your list of CAPs annually. It is your responsibility to provide any changes to your CAPs in between confirmation periods.

PDMR Name: _____

List of Closely Associated Persons:

Full legal name	Relationship to PDMR	Email address

Actions:

Confirm you have read and understand the Insider Trading Policy.

Confirm your list of Closely Associated Persons is complete.

Confirm that you will inform your Closely Associated Persons about their obligations under the Insider Trading Policy.

Signature:

Date:

Definitions:*Persons discharging managerial responsibilities (PDMRs)*

A PDMR is a person who is: (a) a member of the administrative, management or supervisory board of the Company; or (b) a senior executive who is not the member of the bodies referred to in section (a) above but who has regular access to inside information relating directly or indirectly to the Company and power to take managerial decisions affecting the future development and business prospects of the Company.

For the purposes of this Policy the following persons shall be considered to be PDMRs: (a) Board members of the Company; (b) the CEO; and (c) all other members of Executive Management.

PDMRs and persons closely associated to such persons are subject to certain reporting obligations (see Insider Trading Policy section 3.2) and specific trading prohibitions (see Insider Trading Policy section 3.4).

Each PDMR is responsible for informing its closely associated persons about their respective obligations under this Policy.

Closely associated persons

A “closely associated person” to a PDMR means: (a) a spouse, or a partner considered to be equivalent to a spouse of a PDMR; (b) a child in custody of a PDMR; (c) a relative of a PDMR who has shared the same household for at least one year on the date of the transaction concerned; or (d) a legal person: (i) the managerial responsibilities of which are discharged by a PDMR or by a person closely associated to such person (i.e., a person referred to in (a)–(c) above); or (ii) which is directly or indirectly controlled by a PDMR or by a person closely associated to such person (i.e., a person referred to in (a)–(c) above); or (iii) which is set up for the benefit of a PDMR or by a person closely associated to such person (i.e., a person referred to in (a)–(c) above); or (iv) the economic interests of which are substantially equivalent to those of a PDMR, or by a person closely associated to such person (i.e., a person referred to in (a)–(c) above).