



Current Report No: 6/2020

Date of preparation: 2020-05-11

Title:

Review and update of the individual internal confidential information reporting procedure in IDMSA

Legal basis: Art. 17 sec. 1 of MAR - confidential information

Content of report:

Management Board of IDM S.A. acting pursuant to Art. 17. paragraph 1 Regulation of the European Parliament and of the Council (EU) No. 596/2014 of April 16, 2014 on market abuse (market abuse regulation) and repealing the directive 2003/6 / EC of the European Parliament and of the Council and Commission Directives 2003/124 / EC, 2003/125 / EC and 2004/72 / EC (hereinafter: MAR) hereby make public that today adopted a resolution on periodic internal verification of the procedure specifying the rules for reporting confidential information (hereinafter: ISR), which was established and adopted by the Management Board Resolution No. 1/04/07/2016 of 04/07/2016 and disclosed to the public in the current report no 23/2016 of 04.07.2016. The Management Board adopted the consolidated text of the RRI by the above-mentioned resolution, which is attached as an appendix to this report as an integral part thereof.

Periodic RRI verification was performed due to changes in the economic structure IDMSA due to the cessation of the creation of a capital group by IDMSA, and thus the need establishing a new threshold for the notion of "significant value" as a selection tool and qualification of a specific event as information of a potential price-generating nature due to on the obligation of the Company to independently assess the nature of IDMSA data in the process of analyzing the occurring phenomena and events in terms of the need to report them.

With regard to the concept of "significant value", the Company takes into account the general definition of confidential information of the MAR Regulation as a starting point. On the other hand, the thresholds in the RRI are not understood by the Company as fixed values from the perspective of the assessment of the significance of information, but they are treated as a tool facilitating the selection and classification of a specific event as information of a potential price-generating nature due to the Company's obligation to independently assess the nature of IDMSA data resulting in the process of analyzing the occurring phenomena and events in terms of the need to report them. Each event is subject to individual assessment and verification for information obligations, and the Company will analyze the occurring or possible events from the point of view of their influence on the performance of the aforementioned obligations.