



PROCEDURE

IDENTIFICATION OF RELEVANT PARTIES AND DISCLOSURE OF THE TRANSACTIONS EXECUTED BY THEM IN RELATION TO SHARES ISSUED BY INTERPUMP S.P.A. OR OTHER FINANCIAL INSTRUMENTS CONNECTED TO THEM

(Internal dealing procedure)

1. Introduction

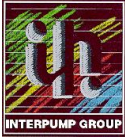
This procedure has been prepared in compliance with the provisions contained (i) in the Regulation no. 596/2014 (hereinafter also "MAR Regulations") and in particular with Article 19; (ii) in the Implementing Regulation (EU) 2016/522 of 17 December 2015, that provides detailed rules, including the transactions subject to reporting requirements and of so-called "black-out period"; (iii) in the Implementing Regulation (EU) 2016/523 of 10 March 2016 laying down technical standards with reference, among other things, to the mode of communication of relevant transactions for the purposes of internal dealing; (iv) in art. 114, paragraph 7, of Legislative Decree no. No. 58 of 24 February 1998 (hereinafter the "Consolidated Finance Act" or "TUF"); and (v) in art. 152 and following of Consob Regulation no. 11971 (hereinafter Issuer Regulation) concerning the identification of relevant persons and communication of transactions performed by them, also through third parties, involving shares issued by Interpump Group S.p.A. or other financial instruments linked to them.

The Procedure effective from 3 July 2016 and lastly amended on 4 October 2021, is published on the Interpump Group S.p.A. website at <https://www.interpumpgroup.it/uk/procedure-market-abuse.aspx>.

2. Relevant parties

For the purposes of this procedure are considered Relevant Parties:

(a) the Chairman of the Board of Directors and the Chief Executive Officer, the Vice Chairman,



Directors, the Chairman of the Board of Statutory Auditors and the Statutory Auditors of Interpump Group S.p.A., the secretary of the Board of Directors, the CFO and the Manager responsible for corporate reporting;

(b) the directors who, although not members of the bodies or by holding the titles referred to in subparagraph (a), have regular access to inside information related directly or indirectly to the Company and have the power to make management decisions that may affect the future evolution and perspectives of Interpump Group S.p.A.;

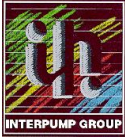
(c) the parties that perform management functions and that have regular access to inside information and that are in possession of powers to make management decisions that can affect the evolution and future prospects of direct or indirect subsidiary companies of Interpump, if it is a listed issuer, if the book value of the investment in the foregoing subsidiaries is more than fifty percent of the balance sheet assets of the listed issuer, as resulting from the latest approved financial statements;

(d) whoever holds in Interpump Group S.p.A. an interest equal to or greater than ten percent of the share capital with voting rights.

The following are construed as persons closely associated with Relevant Parties:

- a) a spouse or partner equivalent to the spouse under national law;
- b) a dependent child, also of the spouse, under national law;
- c) parents, relatives and persons related by affinity if cohabiting for at least one year;
- d) a legal person, trust or partnership, whose managerial responsibilities are covered by a person who performs the functions of administration, control or management or by a person referred to in subparagraphs a), b) or c), or directly or indirectly controlled by such person, or is constituted at its benefit, or whose economic interests are substantially equivalent to those of such person.

The General Counsel of Interpump Group S.p.A., with the support of the Head of Internal Audit, Risk & Compliance of Interpump Group S.p.A., draws up and keeps promptly updated a list of all relevant persons and persons closely associated with them.



Relevant parties and the closely associated persons with them are herein identified as "Relevant persons".

3. Operations subject to disclosure obligations

Relevant Persons must notify the issuer of the purchase, sale, subscription or exchange of shares or other financial instruments and further compared to shares and related instruments, for example derivatives.

The transactions in question include the transfer of financial instruments under warranty or loan, operations carried out by those who prepare or carry out transactions on a professional basis, or by anyone else so far on behalf of relevant persons or a party closely associated with them, even when discretion is exercised; and certain operations carried out under a life insurance policy.

The Delegated Regulation (EU) 2016/522 integrates the provisions of the MAR Regulation providing a fuller list, although, even in this case, not comprehensive, of operations to be notified. Such as the sale or the exercise of rights, including the put options and call options warrants, the subscription of capital increases or issue of debt securities, and also donations and donations made or received and inheritance received.

The MAR Regulation provides that the notification requirements apply to all subsequent operations once a total amount of 20,000 Euro has been reached within a fiscal year. The threshold of 20,000 Euro is calculated by summing up all operations without compensation as exemplified above.

The amount of 20,000 Euro indicated above is calculated by summing the transactions relative to the shares and financial instruments associated with them, performed on behalf of each Relevant Party and those performed on behalf of the persons closely associated with said Relevant parties.

4. Methods of communication to Consob, to Interpump Group S.p.A. and to the market

The Relevant Persons referred to in subparagraphs a), b) and c) of Article 2 sends the information about each transaction subject to mandatory reporting (hereinafter the "Transaction") performed by them or by persons to them strictly related, within the following day since its execution to the General Counsel and to the Head of Internal Audit, Risk &



Compliance, by e-mail (internalauditing@interpumpgroup.it) or by fax (+39 0522 904444), using the form prepared by Consob, available at <https://www.consob.it/web/area-operativa-interattiva/regolamento-abusi-di-mercato>.

The General Counsel, also through persons identified for this purpose, notifies Borsa Italiana and the market of the Transactions of which he is notified within the term of 3 (three) open market days from the date of the Transaction. The communication must be executed through the dedicated form available within the system for the diffusion of regulated information “eMarket STORAGE”.

The Relevant Persons according to art. 2, subparagraph d) notify Consob and the public about the Relevant Transactions carried out by them (directly or through a third party) and by the Persons Closely Associated with them, by the end of the fifteenth day of the month following the month in which the transaction was carried out, following the same methods indicated in the preceding paragraph and, anyway, in compliance with the requirements of the *pro-tempore* regulations.

This notification can be made, on behalf of the Relevant Persons by the Company, provided that - prior agreement which must be implemented for each notification - these parties send the information relating to the Transaction, within three days since the Transaction was performed. Pursuant to the Regulation (EU) no. 2016/679, General Data Protection Regulation (“GDPR”) and to the applicable national data protection legislation (Legislative Decree 196/2003 as last amended), the Relevant persons disclose only the data necessary to achieve the specific purposes for which they are intended, and they are communicated, in the limits strictly pertinent to the obligations, functions, or purposes indicated above, to Borsa Italiana and diffused to the general public. The data are retained for the period necessary for the purposes for which they were received. Interested parties can exercise their right of access to personal data by contacting the General Counsel of Interpump Group S.p.A.

5. Additional conduct obligations

The Relevant Persons may not carry out Transactions on their own or on behalf of third parties, directly or indirectly, on financial instruments over a period of 30 calendar days



preceding the announcement of the approval of periodic financial reports, of the extraordinary dividend proposal and, where not announced at that time, the proposal of year dividend to the board.

The dates of said meetings are published through press releases on the company's Internet site at the Event Calendar section.

The restrictions do not apply prior authorization of the Chief Executive Officer of Interpump Group S.p.A. based on a case by case basis, under exceptional conditions, such as severe financial difficulties requiring immediate sale of shares and, depending on the trading characteristics, in the case of operations carried out simultaneously or in relation to an employee stock ownership plan or a savings program, a guarantee or rights to shares, or transactions in which the beneficial interest of the bond in question is not subject to change.

6. Party responsible for implementing the procedure

The General Counsel, with the support of the Head of Internal Audit, Risk & Compliance, are the parties responsible for implementing this Procedure.

The aforementioned subjects communicate the contents of this Procedure to the recipients of the obligations specified herein, and is also responsible for the reception, management, and diffusion to the market and, where so requested by the interested parties, to Consob, of the information relative to Transactions performed by Relevant persons.

The General Counsel must provide the Relevant party with immediate confirmation, by fax or e-mail, of receipt of the communication.

7. Penalties

Without prejudice to the consequences of the law and regulations stipulated for non-fulfillment of the obligations specified at TUF art. 114 and the applicable measures of the Issuers Code, as well as provided, in general, by the *pro-tempore* regulations, the misuse of inside information and manipulation of the market are offenses attracting criminal and administrative penalties in relation to the relative



perpetrators and can also result in the administrative liability of the company pursuant to legislative decree no. 231/01.

In relations between Relevant parties and Interpump Group S.p.A., failure to observe the obligations and prohibitions prescribed by this Procedure by Company employees may result in the application of disciplinary penalties, without prejudice to the existence of possible responsibilities of a different nature.

8. Final provisions

In accordance with the MAR Regulation, the General Counsel of Interpump Group S.p.A. is obliged to notify, in writing, the Relevant parties about the obligations of which they are entitled and the Relevant parties have the obligation to notify in turn, in writing, the closely associated persons about the reporting obligations provided by the applicable legislation and by this procedure, preserving a copy of the above mentioned notification.

Every Relevant person is required to:

- return a copy of this Procedure, duly signed for receipt and acceptance;
- comply with the provisions set down herein;
- consult the General Counsel if any clarifications are needed in relation to the methods of application of this Procedure.

The Chief Executive Officer will make any amendments and additions to this Procedure that may become necessary as a result of legislative provisions and organizational changes of Interpump Group S.p.A.