



## PROCEDURE

### IDENTIFICATION OF RELEVANT PERSONS 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 current provisions on internal dealing, in particular: (i) the Regulation no. 596/2014 (hereinafter also "MAR Regulations") with specific reference to Article 19; (ii) the Implementing Regulation (EU) 2016/522 of 17 December 2015, that provides detailed rules, inter alia, on transactions subject to reporting requirements and of so-called "black-out period"; (iii) the Implementing Regulation (EU) 2016/523 of 10 March 2016 which defines the technical methods for communicating transactions relevant for internal dealing purposes; (iv) the Legislative Decree no. 58 of 24 February 1998 (hereinafter the "Consolidated Finance Act" or "TUF"); and (v) Articles 152-*sexies* and following of Consob Regulation no. 11971 (hereinafter the "Issuer Regulation") concerning the identification of relevant persons and communication of transactions performed by them, including through third parties, involving shares issued by Interpump Group S.p.A. or other financial instruments linked to them.

The Procedure, in force since 3 July 2016 and last revised on 6 August 2025, is published on the Interpump Group S.p.A. website at:

<https://www.interpumpgroup.it/uk/procedure-market-abuse.aspx>.

#### 2. Relevant Persons

For the purposes of this procedure, the following are considered Relevant Persons:

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



and the Manager responsible for corporate reporting;

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

(c) the parties who perform management functions in companies controlled, directly or indirectly, by Interpump Group S.p.A., who have regular access to inside information and have the power to take management decisions that may affect the development and future prospects of the subsidiary companies of Interpump, if the book value of the investment in the foregoing subsidiaries represents more than fifty percent of the balance sheet assets of the listed issuer, as resulting from the latest approved financial statements;

The following are considered Persons Closely Associated with Relevant Persons:

- a) a spouse or a partner equivalent to the spouse under national law;
- b) a dependent child, including that of the spouse, in accordance with national law;
- c) parents, relatives and relatives by marriage of the Relevant Persons if they have been living together for at least one year;
- d) a legal entity, trust or partnership, whose managerial responsibilities are covered by a person who performs administrative, control or management functions 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 that 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 Persons and the Persons closely associated with them are hereinafter jointly referred to as "Relevant Persons".

### **3. Operations subject to disclosure obligations**

Relevant Persons are required to notify the Company of any purchase, sale, subscription or exchange transactions involving shares issued by Interpump Group S.p.A. or other financial instruments linked to them, including, by way of example, derivative instruments.



The transactions in question include the transfer of financial instruments under warranty or on loan, operations carried out by entities that prepare or carry out transactions on behalf of Relevant Persons or a party closely associated with them, even where there is management discretion, and certain operations carried out under life insurance policies.

The Delegated Regulation (EU) 2016/522 integrates the provisions of the MAR Regulation by providing a non-exhaustive list of operations subject to notification, including: the transfer or the exercise of rights (including put and call options and warrants), the subscription of capital increases or the issue of debt securities, as well as gifts and donations made or received and inheritance received.

The MAR Regulation and the Issuers Regulation provide that 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 without offsetting transactions of opposite sign and by summing the operations carried out on behalf of each Relevant Person and Persons closely associated with them, with reference to shares and related financial instruments.

#### **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 must send the information on any transaction subject to mandatory reporting (hereinafter the "Transaction") performed by them or by persons closely related to them, by the day after it happened, to the *General Counsel* and to the Head of *Internal Audit, Risk & Compliance* (on behalf of the Company), using the form provided by Consob, available at <https://www.consob.it/web/area-operativa-interattiva/regolamento-abusi-di-mercato>. The communication may be sent by e-mail ([internalauditing@interpumpgroup.it](mailto:internalauditing@interpumpgroup.it)) or by fax (+39 0522 904444).

The *General Counsel*, also through persons identified for this purpose, notifies Consob, Borsa Italiana and the market of the Transactions received within the term of 3 (three) open market days from the date of the Transaction. The communication is made using the dedicated form available within the system for the diffusion of regulated information "eMarket STORAGE".

The Relevant Persons referred to in art. 2, subparagraph d) notify Consob and the public of any Relevant Transactions carried out by themselves (directly or through a third party) or 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, in the same manner as described in the previous paragraph and, in any case, in compliance with the provisions of the *pro-tempore* regulations. Such communications may be made by the Company on behalf of Relevant Persons, provided that there is a **prior agreement** for each communication and the information relating to the Transaction is transmitted to the Company **within three days** of the date of the Transaction.

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 personal data communicated by Relevant Persons is limited to what is necessary for the pursuit of the purposes for which it is intended and is communicated, in the limits strictly pertinent to the regulatory obligations, to Borsa Italiana and disclosed to the public. The data are retained for the period strictly necessary to achieve the purposes for which it was collected. Data Subjects may exercise their rights 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 issued by Interpump Group S.p.A. during a period of 30 calendar days prior to the publication of the annual financial report, the half-yearly financial report and additional periodic financial information.

The Board of Directors, or, in urgent cases, the Chief Executive Officer, must identify additional periods or circumstances in which the execution of Transactions by Relevant Persons is subject to restrictions or prohibitions. In such cases, the decisions taken shall be communicated promptly to the Relevant Persons.

The above restrictions do not apply, subject to authorization of the Chief Executive Officer of Interpump Group S.p.A., in exceptional circumstances, such as severe financial difficulties requiring immediate sale of shares, operations carried out simultaneously with or in connection with an employee share ownership plan, a savings program and a guarantee or rights on shares, as well as transactions in which the beneficial interest in the security remains unchanged.

Furthermore, the restrictions do not apply in the case of transactions or trading activities that



don't involve active investment decisions by the Relevant Person, or that result exclusively from external factors or actions by third parties, or that are based on pre-established conditions, such as the automatic exercise of rights conferred by derivative instruments.

## **6. Party responsible for implementing the procedure**

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

In particular, the aforementioned subjects communicate the contents of this Procedure to the recipients of the obligations specified herein, and receive, manage and disseminate to the market information relating to Transactions performed by Relevant Persons, as well as provide, where requested, the transmission of such information to Consob.

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

## **7. Penalties**

Without prejudice to the legal and regulatory consequences provided for failure to comply with the obligations set forth in art. 114 of the TUF and the applicable provisions of the Issuer's Regulations, as well as those provided for, in general, by the *pro-tempore* regulations, insider trading and market manipulation constitute offenses punishable by criminal and administrative penalties against those who commit them and may also result in the administrative liability of the Company pursuant to legislative decree no. 231/01.

In relations between Relevant Persons and Interpump Group S.p.A., failure by Company employees to comply with the obligations and prohibitions prescribed by this Procedure may constitute a disciplinary offense, without prejudice to the possibility of further civil, criminal, or administrative liability.

## **8. Final provisions**

Pursuant to the MAR Regulation, the *General Counsel* of Interpump Group S.p.A. is required to notify, in writing, the Relevant Persons of their obligations. In turn, Relevant Persons are required to notify persons closely associated with them, in writing, of their disclosure obligations under applicable law and this procedure, retaining a copy of the notification.

Every Relevant Person is required to:



- return a signed copy of this Procedure for receipt and acceptance;
- comply with the provisions set down therein;
- contact the *General Counsel* for any clarification regarding 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 regulatory provisions or legislative updates, or significant organizational changes within Interpump Group S.p.A.