

PROCEDURE

**FOR THE IDENTIFICATION OF RELEVANT PERSONS AND THE
NOTIFICATION OF TRANSACTIONS CARRIED OUT BY THEM
INVOLVING SHARES ISSUED BY INTERPUMP GROUP S.P.A. OR
OTHER FINANCIAL INSTRUMENTS LINKED THERETO**

(“Internal Dealing Procedure”)

1. Introduction

This Procedure has been drawn up in compliance with the applicable laws and regulations governing internal dealing, and in particular with: (i) Regulation (EU) No. 596/2014 (hereinafter also the **“MAR Regulation”**), with specific reference to Article 19; (ii) Commission Delegated Regulation (EU) 2016/522 of 17 December 2015, as subsequently amended, which lays down detailed rules, inter alia, concerning transactions subject to notification requirements and the so-called “black-out period”; (iii) Commission Implementing Regulation (EU) 2016/523 of 10 March 2016, which sets out the technical arrangements for the notification of transactions relevant for internal dealing purposes; (iv) Italian Legislative Decree No. 58 of 24 February 1998 (hereinafter the “Consolidated Law on Finance” or **“TUF”**); and (v) Consob Regulation No. 11971/1999 (hereinafter the **“Issuers’ Regulation”**), as amended by Consob Resolution No. 23979 of 14 May 2026, with regard to the identification of Relevant Persons and the notification of transactions carried out by them, including through third parties, involving shares issued by Interpump Group S.p.A. or other financial instruments linked thereto.

The Procedure, which has been in force since 3 July 2016 and was most recently revised on 5 August 2026, is published on the website of Interpump Group S.p.A. (hereinafter **“Interpump”** or the **“Company”**) at: www.interpumpgroup.it/ent

Definitions and interpretative criteria

For the purposes of this Procedure, the terms “Relevant Persons”, “Persons Closely Associated”, “Transactions”, “linked financial instruments”, “inside information”, “closed period” and “business day” shall have the meaning attributed to them under the applicable laws and regulations in force from time to time. In the event of any doubt as to interpretation, the provisions of the MAR Regulation, the relevant delegated and implementing regulations of the European Union, the TUF, the Issuers’ Regulation, as well as any applicable guidelines and clarifications issued by the competent authorities, shall prevail.

It is understood that the applicable threshold shall be assessed separately for each Relevant Person and for each Person Closely Associated with such Relevant Person, by aggregating, without netting, all Transactions carried out by the same person during the calendar year. Once the applicable threshold has been reached, the Transaction that results in the threshold being reached or exceeded, together with all subsequent Transactions carried out by the same person during the same calendar year, shall be subject to notification within the time limits and in accordance with the procedures laid down by the applicable laws and regulations and by this Procedure.

2. Relevant Persons

For the purposes of this Procedure, the following persons shall be considered **Relevant Persons**:

(A) the members of the Board of Directors and the Standing Statutory Auditors of Interpump Group S.p.A.;

(B) the Managers with Strategic Responsibilities, the General Counsel, the Chief Financial Officer, the Manager Responsible for Preparing the Company’s Financial Reports, the Investor Relator, as well as any other executive who, although not a member of the corporate bodies referred to under paragraph (A), has regular access to inside information relating, directly or indirectly, to the Company and has the authority to take management decisions affecting the future developments and business prospects of Interpump Group S.p.A.

The Relevant Persons referred to under this paragraph (B) shall be identified by the Chief Executive Officer, with the support of the General Counsel, on the basis of

a substantive assessment of the functions actually performed, taking into account regular access to inside information relating, directly or indirectly, to the Company and the authority to take management decisions capable of affecting the future developments and business prospects of the Company. Such assessment shall be reviewed at least annually and whenever relevant changes occur in the organisational structure, roles, responsibilities or delegated authorities. The outcome of such assessment shall be submitted to the Board of Directors for review.

The following shall be considered Persons Closely Associated with Relevant Persons:

- a) a spouse or a partner considered to be equivalent to a spouse under national law;
- b) dependent children, including dependent children of the spouse, in accordance with national law;
- c) relatives of a Relevant Person who have shared the same household for at least one year on the date of the Transaction;
- d) any legal person, trust or partnership, including partnerships:
 - i. the managerial responsibilities of which are discharged by a Relevant Person or by a person referred to in paragraphs (a), (b) or (c);
 - ii. which is directly or indirectly controlled by a Relevant Person or by a person referred to in paragraphs (a), (b) or (c);
 - iii. which has been established for the benefit of a Relevant Person or of a person referred to in paragraphs (a), (b) or (c);
 - iv. the economic interests of which are substantially equivalent to those of a Relevant Person or of a person referred to in paragraphs (a), (b) or (c).

The General Counsel of Interpump Group S.p.A., with the support of the Head of the Internal Audit, Risk & Compliance Function, shall draw up and promptly keep up to date the list of Relevant Persons and Persons Closely Associated with them.

Relevant Persons and Persons Closely Associated with them are hereinafter collectively referred to as “**Relevant Persons and Associated Persons**”.

Each Relevant Person shall promptly notify the Chief Executive Officer, through the General Counsel, of any information or change required for the proper identification of the Persons Closely Associated with such Relevant Person, as well as of any persons, entities or vehicles through which Transactions relevant for the purposes of this Procedure may be carried out.

3. Transactions Subject to Notification Requirements

Relevant Persons and Associated Persons are required to notify the Company of transactions involving shares issued by Interpump Group S.p.A. or financial instruments linked thereto no later than one business day following the date on which the transaction was carried out¹.

Transactions subject to notification requirements include, by way of example and without limitation, purchases, sales, subscriptions or exchanges, transactions involving derivatives or other financial instruments linked to shares issued by Interpump Group S.p.A., the pledging or lending of financial instruments, transactions carried out by persons arranging or executing transactions on behalf of Relevant Persons and Associated Persons, including under discretionary portfolio management mandates, as well as transactions carried out under life insurance policies, where the conditions provided for under the applicable laws and regulations are met.

Commission Delegated Regulation (EU) 2016/522 supplements the provisions of the MAR Regulation by providing a non-exhaustive list of transactions subject to notification, including the disposal or exercise of rights (including put and call options and warrants), subscriptions in connection with capital increases or the issuance of debt instruments, as well as gifts and donations made or received and inheritances received.

The MAR Regulation and the Issuers’ Regulation provide that the notification requirements apply when, during the calendar year, the Transactions carried out individually by each

¹ The one-business-day deadline provided for under this Procedure is an internal deadline established by the Company in order to ensure the timely management of the notification requirements set out in Article 19 of the MAR Regulation, which must be fulfilled promptly and, in any event, no later than three business days following the date of the Transaction.

Relevant Person or by each Person Closely Associated with such Relevant Person reach an **aggregate amount of EUR 50,000**. For the purpose of calculating the threshold, all Transactions carried out by each person during the calendar year involving shares issued by Interpump Group S.p.A. or financial instruments linked thereto shall be aggregated, without netting. Purchases and sales shall therefore be calculated on the basis of their respective values, without netting purchases against sales. Transactions carried out by a Relevant Person shall not be aggregated with those carried out by Persons Closely Associated with such Relevant Person; likewise, Transactions carried out by different Persons Closely Associated shall be considered separately for each such person.

4. Procedures for Notification to Consob, Interpump Group S.p.A. and the Market

The Relevant Persons referred to in paragraphs (A) and (B) of Article 2 shall provide the information relating to each transaction subject to the notification requirements (hereinafter a “Transaction”), whether carried out directly on their own account, by Persons Closely Associated with them, or through third parties, no later than the day following the date on which the Transaction was carried out. The notification shall be submitted to the General Counsel and to the Head of the Internal Audit, Risk & Compliance Function, as the internal functions appointed by the Company to manage the relevant obligations, using the form made available by Consob at the following address: <https://www.consob.it/web/area-operativa-interattiva/regolamento-abusi-di-mercato>. The notification may be sent by e-mail to internalauditing@interpumpgroup.it or by fax to +39 0522 904444.

The General Counsel, including through specifically delegated persons, shall arrange for the transmission to Consob and the public disclosure of the Transactions received within the time limits prescribed by the applicable laws and regulations in force from time to time (which, as of the date of this Procedure, are equal to **3 (three) business days** from the date of the Transaction). Public disclosure shall be made through the authorised system for the dissemination and storage of regulated information adopted by the Company.

The Company shall, on behalf of the Relevant Persons and the Persons Closely Associated with them, arrange for the transmission to Consob of notifications relating to Transactions subject to the requirements set out in this Procedure, as well as for the relevant public

disclosure, within the time limits and in accordance with the procedures prescribed by the applicable laws and regulations.

The person who carried out the Transaction shall remain responsible for promptly providing the Company, within the time limit set out in this Procedure, with complete and accurate information and all documentation necessary for the relevant obligations to be fulfilled. The Company shall be responsible for managing and timely carrying out the obligations falling within its remit on the basis of the information received.

The notification submitted to the Company shall contain, where applicable, all information required under the applicable laws and regulations and the relevant regulatory form, including at least: the identity of the person who carried out the Transaction, the nature of that person's relationship with the Relevant Person, a description of the financial instrument, the nature of the Transaction, the date and place of execution, the price and volume, as well as any additional information necessary to ensure the timely fulfilment of the obligations towards Consob and the market. Notifications shall be made in a manner suitable to ensure completeness, evidence of submission and traceability.

Pursuant to Regulation (EU) 2016/679, the General Data Protection Regulation ("GDPR"), and the applicable national legislation on the protection of personal data, the personal data provided by Relevant Persons and Associated Persons shall be processed only to the extent necessary for the fulfilment of the obligations arising under the applicable laws and regulations and this Procedure. Such data may be disclosed, strictly to the extent relevant and necessary, to the competent authorities, the operators of systems for the dissemination and storage of regulated information, and the public, in accordance with the applicable laws and regulations.

Personal data shall be retained for the period necessary to fulfil the purposes for which they were collected. Data subjects may exercise the rights granted to them under the applicable laws and regulations by contacting the General Counsel of Interpump Group S.p.A.

5. Additional Conduct Requirements ("Closing Period")

Relevant Persons and Associated Persons may not, directly or indirectly, carry out, on their own account or on behalf of third parties, Transactions involving shares issued by Interpump

Group S.p.A. or financial instruments linked thereto during the 30 calendar-day period preceding the publication of the annual financial report, the half-year financial report and any additional periodic financial information (the “Closing Period”).

The Board of Directors or, in urgent cases, the Chief Executive Officer may identify additional periods or circumstances in which Transactions carried out by Relevant Persons may be subject to restrictions or prohibitions. Any such decisions shall be promptly communicated to the Relevant Persons and Associated Persons.

The above restrictions shall not apply, subject to the prior authorisation of the Chief Executive Officer of Interpump Group S.p.A., in the cases permitted under the applicable laws and regulations, where exceptional circumstances exist, such as severe financial difficulties requiring the immediate sale of shares, as well as with respect to transactions carried out under or in connection with employee share or saving schemes or rights attaching to shares, or transactions in which the beneficial interest in the relevant financial instrument does not change.

The restrictions shall also not apply to transactions or trading activities that do not involve active investment decisions by the Relevant Person, that arise solely as a result of external factors or actions by third parties, or that are based on predetermined terms, such as the automatic exercise of rights conferred by derivative instruments.

Requests for authorisation to carry out Transactions during the Closing Period shall be assessed on a case-by-case basis, in accordance with the applicable laws and regulations and the relevant interpretative guidance issued by the competent authorities, subject to the applicant providing adequate reasons and to verification that there are no circumstances inconsistent with the prohibition on insider dealing or unlawful disclosure of inside information. Where granted, the authorisation shall be issued in writing by the Chairman of the Board of Directors or, in the event of his or her absence, inability to act or conflict of interest, by the Chief Executive Officer, and shall be retained on file together with the relevant supporting documentation.

Consistently with the applicable laws and regulations and the relevant interpretative guidance, participation in duly authorised or approved corporate transactions that do not grant the Relevant Person preferential treatment compared with other shareholders may also be

considered for the purposes of granting an authorisation, it being understood that the prohibition on insider dealing shall in any event continue to apply.

6. Person Responsible for Implementing the Procedure

The General Counsel, with the support of the Internal Audit, Risk & Compliance Function, shall be responsible for the implementation of this Procedure and for overseeing the related organisational requirements.

In particular, the General Counsel, with the support of the Internal Audit, Risk & Compliance Function, shall:

- ensure that the Procedure is distributed to the Relevant Persons and, where necessary, to any other persons subject to the obligations set out herein;
- draw up and keep up to date the list of Relevant Persons and Persons Closely Associated with them, on the basis of the information available and the notifications received;
- receive notifications relating to Transactions carried out by Relevant Persons and Associated Persons and manage them in accordance with this Procedure;
- arrange for the transmission of the relevant information to Consob and for its disclosure to the public, without prejudice to the responsibility of each person subject to the relevant obligations for the proper and timely fulfilment of the requirements imposed by the applicable laws and regulations, within the time limits and in accordance with the procedures in force from time to time;
- retain the documentation relating to notifications received, notifications made, acknowledgements of the Procedure and any other requirements connected with its application;
- provide Relevant Persons with interpretative and operational support concerning the application of this Procedure, without prejudice to the responsibility of each person subject to the relevant obligations for the proper and timely fulfilment of the requirements imposed by the applicable laws and regulations in force from time to

time;

- monitor developments in the laws and regulations applicable to internal dealing and propose any amendments to the Procedure that may become necessary.

The General Counsel shall provide the person who has submitted a notification pursuant to this Procedure with confirmation of receipt, by e-mail or by any other means suitable to ensure the traceability of the communication.

6-bis Traceability, Record-Keeping and Training

The Company shall ensure appropriate arrangements for the traceability and retention of documentation relating to this Procedure, including, by way of example, notifications to Relevant Persons, acknowledgements of the Procedure, updated lists of the persons concerned, notifications received, confirmations of receipt, authorisations granted during the Closing Period and any correspondence relevant to the application of this Procedure.

The Company shall promote, in accordance with principles of proportionality and appropriateness, periodic information and training initiatives addressed to Relevant Persons and to the corporate functions involved in the application of this Procedure.

7. Sanctions

Without prejudice to any consequences provided for under the applicable laws and regulations in force from time to time, failure to comply with the notification requirements, prohibitions and other obligations set out in this Procedure may result in the application of the sanctions and other measures provided for under the MAR Regulation, the TUF and the related implementing provisions. In particular, any breach of the notification requirements relating to Transactions carried out by Relevant Persons and Persons Closely Associated with them, as well as any breach of the prohibitions on carrying out Transactions during closed periods, may give rise to the administrative sanctions provided for under the applicable laws and regulations.

It is further understood that insider dealing, unlawful disclosure of inside

information and market manipulation constitute separate violations under the applicable laws and regulations and may give rise to criminal, administrative or other forms of liability for the persons engaging in such conduct.

Where the relevant conditions are met, such conduct may also be relevant for the purposes of the administrative liability of the Company pursuant to Italian Legislative Decree No. 231/2001.

In the relationship between Interpump Group S.p.A. and the Relevant Persons, failure to comply with the obligations and prohibitions set out in this Procedure may also give rise to disciplinary consequences, in accordance with the applicable laws and regulations and the Company's internal procedures, without prejudice to any further civil, criminal or administrative liability.

8. Final Provisions

Pursuant to the MAR Regulation, the Company shall notify the Relevant Persons in writing of the obligations applicable to them under the relevant laws and regulations and this Procedure. In turn, the Relevant Persons shall notify in writing the Persons Closely Associated with them of the notification obligations applicable under the relevant laws and regulations and this Procedure and shall retain a copy of the notification so provided.

Each Relevant Person shall be required to:

- return a copy of this Procedure duly signed for receipt and acceptance;
- comply with the provisions set out in this Procedure;
- ensure, to the extent falling within his or her responsibilities, that the Persons Closely Associated with him or her are informed of the applicable obligations;
- promptly notify the General Counsel of any changes relevant for the purposes of updating the list of Relevant Persons and Persons Closely Associated with them;
- contact the General Counsel should any clarification be required regarding the application of this Procedure.



The Chief Executive Officer, upon proposal of the General Counsel, may make amendments to the Procedure of an organisational nature or amendments required to ensure compliance with directly applicable laws or regulations, provided that such amendments do not materially affect the overall framework of the Procedure or the obligations set out therein. Any material amendments to this Procedure shall instead be subject to the prior approval of the Company's Board of Directors.