



**PROCEDURE**  
**METHOD OF KEEPING AND UPDATING THE LISTS OF PERSONS**  
**HAVING ACCESS TO INSIDE INFORMATION IN INTERPUMP**  
**GROUP S.P.A.**

## **1. Introduction**

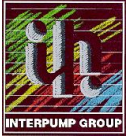
This procedure has been prepared in accordance with the provisions contained (i) in the Implementing Regulation (EU) 2016/347 of the Commission of 10 March 2016 “implementing technical standards with regard to the precise format of the lists of persons having access to inside information and its update in accordance with Regulation (EU) No. 596/2014 of the European Parliament and of the Council (hereinafter “**List**”)” (ii) in the Legislative Decree. no. 58 of 24 February 1998 (hereinafter “**T.U.F.**”) and (iii) in the Consob Regulation no. 11971 of 14 May 1998.

The Procedure (hereinafter “**Procedure**”) is associated with the following procedures:

- “Procedure for market disclosure of privileged information and documents relative to Interpump Group S.p.A. and the financial instruments it has issued”;
- “Procedure related to the identification of relevant parties and notification of transactions performed by them, also through intermediaries, in relation to shares issued by Interpump Group S.p.A. or other financial instruments linked to them (“**Internal dealing procedure**”).”

The Procedure, effective from 3 July 2016, has been amended on 4 October 2021 and is published on the Interpump Group S.p.A. website at [www.interpumpgroup.it](http://www.interpumpgroup.it).

## **2. Persons or legal entities included in the List ("Parties")**



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The list is divided into two different sections:

- one for each of inside information as defined in Article 7) of Regulation (EU) no. 596/2014 (**occasional section**)
- a supplementary section which includes the details of the persons who always have access to inside information (**permanent section**).

The list is prepared and updated in an electronic format, which ensures:

1. the confidentiality of the information contained in the list, ensuring that access to it is limited to those clearly identified at the issuer, or any other person acting on their behalf or for their account, which must be accessed by the nature of their function or position;
2. the accuracy of the information contained in the list;
3. access and retrieval of previous versions of the list;

The “Occasional” Section of the Register contains the name or company name:

- a. of the Vice Chairman, of the Directors, of the Chairman of the Board of Statutory Auditors and of the Statutory Auditors of Interpump Group S.p.A.;
- b. of the Product General Managers, the Head of the Investor Relations Department and the Head of the Internal Audit, Risk & Compliance;
- c. of employees of Interpump Group S.p.A. who, in relation to their specific duties, have access to inside information on an occasional basis;
- d. of the consultants who provide their professional services on the basis of a consultancy relationship having a duration of less than one year and who have access to inside information;
- e. of employees reporting directly to the parties indicated above under letter d).

The “Permanent” Section of the Register contains the name or company name:

- f. of the Chairman of the Board of Directors, of the Chief Executive Officer and of the Secretary of the Board of Directors;



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- g. of the managers and employees who have access to privileged information on a regular basis, including the Manager responsible for preparing the company's financial reports, the C.F.O., the General Counsel and the Executive Secretary of the Chairman of the Board of Directors.

With regard to the disclosure of inside information we invite you to refer to the "*Procedure for market disclosure of inside information and the documents concerning Interpump Group S.p.A. and the financial instruments it has issued*".

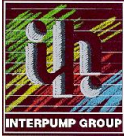
### **3. Method of keeping the Register**

The Register is kept by the General Counsel, with the support of the Head of Internal Audit, Risk & Compliance of Interpump Group S.p.A., who establishes, retaining the relative evidence, the criteria adopted in keeping the register and the methods of management and research of the information it contains, in such a way as to ensure easy access, management, consultation, retrieval and printing.

The General Counsel, with the support of the Head of Internal Audit, Risk & Compliance, ensures that the Register is updated promptly at the time of reception of communication of a change in the information it contains.

The "Occasional" Section of the list contains the following information:

- date and time of creation of the list section i.e. when the inside information has been identified;
- date and time of the last update of the section;
- date of transmission to the competent authority;
- name and surname of the person who has access to inside information. Where applicable, birth surname of the party who is authorized to access (if different from the surname);
- professional telephone numbers (fixed and mobile direct line);
- company name and address;
- function and reason of access to inside information;



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- date and time on which the holder has obtained access to inside information;
- date and time on which the holder has stopped having access to inside information;
- date of birth, national identification number (tax ID or for foreign countries, similar reference, where available);
- private telephone numbers (home and/or personal cell phone) and
- complete home address (street, number, locality, postal code, Nation).

The “Permanent” Section of the list contains the following information:

- date and time of creation of the permanent access section;
- date and time of the last update of the section;
- date of transmission to the competent authority, where made or envisaged;
- name and surname of the person who has access to inside information. Where applicable, birth surname of the party who is authorized to access (if different from the surname);
- professional telephone numbers (fixed and/or mobile direct line);
- company name and address;
- function and reason of access to inside information;
- date and time on which the holder has obtained access to inside information;
- date of birth, national identification number (tax ID or for foreign countries, similar reference, where available);
- private telephone numbers (home and/or personal cell phone) and
- complete home address (street, number, locality, postal code, country).

The information concerning the Parties is retained for a period of five years from the time that the circumstances that caused their entry or updating are no longer applicable.

### **3.1 Steps to perform for implementation of the Register**



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To make the implementation and updating of the Register more effective:

1. the Persons specified under letters from f) to g) in heading 2 promptly inform the General Counsel and the Head of Internal Audit, Risk & Compliance in writing of information concerning: the consultants and employees to be entered in the “Occasional” Section”;
2. the General Counsel, with the support of the Head of the Internal Audit, Risk & Compliance, ensures the data and information required for updating of the Register with regard to the persons indicated under the letters from a) to g) of heading 2 are accurate and prompt.

Without delay, the General Counsel, with the support of the Head of Internal Audit, Risk & Compliance, sends the party in question notification of the entry in the Register, cancellation of the record, and the updates of the information contained in the Register. The General Counsel, with the support of the Head of Internal Audit, Risk & Compliance, also communicates the obligations that ensue on gaining access to inside information and the penalties established for offenses or in the cases of unauthorized diffusion of inside information.

The Regulations also require issuers, or persons acting for or on their behalf, to take "all reasonable steps" to ensure that all persons on the list of persons with access to inside information take a written acknowledgment of the related legal and regulatory obligations and are aware of the penalties applicable in cases of abuse and unlawful disclosure of inside information.

The parties adopt suitable measures to prevent access to the Information by persons other than those for whom access is necessary in order to execute the functions assigned to them. Specifically, they obtain, manage and file inside information only if strictly necessary to execute their work assignments and exclusively for the necessary time, adopting all the normal rules of professional diligence in order to guarantee the maximum confidentiality. Consultants are required to sign confidentiality undertakings in relation to the management of confidential information.



#### **4. 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, 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 231/01.

Moreover, failure to observe the obligations and prohibitions prescribed by the present Procedure by Company employees may result in the application of disciplinary penalties, without prejudice to the application of broader responsibilities.

#### **5. Final provisions**

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.