

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

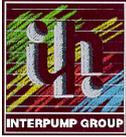
1. Introduction

This procedure has been prepared in accordance with the current provisions, in particular: (i) in the Implementing Regulation (EU) 2022/1210 of the Commission of 13 July 2022 “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” (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 recently amended on 6 August 2025 and is published on the Interpump Group S.p.A. website (hereinafter “**Interpump**” or “Company”) at www.interpumpgroup.it.



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

The List of persons having access to inside information (hereinafter “**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 List contains the name or company name:

- a. of the Vice Chairman, of the Members of the Board of 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 List contains the name or company name:



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- f. of the Chairman of the Board of Directors, of the Chief Executive Officer and of the Secretary of the Board of Directors;
- 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 *Chief Financial Officer*, the *General Counsel* and the Executive Secretary of the Chairman of the Board of Directors.

With regard to the disclosure of inside information, please 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*".

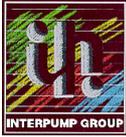
3. Method of keeping the Register

The List is kept by the *General Counsel* of Interpump Group S.p.A., with the support of the Head of *Internal Audit, Risk & Compliance*. These entities establish, retaining the relative evidence, the criteria adopted in keeping the List 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 without delay upon receipt of a notification involving a change to 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 was 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 (including, where different, from the surname at birth);
- professional telephone numbers (fixed and mobile direct line);
- company name and address;



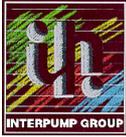
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- function and reason of access to inside information;
- date and time when the holder obtained access to inside information;
- date and time when the holder has stopped having access to inside information;
- date of birth, national identification 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, house number, city, postal code, country).

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 carried out or envisaged;
- name and surname of the person who has access to inside information (including, where different, the last name at birth);
- professional telephone numbers (fixed and/or mobile direct line);
- company name and address;
- function and reason for accessing 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);
- complete home address (street, number, city, postal code, country).

The information concerning the Parties included in the List is retained for a period of five years from the date on which the circumstances that led to their inclusion or update cease to exist.



3.1 Steps to perform for implementation of the List

To make the implementation and updating of the List 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*, supported by the Head of the *Internal Audit, Risk & Compliance*, ensures that the data and information required to update the List in regard to the persons indicated under the letters from a) to g) of heading 2 are accurate and transmitted in a prompt manner.

The *General Counsel*, with the support of the Head of *Internal Audit, Risk & Compliance*, notifies the parties concerned without delay of their inclusion in the List, their cancellation from the record, and any updates to the information contained in the List. In addition, the *General Counsel* informs the parties concerned of their obligations arising from access to inside information and the penalties applicable in the event of unlawful acts or unauthorized disclosure of inside information.

The Regulation requires the Company, or persons acting in its name or on its behalf, to take "all reasonable measures" to ensure that all persons included in the List acknowledge in writing the legal and regulatory obligations relating to access to inside information and are aware of the penalties applicable in the event of misuse or unlawful disclosure of such information.

The parties involved adopt appropriate measures to prevent access to inside information by persons other than those who need it for the performance of their assigned duties. In particular, inside information has to be obtained, managed and filed only if strictly necessary to execute their work assignments and for the time strictly necessary, in compliance with all the rules of professional diligence and to ensure maximum confidentiality. Consultants are required to sign specific confidentiality undertakings in relation to the management of confidential information.



4. Penalties

Without prejudice to the legal and regulatory consequences provided for non-fulfillment of the obligations specified in the art. 114 of TUF and the applicable provisions of the Issuers' Regulation, the misuse of inside information and market manipulation are penal and administrative offenses punishable by law against those responsible. Such conduct may also give rise to the administrative liability of the Company pursuant to legislative decree 231/2001.

Moreover, failure by Company employees to comply with the obligations and prohibitions prescribed by the present Procedure may constitute a disciplinary offense, without precluding the possibility of further civil, penal, or administrative liability.

5. Final provisions

The Chief Executive Officer ensures that the necessary amendments and additions are made to this Procedure following regulatory or legislative updates and significant organizational changes within Interpump Group S.p.A.