

## Stevanato Group

### RELATED PARTY TRANSACTIONS POLICY

Version 1

Adopted on July 2, 2021,

Modified by the Board of Directors on May 6, 2022

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#### 1. INTRODUCTION

This related party transactions policy (hereinafter "**Policy**") identifies the rules that govern the approval and execution of transactions with related parties carried out by Stevanato Group S.p.A. and its subsidiaries and affiliates (hereinafter, collectively, "**Stevanato Group**" or "**Group**") as required by Item 404(b) of Regulation S-K of the Securities Act of 1933 (the "Act").

The purpose of this Policy is to ensure the transparency of the approval process and the information requirements in order to guarantee the fairness in the conduct of transactions with related parties.

In any event, Stevanato Group S.p.A. shall not directly or indirectly, including through any subsidiary, extend or maintain credit to, or arrange for the extension of credit, or renew an extension of credit, in the form of a personal loan to or for any Director or executive officer (or equivalent thereof) of Stevanato Group.

#### 2. DEFINITIONS

For purposes of this Policy, the following definitions apply:

"**Audit Committee**" means the committee designated by the Board of Directors of Stevanato Group S.p.A.

"**Board of Directors**" means the Board of Directors (*Consiglio di Amministrazione*) of Stevanato Group S.p.A.

"**Policy**" means this Related Party Transactions Policy.

"**Related Party**" means (a) enterprises that directly or indirectly through one or more intermediaries, control or are controlled by, or are under common control with, Stevanato Group; (b) associates; (c) individuals owning, directly or indirectly, an interest in the voting power of Stevanato Group that gives them significant influence over Stevanato Group, and close members of any such individual's family; (d) key management personnel, that is, those persons having authority and responsibility for planning, directing and controlling the activities of Stevanato Group, including directors and senior management and close members of such individuals' families; and (e) enterprises in which a substantial interest in the voting power is owned, directly

or indirectly, by any person described in (c) or (d) or over which such a person is able to exercise significant influence. This includes enterprises owned by directors or major shareholders of Stevanato Group and enterprises that have a member of key management in common with Stevanato Group. “*Close members of an individual’s family*” are those that may be expected to influence, or be influenced by, that person in their dealings with the company. An “*associate*” is an unconsolidated enterprise in which the company has a significant influence or which has significant influence over the company. “*Significant influence*” over an enterprise is the power to participate in the financial and operating policy decisions of the enterprise but is less than control over those policies. Shareholders beneficially owning a 10% interest in the voting power of a Group company are presumed to have a significant influence on the company.

“**Related Party Transaction**” means, in any given fiscal year, transactions or loans between the Stevanato Group and a Related Party that are unusual in their nature or conditions, involving goods, services, or tangible or intangible assets, to which the company or any of its parent or subsidiaries was a party.

“**Transaction**” means any financial transaction, arrangement or relationship or any series of similar transactions, arrangements or relationships. The term also includes indebtedness and guarantees of indebtedness and transactions involving employment and similar relationships.

### 3. ROLES AND RESPONSIBILITIES

Subject to the requirements of this Policy, any Related Party Transaction must be approved or ratified by the Audit Committee, which is composed of independent directors appointed by the Board for this purpose.

The Audit Committee shall be responsible for determining whether a transaction is a Related Party Transaction requiring review under this Policy, including whether the Related Party has a material interest, based on a review of all facts and circumstances related thereto.

The Process and Procedure Manager is responsible for monitoring the Group’s Transactions in order to verify the existence of potential Related Party Transactions and to notify the Audit Committee.

### 4. PROCEDURE

#### 4.1. Identification of Related Party Transactions

The Process and Procedure Manager conducts a prior review of all known Transactions, arrangements and relationships in which the Group and a Related Party are participants to determine whether such Transactions, arrangements and relationships constitute Related Party Transactions.

Each director, nominee for director, and executive officer of Stevanato Group shall promptly notify the Process and Procedure Manager of any potential Transaction involving the Group or a company of the Group and a Related Person. The notice shall include a complete description of the potential Transaction including:

- the name of the Related Person and the basis on which the person is a Related Person;

- the Related Person's interest in the Transaction with the Company, including its position(s) or relationship(s) with, or ownership in, a firm, corporation, or other entity that is a party to, or has an interest in, the Transaction;
- the approximate value of the amount involved in the Transaction;
- any other relevant information regarding the Transaction or the Related Person in the context of the Transaction.

#### **4.2. Review of Potential Related Party Transactions**

The Process and Procedure Manager will present any Related Party Transactions and proposed Transactions involving Related Party to the Audit Committee.

Audit Committee shall review potential Transactions to determine whether the Related Party involved has a direct or indirect material interest in the Transaction.

In reviewing the Transaction or proposed Transaction, the Audit Committee shall consider all relevant facts and circumstances, including without limitation the commercial reasonableness of the terms, the benefit and perceived benefit, or lack thereof, to the Group, opportunity costs of alternate transactions, the materiality and character of the Related Party's direct or indirect interest, and the actual or apparent conflict of interest of the Related Party.

#### **4.3. Approval of Related Party Transactions**

The Audit Committee shall conduct a reasonable prior review and oversight of all related party transactions for potential conflicts of interest before the Stevanato Group entering into such transaction, in accordance with the guidelines set forth in this Policy.

The Audit Committee will prohibit a Related Party Transaction such a transaction if it determines, upon consideration of all relevant information, that such Transaction is inconsistent with the interests of Stevanato Group and its stockholders. Any member of the Committee who has a potential interest in any Related Party Transaction will recuse himself or herself and abstain from voting on the approval of the Related Party Transaction, but may participate in all or a portion of the Committee's discussions of the Related Party Transaction, if requested by the Chair of the Committee.

In the event Stevanato Group becomes aware of a Related Person Transaction that has not been approved under this Policy, the Transaction shall be reviewed by the Audit Committee as promptly as practicable. The Audit Committee shall consider all relevant facts and circumstances respecting such Transaction and shall evaluate all options available to the Group, including possible ratification, revision or termination of such Transaction, and Stevanato Group shall take such action as the Audit Committee deems appropriate under the circumstances.

### **5. REPORTING VIOLATIONS**

In order to ensure the effectiveness of this Policy, the Audit Committee supervises the compliance of this Policy with the requirements of applicable regulations, as well as its observance, reporting any violations to the Board.

Each company of the Group shall implement organizational verification and monitoring measures to ensure compliance with this Policy.

## **6. DISCLOSURE OF THE POLICY**

Each company of the Group undertakes to communicate this Policy to its employees and all interested parties for the correct interpretation of its contents and to the provision of tools to facilitate its application.

Moreover, this Policy is available on Stevanato Group S.p.A.'s website and is referred to, by means of a reference to the same website, in the annual report, where information is provided on the Related Party Transactions carried out during the reference financial year, as well as on any change or development thereof.

## **7. POLICY APPROVAL, REVIEW AND UPDATE**

This Policy is approved by the Board of Directors of the Stevanato Group S.p.A. and applies to any companies of Stevanato Group.

Stevanato Group will consider making any revisions and/or updates to this Policy, taking into account any changes in applicable laws and regulations, the effectiveness of the Policy in practice and any changes in the corporate structure of the Group.