



Related Party Transactions Policy

VERSION	3
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1. Objective

This policy (the “**Policy**”) was adopted on March 3rd, 2026 by resolution of the Board of Directors of Stevanato Group S.p.A. (the “**Company**”), following the favourable opinion of the Independent Directors (as defined below) of the Company, pursuant to Article 2391-*bis* of the Italian Civil Code and regulation on related parties transactions adopted by Consob with resolution no. 17221 of 12 March 2010, as subsequently amended and supplemented (the “**RPT Regulation**”) (1).

The Company adopted and applies the Policy taking into account, *inter alia*, Consob Communication no. DEM/10078683, of 24 September 2010, on “*Guidance for the application of the Regulation on related parties transactions adopted with resolution no. 17221 of 12 March 2010 as subsequently amended*” (the “**Implementing Communication**”), as well as Section 314.00 of the New York Stock Exchange (“**NYSE**”) Listed Company Manual and Item 7.B of Form 20-F.

For any matter not expressly governed by the Policy, reference is made to the laws and regulations applicable to the Company, including US laws and the regulations of the NYSE.

2. Scope

This Policy applies to all Stevanato Group subsidiaries.

3. Definitions

The following definitions in bold have the meanings set out below:

Board of Directors: the board of directors of the Company in office from time to time.

Committee: the audit committee (*comitato per il controllo sulla gestione*) of the Company in office from time to time.

Compliance Director: the corporate function of the Company, appointed by the Board of Directors upon proposal of the Chairman, in charge for Related Parties Transactions and assisting the Board of Directors in the fulfilment of obligations related to compliance with the Policy.

Directors Involved in the Transaction: directors who have an interest in the transaction, on their own behalf or on behalf of third parties, that conflicts with that of the Company.

Independent Directors: directors who satisfy the independence requirements provided for pursuant to Article 2399 of the Italian Civil Code and by US law, as well as by regulations of the NYSE applicable to the Company.

Independent Expert: any natural or legal person who satisfies the requirements of professionalism, integrity and independence required by the mandate. Independence is verified by the Committee prior to the appointment, having particular regard to any economic, equity and financial relationships between the expert and **(i)** the Related Party, its subsidiaries, its controlling persons, entities under common control, as well as the directors of any of the foregoing; **(ii)** the Company, the Subsidiaries, the controlling persons of the Company, the entities under common control with the Company, as well as the directors of any of the foregoing. Independence shall be confirmed by a declaration issued by the Independent Expert at the time of the appointment.

(1) The Company is subject to the obligation set out in Article 2391-*bis* of the Italian Civil Code as a company with shares listed on a regulated market pursuant to Article 2325-*bis* of the Italian Civil Code and Article 3.2 of the by-laws of the Company.

Low Value Transactions: transactions entered into with any counterparty, whether a legal or natural person, the value of which does not exceed Euro 1.000.000 (where the counterparty is a legal person) or Euro 300.000 (where the counterparty is a natural person) (together, the “**Low Value Transaction Limits**”).

Market or Standard Terms: transactions entered into on terms comparable to those customary applied to unrelated parties for transactions of the same nature, size and risk, or based on regulated tariffs or mandated prices, or those charged to parties with whom the Company is required by law to contract for a mandatory fee.

Ordinary Transactions: transactions that fall within the ordinary course of the Company’s operating activities and related financial activities. In determining whether a transaction qualifies as “ordinary”, the criteria set forth in paragraph 3 of the Implementing Communication shall be taken into account.

Related Parties: with respect to the Company and/or its Subsidiaries, those entities that qualify as related parties under the international accounting standards in force from time to time.

Related Party Transactions: transactions qualified as such under the international accounting standards in force from time to time, as adopted in accordance with the procedure referred to in Article 6 of Regulation (EC) No. 1606/2002.

Shareholders’ Meeting: the ordinary or extraordinary shareholders’ meeting of the Company.

Significant Interests: the interests arising from shareholdings or equity relationships between the Companies controlled by, or associated with, the Company and other Related Parties of the Company that are counterparties to a given Related Party Transaction, where the aforementioned relationships are capable of directing, exclusively or primarily, the management decisions of the Company, of a Subsidiary or of an affiliated company to serve the interest of the Related Party of the Company. For the purposes of assessing the significance of such interests, consideration shall be given, *inter alia*, to: **(i)** the existence of any shareholding relationships between the Company’s Subsidiary or affiliated company and other Related Parties of the Company or any financial relationships between the Company’s Subsidiary or affiliated company and other Related Parties of the Company; **(ii)** the criteria set out in paragraph 21 of the Implementing Communication. Significant Interests do not include interests arising solely from the mere sharing of one or more directors or, if any, other executives with strategic responsibilities between the Company and its Subsidiaries or affiliated companies.

Subsidiaries: the companies, Italian or foreign, controlled by the Company pursuant to Article 2359 of the Civil Code.

Transactions of Greater Significance: transactions that qualify as such on the basis of (i) the thresholds and criteria set out in Annex 3 to the RPT Regulation and in the Implementing Communication (these thresholds, the “**Thresholds of Greater Significance**”) or, alternatively, (ii) an evaluation, to be conducted on a case-by-case basis - at the Committee’s discretion - having regard to factors such as, by way of example, the nature, size, terms, counterparties, and/or the potential impact of the Related Party Transaction on the Company and its stakeholders (the “**Materiality Factors**”), as a result of which the Committee determines that a transaction that would otherwise be classified as a Transaction of Lesser Significance or a Low Value Transaction should instead be treated as a Transaction of Greater Significance.

Transactions of Lesser Significance: all Transactions with Related Parties other than Transactions of Greater Significance and Low Value Transactions.

Unrelated Directors: directors other than the counterparty to the relevant Related Party Transaction and its Related Parties

Unrelated Shareholders: persons entitled to exercise voting rights other than (a) the counterparty to the relevant Related Party Transaction and (b) the Related Parties of (i) both the counterparty to the relevant Related Party Transaction (ii) and the Company

4. Guidelines

4.1. Circulation and Monitoring of the Application of the Policy

4.1.1. Circulation

The Compliance Director distributes the Policy to the members of the corporate bodies, as well as to the main corporate functions of the Company.

The Policy is also distributed, by the Compliance Director, to the members of the administrative bodies and (if any) of the control bodies of the Subsidiaries and to the main corporate functions thereof, so that these persons can review it and, to the extent of their competence or responsibility, comply with it, to ensure the effectiveness of the processes governed by the Policy itself within the group headed by the Company (the “**Group**”).

The Policy, in the version in force from time to time, is published on the Company’s website in the “Governance” section and, also by reference to the website, in the annual report on operations, pursuant to Article 2391-*bis* of the Italian Civil Code, where information is also provided on transactions carried out with related parties.

4.1.2. Monitoring of the application of the Policy

To ensure the effectiveness of the Policy, the Committee monitors compliance with the requirements of the applicable regulations, as well as reports any violations to the Board of Directors.

Each Group company adopts the appropriate organisational monitoring and verification measures to ensure compliance with the Policy.

4.2. Identification of Related Parties Transaction

The bodies of the Company or its Subsidiaries or the persons acting on behalf of the Company or its Subsidiaries (the “**Bodies**”) who are competent for the approval and/or execution of the relevant transaction, before entering into the relevant negotiations with the counterparty (if applicable), must verify, with the support of the Compliance Director (if necessary), whether the potential transaction qualifies as a Related Party Transaction.

In the event that the potential transaction qualifies as a Related Party Transaction and does not fall under any of the exemptions referred to in Article 9 below, these Bodies shall promptly involve the Committee and send to the Chairman of the Committee, possibly with the support of the Compliance Director, a notice containing at least the following information:

- a) The identifying data of the counterparty and the nature of its relationship to the Company or to any other individual or entity relevant for the purposes of this Policy (the “**Related Party Relationship**”);
- b) The type and object of the transaction;
- c) An assessment of Company’s interest in completing the transaction;
- d) Any other useful information enabling the Committee to assess the nature and value of the transaction.

Together with the aforementioned notice, any document relating to the transaction available at that time shall be provided.

If the conditions of the transaction are defined as Market or Standard Terms, the documentation provided shall contain objective supporting evidence.

Without delay and, in any case, within 10 (ten) days of receipt of the notice, the Chairman of the Committee shall convene the Committee to carry out an appropriate review of the transaction.

During the meeting so convened, the Committee shall, *inter alia*, determine whether the Related Party Transaction qualifies **(a)** as a Transaction of Lesser Significance or **(b)** as a Transaction of Greater Significance, and, in the latter case, whether it is so qualified on the basis *(b.1)* of the Thresholds of Greater Significance or *(b.2)* of the Committee's assessment on the Materiality Factors.

If the Committee determines that the transaction qualifies as a Transaction of Greater Significance, the minutes of the Board of Directors meeting approving such transaction shall include a substantiated written statement setting out the reasons for the Committee's determination, including its materiality evaluation and the basis therefor.

The Chairman of the Board of Directors, with the support of the Compliance Director, shall also inform the Committee whether the information relating to the transaction is likely to have a material effect on the Company's share prices listed on the NYSE.

4.3. General Principles for the approval of transaction with Related Parties

Related Party Transactions shall be approved by the competent corporate Bodies of the Company and its Subsidiaries in accordance with the provisions set forth in this Policy.

In the event that the Committee is involved in the approval of a Related Party Transaction, it shall be composed exclusively of Independent Directors who are not Related Parties with respect to the specific Related Party Transaction under review.

Should any member of the Committee be a Related Party in connection with the Related Party Transaction under examination, such member shall be precluded from participating in the Committee's deliberations. In such case, the following provisions shall apply:

- a) In the event that one or more Independent and Unrelated Directors with respect to the Related Party Transaction under examination are members of the Board of Directors, the Committee shall be supplemented - solely for the purposes of reviewing the specific Related Party Transaction - by the longest-serving Independent and Unrelated Director;
- b) In the event that there are no members of the Board of Directors who are Independent and Unrelated Directors with respect to the Related Party Transaction under examination, and the Committee includes at least 2 (two) Directors who are Unrelated with respect to the Related Party Transaction under review, the Committee shall adopt its determinations concerning the Related Party Transaction unanimously among such members;
- c) In the event that there are no members of the Board of Directors who are Independent and Unrelated Directors with respect to the Related Party Transaction under that there are no members of the Board of Directors who are Independent and Unrelated Directors with respect to the Related Party Transaction under.

In any event, in the performance of its duties, the Committee may avail itself of one or more Independent Experts.

Where the transaction falls within the competence of the Board of Directors, the Directors Involved in the Transaction shall issue the declaration required pursuant to Article 2391 of the Italian Civil Code and shall abstain from voting thereon. The presence of such Directors shall be counted solely for the purposes of determining the quorum required for the adoption of the relevant resolution.

In any case, the Board of Directors of the Company shall retain exclusive authority (with any Directors Involved in the Transaction abstaining) to adopt any decision and/or resolution concerning: **(i)** transactions carried out under non-market conditions; and **(ii)** Transactions of Greater Significance.

4.4. Policy for Related Parties Transactions

4.4.1. Transactions of Lesser Significance

Transactions of Lesser Significance that are not within the competence of the Shareholders' Meeting are approved by the competent Body in accordance with the Company's internal governance rules and the provisions of Article 4.3 above, subject to the reasoned non-binding opinion of the Committee. This opinion shall be annexed to the minutes of the meeting of the Committee.

To this end, having ascertained the potential relevance of the transaction pursuant to the RPT Regulation and this Policy, the Compliance Director shall promptly notify the competent Body for its approval; the latter, through the Compliance Director, shall inform the members of the Committee without delay so that they can confirm if the transaction is to be qualified as a Related Party Transaction pursuant to this Policy.

For the purposes of its assessments and the issuance of its opinion, the Committee shall receive complete, adequate, and up-to-date information.

In the event that the proposed transaction constitutes a Related Party Transaction, the Committee shall issue, in time for the adoption of the appropriate resolutions relating to the Related Party Transaction, a substantiated written opinion setting out the reasons for the Committee's determination, promptly providing the competent Body for approval with adequate information on the review activities conducted.

If, as a result of the above activities, the economic conditions of the Related Party Transaction are defined as Market or Standard Terms, the documentation prepared by the Committee must contain objective supporting evidence.

The Committee must also transmit to the competent Body for approval any other opinions acquired in relation to the transaction from external advisors, if any.

In the event of a negative opinion of the Committee, the Transaction of Lesser Significance may only be approved by the Board of Directors.

In the event of a Transaction of Lesser Significance falling within the competence of the Board of Directors or, in any case, submitted to the approval of the Board of Directors, during the meeting of the Board of Directors called to approve the Transaction of Lesser Significance, each member of the Board of Directors may request clarifications from the Committee regarding the opinion expressed; the Committee (in the person of the Chairman) shall respond during the meeting, also with the support of the Independent Expert of the Committee, if any, should the latter be invited to participate in the meeting of the Board of Directors.

In the event of a negative opinion from the Committee, the Board of Directors, with the support of the Compliance Director, shall prepare and make available to the public within 15 (fifteen) days from the end of each quarter of the financial year at the Company's registered office and in the manner provided for by the regulations applicable to the Company, a document containing the indication of the counterparty, the object and consideration of these transactions as well as the reasons why it was decided not to share this opinion. Within the same period, the opinion shall be made available to the public as an annex to the aforementioned document or on the Company's website.

In the event the Board of Directors approves the Related Party Transaction, the minutes shall contain adequate justification regarding the Company's interest in carrying out the Related Party Transaction as well as the appropriateness and substantial fairness of the relevant conditions

4.4.2. Transactions of Greater Significance

Transactions of Greater Significance that are not within the competence of the Shareholders' Meeting shall be approved by the Company's Board of Directors, subject to the reasoned favourable opinion of the Committee.

The Committee is promptly involved in the negotiation phase and in the review of the Transaction of Greater Significance through the receipt of a complete, timely and up-to-date flow of information from time to time, with the right to request information and make observations from the Bodies in charge of conducting the negotiations or reviewing the transaction. If the transaction is an Ordinary Transaction and the conditions of the transaction are defined as Market or Standard Terms, the documentation prepared shall contain objective supporting evidence.

As a result of the review of the Transaction of Greater Significance and, in any case, prior to the meeting of the Board of Directors convened to approve the Transaction of Greater Significance, the Committee shall issue a reasoned opinion on the existence of an interest of the Company in the completion of the Transaction with a Related Party and on the appropriateness and substantial fairness of the relevant conditions. The opinion shall contain a clear indication of whether or not the Committee is in favour of the completion of the Related Party Transaction. This opinion shall be annexed to the minutes of the meeting of the Committee.

During the meeting of the Board of Directors convened to approve the Transaction of Greater Significance, each member of the Board of Directors may request clarifications from the Committee regarding the opinion expressed; the Committee (in the person of its Chairman) shall respond during the meeting, also with the support of the Independent Expert of the Committee, if any, should the same be invited to participate in the meeting of the Board of Directors.

The minutes of the meeting of the Board of Directors at which the Related Party Transaction is approved shall contain adequate justification as to the Company's interest in carrying out the same, as well as the appropriateness and substantial fairness of the relevant conditions.

In accordance with US laws and regulations applicable to the Company, in the event of a negative opinion of the Committee, the Board of Directors may not submit the Related Party Transaction to the Shareholders' Meeting for authorisation pursuant to Article 2364, paragraph 1, no. 5, of the Italian Civil Code.

4.4.3. Transactions falling within the competence of the Shareholders' Meeting

Where a Related Party Transaction falls within the competence of the Shareholders' Meeting, the provisions set forth under Articles 6.1 and 6.2 shall apply, *mutatis mutandis*, to the review and approval phases of the proposal to be submitted by the Board of Directors to the Shareholders' Meeting.

Transactions of Greater Significance falling within the competence of the Shareholders' Meeting shall be approved by the favorable vote of the majority required by law and the by-laws for the adoption of the relevant resolution, provided that the Committee has issued a favorable opinion on the Transaction of Greater Significance

4.5. Transaction carried out through subsidiaries

Transactions with Related Parties carried out through Subsidiaries pursuant to Article 2359 of the Italian Civil Code are examined and approved in advance by the Body that would be competent based on the criteria set out in the Policy in case of Transactions with Related Parties carried out by the Company.

To this end, the relevant Subsidiary shall send, before the completion of the proposed transaction, a communication to the Compliance Director containing all the information and documents necessary for the examination of the proposed transaction, indicating, in particular, the counterparty, the nature and reasons for the potential correlation, the object, the economic conditions and the timing of the proposed transaction, as well as the underlying interests and rationale.

The provisions of Article 4.2 above and, with the necessary adaptations and as the case may be, the provisions of Articles 4.4.1 and 4.4.2 above or, for transactions falling within the competence of the shareholders' meeting of the Subsidiary, the provisions of Article 4.4.3 above shall apply.

4.6. Framework Resolutions

Similar Related Party Transactions with certain Related Parties, identified from time to time by the Board of Directors, to be carried out also through Subsidiaries, may be approved by means of framework resolutions.

Without prejudice to the disclosure obligations to be complied with pursuant to Article 10 below, within the terms and in the manner indicated therein, the principles set out in Article 5 above and the provisions of Articles 4.4.1 and 4.4.2 above, shall apply to such resolutions depending on the foreseeable maximum amount of the Transactions with Related Parties subject to the resolution, cumulatively considered.

The framework resolutions adopted pursuant to this Article 4.6 may not be effective for more than 1 (one) year and must refer to sufficiently specific transactions, reporting at least the foreseeable maximum amount of Transactions with Related Parties to be carried out in the reference period and the rationale for the conditions envisaged.

For the avoidance of doubt, the provisions of Articles 4.4.1 and 4.4.2 above do not apply to the individual Related Party Transactions which fall within the scope of the framework resolution.

Following the approval of a framework resolution, if the foreseeable maximum amount of the Related Party Transactions covered by the same resolution exceeds a Threshold of Greater Significance, the Company publishes the relevant information in the manner provided for by the regulations applicable to the Company.

Related Party Transactions which fall within the scope of a framework resolution and are subject to disclosure pursuant to Article 4.8.2 are not considered for the purposes of Article 5, paragraph 2, of the RPT Regulation.

The Chairman of the Board of Directors, with the support of the Compliance Director, provides the Board of Directors with complete information at least quarterly on the implementation of the framework resolutions.

4.7. Exemption Cases

Without prejudice to the disclosure obligations provided for in Article 10 below, within the terms and in the manner indicated therein, the provisions of the Policy shall not apply to:

- a) Unless otherwise qualified by the Committee as a Transaction of Greater Significance, Low Value Transactions, it being understood that the exclusion referred to in this letter (a) does not apply to transactions that are similar to each other or carried out by virtue of a single overall plan (the "**Similar or Linked Transactions**") carried out between the Company and/or one or more Subsidiaries with the same Related Party or with Related Parties of both the latter and the Company, which, cumulatively considered, exceed the Low Value Transactions Limits;
- b) Transactions approved by the Shareholders' Meeting or the Board of Directors of the Company and addressed to all shareholders on equal terms, including: **(i)** capital increases with the issue of new shares with pre-emptive rights, including to service convertible bonds, pursuant to Article 2441, paragraphs 1-3, of the Italian Civil Code, and capital increases pursuant to Article 2442 of the Italian Civil Code; **(ii)** demergers, total or partial, which provide for a criterion for the allocation of the shares of the beneficiary company to the shareholders of the demerged company proportional to the shares held by them; and **(iii)** reductions in the share capital through reimbursement to shareholders pursuant to Article 2445 of the Civil Code;

- c) Resolutions of the Shareholders' Meeting concerning **(i)** the determination of the remuneration of the members of the Board of Directors and the Committee pursuant to Article 2389, first paragraph, of the Italian Civil Code; and **(ii)** the approval of remuneration plans based on financial instruments for directors, employees or collaborators of the Company and/or its Subsidiaries together with the relevant implementing transactions;
- d) Resolutions of the Board of Directors concerning: **(i)** the determination of the remuneration for directors holding special offices, within the overall amount previously established by the Shareholders' Meeting pursuant to Article 2389, paragraph three, of the Italian Civil Code; and **(ii)** the determination of the remuneration for directors holding special offices and for other executives with strategic responsibilities (as defined in the RPT Regulation), provided that such remuneration is consistent with the remuneration policy and/or the criteria established by a committee of the Board of Directors composed exclusively of non-executive directors, the majority of whom are Independent Directors;
- e) Related Party Transactions that must be carried out on an urgent basis, other than those falling within the competence of the Shareholders' Meeting, it being understood that: **(i)** where the Related Party Transaction to be carried out falls within the competence of a director holding delegated powers, if such director determines that it is impractical or undesirable to wait until a full meeting of the Committee to approve the Related Party Transaction, the Chairman of the Committee must be informed promptly of the reasons for the urgency; **(ii)** the Related Party Transaction - without prejudice to its effectiveness - must subsequently be submitted for a non-binding resolution at the first available ordinary Shareholders' Meeting; **(iii)** the following documents must be made available to the Shareholders' Meeting, in the manner and terms provided for by applicable law and by the Company's by-laws: **(x)** a report of the Board of Directors highlighting the reasons for the urgency of the Related Party Transaction and **(y)** a report of the Committee setting out the Committee's assessments of the existence of such reasons for the urgency; and **(iv)** by the day following that of the Shareholders' Meeting, the Company shall make available to the public information on the results of the vote in the manner provided for by law applicable to the Company, with particular regard to the total number of votes cast by Unrelated Shareholders;
- f) Ordinary Transactions that are carried out at Market or Standard Terms, it being understood that: **(i)** the competent Body to resolve and/or execute the transaction must in any case be provided, in due time prior to the approval of the transaction itself, with complete and adequate information on the transaction, including documentation containing evidence relating to the existence of the Market or Standard Terms; and **(ii)** in the event that the transactions benefiting from the exemption referred to in this letter (f) are Transactions of Greater Significance, the Company will, in any event, **(x)** promptly involve the Committee for the purpose of assessing the applicability of this exemption, and **(y)** notify the Committee, within 10 (ten) days from the approval of the transaction, with information regarding the counterparty, the object and the consideration of the transaction, as well as the reasons why it is believed that the transaction is ordinary and/or carried out at Market or Standard Terms, providing objective supporting evidence;
- g) Transactions with or between Subsidiaries and transactions with other affiliated companies (*società collegate*), if other Related Parties of the Company do not have Significant Interests in the Subsidiaries or affiliated counterparties to the transaction. This assessment is conducted by the Chairman of the Board of Directors, with the support of the Compliance Director, or by the Board of Directors in the event that the assessment of the "significance" of the interests concerns the Chairman of the Board of Directors himself. Without prejudice to the above, the Chairman of the Board of Directors shall refer the assessment to the Committee and/or the Board of Directors if deemed appropriate, taking into account, *inter alia*, the economic value and/or any specific characteristics of the transaction ⁽²⁾.

⁽²⁾ For the purposes of assessing the significance of the interests, reference is made to the provisions of the RPT Regulation and the Implementing Communication.

The aforementioned exclusions also apply to transactions carried out through Subsidiaries referred to in Article 7 above, where applicable.

The resolutions referred to under letters (b), (c), (d), (e), (f), and (g) above remain subject to the applicable periodic disclosure obligations, including accounting-related disclosures, as provided for under the relevant regulatory framework.

4.8. Information on Transactions With Related Parties

4.8.1. Internal disclosure on Related Party Transactions

The Chairman of the Board of Directors, with the support of the competent Bodies and the Compliance Director, as well as the directors or competent corporate functions of the Subsidiaries, shall provide:

- a) the Board of Directors and the Committee with adequate information:
 - i. on a quarterly basis, on the execution of any Related Parties Transactions as well as of any transactions referred to in Article 4.7, letters (a), (f) and (g) above, approved in the quarter⁽³⁾;
 - ii. on a quarterly basis, on the implementation of any framework resolutions referred to in Article 4.6 above; and
- b) the Board of Directors and the Committee with adequate information at least every six months, on the application of the exemptions referred to in Article 9 above, at least with reference to any Transactions of Greater Significance.

The documentation supporting the transactions carried out with Related Parties shall be kept by the Compliance Director.

4.8.2 Public disclosure on Related Parties Transactions of Greater Significance

In the event of completion of Transactions of Greater Significance, including through Subsidiaries, the Company shall prepare an information document to be drawn up, as far as possible, in accordance with the scheme set out in Annex 4 of the RPT Regulation and to be published in the manner provided for by the regulations applicable to the Company.

The obligation to publish an information document also arises if several Similar or Linked Transactions are carried out during the same year, with the same Related Party or with Related Parties of both the latter and the Company, which – although not individually qualified as Transactions of Greater Significance – exceed, cumulatively considered, at least one of the Thresholds of Greater Significance⁽⁴⁾.

Should it be the case, the information document shall contain information, also on an aggregate basis, on all Similar or Linked Transactions considered for the purposes of cumulation.

The information document is published in the manner provided for by the regulations applicable to the Company **(i)** within 7 (seven) days **(x)** from the approval of the Transaction of Greater Significance by the competent Body or, if the competent Body resolves to submit a contractual proposal, **(y)** from the moment an agreement relating to the Transaction of Greater Significance is entered into or, in cases of competence of the Shareholders' Meeting, **(z)** from the approval of the Board of Directors' proposal on the Transaction

⁽³⁾ The information also relates to Related Parties Transactions carried out through the Subsidiaries that have been examined or approved by the Company's Board of Directors and for which the non-binding opinion of the Committee has been rendered.

⁽⁴⁾ For the purposes of the aforementioned cumulation, Related Parties Transactions carried out by Subsidiaries are also considered whilst any transactions that may be exempt pursuant to Article 9 of the Policy are not considered.

of Greater Significance to be submitted to the Shareholders' Meeting or **(ii)** within 15 (fifteen) days **(x)** from the time the Company executes the agreement as a result of which the Similar or Linked Transactions, executed in the same financial year, exceed, cumulatively considered, one of the Thresholds of Greater Significance or, in the event that such a contract is entered into by a Subsidiary, **(y)** from the time the Company has received notice of the approval of the transaction or the conclusion of the contract that results in the exceeding of at least one of the Thresholds of Greater Significance.

5. Applicability and Responsibility

This Policy and its amendments are approved by the Board of Directors of the Company, subject to the favorable opinion of the Committee

Change Log

Edition	Date	Author	Modification description
02	08/05/2024	Legal & Compliance Dpt	
03	05/05/2026	Legal & Compliance Dpt	