PROCEDURE FOR MANAGING THE RELEVANT INFORMATION LIST AND THE INSIDER LIST

Sanlorenzo S.p.A.

Updated as of 3 September 2026

LEGAL NOTICE

This document is an informal translation of the original Italian document. In case of inconsistency between this document and the original document in Italian, the latter will prevail.

CONTENTS

1. Introduction

1.1 The legislation and regulations on the obligations of "*issuers and any person acting on their behalf or on their account*" to draw up, manage and update an insider list are contained in Article 18 of Regulation (EU) no. 596/2014 of the European Parliament and of the Council dated 16 April 2014, on market abuse, as subsequently supplemented and amended (Market Abuse Regulation, "**MAR Regulation**").

1.2 Section 3 of the Guidelines No. 1/2017 issued by Consob on 13 October 2017 for the management of inside information (the "**Guidelines**") states that relevant information means information that the Company considers to be relevant insofar as it relates to data, events, projects or circumstances that, on an ongoing, repetitive, periodic, or sporadic, occasional or unforeseen basis, directly concern the Company and which may, at a later, even imminent, time, assume a privileged nature (the "**Relevant Information**").

Article 7 of the MAR Regulation establishes that inside information means "*information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments*" (the "**Inside Information**").

In that sense, the second paragraph of Article 7 of the MAR Regulation establishes that "*information shall be deemed to be of a precise nature if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument, the related spot commodity contracts, or the auctioned products based on the emission allowances. In this respect in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information*".

1.3 The obligations to draw up, manage and update the Insider List and the RIL, as defined below, are aimed at incentivising operators to pay greater attention to the value of Inside Information and Relevant Information and, therefore, to stimulate the establishment of adequate internal procedures to monitor the circulation of the same before its public dissemination. In particular, the Procedure regulates the institution, management and updating by Sanlorenzo S.p.A. (fiscal code 00142240464, having its registered office in Ameglia (SP), Via Armezzone 3, the "**Company**") of the list of persons who have access to Relevant Information as well as the list of persons who have access to Inside Information. The rules indicated in Article 18 of the MAR Regulation, the respective implementing rules contained in Implementing Regulation (EU) of the Commission of 12 June 2026 no. 1291 (the "**Regulation 1291/2026**"), as well as the Guidelines are also aimed at facilitating the competent authority in the conduct of insider trading investigations.

1.4 This procedure (the "**Procedure**"), which has been in force since 27 November 2019, was last updated by a resolution of the Company's Board of Directors on 3 September 2026; said update shall come into force from the same date.

1.5 Any further subsequent amendments and/or supplements to the Procedure will enter into force on the day of publication on the Company's website, or on the day otherwise envisaged by the law or the regulation or by resolution of the Board of Directors, or, in urgent cases, by the Chairperson of the Board of Directors or by the managing director.

1.6 The introduction and annexes to the Procedure form an integral and substantial part of the same.

2. Definitions

2.1 The terms used in the Procedure with initial upper-case letter will have the meaning indicated in the respective definition.

2.2 The terms defined in the singular will have the corresponding meaning in the plural and vice versa.

3. Obligations and Establishment of the Relevant Information List and Insider List

3.1 **The Relevant Information List**

In compliance with the recommendations set out in the Guidelines, the Company must draw up a list of persons having access to Relevant Information (the "**RIL**") and update it promptly.

The RIL shall be set up by the Company in an electronic medium, taking care to ensure at all times the confidentiality and accuracy of the information contained therein, as well as access to and retrieval of previous versions.

The RIL shall be divided into separate sections, one for each piece of Relevant Information. A new section of the RIL shall be added whenever a new piece of Relevant Information is identified and shall contain only the details of the persons having access to such Relevant Information. If a specific piece of previously identified Relevant Information loses its relevance, the Chairperson of the Board of Directors shall immediately inform the Person in Charge, as defined below, so that the latter may proceed to (a) close the appropriate section of the RIL relating to the specific piece of Relevant Information; and (b) remove from the aforementioned section the persons registered.

The persons to be included in the RIL because they are in possession of Relevant Information (the "**Persons Registered in the RIL**"), including persons belonging to the Organisational Functions Responsible for Inside Information (as defined in the Procedure for the Internal Management of Relevant Information and Inside Information and Disclosure to the Public of Inside Information), or the persons to be removed from the RIL, are identified by the Chairperson of the Board of Directors and then communicated to the Person in Charge. The Person in Charge shall promptly enter or remove them from the RIL according to ordinary diligence.

The persons entered in the RIL shall identify and communicate to the Person in Charge, to the best of their knowledge, the details of the persons who:

a) may have access to Relevant Information because they are part of their own structure and/or corporate function within the Company or the group to which it belongs;

b) have a collaboration relationship with the Company and may have access to Relevant Information or, on the contrary, have ceased to have access to Relevant Information.

The Person in Charge, having ascertained in agreement with the Chairperson of the Board of Directors that such persons must actually be registered in the RIL, shall promptly update the RIL according to ordinary diligence.

3.2 **The Insider List**

The Company is obliged, in accordance with Article 18, paragraph 1 of the MAR Regulation, to:

a) draw up a list of all persons who have access to Inside Information and who are working for it under a contract of employment, or otherwise performing tasks through which they have access to inside information, such as advisers, accountants or credit rating agencies (the "**Insider List**");

b) update promptly the Insider List; and

c) provide the Insider List to the competent authority as soon as possible upon its request.

The Insider List shall be split into separate sections, one for each piece of Inside Information (the "**Single Section**").

A new Single Section is added to the Insider List every time a new piece of Inside Information is identified.

Each Single Section indicates only the details of persons having access to Inside Information covered in that section. If a specific piece of Relevant Information is subsequently classified as Inside Information, the Person in Charge closes the specific section of the RIL relating to the specific piece of Relevant Information and removes the persons registered from that section, at the same time opening the section, in the Insider List, related to the specific piece of Inside Information and registering the persons with knowledge of it.

Once Inside Information has been published, the Chairperson of the Board of Directors immediately informs the Person in Charge so that the latter can close the specific Single Section of the Insider List relating to the specific Inside Information and remove the persons registered from that Single Section.

The Company may add to the Insider List a supplementary section (the "**Permanent Section**") which contains the details of persons who have access at all time to all Inside Information based upon the function they perform or the position they hold (the persons listed in the Single Sections, jointly with the persons having permanent access to Inside Information, the "**Persons Registered in the Insider List**").

If the Permanent Section is established, the Company must list the persons with particular roles as indicated below, together with the respective secretarial staff:

a) members of the Company's management and control bodies;

b) persons who carry out management functions and managers who have regular access to Inside Information or have the power to adopt management decisions that may affect the development and future prospects of the Company.

Any respective personnel in charge of carrying our duties that involve knowledge of Inside Information must be added to the persons indicated above.

The Board of Directors or, in urgent cases, the Chairperson of the Board of Directors may communicate to the Person in Charge, as defined in more detail in Article 4, any names to be listed in or to be removed from the Permanent Section.

The details of persons having permanent access to Inside Information listed in the Permanent Section are not included in the Single Sections of the Insider List.

The Company draws up and keeps updated the Insider List in electronic format, in compliance with **Annex 1**, in order to guarantee at all times that:

a) access to the Insider Register is restricted to clearly identified persons who require such access by virtue of the function they perform or the position they hold;

b) the information contained in the Insider Register is accurate and up to date;

c) previous versions of the Insider Register are accessible.

If the Insider List also contains the Permanent Section, the electronic format required shall be compliant with **Annex 2**.

The Persons Registered in the Insider List that are legal entities shall to the best of their knowledge, the details of a single natural person acting as a contact person for such third-party service provider.

The communications made in accordance with the preceding paragraph shall contain all information necessary for the exact registration and/or update of the Insider List.

4. Person in Charge and Respective Obligations

4.1 The function of person in charge is carried out by the Chief Financial Officer the Company (the "**Person in Charge**").

4.2 The Person in Charge shall:

a) deal with keeping the RIL and the Insider List, making the registrations and related updates based upon information received from the Company or from the Persons Registered in the RIL or in the Insider List;

b) verify with the aid, depending on each case, of the Persons Registered in the RIL or of the Persons Registered in the Insider List, the correctness of the data and information included in the RIL or in the Insider List;

c) update the RIL or the Insider List promptly if there is (i) a change in relation to the reason for inclusion of a Person Listed in the RIL or of a Person Listed in the Insider List; (ii) a new person having access to Relevant Information of Inside Information, who shall therefore be added to the RIL or to the Insider List; (iii) a person who no longer has access to Relevant Information or Inside Information, who shall therefore be removed from the RIL or the Insider List. Each update of the RIL or of the Insider List shall indicate the date and time at which the change occurred that required the update;

d) retain the details of the Persons Registered in the RIL or to the Persons Registered in the Insider List for at least five years after the processing or update, it being understood that such data shall be retained for a period not exceeding five years from the date on which a person ceases to be included in the RIL or the Insider Register;

e) send to the Persons Registered in the RIL or to the Persons Registered in the Insider List a communication aimed at providing adequate information in view of the registration, update or removal from the RIL or from the Insider List, as well as on the legal and regulatory obligations deriving from the MAR Regulation, from the respective implementing rules and from the Procedure, therein including the sanctions consequent to any violation.

4.3 If the Person in Charge discovers that one or more details in the registration of persons in the RIL or in the Insider List are missing or incomplete, the Person in Charge shall contact, as appropriate, the Persons Registered in the RIL or the Persons Registered in the Insider List, who shall promptly communicate the missing information.

4.4 The Persons Registered in the RIL and the Persons Registered in the Insider List shall be personally responsible for the information communicated to the Person in Charge and guarantee that the same is true, complete and will be promptly updated in the event of changes.

5. Contents of the RIL and of the Insider List and Respective Updates

5.1 The RIL and the Insider List shall contain the following information (it being understood that, with regard to the Insider Register, the information to be provided shall be that indicated, as applicable, in Annex 1 or Annex 2):

a) the identity of the person who has had access, respectively, to Relevant Information or Inside Information and, therefore, their first name, surname, business telephone number and tax identification number or, where unavailable, date of birth. In the case of a third-party legal entity providing services, it shall be sufficient to indicate the first name and surname of the natural person acting as the contact person for the third-party service provider;

b) the function performed by such persons and the reason why they are included in the RIL or the Insider Register;

c) the date and time on which such persons gained access to, or, in the case of removal, ceased to have access to, the Relevant Information or Inside Information;

d) the date and time of the last update to the RIL or the Insider Register and/or to the Individual Section or the Permanent Section;

e) the date on which the list was drawn up.

6. Personal Data Processing

6.1 The personal data provided to the Company will be processed in respect of and compliance with the Regulation EU 679/2016 ("**GDPR**"), as amended.

6.2 The Persons Registered in the RIL and the Persons Listed in the Insider List are fully aware of the contents of the privacy policy and, more specifically:

a) the purposes and methods of processing of the data;

b) the mandatory nature of provision of the data;

c) the entities or categories of entities to which the data may be communicated and the scope of dissemination of the same;

d) the rights granted to the same by Article 15 of the GDPR;

e) the name, surname, company name, domicile or residence of the controller or processor.

7. Communications

7.1 Any communication in accordance with the Procedure must be made in writing.

7.2 All communications addressed to the Company or to the Person in Charge, must be sent for the attention of the Person in Charge in one of the following ways:

- by certified email to the address: corporate.affairs@cert.sanlorenzoyacht.com; or
- by registered letter with notice of receipt to the address: via Armezzone 3, Ameglia (SP),

and in any case with communication in advance by email to the address corporate.affairs@sanlorenzoyacht.com.

7.3 Communications sent to the Persons Registered in the RIL and to the Persons Registered in the Insider List shall be sent by registered letter with notice of receipt, or by certified email.

7.4 The Person in Charge shall communicate the registration, update and removal from the RIL or the Insider List to the interested party within three working days after the occurrence of the event.

8. Amendments and Supplements

8.1 The Company's Board of Directors may make to the Procedure the amendments, updates or supplements that become necessary or opportune also in view of applicable legal and regulatory provisions, the guidelines of the supervisory authority, as well as application experience and market practices gained in that regard.

8.2 The amendments, additions or corrections will enter into force in accordance with the provisions of Article 1.5 above.

Annex 1 – Template 1 of Annex 1 of the Regulation 1291/2026

Insider list

Description of the specific piece of inside information to which this section relates to:

Date and time of creation of this section (i.e. when the specific piece of inside information was identified): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date and time of the last update of this section: [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provider)	**Surname(s)** of the insider (in the case of third-party service providers, the surname(s) of the natural person acting as a contact person for that third-party service provider)	**Professional telephone number(s)** (work direct telephone line and work mobile numbers)	**Function and reason for being insider**	**Obtained** (the date and time when the insider obtained access to the specific piece of inside information)	**Ceased** (the date and time when the insider ceased to have access to the specific piece of inside information)	**National Identification Number** (if applicable) or otherwise **Date of Birth**
[Text]	[Text]	[Numbers (no space)]	[Text describing role, function and reason for being on this list, including the company name and address in the case of third-party service providers]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[Number and/or text or yyyy-mm-dd for the date of birth]

Annex 2 – Template 2 of Annex 1 of the Regulation 1291/2026

Permanent insiders' section of the insider list

Date and time of creation of the permanent insiders' section: [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date and time of the last update of the permanent insiders' section: [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]

Date of transmission to the competent authority: [yyyy-mm-dd]

First name(s) of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provider)	**Surname(s)** of the insider (in the case of third-party service providers, the surname(s) of the natural person acting as a contact person for that third-party service provider)	**Professional telephone number(s)** (work direct telephone line and work mobile numbers)	**Function and reason for being insider**	**Obtained** (the date and time when the insider obtained access to all inside information at all time)	**Ceased** (the date and time when the insider ceased to have access to all inside information at all time)	**National Identification Number** (if applicable) or otherwise **Date of Birth**
[Text]	[Text]	[Numbers (no space)]	[Text describing role, function and reason for being on this list, including the company name and address in the case of third-party service providers]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	[Number and/or text or yyyy-mm-dd for the date of birth]