

**POLICY FOR THE MANAGMENT
OF THE RELATIONSHIP
WITH PRIMA INDUSTRIE S.P.A SHAREHOLDERS
AND THE OTHER STAKEHOLDERS**

Approved by the Board of Directors of July 29, 2021



1. Policy purpose

1.1. Prima Industrie adopts this policy ("**Policy**") to manage the relationship with shareholders and the other stakeholders in an effective way.

1.2. The information provided by the Company to the shareholders and the other stakeholders in the context of their relationship is aimed at ensuring the sustainable success of the Company and is proportional and suitable with respect to the interests of the Company and of the shareholders and the other stakeholders.

2. The Board of Directors

2.1. The Board of Directors identifies one or more executive directors ("**Directors in charge**") in charge of organizing and managing the relationship with the shareholders and the other stakeholders, with the support of the corporate Investor Relations function.

2.2. The Board of Directors is kept informed by the Directors in charge of the developments and contents of the relationship intervened with the shareholders and the other stakeholders.

2.3. The Board of Directors follows up the progress of the relationship with the shareholders and the other stakeholders, its consistency with this Policy and the compliance with the applicable rules and regulations.

3. Directors in charge by the Chairman

3.1. The Directors in charge, coordinating with the Chairman of the Board and with the support of the corporate Investor Relations function:

(i) identify the times and modalities of meetings with the shareholders and the other stakeholders, also making use, if necessary, of external consultants and specialized financial intermediaries;

(ii) evaluate whether to implement the requests for a personalized relationship by individual shareholders and other stakeholders, for the best interest of the Company and the shareholders and the other stakeholders, considering, among the other elements of evaluation, the purposes for which the relationship has to be held, the professional or non-professional nature of the investor, the features and size of the investment and the possible contributions which may arise from the relationship itself;



(iii) evaluate the requests for information coming from shareholders and investors and the modalities of a possible reply in the light of the Company interest and of the applicable law;

(iv) identify, within the Company organization, the people and functions to be involved from time to time to follow up the relationship with the shareholders and the other stakeholders.

3.2 The Chairman ensures that the Board of Directors is informed, within the first useful meeting, on the development and significant contents of the relationship with the shareholders and the other stakeholders. The Chairman may in any case take part in the relationship with the shareholders and the other stakeholders, together with the Directors in charge and with the company functions delegated from time to time.

4. Investor Relations

4.1. The Investor Relations represents the first reference for the contact by shareholders and other stakeholders and collects requests of relationship and information, informing the Directors in charge.

4.2. The Investor Relations supports the Directors in charge in all the relationship activities with the shareholders and the other stakeholders, including the definition of the information to be provided, the modalities through which articulating the relationship and the preparation of the functional reports on the information to be provided to the Board of Directors.

5. Modalities of relationship accomplishment

5.1 The Company website

5.1.1. The Company website is the main tool for disseminating information on the Company and on the Group to shareholders and investors.

5.1.2. Financial statements (Interim Management Report, Half-Year Financial Report, Annual Financial Report), non-financial information, reports and other data and information useful for making the Company well-known by the shareholders and the other stakeholders or to allow informed investment choices by the latter are available on the Company website. The Company press releases are also made available, including *price sensitive* releases, notices and other information, including the calendar of main corporate events drawn up in compliance with the instructions of Borsa Italiana S.p.A.



5.1.3. The main documents of interest of shareholders and other stakeholders connected with governance (Articles of Association, Procedure for transactions with Related Parties, Annual Report on Corporate Governance and Ownership Structure, Report on Remuneration, etc.) as well as information on the corporate governance system of the Company and on the organization of the Group are then made available on the Company website.

5.2. Shareholders' General Meeting

5.2.1. The Shareholders' General Meeting is the institutional meeting event among the Company directors and the shareholders and other stakeholders.

5.2.2. In addition to all the information required by applicable law, the Directors in Charge ensure that the questions applied by the shareholders and the other stakeholders are answered either in writing or, at the latest, during the Shareholders' General Meeting.

5.2.3. As part of the Shareholders' General Meeting, the Chairman ensures that a complete information is given on each item in agenda and ensures the effectiveness of the meeting discussion among directors, shareholders and other stakeholders.

5.3. Further steps of information and relationship among the Company, shareholders and other stakeholders

5.3.1. In addition to the information that the Company have to disclose in accordance with the law and to the steps of discussion required by law, the Company may carry out one or more of the following activities in order to encourage informed action of shareholders and other stakeholders:

- (a) presentations about the economic and financial results for the period or other significant events for the Group;
- (b) meetings with one or more shareholders and/or other stakeholders;
- (c) disclosure on the Company website of videos or meetings registrations and presentations made to the benefit of shareholders and/or other stakeholders;
- (d) dialogue with analysts and financial intermediaries who disseminate information about the Company and its Group to shareholders and other stakeholders.



6. Position of Non-Executive and Independent directors

6.1. In case a director other than the Directors in charge receive a request for meetings or information from shareholders and other stakeholders, he/she is required to promptly inform the Directors in charge, who will carry out the assessments and activities envisaged by this Policy.

6.2. The Board of Directors or, if necessary, the Directors in charge, based on the matters under discussion or for other reasons, may suggest the participation of other directors in the meetings with shareholders and other stakeholders.

7. Information

7.1. The information is provided to shareholders and other stakeholders in compliance with legal obligations, with particular reference to the interdictions of selective disclosure of privileged information.

7.2. The Directors in charge, with the support of Investor Relations and of the other corporate functions involved, ensure that no privileged or relevant information, nor information in any case deemed confidential (due to contractual obligations or company needs) and information whose disclosure could in any case harm the Company interest be disclosed

7.3. The Directors in charge evaluate the opportunity to disclose the information provided to shareholders and other stakeholders during the relationship with them, and this also outside the cases in which this disclosure is mandatory by law.