

This document is a courtesy translation into English of the "*Procedure for the management of relevant and inside information*" adopted by Moncler S.p.A. In case of any discrepancies between the English version and the Italian version, the Italian version shall prevail.

MONCLER

GROUP

PROCEDURE FOR THE MANAGEMENT OF RELEVANT AND INSIDE INFORMATION OF MONCLER S.P.A.

Most recently updated: 24 July 2024

DEFINITIONS

Board of Directors or Board	The board of directors of Moncler
Board of Statutory Auditors or Statutory Auditors	The board of statutory Auditors of Moncler
Buy Back Programme	Has the meaning set forth in Article 7.9 of the Procedure below
Conditions for Delay	Has the meaning set forth in Article 7.3 of the Procedure below
Consob Guidelines	The guidelines No. 1/2017 for the management of inside information adopted by Consob on October 31 st 2017
Consolidated Law on Finance or TUF	Legislative Decree No. 58 of 24 February 1998, as subsequently amended and supplemented
Corporate Affairs Department	The structure responsible for Moncler's corporate affairs
Corporate Governance Code or Code	The code of corporate governance for listed companies - in force on the date of this Procedure - approved by the Corporate Governance Committee and promoted by Borsa Italiana S.p.A., ABI, Ania, Assogestioni, Assonime and Confindustria
Delay	Has the meaning set forth in Article 7.3 of the Procedure below
FGIP	The so-called "Inside Information Management Function", identified, for the purposes of this Procedure, with the Chairman and Chief Executive Officer or, alternatively, as the case may be, the Chief Executive Officer and the Chief Corporate & Supply Officer, supported by the Corporate Affairs and IR Departments, within the scope of the powers granted under the Procedure
FOCIPs	The so called "Competent Inside Information Organizational Functions", <i>i.e.</i> the Moncler corporate structures or functions involved, in various capacities, in the elaboration of the mapping of the Types of Relevant Information and in the processing of Relevant Information and Inside Information in accordance with the provisions of the Procedure
Info-Room	A consultative and coordinating tool supporting the FGIP. The Info-Room consists of the Corporate Affairs Department, the IR Department and the FOCIPs involved, and performs the functions assigned to them by the Procedure
Inside Information	Has the meaning indicated in Article 4.1 of the Procedure
Insider Register or Register	Has the meaning set forth in Article 1.1 of the Procedure below

Issuers' Regulation or IR	The Regulation issued by Consob by resolution No. 11971 of 14 May 1999 on issuers, as subsequently amended and supplemented
IR Department	The structure responsible for Moncler's investor relations
Managers with Strategic Responsibilities	Persons who have the power and responsibility – directly or indirectly – for planning, managing and controlling the Company's activities, as defined in the Appendix to the Consob Regulation on related party transactions adopted by resolution No. 17221 of 12 March 2010, as subsequently amended and supplemented
Market Abuse Legislation	Has the meaning set forth in Article 1.1 of the Procedure below
Matrix	Has the meaning set forth in Article 3.1 of the Procedure below
Moncler or the Company	Moncler S.p.A., a company having its registered office at via Stendhal no. 47, Milan, Tax, VAT and Milan Companies Register No. 04642290961
Moncler Group or Group	Jointly, the Company and the Subsidiaries
Permanent Section	Has the meaning set forth in Article 6.2 of the Procedure below
Persons subject to Confidentiality Obligations	Has the meaning set forth in Article 2.1 of the Procedure below
Procedure	Has the meaning set forth in Article 1.1 of the Procedure below
Relevance Criteria	Has the meaning set forth in Article 3.3 of the Procedure below
Relevant information	Specific information of internal or external origin that normally comes within the Types of Relevant Information and which, in the opinion of the FGIP, is actually relevant in that it has all the characteristics to reasonably become Inside Information at a later, even imminent, time, but which still lacks one or more of the relevant requirements
RIL	Has the meaning set forth in Article 1.1 of the Procedure below
Shares	The shares of the Company, admitted to listing on the Euronext Milan, organised and managed by Borsa Italiana S.p.A.
Specific Section	Has the meaning set forth in Article 6.2 of the Procedure below
Subsidiaries	Companies over which Moncler exercises, directly or indirectly, control pursuant to Article 93 of the Consolidated Law on Finance

<p>Types of Relevant Information</p>	<p>The types of information that Moncler considers to be relevant, insofar as it concerns data, events, projects or circumstances that, in a continuous, repetitive, periodic, or occasional or unforeseen manner, directly concerns Moncler (and/or other Group companies, insofar as the information is directly relevant for Moncler) and that, on the basis of its characteristics, of experience, and of other circumstances, may theoretically, at a later time, become of the nature of Relevant Information or Inside Information. A list of the Types of Relevant Information is identified and constantly updated by the Company and is contained in the Matrix</p>
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1. INTRODUCTION

- 1.1 This procedure (the "**Procedure**") is adopted by the Board of Directors of Moncler in accordance with applicable Community¹ and national² legislation on the prevention and suppression of market abuse and communication with the public (the "**Market Abuse Legislation**"), and in compliance with recommendation 1, letter f) of the Corporate Governance Code, in order to regulate the management and processing of corporate information and the procedures to be followed for the external communication of documents and information concerning Moncler, with particular reference to Relevant Information and Inside Information (as defined in Article 4.1 below). The Procedure also regulates the establishment, management and updating by the Company of the register of persons who have access to Relevant Information (the "**RIL**"), as well as the register of persons who have access to Privileged Information (the "**Insider Register**" or "**Register**").

For the purposes of the implementation of the Procedure, the Company takes into account the interpretative and applicable instructions contained in the Consob Guidelines. This Procedure shall also be applied and interpreted in compliance with the guidelines of the ESMA - European Securities and Markets Authority (including the Questions and Answers on the Market Abuse Regulation, prepared and updated by ESMA itself, in the latest version made available on its institutional website) and of Consob, to the extent of their respective competences.

2. PERSONS SUBJECT TO CONFIDENTIALITY OBLIGATIONS

- 2.1 The Procedure applies to all those who, as a result of their work, professional activity, or the functions they perform, have access to Relevant Information and Inside Information. Accordingly, members of the management and audit bodies, Managers with Strategic Responsibilities, employees of the Company and of its Subsidiaries, and persons who work and/or provide professional services to or on behalf of the Company and its Subsidiaries on the basis of relationships other than employment relationships, such as, for example consultancy and collaboration relationships ("**Persons subject to Confidentiality Obligations**") are obliged to comply with the Procedure.
- 2.2 This Procedure is made available on the Company's website at www.monclergroup.com, Section "*Governance / Documents and Procedures*"; Persons subject to Confidentiality Obligations are required to read the Procedure and be aware of their responsibilities arising in consequence of the Procedure, as well as to scrupulously comply with the provisions set out therein.
- 2.3 This Procedure is also valid as an instruction given to the Subsidiaries pursuant to Article 114, paragraph 2, of the Italian Consolidated Law on Finance, in order to

¹ See (i) Directive 2014/57/EU of the European Parliament and Council of 16 April 2014 in regard to the criminal penalties applicable to market abuse (the "**Market Abuse Directive**"); (ii) Regulation (EU) no. 596/2014 of the European Parliament and Council of 16 April 2014 on market abuses, abrogating Directive 2003/6/EC or Directives 2003/124/EC, 2003/125/EC and 2004/72/EC (the "**Market Abuse Regulation**" or "**MAR**"); (iii) the implementing Regulation (EU) 2022/1210 of the Commission of 13 July 2022 laying down implementing technical standards for the application of Regulation (EU) No. 596/2014 of the European Parliament and of the Council as regards the format of lists of insiders and their updating (the "Regulation 2022/1210"); (iv) the implementing Regulation (EU) 2016/1055 of the Commission of 29 June 2016 that establishes technical standards with regard to the technical means for appropriate public disclosure of Inside Information and to delay the public disclosure of the Inside Information pursuant to the MAR (the "Regulation 1055/2016"); and (v) the other implementing regulations periodically issued by the competent authorities.

² See the TUF and the implementing legislation contained in the Issuer's Regulations. See also (i) Consob Communication No. 0061330 of 1 July 2016 concerning the recommendations on disclosure to Consob of the information required by MAR, and (ii) the Consob Guidelines.

ensure that they promptly provide the Company with all information necessary for the prompt and correct fulfilment of the public disclosure obligations imposed on the Company by the Market Abuse Regulation and the other statutory and regulatory provisions in force at any time.

The Subsidiaries are required to adopt, to the extent of their competence, the principles and content of the Procedure, adapting them to their own organisation, and ensuring that they are adequately disseminated within their corporate structures and the individual companies they control.

3. MANAGEMENT OF RELEVANT INFORMATION

Mapping of the Types of Relevant Information

3.1 In order to fulfil its obligation to disclose Inside Information in a timely manner, the Company monitors the phases prior to its publication by examining the Types of Relevant Information and Relevant Information. In particular, the FGIP, also taking into account the specific nature of the Group's business, ensures that the Types of Relevant Information are identified and monitored. To this end, the Corporate Affairs Department, with the support of the other FOCIPs:

- a) prepares a list of the Types of Relevant Information in the context of which or in relation to which it is most reasonable to expect that specific Relevant Information and/or Inside Information will arise. This list is produced by means of a risk assessment that takes into account the various internal and external actors who normally, through ordinary business processes, have access to the information in the period prior to its public disclosure, within a matrix that associates the corresponding organisational functions with these Types of Relevant Information (the "**Matrix**") enclosed under Annex I;
- b) assesses, as part of a periodic assessment, the need/advisability of making changes and/or additions to the Matrix, taking into account, *inter alia*, (i) with reference to the Types of Relevant Information, any regulatory interventions or interpretative and application practices that may become widespread on the subject, as well as the type of information usually considered by Moncler to be 'Inside Information' and (ii) with reference to the FOCIPs, any changes in the organisational structure that suggest that it may be advisable to change and/or supplement the list of identified FOCIPs.

Identification and management of Relevant Information

3.2 Each FOCIP monitors the evolution of information attributable to Types of Relevant Information within its own competence and, if information can be classed as Relevant Information, taking into account, *inter alia*, the Matrix and the indications contained in the Market Abuse Legislation, it shall promptly inform the FGIP in order for the latter to perform the assessments referred to in Article 3.4 below, indicating the reasons why it considers the information to be Relevant Information. In cases where information or an event that may constitute Relevant Information is generated in the area of activity of a corporate structure of the Company, the person in possession of the information must in all cases inform the FOCIP in the scope of which the information or event was generated. FGIP, through the Corporate Affairs Department, is required to keep records of all reports from FOCIP and may request any further information deemed necessary

3.3 In order to facilitate the identification of Relevant Information:

(i) The Types of Relevant Information have been grouped into clusters of information and thus subdivided according to the relevant sector of relevance;

(ii) a number of "relevance" criteria (the "**Relevance Criteria**") have been identified as indicators for the purpose of assessing the material nature of the specific information, all as better illustrated in the scheme in Annex *sub* 2 to this Procedure.

3.4 The FGIP, with the support of the Info Room – possibly following the notification indicated in previous Article 3.2 above - promptly makes its own assessment of the relevance of the information by filling in the specific form that the Company has provided, which is attached as Annex 3 to this Procedure, also taking account the Relevance Criteria and, if applicable, the grounds indicated by the FOCIP. It is understood that the FGIP may proceed autonomously (and therefore also in the absence of a specific report by FOCIP from time to time of reference) to qualify an information as Relevant Information.

3.5 It should be noted that completion of the evaluation form referred to in Article 3.4 above is required even if, as a result of the evaluation process, the information is not considered as Relevant Information.

Once ascertained as Relevant Information, FGIP shall ensure that (i) the Corporate Affairs Department establish in a timely manner a Specific Section of the RIL relating to the Relevant Information with the modalities indicated in Article Errore. L'origine riferimento non è stata trovata. and (ii) the Info Room keeps monitoring the Relevant Information and its stage of evolution.

3.6 The Corporate Affairs Department keeps records of the assessments made and decisions taken by FGIP with respect to Relevant Information within the meaning of this Article.

Relevant Information List (RIL)

3.7 The RIL is established and maintained by the Corporate Affairs Department through a special electronic platform managed by leading external service providers, complying, as far as possible and in accordance with a principle of proportionality, with the provisions of the Market Abuse Legislation and of this Procedure for keeping the Insider Register. Without prejudice to the foregoing, the RIL is divided into separate sections, one for each piece of Relevant Information. The details of persons entered in the Register are based on information provided by the persons themselves, who remain responsible for their accuracy.

The Corporate Affairs Department shall ensure that the data contained in the RIL is retained for a period of at least 5 years after the closure of the respective section of the RIL.

3.8 After an item of information has been qualified as Relevant Information, the Corporate Affairs Department, following a report by FGIP, proceeds to

a) open a new section of the RIL relating to the specific piece of Relevant Information, entering in that section the persons who have access to it, taking into account the reports received, as the case may be, from the FGIP or competent FOCIP;

b) notifies those who have access to the specific item of Relevant Information of their listing in the RIL, the confidentiality obligations arising from their

possession of Relevant Information and, more generally, the obligations arising from the Procedure;

- c) ensure proper coordination for the purposes of the possible preparation of a draft press release in accordance with Article 7.2 of the Procedure below.

On the basis of information and requests for updates from, *inter alia*, the FGIP and the competent FOCIP, the Corporate Affairs Department shall promptly (i) update the data contained in the RIL when: (a) a new person is to be registered in the RIL; (b) a person registered in the RIL no longer has access to the Relevant Information, as well as (ii) close the RIL in the cases set forth in Article 3.9(i) below or if the Relevant Information has become an Inside Information. The persons affected by the updates shall be informed by the Corporate Affairs Department.

- 3.9 The Info Room, with the assistance of the competent FOCIP, if any, monitors, on an ongoing basis, the stage of development of the Relevant Information and ensures that the same is circulated within the Company or the Subsidiaries only on a strictly confidential basis and exclusively to the representatives, employees and consultants of the Company or the Subsidiaries whose involvement is necessary.

If it is reasonable to assume that the Relevant Information is about to acquire the characteristics of Inside Information, the Info-Room promptly informs the FGIP to enable the latter to assess and decide whether the Relevant Information should be classified as Inside Information. It is understood that:

- (i) if the Relevant Information loses its relevant nature or does not become Inside Information, FGIP shall immediately inform the Corporate Affairs Department so that the latter may close the individual section of the RIL and notify the persons registered therein of such closure;

- (ii) a specific piece of information included in the list of Types of Relevant Information may be immediately qualified as Inside Information and that, in such case, the rules set forth in Article 4 of the Procedure shall apply directly.

4. INSIDE INFORMATION

- 4.1 As provided in the Market Abuse Legislation and the Procedure, "**Inside Information**" means information of a precise nature which has not been made public, directly or indirectly, concerning the Company or the Company's financial instruments or on the prices of related derivative financial instruments.

Inside Information is 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.

In this regard, in the case of a protracted process that is intended to bring about or that does bring about a specific circumstance or a specific event, that future circumstance or event, as well as intermediate steps in that process which are related to the causation or determination of the future circumstance or event, may be regarded as precise information.

An intermediate step in a protracted process is deemed to be Inside Information if, by itself, it satisfies the criteria of Inside Information as referred to in this Article in relation to Inside Information.

Information which, if it were made public, would be likely to have a significant impact on the prices of the financial instruments or the related derivative financial instruments is information that a reasonable investor would be likely to use as part of the basis of his or her investment decisions.

5. MANAGEMENT OF INSIDE INFORMATION

Inside Information

- 5.1 Without prejudice to the provisions of Article 3 of the Procedure above, the assessment of whether information constitutes Inside Information is made as soon as possible by the FGIP, with the assistance of the Info Room, taking into account the Relevance Criteria.
- 5.2 The FGIP, with the assistance of the Info-Room, examines:
- a) the Inside nature of the information, identifying the moment from which it becomes Inside Information. To this end, it shall fill in the specific form the Company has provided, attached as Annex 4 to this Procedure. For information that assumes its Inside nature in an unforeseeable manner, the assessment shall be carried out as soon as possible after the Inside nature of the information has been ascertained;
 - b) shall take steps to ensure that Inside Information is disclosed to the public in accordance with the provisions of Article 7.2 of the Procedure below, unless the conditions to invoke the procedure for delaying public disclosure of Inside Information pursuant to Paragraph 7.3 below are met;
 - c) inform the Corporate Affairs Department so that it may arrange for: (a) the creation of a Specific Section on Inside Information and, if it has already created an RIL, the closure of the RIL; and (b) the registration in the aforesaid Specific Section of the Insider Register of the persons who have access to the Inside Information itself, all as better specified in Article 6.2 below.
- 5.3 For the sake of clarity, it should be noted that completion of the aforementioned form is required in all cases in which FGIP takes steps to assess the nature of the information, even if, as a result of the assessment process, the information is not considered as Inside Information.
- 5.4 As specified in the Consob Guidelines:
- a) in cases where the information becomes of Inside nature at a foreseeable time, especially for information originating internally within the issuer, the issuer shall take steps in advance to reduce the technical time required for publication. In particular, the Company prepares a draft of the press release and ensures that the persons involved in the publication process are ready to perform the relevant tasks;
 - b) In cases where the information becomes of Inside nature at an unforeseeable time or, in any event, very quickly, the time frame 'as soon as possible' referred to in Article 17(1) MAR includes the time necessary for

the (rapid) assessment of whether or not a decision to delay publication should be taken, if the conditions are met.

- 5.5 The Corporate Affairs Department keeps evidence of the assessments made and decisions taken by FGIP with respect to Inside Information pursuant to this Article.

6. REGISTER OF INDIVIDUALS WHO HAVE ACCESS TO INSIDE INFORMATION

- 6.1 The Corporate Affairs Department continuously establishes, maintains and updates the Insider Register by means of a specific electronic platform managed by primary external service providers for each item of information classified as Inside Information pursuant to the Market Abuse Regulation. The Register provides indication for persons who, due to their work, professional activity, office or duties, have access to Inside Information and who, for this reason, are included in the category of Persons subject to Confidentiality Obligations pursuant to Article 2 above, who are required to comply with the Procedure.
- 6.2 The Insider Register is divided into separate sections, one for each item of Inside Information, and each section contains only the details of persons who have access to such information (each one, is referred to as a "**Specific Section**"). The Insider Register may also include an additional section (the "**Permanent Section**") in which the details of persons who always have access to all Inside Information are listed. The details of persons listed the Permanent Section should not be reported in the Specific Sections.

Each time new Inside Information is identified, a new Specific Section is added to the Insider Register. In the event of a specific piece of Inside Information being identified, the Corporate Affairs Department also promptly closes the relevant section of the RIL.

It is understood that in the case of a specific piece of Inside Information that is subsequently qualified as Inside Information, the persons entered in the Specific Section of the Insider Register will initially be entered in the RIL, if they actually have access to the Inside Information, as well as the additional persons who, in the specific case, have access to the Inside Information.

In the event that the conditions for activating the delay procedure set forth in Article 7.3, are not met, the persons who had access to the Inside Information during the period between the time the information was qualified as such and the time it was published shall be entered in the Specific Section.

The Register is compiled and updated in electronic format in accordance with Models 1 and 2 Annex I, Regulation (EU) No. 2022/1210, so that at all times it guarantees:

- a) the confidentiality of the information contained therein, ensuring that access to the list is restricted to clearly identified persons who, within the Issuer, have access to it due to the nature of their function or position;
- b) the accuracy of information entered into the Register;
- c) access to and retrieval of previous versions of the Register.

At the request of the competent authority, the Register may be transmitted by the electronic means requested by the competent authority, in a manner that guarantees that the completeness, integrity and confidentiality of the entries in the Register are not affected.

The details of persons entered in the Register are based on information provided by the persons themselves, who remain responsible for their accuracy, and are kept by the Company for a period of five years following their registration or update. This data is retained by the Company for 5 years after it is entered or updated.

- 6.3 When a person is entered in the Insider Register, the Corporate Affairs Department notifies them:
- a) of their entry in the Insider Register
 - b) of the obligations arising from having access to Inside Information; and
 - c) of the sanctions applicable for the offence of insider dealing and market manipulation or in the event of unlawful disclosure or unauthorised dissemination of Inside Information.
- 6.4 At the time of their first registration in the Insider Register, persons concerned are required to promptly inform the Company that they have acknowledged, *inter alia*, the obligations established in this Procedure and in the Market Abuse Regulation arising from inclusion in the Register and the applicable sanctions in the event of insider dealing and unlawful disclosure of Inside Information. The Insider Register must be updated promptly:
- a) if the reason for the person's inclusion in the Register changes, including cases in which the person's entry must be moved from one section of the Insider Register to another;
 - b) if a new person is to be entered in the Insider Register;
 - c) if it is necessary to note that a person entered in the Insider Register no longer has access to Inside Information, specifying the date from which their access ceased.

The deletion of entries in the Insider Register must be ordered by the Corporate Affairs Department if the reason for the entry ceases to pertain, including in cases where the Inside Information becomes public knowledge or in any case ceases to be inside Information.

Each update must indicate the date and time at which the change which necessitated the update occurred.

The Corporate Affairs Department provides notification to persons listed in the Insider Register of any updates concerning them, or if they are deleted from the Insider Register.

7. DISCLOSURE OF INSIDE INFORMATION TO THE PUBLIC

- 7.1 The Company shall as soon as possible disclose Inside Information that directly concerns the Company to the public, in fulfilment of its obligations under the Market Abuse Regulation and other legal or regulatory provisions in force from time to time.

As specified in the Consob Guidelines, information that "indirectly" concerns the Company shall therefore not be made public by Moncler, such as, for example, information that, although it affects the prices of financial instruments issued by the Company, originates from parties external to the Company. The Consob

Guidelines provide (i) certain examples of information that indirectly concerns an issuer and (ii) clarify that, following the publication of information that indirectly concerns the issuer, it is possible that Relevant Information that was not considered Inside Information by the issuer may, on the contrary, assume such nature; the examples of such types of information referred to in points (i) and (ii) above in the Consob Guidelines are reproduced in Annex 5 to this Procedure, to which reference should be made.

The Company informs the public of information concerning its Subsidiaries if the information becomes significant also for Moncler and if it constitutes Inside Information for the Company itself, also on the basis of the significance of the activities carried out by the Subsidiary considered from time to time.

If the Company, or a person acting in its name or on its behalf, communicates, in the normal exercise of their work, profession or function, Inside Information to third parties who are not bound by confidentiality obligations of a legislative, regulatory, statutory or contractual nature, the Company is obliged to make full and effective public disclosure simultaneously in the case of intentional disclosure, and promptly in the case of unintentional disclosure.

- 7.2 When disclosing Inside Information to the public, Moncler guarantees that the disclosure is made: (i) in a manner that allows rapid, free and non-discriminatory access, simultaneously throughout the European Union, as well as a complete, correct and timely evaluation of the Inside Information by the public, and, in any case; (ii) in compliance with the provisions of the Market Abuse Legislation of this Procedure.

In any case, the Company shall take all necessary measures to avoid any interference between the communication of Inside Information to the public and the marketing of its activities.

Inside Information is disclosed to the public as soon as possible by means of a press release approved in advance by the FGIP, following any necessary coordination with the Info-Room, and disseminated to the public through using the system for the dissemination of regulated information used by the Company, according to the procedures and deadlines established in this Procedure and in compliance with the Market Abuse Regulation and other statutory and regulatory provisions in force at any time (and therefore taking into account the press release formats contained in the Instructions to the Regulations of Markets Organised and Managed by Borsa Italiana S.p.A., to the extent applicable).

If the text relates to information of an accounting nature, the press release contains the attestation of the Manager in Charge of Preparation of the Company's Financial Reports pursuant to Article 154-*bis* of the Italian Consolidated Law on Finance.

Furthermore, where the consent of any counterparty to the content of the press release is required, the draft press release is shared with the counterparty and, if any amendments are requested by the counterparty following approval by the Board, represented by the Chairman and Chief Executive Officer, or by the Executive Director and the Chief Corporate & Supply Officer, the Board must approve the final version of the press release.

As specified in the Consob Guidelines:

- (a) the disclosure takes place within the timeframe necessary for the preparation of the press release in order to allow for a complete and correct

evaluation of the Inside Information by the public and for its subsequent transmission to the system for the dissemination of regulated information used by the Company³;

(b) Possible internal organisational problems, such as the absence of substitutes of the persons who should take the decision or who should take care of the dissemination, cannot justify the extension of this time frame;

(c) without prejudice to the above, in the event of a press release concerning significant events, the FGIP shall give advance notice to Consob and Borsa Italiana, including informally and sufficiently in advance of the issue of the press release to the open market to enable the said bodies to more carefully assess the impact that the information, once disseminated, could have on the regular course of trading and to adopt the appropriate supervisory measures.

The press release is considered public as soon as the relevant confirmation has been received by the system for the dissemination of regulated information used by the Company. In the event of operational malfunctions and/or interruption of the service of the aforementioned system, the information obligations towards Borsa Italiana S.p.A. are fulfilled by transmission to the e-mail address indicated in the Instructions to the Regulations of the Markets organised and managed by Borsa Italiana S.p.A.⁴

The Corporate Affairs Department shall take steps to ensure that the press release is uploaded on the Company's website by the dedicated functions, guaranteeing (i) that non-discriminatory and free access is ensured; (ii) that Inside Information is published in a section of the website in an easily identifiable manner; (iii) the date and time of publication of the Inside Information and the chronological order of the Inside Information as specified in Article 12.2 below.

Delay in the disclosure of Inside Information to the public

7.3 The Company may, under its own responsibility, delay the public disclosure of Inside Information (the "**Delay**") in accordance with the provisions of the Market Abuse Legislation and the subsequent Articles of the Procedure, provided that all the following conditions (the "**Conditions for Delay**") are met:

- a) immediate disclosure is likely to prejudice the legitimate interests of the Company;
- b) a Delay in disclosure is not likely to mislead the public;
- c) the Company is able to ensure the confidentiality of such Inside Information.

In the event of a prolonged process that proceeds in stages and that is intended to bring about, or that results in, a particular circumstance or a particular event, the Company may, under its own responsibility, delay the public disclosure of

³ If the information becomes inside information on the Friday after the markets close, the issuer does not take into account the fact that the markets will be closed over the weekend for the purposes of correct publication timing. This also takes into account the possibility of OTC transactions being concluded (see Section 7.1.6 of the Consob Guidelines).

⁴ The Instructions to the Rules of the Markets organised and managed by Borsa Italiana S.p.A. provide that, in such cases, the press release should be sent to the e-mail address: info.lcs@borsaitaliana.it.

Inside Information on this process, subject to the conditions set out in points a), b) and c) above.

- 7.4 Any Delay shall be (i) decided in advance and authorized in writing by the FGIP, following ascertainment and coordination with Info-Room of the Conditions for Delay and (ii) including for the purposes of written notification and explanation of the Delay to the CONSOB, where requested by the Authority itself, implemented by the Corporate Affairs Department using technical means, in accordance with the procedures established by the Market Abuse Regulation, that ensure accessibility, legibility and preservation on a durable medium of the following information:
- a) date and time: i) of the first existence of Inside Information at the Company; ii) of the decision to delay the disclosure of the Inside Information; iii) of the probable disclosure of Inside Information by the Company;
 - b) The identity of the persons within the Company responsible for: (i) taking the decision to delay disclosure and the decision establishing the start of the period of Delay and its probable end; (ii) the ongoing monitoring of the Conditions for Delay; (iii) the decision to disclose Inside Information to the public; (iv) providing CONSOB with the information required on the delay and its written explanation;
 - c) evidence of the initial fulfilment of the Conditions for Delay and of any change of this fulfilment during the period of Delay, including: (i) protective information barriers erected both internally and externally to prevent access to the Inside Information by persons other than those who, within the Company, are required to access it in the normal exercise of their professional activity or function; (ii) the arrangements put in place to disclose the Inside Information as soon as possible from the moment its confidentiality is no longer ensured.
- 7.5 The Corporate Affairs Department, with the assistance of the Info Room and the competent FOCIPs:
- (i) constantly monitors the persistence of the Conditions for Delay and ensures that a draft press release is produced on the Inside Information whose disclosure has been delayed, in order to ensure the prompt publication of the information in the event that, during the period of Delay, the Conditions for Delay cease to exist.
 - (ii) monitors compliance with the confidentiality conditions of the Inside Information whose disclosure to the public has been delayed, through the adoption of effective measures that permit (a) the segregation of Inside Information; (b) prevent access to the information by persons other than those who require it to perform their duties; (c) ensure that persons who have access to the information acknowledge their resulting legal and regulatory obligations and are aware of the possible sanctions in the event of abuse or unauthorised disclosure of the information.
- 7.6 If the disclosure of Inside Information has been subject to Delayed and even only one of the Conditions for Delay is no longer met, the Company must disclose the Inside Information to the public as soon as possible and shall make the notification referred to in Article 7.7 below.

- 7.7 Where the Company has delayed the disclosure of Inside Information, immediately after the Inside Information is disclosed to the public the Company must notify the CONSOB of the Delay and, in the event of a subsequent request by the CONSOB, must provide CONSOB with a written explanation of the methods by which the Conditions for Delay pursuant to Article 7.4 of the Procedure. The notification to CONSOB is not required if, following the decision to delay the disclosure, the information is not disclosed to the public because it is no longer insider information in nature. In this case, FGIP shall immediately inform the Corporate Affairs Department so that the latter may: (a) close the Specific Section of the Insider Register relating to Inside Information; and (b) remove the persons entered from the Specific Section.
- 7.8 If the Company has a Buy Back Programme underway pursuant to Article 5 MAR (the "Buy Back Programme"), as a result of the decision to delay publication of Inside Information, the Corporate Affairs Department, which is responsible for the purchase of treasury shares, acknowledges that the conditions for being able to operate with the benefit of the exemption provided for by the MAR have ceased to exist (see Article 4, paragraph 1, letter c) of Delegated Regulation (EU) 2016/1052)⁵ until the closure of the procedure for the Delay, unless the conditions for continuing the Buy-Back Programme pursuant to Article 4(2) of the above-mentioned Delegated Regulation are met.
- 7.9 Before the press release is published, no statement or separate press release may be released or disclosed by corporate officers of Moncler or its Subsidiaries concerning any Inside Information.

The Company ensures the completeness, integrity and confidentiality by remedying any failure or disruption in the communication of the Inside Information without delay.

8. PARTICULAR CASES OF PUBLIC DISCLOSURE

- 8.1 In the event of rumors that could constitute unequivocal signs of non-compliance with confidentiality obligations, FGIP will ensure that a press release is urgently produced and published (in order to clarify the situation to the market and to supplement information that is already in the public domain) where:
- a) the disclosure of Inside Information was subject to Delay and the secrecy of that information is no longer assured, including situations in which a rumor explicitly refers to that Inside Information and that rumor is sufficiently accurate to indicate that the secrecy of that information is no longer assured; and/or
 - b) CONSOB or another supervisory authority requested the disclosure of the information or its disclosure to the public.
- 8.2 The disclosure of Inside Information at a Shareholders' Meeting of the Company determines the obligation to disclose such information to the public in the manner set forth in Article 7.2.
- 8.3 In the event that the Company or another Group company organises or participates in conference calls/meetings whose audience consists of financial analysts, institutional investors or other market operators, the IR Department shall

⁵ This is without prejudice to the possibility for the Company to continue the Buy Back Programme by adopting the measures indicated in Article 4(2) and (4) of Delegated Regulation (EU) 2016/1052.

- (a) notify Consob and Borsa Italiana in advance of the date, place and main topics of the meeting;
- (b) transmit to Consob and Borsa Italiana, through the regulated information dissemination system used by the Company or according to the alternative methods established by the competent Authority, the documentation made available to the participants in the meeting, at the latest at the same time as the meetings are held;
- (c) open participation in the meeting also to members of the business press, or, where this is not possible, publish, in the manner provided for in Article 7.2, a press release outlining the main topics discussed.

In the event that the Company organises conference calls/meetings with financial analysts prior to the publication of the accounting data for the period (so-called "pre-close calls"), in order to reduce the risk of unlawful disclosure of Inside Information, the IR Department, in line with the recommendations of ESMA in its statement of 29 May 2024, takes all necessary and/or appropriate measures to verify in advance that the information that will be shared with financial analysts during the pre-close call does not involve the disclosure of Inside Information.

It is understood that during the aforesaid meetings, the Company shall not disclose Inside Information to the participants unless the same is disclosed to the public in the manner set forth in Article 7.2, simultaneously in the case of intentional disclosure and promptly in the case of non-intentional disclosure.

- 8.4 In the event that the Company participates in conference calls/meetings with representatives of trade union organisations in the course of which data relating to the Company's prospects are examined, if the delegations of the organisations have not assumed any confidentiality obligation, the Company shall disclose to the public any Inside Information disclosed therein.
- 8.5 The Info-Room supports the FGIP in assessing the case and when the decision has been taken, activates the public communication process when necessary.

9. PROCESSING OF CONFIDENTIAL INFORMATION, RELEVANT INFORMATION AND INSIDE INFORMATION

- 9.1 Each Person subject to Confidentiality Obligations is obliged to:
 - a) maintain the secrecy of Inside Information, Relevant Information and other confidential information and therefore not disclose it to anyone except in the cases provided for in the Market Abuse Regulation and other statutory and regulatory provisions in force from time to time. Each Person subject to Confidentiality Obligations is personally responsible for the safekeeping of the documentation inherent to the Relevant Information and/or Inside Information delivered to him/her;
 - b) use Inside Information, Relevant Information and other confidential information only when performing their own work, their own profession, function or duties in accordance with this Procedure, the Market Abuse Regulation and other statutory and regulatory provisions in force from time to time and, therefore, not to use it for any reason or cause for purposes other than those for which they obtained it, in particular for personal purposes, to perform unlawful acts, acts to the detriment of the Company, its Subsidiaries and, more generally, the Moncler Group;

- c) process Inside Information, Relevant Information and other confidential information only through authorised channels, adopting all necessary precautions to ensure that the relevant information is circulated in full compliance with and without breach of the Market Abuse Regulation and other legal and regulatory provisions in force from time to time, and without prejudice to the confidential nature of the information;
- d) comply with the requirements imposed by this Procedure, the Market Abuse Regulation and the other statutory and regulatory provisions in force from time to time for external disclosure of documents, Relevant Information, Inside Information and other confidential information;
- e) to comply with the prohibitions on insider trading, unlawful disclosure of inside information and market manipulation laid down in the Market Abuse Legislation and to act in full and punctual compliance with that regulation.

9.2 Access to Inside Information, Relevant Information and confidential information by persons external to the Company, its Subsidiaries and more generally the "Group" (e.g. legal, tax, and accounting consultants and credit rating agencies) is allowed within the limits imposed by the Market Abuse Regulation and other statutory and regulatory provisions in force from time to time, only after signing a confidentiality agreement compliant with the template approved by the Corporate Affairs Department.

10. PRIVACY MEASURES FOR CONFIDENTIAL INFORMATION, RELEVANT INFORMATION AND INSIDE INFORMATION

The Company adopts appropriate measures to maintain the utmost secrecy, privacy and integrity of confidential information, Relevant Information and Inside Information prior to its disclosure in compliance with the provisions set forth in the Procedure and the Market Abuse Legislation.

11. EXTERNAL COMMUNICATION OF DOCUMENTS AND INFORMATION

11.1 All dealings with the media (such as the press and other media), and with financial analysts, investors and stakeholders by executives and employees of the Company and its Subsidiaries for the purposes of disclosing documents and information of a corporate nature, must be expressly authorized in advance by the FGIP, following consultation with the appointed functions, and shall be handled through the IR Department.

11.2 If the documents and information to be disclosed contain references to specific data (e.g. economic and financial data, investment data, personnel employment data etc.), such data must be validated in advance by the competent Company bodies (e.g. the Company's Financial Reporting Officer).

12. PUBLICATIONS

12.1 The contents of any Company publication (e.g. advertisements, promotional brochures, presentations, information booklets, company magazines) must be submitted to the IR Department by the corporate departments concerned for advance verification by the Department, which must coordinate, where necessary or appropriate, with the FGIP, the Corporate Affairs Department and the competent FOCIP, in order to ensure the correctness, consistency and homogeneity of the data and information contained in such publications with

data already disclosed to the public, and to verify that such information does not contain Relevant or Inside Information and/or confidential information.

- 12.2 The Inside Information is published in chronological order, clearly indicating the date and time of disclosure, in Italian and in English, in the "Investor Relations" section of the Company's website at <https://www.monclergroup.com/it/investor-relations> and is kept for a period of five years.
- 12.3 The publication of information and the maintenance and updating of the "Investor Relations" section of the website is handled by the IR Department with the support of the company departments concerned from time to time.

13. OBLIGATIONS OF THE MEMBERS OF THE MANAGEMENT AND AUDIT BODIES AND OF MANAGERS WITH STRATEGIC RESPONSIBILITIES

- 13.1 Without prejudice to the application of the Market Abuse Legislation to all Person subject to Confidentiality Obligations, the Members of the management and audit bodies of the Company and its Subsidiaries, as well as the Managers with Strategic Responsibilities, and the heads of the Functions that are invited from time to time to meetings of the corporate bodies (including Board-committees), are also obliged to maintain the utmost confidentiality of information and documents that they come into contact with in the course of their duties, and of the contents of discussions held during meetings of the bodies and committees of which they are members, or at which they are invited to participate.
- 13.2 In order to ensure full coordination and uniformity of policy, in the interest of the Group, all dealings between members of management and audit bodies of the Company and its Subsidiaries, as well as Managers with Strategic Responsibilities and employees of the Company and the Group, with the press and other media, financial analysts and institutional investors that involve news and information (even if not confidential and not classed as Relevant Information or Inside Information) concerning the Company and/or Subsidiaries, may take place only by agreement with the FGIP and in coordination with the Info-Room, in compliance with the provisions of the Procedure, the Market Abuse Regulation and the statutory and regulatory provisions in force from time to time.
- 13.3 In all cases, members of the management and audit bodies of the Company and its Subsidiaries and Managers with Strategic Responsibilities (as well as other Person subject to Confidentiality Obligations) are absolutely forbidden to disclose confidential information or documents, Relevant Information or Inside Information to persons outside the Company or third parties in general. Such documents or information may be disclosed only by the methods and deadlines established in the Procedure, the Market Abuse Regulation, and the other statutory and regulatory provisions in force from time to time.

14. RELATIONS WITH SUBSIDIARIES

- 14.1 Without prejudice to the foregoing, confidential information concerning individual Subsidiaries that may constitute Relevant Information or Inside Information for the Company is the responsibility of the respective sole director or the executive director, as the case may be), or of the heads of Functions that by virtue of their role could have access to Relevant or Inside Information, who are required to communicate to the Info-Room, without delay, any information concerning facts occurring in their sphere of activity that - by their own reasonable assessment - may qualify as Relevant or Inside Information.

15. MARKET SURVEYS

- 15.1 The disclosure of Inside Information to one or more potential investors prior to the announcement of a transaction during a 'market sounding', in order to assess the interest of potential investors in a possible transaction and its relevant terms – such as its potential size or price – is considered to be made in the normal exercise of an occupation, profession or function when the procedures set out in Article 11 of the Market Abuse Regulation are complied with.

16. FINAL PROVISIONS

- 16.1 In the event of violation on the part of Persons subject to Confidentiality Obligations of the provisions of this Procedure, the Company shall take action against the persons responsible by invoking the measures established in their employment contract (in the case of managers or employees), together with the provisions of law and regulations applicable from time to time. In particular, with respect to employees and Managers with Strategic Responsibilities, the disciplinary sanctions provided for in applicable legislation, applicable collective bargaining agreements and/or internal regulations shall apply. With respect to external collaborators and/or consultants, the necessary initiatives shall be taken to terminate the existing relationship due to non-fulfilment. With respect to directors and auditors, the Board of Directors may propose revocation for just cause.
- 16.2 In the event that, due to a violation of corporate disclosure legislation arising from non-compliance with the principles set out in this Procedure, the sanctions provided for in statutory and regulatory provisions applicable from time to time are imposed on the Company, the Company may seek recourse against the persons responsible for such violation, in order to obtain reimbursement of all sums disbursed by the Company and/or its Subsidiaries for any reason in connection with such sanctions.
- 16.3 The Corporate Affairs Department is responsible for updating the Procedure in the light of changes in the reference legislation and experience gained in its application, formulating proposals for amendments and/or additions to the Procedure to the FGIP for submission to the Board of Directors from time to time as deemed necessary or appropriate. In the event of amendments and/or additions to the Procedure, previous Article 2.2 shall apply.
- 16.4 The personal data of Persons subject to Confidentiality Obligations will be processed pursuant to the established deadlines for the purpose of fulfilling the obligations established in the Procedure and applicable statutory and regulatory provisions. These data shall be provided by the interested parties in order to satisfy the subject matter obligations.

LIST OF ATTACHMENTS:

- Annex "1": Matrix;
- Annex "2": Relevance Criteria.
- Annex "3": Form for the formalisation of assessments concerning the classification of Relevant Information.
- Annex "4": Form for the formalisation of assessments concerning the classification of Inside Information.
- Annex "5": Illustrative and non-exhaustive list of information indirectly concerning an issuer.

**ANNEX 1
MATRIX**

ANNEX 2

CRITERIA “OF RELEVANCE” FOR THE IDENTIFICATION OF RELEVANT AND INSIDE INFORMATION

ANNEX 3

FORM FOR THE FORMALISATION OF ASSESSMENTS CONCERNING THE CLASSIFICATION OF RELEVANT INFORMATION

ANNEX 4

**FORM FOR THE FORMALISATION OF ASSESSMENTS CONCERNING THE
CLASSIFICATION OF INSIDE INFORMATION**

ANNEX 5

NON-EXHAUSTIVE LIST OF INFORMATION INDIRECTLY CONCERNING AN ISSUER

A. ILLUSTRATIVE AND NON-EXHAUSTIVE LIST OF TYPES BY INFORMATION INDIRECTLY CONCERNING THE ISSUER.

Information pertaining to:

- data and statistics disseminated by public institutions
- forthcoming publication of rating agency reports
- forthcoming publication of research by financial analysts
- investment recommendations and suggestions on the value of financial instruments
- central bank decisions on interest rates
- government decisions on taxation, sector regulation, debt management, etc.
- decisions of public authorities and local government
- decisions on changes to the rules on the definition of market indices and, in particular, their composition
- decisions on the microstructure of trading venues, e.g. changes in the market segment in which the issuer's shares are traded or changes in trading arrangements or a change in market makers or trading conditions
- decisions of supervisory or antitrust authorities.

B. NON-EXHAUSTIVE EXAMPLE OF INFORMATION RELATING INDIRECTLY TO THE ISSUER AS A RESULT OF THE PUBLICATION OF WHICH RELEVANT INFORMATION THAT WAS NOT CONSIDERED BY THE ISSUER TO BE INSIDE INFORMATION MAY BECOME SO

In the event that the government adopts a measure from which companies in the sector in which the issuer operates could benefit, subject to certain conditions, the issuer might be the only one to know whether it already complies with the conditions and the extent of the benefit.

Should the consensus of financial analysts increase the issuer's valuation on the basis of situations, facts, data or expectations that the issuer, however, knows to be unfounded, such information could become privileged.

Where the manager of a share index includes the issuer's financial instruments in the index, the issuer, considering that the information indirectly affects it, shall not issue a release unless the information has a specific impact on the issuer's financial instruments that is not already known to the market.

