

**WIIT S.P.A. INSIDE INFORMATION AND RELEVANT INFORMATION REGISTER
MAINTENANCE POLICY**

WIIT

THE PREMIUM CLOUD

1 Introduction

- 1.1 In application of the combined provisions of Article 18 of Regulation (EU) 596/2014 and Implementing Regulation (EU) 2026/1291, this policy (hereafter the "**Policy**") governs (i) the management, maintenance and updating of the **Insider Register** and (ii) the management, maintenance and updating of the register of persons with access to information which at a subsequent point, even within a short period of time, may become Inside Information (the "**RIL Register**" and, together with the Insider Register, the "**Registers**").
- 1.2 This Policy must be applied in accordance with all European and Italian laws and regulations applicable from time to time, as well as in compliance with the guidelines issued by ESMA (the European Securities and Markets Authority) and Consob, each within its purview.
- 1.3 For that not explicitly established in this Policy, reference is expressly made to the communication provisions concerning inside information and corporate information set out by the applicable legal and regulatory provisions, in addition to the *pro tempore* guidelines issued by Consob and by the other competent authorities.
- 1.4 This Policy should be read together with the "WILT S.p.A. *Inside Information Management and Communication Policy*" (the "**Inside Information Policy**").
- 1.5 The Policy was approved by the Board of Directors of the Company on March 18, 2019 and last updated on August 4, 2026.

2 Definitions

The terms and expressions in bold are defined as follows.

"**Chief Executive Officer**" indicates all Directors with operating powers.

"**Competent Authority**" indicates the competent authority as identified as per Article 22 of the MAR.

"**CFO**" indicates the Chief Financial Officer of the Company.

"**Board of Statutory Auditors**" indicates the Board of Statutory Auditors of the Company in office.

"**Board of Directors**" indicates the Company's Board of Directors as appointed.

"**Group**" indicates the Company and its subsidiaries.

"**Inside Information**" is defined as per Article 2 of the Inside Information Policy.

"**Relevant Information**" is defined as per Article 2 of the Inside Information Policy

3 Natural and legal persons enrolled in the Registers

The Insider Register and the RIL Register must contain a list of all persons who have access to inside information and material information, and with whom there is a professional working relationship - including one based on an employment contract - or who otherwise perform certain duties through which they have access to such information, such as, for example (the "**Covered Persons**"):

- (a) the members of the Board of Directors and of the Board of Statutory Auditors of the Company, in addition to the members of the administration and control boards of the legal person which exercises control, as defined by Article 2359 of the Civil Code, over the Company;
- (b) persons who hold management positions with the Company and Executives with regular access to Inside and/or Relevant Information and who have decision-making powers that may affect the development and the prospects of the Company; as well as all other persons who through the duties of office participate in the Board's meetings, with regard to all Inside and/or Relevant Information concerning the Company;
- (c) any other party granted the power to execute transactions in the name of and on behalf of the Company and/or the Group, having relevance with regards to Company operations;
- (d) consultants, accountants, or credit rating agencies;
- (e) any person with Inside and/or Relevant Information on the basis of circumstances other than those identified at points (a), (b), (c) or (d), where such persons know or ought to know that it is Inside and/or Relevant Information.

4 Register Structure

Insider Register

- 4.1 The Insider Register is divided into separate sections, each relating to individual items of Inside Information.

Once new Inside Information is identified, a new section should be added to the list ("**Occasional Registers**").

- 4.2 Each section of the list of the Occasional Registers should indicate:

- a) description of the specific Inside Information;
- b) date and time of creation of the section;
- c) date and time of the latest update of the section;
- d) communication date to the Competent Authority;
- e) full birth name of the account holder (for third-party service providers, the last name or last names of the individual serving as the contact person for the third-party service provider);
- f) professional telephone numbers (professional fixed and mobile direct line);

- g) function and reason for access to Inside Information;
- h) date and time at which the party obtained access to specific Inside Information;
- i) date and time at which the party ceased to have access to specific Inside Information;
- j) national identification number (if applicable) or date of birth.

4.3 Subject to the above, the Company may add to the list a supplementary section reporting the details of persons who, due to the function they perform or the position they hold, have constant access to all Inside Information (the "**Permanent Register**"); once included in this section, these persons should no longer be included in the other sections. The Permanent Register must include:

- a) date and time of creation of the section;
- b) date and time of the latest update of the section;
- c) communication date to the Competent Authority;
- d) full birth name of the account holder (for third-party service providers, the last name or last names of the individual serving as the contact person for the third-party service provider);
- e) professional telephone numbers (professional fixed and mobile direct line);
- f) function and reason for access to Inside Information;
- g) date and time at which the party obtained constant access to all inside information;
- h) date and time at which the party ceased to have constant access to all inside information;
- i) national identification number (if applicable) or date of birth.

RIL Register

4.4 The RIL Register comprises separate sections for each piece of Relevant Information on the basis of similar criteria to those identified for the Insider Register with regards to differing pieces of Inside Information. The Company therefore adds a new section to the RIL Register on the identification of new Relevant Information and may create a supplementary section to the RIL Register for persons who always have access to Relevant Information.

4.5 Subject to that stated above, the sections of the RIL Register need not indicate, with reference to the Covered Persons: (i) date of birth; (ii) national identification number; (iii) complete private address; (iv) private and office telephone numbers; (v) time of enrollment, or any updates.

5 Maintenance of the Registers

5.1 The Registers should be maintained electronically and consist of a system accessible via Internet/Intranet and protected by adequate security

systems and access filters and credentials.

5.2 The Registers should guarantee:

- a) the confidentiality of the information contained therein, ensuring that access to the list is limited to Covered Persons or any other parties acting in their name or on their behalf accessing such on the basis of their respective function or position within the Company;
- b) the accuracy of the information reported in the list; in addition to
- c) the access and availability of previous versions of the list.

5.3 The Registers are unique to the Group and are maintained by the CFO (the "**Manager**"). In addition to the functions identified in other parts of the Policy, the Manager oversees the criteria and means to be adopted for the maintenance and research of the information contained in the Registers, so as to ensure easy access, management, consultation, extraction and printing.

6 Updating, maintenance and sending of Registers' data

6.1 The Registers should be updated in a timely manner by the Manager, adding the date and time of the relative updating, where:

- a) there is a change in the reason for inclusion of a person already included in the Insider Register or RIL Register;
- b) a new person should be included in the Registers as having access to Inside Information and/or Relevant information (depending on the case);
- c) a person included in the Registers no longer has access to Inside Information and/or Relevant Information (depending on the case).

6.2 The lists of Covered Persons included in the Registers are maintained by the company for five years from discontinuation of the circumstances resulting in the original inclusion or updating.

6.3. The Manager sends the Registers as soon as possible to the competent Authorities upon receiving such a request.

7 Disclosure to persons included in the Registers

7.1 The Manager sends without delay to the Covered person, after enrollment in the Insider Register and/or in the RIL Register (depending on the case):

- a) communication, as per Annex A, by which the Manager informs the Covered Person of: (i) their inclusion in the Insider Register; (ii) the legal and regulatory obligations deriving from access to Inside Information; and (iii) the sanctions applicable in the case of the abuse of Inside Information and market manipulation or for the unauthorized circulation of Inside Information.
- b) communication, as per Annex B, by which the Manager informs the Covered Person of: (i) their inclusion in the RIL Register; and (ii) the

confidentiality obligations deriving from access to Relevant Information.

- 7.2 Disclosure is made in writing, by certified or ordinary e-mail, registered mail or hand-delivered communication.
- 7.3 The Manager, in addition, notifies Covered Persons already included in the Registers of any updates to their information, through written communication, sent by certified or ordinary e-mail or registered mail or by hand delivery, while communicating any cancellation from the Registers, also via certified e-mail, registered mail or by hand delivery.
- 7.4 The Manager maintains on a durable medium a copy of the communication sent to ensure the proof and traceability of fulfilment of the disclosure obligations.
- 7.5. The Manager sends to requesting Covered Persons a paper copy of the information regarding them included in the Registers.

8. Communications of persons to the Manager

Each Covered Person is required to:

- a) return, signed in recognition of receipt, a copy of this Policy, accepting therefore its content;
- b) comply with the provisions contained therein.

9. Processing of personal data

- 9.1 For the purposes of the Policy, the company will be required to process the personal data of Covered Persons. The Covered Persons are therefore informed of the processing of their personal data by the Company or by officers and/or staff designated by the Company, as per the terms of Regulation (EU) 2016/679 and subsequent amendments, having been informed of the following:
 - a) the purposes and methods of the data processing;
 - b) the mandatory nature of the provision of the data;
 - c) the persons or classes of persons to whom the data may be communicated and the scope of dissemination of the data;
 - d) the rights as per Article 15 and subsequent of Regulation (EU) 2016/679;
 - e) the name and surname, the company or business name and the domicile, residence and headquarters of the data controller and responsible officer:
 - Data controller: WIIT S.p.A.
 - Manager: Stefano Pasotto.
- 9.2 With the delivery of the acceptance letter as per Annexes A and/or B (depending on the case), consent as per and for the purposes of

Regulation (EU) 2016/679 is considered validly expressed.

10. Amendment and publication of the Policy

- 10.1 The provisions of the Policy will be updated and/or supplemented under the charge and responsibility of the Board of Directors of the Company, subject to the provisions of law and applicable regulations, and also to the applied experience and practices of the market that may mature in this area. The Company's Chief Executive Officers are authorized to make non-discretionary amendments and supplementations this Policy as necessary to comply with laws or regulations. The Chief Executive Officers are also granted the power to make formal and non-substantive amendments to this Policy.
- 10.2 The amendments and/or supplements to the provisions shall be communicated to the Covered Persons by the Manager with an indication of the date of entry into force of the new or amended provisions.
- 10.3 The Policy is published on the Company's website.

11. Entry into force of the Policy

- 11.1 This Policy, as approved by the Board of Directors on August 4, 2026, becomes effective on August 5, 2026.

ANNEX A - ACCEPTANCE LETTER

Chart 1

Notification of enrollment in the Insider Register and disclosure on the processing of the personal data of the interested parties

Milan, _____

Dear _____,

in accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of April 16, 2014 on market abuse ("**Market Abuse Regulation**" or "**MAR**") and of Implementing Regulation (EU) 2026/1291, in addition to the WIIT S.p.A. "*Inside Information and Relevant Information Register Maintenance Policy*", we inform you that today your data has been included in the Insider Register from _____ [in connection with the following inside information _____] / [as, in consideration of your role as _____ of the Company, you have constant access to Inside Information]. We hereby also remind you that parties with access to inside information concerning the Company, for its circulation, should uphold the content of the "*WIIT S.p.A. Inside Information Management and Communication Policy*" attached below, together with the above-mentioned Policy (the "**Policies**").

We remind you also that violation of the corporate disclosure provisions constitutes a criminal and administrative offense identified as insider dealing and market manipulation and may give rise to situations involving the administrative liability of the Company. In the case in which, as a result of violations of the disclosure provisions following non-compliance with the principles established in the Policies, the Company may incur monetary sanctions as per the applicable regulation. In this case, the Company shall seek to conclude a settlement with the persons responsible for these violations, in order to obtain reimbursement for charges stemming from the payment of these sanctions.

The issue of any criminal and administrative sanctions shall be the subject of written reporting to the relative manager and to the Board of Directors. In addition, non-compliance with the provisions may have consequences for employees with regards to the application of disciplinary actions.

We communicate to you that the personal data necessary for enrollment in the Insider Register and the relative updates shall be processed and maintained by WIIT S.p.A., with the support of computerized devices, in compliance with the privacy rules (i.e. the domestic privacy rules, European Regulation 2016/679 - GDPR - concerning the protection of natural persons with regards to the processing of personal data, in addition to the free circulation of this data, which repeals Directive 95/46/EC and the Oversight Authority provisions regarding the protection of personal data), in order to fulfill the obligations under the market

abuse and Inside Information processing regulations and for the period required by the above-stated regulations.

We indicate that this data processing is required to fulfill the legal obligation to which the Data Controller is subject, as per Article 6, paragraph 1, letter c) of the GDPR. The communication of the personal data requested is however obligatory; the personal data acquired, in addition to that processed, shall be communicated and circulated to other WIIT Group companies for the purposes related to the above indicated relations and, however, shall not be communicated and circulated except in accordance with the legally-permitted cases. The failure to provide such may expose you and/or WIIT S.p.A. to possible penalties in accordance with the applicable regulation and/or the Policy. You are informed in addition that the internal processing manager is Stefano Pasotto, domiciled at the registered office of Milan, via dei Mercanti No. 12. We inform you finally that the Data Controller in question is WIIT S.p.A., with registered office in Milan, via dei Mercanti No. 12.

You can exercise at any time the rights that are recognized by the applicable regulation, including: a) access to your personal data, obtaining evidence of the purposes pursued by the Owner, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes; b) the correction of inaccurate personal data without delay; c) in the cases provided for, the deletion of your data; d) the limitation or opposition to processing, whenever possible; e) the requesting of the portability of the data that you have provided to the Company, i.e. to receive it in a structured, commonly used format readable by automatic device, also to transmit this data to another owner, without any impediment to the Owner.

Furthermore, you can lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR. To exercise these rights, the Owner should be contacted at the following e-mail address: Stefano.Pasotto@wiit.cloud.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information, you may contact the company at the following e-mail address: Stefano.Pasotto@wiit.cloud.

Chart 2
Insider Register updating

Milan, _____

Dear _____,

in accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of April 16, 2014 on market abuse ("**Market Abuse Regulation**" or "**MAR**") and of Implementing Regulation (EU) 2026/1291, in addition to the WIIT S.p.A. "*Inside Information and Relevant Information Register Maintenance Policy*", we inform you that following your appointment as _____ at the Company, on _____ the reason for your enrollment in the Insider Register has been updated. We hereby also remind you that parties with access to inside information concerning the Company, for its circulation, should uphold the content of the "*WIIT S.p.A. Inside Information Management and Communication Policy*", sent to you on your initial enrollment in the Register and however available on the company website at www.wiit.cloud in the "Company" section (the "**Policy**"). We remind you also that violation of the corporate disclosure provisions constitutes a criminal and administrative offense identified as insider dealing and market manipulation and may give rise to situations involving the administrative liability of the Company. In the case in which, as a result of violations of the disclosure provisions following non-compliance with the principles established in the Policy, the Company may incur monetary sanctions as per the applicable regulation. In this case, the Company shall seek to conclude a settlement with the persons responsible for these violations, in order to obtain reimbursement for charges stemming from the payment of these sanctions.

The issue of any criminal and administrative sanctions shall be the subject of written reporting to the relative manager and to the Board of Directors. In addition, non-compliance with the provisions may have consequences for employees with regards to the application of disciplinary actions.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information,

you may contact the company at the following e-mail address:
Stefano.Pasotto@wiit.cloud.

Chart 3

Cancellation from the Insider Register

Milan, _____

Dear _____,

in accordance with the provisions of Article 18 of Regulation (EU) No. 596/2014 of April 16, 2014 on market abuse ("**Market Abuse Regulation**" or "**MAR**") and of Implementing Regulation (EU) 2026/1291, in addition to the WIIT S.p.A. "*Inside Information and Relevant Information Register Maintenance Policy*", we inform you that on _____ the reason for your enrollment in the Insider Register ceased to be valid. Your personal details subject to handling (surname, name, tax number, company, reason for inclusion on the Register) shall be removed five years from the cancellation date.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information, you may contact the company at the following e-mail address: Stefano.Pasotto@wiit.cloud.

ANNEX B - ACCEPTANCE LETTER

Chart 1

Notification of enrollment in the RIL Register and disclosure on the processing of the personal data of interested parties

Milan, _____

Dear _____,

in accordance with the provisions contained in the WIIT S.p.A. "*Inside Information and Relevant Information Register Maintenance Policy*", we inform you that your personal data was included in the RIL Register from _____ in connection with the following information: _____. We hereby also remind you that parties with access to relevant information concerning the Company, for its circulation, should uphold the content of the "*WIIT S.p.A. Inside Information Management and Communication Policy*" attached below, together with the above-mentioned Policy.

We communicate to you that the personal data necessary for enrollment in the RIL Register and the relative updates shall be processed and maintained by WIIT S.p.A., with the support of computerized devices, in compliance with the privacy rules (i.e. the domestic privacy rules, European Regulation 2016/679 - GDPR - concerning the protection of natural persons with regards to the processing of personal data, in addition to the free circulation of this data, which repeals Directive 95/46/EC and the Oversight Authority provisions regarding the protection of personal data), in order to fulfill the obligations under the market abuse and Inside Information processing regulations and for the period required by the above-stated regulations.

We indicate that this data processing is required to fulfill the legal obligation to which the Data Controller is subject, as per Article 6, paragraph 1, letter c) of the GDPR. The communication of the personal data requested is however obligatory; the personal data acquired, in addition to that processed, shall be communicated and circulated to other WIIT Group companies for the purposes related to the above indicated relations and, however, shall not be communicated and circulated except in accordance with the legally-permitted cases. The failure to provide such may expose you and/or WIIT S.p.A. to possible penalties in accordance with the applicable regulation and/or the Policy. You are informed in addition that the internal processing manager is Stefano Pasotto, domiciled at the registered office of Milan, via dei Mercanti No. 12. We inform you finally that the Data Controller in question is WIIT S.p.A., with registered office in Milan, via dei Mercanti No. 12.

You can exercise at any time the rights that are recognized by the applicable regulation, including: a) access to your personal data, obtaining evidence of the purposes pursued by the Owner, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes; b) the correction of

inaccurate personal data without delay; c) in the cases provided for, the deletion of your data; d) the limitation or opposition to processing, whenever possible; e) the requesting of the portability of the data that you have provided to the Company, i.e. to receive it in a structured, commonly used format readable by automatic device, also to transmit this data to another owner, without any impediment to the Owner.

Furthermore, you can lodge a complaint with the Data Protection Authority pursuant to Article 77 of the GDPR. To exercise these rights, the Owner should be contacted at the following e-mail address: Stefano.Pasotto@wiit.cloud.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information, you may contact the company at the following e-mail address: Stefano.Pasotto@wiit.cloud.

Chart 2
RIL Register updating

Milan, _____

Dear _____,

in accordance with the WIIT S.p.A. policy "*WIIT S.p.A. Inside Information and Relevant Information Register Maintenance Policy*", we inform you that following _____, on _____ the reason for your enrollment in the RIL Register has been updated. We hereby also remind you that parties with access to relevant information concerning the Company, for its circulation, should uphold the content of the "*WIIT S.p.A. Inside Information Management and Communication Policy* ", sent to you on your initial enrollment in the RIL Register and however available on the company website at www.wiit.cloud in the "Company" section.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information, you may contact the company at the following e-mail address: Stefano.Pasotto@wiit.cloud.

Chart 3

Cancellation from the Relevant Information Register

Milan, _____

Dear _____,

in accordance with the WIIT S.p.A. "*Inside Information and Relevant Information Register Maintenance Policy*", we inform you that on _____ the reason for your enrollment in the RIL Register ceased to be valid. Your personal details subject to handling (surname, name, tax number, company, reason for inclusion on the RIL Register) shall be removed five years from the cancellation date.

Kind regards,

For review and acceptance

Date:

Place:

You are kindly requested to send a copy of this communication, signed in acknowledgment of viewing and acceptance, to Computershare S.p.A. via e-mail to: WIIT-rap@computershare.it. For clarification or additional information, you may contact the company at the following e-mail address: Stefano.Pasotto@wiit.cloud.