WIIT S.P.A. MULTI-VOTING RIGHTS REGULATION

1. Introductions and nature of the Special List

1.1 In accordance with Article 7 of the By-Laws, each Share carries the right to two votes (at all ordinary and extraordinary shareholders' meetings whose Record Date falls on the date subsequent to the deadline indicated below), where both the following conditions have been met: (a) the voting right devolves to the same party on the basis of a Real Legitimate Right for the entire Relevant Period, without prejudice to the fact that when calculating the Relevant Period account is also taken of the period of continuous possession of the Shares from the start date of trading of the Company's shares on AIM Italia (i.e. June 5, 2017) and the date of enrollment in the Special List (the "**AIM Italia Vesting Period**"); and (b) the satisfaction of the requirement set out under (a) above is certified: (i) continuous enrollment, for a period of at least 24 months, in the Special List; or (ii) in order to consider the AIM Italia Vesting Period when calculating the Relevant Period, through continuous enrollment in the Special List, and, for the calculating of the AIM Italia Vesting Period, through a specific notice issued by the intermediary with which the shares are on deposit in accordance with applicable legislation attesting to possession of the Real Legitimate Right for the period prior to enrollment in the Special List. Furthermore, one additional vote shall be attributed upon the expiration of each 12-month period following the conclusion of the Relevant Period in which the Share belonged to the same person (or, in the case of co-ownership of the Real Legitimate Right, to the same persons) by virtue of a Real Legitimate Right, registered in the Special List, up to a total maximum of 10 votes per share. It remains understood that for entitled shareholders who, at the date that the Extraordinary Shareholders' Meeting resolution of May 16, 2024 which amended Article 7 of the By-Laws was registered with the competent Companies Registry, had already accrued double voting rights and are registered in the Special List, the further period for the accrual of additional votes will run from the date that the aforementioned Shareholders' Meeting resolution was registered.

1.2 On March 18, 2019, the Board of Directors of the Company, with efficacy from the beginning of trading on the MTA: (i) adopted the present Regulation for the governance of the registration, maintenance and updating of the Special List in compliance with the applicable regulation, and however so as to ensure the timely exchange of information between Shareholders, the Company and Intermediary, and (ii) appointed Computershare S.p.A. as the Appointee for the maintenance of the Special List. This Regulation was updated by the Board of Directors on August 4, 2026.

1.3 For all information regarding the establishment of multi-voting rights not set out in this Regulation, reference should be made to the applicable regulations and, in particular, the CFA, the Issuers' Regulation, the Joint Provision and the By-Laws.

1.4 The Special List constitutes a special section of WIIT's shareholders' register.

2. Definitions

In addition to the definitions included in other articles, the following definitions apply for the purposes of this Regulation:

"**Shares**" indicates the ordinary shares of the company.

"**Shareholders**" indicate the holders of Shares.

"**Communication**" indicates the communication made by Intermediaries to the Company declaring the right for enrollment in the Special List, as per Article 44, paragraph 2 of the Joint Provision.

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

"**Consob**" indicates the "Commissione Nazionale per le Società e la Borsa" (Italian market oversight authority), set up as per Law No. 216 of June 7, 1974, with registered office in Rome, via G.B. Martini No. 3.

"**Real Legitimate Right**" indicates full ownership with voting rights, bare ownership with voting rights or usufruct with voting rights.

"**Special List**" indicates the list to which, on their request, holders of a Real Legitimate Right are enrolled, having requested multi-voting rights, established in accordance with Article 127-*quinquies* of the CFA and Article 143-*quater* of the Issuers' Regulation.

"**Appointee**" indicates the party appointed by the Board of Directors to manage and maintain the Special List.

"**Intermediary**" indicates the party permitted to maintain the accounts in which the Shares and the relative transfers are registered, as defined by Article 2, letter m) of the Joint Provision.

"**MTA**" indicates the "Mercato Telematico Azionario", organized and managed by Borsa Italiana S.p.A. (main segment of Italian Stock Exchange).

"**Relevant Period**" indicates the continual period of at least 24 months over which the voting right devolves on the basis of a Real Legitimate Right.

"**Joint Provision**" indicates Consob's and the Bank of Italy's post-trading provision of August 13, 2018 (as subsequently amended and supplemented).

"**Record Date**" indicates the date on which the right to attend the Shareholders' Meeting and exercise the voting rights established by the applicable rules (including regulations) devolves.

"**Regulation**" indicates this regulation for multi-voting rights adopted by WIIT S.p.A.

"**Issuers' Regulation**" indicates the regulation adopted through Consob Resolution No. 11971 of May 14, 1999, concerning the governance of issuers (as subsequently amended and supplemented).

"**Requesting Party**" indicates the holders of a Real Legitimate Right who wish to receive the benefit of double votes.

"**Company**" or "**WIIT**" indicates WIIT S.p.A.

"**By-Laws**" indicates the By-Laws of the Company, with efficacy subject to the start of trading of Shares on the Italian Stock Exchange, as subsequently amended and supplemented.

"**CFA**" indicates Legislative Decree No. 58 of February 24, 1998 (Consolidated

Act on financial intermediation).

3. Special List

3.1 The Company has set up a Special List, in accordance with Article 127-*quinques*, paragraph 2 of the CFA and as per the provisions contained in Article 143-*quater* of the Issuers' Regulation.

3.2 In accordance with Article 143-*quater* of the Issuers' Regulation, the Special List contains the following information:

(i) the details of the Requesting Parties, with indication, in the case of parties other than natural persons, of whether subject to the direct or indirect control of third parties and the details of any parent company in accordance with Article 93 of the CFA;

(ii) the number of the Shares for which enrollment has been requested, with indication of the transfers and restrictions relating to such;

(iii) the enrollment date.

In a specific section of the Special List, the following are also indicated:

(i) the details of parties who have received multi-voting rights with indication, in the case of parties other than physical persons, of whether under the direct or indirect control of third parties and the details of any parent company in accordance with Article 93 of the CFA;

(ii) the number of Shares with multi-voting rights, with indication of the transfers and restrictions on such, in addition to the revocation deeds;

(iii) the date of receipt of multi-voting rights.

4. Enrollment to the Special List and receipt of multi-voting rights

4.1 Presentation of the enrollment request

The Requesting Party should present, through the Intermediary with whom the Shares are registered, an enrollment request to the Special List, specifying the number of Shares to be registered to the Special List. In the case in which the Requesting Party is other than a natural person, such should specify in the request whether they are subject to the direct or indirect control of third parties and the details of any ultimate parent company (and the relative chain of control ([1])).

([1]) For the purposes of this Regulation, the notion of control, which extends both to legal persons and natural persons, is that established by Article 93 (Definition of control) of the CFA: "*1. This part considers subsidiaries, in addition to those companies indicated at Article 2359, paragraph 1, numbers 1 and 2 of the Civil Code, and also: a) companies, Italian or overseas, for which a party has the right, on the basis of a contract or a By-Law clause, to exercise dominant influence, where applicable law permits such contracts or clauses; b) companies, Italian or overseas, over which a shareholder, on the basis of agreements with other shareholders, possesses by themselves sufficient votes to exercise dominant influence at the Ordinary Shareholders' Meeting. 2. For the purposes of paragraph 1, the rights devolving to*

Together with the request for enrollment, the Intermediary sends the Communication by Certified Email to: votomaggiorato_computershare@pec.it and wiit@pec.wiit.cloud.

The Special List enrollment request form is published on the Company website (www.wiit.cloud, "*Investors*" section).

Requests for enrollment on the Special List directly from shareholders or in a manner other than that indicated above are not accepted.

4.2 Special List enrollment

The Company, having received the Special List enrollment request, the Communication and having verifying the completeness of the documentation, in addition to the legitimacy of the request, proceeds to enrollment to the Special List by the fifth open market day before the end of each calendar month and, in any case, by the Record Date.

Enrollment may be subject to the receipt of further information or documentation, which the company may request, also through the Intermediary, from the Requesting Party.

The company notifies the Intermediary - without delay and however by the accounting day in which the update to the Special List is made - (i) of enrollment in the Special List, sending to the Registered Certified E-mail address of the Intermediary a copy of the completed Communication with the enrollment date to the Special List, or (ii) refusal of enrollment in the Special List, sending to the Registered Certified E-mail address of the Intermediary a copy of the completed Communication with the reasons for refusal of enrollment.

4.3 Receipt of multi-voting rights

The completion of 24 (twenty four) months from enrollment to the Special List or of the lesser period necessary for the maturation of the right for parties in possession of a Real Legitimate Right (with the relative voting rights) before the date of enrollment in the Special List and who intend to utilize the AIM Italia Vesting Period shall result in the enrollment in the relative section of the Special List of those who have met the requirements for the assignment of multi-voting rights. The Special List is updated by the company by the fifth open trading day before the end of each calendar month and, in any case, by the record date established by the applicable regulations in relation to the right to attend and vote at the Shareholders' Meeting. The same provision applies to subsequent increases, with the result that any additional increase in voting rights that has already accrued due to the passage of further 12-month periods will take effect as of the record date, even if that date precedes the fifth trading day of the calendar month following the month in which the aforementioned period expired.

5. Cancellation from the Special List

subsidiaries or exercised through trustees or nominees are also considered; those devolving on behalf of third parties are not considered".

5.1 The Company proceeds with cancellation (total or partial, according to the particular case) from the Special List in the following circumstances:

(i) revocation of the interested party;

(ii) communication of the interested party or the Intermediary proving the lapsing of the requirements for multi-voting rights or the loss of possession of the Real Legitimate Right;

(iii) where the Company receives notice of circumstances or events resulting in the lapsing of the requirements for multi-voting rights or the loss of possession of the Real Legitimate Right.

Multi-voting rights may be newly acquired with regards to the Shares for which such has been revoked, or lost in another manner, through fresh enrollment to the Special List and full completion of the Relevant Period.

5.2 Communication of revocation

The party enrolled to the Special List has the right to request at any time - through written communication to the company - cancellation (total or partial) from the Special List with consequent automatic loss of the right to the benefit of double voting rights, where matured, or of the right to acquire such, with reference to the Shares for which cancellation from the Special List has been requested.

The request should be presented through the Intermediary with whom the Shares are registered. The Intermediary sends, through Certified E-mail to the addresses votomaggiorato_computershare@pec.it and wiit@pec.wiit.cloud, the total or partial revocation communication in accordance with Article 44, paragraph 6 of the Joint Provision, specifying, where possible, the details of the Communication.

The Company, having received the request, proceeds to update the Special List. Where the indication of the Communication is absent, the Company, amid subsequent enrollments, cancels from the Special List the Shares recorded at the most recent date, in accordance with the same Article 44, paragraph 6 of the Joint Provision.

5.3 Loss of rights communication

Those in possession of the Real Legitimate Right enrolled to the Special List are required to communicate without delay to the Company any circumstance or event which involves the lapsing of the requirements to hold multi-voting rights or the loss of possession of the Real Legitimate Right, including the direct or indirect disposal of controlling investments in the cases established Article 6 below *(Loss of rights)*.

In the case of the total or partial transfer of the Shares subject of the Communication assigned multi-voting rights, or the establishment/amendment/removal of the restrictions on the above-stated Shares where this results in the loss of voting rights, the Intermediary should inform the Company, through a communication in accordance with Article 44, paragraphs 6 and 9, of the Joint Provision which indicates in addition the specific reason and, where possible, the number of the Communication.

In the other cases, the communication to the Company, with the relative reason, should be sent without delay by the interested party.

The communication to the Company is sent by Certified E-mail to: votomaggiorato_computershare@pec.it and wiit@pec.wiit.cloud.

The Company, having received the communication, proceeds to update Special List. Where the indication of the Communication is absent, the Company, amid subsequent enrollments, cancels from the Special List the Shares recorded at the most recent date, in accordance with the same Article 44, paragraph 6 of the Joint Provision.

The Company communicates - without delay and however not beyond the accounting day on which the update to the Special List is made - to the competent Intermediary the cancellation from the Special List or, according to the specific case, of the loss of multi-voting rights, for cases other than the disposal of the Shares, by certified e-mail, explaining the relative reason.

5.4 Cancellation

The Company, where receiving communication of the occurrence of the circumstances or events which prompt the lapsing of the requirements for multi-voting rights or the loss of the Real Legitimate Right, communicates such - without delay and however not beyond the accounting day on which the update to the Special List is made - to the competent Intermediary, through certified e-mail, explaining the relative reason.

6. Loss of rights

6.1 Subject to Article 7 below *(Maintenance or extension of multi-voting rights)*, multi-voting rights lapse and the party is cancelled from the Special List where:

(a) in relation to Shares subject to transfer, with or without consideration, the Real Legitimate Right is transferred, where for these purposes “transfer” is defined also as the establishment of a lien, usufruct or other restriction on the share which involves the loss of voting rights by the party in question, in addition to the loss of voting rights in the absence of such events. It is understood that the grant of a pledge in which voting rights are retained by the holder of the Real Legitimate Right will not result in loss of the multi-voting rights;

(b) where the Real Legitimate Right is held by a legal person or other entity without legal personality that is subject to control, in the event of a change of control.

7. Maintenance or extension of multi-voting rights

7.1 Enrollment to the Special List (with consequent continuance of the benefit of any multi-voting rights matured):

(a) is maintained in cases of succession by reason of death in favor of heirs (but not in favor of legatees) or free transfer by virtue of an agreement on the transfer of equity interests between family members or for the establishment and/or endowment of a trust, estate fund or foundation whose beneficiaries are the transferor or his/her legitimate heirs;

(b) is maintained in cases of merger or spin-off of the holder of the Real Legitimate Right (or of the legal person or entity that controls it) in favor of the incorporating company, resulting from the merger or beneficiary of the spin-off, on the condition that the incorporating company, resulting from the merger or beneficiary of the spin-off is a subsidiary, directly or indirectly of the same party which, directly or indirectly, controls the holder of the Real Legitimate Right (but not in other cases of spin-off or merger of the holder of the Real Legitimate Right);

(c) is maintained in cases of the transfer of a portfolio to another of the UCIT's (as defined by the CFA) managed by the same party;

(d) is maintained in cases change of control following succession by reason of death in favor of heirs (but not in favor of legatees) or free transfer by virtue of an agreement on the transfer of equity interests between family members or for the establishment and/or endowment of a trust, estate fund or foundation whose beneficiaries are the transferor or his/her legitimate heirs;

(e) extend, in the same number as the rights already accrued, to newly issued shares through share capital increases in accordance with Article 2442 of the Civil Code and share capital increases through new conferments in the exercise of rights issues originally devolving in relation to shares for which multi-voting rights have already matured;

(f) may devolve, in the same number as the rights already accrued, also in relation to exchanged shares for which multi-voting rights have been granted, in the case of the spin-off or merger of the company, where established by the relative merger or spin-off proposal. This provision also applies in the event of a cross-border merger, spin-off or transformation pursuant to Legislative Decree No. 19 of March 2, 2023.

In the case of succession upon death, merger or spin-off of the owner of the account in which the Shares are registered, where such situations are notified to the Intermediary, the Intermediary communicates to the company these events for the consequent fulfillment of requirements. In the additional cases above, the assignees of the Real Legitimate Right should present a Special List enrollment request; the preceding Article 4 *(Enrollment to the Special List and receipt of multi-voting rights)* is applied to the permitted extent.

The communication should be sent to the company by Certified E-mail to the addresses votomaggiorato_computershare@pec.it and wiit@pec.wiit.cloud.

The Company verifies the legitimacy of the request, which may be subject to the receipt of additional information or documentation, with such communicated to the Requesting Party and/or the Intermediary.

8. Communication to the public

8.1 <u>Publication of holders of a Real Legitimate Right who have been enrolled to the</u>

Special List

The company communicates, through publication on its website (www.wiit.cloud, "*Investors*" section), the details of entitled parties who have requested enrollment to the Special List, with indication of their relative holdings (however greater than the threshold indicated at Article 120, paragraph 2 of the CFA) and the enrollment date, by the fifth open trading day from the end of each calendar month and in any case by the Record Date.

8.2 Share capital changes

In accordance with Article 85-*bis*, paragraph 4-*bis* of the Issuers' Regulation, the Company communicates to the public and to Consob the total number of voting rights, with indication of the number of Shares comprising the share capital, according to the means indicated at Article 85-*bis*, paragraph 1, of the Issuers' Regulation by the fifth open trading day before the end of each calendar month during which a share capital increase or reduction of such an amount is declared, also by the day subsequent to the Record Date.

9. Duties of the Appointee

9.1 The Appointee has the following duties:

(i) monitors the Certified E-mail address for communication of Special List enrollment/cancellation requests;

(ii) responds to Intermediaries and/or Shareholders or holders of a Real Legitimate Right in relation to requests received;

(iii) updates the Special List in accordance with law and the By-Laws;

(iv) maintains the archive of correspondence and documentation concerning the Special List.

10. Changes and supplements to the Regulation

10.1 Any amendments and/or supplements to this Regulation should be approved by the Board of Directors, subject to the amendments stemming from changes to legal or regulatory provisions, which may be implemented by the Chairperson of the Board of Directors, of which the Board of Directors should be informed at the next meeting.

10.2 The Regulation, after any amendment or supplement, is published on the company website (www.wiit.cloud, "*Investors*" section).