

THE ITALIAN SEA GROUP S.p.A.  
Policy for managing the dialogue with  
Institutional Investors and Shareholders in General

## 1. THE ITALIAN SEA GROUP

The Italian Sea Group (“The Group” or “TISG”) is a Company listed on EuroNext Milan and one of the most renowned international yachting groups, main point of reference in the engineering and construction of yachts from 20 to 100 meters in length and in the refit activities of yachts up to 200 meters.

With its shipyards strategically located close to the Marina di Carrara, Viareggio and La Spezia harbours, The Italian Sea Group has launched 1,252 yachts from 1575 up to today. The brands Picchiotti, Admiral, Perini Navi, Tecnomar, and NCA Refit form part of the Group.

## 2. GOALS AND REFERENCE PRINCIPLES

The Italian Sea Group prioritises, as its duty towards the financial market, building and maintaining a constant and open relationship with Institutional Investors and its shareholders in general, to grant the maximum understanding of the activities carried out by the Group and its business model.

For this reason, the Group’s Board of Directors has adopted the following Policy (“*Shareholder Engagement Policy*”) to ensure that the dialogue with TISG’s investor is based on principles of fairness and transparency, in compliance with the community rules regarding market abuse, as well as in line with international best practices.

## 3. CORPORATE FUNCTIONS IN CHARGE OF ENGAGING WITH SHAREHOLDERS

The Company’s structure in charge of engaging with shareholders in general, with financial analysts, and rating agencies is the Investor Relations Department, reporting to the Function Administration, Finance, and Control and contactable via e-mail or phone number at the contacts shown on the website *investor.theitalianseagroup.com*.

The information shared to TISG’s shareholders by the Investor Relations Department and by any authorised corporate representative are provided in compliance with the principles of truthfulness, clarity, completeness, promptness, informational symmetry and in compliance with the “Procedure for the management and communication of privileged information” adopted by TISG’s Board of Directors and available on the Company’s website in the “Governance – Documents and Procedures” section. Furthermore, the disclosure of such information is carried out in the respect of community and national law regarding market abuse.

Whenever a Shareholder, following a conversation with the Investor Relations Department, feels appropriate to seek further insight on the topics considered relevant, they can request to the Investor Relation Department the appropriate clarifications and, whenever they deem it appropriate, a specific meeting involving the Group's qualified top managers on the topics that are object of the insight. Such topics can refer to, by way of example, the Group's pursued strategies, economic and financial performances, management of risks related to sustainability and corporate governance.

In case a Shareholder feels the need to meet the Group's Board of Directors, they will formulate a dedicated request to the Investor Relations Department, specifying the topics on which they need more insight. The Investor Relations Department will promptly notify the Chairman of the Board of Directors who, in turn, will give immediate notice to the other members of the Board. If circumstances so require, the Investor Relations Department will organise a dedicated meeting.

#### 4. SHAREHOLDER ENGAGEMENT AND COMMUNICATION CHANNELS

In order to facilitate efficiency in the dialogue with Institutional Investors and Shareholders, ensuring at the same time uniqueness and symmetry of the informational contents, TISG has provided a dedicated corporate website ([investor.theitalianseagroup.com](http://investor.theitalianseagroup.com)) which collects all documents and information that are deemed relevant, available in Italian and English.

This website provides both economic and financial information (such as Annual Reports, Half-Yearly Reports, Presentations to the Financial Community, Analyst Consensus and Stock Performance), as well as updated data and documents that could be relevant to Shareholders such as, for example, Financial Press Releases. Furthermore, these press releases are distributed according to the means provided for in the discipline dictated by Consob regarding the public disclosure of regulated information and published on the storage mechanism *emarketstorage* (SDIR).

The Investor Relations Function manages also the organisation of meetings, even remotely, with the Financial Community, such as:

- Conference calls to present periodic economic and financial results disclosed to the market;
- Meetings where the Top Management presents updates on the strategic plan to the market;
- Roadshows where the Chief Executive Officer and the Chief Financial Officer present any updates on the strategic plan, the recent economic and financial results, and any extraordinary operation.

Adding to the above, the Investor Relations function must organise other occasions to meet Shareholders, in person or remotely, one-to-one or in groups, whenever there is a request by them.

TISG's Shareholders' Meeting represents an important occasion for discussion between them and TISG's Directors.

## 5. MONITORING AND UPDATING OF THIS POLICY

This Policy has been made available on the Corporate website. The Control, Risk, and Sustainability Committee has the role of periodically verifying the correct application of this Engagement Policy, submitting to the Board of Directors any proposals for amendment or integration.