

INTERNAL DEALING CODE
OF
AQUAFIL S.P.A.

Text amended by the Board of Directors of Aquafil S.p.A. on May 14, 2024.

1. INTRODUCTION

- 1.1 This Internal Dealing Code (the “**Code**”) had been originally approved by the Board of Directors of Space3 S.p.A. (“**Space3**”) on September 12, 2017 and had entered into effect on the effective date of the merger by incorporation of Aquafil S.p.A. (“**Aquafil**” or the “**Company**”) into Space3 (which concurrently changed its name to “Aquafil S.p.A.”). It was then amended by the Board of Directors of Aquafil on May 14, 2024 following the regulatory amendments introduced by Law No. 21 of March 5, 2024.
- 1.2 In particular, this Code lays down the rules for the fulfillment by the Managers and Persons Closely Associated with Them (all as defined below), and by Aquafil, in accordance with the following, of the notification and disclosure obligations to the Company, Consob and the market in respect of Significant Transactions (as defined below) undertaken by such persons, directly or through nominees, involving shares issued by Aquafil or other financial instruments associated with such shares.
- 1.3 The provisions of laws and regulations governing such disclosure obligations (the **Provisions**) are laid down in Article 19 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council of April 16, 2014 on market abuse (the **MAR Regulation** or **MAR**), Articles 7 to 10 of Commission Delegated Regulation (EU) No. 2016/522 of December 17, 2015 (**Regulation No. 2016/522**), Commission Implementing Regulation (EU) No. 2016/523 of March 10, 2016 (**Regulation No. 2016/523**) and Regulation (EU) No. 2016/1011 (the **Benchmark Regulation** and, together with the Market Abuse Regulation, Regulation No. 2016/522 and Regulation No. 2016/523, the **EU Regulations**), as amended and supplemented, additional regulations implementing the EU Regulations, and Articles 152 *quinquies.1 et seq.* of the Regulation adopted by Consob through Resolution No. 11971 of May 14, 1999, as further amended, most recently by Resolution No. 22551 of December 22, 2022 (**Issuers’ Regulation**), and take into account the repeal of Article 114, paragraph 7, of Legislative Decree No. 58 of February 24, 1998 (the **Consolidated Law on Finance**) by Law No. 21 of March 5, 2024.
- 1.4 On the whole, the Provisions aim to prevent market abuse, and particularly the abuse of inside information, while also ensuring — to the extent of specific interest here — the appropriate transparency and uniformity of information concerning transactions that — since they are undertaken by (i) Managers, as persons who take an active part in decision-making processes or in any event have significant knowledge of company strategies, by virtue of the functions performed or their roles as shareholders with a significant interest in Aquafil or a controlling interest in Aquafil, or by (ii) Persons Closely Associated with Them — may take on the specific function of signaling to the market the perception that such persons have of the prospects of the Company and its Group.
- 1.5 The Code pursues the above aims of preventing the abuse of inside information while also establishing specific restrictions that bar Managers from undertaking certain transactions during the periods prior to the approval and circulation of the Company’s mandatory periodic accounting documents.

2. DEFINITIONS

- 2.1 In addition to the terms defined in other clauses of this Code, for the intents and purposes hereof, the following terms shall have the meanings thereto ascribed in the definitions set forth below, it being further understood that definitions of terms in the singular shall also apply to the same in the plural, and vice versa:

Shares: the ordinary shares issued by the Company.

CFO: the head of Aquafil's administration, finance and control function.

Manager: pursuant to Article 3(1)(25) MAR, this means:

- (i) the members of Aquafil's Board of Directors and Board of Statutory Auditors;
- (ii) key management personnel of Aquafil (other than the persons set out in point (i) above) who have regular access to inside information relating directly or indirectly to Aquafil and power to take managerial decisions affecting the Company's future developments and business prospects. Such key management personnel shall be identified on the basis of their roles and responsibilities within the organization by the CFO, who shall submit the list of such personnel to the Chairperson of the Company's Board of Directors for approval.

The Chief Executive Officer of Aquafil may, from time to time, identify additional Executives of the Company who, due to their roles or positions, are included among the Managers; the Disclosure Officer (as defined herein) shall be informed immediately of the identification of such Executives, and he or she shall promptly update the list of Managers pursuant to Article 7.1 (iii) of this Code and Article 19, paragraph 5, of the Market Abuse Regulation.

Significant Transactions: transactions undertaken by, or on behalf of Managers and/or Persons Closely Associated with Them, involving Shares or other financial instruments associated with them, as set out in the Provisions (see Article 19(7) of MAR and Article 10 of Regulation No. 522/2016), with the exclusion of transactions, the total amount of which does not reach €20,000 (twenty-thousand) in a single year (the **Relevant Amount**) or another amount as determined by the Provisions from time to time.

Once the Relevant Amount has been exceeded, Managers and/or Persons Closely Associated with Them must notify all transactions subsequently undertaken by year-end.

The Relevant Amount shall be calculated by adding together all of the Significant Transactions, without offsetting, undertaken on behalf of each Manager and those undertaken with Persons Closely Associated with Them.

Persons Closely Associated with Them: pursuant to Article 3(1)(26) MAR, this means:

- (i) a spouse, a partner considered to be equivalent to a spouse in accordance with applicable national law, a dependent child, in accordance with Italian law, or a relative who has shared the same household for at least one year on the date of the Significant Transaction;
- (ii) a legal person, trust or partnership, the managerial responsibilities of which are discharged by a person who has managerial, control or direction functions or by a person referred to in point (i) above, which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are essentially equivalent to those of such a person.

Disclosure Officer: the person identified by the Company's Board of Directors as responsible for receiving, handling and releasing information to the market about Significant Transactions.

Associated Financial Instruments: the financial instruments thus identified by the Provisions, pursuant to Article 3 of the MAR Regulation.

3. OBLIGATIONS TO NOTIFY CONSOB AND THE COMPANY

- 3.1 In accordance with the Provisions, Managers and Persons Closely Associated with Them are required to notify Consob of the Significant Transactions that they undertake or that are undertaken on their behalf within three (3) business days of the date of execution of the transactions concerned, not including Saturdays, Sundays and all other holidays.

Aquafil shall notify Consob of the above on behalf of the Managers and, where appropriate, of the Persons Closely Associated with Them, provided that the Managers have — including on behalf of the aforesaid Persons Closely Associated with Them — granted a specific power of attorney to Aquafil, as provided for in Article 5 below.

- 3.2 Managers and Persons Closely Associated with Them are required to notify the Company of the same Significant Transactions set out in Article 3.1, so that the Company may publish them within the terms specified in the Provisions. In this regard, see Article 5.3 below.

- 3.3 Aquafil shall publish, in a press release, the information received pursuant to Article 3.2 above within the terms established by the Provisions, while also concurrently forwarding it to the authorized storage system.

- 3.4 Managers:

- (i) shall obtain from the Persons Closely Associated with Them the information necessary to the fulfillment of the notification obligations established by Articles 3.1. and 3.2. above, where they do not fulfill such obligations directly;
- (ii) shall give written notice to the respective Closely Associated Persons of the obligations incumbent upon them in accordance with the Provisions and keep a copy of the notification given;
- (iii) obtain from the Persons Closely Associated the information needed for inclusion in the list of Managers and Persons Closely Associated with Them kept by the Company pursuant to Article 7.1 (iii) below.

4. METHODS OF NOTIFICATION TO CONSOB

- 4.1 If they do not exercise the options set out in Article 5 below, Managers and Persons Closely Associated with Them shall undertake the notifications set out in Article 3.1 by submitting the Annex to Regulation No. 2016/523 to Consob according to the terms the methods established by the Provisions (Annex A to this Code).

5. POWER OF ATTORNEY FOR AQUAFIL TO SUBMIT NOTIFICATIONS OF SIGNIFICANT TRANSACTIONS TO CONSOB

- 5.1 Managers may — including on behalf of Persons Closely Associated with Them, where authorized by such persons — grant a power of attorney to Aquafil to notify Consob of the Significant Transactions, according to the terms set out in the power of attorney (the *Power of Attorney*), on their own behalf and, where applicable, on behalf of Persons Closely Related with Them.

- 5.2 The Power of Attorney shall be granted to Aquafil by signing Section II of the form appended to this Code as Annex B.

- 5.3 Managers who have granted a Power of Attorney to Aquafil shall notify the Disclosure Officer of all transactions, regardless of the amount, even where less than the Relevant Amount,

undertaken by themselves or by Persons Closely Associated with Them within two (2) business days of the date of the transaction.

- 5.4 The Manager shall notify Aquafil in accordance with Article 5.3 by sending the Disclosure Officer the forms (Annex A to this Code), duly completed, by fax or e-mail, preceded by notice via telephone.

The Disclosure Officer shall confirm receipt of the notice immediately, by fax or e-mail to the address provided by the Manager.

- 5.5 The Disclosure Officer shall notify Consob, in accordance with the Provisions, on behalf of the Manager and/or Persons Closely Associated with Them, of the transactions reported by such persons, where such transactions reach the Relevant Amount.

- 5.6 Without prejudice to the applicable provisions of law and of Article 8 below, Aquafil shall bear no liability whatsoever for improper and/or incomplete and/or untimely notification of Significant Transactions by Managers and/or Persons Closely Associated with Them.

- 5.7 In all cases in which Managers and/or Person Closely Associated with Them are directly liable, Aquafil reserves the right to take action against them for compensation for any damages.

6. BAN OR LIMITATION OF SIGNIFICANT TRANSACTIONS (CLOSED PERIOD)

- 6.1 Pursuant to the Provisions, Managers may not undertake transactions involving the Shares or Associated Financial Instruments, whether on their own account or on account of third parties, either directly or indirectly, during the period of 30 calendar days prior to the announcement by the Company of an interim financial report or annual financial report that the Company is required to publish in accordance with applicable provisions of laws and regulations (the *Closed Period*).

- 6.2 The above is without prejudice to the power of the Board of Directors or, in urgent cases, the Chief Executive Officer:

- (i) to identify additional safeguards or circumstances in which the undertaking of Significant Transactions by Managers is subject to limits or conditions, informing the Managers and Disclosure Officer thereof immediately;
- (ii) to permit a Manager to undertake Significant Transactions during the Closed Period, where the Manager proves that the transaction cannot be carried out at another time:
 - a) in exceptional situations of personal necessity, to be assessed on a case by case basis, such as severe financial distress that necessitates the immediate sale of shares; or
 - b) due to the characteristics of the trade, where the transactions are undertaken concurrently with or in respect of employee share ownership plans or investment plans, where applicable, guarantees or rights to shares, or transactions in which the beneficial interest in the security concerned is not subject to change.

- 6.3 In the circumstances set out in paragraph 6.2(ii) above, before undertaking any trades during the Closed Period, Managers must submit a reasoned written request for authorization to Aquafil's Board of Directors at least six calendar days before the planned date of execution of the Significant Transaction. This written request must provide adequate reasoning for the Significant Transaction, describe the nature and exceptional character of the circumstances and prove that the specific transaction cannot be undertaken at a time other than the Closed Period.

- 6.4 After receiving a request pursuant to paragraph 6.3. above, the Board of Directors shall assess, on a case by case basis and at its absolute discretion, whether to grant the requested authorization, considering the extreme urgency, unpredictability, exigency and exceptional nature of the circumstances of the transaction, beyond the Manager's control, in accordance with applicable legislation.

7. DISCLOSURE OFFICER

- 7.1 The Disclosure Officer is responsible for ensuring compliance with the Code. In particular, the Disclosure Officer:
- (i) informs Managers that they are subject to the obligations set out in this Code;
 - (ii) informs all Managers in writing of the contents of this Code so that they: (i) expressly confirm that they have viewed and are fully aware of the Code, by signing Section I of the form set out in Annex B; (ii) formally grant a Power of Attorney, where applicable, by signing Section II of the said form; (iii) inform the Persons Closely Associated with Them of the existence of the conditions according to which such persons are subject to the disclosure obligations imposed by the Provisions; and (iv) consent to the processing of their personal data in accordance with applicable privacy legislation, where applicable;
 - (iii) drafts and updates the list of Managers and Persons Closely Associated with Them and keeps declarations of acknowledgement and awareness by Managers and a record of all disclosures received and made to the market and Consob.

8. FAILURE TO COMPLY WITH OBLIGATIONS

- 8.1 Failure by Managers to comply with the obligations imposed on them by this Code may be evaluated by the competent bodies as a possible violation of fiduciary duty. The competent bodies may take measures justified by the specific circumstances. If the Directors or Key Management Personnel are also employees of Aquafil, the provisions of the following paragraph shall also apply.
- 8.2 Failure to comply with the obligations set out in this Code by Managers who are employees of Aquafil may be determined by the competent bodies to be a disciplinary violation. Disciplinary measures shall be applied on a proportional basis, according to the severity and intentionality of the infraction committed, while also considering the repeat nature of the non-compliance and/or violations involved.
- 8.3 In any event, Aquafil reserves the right to seek recovery of all damages and/or liability that it may sustain due to the behavior of Managers and Persons Closely Associated with Them in breach of this Code.

9. COMMUNICATIONS

- 9.1 All communications in accordance with this Code shall be done in writing as follows:
- (i) if addressed to the Company and/or the Disclosure Officer, for the latter's attention by fax to +39 0464 532267, by e-mail to the address **internaldealing@aquafil.com**, or by registered mail with return receipt to the following address: Via Linfano 9, 38062 - Arco (Trento) - Italy;
 - (ii) if addressed to Managers, as per the addresses and contact information provided by the said persons in the acceptance form contained in Annex B hereto;
- or to different addresses that must be provided in a timely manner: (i) by the Disclosure Officer

to the Managers; or (ii) by each of the latter to the Disclosure Officer.

10. AMENDMENTS AND ADDITIONS

- 10.1 The Company's Board of Directors shall apply the amendments and additions to this Code that prove necessary or appropriate following organizational changes to the Company or amendments to applicable legislation. The Disclosure Officer may submit proposals for amendments to the Board of Directors.
- 10.2 The Disclosure Officer shall inform all persons subject to the Code of the amendments and/or additions made to the Code in writing.

Annexes:

- Annex A: Template for notification and public disclosure of transactions by Managers and Persons Closely Associated with Them and instructions for completing it (Annex to Regulation No. 2016/523)
- Annex B: Form for declaring acknowledgement and full awareness of the Code and the granting of a Power of Attorney, where applicable, pursuant to Article 4 of the Code

Annex A

Template for notification and public disclosure of transactions by Managers and persons closely associated with them.

1	Details of the person discharging managerial responsibilities/person closely associated	
a)	Name	<p><i>[For natural persons: name and surname.]</i></p> <p><i>[For legal persons: full name including legal form as provided for in the register where it is incorporated, if applicable.]</i></p>
2	Reason for the notification	
a)	Position/status	<p><i>[For persons discharging managerial responsibilities: the position occupied within the issuer, emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.]</i></p> <p><i>[For persons closely associated,</i></p> <ul style="list-style-type: none"> <i>— An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;</i> <i>— Name and position of the Relevant Person discharging managerial responsibilities.]</i>
b)	Initial notification/amendment	<i>[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]</i>
3	Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor	
a)	Name	<i>[Full name of the entity.]</i>
b)	LEI	<i>[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]</i>
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted	
a)	Description of the financial instrument; type of instrument Identification code	<p><i>[— Indication as to the nature of the instrument:</i></p> <ul style="list-style-type: none"> <i>— a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument;</i> <i>— an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance.</i> <p><i>— Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</i></p>

b)	Nature of the transaction	<p><i>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) No. 2016/522 ⁽¹⁾ adopted under Article 19(14) of Regulation (EU) No. 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No. 596/2014.</i></p> <p><i>Pursuant to Article 19(6)(e) of Regulation (EU) No. 596/2014, it shall be indicated whether the transaction is linked to the exercise of a share option program.]</i></p>	
c)	Price(s) and volume(s)	Price(s)	Volume(s)
		<p><i>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows, ...) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.</i></p> <p><i>Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with reference to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</i></p>	
d)	Aggregated information — Aggregated volume — Price	<p><i>[The volumes of multiple transactions are aggregated when these transactions:</i></p> <ul style="list-style-type: none"> <i>— relate to the same financial instrument or emission allowance;</i> <i>— are of the same nature;</i> <i>— are executed on the same day and — are executed on the same place of transaction.</i> <p><i>Using the data standard for quantity, including where applicable the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014.]</i></p> <p><i>[Price information:</i></p> <ul style="list-style-type: none"> <i>— In case of a single transaction, the price of the single transaction;</i> <i>— In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.</i> <p><i>Using the data standard for price, including where applicable the price currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation</i></p>	
e)	Date of the transaction	<p><i>[Date of the particular day of execution of the notified transaction. Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]</i></p>	
f)	Place of the transaction	<p><i>[Name and code to identify the MiFID trading venue, the systematic internaliser or the organized trading platform outside of the Union where the transaction was executed as defined under Commission Delegated Regulation supplementing Regulation (EU) No. 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No. 600/2014, or if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading venue'.]</i></p>	

(¹) Commission Delegated Regulation (EU) No. 2016/522 of December 17, 2015 supplementing Regulation (EU) No. 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions (see page 1 of this Official Journal).

I further declare that I have received the following policy statement from Aquafil S.p.A. and undertake — where appropriate — to provide a copy thereof to the Persons Closely Associated with me, as defined in Article 2 of the Procedure:

PERSONAL DATA POLICY STATEMENT

Pursuant to Article 13 of Legislative Decree No. 196/03, the “Personal Data Protection Code” (the “**Code**”), and with regard to the personal data you provide in application of the “Procedure for the disclosure of transactions involving shares issued by Aquafil S.p.A. or other associated financial instruments” (the “**Procedure**”), subject to processing, we hereby inform you that:

1. Your personal data shall be processed in accordance with the Procedure to fulfill legal obligations and for the sole purposes set out in laws and regulations.
2. Your data shall be processed using electronic or other automated instruments.
3. Providing the personal data indicated in the Procedure is mandatory. If you refuse, Aquafil S.p.A. will be unable to discharge its legal obligations, with the resulting application of the pertinent penalties.
4. The personal data that you provide will be disclosed, in accordance with Regulation (EU) No. 596/2014 of the European Parliament and the Council of April 16, 2014, Legislative Decree No. 58 of February 24, 1998 and the Regulation adopted by Consob by Resolution No. 11971 of May 14, 1999, as amended, to Consob and the public.
5. You have the right to learn, at any time, what data concerning you is held by the Data Controller and how it is used. You also have the right to have such data updated, supplemented, corrected or deleted, to request that it be frozen and object to processing (Articles 7-10 of the Code). To exercise your rights, and to obtain more detailed information about the persons or categories of persons who have come into possession of your data as data supervisors or data processors, you may contact the [“Data Subject Liaison Officer”] care of the Data Controller.
6. The Data Controller is Aquafil S.p.A. – Via Linfano 9 – 38062 Arco (Trento) - Italy – e-mail: internaldealing@aquafil.com

Aquafil S.p.A.

CONSENT TO THE PROCESSING OF PERSONAL DATA

Having acknowledged the policy statement set out above, and in accordance with Article 23 of Legislative Decree No. 196/03, **I consent** to the processing of personal data concerning me, for the purposes set out in this policy statement.

It is understood that my consent is conditional on compliance with applicable legislation.

date
(legible)

name and surname or company name of the interested person or party

(signature)

SECTION II

(APPLICABLE TO THE MANAGERS SUBJECT TO THE PROCEDURE)

I do hereby further declare that:

- I grant Aquafil S.p.A. (*Aquafil*) the **Power of Attorney** set out in Articles 5 *et seq.* of the Procedure so that it, **on my behalf and on behalf of Persons Closely Associated with myself and with the express authorization of such persons**, according to the terms and conditions laid down in the Procedure, may notify Consob of the Significant Transactions undertaken by me personally and by Persons Closely Associated with me, as set out in the “Procedure for the disclosure of transactions involving shares issued by Aquafil S.p.A. or other associated financial instruments (the *Procedure*);
- I therefore undertake to notify Aquafil, pursuant to Article 5.3 of the Procedure, of **all Significant Transactions, regardless of the amount**, even where below the Relevant Amount, undertaken by myself or on my behalf and/or by Persons Closely Associated with me or on their behalf, within two (2) business days of the date of execution thereof, by properly completing and submitting to the Responsible Function the template set out in Annex A to the Procedure;
- the Power of Attorney is valid from the date on which Aquafil receives this Form until either I or Aquafil withdraws, by written notice to be given at least five (5) business days before the effective date of withdrawal;
- Aquafil may also consider this Power of Attorney revoked, with immediate effect, without the need for any notice, if I fail to abide by the above terms and conditions of submission of disclosures as laid down in the Procedure;
- the provisions of the Procedure shall apply to all matters not governed by this Form.

date

name and surname (or company name) of the interested person or party (*legible*)

(signature)