FERRAGAMO

OPERATING PROCEDURE FOR MAINTAINING AND UPDATING THE REGISTER OF PERSONS WITH ACCESS TO INSIDE AND MATERIAL INFORMATION

APPROVED BY THE BOARD OF DIRECTORS ON AUGUST 3, 2026

Article 1 - Foreword

1.1 In compliance with the provisions contained in Article 18 of Regulation (EU) No. 596/2014 of April 16, 2014 on market abuse (Market Abuse Regulation - hereinafter "**MAR**"), as well as Commission Implementing Regulation (EU) 2026/1291 of June 12, 2026, which repealed Implementing Regulation (EU) 2022/1210 (hereinafter “**Regulation 2026/1291**”), Salvatore Ferragamo S.p.A. (the "**Company**") has established a register of persons who have access to Inside Information in the performance of certain duties and with whom there is a professional relationship, whether as employees or otherwise, such as consultants, accountants or credit rating agencies (the "**Insider Register**").

1.2 In addition to the above, the Company-taking into account the Guidelines on "Inside Information Management" published by Consob on October 13, 2017 (the "**Consob Guidelines**") has established, on a voluntary basis, a registry of persons who have access to Material Information (as defined below) and with whom it has the same type of relationship as mentioned above (the "**Register of Material Information**" or "**RIL**").

1.3 "**Material Information**" means individual pieces of information that, in the judgment of the Company, are actually material in that they may, at a later, even nearer, time, assume a privileged nature within the meaning of current regulations.

"**Inside Information**," is defined in accordance with the provisions of Article 7 of MAR as "*information of a precise nature, which has not been made public, concerning, directly or indirectly, one or more issuers or one or more financial instruments, and which, if made public, would be likely to have a significant effect on the prices of such financial instruments or on the prices of related derivative financial instruments.*"

1.4 This operating procedure (the "**Procedure**") governs how to maintain and update the Insider Register and RIL (jointly referred to as the "**Registers**"). The Procedure is also linked to the "Procedure for Internal Management of Material Information and Inside Information and the External Disclosure of Inside Information" (the "**Insider Procedure**"), as well as the "Internal Dealing Procedure."

1.5 The person in charge of maintaining the Insider Register and RIL is the Legal & Compliance Department (the "**Person in Charge**"). The Insider Register and RIL are maintained and updated by the Person in Charge on the basis of information received from the relevant Organizational Functions Responsible for Inside Information (so-called FOCIP, as defined in the Procedure), according to the rules established in the Insider Procedure, to which reference is made.

Article 2 - Insider Register

2.1 In accordance with MAR, Regulation 2026/1291 and Consob Guidelines, the Insider Register is kept in electronic format and is structured in separate sections, one for each piece of Inside Information (each, an "**Occasional Section**", corresponding to the “event-based section” referred to in Regulation 2026/1291). Each Occasional Section contains only the data of the persons having access to the specific Inside Information to which the same Occasional Section refers.

2.2 Under the Consob Guidelines, if the information concerns a prolonged process that takes place in several stages, the Occasional Section may refer to all stages of the process.

2.3 In addition, the Company may establish an additional section in which to enter the data of persons who, by virtue of the function they perform or the position they hold, have access to all Inside Information at all times (the "**Permanent Section**", corresponding to the “permanent access section” referred to in Regulation 2026/1291). If the Permanent Section is established, the personal data of the holders of such permanent access shall not be reflected in the Occasional Sections.

2.4 The Occasional Sections and the Permanent Section of the Insider Register are prepared in electronic format in accordance with the templates identified by the regulations in force from time to time and, in particular, in accordance with Model 1 (Occasional Sections) and Model 2 (Permanent Section) set forth in Annex I to Regulation 2026/1291.

2.5 The Insider Register shall be transmitted to Consob, upon its request, by the electronic means indicated by Consob on its website.

2.6 If a legal entity acts in the name of or on behalf of the Company and has access to Inside Information that directly concerns the Company (the “third-party service provider”), only the details of the natural person acting as the contact person for that third-party service provider are entered in the Insider Register, along with the name and address of the third-party service provider in the field relating to the purpose and reason for access.

Article 3 - Register of Material Information

3.1 The RIL is prepared and maintained according to criteria similar to those provided for the Insider Register under Article 2 above; however, since this register is maintained on a voluntary basis, the Company may include information fields in the RIL that differ from those in the templates set forth in Regulation 2026/1291, in accordance with the principle of data minimization.

3.2 The RIL is managed in the manner prescribed for the Insider List with appropriate adaptations to allow the Company to monitor the persons who have access to the specific Material Information.

3.3 The Register of Material Information is divided into separate sections, one for each piece of Material Information (the "**RIL Occasional Sections**"). A new RIL Occasional Section is established whenever new Material Information is identified. For each RIL Occasional Section, the persons who have access to the Material Information are indicated.

Article 4 - Method of keeping Registers

4.1 Registers are maintained by the Person in Charge, who is responsible for, among other things:

a) enroll persons who have access to Inside Information into the Insider Register, based on information received from the relevant FOCIP;

b) enroll persons who have access to Material Information in the RIL, based on information received from the relevant FOCIP;

c) update the Insider Register without delay, specifying the date and time of the event that caused the need for the update, in the following cases:

- Variation in the reasons for which an individual was enrolled;
- Enrollment of new subjects;
- Loss of access to Inside Information by one of the registered parties;

d) update the RIL whenever the need arises.

4.2 For the purposes of the above, as soon as Material Information or Inside Information within the meaning of the Insider Procedure, as the case may be, has been identified, the relevant FOCIPs shall notify the Person in Charge in writing of the names of the persons who have access to such information to be entered, as the case may be, in the RIL or Insider Register, together with the data necessary to complete the forms referred to in Regulation 2026/1291, including the position and reason for access, as well as the date and time when each individual obtained access to the information, as well as any subsequent updates.

4.3 Based on information and requests for updates from FOCIPs, the Person in Charge shall promptly update the data contained in the RIL or Insider Register, as appropriate.

The Insider Register is retained in electronic format for at least five years from the date of its creation or update, in accordance with Article 18, paragraph 5, of the MAR. Personal data relating to individuals listed in the Insider Register is retained for a period not exceeding five years from the date on which the individual is removed from the Insider Register, in accordance with Article 1, paragraph 5, of Regulation 2026/1291. The electronic format shall ensure at all times: (i) the confidentiality of the information contained therein by ensuring that access to the Insider Register is limited to clearly identified persons who need to access it due to the nature of their respective function or position; (ii) that the information in the Insider Register is accurate and up-to-date; and (iii) access to and retrieval of previous versions of the Insider Register.

4.4 Promptly once enrollment has taken place, the Person in Charge, on the basis of the forms prepared by the Person in Charge, and updated in accordance with the templates set forth in Regulation 2026/1291, sends to the enrolled person without delay:

a) communication of (i) entry in the Insider Register, together with a copy of the Insider Procedure, (ii) deletion from the same, (iii) updates to the information contained therein concerning him/her. Each person entered in the Insider Register must sign the communication sub (i), taking note of the obligations arising from having access to Inside Information and of the sanctions applicable in the event of abuse of Inside Information, market manipulation and unlawful communication of Inside Information; even in the absence of the aforementioned acknowledgement, the person will be entered with the consequent obligations against him/her.

b) notification of (i) the entry in the RIL, together with a copy of the Insider Procedure, (ii) the deletion from it, (iii) updates of the information contained therein concerning him/her.

Any updates to the obligations arising from having access to Inside Information, Material Information and the applicable penalties for market manipulation, abuse of Inside Information and unlawful disclosure of Inside Information shall be deemed to be known by registered persons and all interested parties as of the publication of the updated Procedure on the corporate intranet and on the corporate website https://group.ferragamo.com, Governance Section, Corporate Governance, Procedures.

4.5 Pursuant to MAR Art. 18(2)(2), if another person, acting in the name or on behalf of the Company, takes on the task of compiling and updating the Insider Register, the Company remains fully responsible for the obligations under MAR Art. 18. The Company always retains the right of access to the Insider Register.

4.6 The Person in Charge shall deliver copies of the information about them contained in the Registers to those who request them.

4.7 With regard to the handling, management and disclosure of Inside Information and Material Information, registered persons are bound by the obligations and compliance with the provisions set forth in the Regulations.

4.8 All data relating to individuals are processed in accordance with the rules adopted by the Company on the protection of personal data and in compliance with applicable regulations.

Article 5 - Sanctions

5.1 This Procedure is linked to the Insider Procedure, to which reference is made.

5.2 In addition to the criminal and administrative sanctions that may be imposed on the individuals who have violated the legal obligations and the provisions set forth in the Insider Procedure, the Company will proceed against those responsible by adopting the measures set forth in the labor contract regulations (if they are the respective managers or employees), as well as in the provisions of the Italian Civil Code, if the violation was carried out by individuals other than employees and managers of the Company, without prejudice to any liability of another nature.

5.3 In the event that, due to violation of the corporate disclosure provisions resulting from non-compliance with the principles set forth in the Insider Procedure, the Company incurs administrative fines in accordance with current regulations, the Company will also take recourse action against those responsible for such violations in order to obtain reimbursement of the charges related to the payment of such fines.

Article 6 - Amendments and additions

6.1 This Procedure is approved by the Board of Directors of the Company.

6.2 The *pro tempore* authorized Director in charge may make updates, additions and/or amendments to this Procedure in the following cases:

a) where formal and non-substantive;

b) resulting from organizational rearrangements;

c) determined by subsequent laws or regulations;

d) on the basis of any significant indications provided by the competent authorities;

e) on the basis of application experience or market practice.

6.3 Any updates, additions and/or amendments made to this Procedure shall be deemed known to all recipients from the date of their publication on the company intranet and on the company website at https://group.ferragamo.com, Governance Section, Corporate Governance, Procedures.