



**POLICY FOR THE MANAGEMENT OF
THE DIALOGUE WITH THE GENERALITY OF THE INVESTORS**

PREMISE

The Board of Directors of Safilo Group S.p.A. (“**Safilo**” or the “**Company**”) – upon the proposal of the Chairman of the Board of Directors, drafted in agreement with the Chief Executive Officer – has approved this policy for the management of the dialogue with the generality of the Investors (as defined below), also taking into account the engagement policies adopted by institutional investors and asset managers and in line with the recommendations of the Corporate Governance Code (as defined below), to which the Company adheres.

1. DEFINITIONS

In addition to the terms defined in other articles of this Policy, the following terms have the meanings given herebelow to each of them.

- (a) **Board of Directors:** means the Board of Directors of the Company.
- (b) **CEO:** means the Chief Executive Officer of the Company or the main person responsible for the management of the Company.
- (c) **CFO:** means the Group Chief Financial Officer.
- (d) **Chairman:** means the Chairman of the Board of Directors of the Company.
- (e) **Corporate Governance Code or Code:** means the Corporate Governance Code approved by the Corporate Governance Committee constituted by Borsa Italiana S.p.A. and other trade associations, in the pro tempore version in force.
- (f) **Directors:** means the non-executive members of the Board of Directors of Safilo.
- (g) **Investor Relator:** means the person responsible for the Investor Relator Function.
- (h) **Investors:** means the shareholders, including potential ones, of the Company, the holders of other financial instruments issued by the same, as well as those who are stakeholders in relation to the holding relationship of shares or other financial instruments and the rights deriving from them, on their own behalf or on behalf of third parties, such as intermediaries, institutional investors, financial analysts and proxy advisors.
- (i) **Policy:** means this policy for the management of dialogue with the Investors.
- (j) **Safilo Group or Group:** means the Company and the companies it controls included within the scope of consolidation.

2. PURPOSE AND SUBJECT OF THE POLICY

This Policy formalizes the Company’s approach to the management of dialogue with the Investors, pursuing the objective of raising the level of transparency and dialogue between the Investors and the Company, in the belief that the definition, development and maintenance of open, transparent and continuous forms of dialogue with the generality of the Investors and with the market brings

significant benefits to both investors and issuers, with a view to promoting the creation of value in the medium-long term.

The Policy applies to the dialogue with Investors other than during the shareholders' meeting on issues within the Board of Directors' competence, including in particular: corporate strategies, outlooks and economic-financial dynamics of the Safilo Group, extraordinary transactions, corporate governance (corporate governance system, appointment and composition of corporate bodies, including size, professionalism, independence and diversity), sustainability and social and environmental issues, remuneration policies and internal control system and risk management.

Therefore, the scope of the Policy excludes information provided to, and discussions with, shareholders in relation to, and during, the Company's shareholders' meetings as well as the exchange of information between the various corporate functions (in particular, the Investor Relator and/or the Legal and Corporate Affairs Function) and Investors that do not involve the Board of Directors and/or the CEO.

3. GENERAL PRINCIPLES

All engagement activities governed by this Policy are carried out in compliance with the general principles of transparency, timeliness, symmetry of information and correctness, so that Investors shall receive the information required by laws and regulations from time to time applicable and all other information that is considered of interest, in a clear and accessible manner.

The dialogue takes place in compliance with the regulations in force, as well as the regulations and procedures adopted by Safilo, and in particular the "Procedure for the Management and Dissemination of Inside Information", published on the corporate website, in the section "Governance – Governance System – Articles of Association and Company Documents".

These principles shall apply to all information disseminated by the Company within the scope of application of this Policy, it being understood that the above mirrors the principles adopted and applied by the Company for any activity related to the management of the dialogue and communication with the public. In order to comply with any obligation regarding the dissemination or communication of information by the Company, the same carries out all necessary or appropriate activities, including:

- (i) publishing press releases;
- (ii) requesting the Investor, if necessary, to enter into confidentiality agreements;
- (iii) taking legal actions to protect its interests.

Investors remain, however, responsible for any use of information received from the Company that constitutes a violation of a legal obligation or that is detrimental to the interests of the Safilo Group or third parties.

4. BODIES RESPONSIBLE FOR THE IMPLEMENTATION AND MONITORING OF THE POLICY

The CEO is responsible for the management of the dialogue with the Investors in coordination with, and with the assistance of, the Chairman, the CFO and the Investor Relator.

The Chairman, with the support of the CEO, updates the Board of Directors on the progress and development of the dialogue with the Investors on an annual basis, or at the first useful meeting, should significant contents and/or urgent critical issues emerge within such dialogue.

The Board of Directors monitors the correct implementation of this Policy and its adequacy over time, submitting it to review in the event of (i) developments concerning (a) the laws and regulations applicable from time to time or (b) the best practices of the financial markets, both domestic and international, as well as (ii) changes in the organizational structure of the Company and the Safilo Group. To this end, it is the task of the Chairman, with the support of the CEO, to draw up proposals for changes to the Policy to be submitted to the Board of Directors.

5. DIALOGUE TOOLS AND METHODS

5.1 How to open the dialogue

The dialogue can be opened:

- (a) upon the request of an Investor, if the same deems it necessary to establish a direct dialogue with the Board of Directors and/or CEO; or
- (b) on the initiative of the Company, through the organization of meetings with one or more Investors.

5.2 How to contact the Company

The Company may be contacted in relation to engagement activities through the Investor Relator, who then informs the CEO and the CFO, taking into account the following elements, which must be specified by the requesting Investor:

- a. the topics proposed for discussion within the context of the dialogue;
- b. the reasons for which the dialogue is requested;
- c. the modalities with which it is proposed to carry out the dialogue;
- d. the representatives of the Investors who would like to participate in the dialogue.

5.3 Assessment of the request for dialogue

The CEO, with the support of the CFO and the Investor Relator, assesses whether the requested dialogue is in the interest of the Company, with a view to the medium-long term and the sustainable development of the Group, and determines whether this request can be accepted or should be refused, giving instructions to the Investor Relator to report on the matter to the requesting Investor.

For the purposes of his/her assessment, the CEO may take into account, for example, factors such as:

- (1) the relevance that the topics to be covered may also have for other Investors;
- (2) the characteristics and size of the Investors requesting the establishment of the dialogue;
- (3) the reasons given by the requesting Investors and the presence of potential conflicts of interest;
- (4) the recommendations of proxy advisors and the voting policies of asset managers or the outcome of previous shareholders' votes;
- (5) the relevance of the dialogue in the perspective of creating value in the medium-long term.

5.4 Modalities and participants in the dialogue

The CEO, with the help of the CFO and the Investor Relator:

- defines the modalities through which the dialogue with the Investors takes place, ensuring that they are in the interest of the Company, in terms - for example - of the choice between in-person meetings or the use of other means of communication, the number of meetings to be held, the number of people participating (and therefore whether the meeting should take place bilaterally, and therefore with the participation, from time to time, of only one Investor, or collective, and therefore with the simultaneous participation of several Investors);
- coordinates the collection of information from the competent Company's functions that are functional to the dialogue with the Investors;
- identifies the participants - on behalf of the Company - in the dialogue with the Investors, choosing between: the Directors, the CFO and other managers or employees who have the most appropriate knowledge and skills to provide information relevant to the dialogue with the Investors.

Should a Director receive a request for meetings or information from Investors, he/she is required to promptly inform the Chairman, who will inform the CEO, so that the provisions of this Policy may apply.

5.5 Timing of the dialogue

The dialogue with the Investors, initiated upon their express request or on the initiative of the Company, according to the forms and methods indicated in this Policy, may take place throughout the year, without prejudice to the so-called "*silent period*", i.e. the 30 calendar days preceding the communication to the public of the annual or half-yearly results that Safilo is required to make public pursuant to the legislation in force from time to time as well as the quarterly Key Performance Indicators, as well as the approval of a possible business plan of the Company. However, dialogue initiatives are allowed, even during this period of abstention, provided that the topic under discussion relates to non-financial matters.

6. OTHER METHODS AND CHANNELS FOR THE MANAGEMENT OF THE DIALOGUE WITH THE INVESTORS

The Company's dialogue with Investors and, more generally, with the financial market is also carried out through methods and channels of communication that are not regulated by this Policy, but which are referred to below for immediacy and appropriate information:

1. the Company's corporate website, where all information of interest to the Investors is made available in an accurate and timely manner;
2. presentations via audio/video webcasts and/or conference calls regarding the economic and financial results or other significant events for the Group;
3. roadshows, investor days or other meetings with one or more Investors;
4. participation in industry conferences or other events which may allow to provide information to the Investors.