



POLICY FOR MANAGING DIALOGUE WITH THE GENERALITY OF SHAREHOLDERS

Document approved by the Board of Directors of Olidata S.p.A. at its meeting on January 28, 2025

1. Background

The Board of Directors of Olidata S.p.A. (“**OLIDATA**” or the “**Company**”) believes in the importance of engaging in transparent, active and constructive communication with the generality of its shareholders (the “**Shareholders**”).

Indeed, dialogue with Shareholders provides an opportunity to share with them the actions and strategic visions underlying corporate management. At the same time, it is a valuable source of information that must also be taken into account in defining the vision that inspires the Company's operations, as well as the activities aimed at ensuring the *standards of governance* that the Company has committed to pursue.

In order to promote an open and constant dialogue with all its Shareholders, and taking into account the recommendations in this regard by the Corporate Governance Code for Listed Companies to which the Company adheres, at its meeting of January 28, 2025, the Board of Directors adopted, at the proposal of the Chairman, formulated in agreement with the Company's Chief Executive Officer, this policy for the management of dialogue with the generality of Shareholders (the “**Policy**”), which spells out the general principles, management methods and main contents of the dialogue between OLIDATA and its Shareholders.

The activities aimed at establishing a dialogue between OLIDATA and its Shareholders mainly consist of making documentation such as financial statements, press releases, and presentations available on the company's *website* and the possibility of direct contact between the Company and Shareholders through the Investor Relations function; in addition, for institutional investors the Company organizes *one-to-one meetings, group meetings, presentations, investor days, roadshows, conference calls* or virtual meetings.

The Policy does not cover:

- (i) dialogue management activities carried out by the Company that fall within the scope of responsibility of the various corporate functions that do not pertain to issues of *corporate governance*, financial and accounting reporting, sustainability, remuneration policy, control system and risk management;
- (ii) (ii) dialogue activities, both proactive and reactive, with investors related to Shareholders' Meetings, as regulated by laws and regulations;
- (iii) (iii) requests for dialogue with the Company that come from individuals (such as customers, suppliers, other stakeholders) who, while qualifying as Shareholders, are motivated by interests other than that related to their own investment, present or potential, in the Company's capital: these relationships will be governed by the various tools, policies and organizational arrangements provided in relation to the prevailing interest of the interlocutor.

2. General principles

The Board of Directors ensures that the Company pays special attention to the management of the Dialogue with Shareholders (the “**Dialogue**”) and that, to this end, each function involved in the Dialogue has adequate resources and means to organize, manage, protect and facilitate the Dialogue, in accordance with the following principles:

- a) **Transparency**: information provided to Shareholders under the Dialogue shall be clear, complete, correct and truthful and not misleading or confusing, enabling Shareholders to develop an informed and complete assessment of the Company.
- b) **Timeliness**: the Company shall ensure, through the Chief Executive Officer, supported by the *Investor Relations* function, that the financial and non-financial information made available on the Company's *website* and the responses to requests for clarification and in-depth analysis submitted by Shareholders are provided in a congruous timeframe that takes into account the regulations in force for listed companies and the Company's operations.

- c) Equal treatment and information symmetry: the Company undertakes to distribute to all Shareholders the information they need to enable them to fully exercise their rights, through the most appropriate means of communication. In addition, the Company ensures that the Dialogue is conducted with full respect for the equal treatment of Shareholders, who will therefore be subject to identical conditions.
- d) Regularity: OLIDATA undertakes to provide for the regular publication of information having a continuous, periodic or extraordinary nature, so that Shareholders can be aware of the main developments concerning the Company.
- e) Compliance: OLIDATA complies at all times with the provisions of the law and internal *governance* rules, including in particular those dictated on market abuse as set forth in Regulation (EU) No. 596/2014 and its implementing provisions (“**MAR**”), transposed by OLIDATA, inter alia, in the “*Procedure for Internal Management and External Disclosure of Inside Information.*” The Company also ensures, in all cases, the application of the principles of cooperation and transparency with the competent authorities.

3. The Dialogue

OLIDATA communicates and interacts with the generality of Shareholders on an ongoing basis in a variety of ways, including, in particular (i) the *website*; (ii) the publication of press releases and other documents; (iii) the Shareholders' Meeting; (iv) the *Investor Relations* function as the contact unit for all Shareholders and other relevant functions from time to time; and (v) periodic meetings with the financial community, institutional investors, and analysts.

4.1. The website

The website www.olidata.com (the “**Website**”) is the main channel for communicating information about the Company to Shareholders so that they are informed in a timely manner and can deepen their understanding of the Company.

In accordance with the general principles set forth in the Policy, all information on the Site must be clear, complete, up-to-date, accurate and truthful to enable Shareholders to develop a truthful opinion.

The “*Investor Relations*” section of the Site also makes available the financial statements of the Company and its parent Group, as well as information on stock performance and financial results, which are useful for Shareholders to evaluate their investment choices. The same section also makes available the Company's press releases, notices and other information including the calendar of corporate events prepared in accordance with the instructions of Borsa Italiana S.p.A.

The Company also takes care to keep the Site updated with information regarding major events in which the Company participates.

4.2. Press releases and documents

OLIDATA publishes press releases and documents on the Site in order to ensure that all Investors have timely knowledge of the company's activities and corporate affairs, and also provide an opportunity for in-depth analysis.

The publication of press releases and documents is done in compliance with the current regulations on relevant communications and MAR through the 1INFO SDIR regulated information dissemination system and the 1INFO Storage mechanism (www.1info.it).

4.3. Shareholders' Meeting

The Shareholders' Meeting is a fundamental appointment for OLIDATA and its Shareholders as it represents the institutional moment of privileged meeting between the Company's Board of Directors and its Shareholders.

In light of this, OLIDATA is committed to facilitating and soliciting the participation of Shareholders in the Shareholders' Meeting by making available to them-in the appropriate section of the Website-all the information required by the regulations in force for listed companies, respecting the terms indicated by the legislator.

The Company, moreover, makes itself available for any clarifications and/or in-depth analysis regarding attendance at each Shareholders' Meeting. In fact, Shareholders are allowed to ask questions on the items on the agenda even before the Shareholders' Meeting, and such questions shall be answered within the terms from time to time indicated in the notice of meeting. The Company may provide a unified response to questions having the same content.

4.4. Request for Dialogue through the Investor Relations function (the "Dialogue Request")

OLIDATA ensures an open and transparent process aimed at guaranteeing Shareholders the possibility of contact with the Company even at other times of the year than the Shareholders' Meeting. Indeed, it is possible to propose the establishment of a direct confrontation to request information, and/or communicate one's views by contacting the Company's Investor Relations function through the following e-mail address: investor.relations@olidata.com.

The aforesaid function will endeavor, through the assistance, if appropriate, of the corporate function competent with reference to the matter brought to the attention of the Company, to ensure that timely response to the Requests for Dialogue formulated by Shareholders is guaranteed, in compliance with: (i) the general principles defined by the Policy; (ii) the Company's provisions on *market abuse*; as well as (iii) MAR regulations.

The Request for Dialogue shall expressly indicate: (i) the topic(s) proposed to be dealt with in the Dialogue; (ii) an anticipation of the possible opinion/position of the Shareholder(s) with respect to the proposed topic; (iii) the manner in which the Dialogue is proposed to be conducted; and (iv) the representatives of the Shareholders who would like to participate in the Dialogue and their contact information.

The preliminary activity, organization and management of the Request for Dialogue, as provided for in Article 4 below, is coordinated by the Chairman of the Board of Directors or the Chief Executive Officer, who will avail themselves where necessary of the support offered by the Investor Relations Department and the Company's legal department.

4.4. Meetings with the financial community, institutional investors and analysts

OLIDATA believes that comprehensive and timely communication with institutional investors, the financial community, and analysts is a strategic lever of value creation.

Any meetings with institutional investors are conducted in compliance with the general principles defined in this Policy, relevant national and international regulations, and market practices.

Meetings are attended by the *Investor Relations* Department, the *Chief Executive Officer*, the Chief Financial Officer and, if necessary, other representatives of the Company's management as deemed necessary from time to time.

5. Method of handling the Dialogue Request

The Request for Dialogue by Shareholders may be received by the Company at any time of the year, with the exception of the so-called “*black-out periods*,” i.e., during the 30 calendar days preceding the public announcement of the results for the period that the Company is required to make public pursuant to the *pro tempore* regulations in force. In any case, even during “*black-out periods*,” initiatives of Dialogue with the shareholders on voting matters functional to their participation in the Shareholders' Meetings or other dialogue initiatives that are deemed necessary or even appropriate for the Company.

In providing feedback to the Request for Dialogue, several factors are taken into account, even in conjunction with each other, such as:

- the previous activation, on the same topics, of other forms of Dialogue;
- the potential interest of the topic to be discussed for a greater or lesser number of Shareholders and/or for Shareholders with particular characteristics, where appropriate also taking into account the number of requests received, also previously, on the same topic;
- the size and characteristics of the Shareholders concerned by the Dialogue and/or the size and nature of their investment;
- the outcome of previous shareholders' meeting votes;
- the presence of any voting policies or voting recommendations unfavorable to the Board of Directors' proposals;
- the presence of any situations of conflict of interest, even potential, of Shareholders with respect to OLIDATA;
- the actual relevance of the Dialogue and its foreseeable usefulness, including in the perspective of value creation in the medium to long term;
- the foreseeable approach of the Shareholders with respect to the subjects of the Dialogue, also taking into account any *engagement* policies.

In particular, it is up to the Board of Directors or the Managing Director to assess whether the request is in the interest of the Company or whether the Dialogue can be carried out in compliance with the law, thus carrying out any consequent activity deemed necessary or appropriate. For the purpose of making this assessment, additional information may be requested from the Shareholder through the *Investor Relations* function.

Should the Company deem it necessary to reject the Request for Dialogue, the Managing Director will, through the *Investor Relations*, promptly notify the Shareholder concerned of the reasoned decision.

Finally, following the outcome of the Dialogue, the Managing Director will consider whether to make public the information and/or clarifications provided.

6. Dialogue Themes

OLIDATA, through the methods indicated above, provides Investors with information on its activities, strategies and *performance*.

It is understood that the Dialogue will always take place in compliance with legal obligations with particular reference to the prohibitions of selective disclosure of *price sensitive* information. The Company also takes care to ensure that material information (i.e., likely to become *price sensitive*) is not disclosed, i.e., information that by its nature or due to contractual obligations is to be considered confidential, including information whose disclosure could harm the corporate interest.

The disclosure made by the Company is proportionate and adequate with respect to the interests of

OLIDATA and its subsidiaries and Shareholders, as well as fair and consistent with the information already made public by the Company.

It being understood that Investors are responsible for any use of information received by the Company that constitutes a violation of a legal obligation or is detrimental to the interests of the Company, its subsidiaries, and/or third parties.

7. Divulgazione e monitoraggio

The Policy will be published and made available to Shareholders and the public on the Company's Website at www.olidata.com.

A description of this Policy will also be included in the “*Report on Corporate Governance and Ownership Structure*” prepared annually by the Company pursuant to Article 123-bis of Legislative Decree No. 58 of February 24, 1998.

The Chief Executive Officer, supported by the *Investor Relations* Department, is responsible for the proper application of this Policy.

Feedback on the Policy and the Shareholder Dialogue management activities is provided annually in the Report on Corporate Governance and Ownership Structure. The Chief Executive Officer ensures that the Board of Directors is in any case informed, by the first useful meeting, of the development and significant contents of the Dialogue that has taken place with the Shareholders, in line with what is suggested by Recommendation 3 of the *Corporate Governance Code*.

The Policy may be updated or amended by the Board of Directors upon the proposal of the Chairman or the Chief Executive Officer.