webuild

2026

Procedure for Managing Inside and Relevant Information and their relative Registers

Approved by the Board of Directors on September 23, 2026

webuild

Summary

1 SUMMARY AND SCOPE 3

2 APPLICATION SCOPE/RECIPIENTS 3

3 REFERENCES 3

4 DEFINITIONS 4

5 SUBJECTS WHO MANAGE THIS PROCEDURE AND THEIR RELATIVE FUNCTIONS 5

5.1 PRIVILIGED INFORMATION MANAGEMENT FUNCTION (PIMF) 5
5.2 PRIVILIGED INFORMATION ORGANIZATIONAL COMPETENT FUNCTIONS (PIOCF) 5
5.3 PIOCF IN CHARGE 6
5.4 INFO ROOM 6
5.5 PERSON RESPONSIBLE FOR THE REGISTERS 6
5.6 REGISTERED SUBJECTS 6

6 RELEVANT AND PRIVILIGED INFORMATION AND ITS MANAGEMENT 7

6.1 IDENTIFICATION OF SPECIFIC RELEVANT/PRIVILIGED INFORMATION 7
6.2 MANAGEMENT OF SPECIFIC RELEVANT/PRIVILIGED INFORMATION 7

7 KEEPING AND UPDATING REGISTERS 7

7.1 STRUCTURE AND CONTENT OF THE PRIVILIGED INFORMATION REGISTER 7
7.2 STRUCTURE AND CONTENT OF THE RELEVANT INFORMATION REGISTER 8
7.3 REGISTER ENTRY 8
7.4 UPDATING OF REGISTERS 9
7.5 KEEPING REGISTERS 9

8 PROTECTION OF INSIDE AND RELEVANT INFORMATION. GENERAL PRINCIPLES 9

9 PROVIDING DOCUMENTS AND RELEVANT AND PRIVILIGED INFORMATION TO THE PUBLIC 10

9.1 PRESS RELEASES 10
9.2 MEETINGS WITH THE FINANCIAL COMMUNITY 10
9.3 COMPANY WEBSITE 11

10 PROCEDURE FOR USING THE DELAY OPTION WHEN PROVIDING PRIVILEDGED INFORMATION TO THE PUBLIC 11

10.1 CONDITIONS THAT ACTIVATE THE DELAY PROCEDURE 11
10.2 RIGHTFUL INTERESTS 12
10.3 ACTIVATING THE DELAY PROCEDURE 12

11 SANCTIONS 13

12 AMENDMENTS AND INTEGRATIONS 13

13 ATTACHMENTS 13

1 SUMMARY AND SCOPE

This document ("**The Procedure**"), which has been prepared to comply with dispositions and further documents as per paragraph 3, aims at regulating the process for managing and treating Inside and Relevant Information concerning Webuild S.p.A. ("**Webuild**" or "**The Company**"). This Procedure does not apply to the management of commercial information or communications of transactions concerning securities and other financial instruments carried out by the so-called "Relevant Persons", which are regulated in the Webuild Code of Conduct in relation to Internal Dealing.

This Procedure, in particular, defines the general principles and related implementing methods for:

- identifying, assessing, qualifying and classifying Inside and Relevant Information;
- the subjects involved in the process for identifying and managing Inside and Relevant Information and their relative responsibilities;
- drawing-up, updating and keeping lists of people who have access to Inside and Relevant Information;
- activating and implementing the delay procedure;
- communicating information externally.

This Procedure is valid from its issue date, remaining permanently valid, unless integrations or substitute procedures are issued.

2 APPLICATION SCOPE/RECIPIENTS

This Procedure addresses and applies to all subjects who, due to their work/profession or activities carried out for Webuild have access to Inside and Relevant Information.
More specifically, recipient subjects of this Procedure are:
- Webuild directors, statutory auditors, managers and employees;
- all other subjects, different to those mentioned in the previous point, who work for Webuild.

This Procedure also guides and directs, as per Article 114 paragraph 2 of the Consolidated Financial Act (as hereinafter defined), Subsidiaries, especially with regard to the Subsidiaries that are strategically Relevant, as stated and requested and in the limits of current regulations.

3 REFERENCES

This Procedure, in particular, refers to:
a) current regulatory dispositions in force from time to time, especially with regard to
   - Italian Legislative Decree of February 24, 1998, no. 58, "*Testo Unico delle disposizioni in materia di intermediazione finanziaria*" and subsequent amendments and integrations ("Consolidated Financial Act");
   - CONSOB Regulation adopted with resolution no. 11971of May 14, 1999, and subsequent integrations and amendments ("Issuers' Regulation");
   - EU Regulation no. 596/2014 ("MAR Regulation") and execution dispositions (particularly Execution Regulation (UE) n. 2026/1291[1], no. 378/2016[2] and no. 1055/2016[3] and Delegated Regulation (EU) 2026/789 of the European Commission[4]);
   - Regulation for Markets Organized and Managed by Borsa Italiana S.p.A. and relevant instructions;
   - Consob Guidelines – Management of Inside Information (October 2017 Edition);
   - European Securities and Markets Authorities (ESMA) orientation and other documents.
   - Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) and Italian Legislative Decree No. 196 of 2003, as amended by Legislative Decree No. 101 of 10 August 2018, as well as the applicable Guidelines and any legislation in force from time to time;
   - Corporate Governance Code for listed companies;

b) and the following documents approved by Webuild and in force from time to time:
   - Internal Control and Risk Management System Guidelines;
   - Code of Ethics;
   - Organization, Management and Control Model, in compliance with Legislative Decree no. 231/2001);
   - Anti-corruption Model;

[1] It establishes technical implementation norms as regards the format of the list of people with access to Inside information;
[2] It establishes technical implementation norms as regards the timings, the format and the model of the notifications sent to the competent authorities;
[3] It establishes technical implementation norms as regards the technical instruments for adequately communicating Inside information to the public and for delaying its communication to the public.
[4] Supplementing Regulation (EU) No 596/2014 as regards the disclosure of inside information in protracted processes and delayed disclosure of inside information.

- Procedure for Managing communications that are sent externally;
- Guidelines for the Document Classification Procedure;
- Code of Conduct in relation to Internal Dealing;
- Policy for managing a dialogue with general Investors.

4 DEFINITIONS

Types of Relevant Information

Information that the Company, through reasonable judgement and based on a preliminary foreseeable assumption, generally considers Relevant as it concerns data, events, projects and circumstances that, in a continuous, repetitive, periodic, occasional or unexpected manner, directly concerns the Company, and which can also even be considered Inside Information later on.

Attachment 2 includes:

a) non-exhaustive example cases of events/activities/information capable of qualifying information relating to them as Relevant and/or Inside, but each case still needs to be considered separately;
b) corporate functions normally involved in managing these types of events/activities/information.

This Specific Relevant Information is written in a specific Relevant Information Register.

Specific Relevant Information

Single information, identified each time according to the list of Types of Relevant Information, which are thought to become at a later date, most probably, Specific Inside Information.

Relevant Information Register (hereinafter also SIG Register)

The Register including all Specific Relevant Information, gathered as time goes by, and the names of the people who have access to this information. It is created voluntarily by Webuild, to better manage and monitor information flows capable of creating Specific Inside Information.

This register is prepared and kept as required for keeping the Relevant Information Register.

Inside information

Information, to be qualified as Inside Information must:

a) relating directly to the Company;
b) still have not been made public;
c) be of a precise nature i.e.:

- set of circumstances which exists or which may reasonably be expected to come into existence or to an event which has occurred or which may reasonably be expected to occur;

- specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of Webuild's financial instruments or related derivative financial instrument. In the case of a protracted process that is intended to bring about, or that results in, particular circumstance or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstance or that future event, may be deemed to be precise information. An intermediate step in a protracted process shall be deemed to be Inside Information if, by itself, it satisfies the criteria mentioned in this paragraph[5];

[5] In this regard, the *Considerando* no. 17 of the MAR Regulation states that the information connected to an event or to a series of circumstances constituting an intermediate phase in a prolonged process may relate, for example:
- the state of contractual negotiations;
- terms provisionally agreed in contract negotiations;
- the possibility to the placement of financial instruments;
- conditions under which these financial instruments will be marketed;
- provisional terms for the placement of financial instruments; or
- the consideration of the inclusion of a financial instrument in a major index or the deletion of a financial instrument from such an index

- material: i.e. if it were made public, would be likely to have a significant effect on the prices of Webuild's financial instruments or on the prices of connected derivative financial instruments. An information whicht, if it were made public, would be likely to have a significant effect on the prices of financial instrument and or on the prices of derivative financial instruments, shall mean information a reasonable investor would be likely to use as part of the basis of his/her investment decisions.

With regard to Subsidiaries, especially the Subsidiaries that are strategically Relevant, they collect all information deemed Relevant or Inside for Webuild, considered the significance of the event concerning the Information, and assessed each time.

Specific Inside Information

Single Inside Information identified each time by the Company.

Information

Inside and Relevant Information, combined.

Inside Information Register (hereinafter also "INSIDER Register")

The register established by Webuild pursuant to Article 18 of MAR and Templates 1 and 2 set out in Annex I to Commission Implementing Regulation (EU) 2026/1291 of 12 June 2026 (attached hereto as Annexes 3 and 4, respectively), in which are recorded, respectively, the Specific Inside Information identified from time to time and, in compliance with the applicable data protection legislation, the details of the persons having access thereto, as well as the details of the persons who have permanent and ongoing access to all Inside Information.

Registers

The Inside Information and Relevant Information Registers, combined.

5 SUBJECTS WHO MANAGE THIS PROCEDURE AND THEIR RELATIVE FUNCTIONS

The subjects involved for various reasons in the process for managing Inside and Relevant Information, who must apply this Procedure are as follows:

5.1 The Inside Information Management Function (PIMF)

The organizational function that mainly manages and applies this Procedure. It has the authority, resources and skills needed for fully and promptly carrying out the tasks connected to the mandatory obligations set by the regulations for managing Inside Information.

In Webuild, the Inside Information Management Function (PIMF) is carried out by the Chief Executive Officer, who, with the PIOCF and the Person Responsible for the Registers - according to what is written in the following paragraphs carries out the following:

a) mapping of the Types of Relevant Information and relevant updating;
b) identification of the Specific Relevant Information and Specific Inside Information;
c) identification and eventual change and update of the PIOCF in Charge;
d) making decisions regarding the publication timings of the Specific Inside Information and the eventual activation of the delay procedure, even if, in some cases, this can be determined directly by the Board of Directors, should conditions be met, as it falls under the area of responsibility of this body, according to the timings set by applicable Law;
e) dispositions to the Person in Charge of the Registers and updating of the Registers and to the PIOCFs, according to one's area of responsibility.

5.2 Inside Information Organizational Competent Functions (PIOCF)

PIOCFs are Company functions that, for various reasons, are involved in creating, dynamically managing and treating Inside and Relevant Information flows.

These shall guarantee, within their area of activity and responsibility, preliminary activities for registering and identifying

Specific Inside and Relevant Information, correctly managing and safeguarding information confidentiality, from when the PIOCF and its collaborators acquire this data.
Attachment 2 lists the FOCIPs involved in the various Relevant Information Flows.

5.3 PIOCF In Charge

The PIOCF, based on the activities and responsibilities attributed to them according to the organizational structure of the Company, shall identify Inside and Relevant Information regarding one's area of activity, and the people to include so as to update the Registers, as detailed in paragraph 6.1

The PIOCF in Charge, in Webuild, shall be identified, autonomously, by the PIMF, according to the Types of Relevant Information.

5.4 Info Room

Structured coordination body that comprises the Chief Financial Officer and the Head of following departments: General Counsel, Corporate Affairs (even with the functions of the Person in Charge of the Register), Corporate Identity, Communication and Institutional Affairs and Investor Relations.

The Info Room shall carry out the eventual consulting and support function towards the PIMF and the PIOCFs in Charge, with regard to:

(i) the identification of Specific Inside and Relevant information.
(ii) decisions regarding the issuing times of the Specific Inside Information, and the eventual activation of the delay procedure.

5.5 Person in Charge of the Registers

The Person in Charge of the Registers is the person who, on behalf and for and according to the indications of the PIMF, keeps and updates the Registers. The Person in Charge of the Registers, in particular:

- having received communications from the PIMF and from the PIOCFs in Charge, each according to their area of responsibility, shall promptly note everything in the Registers (entries, updates or cancellations);
- sends, to the Registered Subjects, the information regarding the new entries/changes/cancellations made in the Registers and collects the related Acceptance Statements, which state that one knows their legal and regulatory obligations that derive from having Inside Information, and the sanctions that can be applied should the Inside Information be unlawfully communicated;
- communicates, prints, archives and files the data in the Registers and any other documentation, as well as providing the information required by the PIMFs and by the competent bodies, with regard to the data included in the Registers.

For the activities of data entry, updating and cancellation of Registers, the Person in Charge of the Registers can be supported by collaborators, who shall then act on behalf of the Person in Charge of the Registers, under his/her responsibility ("**Collaborators of the Person in Charge of the Registers**").

The Person in Charge of the Registers shall not be responsible for verifying if the data that has been communicated is correct, complete or true, but shall merely add this data to the Registers.

The Person Responsible for the Registers, in Webuild, is the Corporate Affairs Director *pro tempore*.

5.6 Registered Subjects

The physical and legal subjects and entities (even without a legal personality), included in the Registers, and who/which are called to act upon the adoption of all the necessary means for safeguarding any Specific Relevant or Inside Information possessed, in compliance with applicable statutes and regulations.

The people possessing Inside Information are subject to specific obligations and bans, according to the Law. Each recipient shall be fully responsible for knowing and applying EC regulations and national statutes.

Attachment 1 – "Inside and Relevant Information Management Flow Chart", schematically, includes said functions and all relevant roles for managing this Information, as explained in detail from paragraph 6 onwards.

6 RELEVANT AND INSIDE INFORMATION AND ITS MANAGEMENT

6.1 Identification of Specific Relevant/Inside Information

Specific Inside and Relevant Information shall be identified, each time, by the PIMF, independently or according to what has been communicated by the PIOCF in Charge, which/who has this particular obligation:

a) to promptly inform the PIMF and Person in Charge of the Registers of the possible existence of a Specific Relevant/Inside Information, stating:
   - the description of the Specific Relevant/Inside Information;
   - the reasons why said Information is deemed to be or represent a Specific Relevant/Inside Information;
   - the list of all the people who, according to what is known by the PIOCF in Charge, already have this information with the related e-mails and phone numbers (if these subjects are not directly hired by the Company or Subsidiary);

b) should the PIMF confirm that the information that has been reported integrates the data of a Specific Relevant/Inside Information, all information at point a), already sent to the PIMF, and the evidence of what has been decided by the PIMF, with the date and hour of when this decision was taken, shall be provided to the Person in Charge of the Registers;

c) update the Person in Charge of the Registers on developments relating to the information provided to the FGIP referred to in paragraph (a), with particular regard to updates concerning the persons to be entered in the relevant open section of the Register.

Alternatively, instead of the PIMF, the identification of the Specific Relevant/Inside Information can be carried out by the Board of Directors, if the information concerns the Board in any way, and if a quick resolution is guaranteed. In this case, the Person in Charge of the Register shall be promptly informed, for all related activities connected, by the Chairman of the Board of Directors or by the Secretary of the Board of Directors.

6.2 Management of Specific Relevant/Inside Information

After having identified the Specific Relevant/Inside Information, in the abovementioned ways:

- the Person in Charge of the Registers - having received the authorization by the PIMF/Board of Directors and the PIOCF in Charge, shall then open and update the Registers, according to what has been stated in paragraph 7, which follows;
- the PIOCF in Charge, the other PIOCFs and, in any case, all registered Subjects, shall then manage the Information according to the general principles of paragraph 9, which should be consulted for this purpose.

7 KEEPING AND UPDATING REGISTERS

7.1 Structure and Content of the Inside Information Register

The Inside Information Register is updated in e-format, even through specific software.

This Register includes all those with access to Inside Information with whom Webuild has currently a professional relationship, be it through a direct hiring or other type of contract, and who, for purposes connected to the work they are carrying out, have access to Inside Information.

This Inside Information Register is divided into specific sections ("**Occasional Sections**"), each one for a Specific Inside Information.

There is also a **Permanent Section** containing the names and data of the people who have continuous and permanent access to all Inside Information, as identified pursuant to Section 7.3 below, and whose name will not, therefore, be placed in the single Occasional Sections each time.

The Register shall, at least, contain the following information:

- the identity of everyone who has access to Inside Information. In the case of a legal person/entity, the data of the persons working for these subjects, who according to what is known by the company, have also access to Inside Information, must also be included.
- the description of the role/function/reason for which the person has been included in the Inside Information Register

or has been cancelled or has been updated;
- the date and hour when the person had access to the Specific Inside Information or has stopped accessing it, (i.e. Occasional Sections), or date and hour when the person was registered or cancelled in the register (i.e. Permanent Section).

The Register shall also include any additional information provided by the Registered Subjects and required by the applicable laws and regulations, in accordance with the templates set out in the Annexes to Commission Implementing Regulation (EU) No. 2026/1291 (as per **Attachments 3 and 4** of this Procedure).

The fact that the Register is in an e-version format, guarantees that all information therein contained is kept confidential. This also guarantees that access to the Register is always limited to people who have been clearly identified beforehand, and who need to access said Register, due to their role and work.

7.2 Structure and Content of the Relevant Information Register

Keeping the Relevant Information Register involves the sole opening of the Occasional Sections, and shall follow, as far as they can be applied, the same criteria and methods used for keeping the Inside Information Register.

7.3 Register Entry

Registers shall include the subjects who, due to their functions, have access to Relevant and/or Inside Information, both continuously and occasionally.

INSIDER Register Permanent Section

The Permanent Section of the Inside Information Register, for the purposes of this procedure, include all subjects who have continuously and permanently access to all Specific Inside Information, from the moment they are created, i.e.:

a) the CEO and relative assistants;
b) the General Managers and all related assistants;
c) the Chief Financial Officer, also as Info Room member;
d) the General Counsel, also as Info Room member;
e) the Corporate Affairs Director, even as Person in Charge of the Registers and Info Room member, and relative Collaborators, as specified in paragraph 5.5;
f) the Person in charge of Investor Relations, also as Info Room member;
g) the Director of Corporate Identity, Communication & Institutional Affairs, also as Info Room member;

h) the Audit Firm.
i) the Company's employees involved in the process of drafting and publishing the **Press Release**.

Any additional persons to be included in, or removed from, the Permanent Section of the Insider Register shall be identified by the Board of Directors or, in urgent cases, by the Chief Executive Officer, also as FGIP.

Occasional section of the SIG Register and/or INSIDER Register

Whenever Specific or Inside Information is identified, according to paragraph 6, the Person in Charge opens an *ad hoc* specific section in the related Register, as requested by the PIMF. This same section shall also include the name, personal data and contact details of those who have access to Specific Information, and the date and time when they accessed it, as stated by the PIOCF in Charge, who in any case, must not already be registered in the Permanent Section.

The Person in Charge of the Registers can register new people who he/she knows have access to a specific Relevant or Inside Information without the need of prior authorization. The registration can also occur when a person who has access to said information declares so.

The Occasional Section shall also include the following information:

- date and time when the PIMF (or the Board of Directors) confirmed the identification of the Specific Relevant/Inside Information;
- for Inside Information, date and time when the PIMF (or the Board of Directorswhere the information has been identified as Inside Information by such body)) decided with regard to an eventual activation of the delay procedure.

The entry is made as soon as there are enough elements to identify the person who has access to the Relevant/Inside Information, except when there is a need to add initially missing information.

The Registered Subjects, if not already Company employees, shall sign specific confidential information commitments, regarding the acquisition, management and filing of Relevant/Inside Information acquired while carrying out their work activities, according to what has been set in the Company's Procedures and by current Law.

If the information concerns a prolonged process carried out in more than one step (e.g. an extraordinary operation, the approval of periodic accounting situations, etc.), the Occasional Section Register normally refers to all process phases. Following the registration, the Registered Subjects are told the following by the Company (in written form):

(a) that one has been included in the relevant register (SIG Register or Inside Information Register);
(b) about related legal obligations and applicable sanctions should any Inside Information and any illicit communication of said information be made.

Registered Subjects shall attach the formal acceptance of all the information received and the data regarding the Person in Charge of the Registers, sending it by email to him/her at the following emails: *registroinsider@pec.webuildgroup.com* and *registroinsider@webuilidgroup.com* or by registered mail or handed to him/her personally.

Should the Registered Subject not confirm having been informed, he/she will, in any case, be obliged to conform to what is provided for by the Law, and to all applicable sanctions, if any Inside Information is illicitly communicated. He/she will also be subject to all contents included in this Procedure.

Personal data contained in the Registers shall be collected and processed in compliance with the applicable data protection legislation, including Italian Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018, Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) concerning the protection of natural persons with regard to the processing of personal data, as well as any measures and guidelines issued by the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), the guidelines of the European Data Protection Board (EDPB) applicable from time to time, and any other applicable laws and regulations governing the protection of personal data.

7.4 Updating of Registers

Should data of Registered Subjects be changed, or the reasons for their registration be changed, the PIOCF in Charge, for what is known to them, shall inform the Person in Charge of the Registers, so said data can be updated.

Registered Subjects can be cancelled from the Registers in these cases:

- the Inside Information has become publicly known;
- the Inside Information has lost its privileged character before communication to the public;
- the Inside Information has lost its relevant character and has not assumed the nature of Inside Information;
- the reasons for registering the data in the Permanent Register do not exist anymore, and there are, to this day, no reasons for registering this data in an Occasional Section.

The Person in Charge of the Registers, even without a prior request from the PIMFs or PIOCFs in Charge, based on the fact that Relevant Information has become Inside or shared with Press Releases, can, directly and indirectly, respectively, cancel from the SIG Register or the Inside Information Register, all subjects registered on an occasional basis, by promptly informing the Registered Subjects concerned.

To update the Inside Information Register, the *Corporate Identity, Communication and Institutional Affairs* department shall promptly send the copies of the press releases to the Person in Charge of the Registers, every time they are published through the Company's SDIR system, with the information stating the protocol number of the Press Release, and the publishing date and hour.

7.5 Keeping Registers

The data concerning the people included in the Registers and all related documentation is kept for a minimum of five years after the entry or update was made.

8 PROTECTION OF INSIDE AND RELEVANT INFORMATION. GENERAL PRINCIPLES

Webuild personnel, to guarantee that Inside and Relevant Information is kept confidential, even when created, shall follow the following general behavioral rules:

a) classify, based on the *ad hoc* procedures issued by the Company, all information, data and documents produced and acquired while carrying out one's work activity;
b) use all information, including Inside and Relevant Information and the data and documents acquired while carrying out one's work activity, exclusively for the reasons they were communicated, but not for personal use;
c) guarantee maximum cautious behavior when circulating Inside and Relevant Information, without putting confidentiality at risk, due to unproper behavior, until they have not been disclosed to the market, according to criteria included in this Procedure, the executive Procedure and current regulations;
d) provide information to third-parties only if it is necessary to carry out their activity (institutional or in favor of Webuild), and always with a prior signed confidentiality or contractual agreement, while providing the names and data to the Person on Charge of the Registers so that the relevant register can be updated[6];
e) guarantee the integrity of Inside and Relevant Information, making sure that is kept properly and that it is aligned to corporate procedures.

Events that could put Inside Information at risk, in any way (i.e. loosing documents, unintentional communication of data to third-parties) must be reported immediately to the persons in charge of the management of these types of events, to the PIOCF in Charge of one's organizational unit. The latter must then inform the CEO, the General Manager Corporate & Finance (PIMF) and the Person on Charge of the Registers.

The Directors and Statutory Auditors of Webuild must always keep all information and documents acquired while carrying out their work, confidential, and more generally, the same also applies for all discussions occurred within the closed doors of Board of Director meetings and the meetings of Committees belonging to it, and for the work carried out by Statutory Auditors.

9 PROVIDING DOCUMENTS AND RELEVANT AND INSIDE INFORMATION TO THE PUBLIC

9.1 Press Releases

Communication to the public of Inside Information occurs through Press Releases, in accordance with all current regulations, with the prior formal approval of the Chief Executive Officer, also as PIMF, or of the Board of Directors. No declaration may be in any way provided by Webuild employees before the press release's official publishing.

Press releases are published by the Corporate Identity, Communication and Institutional Affairs function as soon as possible, and in any case as soon as all prior verifications for their correctness have been carried out, except for cases where Inside Information to the public can be delayed, according to what has been set in current regulations, as specified in paragraph 10, which follows.

The obligation to disclose Inside Information to the public as soon as possible shall not apply to Inside Information relating to intermediate steps in a protracted process where such steps are connected with bringing about, or resulting in, a particular set of circumstances or a particular event. In a protracted process, only the final circumstances or event shall be disclosed to the public as soon as possible after they have occurred[7]. It is understood that Webuild shall ensure the confidentiality of such information and that, where the confidentiality of Inside Information relating to intermediate steps in a protracted process can no longer be ensured, Webuild shall disclose such Inside Information to the public as soon as possible.

The Sharing of Inside Information shall be done by complying with the following criteria: completeness, timeliness, transparency, adequacy and continuity, avoiding any discrepancies between the information between investors, or the determination of situations that could in any case alter the performance of listed shares and in ways that allow rapid access and a complete, correct and prompt assessment of the information by the public.

All press releases concerning Inside Information, according to the indications provided by the PIMF, shall be shared by the Corporate Identity, Communication and Institutional Affairs function through the SDIR system, and published on the Company's internet site, where they will be available for at least 5 years from when they were published.

The Company shall not combine Inside Information with marketing activities.

9.2 Meetings with the Financial Community

[6] By way of example, it concerns: a) consultants of the Webuild Group and the other subjects involved in examining the topics subject to consultancy; b) the subjects with whom the Webuild Group is working on commercial or financial activities; c) public integrity boards of the sector; d) banks for matters related to Credit lines; e) rating agencies; f) market management firms where financial instruments are listed.

[7] For these purposes, reference shall be made to Annex I to Regulation (EU) 2026/789, which sets out a non-exhaustive list of final events or final circumstances in protracted processes referred to in Article 17(12)(a) of Regulation (EU) No 596/2014.

To safeguard equal information rights between different market operators, and without compromising current legal obligations, should there be meetings with financial analysts and market operators, the Company shall not provide any Inside Information to meeting participants, if these have not been first communicated to the public through means stated at point 9.1.

9.3 Company Website

Webuild has its own website (www.webuildgroup.com), where all regulatory information concerning its activities is published and made available, therefore providing information to the market, according to what is requested by Law and applicable regulations, and with particular regard to:

- corporate and governance documents (including policies and procedures subject to publication) and further documents of a regulatory nature;
- periodic financial statements;
- documents provided at meetings with market operators;
- press releases and market notices.

To provide correct information to investors, with regard to what has been published, the Company shall use the following precautions:

- data and news must be published according to adequate editing criteria, which must take into concern the specifics of processed information and the real informative function to the public, avoiding, in particular, any promotional reasons;
- all internet pages shall always state the date and time of when the information was updated;
- prepares all documents to be published externally in two languages (Italian and English), to guarantee that information is complete and uniform, guaranteeing that the English Version is aligned as regards content to the Italian one, while also highlighting, should this not be the case, any differences;
- should any errors be found after publishing information on the website, it shall promptly publish a text highlighting the corrections made;
- it always states the source information, for data and news published by third parties;
- the press release also includes reference to eventual related documents concerning the press release matter also published on the website;
- it shall make documents (preferably in unabridged form) available to the public on the Internet, also guaranteeing that any eventual summaries always include the meaning of the original complete document;
- it shall state, for documents published on the website, if they are unabridged versions or an abstract or summary, always explaining how the original document can be obtained;
- should users be linked to other sites, it shall always guarantee that this is carried out through principles of correctness and neutrality, so as to allow users to easily know which site they are currently viewing;
- it shall state the source and when the data relating to shares and exchanged volumes of financial instruments was actually detected;
- it shall allow free consultation of the site, avoiding, even if the web pages are managed by third parties, limiting access to investors in any way with regard to preventive data and news;
- in discussion forums with investors it shall use the maximum prudence during interventions to avoid altering equalness of information.

10 PROCEDURE FOR USING THE DELAY OPTION WHEN PROVIDING PRIVILEDGED INFORMATION TO THE PUBLIC

10.1 Conditions that Activate the delay procedure

Pursuant to Art. 17, par. 4, of the MAR Regulation, Webuild can delay, under its responsibility, sending communication to Inside Information to the public, if these conditions are met:

a) immediate disclosure is likely to prejudice the legitimate interests of Webuild;
b) the information is not contrary to the issuer's latest public announcement or other public communication concerning the same matter[8];

[8] For these purposes, reference shall be made to Annex II to Regulation (EU) 2026/789, containing the non-exhaustive list of situations in which inside information is contrary to the latest information disclosed to the public or to any other communication referred to in Article 17(12)(b) of Regulation (EU) No 596/2014.

c) the Company is able to ensure the confidentiality of that information.

Notwithstanding the foregoing, Webuild generally considers the pendency of the final decision concerning the event constituting the Inside Information, whether in the form of execution, approval or verification by the body competent pursuant to applicable law, the Articles of Association, shareholders' or board delegations, or the Company's organisational and self-regulatory rules, to constitute a legitimate interest capable of justifying a delay in disclosure.

Webuild's decision not to disclose Inside Information relating to intermediate steps in a protracted process shall not be subject to the delayed disclosure requirements provided for in this Section.

10.2 Rightful Interests

With regard to "legitimate interests", as stated in the previous letter a), the MAR Regulation[9] states that *"for the purposes of applying the requirements relating to public disclosure of inside information and delaying such public disclosure, as provided for in this Regulation, legitimate interests may, in particular, relate to the following non-exhaustive circumstances::*

- *ongoing negotiations, or related elements, where the outcome or normal pattern of those negotiations would be likely to be affected by public disclosure. In particular, in the event that the financial viability of the issuer is in grave and imminent danger, although not within the scope of the applicable insolvency law, public disclosure of information may be delayed for a limited period where such a public disclosure would seriously jeopardise the interest of existing and potential shareholders by undermining the conclusion of specific negotiations designed to ensure the long-term financial recovery of the issuer;*
- *decisions taken or contracts made by the management body of an issuer which need the approval of another body of the issuer in order to become effective, where the organisation of such an issuer requires the separation between those bodies, provided that public disclosure of the information before such approval, together with the simultaneous announcement that the approval remains pending, would jeopardise the correct assessment of the information by the public".*

As stated in the definition of Inside Information, should a particular circumstance (or future event) need a prolonged process to be fulfilled, said future circumstance or event, and the intermediate phases of this process connected to the fulfilling or determination of the circumstance or future event, can be considered information of a precise nature, and originate a Inside Information if, besides the characteristic precision, there are also the other three typical characteristics of a Inside Information.

Without prejudice to the foregoing, and by way of example only, the Company may consider the following circumstances, in addition to those identified by ESMA in its Guidelines on delayed disclosure, as legitimate interests capable of justifying a delay in the disclosure of Inside Information to the public: (i) in the context of ongoing negotiations, the need to obtain clarifications or additional information from one or more counterparties; (ii) in relation to the award or execution of contracts for new orders, the need to ascertain, including with the client and/or any other successful bidding partners, whether any impediments exist to the immediate disclosure of the relevant information; and (iii) the need to complete appropriate reviews with legal, financial, accounting or other professional advisers.

10.3 Activating the delay procedure

After having consulted the Info Room, the existence of the conditions for using the delay procedure shall be assessed by the PIMF or by the Board of Directors, if timeliness for action is safeguarded.

The decision is formalized with indication of the following information:

a) the motivation for activating the delay procedure;
b) the date and hour when the information is deemed to be shared;
c) the identity of the people who made the decisions or participated to their formation.

Information regarding the use of the delay procedure shall be sent by the PIMF:

- to the Person in Charge of the Register, for the purpose of recording and formalising the activation of the delay in the Inside Information Register;
- to the PIOCF in Charge, so that information safeguarding measures can be promptly adopted;
- to the *Corporate Identity, Communication and Institutional Affairs* function for all pertinent matters.

[9] Please see *Considerando* n. 50 of the MAR Regulation.

When communication of Inside Information is delayed according to what has been set in this paragraph, and confidentiality of Inside Information cannot be guaranteed any more, Webuild shall promptly communicate the Inside Information to the public.

If Webuild has delayed its communication of Inside Information to the public pursuant to this paragraph it will give to the Consob authority information about the delay procedure adopted (even using, for this communication, the format of Attachment 5).

11 SANCTIONS

Violation of this procedure is a violation of the Organization, Management and Control Model ex Legislative Decree. 231/01 of Webuild, and therefore, if the violation is confirmed, Webuild shall apply the sanctioning system due in these cases.

Moreover, conduct qualified a:

- ”insider dealing” pursuant to Article 8 of the MAR Regulation;
- unlawful disclosure of inside information pursuant to Article 10 of the MAR regulation;
- “market manipulation”, pursuant to Article 12 of the MAR Regulation;

is a criminal and administrative offense, with no limitation.

Should these behaviors be also carried out in the interest or to benefit Webuild, besides the dispositions set in the Consolidated Financial Act (TUF), they are also capable of making Webuild also administratively responsible, pursuant to Legislative Decree 231/2001. In these circumstances, if the Company is sanctioned administratively, pursuant to Legislative Decree 231/2001 and/or to the Consolidated Financial Act, it shall act with recourse against the people responsible for the violations.

12 AMENDMENTS AND INTEGRATIONS

The Company shall monitor the enactment, effectiveness and adequacy of this Procedure, so that it can eventually update it.
This Procedure shall be updated by the Company's Board of Directors, considering how regulations change and evolve in time, as well as actual experience and market practices, which will gradually evolve, with the only exception of the updates to this Procedure required by new regulations or changes to internal regulations. In this case, the amendment of the document shall be carried out by the Chairman of the Board of Directors, who shall then inform the plenary Board during the first useful meeting.

13 ATTACHMENTS

Attachment 1: Managing Inside and Relevant Information Flow Chart
Attachment 2: Mapping indicative and not exhaustive of the Types of Relevant Information and main types of PIOCFs involved
Attachment 3: Model 1 contained in Annex I of Execution Regulation (EU) no. 1291/2026.
Attachment 4: Model 2 contained in Annex I of Execution Regulation (EU) no. 1291/2026.
Attachment 5: Format for informing Consob about the delay procedure.

ATTACHMENT 1 – MANAGING INSIDE AND RELEVANT INFORMATION FLOW CHART

[OMISSIS]

ATTACHMENT 2 –INDICATIVE AND NOT EXHAUSTIVE MAPPING OF THE TYPE OF RELEVANT INFORMATION AND THE PIOCF INVOLVED

[OMISSIS]

ATTACHMENT 3
MODEL 1 OF EXECUTION REGULATION (EU) NO. 1291/2026

Template for the insider lists referred to in Article 1(1) and Article 2(2), first subparagraph

Description of the specific piece of inside information to which this section relates to:
Date and time of creation of this section (i.e. when the specific piece of inside information was identified): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]
Date and time of the last update of this section: [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]
Date of transmission to the competent authority: [yyyy-mm-dd

First name(s) of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provide	**Surname(s) of the insider (in the case of thirdparty service providers, the surname(s) of the natural person acting as a contact person for that third-party service provide**	**Professional telephone number(s) (work direct telephone line and work mobile numbers)**	**Function and reason for being insider**	**Obtained (the date and time when the insider obtained access to the specific piece of inside informatio**	**eased (the date and time when the insider ceased to have access to the specific piece of inside information)**	**National Identification Number (if applicable) or otherwise Date of Birth**
[text]	[text]	[Numbers (no space)]	[Text describing role, function and reason for being on this list, including the company name and address in the case of third-party service providers]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	Number and/or text or yyyy-mm-dd for the date of birth]

ATTACHEMENT 4
MODEL 2 OF ATTACHMENT 1 OF EXECUTION REGULATION (EU) NO. 1291/2026

Section of the permanent accesses of the list of people with access to Inside information
Date and hour of creation of the section with permanent access [yyyy-mm-dd, hh:mm UTC (universal time coordinated)]
Date and hour last update of the Section of the permanent accesses): [yyyy-mm-dd, hh:mm UTC (universal time coordinated)]
Date of communication to the competent authorities: [yyyy-mm-dd]

First name(s) of the insider (in the case of third-party service providers, the first name(s) of the natural person acting as a contact person for that third-party service provide	**Surname(s) of the insider (in the case of thirdparty service providers, the surname(s) of the natural person acting as a contact person for that third-party service provide**	**Professional telephone number(s) (work direct telephone line and work mobile numbers)**	**Function and reason for being insider**	**Obtained (the date and time when the insider obtained access to the specific piece of inside informatio**	**eased (the date and time when the insider ceased to have access to the specific piece of inside information)**	**National Identification Number (if applicable) or otherwise Date of Birth**
[text]	[text]	[Numbers (no space)]	[Text describing role, function and reason for being on this list, including the company name and address in the case of third-party service providers]	[yyyy-mm-dd, hh:mm UTC]	[yyyy-mm-dd, hh:mm UTC]	Number and/or text or yyyy-mm-dd for the date of birth]

ATTACHMENT 5: FORMAT FOR CONSOB COMMUNICATION

1	IDENTITY OF THE ISSUER		
a)	Company Name		
2	IDENTIFYING DATA OF THE NOTIFYING SUBJECT		
a)	Person(s) or body within the Company responsible for the notification to the competent authority.		
3	INFORMATION CONCERNING THE PUBLICATION OF THE INSIDE INFORMATION THAT WAS DELAYED[10]		
a)	Title of the press release		
b)	Protocol Number assigned by the SDIR [please state name of the SDIR software]		
c)	Date and hour when the press release was published		
4	IDENTIFICATION OF THE INSIDE INFORMATION		
a)	Description / Title of the Inside Information		
b)	Date and Time When the Inside Information First Existed		
5	INFORMATION CONCERNING THE DECISION TO DELAY THE INSIDE INFORMATION		
a)	Date and hour when the decision to delay the publication of the Inside Information was taken	Date	Hour

[10] This section is filled in after Market Diffusion, pursuant to Art. 17 of EU Regulation no. 596/2014, of the Document containing Inside Information.

6	IDENTITY OF THE PEOPLE RESPONSIBLE WHO TOOK THE DECISION TO DELAY THE PUBLICATION OF THE INSIDE INFORMATION TO THE PUBLIC			
	Person(s) or body within the Company responsible for the notification to the competent authority.	Name	Surname	Role
7	REASON FOR DELAYING[11]			
a)	**Please state why the communication to the public of the Inside Information subject to the delay could jeopardize the Company's rightful interest**			
b)	**Please specify the reasons supporting the assessment that the Inside Information was not inconsistent with the issuer's most recent public announcement or other public communication concerning the same matter.**			
c)	**Please state what measures were used to i) block any unauthorized access to Inside Information; ii) promptly communicate the Relevant Information to the public, if confidentiality is compromised**			

Place and date _____ , _____

_____

Signature

[11] The information set out in this section of the form shall be provided to CONSOB only upon its specific request, pursuant to Article 114(3) of the Italian Consolidated Law on Finance (Legislative Decree No. 58/1998, as amended) and Article 17(4) of Regulation (EU) No 596/2014.