# POLICY FOR MANAGING DIALOGUE WITH RELEVANT STAKEHOLDERS (OTHER THAN SHAREHOLDERS)

Approved by the Board of Directors on 11 November 2026

# 1. Definitions

In addition to the definitions contained in other articles, the terms and expressions with the first letter capitalised used in this Policy shall have the meaning given below. It is also stated that the same meaning holds regardless of whether the term is singular or plural.

**Directors**: means the members of the board of directors of De' Longhi S.p.A.

**Shareholders' Meeting**: means the meeting of shareholders of De' Longhi S.p.A.

**Shareholders**: means those persons to whom the '*Policy for managing dialogue with shareholders as a group*', adopted by the Company, applies.

**Chief Executive Officer**: means the chief executive officer of De' Longhi S.p.A.

**Code** or **Corporate Governance Code**: means the Corporate Governance Code for listed companies approved in January 2020 by the Corporate Governance Committee – set up by Borsa Italiana S.p.A., ABI, Ania, Assogestioni, Assonime and Confindustria – to which De' Longhi S.p.A. adheres.

**Board** or **Board of Directors**: means the board of directors of De' Longhi S.p.A.

**CSRD**: means Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No. 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting.

**Dialogue**: means the dialogue established by the Company with Relevant Stakeholders (as defined below), whether through its relevant departments or directly via the Board of Directors.

**External Communication Department**: means the Investor Relations and External Communication department of De' Longhi.

**Applicable Law**: means any legislative or regulatory provision, whether national, European or international, established case law, communication, recommendation, or other pronouncement by the National Commission for Companies and the Stock Exchange (CONSOB) or by the European Securities and Markets Authority (ESMA), as applicable from time to time to the matters and activities covered by this Policy, including – by way of example – the provisions, guidelines, communications, recommendations and pronouncements on preventing market abuse (including, in particular, those relating to the disclosure of Inside Information as defined by the Procedure for Disclosing Corporate Information to the Market).

**Issuer** or **De' Longhi** or **Company**: means De' Longhi S.p.A. with registered office in Via L. Seitz 47, Treviso, Italy.

**Bilateral Form**: means the manner in which the Dialogue is conducted whereby the Dialogue takes place with the participation of a single Relevant Stakeholder at any one time.

**Collective Form**: means the manner in which the Dialogue is conducted whereby the Dialogue takes place with the simultaneous participation of multiple Relevant Stakeholders.

**Group**: means the Company and its direct or indirect subsidiaries pursuant to Art. 93 of the Consolidated Law on Finance (CLF) and Art. 2359 of the Civil Code.

**Chairman**: means the chairman of the board of directors of the Company.

**One-way**: means the manner in which the Dialogue is conducted whereby only the Relevant Stakeholders express their views on specific matters.

**Procedure for Disclosing Corporate Information to the Market**: means the '*Procedure for internally managing and disclosing corporate information to the market*' adopted by the Company.

**Internal Dealing Procedure**: means the '*Procedure for fulfilling obligations regarding internal dealing*' adopted by the Company.

**Stakeholders**: means the individuals, communities or organisations that influence De' Longhi's operations or are directly or indirectly involved or affected by them, as identified annually by the Company in its sustainability reporting, in line with the double materiality approach of the CSRD.

**Relevant Stakeholders**: means the Stakeholders, other than Shareholders, identified by the Company based on the criteria specified in this Policy, with whom De' Longhi may engage in a Dialogue.

**CLF**: means Legislative Decree No. 58 of 24 February 1998 as subsequently amended (Consolidated Law on Finance).

**Two-way**: means the manner in which the Dialogue is conducted whereby an exchange of information takes place between Relevant Stakeholders and the Company.

## 2. Purpose of the Policy and General Principles

The Board of Directors of De' Longhi believes in the importance of maintaining a constant and constructive dialogue with its Relevant Stakeholders, based on listening to mutual needs. Maintaining this dialogue is fundamental to successfully pursuing its business objectives.

This interaction with the Relevant Stakeholders enables a solid bond of trust to be established, one that is cultivated by specific competent corporate functions through communication that is consistent with the principles of transparency, fairness, clarity and completeness of information, thereby ensuring alignment between the corporate strategy and the expectations of Relevant Stakeholders.

Dialogue activities with Relevant Stakeholders – without prejudice to ordinary engagement with such Stakeholders that contributes, on a regular basis, to the Company's value chain – are organised in compliance with this Policy.

The Board ensures that the Company pays particular attention to managing the Dialogue and that, to this end, each function involved in said Dialogue has the necessary means and resources to organise, manage, protect and facilitate it, in accordance with the following principles:

a) **Transparency**: the information provided to Relevant Stakeholders as part of the Dialogue with the Company shall be clear, complete, fair and true and not misleading or confusing;

b) **Timeliness**: the Company shall, through its Chief Executive Officer supported by the External Communication Department, ensure that the financial and non-financial information made available on the company website and the replies to requests for clarifications and more details submitted by Relevant Stakeholders are provided in a timely manner, which takes into account the regulations in force for listed companies and company operations;

c) **Uniformity of treatment**: the Company ensures that the Dialogue is conducted while fully respecting this Policy;

d) **Promoting the corporate purpose**: the Company works with Relevant Stakeholders to ensure that the information provided during the Dialogue is effective and representative of the corporate purpose;

e) **Compliance**: De' Longhi complies with the provisions of law and internal governance rules at all times, including in particular those provided for on the subject of market abuse by Regulation (EU) No. 596/2014 and by the relative implementing provisions and transposed by De' Longhi, including

in the '*Procedure for internally managing and disclosing corporate information to the market*', ensuring in any case that the principles of cooperation and transparency with the competent authorities, regulators and public bodies are applied.

Exchanges between Relevant Stakeholders and specific competent corporate functions concerning requests for clarification or technical information are understood to be excluded from the scope of application of the Policy.

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In order to promote the Dialogue, and in compliance with the recommendations in this regard of the Corporate Governance Code, to which the Company adheres, and of the Corporate Governance Committee in the President's letter of 18 December 2025, at the board meeting held on 11 November 2026 the Board adopted, upon the proposal of the Chief Executive Officer, this '*Policy for managing dialogue with relevant stakeholders (other than shareholders)*' (the 'Policy') which sets out the general principles, the criteria for identifying Relevant Stakeholders, the management procedures and main contents of the Dialogue between De' Longhi and its Relevant Stakeholders.

The Policy is published on the Company's website www.delonghigroup.com, section 'Governance' – 'Company Documents'.

# 3. Dialogue

### 3.1 Communication and interaction channels

De' Longhi communicates and engages with Relevant Stakeholders on an ongoing basis in a variety of ways, including but not limited to:

1. the Company website;
2. the publication of press releases and documents;
3. communication campaigns;
4. the Shareholders' Meeting;
5. the External Communication Department, as the reference department for Relevant Stakeholders;
6. social media;
7. webcasts;
8. surveys;
9. direct engagement.

### 3.2 The reference department for Relevant Stakeholders

De' Longhi supports Dialogue, thereby ensuring alignment between the corporate strategy and the expectations of Relevant Stakeholders through an open and transparent process aimed at ensuring that its Relevant Stakeholders have the opportunity to contact the Company, the Board and management.

The Company's Relevant Stakeholders may request information and/or communicate their opinions to the Board and to management by contacting:

- **the Investor Relations and External Communication Department**

Via L. Seitz 47, 31100 Treviso (Italy)

T. + 39 0422 4131

e-mail: externalcommunication@delonghigroup.com

which will then involve, where appropriate, the specific competent corporate functions for the relevant subject areas.

### 3.3 Roles involved in managing Dialogue

The **External Communication Department**, in coordination with the Chief Executive Officer, shall ensure that the appropriate requests made by Relevant Stakeholders are responded to in a timely manner, in compliance with this Policy, the Company's provisions on market abuse and the relevant regulations in force for listed companies.

The **Board of Directors** is informed of the progress and effectiveness of the Dialogue, supervising and monitoring the application of this Policy.

### 3.4 Methods for conducting Dialogue

Dialogue may take place on a '*One-way*' or '*Two-way*' basis, in particular:

a) at the request, preferably in writing, of one or more Relevant Stakeholders, which must be addressed to the External Communication Department using the contact details and methods specified in this Policy. The request should preferably indicate the topic or topics for discussion within the Dialogue;

b) at the initiative of the Company, through appropriate channels ('Invitation to Dialogue').

Dialogue requests received from Relevant Stakeholders will be monitored by the External Communication Department.

### 3.5 Criteria for evaluating requests and identifying Relevant Stakeholders

Once it has received the Dialogue requests, the External Communication Department evaluates them taking into account various factors, including in combination with one another, such as for example:

a) the information made public by the Company;

b) the previous activation of other forms of Dialogue on the same topics;

c) the potential interest of the topic to be discussed for a large number of Relevant Stakeholders, taking into account, where appropriate, the number of requests received – including those received previously – on the same topic;

d) the actual relevance of the Dialogue and its foreseeable usefulness, including from the perspective of value creation in the medium-to-long term;

e) the foreseeable approach of Relevant Stakeholders regarding the subject matters of the Dialogue.

Furthermore, in order to identify the individual Relevant Stakeholders (belonging to one or more Relevant Stakeholder categories) to be involved in the Dialogue activities, an assessment of their relevance is carried out, taking into account various factors, including in combination with one another, such as for example:

a) willingness to engage in Dialogue and to conduct a constructive and ongoing discussion;

b) reputational factors;

c) potential to influence the Company's activities and/or to be influenced by the Company's activities;

d) the size, characteristics and/or nature of the involvement with the Group;

e) any track record of activism and/or the presence of any conflicts of interest, including potential ones.

The same evaluation criteria are used in the case of an Invitation to Dialogue in order to identify which Relevant Stakeholders to contact.

### 3.6 Methods for managing Dialogue

Should it decide to accept a Dialogue request, or on the occasion of an Invitation to Dialogue, the External Communication Department – where necessary in coordination with the other competent corporate functions involved and with the Chief Executive Officer – determines the most appropriate and/or effective methods for conducting the Dialogue activity in accordance with this Policy. In particular, the following are determined:

a) the methods for conducting the Dialogue activity ('One-way' or 'Two-way', in Bilateral Form or Collective Form), any conditions for participation as well as the related timelines;

b) the representatives of the Company's management as well as any other individuals, internal or external to the Company (such as, by way of example, the Chief Executive Officer, the managers of the Company or its subsidiaries where affected by the Dialogue request, the heads of the other competent corporate functions and any external consultants) who, together with the External Communication Department, may potentially participate in the Dialogue activity, also depending on the topics covered by the request or invitation.

The External Communication Department provides the Relevant Stakeholder that made the request, or received the Invitation to Dialogue, the information requested and/or indicates the methods for conducting the Dialogue activity identified in accordance with this Policy.

All persons involved in the Dialogue activities on behalf of the Company and the Relevant Stakeholders involved shall refrain from disclosing information that qualifies as Inside Information or as Relevant Information in accordance with the '*Procedure for Disclosing Corporate Information to the Market*', as well as any information that is otherwise confidential in nature.

The External Communication Department – in coordination with the Chief Executive Officer – will inform the Chairman so that the latter may plan and monitor the information to be provided to the Board of Directors on the development and significant contents of the Dialogue, enabling the Board of Directors to carry out appropriate evaluations and considerations, and to take any necessary action.

## 4. Topics of dialogue with Relevant Stakeholders

The topics covered by the Dialogue are aimed at strengthening mutual relationships and raising the effectiveness and efficiency of governance in relations with Relevant Stakeholders depending on the category and the nature of the interests they represent, from the perspective of value creation in the medium-to-long term as a fundamental driver for achieving sustainable success. They may concern, for example, topics of relevance to the Group and the markets in which it operates, relating to the

corporate strategy, business, corporate purpose and products, including sustainability topics, and in particular environmental, social and governance (ESG) issues.

## 5. Disclosure and monitoring

A description of this Policy, as well as of the Dialogue activity conducted, the topics discussed and any initiatives undertaken by the Company following the Dialogue, will be included in the '*Report on Corporate Governance and Shareholding Structure*' prepared each year by the Company pursuant to Article 123-*bis* of Legislative Decree No. 58 of 24 February 1998.

The Chief Executive Officer, supported by the External Communication Department, is responsible for the correct application of this Policy.

It will be the responsibility of the Chairman to ensure that the Board is, in all cases, informed of the progress and significant content of the dialogue held with Relevant Stakeholders.

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