

ANTITRUST GOLDEN RULES

The Technoprobe Group, which consists of the parent company Technoprobe S.p.A. and its subsidiaries (“Technoprobe” or the “Group”) has always been committed to conduct all aspects of its business in conformity with antitrust and competition protection law, requiring the same commitment from all of its employees and individuals acting on the Group’s behalf.

In this framework, and in addition to any policy that each of the Group’s companies might adopt, in compliance with local requirements, Technoprobe intends to provide its directors, executives, employees and collaborators (the “Addressees”) a synthetic document that summarizes, in the form of some simple golden rules, the main principles of conduct, already known by the Addressees, on which Technoprobe requires the strictest compliance.

FIVE ANTITRUST GOLDEN RULES

Rule no. 1

Exchanging Sensitive Information (as defined below), particularly information about shared customers, with competitors (directly or even indirectly, such as through customers or other third parties) is prohibited.

In that regard, **Sensitive Information** includes information about the main strategic variables regarding the Group’s business, such as information that would allow an expert in the industry to predict the Group’s future actions. In general, all information that, if it related to Technoprobe, you would not wish competing companies to learn of, can be considered Sensitive Information

In any event, the following shall be considered Sensitive Information:

- prices, price lists, mark-ups or other price variables;
- discounts, margins and/or promotions, even in regard to a single customer;
- other relevant terms of sale;
- customer lists or other customer information (including technical specifications provided by a customer to produce customized products);
- intentions about the strategy to be pursued in tender or restricted proceedings (*e.g.*, interest in bidding, terms intended to be submitted, etc.);
- values and/or volumes of total or per-customer sales;
- business plans and marketing initiatives;
- manufacturing capacity and/or volumes produced;
- R&D initiatives, plans or details;
- all other information that is not in the public domain and that has commercial significance.

Rule no. 2

Pressuring employees who worked with competing companies in the past to reveal Sensitive Information and/or confidential information about those companies is prohibited.

It must be kept in mind that those individuals, although they are colleagues, are required to keep significant business information learned in previous employment relationships confidential. The

Group respects the confidential nature of information about its competitors, just as it expects that its information will be treated as such by its competitors.

Rule no. 3

If any Addressee receives Sensitive Information and/or confidential information or suspicious requests/solicitations from a competitor for any reason, even unintentionally, he or she must not respond and must not forward internally or otherwise use such information. He or she must immediately inform the Legal Function, which will take the most appropriate actions.

Rule no. 4

During meetings, industry conferences, trade association work groups or fairs and events that representatives of competing companies may attend or participate in, care must be taken with contacts and in no event may Sensitive Information be shared or discussed.

If inappropriate discussions occur or if an exchange of Sensitive Information occurs or is proposed in such contexts, Addressees must immediately leave the meeting/conference (where possible, having that departure noted in the minutes) and immediately inform the Legal Function.

Rule no. 5

The Legal Function must be consulted before participating in or contributing to initiatives aimed at gathering and disseminating detailed information about market trends (for example, to prepare reports).

DOCUMENT HISTORY

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Verified by S. Felici; approved by R. Crippa