

## **CODE OF BUSINESS CONDUCT**

Since Technoprobe was founded the business practices have been governed by full customer orientation, integrity, honesty, fair dealing and full compliance with all applicable laws.

This Code of Business Conduct, reflects RBA standards, specifies the Corporate Business Principles that assure that the working condition in the company and its supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

The nature of the Code is not meant to cover in detail all possible situations that may occur: it is designed to provide a frame of reference against which to measure any activities and which any Technoprobe's manager, employee, collaborator and supplier shall comply with.

### **OUR QUALITY**

#### **1. CUSTOMER SATISFACTION**

Product quality and customer satisfaction are cornerstones of Technoprobe's values and of its business strategies. We are committed to sustaining a high level of product's quality innovation. We will listen to our customers and strive to anticipate and fulfill their needs and expectations, by including their sustainability requirements and product content restrictions.

When making decisions related to product quality, our first consideration will be the protection of our customers through open, timely and factual disclosure to appropriate parties.

Technoprobe considers a cornerstone of its product design the full guaranty of the safety of the end users.

#### **2. QUALITY IS A CULTURE: THE QUALITY IS MADE BY THOSE WHO WORK**

Quality maintains the same meaning among all the in-house relationships: each one in the company has a customer to satisfy; each one must have in mind who is the recipient of its output; each process must be geared to this end.

Each one must measure his work: relevant facts and data shall be known (with statistical approach); we always need to identify the root causes of the defects. We do not make compromises about quality: the exemption process must be under control.

Each process owner must have a quality management system of the processes for which they are responsible: each process needs to be designed by identifying its purpose, its flow and all the recipients; by measuring it through dedicated key performance indicators; by standardizing it releasing suitable documentation and tracking tools; the involved staff must be properly trained.

Technoprobe is focused on the continuous improvement of each process.

## **OUR ETHICS**

### **3. COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

Any executive, employee and collaborator of Technoprobe shall guide his/her actions in compliance with the highest standards of professionalism, transparency, fairness and honesty, cooperating with the colleagues, superiors and subordinates, in achieving the company's mission, in compliance with the Law and with this Code of Business Conduct's provisions.

Technoprobe and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees and collaborators shall adhere to internal rules and regulations as they apply in a given situation. These internal rules are specific to the Company and may go beyond what is required by the applicable law.

### **4. CONFLICTS OF INTEREST**

A conflict of interest will exist when an employee's private interest or benefit may possibly influence his or her judgment or action. All managers and employees at all levels must devote undivided loyalty to the interests of Technoprobe and avoid any conflict between their personal interests and the interests of the Company. When potential conflicts of interest cannot be avoided, the situation must be reported to the appropriate management level, which will ensure that all decisions potentially affected by the conflict are made in the best interests of the Company.

### **5. PROHIBITION OF CORRUPT PRACTICES AND RELATIONS WITH PUBLIC ADMINISTRATIONS AND TRADE UNIONS**

Technoprobe's relations with the Public Administration and Trade Unions, as well as with its customers and third parties in general, must be inspired by the strictest observance of the applicable legal and regulatory provisions.

In this perspective:

- **it is strictly forbidden** to offer or promise, directly or through intermediaries, cash donations or concessions of goods in kind to promote the Company's activities or to defend its market positions;
- **it is strictly forbidden** to pay and/or promise, directly or indirectly, money or other benefits to third parties - public officials, public service employees, trade union representatives or private individuals - to condition or remunerate the work of their office or, in any case, to acquire preferential treatment.

Technoprobe expressly forbids any conduct aimed at circumventing the provisions of this article through the use of different forms of compensation which, in the form of duties, advice, recruitment, etc., pursue illicit purposes.

In any case, Technoprobe forbids interfering with or financing Trade Unions or organizations with which a conflict of interest could arise.

Gifts or other forms of hospitality in favour of public officials or trade union representatives are allowed only if they are of modest value and in any case such as not to prejudice the integrity of one of the parties and not to be intended as consideration for obtaining advantages in an improper manner. Such expenses, only if necessary, must always be properly documented and authorized by the competent manager.

Bribes or payments of a similar nature are never allowed, whether intended for officials of the Public Administration, Trade Unions or for customers, investors or other private counterparties. Similarly, managers, contractors, employees and suppliers of Technoprobe are forbidden to offer, demand or accept such rewards.

All addressees of this Code of Conduct are obliged to cooperate loyally with representatives of the Judicial Authority and with any other investigative/inspection/supervisory body, providing all the documentation and information requested by them in a complete, adequate and timely manner. It is strictly forbidden to behave in any way that could obstruct the proper functioning of Justice. With regard to this point, it is particularly forbidden to make false statements to the Judicial Authority and/or to any other investigative/inspection/supervisory body or to behave in such a way as to induce others to make false or misleading statements in the interest or to the advantage of Technoprobe.

## **6. CONFIDENTIAL INFORMATION**

Confidential information consists of any information that is not or not yet public information. It includes intellectual proprietary rights, trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, designs, databases, records, salary information and any non-published financial or other data. Unless required by law or authorized by their management, employees shall not disclose confidential information or allow such disclosure. Furthermore, employees must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

Technoprobe expects that third parties have a similar interest in protecting their confidential information.

In case that third parties, such as customers, joint venture partners, suppliers, will share with Technoprobe confidential information, such information shall be treated with the same care as the confidential information of Technoprobe.

In that same spirit, employees shall protect confidential information that they have obtained in the course of their prior employment.

## **7. INSIDE INFORMATION**

Inside information consists of any information, which has not been made public, relating, directly or indirectly, to one or more issues or financial instrument of Technoprobe and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.

All addressees are required to maintain confidentiality about inside information and information that may become such, taking all appropriate precautions to ensure that their circulation is without prejudice to their confidential nature until they are disclosed to the market.

All addressees of this Code of Ethics are forbidden to:

- disclose, circulate or communicate in any manner or means such information to persons other than those in respect of whom such communication is necessary to enable the performance of the relevant functions within Technoprobe;
- use such information in order to carry out transactions concerning the financial instruments to which such information refers, or recommend or induce others to carry out such transactions, on their own behalf or on behalf of third parties, directly or indirectly or by disclosing it to third parties, and prior to its disclosure.

## **8. FAIR BUSINESS PRACTICE**

Technoprobe conducts its business on global markets in accordance with the highest ethical principles complying with the applicable competition legislation. Above all, all addressees of this Code of Conduct are required to comply strictly with the applicable antitrust rules such as forbidding price-fixing and refraining from any other kind of collusion which could negatively impact competition.

Technoprobe undertakes, for the proper development of competition, (i) not to exploit any resulting dominant position, (ii) to monitor the quality of products and services provided to customers.

All addressees of this Code of Ethics are also forbidden to:

- damage, in any way, the image of competitors and their products;
- disrupt the freedom of entities which carry out industrial or commercial activities;
- violate in any way the principles of free competition;
- defrauding or deceiving customers, competitors or Public Administrations.

Acting on the premise that the interests of business partners are best protected through fair competition, Technoprobe does not seek any unfair advantage over customers, suppliers or competitors.

Technoprobe ensures that information shared at the request of third-party organizations, or communicated to public, is true.

## **9. RESPONSIBLE SOURCING OF MINERALS**

Technoprobe is deeply concerned that the supply of tantalum, tin, tungsten, gold, cobalt may benefit or fund, directly or indirectly, armed groups that are responsible for abuses against human rights present in the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Technoprobe works diligently with the suppliers to establish the origin of the minerals that are in the products it manufactures.

In case that Technoprobe becomes aware that the supply chain will include minerals from a conflict source, the appropriate actions will be undertaken, including the reassessment of the supplier relationships.

## **10. TRANSPARENCY AND FAIRNESS IN COMPANY ACTIVITIES AND ACCOUNTING RECORDS**

Technoprobe's accounting is strictly based on the general principles of truth, accuracy, completeness, clarity and transparency of the recorded data.

Every accounting transaction must be legitimate, authorized, consistent, appropriate, recorded, traced and adequately documented, in formal and substantial compliance with the regulations and procedures in force from time to time, in order to allow its complete reconstruction at any time. To this end, each addressee of this Code of Conduct who carries out operations and/or transactions

involving sums of money, goods or other economically assessable benefits must act on specific authorization and provide, on request, the appropriate documentary support for the relevant verification.

Technoprobe ensures compliance with the principles of conduct aimed at guaranteeing (i) the integrity of the share capital, (ii) the protection of creditors and third parties who establish relations with Technoprobe, (iii) the regular performance of the market, (iv) the exercise of the functions of the public supervisory authorities and, in general, (v) the transparency and correctness of the activities conducted, both from an economic and financial perspective.

In particular, the addressees of this Code of Conduct are expressly required to:

- i. behave in a correct, transparent and collaborative manner, in compliance with the law and company procedures, in all activities aimed at preparing the financial statements, balance sheets and periodical accounts and company communications in general, in order to provide the recipients of such communications (shareholders, creditors and third parties in general) with information that is truthful and correct on the Company's economic, equity and financial situation. More precisely, in this context, **it is absolutely forbidden** to prepare, draft, transmit and/or communicate, in any way or form, inaccurate, incorrect, incomplete, deficient and/or false data and information concerning the economic and financial balance sheet of the company, or to make any omission in the preparation, drafting, transmission and/or communication of such data and/or information;
- ii. observe with the utmost diligence and rigour all the legislative provisions provided for to protect the integrity and conservation of the share capital; all this in order not to damage in any way the legitimate trust placed by creditors and third parties in general;
- iii. guarantee the correct functioning of the corporate bodies and more generally of the Company, allowing the performance of the activities of the control bodies. In this context, it is absolutely forbidden to conceal, in any way or form, documents or behave in such a way as to prevent verification and control activities.

Technoprobe carries out its activities in full compliance, both formal and substantial, with current anti-money laundering legislation, and to this end undertakes to refuse to carry out suspicious transactions from the point of view of correctness and transparency.

The addressees of this Code of Conduct are therefore required:

- to verify in advance the information available on commercial counterparties, suppliers, partners and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relations with them;
- to operate in such a way as to avoid any involvement in operations suitable, even potentially, to encourage the laundering of money from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures.

## OUR PEOPLE

### 11. PERSONAL CONTRIBUTION

Technoprobe considers its people the key to success.

Technoprobe takes care of trainings and staff participation, enhancing anyone to make an active contribution at whatever level is placed; the Company indicates "the development of the capacity of doing and the pursuit of perfection" as its high road.

Technoprobe requires to all function's responsible a proactive behavior to manage, control and improve their own process; requires identifying problems and anomalies, by seeking root causes and by proposing corrective actions; requires involving and encourage the participation of all employees.

## **12. RESPECT FOR THE INDIVIDUAL**

Technoprobe respects the personal dignity, privacy and personal rights of every employee and is committed to maintain a workplace free from coercion, discrimination and harassment. Therefore, employees are freely recruited and are required not to discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage colleagues and third parties in any kind of verbal or physical harassment based on any of the above or any other reason.

Employees personal documents are not hold by the company and no fees are required to employees for their engagement.

Our employees benefit of a written and understandable work contract that includes wage calculation and government deduction, working hours, overtime management and illness protection, according to national laws where appropriate, by means of a reminder to the applicable collective bargaining agreement; our policy permits employees to perform religious obligations.

All work is voluntary, and workers are free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.

Technoprobe do not hold any original or personal document.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the Human Resources department.

At this purpose, Technoprobe ensures the confidentiality, anonymity and protection of employee whistleblowers; a process is in place to raise any concerns without fear of retaliation.

## **13. YOUNG WORKERS**

Technoprobe prohibits any kind of child labor; this means any person under age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Young workers (under age of 18) must not perform activities that may affect adversely their health or safety, including night shift and overtime.

Wage rate for young workers must be at least the same as entry-level workers performing equal or similar tasks.

## **14. FREEDOM OF ASSOCIATION**

Technoprobe respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. All employees and/or their representatives are able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.



## **15. HUMAN RIGHTS**

Human rights reflect the inherent dignity of every human being and the standard of treatment to which each of us is entitled. Each Technoprobe employee, without exception, is expected to respect and promote human rights, based on accepted international laws and practices, such as the United Nations Declaration of Human Rights, the conventions of the International Labour Organization and the United Nations' Global Compact. All the deviations are promptly pursued.

## **16. FAIR TREATMENT**

We treat each other with respect, dignity and fairness. Each of us deserves a safe, clean and welcoming place where we can do our best work.

Different thoughts, abilities, experiences and individual characteristics make our work environment richer and lead to better business decisions. Technoprobe believes that when employees are fully engaged and empowered, they drive innovation and create solutions that benefit communities around the world.

Compensation paid to workers are compliant with all applicable laws, including minimum wages, overtime hours and legally mandated benefits; on top of this our remuneration policy envisages rewarding employees who make a significant contribution to company improvement.

Working hours do not exceed the maximum set by applicable law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations.

Workers are allowed to have at least one day off every seven days. All overtime is voluntary.

## **17. HEALTH, SAFETY AND SECURITY**

We recognize the duty to provide health and safety, security and overall physical and psychological well-being to everyone who works for Technoprobe, and on-site contractors and visitors to our premises as well.

Technoprobe requires that the addressees of this Code of Conduct scrupulously observe and ensure (including its own employees and collaborators, as regards consultants, suppliers, contractors and external collaborators of the Company) all the rules laid down by law for the protection of safety and hygiene at work, always acting in compliance with the procedures that are based on these rules.

Recognized management systems such as ISO 45001 and Guidelines on Occupational Safety and Health are used as references in preparing the Code.

Technoprobe organizations must ensure that all reasonable steps are taken to maintain the health and safety of their employees preventing risk of all workplace accidents or injuries which could damage an individual's health or capacity to do his/her job.

All the work-related health and safety risks are analyzed and reduced by defining improvement plans, that take into consideration the hierarchy of controls; work environments are monitored with respect to chemical, biological and physical agents; all employees are effectively trained according to the risk involved in their job and equipped with the required PPE. Risks for pregnant and nursing women are previously assessed, and removed or reduced, the health of all employees is regularly monitored according to law prescriptions; procedures are in place to prevent, manage, track and report occupational injury and illness.

Potential emergency events are identified and assessed, emergency plans are implemented, and all workers are trained.

## **18. PRIVACY OF PERSONAL INFORMATION**

Technoprobe respects the confidentiality of personal data, in both paper and electronic form. This information may not be used or disclosed improperly or used by someone who is not authorized to do so. Information relating to employees or to business partners, must be acquired ethically and lawfully; it must be used only for the purpose allowed by law. Technoprobe organizations must take the necessary steps to protect the confidentiality of such information and observes the requirements of laws and regulations regarding privacy and information security when they collect, store, process, transmit and share personal information.

## **OUR RESPONSABILITIES**

### **19. ORGANIZATION AND PROCESS MANAGEMENT**

Technoprobe continuously reviews its organization and processes with respect to quality, health and safety, environment, labor and ethics elements to strengthen its management system, by identifying indicators to monitor the same processes. The employees are trained on the matter; periodical audits assure the compliance with the provided standards by defining corrective actions when required. The Top Management regularly reviews the status of the processes during dedicated meetings with the relevant company functions and defines improvement objectives.

A process is in place to communicate performances among stakeholders: Top Management, employees and partners in the business.

### **20. BUSINESS PARTNERS**

In all our commercial relationships with customers, suppliers and other business partners we will develop mutually beneficial partnerships in a way that supports our obligations to shareholders while allowing us to fulfil the long-term expectations of our other stakeholders.

Technoprobe, in its purchasing policies, aims to procure products and/or services by selecting suppliers on the basis of objective assessments of quality, price and according to the highest standards of compliance by the supplier with applicable regulations and ethical standards referred to in this Code of Conduct.

Technoprobe is also committed to suppliers and sub-suppliers non-discrimination on the basis of their Diversity, meaning their race, colour, gender, nationality, descent, disability, status of veteran, gender expression, gender identity and sexual orientation.

Where a supplier can be identified as Diverse on the basis of the above mentioned features, Technoprobe will encourage its inclusion in Technoprobe's supply chain. Agreements with suppliers must always be drawn up in writing and in the form prescribed by company procedures and the remuneration to be paid must be exclusively commensurate with the quantity and quality of the supply supplied.

Therefore, Technoprobe's personnel are obliged to:

- respect the internal procedures for the selection and management of relations with suppliers;



- not obstruct any supplier in possession of the requisites required from competing for the award of a supply, adopting objective evaluation criteria in the selection, according to declared and transparent procedures;
- comply with the conditions set out in the contract.

## **21. ENVIRONMENT**

Technoprobe believes that being accountable means conducting our business in a manner that respects, protects and improves the environment. We conduct our activities in an environmentally responsible and sustainable manner: we monitor the use of energy, water and greenhouse gas emissions, we use them wisely and efficiently; we responsibly dispose solid waste and we control and treat wastewater and air emissions; ozone-depleting substances are managed in accordance with the Montreal Protocol and applicable regulations; hazardous chemicals are identified, labelled and managed in compliance with safety standards; we employ all the suitable technologies to minimize any risk of environmental impact.

Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) are used as references in preparing the Code.

All required environmental permits are obtained and maintained and their operational and reporting requirements are followed. Employees whose work affects environmental compliance must be completely familiar with the permits, laws and regulations that apply to their work and the material in use.

These beliefs, along with our steadfast commitment to comply with all applicable environmental laws and regulations, comprise our ethics commitment.

## **22. GOVERNMENTS AND COMMUNITIES**

Technoprobe organizations will develop healthy relationships with local governments and communities to establish trust as well as to protect our reputation and support balanced decision-making; our Company has an important role in promoting responsible business practices based on integrity, trust and openness.

We will respect local cultures and customs and, whenever practicable, we will facilitate their integration into Technoprobe businesses. Moreover, we are aware of the importance of the Company for the local communities, which results in the participation in charity projects.

## **23. METHOD OF IMPLEMENTING THE CODE**

This Code is disseminated as widely as possible by means of special communication activities between all internal and external parties, including future employees and collaborators, working for Technoprobe.

The application of and compliance with the provisions of the Code is periodically verified by the competent company functions.

Every Technoprobe representative, employee, collaborator or consultant is required to immediately report any situation of which he or she is aware when there is evidence of a violation, or could even lead to the presumption of such a violation, of one or more of the rules contained in the Code, through the channels made available by the company and duly made known to the recipients.

If an employee or collaborator reports a violation in good faith, he or she will be protected from any retaliation. Otherwise, any statement made in bad faith will be treated as a disciplinary offence.

## **DOCUMENT HISTORY**

Revision 1.0 – Released October 2015

Verified and approved by R. Crippa

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Revision 5.0 – Released March 2021

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Revision 06 – Released September 2022

Verified by S. Felici, approved by BoD

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Verified by S. Felici, approved by R. Crippa