

# GLOBAL TRAVEL & EXPENSES POLICY

## I. INTRODUCTION

Technoprobe S.p.A. and its Affiliates<sup>1</sup> (collectively, "**Technoprobe**," or the "**Group**") are committed to conducting all aspects of their business fairly and in compliance with the highest legal and ethical standards. In accordance with this commitment, Technoprobe has adopted this Travel & Expenses Policy (the "Policy"), which is applicable to all directors, officers and employees of the Group. Some companies within the Group may have or will develop and implement their own SOPs aimed at providing specific guidance on day-by-day activities, within the framework guidelines provided by this Group Policy.

Technoprobe adopted this Policy with the purpose of defining how expenses reimbursement and travel should be handled. In particular, with this Policy the Group intends to ensure that the process is conducted in a transparent and documentable manner and is based on non-arbitrary and objective criteria.

## II. SCOPE OF APPLICATION

The Policy is applicable to all directors, officers and employees of all the companies within Technoprobe Group (the Addressees) and aims at regulating the management of business trips, reimbursement of expenses provided by Technoprobe to its employees, defining roles and responsibilities of those involved, in accordance with Group Policies and applicable regulations.

## III. GENERAL PRINCIPLES

All Addressees must conduct their activities in full compliance with this Policy and any local SOP.

Reimbursement of expenses can only be processed if appropriate justification and proof of expenses is provided, upon authorization by Group personnel with appropriate powers.

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<sup>1</sup> The term "Affiliates" includes any corporation, partnership, or other entity that, directly or indirectly, owns, is owned by, or is under common ownership with Technoprobe S.p.A., for so long as such ownership exists. For the purpose of foregoing "own", "owned", "ownership" shall mean ownership of more than fifty (50%) of the stock or other equity interests entitled to vote for the election of directors or an equivalent governing body.

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Addressees shall not incur in any expense, and consequently require any reimbursement, made for the purpose of:

- Influence the judgement or conduct of any person, in particular of public officials;
- Improperly gaining or retaining business activities.

**Addressees shall preferably choose category of expenses that imply less costs for the company.**

#### **IV. RESPONSIBILITIES**

*Addressees:* The Addressees have the responsibility to stay within the spending limits provided by their local SOP and to report any expenditures to the person intended to approve it through a traceable channel.

An employee who signs untrue statements regarding expense reimbursement or business trips completed, the start and end time of the business trip and the kilometres travelled shall be liable for all effects, including disciplinary effects, of the false statements made.

*Approver:* The Approver has the responsibility for approving business trips of the relevant Addressee and the duty to supervise the activities performed by his or her staff, including those on travel. As a general statement, with no prejudice to any more detailed provision included in local SOPs, the Approver is (i) the Head of Function for Employees operating at Headquarters; (ii) the Group CEO for expenses carried out by Head of Functions and by Affiliates' General Managers (iii) the Affiliate's General Manager for expenses carried out by Addressees operating at local Affiliates.

*HR/Competent Local Function:* The HR department for expenses carried out by Addressees at Headquarters and or the competent local function for expenses incurred by Addressees at local Affiliates level, reviews the authorized expenses in order to check the appropriateness of the expenses with the type of travel, prepares the appropriate documentation also for tax purposes and takes care of delivering the relevant reimbursement, in coordination with the Administration department.

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## V. DESCRIPTION OF ACTIVITIES

### A. Advance Authorizations

Business trips exceeding 200km should be authorized in advance. The request for authorization shall be made in writing and approved by the Approver.

If an Addressee intends to incur expenses to the advantage of a third party (e.g., customer, supplier...) for hospitality and entertainment reasons, he/she shall get authorization in advance from the Approver, even if no business trip over 200km is involved.

In line with requirements set by Global Anti-Corruption Policy, Attendees must obtain advance authorization from Group CEO for any meals, entertainment, hospitality, travel, or lodging provided to any Government Official in a business setting, regardless of value.

### B. Reservations

All reservations should be made by HR or the competent local function. Direct purchase of tickets and bookings is possible only in exceptional cases, with prior authorization from the Approver, and the relevant documentation must be made available when compiling expense reports.

### C. Means of transportation

*Cars.* The Group policy is that travel should preferably be made by company vehicles. Private cars, owned by Employees or in their legitimate possession, are considered extraordinary means of transportation.

*Airplane/Train.* travel solutions are chosen within value limits set by local SOPs. If no appropriate solutions are available within such value limits, the Addressee shall request in writing an authorization to exceed such limits to the Approver.

### D. Lodging

Lodging solutions are chosen within value limits set by local SOPs. If no appropriate solutions are available within such value limits, the Addressee shall request in writing an authorization to exceed such limits to the Approver.

### E. Meals in the framework of travelling

If a business travel is made through a period of time where normally a meal is included, the reimbursement of the relevant expense may be requested.

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Expenses shall always be documented by appropriate receipts/tax documents and shall stay within the value limits set by local SOPs.

## **F. Expenses incurred to the benefit of third parties**

All expenses incurred to the benefit of third parties shall strictly comply with requirements set by Global Anti-Corruption Policy.

In case of meals involving third parties it is always mandatory to indicate, when requesting reimbursement, the name of the third party involved, the role, the name of the company in which he/she is employed and the business reason underlying the business meal.

Expense for meals involving Government Officials shall be approved by Group CEO.

## **G. Corporate credit cards and anticipations**

If the Addressee is not provided with a corporate credit card, he/she anticipates the relevant expenses and seeks reimbursement afterwards. In case of business travels exceeding 5 days, Addressees are entitled to seek anticipation of an amount equal to the amount of expenses that are envisaged during the travel.

## **H. Reimbursement**

Expenses reports shall always provide as an attachment the original documents giving evidence of the relevant expense (receipts, invoices, other tax documents) and shall indicate at least:

- Date and place of the expense;
- Business reason behind the expense;
- Number of third parties involved (if applicable), along with name of the relevant third parties involved, role, the name of the company in which they are employed;
- Ind of expense,
- Amount.

Expense reports shall be approved by the Approver before being delivered to HR department (for expenses carried out by Addressees at Headquarters) or to the competent local function (for expenses incurred by Addressees at local Affiliates level) for reimbursement.

HR department (for expenses carried out by Addressees at Headquarters) or the competent local function (for expenses incurred by Addressees at local Affiliates level) shall check that:

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- All proofs of expense are present;
- Expenses for which reimbursement is sought are in line with the relevant proofs of expense;
- Approval by Approver was delivered.

Non-documented expenses exceeding EUR 50.00 are not reimbursable notwithstanding any relevant authorization.

## **DOCUMENT HISTORY**

Revision 1.0 – Released on December 06, 2022

approved by BoD of Technoprobe SpA on December 06, 2022