

GLOBAL WHISTLEBLOWING POLICY

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I. INTRODUCTION AND PURPOSE

Technoprobe S.p.A. and its Affiliates ("**Technoprobe**" or the "**Group**") intend to promote a corporate culture characterised by virtuous behaviour and a Corporate Governance system that prevents commission of wrongful acts, while guaranteeing a work environment in which employees can serenely report any unlawful behaviour, enabling a virtuous path of transparency and compliance with adequate ethical standards. For this reason, Technoprobe recognises the importance of adopting a specific procedure governing the reporting of unlawful conduct by employees.

The purpose of this policy is to define appropriate communication channels for receipt, analysis and processing of reports of possible unlawful conduct within Technoprobe.

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Technoprobe **prohibits and condemns any act of retaliation or discrimination, direct or indirect, against anyone who reports potential unlawful conduct**, for reasons directly or indirectly related to such report, providing for appropriate sanctions, within the disciplinary system, against those who violate the measures of whistle-blower's protection. At the same time, Technoprobe commits to apply appropriate sanctions against those who, with wilful misconduct or gross negligence, submit reports that turn out to be unfounded.

II. ADDRESSEES AND CORPORATE FUNCTIONS INVOLVED

This procedure applies to all employees and independent collaborators of Technoprobe, to the members of the corporate bodies and to all those who, although external to Technoprobe, work directly or indirectly on its behalf (e.g., agents, distributors, business partners, etc.) (the "**Addressees**").

The Legal Function of the Parent Company is responsible for collecting the reports and carrying out the preliminary examination thereof, while ensuring the anonymity and confidentiality of any information concerning the whistle-blower, in order to safeguard him from potential retaliatory acts of any kind, if necessary with the support of external legal advisors, and ensuring adequate information flows to the Parent Company's Supervisory Board as the top management of the compliance system. The Legal Function of the Parent Company is also responsible for reporting to its Board of Directors.

III. OBJECT OF REPORTS

Addressees should report actions and conducts that:

- are not in line with Technoprobe's values, Code of Ethics and compliance procedures;
- do not comply with the laws in force;
- could significantly damage the interests of Technoprobe and the Group companies.

The report shall be sufficiently circumstantiated and provide the following information, together with any supporting documentation:

- Personal details of the whistle-blower;
- Clear and complete description of the conduct, including omission, underlying the report;
- Circumstances of time and place in which the reported facts were committed and the related conduct;

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- Subjects involved, corporate structures/organizational units involved;
- Any third parties involved or potentially damaged;
- Any other information that may prove useful in establishing the reported facts.

Reports provided for the mere purpose of retaliation or intimidation or unfounded reports made with wilful misconduct or gross negligence shall be sanctioned. In particular, sending of any communication that proves to be unfounded on the basis of objective elements and that is, again, on the basis of objective elements, made for the sole purpose of causing unjust damage to the reported person shall be sanctioned.

Technoprobe guarantees the utmost **confidentiality** regarding the persons and facts reported, using, to this end, criteria and communication methods suitable to protect the identity and integrity of the whistle-blowers and persons mentioned in the reports (see paragraph 4 below), so that the person making the report is not subject to any form of retaliation, avoiding in any case the communication of data to third parties who are not involved in the report management process regulated by this procedure.

Bona fide whistle-blowers shall be protected against any form of retaliation, discrimination or penalisation.

For what concerns **anonymous reports**, they limit Technoprobe's ability to carry out an effective verification of the reported information, as it is impossible to establish a smooth information channel with the whistle-blower. Therefore, they shall only be taken into account if adequately substantiated and detailed and concerning potential wrongdoings or irregularities deemed serious. Relevant factors for assessing anonymous reporting include the credibility of the presented facts and the possibility of verifying the truthfulness of the information about the breach on the basis of reliable sources.

IV. MODALITIES OF REPORTING

The report shall be submitted:

1. to the **e-mail** address whistleblowing@technoprobe.com, indicating in CC the Supervisory Board of the Parent Company;
2. by **ordinary mail** to the address of Via Cavalieri di Vittorio Veneto n. 2, Cernusco Lombardone (LC), marked "*private and confidential*", to the attention of the Legal Function.

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In case of a report made using channel no. 1 does not CC the Supervisory Board of the Parent Company, the Legal Function shall forward the report to the Supervisory Board of the Parent Company without delay.

Any Addressee who receives a report not using the above-mentioned institutional communication channels shall promptly deliver its original with any attachments:

- if in paper form, to the Head of Technoprobe Legal Function;
- if in electronic form, to the e-mail address whistleblowing@technoprobe.com

In the event of a report received orally, each addressee shall promptly notify the Legal Function of the Parent Company in writing, using one of the institutional channels indicated above.

V. VERIFICATION OF REPORTS

As soon as a report is received, the Legal Function of the parent company preliminarily verifies the report is relevant and *prima facie* founded, possibly with the help of an external legal counsel bound to confidentiality on the activities carried out.

If the report comes from the Parent Company, the Supervisory Board registers the report by means of an identification code/name, ensuring the traceability and correct archiving of the documentation also in the subsequent stages and informs the Parent Company's Legal Function whether it intends to handle the assessment phase directly or whether it intends to outsource it to the Legal Function itself, receiving periodic updates on the same.

Within 7 days of receipt of a report, the Parent Company's Legal Function (or the Supervisory Board in case of reports from the Parent Company) provides feedback to the whistle-blower as to whether the report has been admitted for examination. Within three months, feedback shall be provided to the whistle-blower on the outcome of the report investigation.

The Parent Company's Legal Function (or the Supervisory Board in case of reports from the Parent Company) classifies reports into:

- **Irrelevant reports:** in this case, it shall inform the whistle-blower accordingly and close the report;
- **Reports made in bad faith:** the report is forwarded to the competent Head of HR for it to consider whether to commence any disciplinary procedure;

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- **Substantiated reports:** should it be deemed that there is sufficient evidence of potentially unlawful conduct such as to allow for an investigation to be initiated, the investigation phase is initiated.

The investigation phase takes the form of carrying out targeted checks on the reports, enabling the identification, analysis and evaluation of the elements confirming the reliability of the reported facts.

At that stage, the Parent Company's Legal Function (or the Supervisory Board in case of reports from the Parent Company) may decide to engage, if necessary, additional internal support figures and Company Functions identified depending on the subject of the report, as well as the external professionals.

The person/Function in charge of conducting the verification:

- shall ensure that it is carried out in a fair and impartial manner; this implies that each person involved in the investigation must be informed - once the preliminary investigation has been completed - of the statements made and the evidence obtained against them and that they must be in a position to counter them;
- may engage technical advisors (such as external professionals or in-house specialists of the Group) on matters that do not fall within their specific competence.

Information gathered in the course of the verification shall be handled with due discretion and restricted to the verification group.

Upon completion of the verification, it should be issued a report that:

- summarizes the course of investigation;
- sets out the conclusions reached and provides any supporting documentation;
- provides recommendations and suggests actions to be taken to remedy the detected breaches and to ensure that they do not occur in the future;
- is addressed to the Board of Directors of the Parent Company.

VI. OUTCOME OF THE INVESTIGATION

The investigation phase can be concluded with:

- a) **negative outcome:** in which case the report is dismissed;

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- b) **positive outcome:** in which case, the Parent Company's Legal Function (or the Supervisory Board in case of reports from the Parent Company) shall send the outcome of the verifications conducted to the Parent Company's Board of Directors and HR management, in order to enable Technoprobe to take the necessary countermeasures and adopt any disciplinary sanctions.

The Board of Directors of the Parent Company shall forward the report to the BoD of the Group company to which the relevant person belongs.

VII. ARCHIVING

The documentation used in the performance of the activities (including in the case of irrelevant reports) shall be kept in a special archive.

VIII. DISCIPLINARY SYSTEM

Failure to comply with the principles and rules contained in this policy entails the application of the disciplinary system adopted by Technoprobe.

DOCUMENT HISTORY

Revision 1.0 – Released on December 06, 2022

Approved by the BoD of Technoprobe SpA on December 06, 2022