

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

GLOBAL WHISTLEBLOWING POLICY

TABLE OF CONTENT

I.	INTRODUCTION AND PURPOSE	2
II.	ADDRESSEES AND CORPORATE FUNCTIONS INVOLVED	3
III.	PROCEDURE	5
	a. REPORTS.....	5
	Scope of the facts to be reported.....	5
	Content of the report.....	7
	b. MODALITIES OF REPORTING.....	8
	c. RECIPIENTS OF REPORTS.....	9
	d. INVESTIGATION ON THE REPORTS.....	9
	e. OUTCOME OF THE INVESTIGATION	12
	f. INFORMATION FLOWS.....	12
IV.	PROTECTION AND RESPONSIBILITY OF THE WHISTLE-BLOWER.....	13
	a. CONFIDENTIALITY AND PROHIBITION OF RETALIATORY AND/OR DISCRIMINATORY ACTS	13
	b. RESPONSIBILITY OF THE WHISTLE-BLOWER	15
V.	EXTERNAL REPORTING	16
VI.	TRACEABILITY	16
VII.	DISCIPLINARY SYSTEM.....	17
VIII.	DOCUMENT HISTORY	17

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

I. INTRODUCTION AND PURPOSE

Technoprobe S.p.A. (or the “**Company**”) and its Affiliates¹ (together, “**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 malpractices and unlawful conduct by employees.

With regard to Technoprobe S.p.A., this policy forms an integral part of the Organisation, Management and Control Model pursuant to Italian Legislative Decree No. 231/2001 (the “**231 Model**”).

The purpose of this policy is to define appropriate communication channels for receipt, analysis and processing of reports of possible misconduct and unlawful conduct within Technoprobe. The identity of whistle-blowers must always be kept confidential, and whistle-blowers must not incur any liability, be it civil, criminal, administrative or employment-related for having reported in good faith possible wrongful acts through the appropriate channels.

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 willful misconduct or gross negligence, submit reports that turn out to be unfounded.

This Whistleblowing Policy has been prepared in terms of the local regulations applicable to the jurisdictions where the Company operates within the perimeter of application of Directive EU 2019/1937, where applicable.

¹ For the purpose of this Policy “Affiliate” mean 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.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

3

II. ADDRESSEES AND CORPORATE FUNCTIONS INVOLVED

This Whistleblowing Policy applies to:

- all present or former employees, present or former persons who are or were seconded to the Group, or independent collaborators of Technoprobe;
- any candidate for employment, only where information concerning improper practices has been acquired during the recruitment process or other pre-contractual negotiations;
- self-employed workers, freelancers, contractors, subcontractors, consultants, volunteers and trainees (including unpaid ones), who perform their activities at Technoprobe;
- shareholders and persons with administrative, management, control, supervisory or representative functions, as well as non-executive members of the corporate bodies, of the Company and each of its Affiliates;
- in general, all those who, although external to the Group, work directly or indirectly in its favour (e.g., suppliers of good and services) and / or on its behalf (e.g., agents, distributors, business partners, etc.);

(together, the "**Addressees**").

The protections afforded in terms of this Policy shall also apply to the Other Protected Persons as defined below.

In line with the above, this document is communicated to all the Addressees by appropriate means of communication, including emails, by the Whistleblowing Officer (as defined below) or the function/department requesting the service of an entity outside Technoprobe to which this document shall be communicated. In particular, the Whistleblowing Policy is displayed and made easily visible in workplaces, including through Company's intranet, and it is as well accessible to persons who, while not attending workplaces, have a legal relationship in one of the forms referred above. It is also published in a dedicated section of the Technoprobe Group website.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

In order that protection is afforded in terms of this Policy, the disclosure must be a protected disclosure. A protected disclosure is an internal disclosure or an external disclosure of information, made in writing or in any format prescribed in terms of this Policy ("**Protected Disclosure**").

In the event that an anonymous internal or external report is made in the manner prescribed by this Policy and subsequently the reporter is identified and suffers retaliation, the reporter may still benefit from the protection provided by this Policy and applicable law.

A disclosure is a Protected Disclosure if the whistle-blower:

- had reasonable grounds to believe that the information on breaches disclosed was true at time of the disclosure; and
- disclosed internally (in accordance with Section III of this Policy) or externally (in accordance with Section V of this Policy) or made a public disclosure.

The protections conferred by this Policy and in terms of applicable law do not apply to a whistle-blower who knowingly discloses information which he knows or ought to reasonably know is false.

In the event that a whistle-blower has made an Internal Disclosure or External Disclosure in good faith, and it transpires that the whistle-blower was mistaken about its import or that any perceived threat to the public interest on which the disclosure was based has not materialised or that the person making the disclosure has not fully respected the procedural requirements set by this Policy, such whistle-blower shall still be afforded the protections as set out in this Policy.

The Contract & Legal Affairs Officer is appointed as whistleblowing reporting officer (the "**Whistleblowing Officer**") and is therefore responsible for collecting the reports, acknowledging receipt and following up on the latter, including by and carrying out the preliminary examination thereof, while ensuring the confidentiality of any information concerning the whistle-blower, the individuals named in the report and the subject-matter of the report, in order to prevent potential retaliatory acts of any kind. The Whistleblowing Officer is also responsible for keeping the whistle-blower abreast of the progress of an internal investigation and providing feedback to the whistle-blower. The Whistleblowing Officer is also responsible for reporting to the Company's senior management as per the provisions included in this document.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

5

The Whistleblowing Officer has a direct reporting to the BoD for the purposes of its role, guaranteeing its maximum degree of independence – no reporting line whatsoever to the Head of the Legal Function nor to any other corporate function is applicable in its role as Whistleblowing Officer. The Whistleblowing Officer receives proper training and relevant refreshes with regard to the management of whistle-blowing reports, conduction of internal investigations and data privacy requirements.

The Whistleblowing Officer shall be provided annually with adequate financial and organisational resources to allow the proper carrying out the activities provided for in this policy.

III. PROCEDURE

a. REPORTS

Scope of the facts to be reported

All the Addressees are encouraged to report actions or conducts that:

- are not in line with Technoprobe's values, Code of Business Conduct and compliance procedures (including 231 Model with regard to Technoprobe S.p.A.); or
- do not comply with the laws in force in the territory of the relevant Affiliate (either at national or EU level); or
- could significantly damage the interests of Technoprobe.

The following are examples of potential facts or actions to be reported:

- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject, e.g., in the field of public procurement, financial services, consumer protection, protection of privacy and personal data; or
- the health or safety of any individual has been, is being or is likely to be endangered; or
- a corrupt practice has occurred or is likely to occur or to have occurred; or
- a criminal offence has been committed, is being committed or is likely to be committed; or

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

6

- a breach affecting the financial interests of the European Union as referred to in Article 325 of the Treaty on the Functioning of the European Union (TFEU) and further specified in relevant European Union measures has occurred or is likely to occur or to have occurred; or
- a breach relating to the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union (TFEU), including breaches of European Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate tax or to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law has occurred or is likely to occur or to have occurred; or
- information tending to show any matter falling within any of the preceding points has been, is being or is likely to be deliberately concealed.

Practical conducts / events that shall be reported:

1. Financial fraud: an employee suspects that some of his/her colleagues are engaged in fraudulent activities, such as embezzlement, money laundering, or tax evasion to the benefit of the Company.
2. Corruption: an employee witnesses or suspects bribery or other corrupt practices within their organization, involving public officials, suppliers, or clients.
3. Health and safety violations: an employee notices that their workplace does not comply with health and safety regulations, putting employees' well-being at risk.
4. Environmental misconduct: an employee becomes aware that some of his/her colleagues are engaging in practices that harm the environment, such as illegal disposal of hazardous waste or violating environmental protection laws.
5. Confidentiality misconduct: an employee witnesses a colleague or a client or supplier taking pictures or using the mobile phone in restricted company areas.

Remember that these are just a few examples, and relevant regulations (such as Italian Legislative Decree No. 24/2023) cover a broad range of misconduct that can be reported through whistleblowing channels.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

Reports must be made in a disinterested manner and in good faith: reports provided for the mere purpose of retaliation or intimidation, or ungrounded reports made with willful misconduct or gross negligence shall be sanctioned. In particular, sending of any communication that proves to be ungrounded 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.

The report shall not concern complaints, claims or demands related to an interest of a personal nature (i.e., that pertain exclusively to the individual employment relationships of the whistle-blower, or regarding the employment relationship with hierarchically superordinate figures) and, therefore, shall not be used for purely personal purposes.

Content of the report

The report shall provide the elements enabling the receiving function to carry out the necessary checks to assess whether the report is grounded.

To this end, the report shall be sufficiently circumstantiated, and, as far as possible, provide the following information, together with any supporting documentation:

- clear and complete description of the conduct (that may also concern the omission of a due activity), underlying the report;
- circumstances of time and place in which the reported facts were committed and the related conduct;
- personal details or other elements (e.g., position held, relevant Function/Area) enabling the identification of the person who allegedly carried out the reported facts;
- any third parties involved or potentially damaged;
- indication of any other persons who may be able to provide information on the facts underlying the report;
- any other information that may prove to be useful in establishing the reported facts.

The identity of the whistle-blower making the Protected Disclosure, and the identity of Other Protected Persons (as defined below), shall be protected at all times and any communication in relation to the alleged or actual improper practice (including the report itself and/or any communication in this regard) shall not include the identification details, or any other details,

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

which may lead to the identification of the whistle-blower who had made the disclosure or of the Other Protected Persons. Each of the whistle-blower and Other Protected Person(s) may, separately, expressly consent in writing to the disclosure of their details.

Any reports made omitting one or more of the above-mentioned elements shall be taken into account where they are sufficiently circumstantiated to allow an effective verification and review of the reported facts, where appropriate, by means of interaction with the whistle-blower and/or the third parties indicated in the report and/or through other means.

In particular, **anonymous reports**, i.e., those lacking any element allowing for their author to be identified, are admitted where allowed by local law. However, such reports limit Technoprobe's ability to carry out an effective verification of the reported information. Therefore, they shall only be taken into account if concerning potential wrongdoings or irregularities deemed serious and if adequately substantiated and detailed. To this purpose, the Whistleblowing Officer may request further information to the anonymous whistle-blower through the communication channels provided by the online platform used for reporting and may decide to open the investigation phase only in case a sufficient degree of detail is provided. 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.

Moreover, the anonymous nature of the report, does not allow the application of the provisions of this Policy in relation to protection from retaliatory acts, since it is not possible to link the (hypothetically) retaliatory fact with the report. It is understood that if the person, initially anonymous, later reveals his or her identity, the same will enjoy the protections provided by this Policy with reference to the prohibition of retaliatory acts.

b. MODALITIES OF REPORTING

The report shall be submitted:

1. via the IT platform accessible digiting the following url: technoprobe.parrotwb.app

The recipients of the reporting are identified in par. c. below.

The modalities through which the report should be made via the IT platform are described in the attached operating procedure (see **attachment n. 1**), which is herein fully recalled.

2. in addition, at the request of the whistle-blower, the report may be made orally through an in-person meeting with the Whistleblowing Officer, that can be requested via the IT

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

platform accessible digiting the following url: technoprobe.parrotwb.app, and shall be set within a period of 45 days of the request.

Strict confidentiality of the meeting will be guaranteed.

c. RECIPIENTS OF REPORTS

The addressee of the reports is the Whistleblowing Officer, equipped with the necessary reporting management skills, also through dedicated training on the management of whistleblowing reports.

Due to its preeminent role in the Group's compliance system, the Supervisory Board (OdV) of Technoprobe S.p.A. will also be notified of the submission of any report relevant under the provisions of Technoprobe S.p.A.'s 231 Model. To this end, the Whistleblowing Officer will send a specific notification devoid of any element suitable to identify the whistle-blower or the individual(s) mentioned in the report.

In case the whistle-blower requests an in-person meeting with the Whistleblowing Officer, the latter shall inform the Supervisory Board (OdV) of the request and of the outcome of the meeting.

If the reported conduct concerns the Whistleblowing Officer, the whistle-blower may address its report (by using the dedicated channel available in the IT platform) directly to the Supervisory Body of Technoprobe S.p.A.

If the reported conduct concerns a member of the Supervisory Board (OdV) of Technoprobe S.p.A., the whistle-blower may indicate (by using the proper functionalities of the IT platform) that the report shall not be disclosed to the Supervisory Body of Technoprobe S.p.A. or to one or more of its members.

d. INVESTIGATION ON THE REPORTS

Any investigation under this Policy will be conducted as speedily as possible.

Within 7 days of receipt of a report, the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) provides feedback to the whistle-blower on the receipt of the report and the intended timetable for investigation. The Whistleblowing Officer may outline this information in a written report, or he may opt to arrange a meeting with the whistle-blower. Such meeting shall be documented by the Whistleblowing Officer.

Within 3 months of the date of the report, feedback shall be provided to the whistle-blower

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

on the outcome of the investigation, If, for objective reasons connected with the complexity of the investigation, the latter is not concluded within such timeframe, the Whistleblowing Officer will in any event provide the whistleblower with a feedback on the ongoing activities and first outcomes of the investigation, reserving to provide a further feedback when the activities will be completed. In any case, the content of such feedbacks shall not jeopardize any action taken by the Company as a consequence of the investigation and/or any pending investigation carried out by Public Authorities on the same facts.

In order to have timely visibility of the feedback, the whistleblower is required to access the platform to check the status of his/her report and to verify the timely receipt of the above-mentioned feedback, and to check for any additional requests from the Whistleblowing Officer. The Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) preliminarily verifies whether the report is relevant and *prima facie* founded, if needed with the help of an external professional consultant bound to confidentiality on the activities carried out.

As outlined above, if, from an initial analysis, the Whistleblowing Officer detects that the report concerns violations or alleged violations of the 231 Model of Technoprobe S.p.A. or the commission of relevant crimes pursuant to Legislative Decree n. 231/2001, shall promptly notify the Supervisory Board of Technoprobe S.p.A. through a specific notification outlining the 231 relevance of the report, so that the Supervisory Board can assess the opportunity of taking appropriate investigations/actions.

As part of the internal investigation conducted, the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) may request additional information and/or documentation from the whistle-blower. Whistle-blowers shall, as much as possible, cooperate to meet any reasonable request to clarify any facts and/or circumstances and to provide (additional) information. To this end, anonymous whistle-blowers shall diligently and regularly check the IT platform using their access codes, to make sure any request from the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) are timely reviewed and replied to. The lack of information or other evidence including the unwillingness of whistle-blower to cooperate with an investigation can be the reason for the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) deciding to conclude that the concern has no factual basis.

The Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) registers the report by means of an identification code/name, ensuring the traceability and correct archiving of the documentation also in the subsequent stages.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

The Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) classifies reports into:

- **Non-relevant reports:** in this case, it shall inform the whistle-blower accordingly, addressing the latter to other Company Functions (e.g. HR, Legal) to address the items raised, where appropriate, and close the report;
- **Reports made in bad faith:** if the report comes from an individual within the Group, the report is forwarded to the Head of HR for it to consider whether to commence any disciplinary procedure. If the report comes from an external entity (e.g., consultant, supplier, etc.), the latter is forwarded to the Procurement department, for it to consider any possible measure with regard to the agreement in place with such external subject;
- **Relevant reports:** if the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) considers that there is sufficient elements indicating that potentially unlawful conduct could be substantiated through an investigation activity, it starts the investigation phase.

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. The Whistleblowing Officer shall carefully evaluate the possibility to engage external professionals to assist in the investigation phase, coordinating where appropriate with the Head of Legal Function.

The Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above), where applicable in coordination with the Legal Function and external professionals, may carry out any activity deemed appropriate, including personal hearing of the whistle-blower and any other person who may provide information on the facts reported and documents/email review, in compliance with applicable data protection laws and regulations. Indeed, the person mentioned in the report may be heard, or, at his or her request, shall be heard, also by means of a paper procedure through the acquisition of written submissions and documents.

The Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above):

- shall ensure that confidentiality requirements, as set out under Chapter VI below, are fully complied with;
- shall ensure that the verification be carried out in a diligent, fair and impartial manner; this implies that each person involved in the investigation must be informed – once the

Technoprobe S.p.A. - Partita IVA e Codice Fiscale 02272540135 - Capitale Sociale € 6.010.000 - R.E.A. 283619

All rights reserved. The COPYRIGHT of this document is property of TECHNOPROBE S.p.A. No part of this document may be copied, reprinted or reproduced in any material form, whether wholly or in part, without a written consent. The contents or methods or techniques contained herein are CONFIDENTIAL, therefore must not be disclosed to any other person or company or entity.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

preliminary investigation has been completed – of the statements made and the evidence obtained against them and that they must be in a position to provide counter-arguments;

- 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 investigation, even when managed by third parties involved, shall be handled with the utmost confidentiality and restricted to the persons involved in the verification activities.

e. OUTCOME OF THE INVESTIGATION

The investigation phase may end up with:

- **a negative outcome**, in which case the report is dismissed;
- **a positive outcome**: in which case the Whistleblowing Officer (or other recipient of the report, as outlined under par. c. above) shall send the outcome of the investigation to the Board of Directors of Technoprobe S.p.A. or to the managing body of the Affiliate in which the involved person is employed, if I falls within the perimeter of application of Directive EU 2019/1937, in order to enable Technoprobe to take the necessary countermeasures and adopt any disciplinary sanctions. In particular, upon completion of the verification, a report shall be issued that:
 - a. summarises the course of the investigation;
 - b. sets out the conclusions reached and provides any supporting documentation;
 - c. provides recommendations and suggests actions to be taken in relation to the breaches detected, at disciplinary and compliance level.

Feedback shall be provided to the whistle-blower at the conclusion of the investigation ensuring that the content of such feedback does not jeopardize any actions taken by the Company as a result of the investigation and/or any ongoing investigations conducted by Public Authorities into the same facts.

f. INFORMATION FLOWS

The Whistleblower Officer provides a summary of reports received and for which an investigation has been opened, as well as a summary of reports received and deemed

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

unfounded, with an indication of the investigations carried out and the reasons why the reports were deemed unfounded:

- quarterly to the Supervisory Board of Technoprobe S.p.A.;
- semi-annually to the Board of Directors Technoprobe S.p.A. and to the individuals in charge of managing each Affiliate.

IV. PROTECTION AND RESPONSIBILITY OF THE WHISTLE-BLOWER

a. CONFIDENTIALITY AND PROHIBITION OF RETALIATORY AND/OR DISCRIMINATORY ACTS

Technoprobe guarantees the utmost **confidentiality** of the identity of the whistle-blower, the person involved, and the persons otherwise mentioned in the report, as well as of the content of the report and related documentation, using, to this end, criteria and communication methods suitable to protect the identity and integrity of the above-mentioned persons, also in order to ensure that the whistle-blower is not subject to any form of retaliation and/or discrimination, avoiding in any case the communication of data to third parties who are not involved in the report management process regulated by this procedure.

With the exception of cases where criminal or civil liability of the reporter is conceivable, the identity of the reporter shall be protected in accordance with the law.

Therefore, subject to the exceptions mentioned above, the identity of the whistle-blower may not be disclosed without their express consent to any individual not mentioned in this procedure as part of the investigation process, and all persons who receive or are involved in the handling of the report are obliged to protect the confidentiality of such information.

Breach of the confidentiality obligation gives rise to disciplinary liability, without prejudice to other forms of liability provided for by law.

In particular, in the framework of any disciplinary procedure brought against any person mentioned in the report, the identity of the whistle-blower may only be disclosed in cases where express consent of the whistle-blower is provided.

The same confidentiality requirements shall be applied also to the persons involved/mentioned in the report.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

Bona fide whistle-blowers shall be protected against any form of retaliation, discrimination or penalisation, without prejudice to any other form of protection provided for by the law.

By way of example only, the following are considered to be form of retaliation:

- termination of employment, suspension or equivalent measures;
- downgrading or non-promotion;
- change of duties, change of place of work, reduction of salary, change of working hours;
- suspension of training or any restriction of access to training;
- negative merit notes or negative references;
- the adoption of disciplinary measures or other sanction, including fines;
- intimidation, harassment or ostracism;
- discrimination or otherwise unfavorable treatment;
- the failure to convert a fixed-term employment contract into an employment contract of indefinite duration, where the employee had a legitimate expectation of such conversion;
- the non-renewal or early termination of a fixed-term employment contract;
- damage, including to a person's reputation, particularly on social media, or economic or financial harm, including loss of economic opportunities and loss of income;
- improper listing on the basis of a formal or informal sector or industry agreement, which may result in the person being unable to find employment in the sector or industry in the future;
- the early termination or cancellation of a contract for the supply of goods or services;
- the cancellation of a license or permit;
- the request to undergo psychiatric or medical examinations.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

Whistle-blowers who believe that they have been subjected to retaliatory conduct as a result of a previously made reports are encouraged to file a new report concerning the retaliation they have suffered. Moreover, they can communicate to the competent national body / authority any form of retaliation that they deemed to have suffered (see par. V below).

Acts taken in violation of the prohibition above shall be null and void. Whistle-blowers who have been fired as a result of whistleblowing have the right to be reinstated in their jobs and/or to get any protection granted by applicable local law.

As mentioned before, alongside the protection granted to the whistle-blower, the above-mentioned protective measures shall also be granted towards the below individuals/entities, referred to as "**Other Protected Persons**":

- (a) facilitators (i.e., those who assist a whistleblower in the reporting process, operating within the same work context and whose assistance must be kept confidential);
- (b) persons in the same work context as the whistle-blower who are related to him/her by a stable emotional or family relationship within the fourth degree (e.g., relatives);
- (c) co-workers of the whistle-blower who work in his/her same work context and who have a regular and current relationship with him/her;
- (d) entities owned by the whistle-blower, as well as entities operating in the same work context of the whistle-blower;
- (e) other persons as may be specified in locally applicable laws.

b. RESPONSIBILITY OF THE WHISTLE-BLOWER

As anticipated above, disciplinary sanctions may be applied to the whistle-blower making reports with malice or gross negligence, in accordance with locally applicable labor regulations. The criminal and civil liability of the whistle-blower remains unaffected.

Any forms of abuse of whistleblowing, such as manifestly opportunistic, slanderous or defamatory reports and/or made for the sole purpose of harming the reported person or other persons, as well as any other hypothesis of improper use or intentional instrumentalization of the whistleblowing channels, are also subject to disciplinary sanctions and/or liability under applicable law.

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

V. EXTERNAL REPORTING

In case the whistle-blower has:

- already made an internal report according to Section III above and it has not been followed up within the terms set in the same Section; or
- reasonable grounds to believe that if he or she made an internal report, the report would not be effectively followed up or that the same report may result in the risk of retaliation;
- reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest;

whistle-blower may make an external report ("**External Disclosure**") to the competent national body / authority set up according to local applicable law. For Italy, the competent authority is ANAC (Autorità Nazionale Anticorruzione). This is also considered to be a Protected Disclosure in terms of this Policy.

The reporting can be done in written form, through IT platforms or the other means implemented by the national body / authority, or in oral form, through telephone line and/or the recorded voice messaging system implemented by the national body / authority. The relevant national body / authority shall guarantee the utmost confidentiality of the identity of the whistle-blower, the person involved, and the person otherwise mentioned in the report, as well as the content of the report and related documentation.

VI. TRACEABILITY

The documentation used in the performance of the activities (including in the case of irrelevant reports) shall be kept by the Whistleblowing Officer (or other recipient of the report, as outlined under par. III, c above) in a special archive.

Reports and related documentation shall be retained for as long as necessary for the processing of the report, and in any case no longer than five years from the date of the communication of the final outcome of the reporting procedure, in compliance with the confidentiality obligations set forth by the relevant applicable laws.

Where a recorded telephone line or another recorded voice messaging system is used for reporting, subject to the consent of the reporting person, the Whistleblowing Officer (or other recipient of the report, as outlined under par. III, c above) may keep the report in the following ways:

Technoprobe S.p.A.

Via Cavalieri di Vittorio Veneto, 2
23870, Cernusco Lombardone (LC) - Italy
www.technoprobe.com

17

- by making a recording of the conversation in a durable and retrievable form; or
- through a complete and accurate transcript of the conversation prepared by the staff members responsible for handling the report (the whistle-blower may verify, correct or confirm the contents of the transcript by his or her own signature).

When, at the request of the whistle-blower, the report is made orally in a face-to-face meeting with the Whistleblowing Officer, the latter shall, with the consent of the reporting person, be documented by the Whistleblowing Officer by recording on a device suitable for storage and listening or by minutes. In case of minutes, the reporting person may verify, correct and confirm the minutes of the meeting by his or her signature.

In the report archive, personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Personal data - including special categories of data and judicial data - disclosed as part of the reporting will be processed in accordance with the provisions of the European Regulation 2016/679 on the Protection of Personal Data ("GDPR") and according to the relevant Company's policies.

VII. DISCIPLINARY SYSTEM

Failure to comply with the principles and rules contained in this policy entails the application of the disciplinary system adopted by Technoprobe, including disciplinary system provided for by 231 Model with regard to Technoprobe S.p.A.

VIII. DOCUMENT HISTORY

Revision 1.0 – Released July 14th, 2023

Verified and approved by the CEO, Stefano Felici, accordingly to proxy granted him with resolution of the Board of Directors of Technoprobe S.p.A. of June 22, 2023.