

Altopascio, 29/04/2024

Object: Introduction to Microtest S.p.A Supplier Code of Conduct

Microtest S.p.A. (hereafter also referred to as “Microtest”) has adopted the Responsible Business Alliance (RBA)’s Code of Conduct Version 8.0, based on International Labour Organization (ILO) principles and in turn used its content to inform the principles for its *Supplier Code of Conduct* (hereafter also referred to as “the Code”).

The choice of adopting the RBA Code of Conduct is aligned with the principles of our Quality Integrated Management Systems (IMS) (ISO 9001:2015; ISO 14001:2015; SA 8000:2014) and the related policies, which establish our commitment to:

- conform to “the requirements of applicable norms and binding laws, with particular attention to environmental protection and sustainability, health and safety of workers as well as their protection; [...]”; and
- value our “suppliers and monitoring [our] suppliers, with reference to the quality of products and services, as well as compliance with the issues of Corporate Social Responsibility, Environmental Protection and Worker Safety”.

The Code of Conduct is also aligned to our own company principles based on honesty and integrity. These principles have guided us through our history and we intend to continue to follow them faithfully.

Consequently, we request all suppliers that have business relationships with Microtest and all its subsidiaries to sign off their compliance to this Supplier Code of Conduct, with regards to those aspects applicable to the nature and the type of their business, and to confirm their ongoing monitoring and assessment towards the principles outlined within this Code.

The adherence must be guaranteed by signing the module attached and by sending it back at the latest within **20 calendar days** from the receipt of this document.

Microtest expects its suppliers to adhere to its Suppliers Code of Conduct regardless of business practice and local usage.

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SUPPLIER CODE OF CONDUCT

A. LABOUR

- It is forbidden to resort to forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons;
- Child labor is not to be used in any stage of manufacturing;
- Working hours are not to exceed the maximum set by local law;
- Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits;
- There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; harassment and unlawful discrimination are forbidden;
- There must be respect for 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 for the right of workers to refrain from such activities.

B. HEALTH AND SAFETY

- Potential hazards for workers' safety (chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training; workers must be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards;
- Emergency preparedness has to be done;
- Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness;
- Potential hazards due to workers' exposure to chemical, biological and physical agents is to be eliminated or controlled through proper design, engineering and administrative controls; workers are to be provided with and use appropriate, well-maintained, personal protective equipment and educational materials about the risks associated with these hazards;
- Physically demanding tasks, are to be identified, evaluated and controlled;
- Production and other machinery shall be evaluated for safety hazards. Physical guards, Potential hazards due to the use of production machinery are to be identified and evaluated; workers are to be provided with physical guards, interlocks and barriers;
- Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities;
- Workers are to be provided with appropriate workplace health and safety information and training.

C. ENVIRONMENTAL

- All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current;

- Pollution prevention - Emissions and discharges of pollutants and generation of waste -and resource reduction - water, fossil fuels, minerals and virgin forest products- must be implemented;
- Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed;
- Solid waste (non-hazardous) must be identified, managed, reduced and responsibly disposed of or recycled;
- Air emissions are to be routinely monitored, controlled and treated;
- It is mandatory to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal;
- It is mandatory to implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water and controls channels of contamination;
- All energy consumption and all greenhouse gas emissions are to be tracked and documented;
- When providing services to Microtest:

1-It's mandatory to collect, to package and to manage every waste according to current legislation and always in accordance with Microtest in-house referent. In case waste disposal's made by the supplier, it's mandatory to provide Microtest with a written proof to state the waste has been taken on by the supplier;

2-The supplier's staff has to be adequately informed of potential hazards that the activity performed can provide to the environment;

3-For demolition waste it's mandatory to provide Microtest the authorization for carriage and to declare the waste deposit location.

D. ETHICS

- The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement;
- It is forbidden to promise, offer, authorize, give or accept anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage;
- All business dealings should be transparently performed and accurately reflected on Participant's business books and records;
- Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; customer and supplier information is to be safeguarded;
- Standards of fair business, advertising and competition are to be upheld;
- Protection of identity and non-retaliation must be guaranteed;
- Suppliers must assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an

adjoining country. Suppliers have to report Microtest their due diligence on the source and chain of custody of these minerals upon Microtest request;

- It is mandatory to protect the privacy of personal information of every stakeholder involved in business (suppliers, customers, consumers and employees); it is also mandatory to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

MANAGEMENT SYSTEMS

Suppliers must commit to adopt or establish a management system which scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. Suppliers should also commit to continual improvements of said systems.

REFERENCES

- *RBA Code of Conduct V.8.0. 2024;*
- *Dodd-Frank Wall Street Reform and Consumer Protection Act*
- *<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>*
- *Eco Management & Audit System http://ec.europa.eu/environment/emas/index_en.htm*
- *Ethical Trading Initiative www.ethicaltrade.org/*
- *ILO Code of Practice in Safety and Health*
www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf
- *ILO International Labor Standards*
www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm
- *ISO 14001 www.iso.org*
- *National Fire Protection Association www.nfpa.org/catalog/home/AboutNFPA/index.asp*
- *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from ConflictAffected and High Risk Areas <http://www.oecd.org/corporate/mne/mining.htm>*
- *OECD Guidelines for Multinational Enterprises*
<http://www.oecd.org/investment/mne/1903291.pdf>
- *OHSAS 18001 <http://www.bsigroup.com/en-GB/ohsas-18001-occupational-health-and-safety/>*
- *Universal Declaration of Human Rights www.un.org/Overview/rights.html*
- *United Nations Convention Against Corruption <https://www.unodc.org/unodc/en/treaties/CAC/>*
- *United Nations Global Compact www.unglobalcompact.org*
- *United States Federal Acquisition Regulation www.acquisition.gov/far/*
- *SA 8000 <https://sa-intl.org/programs/sa8000/>*
Social Accountability International (SAI) www.sa-intl.org