

Altopascio, 24/12/2020

**Subject: Introduction to the Microtest Code of Ethics**

Microtest Srl, according to its Integrated Management System (ISO 9001: 2015; ISO 14001: 2015; SA 8000: 2014), adheres to the *Code of Conduct of the Industry Responsible Business Alliance* (formerly Electronic Industry Citizenship Coalition) version 6.0 and assumes as its own Code of Ethics duly integrated with the provisions of current regulations.

The *Industry Responsible Business Alliance Code of Conduct* provides global standards for a management system designed to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business relationships are respectful of environment and ethically correct. The aforementioned code also contains the principles relating to the free choice of employment and freedom of association, reasonable working hours, fair wages and benefits, the absence of discrimination in the workplace, the prohibition of child labor.

Our business is founded on the principles of honesty and integrity: these principles have guided us throughout history, we have always been faithful to them and we intend to continue to observe them faithfully.

Giuseppe Amelio  
President and C.E.O.

## CODE OF CONDUCT

This Code of Conduct (hereinafter also the "Code of Ethics" or "Code") contains a series of rules aimed at ensuring that working conditions in the electronics industry or in industries whose key component is electronics and related supply, are safe and based on respect and dignity of workers and that the business activity is based on ethics and environmental responsibility. This Code applies to Microtest S.r.l. (hereinafter also "Microtest" or the "Company") as well as to the companies controlled by it, directly or indirectly.

For the purposes of this Code, all those organizations that design, market, manufacture or supply goods and services that are used to manufacture electronic devices fall within the electronics industry. Any company in the electronics sector can voluntarily adopt the Code and subsequently apply it to its supply chain and to subcontractors, including outsourced production suppliers.

To adopt the Code and acquire participant status, a company must declare its support for the Code and actively undertake to ensure compliance with the Code and its rules, based on a management system described in this document.

Participants are required to consider the Code as a global initiative for the supply chain. As a minimum requirement, participants must also require acceptance and adoption of the Code from their direct suppliers.

Fundamental to the adoption of the Code is the awareness that the company, in all its activities, must act in full compliance with the laws, rules and regulations of the countries in which it operates. In addition, the Code encourages participants to go beyond mere legal compliance, using internationally recognized standards to advance in terms of social and environmental responsibility and business ethics. Compliance with the Code cannot under any circumstances cause a violation of local laws. In line with the UN Guiding Principles on Business and Human Rights, the provisions of this Code are derived from major international human rights standards, including the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. ) and the UN Universal Declaration of Human Rights.

RBA aims to regularly gain input from all stakeholders in developing and consistently implementing the Code of Conduct.

The Code consists of six sections. Sections A, B, and C respectively outline the rules on working conditions, health and safety and the environment. Section D contains the rules regarding business ethics; Section E indicates the fundamental aspects of an acceptable system for managing compliance with the Code itself; Section F contains the final provisions.

### A. WORKING CONDITIONS

Microtest is committed to defending the human rights of workers and to treating them with dignity and respect, according to the standards of the international community. This applies to all workers, whether they are temporary workers, migrants, students, contract workers, direct employees or workers of any other type. The Company undertakes to put in place working conditions that are functional to the protection of the psychophysical integrity of the workers and respect for their

personality, favoring the exchange of information and experiences to obtain a continuous increase in technical skills. With this in mind, special training and refresher programs are promoted in order to ensure adequate professional competence of the staff. Workers or potential workers must be provided with reasonable accommodation for religious practices and must not undergo any medical examination and / or physical examination that could be conducted in a discriminatory manner.

Equal opportunities are guaranteed for all subjects even at the time of personnel research and selection based on objective criteria of competence and professionalism.

Any discriminatory practice in the training, management, development and remuneration of personnel is also expressly prohibited.

The attention that Microtest pays to its employees concerns:

- compliance with the contractual regulations in force for the regulation of independent and subordinate employment relationships;
- the training of its employees and their human and professional growth within the Company;
- communication to its employees about the progress and prospects for company development;
- the protection of the health of its employees by applying all current safety regulations;
- the inclusion of each employee within the best possible conditions to achieve objective terms in line with the function;
- the promotion of a condition capable of favoring the free expression of its employees without any kind of conditioning.

The rules for the working conditions on which this Code is based are as follows:

#### 1) Free choice of occupation

It is forbidden to use forced, bonded (including debt bond) or contracted labor, prisoners used as forced or exploited labor, slavery and human trafficking. The prohibited practices include carrying, illegally giving shelter, recruiting, transferring and receiving people through the use of threats, violence, coercion, kidnapping or fraud for the purpose of exploitation. There must be no unreasonable restrictions on the freedom of movement of workers, neither within the structures managed by the Company nor for entry or exit from such structures. As part of the hiring process, the Company must provide workers with an employment contract written in their native language that contains a description of the terms and conditions of employment, prior to departure from their country of origin and no changes or substitutions must be permitted. In the employment contract upon arrival in the receiving country, unless these changes are made to satisfy local law and provide fair or better terms. All work must be voluntary, and workers must be free at any time to leave their jobs or end their employment. Employers and employment agencies must not detain, destroy, conceal, confiscate or prevent workers from accessing their identity or immigration documents, such as government-issued identification documents, passports or work permits, except in cases where this is required by law. Workers should not be obliged to pay the commissions of employers or employment agencies, or other commissions related to their hiring. If workers pay such commissions, they will be entitled to reimbursement.

## 2) Child labor

Microtest condemns child labor and is committed to promoting to interested parties, both internal and external, actions aimed at developing the culture of protecting young people at work.

In detail, the Company undertakes to:

- only hire people over 18 years of age;
- comply with the legislation that protects the needs related to student workers;
- promote forms of collaboration with non-governmental organizations (NGOs) to support policies for the protection of minors.
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If the Company's staff becomes aware of employment of child labor with suppliers, subcontractors or customers, internal communication procedures must be activated to immediately alert the management bodies who will promptly contact the competent Authorities to report the unlawful conduct put in place by the counterpart. .

If the employees of the Company become aware of the employment of young workers with third parties, procedures must be activated in order to ensure that the aforementioned workers are not assigned tasks or duties that could compromise their health and / or safety, including night tours and overtime.

## 3) Working hours

Studies on work practices closely correlate stress with lower productivity, higher staff turnover, and increased injuries and illnesses. Working hours must not exceed the maximum limit set by local legislation. Furthermore, the working week must not exceed 60 hours, including overtime, except for emergency situations or of an extraordinary nature. Workers must be allowed at least one day off every seven days.

## 4) Wages and social security benefits

Microtest requires workers to be provided with a declaration that , for each salary, includes detailed and understandable information to verify the compensation for the work done in the reference period. Workers' wages must comply with all applicable regulations, including those regarding minimum wages, overtime and statutory social security benefits. In compliance with local laws, overtime must be paid at a rate higher than the normal hourly rate. It is not allowed to reduce the salary as a disciplinary measure. For each pay period, workers will need to receive timely and understandable pay slips, which include enough information to allow accurate payroll verification for the activities performed. Any use of temporary or outsourced workers must respect the limits imposed by local laws.

## 5) Right to humane treatment and protection of the person

Microtest safeguards the moral integrity of its employees and also guarantees working conditions that respect the dignity of the person. Therefore, any form of cruel and inhumane

treatment of workers is prohibited; Unacceptable practices include sexual harassment and abuse, corporal punishment, attitudes of psychological violence , verbal assaults and the simple threats of similar treatments, however damaging to the person, his preferences and beliefs. Disciplinary policies and procedures in support of the aforementioned principles are clearly defined and communicated to workers.

6) Prohibition of discrimination

Microtest is committed to ensuring a workplace free from harassment and discrimination. In the course of the employment relationship (as regards, for example, promotions, rewards and access to training), companies must avoid any form of discrimination based on race, skin color, age, gender, sexual orientation, identity and gender expression, ethnicity or nationality of origin, presence of any disabilities, pregnancy, religion, political affiliation, union membership, veteran status, protected genetic information or marital status. The selection activity is carried out, in full compliance with the regulations in force regarding the protection and protection of the personal data of the counterpart , in order to guarantee the candidates' privacy rights, with a guarantee of objectivity and transparency, without any for but of favoritism and without discrimination of any kind. Furthermore, during the recruitment phase, workers and candidates must not be subjected to medical or physical examinations that could be used in a discriminatory way.

7) Freedom of association

In accordance with current legislation , the right of all workers to form or join a trade union of their choice, to be represented in collective bargaining and to participate in peaceful demonstrations and assemblies, or to refrain from such forms of association , is guaranteed. participation. Workers and / or their union representatives must be able to communicate openly and express their views and concerns to management regarding working conditions and management practices, without fear of retaliation, intimidation or harassment.

8) Standards of conduct

Employees of the Company, in their relations with each other and with their superiors, must behave respectfully, considering the hierarchies, company regulations as well as any difficult conditions due to reasons of health, age or family problems of colleagues. Each employee and collaborator is required to use the company assets made available to him with care, diligence and parsimony. Specifically, responsible behavior is required, such as to avoid improper use which could otherwise lead to direct or indirect damage to the interests of the Company.

## **B. HEALTH AND SAFETY**

Microtest promotes , in addition to minimizing injuries and illnesses related to working conditions, a healthy and safe working environment necessary to guarantee the quality of products and services, the continuity of production, the morale of workers and their loyalty in towards the Company . Each employee is required to scrupulously observe all the safety and hygiene measures prescribed by

internal procedures and by current legislation on the protection of health and safety in the workplace, in order to safeguard their own safety and that of their collaborators, colleagues and third parties. Recognized management systems such as the OHSAS 18001 standard and the ILO guidelines on safety and health at work have been used as a reference in drafting the Code and can be a useful source of further information.

The health and safety regulations on which this Code is based are as follows :

1) Safety at work

Potential exposure of workers to safety hazards (e.g. from chemicals, energy, electrical or other sources, fire, vehicle traffic and falls) must be identified and assessed, and controlled by the adoption of appropriate engineering and plant engineering measures, preventive maintenance interventions, administrative safety procedures including locking and labeling devices (lockout / tagout) and continuous training activities on safety. Where hazards cannot be adequately controlled with such collective measures, workers must be equipped with appropriate personal protective equipment, in a good state of maintenance, and with information materials on the risks associated with such hazards deriving from work activities. Microtest strives to use the most suitable technologies to prevent the occurrence of any risky situations and to provide constant training and additional training to its workers. Reasonable steps must be taken to remove pregnant / nursing women from potentially hazardous working conditions, remove or reduce any occupational health and safety risks for pregnant women and nursing mothers including those associated with specific tasks working while also providing reasonable accommodations for nursing mothers.

2) Emergency preparedness

Potential emergency situations and events are identified and evaluated and using the appropriate strategies to reduce to a minimum the impact, by adopting appropriate management plans and procedures, including: signaling and emergency alarms ; evacuation of employees ; training and exercises for workers ; adoption of suitable devices for fire detection and extinguishing ; identification of suitable, free and unobstructed escape routes . These procedures are implemented and used to minimize risks to life, environment and property assets

3) Accidents and occupational diseases

The Company identifies procedures and systems aimed at preventing, managing, monitoring and reporting accidents and occupational diseases, including measures aimed at:

- encourage employee reporting;
- classify and record cases of illness and injury;
- provide the necessary medical treatment;
- investigate specific cases and take corrective measures to eliminate their causes;
- facilitate the return to work.

4) Industrial hygiene

The exposure of workers to chemical, biological and physical agents must be detected, assessed and controlled according to the hierarchy of controls. Potential dangers are eliminated or controlled through the adoption of appropriate engineering and plant engineering measures and the adoption of administrative controls. Where risks cannot be adequately controlled with such collective measures, workers are provided with adequate personal protective equipment and kept in good condition. Protection programs include information materials on the risks associated with these hazards.

5) Physically demanding activities

Exposure of workers to the hazards inherent in physically demanding activities, including manual or repetitive handling of materials and heavy lifting, prolonged standing, and assembly that is highly repetitive or requiring physical strength, is identified, assessed and controlled .

6) Machine safety

Machinery used for manufacturing or other purposes is examined for any safety hazards. Where machinery presents a risk of injury to workers, it is mandatory to provide and maintain physical protection devices, interlocks and barriers in good condition.

7) Sanitation, food and accommodation

Workers will garant SOEC the availability of toilets and clean drinking water and adequate hygiene levels n ella preparation and storage of food and the rooms in which to eat meals. Any dormitories made available by the Company or by a staff placement agency must be kept in adequate conditions of cleanliness and safety; they must also be equipped with suitable emergency exits, hot water for washing, adequate heating and ventilation, individual and secure accommodation for storing personal and valuable items and reasonable personal space, as well as ensuring reasonable freedom of access and exit.

8) Communications on health and safety

Microtest undertakes to provide its employees with adequate communication on safety information in the language of the worker or in a language that the worker can understand . Health and safety information must be clearly displayed in writing in the company structure and placed in a place that is easily visible and accessible by workers. Training is provided to all workers before starting work and regularly thereafter. Workers should be encouraged to report safety concerns.

### C. ENVIRONMENTAL RESPONSIBILITY

Microtest recognizes that environmental responsibility is an integral part of the manufacture of products quality and g effects them negative in the manufacturing community , on the environment and the natural resources of the production operations must be minimized . Recognized management systems such as the ISO 14001 standard and the Community eco-management and

audit system (EMAS) have been used as a reference in drafting the Code and can be a useful source of further information.

The rules for environmental responsibility on which this Code is based are the following:

1) Environmental Authorizations and reporting

The Company undertakes to obtain, keep and update all environmental authorizations (e.g. monitoring of discharges), certifications, approvals required for company activities , also observing operational and reporting requirements.

2) Prevention of pollution and conservation of resources

Pollutant emissions and discharges and waste generation must be minimized or eliminated at source or by adopting practices such as the addition of pollution control equipment, modification of production, maintenance and plant control processes or other suitable means. The use of natural resources, including water , fossil fuels, minerals and virgin forest products, must be saved or by adopting practices such as modifying the production, maintenance and control processes of the plants, replacement, reuse, storage, recycling of materials, or by other suitable means.

3) Dangerous substances

Chemicals and other materials that pose a risk to humans or the environment must be identified, labeled and managed to ensure that their handling, handling, storage, use, recycling or reuse and disposal take place in safe conditions.

4) Solid waste

Microtest ensures a clear and systematic approach to responsibly identify, manage, reduce, dispose or recycle solid (non-hazardous) waste.

5) Emissions into the atmosphere

Atmospheric emissions of volatile organic chemical compounds, aerosols, corrosive agents, particulates, chemicals harmful to the ozone layer and combustion products that have been generated by production activities must be characterized, regularly monitored, controlled and treated as expected before being conveyed . The Company will have to periodically monitor the performance of the control systems for its emissions into the atmosphere.

6) Restrictions on the use of materials

The Company complies with all laws and regulations in force regarding prohibitions or limitations on the use of specific substances in products and production activities, including labeling for recovery and disposal purposes.

7) Water management

The Company must implement a water management program that documents, characterizes and monitors sources, uses and discharges; looking for opportunities to reduce water consumption and control its contamination channels. In the event of occasional spills or contamination of drains, the Company provides for the immediate containment and elimination of the potentially polluting source and manages the absorbent material as waste. All wastewater must be characterized, monitored, controlled and treated as intended, before being discharged or disposed of. Routine performance monitoring of wastewater treatment and containment systems is also performed to ensure optimum performance.

8) Energy consumption and greenhouse gas emissions

Energy consumption and all greenhouse gas emissions relating to Areas 1 and 2 must be recorded and documented in each local operating office and / or centrally throughout the Company. The control measures implemented by Microtest to reduce energy consumption are:

- monitoring of energy consumption;
- raising awareness among staff regarding energy efficiency;
- periodic maintenance of the equipment.

Furthermore, Microtest establishes that compliance with environmental regulatory requirements is taken into consideration in the assessments of existing suppliers and in the assessments for the choice of new suppliers.

#### **D. ETHICAL PRINCIPLES**

The performance of any operation or activity of the Company must be based on compliance with the principles of legality, integrity, loyalty, transparency, collaboration and social responsibility.

The Director, collaborators and employees are required to act in full compliance with the rules and laws in force, as well as the Code and internal company provisions.

In order to and to assume its social responsibilities and be successful in the market, the Company is required to uphold the highest standards of ethical conduct, including:

1) Integrity in commercial activities

In all its interactions commercial, I to Companies must operate in accordance with the highest standards of integrity and Adot tare a zero tolerance policy prohibiting any form of corruption, extortion and embezzlement. Microtest , while not having foreclosures towards any customer or specific category of customers, does not entertain, directly or indirectly, relationships with people who have reason to believe belonging to criminal organizations or otherwise operating outside the law.

2) No undue advantage

It is forbidden to promise, offer, authorize, give or accept gifts or favors exceeding the normal courtesy treatments or common commercial practices, either directly or through third parties. In the event of offering gifts to employees, collaborators, executives, representatives of the

Public Administration, public officials or persons in charge of a public service, it is compulsory to immediately and in advance notify their manager, Chief Executive Officer or similar bodies .

Similarly, the Recipients of this Code who, in the exercise of their functions, receive from customers or representatives of the Public Administration, gifts, travels or other benefits of no small value and which may give rise to the possibility of conflicts of interest with the customers themselves are obliged to promptly notify their manager and the CEO.

3) Disclosure of information

All commercial operations must be conducted with the utmost transparency and must be accurately recorded in the Company's accounting records . Information relating to the working conditions, health and safety, environmental practices, commercial activities, structure, financial situation and results of the Company must be declared in accordance with the regulations in force and with the practices in use in the sector. It is unacceptable to falsify documentation and make false statements about conditions or practices used in the supply chain.

4) Intellectual property

Microtest respects intellectual property rights; the transfer of technologies and know-how must be carried out in such a way as to protect these property rights and protect the information of customers and suppliers.

5) Fairness of business activity, advertising and competition

Business activity, advertising and competition must be based on criteria of fairness.

6) Protection of identity and prohibition of retaliation

Except as prohibited by a law and force , they must be adopted programs designed to ensure the confidentiality, anonymity and protection of suppliers and employees who act as informants. The Company must have an internal communication process that allows employees to express their concerns without fear of retaliation.

7) Responsible sourcing of minerals

Microtest dev and adopt a suitable policy that addresses in a reasonable manner that the tantalum, tin, tungsten and gold present in the products they produce no finance or promote, directly or indirectly, armed groups responsible for serious violations of rights humans in the Democratic Republic of the Congo or neighboring countries. The company dev and make sure of the origin and chain of custody of these minerals and communicate to customers the due diligence measures taken if customers require it.

8) Relations with suppliers

In order to increase the value of the Company and spread the principles for ethical management throughout the "supply chain" , Microtest adopts procedures and records specifically prepared

to evaluate and monitor the commitment of suppliers to respect their own Social Responsibility policy, to share the concepts expressed in this Code of Ethics and, if necessary, implement the necessary improvements over time, also with our support.

In particular with suppliers, where applicable, the principles concerning:

- correctness of relations with its staff and compliance with current regulations on workplace safety, accident prevention and social security; fairness in relations with the Public Administration;
- compliance with all anti-money laundering, anti-terrorism and public security rules in general;
- compliance with environmental safety regulations, with specific reference also to the applicable regulations in relation to their own production and economic processes;
- compliance with the regulatory dictates in the field of labor law, in terms of correct remuneration of the supplier's staff, compliance with weekly rest times, holidays and mandatory leave, as well as the safeguarding of non-degrading or repressive working conditions;
- compliance with the legislation on health and safety in the workplace;
- in general compliance with all the regulations applicable to each one.

#### 9) Conferment of professional assignments to external collaborators

The Company carefully assesses the need to make use of external collaborators (consultants, intermediaries, agents, etc.), selecting them on the basis of criteria of adequate professional qualification and reputation (moral integrity), competence, transparency and fairness. The latter are required to scrupulously observe and apply the provisions contained in this Code. In particular, all fees and / or sums paid to them for any reason must always be adequately documented and proportionate to the professional activity performed, also in light of market conditions.

#### 10) Relations with the Public Administration

Relations with offices and representatives of the Public Administration must always be managed and conducted in strict compliance with the rules laid down by laws and regulations and in such a way that no violation of the principles contained in this Code of Ethics derives from such relations. Referring to the foregoing paragraphs, it is expressly forbidden to promise or pay or grant sums of money, goods in kind or other benefits, even personally or through a third party, with the aim of favoring the interests of the Company, as well as stealing confidential or try to establish personal relations of favor, interference, influence, such as to directly or indirectly affect the outcomes of the relations themselves.

#### 11) Relations with Customers

The Company aims to pursue the satisfaction of its customers, both in terms of product quality and service excellence.

The Company is attentive to customer requests and takes into consideration any suggestions or complaints.

## 12) Confidentiality

Microtest recognizes the importance of the protection of personal data and considers their protection one of the main objectives of its business and, therefore, ensures the confidentiality of information and personal data processed in carrying out its business. Such data and information cannot be used for purposes other than those for which they were collected and on which the interested parties have been informed and, where necessary, have explicitly given their consent. The Company adopts adequate technical and organizational security measures in order to avoid the undue dissemination, loss or destruction of such information and data.

## 13) Protection and treatment of personal data

The Company undertakes, in full compliance with the applicable legislation, to protect the personal data acquired, stored and processed in the context of its business, following the criteria of lawfulness, correctness and transparency of the processing, relevance to the declared and pursued purposes, minimization of the processing, accuracy of data, limitation of storage, as well as compliance with the legal bases for data processing. The Company also protects the rights of interested parties including the possibility of accessing, viewing, requesting correction and deletion of data, as well as the possibility of opposing and obtaining the limitation of processing.

## E. MANAGEMENT SYSTEMS

Participants must adopt or establish a management system whose scope of application is in relation to the contents of this Code. This management system must be designed in such a way as to guarantee: (a) compliance with the laws and regulations in force, as well as with the requirements of the customers regarding the activities and products of the Participant; (b) compliance with this Code; and (c) the identification and containment of operational risks relating to the Code itself. The system must also facilitate continuous improvement.

The management system must contain the following elements:

### 1) Formal commitments of a Company

A declaration of social and environmental responsibility policy affirming the Participant's commitment to compliance and continuous improvement, signed by the Management and posted publicly in the company structures in the local language.

### 2) Responsibility of the Management

The Company clearly indicates the Representative or Representatives of the Management responsible for the implementation of the management systems and programs associated with

them. The Management representative periodically checks the status of the management system.

3) Legal and customer requirements

A process aimed at identifying, monitoring and implementing the laws and regulations in force and customer requirements, including the requirements of this same Code.

4) Risk assessment and management

A process aimed at identifying legal, environmental, health and safety compliance risks in the workplace, as well as those related to work practices and ethics associated with the Company's operating activities . Determination of the relative importance of each risk and adoption of suitable procedural and physical control measures, aimed at containing the identified risks and ensuring compliance with laws and regulations in force.

5) Improvement goals

Written performance objectives, targets and implementation plans aimed at improving the results of the micro - tests in the social and environmental fields, including the periodic evaluation of the results obtained in achieving these objectives.

6) Training

Training programs for managers and workers, aimed at implementing the policies, procedures and improvement objectives of the Company , as well as to meet legal and regulatory requirements in force.

7) Communication

A process for communicating to employees, suppliers and customers clear and accurate information on the policies, practices, expectations and results of the Company.

8) Feedback, participation and employee complaint

Ongoing processes, including an effective complaint mechanism, aimed at assessing the implementation by employees or violations of the practices and conditions contemplated in this Code, obtaining feedback and encouraging constant improvement.

9) Checks and evaluations

Periodic self-assessments aimed at ascertaining compliance with the legal and regulatory requirements, the contents of the Code and the contractual clauses of customers on social and environmental responsibility.

10) Process for corrective actions

A process aimed at promptly correcting deficiencies identified during internal or external evaluations, inspections , investigations and audits.

11) Documentation and records

Creation and storage of documents and registers to ensure regulatory compliance and compliance with company requirements together with adequate confidentiality for the purpose of protecting privacy.

12) Responsibility of suppliers

A process aimed at communicating the requirements of the Code to suppliers and monitoring their compliance with it.

## F. FINAL PROVISIONS

1) Supervision of activities and monitoring of compliance with the Code

The Company has, in relation to their specific organizational characteristics and complexity, to establish appropriate person in charge to guarantee re the implementation of the provisions of the Code of Ethics.

This subject , also making use of the contribution of external experts if and when deemed appropriate:

- ascertains the correct application of the Code through a specific reporting system;
- investigates news of potential or current violations of the Code and notifies the Human Resources Department and the Administrative Body of any results, in order to adopt the most appropriate sanctioning measures;
- reports to the Administrative Body the need for any changes and / or updates;
- promotes initiatives with a widespread and in-depth knowledge and understanding of the Code;
- expresses opinions on the revision of operating procedures and internal directives in order to ensure consistency with the Code.

2) Violations of the Code

Since compliance with the principles and rules of this Code is an essential and integral part of the contractual obligations of employees, third-party collaborators and the Chief Executive Officer of the Company, the violation of the above provisions constitutes a breach of the obligations deriving from the employment relationship. subordinate or collaboration, or disciplinary offense, with all legal or contractual consequences, also with regard to the termination of the contract or the assignment and any compensation for damages. In the event of an ascertained violation of one or more provisions of this Code, the Company undertakes to impose disciplinary sanctions according to consistency, impartiality, uniformity and proportionally to the alleged violation, in compliance with the limits set by local regulations and by collective bargaining reference, if any. As far as self-employed workers and third parties are concerned, the violation of the provisions and principles contained in this Code may also lead to the termination of the contract in compliance with current legislation.

3) Reports of crimes or irregularities in the context of the employment relationship (so-called Whistleblowing)

Reports concerning any illegal conduct carried out by employees of the Company as well as by third parties who have relations with the Company can be made through two distinct channels and in the following ways:

- o paper mail to the address: Microtest Srl (c / a Board of Directors )
- o e- mail to the address: [odv@microtest.net](mailto:odv@microtest.net)

These channels are made known to the recipients of the Code of Ethics and to whom any reports may be sent and access to which is restricted to the single member of the Body.

The methods of transmission of the reports are aimed at guaranteeing the maximum confidentiality of the whistleblowers also in order to avoid retaliatory attitudes or any other form of discrimination or penalization against them.

The Company guarantees the protection of whistleblowers against any form, direct or indirect, of retaliation, discrimination or penalization (application of sanctions, demotion, dismissal, transfer or subjecting to other organizational measures that have negative, direct or indirect effects, on working conditions ) for reasons connected, directly or indirectly, to the report. At the same time, the Company reserves the right to take any action against anyone who makes untrue reports in bad faith. The Company ensures in all cases the confidentiality and anonymity of the whistleblower, without prejudice to legal obligations and the protection of the rights of the Company or of persons accused erroneously and / or in bad faith .