

Altopascio, 29/04/2024

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

Microtest S.p.A., in line with its Quality Integrated Management Systems (IMS) (ISO 9001:2015; ISO 14001:2015; SA 8000:2014), adheres to the Responsible Business Alliance (RBA)'s Code of Conduct Version 8.0, based on International Labour Organization (ILO) principles. Microtest S.p.A. has adopted RBA Code and used its content to inform the foundational principles of both its Code of Conduct and its Suppliers Code of Conduct.

The RBA Code of Conduct establishes global standards and a management system to ensure that working conditions in the electronics supply chain are safe, that workers are treated with respect and dignity, and business relationships are environmentally friendly and conducted ethically. The RBA Code of Conduct also includes the principles of free-chosen employment and freedom of association, reasonable working hours, fair wages and benefits, no discrimination in the workplace, and the prohibition of child labour.

Microtest S.p.A.'s business is built on a foundation of honesty and integrity. These core values have guided us throughout our history, and we remain steadfast in our commitment to them.

As Microtest S.p.A. continues to grow, it is key that its foundations and principles are integrated across the wider Microtest Group. Therefore, the principles reported in this document will apply to Microtest S.p.A and its (indirect or direct) controlled entities, in addition to or in alignment with their respective Code of Ethics and local legislations and norms.

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CODE OF CONDUCT

Responsible Business Alliance Code of Conduct

The RBA Code of Conduct establishes the standards to ensure that working conditions in supply chains are safe and that business is conducted responsibly, ethically, and with respect for human rights and the environment.

The Code may be voluntarily adopted by any business and subsequently applied by that business to its direct and indirect supply chain and subcontractors, including providers of contract labor.

To adopt the Code and become a participant (“Participant”), a business shall declare its support for the Code and conduct due diligence in line with the Code and its standards through the establishment and an effective management system.

Microtest S.p.A. Code of Conduct

Microtest S.p.A. (hereafter also referred to as “Microtest”) views this Code of Conduct (hereafter also referred to as “the Code”) as an essential supply chain initiative. At a minimum, we require all stakeholders, including our next-tier suppliers, to acknowledge and implement our Supplier Code of Conduct in their operations.

A key aspect of adopting this Code is the recognition that all business activities must be conducted in full compliance with applicable laws, rules, and regulations. This commitment to legal and ethical standards is fundamental to our operations and those of our supply chain partners.

In alignment with internationally recognized standards as listed under the References of this document, and drawing upon best practices in global supply chains, elements of this Code may go beyond legal compliance to advance social and environmental responsibility and business ethics. In no case can complying with the Code violate applicable laws. If, however, there are differing standards between the RBA Code and applicable law, the RBA defines conformance as meeting the strictest requirements.

The provisions of this Code are derived from and respect internationally recognized standards including:

- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
- UN Universal Declaration of Human Rights

The Code is made up of five sections:

- Section A, B, and C: Standards for Labor, Health and Safety, and the Environment, respectively.
- Section D: Standards relating to business ethics.

- Section E: Elements of an acceptable system to manage conformity to this Code.

Microtest is committed to obtaining regular input from their stakeholders in the continued development and implementation of the Code of Conduct.

A. LABOR

Microtest is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.

The labor standards are:

1) Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Employers, and agents and sub-agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers', agents' or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

2) Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Microtest shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Microtest shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Appropriate support and training to all student workers shall be provided. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation shall be provided.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

5) Non-Discrimination/Non-Harassment/Humane Treatment

Microtest safeguards the moral integrity of its employees and guarantees working conditions respectful of personal dignity. It undertakes to guarantee a workplace free from harassment and illegal discrimination. Any form of cruel and inhuman treatment of workers is therefore forbidden; unacceptable practices include sexual harassment and abuse, corporal punishment, attitudes of psychological violence, verbal aggression and mere threats of such treatment that are in any way detrimental to the person, their preferences and beliefs. Disciplinary policies and procedures in support of the above principles are clearly defined and communicated to workers. Microtest is committed to a workforce free of harassment and unlawful discrimination. During the course of employment (e.g. promotions, rewards and access to training), companies must avoid any form of discrimination on the basis of race, skin colour, age, gender, sexual orientation, gender identity and expression, ethnicity or nationality of origin, presence of any disability, pregnancy status, religion, political affiliation, trade union membership, veteran status, protected genetic information or marital status. The selection activity is carried out in full compliance with the regulations in force on the safeguarding and protection of the counterpart's personal data, in order to guarantee the privacy rights addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way. Furthermore, in the recruitment phase, workers and candidates must not be subjected to medical or physical examinations that could be used in a discriminatory manner. This was drafted in consideration of the ILO Convention on Discrimination (Employment and Occupation) (No. 111).

6) Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles and in conformance with local law, participants shall respect 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 the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

7) Standards of conduct

The Company's employees, in their relations with each other and with their superiors, must behave respectfully, taking into account the hierarchies, the Company's instructions as well as any difficulties caused by health, age or family problems of their colleagues. Each employee and collaborator is required to use with care, diligence and parsimony the company assets placed at his or her disposal. Specifically, responsible behaviour is required, such as to avoid improper use from which direct or indirect damage to the interests of the Company could otherwise arise.

B. HEALTH AND SAFETY

Microtest recognize that in addition to minimizing the incidence of work-related injuries and illnesses, a safe and healthy working environment enhances the quality of products and services, consistency of production and worker retention and morale. Microtest also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

1) Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

2) Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and

unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

3) Occupational Injury and Illness

Procedures and systems shall be in place to prevent, manage, track and report occupational injuries and illnesses, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Microtest shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

4) Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Microtest shall provide workers with safe and healthy working environments, which shall be maintained through ongoing, systematic monitoring of workers' health and working environments. Microtest shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

5) Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Microtest, or labor agents shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

8) Health and Safety Communication

Microtest shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

C. ENVIRONMENTAL

Microtest recognizes that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are as follows:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

2) Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3) Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans, or the environment shall be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

4) Solid Waste

Microtest will implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone- depleting substances shall be effectively managed in accordance with the Montreal Protocol and applicable regulations. Microtest shall conduct routine monitoring of the performance of its air emission control systems.

6) Materials Restrictions

Microtest shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

7) Water Management

Microtest shall 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 wastewaters shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Microtest will conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

8) Energy Consumption and Greenhouse Gas Emissions

Microtest shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Microtest shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Microtest and their agents shall uphold the highest standards of ethics including the following:

1) Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Microtest shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting 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. Monitoring,

record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3) Disclosure of Information

All business dealings shall be transparently performed and accurately reflected in Microtest's business books and records. Information regarding labour, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

6) Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers¹ shall be maintained, unless prohibited by law. Microtest shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7) Responsible Sourcing of Minerals

Microtest shall adopt a policy, available on Microtest website, and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold, and cobalt in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. Please see here our [Company Policy for Responsible Sourcing of Minerals from Conflict-Affected and High-risk Areas](#).

8) Privacy

Microtest shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Microtest shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

E. MANAGEMENT SYSTEMS

¹ Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

Microtest shall adopt or establish a management system with a scope that 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. It shall also facilitate continual improvement.

The management system shall contain the following elements:

1) Company Commitment

Microtest shall establish human rights, health and safety, environmental and ethics policy statements affirming its commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

2) Management Accountability and Responsibility

Microtest shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

3) Legal and Customer Requirements

Microtest shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

4) Risk Assessment and Risk Management

Microtest shall adopt or establish a process to identify the legal compliance, environmental, health and safety², labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with its operations. Microtest shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5) Improvement Objectives

Microtest shall establish written performance objectives, targets and implementation plans to improve its social, environmental, and health and safety performance, including a periodic assessment of its performance in achieving those objectives.

6) Training

² Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

Microtest shall establish programs for training managers and workers to implement its policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7) Communication

Microtest shall establish process for communicating clear and accurate information about Microtest's policies, practices, expectations, and performance to workers, suppliers, and customers.

8) Worker/Stakeholder Engagement and Access to Remedy

Microtest shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

9) Audits and Assessments

Microtest shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Microtest shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

12) Supplier Responsibility

Microtest shall establish a process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

FINAL PROVISIONS

1) Supervising activities and monitoring compliance with the Code

Microtest has appointed, in relation to its specific characteristics and organisational complexity, to an appropriate person in charge of ensuring the implementation of the provisions of the Code of Ethics.

This employee, will support and making use of the contribution of external experts if and when deemed appropriate, will:

- ascertain the correct application of the Code through a specific reporting system;
- investigate reports of potential or current breaches of the Code and informs the Personnel Department and the Administrative Body of the results, if any, in order to adopt the most appropriate sanctioning measures;
- notify the Administrative Body of the need for any amendments and/or updates;
- promote initiatives aimed at a widespread and in-depth knowledge and understanding of the Code; and
- express opinions on the revision of operating procedures and internal directives in order to ensure their consistency with the Code.

2) Violations of the Code

Since compliance towards the principles and rules of this Code is an essential and integral part of the contractual obligations incumbent on employees, third party collaborators and the Chief Executive Officer of the Company, any breach of the aforementioned provisions constitutes a breach of the obligations arising from the employment or contractual relationship, or a disciplinary offence, with all the consequences of the law or contract, including termination of the contract or partnership and any compensation for damages. In the event of an ascertained breach of one or more provisions of this Code, the Company will impose disciplinary sanctions consistently, impartially, uniformly and proportionally to the breach alleged, in compliance with the limits set by local regulations and collective bargaining, where existing. As far as self-employed workers and third parties are concerned, 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 offences or irregularities in the context of the employment relationship (so-called Whistleblowing)

Reports concerning possible unlawful conduct by employees of the Company as well as by third parties who have relations with the Company may be made through two separate channels and in the following ways:

- paper mail to the address: Microtest S.p.A. (c/a Board of Directors); or electronic mail to the address: odv@microtest.net
- <https://www.microtest.net/whistleblowing/>

These channels are made known to the recipients of the Code of Ethics, to whom any reports may be sent, and access to which is restricted to the Body's members only.

The procedures for the transmission of reports are aimed at guaranteeing the utmost confidentiality of whistleblowers, to safeguard them and avoid retaliatory attitudes or any other form of discrimination or penalisation against them.

Microtest guarantees the protection of whistleblowers against any form, direct or indirect, of retaliation, discrimination or penalisation (application of sanctioning measures, demotion, dismissal, transfer or submission to any other organisational measure having direct or indirect negative effects on working conditions) for reasons directly or indirectly connected with the report. At the same time, Microtest reserves the right to take any action against anyone who makes untruthful reports in bad faith.

Microtest guarantees in all cases the confidentiality and anonymity of the person making the report, without prejudice to legal obligations and the protection of the rights of the company or of the persons wrongly accused and/or acting in bad faith.

ANNEX - REFERENCES

The following references were used in preparing this Code and may be useful sources of additional information. Microtest will aim to adhere to and respect all the following conventions and standards that have informed the content of the Code:

Standards and Conventions:

- [ILO Fundamental Conventions](#)
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
 - Right to Organise and Collective Bargaining Convention, 1949 (No.98)
 - Forced Labour Convention, 1930 (No.29)
 - Abolition of Forced Labour Convention, 1957 (No.105)
 - Minimum Age Convention, 1973 (No.138)
 - Worst Forms of Child Labour Convention, 1999 (No.182)
 - Equal Remuneration Convention, 1999 (No.100)
 - Discrimination (Employment and Occupation) Convention, 1958 (No.111)
 - Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights](#)
- [Universal Declaration of Human Rights](#)
- [United Nations Convention Against Corruption](#)
- [United Nations Convention on the Rights of the Child](#)
- [United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)
- [United Nations Global Compact](#)

Other Useful References:

- [Dodd-Frank Wall Street Reform and Consumer Protection Act](#)
- [Eco Management & Audit System](#)
- [Ethical Trading Initiative](#)
- [ILO Code of Practice in Safety and Health](#)
- ISO 14001 and related standards – Environmental management
- ISO 45001:2018 - Occupational health and safety management systems
- [National Fire Protection Association](#)
- Social Accountability International (SAI)
 - SA 8000
- [United States Federal Acquisition Regulation](#)

Altopascio, 29/04/2024

Object: Explanatory Notes to Microtest Code of Ethics REV.00_29042024

To align the contents of the Microtest Code of Ethics REV.00_29042024 with the principles adopted by Microtest supplier, the following explanatory notes to the Microtest Code of Ethics were approved. These notes are aimed to complement **Part D. Ethics**:

A) Integrating points 1, 2, 3,5:

- **Accounting Practices:** Microtest is committed to having accurate, complete and transparent accounting and financial reporting, in addition to complying with current regulations. The same accounting procedures must be recorded and disclosed as required by the law, with no omissions. All payments by Microtest are performed with legal commercial transactions. Financial records are preserved in compliance with current regulations.

B) Integrating points 1, 5:

- **Competitive behaviour:** Microtest's business is carried out in accordance with the principles of honesty and fairness. This means that Microtest avoids any form of collusion with competitors, establishes fair prices for its products and services, shuns any type of unfair competition and manages business practices in compliance with ethical principles and laws.
- **Insider trading:** insider trading is strictly forbidden in Microtest, as it is illegal and contrasts with business ethics.
- **Political Support:** Microtest has a neutral position towards political groups and therefore does not donate funds, resources or time to support political parties and activities. The company also aims to remain extraneous to any involvement of its employees in political activities.
- **Charity:** on the contrary, Microtest supports entitled charitable organizations, humanitarian commitment and philanthropic donations for local communities.

C) Integrating points 4, 6, 8:

- **Responsible Social Media Use:** Microtest undertakes to use social media in a responsible way, which is in compliance with privacy laws and confidentiality standards expressed in its Code of Ethics.