

# POLICY FOR RESPONSIBLE SOURCING OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

IMS Module - MOD511 - Revision 1 of 10-03-2023

We have activated the monitoring of our suppliers to ensure that they responsibly source materials. We are committed in spreading the recognition of potential adverse effects of sourcing tin, tungsten, tantalum and gold (3TG) from the conflict regions in Africa. For this reason, we manage our suppliers list to ensure it includes suppliers able to track all 3TG used in their supply chain.

Microtest's annual suppliers updating evaluation, Microtest works with its suppliers to identify all smelters and refiners used in their supply chain. Microtest asks for information on all identified entities and evidence that those smelters/refiners do not source from mines that support armed conflict. Microtest takes as reference Responsible Business Alliance / Responsible Minerals Initiative requirements. If any supplier identifies smelters/refiners associated with armed conflict in their supply chain, Microtest will ask to remove it otherwise this supplier will be removed by the suppliers list.

## OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

### 1. Establish strong company management systems

- A. MICROTEST adopts, and clearly communicates to suppliers and the public, the company policy for the supply chain of minerals originating from conflict-affected and high-risk areas. This policy incorporates the standards against which due diligence is to be conducted.
- B. MICROTEST structures internal management to support supply chain due diligence.
- C. MICROTEST establishes a system of controls and transparency over the mineral supply chain. This includes the identification of upstream actors in the supply chain.
- D. MICROTEST strengthens company engagement with suppliers. A supply chain policy has been incorporated into contracts and/or agreements with suppliers.
- E. MICROTEST establishes a company-level, or industry-wide, grievance mechanism as an early-warning risk-awareness system.

### 2. Identify and assess risk in the supply chain

- A) MICROTEST Identified risks in their supply chain.
- B) MICROTEST assessed risks of adverse impacts in light of the standards of their supply chain policy consistent with OECD recommendations.

### 3. Design and implement a strategy to respond to identified risks.

- A. MICROTEST reports findings of the supply chain risk assessment to the designated senior management of the company.
- B. MICROTEST devises and adopts a risk management plan. It devises a strategy for risk management by either
  - i) continuing trade throughout the course of measurable risk mitigation efforts;
  - ii) temporarily suspending trade while pursuing ongoing measurable risk mitigation; or
  - iii) disengaging with a supplier after failed attempts at mitigation or where a company deems risk mitigation not feasible or unacceptable.
- C. MICROTEST Implements the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management.
- D. MICROTEST undertakes additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.

### 4. Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.

### 5. Report on supply chain due diligence. MICROTEST reports on its supply chain due diligence policies and practices within management review.

19/06/2023

Date

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