



**Microtecnica Trevisana**  
SINCE 1968

# Code of Ethics 231

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**Microtecnica Trevisana SRL**

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01.

# GENERAL ASPECTS AND GUIDING PRINCIPLES

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## Section 1. Introduction and scope of application

Microtecnica Trevisana S.r.l. is a well-established manufacturer of precision turned parts, small metal parts and radiator accessories.

Founded in 1968 by Mr. Rino De Vidi under the name “Microtecnica Veneta,” the company has grown over the years thanks to the intuition and strong determination of its founder.

His vision and dedication have allowed the company to become one of the leading manufacturers of small metal parts and precision turned parts used in various mechanical engineering fields.

Since 2017, the management of the company has been handed over to the founder’s children, who have successfully introduced innovation and faced the recent changes with great determination, making the company a key point of reference in the sector.

Microtecnica Trevisana S.r.l.’s extensive production is divided into two main categories:

- **precision small metal parts custom-made** for the client, with minimum production batches that vary based on the type of part requested;
- **production of radiator accessories.**

This Code of Ethics sets forth the values and principles, responsibilities and ethical commitments that have always inspired Microtecnica in conducting its business and corporate activities. Compliance with this Code is required of all those who, in any capacity, maintain relations or dealings with the Company.

The diffusion and implementation of the Code of Ethics also complies with the principles contained in Legislative Decree No. 231/2001 regarding the administrative liability of legal entities<sup>1</sup>. Indeed, by establishing principles and rules of conduct relevant for the reasonable prevention of the crimes referred to in the Decree, the Code must be considered an essential element of Microtecnica’s organization, management and control Model.

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1 Hereinafter also simply “Decree”.

## Section 2. Nature and purposes of the Code

The Code of Ethics is adopted through the approval of Microtecnica's Administrative Body.

This Code of Ethics applies to:

- the Company's corporate bodies (so-called senior management);
- the Company's employees (so-called internal personnel subject to management);
- the directors and employees of other companies subject to management and coordination by Microtecnica;
- Microtecnica's long-term collaborators.

The above-mentioned individuals<sup>2</sup> have the right and obligation to be aware of the content of the Code of Ethics, to apply and comply with it, to request appropriate clarifications from the Supervisory Body regarding the interpretation of its content, and to report any shortcomings and violations, or even attempted violations, of which they become aware.

"External Parties," i.e. all those with whom the Company enters into business relationships of any kind, such as clients, suppliers, and business partners, are also required to comply with this Code of Ethics. In particular, it is emphasized that Microtecnica's suppliers must comply with the values, principles and provisions of this Code.

The Company undertakes to make this Code available to all Recipients and External Parties via the company website ([www.microtecnicatevisana.com](http://www.microtecnicatevisana.com)) and may require compliance with it through appropriate contractual clauses.

Compliance with the Code of Ethics must, in fact, be considered an essential part of the contractual obligations undertaken by employees, collaborators and parties having business relationships with the Company.

## Section 3. Core values for Microtecnica

The Code expresses the fundamental values that must guide the behavior of all Recipients and External Parties to ensure correct conduct of business and corporate activities, as well as the protection of the company's assets, image and reputation.

Specifically, Microtecnica's operations, behaviors and relationships, both internal and external, are inspired by the following fundamental values, which Recipients and External Parties are also required to respect:

- **Legality, honesty, and fairness:** Microtecnica operates in compliance with national and international laws and regulations, internal procedures and this Code. Under no circumstances can

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<sup>2</sup> Hereinafter collectively defined as the "Recipients".

the pursuit of the Company's interests justify conduct contrary to the principles of fairness and legality;

- **Integrity:** in its relationships with External Parties and Recipients, Microtecnica is committed to acting fairly and transparently; avoiding misleading information and behaviors that could result in undue advantage from the weakness or lack of knowledge of third parties.
- **Loyalty and good faith:** relationships with external parties and recipients must be based on compliance with agreements, including verbal ones;
- **Relationships with public authorities:** relationships with public authorities and the public administration must be based on the utmost fairness, transparency, good faith and collaboration, in full compliance with the law;
- **Transparency:** information disseminated by Microtecnica must be complete, transparent, comprehensible and accurate;
- **Impartiality:** in relationships with stakeholders and third parties in general, Microtecnica avoids any discrimination based on age, gender, health, race, nationality, political opinions, religious beliefs, or social and personal status;
- **Human rights:** Microtecnica is committed to respecting human rights. Microtecnica does not tolerate any form of child labor, forced or compulsory labor, human trafficking or modern slavery;
- **Respect for people and equal opportunities:** Microtecnica respects the fundamental rights of individuals and guarantees equal opportunities for all;
- **Professionalism and development of human resources:** Microtecnica recognizes the centrality of human resources and protects and promotes their value with the aim of improving and enhancing the skills possessed by each employee, following a policy based on the recognition of merit and equal opportunities;
- **Conflicts of interest:** in carrying out its activities, Microtecnica strives to avoid conflicts of interest. Recipients must behave correctly and honestly, both in carrying out their activities and in their relationships with other Recipients, avoiding the pursuit of illicit or illegitimate purposes or the creation of conflicts of interest;
- **Safety, health protection, and working conditions:** the physical and moral integrity of employees is considered a primary value. Microtecnica protects workplace safety, hygiene and health and considers respect for workers' rights and current legislation regarding occupational safety, hygiene and health to be a fundamental and priority in carrying out its business activities.
- **Environment:** Microtecnica promotes respect and protection of the environment, actively committing to ensuring compliance with current environmental regulations in the conduct of its business activities.

# 02.

## PRINCIPLES AND RULES OF CONDUCT TOWARDS EMPLOYEES AND COLLABORATORS

## Section 1. Relations with employees and collaborators

Microtecnică recognizes the **central role of human resources**, as they are an essential element of the company's very existence. It places particular emphasis on enhancing, protecting and developing the skills and competences of its employees, while also ensuring a working environment where relationships are based on collaboration and fairness.

Microtecnică is committed to strict compliance with current and applicable national and international regulations regarding employment relationships. Microtecnică recognizes workers' freedom of association.

Microtecnică conducts its business by maintaining relationships with its employees based on loyalty, transparency, and mutual respect, without any discrimination—whether based on age, nationality, religious belief, political or union affiliation, language, or gender—and is committed to offering all employees the same employment and professional growth opportunities based on meritocratic criteria.

The Company condemns all forms of exploitation of human labor, particularly child labor, and fully respects women's right.

Microtecnică does not tolerate any form of irregular, forced, or compulsory labor and rejects any form of exploitation of workers. The use of child labor or any other form of forced labor is absolutely unacceptable.

Microtecnică personnel are required to perform their work with diligence, competence and loyalty and must behave correctly in carrying out their duties, avoiding the pursuit of illicit or unlawful purposes, in full compliance with applicable laws, regulations and internal procedures. Under no circumstances may the Company's interests or benefits, even potential ones, justify improper behavior. Microtecnică personnel are prohibited from giving or receiving any gift or offering or accepting participation in entertainment, events, or other forms of hospitality that could constitute a source of improper influence or incentive, including, for example, the expectation of receiving a benefit.

Gifts offered or received must be modest and reasonable in value.

## **Section 2. Respect for the health and safety of workers**

Microtecnica is committed to **promoting and consolidating a culture of safety**, developing risk awareness and compliance with applicable regulations, promoting responsible behavior among all employees, and working to preserve and improve working conditions, health and safety.

Specifically, Microtecnica is committed to:

- Worker risks are avoided, to the extent possible and guaranteed by technological advancements, including by choosing less hazardous materials and processes that mitigate risks at source;
- Unavoidable risks are properly assessed and reduced through appropriate collective and individual safety measures;
- Employee information and training are disseminated, up-to-date, and targeted;
- Preventive measures and internal investigations and controls to protect health and safety are prioritized, so as to reduce the likelihood of accidents, injuries, or non-compliance with legislative, regulatory, and technical standards.

Company employees, each within their own area of responsibility, are required to ensure full compliance with the law, the principles of this Code, company procedures, and any other internal provisions established to guarantee the protection of safety, health, and hygiene in the workplace.

## **Section 3. Harassment or mobbing in the workplace**

**Microtecnica requires that workplace relationships be free from any behavior or conduct that could be considered mobbing.**

Mobbing refers to a series of discriminatory or harassing acts and behaviors that are persistent and committed by individuals in superior positions or by other colleagues, and that constitute a deliberate form of psychological persecution or moral abuse.

Any behavior that constitutes mobbing must be promptly reported—in writing for management purposes—to one's immediate superior and/or senior management.

Any form of violence or harassment, including sexual violence or harassment based on personal or cultural differences, is also prohibited. Those who have suffered such violence or harassment have the right to immediately cease the conduct.



# 03.

## PRINCIPLES AND RULES OF CONDUCT IN CORPORATE MANAGEMENT

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## Section 1. Corporate administration

### A) Corporate administration

In conducting its business, Microtecnica condemns any conduct, by anyone, aimed at supporting, encouraging, facilitating or inducing Recipients, each within their respective areas of expertise, to violate one or more of the following principles of conduct:

- **diligence, expertise, correctness, and accuracy** in the preparation and verification of data and information to be included into financial statements, reports, or other corporate communications required by law or otherwise directed externally;
- **prohibition on harming the integrity of the company's assets** in any form or by any means;
- **prohibition on disseminating false information**, both within and outside the Company;
- **maximum cooperation, transparency, correctness, and efficiency** in relations with public supervisory authorities.

### B) Accounting/Financial Responsibility

Microtecnica condemns any behavior aimed at altering accounting and corporate information and data communicated internally or externally.

The Company ensures, in accordance with applicable law and applicable accounting principles, the regular, complete and accurate maintenance and recording of accounting records.

### C) Principles relating to corporate wrongdoing

Microtecnica prohibits any conduct, by anyone, aimed at supporting, encouraging, facilitating or inducing violations of one or more of the principles listed below.

Any conduct aimed at altering the accuracy and truthfulness of the data and information contained in financial statements, reports, or other corporate communications required by law, addressed to shareholders, the public, and the auditing firm, is prohibited.

All persons responsible for preparing the aforementioned documents are required to verify, with due diligence, the accuracy of the data and information used in preparing the aforementioned documents.

The Company requires Recipients to conduct themselves correctly and transparently in carrying out their duties, especially in relation to any requests made by shareholders, the supervisory body, and the auditor in the exercise of their respective institutional functions.

The Company's top management is prohibited from engaging in any behavior aimed at harming the integrity of the company's assets, nor from carrying out any corporate transaction that could even potentially cause damage to creditors.

Recipients must maintain a fully available and cooperative attitude towards the inspection bodies during audits and inspections by the competent public authorities.



# 04.

# BUSINESS AND INFORMATION MANAGEMENT

## Section 1. Business Management

In managing their business, Recipients are required to **behave ethically and in compliance with the law**, based on transparency, clarity, fairness and efficiency.

## Section 2. Privacy Policy

Microtecnica's activities involve the processing of personal data, which is protected by applicable privacy legislation.

Microtecnica complies with personal data protection regulations and establishes rules for compliance with privacy protection requirements.

With specific regard to the processing of employees' personal data, Microtecnica implements safeguards to inform everyone of the nature of the personal data processed by the Company, the methods of processing, storage, and disclosure of any information relating to the individual.

Microtecnica is also committed to ensuring the security of the confidential information and data in its possession.

## Section 3. Fight against criminal organizations

**The Company strongly condemns any form of organized crime, including mafia-related crime.** No business relationship will be initiated or continued with parties even suspected of belonging to or being connected to criminal organizations, or who are suspected of facilitating, in any way, even occasionally, the activities of criminal organizations.

A photograph of two women in an office environment. The woman on the left has long, wavy blonde hair and is wearing a dark top with a necklace. The woman on the right has short dark hair, wears glasses, and a light blue sweater. They are both smiling and looking at a red folder held by the woman on the right. The background shows office furniture and a computer monitor. The entire image is overlaid with a semi-transparent blue filter.

05.

PRINCIPLES AND  
RULES OF CONDUCT  
TOWARDS EXTERNAL  
PARTIES

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## Section 1. Customer Relations

Microtecnica's primary objective is to **fully satisfy its clients' needs through reliable, correct behaviors aimed at ensuring high levels of quality**. To this end, Microtecnica has adopted a quality management system certified in accordance with the UNI EN ISO 9001 standard.

The Company maintains fair and transparent relationships with clients, in compliance with laws, regulations, contracts, the Code, and internal procedures.

Recipients of the model are prohibited from engaging in business relationships with customers or potential clients known or suspected of being involved in illegal activities, and in their dealings with them, they must provide truthful, comprehensive, and accurate information.

In their dealings with clients, Recipients must not offer or accept gifts or other benefits and/or advantages that could be interpreted as a means to obtain preferential treatment for any activity related to Microtecnica and that are not attributable to normal commercial or courtesy relationships.

## Section 2. Relations with Suppliers and Collaborators

**Supplier selection is guided by the values of competition, objectivity, impartiality, fair pricing, and the quality of goods and/or services.** Microtecnica complies with antitrust and competition regulations.

The selection process for collaborators must be based on objective criteria that exclusively take into account independence, professionalism, and authority in relation to the requested activity.

The selection process for suppliers and collaborators must always be based on objective assessments, according to principles of fairness, clarity, and cost-effectiveness. Therefore, Recipients must:

- verify and ensure that each operation/transaction is legitimate, authorized, and consistent;
- evaluate the quality, suitability, cost-effectiveness, and responsiveness of offers to company

- needs, in compliance with the principles of fairness and transparency;
- give due consideration to professionalism, efficiency, and reliability.

Microtecnica expects its suppliers to adopt policies aimed at protecting natural resources, including but not limited to water, soil, and non-renewable energy sources.

Recipients are prohibited from engaging in business relationships with suppliers and collaborators known or suspected of being involved in illegal activities. In any case, relationships must be based on compliance with laws, regulations, contracts, the Code, and internal procedures.

In relationships with suppliers and collaborators, Recipients must not offer or accept gifts or other benefits and/or advantages that could be interpreted as a means to obtain preferential treatment for any activity related to Microtecnica and that are not attributable to normal commercial or courtesy relationships.

### **Section 3. Relations with competing companies**

**Competition with competitors must be fair**, focused on the quality of the activities and processes performed, and conducted through the rigorous protection of Microtecnica's tangible and intangible assets, the development of know-how, and the valorization of human capital and industrial resources.

### **Section 4. Relations with the Public Administration and other authorities**

#### **A) Institutional Relations in General**

In its institutional relations, Microtecnica is committed to:

- establishing stable channels of communication with all institutional stakeholders;
- representing its interests and positions in a transparent, rigorous, consistent, and correct manner, avoiding collusive behavior;
- complying with the strictest national and international regulations;
- aligning its conduct with the impartiality and proper conduct required of the Public Administration;
- interacting with institutional stakeholders exclusively through individuals expressly delegated to do so by Microtecnica's top management and who are not in a conflict of interest.

#### **B) Relations with the Public Administration**

Relations with the Public Administration must be characterized by **maximum transparency, clarity, and fairness**, and must not lead to partial, distorted, ambiguous, or misleading interpretations. Corrupt practices, illegitimate favors, collusive behavior, and solicitations for personal benefits for

oneself, the Company, or others are strictly prohibited.

Microtecnica must observe the following principles in its relations with the Public Administration:

- prohibition on promising or providing direct or indirect contributions, in any form, and prohibition on allocating funds and financing to support public entities, except as permitted and provided for by applicable laws and regulations;
- prohibition on directly or indirectly promising or offering money or other benefits to Italian or foreign Public Officials and/or Public Service Representatives and/or their relatives within the second degree, directly or through a third party, from which Microtecnica may derive an undue or illicit interest or advantage, unless such practices fall within legitimate usages or customs;
- prohibition of offering employment and/or commercial opportunities that could unduly benefit, directly or indirectly, Public Administration employees;
- prohibition, during any request or relationship with the Italian and/or foreign Public Administration, of improperly influencing the decisions of Public Officials or Public Service Representatives who negotiate or make decisions on behalf of the Public Administration;
- prohibition of soliciting or obtaining confidential information that could compromise the integrity or reputation of either party or that otherwise violates equal treatment and public procurement procedures implemented by the Public Administration;
- in the event of inspections or audits, guarantees collaborative conduct without hindering the work of officials, that officials are always accompanied during inspections, that complete and truthful documents and information are provided, and, if requested by Authority officials, that persons actually informed of the facts are questioned;
- in the case of grants or financing, guarantees that the documentation provided contains truthful, accurate, and comprehensive information, subject to verification of the necessary requirements;
- in the case of requests for authorizations, permits, and concessions, guarantees that Microtecnica provides truthful documentation, subject to internal verification of the required documentation and information, and that a copy is retained.
- more generally, in relations with the Public Administration, truthful and accurate information will be made available, full cooperation will be provided to officials, without hindering their work, and their requests will be responded to objectively and truthfully.

### **C) Public Funding and Grants**

Microtecnica condemns any conduct aimed at:

- obtaining any type of contribution, financing, subsidized loan, or other similar disbursement from the State, the European Union, or another public entity, through altered or falsified statements and/or documents, or through omitted information, or, more generally, through artifices or deception, including those carried out via a computer or electronic system, aimed

at misleading the granting entity;

- allocating contributions, grants, financing, or other similar disbursement obtained from the State, the European Union, or another public entity to purposes other than those for which they were awarded.

#### **D) Relations with the Judicial Authority and with Authorities with inspection powers**

In carrying out its business, **Microtecnica operates lawfully and correctly, collaborating with judicial authorities, law enforcement agencies, public supervisory authorities, and any public official or public service** representative with inspection powers and conducting investigations.

Relations with judicial authorities and judicial police bodies, as well as with any public official or public service representative with inspection powers, must be characterized by maximum transparency, fairness, and collaboration.

No Recipient may engage in economic activities, award professional assignments, or give or promise gifts, money, or other benefits to those conducting investigations and inspections, or to the competent judicial authorities.

Recipients who are subject to investigations or subpoenas for matters related to their employment relationship, and/or who are served with other judicial proceedings, must promptly inform the Company.



06.

SUPPLIER CODE  
OF CONDUCT

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All Microtecnica suppliers are required to comply with the values and principles expressed in this Code, as well as the provisions of this paragraph, and with applicable national and international laws and regulations, as well as internationally recognized human rights.

**Microtecnica requires its suppliers of goods and services to fully comply with ethics, commercial fairness, laws, and regulations in the conduct of their business**, as well as with international standards, including applicable labor laws (including those regarding working hours and wages), free competition, combating money laundering, corruption, and organized crime, as well as respect for human rights and non-compliance with activities that directly or indirectly finance or favor armed groups.

### **Human Rights**

Microtecnica suppliers must comply with applicable human rights laws and regulations and are required to respect human rights and not be directly or indirectly involved in human rights violations at any stage of their business activities.

### **Child Labor, Employment of Minors, and Forced Labor**

Microtecnica's suppliers must comply with the minimum age limit for employment established by law and meet relevant international standards. They must respect, in accordance with applicable law, freedom of association and abstain from any form of forced or compulsory labor.

The supplier shall not use or benefit from any form of forced labor and/or human trafficking, including by way of example and without limitation: labor or services performed under threat, coercion, abduction, or fraud, including compulsory overtime; restriction of freedom of movement; retention of original personal identification or immigration documents; charging fees or using a recruitment agency that charges workers recruitment fees and other commissions; or any other disproportionate means to prevent employees from voluntarily terminating their employment.

## **Discrimination and Equality**

Microtecnica requires its suppliers to respect the rights of women and minorities, respect diversity, and refrain from discriminating based on age, gender, health, race, nationality, political opinion, religious beliefs, or social and personal status.

## **Working Hours**

The supplier must ensure that working hours—including regular working hours, overtime, rest days, and breaks—comply with applicable laws and regulations in the country of operation.

## **Freedom of Association and Collective Bargaining**

The supplier will respect the right of workers to join or form unions and to bargain collectively, or the right not to join a union.

## **Wages and Benefits**

The supplier shall provide wages and benefits that comply with applicable laws and/or collective bargaining agreements. Wages must be paid promptly, within the agreed terms and in the agreed manner, or in accordance with applicable laws and regulations.

## **Health and Safety**

The supplier shall provide a safe and healthy work environment to prevent accidents and injuries and, where appropriate, provide safe and healthy housing, in accordance with applicable laws. An occupational health and safety management system compliant with applicable regulations shall be established and implemented. Employees shall receive appropriate training.

## **Environmental Protection**

The supplier shall comply with environmental protection regulations and standards that apply to its operations. Environmental impact shall be minimized, environmental protection shall be continuously improved, and resources shall be used carefully.

## **Confidentiality**

Microtecnica's suppliers shall also ensure the confidentiality and integrity of information and data obtained in any form during their relationships with Microtecnica, taking all appropriate measures to ensure their security.

## **Corruption and Bribery**

The supplier shall ensure compliance with applicable anti-corruption laws. Any form of corruption

or bribery, whether active or passive, is prohibited.

### **Money Laundering**

The Supplier must comply with relevant legal provisions regarding the prevention of money laundering and comply with its reporting obligations.

### **Fair Competition**

The Supplier shall be required to behave fairly in competition and to comply with the respective applicable competition laws.

### **Customs and Export Control Regulations**

The Supplier must comply with international customs and export control regulations and ensure the proactive exchange of information relevant to foreign trade with the aim of ensuring a secure supply chain. Suppliers must comply with all applicable export control, customs, and foreign trade regulations.

### **Product and Service Compliance**

Microtecnica requires its suppliers to deliver products that comply with current regulations and that services are provided in accordance with the provisions.

# 07.

## PRINCIPLES ON ANTI-MONEY LAUNDERING, TERRORISM AND THE PROTECTION OF INDIVIDUAL PERSONALITY

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## Section 1. Money laundering and receiving of stolen goods

**The Company condemns any conduct**, whether by senior or subordinate individuals, **that may even indirectly facilitate the commission of criminal offenses** such as criminal conspiracy, including that aimed at the illicit trafficking of narcotics or psychotropic substances, money laundering, receiving stolen goods, and in any case the use of goods, money, or other assets of illicit origin, and obstruction of justice.

Recipients must not, in any way and under any circumstances:

- receive or accept, or even promise to receive or accept, cash payments exceeding the legal limits;
- run the risk of being implicated in matters relating to the laundering of money derived from illicit or criminal activities;
- counterfeit and/or put into circulation (by purchasing and/or selling) banknotes, coins, public credit cards, revenue stamps, and watermarked paper.

Recipients who receive counterfeit or stolen banknotes or coins must inform their superior so that appropriate reports can be made.

## Section 2. Corruption

**Microtecnica condemns any conduct that could constitute an act of corruption.** Microtecnica condemns any conduct or behavior contrary to anti-corruption legislation. For this reason, all Recipients of this Code, in relation to any area of activity affecting Microtecnica, must not offer, promise, give, pay, or authorize a third party to give or pay, directly or indirectly, undue benefits, economic advantages of any value, or other benefits, including non-economic benefits, to a third party as an incentive or reward for acting or refusing to act in relation to someone's duties, nor request or ac-

cept, or authorize a third party to request or accept, directly or indirectly, undue benefits, economic advantages of any value, or other benefits, including non-economic ones, from a third party as an incentive or reward for acting or refusing to act in relation to their duties. Recipients must report to the Supervisory Board any situation that could imply an act of corruption.

### **Section 3. Protection of individual personality**

Within the framework of current legislation, **the Company condemns any behavior aimed at committing crimes against individuals.** Microtecnica's core value is the fight against all forms and expressions of racism and xenophobia.



08.

# ENVIRONMENTAL PROTECTION

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As part of its business, **Microtecnica promotes respect and protection of the environment** and requires that this commitment, and the provisions set forth below, be shared and observed by its clients and suppliers.

Microtecnica works to ensure that **non-renewable resources (such as energy, water, and raw materials) are used correctly and without waste**, and to develop and adopt increasingly environmentally friendly technologies that, among other things, **safeguard air quality and reduce greenhouse gases (GHGs)**.

Regarding waste production, Microtecnica adopts and is committed to adopting the waste mitigation hierarchy, which means it favors processes, services, and products that reduce waste production and allow for **the reuse and recycling of waste materials**, rather than processes and products that generate waste destined for disposal.

09.

# IMPLEMENTATION OF THE CODE OF ETHICS

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**Microtecnica will entrust the task of monitoring the application and compliance with the Code of Ethics to the Supervisory Body**, appointed pursuant to Legislative Decree 231/2001, and will also promote its knowledge and understanding by the Recipients.

### **Section 1. Communication and diffusion of the Code of Ethics**

In order to promote the commitment to fairness and ethical conduct that characterize Microtecnica's daily operations, the Code will be disseminated to Recipients and External Parties through specific communication activities.

Specifically, the Code will be:

- published in dedicated sections on the company website, where it will be freely downloadable;
- made available in paper form in a location accessible to all.

Furthermore, the Supervisory Board may and/or shall:

- monitor compliance with and implementation of the Code;
- develop proposals for adapting the Code, including to prevent the commission of the crimes envisaged by the Decree;
- ensure that all updates and amendments to the Code are promptly brought to the attention of all interested parties.

### **Section 2. Whistleblowing – reporting of illicit conduct and violations of the Code of Ethics and the 231 organizational model**

All stakeholders are required to report any unlawful conduct or conduct contrary to the Code of Ethics of which they become aware.

Microtecnica has, as required by applicable law, adopted a notification system pursuant to Legislative Decree No. 24 of March 10, 2023, for reporting unlawful conduct and violations of the Code

of Ethics and the organizational model.

**Microtecnica has established a reporting system described in the company's "Whistleblowing Policy"**, which is detailed in its description of how reports can be made, how they are managed, and the protections afforded to the whistleblower.

This policy is published on the company website and is freely available to anyone interested.

The Company guarantees protection to those who report in good faith against any form of retaliation, discrimination, or penalization for reasons related, directly or indirectly, without prejudice to the rights of effected parties to take action if the whistleblower is found to bear criminal or civil liability related to the false declaration, and without prejudice to legal obligations.

In any case, the confidentiality of the reporting party's identity and the information is guaranteed in all contexts subsequent to the report, without prejudice to legal obligations and the protection of the rights of the Company or of persons accused wrongly or in bad faith.

### **Section 3. Violation of the Code of Ethics and sanctioning system**

Respect and compliance with the Code of Ethics must be considered an essential part of the obligations of employees, pursuant to and for the purposes of Article 2104 of the Italian Civil Code.

Violation of the provisions of the Code may constitute a breach of employment obligations, with all legal consequences, including those related to the continuation of the employment relationship itself, and may also result in actions for compensation for damages caused by the violation.

Any behavior contrary to the provisions of the Code of Ethics will be prosecuted and sanctioned, as it is contrary to the principles that inspire Microtecnica.

For violations committed by senior management, the Supervisory Board will inform the Board of Statutory Auditors so that the necessary and appropriate measures can be taken.

With regard to external consultants who maintain a relationship with Microtecnica, violation of the Code of Ethics may result in termination or withdrawal from the contract entered into with them.

Any form of retaliation against anyone who has reported possible violations of the Code in good faith also constitutes a violation of the Code.

### **Section 4. Amendments to the Code of Ethics**

**The provisions of this edition of the Code were approved by Microtecnica's Administrative Body on September 11, 2025.**

Microtecnica's Administrative Body may review the Code at any time and make changes or additions, including upon notification from the Supervisory Body.





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