



CODE OF CONDUCT

Adopted by Management on 21st May 2026

Table of contents

I. Scope and target audience

II. Compliance with the law

III. Protection of human rights and workers' rights

3.1 Prohibition of child labour

3.2 Prohibition of forced labour

3.3 Health and safety at work

3.4 Training and career development

3.5 Discrimination, diversity and inclusion, gender equality

3.6 Working hours and remuneration

3.7 Freedom of association and collective bargaining

IV. Environment

V. Governance and ethics

5.1 Antitrust, anti-corruption and anti-money laundering

5.2 Conflict of interest

5.3 Privacy and intellectual property

5.4 Information systems and IT security

5.5 Sanctions and export controls

VI. Implementation and enforcement

VII. Reporting

I. SCOPE AND TARGET AUDIENCE

This Code sets out the ethical principles and values that underpin our corporate culture and which must guide the conduct and behaviour of all those acting on behalf of Chimibase, both within and outside the organisation.

This Code sets out the principles, guidelines and fundamental rules of conduct that employees must observe and promote, within the scope of their respective responsibilities and in accordance with their position within the organisation.

The Code is intended to guide Chimibase's conduct towards ethical behaviour by establishing a set of rules of conduct, compliance with which is an essential prerequisite for the fulfilment of the company's mission.

Consequently, the rules of the Code do not replace but rather supplement the fundamental duties of employees, and do not exempt them from compliance with the applicable civil, criminal, administrative and contractual legislation.

This Code is distributed to all staff to ensure that they are aware of its contents in advance. Furthermore, the Code will be made available in electronic format on the Chimibase website.

II. COMPLIANCE WITH THE LAW

We are committed to complying with the laws and regulations in force in the areas where we operate. If local laws and regulations are less restrictive, our actions are guided by the principles of this Code of Conduct.

III. PROTECTION OF HUMAN RIGHTS AND WORKERS' RIGHTS

We uphold and promote respect for internationally recognised human rights and

- respect the personal dignity, privacy and personal rights of every individual;
- protect and recognise the right to freedom of opinion and freedom of expression, provided that these do not harm the company's image or mission;
- do not tolerate unacceptable treatment of employees, such as physical and psychological violence, sexual and personal harassment or discrimination.

3.1 Prohibition of child labour

We do not use child labour and do not employ anyone younger than the minimum working age set by the legislation of the country where the work is carried out.

3.2 Prohibition of forced labour

Forced labour, modern slavery or similar practices that restrict freedom are prohibited. All work must be voluntary and employees must have the option to terminate the employment relationship.

3.3 Health and safety at work

We protect the health of our employees by implementing appropriate health and safety measures in the workplace (e.g. by the implementation of occupational health and safety management system).

We comply with the applicable laws on occupational health and safety, ensuring a healthy work environment and implementing effective measures to prevent accidents, injuries or occupational illnesses.

We provide training for our employees covering various areas, including the operation of equipment, risk assessment, fire safety, emergency preparedness, first aid and the proper use of the personal protective equipment provided.

3.4 Training and career development

We are committed to ensuring that all employees, without any form of discrimination, have the opportunity to advance their careers in line with their abilities.

We are committed to training our staff to enhance their skills, improve their working conditions and increase their job satisfaction.

3.5 Discrimination, diversity and inclusion, gender equality

We promote equal opportunities and do not tolerate discrimination. We treat everyone equally, regardless of gender, age, skin colour, ethnic origin, gender identity, sexual orientation, disability, religious affiliation, personal beliefs or other personal characteristics.

3.6 Working hours and remuneration

Remuneration is based on the relevant legislation and, where applicable, on binding collective agreements in force, and is supplemented by the relevant national minimum wage regulations in effect at the time. Employees are regularly provided with clear and detailed information regarding the breakdown of their payslips.

We ensure that working hours comply with laws, regulations, local standards and collective bargaining agreements, and that days off and public holidays are observed.

3.7 Freedom of association and collective bargaining

We respect the right of employees to freedom of association, freedom of assembly and collective bargaining.

IV. ENVIRONMENT

We comply with applicable environmental legislation in order to minimise our negative impact on the environment and to continuously improve our operations with a view to protecting the environment and the climate. All our employees are made aware of the importance of environmental protection.

V. GOVERNANCE AND ETHICS

5.1 Antitrust, anti-corruption and anti-money laundering

We act in accordance with national and international competition and antitrust law and do not engage in price-fixing, market-sharing or the manipulation of customers, markets or tenders.

We do not tolerate bribery or extortion: these practices undermine fair competition. In our business dealings, we do not promise, offer, guarantee, request or accept any gifts that are related to business purposes or that could give the impression of attempting to influence business decisions or obtain any other unlawful advantage, nor do we allow such promises to be made to us.

We comply with all legal obligations regarding the prevention of money laundering and do not participate in transactions intended to conceal or launder assets derived from criminal activity or obtained illegally.

5.2 Conflict of interest

We avoid conflicts of interest, both internally and externally, that could unduly influence our business relationships. If this is not possible, we disclose the existence of such conflicts.

5.3 Privacy and intellectual property

We protect confidential information and respect intellectual property, the transfer of technology and know-how must be carried out in a manner that safeguards intellectual property rights, customer information, trade secrets and non-public information. We comply with applicable laws on the protection of trade secrets and treat our business partners' confidential information accordingly.

We process, store and protect personal data in accordance with applicable laws. Consequently, personal data is treated confidentially and used only for legitimate purposes that have been defined in advance and obtained in a transparent manner. We process personal data only if it is protected against loss, alteration, unauthorised use or disclosure by means of appropriate technical and organisational measures.

5.4 Information systems and IT security

We are committed to actively promoting and strengthening information security in order to ensure the confidentiality, integrity and availability of all company information, systems and services in support of the company's strategy.

We will take all necessary measures to ensure compliance with regulations and legal requirements, but we need the help of all our employees to report any actual or suspected breaches of information security, unethical or illegal use of our systems and fraudulent activities to the relevant managers so that appropriate investigations can be carried out.

Information systems must not be used for illegal or fraudulent purposes, nor to access or disseminate material that is defamatory, offensive, racist, sexist, pornographic or otherwise objectionable.

It is not permitted to use unsecured external websites for file sharing or personal email accounts to send confidential or sensitive information (including any information that may contain personal data of colleagues, customers and suppliers).

Responsible and limited personal use is permitted provided that:

- it does not interfere with the performance of one's duties or the duties of other users;
- it does not take precedence over your professional responsibilities;
- it does not result in costs or legal liabilities for the company;
- it does not have any negative impact on the company;
- it is legal and complies with our policies on the use of information systems.

5.5 Sanctions and export controls

We are committed to complying with all applicable regulations regarding economic sanctions, embargoes and export controls adopted by the European Union or other competent authorities.

VI. IMPLEMENTATION AND ENFORCEMENT

We make every reasonable effort to implement, document and consistently apply the principles set out in this Code of Conduct.

All employees are made aware of the contents of the Code of Conduct.

Violations of the Code of Conduct that may have consequences under employment law will not be tolerated.

We communicate openly and are committed to dialogue regarding the requirements of this Code of Conduct and its implementation with our employees, customers, suppliers, and other stakeholders.

VII. REPORTING

We ask our employees and business partners to report any suspected breaches of this Code of Conduct by writing to Chimibase S.p.A. – Via Coluccio Salutati, 7 – 20144 – Milano (MI) – Italia.