

CHIORINO GROUP CODE OF CONDUCT FOR SUPPLIERS

1. INTRODUCTION

The Chiorino Group (hereinafter also referred to as "Chiorino" or "Group") promotes a responsible management of its supply chain, based on collaboration with its suppliers to achieve common and shared goals in terms of environmental and social sustainability and on adherence to principles of fairness and transparency in business relations.

For this reason, Chiorino has prepared this Supplier Code of Conduct (hereinafter also referred to as "Code") addressed to its entire supply chain and is adopted on 10/09/2024 through the approval of the Board of Directors. The Code represents an extension of the Group's Code of Ethics, which Chiorino's suppliers must adhere to.

2. PURPOSE OF THE DOCUMENT

The purpose of this Code is to share the values and principles of conduct of the Chiorino Group with its suppliers and to define the standards of conduct that they must adopt towards their employees and stakeholders. Compliance with the provisions of this Code must also be evaluated considering national and international laws and locally applicable regulations.

3. SCOPE OF APPLICATION

This Code applies to any individual, entity, company, partner, and other supplier (hereinafter "supplier") of any activity, goods, or services in favor of the Chiorino Group. Each supplier is responsible for ensuring that its employees and any subcontractors are informed about the principles stated in the Code and ensuring their application.

4. PRINCIPLES OF CONDUCT

The following are the principles that Chiorino's suppliers are required to adhere to in relation to the following areas:

- *Human Rights;*
- *Diversity, Equity and Inclusion;*

- *Ethics;*
- *Environmental Protection.*

➤ **Human Rights**

As stated in the Group's Human Rights Policy, Chiorino promotes principles and practices aimed at respecting human rights, which it considers fundamental for the development of a positive and respectful work environment.

Chiorino Group suppliers must recognize the human rights of their workers, treat them with dignity and respect, and adopt ethical work practices and procedures, respecting the human rights enshrined in the United Nations International Bill of Human Rights and the core conventions of the International Labour Organization (ILO).

Chiorino requires, by way of example but not limited to, its suppliers to:

- Avoid any form of child labor unless it is a professional internship, training program, or apprenticeship authorized by the Government and clearly beneficial to the participating individual;
- Not use any form of forced labor. Suppliers must not tolerate the use of any disciplinary practices involving physical and/or moral violence and must oppose any form of human trafficking and slavery;
- Ensure that the working hours of their employees do not exceed the maximum limit established and permitted by applicable laws;
- Grant weekly rest periods, annual leave, national holidays, as well as maternity leave, sick leave, and any other leave as allowed by law;
- Establish recognized employment relationships with their workers according to applicable national and international laws;
- Treat their employees with respect, dignity, and fairness, ensuring equal opportunities for all;
- Recognize workers' rights to join workers' organizations and engage in collective bargaining if they choose to do so;
- Pay their employees for the hours worked in accordance with applicable laws or national collective labor agreements;

- Ensure that their workers receive decent, regular, and adequate wages;
- Promote open communication regarding working conditions without workers fearing retaliation or punishment;
- Ensure that their employees have health and safety protections, adopting necessary measures and provisions to provide and maintain a safe and healthy work environment, oriented towards continuous improvement;
- Comply with applicable local and international occupational health and safety laws.

➤ **Diversity, Equity and Inclusion**

As stated in its DE&I (Diversity, Equity, and Inclusion) Policy, the Chiorino Group conducts its business activities based on specific principles of conduct aimed at valuing all forms of diversity and ensuring a fair and inclusive work environment.

Chiorino requires, by way of example but not limited to, its suppliers to:

- Ensure equal job opportunities for all individuals without any discrimination based on age, gender, culture, generation, ethnicity, sexual and religious orientation, abilities and vulnerabilities, socioeconomic background;
- Ensure a workplace free from harassment, threats, or any other form of physical, psychological, or verbal abuse or harassment;
- Not engage in any behavior that limits individual personality at any stage of the employment relationship;
- Positively evaluate all forms of diversity (e.g., cultural, gender, abilities, age) and ensure a fair and inclusive work environment;
- Treat individuals with utmost respect and dignity and ensure a work environment based on integration and support.

➤ **Ethics**

As stated in its Code of Ethics and Anti-Corruption Policy, the Chiorino Group is constantly committed to conducting its business activities transparently, honestly, and ethically, in full compliance with local and international laws and regulations.

Chiorino suppliers must conduct their activities ethically and act with integrity in line with the values expressed in the Group's Code of Ethics.

Chiorino requires, by way of example but not limited to, its suppliers to:

- Avoid situations that present, or seem to present, a potential conflict of interest;
- Comply with all applicable anti-corruption laws and not tolerate any form of corruption, money laundering, or extortion;
- Conduct their activities according to principles of healthy and fair competition, respecting all applicable laws in this regard;
- Provide goods and services that meet agreed-upon or legally required health and safety standards for consumers;
- Protect and not disclose to third parties confidential and sensitive information about Chiorino, unless explicitly authorized;
- Comply with all applicable national and international laws regarding accounting, taxation, and transparency, and refrain from any form of tax evasion, avoidance, money laundering, or other similar illegal behavior;
- Act in accordance with applicable privacy laws concerning their workers and respect their data rights;
- When accessing personal data of Chiorino employees, collaborators, customers, etc., collect and retain only legally permissible personal data that is genuinely necessary for the performance of their activities, and adopt appropriate measures to protect such data.

➤ **Environmental Protection**

As stated in its Code of Ethics and Environmental Policy, environmental protection and the conservation of natural resources, including water resources, are priority objectives for the Group. Chiorino, in carrying out its functions and activities, acts in compliance with local laws and regulations, contributing to the promotion of scientific and technological development to protect the environment and reduce and mitigate its impact as much as possible.

Chiorino requires its suppliers to comply, where possible and feasible, with the following principles, provided by way of example but not limited to:

- Operate responsibly and efficiently, minimizing negative environmental impacts;
- Comply with applicable environmental laws and regulations and obtain necessary environmental permits;

- Measure, monitor, and evaluate their environmental performance to minimize environmental impacts and mitigate environmental risks;
- Improve energy efficiency;
- Take appropriate measures to limit greenhouse gas emissions and other emissions that contribute to air pollution;
- Consider environmental issues at every stage of production, development, and service provision;
- Promote the development of products with a reduced environmental impact, that are safe for their intended use, efficient in consumption, and capable of being reused, recycled, or disposed of safely;
- Monitor, control, and reduce the use of natural resources (e.g., energy, water, raw materials) to limit waste;
- Have systems in place to prevent and mitigate accidental spills and releases into the environment;
- Adopt appropriate measures to ensure the conservation and protection of ecosystems and biodiversity;
- Use renewable resources where possible;
- Manage waste safely and adopt appropriate measures for handling, storing, and transporting hazardous substances;
- Ensure that their employees have adequate knowledge of environmental protection.

as any violations, alleged or actual, of the Supplier Code of Conduct and/or the law. This includes violations committed by any employee, consultant, partner, or other representative acting on behalf of the Supplier or the Chiorino Group.

Any behavior not in compliance with the principles set out in this document must be reported to the competent responsible person of each Group company through the appropriate communication channels specifically provided.

5. MONITORING AND REPORTING

All Chiorino Group suppliers in place at the date of adoption of this Code and new suppliers upon establishing a relationship with them are required to review this document.

The Chiorino Group reserves the right to request the necessary data from its suppliers to verify compliance with these requirements. Similarly, suppliers are required to provide the necessary information to demonstrate compliance with the Code.

Chiorino reserves the right to conduct inspections/inspections at its suppliers' premises, either by its own personnel or by third-party organizations appointed by the Group, to verify compliance with this Code.

Suppliers are required to promptly report any doubts about any requirement of the Code, as well