



CODE OF ETHICS

SEPTEMBER 2024

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LETTER FROM THE CHIEF EXECUTIVE OFFICER AND GENERAL MANAGEMENT

This Code of Conduct describes the line of action that the Company expects from the employees of QUIMIDROGA, S.A. and all the subsidiaries of the QUIMIDROGA GROUP, when performing their duties in any of its subsidiaries. QUIMIDROGA, S.A. includes all the companies comprising the Group, which shall be subject to compliance with this Code (hereinafter, all of them, "QUIMIDROGA" or the "Company", where Company shall also mean "Quimidroga Hellas Single Member IKE").

Its content is delimited by the national and international legislative framework in which the Company carries out its activities, and by the determination of the Board of Directors of QUIMIDROGA, S.A., to be perceived by its customers and suppliers worldwide as an excellent and ethical organization.

It is considered a duty of all QUIMIDROGA's employees to comply with the provisions of this Code, so, in case of any doubt regarding it, they should contact the Ethics Committee of QUIMIDROGA, S.A.

1. OBJECT

QUIMIDROGA's Code of Ethics develops the values and principles that should guide the actions of all employees, suppliers, collaborators and other individuals or legal entities related to the Company in the performance of their professional activities.

QUIMIDROGA is committed to business ethics and transparency in all its areas of activity. This Code establishes models and guidelines aimed at guaranteeing professional, ethical and responsible behavior of all the people who make up QUIMIDROGA.

2. SCOPE OF APPLICATION

The principles contained in this Code are the same for all countries in which the Company operates, regardless of local laws, customs and practices, unless these are more restrictive, in which case they will be preferentially applied.

The Code is applicable to all companies in which QUIMIDROGA has a shareholding and to all QUIMIDROGA employees, as well as to all persons who have a relationship with the Company, such as customers or suppliers.

This Code is particularly localized to apply to the Greek subsidiary of QUIMIDROGA S.A, "Quimidroga Hellas Single Member IKE".

3. CORPORATE VALUES AND PRINCIPLES OF BEHAVIOR

- ✓ **ACT RESPONSIBLY:** all QUIMIDROGA employees and other natural or legal persons bound by this Code have the responsibility to comply with it, as well as to ensure compliance by others and to report to the Ethics Committee any breach of the Code that comes to their knowledge.
- ✓ **COMPLYING WITH LEGALITY:** all natural and legal persons bound by the QUIMIDROGA Code of Ethics must strictly comply with the laws in force in the place where they carry out their activity, both in Spain and abroad¹. No order that contravenes a legal rule must be obeyed.
- ✓ **REJECTION OF FRAUD, CORRUPTION AND MONEY LAUNDERING:** QUIMIDROGA declares its commitment to the prevention of crime and fraud and, in particular, to not engaging in practices that may be considered irregular in the development of its business relationships with customers, suppliers, competitors, authorities, etc., including those related to money laundering.
- ✓ **INTEGRAL PROFESSIONAL CONDUCT:** all individuals and legal entities bound by QUIMIDROGA's Code of Ethics shall act diligently, in good faith and in an honest, loyal, objective manner, aligned with the interests of the Company.

The Ethics Committee must be informed of the initiation, progress and outcome of any judicial, criminal or administrative proceedings, of a punitive nature, in which the person bound by this Code is a party charged, or accused and which may affect him/her in the exercise of his/her duties as a professional or collaborator of the Company or harm his/her image or interests.

- ✓ **RESPECT FOR HUMAN AND LABOR RIGHTS:** QUIMIDROGA is committed to respecting all human rights and public freedoms recognized by international agreements and the legal systems of the countries in which it operates, avoiding collaborating with those who violate them.

To this end, QUIMIDROGA recognizes and complies with the ten principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption, which enjoy universal consensus, in all its business activities.

Likewise, QUIMIDROGA respects freedom of association and the right to collective bargaining, as well as non-discrimination in employment and occupation, eliminating forced labor, and rejecting child labor, all of which

are basic principles to be respected in the development of all QUIMIDROGA's business activities.

QUIMIDROGA also complies with the principles of the International Labor Organization on non-discrimination, free association and elimination of forced labor.

- ✓ **ENVIRONMENTAL PROTECTION:** QUIMIDROGA is committed to respecting the environment, complying with the standards established in the applicable environmental regulations and minimizing the impact of its activities on the environment.

- ✓ **COMPETITION PROTECTION:** QUIMIDROGA respects and promotes free, fair and honest competition, showing its absolute commitment and at the highest level with the compliance of the competition protection regulations.

4. BEHAVIORAL PATTERNS

4.1. WITH RESPECT TO THE COMPANY

4.1.1. STRENGTHENING THE COMPANY'S REPUTATION

The members of QUIMIDROGA and the people linked to it, must watch over and promote the good reputation of the Company, avoiding acting against its interests.

4.1.2. FIGHT AGAINST FRAUD, CORRUPTION AND MONEY LAUNDERING

Any fraudulent conduct is prohibited at QUIMIDROGA, regardless of whether it affects QUIMIDROGA's assets or those of third parties. Appropriate control measures must be put in place to prevent any fraudulent activity (such as fraud, embezzlement, theft, misappropriation, evasion, tax fraud or money laundering).

Likewise, the giving or acceptance of bribes of any kind is prohibited, both in the public and private sectors; hospitality, when offered in good faith and within reasonable limits, as well as those business expenses intended for the maintenance of courtesy relations or the presentation of products or services, are accepted by QUIMIDROGA.

However, QUIMIDROGA's Anti-Corruption Policy states that these favors may not be offered or accepted when they are intended to obtain or grant an improper advantage. In particular, favors of any kind must not be accepted or offered to persons holding public office.

4.2. WITH RESPECT TO THE PEOPLE WHO MAKE UP THE COMPANY

4.2.1. REGULAR WORK

In all respects, the work performed shall be based on labor relationships recognized through national law and customary practice.

Under no circumstances will child labor be engaged, in accordance with the provisions of labor regulations and international agreements in this regard. The Company operates in strict compliance with the relevant national laws (e.g. 1837 /1989) and supranational regulations to safeguard the rights and welfare of minors, ensuring their protection from exploitation, abuse, and any form of harm.

As minors, for the purposes of this policy, and in line with Greek law 1837/1989 on the protection of minors in employment are considered those individuals who have not yet attained the age of 18 years.

4.2.2. FREE CHOICE OF EMPLOYMENT

QUIMIDROGA employees will not have to leave their identity documents in the custody of the employer and will be free to leave their jobs by giving prior notice in accordance with the applicable Greek labour legislation, as each time in force.

4.2.3. WORK ENVIRONMENT

Members of QUIMIDROGA shall strive to maintain a work environment where trust, cordiality, teamwork and respect for the dignity of individuals prevail.

4.2.4. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Workers without distinction whatsoever have the right to join or form unions of their own choosing, as well as to bargain jointly, in line with applicable law.

The employer shall adopt an open attitude towards trade union activities.

Workers' representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace.

4.2.5. NONDISCRIMINATION AND EQUAL OPPORTUNITY

QUIMIDROGA promotes non-discrimination based on race, color, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of its professionals, as well as equal opportunities among them.

The Company undertakes to prevent and punish any manifestation or conduct that could be considered as violent, abuse of authority or harassment or intimidation at work, whether physical, sexual, psychological, moral or of any other nature, with harassment or intimidation being understood as any unwanted behavior that has the objective or consequence of violating the dignity of the person and creating an intimidating, hostile, degrading, humiliating or offensive environment.

Members of QUIMIDROGA shall avoid and report such harassing or intimidating conduct, and shall treat with respect and dignity all persons with whom they come into contact both in and outside the workplace in the course of their work.

The Company declares its zero tolerance to any type of violence and harassment at work, including gender-based violence and harassment, as well as sexual harassment. We are all responsible for ensuring that our conduct is characterized by respect, dignity, cooperation and mutual aid at the workplace.

4.2.6. RECONCILIATION OF PERSONAL AND PROFESSIONAL LIFE

QUIMIDROGA is committed to respecting the personal and family life of its members and will promote measures aimed at improving the balance between their personal and family life and their work responsibilities.

Working hours shall comply with national legislation as each time in force and collective reference standards (if applicable).

4.2.7. DIGNIFIED WAGE

Wages and salaries of all kinds paid to employees shall comply at least with national legal regulations and the applicable Collective Bargaining Agreement (if any).

All workers shall be provided with written and understandable information on their working conditions in relation to the main terms and conditions of employment, including wages, prior to accepting employment and on the details of their wages during the pay period in question each time they receive wages.

4.2.8. PROFESSIONAL DEVELOPMENT AND TRAINING

QUIMIDROGA will provide adequate training to its professionals, improving their knowledge and skills, as well as their possibilities of promotion in the future. The training programs will promote equal opportunities and will contribute to achieve the company's objectives.

QUIMIDROGA's professionals are committed to permanently update their technical knowledge and to take advantage of the training offered by the Company.

4.2.9. OCCUPATIONAL HEALTH AND SAFETY

The Company will adopt the necessary preventive measures to minimize occupational risks, respecting in all cases the legislation in force on the matter and any others that may be established in the future and shall maintain a work environment focused on the protection of employees' health and safety in

compliance primarily with the Greek Civil Code (art. 288 and 662) and Law 3850/2010 which regulates matters on the health and safety of employees.

Specifically, QUIMIDROGA will provide its professionals and collaborators with adequate training in occupational risk prevention and health and safety protection in the workplace, as well as supplying the necessary protective equipment and supervising and informing them of any risk situation related to their workplace.

QUIMIDROGA's professionals are committed to comply with the rules related to occupational health and safety in order to prevent and minimize occupational hazards.

4.2.10. PRIVACY AND INTIMACY

QUIMIDROGA respects the privacy of its members, in all its manifestations, and especially with regard to non-public personal information provided by them, which is considered reserved and confidential, preserving its integrity, availability and confidentiality.

The Company undertakes not to disclose the personal data of its professionals, suppliers or collaborators except with the consent of the interested parties and in cases of legal obligation or in compliance with judicial or administrative resolutions. Under no circumstances may the personal data of professionals be processed for purposes other than those legally or contractually provided for.

The Company's professionals who, due to their activity, have access to confidential information, shall undertake to keep it secret.

QUIMIDROGA professionals undertake to use in a responsible manner the means of communication that the Company makes available to them in accordance with the policies established for this purpose. These means of communication are provided for purely professional use. The user of such means of communication has no expectation of privacy in its use and the information contained therein is, to the extent permitted by applicable law, subject to review by the Company in the exercise of its control duties. The use of such means of communication implies the acceptance of these conditions.

4.2.11. RESOURCES AND MEANS OF THE COMPANY

QUIMIDROGA provides its members with the necessary resources for the performance of their activities and the means for their adequate safeguarding.

The members of the Company undertake to make responsible use of these resources, using them only for professional purposes and respecting the Company's specific rules and procedures on resources and means.

QUIMIDROGA is the owner of the property and rights of use and exploitation of the programs, computer systems, equipment and other resources, as well as of the works and rights created, developed, perfected or used by its professionals, within the framework of their work activity or based on the Company's computer facilities.

QUIMIDROGA members undertake not to exploit, reproduce, replicate or transfer the Company's computer systems and applications for purposes other than those intended by the Company. Likewise, they will not install or use in the computer resources provided by the Company, programs or applications of illegal use or susceptible to damage such resources or harm the interests of the Company or third parties related to it.

4.2.12. USE OF ARTIFICIAL INTELLIGENCE

Artificial intelligence (AI) generative tools have experienced a great development and expansion in recent years, and represent a great opportunity to improve the quality of the services offered by QUIMIDROGA, as well as to optimize the professional performance of its employees and collaborators.

However, AI tools also represent new challenges and risks that the professionals that integrate and collaborate with QUIMIDROGA must be aware of, mainly related to issues of ethics, legality, reliability and veracity; as well as aspects of data protection, confidentiality duties and intellectual and industrial property rights.

All professionals who are part of or collaborate with QUIMIDROGA, for the use of these computer tools must respect all the rules contained in the *Corporate Compliance* system of the Company, as well as, especially, the guidelines of conduct defined in the Telematic Code of Conduct approved by QUIMIDROGA.

In conclusion, QUIMIDROGA's employees and collaborators must use artificial intelligence tools only for lawful, ethical purposes and in accordance with QUIMIDROGA's values and culture, and must do so in a reasonable, prudent and diligent manner, thereby avoiding any improper, abusive, fraudulent or negligent use that may cause damage or harm to QUIMIDROGA, its customers or third parties.

4.2.13. CONFLICTS OF INTEREST | FIDUCIARY DUTY

The personnel and persons linked to the Company must avoid conflicts of interest, always giving priority to the interests of QUIMIDROGA over their individual interests.

By way of example, the following is a list of situations in which there is a risk of incurring a conflict of interest:

- ✓ Any member of QUIMIDROGA or any person related to it (by blood or affinity) has relevant economic and/or financial interests or holds a position as a director or manager in any entity that acts as a supplier, customer, competitor, business partner, contractual counterpart in general of QUIMIDROGA.

Economic and/or financial interests are understood to be any situation in which any type of economic return (certain or potential) is received from the third party, either by receiving remuneration for the provision of a professional service or by receiving a benefit due to the participation in the third party.

- ✓ As a consequence of the use of their own position in QUIMIDROGA or of the information or business opportunities acquired in the exercise of their position, any member of QUIMIDROGA obtains an advantage or benefit, whether in the form of favors, loans or any other type of personal benefit either for themselves or for third parties.

This assumption includes, for example, the case in which an employee or manager of QUIMIDROGA personally receives any courtesy, good of a certain value or service, from any customer or supplier of the Company related to its field of activity.

- ✓ An employee, manager or any member of QUIMIDROGA hires, pays, contributes or performs any action that involves an economic benefit for any person linked to it (either by blood, affinity, or through corporate relationships) who provides services as a supplier, contractor or customer of QUIMIDROGA.
- ✓ An employee, manager or any member of QUIMIDROGA supervises, reviews or influences the professional or work evaluation of any person linked to it who provides services in QUIMIDROGA.

Any employee of the Company who is in one of the aforementioned situations, does business or intends to do business in his/her own name with a business partner on behalf of QUIMIDROGA, must inform the Ethics Committee of QUIMIDROGA, S.A. in writing of any conflict of interest in his/her person or in any person related to him/her that may arise from the conduct of such business.

The personnel and persons related to the Company must respect the measures adopted by the Ethics Committee to avoid conflict of interest and must refrain from participating, directly or indirectly, in activities that may constitute a conflict of interest.

Finally, as per Greek corporate law, the Administrators of the Greek entity, as well as any third parties to whom they have delegated responsibilities, have a fiduciary duty towards the Company. Indicatively, they are required to:

- a) Refrain from pursuing personal interests that conflict with those of the Company.
- b) Promptly and adequately disclose to the other partners of the entity any personal interests that may arise from transactions of the Company falling within their duties. This includes any conflicts of interest with the Company or its affiliated entities as defined and conflict of interest between the interests of the Company and those of individuals referred to in paragraph 2 of article 99 of Greek corporate law 4548/2018, if they have a relationship with such persons.
- c) Refrain from carrying out operations related to the purpose of QUIMIDROGA for themselves or for third parties, unless the partners decide that such operations are permitted.
- (e) Refrain from being a partner in a entity which pursues the same objects as those of QUIMIDROGA, unless the partners decide that such acts are permitted.
- (f) Refrain from breaching the duty of confidentiality in respect of all general corporate affairs.

4.3. WITH RESPECT TO THE MARKET IN WHICH THE COMPANY IS INTEGRATED AND TO THE DEFENSE OF COMPETITION.

4.3.1. RELATIONSHIP WITH COMPETITORS

QUIMIDROGA is committed to compete in the markets in a fair manner, promoting free competition for the benefit of consumers and complying with the laws established in this regard (e.g., law 146/1914 on unfair competition, and law 3959/2011 on the protection of free competition).

In particular, members of QUIMIDROGA must refrain from engaging in or encouraging any practice that may be considered anti-competitive. This includes, but is not limited to, practices related to collusive behavior with competitors (cartels) (e.g., art. 1 par. 1 of Greek Law 3959/2011), practices aimed at manipulating the outcome of public

tenders, exchanges of sensitive or confidential commercial information with competitors, abusive conduct aimed at exerting unfair pressure on competitors and/or contractors, restrictive practices towards customers and/or business partners, and unfair competition practices.

Anticompetitive agreements with competitors

Article 101 of the Treaty on the Functioning of the European Union ("TFEU"), and article 1 of Greek Law 3959/2011 prohibit any type of collective agreement, decision or recommendation that has as its object or effect the prevention, restriction or distortion of competition.

An agreement is any kind of understanding between two independent operators. Specifically, the regulation does not only prohibit formal agreements (contracts), but any kind of agreement, formal or informal, written or oral, express or tacit. It also applies to agreements in which the concurrence of wills of the parties has not been formally articulated (e.g. collusion through digital tools).

Furthermore, as per said legislative framework, an undertaking is prohibited from proposing, coercing, inducing, or in any manner encouraging another undertaking to engage in agreements between undertakings, decisions by associations of undertakings, or concerted practices that have the purpose or effect of preventing, restricting, or distorting competition.

Agreements, decisions, and concerted practices shall not be deemed prohibited if they meet the following cumulative conditions:

- (a) They contribute to the improvement of product production or distribution, or promote technical or economic progress,
- (b) They ensure that consumers receive a fair share of the resulting benefits,
- (c) They do not impose on the undertakings involved any restrictions that are unnecessary for achieving those objectives, and
- (d) They do not result in the elimination of competition, or substantially reduce competition in a significant part of the relevant market.

The following forms of conduct are explicitly prohibited, particularly those that involve:

- (a) The direct or indirect determination of purchase or sale prices, or other trading conditions,
- (b) The restriction or control of production, distribution, technological development, or investment,
- (c) The allocation of markets or sources of supply,
- (d) The application of unequal terms in trade for equivalent benefits, notably through the unjustified refusal to sell, purchase, or engage in transactions in a manner that disrupts the proper functioning of competition,
- (e) Conditioning the conclusion of contracts on the acceptance of additional benefits by the parties involved, which, by their nature or according to commercial practices, are unrelated to the subject matter of the contract.

Abuse of dominant position

A dominant position is defined as a position of economic power that enables a company to prevent effective competition in the relevant market, giving it the possibility of behaving with an appreciable degree of independence vis-à-vis its competitors, its customers and, ultimately, consumers. A dominant position may also be achieved as a result of the exclusive provision or exploitation of a certain service following a public tender.

Article 102 of the TFEU and Article 2 of Law 3959/2011 prohibit the abusive exploitation by one or more companies of their dominant position in the market, and especially the following conducts:

- ✓ Predatory pricing.
- ✓ The imposition of unfair prices or commercial conditions.
- ✓ Discriminatory pricing to customers or the imposition of unequal conditions for equivalent services when this is not objectively justified.
- ✓ Refusal to negotiate or refusal to supply goods or services without objective justification.
- ✓ Limitations on production, distribution or technical development to the unjustified detriment of companies or consumers.

- ✓ The subordination of the conclusion of contracts to the acceptance of supplementary services which, by their nature or according to commercial usage, are not related to the object of such contracts.



The list of abusive practices provided above is illustrative and not exhaustive meaning that the prohibited abuse of a dominant position may occur through methods other than those specified.

Unfair acts

Article 1 of Greek Law 146/1914 prohibits acts of unfair competition that distort free competition and affect the public interest. Specifically, the unfair competition conducts typified in the Unfair Competition Law are sanctioned, provided that such conducts affect the ability of other companies to compete and the public interest.

In particular, prohibited acts include, among others, acts of boycott, exploitation of a situation of economic dependence, predatory pricing practices (, publication or disclosure of any information harmful to a competitor knowing it to be false or denigratory, communications to customers with misleading and/or denigratory content about the activities of a competitor, and acts of inducement to breach a contract with the intention of eliminating competitors from the market.

4.3.2. RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

QUIMIDROGA is committed to achieve the highest levels of quality in its services and products, competing in the market based on its own merits and complying, in any case, with the competition regulations. In its relationship with customers, the company will work under the rules of transparency, information and protection.

Article 101 of the TFEU and Greek Law 3959/2011 prohibit the imposition of conditions that are particularly restrictive of competition in contracts entered into with companies operating at different levels of the chain of production or marketing of a good or service (suppliers, customers and other business partners). In some cases, the imposition of certain types of restrictions in contracts of a vertical nature, such as supply or distribution contracts, may involve an unjustified restriction of competition. The following infringements are considered particularly serious: the direct or indirect (e.g., through incentives or pressure) fixing of resale prices or minimum resale prices to distributors; absolute territorial protection; online sales restrictions; and the exclusive and absolute allocation of a group of customers.

In relation to prices, QUIMIDROGA's members shall refrain from, among other practices, (i) imposing fixed or minimum (re)sale prices; (ii) limiting the possibility of applying discounts or freely establishing discounts; (iii) fixing the applicable margins; and (iv) exerting any type of pressure to influence the fixing of the (re)sale price.

The Company will apply criteria of objectivity and impartiality in the selection of suppliers and providers, avoiding conflicts of interest or favoritism in their selection.

Members of the Company may not receive any remuneration from customers or suppliers.

The Company guarantees the confidentiality of the data of its customers and suppliers, which will only be disclosed with their consent or by legal obligation and, where appropriate, in compliance with judicial or administrative resolutions.

Suppliers are also expected to comply with antitrust regulations, subject to negotiation between the parties.

4.3.3. CONFIDENTIALITY

The members of QUIMIDROGA shall guarantee the integrity, confidentiality and availability of the non-public information owned by the Company, which is subject to secrecy and may not be disclosed to third parties without the prior and express consent of the Company.

Any reasonable indication of leakage of confidential or proprietary information and of particular use of such information shall be reported to the Ethics Committee.

This commitment extends beyond the duration of the employment relationship with QUIMIDROGA, remaining in force after the termination of the professional relationship with the Company.

In the event of termination of the employment or professional relationship, all reserved or confidential information shall be returned by the professional, including the media on which such information is stored.

4.3.4. COMMERCIALLY SENSITIVE INFORMATION

QUIMIDROGA members undertake not to disclose information that may be considered commercially sensitive or strategic from a competitive point of view.

Sensitive or strategic commercial information is considered to be any information of strategic value, disaggregated, current and not publicly accessible, which could allow a competitor to know or deduce the behavior of QUIMIDROGA or competitors in the market.

This includes, but is not limited to, information about current or future prices, including discounts, rebates and promotions; sales figures, cost or margin data; market shares, capacity and production systems; identity of customers or suppliers (actual or potential); information about manufacturing technologies, intellectual property rights or know-how; future business strategies, including intentions to bid or not to bid for or submit bids on a particular contract; business expansion or recruitment plans, or plans to enter new markets or withdraw from a market; forecasts of future bids, demand or supply conditions or financial indicators.

This prohibition applies to all contexts in which the disclosure and/or exchange of commercially sensitive information may occur, especially in the context of industry associations, the formation of a joint venture with a competitor, the establishment of a joint venture, the subcontracting of or by competitors in the context of the execution of a public contract, the negotiation of mergers or the collaboration in the preparation of market studies or other projects of interest in the industry. In such cases, the exchange of information will be considered contrary to the regulations insofar as the information exchanged goes beyond what is necessary to successfully carry out the collaboration or project in question, even if no effective use is made of the information exchanged.

4.3.5. RELATIONSHIP WITH SHAREHOLDERS/PARTNERS

QUIMIDROGA expresses its intention of continuous and sustained creation of value for its shareholders, providing them with communication and consultation channels that allow them to obtain adequate, useful and complete information on the evolution of the Company and offering them equal treatment under identical conditions.

4.4. WITH RESPECT TO THE COMMUNITY IN WHICH THE COMPANY IS INTEGRATED

4.4.1. ENVIRONMENTAL PROTECTION

QUIMIDROGA is firmly committed to protecting and respecting the environment, constantly striving to minimize negative impacts and striving for maximum energy and

natural resource efficiency in order to preserve the biodiversity of the environments in which the company operates.

4.4.2. PREVENTION OF ILLEGAL ACTIVITIES AND COMMITMENT TO LEGALITY

QUIMIDROGA strictly complies with the laws and other regulations applicable to its activity.

The Company has an Anti-Corruption Policy to fight against fraud and corruption, which must be complied with by all employees, collaborators, suppliers and persons related to the Company. This policy limits the giving and receiving of gifts, prohibiting those that are intended as bribes or are intended to be bribes.

Similarly, the Anti-Fraud and Anti-Corruption Policy regulates situations of conflict of interest, business expenses, donations and sponsorships, all with the firm objective of avoiding any conduct that could be considered corrupt or contrary to the maxims of good faith.

QUIMIDROGA adopts the appropriate compliance measures in accordance with current legislation on the subject in those operations or activities in which it appreciates a risk of money laundering.

Members of QUIMIDROGA undertake to identify and report to the Ethics Committee any criminal or illicit activity contrary to applicable laws and the Company's corporate regulations, regardless of whether they cause a benefit or harm to QUIMIDROGA.

Likewise, any infringements of antitrust regulations that may be identified will be brought to the attention of the corresponding competition authority.

5. MONITORING, CONTROL AND SANCTION

5.1. ETHICS COMMITTEE

QUIMIDROGA's Ethics Committee is the body in charge of interpreting the Code of Ethics and implementing policies that develop it and guarantee its effectiveness, as well as compliance with the law.

Its competencies will include:

- ✓ Detect and identify the activities of the Company in which offenses and/or administrative infringements of Competition Law may be committed.
- ✓ To develop or unify the existing protocols or codes of action that contribute to the prevention of these crimes and/or administrative infringements of Competition Law.
- ✓ Establish appropriate financial resource management models to prevent the commission of crimes.
- ✓ Provide for training obligations for the Company's personnel in relation to the entity's ethical principles, zero tolerance towards criminal, anti-competitive or unethical behavior and the procedures available to them to act in the face of such behavior.
- ✓ Enable and manage the internal reporting system whereby all Company employees can confidentially and anonymously report non-compliance in this area.
- ✓ Directing and documenting the investigation of any non-compliance with the measures established in the model, as well as adopting the appropriate measures if necessary.
- ✓ Periodically verify the operation of the prevention system and promote any modifications that may be necessary as a result of non-compliance detected since the last control, new obligations introduced in the regulatory area and/or changes in the structure, composition or activity of the company.
- ✓ In short, to monitor the operation and verify compliance with the model of control and prevention of crime and/or infringement of competition regulations in such a way as to comply with the requirements imposed by current criminal and competition legislation.

The Ethics Committee will be composed of 5 members: Chief Financial Officer, Chief Financial and Administrative Officer, Chief HR and Legal Officer, Chief Technical, Quality, Safety and Environmental Officer and Head of the Legal Unit and *Compliance Officer*. The Ethics Committee will periodically report to the Chief Executive Officer and General Management on the measures adopted for the effective implementation of the Code.

5.2. PENALTY SYSTEM

QUIMIDROGA will develop the necessary measures, in accordance with current legislation, for the effective application of the Code of Ethics.

If any member of QUIMIDROGA engages in conduct contrary to competition regulations, his or her conduct may be sanctioned in accordance with the applicable legislative framework.

Violation of competition rules may even lead to dismissal of the employee.

When the Ethics Committee determines that a member of the Company has contravened the regulations in force and/or the provisions of the Code of Ethics, it will entrust the Human Resources Department with the application of appropriate measures in accordance with the system of misconduct and sanctions in accordance with the applicable legislative framework.

The corresponding legal or other consequence shall apply not only to the main violator of the Code of Ethics, but also to all those who, by their actions or omissions, approve behavior contrary to the Code or have knowledge of such violations and do not report them through the channels provided by the Company for this purpose.

All of the above is established without prejudice to civil, criminal or any other type of action that, in addition to the labor sanction, may be taken against any member of QUIMIDROGA, whether employee or manager, due to his/her conduct.

6. WHISTLEBLOWING CHANNEL

Members, suppliers, collaborators and other individuals or legal entities related to QUIMIDROGA undertake to report any conduct that may involve the commission of any irregularity or act contrary to the legality or conduct guidelines of the Code of Ethics, regardless of whether it is located in an area different from the usual scope of their activities, to the extent that the reported violations fall within the scope of the Whistleblowing Policy (e.g., protection of environment, protection of personal data).

To this end, QUIMIDROGA has set up a Whistleblower Channel managed by a platform external to the Company and therefore, ensuring at all times the possibility of anonymity of the informant and the confidentiality of the report.

INTERNAL INFORMATION SYSTEM	
OBJECTIVE	❖ Report inappropriate and irregular behavior
AVAILABLE IN²	❖ https://whistleblowersoftware.com/secure/Quimidroga
EXTERNAL RESPONSIBLE FOR SII MANAGEMENT	❖ WHISTLEBLOWING SOFTWARE (external platform)
INTERNAL SII MANAGER	❖ D. Carles Pou

Likewise, at the complainant's request, a face-to-face meeting may be held with the person in charge of the Complaints Channel and/or the Ethics Committee to explain and detail the facts of the complaint.

For more information as regards the breaches to be reported, the internal/ external reporting procedure, the record keeping and the prohibition of retaliation, we refer to QUIMIDROGA's Whistleblowing Policy.

² Web page (www.quimidroga.com) > Complaints channel (footer)

7. COMMUNICATION, DISSEMINATION, TRAINING AND EVALUATION

The Code of Ethics will be communicated and disseminated among the members of the Company in accordance with the plan approved by the Ethics Committee, which will entrust its implementation to the Human Resources Department.

QUIMIDROGA will provide training on this Code of Ethics to ensure its understanding by all members of the Company and thus ensure that everyone is in a position to comply with it.

In the case of contracting with suppliers, business partners or persons linked to QUIMIDROGA that require prior conformity with the Company's Code of Ethics, a copy of the same will be sent to them and, if applicable, of the rest of the policies that develop it for their acceptance and adherence to them.

The Ethics Committee will evaluate and prepare an annual report on the degree of compliance with the Code of Ethics. This report will be submitted to the Board of Directors of QUIMIDROGA, S.A.

8. UPDATE AND ACCEPTANCE

8.1. UPDATE

The Code of Ethics will be reviewed and updated periodically, taking into account the report of the Ethics Committee and the suggestions and proposals of the members of the Company.

Any modification to the Code of Ethics and the rest of the policies that develop it will be communicated to the members of the Company and to the suppliers, business partners or related persons who have adhered to them.

8.2. ACCEPTANCE

The members of QUIMIDROGA, as well as its suppliers, business partners or persons linked to the Company, or those who in the future establish an employment or professional relationship with QUIMIDROGA, must share values, principles and guidelines for action comparable to those established in this Code of Ethics.

9. DOUBTS AND SUGGESTIONS CHANNEL

Any doubt and/or suggestion regarding the scope or application of the provisions set forth in this Code, with respect to the Company's *Corporate Compliance System*, as well as any question regarding regulatory compliance, should be immediately raised with the *Compliance Officer* or the *Ethics Committee*, by sending it to the following e-mail address provided for this purpose:

DOUBTS AND SUGGESTIONS CHANNEL	
TARGET	❖ Raise doubts and suggestions regarding the <i>Corporate Compliance System</i> .
CONTACT COMPLIANCE OFFICE	❖ comite.etico@quimidroga.com
RESPONSIBLES	<ul style="list-style-type: none"> ❖ <i>Compliance Officer</i> ❖ <i>Ethics Committee</i>

However, the report or communication of inappropriate or irregular conduct that could violate the contents of this Policy must be reported through the Ethics Channel enabled for this purpose as provided in the Whistleblowing Policy approved by QUIMIDROGA (<https://whistleblowersoftware.com/secure/Quimidroga>).