

CHIRON Code of Conduct

Preamble

CHIRON Group SE is committed to the standards of good and responsible corporate governance. This means that the company management - Board of Directors and Managing Directors - sees compliance with legal provisions and internal company or Group guidelines as its responsibility and works towards their observance by the companies of the CHIRON Group (hereinafter referred to as "CHIRON Group").


This Code of Conduct - CHIRON Code of Conduct - is an internal CHIRON Group SE guideline of paramount importance. It represents a commitment to values by the company management and forms the basis of trust towards customers, suppliers and other business partners and stakeholders.

The CHIRON Code of Conduct also has an internal impact: The commitment to values is communicated to the bodies and employees of the CHIRON Group via the organizational and management system of the CHIRON Group and thus leads to the integration of all those acting, also taking into account ethical goals - in this way, the CHIRON Code of Conduct becomes the common canon of values for all those working in the CHIRON Group. Compliance with the CHIRON Code of Conduct is mandatory for every member of the executive bodies and every employee of the CHIRON Group.

In fulfillment of this CHIRON Code of Conduct, CHIRON Group SE issues further internal corporate guidelines; the companies of the CHIRON Group are required to implement the respective guidelines for their area of application (and, if necessary, taking into account special features resulting from their respective jurisdiction), insofar as this is necessary to make the regulations binding.

Tuttlingen, 01.06.2024

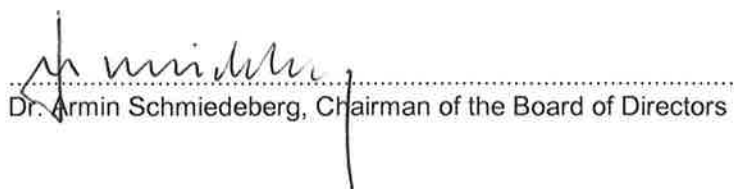
The Managing Directors of CHIRON Group SE:


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Markus Unterstein, CFO


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Bernd Hilgarth, CSO


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Dr. Claus Eppler, CTO

For the Board of Directors:


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Dr. Armin Schmiedeberg, Chairman of the Board of Directors

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1 Human rights, employee rights and human rights-related environmental due diligence obligations;

As a company with international ties, CHIRON Group SE (hereinafter referred to as "CHIRON") considers itself to have a special responsibility to work towards improving the global human rights situation along its supply chains and to shape its business relationships with a view to the 2030 Agenda (17 Sustainable Development Goals, SDGs) in terms of socially, economically and ecologically sustainable development.

We therefore align our business activities with the internationally recognized United Nations Guiding Principles on Business and Human Rights and thus implement the requirements of the National Action Plan for Business and Human Rights applicable in Germany and the German Act on Corporate Due Diligence in Supply Chains ("Lieferkettensorgfaltspflichtengesetz", "LkSG").

Our understanding of human rights due diligence is also based on the following international human rights instruments:

- United Nations Universal Declaration of Human Rights
- Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- Core labor standards of the International Labor Organization (ILO) with its five basic principles to
 - Freedom of association and the right to collective bargaining
 - Elimination of forced labor
 - Abolition of child labor
 - Prohibition of discrimination in employment and occupation
 - Occupational health and safety

Furthermore, we comply with all national and international laws and regulations applicable to us. In our opinion, compliance with the existing legal framework for our business activities offers the greatest possible guarantee of transparent and fair cooperation with business partners and respect for the competitive environment.

Our CHIRON Code of Conduct (CCoC) is therefore based not only on compliance with human rights and environmental due diligence obligations, but also on compliance with all applicable laws.

CHIRON expects all board members and employees to comply fully with applicable laws, to conduct their business with respect for human rights and to adhere to the principles described in this CCoC.

1.1 Prohibition of child labor and forced child labor

We do not employ children under the age at which compulsory schooling ends according to the law of the place of employment, whereby the minimum age may not be less than 15 years under any circumstances.

In addition, people under the age of 18 may not work for us in activities which, according to ILO Convention 182, constitute one of the worst forms of child labor, such as child slavery, child trafficking, servitude, forced or compulsory labor, child prostitution or child pornography, activities related to drugs or other activities that are harmful to the health, safety and morals of children.

1.2 Ban on forced labor

CHIRON does not employ any persons in prohibited forced or compulsory labor. All activities of all employees are on a voluntary basis, and any work for the CHIRON Group on the basis of debt bondage or human trafficking is strictly prohibited. All our employees or other persons working for us are free to leave us subject to the respective notice periods. The withholding of identity documents or work permits for the purpose of making it more difficult for employees to leave us is prohibited.

The same applies to any form of slavery, slavery-like practices, serfdom and other forms of domination and oppression in the workplace, for example through economic or sexual exploitation and humiliation.

1.3 Occupational health and safety

The health of our employees is a valuable asset of the highest priority for us. We therefore comply with all applicable occupational health and safety and working time regulations as well as health protection regulations at the place of employment in order to prevent accidents at work and work-related health hazards. In particular, we comply with all safety standards with regard to the workplace and the work equipment, provide the necessary free protective equipment against the effects of chemical, physical and biological substances and organize the work in such a way that sufficient rest and recovery breaks counteract excessive physical or mental exhaustion. With regard to accident and health protection, we continue to ensure that employees receive sufficient training and regular instruction. Compliance with occupational health and safety regulations is an obligation for everyone at CHIRON.

1.4 Freedom of association and unionization

We value cooperation with our employees and their representatives and work constructively with them, e.g. within the framework of works agreements. We therefore respect the freedom of association and recognize the right of employees to freely form or join trade unions. Employees must not be disadvantaged or favored because they form, join or belong to a trade union or other employee representative body. We enable trade unions to operate freely and in accordance with the law of the place of employment; this includes the right to strike and the right to collective bargaining.

1.5 Prohibition of discrimination; dealing with employees

We treat everyone with dignity and respect in every situation, regardless of their origin and circumstances.

Our workforce is the foundation of our entrepreneurial activity and success. It is our goal to always recruit committed and competent employees for CHIRON. The factors of age, disability, ethnic origin, nationality, social background, skin color, gender, pregnancy, sexual orientation, religion or ideology, political opinion or marital status play no role in the selection of personnel or in other dealings with our employees in the interests of equal opportunities. We respect different points of view; diversity and tolerance characterize our corporate culture.

We assess our employees on the basis of their performance and give them fair feedback. We pay equal pay for work of equal value.

We strive to resolve problems in the workplace as quickly as possible, confidentially and taking all circumstances into account. Managers support their employees in achieving a work-life balance and taking advantage of health promotion offers.

CHIRON demonstrates social commitment and is involved in various projects for environmental, social or cultural causes - both in the region and beyond. We are therefore pleased about the commitment of our employees and support their corresponding voluntary activities.

1.6 Appropriate remuneration

We pay our employees appropriately. The appropriate wage is always at least the minimum wage stipulated by the applicable law and is otherwise determined by the law of the place of employment.

1.7 Soil, water and air pollution, noise, resource consumption

CHIRON is a family-owned company. We therefore act with an eye to the future and think in terms of generations. We fulfill the regulations and standards for environmental protection and act in an environmentally conscious manner at all locations. In particular, we refrain from causing harmful soil changes, water or air pollution, harmful noise emissions or excessive water consumption that significantly impair the natural basis for the preservation and production of food, deny a person access to safe drinking water, impede or destroy a person's access to sanitary facilities or harm a person's health.

1.8 Unlawful seizure of land

We adhere to the prohibition of unlawful eviction and the prohibition of unlawful seizure of land, forests and waters in the acquisition, development or other use of land, forests and waters whose use secures a person's livelihood.

1.9 Deployment of security forces

Private or public security forces commissioned or used by us are always instructed and monitored in an appropriate manner to ensure that they comply with all applicable laws during their deployment, in particular that they observe the prohibition of torture and cruel, inhuman or degrading treatment, do not unlawfully harm the life or limb of others and do not interfere with the freedom of association and unionization of employees.

1.10 Other serious interference with protected legal position

Any other action or omission in breach of duty that is directly capable of interfering with a protected legal position of people in a particularly serious manner and impairing it, and which is obviously unlawful when all circumstances are reasonably assessed, is also prohibited under this CCoC and will not be tolerated.

1.11 Handling of mercury - Minamata Convention

We refrain from

- manufacturing mercury-added products in accordance with Article 4 (1) and Annex A Part I of the Minamata Convention on Mercury of October 10, 2013 (Minamata Convention),
- mercury and mercury compounds in manufacturing processes within the meaning of Article 5(2) and Annex B, Part I of the Minamata Convention,
- treating mercury waste contrary to the provisions of Article 11(3) of the Minamata Convention.

1.12 Dealing with persistent organic pollutants - POPs Convention

We observe the ban of

- the production and use of chemicals in accordance with Article 3 (1) (a) and Annex A of the Stockholm Convention of May 23, 2001 on Persistent Organic Pollutants (POPs Convention),
- the non-environmentally sound handling, collection, storage and disposal of waste in accordance with the regulations in force in the applicable legal system under the provisions of Article 6(1)(d)(i) and (ii) of the POPs Convention.

1.13 Handling hazardous waste - Basel Convention

We refrain from

- the export of hazardous and other waste within the meaning of Article 1 (1) and (2) of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Basel Convention)
 - to a Contracting Party that has prohibited the import of such waste,
 - to an importing State within the meaning of Article 2(11) of the Basel Convention which has not given its written consent to the particular import, if that State has not prohibited the import,
 - into a non-party to the Basel Convention,
 - to a country of import if such hazardous or other waste is not treated in an environmentally sound manner in that country or elsewhere.
- the export of hazardous waste within the meaning of Article 1 paragraph 1 from countries listed in Annex VII of the Basel Convention to countries not listed in Annex VII,
- the import of hazardous waste and other waste from a non-Party to the Basel Convention.

2 Applicable national and international laws and regulations

In addition to observing human rights, employee rights and environmental due diligence obligations, we at CHIRON comply with all national and international laws and regulations applicable to our respective locations and expect everyone working for CHIRON to support us in this.

3 CHIRON principles of transparent, fair and sustainable business conduct

CHIRON is committed to the following CHIRON Principles of Transparent, Fair and Sustainable Business Conduct, regardless of whether there are corresponding national and/or international laws or regulations that apply to us. To the extent that any applicable laws or regulations and the CHIRON Principles do not coincide, the stricter requirements shall apply.

3.1 Dealing with conflict minerals

Conflict minerals include gold, tin, tungsten and tantalum. CHIRON is aware of the fact that some of these raw materials are extracted in conflict and high-risk areas, accepting human rights violations. CHIRON is not a direct importer of such raw materials. We will examine our supply chains to an appropriate extent to determine whether the materials we procure contain conflict minerals, the areas from which they originate and the circumstances under which they were extracted.

3.2 Handling of certain chemicals

CHIRON is aware that the machines manufactured by CHIRON are subject to various legal substance requirements (e.g. due to the EU Chemicals Regulation, REACH) and that transparency about the material composition of our products is important, especially for our customers with regard to their supply chain.

3.3 Data protection, confidentiality, secrecy, information security

We process personal data exclusively in a lawful manner on the basis of applicable data protection regulations and only for legitimate purposes.

We protect the confidential information of our company and that of our contractual partners. We treat business secrets and other confidential information that we receive from our contractual partners as part of a collaboration confidentially, protect them from unauthorized access and loss and do not pass them on to third parties without authorization. In particular, we comply with confidentiality and non-disclosure agreements and any agreed information security requirements. We are particularly sensitive when dealing with insider information - information about confidential facts, e.g. of a listed business partner, which could significantly influence the price of the business partner's shares if this information were made public. We draw the attention of all persons working for CHIRON to the fact that the exploitation of insider information is prohibited and punishable by law.

Through technical and organizational measures, we ensure appropriate protection and appropriate handling of all information with regard to confidentiality, availability and integrity of data. We conduct regular training courses in the area of information security - cybersecurity; our company employees are obliged to accept invitations to such training courses.

3.4 Sustainability - ESG (Environmental Social Governance)

CHIRON attaches particular importance to the issue of sustainability. The economical use of resources and the protection of nature and the environment are important to us. Compliance with all legal requirements to this end is therefore a matter of course for us. We work continuously on our energy efficiency and on minimizing our waste, environmentally harmful emissions and wastewater. We support the concept of the "European Green Deal", the EU Commission's concept with which the EU aims to create the transition to a modern, resource-efficient and competitive economy that no longer emits net greenhouse gases by 2050. This is why we are also making special efforts above and beyond legal requirements, e.g. as part of our efforts to reduce our carbon footprint.

4 Intellectual property rights

Intellectual property rights are an important basis for every economic player. We therefore protect the intellectual property rights of CHIRON and our business partners. These include in particular, but are not limited to, copyrights, patent, utility model and design rights and existing know-how as well as company, name, brand and trademark rights and rights to business designations and similar property rights.

5 Avoidance of conflicts of interest; fair competition; antitrust law

In business activities with our customers, suppliers and other business partners, we ensure that there are no conflicts of interest that could influence business relationships. A conflict of interest would exist, for example, if the personal interests of persons acting on behalf of CHIRON could (potentially) collide with CHIRON's corporate interests, for example because a person working on the business partner's side is related to a CHIRON employee or is a close acquaintance or friend.

We hereby call on our own company employees as well as the representatives of our business partners to disclose possible conflicts of interest at any time during a business relationship in order to create transparency, so that we can carry out a review in individual cases and take appropriate measures if necessary. Our company employees should contact their line manager or the contact person for compliance, and our business partners should contact their contact person in our company, our contact person for compliance or our management.

6 Gifts and hospitality; Prohibition of bribery, corruptibility and other forms of corruption

We are guided solely by objective considerations when establishing and conducting our business relationships. We strictly reject any behavior on our part or on the part of our business partners that is aimed at influencing decisions in business matters by criteria other than objective factual criteria.

Our company employees are therefore prohibited from promising, giving, demanding or accepting monetary benefits or other gifts, favors or advantages of any other kind and from promising, giving, giving, demanding or accepting hospitality or other invitations that serve this purpose.

In addition, the giving and receiving of low-value gifts (but not money) as well as hospitality and the acceptance of hospitality invitations to an appropriate extent are permitted on the occasion of business contacts; further details are regulated by the relevant CHIRON guideline applicable in each case.

All the more, we strictly reject any form of bribery and corruptibility in business dealings, granting of advantages and bribery to public officials and any other form of corruption in Germany and abroad; every CHIRON company employee is strictly prohibited from participating directly or indirectly in such criminal behavior. Further details are set out in the applicable CHIRON policy.

7 Prohibition of money laundering and terrorist financing

As a so-called "goods trader", CHIRON is an obligated party under the German Money Laundering Act. We are aware of the fact that criminals may try to misuse legitimate companies such as CHIRON to launder money and/or to promote terrorist activities with laundered funds. We therefore inform our company employees about risk factors and thereby create the necessary knowledge and awareness to comply with all applicable money laundering regulations and not to promote the financing of money laundering or terrorism directly or indirectly. Further details are set out in the relevant CHIRON policy in force at the time.

8 Customs and foreign trade law; sanctions and embargoes

As a company that operates internationally in terms of both procurement and sales, it is essential for CHIRON to comply with all laws and other regulations relating to international trade. We therefore comply in particular with all applicable customs and foreign trade regulations. This includes strict compliance with all applicable import control, export control, embargo and sanction regulations as well as obtaining the necessary official import and export licenses.

9 Consequences of violations of the CCoC

Violations of the CCoC or of company guidelines issued in fulfillment of the CCoC will not be tolerated by CHIRON. Company employees must therefore expect not only that they will be required to change their behavior, but also that violations will result in sanctions. Sanctions are based on the severity of the violation, the degree of fault, the damage incurred and the conduct of the violator when the violation was discovered. In particular, measures under employment law up to and including dismissal, the assertion of claims for damages and, in the case of violations relevant to criminal law, criminal charges.

10 Messages and notes

Adherence to the CCoC and its enforcement are important to us and are an integral part of our compliance culture. This is the only way we can ensure that our values compass continues to point us in the right direction and that we are a reliable partner both internally and externally.

We therefore encourage all company employees to report violations of the CCoC. Our business partners are also called upon to report any misconduct with regard to the principles set out in this CCoC.

Information can be submitted - also anonymously - as follows:

- Phone: +49 (0)7461-9400
- Postal: CHIRON Group SE
c/o Legal Department
"Complaints procedure"
Kreuzstraße 75
78532 Tuttlingen
Germany
- Whistleblower/complaint mechanism, accessible via our website www.chiron-group.com.