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### 1. Basics

Legally compliant and socially responsible corporate governance is the basis for the entrepreneurial activities of the CHIRON group. Each company of our corporate group abides by the laws and regulations applicable to this company.

To ensure a high level of integrity of all our activities, this Code of Conduct has been developed. It contains the essential requirements for the behaviour of every employee of our company and provides a binding framework for all company-specific guidelines. Our internal guidelines are intended to supplement this Code of Conduct.

All businesses of the CHIRON Group are obliged to adopt corresponding minimum binding rules.

### 2. Avoiding conflicts of interest

We are ensuring that our own interests do not conflict with the interests of the company

It our own interests come into conflict with those of the company, a conflict of interest arises. We must do everything possible to avoid conflicts of interest and to resolve inevitable conflicts as quickly as possible. When doing this, we respect the privacy of every employee.

Conflicts of interest may arise in the relationship between CHIRON and its business partners, CHIRON and its employees or as a conflict of interest between different business partners. In fulfilling our professional obligations, we are guided only by the interests of the company. Our employees act independently and shall not demand, accept or be offered uncontradicted any monetary donations, gifts or other benefits or favours from persons with whom they have official business. The only exception is the generally permissible acceptance of modest gifts with a value of no more than 35 euros.

Any actual conflict of interest is to be disclosed by our employees to their respective superiors or our internally responsible compliance officer, who will decide about the treatment of this conflict of interest.



## 3. Information Protection

We protect the trade secrets of our company and those of our business partners by our confidentiality.

Our own data and information (trade secrets) are a great value of our company. We will thus handle business affairs in strict confidence. We place great emphasis on completeness and accuracy of the information provided by us, do not use confidential information improperly and do not transmit them to a third party without authorization.

We protect corporate and employee data as well as personal business partner data with all available adequate and appropriate technical and organizational measures against unauthorized access, unauthorized or improper use, lass and premature destruction.

#### 4. Respect

We treat every person, regardless of his or her origin and living conditions, with dignity and respect

Our workforce is the foundation of our business activities and success.

Our goal is to win over consistently dedicated and expert employees for CHIRON. In order to ensure equal opportunity, the factors of age, disability, ethnic origin, skin colour, gender, pregnancy, sexual orientation, nationality, religion or marital status play no role when selecting personnel.

We evaluate our employees based on their performance and give them fair feedback on it. We treat one another with dignity and respect. Employees who violate this basic principle are not compatible with us. We are committed to resolve workplace problems as quickly as possible, confidentially and taking into account all concerns. Managers support their employees to reconcile their professional and private life and to use offers for health promotion.



### 5. Fair competition and transparency

## We achieve entrepreneurial performance through fairness and honesty in competition

We maintain trustful, fair and respectful relationships with our business partners and expect the same of them. We communicate our guidelines for acting ethically and with integrity to our business partners and encourage them to orient their activities to the same norms. We take into account the laws and regulations of the countries in which we operate.

We comply with internationally recognized standards of good corporate governance. To control our business, we need transparent financial reporting.

In view of this, all employees of the company must contribute to ensure that our business transactions are recorded completely and correctly. We observe the legal prohibitions regarding insider trading.

#### 6. Workplace

#### We provide our employees with a safe and healthy work environment

Occupational safety is achieved by the role model function and responsibility of the employees. We expect all employees to observe the relevant occupational health and safety regulations.

It also includes an environmentally conscious and environmentally friendly operation. This also means compliance with applicable environmental laws and the use of sustainable technologies for us.

We handle our work equipment with care and use it only for their intended purpose. We strive to use our resources efficiently.



#### 7. Measures in case of violations

### We do not accept violations of the Code of Conduct

Violations of the Code of Conduct or the Compliance Guidelines of any kind shall not be tolerated. Involved employees are encouraged to alter their behaviour. In the case of serious violations, criminal or disciplinary action may result.

All employees are encouraged to consult the compliance officer when they become aware of such violations. The cases and the audit procedures are documented and filed in a standardized closure statement after completion of the study.

Exemptions from compliance with the Code of Conduct are subject to approval by management.

## 8. <u>Inception</u>

This Code of Conduct shall enter into force upon adoption by the Management Board.

Tuttlingen, September 1, 2021

**CHIRON Group SE** 

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