



Code of Conduct and Ethics

CHLORUM
SOLUTIONS

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Chlorum Code of Ethics



The Chlorum Group's Code of Conduct and Ethics defines the policies, principles and standards that reflect our values and our efforts to achieve sustainable development based on good governance. This Code should provide clarification and serve as a guide on how to act as a Chlorum Group employee in various matters and situations.

The Chlorum Group's Code of Conduct and Ethics has been drawn up on the basis of internationally recognized standards and frameworks, including the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO). It sets out the minimum standards that must be met by you, as well as our expectations regarding your compliance, as well as applicable local and international rules and laws, including, among others: human rights; prejudice and discrimination; health, safety and the environment; contracting suppliers; conflict of interest; anti-corruption; anti-money laundering; defense of competition; information security and data protection.

Chlorum Code of Ethics

As an employee of the Chlorum group, you must also comply with all our internal policies and procedures and ensure that processes are followed to provide products and services in compliance with the quality and safety standards required by local and international laws, regulations and standards. You must also attend all training assigned to you that deals with these policies and procedures.

We also expect our suppliers, contractors, agents and distributors (hereinafter jointly referred to as "Suppliers") to conduct their business with transparency and integrity and to be committed to standards of ethical conduct and environmental practice.

We have a zero-tolerance policy for any kind of human rights infringement and corruption. Violations related to these issues or any other principles defined in this Code will result in disciplinary measures. We encourage you to report possible violations of this Code and will provide mechanisms for such reports to be made anonymously and treated confidentially, to the extent permitted by law and in accordance with our internal policies and applicable local legislation.

We are counting on you to ensure that the way we conduct business continues to demonstrate the positive changes that we hope to see in the world and to mobilize people and companies with the same goal.

Our direct and indirect employees, shareholders, managers, directors, suppliers, customers, the community and the government are stakeholders in this Code. We believe that everyone has a responsibility to practice and spread our culture and good living practices, contributing to a positive, trustworthy, sustainable and welcoming working environment.

Alfredo Kerzner
CEO

Mission, Principles and Values



Mission, Principles and Values

Mission Simplifying the chemical industry's supply chain to reach underserved markets through decentralized, sustainable, safer and tailor-made solutions.

Guiding principles:

- To achieve profitability in our operations in a sustainable way, generating value for our shareholders.
- Building lasting relationships based on transparency, collaboration and diversity;
- Respect for all our stakeholders (shareholders, employees, the environment and the community)
- Ensuring the safety of our employees and surrounding communities;
- Empowering our employees to think like owners with a long-term mentality and agile decision-making.

Values

Values must be part of all our activities and the way we engage with our shareholders, employees and third parties.
Our values are:

- Sense of ownership
- Long-term vision
- Agility

Commitment to our
people



Commitment to Our People

As an employee of the Chlorum Group, you are responsible for the quality of our business relations, our financial relations, our relations with our shareholders and the working environment around you.

We support the principles contained in the United Nations' Universal Declaration of Human Rights and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work. We believe that respect for human rights must be ensured for our employees and all individuals who interact with Chlorum.

In this sense, our policies and procedures aim to:

- i. Zero tolerance for slave and child labor;
- ii. Make job offers that are fair, equitable and in accordance with local laws;
- iii. Promoting diversity and offering equal and fair opportunities to all;
- iv. Promoting a work environment free of harassment, bullying, prejudice and discrimination;
- v. Provide decent and safe working conditions;
- vi. Zero tolerance for corruption and favors.

"Third Party": means any natural or legal person with whom the Chlorum Group does business, who has no direct corporate, executive or employment relationship with the Chlorum Group, including suppliers and customers.

Commitment to Our People

Prejudice and Discrimination: We are committed to providing a non-discriminatory and gender-equitable work environment by treating all employees fairly. As such, we aim to provide equal opportunities to all job applicants and employees and no prejudice or discrimination in the treatment of our people, including in hiring, compensation and training, will be tolerated.

We expect you to treat everyone with respect and promote diversity in our work environment. Any kind of discrimination, humiliation, intimidation, exposure to ridicule, hostility and embarrassment in our work environment, whether based on race, social status, nationality, religion, age, retirement, disability, gender, marital status, sexual orientation, health condition, pregnancy, union membership, political affiliation or other characteristics protected by law, will not be tolerated.

"Harassment": means any unwanted, inappropriate or unwelcome behavior in circumstances in which a reasonable person, taking into account all the circumstances, would have foreseen that the harassed person would be humiliated, intimidated or offended. It may include, but is not limited to: i) physical contact, jokes, insults or name-calling; ii) offensive suggestions or comments; iii) display of discriminatory or offensive images or words; iv) interference with personal property or equipment; and/or v) isolation.

Commitment to Our People

Harassment and Bullying: We aim to provide a working environment where everyone is treated with dignity, equality and respect at all times. As such, we will not tolerate any employee, independent consultant, supplier, visitor, customer or any other person in our workplace being subjected to or threatened by any form of: (i) physical punishment or abuse, (ii) bullying or harassment, including but not limited to sexual, physical and verbal harassment, (iii) intimidation, humiliation or degradation, or (iv) unjustifiable behavior by any individual or group that creates a risk to the health and safety of another worker, whether intentional or not.

Legitimate, reasonable and constructive criticism of an employee's performance or behavior or reasonable instructions given to employees during their employment will not constitute bullying in itself.

Health and Safety: we seek to promote a safe and healthy environment for our employees, suppliers, visitors, independent consultants, clients and society as a whole.

We expect you to follow all our health and safety policies and procedures. If you identify any situation that puts you or someone else at risk, you must report it to your manager, your Health and Safety or People and Culture departments (or the department responsible according to structure).

"Sexual harassment": consists of embarrassing and pressuring the victim with the real or apparent purpose of obtaining sexual advantages or favors, taking advantage of someone's influence or professional context, regardless of position or function (e.g. telling jokes, showing photos/images and sending messages with obscene or sexual content, making comments of a sexual nature about someone's appearance, imposing sexual favors as a condition for a promotion or to avoid threats of dismissal).

Commitment to Our People

Similarly, if you are in a situation where you think there is a risk to your health and safety, you must exercise your right of refusal and immediately inform your manager, your Health and Safety or People and Culture departments (or the department responsible according to structure).

Alcohol Drugs and weapons: we are committed to the safety, health and well-being of all our employees and stakeholders. Under no circumstances are you allowed to work under the influence of alcohol or drugs. Only at formal, authorized work events or when representing Chlorum at external events, such as a June party, plant opening, year-end party, are you allowed to consume alcohol moderately and responsibly, if you so choose, and without putting your safety and the safety of others at risk. You may not smoke or use vaporizers on our premises, outside the designated smoking areas. The possession, purchase or sale of drugs is also prohibited on Chlorum Group premises.

You are not permitted to store or carry any type of weapon on our premises or when representing the Chlorum group, unless this is a fundamental part of your role and you have the necessary permission to do so.

"Workplace" includes offices, client premises, work-related functions such as employee parties or cocktail parties, external conferences or client events.
"Unjustifiable behavior" means behavior that a reasonable person, taking into account all the circumstances, would see as unjustifiable, including behavior that is victimizing, humiliating, diminutive or threatening.

Commitment to our brand



Commitment to Our Brand

As our employee, you represent Chlorum. As such, we expect you to uphold the brand's reputation of Chlorum Solutions and all the Group's companies.

The following requirements represent the minimum practices and standards that we expect our employees to follow:

Public Relations: We have procedures in place to mitigate risk and identify/prevent possible breaches relating to the protection of the Chlorum Solutions brand and the brands of Group companies and we expect you to follow our internal policies and procedures.

As an employee you are expected to interact honestly, accurately and respectfully with all our stakeholders and you may not speak directly to journalists, media professionals or in any other forum on behalf of the Chlorum Group without the prior permission and guidance of our Legal Department or Communications Department.

In the following situations, you must also obtain prior permission from the Legal or Communications Department and your manager: (i) if you participate in benchmarking meetings or meetings of trade or industry associations with our competitors, (ii) if you want to include, or someone asks you to include, Chlorum information in a lecture or scientific paper, congress or any form of presentation to external stakeholders; (iii) participation in any public event / interaction on behalf of Chlorum or a Group company.

Commitment to Our Brand

Social Media: You may not publish any content on any social media platform about Chlorum without prior permission and guidance from your manager and the Communication Department, unless the publication is part of your role as a Chlorum employee or has been designed by the responsible departments to be shared freely by any employee.

As a Chlorum employee, when online, you must comply with all Chlorum policies, including policies on confidentiality, data protection/privacy and intellectual property. When posting content in your personal capacity, you are expected to make it clear that you are not speaking on behalf of Chlorum or any of the Group's companies, unless authorized to do so. We also expect you to always act with discretion and exercise good judgment on social media, always interacting with others in a lawful and respectful manner.

**Commitment to our
information and assets**



Commitment to Our Information and Assets

The following are the practices and minimum standards that we expect our employees to follow with regard to our information and assets:

Preservation and Proper Use: You are responsible for your workplace and for the proper use of the Chlorum assets and resources at your disposal, whether material or intellectual. The use of any of our assets or other resources, including any equipment and tools provided to you by Chlorum, especially those bearing Chlorum's brand elements (or the brand elements of any of the Group's companies), such as logos, fonts, colors, must be done with due care and must comply with the rules established by Chlorum.

All of Chlorum's electronic devices and systems must be used appropriately and must not be used for gaming, the exchange of illegal content or any other improper purpose.

Information and Intellectual Property: We comply with all applicable local and international laws, regulations and standards regarding information security, the use of confidential and privileged information, as well as intellectual property rights related to Chlorum's brand, trademarks, copyrights. As such, we have policies and procedures in place to mitigate risk and identify/prevent potential violations related to these issues and we expect you to follow these policies and procedures, including but not limited to each of the Chlorum Policies.

"Company assets": all assets owned, maintained or used by Chlorum, including, among others, materials such as real estate, furniture, vehicles, systems, equipment, utensils, devices, documents, raw materials, products, financial resources (such as company time), information conceived or developed at work, information system and intellectual property.

Commitment to Our Information and Assets

- i. **Misuse of Inside Information:** As a Chlorum employee, you may have access to confidential or restricted Chlorum information. You may not intentionally or unintentionally use for your own benefit or that of a third party any Chlorum information, or any other confidential or restricted information to which you have had formal or informal access in the course of your employment.
- ii. **Information Security:** As an employee, you are responsible for complying with Chlorum's policies and procedures and ensuring that third parties contracted by you also comply when processing, copying, collecting, transferring, sharing and working with data, including personal information or confidential information. This rule covers information written or stored on our electronic systems and any other associated media (such as pen drive, external disk, virtual storage, CD/DVD and others).

"Confidential information": means any information, events or circumstances related to the business or relations with Grupo Chlorum, to which the employee has had access during the performance of his/her duties or to which the supplier or partner has had access during the contractual relationship.

"Inside Information": means any information that has not yet been disclosed or that has been partially disclosed, therefore Inside Information and/or Insider Information may not be used by employees or Third Parties under any circumstances, even after termination of employment or contractual relationship with the Chlorum Group.

Commitment to Our Information and Assets

A non-inclusive list of rules and behaviors that contribute to keeping Chlorum's information secure includes:

- Do not use any electronic system to share confidential Chlorum information, unless you have authorization to do so for professional purposes and there is a non-disclosure agreement in place as required.
 - Take care when creating or sending any commercial records, ensuring that this is done safely.
- Comply with all of Chlorum's records management policies, including those related to the classification and retention of documents.
 - Do not, under any circumstances, give anyone undue access to information, tools or resources under your control or responsibility. In this regard, you must use formal communication channels when doing business. For example, you should use secure emails from your Chlorum account during discussions regarding contract negotiations with suppliers, rather than communicating via WhatsApp or other similar means of communication.
 - Do not share, except with prior written consent to do so, access to your individual professional e-mail box with any other employee or third party.
 - Do not use the credentials (e.g. logins, passwords or ID badges) of your colleagues. This data is personal and/or confidential and non-transferable and therefore each employee is responsible for its custody, confidentiality and maintenance.

Commitment to Our Information and Assets

- Lock your computer whenever you leave your workstation, so that others can't access information on your computer.
- Do not install any software on your work computer, including "pirated", portable or executable software or freeware. Any software installed on your work computer must be approved and installed by Chlorum's technology team.

Conflict of Interest: A Conflict of Interest is a real or apparent conflict that may arise when your personal, family, social or political activities and relationships interfere or have the potential to interfere with your responsibilities and duties to Chlorum.

You must avoid any real or apparent Conflict of Interest between your personal interests and the interests of Chlorum and must not use your position to gain undue advantage or benefit, directly or indirectly, for yourself, any other business or person related to you or any other third party.

Common examples of conflicts of interest may include:

- Have another occupation outside of your role at Chlorum that negatively affects your performance or interferes with their work as a Chlorum employee;
- Serving as a member of the Board of Directors of any organization or working as a consultant, advisor, manager or officer of any organization without seeking prior approval, as instructed by Chlorum's conflict of interest policy;

Commitment to Our Information and Assets

- Using confidential or privileged information for your own benefit or that of a third party;
- Receiving any personal benefit from a supplier, client, competitor or any other organization;
- Hiring a supplier in which you have an undisclosed direct or indirect financial interest;
- Hiring or having a direct or indirect line of communication with a relative or someone with whom you have an emotional relationship;
- Engaging in or doing activities that compete, or have the appearance of competing, with Chlorum's interests;
- Not keeping your personal political activities separate from your activities at Chlorum, including using Chlorum assets and resources and providing direct or indirect political contributions to do so;
- Fail to immediately report any real or apparent Conflict of Interest that you have identified.

Travel, Meals and Other Expenses: Travel, meals and other expenses necessary to carry out your professional activities must be properly approved, have a business purpose, comply with our policies and procedures and may not be characterized as a real or apparent conflict of interest or occur in exchange for an improper advantage.

Commitment to Our Information and Assets

Gifts, Presents and Other Offers: Gifts, presents and other offers between Chlorum and suppliers and customers, such as any form of entertainment or hospitality, must be appropriate and of reasonable value (i.e. they must not be excessive in the circumstances and must comply with the defined limit of BRL 350.00 (three hundred and fifty reais)), have a legitimate business purpose, must not be frequent and must comply with our policies and applicable local laws. Under no circumstances should these offers be intended or appear to influence any kind of decision-making by Chlorum and/or our suppliers and customers.

You may not provide gifts, presents or other items to Public Officials without prior written approval from the Ethics & Compliance Committee.

If you work in the Purchasing department or are directly responsible for contracting a supplier and/or service provider you must advise suppliers not to offer gifts, presents, travel, entertainment and hospitality and you may not, under any circumstances, accept any gift, present or any other offer from suppliers. Should this occur, you must respectfully return the gift to the supplier, raffle it off to charity or share it among your colleagues, as appropriate.

Commitment to Our Information and Assets

Hiring Suppliers: We expect you to follow our internal policies and procedures to protect Chlorum's values, interests and image when hiring a supplier. You must comply with labor laws, practices and standards and Third Party Procurement and Audit policies and procedures.

The same conditions apply if you wish to hire a former employee or service provider as a supplier. You can hire a former employee if the applicable local laws are respected and the former employee has not been dismissed for just cause or for issues unrelated to Compliance, and only after consulting their former manager and the People and Culture department.

Our suppliers are expected to operate ethically and in accordance with the Supplier Code of Conduct and all applicable laws and regulations, including anti-corruption laws. As such, we expect you to report any situation of possible violation of the Supplier Code of Conduct by one of our suppliers. These reports will be evaluated and the names of those making the complaint will be kept confidential to the extent permitted by law.

As a Chlorum employee, you must continuously work to integrate suppliers efficiently into our value chain, managing ethical and fair business relationships and encouraging them to be part of our company's improvements and developments.

Commitment to Our Information and Assets

Accounting Books and Records: We are committed to ensuring that all assets, liabilities, transactions and other activities of Chlorum with actual or potential financial impact are recorded in reasonable detail to enable the transaction to be identified, as well as correctly and faithfully reflected in the books, records and respective accounting periods, in accordance with all applicable legal and accounting requirements.

You are responsible for ensuring that any Chlorum documents produced under your responsibility, especially financial reports and certifications based on them, meet these requirements and are maintained in compliance with our internal policies and procedures, local laws, practices and standards. If necessary, you must assist all internal or external audits, internal or external investigations or requests from the Legal Department (e.g. regarding participation in a government investigation or lawsuit).

Fraudulent Behavior: Misuse of Chlorum's assets, information and resources is unacceptable and may be considered fraud if any employee intentionally alters, omits, manipulates or falsifies any information or situation, resulting in an unfair and/or illegal advantage or disadvantage of any kind.

Examples of fraud include, among others:

- deliberate falsification or tampering with accounting books and records, as well as other documents;
- signing documents without authorization or power of attorney;
- personal use of Chlorum's financial resources;
- presentation of invoices, receipts and vouchers that do not correspond to the services provided or contracted;
- providing false information about hours worked in order to receive a higher salary or avoid disciplinary action for unethical reasons;
- presentation of false medical certificates.

**Commitment to our
stakeholders**



Commitment to Our Communities

At Chlorum, our ambition is to innovate and promote a positive social, economic and environmental impact for all our *stake holders*:

Environment and Sustainability: we are constantly looking for ways to reduce our environmental impact and help our suppliers, communities and other third parties to do the same.

As a Chlorum employee you must always: (i) comply with all applicable environmental laws and regulations, (ii) comply with all internal policies and procedures relating to environmental care; (iii) ensure that processes are in place so that we have all the necessary permits to operate (iv) ensure that proactive measures are adopted in our operations to reduce our impact on the environment and natural ecosystems, (v) ensure clean and non-polluting production processes, making proper use of resources in a sustainable manner, eliminating and/or reducing risks that may negatively impact the environment through environmental management that meets current regulations and is consistent with the Chlorum group's environmental conscience in mercury-free and low-carbon production.

Relationship with our Communities: We are committed to the empowerment of our communities located around the world. As a Chlorum employee, you should contribute to the implementation of projects and strategies that improve the well-being of these communities, if appropriate and as part of your role.

When working with local communities, you must also comply with all our internal policies and procedures and ensure that the rights of these communities are respected with the socio-environmental impacts of our business.

Commitment to Our Communities

Commitment to shareholders: as a Chlorum employee, you must always aim for profitability of operations, in a sustainable way over time. Creating value for your shareholders is the focus of our activities. The clarity, truthfulness and speed with which all information about our activities is provided to our shareholders is also our obligation.

Commitment to customers: as a Chlorum employee, you must always guarantee the long-term satisfaction of our customers and their needs, by supplying products of the highest quality and with guarantees of conformity, excellence in service at all stages of the business relationship and, above all, safety, in a form of bonding and closing business that complies with the standards of ethical business conduct.

Commitment to ethics and our business



Commitment to Ethics and Our Business

You will conduct your activities on behalf of Chlorum with transparency, integrity and commitment to the highest standards and practices of ethical conduct and must not engage in illegal activities or conduct.

We recognize and comply with the laws in all the regions/countries in which we operate. Therefore, this Code will not differ from local laws. In case of inconsistency, you will comply with the standards of this Code only if they are more demanding than the applicable laws and regulations.

If you have any questions or are unsure which laws apply to you and your location, please contact the Legal Department for help.

The following requirements represent the minimum practices and standards that we expect our employees to follow:

Compliance with anti-corruption laws: We have a zero tolerance policy for any form of public or private corruption, including, but not limited to, bribery, embezzlement, extortion, illegal agreements and facilitation payments made by our employees or third parties in the conduct of our business.

You will comply with all applicable local and international laws, regulations and standards relating to anti-corruption issues where we do business, including the Brazilian Clean Company Act and the Foreign Corrupt Practices Act (FCPA). These requirements are addressed in Chlorum's anti-corruption policy.

"Bribe": means any offer, promise or authorization of payment related to any incentive to any Public Official or person related to them, including any natural or legal person from the private sector, if the incentive is intended to influence the beneficiary to misuse their position or duty to obtain or maintain an undue commercial advantage for their own benefit or that of a third party.

Commitment to Ethics and Our Business

As an employee or with or through any third party acting on behalf of Chlorum, you are prohibited from participating in any corrupt activity and from offering, promising, providing or authorizing, directly or indirectly, any person to give money or any item of value to a Public Official or any private individual or entity in order to obtain or keep any undue advantage.

Relationship with Public Officials: You must follow our internal policies and approval requirements when providing any item of value to Public Officials on behalf of Chlorum. An "item of value" includes, but is not limited to, the provision of gifts, presents, travel, entertainment, employment and other offers.

Current or former Public Officials will only be hired if local laws and regulations have been strictly followed (including, but not limited to, the mandatory quarantine period), the necessary approvals have been obtained and there is no real or apparent Conflict of Interest. In addition, before hiring Public Officials, you should consult the Ethics & Compliance Committee.

"Facilitation Payments": these are payments of nominal value to Public Officials in a lower hierarchical position to speed up a judicial or administrative process to which a Group company may be a party or to "facilitate" routine government actions over which the Public Officials have no discretionary power. Examples of routine non-discretionary actions may include providing police protection, granting licenses, permits or public services or customs clearance services.

Commitment to Ethics and Our Business

Public Tenders and Competitive Bidding: as a Chlorum employee you must be aware of and follow the principles below when dealing with tenders:

- preventing, disturbing or defrauding the performance of any act in public tenders;
- defraud, drive away or seek to drive away competitors;
- creating, in a fraudulent or irregular manner, a legal entity to participate in a public bidding process or enter into an administrative contract, as well as removing or seeking to remove a bidder, by means of fraud or offering an advantage of any kind;
- fraudulently obtaining an advantage or benefit from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public bid invitation or in the respective contractual instruments;
- pay, offer, authorize and/or promise (directly or indirectly) any amount of money, goods of value or undue advantage to any client (public or private), so we must win business on the strength of our technology and team;
- combining prices with competitors, dividing operating regions, altering bidding results or using questionable information to obtain competitive advantages.

Commitment to Ethics and Our Business

Compliance with Anti-Money Laundering Laws: We comply with all local and international anti-money laundering laws, regulations and standards applicable to the regions/countries where we operate and have procedures in place to mitigate the risk of money laundering activities and to identify and prevent any irregularities.

All our employees must strictly comply with all laws and regulations relating to this issue and act in such a way as to effectively prevent and monitor the direct or indirect occurrence of these practices in the Chlorum business chain.

You should look out for warning signs such as:

- purchase requests that are not in line with the supplier's normal commercial activity;
- requests for large payments in cash or other unusual means of payment;
- cash transfer request.

International Trade: We comply with the laws that regulate trade and the sanctions that limit our ability to do business with certain countries, companies and individuals.

Our role:

- we comply with trade regulations in the markets in which we do business;
- we comply with all import and export laws governing the transfer of equipment and products, information, technologies and services, including licensing and customs requirements.

Commitment to Ethics and Our Business

Compliance with Data Protection Laws: We comply with the Brazilian Data Protection Act and are committed to complying with the principles applicable to the protection of personal data in accordance with that law.

We will only use personal data in accordance with the legitimate purpose for which it was obtained and applicable privacy notices. You are responsible for complying with all of Chlorum's data protection and confidentiality standards, observing all applicable local laws, regulations and international standards, honoring privacy and keeping secure the personal data to which you have access in the course of your work.

Compliance with Antitrust Laws: We comply with fair competition laws as we conduct our business ethically and do not use unfair practices to win any business and seek to promote free competition in the markets where we operate. As such, we condemn and seek to prohibit any anti-competitive conduct and abusive practices that may constitute economic violations and/or unfair competition, always seeking to be transparent and fair.

Violations of antitrust and fair competition laws can result in severe penalties for Chlorum and our employees.

Commitment to Ethics and Our Business

As a Chlorum employee, you must:

- Comply with all applicable fair competition and antitrust laws;
- Use legitimate means to obtain information about our competitors;
- Respect the confidential information and intellectual property rights of our competitors and other Third Parties; and
- Obtain the approval of the Legal Department in the case of corporate operations (e.g. incorporations, acquisitions and joint ventures, other associated contracts).

Third Party Audit: When contracting or renewing a contract with a supplier or third party, you must conduct a third party audit when required by Chlorum's risk assessment policy or process, to ensure that the supplier or third party is not engaged in illegal behavior or actions that violate Chlorum's Supplier Code of Conduct.

Subject to risk assessment, due diligence must also be carried out as part of any investment proposal or initial acquisition or decision to identify any apparent significant exposure to bribery-related risks.

**Ethics and Measures
Disciplinary**



Ethics and Disciplinary Measures

You are expected to ask questions, raise concerns and report, in good faith, any suspected irregularities related to the principles of this Code to your direct supervisor, the Ethics and Compliance Committee, the People and Culture department, the Speak Up Channel, management, as well as encourage your direct reports to speak up.

The speak up channel will be the main communication tool for stakeholders of the Chlorum group to send complaints, reports of attitudes and actions that go against the ethical principles and values and the rules of conduct of the Chlorum group established in this Code.

Chlorum's Speak Up Channel guarantees the security, confidentiality and preservation of the identity of all complainants to the extent permitted by law. Retaliation of any kind against a complainant or those involved in an investigation is not permitted. All information will be shared only as required by law.

The results may be shared with the parties involved, when deemed applicable and as required by law. If relevant and appropriate, investigations may be carried out by third parties.

Violations of the principles set out in this Code may result in disciplinary action, including, but not limited to, verbal and written warnings, temporary suspensions and termination of employment, depending on the seriousness of the violation. False reporting of violations may also result in disciplinary action.

Ethics and Disciplinary Measures

If the alleged violations constitute a crime, the relevant authorities will be notified, without prejudice to the other results described above.

The speak up channel is available to all employees of the Chlorum group, customers, suppliers, service providers, investors and administrators 24 hours a day, 7 days a week, either to report a new case or to follow up on the progress of a previous complaint.

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This Code is not intended to cover all the situations that can occur in day-to-day work. It is also a constantly evolving document that will be updated whenever necessary. Suggestions and feedback on improvements are welcome and can be made through our channel (<https://my.safe.space/chlorum>) or directly with the Ethics Committee.



Ethics Committee

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