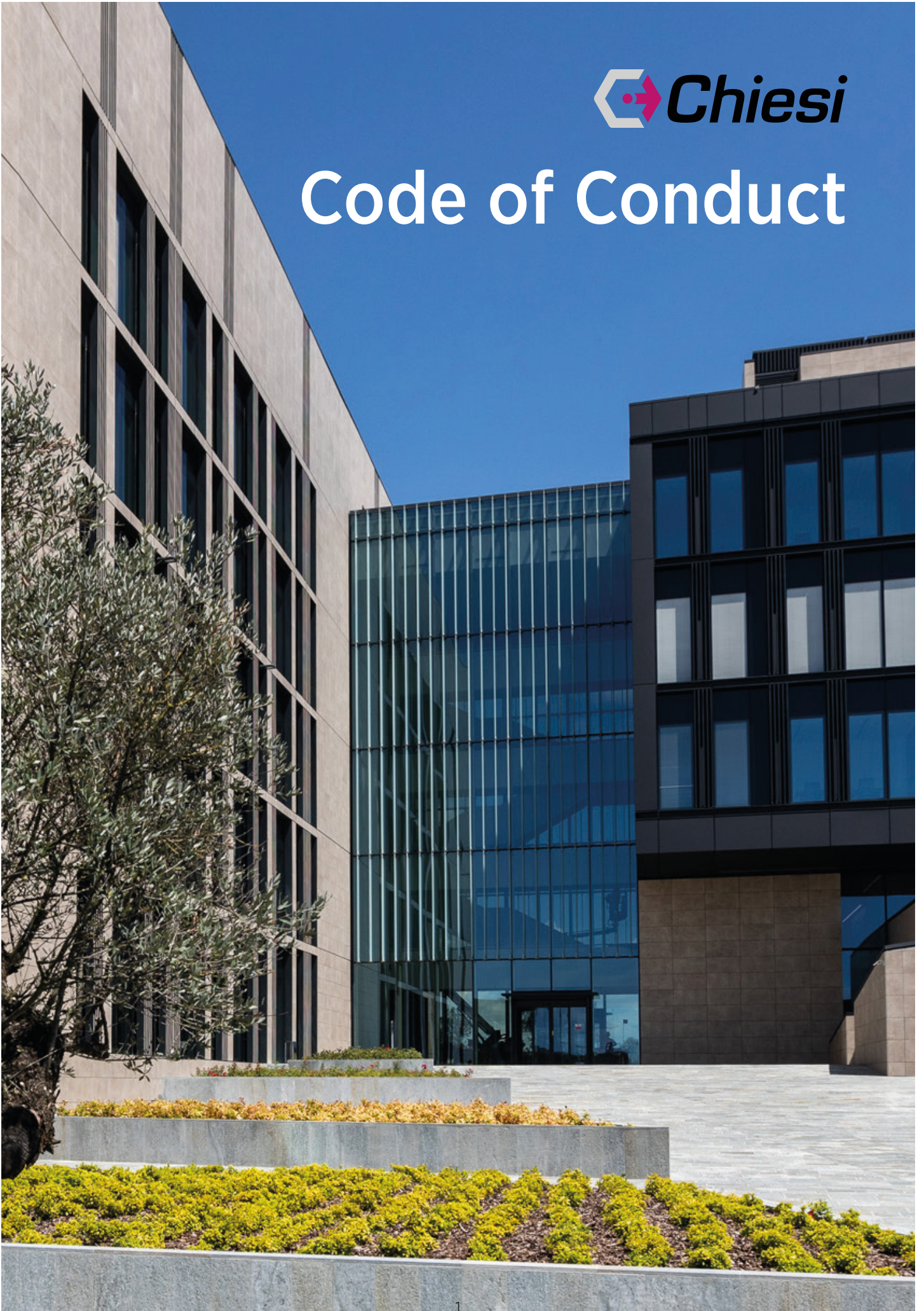




# Code of Conduct



# Code of Conduct

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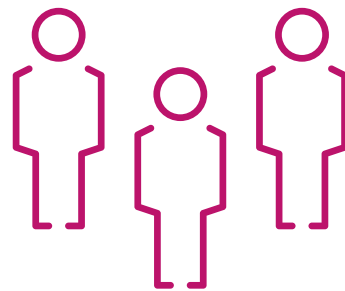
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# Our Mission



**Our aim** is to be recognised as a research-focused international Group, able to develop and commercialise innovative pharmaceutical solutions to improve the quality of human life.

**We wish** to maintain a high-quality entrepreneurial team characterised by self-confidence and a collaborative spirit.



**Our goal** is to combine commitment to results with integrity, operating in a socially and environmentally responsible manner.

# This is us – our values

Our values represent the distinctive elements of our culture. They express our uniqueness and define how we do things at Chiesi.

The values are Chiesi language, the footprint we leave in everything we do.

Our behaviour represents how we act and expresses our values in actionable, observable and concrete ways.



# Bringing values to life: Code of Conduct

Our values serve as the starting point for defining the rules of conduct that we must follow and respect when carrying out our activities at Chiesi. These rules are outlined and expanded upon in this Code of Conduct, with each of them deriving from one or more of our values. Therefore, each of us has the responsibility to understand and apply this Code, to personally contribute to perpetuating our values and our commitment to the people and environment around us, as well as to maintaining our good reputation.

*This is us*

**WE INTERACT WITH INTEGRITY AND TRUST**

- We show consistency between words and actions leading by example
- We build trust-based relationships through respect, honesty and authenticity
- We have the courage to speak up and express our point of view openly and in a constructive way
- We respect all individual characteristics, welcoming and valuing diversity, uniqueness and authenticity
- We act ethically and with integrity

**Chiesi**

*This is us*

**WE UNLOCK OUR POTENTIAL TO IMPROVE AND DEVELOP**

- We share and leverage lessons learned to improve and progress continuously
- We are accountable for our own professional and personal development and results
- We listen to each other, with openness and genuine curiosity, welcoming feedback
- We are committed to fostering each other's talent and skills, encouraging people to express the best of themselves
- We welcome change as a continuous development opportunity

**Chiesi**

*This is us*

**WE COLLABORATE AS AN INCLUSIVE TEAM**

- We ask "what do you think" and value everyone's perspective and contribution when working together
- We collaborate with others across the organization to achieve common objectives
- We demonstrate empathy putting ourselves in each others' shoes
- We create a positive environment where people feel comfortable to express themselves and collaborate
- We celebrate success based on teamwork

**Chiesi**

*This is us*

**WE GENERATE INNOVATION AND VALUE PUTTING THE PATIENT FIRST**

- We take responsibilities and risks in looking for new challenges and opportunities, leveraging on our entrepreneurial spirit
- We listen to the voice of patients and their needs to create the best solution for them, their families and HCPs
- We innovate and challenge the status quo leveraging our creativity, competencies and intuitions
- We pursue excellence to ensure the highest quality in our results and products
- We put passion and heart in our job to compete with the best and win our challenges

**Chiesi**

*This is us*

**WE ACT AS A FORCE FOR GOOD**

- When we make decisions we understand the need to create value both for the business and the society
- We take care of each other because we know we are all responsible for each other's well being
- We allocate resources, effort and energy to preserve the environmental balance
- We collaborate to improve our local community through mutual solidarity
- We generate ideas to make the world feel better

**Chiesi**

# Our Responsibilities

**Knowing and recognising our values and acting in accordance with them:** the Code of Conduct is the reference tool that guides our daily activities and helps us all to act with integrity following the Group's ethical principles.

## REPORTING

**Expressing our doubts:** if we are uncertain about our conduct, it is essential that we share our concerns with our line manager, our colleagues in Human Resources or the Compliance department.

**Whistleblowing:** it is everyone's duty and responsibility to promptly report if we believe someone is violating a law or Company policy or engaging in behaviour contrary to the values expressed in the Code of Conduct. Chiesi has adopted a Group whistleblowing system ("SpeakUp&BeHeard") that warrants the highest level of confidentiality and protection of the reporters' identity.

Chiesi prohibits any form of retaliation and protects those making reports from retaliation after they have made a report in good faith and/or based on a reasonable belief.

### Reference documentation

- *Group Guidelines on the use and management of SpeakUp&BeHeard*

## VALUE CHAIN

Recognising the interdependence between the Company's activities and the ecosystem of which it is part, Chiesi strives to work with business partners who share the same values and commitment to high ethical standards, operating responsibly from a social and environmental perspective.

Chiesi is also committed to full compliance with the laws, rules, regulations, and its principles and policies governing its activities.

To reinforce principles, standards and behaviours to which it is committed, in 2019 Chiesi developed the Code of Interdependence (a code of conduct for Chiesi third parties). Developing the provisions of this Code of Conduct and together with the Group Anti-Bribery Policy, Chiesi has expressed the principles on which it intends to base its interactions with third parties, suppliers, partners and with its entire value chain.

### Reference documentation

- *Group Code of Interdependence - Suppliers Code of Conduct*
- *Group Anti-Bribery Policy*

## CREATING SHARED VALUE

For Chiesi, creating shared value is a guiding principle. Shared value is created when both social challenges and business opportunities are addressed together: in this way the Company's success becomes a driver for societal progress.

This approach is intrinsic to the Chiesi's mission and values. It stems from the firm belief that the Company has a social role and acts as a promoter of shared wellbeing in society, by prioritizing integrity, ethics, and responsibility to stakeholders, including patients, employees, the environment, communities, partners, and shareholders.

To reinforce and integrate this commitment into its business model, the Company has adopted the legal form of Benefit Corporation where available, according to national laws. Additionally, all subsidiaries are committed to conducting business in a manner that positively impacts society and future generations and, even in the absence of local Benefit Corporation laws, the Group has decided to integrate common benefit purposes into the articles of association of Chiesi's affiliates.

Chiesi people are inspired by this guiding principle and encouraged to seek innovative approaches that drive meaningful change and extend positive impacts beyond our organization's boundaries, benefiting all stakeholders.

# Our Commitment

## TO PATIENTS AND THE SCIENTIFIC COMMUNITY

### RESEARCH AND DEVELOPMENT

Chiesi is committed to developing and manufacturing innovative, high-quality, reliable, and safe therapeutic solutions that improve patients' well-being and provide real benefits to the healthcare system.

Research and Development at Chiesi is managed in accordance with sound ethical principles, safeguarding the values of honesty and integrity. We strive to remain constantly up-to-date, in an effort to ensure maximum reliability for our customers in compliance with applicable standards.

Respect for these values and ethical principles allows Chiesi to create innovation while guaranteeing the highest quality for its products. To ensure the sustainability within the entire R&D process, Chiesi has developed a Life Cycle Perspective tool that allows to assess the environmental impact of products at all stages of development, from pre-clinical research to industrialisation.

Quality culture entails the mindset and behaviour required to consistently perform the activities in design and execution of quality management principles. The Global Quality Management System at Chiesi is based on a combination of international GxP regulations and ISO principles, supporting the continuous improvement of activities, processes, and products.

In carrying out non-clinical and clinical research activities, Chiesi requires all Chiesi people, business partners, and anyone who acts on behalf of Chiesi or for Chiesi to always respect the scientific principles of transparency, independence and accessibility of data. This includes compliance with relevant regulations and best practices, such as Good Laboratory, Good Clinical, and Good Manufacturing Practices, as applicable. Qualification of all Chiesi people involved in R&D activities is guaranteed by adequate training programmes.

#### Reference documentation

- *Quality Policy Chiesi Group*
- *Chiesi Global Quality – R&D Quality Management System principles*



## **ANIMAL WELFARE**

Chiesi is committed to limiting animal testing. It is only carried out when there are no viable alternatives to ensure the safety and efficacy of its products, and when animal testing is required by regulatory authorities to obtain authorisation to proceed with human studies or for product approval.

At the same time, Chiesi supports the advancement of alternative methods to animal testing, while always ensuring maximum efficiency and product quality for patients.

When conducting tests on animals, Chiesi strictly adheres to all applicable legislation and to the rules set by international guidelines as well as internal principles and procedures to ensure that the highest welfare standards are met.

## **SAFETY AND QUALITY OF OUR PRODUCTS**

Chiesi is committed to offering high-quality products that meet both regulatory and safety requirements. We hold our suppliers and business partners to the same standards, ensuring excellence along the supply chain.

We are dedicated to tracking and analysing all relevant safety and quality information in a transparent and timely manner, in full compliance with applicable laws and best practices. To this end, Chiesi has implemented a pharmacovigilance system to ensure that all information regarding the benefit-risk ratio of its medicinal products is continuously updated and evaluated.

To safeguard patient safety and take appropriate actions, Chiesi requires all Chiesi people to report any information on adverse events related to the use of the Company's products of which they might become aware. This ensures appropriate analysis and data management following the approach set by the Global Pharmacovigilance function.

## INTERACTIONS WITH PATIENTS AND PATIENT ORGANIZATIONS

Chiesi is committed to fostering meaningful partnerships with patient communities worldwide.

These partnerships play an essential role in helping us to better understand the experience of living with a disease, the challenges faced by patients and their families, and the key role that timely and equitable access to treatment plays in achieving a better quality of life.

Chiesi is dedicated to ensuring that the values of integrity, independence of all parties, respect, equity, transparency and mutual benefit are reflected in all engagements with the patient community.

When interacting with patients and patient organisations, Chiesi people must act professionally and ethically, in accordance with the applicable legislation and the rules set by industry codes, as well as internal rules, principles and procedures (including those relating to qualification, engagement and hospitality) that reflect the highest industry standards.

Chiesi prohibits any form of interaction that is aimed at obtaining an improper advantage or at improperly influencing any decision.

### Reference documentation

- *Chiesi Group Guidelines on Interactions With Healthcare Professionals And Organizations, Patients And Patients Organizations*
- *Chiesi Group Anti-Bribery Policy*

## RELATIONS WITH THE SCIENTIFIC COMMUNITY

Chiesi is committed to collaborating with the scientific community through a continuous exchange of knowledge, for the benefit and improvement of patients' health and to collect precious feedback and suggestions on Chiesi's products. This includes both products already on the market, since there is a continuous need to collect more evidence on them, and particularly those still under development, thus promoting constant scientific progress.

When collaborating with the scientific community, Chiesi people must comply with the principles of transparency, independence, objectivity and traceability, in accordance with the applicable legislation and the industry codes adopted by the major pharmaceutical associations. These principles are reflected in the Chiesi Group and local procedures on interactions with healthcare professionals and healthcare organisations.

Chiesi prohibits any form of collaboration that is not substantiated by objective criteria, including the scientific expertise of the consultant and the legitimate needs of Chiesi.

### Reference documentation

- *Chiesi Group Guidelines on Interactions With Healthcare Professionals And Organizations, Patients And Patients Organizations*
- *Group Anti-Bribery Policy*

## INFORMATION, PROMOTION, ETHICAL MARKETING AND USE OF SOCIAL MEDIA

Chiesi is committed to disseminating any relevant information about the Company, its products and its activities through the appropriate channels and in accordance with ethical marketing principles and the rules governing the pharmaceutical sector. This includes guidelines relating to scientific information, the promotion of medicinal products, fair competition and the use of social media.

The Company requires Chiesi people to adhere to internal rules and processes on the approval of any materials affecting Chiesi, its products and activities to guarantee fair, compliant, responsible and transparent information, in accordance with ethical marketing standards. This includes providing accurate and balanced information about medications, prioritizing patients' and consumers' welfare, and avoiding misleading claims.

Chiesi has adopted a Group Guideline on the Use of Digital Channels with a set of principles and rules on how to act on social media when referring to the Company, its products and activities.

Additionally, Chiesi has issued specific guidelines on sustainability claims, which in particular prohibits the use of exaggerated and/or misleading information about the environmental and/or social benefits/impact of a product, service, process, brand or business.

### Reference documentation

- *Guidelines on the Use of Digital Channels*
- *Greenwashing/Social Washing guidelines*

# Our Commitment

## TO THE PLANET

Chiesi recognizes the importance of maintaining an ecological balance in our planet's natural environment and of preserving natural resources to support the wellbeing of current and future generations. By embracing the "do not harm" principle, our commitment in this area is to protect our planet and minimize any negative impact produced by our activities, lowering the environmental impact of our products and activities by reducing the consumption of resources, improving the efficiency of production processes, and collaborating with partners guided by the same values and commitments.

The Company encourages Chiesi people to minimise the consumption of raw materials, dispose of waste in a way that can be recycled, and use natural resources efficiently, both in their work and in their daily lives.

To this end, Chiesi strives to raise awareness among the employees about the importance of protecting the planet, its natural resources, and all living beings.

## CLIMATE ACTION

Chiesi is actively engaged in the fight against climate change. In particular, the Group conducts climate change risk assessments, measures the greenhouse gas (GHG) emissions generated by its business operations and along its entire value chain, defines objectives based on scientific criteria, and structures its governance system to ensure the achievement of these objectives.

We have made a formal pledge to reduce our GHG emission, reaching Net Zero by 2035, in advance of the Paris Agreement recommendations, and to measure progress towards this goal.

### Reference documentation

- *Climate Transition Plan*
- *Sustainability Report*

## RESPONSIBLE CONSUMPTION AND PRODUCTION

Chiesi has recognised the need to move away from the linear consumption model of production, which is based on the 'take, make, use, dispose' approach. Instead, the Company aims to embrace the paradigm shift towards a circular system that creates virtuous loops, maximising the lifespan of resources across value chains, while reducing waste production and environmental impacts.

Chiesi is committed to implementing waste management and air quality control programmes within its facilities. In this framework, Chiesi also encourages sustainable mobility practices, in order to lower greenhouse gases (GHG) emissions related to mobility, implementing initiatives for car fleet, business travel and employee commuting.

### Reference documentation

- *Sustainable Chemistry Policy*
- *Human Transportation Policy*
- *Sustainability Report*

# Our Commitment

## TO PEOPLE

### HUMAN RIGHTS

Chiesi condemns and prohibits any act that violates human rights and, more specifically, any form of discrimination, harassment, abuse, child labour and forced/ compulsory labour.

Chiesi promotes any initiative and action aimed at enforcing and progressing with the respect of human rights and specifically warrants freedom of association and commits to observing compliance with international standards and all applicable laws related to fair wages, remuneration, working hours and rest periods.

Chiesi guarantees the highest standards of health and safety at the workplace and aspires to warrant psychological safety and life harmony.

Chiesi has adopted a Human Rights Policy, applicable throughout the Group, which aims at providing Chiesi people with a set of principles, responsibilities, and commitments in relation to Human Rights.

Chiesi requires all Chiesi people and partners, in the context of their roles and responsibilities, to follow the Human Rights Policy in all its parts and act responsibly, applying, strictly respecting and enforcing the procedures and standards adopted.

Furthermore, Chiesi asks its suppliers to promote the implementation and respect of human rights by committing themselves to inspiring their conduct to the principles and statements of the Chiesi Group Code of Interdependence.

#### Reference documentation

- *Group Human Rights Policy*
- *Group Code of Interdependence - Suppliers Code of Conduct*
- *Manifesto against Hostile Behaviour, Violence and Harassment at Work*

## DIVERSITY AND INCLUSION

Chiesi is committed to respecting all Chiesi people for their contribution and for expressing their point of view, as the Company believes that differences among people represent an added value. Furthermore, different perspectives and experiences improve chances to understand problems, discover opportunities, and make better decisions for the common benefit of business and society together.

Chiesi ensures that all minorities and differences are respected, considered, welcomed and valued. Chiesi promotes teamwork and shared efforts in the interest of the business and the society.

Therefore, Chiesi has a zero-tolerance approach towards any kind of discrimination based on ethnicity, sexual orientation, gender identity, socio-economic status, age, physical abilities, religious beliefs, political beliefs, mindset, lifestyle, and other invisible diversity.

This applies to Chiesi people, suppliers, and collaborators.

In relation to this, a global policy on diversity and inclusion has been adopted, to be applied throughout the Group, aiming to provide a set of principles, responsibilities, and commitments that all recipients of this Code are requested to respect.

### Reference documentation

- *Global Diversity & Inclusion Policy*

## PEOPLE WELLBEING AND DEVELOPMENT

Chiesi is committed to taking care of people's wellbeing by fostering a positive workplace and way of working inspired by high standards of inclusiveness, work-life harmony and attention to personal and professional development.

To achieve this objective, Chiesi has defined and adopted a Human Leadership Model, inspired by the concept of sustainable leadership and by a high degree of "Share" and "Care". Chiesi has also implemented a Global Wellbeing Strategy, striving to guarantee Chiesi people a welcoming, safe, and stimulating working environment. This strategy focuses not only on safety and physical health but also on the emotional and psychological aspects, with the aim of consolidating a harmonious work environment.

### Reference documentation

- *Chiesi Global Wellbeing Guidelines*
- *Chiesi Global Learning Guidelines*



## COMMUNITY ENGAGEMENT AND DEVELOPMENT

Chiesi is committed to promoting sustainability, equity and prosperity in the local communities and places in which it operates, to contribute to long-term and sustainable wellbeing by:

- ◆ supporting and educating people to take care of their health and of the environment
- ◆ deploying resources and skills to foster the social, cultural, economic and environmental development of local communities
- ◆ helping those in emergency situations in the Group's countries of reference.

Chiesi promotes this kind of activities through various initiatives among which:

- ◆ corporate volunteering by engaging Chiesi people in activities that meet community needs and support local non-profit organizations
- ◆ donations and sponsorships for social purposes.

### Reference documentation

- *Sustainability Report*

## PROTECTION OF PRIVACY AND PERSONAL DATA

Chiesi is committed to handling personal data of Chiesi people, patients, healthcare professionals, and of all third parties with care and solely for legitimate business purposes, in accordance with applicable privacy laws and regulations, while also respecting the privacy rights and freedoms of individuals.

The processing of personal data is guided by principles of transparency, fairness, and accuracy. This entails collecting data based on legal grounds and ensuring that data subjects are fully aware of how their data is being processed.

Integrity and confidentiality are considered by Chiesi as fundamental pillars while processing personal data.

Chiesi has implemented technical and organisational measures aimed at detecting and mitigating the risks of personal data breaches. In case of security incidents involving personal data, Chiesi warrants full transparency and support to all the stakeholders involved, always prioritising the protection of individuals' rights and freedoms.

To guarantee the protection of data and freedoms of data subjects, Chiesi adheres to the principle of data minimisation. This means that data is retained only for the purposes for which it was collected and for no longer than is necessary to achieve those purposes.

Chiesi has put in place a qualification process to warrant that its business partners and service providers comply with data protection standards, also through specific contractually binding provisions. In addition, Chiesi performs audits and other assessments to verify their compliance with the above-mentioned requirements.

Furthermore, Chiesi conducts regular privacy and data protection training sessions to assess data protection knowledge and implements other activities aimed at enhancing awareness of privacy matters among Chiesi people and stakeholders.

### Reference documentation

- *Global Privacy Policy*

# Prosperity

## PROTECTION OF COMPANY INFORMATION AND ASSETS

Chiesi values, protects, and safeguards its assets – tangible, intangible, and financial – including its intellectual property rights, such as patents, trademarks, copyrights, know-how, confidential or proprietary information, trade secrets, and information systems, to be used only for business purposes.

Chiesi protects and maintains the confidentiality of its information and any confidential information disclosed to Chiesi by its customers, partners, suppliers and other third parties during the course of business. It also respects the intellectual property of competitors, business partners, and other third parties.

Chiesi respects and complies with the insider trading laws that prohibit trading in securities of a publicly traded company by persons who have material information that is not generally known or available to the public. No one is permitted to derive personal benefit, whether directly or indirectly, by using Chiesi's information acquired during the performance of their assigned duties.

All Chiesi people are required to adopt the necessary precautions to protect, safekeep and diligently guard Chiesi information and assets throughout their lifecycle in compliance with all applicable laws and regulations. Improper disclosure or use of confidential information could undermine Chiesi's competitiveness and cause serious harm to the Group, its reputation, its business partners, suppliers, or customers.

### Reference documentation

- *Insider Trading Guideline*
- *Information Classification and Handling Procedure*
- *Chinese Wall Guideline*

## USE OF COMPANY EQUIPMENT, DEVICES AND STRUCTURES – CYBERSECURITY

Chiesi is committed to supplying the best devices and technological tools to mitigate cybersecurity risks and improve the protection of information, know-how, business processes, digital assets and technologies throughout the Group.

To achieve this goal, Chiesi provides training to all employees to increase awareness of cybersecurity and best practices in the use of Company devices and technologies.

Chiesi prohibits any behaviour that could compromise the integrity of the Company`s IT assets and requires strict adherence to IT & Security Procedures.

### Reference documentation

- *Global Information Security Policy*

## ANTITRUST AND FAIR COMPETITION

Chiesi is committed to promoting fair competition and protecting the pharmaceutical market from unfair business practices. The Company recognises healthy and fair competition as a value system that fosters innovation and growth, ultimately benefitting both customers and stakeholders.

Chiesi prohibits any business behaviour that may interfere with fair market practices or create barriers to fair competition. Therefore, it requires all Chiesi people to act in full compliance with applicable antitrust and fair competition legislation, as well as rules and best practices defined by the relevant competition authorities.

In order to minimise antitrust and unfair competition risks, Chiesi has defined specific antitrust compliance programmes. These include regular training sessions and information campaigns to promote and assess the antitrust and fair competition culture among Chiesi people and stakeholders.

## TRADE COMPLIANCE

Violations of global trade control laws can result in significant fines and penalties against Chiesi and the individual(s) involved.

Therefore, Chiesi is committed to refraining from business with counterparties that are on any lists of designated parties or are subject to any sanctions related to violations of customs, export-import and/or anti-boycott laws or embargoes, or similar restrictive measures.

Chiesi requires its suppliers to comply with trade laws and regulations and to promptly report any suspected activity which may result in their possible inclusion on lists of designated parties or the application of trade sanctions.

Chiesi requires Chiesi people to conduct background checks on sensitive business partners and include specific trade compliance clauses in commercial agreements. At the same time, Chiesi is committed to complying with laws and regulations governing trade, distribution and use of medicinal products in the markets in which Chiesi operates.

### Reference documentation

- *Group Anti-Bribery Policy*

## PUBLIC AFFAIRS

Chiesi is committed to providing its perspective to public policy debates through regular engagement with policymakers and other external stakeholders. We believe that our contribution, based on data driven information and insight, could help advance policy development, particularly in the fields of innovation, patients' access to medicines, healthcare systems' resilience and sustainability. In doing so, we commit to the highest standards of ethics, integrity, and transparency.

In their interactions with institutional and governmental stakeholders, Chiesi requires its people and business partners to strictly comply with the rules of operation of the bodies and authorities they interact with, refraining from any behaviour that could be interpreted as undue interference in their operation.

Chiesi upholds the highest level of political neutrality and, in accordance with the provisions of the Chiesi Group Anti-Bribery Policy, does not allow any direct or indirect contribution, in any form, to political parties, political or union organisations, or in favour of the relevant representatives, unless such contributions are allowed by

applicable laws. In such a case, specific rules must be defined at local level, to define in which specific cases political contributions are allowed and the relevant approval flow to assess such requests.

#### Reference documentation

- *Group Guideline on Public Affairs Activities*
- *Group Anti-Bribery Policy*

## PATENTS, TRADEMARKS AND COPYRIGHTS

Chiesi promotes and encourages the activities of Chiesi people and business partners in innovative research, which may be a source of intellectual and industrial property. The Company undertakes to recognise each person's role and contribution and is committed to avoiding infringements of third parties' rights by taking all the necessary steps to have the freedom to operate to the best of Chiesi's knowledge.

It is the duty of each of us to support the creation, protection, maintenance and defence of Chiesi's intellectual property rights and to use these rights responsibly.

Chiesi prohibits the unauthorised use, theft or misappropriation of third-party intellectual property which may result in significant fines, litigation, injunctions or criminal sanctions against the Group and those involved.

#### Reference documentation

- *SOP "Global Trademarks and Domain Names Portfolio Management"*
- *SOP "Creation And Management Of Digital Channels Across The Group"*

## CONFLICT OF INTEREST

Chiesi is committed to preventing and promptly identifying and evaluating any situation where business, financial, family or personal interests may influence or interfere with the professional decisions of Chiesi people. This also involves training them to identify and properly manage conflicts of interest.

Chiesi requires all Chiesi people to act with loyalty, integrity, diligence, impartiality, fairness and transparency, and to make professional decisions exclusively in the interest of Chiesi, in accordance with the conflicts of interest regulations and the internal rules and procedure adopted by the Company.

To guarantee that any conflict of interest is properly addressed and managed, Chiesi requires all Chiesi people to communicate any actual or potential conflict of interest situation to the relevant line manager, Human Resources and/or the Compliance function, in accordance with applicable local procedures.

### Reference documentation

- *Group Anti-Bribery Policy*

## ANTI-BRIBERY

Chiesi takes a zero-tolerance approach towards any form of bribery and corruption and prohibits any form of bribery, corruption, extortion and embezzlement.

Chiesi has adopted a Group Anti-Bribery Policy, which aims at providing Chiesi people, business partners and anyone who acts on behalf of Chiesi or for Chiesi, in any capacity, with a set of general principles and rules on how to recognise and deal with bribery and corruption issues and how to comply with anti-bribery rules and regulations.

Chiesi requires all Chiesi people, business partners and anyone who acts on behalf of Chiesi or for Chiesi, in any capacity, to report any actual, believed or suspected conduct/event which may entail bribery through dedicated channels.

Chiesi also requires its suppliers to comply with applicable anti-bribery laws and the Chiesi Group Anti-Bribery Policy, as well as to promptly report any suspected activity which may entail bribery in relation to the execution of the agreement with Chiesi.

### Reference documentation

- *Group Anti-Bribery Policy*

## MONEY LAUNDERING

Chiesi is committed to protecting its business and operations against any conduct that may entail money laundering and the introduction of assets (not only cash) originating from criminal offences into the regular financial and economic cycle of Chiesi.

Chiesi takes a zero-tolerance approach towards any actions, whether committed by Chiesi people or by anyone acting on behalf of Chiesi, that is intended to violate applicable money laundering regulations.

In this regard, Chiesi has adopted specific internal rules and procedures to ensure that all costs, debts, incomes, payments, and expenditure commitments are properly documented and reported. Appropriate internal controls have been established.

Chiesi requires all Chiesi people to fully comply with these processes and procedures obtaining prior review and relevant approval.

### Reference documentation

- *Group Anti-Bribery Policy*



# Code Of Conduct

## IMPLEMENTATION AND DISSEMINATION

### OBLIGATION OF AWARENESS OF THE CODE

All recipients of this Code of Conduct (Chiesi people, partners and, in general, all third parties who may act in the name or on behalf of Chiesi) are required to be familiar with the principles and contents of the Code, with the reference policies and procedures, as well as with the legislation governing their functions and responsibilities, with respect to which full compliance is expected.

### CODE DISSEMINATION

Chiesi is actively committed to guaranteeing maximum dissemination of the Code of Conduct to all recipients and to adopting appropriate measures to verify their adherence and respect.

The Code is published on the Group's intranet as well as on the Chiesi Group's website to ensure full accessibility to all recipients.

### CONSEQUENCES OF NOT APPLYING THE CODE

Violations of the Code of Conduct, as well as any other Chiesi policy or procedure, by Chiesi people may result in the application of disciplinary measures in accordance with applicable laws, procedures, and safeguards.

*Approved by the Board of Directors on July 19, 2024*

