



# **Code of Professional Ethics and Business Conduct**

**CHIMCOMPLEX S.A. BORZEȘTI**



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## **I.Introduction**

The principles and values such as integrity, responsibility, leadership, fairness and respect for the law were the basis of the success of Chimcomplex S.A. Borzesti. They have guided the company's business approach since its establishment, and a commitment to these values has always been a fundamental requirement for every Chimcomplex employee.

The public image of the Company is determined by the conduct of each of its employees. This code forms the basis of our relationships within the company, but also with interest groups outside the company. Being a strategic company for the Romanian economy, Chimcomplex S.A. Borzesti faces the challenges arising within this industry, having a considerable responsibility in relation to stakeholders, including Chimcomplex S.A. employees, customers, shareholders, authorities, interest group representatives, non-governmental organizations, local communities, business partners and the general public.

This Code of Professional Ethics and Business Conduct establishes a series of standards that apply to all of us equally – namely members of the Board of Directors, directors, managers and employees of Chimcomplex. These rules do not and cannot anticipate all aspects that may arise, but they do set out the basic principles that apply in the conduct of our professional activities. In some cases, these rules may be adapted based on local laws and regulations. In all professional situations where this Code of Business Ethics appears to be incomplete or unclear, we must use both our judgement and common sense, and if we are unsure, consult with our supervisor and colleagues in the compliance department on how to handle the situation. We must respect not only the letter of this code of business ethics, but also its spirit in all professional activities. Regardless of our position in the company, we must abide by this code and ensure that everyone under our authority will do the same.

The company makes every effort to permanently rise to the expectations and challenges that arise. Because our activity has a major effect on the population, environment and economy, we show our permanent availability to have an open relationship with all categories of natural or legal persons who could share our concerns, who have the attribution to control our activity and appreciate our performance. These include our competitors, government and political representatives, regulators, civil society, local communities and the media.

The Company's country executives assessed the importance of various legal and ethical issues, as well as compliance risks for the Company. The most important issues arising from this



evaluation are addressed in this Code of Business Ethics. The Board of Directors of Chimcomplex SA has adopted this binding code at Company level.

The Company is committed to conducting its activity in accordance with the laws and regulations applicable in Romania. In addition to said laws and regulations, we also comply with applicable corporate guidelines and policies, including this Code of Business Ethics, Business Ethics Principles and international standards, including to implement principles of human rights, working conditions, anti-corruption and the environment, and are committed to contributing to the Sustainable Development Goals by considering and integrating social and environmental considerations into all our activities. When interacting with our customers, suppliers and competitors, as well as other third parties, we are not bound by or participate in anticompetitive, discriminatory or illegal agreements.

## **II.The concept of business ethics**

Business ethics can be defined as the application of commonly accepted ethical principles, transformed into a code of professional behavior, in individual and corporate business processes.

To be moral in business, one needs a complete awareness of:

- The need to conform to rules, such as state laws, community customs and expectations, principles of morality, policies of the given organization, and general principles such as care for others and fairness;
- How the organization's products and services, along with the actions of its members, can affect its employees, the community, and society as a whole, whether in a positive or negative manner.

Business ethics also involve organizational and corporate culture related to the rules of ethical behavior, the underlying value system, ethical principles, and specific ethical rules that a company strives to apply.

Business ethics became especially important in the nineties of the last century. This was a period of economic recession in many areas of business, accompanied by strong competitiveness in the global market and a significant decrease in the number of employees, mergers between companies and exceptional labor mobility.



Business ethics is not only a process of exchange of moral norms between businesses, but is first and foremost an ethic of responsibility, since the current problems of business ethics in modern society are under the sign of globalization, computerization and ecological crisis.

Business ethics not only exist between companies and their environment but is equally important for relationships within the company itself. The relationships between employees and management must be perceived through the prism of business ethics and moral action.

### **III. Principles and values of the Company in business and society**

#### **III.1. Compliance with Competition Law**

The company complies with the principles and rules of free and fair competition, which exclude anticompetitive behavior and abuse of dominant position in the market. Thus, the Company wants and must comply with competition law.

Company personnel should not discuss prices, volumes, market shares, business strategies, customers, sources of supply and other similar competitively sensitive topics with competitors with competitors unless necessary and strictly limited to projects authorized and approved in advance by competition law experts.

The Company's expectations from its entire staff:

- Not to inform competitors about sensitive competitive issues, such as prices (including discounts or discounts), quantities, terms and conditions, customers, delivery areas, costs and capacities, etc., unless this is necessary and strictly limited to authorised projects and with the prior approval of competition law experts.
- Maintain contact with competing companies for legitimate purposes only and clarify with superiors or the Compliance Officer any concerns regarding the legality of the issues if they have the slightest doubt.
- Immediately end the discussion or meeting when a competitor brings up competitively sensitive issues and make it clear to them that they will not engage in anticompetitive behavior. Ensure that their departure from the meeting or stopping the conversation is properly mentioned in the meeting minutes.



- Not abuse a dominant market position through unfair trading practices or unjustified discrimination against business partners.

### **III.2. Anti-corruption**

The company adopts a zero-tolerance policy towards bribery and corruption. The employees of Chimcomplex S.A. must not use the attributions of the position held for purposes other than those related to the fulfillment of their job duties.

Corruption can be active or passive. Thus, active corruption consists of giving an undue advantage to another person in order to hijack a decision-making mechanism (authorization, right, transaction, contract, etc.), and passive corruption consists of receiving an undue advantage in exchange for refraining from an act or action contrary to the obligations of the office. Passive corruption is not necessarily required, but it can lead as far as extortion.

It is forbidden the abuse of power committed in the exercise of the function by an employee of the company, regardless of status, structure or hierarchical position, in his own interest or in order to obtain a personal profit, directly or indirectly, for himself or for another, natural or legal person.

The Company, through its employees, representatives and collaborators, does not participate in activities involving bribery and corruption in any form, in any of the areas in which it operates.

Employees or anyone acting on behalf of the Company must not make payments or provide any gift or entertainment to other decision-makers, offer, provide or accept, directly or indirectly, money or other benefits in order to obtain, maintain, attract or secure personal or professional advantage. This principle applies even if the beneficiaries of these advantages are not employees or agents, but exclusively the company.

Any employee who is asked for a bribe must immediately report the situation to their direct superior and ethics structure.



Corruption generates costs, by reducing economic efficiency, on the one hand, depriving communities of some of the services provided for the benefit of certain people and, on the other, diverting the effort of societies to develop their technology and competitiveness. Corruption can also harm the dignity and integrity of those who suffer the consequences, to their detriment. Therefore, Chimcomplex S.A. Borzești condemns corruption in all its forms, regardless of the moment, place or circumstance.

The company takes active measures to avoid conflicts of interest. The entire staff of Chimcomplex S.A., regardless of the function performed, is obliged: not to make decisions or not to participate in making a decision in which they also have a personal interest; to properly perform his/her job duties without being influenced by his/her interests as a private person, which may include a benefit for himself/herself or his/her family, relatives up to the fourth degree, or persons with whom he/she is in affinity relations, for friends, persons or organizations with whom the employee has had political or business relations; not to be involved in actions / situations, contractual relationships that could influence the individual decisions of the company's staff, when acting in its interest and which would generate

The Company's expectations from its entire staff:

- To ensure fair and equitable treatment of suppliers in tenders and not allow any supplier to influence them dishonestly by various fraudulent means.
- Never offer advantages to a customer's employee, who makes the purchase.
- Never attempt to influence elected officials, civil servants or other public officials by giving donations, for example to speed up an approval process.

### **III.3. Conflict of interest**

The company takes active measures to avoid conflicts of interest. The entire staff of Chimcomplex S.A., regardless of the function performed, is obliged: not to make decisions or not to participate in making a decision in which they also have a personal interest; to properly perform his/her job duties without being influenced by his/her interests as a private person, which may include a benefit for himself/herself or his/her family, relatives up to the fourth degree, or persons with whom he/she is in affinity relations, for friends, persons or organizations with whom the



employee has had political or business relations; not to be involved in actions / situations, contractual relations that could influence the individual decisions of the company's staff, when it acts in its interest and which would generate contradictions between the company's interests and its own interests; immediately notify in writing the authorized service/employee (head, management, ethics adviser) if they become aware of a situation of conflict of interest or potential creation of a conflict of interest and avoid participation in that action; engage directly or indirectly in business relations with natural or legal persons.

The employees of Chimcomplex S.A. Borzești must avoid situations that may generate contradictions between the interests of the company and their own interests, including those of the spouse, relatives up to the fourth degree or third parties, in compliance with the legal and internal provisions regarding the conflict of interests; avoid engaging in any activities, ventures or investments which influence or are likely to influence the individual decisions of the company's staff when acting in its interest; to refrain from any conflict of interest, which must be declared as soon as it appears to the ethics adviser by means of a written declaration.

The employees of Chimcomplex S.A. must refrain from any conflict of interest. Any possible conflict of interest must either be declared, by means of a written declaration submitted to the ethics structure, as soon as it arises, or the employee must obtain a derogation from his hierarchical superior, who will inform the ethics structure, to allow him to continue his activity.

If a representative of the staff of Chimcomplex S.A. is involved in a conflict of interest, the company's management must analyze and solve the situation together with the Human Resources Department and the ethics structure.

The staff of Chimcomplex S.A. involved in decision-making processes must complete a "Declaration of interests" or a "Declaration on own responsibility" that they are not in any conflict of interest and submit it to the Human Resources Department. The declaration of interests shall be updated and resubmitted at the beginning of each year or whenever there is a relevant change in the situation of the staff or member of the organisation.

The employees of Chimcomplex S.A. must not engage, directly or indirectly, in business relations with economic operators, natural or legal persons, which would affect the correct, honest and conscientious fulfillment of their job duties.

The Company's expectations from its entire staff:





- Immediately communicate to his/her superior any actual or potential conflict of interest.
- To communicate specifically if he holds certificates of shares in the company of a competitor, client or supplier of Chimcomplex SA. This obligation does not apply if it holds a stake of less than 0.5% in a listed company.
- Not to get involved in the decision-making process, to inform their superior and to remain neutral, if during the activity they discover that their personal interests and those of the Company are incompatible,
- Be aware and remember that a conflict of interest also exists when a family member is involved (including spouse, child, or another close relative), not just the employee personally.

#### **III.4. Anti-money laundering and trade sanctions**

Chimcomplex S.A. does not tolerate, facilitate or support money laundering and implements anti-money laundering measures, in accordance with European and international directives and standards, as well as with the national legislation in force.

Chimcomplex S.A., through its employees, representatives and collaborators, verifies the identity of customers and, if applicable, of their beneficial owners, subjects the business relationship to constant vigilance, based on an adapted approach to risk.

Employees undertake that when they notice that there are suspicions that a certain operation is aimed at money laundering or terrorist financing, to immediately inform the National Office for Prevention and Control of Money Laundering.

Chimcomplex S.A. trains staff and puts into practice rules and procedures adapted to the volume and nature of activities, keeping within the legal deadlines the identification data of customers and operations.

Our company ensures that persons involved in financial decisions and operations are subject to effective monitoring and control systems to ensure compliance with their obligations.

It should be noted that fraud is any voluntary or disguised act or omission committed with intent to deceive or circumvent applicable laws or company rules with the aim of obtaining an undue material or moral advantage for the fraudster or a third party. Fraud generates financial



costs which can be considerable, subsequently difficult to recover, and which pose a serious risk to both individuals and the business as a whole. The forms of fraud are multiple, such as: theft of money, goods, data, voluntary modification, concealment or destruction of documents, forgery of documents or statements, manipulation of accounts, counterfeiting, money laundering, fraud, corruption, etc.

For Chimcomplex S.A. Borzești, fraud, regardless of its form, is unacceptable. Any fraudulent act exposes the fraudster to the penalties provided by the legislation in force and by the internal regulations of the company.

The Company's activity, from a commercial point of view, involves the marketing of different products, but also the purchase of materials received for the realization of finished goods, with different business partners, from different countries, governed by different laws. The company needs to know who the people with whom it does business with, actually are. It is the only way for the Company to identify risks and prevent its involvement in criminal activities. The company must always comply with export controls and must reduce the risk of a completed transaction being used by third parties for money laundering.

The Company's expectations from its entire staff:

- Ensure that each new business partner, whether customer or supplier, is screened to see if they are on the relevant European Union Restricted Persons or Entities lists or owned or controlled by an individual beneficiary who is on such a list.
- If they intend to start a business with new partners in countries that are subject to sanctions, request a risk assessment from the Compliance Officer.
- Report to their supervisor any commercial transaction they find unusual or suspicious, for example when the recipient's bank account holder is different from the provider or when money is to be transferred to a country with no clear link to the transaction in question.

#### **III.4. Responsible Use of Company Assets**

The Company's assets must be used responsibly. This obligation covers not only physical and tangible objects such as equipment, vehicles, furniture, funds, consumables and telephone and information networks, but also intangible aspects such as ideas, creations and concepts.



Employees are not allowed to use the Company's assets for personal business or other commercial endeavors, nor for illegal activities, gambling or pornography. Incidental personal use of computers and other communications equipment is permitted only if it complies with local policies and procedures and does not otherwise impair professional performance. All rights to goods and information generated or obtained in the course of a company's activity remain the exclusive property of the company, unless otherwise provided by law.

The staff is responsible for the proper use, protection and management of all tangible or intangible assets belonging to or controlled by Chimcomplex SA. In particular, we need to carefully manage financial resources, prevent and detect fraud. We do not damage or misuse company assets, we also avoid unnecessary costs or claims related to company assets.

The Company's expectations from its entire staff:

- To use with care the Company's assets, such as machines, computers or vehicles of the Company, as if they were personal belongings.
- Make sure they distinguish between personal and company assets when using them, so as not to be mistakenly accused of theft or embezzlement. Not to use the Company's assets for personal purposes.
- Follow the Company's procedures carefully to prevent fraud when planning or executing payments.
- Ask questions to colleagues who do not follow procedures such as double checking of payments, to ensure that no harm is done to the Company.

### **III.5. Health and safety at work**

The Company complies with safety and health laws and regulations covering business activities and follows applicable health and safety policies and procedures.

The safety of colleagues, customers and the public may depend on the Company's ability to think clearly and react quickly. The consumption of alcoholic beverages or drugs or inadequate consumption of medicines can reduce the ability to work effectively and safely. Therefore, employees will never consume alcohol or drugs during working hours, while on company premises or while driving a company vehicle.



Occupational health and safety is an essential component of all the Company's professional activities, and ensuring a safe and healthy working environment is one of our core values. Our success depends on the physical and mental well-being of all employees. The company makes constant efforts to prevent and reduce risks to its employees, customers and suppliers, as well as third parties. The company assesses and analyzes risks on a regular basis, to focus on the identified risks, taking appropriate measures. Inspections are also carried out at workplaces to verify compliance with internal and external requirements. The priority responsibility of Chimcomplex's management is to guarantee and maintain a safe working environment. However, each of the employees is responsible and has the obligation to inform themselves about health and safety measures at work, to comply with all applicable rules, regulations and work instructions and to wear the personal protective equipment provided in each situation.

The Company's expectations from its entire staff:

- Always comply with all occupational health and safety regulations and instructions applicable to the task they are performing.
- Always wear the personal protective equipment provided for the task.
- Do not hesitate to intervene and stop the activity in unsafe situations.
- Keep in mind that safety at work is more important than speed of work.

### **III.5. Gifts, hospitality and benefits**

It is forbidden to offer, directly or indirectly, the provision, solicitation or acceptance of gifts, gestures of hospitality and benefits or other unjustified advantages of value, which are related to our professional activity. This principle does not apply to occasional gifts or invitations which have an insignificant monetary value (approximately, the value of an ordinary business meal) and which are in accordance with normal business practices. However, even in this case, no law or legal provision should be violated, and no impression should be left that a gift or invitation influenced a decision of a business partner or authority. Donations for political or social purposes are permitted only if there is a guarantee of full transparency and within the limits of applicable law and local company policy.



The company strives to maintain a professional relationship with suppliers and contractors and other members of the business community. These relationships contribute to success and should be based on good business appreciation, mutual trust and fair trading. However, gifts or entertainment offered to employees by a current or potential supplier may make objectivity difficult in dealing with the person or company offering such benefits. Transparency and business purpose must be the principles by which anything of value is accepted from a supplier.

The Company's expectations from its entire staff:

- Evaluate the value of gifts or benefits first, before accepting any kind of gift, invitation or entertainment.
- Never accept gifts in the form of money or gift cards.
- If you extend an invitation to a business partner, consider the value of the invitation and ensure that it is always in the professional interest.
- Gifts and invitations to business partners should never create the impression that they are trying to influence a decision, therefore they must be very careful during negotiations.

### **III.6. Sustainability and environmental protection**

The Company's responsibility towards the environment is at the core of everything we do. Chimcomplex complies with all applicable laws and standards, as well as other legal requirements regarding environmental protection. The company is actively involved in sustainable, social and environmental development. This does not only apply to activities and work points. The company proactively addresses all challenges, always adopting a long-term perspective in order to prevent any potential pollution, as well as to continuously improve its contribution to environmental protection.

The responsible management of natural resources, in the context of raw material extraction, is of great importance to Chimcomplex. The company ensures that it uses responsibly all natural resources entrusted to it for exploitation.

The company is committed to the principles of corporate responsibility and to supporting the communities in which we operate. It has a responsibility to properly manage the environmental resources it uses and consumes.



The Company also strives to ensure that suppliers demonstrate a high standard of business ethics and respect for human rights and share the Company's commitment to being a responsible member of the community.

The Company's expectations from its entire staff:

- Ensure that all environmental protection laws and regulations, as well as the requirements of environmental permits and permits, are complied with in the area of activity.
- Contribute to limiting the impact of negative activities on the environment as far as technically and economically feasible by reducing emissions, saving energy and other resources, and avoiding waste generation and recycling.
- Ensure that systems, machinery and equipment are properly operated and maintained and that production processes are organised so that avoidable emissions or leaks do not occur.
- Be responsible for documenting and reporting environmental data and ensuring that it is accurate, complete and compliant.

### **III.7. Human rights and equal employment opportunities**

All employees deserve a workplace where they are treated with dignity and respect. The company adopts clear human rights standards, such as preventing forced and child labour and combating discrimination. It promotes a culture of mutual trust and values differences of opinion and cultural diversity.

Chimcomplex complies with current legislation and policies on equal opportunities and non-discrimination. Chimcomplex assumes the responsibility to respect human rights. To this end, the fundamental standards set by the International Labour Organisation shall be respected. The company ensures fair employment conditions and complies with labor legislation. The company takes a clear stance against modern slavery, forced or compulsory labour, child labour and human trafficking in all our activities. As part of our obligation as an employer, we support equality and inclusion in the workplace and do not tolerate any form of discrimination (positive or negative), harassment or violence. The company is committed to a sincere and fair dialogue with employee representatives and respects their rights to freedom of association and collective bargaining.



If any employee or trustee notices or is the victim of discrimination, misconduct, or harassment, they should report it to the ethics officer immediately.

If any employee or trustee becomes aware of any violent or threatening behavior that poses an imminent risk of physical harm to an individual, they should contact local law enforcement immediately. The Company will promptly investigate all allegations of violence, discrimination and harassment in the workplace and will take appropriate action in accordance with company policy and applicable law.

The Company's expectations from its entire staff:

- No one shall be discriminated against on grounds of race, colour, religion, belief, nationality or social origin, ethnicity, sex (including pregnancy and sexual orientation), gender (including gender nonconformity and transgender status), marital status, age, physical or mental disability, nationality, social class, political opinion, trade union membership, past, current or potential activity in uniformed services, genetic information or any other characteristics protected under applicable law.
- Personnel must report any suspicion of modern slavery, forced labor or child labor within the Company or its contractors – the Company does not tolerate such behavior among business partners or its own workforce.
- Comply with applicable rules on working hours.
- To consider trade unions and works councils as beneficial and constructive partners, together with which fair working conditions are ensured within Chimcomplex.

### **III.8. Employee relations**

In terms of relations with employees, the Company respects social norms of behavior and ethical principles that go beyond the legal framework. Chimcomplex tries to resolve any misunderstandings through constructive dialogue with each other or through the involvement of a superior. If, for various reasons, a different approach is required, the human resources department as well as works councils may intervene as mediators.

The Company's expectations from its entire staff:



- Staff should always treat their colleagues with fairness and respect, regardless of their hierarchical position. Maintain an open and trusting working atmosphere at all levels, encouraging colleagues who have been discriminated against to communicate any issue without restraint.
- In conversations and text messages, make sure they choose context-appropriate words that are objective, demonstrate professionalism, do not hurt or insult.
- Avoid, in particular, statements or jokes that might be perceived by others as a form of discrimination or harassment.

### **III.9. Protection of personal data and information security**

The Company adheres to high standards of personal data protection of employees, customers, suppliers and other business partners. It also respects the rights and privacy of all persons from whom it receives personal data and whose data it processes. The Company pays special attention to the collection, use, disclosure, storage and processing of personal information and other data, in accordance with applicable laws, including, but not limited to, the EU General Data Protection Regulation, as well as in accordance with company policies.

Data protection and security are interdependent. Technical and organizational measures are part of Chimcomplex's concept of data security.

Information to which employees have access by virtue of their job duties must be protected and treated responsibly, especially in the context in which their unauthorized disclosure or error can generate major negative effects at Company level, both legally and reputationally.

Certain categories of information, especially confidential or secret information within the Company must not be compromised in any way and must be responsibly protected by all personnel against damage and unauthorized access. This category of information includes, but is not limited to, in particular, financial results, business plans, technical information and design results, intellectual property and personal information.

The Company's expectations from its entire staff:

- To handle personal data confidentially and with special care, in accordance with both applicable data privacy laws and internal guidelines within the Company.





- To transmit personal data only to those persons authorized to view and process them.
- To collect, use and store personal data only to the extent that this is absolutely necessary for the defined purpose.
- Ensure that all digital and paper documents are protected against unauthorised access in line with current standards. To comply with the regulations regarding the safe operation of IT systems at Chimcomplex level.

### **III.10. Trade secrets and inside information**

All documents and information regarding the internal operations of Chimcomplex SA, the disclosure of which could harm the Company or the Group of affiliated companies, SCR and CRC, must be treated confidentially. They will not be disclosed or made available to third parties and will be protected against unauthorized use or disclosure, in particular against external access. Confidential information includes all nonpublic strategic, financial, technical and commercial information, such as, but not limited to, administrative procedures and processes, organizational matters, technical know-how, business and financial plans, costs, product development, information about employees, customers, suppliers, marketing strategies, sales and pricing. Administrative and legal requests for company documents containing confidential information will be reviewed and resolved, subject to the company's right to object. This confidentiality obligation also applies to documents and information entrusted to Chimcomplex employees by third parties. Confidential information may only be disclosed if required by law or authorized for commercial purposes. In all such cases, the immediate superior must be informed before they are disclosed. Third parties receiving such information must sign a confidentiality agreement.

The Company's expectations from its entire staff:

- Pay more attention in the management of trade secrets at least as in the case of valuable material goods. Often information has a higher value than objects.
- Keep in mind that disclosing trade secrets can be a criminal offence and can not only harm the company, but also cause you serious personal problems.



- When conducting business discussions in a larger group or in public (e.g. on the phone), ensure that only topics that are not sensitive from a privacy perspective are addressed, should they be heard.
- Also, make sure that during private conversations you do not disclose any confidential information.

**Insider information** is non-public information about data, projects, transactions or processes, the disclosure of which could influence the price of Chimcomplex shares or other financial instruments issued by Chimcomplex (for example, bonds) or derivatives thereof. All employees who have access to inside information must comply with applicable law and Chimcomplex SA guidelines on insider trading.

The Company's expectations from its entire staff:

- If he has inside information, he is forbidden to buy or sell shares or bonds or any other financial instruments / derivatives thereof, these acts being punishable by a fine or imprisonment. Attempting insider trading, giving recommendations or misleading third parties is also punishable.
- Be particularly attentive to the possible consequences of using inside information to trade in financial instruments even before the publication of the company's results, such as annual financial statements or quarterly results.
- If they have questions or are unsure about this topic, contact the legal department.

### **III.11. Accounting, reporting and fees**

All business transactions must be recorded correctly, properly and on time. The company ensures the correctness, accuracy and completeness of accounting records, records and reports in accordance with established procedures, generally accepted accounting principles, systems, controls and appropriate accounting audits. It is essential for the Company to comply with applicable tax and customs rules, including but not limited to tax evasion prevention laws. The requirement of correctness of information also applies to accounts in which travel, and other expenses are recorded.



The Company's expectations from its entire staff:

- Strictly follow the Company's processes and guidelines and ensure the accuracy and completeness of all records, both for making accounting records and for documenting all business activities.
- Always document transaction information in a timely and accurate manner; not to alter or omit any information in order to intentionally change the meaning of the transaction.
- Refuse to register false information and report to their supervisor if they discover false records or are asked to make false records.

## **VI. Compliance and ethics contacts**

All Chimcomplex SA staff is obliged to contact their supervisor or manager to discuss any ethical or compliance concerns. However, employees can also contact their HR representative, compliance and ethics representative, or any of the available ethics officers. The contact details of the responsible persons, as well as the content of this code of business ethics can be found on the Chimcomplex website and are also displayed at the headquarters of Chimcomplex SA Borzești and Chimcomplex SA Ramnicu Valcea Branch. Employees can also send any ethics reports to the email address at [whistleblower@chimcomplex.com](mailto:whistleblower@chimcomplex.com).

This Code of Business Ethics was approved by the Management of Chimcomplex S.A. and signed on 07.02.2023.

The Chairman of the Board of Directors,  
Stefan Vuza