



# **CODE OF CONDUCT**

**SQM-Pavoni**



*At SQM-Pavoni, we believe in fair competition. We are committed not to engage in any acts of bribery or corruption anywhere in the world. We expect the same uncompromising behavior from our directors, officers, employees as well as our distributors, agents and partners all over the world. Any action in contravention of the present policy will be dealt with swiftly and severely to the fullest extent of the law.*

F.Biot

Chairman



SQM-Pavoni Code of Conduct provides guidance on critical policies and regulations that reflect the company values. All the SQM-Pavoni officers, directors and employees are expected to follow this guide.

## Making Ethical Decisions

We need to consider the impact our decisions have not only to SQM-Pavoni but also to ourselves and others. In most situations, the right decision is clear and straightforward; however, there may be times when what is right is not always obvious and, in such situations, it becomes important asking ourselves if our decision may in any way violate the company or its values, cause any harm to the people we work with, or violate the law. In these cases, please talk to our Compliance Officer.

## Respect in the workplace

We are committed to maintaining a respectful and inclusive work environment, free of discrimination and harassment. Our employees are our most valuable resource. We are individually accountable for creating a workplace that values our diversity and ensures the opportunity for everyone to contribute to SQM-Pavoni's success. This means that we:

- Treat each other in a respectful and professional manner.
- Do not discriminate against groups or individuals based on race, ethnicity, colour, national origin, religion, disability, age, gender, gender identity, gender expression, genetic information, sexual orientation, marital status, veteran status, citizenship status, or any other protected category.
- Provide an inclusive work environment that is free from any form of harassment or other behaviour that creates an intimidating, hostile, or offensive work environment
- Make all employment-related decisions based on merit.
- Comply with all equal employment opportunity and related laws.

## Health and Safety

We are committed to protecting our employee's health and safety. We are responsible for creating and maintaining a safe work environment and maintain a drug-free and violence-free workplace. This means that we:

- Comply with all applicable health, safety, and security policies, procedures, internal controls, and regulations.
- Do not tolerate any acts of intimidation, aggressive behaviour, or threats of physical violence.
- Prohibit the possession of explosives, firearms, or weapons inside SQM-Pavoni facilities.
- Will not use, be under the influence of, possess or distribute illegal drugs, or alcohol abuse while on SQM-Pavoni premises or when conducting SQM-Pavoni business.



## Privacy

We respect employee, customer, and third-party personal information. For those who have access to personally identifiable information related to our employees or to others, we must always ensure that proper measures are taken to protect this information and exercise caution prior to disclosing it to others. This means that we:

- Only access, collect, use, or share personal information for authorized business reasons
- Take measures to safeguard personal information from loss, misuse, or unauthorized access.
- Use special care when transferring personal information to an authorized third party and use nondisclosure agreements or similar measures to safeguard information
- Retain and store records in accordance with the law.

## Commitment to quality

We are committed to exceeding customer expectations. We wish that our customers are fully satisfied of our products and services and we believe that the best way to build successful and long-lasting customer relationships is to provide customers with superior products and services. This means that we:

- Comply with all internal quality controls and applicable quality standards, contract requirements, and regulations that govern our products and services.
- Deliver materials, products, and services in accordance with the quality control and testing promised under our contracts and guard against product substitution or use of counterfeit parts.
- Continuously focus on improving our processes in order to drive flawless execution.

## Preventing bribery and corruption

We are committed to follow SQM-Pavoni Anti-Bribery and Anti-corruption Policy, from which we mention:

- No allowance offer, give or receive bribes or improper payments in connections with their work for SQM-Pavoni to or from anyone at any time for any reason, and no one should ever ask anyone else to engage in bribery or make improper payments on SQM-Pavoni's behalf.
- Duly registration of any financial and accounting transaction.
- Not allowance to use company assets for personal gain by third parties, or for inappropriate or illegal purposes.

## Fair competition

We are committed to competing fairly and conducting our business in compliance with all applicable competition and antitrust laws.

We believe in fair and open markets and must never engage in improper practices that may limit competition. We compete vigorously to be an industry leader through superior performance, price, and quality. This means we:

- Support and comply with competition laws in all markets and jurisdictions in which we do business.



- Never attempt to monopolize a market or control prices with our competitors, customers, or suppliers, either through written or verbal agreement.

## **Confidential information and intellectual property**

We protect confidential information and intellectual property. We are required to use confidential information and intellectual property solely for legitimate business purposes. This means we:

- Prevent unauthorized use, disclosure, or access to confidential information that belongs to SQM-Pavoni or third parties.
- Ensure an approved nondisclosure or confidentiality agreement is in place before any exchange of SQM-Pavoni's confidential information or receipt of a third party's confidential information.
- Not take or use SQM-Pavoni's confidential information upon terminating from SQM-Pavoni without explicit approval.
- Always protect SQM-Pavoni's Intellectual Property and respect the Intellectual Property rights of third parties.

## **Social Networks, Blogs, personal websites**

We encourage employees to use social media responsibly. While the Internet provides us with the potential to share valuable information using a wide variety of social media tools, we are all responsible for exercising care and using good judgement. This means we:

- Never post material that is obscene, threatening, or abusive.
- Never disclose SQM-Pavoni, customer, or third-party proprietary or confidential information.
- Ensure that the opinions expressed are stated as our own and not those of SQM-Pavoni.

## **Business records**

Our business records and disclosures must be accurate, complete, and timely. We are responsible for honesty and transparency in the preparation and maintenance of our business records, including our time cards, expense reports, cost or pricing data, billing, quality, safety, and procurement records. This means we:

- Maintain accurate records in accordance with all legal and business requirements.
- Accurately reflect all transactions in our financial records and ensure that they do not contain false or misleading statements or entries.
- Properly document business expenses in compliance with established policies and procedures.
- Preserve records that are subject to a legal hold.

## **Protecting company assets**

We are responsible for the appropriate use of SQM-Pavoni property, equipment, and other assets. We are personally responsible for protecting SQM-Pavoni assets, and those provided to us by our customers, against unauthorized access, fraud, theft, loss, or abuse. This means we:



- Immediately report any suspicions of cyber-attack (e.g., phishing emails), fraud, theft, loss, or misuse of SQM-Pavoni assets.
- Do not share passwords and only access data that we are authorized to view.
- Only download, install, or run authorized or licensed software.
- Return SQM-Pavoni property, including files or data, when we leave SQM-Pavoni employment.

## **Human Rights**

We are committed to protecting human rights and preventing human trafficking. This means we:

- Reject any human trafficking-related activities (e.g., procuring commercial sex acts and using child and forced labour).
- Avoid misleading or fraudulent recruiting and employment practices (e.g., charging recruiting fees, denying access to an employee's identity or immigration documents, failing to disclose key terms and conditions of employment).
- Recognize the right to collective bargaining and comply with all applicable wage and hour laws.

## **Environment**

We are committed to good corporate citizenship and preserving the environment. This means we:

- Support environmental sustainability through pollution prevention, waste management, energy conservation and recycling.
- Comply with all applicable environmental, health, and safety laws and regulations.

## **Reporting Obligations and Additional Information**

All SQM-Pavoni Personnel and Business Partners employed by or affiliated with SQM-Pavoni have a responsibility to promptly report suspected or known violations of this Code of Conduct, and any applicable laws. Reports can be made to the Compliance Officer to the email address:

[denunce@pavonispa.it](mailto:denunce@pavonispa.it)

Reports may be made anonymously, where permitted by local law.

Our Compliance Officer will be available also for any doubts or any further information or clarifications you might need.

SQM-Pavoni will not retaliate or tolerate retaliation against any employee who reports in good faith a potential violation of this Policy, even if an investigation eventually determines that no violation occurred.

## **References**

This Code of Conduct is available at Company section at our website [www.pavonispa.it](http://www.pavonispa.it).