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Società a socio unico soggetta a direzione e coordinamento da parte di Ginegar Plastic Products Ltd
Single shareholder company subject to management and coordination by Ginegar Plastic Products Ltd



Code of Ethics

1 GENERAL

.1 Premise

The company FLEXTECH SRL (hereinafter, also, the Company and/or "FLEXTECH") is a limited liability company whose objective is to create value for its members in compliance with the principles established by the Code of Ethics. FLEXTECH's mission is to develop its range of plastic products and films in compliance with all legal regulations and rules designed to protect the interests of customers and fair competition. Credibility and reputation are two of the main intangible factors of a company, capable – in themselves – of creating many other tangible values such as positioning in the minds of its customers, the relative level of loyalty, the quality perceived by these customers, its reliability and recognizability. FLEXTECH therefore considers it essential to clearly and firmly express its ideals, its culture, its values and therefore, its institutional mission, which is the basis of the conduct of its corporate bodies, management, middle managers and people who work with the Company and for the Company, towards the Public Administration, towards customers, towards suppliers, credit institutions, and the entire community, for the trust they place in FLEXTECH's activities.

1.2 Purpose and scope

This document has been prepared by FLEXTECH with the aim of defining a Code of Conduct, based on the values that characterize the Company, which must serve as a precise reference for all the activities carried out by the Company in its internal and external relations. This Code of Ethics (hereinafter, also referred to as the Code) therefore defines the general principles of conduct that apply, without exception, to all those who work to achieve FLEXTECH's objectives.

1.3 Recipients and General Principles

The Recipients of the Code of Ethics are the subjects entrusted with the governance of the Company, employees, collaborators, consultants, third parties and in general all those who, directly or indirectly, permanently or temporarily, establish relationships or relationships with the Company itself. The Recipients must never fail to comply with the fundamental principles that inspire the Code of Ethics, such as honesty, moral integrity, fairness, transparency and objectivity in the pursuit of corporate objectives. The above-mentioned persons, during the performance of their duties, must comply with the laws and regulations in force, orienting their actions and conduct to the principles, objectives and commitments referred to in the Code.

Under no circumstances can conduct carried out in violation of laws, regulations in force and this Code be considered an advantage for FLEXTECH and, therefore, no one can be considered authorized to engage in such conduct under the pretext of wanting to favor the Company. Furthermore, all Recipients must take all possible actions to avoid any form of discrimination and physical and psychological harassment and, in particular, any discrimination based on race, nationality, sex, age, physical disabilities, sexual orientation, political opinions, trade unions or religious beliefs. Everyone, within the scope of the responsibilities related to the role held, must provide the highest level of professionalism available to them and carry out the assigned activities with commitment, contributing in a concrete way to the achievement of the company's objectives. FLEXTECH does not intend to enter into or continue any relationship with anyone who demonstrates that they do not agree with the content or spirit of this Code or violates its principles or rules of conduct.

2 CORPORATE VALUES

2.1 Ethical principles and excellence of the services offered

FLEXTECH is aware of the fundamental social role connected to its entrepreneurial activity. FLEXTECH promotes and requires models of ethical behaviour in the performance of work activities, inspired by the principles of contractual good faith, loyalty, fairness and transparency. The legitimacy of any conduct adopted must be – from a formal and

substantive point of view – such as to protect and permanently improve the credibility, reputation, reliability and image of FLEXTECH. Corruption, illicit enrichment, collusion, are, without exception, prohibited.

It is forbidden to accept money or gifts of any nature and consistency if they cannot be considered as mere acts of commercial courtesy, such as not to influence the behavior of the recipient: otherwise, it is mandatory to report the fact to one's hierarchical superior and/or to the Supervisory Body if established. FLEXTECH promotes and develops behaviors among its staff such as to foster a sense of identification with the company itself, aware that its activity is developed with professionalism to be considered adequate only if this commitment is, in practice, shared and applied by all its staff. FLEXTECH promotes information, dialogue, collaboration and maximum transparency towards institutions, associations and the social context in which it operates. It is forbidden to make false statements to institutions, associations and the community.

FLEXTECH shares, supports and implements compliance with the Ten Principles of the UNGC (UNITED NATIONS GLOBAL COMPACT), which form an integral and substantial part of this Code of Ethics, namely:

1. Uphold and respect international human rights provisions
2. Ensure that they are not jointly responsible for the abuse of human rights standards
3. Support freedom of association and the recognition of collective bargaining rights
4. Support the elimination of all forms of forced and compulsory labour
5. Support the abolition of child labour
6. Support the elimination of discrimination in employment and occupation
7. Support a preventive approach to environmental challenges
8. Take initiatives to promote environmental responsibility
9. Encourage the development and deployment of environmentally friendly technologies
10. Fight corruption in all its forms, including extortion and bribery.

In addition, FLEXTECH is committed to respecting and enforcing the 8 fundamental conventions of the International Labour Organization:

- C29 - Forced Labour Convention, 1930
- C87 - Convention on Freedom of Association and Protection of the Right to Organise, 1948
- C98 - Convention on the Right to Organise and Collective Bargaining, 1949
- C100 - Equal Pay Convention, 1951
- C105 - Convention on the Abolition of Forced Labour, 1957
- C111 - Convention on Discrimination (Employment and Occupation), 1958
- C138 - Minimum Age Convention, 1973
- C182 - Convention on the Worst Forms of Child Labour, 1999

These conventions are taken up and adopted by FLEXTECH in accordance with the inspiring principles set out in this Code of Ethics.

FLEXTECH is committed to following the OECD's Guidelines for the Responsible Sourcing of Materials from Conflict-Prone and High-Risk Areas.

FLEXTECH does not use materials and raw materials of which:

- Regulation of the Ministry of Administration of Denmark No. 1082 of 13 September 2007
- pursuant to EEC Regulation no. 2008/0240 (COD) of 27 May 2011
- EEC Regulation No. 1907/2006
- the Stockholm Convention of 22 May 2001, fourth meeting in Genoa in May 2009;
- to the Rotterdam Convention, Pic Circular XXV – June 2007
- the Montreal Protocol on Substances that Deplete the Ozone Layer
- the Kyoto Protocol of 1992, first and second sentences

- to EEC Regulation No. 67/548
- to EEC Regulation no. 1272/2008
- to the list of substances that deplete the ozone layer as provided by the government of the PR of China, first series (revised in 1998).

Finally, FLEXTECH, pursuant to EU Directive 2019/1937 as implemented by Legislative Decree 24/2023, has implemented a special electronic reporting channel, encouraging employees and anyone interested to report facts and behaviors sanctioned by this so-called whistleblowing legislation. FLEXTECH protects and guarantees the anonymity, absolute confidentiality and encryption of the whistleblower's and the report's data, as they are accessible exclusively to the recipient.

2.2 Compliance with Law

Acting in compliance with the law is a priority requirement for FLEXTECH. FLEXTECH has as an essential principle compliance with the laws and requires its directors, collaborators, employees in general, third parties with whom it has commercial and/or institutional relations and anyone who carries out functions or tasks on its behalf in any capacity, to comply with the legislation and all the regulations in force and with the principles and procedures preordained for this purpose, as well as ethically correct behaviour, such as not to jeopardise their moral and professional reliability.

2.3 Relations with the Public Administration and the Judicial Authorities

FLEXTECH pursues the goal of maximum integrity and fairness in relations, including contractual ones, with public institutions and local authorities and, in general, the Public Administration. All relations with persons who may be considered public officials or persons in charge of public services must be conducted in strict compliance with the laws and regulations in force, the principles set out in the Code of Ethics and Model 231 and must be based on the utmost transparency and fairness in order to ensure the absolute legitimacy of the Company's work. Relations with the Public Administration are maintained by the company representatives designated for this purpose. All documentation summarizing the procedures through which FLEXTECH has come into contact with the Public Administration must be duly collected and stored. The operations carried out by the Company, as well as the main contacts with the Public Administration, must have adequate traceability; For each of them, it must be possible to verify the relevant decision-making, authorisation and execution process. Each operation must be adequately documented, in order to be able to proceed, at any time, to carry out checks that make it possible to: i) verify its characteristics and reasons and ii) identify the subjects who authorized, carried out, registered and verified the operation itself. It is not permitted to the Addressees of this Code, either directly or indirectly, or through an intermediary, to offer or promise money, gifts or compensation, in any form, nor to exert unlawful pressure, nor to promise any object, service, performance or favor to managers, officials and employees of the Public Administration, or to persons in charge of public service and their relatives or cohabitants, for the purpose of inducing them to carry out an act that complies with or is contrary to the official duties of the Public Administration (the purpose of favouring or harming a party in civil, tax, criminal or administrative proceedings by bringing a direct or indirect advantage to the Company must also be considered as such). Only forms of gifts, of negligible value, are allowed, provided that they are not also aimed at inducing the above subjects to perform acts contrary to or in accordance with the official duties of the Public Administration. Anyone who receives explicit or implicit requests for benefits of any kind from subjects of the Public Administration, as defined above, must promptly inform the direct superior and the Supervisory Body so that the most appropriate initiatives to be taken can be identified. The requirements set out in the preceding paragraphs must not be circumvented by recourse to other forms of aid and contributions which, in the form of recruitment, assignments, consultancy, publicity or otherwise, have similar purposes to those prohibited by this paragraph. In commercial relations with the Public Administration, it is necessary that the Recipients of this Code

always operate in compliance with the law and correct commercial practice. In particular, the following operations must not be undertaken, directly or indirectly: i. examine or propose employment and/or commercial opportunities that may benefit employees of the Public Administration in a personal capacity; ii. solicit or obtain confidential information that may compromise the integrity and/or reputation of either party. It is not permitted to use or submit statements and documents attesting to untrue facts and news, or omit information to obtain, for the benefit or in the interest of FLEXTECH, contributions, financing, disbursements or other benefits granted, for any reason, by the State, by a Public Body or by the European Union. It is also forbidden to use contributions, loans or other disbursements, however named, granted to FLEXTECH by the State, by a Public Body or by the European Union for purposes other than those for which they were assigned. It is forbidden to alter in any way the operation of a computer or telematic system or to intervene illegally in any way on the data, information and programs contained therein and pertaining to it, in order to obtain an unfair profit to the detriment of others. All employees and/or collaborators are obliged to report to the Company and to the Supervisory Body the request to make or produce before the Judicial Authority statements that can be used in criminal proceedings relating to the exercise of their functions. An employee who is called to court as a witness in any proceeding concerning the company must feel free to present the facts in good conscience, good faith and truthfully; it is forbidden for the Company to induce or encourage employees and/or collaborators not to make/produce the aforementioned declarations, or to make them false.

2.4 Fairness in external relations

The members of the corporate bodies, the employees and, in general, the Addressees of this Code must behave with the utmost fairness and integrity in all relations with persons and entities outside the Company. It is forbidden to use cash or other bearer financial instruments (outside the limits of the law permitted and in a manner contrary to corporate procedures), for any collection, payment, transfer of funds, use or other use of financial resources, as well as the prohibition of the use of current accounts or savings books anonymously or with fictitious names. FLEXTECH condemns any illegal activity, in particular related to arms and drug trafficking, money laundering and terrorism or that in any case hinder human development and contribute to the violation of the fundamental rights of the person. FLEXTECH is committed to complying with all national and international anti-money laundering regulations and regulations. The Recipients must not, in any way and under any circumstances, be involved in events related to the laundering of money from criminal activities or the receipt of goods or other benefits of illicit origin. They are also required to verify in advance the information available on commercial counterparties, suppliers, partners, collaborators and consultants, in order to ascertain their respectability before establishing business relationships with them.

2.5 Establishment and maintenance of business relationships

In starting commercial relationships with new customers and/or suppliers and in the management of existing ones, it is prohibited, on the basis of public information and/or available in compliance with current regulations, to establish and maintain relationships:

- with subjects involved in illegal activities, in particular related to the crimes provided for by Legislative Decree no. 231/2001 and, in any case, with subjects lacking the necessary requirements of seriousness and commercial reliability;
- with entities that, even indirectly, hinder human development and contribute to a lack of respect for human dignity and individual personality and/or to violate the fundamental rights of the person (e.g. exploiting child labour, facilitating migrant smuggling or sex tourism, etc.);
- with subjects who do not formally commit themselves - for example in the contractual field - to comply with current legislation on labour - with particular attention to child labour - and the health and safety of workers. Professionalism, competence, availability, respect and fairness are the guiding principles and the style of conduct to be followed in relations with customers.

In order to protect the company's image and reputation, it is essential that relations with customers, including advertising messages, are based on:

- full transparency and fairness;
- compliance with the law;
- independence from all forms of conditioning, both internal and external. Product suppliers, service providers and professionals who, for various reasons, have relations with FLEXTECH, recognize and share the ethical and behavioral principles adopted with this Code. Suppliers are selected on the basis of protocols that govern their accreditation, provide for periodic satisfaction checks and include the clauses and methods of quality control and verification of the measures adopted in accordance with the law to protect consumers. The assumption of commitments and the management of relations with current and potential suppliers must be carried out in compliance with the contents of this Code of Ethics regarding the prevention of conflicts of interest and specifically, the persons responsible for and in charge of the purchasing process:
 - are required to comply with the principles of impartiality and independence in the exercise of the tasks and functions entrusted to them, operating on the basis of the adoption of objective and documentable criteria;
 - they must remain free from personal obligations to suppliers; any personal relationships of employees and/or consultants with suppliers must be reported to the management to which they belong and to the Supervisory Body before any negotiation;
 - they must maintain relationships and conduct negotiations with suppliers in a manner that creates a solid basis for mutually beneficial and appropriately long-term relationships in the interest of the Company;
 - they are strictly required to immediately report to the Supervisory Body any attempt or case of alteration of normal business relations; • must not offer goods or services, in particular in the form of gifts, to personnel of other companies or entities in order to obtain confidential information or significant direct or indirect benefits, for themselves or for the Company, without prejudice to the provisions of the general provisions of this Code of Ethics;
 - they must not accept goods or services from external or internal parties in exchange for the release of confidential information or the initiation of actions or conduct aimed at favoring such subjects, even if there are no direct repercussions for the Company.

Any conduct contrary to the letter and spirit of the Code of Ethics will be sanctioned in a manner proportionate to the seriousness of any infringements committed, in accordance with the provisions of the disciplinary system defined by the Organizational Model, of which the Code of Ethics is an integral part. Infringements by third parties will be sanctioned according to the criteria indicated in the specific contractual clauses provided.

2.6 Correctness in administration

FLEXTECH pursues its purposes in compliance with the law, the Articles of Association and company regulations, ensuring the proper functioning of corporate bodies and the protection of property rights and safeguarding the integrity of assets. FLEXTECH condemns any conduct, by anyone, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other communications required by law. Relations with the media are carried out exclusively by the function responsible for this purpose. All communication interventions must be authorized in advance. FLEXTECH requires that Directors, employees and Collaborators behave correctly and transparently in the performance of their duties, especially in relation to any request made by the Board of Directors, the other corporate bodies, the Independent Auditors and the Supervisory Body in the exercise of their respective institutional functions. The corporate bodies, their members, employees and collaborators, on the occasion of audits and inspections by the competent public authorities, must comply with the protocols and procedures that govern such situations, maintaining an attitude of maximum availability and collaboration without hindering in any way the functions of the inspection and control bodies. The Recipients of the Code are required to avoid all situations and activities in which there may be a conflict with the

interests of the Company or that may interfere with their ability to take decisions in the best interests of the Company itself in an impartial manner and in full compliance with the rules of the Code of Ethics. The Addressees of the Code must also refrain from taking personal advantage of acts of disposal of corporate assets or business opportunities of which they have become aware in the course of carrying out their duties. Personnel with top management functions, called upon to make decisions in business when there is a clear conflict between personal interests and those of the Company, must:

- communicate the existence and characteristics of such conflict to his/her hierarchical superior and to the Supervisory Body, if established;
- refrain from exercising their decision-making role and delegate this role to others in charge of the corporate organization;
- In the event that the aforementioned abstention/delegation is not possible, involve other parties in the decision-making process in order to give greater transparency to the process itself.

FLEXTECH acts in full compliance with competition law; therefore, it is forbidden for the Addressees of this Code to carry out acts and conduct that are detrimental to competition, including corruption between private individuals.

2.7 Protection of the person and individual personality

FLEXTECH condemns any behaviour that is detrimental to the individual personality, physical, cultural and moral integrity of the people with whom it interacts, and undertakes to combat any behaviour of this nature, including the use of irregular work. FLEXTECH therefore condemns any form of physical or psychological abuse committed on minors, as well as any form of prostitution and/or child pornography. FLEXTECH also condemns slavery and the use of child labour and therefore undertakes not to use or support such forms of labour. Any form of discrimination and harassment on grounds of race, sex, religion, age, sexual orientation, disability, or other aspects of a personal nature unrelated to work must be excluded in the workplace. FLEXTECH prohibits any conduct carried out in order to harass an employee or collaborator. Illegal conduct and abuse of any kind in the workplace, threats or aggression against employees, collaborators or the Company's assets and property are prohibited. FLEXTECH is committed to respecting the privacy of employees and collaborators, through the adoption of methods of processing and storing personal and sensitive data that comply with current legislation and give guarantees of effectiveness.

2.8 Protection of Human Resources, Health and Safety in the Workplace and Environment

Human resources are recognized as a fundamental and indispensable factor for the company's development. FLEXTECH safeguards professional growth and development in order to increase the wealth of knowledge possessed in compliance with current legislation on individual personality rights, with particular regard to the moral and physical integrity of employees and collaborators. Staff are employed exclusively on the basis of regular employment contracts and no form of irregular work is tolerated. The candidate must be aware of all the characteristics pertaining to the employment relationship. In addition to laws and collective bargaining agreements, the recognition of salary increases or reward and incentive systems and access to higher positions or roles (promotions) are linked to the individual merits of employees. FLEXTECH is committed not to fostering forms of cronyism and nepotism. FLEXTECH also undertakes to employ non-EU foreign citizens only if they have a regular and valid residence permit, or who have in any case requested its renewal within the terms of the law. FLEXTECH adopts every activity capable of preventing risks to the environment and to safety and health at work, in strict compliance with current legislation. In this sense, FLEXTECH is committed to preparing and maintaining safe and healthy work environments in compliance with current accident prevention legislation and to spread and consolidate a culture of safety and health at work by developing risk awareness, promoting responsible behavior by all employees. To this end, it carries out technical and organizational interventions, through the introduction of:

- a system for managing risks, security and assets to be protected;
- control and updating of the system to protect against safety-related risks; training and communication interventions.

All FLEXTECH personnel are required to adopt behaviors that respect the environment, safety and health at work. FLEXTECH manages its activities by pursuing excellence in the field of environmental protection, with the goal of continuously improving its performance in this field. To this end, commitments include:

- compliance with national and EU legislation and regulations in the environmental field;
- pollution prevention;
- raising the awareness of employees and collaborators on environmental issues (with particular reference to waste management).

The company encourages gender equality and ensures equal treatment for the same job and level among employees of different genders. Also for this purpose, two company figures have been specifically identified as referents for female company employees, in order to facilitate the emergence of situations of hardship or environmental difficulty between genders.

2.9 Use and Safeguarding of Company's Property

The Recipients are required to operate with due care and diligence to protect the assets owned by the Company, through responsible conduct and in line with the operating procedures set up to regulate their use, documenting, where appropriate, their use. The Recipients are responsible for the protection of the resources entrusted to them and have the duty to promptly inform the relevant structures of any threats or harmful events to the Company itself or its assets. In particular, it is mandatory to:

- avoid improper use that may cause undue costs, damage or reduction in efficiency or in any case contrary to the interest of the Company;
- scrupulously adopt the provisions of internal policies and procedures, even if not formalized, in order not to compromise the functionality, protection and security of the Company's IT systems, equipment and systems;
- always operate in compliance with the safety standards provided for by law and internal procedures, in order to prevent possible damage to things, people or the environment;
- use the Company's assets, of any type and value, in compliance with the law, internal regulations, and the principles of this Code of Ethics;
- use the Company's assets exclusively for purposes connected with and instrumental to the exercise of the work activity; in any case, it is prohibited, except when provided for by specific regulations or corporate agreements, the use or transfer of the goods by third parties or to third parties, even temporarily;
- operate, as far as possible, in order to reduce the risk of theft, damage or other threats to the assets and resources assigned or present, informing the departments in charge in a timely manner in the event of abnormal situations.

2.10 Corporate ESG policies and guiding principles

In the ESG area, FLEXTECH takes into account taking actions aimed at:

- steer financial flows towards sustainable investments;
- manage more effectively the financial risks arising from climate change, resource consumption, environmental degradation and social inequalities;
- Improve transparency and encourage a long-term approach to the company's own financial activities.

The long-term challenges and changes in the scenario are also accompanied by the need for companies to identify the following aspects:

- Environmental Risks
- Social Risks

- Governance risks
- may entail economic and financial risks
- globalisation and political risks (such as the war in Ukraine).

FLEXETCH has therefore reviewed the relationship with the available resources, whatever the type of product or outlet market in which it is involved, assessing all the risks mentioned above in order to have an adequate analysis of the strategic threats towards the creation of value.

Therefore, the company supervises all phases of the business processes and the supply chain, taking appropriate measures and taking into account the severity and probability of the different effects, the measures available in specific circumstances and the need to define priorities:

- integrate the ability to control into company policies;
- identify actual or potential adverse effects on human rights and the environment;
- prevent or mitigate potential effects;
- to put an end to or minimise the real effects; establish and maintain a complaints procedure;
- monitor the effectiveness of due diligence policies and measures;
- publicly account for the duty of care.

3 ANTI-MONEY LAUNDERING

3.1 Commitment to combating money laundering and illicit financing

FLEXTECH is committed to complying with all national and international anti-money laundering regulations and regulations. FLEXTECH's staff and collaborators must not in any way and under any circumstances receive or accept the promise of cash payments or run the risk of being involved in matters related to money laundering from illegal or criminal activities. Before establishing relationships or entering into contracts with non-occasional suppliers and other long-term business partners, FLEXTECH must ensure the moral integrity, reputation and good name of the business counterparty.

4 CYBERCRIME

4.1 Commitment to the truthfulness of information and relations with the public administration

In the activities carried out on behalf of FLEXTECH, the Recipients must not declare - and will take all the necessary precautions to ensure that they are not declared - falsehoods in a public electronic document having probative value. The Recipients may not have access except within the limits of the authorizations granted by the persons in charge and with appropriate powers to the FLEXTECH computer or telematic system protected by security measures. The Recipients will also refrain from illegally holding and disseminating computer access codes to FLEXTECH's systems that they may be in possession of for reasons related to their collaboration with FLEXTECH itself. The Recipients are obliged to use codes, keywords or other suitable means to access a computer system protected by security measures exclusively within the limits and for the specific purposes to which they are required for their duties or for their contractual obligations, without reproducing, copying, disseminating or communicating them. They must refrain from damaging the computer system of FLEXTECH (or of other parties, in the activities carried out on behalf of FLEXTECH), the information, data or programs contained therein or from facilitating the interruption, total or partial, or alteration of its operation. It is forbidden for the Recipients to intercept communications relating to the computer system of FLEXTECH (or of other

subjects, in the activities carried out on behalf of FLEXTECH) or between two systems or to prevent or interrupt the communications themselves; to install equipment designed to intercept, prevent or interrupt communications relating to a computer or telematic system or between several systems. It is also the obligation of the Recipients to refrain from destroying, deteriorating, erasing, altering or suppressing information, data or computer programs belonging to others or owned by the State or in any case of public utility, respecting the terms of the contract contained in the relevant licenses and using them to the extent and within the limits established by the relevant owners. Finally, the Recipients undertake not to introduce into FLEXTECH's computer system or transmit from FLEXTECH's computer system data, information, or programs suitable for destroying, damaging or rendering totally or partially unusable (or seriously hindering its operation) FLEXTECH's computer system, third-party computer systems or computer systems of public utility.

5 PROTECTION OF PRIVACY AND CONFIDENTIAL INFORMATION

5.1 Confidentiality of Recipients and Employees

Each Recipient is required to protect the confidentiality and confidentiality of the information relating to FLEXTECH learned in the course of or on the occasion of the activity provided in its favor. In compliance with current legislation and GDPR EU 679/2016, all information, knowledge and data acquired or processed by the Recipients through their activities may not be used, communicated or disclosed without the express authorization of the data controller. Each Recipient shall:

- acquire and process only the information and data necessary and directly related to its business;
- store such data and information in such a way as to prevent unrelated third parties from becoming aware of them;
- communicate and disclose the data/information within the framework of the procedures established by the Data Controller Company and subject to the authorization of the Data Controller, through the person delegated to do so;
- evaluate and determine the confidential and confidential nature of the information in accordance with the procedures established by the data controller;
- comply with any confidentiality obligations even after the termination of the relationship with the data controller, in accordance with current legislation and/or contractual commitments previously undertaken.

FLEXTECH's activity requires the processing of data – meaning any operation or set of operations, carried out even without the aid of electronic tools, concerning the collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, cancellation and destruction of data, even if they are not registered in a database – subject to protection by current privacy legislation. FLEXTECH is particularly attentive to aspects concerning the privacy of staff/collaborators/customers/users and any other subject interested in the processing of their personal data by the company itself. Specific security measures are observed to prevent the loss, illicit or incorrect use of the data being processed by FLEXTECH and/or unauthorized access to the company's website. The processing of personal data is permitted only to authorized personnel and in compliance with the rules and procedures established in accordance with current legislation. FLEXTECH undertakes to protect the information and data relating to the Recipients and third parties, and to avoid any improper use of the same.

Reports within the procedure referred to in Legislative Decree 24/2023 are treated with absolute security, anonymity and encrypted in accordance with the law.

6 DISCLOSURE OBLIGATION

6.1 Reporting

Any conduct contrary to the spirit of the code must be reported to the relevant bodies, to the Supervisory Body, if appointed, using the procedures provided for in the Model, if established and adopted. Whistleblowers will be protected against any form of retaliation, discrimination or penalization; the confidentiality of the identity of the whistleblower will also be guaranteed, without prejudice to legal obligations and the protection of the rights of the Company or of the persons wrongly accused and/or in bad faith.

Reports received on the IT channel specifically set up in accordance with the provisions of Legislative Decree 24/2023 will be managed by the company team specifically dedicated in accordance with the law.

7 DISCIPLINARY SYSTEM

7.1 Disciplinary sanctions

The principles expressed in this Code of Ethics are an integral part of the conditions that govern the employment relationship in the Company; Any violations will give rise to the application of sanctions in accordance with the current sanctioning system provided for and commensurate with the seriousness of the violation. Failure to comply with the precepts contained in this Code of Ethics may result in the termination of the existing relationship with third parties. On the basis of an explicit contractual provision, FLEXTECH undertakes to provide for and impose, in compliance with the provisions of the company disciplinary system and the procedures of the adopted CCNL, sanctions proportionate to the seriousness of the violations committed. In particular, violations of the provisions and principles established in the Code of Ethics may result in the application of sanctions and/or further measures, including precautionary measures, expressly indicated in the Organizational Model pursuant to Legislative Decree 231 of June 8, 2001, if adopted. Violations of the Code of Ethics by members of the corporate bodies may result in the adoption by the competent corporate bodies of the measures deemed most appropriate among those provided for by law.

It is acknowledged that the disciplinary code implements the provisions of Legislative Decree 24/2023 on the subject of so-called whistleblowing reports.

8 IMPLEMENTATION OF THE CODE OF ETHICS

8.1 Internal Control

The correct and effective application of the Code of Ethics is only possible through the commitment and collaboration of all those who work on behalf of FLEXTECH in collaboration with the bodies responsible for the implementation and control process.

8.2 Ethics training

FLEXTECH, in agreement with the Supervisory Body, undertakes to communicate the values and principles contained in the Code of Ethics to all interested parties, so that they can be applied in corporate management. All personnel, persons belonging to corporate bodies, auditors, consultants, and more generally all Recipients of this Code must read the Code and undertake to follow the provisions and rules contained therein. The dissemination of the Code of Ethics and company procedures to the Recipients is ensured through appropriate communication tools. FLEXTECH ensures the publication of the Code of Ethics on the internet on the www.flextechsrl.com website.

FLEXTECH ensures that the Code of Ethics is effectively implemented through the continuous promotion of the most appropriate communication, training and advisory support initiatives for the Recipients.

Villanova Mondovì, 14 December 2023

FLEXTECH SRL
The Chief Executive Officer