

Code of Business Conduct

Recipients All employees

Archive All the Principles, Policies, Standards and Instructions of FLEXTECH SRL can be found in the company intranet archive.

Copyright and confidentiality All rights are owned by FLEXTECH SRL

INDEX

Introduction	pag.	2
Compliance with laws, rules and regulations	pag.	2
Conflict of interest	pag.	2
Leadership, political and other external positions	pag.	2
Family members and relatives	pag.	3
Business Opportunities	pag.	3
Insider Trading	pag.	3
Antitrust and Fair Dealing	pag.	3
Confidential information	pag.	3
Fraud, protection of company assets, accounting	pag.	4
Corruption	pag.	4
Gifts, Lunches, Entertainment and Grants	pag.	4
Discrimination and harassment	pag.	5
Failure to comply with the rules contained in the Code and Third Parties	pag.	5
Reporting of inappropriate, illegal or non-compliant behaviour (whistle-blowing)	pag.	5
Relationships in the company	pag.	6
Attachments		

Introduction

Since its establishment, FLEXTECH has adopted business practices based on integrity, honesty, fairness and compliance with all applicable laws. FLEXTECH employees have always supported and shared this commitment in their daily activities.

The company's Code of Ethics, as well as FLEXTECH's Business Principles, provide for certain values and principles to be respected worldwide. This Code of Conduct sets out and facilitates the continuous implementation of these principles, setting minimum and non-negotiable standards of conduct in the main areas of activity.

The purpose of this Code is not to regulate all possible situations that may arise, but to serve as a reference framework for their evaluation. Employees and collaborators will still have to ask for assistance in case of doubt about the correct behavior to adopt in a given situation, since each of them has the responsibility to "do the right thing", a responsibility that cannot be delegated by anyone.

Employees should always be based on the following principles:

- avoid any conduct that could damage or endanger FLEXTECH or its reputation;
- maintain honest and law-abiding behavior;
- putting the interests of the company before personal or other interests.

For the purposes of this Code, the term "employees" includes all types of employees, managers and directors of FLEXTECH and its subsidiaries, if any.

Compliance with laws, rules and regulations

All FLEXTECH employees must present themselves at the company in suitable and suitable conditions for work, for their own safety and that of others. A state of drunkenness or in any case a state that can be defined as altered or not normal is not tolerated. It is not allowed to introduce alcohol into the company and even less so their consumption.

Improper attitudes, offensive or discriminatory behaviour, blasphemies, insults and all those acts that are unsuitable, inappropriate and not respectful of decency, hygiene and morality will be punished in accordance with the law and the company disciplinary code and in any case are not accepted and tolerated by FLEXTECH, which invites its employees not to passively suffer such behaviour of other people in the company, are also third parties temporarily present in the workplace.

FLEXTECH and its employees are obliged to comply with the law. Compliance with all applicable laws and regulations must never be compromised. In addition, employees will have to comply with internal rules and regulations, as required by the circumstances and the evolution of the company organization. These internal rules are specific to the company and may in any case provide for stricter obligations than those established by law.

Conflict of interest

A conflict of interest occurs when the personal interests of an employee or the interests of a third party conflict with the interests of FLEXTECH. In such a situation, it can be difficult for an employee to behave in a manner that is totally in accordance with FLEXTECH's interests.

Employees should avoid conflicts of interest whenever possible.

In the event of a conflict of interest or in the event that an employee faces a situation of potential conflict of interest, the employee must report the situation to his or her direct supervisor and/or Human Resources, in order to address the situation in a fair and transparent manner.

Leadership, political and other external positions

You must not carry out activities outside of FLEXTECH if these may interfere with the responsibilities of employees towards the company or if they create risks to its reputation or may in any way conflict with the interests of the same.

In case of doubts about the lawfulness of a particular activity, employees should seek an opinion from Human Resources.

The following positions and activities are considered acceptable only with the authorization of a member of the Board of Directors with the appropriate powers: member of the Board of Directors, manager, employee, partner, consultant, director of a public company. Membership of the Board of Directors of companies listed on the Stock Exchange requires the prior authorization of the Board of Directors of FLEXTECH itself.

Being or becoming a politically exposed person (see Legislative Decree 231/2007) must be reported compulsorily and immediately to Human Resources, which will adopt any precautions and precautions in accordance with the law.

Permission will not be granted if the position or activity could conflict with the interests of FLEXTECH.

If the company does not ask to take on a particular position or carry out a certain activity, employees will accept external activities or positions at their own risk and expense, dedicating only their free time to them.

Family members and relatives

Direct relatives and partners of employees may only be hired as employees or consultants if the appointment is based on specific skills, performance, skills and experience and provided that there is no direct or indirect hierarchical relationship between the employee and his or her relative or partner.

The above principles of impartial employment apply to all aspects of the employment relationship, including pay, promotions, and transfers, even if the relationship arises after a certain employee has joined the company.

It is possible to give priority to the children of FLEXTECH employees for internships, training, collaboration during holidays and for similar fixed-term assignments, provided that they have the same qualifications and conditions as other candidates.

Business Opportunities

Employees should not compete with the company, nor should they take advantage of the business opportunities they identify during their employment, unless the company expressly waives any interest in such opportunities.

If any employee is interested in developing business opportunities that may be of interest to the company, they should inform their direct supervisor or in any case the Human Resources department, which will submit the matter to the Management to understand whether or not the company is interested in such opportunities.

In the event that the company does not express interest in these opportunities, the employee will be able to exploit them to his advantage only if this does not put him in competition with the activities of the company itself and in any case taking note of what is indicated in the previous points.

Insider Trading

FLEXTECH prohibits the purchase and sale of shares or securities of any company belonging to the GINEGAR PLASTIC PRODUCTS LTD group - parent company of FLEXTECH - on the basis of potentially relevant information with reference to prices, which is not in the public domain. Failure to comply with this rule not only involves disciplinary sanctions, but could also result in criminal prosecution.

If employees have any doubts about the interpretation or applicability of the *Insider Trading* rules, they should contact the Human Resources department or the company management.

Antitrust and Fair Dealing

FLEXTECH is ready to compete successfully in the business world and does so in full compliance with all laws governing competition law and commercial fairness. Employees must therefore always comply with the following rules:

- commercial policies and prices will always be established independently and will never be agreed, formally or informally, with competitors and third parties not connected to the company, either directly or indirectly;
- customers, territorial areas and product distribution markets will never be shared in concert between FLEXTECH and its competitors, but will always be the result of fair competition;
- Customers and suppliers will always be treated fairly.

Confidential information

Confidential information is defined as all information of corporate relevance that is not in the public domain. Such information includes trade secrets, pricing, business, marketing and service plans, customer and supplier preferences, engineering and manufacturing projects, product recipes, projects, databases, records, salary data and any other financial or other data not disclosed.

For FLEXTECH, the continuity of positive results depends on the use of its confidential data and the fact that it is not disclosed to third parties. Employees shall not disclose confidential data, nor permit its disclosure, unless required by law or expressly authorized in advance by Management in writing. This obligation continues even after the end of the employment relationship. In addition, employees must do everything possible to avoid inadvertent disclosure of data, paying particular attention when storing or transmitting data, especially confidential data.

All employees, especially those who work in Marketing, Sales and Purchasing or who are in regular contact with competitors, must ensure that they are familiar with competition rules. If in doubt, they should contact Human Resources for advice and training on competition rules.

FLEXTECH recognizes the same interest in third parties in protecting their confidential data. In cases where certain third parties, such as joint *venture partners*, suppliers, distributors or customers, share certain

confidential data with FLEXTECH, it will be treated with the same care as FLEXTECH's data. In the same spirit, employees will also protect confidential data of third parties that they have come into possession of during previous employment relationships.

Fraud, protection of company assets, accounting

Employees should never get involved in fraud or other dishonest behavior involving property or assets, or the financial and accounting reports of FLEXTECH or any third party. These acts not only result in disciplinary sanctions, but could also lead to criminal prosecution against the person responsible.

FLEXTECH's financial data forms the basis for managing the company's activities and fulfilling its obligations to the various stakeholders. These data must therefore be precise and in line with the Accounting Standards required by the regulations and regulations of the Group.

For the purposes of preventing and combating corruption, FLEXTECH requires that all business transactions and financial flows be properly recorded, classified and documented, including those relating to the company's provision of gifts, hospitality, travel, entertainment, scholarships, grants and donations to charitable organisations.

Corruption

Corruption perpetuates poverty, undermines economic development and distorts competition. FLEXTECH supports the international fight against corruption and adopts the principles of the 'UN Global Compact'. FLEXTECH is committed to promoting a strong work ethic and categorically prohibits its employees, service providers and agents from engaging in incidents of corruption, or engaging in conduct that could appear or be interpreted as illegal activities. Corruption, including between private individuals, is defined as an offer or acceptance of gifts, loans, compensation, prizes or other benefits, or as an incentive to carry out activities that are contrary to the law or that violate the relationship of trust in the execution of business activities.

Employees must never, directly or through intermediaries, offer or promise personal or illicit benefits, financial or otherwise, in order to obtain or maintain a business or other benefit through third parties, whether public or private. Nor will they have to accept such benefits in exchange for preferential treatment of third parties. In addition, employees should avoid any activity or behavior that could suggest or suspect such conduct or intention.

Employees should be aware that offering or accepting such illicit benefits in order to influence the decisions of beneficiaries, even if no government officials are involved, could result in disciplinary sanctions and even criminal prosecution. Illicit benefits can consist of anything that has value to the beneficiary, including any employment or consultancy contracts for closely related third parties.

Employees will have to safeguard and make appropriate and efficient use of FLEXTECH's properties. All employees shall endeavour to protect FLEXTECH's property against loss, damage, misuse, theft, fraud, misappropriation and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or exclusive data and information systems.

To the extent permitted by applicable law, the Company reserves the right to monitor and verify how its assets are used by employees, including by verifying all emails, data and files in the Company's network of terminals.

Employees should be aware that election laws in many jurisdictions typically prohibit companies from paying grants to political parties or candidates. FLEXTECH has adopted a policy of not granting such grants. Any such contributions and any exceptions to this policy must be approved by the company's Board of Directors.

Gifts, Lunches, Entertainment and Grants

Employees should not allow themselves to be influenced by agreeing to receive favors, nor should they try to illicitly influence others by offering favors. Employees may only offer or accept meals of a reasonable size or symbolic gifts appropriate to the circumstances and must not accept or offer gifts, lunches or entertainment where this could create the impression that they want to illegally influence the relevant business relationship.

Gifts offered to third parties (customers, distributors, agents, suppliers of goods and services, government officials, physicians or other professionals) must be reasonable, modest and appropriate to the circumstances and must not give the impression of exercising unfair influence or seeking an illegitimate advantage. As a rule, gifts should only be offered for normal business activities or cultural events and should not be in the form of cash or equivalent. No gift, of any nature, shall be offered to the competent authorities or government officials for a decision regarding FLEXTECH, pending or imminent.

FLEXTECH employees should never pay or resort to third parties to pay unofficial bonuses to government officials or employees in order to secure or expedite routine administrative practices, such as customs clearances, visas, permits, or licenses.

To assess a situation in the light of the above, employees must avoid even the suspicion of illegal agreements. In case of doubt, the employee should ask his direct superior or the Human Resources

department for directions.

No employee may offer or accept from any third party any gift in any of the following forms, regardless of value: money, loans, bribes, monetary benefits of a similar nature.

FLEXTECH may offer lunches and overnight stays of a reasonable and appropriate size to third parties attending business meetings and gatherings or events that are organized, supported or sponsored by FLEXTECH, as long as they contribute to and are proportionate to the underlying legitimate purpose. Entertainment, local tours, cultural and sporting events and similar activities may be offered to third parties in a reasonable and appropriate manner only in connection with meetings, conferences or corporate events organized, supported or sponsored by the company. However, they must always be linked to a corporate event.

FLEXTECH may offer scholarships, grants, donations to charitable organizations, or non-commercial sponsorships to support the development of knowledge in science, the environment, and technology, or to support other socially beneficial purposes. They should never be granted to procure an improper advantage for the company, nor should they be given in exchange for the commitment of an individual or organization to recommend or promote FLEXTECH's products. When a market or business provides this type of financial support, appropriate verification and approval procedures must be applied, including an assessment of the possible beneficiary, its background, suitability for the intended purpose and social and public responsibility benefits.

The company management must be involved in the verification and selection process. All scholarships, grants, charitable donations and any non-commercial sponsorship must be approved by the Management or a senior manager expressly authorized to do so and always documented in writing.

Discrimination and harassment

FLEXTECH respects the dignity, privacy and personal rights of every employee and is committed to avoiding any incident of discrimination and harassment in the workplace. Employees must therefore not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation or engage in any type of verbal or physical harassment based on any of the above factors or other grounds.

Employees who believe that the above principles are not being respected in their workplace are invited to report it to Human Resources as a matter of urgency.

Failure to comply with the rules contained in the Code and Third Parties

FLEXTECH is extremely cautious in its dealings with third parties, which can never be used to pay bribes or engage in acts of corruption. FLEXTECH requires its suppliers, distributors and third parties acting on its behalf to behave with integrity and to comply with anti-corruption laws. The decision to buy from a certain supplier, to use a service provider or to appoint a commercial agent or distributor must follow a proper due diligence process that complies with the company's principles. If it emerges, or appears probable, during the relationship with a third party, that he or she is following unfair or illegal practices, you should immediately consult your direct superior or the Human Resources department for guidance on how to behave.

It is the responsibility of each employee to ensure full compliance with all the provisions contained in this Code and to ask for clarifications when necessary from their direct manager or Human Resources. When in doubt, employees should always follow the fundamental principles specified in the introduction to this Code.

Any failure to comply with this Code may lead to disciplinary action, which may even lead to dismissal and, if justified, to legal action and criminal sanctions.

Reporting of inappropriate, illegal or non-compliant behaviour (whistle-blowing)

Employees must report any practices or behaviors deemed not in compliance with the provisions of this Code, or even illegal, to their direct supervisor or Human Resources. If necessary, given the nature of the report, they can be transmitted directly to the highest levels of the company.

When appropriate, reports may be submitted confidentially or via the employee-only communication channels.

All reports will be adequately investigated. FLEXTECH prohibits any form of retaliation against any employee who makes such reports in good faith, while protecting the rights of the persons reported.

Relationships in the company

Please read the provisions of art. 55 and 58 of the CCNL CHIMICA GOMMA PLASTICA PMI applied by the company, attached.

Villanova Mondovì, 13 January 2023

The Chief Executive Officer

(Omar Turco)