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QUALITY SYSTEM CERTIFICATION
DNV·GL
ISO 9001:2008

Code of Ethics

1 GENERAL

1.1 Foreword

FLEXTECH SRL (hereinafter also the "Company" or "FLEXTECH") carries out its business activities by pursuing the creation of sustainable value in the long term, in compliance with the law, ethical principles, fundamental rights of the person, the environment, the safety of workers and products, as well as the principles of fairness and fair competition.
FLEXTECH's mission consists in the development, production and marketing of plastic films and technical products according to criteria of quality, innovation, reliability, safety and sustainability, ensuring compliance with applicable legislation and the commitments made to its stakeholders.
FLEXTECH considers integrity, fairness, transparency, competence, responsibility, credibility and reputation to be essential elements of its corporate assets.
This Code of Ethics therefore defines the principles and rules of conduct to be complied with by corporate bodies, management, employees, collaborators and, as far as applicable, all persons who operate directly or indirectly on behalf of or in the interest of the Company.

1.2 Purpose and scope

This document has been prepared by FLEXTECH with the aim of defining a Code of Conduct, formed by the values characterizing the Company, which must act 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, the Code) defines, therefore, 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 subjects, 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 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 undertake or continue any relationship with anyone who demonstrates that he or she does not agree with the content or spirit of this Code, or violates its principles or rules of conduct.

2 COMPANY VALUES

2.1 Ethical principles, human rights and corporate responsibility

FLEXTECH carries out its activities according to principles of legality, integrity, good faith, loyalty, fairness, transparency, responsibility and respect for the dignity of the person.
Conduct attributable to corruption, bribery, fraud, collusion, embezzlement, illicit enrichment or other conduct aimed at obtaining undue advantages for the Company or third parties is prohibited.
FLEXTECH recognizes and promotes the principles contained in the Universal Declaration of Human Rights, the Ten Principles of the United Nations Global Compact, the Fundamental Conventions of the International Labour Organization (ILO) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

FLEXTECH is aware of the fundamental social role connected to its business activity. FLEXTECH promotes and demands models of ethical behavior in the performance of work activities, inspired by the principles of contractual good faith, loyalty, fairness and transparency. The legitimacy of any behavior adopted must be – from a formal and substantial 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 configured 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 in 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 we are not jointly responsible for the abuse of human rights standards
3. To 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 employment
7. Support a preventive approach to environmental challenges
8. Undertake 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 Organize, 1948
- C98 - Convention on the Right to Organize and Collective Bargaining, 1949
- C100 - Equal Pay Convention, 1951
- C105 - Convention on the Abolition of Forced Labour, 1957
- C111 - Discrimination (Employment and Occupation) Convention, 1958
- C138 - Minimum Age Convention, 1973

- C182 - Worst Forms of Child Labour Convention, 1999

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

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

FLEXTECH does not use materials and raw materials of which:

- Regulation of the Ministry of the Administration of Denmark No. 1082 of 13 September 2007
- pursuant to EEC Regulation no. 2008/0240 (COD) of 27 May 2011
- to 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 1992 Kyoto Protocol, first and second periods
- to EEC Regulation no. 67/548
- to EEC Regulation no. 1272/2008
- to the list of ozone-depleting substances as required by the Government of the Chinese People, first series (revised in 1998)
- Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024, with the related Guidelines on the application of Regulation (EU) 2024/3015.

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

2.2 Compliance with the law and combating forced labour

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

FLEXTECH rejects any form of forced, compulsory or forced labour and operates in compliance with Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024, which prohibits products obtained with forced labour on the Union market, as well as taking into account the relevant Guidelines of the European Commission on the application of Regulation (EU) 2024/3015, adopted by the Commission on 26 June 2026 and published in the Official Journal of the European Union on 3 September 2026.
FLEXTECH does not allow products obtained, in whole or in part, by forced labour to be placed or made available on the European Union market, or exported from the Union.

The Company adopts a proportionate and risk-based approach to its knowledge and management of its supply chain, with particular attention to the countries, sectors, products, raw materials, processes and suppliers most exposed.
To this end, FLEXTECH may, depending on the risk:

- acquire information on the origin of raw materials and products;
- request information and declarations from its suppliers;
- carry out supply chain checks;
- request corrective actions;
- suspend supplies;
- in the most serious or irremediable cases, terminate the business relationship.

Suppliers and business partners are required to cooperate in the audits reasonably requested by the Company.

2.3 Relations with the Public Administration and the Judicial Authority

FLEXTECH pursues the objective 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 subjects that can be configured as 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 actions. Relations with the Public Administration are maintained by the company representatives designated for the purpose. All documentation summarizing the procedures through which FLEXTECH has come into contact with the Public Administration must be duly collected and kept. The operations implemented 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 relative decision-making, authorization and execution process. Each transaction 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 motivations and ii) identify the persons who authorised, carried out, recorded and verified the operation itself. The Recipients of this Code are not permitted, either directly or indirectly, or through an intermediary, to offer or promise money, gifts or compensation, in any form, or to exert unlawful pressure, or to promise any object, service, performance or favour to managers, officials and employees of the Public Administration, or to persons in charge of public services and their relatives or cohabitants, in order to induce 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 damaging a party in a civil, tax, criminal or administrative proceeding by bringing a direct or indirect advantage to the Company must also be considered as such). Only forms of gifts, of negligible value, are permitted, provided that they are also not aimed at inducing the aforementioned subjects to perform acts contrary to or in conformity 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 their direct superior and the Supervisory Body so that the most appropriate initiatives to be taken can be identified. The provisions indicated in the preceding points must not be circumvented by resorting to different forms of aid and contributions which, under the guise of hiring, assignments, consultancy, advertising or others, have purposes similar 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 both parties. It

is not permitted to use or submit statements and documents attesting to untrue facts and information, or to 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, financing or other disbursements, however denominated, 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 an IT 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 achieve 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 conscience, good faith and according to truthfulness; it is forbidden for the Company to induce or encourage employees and/or collaborators not to make/produce the aforementioned statements, or to make them false.

2.4 Fairness in external relations

The members of the corporate bodies, employees and, in general, the Recipients of this Code must behave with the utmost correctness 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 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 hinders human development and contributes to violating the fundamental rights of the person. FLEXTECH undertakes to comply with all national and international rules and provisions on the fight against money laundering. The Recipients must not, in any way and under any circumstances, be involved in events related to the laundering of money deriving from criminal activities or the receipt of goods or other utilities of illegal origin. They are also required to verify in advance the information available on commercial counterparts, suppliers, partners, collaborators and consultants, in order to ascertain their respectability before establishing business relationships with them.

2.5 Activation and maintenance of business relationships

In initiating business 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 persons involved in illegal activities, in particular related to the crimes provided for by Legislative Decree no. 231/2001 and, in any case, with persons who do not meet the necessary requirements of seriousness and commercial reliability;
- with subjects who, 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, favouring migrant smuggling or sex tourism, etc.);
- with parties who do not formally commit themselves - for example in the contractual context - to comply with the current legal regulations 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 behaviour to be followed in relations with customers. To protect the image and reputation of the company, it is essential that relations with customers, including advertising messages, are based on:
- full transparency and fairness;

- compliance with the law;
- independence from any form of conditioning, both internal and external. Product suppliers, service providers and professionals who, in various capacities, have relations with FLEXTECH, recognise and share the ethical principles and behaviour 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 for quality control and verification of the measures adopted by law to protect consumers. The assumption of commitments and the management of relationships with suppliers, current and potential, must be carried out in compliance with the contents of this Code of Ethics on the prevention of conflicts of interest and specifically, the persons responsible for and responsible for the purchasing process:
- they are required to comply with the principles of impartiality and independence in the exercise of the tasks and functions entrusted, operating on the basis of the adoption of objective and documentable criteria;
- they must remain free from personal obligations towards 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 negotiations;
- maintain relationships and conduct negotiations with suppliers in a manner that creates a solid basis for mutually beneficial relationships of adequate duration, 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; • they must not offer goods or services, in particular in the form of gifts, to personnel of other companies or entities 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 Organisational 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 envisaged.

2.6 Fairness in administration

FLEXTECH pursues its purposes in compliance with the law, the Articles of Association and corporate 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 carried out, 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 maintained exclusively by the function assigned to do so. All communication interventions must be authorized in advance. FLEXTECH requires that the Directors, employees and Collaborators behave correctly and transparently in the performance of their functions, 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 checks and inspections by the competent public authorities, must comply with the protocols and procedures governing 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 all activities in which a conflict with the interests of the Company may concretely arise or that may interfere with their

ability to take, in an impartial manner, decisions in the best interest of the Company itself and in full compliance with the rules of the Code of Ethics. The Recipients of the Code must also refrain from taking personal advantage of acts of disposal of company 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 activities when there is a clear conflict between personal interests and those of the Company must:

- communicate the existence and characteristics of this conflict to their hierarchical superior and to the Supervisory Body, if established;
- refrain from exercising their decision-making role and delegate this role to others appointed by 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 Recipients of this Code to carry out acts and behave in a way that is detrimental to competition, including corruption between private individuals.

2.7 Protection of the person, dignity, diversity and equal opportunities

FLEXTECH recognizes the centrality of people and protects the physical, moral and psychological integrity of all those who work in the organization.

The Company prohibits any form of discrimination, harassment, violence, intimidation, mobbing, abuse or behavior detrimental to personal dignity.

Decisions regarding selection, recruitment, training, remuneration, assignment of responsibilities, professional progression and termination of employment relationships are taken on the basis of professional, objective and non-discriminatory criteria.

FLEXTECH promotes equal opportunities and equal treatment and pay for equal tasks, responsibilities and relevant conditions, in compliance with applicable legislation and collective bargaining.

Discrimination based on, inter alia, sex, gender, age, disability, ethnic or national origin, religion, belief, sexual orientation, marital status, personal status, political opinions, or trade union membership is prohibited.

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

FLEXTECH considers the protection of the health and safety of workers a fundamental value and operates in compliance with Legislative Decree 81/2008 and applicable legislation.

The Company pursues the continuous improvement of health and safety conditions through the identification and assessment of risks, the adoption of the necessary technical, organisational and procedural measures, the maintenance of plants and equipment, the training and awareness of workers and the monitoring of the effectiveness of the measures adopted.

No production, economic or commercial need can justify conduct contrary to the rules and procedures put in place to protect health and safety.

Each Recipient is required to comply with safety procedures and to promptly report dangerous situations, accidents, near misses and potentially harmful conditions.

Human resources are recognized as a fundamental and indispensable factor for corporate development. FLEXTECH protects 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. Personnel are hired 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 relating to the employment relationship. The recognition of wage increases or reward and incentive systems and access to higher positions or roles (promotions) are linked not only to the laws and collective labor agreements, but also to the individual merits of employees. FLEXTECH undertakes not to encourage forms of clientelism 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 all activities capable of preventing risks to the environment and occupational safety and health, in strict compliance with current regulations. In this sense, FLEXTECH is committed to preparing and maintaining safe and healthy work environments in compliance with current accident prevention regulations and to disseminate and consolidate a culture of safety and health at work by developing awareness of risks, promoting responsible behavior by all collaborators. To this end, it carries out technical and organizational interventions, through the introduction of:

- a system for managing risks, safety and resources to be protected;
- control and updating of the system to monitor 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 continuous improvement of 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 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 tasks and level among employees of different genders. Also to this end, two company contact figures have been specifically identified for female company employees, in order to facilitate the emergence of situations of hardship or environmental difficulty between genders.

2.9 Use and protection of the 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 and have the duty to promptly inform the relevant structures of any threats or events harmful to the Company itself or its assets. In particular, it is required to:

- avoid improper use that may cause undue costs, damage or reduction of 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 plants;
- always operate in compliance with the safety regulations provided for by law and internal procedures, in order to prevent possible damage to property, people or the environment;
- use the Company's property, 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 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 assets 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 functions in charge in a timely manner in the event of abnormal situations.

2.10 Corporate ESG policies and guiding principles

FLEXTECH pursues the progressive improvement of its sustainability performance and ensures that any ESG information communicated externally is correct, verifiable, consistent and supported by adequate documentation.

In the ESG field, FLEXTECH takes into account adopting 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 in the company's own financial activities.

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

- Environmental Risks
- Social risks
- Governance risks
- may involve economic and financial risks
- globalization and political risks (such as the war in Ukraine).

FLEXETCH, therefore, has reviewed the relationship with the available resources, whatever the type of product or outlet market in which it is involved, going on to evaluate 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 at all stages of the business processes and the supply chain, taking appropriate measures and taking into account the severity and likelihood 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 negative effects on human rights and the environment;
- prevent or mitigate potential effects;
- to put an end to or minimise the actual effects; to establish and maintain a complaints procedure;
- monitor the effectiveness of due diligence policies and measures;
- publicly account for the duty of care.

2.11 Environmental protection and circular economy

FLEXTECH considers environmental protection an integral part of its industrial responsibility and pursues the continuous improvement of its environmental performance.
The Company operates in compliance with applicable regulations on emissions, discharges, waste, chemicals, resource use, energy and pollution prevention.
FLEXTECH promotes, compatibly with the technical, quality and safety requirements of the products:

- the efficient use of raw materials;
- the prevention and reduction of waste;
- the recovery and recycling of materials;

- energy efficiency;
- the reduction of the environmental impacts of processes;
- the design of products according to circular economy principles;
- the progressive reduction of the environmental footprint of its activities.

2.12 Responsible handling of chemicals and raw materials

FLEXTECH manages raw materials, substances and mixtures in compliance with the applicable legislation and, in particular, with Regulation (EC) No. 1907/2006 (REACH), Regulation (EC) No. 1272/2008 (CLP) and other European, national and international regulations applicable to the substances used in its products and processes.

FLEXTECH adopts controls proportionate to its responsibilities in the supply chain in order to identify and manage substances that are prohibited, subject to restrictions or specific information obligations.

Suppliers are required to provide correct and up-to-date information on the composition, classification, safety and regulatory compliance of the substances and materials supplied.

2.13 Sustainable product design

FLEXTECH takes into account, in the development of its products and processes, the principles of circular economy, resource efficiency, recyclability and reduction of environmental impacts along the life cycle.

The Company monitors the evolution and, according to the relevant scope of application and the expected timelines, ensures compliance with the obligations arising from Regulation (EU) 2024/1781 – Ecodesign for Sustainable Products Regulation (ESPR) and the related implementing acts, including any information and traceability requirements applicable to its products.

This formulation correctly avoids stating that today every Flextech film is already subject to specific ESPR requirements.

2.14 Environmental Communications and Claims

FLEXTECH ensures that information relating to the environmental characteristics of its products, processes and activities is truthful, clear, verifiable and supported by adequate evidence.

It is forbidden to use environmental statements, certifications, symbols, labels, data or representations that may be false, misleading or inadequately documented.

Claims relating to, among other things, recyclability, recycled content, emission reduction, carbon footprint, resource savings and other environmental performance must be supported by appropriate information, evidence and methodologies with respect to the nature of the claim made.

Declarations relating to the recyclability, reusability, compostability, recycled material content or other environmental characteristics of packaging must be made in compliance with Regulation (EU) 2025/40 and other applicable provisions and must be supported by adequate technical and documentary evidence.

2.15 International Trade Compliance

FLEXTECH conducts its international business activities in compliance with applicable regulations on customs, export control, trade restrictions, embargoes and economic and financial sanctions.

The Company adopts controls proportionate to the risk with respect to the trading counterparties, the countries involved, the nature and destination of the products and, where necessary, the user and the end use.

It is forbidden to carry out, directly or indirectly, operations aimed at circumventing applicable prohibitions, restrictions, economic sanctions, export controls or customs obligations.

Anomalous situations, triangulation requests without economic justification, inconsistent allocations or other circumstances that may indicate attempts at circumvention must be promptly reported to the competent functions

2.16 Administrative, accounting, tax and customs correctness

FLEXTECH ensures that business operations are properly authorized, documented, recorded, and auditable.

The accounting records and corporate communications must correctly and truthfully represent the economic, equity and financial situation of the Company.

FLEXTECH manages tax and customs obligations according to the principles of legality, fairness, transparency, traceability and collaboration with the competent authorities.

It is forbidden to use invoices or other documents relating to non-existent transactions, to conceal elements relevant for tax or customs purposes, to carry out simulated transactions or to adopt artifices aimed at evading taxes, duties or other legal obligations.

2.17 Packaging and packaging waste – PPWR

FLEXTECH recognizes the prevention and reduction of the environmental impact of packaging and packaging waste as a component of its environmental and industrial responsibility.

The Company operates, to the extent applicable to its business and to the roles assumed from time to time in the supply chain, in compliance with Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR), amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repealing Directive 94/62/EC, as well as the related implementing provisions and the European Commission Guidelines on the application of Regulation (EU) 2025/40.

FLEXTECH promotes the design, production, procurement and use of packaging according to the principles of waste prevention, reduction of materials used, recyclability, circularity, efficient use of resources and, where required by applicable legislation, use of recycled materials.

In particular, according to the role played by the Company and the obligations applicable to the different types of packaging, FLEXTECH undertakes to:

- verify the compliance of packaging with the applicable requirements on composition, substances, recyclability and environmental performance;
- pursue the reduction of the weight and volume of packaging within the limits compatible with the functionality, safety, protection and quality of the products;
- to promote, where technically and economically possible and in compliance with product requirements, packaging solutions that are recyclable, reusable or characterized by a lower environmental impact;
- ensure compliance with any requirements relating to the minimum content of recycled material, where applicable;
- ensure the correct management of information, documentation, marking and labelling of packaging according to the timing and methods provided for by the legislation;
- ensure, where applicable, adequate traceability and storage of the documentation required to demonstrate the compliance of packaging;
- collaborate with suppliers and customers in order to acquire and communicate the information necessary to comply with the obligations provided for by the legislation;
- comply with applicable obligations on extended producer responsibility, packaging waste management, collection, recovery and recycling.

You may not provide false, incomplete or misleading information regarding the composition, recyclability, recycled content, reusability, environmental performance or regulatory compliance of packaging.

3. ANTI-MONEY LAUNDERING

3.1 Commitment to combating money laundering and illicit financing

FLEXTECH undertakes to comply with all national and international anti-money laundering regulations and provisions. 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 events relating to the laundering of money deriving from illegal or criminal activities. Before establishing relationships or entering into contracts with non-occasional suppliers and other partners in long-term business relationships, FLEXTECH must ensure the moral integrity, reputation and good name of the commercial counterpart.

4 CYBERSECURITY

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

The Recipients in the activities carried out on behalf of FLEXTECH 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 endowed with suitable 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 means suitable for accessing an IT 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 subjects, in the activities carried out on behalf of FLEXTECH), the information, data or programs contained therein or from favoring 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 suitable for intercepting, preventing or interrupting communications relating to an IT 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 in the measures and within the limits established by the relevant holders. 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 useless in whole or in part (or seriously hindering its operation) the FLEXTECH computer system, other people's computer systems or computer systems of public utility.

4.2 Cybersecurity and digital resilience

FLEXTECH considers the cybersecurity of information systems, production plants, digital infrastructures and data to be an integral part of its risk management system.
Recipients must comply with company procedures relating to credential management, access control, IT devices, software, data protection, backup, and network and system security.
You may not install or use unauthorized computer software, applications, or services when they may compromise the security of your company's systems or information.

Any incident, suspicious access, data loss, phishing attempt, credential compromise, or other significant anomaly should be reported immediately.

4.3 Responsible use of Artificial Intelligence

FLEXTECH promotes a responsible, safe, transparent and legally compliant use of Artificial Intelligence systems, in compliance with Regulation (EU) 2024/1689 – Artificial Intelligence Act and applicable legislation.
Artificial Intelligence systems must be used only for authorized business purposes, in compliance with the principles of human supervision, security, confidentiality, protection of personal data, protection of intellectual property and reliability of information.
It is forbidden to enter personal data, confidential information, trade secrets, know-how, technical documentation or other protected company information into unauthorized Artificial Intelligence systems.
Outputs produced by Artificial Intelligence systems must be subjected to adequate human verification before being used when they can produce significant technical, economic, legal, commercial, production or organizational effects.
FLEXTECH promotes an adequate level of Artificial Intelligence literacy of people using such systems on behalf of the Company, in line with Article 4 of Regulation (EU) 2024/1689.

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 performance or on the occasion of the activity provided in his or her favour. In compliance with current legislation and Regulation (EU) 2016/679 (GDPR), Legislative Decree 196/2003, as amended, and further applicable legislation on the protection of personal data, all information, knowledge and data acquired or processed by the Recipients through their activities may not be used, communicated or disclosed without the express authorisation of the company owner. Each Recipient shall:

- acquire and process only the information and data necessary and directly related to its activity;
- store such data and information in such a way as to prevent third parties from becoming aware of it;
- communicate and disclose the data/information within the framework of the procedures set by the owner company and subject to the authorization of the owner company, through the person delegated to it;
- evaluate and determine the confidential and confidential nature of the information in accordance with the provisions of the procedures established by the data controller;
- observe 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.

5.2 Data processing activities

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 not recorded in a database – subject to protection by current legislation on privacy. FLEXTECH is particularly attentive to aspects concerning the privacy of staff/collaborators/customers/users and any other person interested in the processing of their personal data by the company itself. Specific security measures are observed to prevent the loss, unlawful or incorrect use of the data subject to processing by FLEXTECH

and/or unauthorized access to the company's website. The processing of personal data is allowed 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 as part of 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 and protection of the whistleblower

FLEXTECH has established, in accordance with Legislative Decree 24/2023 and applicable legislation, special internal channels for reporting violations falling within its scope of application.
Reports are handled in compliance with the principles of confidentiality, security and protection of personal data.
FLEXTECH guarantees the confidentiality of the identity of the whistleblower, the persons involved and the information contained in the report within the limits and in the manner provided for by applicable legislation.
Any form of retaliation against persons who make reports benefiting from the protections provided for by law is prohibited.
The knowingly abusive or instrumental use of the reporting channels remains subject to the consequences provided for by the applicable legislation and disciplinary system.

6.2 Non-tolerance of non-compliant behaviour

Any conduct contrary to the spirit of the code must be reported to the relevant bodies, to the Supervisory Body, if appointed, using the methods provided for by the Model, if established and adopted. Whistleblowers will be guaranteed 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 persons wrongly accused and/or in bad faith.
Reports received on the IT channel specially prepared in accordance with the provisions of Legislative Decree 24/2023 will be managed by the company team specifically dedicated to it 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 governing 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 CCNL adopted, sanctions proportionate to the seriousness of the violations committed. In particular, violations of the provisions and principles established in the Code of Ethics may give rise to the application of sanctions and/or additional measures, including precautionary measures, expressly indicated in the Organizational Model pursuant to Legislative Decree 231 of 8 June 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 noted 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 possible only 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 Ethical training

FLEXTECH, in agreement with the Supervisory Body if established, 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 requirements 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 company 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, addressed to the Recipients.

8.3 Updating the Code of Ethics

This Code of Ethics is subject to periodic review in order to keep its contents consistent with the regulatory, organisational and operational evolution of the Company.
Any legislative or regulatory changes applicable to the Company must be considered effective and prevail over the provisions of this Code that may have become incompatible, without prejudice to the need to proceed with the relevant formal update.

The Company ensures adequate communication of significant changes to the Recipients.

Villanova Mondovì, 4th September 2026

FLEXETCH SRL
The Chief Executive Officer

