

The Flexitallic Group Ethics Policy

Our Commitment

We are committed to uncompromising Integrity in all that we do and in the way in which we relate to each other and to people outside the Company, as reflected in Our Guiding Principles. We must constantly strive to avoid any circumstances which may create a conflict, or the appearance of a conflict, between our personal interests and those of the Company.

Our Guiding Principles

- Our Ethics Policy applies equally to all employees, officers and directors
- We obey the laws, rules and regulations of all countries where we conduct business
- We do not tolerate, and we actively oppose, corruption in our businesses
- We comply with all laws on a global basis
- We ensure our books and records are accurate, complete and maintained according to the recognized accounting principles, industry best practices and all applicable laws
- We use assets of the Company, such as email, Internet access, telephones and computers responsibly and honorably
- We act in the best interests of the Company, and we spend its money solely for the business purposes of the Company
- We are committed to providing safe, quality products and services. We address and do not hide risks or mistakes
- We protect the privacy of all individuals
- We communicate accurately with our customers, our vendors and the public
- We are inclusive, value diversity and support our global team members in realizing their potential
- We respect freedom of association and obey all laws on working hours and compensation
- We safeguard the health and safety of our global team members
- We believe in vigorous competition and do not use illegal or unethical means to gain an advantage over a competitor
- We protect the confidential information of The Flexitallic Group and its group companies and respect the confidential information of our customers and competitors
- We comply with all applicable environmental laws and regulations.

- We endeavor to minimize any detrimental impact on the environment through waste reduction and efficiency improvement.

Reporting Concerns, Asking Questions

We are all responsible for protecting our culture of Integrity. A potential violation is a serious matter. If you see something or are unsure if something potentially violates our Ethics Policy or any of Our Guiding Principles, speak up!

We expect everyone to let us know about any suspected violation of our Ethics Policy. ¹

We do not tolerate retaliation against anyone for raising good faith concerns.

How do I make a report or raise a concern about potential violations of the Ethics Policy?

If you have a question about our Ethics Policy or you are concerned about a potential violation of our Ethics Policy, you have a number of options:

1. Discuss the issue with your supervisor
2. Discuss the issue with another supervisor or manager
3. Contact your Human Resources Department or the Global Legal Counsel ²

You may contact the Human Resources Department or the Global Legal Counsel to report concerns or ask questions confidentially.

No Retaliation Policy

The Flexitallic Group and its group companies do not tolerate retaliation for asking questions or raising good-faith concerns of possible violations of the Ethics Policy.

Violations of the Ethics Policy

Your concerns are taken very seriously. We will investigate reports of possible violations of the Ethics Policy. All employees are expected to fully cooperate with investigations conducted by the Company. Violations of the Ethics Policy are subject to disciplinary action up to and including termination.

¹ If you have concerns about the conduct or practices of any suppliers, customers or other third-parties, please refer to The Flexitallic Group Anti-Corruption Policy.

² The contact information for the Global Legal Counsel is:

Howard R. King
Phone: (281) 604-2586
Mobile: (832) 544-0737
Email: hking@flexitallic.com

To make an ethical decision, ask yourself these questions:

- Is it legal?
- Does it follow the policies and procedures of The Flexitallic Group and its group companies?
- Is the action or decision consistent with the letter and spirit of the Ethics Policy? (When in doubt, ask – talk to your manager or supervisor, or the Global Legal Counsel.)
- What would others think of my decision or action? (How would it make me feel if my action or decision were known to my family? My friends? My co-workers? How would I explain it to those affected by my action or decision?)
- How would I feel if my actions appeared in the news media, on television or on the Internet?

Adherence to this Ethics Policy is a condition of employment with The Flexitallic Group and each of its group companies. However, this requirement of behavior does not create an employment contract or an offer of employment.

This Ethics Policy is not all-encompassing. Bring questions about situations not discussed here to your supervisor, another supervisor or manager, the Global Legal Counsel, or the Human Resources Department.

Waiver: Any waiver of this Ethics Policy for anyone covered by the Policy who is not an executive officer or director of The Flexitallic Group may be made only by the Chief Executive Officer of The Flexitallic Group in writing. Any waiver of this Ethics Policy for an executive officer or director of The Flexitallic Group shall be made in writing by the Board of Directors of The Flexitallic Group.

The Flexitallic Group retains the right to modify this policy or any of its sections at any time, to make it more adaptable to the evolving needs of The Flexitallic Group, any of its group companies, their respective employees and customers or applicable laws.

Any alleged violation of this Ethics Policy by any executive officer of The Flexitallic Group or any of its group companies should be reported to the Board of Directors of The Flexitallic Group, the CEO of The Flexitallic Group or the Global Legal Counsel.