

Groupe Flexitech's Code of conduct

All our decisions and actions are based upon the general concepts expressed in the International Labour Organization (ILO) conventions, the OECD Guidelines for Multinational Enterprises and the Universal Declaration of Human Rights. These rules and principles must be respected by everyone in the organization, regardless of position, and they are valid in all regions and at all times.

Any Director or employee who is found to have violated our Code of Conduct will be subject to disciplinary action.

In 2019 Flexitech received the gold medal of Ecovadis for the efficiency of its actions in its Corporate Social Responsibility policy. It is a major recognition which encourage us to continue to apply this behavior and mindset and be successful within our business environment.



Introduction from CEO

“At Flexitech, we want to lead the transformation of the automotive industry towards a more sustainable world with best-in-class hose solutions.

We act with the highest level of integrity and respect for people and we care for our planet.

Wherever we operate, in all our decisions and interactions, we respect those core values. They are part of our day-to-day work and together, regardless our position, we share the responsibility of promoting and strengthening them.

We always do what is right, and we do it the right way

This code of conduct will give you the framework of our principles and answers for our operations. I encourage you to carefully read this code and to refer back to it frequently. I also ask you to report any violation to our principles and provide your feedback on how to better apply those in our business.”

Thank you,

Frédéric Sabalski, 1st of January 2023





Our Three Principles



Act responsibly



BUSINESS IMPARTIALITY AND INTEGRITY

- ✓ FAIR COMPETITION
- ✓ TRADE COMPLIANCE
- ✓ NO CONFLICT OF INTERESTS
- ✓ ANTI BRIBERY & ANTI CORRUPTION
- ✓ ANTI MONEY LAUNDERING
- ✓ CONFORMITY OF OUR PRODUCTS



RESPECT OF HUMAN RIGHTS

- ✓ NO DISCRIMINATION & HARASSMENT
- ✓ NO FORCED OR COMPULSORY LABOUR
- ✓ NO CHILD WORK
- ✓ HEALTH AND SAFETY IN OUR WORKPLACE
- ✓ RESPECT OF PERSONAL DATA AND PRIVACY



PROTECT THE PLANET

- ✓ ENVIRONMENTAL PROTECTION
- ✓ REDUCE RESOURCES AND ENERGIES
- ✓ DISCHARGE AND WASTE

Act responsibly

What is expected of Everyone

Each employee and each supplier of Flexitech must comply with the Code of Conduct and the Laws in each country and region of the world.

We expect that our staff will use good and ethical judgment for each of their decisions.

We ask everyone to question himself/herself before taking any decision :

- ***My decision/action, is it consistent with our Code of conduct ?***
- ***My decision/action, is it ethical ?***
- ***My decision/action, is it legal ?***
- ***My decision/action, will it have a negative impact or consequences on the reputation of our company ?***

If you reach a negative answer to any of these questions, just don't do it.

If you are still uncertain, ask for guidance. The present Code tries to describe many of the situations that employees can face, but cannot address all circumstances. Don't hesitate to ask the support of :

- ❖ Your Management
- ❖ Local HR department

Please note that any violation of these guiding principles should be escalated to the management. This can be accomplished by contacting compliance@flexitech.com



Act responsibly

1 - Business Impartiality and Integrity



FAIR COMPETITION



**TRADE
COMPLIANCE**



**CONFLICT OF
INTERESTS**



ANTI CORRUPTION



**MONEY
LAUNDERING**



**CONFORMITY OF
OUR PRODUCTS**

Act responsibly

FAIR COMPETITION



DEFINITION :

Fair competition means to abide by all aspects of local, national and international laws. Corruption, bribes or any others illegal inducements are strictly prohibited.



EXPECTATIONS :

Each employee of Flexitech must respect all local, national and international competition/anti-trust law wherever we seek to do business.

Which means it is strictly prohibited to arrange agreements or understandings with competitors regarding prices (fix, raise, stabilize or lower prices to reduce or eliminate competition). All the discussions on these topics cannot occur and are illegal. Fair competition laws are intended to promote fair competition. We consider compliance with these laws of vital importance.



TOOLS AND ACTIONS :

Each employee who may have a contact with competitors must refer and respect the competition law policy which gives all the detail on the behavior expected and the “Do” and “don’t” for this specific item. Last but not least, each employee can send an email to compliance@flexitech.com to raise any kind of abuse in the organization.

Act responsibly

TRADE COMPLIANCE



DEFINITION :

Trade compliance is the process by which companies accept to comply with all laws and regulations of the countries with which they are doing business.



EXPECTATIONS :

All the employees of Flexitech must comply with applicable trade compliance requirements at any time, such as sales to countries affected by sanctions/embargoes or other import and export laws and regulations.

Indeed, we are involved in business in many parts of the world and we respect and follow applicable sanctions and rules related to cross-border trade.



TOOLS AND ACTIONS

Each employee can send an email to compliance@flexitech.com to raise any kind of abuse in the organization.

Act responsibly

CONFLICT OF INTERESTS



DEFINITION :

A conflict of Interest happens when the personal interest of one of our employees compete with the interest of the Group Flexitech. In such a situation the decision of the individual is partial and the Interest of Flexitech is not defended.



EXPECTATIONS :

Each employee of Flexitech must act for the collective Interest of the Group Flexitech. Therefore, all the decisions taken inside the professional area must be based on the interest of the Group Flexitech.

If an employee of the Group Flexitech find themselves in a situation that may involve or lead to a Conflict of Interest, the employee must report it to his/her direct manager to solve this particular situation in a fair and transparent manner.



TOOLS AND ACTIONS :

Each year our staff who has regular contact outside the company for professional reasons are supposed to fill in a document with the list of their contact and association and date of events. This transparency is mandatory at Flexitech (rf competition law policy).

Act responsibly

ANTI BRIBERY AND ANTI CORRUPTION



DEFINITION :

Corruption is defined as the abuse of someone's entrusted power often for private gain. This definition also includes the situation where someone is abusing its entrusted power for group benefit or advantage.

Bribery means offering, giving or promising (or authorizing someone to offer, give, or promise) an improper benefit, directly or indirectly, with the intention of influencing or rewarding the behavior of someone to obtain or retain a commercial advantage.



EXPECTATIONS :

Fair and transparent marketplace is fundamental. That's why we have no tolerance for the offering, solicitation or acceptance of any form of bribes or other corrupt behavior.

Corruption may involve major risks of penalties for companies and their employees (prison sentences, heavy fines, professional disqualification...), as well as reputational risks.

At Flexitech, every employee agrees not to accept any gift, entertainment or personal favor of an amount that is unreasonable with regards to customs and anticorruption laws, which are liable to influence their decisions.



TOOLS AND ACTIONS :

Each employee can send an email to compliance@flexitech.com to raise any kind of abuse in the organization.

Act responsibly

ANTI MONEY LAUNDERING



DEFINITION :

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin.



EXPECTATIONS :

All Flexitech employees must be cautious regarding payments with partners who show suspicious behaviors in their operations. If anything about a proposed transaction does not feel appropriate or could violate applicable laws, regulations or Flexitech's policies and procedures, it is necessary to escalate the questions with the management, Finance Department or HR department.



TOOLS AND ACTIONS :

Each employee can send an email to compliance@flexitech.com to raise any kind of abuse in the organization.

Act responsibly

CONFORMITY OF OUR PRODUCTS



DEFINITION :

Flexitech develops and delivers safety products which requires a lot of attention. Product conformity means to meet all agreements upon specifications defined with the client as well as all applicable regulatory obligations.



EXPECTATIONS :

Each employee of Flexitech must respect the process defined to develop and assemble our products. We cannot change the process without any approval of the hierarchy. Each employee must inform his/her manager when a dysfunction is identified.

All our technicians and managers in product, process, method, engineering, quality, logistic, sales and production must have Knowledge in product characteristic and risk evaluation (FMEA, VDA6.3 process audit, new product development,...). Last but not least, our client's requirements and regulations for the product must be known by our staff.



TOOLS AND ACTIONS :

Training plan and training actions are implemented each year to ensure the quality and conformity of our products. In addition, each plant has nominated a "safety product representative".

Act responsibly

2 – Respect of Human Rights



Act responsibly

NO DISCRIMINATION & HARASSMENT



DEFINITION :

The discrimination can be defined as an unfair or prejudicial treatment of different categories of people, especially on the grounds of race, age, sex, union belonging ect...

Harassment can be defined as a course of conduct which annoys, threatens, intimidates, alarms, or puts a person in fear of their safety. Harassment is unwanted, unwelcomed and uninvited behavior that demeans, threatens or offends the victim and results in a hostile environment for the victim. It can be sexual or moral.



EXPECTATIONS :

Our employees shall :

- ❖ Neither engage in nor tolerate any discrimination or harassment, including sexual harassment;
- ❖ Respect equal opportunities in terms of recruitment, compensation, access to training, promotion, termination or retirement; and
- ❖ Not engage in, support or tolerate discrimination on the basis of criteria such as gender, age, religion, marital status, race, caste, social background, diseases, disability, pregnancy, ethnic and national origin, political affiliation or sexual orientation.

Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the local HR Department.



TOOLS AND ACTIONS :

Flexitech has regular screening on wages and training to ensure equal treatment between gender. Our HR process and all HR activities reflect this principle.

Act responsibly

FORCED OR COMPULSORY LABOUR



DEFINITION :

The forced or compulsory labour is defined as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."



EXPECTATIONS :

Forced labor or compulsory labour in all its forms is strictly prohibited in activities managed directly or indirectly by FLEXITECH. The supplier is expected to respect this principle.

For example, the supplier's employees must be free to leave work or terminate their employment with reasonable notice.

Act responsibly

CHILD WORK



DEFINITION :

The International Labour Organization requires States to specify in law a minimum age for admission to employment not less than the age of finishing compulsory education, and which in any case, should not be less than 15 years.



EXPECTATIONS :

Child labor contradicts the values advocated and promoted by FLEXITECH.

It is strictly prohibited in activities directly covered by FLEXITECH through its companies or indirectly by its suppliers.

Our Suppliers shall:

- ❖ Not recruit or make use of child labour or exploit children in any way;
- ❖ Comply with all applicable minimum age regulations for employment

Act responsibly

HEALTH AND SAFETY IN OUR WORKPLACE



DEFINITION :

Our commitment in Safety is zero injuries and accidents.
Our commitment in Health is zero occupational illness.



EXPECTATIONS :

Group Flexitech is committed to the health and safety of its employees. It is our belief that all injuries and occupational illnesses are preventable. We have a commitment to zero injuries in the workplace. As a minimum, our suppliers must comply with all applicable health and safety laws, regulations and standards. Appropriate communication and training on hazards, procedures and use of proper protective equipment is essential for the safety and health of all our Flexitech and Supplier employees.



TOOLS AND ACTIONS :

All employees are trained on basic safety and health procedures and actions. We provide all protective equipment to our employees to operate in a safety place. We systematically evaluate our health and safety performance through appropriate audits and report progress. Flexitech is certified OHSAS 18001 in European plants.

Act responsibly

PERSONAL DATA & PRIVACY



DEFINITION :

Personal Data means any information relating to an identified or identifiable natural person.

An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.



EXPECTATIONS :

Flexitech pays a lot of attention to laws and regulation concerning the privacy of personal datas especially the GDPR law in Europe. The protection of individual information is fundamental. Flexitech does not communicate any personal information to third parties, except if necessary and permitted by applicable laws or regulations. At Flexitech, just few persons can have acces to personal datas because of their role and responsibility.



TOOLS AND ACTIONS :

A GDPR data base exisits at Flexitech for European plants. The list of all personal datas is registerded and how these data are processed at Flexitech.

Act responsibly

3 – Protect the planet



**ENVIRONMENTAL
PROTECTION**



**REDUCE RESOURCES &
ENERGIES**



DISCHARGE AND WASTE

Act responsibly

ENVIRONMENTAL PROTECTION



DEFINITION :

Protective actions that aims to reduce the adverse effects of our company's processes on the environment.



EXPECTATIONS :

Flexitech takes care of the environment. We try to use technologies and solutions that significantly reduce emissions and greenhouse gases. What's more, Flexitech designs its manufacturing, installation and service processes for minimum consumption of energy, eliminates hazardous products and favours materials that can be recycled. At all manufacturing sites and offices, and at our customers's premises, the environmental impact is part of major decisions and is managed in line with the rules set out in the Environment, Health and Safety (EHS) policy.



TOOLS AND ACTIONS :

Respect of all current, applicable environmental rules, regulations and laws in the countries where Flexitech has a presence.

All Flexitech Facilities must be certified according ISO 14001.

Eliminate the use of substances that are dangerous to the environment or health.

The respect of REACH European regulation ensures our products, packaging and operations are safe for our employees, consumers and the environment.

Act responsibly

REDUCE RESOURCES AND ENERGIES



DEFINITION :

Natural resources are the various mineral or biological resources necessary for human life and its economic activities, divided into two groups: renewable and non-renewable resources.



EXPECTATIONS :

Anxious to act on the environmental impact since the design of the products, Flexitech continually improves the performance of its products, taking into account their entire life cycle.

Energy is essential to the smooth running of Flexitech's economic and industrial activity, so energy efficiency, energy dependence, energy security and energy prices are major concerns.

For each plant, Flexitech controls water consumption, energy consumption and waste production.



TOOLS AND ACTIONS :

Controlling emissions from the facilities and buying locally.

Product Cycle life analysis and Continually optimized our product life cycle.

Implementation of recycling product when it's possible.

Work with suppliers who respect environment rules.

Support the sustainable use of resources and actively encourage reuse, recycling and composting.

Act responsibly

DISCHARGE AND WASTE



DEFINITION :

Discharge : it's the management of effluents generated by the activities of our facilities.

Waste : all material and products made by our industry that are not part of the final products sellable to the customer.



EXPECTATIONS :

Although Flexitech's industrial wastewater does not contain pollutants, each site is required to manage its effluents which must be separated and analyzed prior to proper disposal. As part of their environmental management system, sites are equipped to prevent accidental spills into the natural environment: the loading/unloading of tankers can cause numerous accidents with serious consequences for the environment.

The main challenges in respect of waste are first to optimize the manufacturing process in order to limit its production, and second to recycle everything that can be reused in the manufacturing process, without compromising on quality or customer requirements as regards the end product.



TOOLS AND ACTIONS :

Record and report to the top management all environmental accident.

Specific disposal in all facilities and specific training of people in case of environmental accident.

Reduce waste with annual targets and improvement on production processes.

