

Code of Conduct

Our reputation is critical to our long-term business success. That's why unwavering integrity, as well as ethical and lawful conduct, are non-negotiable across our entire organization.

flextos has built a strong reputation in the industry by producing high-quality products and conducting sustainable business. Although we operate under several independent brands and across various locations and countries around the world, we are united by a shared commitment to ethics and integrity that has guided us since our founding.

As a globally operating company, flextos is subject to a wide range of national and international laws and standards. To meet these requirements and ensure future success, our commitment to business integrity must be as strong as our products. This means conducting our business ethically, in accordance with our shared values, and in full compliance with all applicable laws and regulations. Ethics and compliance are therefore essential to our company.

Ethics and compliance are not abstract concepts. They comprise a concrete set of requirements that apply to all employees and to all other individuals working on behalf of our company, regardless of role, business unit, type or duration of work, or the country in which we operate. Only by consistently adhering to these requirements can we avoid major legal and economic risks for our company and ourselves. In doing so, we protect the legitimate interests of our customers, suppliers, and shareholders and uphold our responsibilities to society and the environment. Global integrity is the foundation of our sustainable success.

flextos does not pursue business opportunities that can only be realized by violating laws or company rules. No supervisor is authorized to instruct otherwise.

To build and maintain the necessary awareness and routine in dealing with ethical and compliance-related matters, flextos has implemented a continuous ethics and compliance program, of which this policy forms the framework.

Even isolated violations of legal provisions could seriously damage the hard-earned reputation we have built over many years. We call on every employee and anyone working on behalf of flextos to internalize the rules outlined in this policy, to apply them fully in their own area of responsibility, and to make use of the information available on these topics.

Global integrity is the foundation of our sustainable, continuous, and future success.

1. Compliance with Laws

flextos and all employees are bound by all applicable national and international laws. These include, for example, the payment of due taxes and fees, obtaining necessary regulatory approvals, respecting third-party property rights (including intellectual property), and observing all criminal law constraints, particularly those concerning money laundering and fraud.

Internal company regulations (such as workplace agreements or corporate policies) must also be strictly followed by all relevant employees.

2. Fair Competition and Antitrust Compliance

flextos is committed to fair competition. All employees are required to comply with the rules of fair competition within the legal frameworks of the countries in which we operate. flextos particularly adheres to applicable antitrust and competition laws, which prohibit agreements or conduct that unlawfully restrict trade or competition.

Regardless of the specific situation, coordinating bids, prices, terms, production plans, sales quotas, or market shares with competitors is strictly prohibited. This also includes informal discussions or arrangements. Sharing or disclosing commercially sensitive information concerning competitors, customers, or suppliers may likewise violate competition law. Even the appearance of unfair competition must be avoided.

3. Gifts and Hospitality (Especially Anti-Corruption)

To build and maintain strong business relationships, courtesies such as gifts and hospitality are often exchanged with customers, suppliers, and other partners.

Such exchanges must reflect standard business practices and must not influence—or appear to influence—business decisions. Proportionality and common sense must always guide our actions in these matters. Business courtesies may be restricted or prohibited under certain legal frameworks and in some countries. All applicable policies must be followed.

Gifts and hospitality include anything of value offered or received in connection with a business relationship for personal use and without adequate compensation. Examples include goods, promotional items (e.g., bags, pens, calendars, planners, caps), services, meals, travel, accommodations, event tickets (e.g., for concerts or sports events), or discounts.

The following specific rules apply:

- **Cash gifts or equivalents**, such as gift cards, are never allowed.
- For non-cash gifts (e.g., merchandise, promotional items), **local legal value limits** and commonly accepted ethical practices must be observed. In Germany, for instance, the flextos value limit is €25.
- Business meals or similar invitations (e.g., catering, hosting customers or suppliers) must be appropriate and justified by legitimate business interests.

Any attempt by business partners or third parties to unduly influence employee decisions (e.g., through excessive gifts or favors) must be reported to the appropriate supervisor.

4. Security, Data Protection, and Confidential Information

Protecting data, assets, employees, visitors, information systems, facilities, and communications networks from malicious acts—and from competitors—is of utmost importance to our success.

flextos' continued success relies heavily on the secure use and confidentiality of sensitive data and information, whether belonging to flextos or our partners.

Confidential information of any kind (e.g., trade secrets, inventions, designs, sketches, technical or commercial data) must not be disclosed to unauthorized parties, whether inside or outside the company. This obligation continues beyond the end of any employment relationship.

Such confidentiality must also be contractually ensured in dealings with external partners.

Furthermore, the processing of personal data is subject to strict legal requirements (e.g., the EU General Data Protection Regulation – GDPR). flextos strictly complies with all relevant data protection laws.

5. Product Quality and Safety

Our high product quality is a core pillar of our business. Customer satisfaction, process-oriented management, error prevention, continuous improvement, and comprehensive quality management are essential.

We must meet all customer requirements—especially those related to quality, reliability, delivery time, and pricing.

All employees are responsible for minimizing risks and hazards to health and safety associated with the use of our products.

All applicable technical and legal standards and regulations must be identified and followed.

6. Handling of Company Assets

The tangible and intangible assets of flextos (e.g., products, materials, components, office and business equipment, software, patents, trademarks, logos, know-how, etc.) are intended solely to support employees in achieving the company's business objectives.

Use of these assets is strictly limited to business purposes and not permitted for personal use.

7. Avoidance of Conflicts of Interest

Business conduct must always be aligned with the interests of the company, regardless of any personal interests.

Secondary employment—whether paid or unpaid—that could conflict with flextos' interests is only permissible with prior written approval in individual cases. Such approval will not be withheld without just cause.

Employees must avoid conflicts of interest wherever possible. If unavoidable, the employee must inform their supervisor to ensure a fair and transparent resolution.

8. Social and Ethical Responsibility

Our commitment to social and ethical responsibility is a cornerstone of the flextos corporate philosophy. flextos respects and protects the personal dignity of every employee and fosters a culture of fairness and mutual respect.

Any form of harassment or discrimination—verbal or physical—based on nationality, origin, religion, gender, age, sexual orientation, or similar grounds is strictly prohibited. No employee may be disadvantaged for exercising their personal rights.

This includes a clear prohibition of child labor, forced labor, discrimination, bullying, and physical punishment. It also includes adherence to workplace safety regulations, working time laws, fair wages aligned with industry standards, and the freedom of association and employee representation.

9. Export Control & Customs Compliance

As a global company, flextos must comply with regulations that restrict the international movement of goods. Various international and national laws, regulations, and embargoes limit or prohibit the trade, export, or import of technologies, goods, services, and capital flows.

Such restrictions may arise due to the nature of the goods, the country of origin, the end-use, or the identity of the business partner.

Applicable laws in the countries we operate in (e.g., German, U.S., Chinese laws) are further supplemented by internal company policies based on intended use.

10. Sustainability and Environmental Protection

Sustainability and environmental protection are central to flextos, particularly with a view toward improving the environmental compatibility and eco-efficiency of our products and their manufacturing processes. Preventive measures and the avoidance of environmental incidents and their causes are essential to our business operations.

All employees are responsible for using resources responsibly and actively contributing to environmental protection.

Key goals include preserving and protecting natural resources, responsibly managing raw materials, avoiding and minimizing waste and pollutants, recycling, transitioning to renewable energy, and preventing environmentally harmful incidents.

We also recognize our responsibility for sustainability and environmental protection when working with suppliers, business partners, and contractors.

In terms of employee safety, we are committed to maintaining the highest standards of health and safety in the workplace. We comply with all internal and external quality, safety, and regulatory requirements.

11. Violations of the Code of Conduct

Every flextos employee is personally responsible for compliance with our Code of Conduct. In case of doubt, employees may consult their supervisor and/or company management.

flextos offers employees the opportunity to confidentially report potential violations of this Code or material breaches of applicable laws through the flextos whistleblower system.

Non-compliance with this Code may result in disciplinary, civil, or even criminal consequences.

12. Information and Training

To strengthen awareness and ensure compliance with our Code of Conduct, flextos provides regular training to employees on relevant topics.

These trainings may be conducted in person or through e-learning platforms.