
Flexsys' Third Party Code of Conduct

Flexsys is committed to conducting all our business activities in accordance with the highest legal and ethical standards. This Third Party Code of Conduct sets forth basic principles for Third Party conduct when working with Flexsys. Flexsys strives to conduct business only with Third Parties who share our commitments to compliance with legal requirements and to high ethical standards. Flexsys expects Third Parties who produce products or provide services to Flexsys to conduct business responsibly – with integrity, honesty and transparency.

Flexsys' Code of Business Conduct is available at: <https://flexsys.com/resources/>

Flexsys developed this Third Party Code of Conduct to ensure that you are aware of Flexsys' expectations when working with our employees and for your own business conduct. Flexsys expects you to be able to demonstrate compliance with the expectations stated in this Third Party Code of Conduct and we may perform for-cause assessments.

We ask that you integrate, communicate, and apply the principles found in Flexsys' Third Party Code of Conduct.

Working With Our Employees

Flexsys' policy is to purchase products and services based on the total value to the company independent of a Third Party's decision to purchase from Flexsys. Factors that Flexsys considers in making purchasing decisions include competitive pricing, quality of services and materials, timely performance, sustainability, innovative ideas and a commitment to comply with this Third Party Code of Conduct.

Flexsys expects Third Parties to respect the following provisions when interacting with employees:

Conflicts of Interest

All Flexsys employees are required to be free from actual or potential conflicts of interest. A conflict of interest occurs whenever the prospect of direct or indirect personal gain may influence the business judgment or actions of a Flexsys employee when conducting Flexsys business.

Gifts and Entertainment

Flexsys recognizes the legitimate business purposes of creating goodwill and sound working relationships that can be fostered by occasional business-related entertainment or exchanges of gifts, subject to the following limitations:

- Entertainment, gifts, or other gratuities must have a legitimate business purpose and must not cause, or reasonably be perceived to cause, the recipient to alter normal business judgment concerning any transaction or impair the individual's loyalty to his/her employer.
- Entertainment must be legal, reasonable, and proportionate and consistent with acceptable business customs and practices. If a host is not present, entertainment is considered a gift and subject to the gift limitations.
- The giving and receiving of gifts greater than nominal value is generally not appropriate. Gifts of cash or cash equivalents (including gift cards, securities, individual discounts, and vouchers) are never acceptable.
- Gifts or entertainment should not be solicited by a Flexsys employee or must not be received on a frequent or recurring basis.

- Flexsys employees actively engaged in a procurement decision-making process are generally prohibited from receiving a gift or entertainment from a bidding party.
- Limitations applicable to Flexsys employees also apply to family members and agents of the employee.

Conduct of Third Parties

Flexsys is committed to creating value for all stakeholders by driving sustainable product innovation, managing resources responsibly, and supporting transformative projects and initiatives that positively impact people and the planet.

Third-party suppliers of goods and services to Flexsys ("Third Parties") are expected to comply with the laws, rules, and regulations of the countries in which they operate as a minimum standard.

Flexsys expects all Third Parties to comply with internationally recognized standards to advance social and environmental responsibility, including the following:

Ethics

Third Parties must conduct their business in an ethical manner, act with integrity, and maintain accurate and timely books and records.

- **Corruption, Bribery, Extortion, or Embezzlement:** Corruption, bribery, extortion, and embezzlement, in any form, are strictly prohibited. Third Parties must not pay or accept bribes or participate in other illegal inducements in business or government relationships.
- **Protection of Intellectual Property:** Third Parties must respect intellectual property rights, safeguard customer information, and ensure that transfer of technology and know-how is conducted in a manner that protects intellectual property rights.
- **Sanctioned Parties:** Third Parties may not use any supplier of services or equipment which (a) is located in any country subject to United Nations, U.S. or EU economic sanctions (or acting on behalf of persons or entities located in such countries) or (b) appears on lists of restricted or prohibited persons maintained by the United Nations, U.S., EU or the country of manufacture, origin/destination of the cargo. Third Parties shall screen all vessels, containers and other equipment and their owners to ensure compliance with this requirement.

Human Rights & Labor

Third Parties must uphold the human rights of workers and treat them with dignity and respect, including: (a) permitting freedom of association and recognizing the right to collective bargain, consistent with local laws; (b) eliminating discrimination in hiring, employment and compensation based on race, color, age, gender or gender identify, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, or marital status; (c) creating a workplace free of harassment or any other form of abuse, including sexual harassment or abuse; and (d) complying with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.

Prevention of Involuntary or Underage Labor

Third Parties shall not engage in human trafficking or slavery or use any form of child labor or other forced, bonded, indentured or prison labor.

Conflict Minerals

Third Parties of products containing conflict minerals must:

- Commit to identifying, reducing and ultimately eliminating the use of conflict minerals in materials supplied to Flexsys;
- Work with their own upstream vendors and supply chain to determine the source and chain of custody of any products containing conflict minerals supplied to Flexsys;
- Establish their own policies, due diligence frameworks and management systems for the traceability of conflict minerals consistent with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same; and
- Cooperate with Flexsys in its efforts to comply with any applicable reporting requirements of governmental agencies

Third Party Diversity

Third Parties are encouraged to support the businesses and communities where Flexsys operates by engaging with small businesses, minority- and woman-owned businesses and other diverse categories.

Environment, Health & Safety

Third Parties must be committed to providing safe working conditions in compliance with all applicable workplace health and safety laws, including: (a) providing a safe and healthy workplace for their employees; (b) providing appropriate worker protection(s) for chemical, biological, and physical hazard risks; (c) maintaining process safety programs to prevent or mitigate catastrophic events; (d) conducting risk assessments and implementing emergency preparedness plans and response procedures; and (e) providing safety and hazard information for worker education.

Third Parties must be committed to reducing their environmental impact by: (a) obtaining and complying with all required environmental permits, licenses, information registrations, and restrictions; (b) ensuring safe handling, movement, storage, recycling, reuse and management of waste, air emissions, and wastewater discharges; (c) preventing and mitigating accidental spills and releases to the environment; and (d) minimizing greenhouse gas emissions, energy and water use, and waste. Flexsys may favor Third Parties who seek ways to minimize the use of nonrenewable resources, use all resources more efficiently and minimize the environmental impact of their operations.

Third Parties must be committed to protecting communities during transporting and comply with all applicable transportation laws and have systems in place to ensure safe and secure transportation of materials. This includes consideration for selection of logistics service providers (including warehouse and terminals), selection and inspection of transport containers, loading and unloading of transport containers, securing and sealing of transport containers, and responding to emergencies.

Management Systems

Third Parties should implement management systems to facilitate continual improvement and to ensure compliance with the expectations found in this Third Party Code of Conduct.

Reporting & Compliance

Monitoring and Auditing

Third Parties shall maintain sufficient records and documentation to demonstrate compliance with all requirements in this Code. Monitoring, due diligence, audits (e.g., Ecovadis) and similar activities as needed to ensure compliance are the responsibility of the Third Party. Flexsys reserves the right to assess Third Parties' sustainability and responsible procurement performance, as well as audit or inspect Third Parties' records and facilities, as applicable and permitted by law, to confirm compliance with this Code. Third Parties who are not in compliance with this Code may be terminated and/or precluded from consideration of future business. Third Parties must promptly implement corrective actions.

Reporting Concerns

Flexsys encourages its Third Parties, vendors, contractors, agents, distributors, customers and other third parties to seek guidance regarding Flexsys' policies when needed and to raise concerns regarding activities that may involve illegal activity, violations of policy or unethical conduct, including violations of this Third Party Code of Conduct. No disciplinary action or retaliation will be taken against an individual bringing a concern to the Company's attention in good faith, even if the investigation determines that no violations could be found.

To facilitate this interaction, Flexsys offers a helpline operated by an independent third party. Reports are confidential and may be made anonymously when permitted by law. You can report your concern anonymously online or by telephone in multiple languages by going to flexsys.ethicspoint.com.