

Flexitallic Policy on Reporting Illegal or Unethical Conduct

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Introduction

The Flexitallic Group and each of its subsidiaries (“Flexitallic”) are committed to operating in an honest, ethical manner and preserving a culture of Integrity. This can only be accomplished through compliance with all applicable laws, regulations and corporate policies.

Flexitallic’s Ethics Policy and its Anti-Corruption Policy require directors, officers, employees and Third Party Resources to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Flexitallic, we must practice unconditional honesty and integrity in fulfilling our responsibilities. This includes an obligation to report misconduct, including potential or suspected misconduct, and to cooperate fully in investigations. Flexitallic has adopted this Policy to promote a climate of accountability and to encourage concerns to be reported before they can disrupt the business or operations of Flexitallic.

Flexitallic will not tolerate retaliation against any person who, acting in good faith, reports suspected misconduct, asks questions or raises concerns.

Scope and Compliance

This policy is applicable to all Flexitallic directors, officers, employees and Third Party Resources. As with all corporate policies, failure to comply with this policy may result in disciplinary action, including termination of employment.

Definitions

“Third Party Resources” are all persons or entities who are either doing business with or acting for or on behalf of Flexitallic anywhere in the world, including distributors, resellers, partners, sales representatives, suppliers, vendors, subcontractors, consultants, intermediaries, or agents.

“Reporter” is an individual who, acting in good faith, reports suspected misconduct, asks questions or raises concerns.

“Suspected Violation” is any conduct, activity or omission that could be a violation of a law, regulation, Flexitallic’s Ethics Policy, Flexitallic’s Anti-Corruption Policy, any other Flexitallic Corporate Policy or Flexitallic Guiding Principle, including but not limited to whistleblowing.

“Whistleblowing” is a report to a governmental authority by a Flexitallic employee regarding conduct of Flexitallic that involves a Suspected Violation. Such reports, made in good faith, are protected from retaliation or reprisal.

Policy Statement

Reporting Concerns, Asking Questions

We are all responsible for protecting our culture of Integrity. A Suspected Violation is a serious matter. If you see something or are unsure if something is a Suspected Violation, **speak up!**

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

How do I make a report or raise a concern about a Suspected Violation?

If you have a good faith question about whether a Suspected Violation may have occurred, 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 ¹
4. Contact the Global CEO:
Lane Walker
Office Phone: +(281) 604-2589
Email: lwalker@flexitallic.com
5. Contact the Chairman of the TFG Board of Directors: Ian Dugan
Office Phone: +44 20 7034 3593
Email: ian.dugan@bridgepoint.eu

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

Treatment and Investigation of Concerns

All reports will be taken seriously and will be addressed promptly and professionally by authorized personnel, which may include but is not limited to members of senior management, as well as the Legal and Human Resources departments (“Investigators”). Flexitallic directors, officers, employees and Third Party Resources are required to cooperate fully in investigations conducted by Investigators or authorized members of Flexitallic external legal and accounting firms. Confidentiality of the Reporter’s identity will be maintained to the extent possible. The specific action taken in any particular case depends on the nature and seriousness of the conduct or circumstances reported and the quality of information provided. Upon conclusion of the investigation, Investigators will recommend appropriate remedial or corrective action to management. The findings of investigations and any remedial or corrective actions taken as a result of such investigations are confidential. Records will be retained relating to each report, the actions taken to investigate and any remedial or corrective actions in accordance with Flexitallic’s policies regarding records retention and/or any applicable laws and regulations.

No Retaliation Policy

Flexitallic will not tolerate retaliation in any form for asking questions or raising good-faith concerns of any Suspected Violation, including, but not limited to whistleblowing. Any person who engages in such retaliation, directly or indirectly, or encourages others to do so, is subject to disciplinary action, including termination of employment.

¹ The contact information for the Global Legal Counsel is:

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