

Suppliers' Code of Ethics



ISSUER'S SIGNATURE	EXEC APPROVAL
Renata Brizzolara	Gianni Isetti




Message from the Legal Representative

Dear Associates,

REFLEXX S.p.A., in collaboration with the best manufacturing companies in the Far East, develops and produces Disposable and Reusable Gloves in Nitrile, Latex, Vinyl, and other innovative materials. It quickly and efficiently provides the market with gloves for professional use that offer maximum protection and performance with specific attention to consistent product quality, a fundamental value in manufacturing. REFLEXX gloves comply with several Medical, Occupational Safety, and Food regulations and guarantees high quality, strength, and product safety. However, REFLEXX also respects human rights throughout the production chain of its own-brand gloves and makes Corporate Social Responsibility a priority.

Company Executives consider the Management System to the primary foundation for staff engagement and developing its processes, basing its operating decisions on the concepts of:

Propriety, understood as respect for its Customer's expectations and the commitments that were made.

Trustworthiness, understood as:

- reliability of the service delivered
- safety of the products supplied
- respect for the environment

Compliance, understood as respect in implementing the company's activities in all its processes along with contractual and legal requirements.

Safety

- to fulfil its obligations to provide safe and legal products, ensuring that installed products comply with and meet the Customer's requirements and comply with industry regulations

Ethics, through:

- No use of child labour
- Promoting staff growth, understood as developing skills and awareness of their role in the organisation, and fostering a sense of responsibility towards the safety of the products supplied and the service provided
- Comprehensive information on all applicable regulations in the industry.

This Code reflects the company's strict Ethics. It applies to our daily work practices, informs our day today activity, answers queries that we may have to face, and guides us in our work..

We must commit to compliance from all individuals and companies collaborating with us, including Suppliers who operate at a distance.

It is relevant to individuals who are ambassadors and custodians of our Principles, Ethical Values, and Future.

Please read this Code carefully and consult it frequently. Our future success is built upon sharing this Code and its Principles among all of us.

Do not hesitate to ask questions or request advice whenever you need to.

Gianni Isetti

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0. OBJECTIVES AND GOALS

REFLEXX S.p.A.'s goal is to be a successful company committed to competing according to the principle of fair competition and the rules of professional ethics with the most qualified competitors in the sector.

REFLEXX considers Ethics and Corporate Social Sustainability indispensable to gain and maintain its stakeholders' trust. The company considers a strong culture of personal and professional integrity to be the basis for sustainable and profitable growth.

Therefore, it is committed to carrying out its business with the utmost ethical rigour through an updated Code that reflects the culture of excellence and integrity that drives the company.

REFLEXX conducts its business according to the principles of fairness and transparency in the assumption of risks, both towards customers and within the company. It is with this in mind that the corporate *governance* system has been set up and implemented.

These commitments led to this Code of Ethics, whose purpose is to:

- define REFLEXX's fundamental ethical principles;
- establish rules of conduct for those working for and with it;
- promote dialogue, engagement, and consensus among these individuals;
- indicate the basis of a voluntary agreement for ethically regulating relations between REFLEXX and its partners and stakeholders.

In pursuing its corporate mission, REFLEXX will ensure that the principles in this Code of Ethics are acknowledged and shared by the management, contract workers, customers, suppliers, and civil society.

As a self-regulating tool not imposed by law, the Code's binding force lies mainly in the adherence of its partners to the ethical values it lays down.

Therefore, the Code of Ethics is aimed at all REFLEXX employees and contract workers, with the goal also being to:

- discourage and highlight possible improper behaviour or conduct that is not in line with the company values and the laws, standards, and regulations that apply to the Company's business activities;
- undertake actions and practices aimed at environmental sustainability and saving energy and natural resources;
- pursue the work ethics while fully respecting human rights, both internally and at the suppliers' premises, rewarding compliance with the standards that apply in the countries where the suppliers operate.

It should be noted that this document supplements, and does not replace, what is indicated in the Articles of Association and in other existing procedures.

This Code of Ethics is a version of the Code aimed at REFLEXX's suppliers and external partners and is made up of three main sections

- general values and principles that the Code is inspired by and that REFLEXX intends to protect and share with its company partners;
- rules of conduct of a particular nature to be followed by recipients of the Code;
- rules for the implementation of the Code and monitoring compliance.

1. RECIPIENTS

The recipients of this Code of Ethics are the Company's suppliers and other associates who directly or indirectly, permanently, or temporarily, establish relationships with REFLEXX in the area in which they operate to pursue its goals.

Based on this, REFLEXX is committed to distributing its Code of Ethics to all interested parties, the correct interpretation of its contents, and making available the tools that promote its application.

REFLEXX trusts that the Code recipients will behave in accordance with the values and principles of the Code, bringing it to the attention of customers, suppliers, and civil society.

The REFLEXX Code of Ethics is set out in a specific Code of Ethics for Suppliers (or Code of Conduct). Signing and complying with the Code is an element of the supplier's evaluation for initial qualification and its maintenance.

REFLEXX also implements the necessary measures for auditing and monitoring the application of the Code itself, putting penalties in place in the event it is not followed. For this purpose, a specific internal body is identified to monitor the application of the Code, among other things.

2. PRINCIPLES AND VALUES

2.1. Principles

REFLEXX is aware that the customer and end user of the products it markets are interested in more than quality and safety, which are guaranteed by compliance with the regulations applicable to the product, process, and management system. Customers now also consider ethical aspects linked to the product and the company that produces it, particularly respect for the environment, transparency regarding the origins of the products, and respect for human rights throughout the production chain.

REFLEXX, therefore believes that it is crucial to pursue:

- Loyalty to the customer and the pursuit of customer satisfaction;
- Respect for the environment and environmentally sustainable development;
- Respect for human rights and sustainable economic and social development.

2.2. Values

REFLEXX refers to the great values of civilisation and democracy set out in the Constitutions of the Republic of Italy and the European Union, and in the United Nations Universal Declaration of Human Rights, recognising dignity, freedom, equality, solidarity, and justice as the fundamental values of civilised life.

In particular, it is fully recognised in Article 41 of the Italian Constitution, according to **which private economic initiative "may not be carried out in conflict with social utility or in such a way as to damage safety, freedom, or human dignity."**

REFLEXX orients its activities toward the principles of social responsibility contained in this Code of Ethics, declaring itself to be free not to undertake or continue any relationship with those who demonstrate that they do not share its contents and spirit and/or who clearly violate its principles and rules of conduct.

Its bodies, members, employees, and external contract workers (e.g., Agents) must comply with this Code.

The company refers explicitly to the following general principles:

- Respect for the individual
- Equality and fairness
- Honesty
- Protection of the safety and health of the workers and those who use the marketed products
- Transparency
- Protection of the environment

These give rise to the values set out in the paragraphs below.

By signing this Code, REFLEXX asks all its suppliers and commercial partners to share the principles and values set out above.

2.3. Relations with the Public Administration

All those who operate in the name of and/or on behalf of REFLEXX and its Suppliers must behave so as not to provoke the Public Administration to betray its principles of good administration and impartiality.

Usually, REFLEXX does not participate in public tenders and does not directly serve public entities. In any case, the individuals the Company entrusts with relations with the Public Administration may not, under any circumstances, behave in such a way as to unlawfully influence the decisions of the Public Administration – for example, to obtain authorisations to market products – in order to give REFLEXX an unlawful or undue advantage or interest.

REFLEXX prohibits and condemns any conduct carried out by those operating in its name and on its behalf:

consisting of directly or indirectly promising or offering money or other benefits to Public Officials and/or Persons in Charge of a Public Service in order to give REFLEXX an unlawful or undue advantage or interest.

aimed at obtaining contributions, funding, or other proceeds from the Public Administration, through forged or altered statements and/or documents, or omitted information or, more generally, as a result of ploys or deception designed to mislead the granting body.

aimed at allocating contributions, subsidies or loans obtained from the Public Administration to purposes other than those for which they were granted, even if of modest value.

2.4. Protection and development of individuals

REFLEXX recognises human resources' central nature and the importance of establishing and maintaining relationships based on reciprocal trust and loyalty. In this sense, those considered human resources are primarily all individuals who provide their work in favour of REFLEXX, even in contractual forms other than employment, such as Sales Agents.

All internal and external human resources are committed to acting in accordance with the obligations outlined in the work contract, as employees, and what is set out in the Code of Ethics. This guarantees performance standards are met and gives confidence that any other behaviours or actions are not tolerated. These commitments are also required of REFLEXX's Suppliers.

Management of the working relationship is based on respect for the individual, fairness, and respect for equal opportunity, without any discrimination based on sex, race, creed, political views, age, or health. Any form of discrimination against individuals is prohibited.

All individuals are hired with regular labour contracts. No form of clandestine labour, child labour, or any form of irregular labour is permitted.

The decision to start an employment relationship or undertake a collaboration agreement must be based on matching candidates' profiles and their specific skills with the company's needs while respecting their equal opportunities. The requested information must be strictly related to verifying the professional and psychological/aptitude requirements while respecting the candidate's privacy and political/social views.

All decisions made as part of human resources management and development are based on merit profiles and/or the correspondence between the expected profiles and those of the individual. The same applies to access to different roles or responsibilities.

Any action raised and implemented against an employee is always in compliance with the rules established in the Workers' Statute and the applicable National Contracts.

The budget goals and performance results, both general and individual, for employees or contract workers, must be objectively possible to achieve in the time available to achieve them and using the means available.

REFLEXX promotes the growth of professionalism through training and sharing knowledge with the conviction that the individual and collective contribution to work processes is an indispensable element for its own development and its people's development.

In managing hierarchical relationships, authority is exercised with fairness and equity, avoiding any wrongdoing. Abuse of authority involves requesting services and personal favours as being due to the hierarchical superior, and any behaviour that constitutes a violation of the Code of Ethics.

In the case of company and/or production reorganisations, the value of human resources is safeguarded by providing training and/or retraining if necessary.

REFLEXX recognises and respects the role of union organisations and their full right to represent the workers and promotes the dissemination of a proper industrial relations system, including by strengthening the participation of workers and trade unions in the company's development.

REFLEXX asks its suppliers to take on the commitments mentioned above to protect and respect the people involved in producing the products sold to REFLEXX, in compliance with the applicable national or local legislation and in line with the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, which provides for:

- Prohibiting forced labour, irregular and mandatory work, as well as any form of modern slavery and human trafficking;

- Preventing any form of child labour (use of children under 15 years of age) and ensuring job security for adolescents (aged 15 to 18);

- Preventing any form of discrimination;

Providing suitable working and rest times as stipulated by applicable legislation and international standards.

2.5. Health and Safety

For REFLEXX, respecting the individual's physical and cultural integrity is a standard ethical value.

REFLEXX is committed to ensuring health and safety in the workplace and exercising the utmost fairness in the employment relationship, complying with applicable laws and contracts. REFLEXX systematically complies with all the measures outlined in the current legislation on health and safety in the workplace and requires the same commitment from its suppliers.

The Company informs, encourages, and raises awareness among its entire staff to prevent carelessness or negligence from undermining its organisational efforts.

Employees and all contract workers must strictly comply with the instructions provided regarding safety.

REFLEXX implements methods to make all safety requirements standardised and under control and systematically monitors the correct adoption of the safety measures.

The health and safety values are also present in the marketed products, which must safeguard the health and safety of those who wear them: ensure adequate individual protection and the benefits of using the product. This is also guaranteed by certifications of conformity with European Regulations and Directives.

These values are also considered when REFLEXX evaluates and authorises its suppliers, which must also follow the same values (see § 3.3).

2.6. Social and Environmental responsibility

Convinced that it is possible to combine profitability with respect for ethical values and safeguarding the environment, REFLEXX's goal is to promote cultural and ethical development in the community along with its economic growth, investing in energy savings and attending to the environmental impact from its activity, primarily paying attention to waste disposal, energy consumption, and the emissions caused by its production activity and subsequent transport.

REFLEXX promotes communication of the culture of solidarity, safety, and prevention.

All those purchasing goods and/or services must act according to the principles of fairness, cost-effectiveness, and quality and operate with due and proper care, verifying the supplier's compliance with the principles of the Code of Ethics, particularly regarding the protection of workers' rights and respect for the environment.

REFLEXX implements methods to make all environmental requirements standardised and under control and systematically monitors the correct adoption of the environmental measures.

Environmental protection is also critical when choosing products to be marketed, guaranteeing as far as possible appropriate disposal and recycling in order to minimise the environmental impact while maintaining high quality standards.

REFLEXX also requires Suppliers that create marketed products to incorporate these values of social and environmental responsibility, especially in product design and production.

Therefore, these values are taken into consideration when evaluating and authorising suppliers (see § 3.3).

2.7. Quality

For REFLEXX, the company quality management system is a cornerstone of the organisation's good practices to satisfy the customer and to meet the needs of the company's owners and workers.

Therefore, the recipients of this Code must scrupulously follow and regularly implement what is outlined in the quality management system.

2.8. Safeguarding the corporate image

REFLEXX's reputation is an intangible asset of the utmost value that allows it to develop relationships of trust with its associates. This reputation is built upon the image the company established over time and is fragile in nature.

In turn, the corporate image depends on numerous factors, the first and foremost being the behavioural ethics of those who represent REFLEXX in any situation and particularly in relationships with the outside world.

REFLEXX trusts that all recipients represent it with professionalism, honesty, seriousness, and correctness to ensure its image is protected.

On the other hand, REFLEXX's image can also be partially influenced by the companies that make the products marketed. For this reason, the company seeks to monitor suppliers and assess possible reputational risks to prevent them from damaging REFLEXX's image if those suppliers are involved in illegal practices, misconduct, or failure to respect human rights.

2.9. Fair competition and advertising

REFLEXX promotes the culture of fair competition in the markets in which it operates, even with its suppliers and commercial partners, and acts in compliance with current, national, and EU Antitrust legislation in its relationships with customers, suppliers, and competitors.

The Company's advertising is transparent, fair, truthful, and suitable so as not to mislead the people to whom they are addressed and not to harm a competitor.

Through the individuals who act on its behalf, REFLEXX does not offer or accept money or goods in any form whatsoever to promote or facilitate the conclusion of business to its own advantage in violation of laws, applicable regulations, or free competition. Courtesy gifts - whether given or received - are allowed when they are of modest value and are not appreciable as a means of seeking favours or privileges in violation of current legislation or the rules of fair competition.

REFLEXX requires the same fairness and correctness from its Suppliers and business partners.

2.10. Protection and confidentiality of personal data, intellectual property, and information

In compliance with current legislation, the handling of personal data related to employees, contract workers, customers, and suppliers (understood as the natural persons who represent them) is carried out with the utmost respect for the dignity of the interested party and their right to privacy and the protection of their personal data.

REFLEXX undertakes to process such data in a lawful, transparent, and proper manner, collecting only relevant data and not exceeding the purposes for which they are collected, in full compliance with EU Regulation 679/2016 and Italian Legislative Decree 196/2003 (Privacy Code).

Personal data is protected by implementing appropriate technical and organisational measures to ensure the confidentiality, integrity, and availability of the data.

REFLEXX suppliers must exercise the same respect and protection of the personal data communicated to them in compliance with the European standard on the protection of personal data.

REFLEXX also respects the intellectual property rights of its partners, industrial secrets, copyrights, software rights, image rights, and publications. Any violation of the privacy and intellectual property rules may lead to disciplinary and legal action.

The use of any instrument contrary to the company's adopted ethics to obtain private information of third parties is severely forbidden. Even after leaving the company, employees must protect confidential information and may not divulge them under any circumstances.

The same respect for intellectual property rights and confidential information is expected of REFLEXX's Suppliers and Partners:

2.11. Transparency in relationships with Supervisory Authorities

REFLEXX's communications to the Supervisory Authorities and the public are thorough, not misleading, clear, and timely. They are only carried out by the corporate bodies and the relevant corporate function. Protection of informational transparency is facilitated by compliance with the applicable provisions and the internal procedures adopted on the subject.

2.12. Associations and politics

REFLEXX's actions are governed solely by the principles in its Articles of Association, within a framework of respect for all opinions.

REFLEXX may contribute to the funding of associations and non-profit organisations and support political parties and/or their information agencies, committees, organisations, or political candidates, in compliance with the Articles of Association and applicable legislation.

REFLEXX may entertain normal commercial or legal relations with those subjects in compliance with the laws, applicable regulations, and this Code of Ethics.

REFLEXX management authorises donations to charity organisations on the condition that they are not carried out in order to obtain a personal, financial, or political advantage for any Public Official or customer/supplier/third party. Donations must not be made with the purpose being to influence the beneficiary inappropriately or in exchange for any business advantage, and they must meet the following guidelines:

It must be indicated whether they are in line with the approved annual budget.

Beneficiaries may only include charities and non-profit organisations established and registered in full compliance with the applicable legislation.

All donations must be traceable and accurately documented in writing.

The beneficiary must be a respectable charity organisation and have a good reputation.

2.13. Conflict of interest

Recipients of the Code of Ethics will not carry out acts in which they have potentially conflicting interests, even indirectly, with those of REFLEXX, such as, for example, personal or family interests of a financial or business nature with customers, suppliers, or competitors.

A conflict of interest occurs if a director, manager, employee, or contract worker pursues or attempts to pursue for themselves or a third party an objective that differs from the one pursued by REFLEXX or voluntarily procures or attempts to procure a personal advantage when carrying out an activity performed in REFLEXX's interest or procures or attempts to procure such for third parties. Therefore, corrupt practices, illegitimate favours, collusive behaviour, and solicitations, directly and/or through third parties of personal and career advantages for oneself or others and other similar behaviour are prohibited.

REFLEXX management, its employees, and contract workers refrain from giving and/or receiving gifts of any kind and value in the context of working relations, except of symbolic value and according to usual business practices, paying particular attention to relations with employees of the Public Administration.

REFLEXX's customers and suppliers are expected to refrain from giving gifts that could induce the Code recipients to conduct themselves in a manner that conflicts with the moral and other interests of the Company.

REFLEXX recognises and respects the right of its employees and contract workers to participate in investments, business, or other types of activities outside of those carried out in REFLEXX's interest, provided that those activities are permitted by law and by contractual and statutory provisions and are compatible with the obligations undertaken as employees or partners.

Any situation that could constitute or cause a potential conflict of interest must be promptly communicated to the hierarchical superior so the proper measures can be taken. In particular, all REFLEXX shareholders, employees, and contract workers must avoid conflicts of interest between their personal and family economic activities and their responsibilities within their facility. Conflicts of interest include, but are not limited to, the following situations:

- holding senior management positions or having significant economic or financial interests with REFLEXX suppliers, customers, competitors, or business partners, including through family members;

- using the position at REFLEXX or information acquired through work in such a way that a conflict of interest could be created between the individual's personal interests and REFLEXX's interests;

- performing any type of work activities for customers, suppliers, competitors;

- accepting or offering money, favours, or benefits to or from individuals or companies that are in or intend to enter into business relations with REFLEX.

2.14. Use of IT

REFLEXX prohibits any practice that could violate the confidentiality of its computer systems or those of public or private third parties or cause damage to them in any way or aimed at falsifying a public or private computer document that can be used as evidence.

REFLEXX requires compliance with applicable legislation on the processing of personal data and the implementation of its own IT policies in the use of company-owned IT tools.

2.15. Ethical Communication

REFLEXX communicates clearly, honestly, and coherently with the various interested parties. This includes any communication method currently in use. Any communication carried out in REFLEXX's name is subject to Management approval and requires adequate preparation.

Relations with *mass media* are reserved exclusively to the departments and responsibilities to which they are delegated. REFLEXX communicates accurate and transparent information to the outside world.

Employees and contract workers do not provide information to the outside world, nor do they undertake to provide it, without the authorisation of the appropriate departments.

In no way, shape, or form do employees and contract workers offer payments, gifts, or other benefits aimed at influencing the professional activities of mass media or that could reasonably be interpreted as doing so.

3. RULES OF CONDUCT

3.1. Common standards

REFLEXX recommends the recipients of this Code to assume responsible behaviour in compliance with achieving the Company objectives and in line with its values and principles.

Each operation and/or transaction must be legitimate, documented, recorded, and verifiable at any time.

REFLEXX condemns any conduct that involves changing the accuracy and veracity of data and information contained in financial statements, reports or other corporate communications required by law.

The recipients must conduct themselves properly and transparently when performing their functions, particularly concerning any request made by the Owner or by the Public Authorities in charge of checks and/or controls, maintaining an attitude of availability and maximum cooperation.

3.2. Contract workers

REFLEXX appreciates the importance of the contribution of its contract workers, agents, and external consultants to the Company's daily business and asks them to operate with honesty, diligence, seriousness and in compliance with the instructions given in relation to the assignment.

REFLEXX manages relations with its contract workers fairly and with equality and mutual respect.

Contract workers avoid taking personal advantage of the working relationship, acting only in REFLEXX's interest. They adequately preserve and protect REFLEXX's assets, information regarding intellectual property, and personal data at their disposal for the activity entrusted to them with the same guidelines as those applicable to employees in the previous point.

REFLEXX requires its contract workers to comply with the ethical principles herein, considering it to be of fundamental importance to initiate or continue a business relationship.

3.3. Suppliers

REFLEXX will apply the necessary diligence to verify its suppliers' conformity with the international Corporate Responsibility standards. The same approach will be applied when selecting new suppliers. The activities REFLEXX will undertake to meet this requirement include:

- a) effectively communicating the Social Responsibility requirements established in this Code of Ethics to the supplier's management;
- b) assessing significant risks of non-compliance with obligatory regulations and Social Responsibility standards by suppliers;
- c) making reasonable efforts to ensure that these significant risks are adequately addressed by suppliers and by the organisation itself, when and where appropriate, prioritising according to the possibilities and resources to influence them;
- d) establishing monitoring activities and keeping track of the suppliers' performance to ensure that the risks are addressed effectively.

REFLEXX requires its suppliers to comply with the ethical principles herein, considering it to be of fundamental importance to initiate or continue a business relationship. Every supplier, business partner, or external contract worker must be informed of the Code of Ethics and the commitments required under it.

The goods and services purchasing processes are based on the search for competitive advantage, equal opportunities for those involved, fairness, and impartiality.

Supplier selection and the determination of the purchase conditions are based on the following criteria:

- objective assessment of the quality and ability to supply and guarantee goods, services, and adequate performance levels, even based on past performance;
- duly documented availability of means, including financial means, organised structures, technical knowledge, skills, and resources in relation to the work to be carried out;
- the partner's professionalism.

In procurement relationships and, in general, in those for the supply of goods and services, the Legal Representative of REFLEXX, as well as its employees and contract workers, must:

- adopt objective and transparent evaluation criteria when selecting the supplier;
- not impede anyone meeting the requirements from competing for the contract;
- comply with the contractual conditions;

avoid awarding contracts, orders, assignments or supplies to subjects who do not demonstrate compliance with the applicable regulations regarding labour, occupational health and safety, or products and processes;

maintain a frank and open dialogue with suppliers, in line with good business practices.

Signing a contract with a supplier and managing the relationship with them is based on mutual fairness and clarity.

4. COMPLIANCE WITH THE CODE

REFLEXX undertakes to distribute the Code of Ethics to all recipients and to publish it on the Company's website.

4.1. Observation of the regulations contained in the Code of Ethics

Each recipient of this Code of Ethics must be familiar with the regulations contained in it and the reference regulations governing the activities carried out within the scope of their function, arising from the Law and/or from REFLEXX's internal procedures, provisions, regulations.

Each recipient must also explicitly accept their commitments under the Code of Ethics. In particular, the recipients must:

refrain from conduct contrary to the regulations contained in the Code;

adequately inform every third party with which they come in contact in the work environment of the existence of the Code and the commitments and requirements it sets forth for external subjects;

require compliance with the requirements that are directly related to their business;

adopt appropriate internal initiatives and external ones if among their responsibilities, in the event of the failure of third parties to comply with the regulations in the Code of Ethics.

4.2. Violations and penalties

Compliance with the Code of Ethics is an integral part of the recipient's contractual obligations.

Supplier:

Name and first name:

Function:

Signature