



**INTERNAL REGULATION OF OPERATIONS
(SUMMARY)**

“FLEXOPACK Polska Spółka z ograniczoną odpowiedzialnością”

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Introduction

The Company under the name “FLEXOPACK SOCIÉTÉ ANONYME COMMERCIAL AND INDUSTRIAL PLASTICS COMPANY” and with the distinctive title “FLEXOPACK S.A.” (hereinafter “Flexopack S.A.”) is a major European flexible packaging manufacturer listed in Athens Stock Exchange since 1996. It is required by the recent Greek Corporate Governance Law (4706/2020) that each major subsidiary of Flexopack S.A. adopts an Internal Regulation of Operations (hereinafter “IROS”) which describes the internal rules and regulation of operations applied to its operations.

Moreover, each subsidiary should develop the Internal Regulation in line with all other corporate governance laws applicable as they derive from its operations.

In this context, the Internal Rules and Regulations (or “Rules and Regulations” or simply “Regulation”) of the subsidiary company under the name “FLEXOPACK Polska Spółka z ograniczoną odpowiedzialnością” (hereinafter referred to as the “Company”) is a document of the Company which aims at the presentation of its organizational structure, taking into account its size and business objective as well as the corporate Policies and Procedures that the Company applies.

The Company is obliged to ensure the access to the Regulation by the persons liable to comply with this particular Regulation, by any appropriate means.

This document is a summary of the Regulation and briefly presents its specific provisions.

1. Persons Obligated to Comply with the Regulation

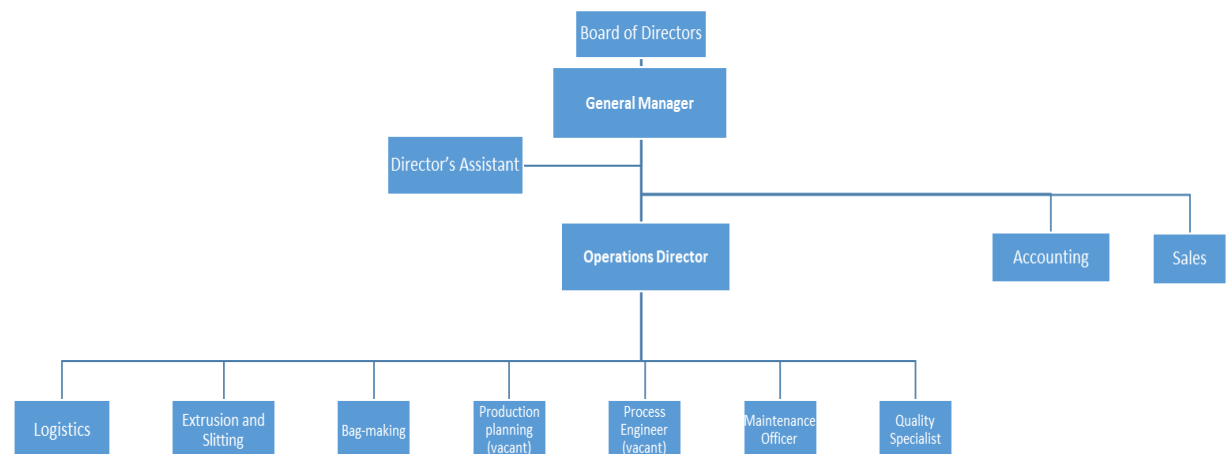
The Company's Rules and Regulations constitute a set of principles and rules of conduct that bind:

- The members of the Management Board (hereinafter “the Management Board” or “the Board of Directors” or the “BoD”),
- The Executives, as well as
- The other personnel of the Company

2. Organizational Structure of the Company

2.1 Organizational Chart of the Company

The current organizational chart of the Company is depicted as follows:



2.2 Board of Directors

The Management Board is the highest executive body of the Company. Its composition and responsibilities are determined by the Company's Articles of Association and the current legal and regulatory framework.

2.2.1 Responsibilities of the Board of Directors

The Management Board is authorised to make any decisions not reserved for the other governing body of the Company, i.e. the General Meeting. The Management Board shall manage the Company's assets and affairs with due diligence required in business relations, and comply with the provisions of law, the provisions of the Company's Articles of Association and of the resolutions adopted by the General Meeting.

The Company's Management Board shall consist of the President of the Management Board and members of the Management Board.

2.2.2 General Manager

The responsibilities of the General Manager include the following:

- Overall supervision and leadership of all aspects of company's activity,
- Designing strategy and setting goals for growth, as well as policies and processes,
- Overseeing team structure and motivation,
- Maintaining budgets and optimizing expenses

2.3 Company Unit Descriptions and responsibilities

The organization of the Company is carried out with its structure in separate divisions and departments as follows:

- Operations Director
- Accounting
- Sales Department
- Logistics
- Extrusion and Slitting
- Bag-making
- Production planning (vacant)
- Process Engineer (vacant)
- Maintenance Officer
- Quality Specialist

The reporting lines of each organizational unit are reflected in the organizational chart of the Company.

The objective and the main task per organizational unit are described below:

2.3.1 Operations Director

Operations Director is responsible for:

- ensuring that production and logistics operations are carried out in the most appropriate, cost-effective way,
- setting goals and monitoring operations effectiveness through KPIs,
- improving systems, processes and best practices,
- ensuring that staff follows health and safety regulations.

2.3.2 Accounting

Accounting Department's purpose is to:

- Coordinate maintenance of company's accounting records,
- ensure compliance with tax and legal regulations,
- prepare regular financial reporting, perform ad hoc financial analysis,
- cooperate with external auditors and other external bodies.

2.3.3 Sales Department

It aims at prospecting and acquiring new customers as well as at ensuring day-to-day cooperation with existing customers.

2.3.4 Logistics Manager

The Logistics Manager is responsible for the following:

- Planning, coordinating, monitoring and optimizing logistics operations such as:
- warehousing, inventory, transportation, procurement;and
- supervising warehouse staff and logistics specialists.

2.3.5 Extrusion and Slitting coordinator

The role of the Extrusion and Slitting coordinator is to supervise operations of Extrusion and Slitting departments, optimize production cost and effectiveness and manage production

teams.

2.3.6 Bag-making coordinator

The Bag-making coordinator optimizes production cost and effectiveness and manages production teams.

2.3.7 Production planning Department

The main objectives of Production planning Department are the creation and maintenance of production schedules in a way to maximize production and labor efficiency and minimize scrap level.

2.3.8 Process Engineer

The Process Engineer:

- monitors production processes,
- analyzes and optimizes process efficiency and cost-effectiveness,
- proposes and implements process improvements.

2.3.9 Maintenance Officer

The Maintenance Officer is responsible for coordinating and executing maintenance plans, as well as ad hoc repairs.

2.3.10 Quality Specialist

The Quality Specialist:

- ensures effectiveness of quality control procedures and processes, as well as quality systems compliance with standards and regulations,
- directly cooperates with customers in all matters related to product and service quality,
- manages quality complaint process.

3. System of Internal Controls

The Company adopts the system of internal controls of Flexopack S.A. and moreover design and operate an adequate system of internal controls according to its size and scope of operations.

The system of internal controls is defined as the set of internal control mechanisms and procedures, including risk management, internal control and regulatory compliance, that continuously covers every activity of a company and contributes to its safe and efficient operation.

The policies and procedures that constitute the internal control system of the Company are designed by the appropriate units of Flexopack S.A. (i.e. HR, Finance, Legal) and accepted by Flexopack S.A.'s top management.

3.1 The system of internal controls of the Company should at least include the below components:

3.1.1 Internal Audit: Reference to the mission and scope of the Internal Audit Unit of Flexopack S.A that includes audits to the subsidiaries as per the Internal Audit Plan approved by the Flexopack S.A.'s BoD.

3.1.2. Risk Management: Reference to the Risk Management Policy and Procedure of Flexopack S.A. monitored by the Audit Committee of Flexopack S.A..

3.1.3. Compliance: Reference to the compliance procedure of Flexopack S.A. monitored by the Audit Committee of Flexopack S.A..

Risk Management

The Company implements the Risk Management Policy and Procedure of Flexopack S.A. which aims at the timely and effective treatment of risks which may have a negative impact on the achievement of its business objectives.

Risk Management is a systematic process for the Company that aims at the timely and effective identification, analysis, control, management and monitoring of any type of risk involved into the operation of the Company. The steps to apply in the annual Risk Management process are as follows:

1. Preparation of Risk Profile Revision Proposals
2. Submission of Risk Profile Revision Proposals
3. Conducting Risk Management Team Meetings
4. Approval of Risk Profiles and Action Plan
5. Action Plan Monitoring - Reports

The Board of Directors of the Company has the overall responsibility of the risk management framework related to the operations and the achievement of the Company's objectives. The Company's Management takes the decisions related to the risk assessment, plans and implements appropriate safeguards for the management of those risks, based on the risk tolerance of the Board of Directors.

The Risk Management Policy and Procedure adopted by the Company is included in the Appendix to these Rules and Regulations of Operation.

4. Procedure for Recruitment of Senior Managers and Evaluation of their Performance

The Company forms a clear framework for hiring new senior executives and managing their performance. This framework is described in the Procedure for Hiring and Evaluating the Performance of Senior Executives.

The Company's Management continuously monitors the existing team of executives and evaluates its composition (skills / knowledge / experience), in relation to the long-term strategy and goals of the Company.

Also, the performance of the executives is evaluated based on the criteria and the goals that have been set together with each corresponding executive at the beginning of the year.

The above Procedure is included in the Appendix to these Rules and Regulations of Operation.

5. Conflict of Interest Policy and Procedure

The Company adopts and implements the Policy and Procedure for the Prevention and Management of Conflict of Interest Cases of Flexopack S.A. in order to create a framework of mechanisms and rules for the prevention and / or recognition and effective treatment of conflict of interest situations between the Company and its executives or a third party to whom responsibilities have been assigned by the Board of Directors of the Company.

The Procedure clearly describes the obligations of the above liable persons, the potential situations of conflict of interest and the mechanisms for prevention, recognition and response to situations of conflict of interest (written notifications to the Board, abstention from voting on BoD issues, etc.).

The Board of Directors is responsible for the observance and implementation of the above Procedure and in particular for dealing with actual or potential conflict of interest situations.

The above Policy and Procedure is included in the Appendix to these Rules and Regulations of Operation.

6. Training Policy

The Company recognizes the importance of the continuous learning and development process that should be taking place within the Company and at all levels, as a tool of advancement, which contributes to its sustainability and productivity. For this reason, the Company supports the members of the Board of Directors and its executives in strengthening their knowledge, abilities and skills and implements a relevant Training Policy of the Board Members and Executives.

The above Policy is included in the Appendix to these Rules and Regulations of Operation.

7. Sustainable Development Policy

Flexopack S.A.'s vision is to have a strong international presence and a parallel contribution to sustainable development. Sustainability is one of the pillars of the Group's strategy and is fully integrated into its business model.

The framework of Sustainable Development that governs the Group is reflected in the Sustainable Development Policy implemented by the Company and is based on the following pillars:

- Corporate Governance
- Market
- Human Resources
- Environment
- Local Society

The above Policy is included in the Appendix to these Rules and Regulations of Operation.

8. Code of Ethics and Ethical Behavior

The Company applies in the context of its operation a set of rules and principles that contribute to the achievement of its economic, production, social goals and govern the interactions between employees, external partners / suppliers and the wider community.

The purpose of this Code of Ethics and Ethical Behavior is to define the commitments of the Company and its employees regarding the principles and rules that should govern each aspect of its operation and the relations between the Company, employees and all stakeholders.

The above-mentioned Code is a guiding tool for demonstrating good professional conduct, ethics and integrity and is included in the Appendix to these Rules and Regulations of Operation.

Appendix

α/α	Text
1	Risk Management Policy and Procedure
2	Procedure for Recruitment and Evaluation of the Performance of Senior Managers
3	Conflict of Interest Policy and Procedure
4	Training Policy of Board Members and Executives
5	Sustainable Development Policy
6	Code of Ethics and Ethical Behavior