



# CODE OF ETHICS

Rev.3

Approved by the Board of Directors of I.S.B. S.r.l.  
at the sitting of 14<sup>th</sup> Dec 2023

## Contents

|       |                                                          |   |
|-------|----------------------------------------------------------|---|
| 1     | INTRODUCTION                                             | 3 |
| 2     | BUSINESS ETHICS                                          | 4 |
| 2.1   | Legal compliance                                         | 4 |
| 2.1.1 | PSCR                                                     | 4 |
| 2.2   | Fair dealing                                             | 4 |
| 2.3   | Fair competition                                         | 4 |
| 2.4   | Protection of intellectual property                      | 4 |
| 2.5   | Trade controls                                           | 4 |
| 3     | WORK ETHICS                                              | 5 |
| 3.1   | Criteria                                                 | 5 |
| 3.2   | Freedom of association and employment                    | 5 |
| 3.3   | Child labour                                             | 5 |
| 3.4   | Pay and benefits                                         | 6 |
| 3.5   | Working time                                             | 6 |
| 3.6   | Non-discrimination                                       | 6 |
| 3.7   | Personal data                                            | 6 |
| 4     | Health and safety of the worker                          | 7 |
| 4.1   | Work safety                                              | 7 |
| 4.2   | Preparing to emergency situations                        | 7 |
| 4.3   | Occupational accidents and illness                       | 7 |
| 4.4   | Demanding work                                           | 7 |
| 4.5   | Machine safeguarding                                     | 7 |
| 4.6   | Personal protection devices                              | 7 |
| 5     | RESPECT FOR THE ENVIRONMENT                              | 8 |
| 5.1   | Environmental authorisations and reporting               | 8 |
| 5.2   | Pollution prevention and Reduced Exploiment of Resources | 8 |
| 5.3   | Hazardous Substances                                     | 8 |
| 5.4   | Air emissions and water discharges.                      | 8 |
| 5.5   | Product content restrictions                             | 8 |
| 6     | MANAGEMENT                                               | 9 |
| 6.1   | Responsibility                                           | 9 |
| 6.2   | Compliance                                               | 9 |
| 6.3   | Communication                                            | 9 |
| 6.4   | Whistleblowing                                           | 9 |

# 1 INTRODUCTION

I.S.B. Srl and its subsidiaries S.D. Srl and M.V.S. Srl, hereinafter referred to as Gruppo ISB, are companies operating in the production and subcontracting of metal components made from wire and strip, sheared and assembled materials.

Gruppo ISB is committed to conducting its business and activities in a socially responsible manner with respect for the environment, its employees and all who enter in any kind of relationships with Gruppo ISB .

Gruppo ISB sets out principles of business conduct: compliance with laws, management transparency and correctness, trust and cooperation with stakeholders. These principles are adopted for an efficient and fair market competition, to improve Customers' and Suppliers' satisfaction and to develop skills and professional growth of its human resources.

The board of directors of Gruppo ISB that approved this Code of Ethics has instructed the vice chairman of the board of directors Mr. Francesco Silvestri to monitor the activities of Gruppo ISB so that they are conducted in compliance with it.

Paragraphs 1,2,3 and 4 set out standards relating to business ethics, employee treatment, health and safety and environmental responsibility. Paragraph 5 sets out the elements of the management systems that will help ensure compliance to this code of ethics.

## 2 BUSINESS ETHICS

### 2.1 Legal compliance

Gruppo ISB will comply with all applicable laws and regulations in the territories and business areas in which it operates.

#### 2.1.1 PSCR

The ISB group, for the DUNS no. 433781846, manage the characteristics/products under reglementary and safety by identification of a person designated as PSCR who, working transversally to the organization, guarantee their respect applying proper procedures.

### 2.2 Fair dealing

No bribes or other means of obtaining an undue or improper advantage (such as money, gifts, promises of any kind and nature) shall be offered, paid or accepted by Gruppo ISB.

Fees or commissions for services rendered by third parties must be for legitimate business purposes.

The Purchasing department as well as other departments of the Group are not authorized to receive money or gifts of any kind for no reason whatsoever.

### 2.3 Fair competition

Gruppo ISB shall comply with the competition laws in force in the territories in which it does business.

### 2.4 Protection of intellectual property

Gruppo ISB respects third party intellectual property and confidential information and will not take advantage of such third party assets which are protected by law, registration or contractual agreements such as, for example, NDA, Supply Specifications, etc...

### 2.5 Trade controls

Gruppo ISB will comply with the applicable import and export laws and regulations for obtaining the licences needed for the import and export of goods, services, technologies and information.

### 3 WORK ETHICS

The work ethics not only relates to the conduct of individuals but also to the organization of relationships. As a matter of fact working activities, and accordingly the responsibility of individuals, cannot be considered in juxtaposition to one another, but they are dependant to one another, and they are very much likely to be affected in a more or less evident way. The inevitable fragmentation of work in different phases and in distinct figures, while giving rise to different degrees of responsibility, must be not understood as a waiver to answer for personal conduct. For this reason, Gruppo ISB promotes the awareness of workers and is committed to making them understand that the quality (in terms of accuracy, timing, observance of the rules, etc.) of the work done may affect other downstream activities with consequent strong impacts on the finished product. The aim is to avoid the so-called "passing the buck" attitude while outlining precise fields of action and responsibility.

#### 3.1 Criteria

Gruppo ISB will observe all laws and regulations of the countries in which it operates, and is committed to uphold the human rights of its employees on the basis of dignity and mutual self-respect.

#### 3.2 Freedom of association and employment

All work undertaken by employees will be provided on a voluntary consent basis and all workers will be free to leave employment upon reasonable contractually defined and binding notice.

Gruppo ISB will not employ or engage any forced or bonded labour.

No employees will be required to permanently release to Gruppo ISB, or any non-governmental labour agency, their original identity papers such as work permits or passports for the entire duration of their working relationship.

Gruppo ISB will maintain open and direct engagement and involvement with all employees to ensure best working practice. All employees will be allowed to associate freely and join or not any legally authorised labour unions and associations and where relevant, seek representation, join workers councils and forums as provided for, and in accordance with local laws.

All Employees are free to openly communicate with management regarding themselves, working conditions and such matters without fear of reprisal, intimidation or harassment.

#### 3.3 Child labour

Gruppo ISB will not engage for work, either directly or indirectly, any person who is defined as "a child". The term "child" refers to any person under the age of 15 (or other age where the law of the country permits) or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Gruppo ISB may use legitimate and supervised workplace apprenticeship programmes which comply with all local laws and regulations.

### 3.4 Pay and benefits

Remuneration paid to all employees of Gruppo ISB shall comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws and the contractual terms entered into by the relevant employees, all such personnel shall be compensated for approved overtime. Gruppo ISB shall only make such deductions from wages as are allowed by law or by its contract with the relevant member of employees.

Gruppo ISB shall, in accordance with local laws and regulations, maintain proper records of how both remuneration and agreed contractual benefits are calculated and paid.

### 3.5 Working time

Normal working time will comply with all local laws and regulations and not exceed the maximum set by whatever method of calculation established by local law. All employees shall be allowed their agreed contractual vacation which must be in accordance with local laws and regulations.

Working time for all employees must be set and supervised in such a way to avoid unnecessary strain or hardship which could give cause to loss of productivity and/or an increased likelihood of injury or physical or mental illness.

### 3.6 Non-discrimination

Gruppo ISB will ensure employees will be free from any form of harassment and unlawful discrimination within the workplace, whilst carrying out normal duties.

Gruppo ISB will provide reasonable opportunities for people with disabilities, as a minimum, always complying with local laws and regulations.

Gruppo ISB will comply with all applicable local laws, regulations and legislation regarding maternity and paternity, including leave and alternative employment opportunities.

Gruppo ISB will ensure that no employees are discriminated against on the basis of race, colour, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status.

Gruppo ISB will select individuals for employment and promotion based on merit and ability demonstrable or demonstrated whilst carrying out normal duties.

### 3.7 Personal data

Gruppo ISB will ensure that it has adequate safeguards and procedures to guarantee that all personal data are held on a confidential basis and will be only communicated to third parties when required by local laws and regulations or with the consent of the individual.

## 4 Health and safety of the worker

Gruppo ISB recognises that ensuring that a healthy and safe working environment is fundamental to achieving its business objectives and to the quality of products and services that it provides to its customers.

### 4.1 Work safety

Gruppo ISB will adequately assess and control work place hazards and exposure to dangerous situations through organised monitoring of any health and safety concerns/risk/accident.

### 4.2 Preparing to emergency situations

Gruppo ISB will put in place action plans that will protect employees and the business from emergency situations such as fire and flooding. Drills will be regularly carried out to ensure preparedness in the event of emergency situations. In order to guarantee adequate preparation in case of emergency situations, regular exercises will be carried out (simulation of emergency situations).

### 4.3 Occupational accidents and illness

Systems and procedures will be put in place to manage and measure performances in terms of accidents and illness.

### 4.4 Demanding work

Gruppo ISB will identify where employees are involved in repetitive or physically demanding work and ensure, complying with any applicable laws and regulations, that such practices are assessed and control measures are implemented to minimise impact upon employees.

### 4.5 Machine safeguarding

Gruppo ISB will assess, in accordance with the maintenance plans implemented, all machinery and systems for risk of injury or accident to personnel. To this end, locking devices (ex. Emergency buttons) and appropriated safety measures will be provided to comply with local legislative requirements as a minimum protections.

### 4.6 Personal protection devices

ISB Group systematically distributes suitable personal protective equipment (ex. Anti-crush/anti-cut shoes, ear protectors, safety goggles, gloves, appropriate clothing, etc.) to prevent injury to all employees and all visitors including contractors operating at ISB premises.

## 5 RESPECT FOR THE ENVIRONMENT

Gruppo ISB recognises its responsibility for environmental impacts on the way in which it conducts its business. It shall seek to minimise any adverse impact upon the environment, as well as to reduce waste or excessive use of natural resources.

### 5.1 Environmental authorisations and reporting

All requirements for approvals, permits, monitoring will be obtained and maintained in compliance with local regulations.

### 5.2 Pollution prevention and Reduced Exploiment of Resources

For both ethical and financial reasons Gruppo ISB will seek to eliminate or reduce waste of all types and recycle materials within the limits of practicability ex. by separate collection or recycling of paper.

### 5.3 Hazardous Substances

Chemicals and any other hazardous materials will be handled, stored, recycled and disposed within a systematic and controlled process and in accordance with the relevant laws and regulations.

### 5.4 Air emissions and water discharges.

Air emissions of Volatile Organic Chemicals (VOCs). Ozone Depleting Chemicals (ODCs), aerosols and corrosive materials will be monitored, controlled and treated as required by local legislation. The same for water discharges.

### 5.5 Product content restrictions

Gruppo ISB will adhere to applicable legislation and regulations regarding the prohibition, restriction and disposal of specific substances as set out in applicable REACH, RoHS directives.

## 6 MANAGEMENT

### 6.1 Responsibility

As specified above, Gruppo ISB will identify a representative within upper management for ensuring the implementation of this Code.

### 6.2 Compliance

Compliance with the code of ethics is verified, among other, during internal audits for all functions / departments.

### 6.3 Communication

The existence of this Code will be communicated to:

- to employees of Gruppo ISB through HR management,
- suppliers of Gruppo ISB through the General Supply Specifications,
- to the customers of Gruppo ISB in writing (ex. email).

### 6.4 Whistleblowing

Gruppo ISB will ensure that any employee who has a concern that a member or another employee is behaving illegally or in breach of this Code can raise such concerns openly and confidentially without fear of reprisal. [See also addendum “Procedura Whistleblowing”](#).