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1. Company Presentation

Established in the late 1960s, MB FIX SRL SB took its first steps in one of Italy's most important heating districts, producing mechanical fixing systems.

Thanks to innovation and the quality of its products, ranging from fixing systems to bathroom accessories, MB FIX quickly distinguished itself in the market, becoming the preferred choice for that niche of customers most attentive to safety and practicality in solutions, with particular success in the German market.

Today, thanks to the determination gained through almost fifty years of experience and in-depth knowledge of the market, MB FIX is ready to offer the most suitable solutions for every customer need, from radiator manufacturers to wholesalers or distributors of thermo-hydraulics, as well as directly to the end customers.

Registered office	Via Beata Giovanna 63 – I-36061 Bassano del Grappa (VI)
Office and production site	Via Madonna Nera 2B – I-31030 Borso del Grappa (TV)
Vat number	IT02072300243
Commercial register entry	VI6254
Certified e-mail	mb.amministrazione@cert.assind.vi.it

2. Our Commitments

In order to better respond to the needs of the market and to be better able to face the challenges of the future, the company has adopted an integrated system with ISO 9001, ISO 45001 standards and has chosen the legal form of a Benefit Society. The company has expressed its commitments in its corporate policy, which is the foundation of its values and commitment. The policy can be found at the following link:

https://mb-fix.com/en/about_3.htm

3. Stakeholder Involvement

This code of ethics is disseminated to all stakeholders in the context of normal business relationships, to the following categories:

- ✓ Suppliers of raw materials and processing;
- ✓ Contractors and service providers;
- ✓ External collaborators;
- ✓ Consultants;
- ✓ Business partners.

The company's internal staff is informed about the contents of the code of ethics and it is available for consultation within the company premises. Periodic information sessions on the contents of the code are held for all personnel.

Other stakeholders may be identified by the Management.



The code of ethics and company policy are available to all customers and other external stakeholders on the company website, at the following link:

https://mb-fix.com/en/about_3.htm

MB FIX SRL SB**REQUIRES**

That the recipients and all signatories of this code of ethics commit to respecting what is defined in this document and in the company policy.

3.1 Suppliers and Collaborators

Suppliers collaborating with the company are required to read the code of ethics and the company policy and to sign them. During contractual negotiations, management proposes adherence to the code of ethics to its suppliers. All information regarding **MB FIX SRL SB**, production processes, company structure, served clients, customer and supplier contacts and references, price lists, may not be disclosed in any form (including photos and videos), except with express authorization from management.

3.2 Internal Staff and Training

The company's personnel represent the most valuable asset for management, ensuring the continuity and success of the company. Upholding the commitments of the company policy and realizing them through the integrated system and code of ethics are constant corporate objectives. To ensure the dissemination, knowledge, and application of principles and rules established by the integrated system, the following procedures have been defined:

- ✓ Upon the entry of a new resource, the policy and code of ethics are handed out and explained by the personnel manager;
- ✓ Periodically, specific training activities are organized on aspects covered in the code of ethics, with particular focus on health and safety in the workplace and environmental issues.

These activities are documented, and worker representatives are involved in the planning process.

4. Compliance with International Standards

The content of this code of ethics has been developed based on principles outlined in the company policy, and considering legislation from the United Nations, ILO, European and national laws. The following have been considered:

- ✓ International Labour Organization (ILO) conventions.
- ✓ United Nations Convention on the Rights of the Child.
- ✓ Universal Declaration of Human Rights.
- ✓ United Nations Convention on the Elimination of All Forms of Discrimination against Women and All Forms of Racial Discrimination.
- ✓ International Covenant on Civil and Political Rights and on Economic, Social, and Cultural Rights.



- ✓ All national and community laws, including Legislative Decree 81/2008 and subsequent amendments, concerning health and safety in the workplace.
- ✓ All national and community legislation regarding environmental matters.
- ✓ European Regulation 679/2016 regarding the protection of personal data and the free movement of such data.

5. Child Labor

The company does not employ, or in any way support, the use of child labour. On recruitment, a copy of an identity document is taken as verifiable proof of age. No underage workers are employed within the company. Activities and projects with schools are possible within the framework of school-work alternation programs.

In any case, the company takes all necessary actions to remedy child labor that may be required if a worker employed by the company has falsified identification documents or if a case of child labor is identified at a supplier within the supply chain. In such cases, relevant authorities and NGOs (such as Telefono Azzurro or Save the Children) will be informed, and the company is available to support initiatives for the protection of minors.

6. Forced and Compulsory Labor

The company does not engage in, nor support, the use of forced or compulsory labor. Original identification documents or any documents that could force workers to remain in the company against their will are not retained. The company does not require personnel to pay "deposits" at the beginning of their employment.

The company does not withhold any part of a staff member's salary, compensation, property or documents in order to force him/her to continue working for the organization.

When hiring, workers are not required to pay commissions or costs associated with their employment.

Workers are free to leave their job without constraints, providing reasonable notice to the employer. Workers are free to terminate their employment in accordance with current national laws and the National Collective Bargaining Agreement (CCNL). Absolute support is not given to human trafficking.

All overtime hours are voluntary, and full freedom of movement within company premises is ensured, with only the limitations necessary for occupational health and safety regulations. Overtime work is requested by the company.

7. Health and Safety in the Workplace

The company considers it a fundamental commitment to promote the health of workers and ensure safety within the workplace, by setting up an internal health and safety organization, adopting a voluntary standard to improve performance, constantly assessing the risks present and taking all necessary measures. It has established an internal health and safety organization, adopted voluntary standards for performance improvement, continually assesses existing risks, and implements all necessary measures. Fundamental to this, is the training of personnel and the involvement of workers' representatives (RLS) on the measures taken to reduce risks and prevent accidents.

The company commits to fulfilling obligations under Legislative Decree 81/2008 and subsequent amendments.



7.1 Workplaces

The company ensures a safe and healthy work environment where hazards are identified and assessed. It has implemented all appropriate measures to prevent and reduce risks to workers' health and safety, in compliance with current legislation.

Workplaces are clean and well-maintained, ensuring accessibility to emergency routes and proper maintenance and periodic inspection of fire protection systems.

7.2 Safety Organization

The company commits to:

- ✓ Ensuring the presence of a specific team responsible for safety, trained to handle their responsibilities and manage emergencies.
- ✓ Developing and implementing an emergency management plan outlining actions staff must take in case of fire or other emergencies. The premises have automatic fire safety systems subject to regular checks and maintenance, and emergency tests are conducted periodically.
- ✓ Training and informing workers and visitors about workplace risks. If workers use equipment, they must be trained in its correct use and the emergency measures and devices present.
- ✓ Providing workers and visitors with personal protective equipment (PPE) as required by risk assessments.
- ✓ Conducting health surveillance of workers according to the health protocol established by the competent doctor.
- ✓ At least once a year a meeting is convened with the employer, the competent doctor, the workers' representatives (RLS) to verify and plan health and safety activities.

7.3 Chemicals

The company commits to identifying hazards and assessing risks to workers' health and safety from the use of substances and preparations. There is a specific chemical risk assessment, identifying measures adopted by the organization. The company undertakes, based on available resources, to use less hazardous chemicals for workers' health and safety, with particular attention to chemicals classified as carcinogenic, mutagenic, teratogenic, or reprotoxic.

Substances are stored in designated areas, and personnel handling substances are trained in specific risks. The company provides collective and individual protective measures (PPE) to workers exposed to chemical risks.

8. Freedom of Association

The company fully respects the right of all personnel to form, join, and organize unions of their choice and to engage in collective bargaining with the organization. The company declares maximum openness to dialogue with unions. The company does not in any way hinder workers from joining a union.

9. Discrimination

The company does not engage in or support any form of discrimination in hiring, compensation, access to training, promotion, termination of employment, or retirement based on race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family



responsibilities, marital status, union membership, political opinions, age, or any other condition that could lead to discrimination.

Under no circumstances does the company interfere with personnel exercising their rights to follow principles or practices, or to meet needs related to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions, or any other condition that could lead to discrimination.

The company does not subject personnel to pregnancy or virginity testing.

The company promotes prevention and control of improper behaviors, including inappropriate language, gestures, inappropriate verbal tones, and harassment of any kind.

10. Disciplinary Practices

The company commits to managing all personnel with dignity and respect. The company has adopted a graduated system for managing disciplinary measures, in line with current legislation and the relevant National Collective Bargaining Agreement (CCNL).

11. Working Hours

The company complies with the provisions of the national collective bargaining agreement for the metalworking industry sector and relevant national legislation. In particular: the average normal working time must not exceed 40 hours per week.

- ✓ a maximum of 12 hours of overtime per week may not be exceeded;
- ✓ Each worker is entitled to a minimum rest period of 11 hours within a 24-hour period;
- ✓ Breaks are provided if the daily working hours exceed six hours;
- ✓ Every seven-day period, workers must have a continuous rest period of 24 hours, normally on Sundays, in addition to the 11 hours of daily rest;
- ✓ Each worker must be granted paid annual leave of at least four weeks.

12. Compensation

The company commits to establishing employment relationships regulated by the relevant National Collective Bargaining Agreement (CCNL) of the sector. The company ensures that salaries and compensation always meet or exceed the minimum levels prescribed by law or the collective bargaining agreement and are always sufficient to meet the basic needs of personnel and provide extra income for discretionary purposes. In particular, the company pledges not to use collective agreements or other types of contracts that do not guarantee dignified remuneration, always sufficient to meet the primary needs of personnel, and provide some discretionary income.

The company guarantees that workers always receive a detailed breakdown of their salary and allowances. The national employment contract details the reasons that may lead to disciplinary measures and possible deductions for disciplinary purposes. The payment date and method are contractually established.

The company does not enter into contracts where the type of collaboration contract is abused to avoid regularizing the worker's contribution position, nor does it apply false apprenticeship schemes to evade labor and social security obligations.



13. Respect for Intellectual Property

The company commits to ensuring and protecting intellectual property and patents, equipping itself with organizational and operational tools for the defense of its assets.

Employees are prohibited from disclosing to third parties or competing companies any sensitive company and customer information of MB FIX SRL SB. They may not disclose names of key personnel responsible for clients, or information or technical data related to productions carried out, in progress or to be carried out.

14. Protection of Personal Data and Privacy

The company commits to complying with EU Regulation 2016/749 on the protection of personal data. Personal data is processed exclusively for the purposes prescribed and functional to the exercise of business activities, and for reasons established by current legislation. Data is protected by company security systems, regularly maintained and updated. The company has adopted an internal organizational structure for privacy and provides individuals with all information regarding the management of their personal data.

15. Anti-Corruption and Management of Gifts

The company commits to not offering, promising, or requesting bribes, and opposes solicitation of bribes, requests to conceal or disguise financial flows and corporate resources, with public or private interlocutors, or to falsify tax or fiscal matters, and maintains transparent and fair relations with internal and external collaborators and public authorities.

It is forbidden for employees to request or receive subsidies in cash or in any other form, such as gifts, prizes, or other forms, from third parties or suppliers in order to favor preferential purchases of materials or goods compared to other third parties. The management of donations or the receipt of gadgets or goods of modest value, for promotional purposes or on anniversaries or festivities, are managed by informing the management, which operates with transparency.

It is forbidden for suppliers or external workers to offer financial compensation or in any other form to MB FIX SRL SB employees to receive supplies or commissions in preference to other suppliers or workers. The assignment of production orders to external workers over others in return for subsidies in cash or any other form of benefit is also prohibited.

16. Transparency in Business Relationships

The company is committed to combating unfair commercial practices with all means at its disposal, towards its customers, distribution networks and in its supply chain. Only credit institutions operating on the national territory and traceable financial circuits are used, and in compliance with national and European provisions, with particular reference to payments and credit card management.

17. Criminal and Terrorist Associations

The organization undertakes not to support or promote directly or indirectly criminal or terrorist associations of any kind. If, in the course of its activities, there are reasonable grounds or potential contacts with these phenomena, the company undertakes to immediately contact the competent authorities and report the incident.



18. Environmental Protection

The company is committed to protecting the environment as a fundamental resource for future generations, in accordance with company policy, in the following forms:

- ✓ Compliance with national environmental legislation;
- ✓ Combating the negative effects of climate change, supporting biodiversity conservation projects, such as bee-friendly forests and bees in the territory;
- ✓ Careful monitoring of energy consumption to avoid waste and a progressive introduction of technological solutions to reduce consumption;
- ✓ Waste reduction, especially hazardous waste;
- ✓ Progressive reduction of packaging and replacement of current materials with recyclable materials;
- ✓ Promoting practices to prevent environmental incidents;
- ✓ Choosing less polluting and environmentally impactful chemicals
- ✓ Training staff on environmental issues and sustainability.

For reporting on environmental activities and commitments made, see the following paragraph.

19. Communication and Periodic Reporting

In relation to the commitments made, the company has chosen to be a Benefit Company and has adopted a periodic reporting system, aimed at all stakeholders, to communicate its performance and the state of fulfilment of its commitments. This reporting is done annually, with an "**Impact Report**" communication, which is published on the company's website, at the following link:

https://mb-fix.com/en/about_3.htm

The report is communicated within the company, at periodic meetings, and is available for consultation by interested parties on the company notice board.

20. Reports and Complaints

If stakeholders, internal and external, need to report to the company, or lodge a complaint, for violations of this code of ethics, including by company personnel, they can use the following channels:

Company website: <https://mb-fix.com/en> in the contacts section;

E-mail: eticalclaims@mb-fix.com

By **post** to the following address:

MB FIX SRL SB
Via Madonna Nera 2B
I-31030 Borso del Grappa (TV)

The reporting system can also be used by employees and collaborators within the company, in order to report violations of this code of ethics, abuse, harassment and violence, or discriminatory behavior.



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The company undertakes to respond within 15 days in writing, or in the manner indicated by the complainant, ensuring the confidentiality and anonymity of the complainant. The report will be reviewed directly by company management.

Borso del Grappa, 22 Maggio 2024

CEO

Daria Rodighiero

For acceptance

Date:

Company / Professional:

Sign:
