







MEETING STANDARDS IS OUR STANDARD

date	rev.	notes	QSM DRAFTING	DO AUDIT	CDA APPROVAL
25/10/2021	17	Policy update	L. Bonomi	L. Banomi	S. Bonomi L. Bonomi







QUALITY - SAFETY - ENVIRONMENT - INTEGRATED MANAGEMENT MANUAL§

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Company background

The Bonomi family has been managing the business for seven generations; it stated in Lumezzane (BS) – Italy as a bronze foundry and continued over the years with taps and fittings manufacturing for the Italian agriculture market. In the second half of the 20th century, Silvio Bonomi decided to start producing brass ball valves and launched the export activities of the company.

Timeline

1954: Silvio Bonomi and his brother Oreste founded Eredi di Bonomi Silvio (using their late father's name)

1965: Company name changed to Rubinetterie utensilerie Bonomi (RuB)

1973: Starts production and export of hot forged brass ball valves.

1974: Production moved to a 5,000 m² modern facility

1978: Investments are focused mainly on the ball valves production.

1981: Company surpasses for the first time yearly production of 1,000,000 ball valves.

1984: Company makes its first investment in IT equipment with a 34 IBM system for the management of orders, warehousing, purchases and administration.

1991: Production facility enlarged to total 8,000 m²

1994: US subsidiary, RuB,Inc., is established in a suburb of Minneapolis, Minnesota and a warehouse is opened near Boston, Massachusetts.

1995: Company obtains the Lloyd's Register certification of its Quality System to ISO 9002, which is later upgraded to ISO 9001 in 1998.

2001: Company surpasses 8,000,000 ball valves annually Construction of an additional building specially designed for docking areas.

2005: The US warehouse is moved from Boston to Minneapolis in order to rationalize the branch management.

2006: New facilities for extension of the assembly department. Total covered surface reach 12,500 m²

2007: Japanese subsidiary RuB, kk. is established in Tokyo.

2009: SAP and a new MES are implemented.

2010: SAP is implemented also in North America and Japan.

2012: LEAN Project is launched and company management and teamwork set up.

2014: RuB celebrates its first 60 years of activity with employees and their families.

2015: A 5.000 m² warehouse with offices is built in Shakopee – Minnesota.

2017: The Company is reorganized; an operational holding "Hadron Srl" is created to manage the Administration, Finance and Control, Human Resources, Information Technology, Quality System and Marketing areas of the Group.

2018: Shedstone Srl is born, a company to manage the Holding's real estate properties.

2019: A new 8,000 m² facilities for production and assembly department and a fully automated warehouse is constructed right next to the existing ones. The total covered surface is now 20,000 m²

The 65th anniversary of the Company is celebrated with the participation of Founder and historical customers.

2020: Innovative machinery for the processing, assembly and handling of products is being installed with the aim to improve employee ergonomics and make the production process even more efficient and safe.

2021: A new Services Building with large changing rooms and canteen for employees is open.







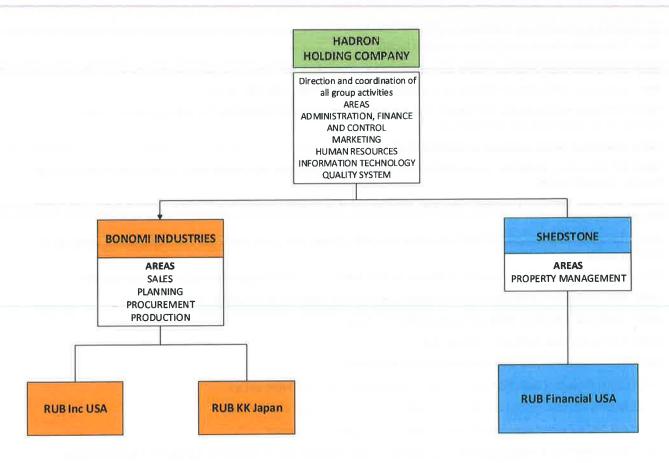
2. Corporate Organization

The Group's Parent Company, Hadron Srl, coordinates the activities of BONOMI INDUSTRIES Srl and Shedstone Srl, which in turn manage the USA and Japan branches.

The Parent Company Hadron is entrusted with the management and coordination of the following areas: Administration, Finance and Control, Human Resources, Quality System, Marketing and Information Technology

BONOMI INDUSTRIES is entrusted with the following areas: Sales, Engineering, Procurement and Production.

Shedstone is entrusted with the real estate management.



The Administration Board that has the following responsibilities governs the Corporate's Companies:

- Establishing an integrated Company Management System articulated in processes,
- Assignment of tasks and responsibilities,
- Policy and Target drafting.

A management review is conducted every year, on the basis of which the company policies are confirmed or changed.

The organizational structure of each department is detailed in the organizational charts; job descriptions are also provided for each function.







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A Steering Committee is set up and comprises the following functions:

- **Business Management**
- **Operational Management**
- **Financial Management**
- Sales Management
- Plant Management
- **Technical Management**
- **Human Resources Management**
- **Quality System Management**

Based on the Board of Directors' policies and directions, the Steering Committee establishes the operating guidelines.

Employees are organized into the following areas:

Sales: 14 %

Production: 62 %

Technical services: 15 %

In-house services: 9 %

Their responsibilities are detailed in relevant processes.

The Holding is committed to invest heavily in personnel training, covering various areas:

- Technical skills: SAP, FMEA, LEAN Production, CN programming, language skills, updates and upgrades of IT systems for engineering design, in-process monitoring and control.
- Interpersonal and organizational skills: process-based work, graphic language, e-mail management, meetings management, internal training management, training to train, sales techniques.
- Training of trainers: employees from each production department have been selected and trained by an external specialist to become tutors for new entries or internal movers.

The "Organizational Wellbeing" project is moving forward with the support of external consultants to improve employees' work experience. A periodic "listening center" collects and reports anonymous considerations and proposals. With these tools, the Group not only promotes knowledge and technical skills, but also the importance of employee contribution to the company's success.

By implementing these initiatives, the Holding promotes not only the knowledge and technical skills, but also individual awareness that each employee contributes to the success of the company as a whole.

Assignments are distributed in compliance with the rules and regulations governing employment relationships and based on the skills of each individual.

Special care is devoted to the work environment. In both the offices and the factory, tasks and responsibilities are assigned with particular care to ensure proper functioning of the various areas and the risks that might impair workers' health and safety are evaluated.

The new warehouse and the Services Building were designed to minimize environmental impact and to obtain maximum energy savings though features such as underfloor heating and solar panels.

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3. Company Policy

The Management, supported by decades of company history and experience, solid growth, export expansion, investments and the competence and dedication of its employees, renews its commitment to face the future in its many and complex aspects throughout the following defining principles:

THE CUSTOMER

The Management

Puts Customer satisfaction first, keeping the focus on a relentless pursuit of service excellence over competitors.

THE CENTRALITY OF PEOPLE

The Management

- Believes in the centrality of people and continuous training as a means to achieve customer satisfaction and expected results
- Pursues a Company-guided managerialization
- Is committed to ensuring safe and healthy working conditions, eliminating hazards and reducing risks
- Pursues employee engagement for the continuous improvement of Workplace Safety, prevention of Injury and Occupational Illnesses, and respect for the Environment

ETHICS

The Management

- Ensures full compliance of processes and products to the governing European and international laws, regulations and directives
- Believes in family business, as bearer of values to be shared with collaborators and suppliers
- Aims its efforts to reduce product and company impact on the environment

TECHNOLOGICAL DEVELOPMENT

The Management

Seeks constant technological renewal of production processes in the utmost respect for safety and the environment as well as waste reduction in all forms.







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4. Context and stakeholders

The analysis of the in-house and outside context and of the stakeholders are developed within the Management's Review.

The context analysis is structured as it follows:

- 6 areas of the external context 25 factors
- 5 areas of the in-house context 15 factors

With analysis concerning the requirements of the stakeholders.

The Holding endeavors to meet customers' requirements by maintaining, among other things, good business relationships with our stakeholders.

The partner members of the Bonomi family, guide the company offering their know-how acquired over the years and with a view to technological development, which entails ongoing improvement of products and processes, and with the ultimate goal to exceed customer's expectations and develop the company presence in industrialized markets globally.

The Holding's Companies seek to ensure our employees' job security over time and provide them with training on specialized subject matters in order to achieve professional and personal growth. We also take care of the health and safety in the workplace while ensuring continuous improvement.

We recognize the importance of developing good relationships with our suppliers who can, rely on continuity and stability of orders over time. Thanks to our procurement schedule, we can guarantee the collection of materials. Our supply contracts stress the importance that product specifications and delivery terms are complied with.

We actively maintain a knowledge-sharing approach with our subcontractors (die-makers, assembly workshops, galvanization firms), to the benefit of the final user who receives our lifetime warranty. Last but not least, we guarantee payments within the agreed deadlines.

The Holding's Companies are involved in social activities, in accordance with national and international laws and regulations, by supporting various initiatives in the field of assistance to people in need and medical research.

In the framework of our sustainable development policy, all production activities are carried out respecting the environment, including ongoing research and waste minimization.

5. Risk assessment

Based on the context analysis and on the stakeholders' expectations, the Management identifies the risks and opportunities and it plans consequent actions to manage them with the goal of reducing risk and maximizing opportunities.

The risk assessment and plan of action are developed within the Management Review.

The managers of the main processes identify the risks and opportunities concerning every single process by giving inputs during the yearly Management Review.

6. Our Customers

BONOMI INDUSTRIES conducts Business-to-Business transactions with distributors, importers and OEM manufacturers.

Total company export account for over 99% of sales revenues direct and through subsidiaries in the United States and Japan and is supported by an efficiently organized sales network supplying to some 60 countries worldwide.









7. Our products

BONOMI INDUSTRIES is highly renowned for its technological know-how in product design and manufacturing processes.

Efficiency and automation are the foundation of its competitiveness. Our products are designed for long life and our Engineering Centre is continually seeking new solutions and upgrading existing technology and equipment.

BONOMI INDUSTRIES manufactures brass ball valves, components, and accessories, which are available in standard offerings in the catalogue or to specific customer design requirements.

Our products are proudly 100% made in Italy and are used in the construction industry and in industrial equipment and machinery for applications in systems conveying gas, drinking water, sewage, compressed air and numerous other fluids. They comply with ISO, EN, DIN, ANSI, BS and ASME standards, BONOMI INDUSTRIES standards and endless variants and specifications as required by customers.

Raw materials are purchased only from certified suppliers and are accompanied by documents in accordance with the traceability requirements of the pressure equipment directive (PED).

The procurement of materials and resources is optimized by finite capacity scheduling systems.

The current yearly output is about 8,000,000 ball valves and 2,000,000 valve components and accessories, which are produced on fully automated high-performance machines for mechanical working, assembly and testing operations.

Product quality is monitored using computerized systems and Statistical Process Control (SPC) techniques which allow operators to intervene before any pre-set values go out of tolerance per referenced specifications.

Standard valves undergo a severe double seal-test and a series of specific tests carried out in accordance with applicable standards and specifications.

Our products meet the applicable legal requirements and directives:

Pressure Equipment Directive (PED) 2014/68/UE directive

Restriction of Hazardous Substances Directive (RoHS) 2011/65/CE directive

Waste of Electric and Electronic Equipment (WEEE) 2012/19/EU directive

Registration, Evaluation, Authorization and Restriction of Regulation no. 1907/2006 of 18/12/06 Chemicals (REACH)

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In connection with the use, field of application and destination, the valves are approved by leading Certifying organizations, including:

- ICIM Italia
- ARGB-KVBG Belgio
- Australian Gas Association
- BG Technology
- Carso Francia
- CSA International
- LIA Japan

- Deutscher Verein Gas und Wasserfaches
- Factory Mutual Research Corporation
- Hygenic Russia
- TSSA Canada
- Underwriters Laboratories Inc.
- Water Regulation Advisory Scheme

8. Quality, Safety and Environment Management System

The Holding applies the System approach. This means that the company provides an integrated Quality, Health & Safety and Environment System.

The organizational model complies with Italian Legislative Decree 81/2008 on Health and Safety and Legislative Decree 152/2006 for the environment.

The Quality Management System is certified by Lloyd's Register LRQA to UNI EN ISO 9001:2015, covering:

Design, manufacturing and distribution of low-pressure shut-off and regulation devices, related components and accessories, industrial brass valves from 1/8" to 4", actuators and related components and accessories in brass and aluminum, and product made to customer's specification. Provision of services in the following areas: administration, finance and control, human resources, marketing, quality system and information systems.

Compliance with the PED Directive (Pressure Vessels) 2014/68 / EU is certified by ICIM Italia according to Annex III, Module D for:

Ball valves with nominal diameter DN> 25 mm up to 100 mm.

The Company, through its PED Manager, undertakes to keep ICIM Italia, as a PED Notified Body, informed of any changes to the system and / or products.

Quality is controlled as part of an Integrated Process System, which is divided into:

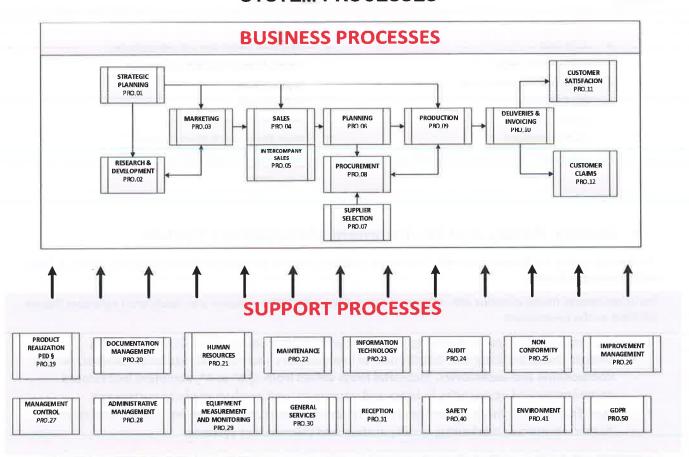
- Business processes: customer-oriented,
- Support processes: management of resources with a direct and indirect impact on business processes.







SYSTEM PROCESSES



The process is considered a "teamwork approach" by employees, where each individual is responsible for his/her own work while sharing the ultimate objectives with others. Processes are described using the inter-departmental flowchart which illustrates how information is exchanged.

The key role is assigned to the Process Owner, who leads the process team and interacts with the Management.

Documents are managed as follows:

- External documents; which are taken as the main reference for the development of BONOMI INDUSTRIES products and the establishment of the in-house document management system, namely laws, mandatory directives and regulations, voluntary rules and agreements.
- Internal documents; which are taken as guidelines in the development of our products to ensure that they comply with the applicable laws, mandatory directives and regulations, voluntary rules and resource management. They are divided into Quality Management documents, technical documents and technicalcommercial documents.

The updated version of the documents relating to Quality, Health & Safety and Environment Management System and Operating Instructions is available for all users in the ARXivar document management program.

The Holding has identified, planned and implemented measurement, monitoring, analysis and improvement processes to ensure that the quality management system, production processes and products meet the specified requirements.







Measurements are made periodically to check the efficiency and are an input parameter for the management review process.

The main reference parameters are:

- Customer satisfaction;
- Internal audits, in compliance with the Pressure Equipment Directive (PED), performed by auditors, who are qualified by Management, based on their knowledge of corporate policy, and specifically trained, and are not the direct executors and/or responsible for the audited processes:
- Processes:
- Product: on receipt of incoming materials, semi-finished products and components.
- Production: tests, dimensional checks and visual inspection, air leak and function tests.

When a non-conforming product is found, it is separated from the conforming product, identified with a tag and segregated in specific containers and/or areas.

Any significant or minor non-conformities of products made to customer specification are assessed by the Operation Manager jointly with Quality Control Manager and the Engineering Center. When contractually agreed with the customer, goods accepted as an exception to requirements are subject to monitoring.

Non-Conformities generate correct actions, which are established after analyzing and determining the Root Cause, by involving the processes and anyone involved in the process. The plan-do-check-act (PDCA) method is used.

The Quality, Health & Safety and Environment Management System is monitored in relation with the objectives of the corporate policy, which are expressed during Management Review. It is subject to continuous improvement thanks to the joint efforts of all the employees and the Lean Production policy.

8.1 **Business Processes**

The Holding procedures are being reviewed:

- TQ indicates the original version,
- PRO indicates the new version.

The response to customer requirements is handled through the following processes:

- TQ.5.01 Management Review
- PRO.04 Sales
- PRO.05 Intercompany Sales
- PRO.06 Engineering
- PRO.07 Supplier selection and evaluation.
- PRO.08 Procurement
- **PRO.09 Production**
- PRO.10 Shipping and Invoicing
- TQ.08.01 Customer satisfaction rating



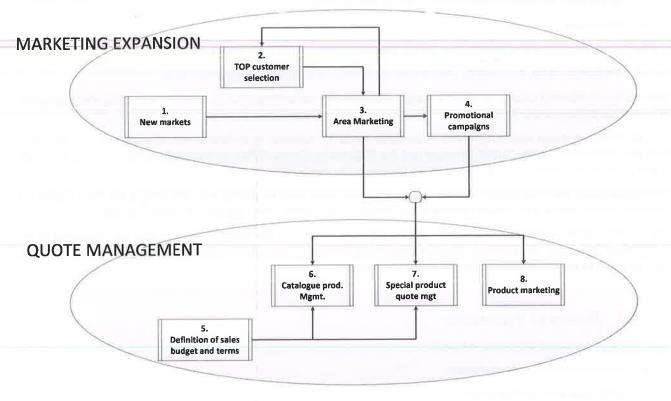




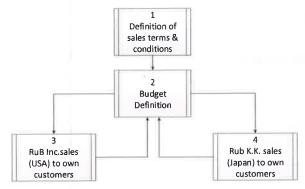
PRO.04 Sales - PRO.05 Intercompany sales

The sales process aims to increase the sales of products and services and ensure the processing of correct and reliable quotes. It also provides directions regarding R&D activities, with special focus on new customer requirements, either expressed or expected. This department works in close cooperation with the new product engineering department.

It keeps the production planning department informed of the information required to comply with the delivery dates agreed with the customer.



Sales activities are also carried out by the United States and Japan subsidiaries with the support of the Italian parent company. Intercompany sales are processed according to procedures that guarantee realtime exchange of information with production planning in Italy, which allows the execution of orders from our subsidiaries within the agreed delivery terms.







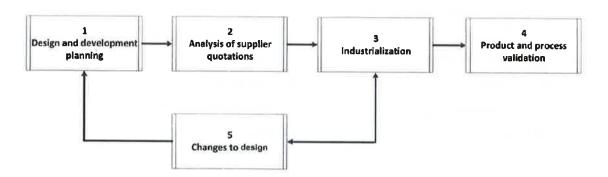


Both processes combine ideally to generate business profitability and promote BONOMI INDUSTRIES products to maintain a competitive edge on global markets.

PRO.06 Engineering

The engineering process is intended to ensure compliance in translating the basic requirements agreed to with the customer into a design in compliance with the PED Essential Safety Requirements.

It also supports and provides the production process with the tools and information required to meet product specifications to develop time and cost estimates. It is strictly connected with Procurement in that it provides technical customer order specifications. Any problems or errors that may arise during production and the use of product are also identified in the development of the process. It is divided into the four sub-processes, which are shown in the chart below.



PRO.08 Procurement

The Procurement process ensures continuity of the production activity in compliance with product specifications, time schedules and profitability. It also ensures the availability of the materials and products required by the various departments within the agreed dates.

The Procurement department converts a need into availability of a product/material, which involves:

- 1. Raw materials for in-house production
- 2. Components, finished products
- 3. Press-forgings: raw materials and outsourced production
- 4. Subcontracted work
- 5. Spares, tools, machinery and equipment
- 6. Consumables (grease, lubricants and accident prevention equipment)
- 7. Boxes, pallets, packaging material

Each type of procurement entails the generation of the order and receipt of material. The process ends with the recording and payment of the invoice to the supplier.







PRO.09 Production

The Production process is intended to meet the need of end customers and ensure supply continuity. The procedure describes how to guarantee the production process continuity in compliance with technical specifications, the deadlines and costs agreed with the customer.

The process starts with the recording of the sales order and ends with product packaging. The production process converts the purchased raw materials into standard catalogue or special products, according to customer requirements, and provides data and information to the Shipping and Billing departments.

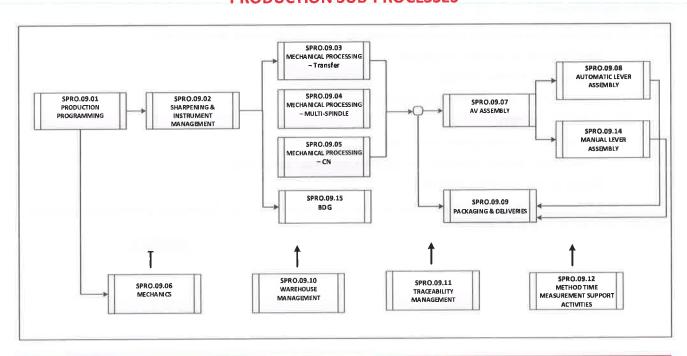
Production is divided into the following 14 sub-processes:

- **Production Planning**
- Tool Sharpening and Management 2.
- 3. Transfer machining
- Multi-spindle machining 4.
- NC machining
- Mechanical engineering
- 7. Valve Assembly

- **Automatic Lever Assembly** 8.
- 9. Packaging
- Warehouse Management
- 11. Traceability
- Support activities 12.
- Manual lever assembly 13.
- 14. BDG

The sub-processes can be connected in series or in parallel. The flow chart below shows the main input/output relationship between sub-processes.

PRODUCTION SUB-PROCESSES









Production planning governs the integration between the sub-processes that generate the transformation of raw materials and semi-finished products and prepare the equipment to be used on production machines.

Tool sharpening and management involves the preparation of tools and gauges used in the production process. Three types of machining are then launched on transfer, multi-spindle and CN machine tools. The resulting products can be conveyed directly to packaging or the valve and lever assembly bays, from where they are moved to the packaging department.

The production process guarantees identification and traceability requirements as follows:

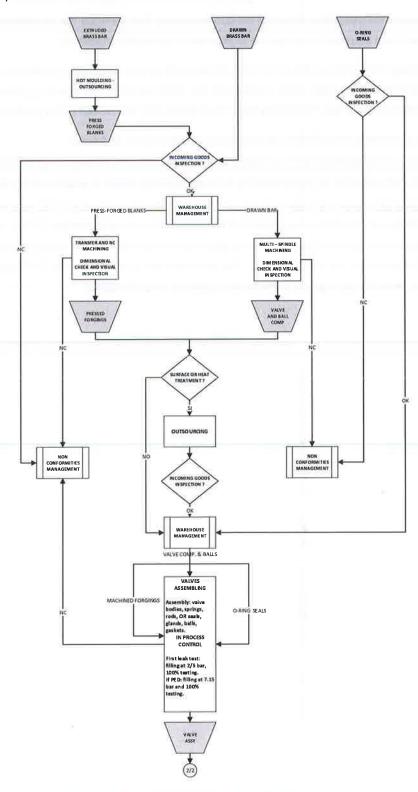
- The identification of all products and components from procurement of raw materials to shipment of finished products to the end customer is guaranteed by barcode labelling, which is processed by the SAP management system.
- Product traceability is a mandatory requirement of the pressure equipment directive (PED). It applies to valve bodies and internal components. Each finished product can be tracked from the supply of blanks and raw materials up to shipment to the end customer. The entire process is handled by the SAP system according to a traceability tree, from the raw material to the finished product, and vice versa.







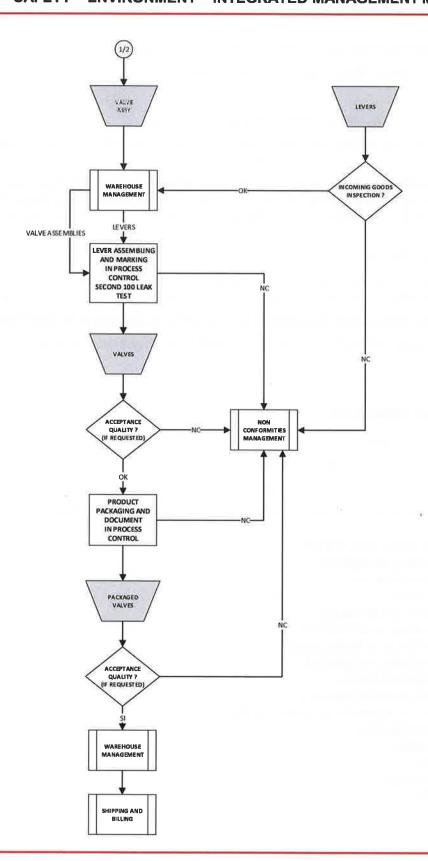
The description of the production flow of standard ball valves follows:

















The following raw materials undergo routine inbound inspection:

- Press-forgings obtained from extruded brass bar, outsourced
- Drawn brass bar
- Purchased components, mainly gaskets, O-ring seals and levers.

Machining on transfer, NC and multi-spindle machine tools convert raw materials into worked parts, valve components and balls.

The valves originate from the mounting of levers and valve assemblies, which are the result of the assembling of pressforged parts and components, balls, gaskets and O-ring seals. All machining and assembling stages undergo routine in process checks performed by the operators. Acceptance tests can also be carried out on request prior and after packaging.

PRO.10 Shipping and Invoicing

The shipping and invoicing procedure starts with the assignment of priorities by date of order and customer, based on the availability of the items ready for shipment and the launch of the procedure for picking up items from the warehouse.

This procedure ends with the issuance and dispatch to customer of the invoice covering the goods supplied.

BONOMI INDUSTRIES adopts the C-TPAT protocol and implements security measures that protect goods supplied against tampering.

8.2 Support processes

The following Holding processes are being reviewed:

- the acronym TQ indicates the original version,
- the acronym PRO indicates the new version.

Support processes ensure business operation and integration. They are identified as follows:

- PRO. 19 PED products manufacturing
- **PRO.20 Document Management**
- PRO.21 Human Resources
- PRO.22 Maintenance
- PRO.23 Information Technology
- PRO.24 Internal and external audits
- PRO.25 Non-Conformity Management
- PRO.26 Improvement management
- **PRO.27 Management Control**
- PRO.28 Administrative Management
- PRO.29 Control of monitoring and measuring equipment
- PRO.30 General Services
- PRO.31 Secretariat
- PRO.40 Safety
- PRO.41 Environment
- PRO.50 GDPR







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9. Lean Production

BONOMI INDUSTRIES adopted the Lean Production concept in 2012. The choice was dictated by the need to increase competitiveness with the support of all those involved in corporate activities.

A team of 15 people from different departments within the Company was originally put together. A training program was also scheduled covering two topics: lean production and how to increase motivation and commitment among employees.

The team was led by an independent consultant, who helped develop the Value Stream Mapping (VSM) of company's main processes. Activities without added value were identified and the team outlined improvement plans for various work groups aimed at reducing waste in production and office. These mainly involved setup times, machine downtimes, response time to customer requests, documents flow.

To date, almost all employees are or have been involved in improvement plans. The basic tools are: training, pro-active approach to improvement using lean production methods, such as the 5S and SMED method and non-conformities management using the A3 method.

The implementation of the Lean Production method is a powerful instrument for BONOMI INDUSTRIES to invest in people. The benefits in terms of productivity and customer satisfaction are visible and are expected to increase further in coming years.

"RuB People Think Lean" is not just a slogan, rather the tangible proof of the corporate keywords: teamwork and sense of responsibility. This way, people really become central element of the company's success.

The Organizational Wellbeing project has now taken on the task of generating, through a periodic Listening Center, a flow of information, suggestions and remarks between the employees and the Management, aimed at increasing mutual sharing and synergy.

The Lean Production project is on from a technological point of view though new production concepts. Exclusive machinery installed in our company has reduced the transit time in production from a few days to a few minutes and has eliminated all traditional handling activities from lever assembly up to truck loading.







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