

**CODE OF CONDUCT**

PREPARED 28 JUNE 2022 By Liat Sagy HR Director

**TABLE OF CONTENTS**

**Economic Policy, Responsibility, Guidance 3**

**Standards of Conduct & Professionalism**

**Service, Contact with Suppliers and Contractors 4**

**Product Safety & General Safety Standards**

**Emergency Preparedness**

**Workplace Ergonomics, Conflicts of Interest 5**

**Innovation and Organizational Learning  
Work Environment  
Freedom of Association and Collective Bargaining/Representation**

**Equal Opportunities**, **Cooperation and Teamwork 6**

**Workplace Harassment Policy**

**Mutual Aid and Community Responsibility**

**Insider/Internal Information, Fair Competition 7**

**Bribery**, **Gifts, Donations, Corruption & Extortion**

**Forced Labor and Human Trafficking**

**Working Hours, Wages & Benefits****, Employee Benefits 8**

**Reporting, Records 9**

**Confidentiality, Intellectual Property**

**Use of Company Assets 10  
Environmental Law & Natural Resources Managemen*t***

**Compliance, Corporate Governance**

**CODE OF CONDUCT**

The Nordia Springs Code of Conduct establishes general standards and principles for our company. The purpose is to provide guidance and clarification in how we conduct our daily business internally and externally. High business ethics and personal integrity are paramount among our company values.

**Economic Policy**Nordia Springs supplies springs to customers in Israel and worldwide. Our primary and most important contribution to society is to develop high quality metal products for our clients. All aspects of production concerning quality, safety, security, and operation are efficiently and determinably supervised. The company’s processes are strictly monitored by an outside CPA firm.

**Responsibility**

Nordia Springs is committed to efficiency and professionalism. Employees are required to act in accordance with professional standards in seeking best execution of tasks, while efficiently using existing resources in their possession. The employees bear full responsibility for all actions and deeds. It is the responsibility of each manager to ensure that the Code of Conduct is communicated, understood, and acted upon by all employees. Managers are required to promote the Code of Conduct by personal example and are not entitled to permit any exceptions to the required behavior.

Each of us is responsible to know the relevant rules and regulations as stipulated in this Code of Conduct. Failure to act in compliance with the Code of Conduct, including the condoning of it, will result in appropriate disciplinary action. Each employee must promptly report any violations of the Code of Conduct of which they become aware. No employee who raises an issue in respect to the Code of Conduct will be subject to any adverse impact on his or her employment as a result thereof.

**Guidance**The standards set out below are general and do not address each and every situation that may confront you in our global organization. Guidance on the application of the Code of Conduct to particular situations should be sought from your manager or legal advisor via the management team.

**Standards of Conduct & Professionalism**We comply with the laws of our country (Israel) and operate with all relevant international and national industry codes of practice. It is each employee’s responsibility to know the codes of practice outlined herein. Nordia Springs sees customer-related activity as our most important undertaking. Employees therefore, fully consider the possible consequences of their operations and understand the needs of customers in all stages of service.

**Service**The company is committed to a full understanding of the needs of its customers and prioritizing them. Orders are processed competently and in a timely manner, and fulfilled on time. Should supply chain disruptions occur, particularly during the Covid 19 pandemic, the reasons for such delays are promptly communicated to the customer. Nordia Springs also actively works to identify opportunities to add value in our service to customers, and we are committed to rapid solutions to any performance or supply problems that may arise.

**Contact with Suppliers and Contractors**Employees are required to act impartially and fairly, and maintain honest relationships with suppliers and contractors. Employees shall choose their suppliers and contractors in accordance with criteria and professional standards. All negotiations with the company's suppliers shall be fairly administered. The company recognizes the importance of relationships with contractors and vendors and considers it an essential factor for the success of its mission. Therefore, should the need arise, employees must make clear to those with whom we do business the company's requirements and expectations. Nordia Springs’ employees are committed to following all procedures in all stages of the contract, while ensuring compliance with all obligations to suppliers.

**Product Safety & General Safety Standards**Nordia Springs is committed to product safety. A safety check is conducted once per week by a designated Safety Manager in the production facilities and according to the customer requirements and contracts signed. We are committed to ensuring that clients can trust Nordia Springs products for their reliability, quality, and superior performance. All of our products must meet international regulatory standards for metal products (including Conflict Minerals, Reach and RoHS, and IMDS).

Nordia Springs sees great importance in maintaining public safety regarding company operations and contractors. Employees are required to act in accordance with the law and safety and security of the public, as well as the environment, wherever they operate. Employees are required to report the risk factors that can affect public safety, as well as the safety of other employees, customers, contractors, and suppliers.Nordia Springs holds the ISO45001.

**Emergency Preparedness**The purpose of our Emergency Preparedness doctrine to ensure that all Nordia Springs staff are aware of their role in and response to emergencies and disasters occurring within the company and its surroundings (the village of Nordia). The Emergency Response Manual and Procedures, which includes fire safety measures and tools, will be reviewed and annually drilled by the Emergency Planning Manager (Nordia Springs’ Operations Manager) with all employees. Nordia Springs will ensure that all staff have access to a copy of the current Emergency Response Manual. This is kept in an easily identifiable, accessible, and well-recorded location (prominently posted). The policy applies to all Nordia Springs employees. In case of emergency, staff will follow the incident and accident management protocols as outlined in the Emergency Response Manual and in the annual drills referenced above. First Aid training is included in employee preparedness. Non-compliance of this policy will be brought to the attention of the appropriate supervisor or manager for further action.

**Workplace Ergonomics**Nordia Springs ensures that each employee receives comfortable seating, protective equipment (where needed), and a once yearly hearing check for those employees who work at or close to the machines. During the Covid 19 pandemic, a clean health certificate is mandatory for all new workers and vaccination is also obligatory. Air conditioning and fans are provided. We also provide comfortable and safe shoes and work clothes for our technicians whose work stations are designed for efficiency and convenience (placement of tools, bins, etc.).

**Conflicts of Interest**

Nordia Springs’ employees are expected to act in the best interests of the company and disregard any personal preference or advantage. We are expected to fully disclose any personal or financial interests that may conflict materially with those of the company. Nordia Springs adheres to the strictest codes of ethics and integrity. Employees are required to avoid situations that could present conflicts of interest. Therefore, there is no hiring out of information to private subordinates, suppliers, or anyone else having a working relationship with the company. The company's employees are strictly forbidden to accept gifts and/or favors from customers and suppliers. Employees should keep professional integrity and avoid taking advantage of opportunities or information for personal profit as part of their work. In case of a potential conflict of interest, we will seek advice from senior management or from our legal counsel in order to find an appropriate solution.

**Innovation and Organizational Learning**Nordia Springs provides advanced solutions based on modern technology. These solutions require knowledge and professional personnel. Employees are required to share the knowledge and insights gained during their work. Nordia Springs promotes technological innovation by encouraging entrepreneurship and strengthening research and development. Employees take part in the elevation and development of new initiatives. The company encourages the raising of initiatives and the making of proposals for the purposes of optimization and improvement.

**Work Environment**Nordia Springs strives to maintain a work environment free of violence, harassment, verbal and/or physical abuse. Employees are required to report to their superiors any case of suspected improper behavior or violation of the law or Code of Conduct. The company maintains guidelines for the prevention of sexual harassment. Nordia Springs is committed to transparency in data relating to work environment influences.

**Freedom of Association and Collective Bargaining/Representation**Should an employee or employees have a concern about which their direct manager may not be the appropriate party to whom to take it, the company ombudsman (Liat Sagy) should be sought out first. Employees may form a group or groups to represent their collective interests to management, not restrictive to the company ombudsman. An employee representation/empowerment process is key to employees retaining faith in management processes, oversight, and action in the best interests of the collective body. From our earliest beginnings as a village-born, patriotic factory, with common cause an important value, we have always been committed to employees making their feelings known in the interests of the collective good. Thus, Nordia Springs practices an open-door policy and is committed both to hearing out disputes and to early conflict resolution. To that end, we ensure our committees are sensitive, efficient, and effective, and that representatives of those committees are confident and competent. Our cohesive managerial team is proactive, not reactive, and committed to the company as a whole benefiting in the process of listening and responding to the needs of our employees.

**Equal Opportunities**We respect and treat all people equally and will not act discriminatory against any person with relation to sex, religion, race, origin, age, disability or sexual orientation. Nordia Springs adheres to equal opportunities and fairness in the process of recruiting, selecting, and promoting employees in the company, and derides the existence of any kind of discrimination. Our staff has already attended one lecture on Equal Opportunity in the workplace.

**Cooperation and Teamwork**Nordia Springs encourages cooperation and teamwork at all levels. The company upholds cooperation between people as the key to achieving the its goals smoothly and efficiently.

**Workplace Harassment Policy**Nordia Springs works to maintain a work environment free of violence, harassment, verbal and/or physical abuse. Employees are required to report to their superiors any case of suspected improper behavior or violation of the law or Code of Conduct. The company maintains guidelines for the prevention of sexual harassment. Nordia Springs is committed to transparency in data relating to work environment influences. Our anti-harassment policy expresses our commitment to maintain a workplace that's free of harassment so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace. This workplace harassment policy applies to all employees, contractors, public visitors, customers and anyone else whom employees come into contact with at work. Staff has already attended one lecture on sexual harassment in the workplace by a leading lawyer. A follow up is to be scheduled by Liat following a lifting of Covid restrictions. Our anti-harassment policy is prominently displayed, and a female manager appointed anti-harassment coordinator. Punishment for harassment depends on the severity of the offence and may include counseling, reprimands, suspensions or termination.

**Mutual Aid and Community Responsibility**The company is always strengthening its ties with the community, and encourages volunteering through individual efforts and groups of employees for the good of the community.

**Insider/Internal Information**

We will not use or spread any confidential information obtained. In particular we will not use or spread confidential information for trade in securities of any company. In addition, those who are identified as “internal” at Nordia Springs must always adhere to the Insider Directives as issued by the Board of Directors. Our IT Manager checks daily that e-mails from outside the office do not disrupt our daily work, and we employ many mechanisms to guard against cyberattacks. Every employee who uses a computer is required to sign on a confidentiality waiver.

**Fair Competition**

We respect the laws of fair competition and will not participate in any form of unlawful co-operation nor abuse a dominant market position.

**Bribery, Gifts, Donations, Corruption & Extortion**

Nordia Springs takes pride in creating and maintaining ethical and behavioral standards among our personnel that foster cooperation, fairness, integrity and respect for diversity. We exemplify the highest possible ethical, professional, and behavioral standards to clients, customers, partners, and to the village of Nordia in which we operate. Therefore, we do not tolerate any form of bribery and will only offer gifts, entertainment, and personal favors if they are modest in value and if they are consistent with customary business practice and law. We may accept entertainment and gifts that are modest in value and within the bounds of customary business hospitality. The company complies with applicable national anti-corruption regulations and legislation, and international anti-corruption conventions as such provisions are applicable to our business. Our staff do not engage in corruption, extortion or fraud in any form nor use any intermediaries to channel payment in such a way that can be considered as bribery or corruption intended to influence business decisions.

**Forced Labor and Human Trafficking**

Nordia Springs is committed to taking steps to ensure that modern slavery is not taking place in any part of its own business and in any of its supply chains. We expect all members of staff to remain vigilant in identifying circumstances where there is a risk that modern slavery might be occurring in any part of Nordia's business or in any of its supply chains, to report any such circumstances to senior management in full and without delay, and to conduct their own personal and domestic affairs in such a way to ensure that they are in no way connected with modern slavery either through the commission of a criminal offense or through actions or omissions that might bring themselves and the company into disrepute. Nordia Springs expects the same standards from all of its contractors, suppliers and other business partners. The company will seek to ensure, where reasonably practicable, that its contractors, suppliers and other business partners are contractually obliged to comply with terms that reflect the spirit and intention of this Policy in their own businesses and in their own supply chains in support of the general eradication of modern slavery. In all cases, some of the most vulnerable people in society are stripped of their dignity and basic freedoms and forced to work for someone else’s gain or benefit. The most common forms of modern slavery are sexual exploitation, labor exploitation including child labor and domestic servitude. Nordia Springs is committed to transparency in its approach to tackling modern slavery.

**Working Hours**

Nordia Springs operates 7:00 AM to 4:10 PM or 5:00 PM weekdays, and the night shift lasts from 5:00 PM till 4:00 AM. We have a shift schedule as needed. Occasionally we work on Fridays till 13:00 p.m. Saturday nights are open for employees to make up hours lost during the week, from 5:00 PM to 4:00 AM. Our employees may work no more than 12 hours per day/58 hours per week and are required to rest for a minimum of 36 hours at the weekend. Some departments may work after hours too (e.g. customer support, shipping) Employees in these departments follow a shift schedule as needed.

**Wages & Benefits**

The company has received legal advice that we fairly compensate employees—from wages to benefits packages—according to the law.

**Employee Benefits**

Nordia Springs treats its employees with care when it comes to benefits, which include:

* subsidized lunch of great variety
* ability to make up hours
* pension plans
* health insurance
* transportation—company cars, busing, compensation for commuting
* closure of factory during holidays to give technicians and workers rest
* paid leave according to the law
* “fun” days with staff
* holiday gifts
* birthday gifts
* purchase coupons.
* cash gifts for holidays: (up to 400 NIS)
* Employee-of-the-Year recipient receives 1,000 NISin a special ceremony
* other financial rewards for performance/production—awarded to individuals and teams

Note: During the pandemic, employees whose jobs do not require them to be present at our premises may work from home part of the time, or all the time during lockdowns.

**Reporting**All employees and managers are responsible for reliable reporting related to their jobs. Employees are committed to comply with all provisions of law, regulations and requirements of the competent authorities, to cooperate with various government officials and provide information to the authorities exactly and timely. Employees are required to keep the records and full disclosure of all accounting operations performed by them. Employees are required to report immediately in cases where they suspect acts of fraud or theft.

**Records**

We will maintain all accounting and other records in a manner that describes and documents accurately Nordia Springs’ true financial position and results. We will ensure that all communications published by us are full, fair, accurate, timely and understandable. Our communications will not mislead the reader in any way nor omit anything necessary to make them full, fair and accurate.

**Information Safeguards & Privacy**

Nordia Springs implements appropriate confidentiality measures to protect the privacy of customers, clients, and employees, following applicable laws and Privacy Policy. We safeguard customer, client, and employee information and the transfer of technology, services, and know-how in a manner that protects any applicable international, national, and local intellectual property and data protection rights.

**Confidentiality**

Our confidential and proprietary information will be protected and we will prevent inappropriate or unauthorized disclosures. Information is an asset of the company and therefore employees shall use the information belonging to Nordia Springs as part of their work, where it stays. Employees are required to keep the information confidential. Employees are required to ensure the confidentiality of clients, contractors, and suppliers. Employees are required to ensure the implementation of the law on the prohibition or use of inside information. Company employees will use proper and honest information and disclose it only after receiving explicit authorization to do so from their superiors at Nordia Springs. All data transfer should be executed in accordance with the guidelines and respect to the content of information and distribution methods as accepted in society.

**Intellectual Property**We are expected to establish and protect Nordia Springs’ rights in all commercially significant intellectual property and to use those rights in a responsible way. We will also respect the valid intellectual property rights of others.

**Use of Company Assets**Employees are required to make proper use of company assets and all equipment provided to them. Employees are required to be scrupulous about keeping the company's intellectual “know-how” in full confidence.

**Environmental Law & Natural Resources Management**Nordia Springs endeavors to protect and preserve the environment for the future by continuously monitoring and developing our environmental performance. Apart from legal obligations, our company proactively protects the environment. Examples of relevant activities include: recycling, conserving energy and curbing greenhouse gas emissions, reducing waste, waste disposal, using environmentally-friendly technologies, and generally not engaging in practices that would endanger the environment, including wildlife. Nordia Springs operates in a pristine village community and holds itself to the highest environmental standards not only for the environment, but out of respect for the inhabitants of Nordia who enjoy a high standard of living and peace of mind.

Note: the company have installed air cleaning filters and solar panels, as well as alert systems should emissions levels exceed safety and health standards.

As stated above, we possess the IS014001 certificate. In addition, every year we check KPIs for natural resources and environmental issues under measurement. We constantly monitor environmental conditions in each department, including yearly checks for harmful noise. This includes once- or twice-yearly employee hearing medical examinations.

**Compliance**Nordia Springs is committed to meeting all regulatory requirements. We place great importance on maintaining compliance with promises and agreements. Employees are required to ensure timely reporting on any subject related to their work. The company requires employees to meet obligations and timeliness. The company adheres to strict procedures designed to ensuring quality within environmental change.

**Corporate Governance**

We protect the legitimate interests of our shareholders in an appropriate and effective way. Corporate governance considerations are constantly monitored and implemented in our organization and in our procedures. We commit ourselves to open, transparent, impartial, and timely information.