

QUALITY – SAFETY – ENVIRONMENT – INTEGRATED MANAGEMENT MANUALS



MEETING STANDARDS IS OUR STANDARD

<i>date</i>	<i>rev.</i>	<i>notes</i>	QSM DRAFTING	DO AUDIT	CDA APPROVAL
22/04/2024	18	General review	L. Bonomi	L. Bonomi	L. Bonomi S. Bonomi
25/10/2021	17	Policy update	L. Bonomi	L. Bonomi	S. Bonomi L. Bonomi



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1. Company background

The Bonomi family has been managing the business for seven generations; it started 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:** The construction of a new 8,000-m² warehouse adjacent to the existing ones has been initiated and completed. It is equipped with spaces suitable for housing an Automated Warehouse.
- The 65th anniversary of the Company is celebrated with the participation of Founder and historical customers.

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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.

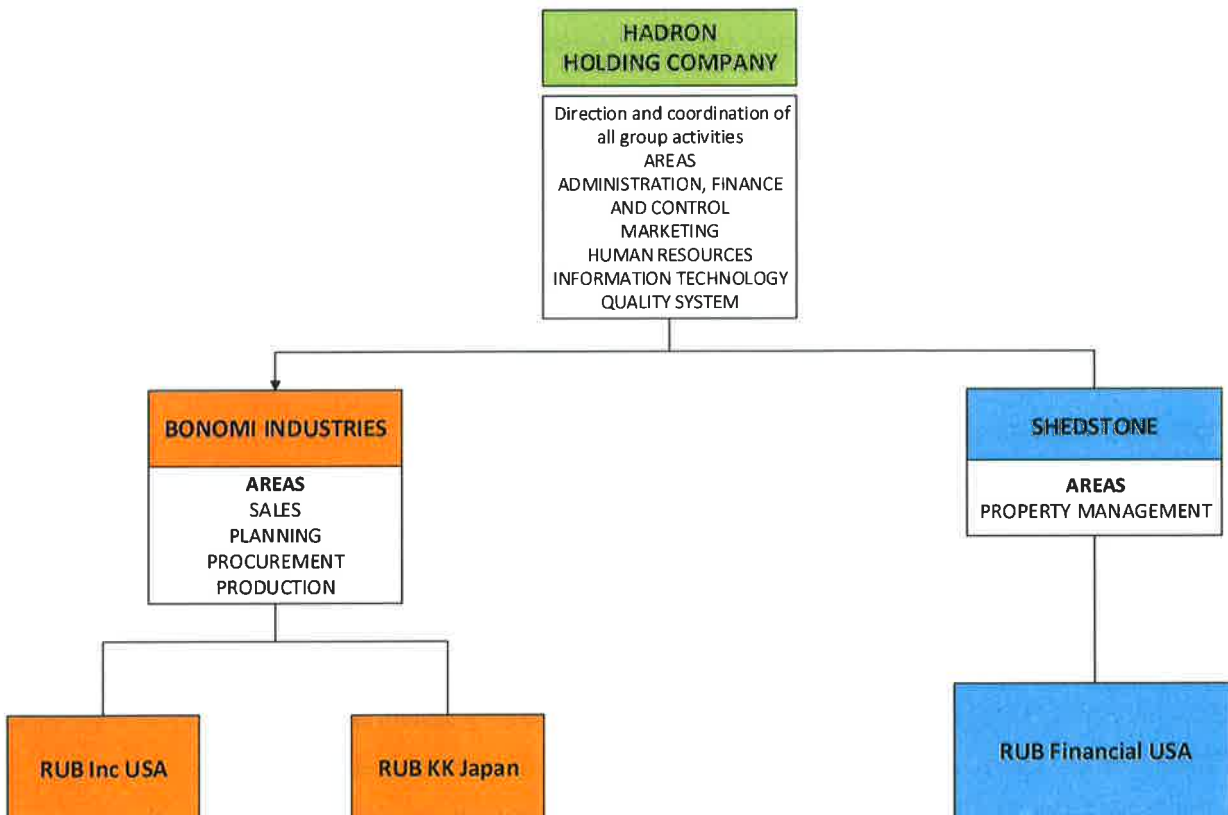
2021: A new Services Building with large changing rooms, classroom and canteen for employees is open.

2021 (November): The Founder, Silvio Bonomi, passes away. He is fare welled with a moving embrace from both old and new collaborators, as well as many suppliers and acquaintances.

2023: The Packaging line with fully automated handling of products, boxes, and cartons becomes operational. Additional machines are installed to complete the investment plan aimed at optimizing the production of STD ball valves; ball production, body production, and end caps up to 2". The project to replace all machinery in the Multi-Spindle Department with Bar Transfers is initiated.

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.



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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. 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: 9 %
- Production: 71 %
- Technical services: 8 %
- In-house services: 12 %

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 also the support of external consultants to improve employees' work experience. A weekly "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 through features such as underfloor heating and solar panels. Additionally, the expansion of the centralized system for collecting heat produced by machinery and compressors is underway. This heat will be used in winter for underfloor heating and to prevent heat accumulation in the production departments during the summer season.

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3. Company Policy

The Management, supported by decades of company history and industry-specific experience, solid growth, export expansion, investments and the competence and dedication of its collaborators, 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 is reviewed and, if necessary, updated annually as part of 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.

Suppliers are highly valued. Through long-term relationships, they perceive continuity and stability: material collections are ensured through scheduling and planning. Supply contracts are not based solely on price, but also on adherence to product specifications and delivery reliability.

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 action plan are reviewed and, if necessary, updated annually during 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.

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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 Italian 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 with the support of SAP management software. The current annual production capacity has increased to 9,000,000 ball valves and 2,000,000 valve components and accessories, which are produced on fully automated high-performance automatic, ensuring high-quality mechanical processing, assembly and testing. Product quality is monitored using computerized systems and Statistical Process Control (SPC) techniques which allow operators to intervene before any pre-set

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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:

- 2014/68/UE directive *Pressure Equipment Directive (PED)*
- 2011/65/CE directive (RoHS 3) *Restriction of Hazardous Substances Directive (RoHS)*
- 2012/19/EU directive *Waste of Electric and Electronic Equipment (WEEE)*
- Regulation no. 1907/2006 of 18/12/06 *Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)*
- 2020/2184 directive *Drinking Water Directive (DWD)*

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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 setup of the Management System is instrumental to the Policy.

The organizational model complies with Legislative Decree 81/2008 and subsequent amendments for Safety and Legislative Decree 152/2006 and subsequent amendments for the Environment.

The Holding applies a system approach by integrating the Quality, Safety, and Environment Systems certified by LRQA (Lloyd's Register) as follows:

According to ISO 9001:2015 for Quality,

According to ISO 45001:2018 for Safety,

According to ISO 14001:2015 for the Environment,

with the following purpose:

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.**

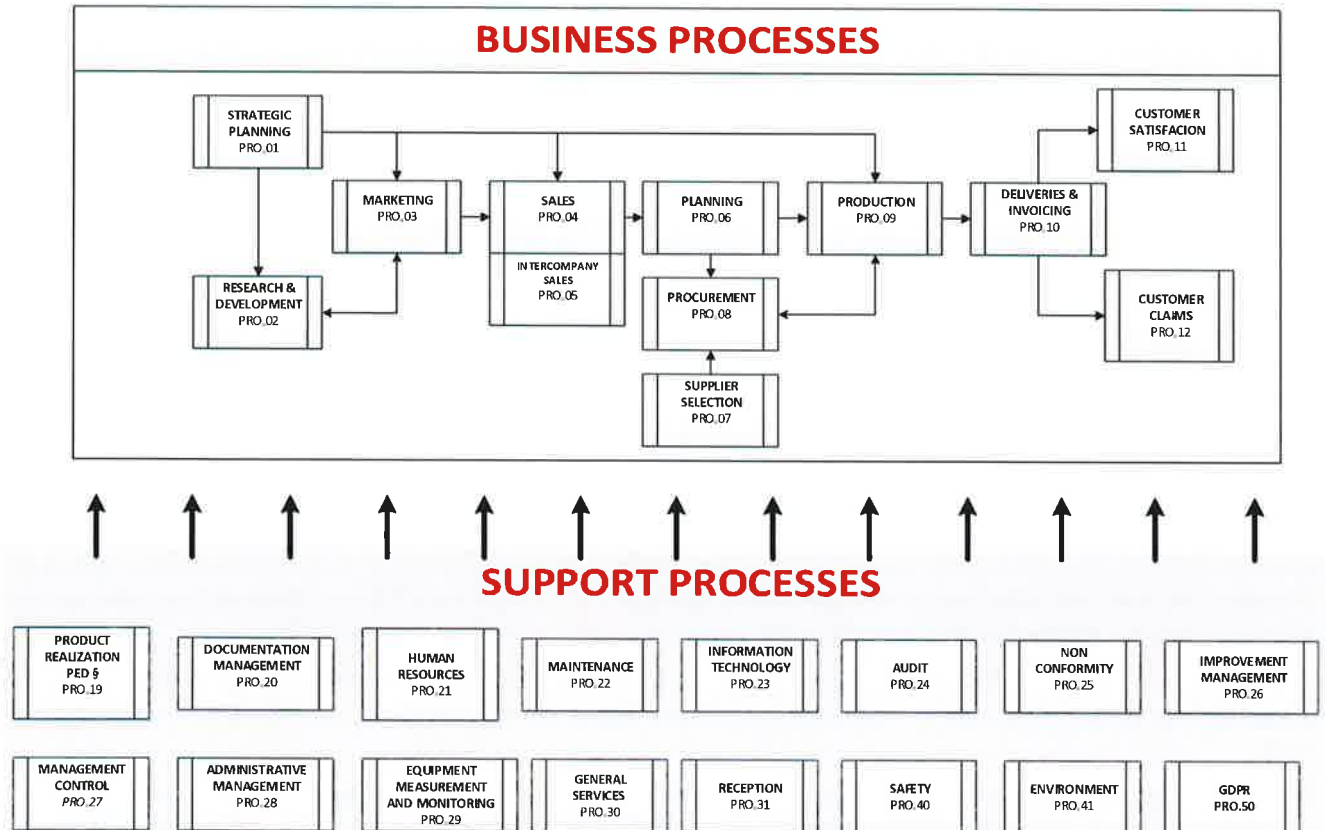
The Company, through its PED Manager, undertakes to keep ICIM Italia, as a PED Notified Body, informed of any changes to the system and / or products.

The Company is managed with 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.

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SYSTEM PROCESSES



Each 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 technical-commercial documents.

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

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The Holding has identified planned and implemented processes for measurement, monitoring, analysis and improvement to ensure that the processes and products within the Quality, Safety and Environmental management system 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, if necessary, 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 schema 8D and 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:

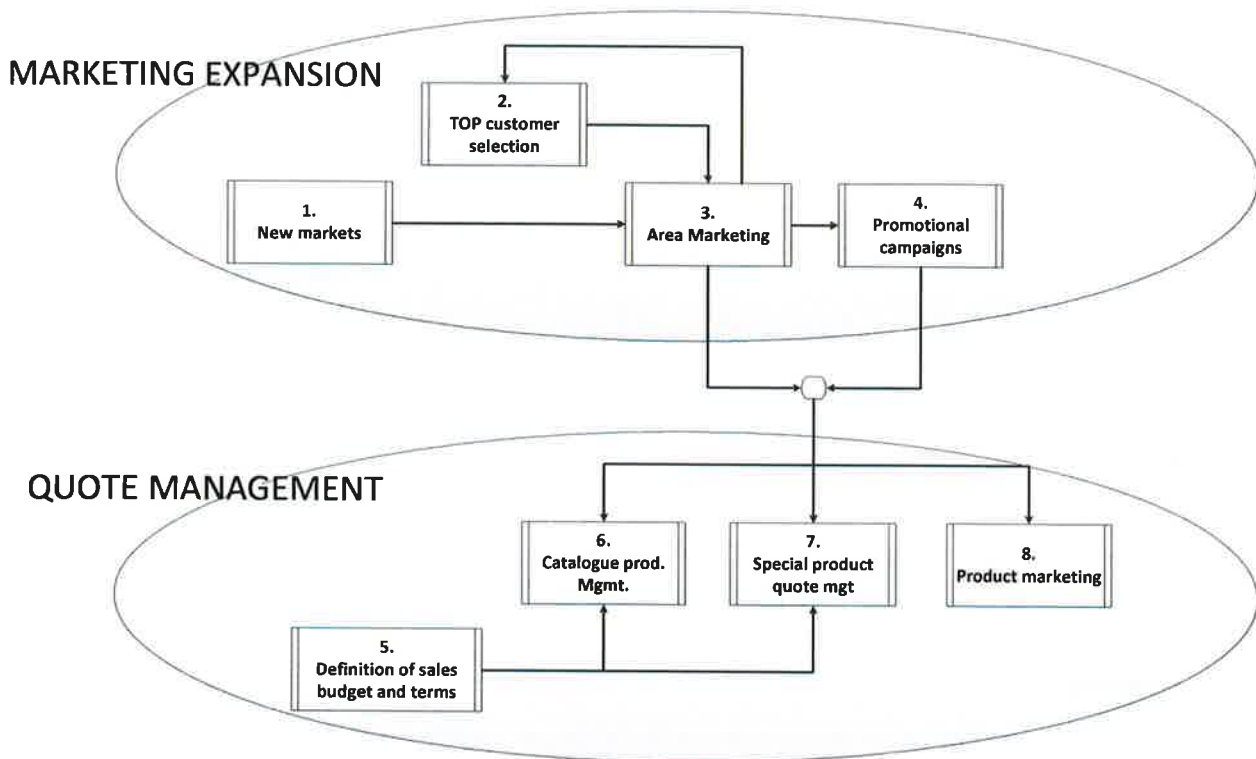
- TQ.5.01 Management Review
- PRO.04 Sales
- PRO.05 Intercompany Sales
- PRO.06 Engineering
- PRO.07 Supplier selection and evaluation.
- PRO.08 Procurement
- PRO.09 Production
- PRO.10 Shipping and Invoicing

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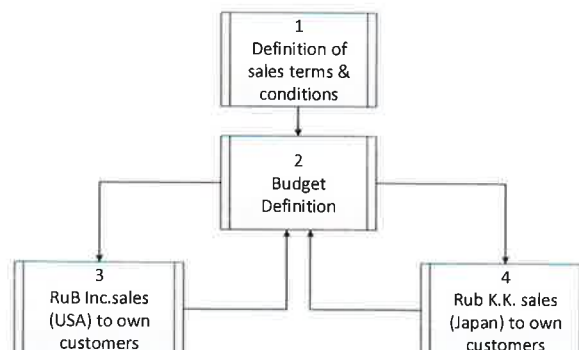
PRO.04 Sales - PRO.05 Intercompany sales

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 real-time exchange of information with production planning in Italy, which allows the execution of orders from our subsidiaries within the agreed delivery terms.



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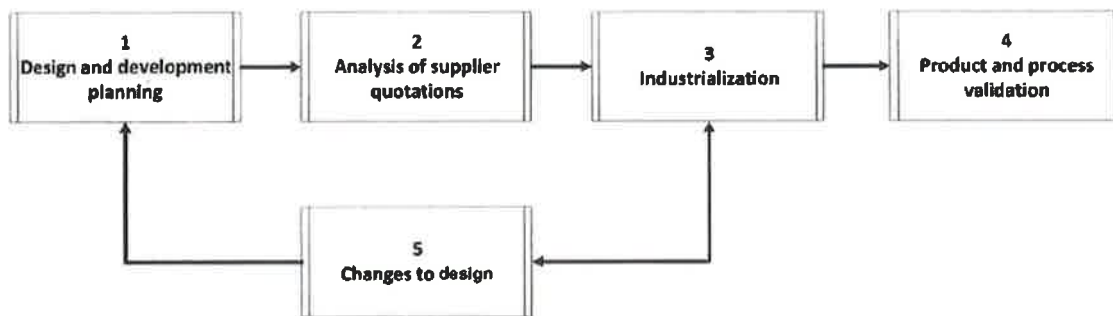
Both processes combine ideally to generate business profitability and promote **BONOMI INDUSTRIES** products to maintain a competitive edge on global markets.

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 and other applicable Directives.

It supports and provides the production process with the tools and information required to meet product specifications, forecast times and costs. It is connected with Procurement as it provides technical specifications necessary for orders to suppliers. Any problems or errors that may arise during production and the use of product are also identified in the development of the process in order to prevent them.

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 is structured into the phases of Procurement Request, Order Generation, and Material Receipt with the related quantitative and qualitative control (if applicable). The process ends with the recording and payment of the invoice to the supplier.

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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.

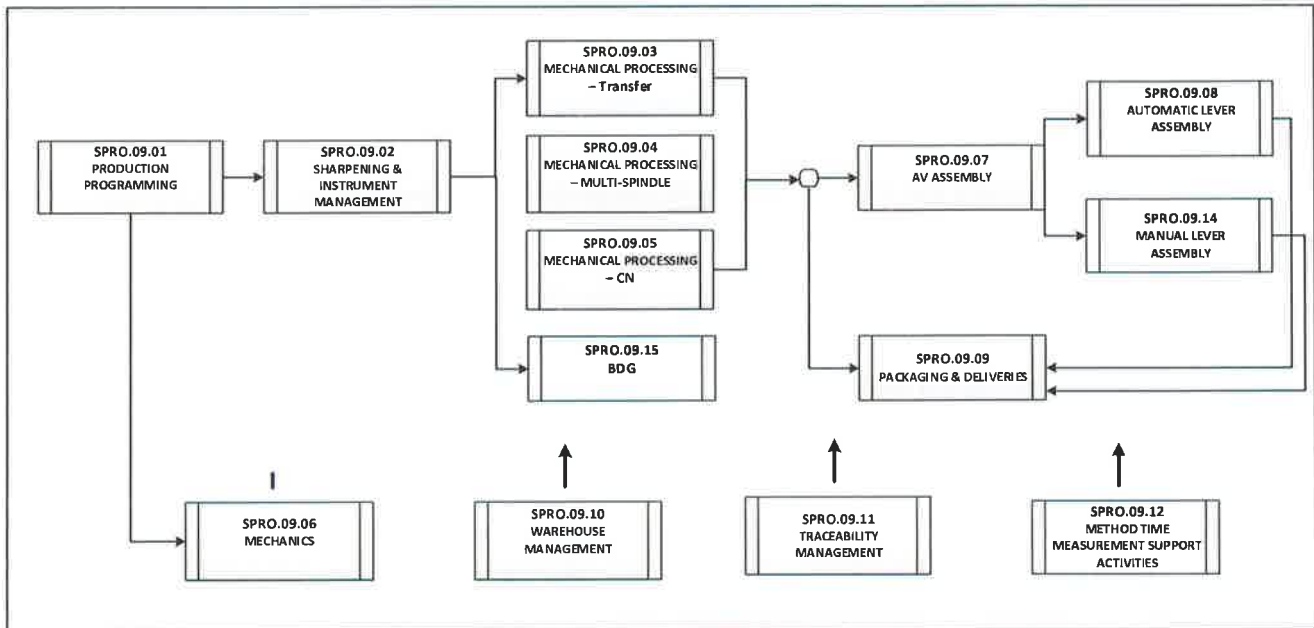
Production is divided into the following 14 sub-processes:

1. Production Planning
2. Tool Sharpening and Management
3. Transfer machining
4. Multi-spindle machining
5. NC machining
6. Mechanical engineering
7. Valve Assembly
8. Automatic Lever Assembly
9. Packaging
10. Warehouse Management
11. Traceability
12. Support activities
14. Manual lever assembly (consolidated now within subprocess7)
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.

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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.

From here, the Mechanical Machining processes for chip removal start in parallel in the 3 departments: Transfer, Multi-spindle, and CNC. Three types of machining are then launched on transfer, multi-spindle and CN machine tools.

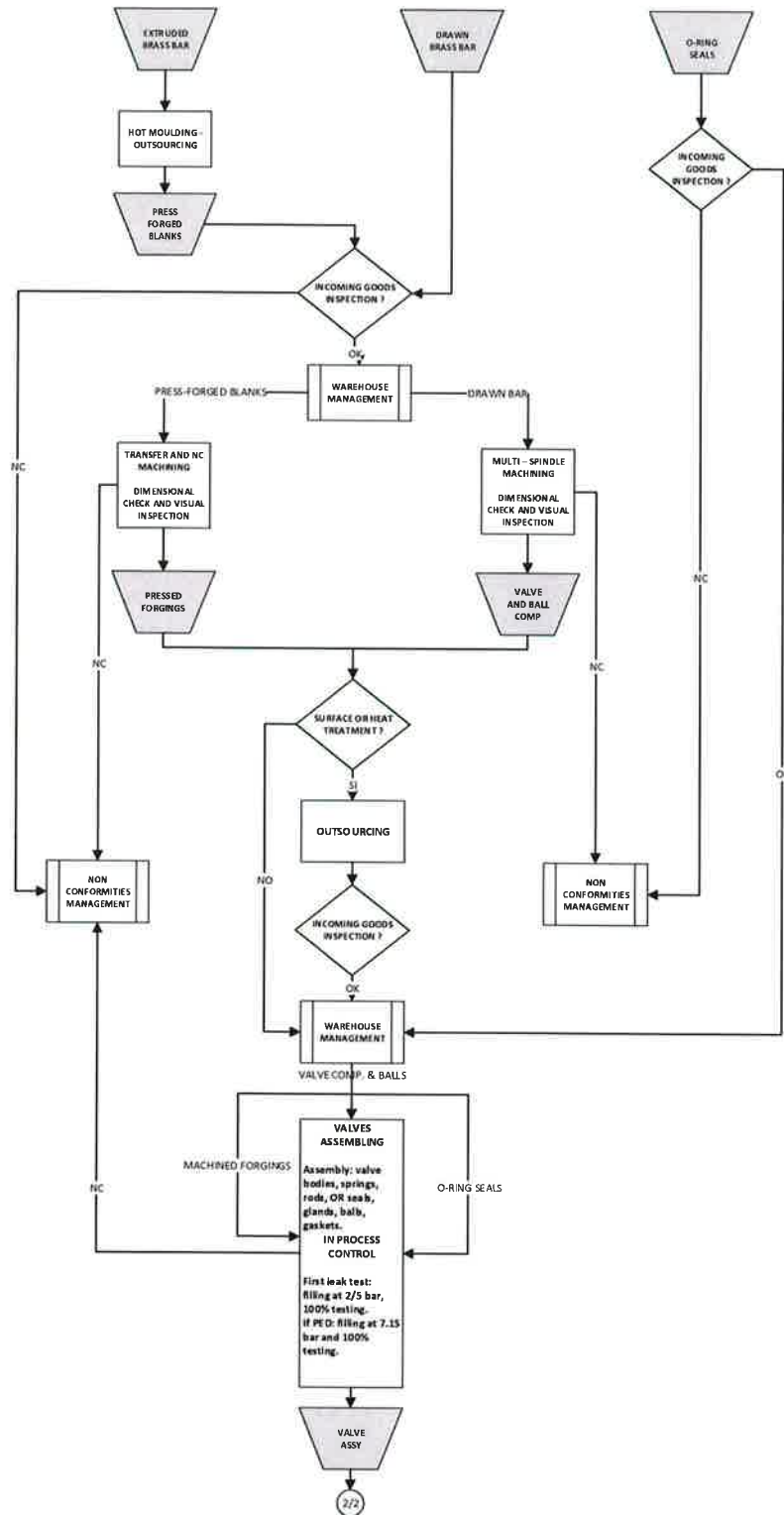
The resulting products can be conveyed directly to packaging or the valve and lever assembly bays, from where they are moved to the packaging department.

At every stage of production process, identification and traceability requirements are ensured:

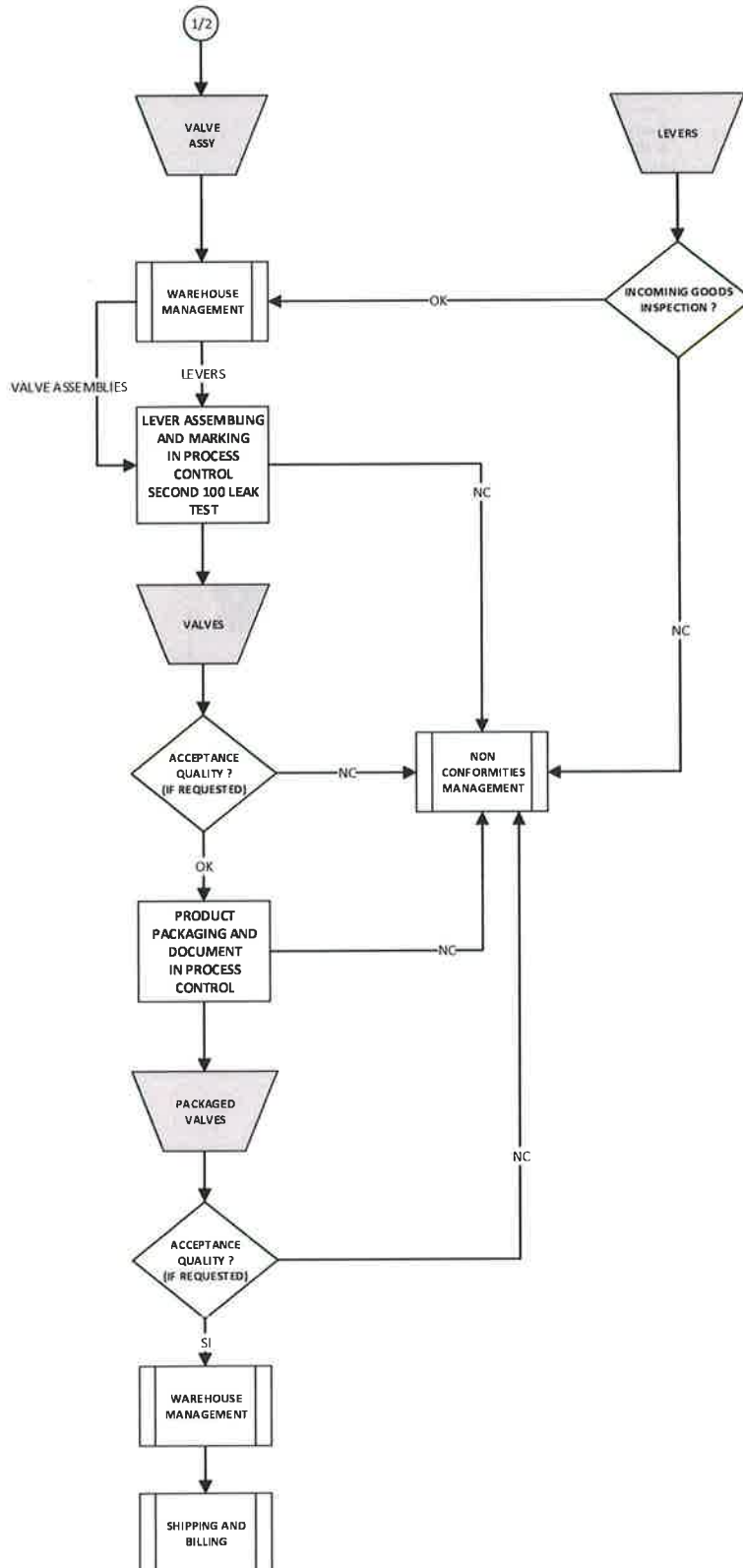
- The identification of all products and components from procurement of raw materials to shipment of finished products to the end customer is guaranteed by barcode labelling, which is processed by the SAP management system.
- Product traceability is a mandatory requirement of the pressure equipment directive (PED). It applies to valve bodies and end caps, which, once assembled, constitute the pressure vessel.
- It is guaranteed from the procurement of raw materials and blanks to the shipment of the finished product to the 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:

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The following raw materials undergo routine inbound inspection:

- Press-forgings obtained from extruded brass bar, processed externally, on account of transformation
- Drawn brass bar
- Purchased components, mainly gaskets, O-ring seals and handles.

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

Valve assemblies result from the assembly of machined prints with components such as spheres, gaskets, and O-rings. Standard valves originate from the assembly of handles onto valve assemblies.

All machining and assembling stages undergo self-inspection by operators. Additionally, final quality checks after packaging are provided, if required.

PRO.10 Shipping and Invoicing

The process begins with the assignment of shipping priorities, ordered by date and customer, based on the availability of ready and inspected items, along with the launch of picking missions.

It concludes with the issuance and sending of the invoice to the customer for the shipped goods.

The company adheres to the C-TPAT protocol by implementing measures to ensure the integrity and security of shipped goods and prevent tampering. To this end, the Shipping area is closed off.

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 and relaunched in 2022, resuming training and mentoring with the support of external specialist.

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.

As of today, almost all collaborators have participated in improvement projects, primarily focused on the application of 5S and PDCA. The basic tools include training and participation in typical Lean Production methodologies, such as 5S, SMED, and managing non-conformities through 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"

it is not just a slogan but constitutes the lived experience of key words: teamwork and a sense of responsibility, so that people truly feel like main actors in the company's success.

The Lean Production project is continuing from a technological standpoint through new production concepts with machinery installed exclusively in our company. This allows for the reduction of transit time in production from several days to a few minutes and the elimination of all traditional handling from the lever assembly operation to the loading bay on the truck.

The Organizational Well-being project has taken on the task of creating a flow of information, suggestions, and observations between collaborators and management through a periodic "Listening Center". The goal is to achieve greater harmony and shared understanding.

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