

Procedure:	Code of Ethics & Business Conduct
Version:	2.0
Date:	Jan 28, 2026

Table of Contents

1. Message from the CEO.....	2
2. Our Core Values.....	2
3. Anti-Corruption & Bribery.....	3
4. Conflict of Interest.....	3
5. Work Environment, Diversity & Mutual Respect.....	4
6. Human Rights & Labor Standards.....	4
7.0 Professional Excellence & Risk Management.....	5
8.0 Environmental Responsibility.....	5
9.0 Responsible Sourcing.....	6
10.0 Whistleblowing & Grievance Mechanism.....	6
APPENDIX: Employee Acknowledgement.....	7



1. Message from the CEO

Dear Team,

Holistic EHS is dedicated to serving as a strategic partner that bridges local regulations with the rigorous global standards of our clients. Our reputation is our most valuable asset. Leading global organizations entrust us with their most critical responsibilities: the safety of their workforce and their regulatory compliance.

This trust mandates a standard of behavior that allows for no compromise. The Code of Ethics presented here is not merely a list of requirements; it is the moral compass that guides our every decision - whether in the field, in the boardroom, or in our interactions with suppliers. I expect each of you to read, understand, and strictly adhere to these principles.

Sincerely, **Itzik Ben-Shlush** CEO & Founder

2. Our Core Values

Every action at Holistic EHS is grounded in two fundamental pillars:

- **Integrity:** We act with absolute honesty, even when no one is watching. We report truthfully and accurately, even if it means disclosing an uncomfortable truth to a client.
 - **Sanctity of Life:** We deal with human lives. No commercial consideration, schedule pressure, or budget constraint will ever justify compromising the safety or health of a person.
 - **Lead by Example:** As consultants, we are the authority on safety. We strictly adhere to the "**Lead by Example**" principle defined in our **PPE Procedure (OPS-002)**. We never cut corners; if the required safety gear is missing, we do not work.
-



3. Anti-Corruption & Bribery

We are committed to full compliance with all applicable anti-corruption laws in Israel and globally (including the FCPA and UK Bribery Act, which apply to many of our clients).

- **Prohibition of Bribery:** It is strictly prohibited to offer, give, solicit, or receive bribes, kickbacks, or unofficial payments ("backhanders") to facilitate business or influence professional decisions.
 - **Gifts & Hospitality:**
 - Giving or receiving gifts is permitted **only if done with full transparency**, is of nominal value, and is intended solely to foster proper business relations.
 - **The Golden Rule:** We always strictly adhere to the client's **Gift Policy**. If a client's policy prohibits gifts, we respect this without exception.
 - It is strictly prohibited to provide gifts to public officials or government regulators, except where specific written legal approval has been obtained in advance.
-

4. Conflict of Interest

As consultants, our loyalty lies with professional truth and our clients' best interests.

- **Vendor & Technology Recommendations:** We recommend solutions (e.g., safety equipment, VR systems, training) to clients based solely on professional suitability.
 1. If a personal or business relationship exists between a Holistic EHS consultant and a recommended vendor, full **Disclosure** must be made to the client prior to the recommendation. Transparency is the key to trust.
 - **Outside Employment:** We respect our employees' desire for professional growth. However, engaging in additional work outside of Holistic EHS requires:
 1. Prior approval from company management.
 2. Assurance that the additional work does not compete with Holistic EHS.
 3. Assurance that the work does not impair availability or the professional judgment required for your role at the company.
-

5. Work Environment, Diversity & Mutual Respect

We take pride in the human diversity that comprises our company and Israeli society.

- **Zero Tolerance for Violence:** We maintain a zero-tolerance policy regarding violence of any kind—physical, verbal, or psychological (bullying).
 - **Diversity & Inclusion:** We respect every individual regardless of religion, race, gender, sexual orientation, or political opinion. We expect employees to maintain professional and respectful discourse at client sites and to refrain from political or ideological arguments during work hours.
 - **Prevention of Harassment:** The company is committed to maintaining an environment free from harassment, including sexual harassment, in full compliance with the Prevention of Sexual Harassment Law.
-

6. Human Rights & Labor Standards

Aligned with the Responsible Business Alliance (RBA) Code of Conduct.

Holistic EHS is committed to upholding the human rights of all workers and treating them with dignity and respect. As a partner working within client facilities, we strictly adhere to the following standards:

6.1 Freely Chosen Employment

We strictly prohibit forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery, or trafficking of persons. All work is voluntary, and workers are free to leave work at any time or terminate their employment. We do not hold employee passports or identification documents.

6.2 Child Labor

Avoidance Child labor is not to be used in any stage of our operations. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

6.3 Freedom of Association



We respect the right of all employees to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly. Employees may openly communicate and share ideas with management regarding working conditions without fear of discrimination, reprisal, intimidation, or harassment.

6.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits.

7.0 Professional Excellence & Risk Management

Our value to clients lies in our professional rigor. We rely on data and systematic methodology, not on guesswork.

- **Standardized Methodology:** All risk assessments and safety consultations are conducted in strict accordance with our **Risk Assessment Methodology (OPS-001)**.
- **Compliance:** This ensures our deliverables align with ISO 45001 standards and provide consistent, high-quality results for our clients.

8.0 Environmental Responsibility

Holistic EHS is committed to minimizing our environmental footprint. We operate in full compliance with our detailed **EHS Policy (MGT-002)**.

- **Lifecycle Thinking:** As defined in our policy, we advise clients to consider the full lifecycle impact of their projects.
- **Resource Efficiency:** We practice what we preach by minimizing waste and energy consumption in our own offices.

9.0 Responsible Sourcing



As a Professional Services firm, Holistic EHS does not manufacture physical products. However, we are committed to responsible sourcing in our limited supply chain (office equipment, safety gear).

- **Conflict Minerals:** We support the goal of ending violence and human rights violations in the mining of certain minerals in conflict-affected areas (Tantalum, Tin, Tungsten, and Gold - 3TG). We do not knowingly procure products containing conflict minerals that finance armed groups.

10.0 Whistleblowing & Grievance Mechanism

The safety and ethical culture we implement for our clients begins at home. We encourage open communication and guarantee protection for those who speak up.

10.1 Reporting Channels If you encounter behavior that violates this Code, suspect criminal activity, or identify an unaddressed safety/human rights risk, you have a duty to report it via one of the following channels:

- **Direct Reporting:** Directly to the CEO (Itzik Ben-Shlush).
- **Anonymous Reporting:** Via the dedicated email ethics@holisticEHS.com (monitored by an external legal counsel/trustee) or the physical suggestion box located in the main office.

10.2 Availability This grievance mechanism is available to all employees, temporary workers, and **external stakeholders** (including suppliers and business partners) who wish to report concerns regarding Holistic EHS operations.

10.3 Protection Against Retaliation Holistic EHS maintains a strict **Non-Retaliation Policy**. We commit to investigating every complaint seriously and discreetly. No punitive, discriminatory, or retaliatory action will be taken against any person who reports a suspicion in good faith, even if the report turns out to be unfounded.



APPENDIX: Employee Acknowledgement

I, the undersigned, acknowledge that I have read the Holistic EHS Code of Ethics & Business Conduct (v1.3). I understand the values and rules detailed herein—including Human Rights, Safety Protocols (OPS-001/002), and Ethics—and adhere to them as part of my employment.

Full Name: _____ **Date:** _____ **Signature:** _____