

# Supplier Code of Conduct and Compliance Declaration

Novar's code of conduct is firmly rooted in internationally recognized standards\*. This comprehensive foundation ensures that our business practices align with our commitment to responsible and sustainable business practices. We prioritize tackling climate change, preserving biodiversity and ecosystems, and ensuring the provision of affordable energy. Additionally, we uphold rigorous occupational health & safety standards, foster employee wellbeing, champion diversity & inclusion, promote ethical business conduct, and aspire supply chain transparency.

## 1. Purpose of the Procedure

Novar's supplier code of conduct outlines the minimum requirements that our suppliers must meet regarding fairtrade practices and ethics, labor practices, environmental impact, and safety and health outcomes.

## 2. Scope

All suppliers of Novar.

## 3. Key Principles of Novar's Supplier Code of Conduct

### 1.1. Fair Trade Practices and Ethics

Every Novar supplier adheres to the highest standards of fair trade practices and ethics, including:

#### 1.1.1. Corporate Integrity

Suppliers do not engage in any form of corruption, extortion, embezzlement, or bribery. They comply with all applicable anti-corruption laws and regulations in the countries where they operate and with all relevant international anti-corruption treaties. Suppliers commit to fair and impartial competition, adherence to international trade regulations, and compliance with export control regulations.

Suppliers avoid situations of conflict of interest with Novar employees. They maintain the highest level of integrity, including refraining from offering excessive gifts, dinners, entertainment, travel, accommodation, to Novar employees.

Novar does not support suppliers in evading taxes and does not allow their owners or employees to benefit from pricing agreements that are not in line with ethical trading practices and comply with tax and other legal requirements.

\*Based on the Universal Declaration of Human Rights (UNDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) labor standards, the Organization for Economic Cooperation and Development (OECD) guidelines, and pertinent laws related to environmental protection.

#### 1.1.2. Protection of Intellectual Property

All Novar suppliers respect intellectual property rights and handle technology and knowledge information in a way that adequately protects Novar's intellectual property rights.

The brand name and logo of Novar are also examples of intellectual property rights. Suppliers are not allowed to use the Novar logo or publish Novar as a reference customer in their online or printed communication materials without prior written permission from Novar. Such requests can be sent to [marketing@novar.nl](mailto:marketing@novar.nl). Novar reserves the right to revoke any approval granted if the relationship with the supplier is terminated.

#### 1.1.3. Confidentiality and Disclosure of Information and Data Privacy

Novar suppliers treat information obtained from Novar as strictly confidential. Information about the business activities, structure, financial situation, and results of the suppliers is disclosed in accordance with applicable (mandatory) laws and regulations.

False data or artificial information and practices by our suppliers are unacceptable.

Suppliers will also respect the general right to privacy of all individuals and the confidentiality of personal data. Suppliers adhere to all applicable laws and regulations regarding the acquisition, use, and publication of personal data.

#### 1.1.4. Responsible Origin of Minerals

Novar commits to using raw materials from legal and sustainable sources, avoiding the procurement of 'conflict materials' contributing to armed conflicts and human rights abuses. Suppliers are expected to fully support Novar in this commitment.

#### 1.1.5. Security

All Novar suppliers conduct their business operations securely and implement reasonable measures to minimize exposure to information security threats.

### 1.2. Labor Practices

#### 1.2.1. Child and Forced Labor

No form of forced labor is accepted. Child labor is not allowed. The minimum age for employment is the age at which compulsory education ends, in accordance with applicable laws, but never younger than 15 years. Employees shall not perform work that could jeopardize their health or safety.

#### 1.2.2. Compliance with the Law

Novar suppliers support the 'Universal Declaration of Human Rights' by the United Nations and the treaties and recommendations of the International Labour Organization.

Suppliers commit to complying with the legislation and collective labor agreements in the countries where they operate.

#### 1.2.3. Freedom to Form Trade Unions and the Right to Collective Bargaining

Novar suppliers recognize their employees' right to participate or not participate in trade unions and collective bargaining.

#### 1.2.4. Non-Discrimination

Suppliers acknowledge and value the existence of different values and cultural norms. Each supplier commits to offering fair employment opportunities and refrains from engaging in discrimination based on factors such as age, race, nationality, social or ethnic background, gender, physical disabilities, sexual orientation, religion, political affiliation, or union membership, among others.

#### 1.2.5. Fair Working Conditions, Contracts, Wages, and Working Hours

A Novar supplier commits to complying with all applicable international, national, and local laws, regulations, and/or collective labor agreements related to wages, benefits, working hours, and working conditions.

### 1.3. Environmental Care

Novar expects its suppliers to comply with all applicable environmental laws and regulations. Suppliers commit to developing cleaner processes, minimizing environmental impact, and following best practices in environmental management, including efficient use of energy and natural resources, limiting CO2 emissions and other greenhouse gas emissions, responsible water management, and treating, reducing, and recycling waste.

### 1.4. Health and Safety

Novar aims to work with suppliers providing a safe and healthy workplace for all employees. Novar suppliers commit to working safely and strive towards a goal of zero incidents. Suppliers provide necessary training and personal protective equipment to their employees.

Suppliers with access to Novar's premises for agreed services must acknowledge and comply with Novar's safety and health guidelines for visitors and external contractors.

### 1.5. Suppliers

Novar expects its suppliers to implement a supplier code of conduct in their supply chains. The principles described in this code must be at least consistent

with Novar's supplier code of conduct principles. The supplier code of conduct and related practices must comply with relevant laws and regulations.

#### 1.6. Documentation and Monitoring

To ensure compliance with the supplier code of conduct and provide evidence, suppliers must document all relevant information and provide supporting documentation upon request. This code is an integral part of Novar's procedure for managing and evaluating relationships with suppliers. Novar uses a risk-based approach to assess supplier compliance, which may include self-assessment, site visits, and follow-ups in case of improvement plans. Novar collaborates with suppliers in addressing identified deficiencies.

### 4. Corrective Measures

Suppliers are expected to demonstrate that they have complied with this Code upon request by Novar. Novar reserves the right to monitor compliance with this Code, including on-site visits and inspections by Novar personnel or designees representatives.

If a supplier fails to comply with any aspect of the Novar Code of Conduct for Suppliers, the violation must be reported immediately to Novar. The Supplier must then take immediate corrective action to correct violations of the Code. Novar reserves the right to terminate an agreement with a Supplier if it does not comply with the Code.

### 5. Compliance Declaration

Choose **one** of the following three options:

- I hereby declare that I have received and understood the Novar Code of Conduct for Suppliers, and commit to adhering to its provisions.
- I hereby declare that my organization has an (internal) **code of conduct** whose principles align with those described in Novar's supplier code of conduct. I am attaching a copy of my own (internal) code of conduct.
- I hereby declare that I am unable to comply with the principles stated in Novar's supplier code of conduct at this time. However, I take full responsibility for adhering to these principles by developing **corrective measures** and presenting them to Novar.

Choose **one** of the following two options:

- I hereby declare that I have developed and implemented a supplier code of conduct for my own suppliers in the upstream supply chain. I am providing a copy of my **own supplier code of conduct**.
- I hereby declare that I have not yet developed and implemented a supplier code of conduct for my own suppliers in the upstream supply chain.

Company name and/or supplier's stamp:

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Function of authorized signatory:

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Name of authorized signatory:

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Signature of authorized signatory:

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Date:

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