

Novasol Chemicals

Code of Conduct

V3.2023



Code of Conduct for all Stakeholders*

* A stakeholder is a person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity from our organization.

Novasol Chemicals Group has an engagement towards the subject of sustainability as we are convinced that sustainability will be one of the major factors in the long-term relationship between all stakeholders, from supplier to customer, between people and nature.

We support measures designed to spare the environment, protect Human Rights, maintain fair working conditions, and combat corruption worldwide.

Novasol Chemicals is fully committed to the values and principles of the United Nations Global Compact. We incorporate them into our strategies, policies and procedures.

Human rights and labour standards

Novasol Chemicals requires its Stakeholders to protect the rights of their employees and to comply with all relevant national regulations and laws regarding employment and industrial relations. In particular, Novasol requires that its Stakeholders agree to the following :

- **Fair working conditions**

Novasol requires its Stakeholders to give employees a safe working environment including the right to reasonable working hours, to rest and recuperation and providing them with fair compensation and benefits.

- **Freedom of association and collective bargaining**

Novasol requires its Stakeholders to respect the rights of employees to freely associate and bargain collectively, or refrain from doing so, in accordance with applicable national laws.

- **Child labor and forced labor**

Novasol Stakeholders shall demonstrate a zero tolerance for child, forced, bonded or involuntary prison labor.

- **Discrimination**

Novasol shall not tolerate any form of discrimination from its Stakeholders based on personal characteristics such as national origin, gender, color, race, nationality, sexual orientation, age, religion, political opinions, or against qualified individuals with disabilities.

- **Health and safety**

Novasol requires its Stakeholders to comply with all applicable international standards, national regulations, and laws to ensure a safe and healthy workplace for its employees in order to prevent the risks of accidents or occupational diseases.

- **Harassment**

Novasol requires its Stakeholders to treat all employees with dignity and respect and to protect them from harassment, intimidation and violence in whatever form at the workplace.

Environment

Novasol Chemicals embraces the principles of the Responsible Care program towards responsible management of products and activities with respect for sustainable progress. Novasol requires its Stakeholders to comply with these principles and in particular with the following:

- **Respect for the environment**

Stakeholders shall comply with the applicable international standards and national regulations and laws regarding the protection of the environment. Novasol requires its Stakeholders to undertake initiatives to prevent, assess, mitigate and avoid the risks and impacts of their business activities on the environment. Accordingly, Stakeholders shall have an effective and appropriate environmental management policy.

- **Quality and Safety of products and services**

Stakeholders shall ensure that the products and services they supply comply with all applicable quality and safety standards. No substance prohibited by the relevant laws and/or regulations in the countries where they operate and/or which present an unacceptable level of risk for human health or the environment must be included in their products and/or services. They must also ensure that the information necessary for the safe handling and use of their products is available. Special attention must be paid to hazardous materials. In this case, product safety must be evaluated in a risk assessment process.

- **Plant and process safety**

We expect our Stakeholders to ensure that the design and the operation of production plants and manufacturing processes are safe for their employees, the public and the surrounding communities. Risk assessments must be carried out for all production facilities. Processes that may lead to serious incidents must be identified, and their hazards and risks must be thoroughly analyzed. Adequate corrective actions must be taken to minimize identified risks. This also includes the transportation of materials, which must be conducted in a manner that is safe for human health and the environment.

Business ethics and transparency

Novasol considers business ethics and transparency as being of the highest importance and as such, requires its Stakeholders to comply with the following principles:

- **Competition law**

Stakeholders shall perform their business activities in accordance with the relevant competition laws and regulations in the countries where they operate.

- **Anti-corruption**

We expect our Stakeholders to be honest in their dealings with others, obeying all applicable laws and corresponding regulations governing fraud, bribery and corruption. Our Stakeholders should be committed to the principles of fair competition and must comply with the antitrust and fair competition laws of the countries in which they conduct business.

- **Conflict of interest**

Stakeholders are required to prevent and avoid any situation that may create a conflict of interest. They shall disclose to Novasol any conflict between a personal interest of one of their employees and the interests of Novasol.

- **Gifts and hospitality**

Stakeholders are prohibited from offering to any Novasol employees any gift or invitation of more than modest value and that may influence any decision made by Novasol employees within the context of their business relationship.

- **Trade sanctions**

Stakeholders shall comply with international trade law and especially with trade sanctions imposed by international institutions or governments.

Business Ethics and Transparency

- **Confidentiality**

Stakeholders shall protect confidential information transmitted by Novasol. Accordingly, they shall not use or disclose said information to third parties outside of the contractual framework set out with Novasol.

- **Transparency and honesty**

Stakeholders shall communicate clear, correct and truthful information to their stakeholders and to Novasol within the context of their business relationship with Novasol.

Violations of the Code

HOW TO REPORT A CONCERN OR ASK A QUESTION?

If any stakeholder of the Novasol Chemicals Group has a question regarding an act related to this code or believes that someone or any kind of practice of the Group or of our business partners is violating this code or any related laws or regulations, they are required to report it immediately to the local General manager or the CEO of the Novasol Chemicals Group.

In order for investigations to be successful, complaints should be as specific as possible. To the extent possible, they should include details such as:

- The type of alleged wrongdoing
- When, where and how the wrongdoing occurred and
- Who was involved and may have knowledge of the matters being reported.

Relevant documents or other evidence should be included with the report or provided as soon as possible. However, the absence of any of the above details does not prevent investigation of allegations of fraud or corruption.

The Board of Novasol Chemicals is responsible for ensuring adherence to these commitments and our top management has responsibility for overseeing their implementation and ensuring that any breaches of this Policy or any of its related policies and procedures are investigated.

Note: This “Code of Conduct” represents fundamental principles to which Novasol is committed. This document shall however not be misinterpreted as providing an independent basis for assertion of contractual rights against Novasol.