

# Novares Supplier Code of Conduct

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Revision 01

## **Foreword**

At NOVARES, we believe that Sustainability is a key element to ensure our future development and to maintain attractiveness with respect to our Customers, Employees and Shareholders.

How we integrate in our environment, support our employees and conduct our business are our drivers to operate and represent a factor of competitiveness.

Consequently, our aim is to have all our suppliers, service providers and sub-contractors (hereafter the "Supplier(s)") involved in the same continuous improvement approach.

In fact, the selection of Suppliers is based not only on the quality and competitiveness of their products and services, but also on their adherence to environmental, social and governance (ESG) principles. Agreeing to the Supplier Code of Conduct is a prerequisite to becoming or continuing to be a Supplier of NOVARES and building a successful business relationship.

The objective of this Code of Conduct is to express the expectations of Novares Group and its subsidiaries ("NOVARES") with regard to its Suppliers (current or potential) in terms of ESG commitments.

This Code of Conduct applies to all Suppliers of NOVARES and shall be a part of the documentation issued by NOVARES in support of its consultations. It is also intended to be included in contractual documents.

By acceding to this Code of Conduct, Suppliers shall undertake to comply with and implement as well as have all the principles set forth therein complied with and implemented by its own suppliers, service providers and sub-contractors, in compliance with contractual provisions and applicable national legislations.

In addition, Suppliers shall undertake to setup within their organizations the rules and procedures required for compliance with the commitments referred to in this Code of Conduct and to make regular assessments.

The commitments defined herein may not be interpreted in a manner that would modify those taken by Suppliers in their commercial agreements concluded with NOVARES.

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## **1. Regulatory compliance**

Suppliers must respect all laws and regulations applicable in the countries where they conduct their activities.

Furthermore, they specifically commit to comply with:

- The Universal Declaration of Human Rights of the United Nations and its two complementary covenants (the international covenant relating to economic, social and cultural rights and the international covenant relating to civil and political rights)
- The United Nation Guiding Principles on Business and Human Rights and the ten principles of the United Nations Global Compact
- The Fundamental Conventions of the International Labor Organization (ILO) as well as the ILO Declaration relating to the fundamental principles and rights at work
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

As well as any other international, national or local regulation, in addition to the applicable contractual provisions.

NOVARES takes also the 2030 United Nations Sustainable Development Goals as a framework for its action towards a more sustainable future.

Novares expects its Suppliers to act in accordance with principles of these Conventions even in countries which have not ratified them.

## **2. Business ethics**

NOVARES expects its Suppliers to maintain the highest standards of corporate ethics and lawful conduct. They shall endeavor to conduct their activities in accordance with the principles of loyalty, integrity and equity, both internally and throughout their supply chains. They should also conduct due diligence on their direct suppliers and contractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promote transparency and traceability, allow the work of inspection when requested.

NOVARES encourages its Suppliers to implement a formal management system to control operations and continuously improve practices on general ESG performance, including business ethics, labor practices, environment and responsible sourcing, as well as to use their best efforts to implement ESG standards along their own supply chain.

### Respect of competition law

- Suppliers undertake, on behalf of all its employees, representatives and affiliates, to conduct their activities in compliance with laws on competition (including not but restricted to antitrust, trade practice, unfair competition or restraints of trade) and to take any precautionary measures to avoid any anti-competitive practices or conduct.
- Suppliers shall not participate in cartels fixing prices, agreements on quotas, production or sales and, more generally, any unfair practices which impede free competition, in particular those intending to oust a competitor from the market or restrict access by new competitors to markets by unlawful means.

### Prohibited practices

- Suppliers will abstain from conducting, directly or indirectly, any form of torture, cruel, inhuman or degrading treatment practices, war crimes, crimes against humanity, support of non-state armed groups in any activity related to the supply of goods or services to NOVARES, including but not limited to the extraction, transportation, distribution and sale of minerals, or other serious violations of international law.

### Corruption and money laundering

- Suppliers undertake, on behalf of all their employees, proxies, representatives, affiliates and any person who renders services in their name, to conduct their activities in strict compliance with the laws and regulations which aim to fight against corruption and money laundering, in all the countries in which they are registered as a company or established and in which they conduct their activities.
- Suppliers undertake in particular not to solicit or accept, for themselves or for their relatives, or propose or offer to any associates at NOVARES and any individuals or legal entities with whom they have business relations, any gift, reward, benefit in kind or in expenditure, that would be of a nature to influence business relations.
- Suppliers undertake to operate transparently and in particular shall ensure that their books, registers and all accounts accurately reflect all payments concerning their transactions.
- Suppliers shall ensure that any sub-contractor or other person affiliated therein, in the context of the performance of their contractual obligations with NOVARES, works on the basis of a written contract, which sets or guarantees the same level of commitment with regard to the fight against corruption and money laundering.
- Suppliers undertake to establish and implement policies and procedures for the fight against corruption, bribery, extortion, embezzlement and money laundering. They shall control compliance by all their employees and proxies, as well as any individuals or legal entities with

### Conflict of interest

- Suppliers are in a conflict of interest due to a personal connection between him and the people involved in the purchasing process or likely to influence the business relationships with NOVARES. When confronted with a risk of a potential or recognized conflict of interest, Suppliers undertake to inform NOVARES without delay.
- Suppliers should make decisions based on objective criteria and should not obtain profit, directly or indirectly, as a result of competing interest that interferes with the ability of NOVARES to make an objective business decision.
- No Supplier employee may directly or indirectly obtain profit as a result of the awarding of a contract. Consequently, any benefit or gift accepted or received which is meant to influence an independent decision or the behavior of any of the parties involved may lead into a Due Diligence and have severe consequences.

### Information security, Privacy and Confidentiality

- Supplier undertakes to comply with the regulations in force concerning the collection and use of personal data, data protection and information security. No use and treatment other than those provided for in the contracts and applicable laws and regulations may be implemented by the Supplier.
- Suppliers shall ensure that any confidential business information or trade secrets obtained under business activities with NOVARES are held in strict confidence and not improperly used or revealed to third parties.
- Supplier should implement a formal management system to prevent, control and manage potential information security breaches. Suppliers should never directly or indirectly disclose non-public information acquired while conducting business with NOVARES.

### Media inquiries

To ensure that NOVARES speaks with one voice and provides accurate information regarding its business, if Suppliers receive an inquiry related to NOVARES from a journalist or media representatives, Suppliers must direct all such inquiries to NOVARES' Communication Department. Suppliers are not permitted to discuss matters involving NOVARES with any reporters or other media representatives without the express written consent of NOVARES' Communication Department. NOVARES Suppliers are not allowed to disclose proprietary information about the company and their relationship with the company on social media or in press releases without approval from NOVARES Communication Department.

### Financial and Non-Financial Responsibility, Accurate Records

- Suppliers should disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices. All records and reports, whether internal or external, must be accurate and truthful. NOVARES and its Suppliers are expected to act in accordance with applicable law and generally applicable accounting Principles, which require that data and other records always be complete, correct, up-to-date, and System-compliant.
- Suppliers should avoid any form of economic action, aid or mediation that provides financial or any other type of support to activities of terrorist groups or elements and other activities considered controversial by NOVARES.

### Fair trade practices

- Suppliers will prohibit any activity that facilitates the production or trade of counterfeit products or components throughout its supply chain and will cooperate with NOVARES in any

investigation related to suspected counterfeit activity.

- Suppliers will apply appropriate protections for the confidential information it receives from NOVARES, consistently with non-disclosure agreements, terms and conditions or contractual requirements that NOVARES may require for that purpose. Supplier will also respect the intellectual property rights of other parties.

### Import/Export Controls and Economic Sanctions

- Suppliers shall ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import / export of parts, components and technical data.
- Suppliers shall provide truthful and accurate information for reporting purposes when requested and obtain import and/or export licenses and/or consents where necessary.
- Suppliers shall comply with applicable restrictions on the export or import of goods, equipment/tools, software, services and technology, as well as with all applicable economic sanctions and restrictions on doing business with and trade involving certain countries, regions, companies or entities and individuals.

### Responsible materials & minerals management

- Suppliers shall not provide products containing materials that contribute to human rights abuses, bribery, violation of ethics or negatively impact the environment.
- Suppliers commit to use minerals from responsible sources in reference to the established framework of the Organization of Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. They are expected to conduct this due diligence on their own supply chain.

To ensure compliance with the Dodd-Frank Act and the EU regulation on Conflict Minerals, NOVARES requests information regarding the use of conflict minerals from its suppliers, which, in turn, must solicit that information from the next tier of suppliers, continuing down the supply chain. Suppliers that provide production, service, and aftermarket parts to NOVARES should ensure reporting and traceability using the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT) by the Responsible Minerals Initiative (RMI) (\*)

*(\*) The term "conflict minerals" refers to columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin, tungsten, and any other mineral or its derivatives determined by the U.S. Secretary of State. The term "extended minerals" is defined as Cobalt and Mica. See <https://www.responsiblemineralsinitiative.org/> for additional details.*

- In particular, Suppliers shall use validated conflict free smelters and refiners for procurement of Tin, Tungsten, Tantalum and Gold contained in their products.

### Chemical Products Management

- Suppliers must ensure that all substances contained in components or raw materials delivered to NOVARES are compliant with the Global Automotive Declarable Substance List (GADSL). More specifically, they must comply with all laws and specifications concerning hazardous materials, chemicals, and substances that apply to the business location and/or the market in question (e.g., European Regulation (EC) No. 1907/2006 (REACH)). In addition to these legal requirements, NOVARES requests from Suppliers full compliance with its own Customer Specific Requirements and associated technical specifications if necessary, depending on the project and the final customer.
- Suppliers shall disclose all materials, minerals and substances contained in their products delivered to Novares in the International Material Data System (IMDS) online database and archiving system. They are responsible for obtaining an IMDS ID for each component or material supplied to NOVARES. This IMDS ID must be also submitted and approved by NOVARES.

### Whistle blower Protection and Non-Retaliation

- Suppliers should immediately form and report through the NOVARES whistleblowing line in case they have evidence, doubts or suspicions regarding any form of corruption, or other criminal or non-compliant conduct.
- NOVARES will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Code. Suppliers commit to neither tolerate nor contribute to threats, intimidation, or attacks against human rights defenders in relation to their operations to create safe and enabling environments for civic engagement and human rights at local, national, or international levels.



### **3. Human Rights and working conditions**

Suppliers undertake to respect fundamental rights relating to working conditions in all countries in which they operate, including in geographical areas where human rights may not yet be sufficiently protected in particular, with regard to:

- recourse to any form of forced or compulsory labor in all its forms
- use of child labor
- discrimination in terms of employment and working conditions
- equal pay
- trade-union freedom and the protection of union rights in compliance with the fundamental conventions of the International Labor Organization.

Suppliers shall undertake not to have recourse to illegal work such as defined by the rules of the countries in which they are involved.

Suppliers undertake to be up-to-date with declarative obligations required by social protection bodies and the tax administration, and to pay the duties and contributions due in this regard.

Suppliers undertake to respect local legislation with regard to the minimum wage, pay a regular salary and pay overtime due to employees at the legal rate stipulated by the host country. They also undertake to ensure their employees benefit from applicable legal benefits.

Suppliers undertake to respect local legislation with regard to working time.

#### Child labor

- Suppliers shall not allow any form of child labor in their business activities and in their supply chain. The minimum age for employment must comply with local regulations and may not be less than 16 years.
- Suppliers must ensure that their employees and all personnel supplied by staffing agencies or any other third-party work in full compliance with international and local child labor laws and regulations. Compliance must be demonstrated through implementation of policies, procedures, appropriate training to Human Resources and Management.
- Suppliers must ensure that minors, as defined by local law, shall not perform activities that would put their safety, physical and mental health, at risk.

#### Forced labor, modern slavery or human trafficking.

- Suppliers shall not resort to any form of forced, bonded or compulsory labor, including human trafficking.
- Suppliers should implement all appropriate policies, and control systems procedures as well as the appropriate awareness and training to its personnel to address forced labor, modern slavery and human trafficking and ensure legal compliance.
- Suppliers acknowledge the ILO 11 indicators of forced labor and represent that none of such indicators shall be present within their supply chain.
- Suppliers shall ensure that migrant workers are treated fairly and their rights are respected.

#### Ethical Recruiting

- Suppliers shall establish ethics, integrity and transparency in the recruitment, promotion and selection processes in accordance with international, regional and national legislation.
- Suppliers shall ensure that workers understand their rights. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood

by them, stating in a truthful, clear manner their rights and responsibilities.

- Suppliers shall not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents.
- Suppliers shall pay particular attention in case workers are recruited by third parties, that they have not been charged any fees or commissions related to the recruitment and/or employment process.

### Working Hours

- Suppliers shall comply with applicable laws & regulations, collective bargaining agreements and international conventions, in relation to working hours (including overtime), as well as break times and periodic days off.
- Suppliers shall comply with the ILO Standards on Working Time, in the absence of relevant local regulations.

### Fair Wages and Equal Remuneration (Payment)

- Suppliers shall comply with applicable regulations in all relevant territories and industries in terms of salary and legally mandated benefits for their Employees and contract workers, including a minimum living wage and promoting wage equality in the workplace.

### Women's Rights

- Suppliers shall provide equal opportunity, specifically for the women, in employment and commit to equal pay for equal work.

### Freedom of Association and Collective Bargaining

- Suppliers shall allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.
- Suppliers shall respect the right of workers to associate freely, form, join and not to join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations and consistent with the spirit underlying the ILO recommendations (ILO Convention 87)
- Suppliers shall ensure that representatives of such personnel are not subject to discrimination, fear of reprisal, intimidation or harassment.

### Diversity, Equity, and Inclusion

- Suppliers shall develop and promote inclusive cultures where everyone is able to contribute fully and reach their full potential.
- Suppliers shall encourage diversity in all levels of their workforce and leadership, including boards of directors.
- Suppliers are expected to have a diversity program in place or other actions designed to advance diversity in their supply chain globally.

- Suppliers shall not discriminate against any worker under any circumstance.
- Suppliers shall guarantee equal treatment and provide an inclusive working environment to all of their Employees.
- Suppliers shall ensure that there is no distinction, exclusion, restriction or preference, according to characteristics of an Employee such as race, color, national origin, gender, age, physical characteristics, social and cultural origin, disability, union membership, religion, affiliation, union association or any unlawful criterion under applicable law.
- Suppliers shall provide a workplace free of any form of harassment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of employees.

#### Rights of Minorities, indigenous Peoples and vulnerable groups

- Suppliers shall respect the rights of minorities, local communities and indigenous people to the right to Free, Prior and informed Consent (FPIC) to developments if affected them and the lands, with particular consideration for the presence of vulnerable groups.

#### Land Rights and Forced Eviction

- Suppliers should avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

#### Private or Public Security Forces

- Suppliers shall not commission or use private or public security forces to protect the business in a way that may result in human rights violations due to lack of training or control by the company.

#### **4. Health and safety**

Suppliers should create and maintain a healthy and safe working environment to ensure the avoidance of any risk of accident or occupational illness of its employees, sub- contractors, other persons in the vicinity and users of its products and to comply with applicable legal requirements and industry standards with the goal of zero workplace safety incidents.

NOVARES recommends its Suppliers to obtain the ISO 45001 standard certification for the management of Health and Safety issues for concerned sites.

##### Health & Safety policy

- Suppliers should implement both a policy and all procedures necessary for identifying and preventing health and safety risks not only for its employees, but also for any stakeholders likely to be affected. These procedures and policies should be applied through concrete actions plans involving all levels of responsibility including labor and management representatives. It shall take any relevant measures to limit and, insofar as is possible, eliminate these risks. An investigation system should be put in place to determine the root cause of incidents and accidents and ensure that corrective measures have been taken to minimize the chance of recurrence.
- Suppliers shall provide their workforce with necessary Personal Protection Equipment (PPE) when required.
- Suppliers shall develop an emergency preparedness and response plan.

##### Intervention on NOVARES sites

- Suppliers undertake to inform NOVARES of any dangers or risks related to their products or interventions on NOVARES sites.
- Suppliers shall ensure the respect by its employees, providers and sub-contractors of the health and safety rules applicable at the time of their interventions on NOVARES sites.

##### Hazardous substances

- Suppliers shall identify and manage chemicals to ensure their safe handling, labelling, storage, use, recycling, transporting and disposal.
- Suppliers should reduce the material consumption through process optimization and use of alternative, less hazardous substances in their operations to maintain product and environmental stewardship.
- Suppliers should collect data from their material manufacturers for all chemicals and components classified as hazardous substances.
- Suppliers shall wherever possible avoid the use of toxic products. In cases where there is no alternative solution to the use of such products, Suppliers shall limit use and ensure that their handling and use do not represent a danger for individual health. Concerning any other dangerous substances, elements or dangerous waste, of which use is limited, Suppliers shall strictly adhere to the applicable legal provisions.

## 5. **Environment**

NOVARES expects its Suppliers and their entire supply chain to comply with environmental laws and regulations and to limit their environmental impact by controlling disturbances and pollution related to their activities, by making reasonable use of natural resources and by developing responsible waste management. Suppliers undertake to retain and keep up-to-date all approvals required with regard to the environment.

NOVARES encourages initiatives that help reduce environmental impact, in particular by the use of environmentally friendly technology and the obtaining of ISO 14001 for environmental management and ISO 50001 for energy management.

### Climate Change mitigation and Greenhouse Gases emissions

Suppliers undertake to implement a policy to reduce Greenhouse Gases (GHG) emissions in order to contribute to NOVARES Carbon Net Zero roadmap.

To this end, they will:

- (i) communicate each year the GHG emissions related to the production, upstream and downstream transport of the goods and services purchased by NOVARES (scope 1, 2 and 3)
- (ii) answer Part Carbon Footprint information requests regarding its accuracy (methodology, tools, data accuracy, appropriate evidence).

Suppliers are encouraged to set Scope 1, Scope 2 and Scope 3 GHG emissions targets aligned with the Paris Agreement and global 2050 carbon neutrality, and to disclose data using the Carbon Disclosure Project (CDP) platform.

Suppliers are also encouraged to evaluate and anticipate impacts of Climate Change upon their activities and their own supply chain.

### Energy management

- Suppliers should use renewable energy where possible and provide transparency and evidence upon request.
- Suppliers should control and document their energy consumption.
- Suppliers shall strive to set targets to reduce their energy consumption while improving their energy efficiency based on their reduction plan, implementing industry best practices.

### Water management

- Suppliers should preserve water resources through an assessment of water stress in operations and throughout the life cycle.
- Suppliers should reduce water consumption and reuse and recycle water with responsible treatment of wastewater discharges.
- Suppliers should prevent potential impacts from flooding as a consequence of rainwater run-off.

### Air Quality & Noise

- Suppliers should monitor, disclose, and to the extent as possible, eliminate emissions contributing to air pollution as required by and in accordance with applicable law.

- Suppliers should create an air emissions management plan, that meets or exceeds regulatory requirements, to mitigate their pollution levels and assessing cumulative impacts of pollution sources.
- Suppliers should monitor and control the levels of industrial noise to avoid noise pollution.

#### Use of natural resources and circular economy

- Suppliers should encourage and support the use of sustainable, renewable natural resources in an efficient manner over the product's life cycle and promote ecodesign and circularity in their activities.
- Suppliers should reduce environmental impacts of their product solutions by using Life Cycle Assessment (LCA) to design for recycling-optimized vehicle during the entire life cycle of the goods. Suppliers should be able to provide LCA results and calculation details upon NOVARES' request.
- Suppliers should integrate recycled and/or renewable material solutions for their components.
- Suppliers should promote closed loop systems while reducing waste and increasing reuse and recycling.
- Suppliers should set targets for waste reduction and establish a waste management hierarchy in following priority order: prevention, reduction, reuse, recovery and recycling.
- Suppliers shall use the needful treatment and dispose safely all kinds of waste and hazardous substances generated.
- Suppliers should promote the reduction of single-use packaging.

#### Animal Welfare

- Suppliers should respect and ensure that its Suppliers respect the five animal rights formalized by the World Organization for Animal Health (OIE) concerning animal welfare.

#### Soil quality

- Suppliers should monitor and control their impact on soil quality to prevent erosion, nutrient degradation, subsidence and contamination.

#### Biodiversity, land use and deforestation

- Suppliers shall protect ecosystems by developing and implementing a strategy and action plans to prevent, reduce and offset adverse impacts by their operations.
- Suppliers shall avoid any illegal deforestation in accordance with international biodiversity regulations, including the International Union for the Conservation of Nature (IUCN) Resolutions and Recommendations on Biodiversity.
- Suppliers should take specific measures, including due diligence throughout its supply chain, to prevent or mitigate the risk of deforestation, in alignment with the United Nation's New York Declaration on Forests and the OECD-FAO Business Handbook on Deforestation and Due Diligence in Agricultural Supply Chains. Suppliers undertake to forbid deforestation or land conversion throughout its supply chain.
- When requested, Suppliers commit to provide to NOVARES:
  - a detailed mapping of its supply chain (from the "farm" or "mine" to the plant) that includes the address of each manufacturing site
  - a public deforestation-free and land conversion- free commitment, published on its website in a transparent manner
  - a time-bound plan with clear actions and milestones to meet that commitment
  - supply chain management systems in place to deliver on the commitment

- regular public reporting of progress
- independent verification of the systems used to deliver the deforestation-free and land conversion-free products.

## **6. Follow-up and respect of the Supplier commitments**

### Follow-up and control

The Purchasing Department of NOVARES may, depending on the circumstances, take measures they deem necessary to ensure full compliance with this Code of Conduct, in particular by sending questionnaires or performing, or tasking third parties to perform, specific audits at the Suppliers and sub-contractors premises.

Suppliers undertakes to provide reasonable support and act diligently for the completion of these audits, in particular by providing, at first request, as soon as possible and in a substantiated and complete manner, all the information, clarifications or explanations requested by NOVARES.

If applicable, Suppliers shall ensure effective cooperation and coordination with their own suppliers and sub-contractors.

### Non-compliance with commitments

In cases where Suppliers, due to specific circumstances, are unable to respect certain provisions of this Code of Conduct, it is obliged to inform NOVARES without delay in order to agree upon corrective measures to be implemented. If Suppliers discover that they have or are likely to have violated any one of the provisions of this Code of Conduct, they shall immediately inform NOVARES and cooperate in any investigation undertaken by NOVARES in this regard.

Any serious and willful non-compliance with the commitments set forth in this charter shall constitute non-compliance with Suppliers' contractual obligations.

In this specific case, NOVARES may automatically and without prejudice to any damages:

- request that Suppliers implement the required corrective measures within a given time period and/or
- depending on the severity of non-compliance, terminate all or part of the contracts and/or business relations with concerned Suppliers on the grounds of wrongful non-compliance.



### Suppliers' relationship with their own suppliers

NOVARES expects its Suppliers to cascade the above principles throughout their supply chains. As a result, they undertake to:

1. raise its own supplier's awareness on corporate and social responsibility (CSR) issues
2. establish a responsible procurement policy respecting these Guidelines
3. implement all due diligence measures with respect to its own subcontracting chain.

### Suppliers' agreement

NOVARES expects its Suppliers to conduct a self-assessment of their compliance with this Code of Conduct and offers them technical support toward enhancing their performance. Suppliers acknowledge having read and understood the guidelines and agree to apply them, throughout its company/group and within its entire supply chain. If necessary, it commits itself and all its subsidiaries and affiliates throughout the world that provide goods or services to NOVARES.

Supplier formally accepts the principle that self- assessment questionnaires will be addressed to it, that they should be completed, and that audits can be carried out at its various sites, or at those of its subsidiaries, by NOVARES or by a third party appointed by NOVARES for this purpose.

NOVARES may revise or supplement this Supplier Code of Conduct at any time. NOVARES will promptly distribute any such modifications, and at that time, Suppliers will be required to sign a new acknowledgement to reaffirm that they will adhere to the latest version of the Supplier Code of Conduct. Suppliers have a continuing obligation to familiarize themselves with revisions and to ensure they comply with all laws and with this Supplier Code of Conduct.

