

# Supplier Code of Conduct

Effective Date: 04/01/2025

Applies To: All Suppliers, Contractors, and Subcontractors of Novus International, Inc.

## 1. Introduction

At Novus International, Inc., we are committed to the highest standards of ethical and sustainable business practices. Our suppliers are critical partners in achieving these standards, and this Supplier Code of Conduct outlines the principles and expectations that all suppliers must adhere to while conducting business with NOVUS. The Code of Conduct is not a substitute for, nor should it be considered to replace or override, applicable laws and regulations but sets the minimum standards of behavior that are to be followed.

## 2. Compliance with Laws and Regulations

Suppliers must:

- Comply with all applicable international, national, and local laws, including environmental, labor, trade, and intellectual property laws.
- Abide by NOVUS' specific product regulations and ensure all goods and services meet required standards and certifications.

## 3. Ethical Business Practices

- Prohibit all forms of corruption, extortion, and bribery. This includes compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws globally.
- Avoid conflicts of interest and disclose any situations that may pose a conflict

## 4. Labor and Human Rights

- Provide safe and healthy working conditions for all employees.
- Prohibit forced labor, bonded labor and human trafficking.
- Prohibit child labor and comply with the minimum working age stipulated by the local law.
- Respect employees' rights to freedom of association and collective bargaining rights.
- Ensure fair wages and working hours in accordance with local labor laws.
- Prohibit any form of discrimination in employment.

## 5. Environmental Responsibility

- Adhere to applicable environmental laws and regulations.
- Strive for energy efficiency, waste reduction, and sustainable resource use in operations.
- Avoid the use of prohibited substances or materials as detailed by NOVUS® product guidelines.

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- Confirm business partners are showing sufficient consideration to relationships with local communities and customary rights of local peoples. Strive to respect the human rights and cultures of indigenous peoples in accordance with relevant international standards such as the United Nations Declaration on the Rights of Indigenous Peoples, the Convention concerning Indigenous and Tribal Peoples in Independent Countries (ILO Convention: C169), the principle of Free, Prior and Informed Consent (FPIC), as well as all applicable laws and regulations.
- To strive to ensure traceability in Paper Products, Natural Rubber, Palm Oil and Timber production areas
- To confirm that business partners have taken environmental impact into account, including the conservation of ecosystems and water resources in production areas, and chemical substance management
- To avoid being complicit in development that affects high conservation value (HCV), high carbon stock (HCS), or peat swamp forests.
- To strive to expand handling of products that have received internationally trusted forest certification.
- To promote procurement based on the NDPE (No Deforestation, No Peat, No Exploitation) principle.
- To confirm that Timber has been legally certified.

## 6. Quality and Safety

- Ensure all products meet NOVUS quality standards and regulatory requirements.
- Implement robust quality control measures and provide accurate product labeling and documentation.

## 7. Confidentiality and Intellectual Property

- Protect all confidential information and intellectual property belonging to NOVUS.
- Use NOVUS trademarks, brands, and other intellectual property only as permitted and in compliance with company guidelines.

## 8. Monitoring and Reporting

- Allow NOVUS or its representatives to conduct audits and inspections of supplier facilities to verify compliance with this code.
- Report any suspected or actual violations of this code to NOVUS in a timely manner through its reporting mechanisms.

## 9. Consequences of Non-Compliance

- NOVUS reserves all rights and remedies available under applicable law and/or contract documents, including without limitation, the potential right to pursue legal remedies and/or terminate business relationships with suppliers who fail to comply with this Code of Conduct.

