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# SUPPLIER CODE OF CONDUCT

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## CEO STATEMENT



**A**t Novasep, we are committed to complying with applicable laws and upholding internationally recognized corporate, social and environmental governance standards (together the “Governance Standards”).

Novasep aspires to promote and encourage social responsibility throughout its value chain. As a result, Novasep prefers to do business with partners whose values are consistent with its own. Novasep therefore expects its suppliers and their own suppliers and subcontractors to fully comply with applicable laws and adhere to the Governance Standards.

We particularly expect our suppliers to support and respect the following Governance Standards.

**Michel Spagnol**  
**Chairman & CEO**

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## 1. COMPLIANCE WITH LAWS AND REGULATIONS

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Suppliers shall comply with all laws and regulations applying to them in all countries where they conduct business.

Suppliers shall support the protection of internationally proclaimed human rights.

Suppliers shall comply with all applicable trade sanctions, import and export laws and regulations when engaging in international trade and transferring goods, funds, services, software or technology. ■



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## 2. LABOR

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Suppliers shall not use child labor and shall ensure that young workers are above a country's legal age for employment.

Suppliers shall not use or support the use of forced or bonded labor. The use of inhumane treatment and corporal punishment shall be banned by suppliers.

Suppliers shall fight discrimination in the workplace and ensure their employees are working in a harassment-free environment.

Suppliers shall recognize and respect the rights of employees to freedom of association and collective bargaining.

Wages and benefits paid to supplier's employees shall abide by applicable national laws. Working hours of suppliers' employees shall not exceed the maximum set by applicable law.

Suppliers shall comply with employees' rights to privacy and data protection, as set by applicable law. ■

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## 3. ETHICS

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Suppliers shall not engage in or tolerate any form of bribery, corruption, extortion or embezzlement, and shall not offer Novasep's employees any gifts or personal benefits likely to influence their decision making.

Suppliers shall comply with applicable laws regarding fair competition and engage in fair business practices.

Suppliers shall use valid intellectual property rights.

Suppliers shall have policies and procedures in place to ensure that books, records and accounts are accurate, complete and transparent.

Suppliers shall ensure that their employees' decisions are not based on any conflict of interest. ■



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## 4. HEALTH, SAFETY AND ENVIRONMENT

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Suppliers shall comply with all applicable laws and regulations regarding health, safety and environment. They shall obtain and keep updated all permits, licenses and registrations needed.

Suppliers shall provide their employees with a healthy and safe working environment.

Suppliers shall have systems in place to ensure that waste, air emissions and wastewater discharges are managed safely before, during and after release into the environment.

Suppliers are also expected to engage in climate-friendly processes to reduce power consumption, greenhouse gas emission and to limit the use of natural resources. ■

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## 5. COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

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Suppliers are expected to abide by the above principles and to assess and manage risks in all areas addressed in this document. They are encouraged to implement their own binding guidelines or policies to ensure compliance with the Governance Standards.

Suppliers are also responsible for ensuring that their own suppliers and subcontractors follow the principles set out in the Supplier Code of Conduct.

Novasep may ask its suppliers based on a risk-based approach to verify their compliance with the requirements of the Supplier Code of Conduct by (i) self-assessments or third-party desktop assessments on their performance and compliance with the Governance Standards, (ii) providing compliance statements confirming compliance with the Governance Standards (see Appendix I), or (iii) subject to their permission, conducting itself or with a third party acting on Novasep's behalf on-site audits to verify compliance with the Governance Standards.

Suppliers are expected to report any suspected violations of the Supplier Code of Conduct to their Novasep contact person or by writing to [supplier.compliance@novasep.com](mailto:supplier.compliance@novasep.com) and to take appropriate corrective action if there is a cause for concern.

Serious and/or repeated failure of a supplier to comply with the Supplier Code of Conduct shall impact directly the ability of the supplier to do business with Novasep. ■

# Appendix I Supplier Acknowledgement<sup>1</sup>



We, the undersigned hereby confirm that:

- We have received and taken due note of the contents of the Supplier Code of Conduct version April 2018.1,
- We will comply with the Novasep Supplier Code of Conduct requirements,

We understand we may be asked by Novasep to accept additional investigations, site visits or an audit in order to provide required levels of assurance with the standards prescribed.

Name of Company: .....

Company's Business Registration/Code/Number: .....

Company address: .....

Name and Title: .....

Signature:

Company Stamp/Seal:

Date & Place: .....

<sup>1</sup> Upon Novasep request, please return a signed copy of this compliance statement within fifteen (15) calendar days of receipt of the Supplier Code of Conduct.

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## SUPPLIER CODE OF CONDUCT

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## CONTACT

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[supplier.compliance@novasep.com](mailto:supplier.compliance@novasep.com)

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France

Commitment

Innovation

Customer Focus

Integrity

Team Work