

NOVICHEM ETHICAL CODE OF CONDUCT

NOVICHEM Sp. z o.o. declares that it always works in accordance with applicable national law and other relevant laws in all spheres of its activities, while observing the provisions of the European Convention on Human Rights.

NOVICHEM is a member of **SEDEX** organization since 2014. It is non-profit organization which offers its members a wide range of services related to the ETI Base Code.

Below Ethical Code applies to every **NOVICHEM** employee, contractor and to everyone conducting business on behalf of **NOVICHEM**.

NOVICHEM company declares that it complies with all rules concerning work in particular:

1. EMPLOYMENT VOLUNTARY

Novichem company does not use forced, bonded or involuntary prison labour.

It is forbidden to require from employee any deposits or identity papers and are free to leave their employer after reasonable notice.

2. REGULATED EMPLOYMENT RELATIONSHIP

Employment of employees takes place in accordance with current law in force in Poland.

3. SAFE AND HYGIENIC WORKING CONDITIONS

A safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Workers receive regular and recorded health and safety training.

4. CHILD LABOR

NOVICHEM company does not employ children. The rules of employing minors (apprentices, interns, students) are in line with legal rules set out in the Labor Code.

5. FAIR PAY

Each worker receives a written and understandable contract about their employment conditions, wage, and position for which he is employed before he enters employment.

6. PROHIBITION OF EXCESSIVE WORKING TIME

Working hours must comply with employment contract, national law, and other applicable contracts. All overtime hours are voluntary.

7. PROHIBITION OF DISCRIMINATION AND NON-HUMAN TREATMENT

There is no discrimination in hiring, compensation, access to training, promotion, termination of work or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE NEGOTIATIONS ON EMPLOYMENT CONDITIONS

NOVICHEM Company enables the independent and free association of employees and negotiation.

9. DEALING WITH CONFLICT OF INTEREST

A conflict of interest is a situation posing a risk that personal interest of an employee may interfere or has the appearance of interfering with legitimate business interests of NOVICHEM or may affect in the future improperly on its disinterestedness or impartiality.

Any NOVICHEM employee must be vigilant and adopt appropriate behaviour in situations in which the objectivity of his/her business decision may be impaired, especially in:

- undertaking obligations in the form of performing work or receiving compensation from a NOVICHEM supplier or customer
- maintaining a financial interest with a NOVICHEM competitor, customer or supplier or any third party doing business with NOVICHEM
- obtaining personal benefits from a third party to influence favourable decision by NOVICHEM towards that third party
- purchasing goods or services on behalf of NOVICHEM from a relative or a company in which a relative has any interest
- soliciting personal benefits in the form e.g. a valuable item (gift, gratuity voucher) in exchange for making favourable decision or influencing other people making such decision

NOVICHEM employees should report any actual or potential conflicts of interest prior to engaging in any transaction, activity or relationship leading to a reportable situation.

10. FIGHTING BRIBERY AND CORRUPTION

NOVICHEM company undertakes to act against corruption and bribery among its employees in relation to contractors and public officials.

According to the Civil Law Convention on Corruption of the Council of Europe, adopted 4 November 1999 (Polish Journal of Laws of 2004, No. 244, item 2443), corruption means requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or prospect thereof, which distorts to proper performance of any duty or behaviour required of the recipient of the bribe, any undue advantage or prospect thereof.

A bribe is defined as anything that has value and may include: cash, gifts, vouchers, travel, job offers, donation, etc.

11. PARTICIPATING IN PUBLIC LIFE

NOVICHEM is involved in the public life of the region where it operates and actively supports public organizations (kindergartens, schools, nursing homes, foundations, etc.) making a positive contribution to public life. This support may take the form of a donation or image support. NOVICHEM operates in public life according to applicable law, with transparency and fairness.

NOVICHEM employees may not act or speak on public matters on behalf of NOVICHEM without the authorization of the Management Board of the Company.

12. RESPECTING FREE COMPETITION

All NOVICHEM employees must comply with competition and antitrust laws and refrain from any unfair behaviour towards competitors. Anti-competitive behaviours may include:

- concluding agreements, including informal ones, with competitors to fix prices (price fixing), bid rigging, dividing the market or groups of customers and agreements to limit supply.
- Exchanging competitively sensitive information with competitors
- concluding tender agreements (bid rigging)
- abusing of a potential position of market dominance
- imposing restrictions on customers or suppliers. Entering into specific mergers and acquisitions.
- Newly hired employees should not disclose confidential information about competitors with whom they previously worked

13. ENVIRONMENTAL PROTECTION

NOVICHEM undertakes to minimize the negative impact on the natural environment by:

- compliance with the requirements of current legal regulations regarding environmental protection in its business activity
- providing customers with information on safe use, storage, transport and disposal of delivered products
- rational use of electricity and water
- responsible waste management
- reducing emissions of pollutants to air and water
- making every effort to prevent emergencies that may have a negative impact on the environment

14. REPORTING GRIEVANCE

Complaints about the violation of the above code of ethics can be reported anonymously, without fear of any reprisals, using the following options:

- sending written information by traditional mail to the following address:
[NOVICHEM Sp. z o.o., 41-508 Chorzów ul. Główna 4](mailto:etyka@novichem.com)
- by e-mail: etyka@novichem.com

Chorzów, 26.10.2021


DYREKTOR NACZELNY
PREZES ZARZĄDU
mgr inż. Marcin Skop