

Document Name:	Novo Logistics' Partner Code of Conduct	Revised By:	SR
Owner:	Legal	Revision Date:	06/09/2025
Approved By:	Executive Leadership Team	Revision No.:	2
Document No.:	NV-GOV-POL-0009	Pages:	1 of 7

PURPOSE

Novo Logistics is committed to conducting business ethically, legally, and in a manner that ensures long-term sustainability. This Partner Code of Conduct ("Code") establishes the standards we expect from all partners who do business with us.

SCOPE

For purposes of this Code, "Partner" refers to any vendor, supplier, customer, contractor, or other party that Novo Logistics works with in the course of business. Partners must comply with this Code while conducting business with or on behalf of Novo. Partners are also expected to hold their own suppliers and subcontractors to these standards.

POLICY

LABOR AND HUMAN RIGHTS

Child Labor and Young Workers

Partners must not allow child labor under the age of 16 (or local legal minimum age, whichever is higher). Young workers (16-18) must not perform hazardous work, night shifts, or work that interferes with educational needs. Partners must maintain proper documentation of age verification procedures to ensure compliance. Partners must comply with applicable local and international labor laws, including ILO Convention No. 138 and 182, regarding child labor.

Wages and Benefits

Partners must, at a minimum, pay the applicable legal minimum wage and provide all legally mandated benefits. We encourage our partners to understand and align compensation with industry standards where feasible. Overtime must be paid at premium rates as legally required. Partners should provide clear, written wage statements to workers and shall not use deductions from wages as a disciplinary measure.

Working Hours

Working hours must not exceed legal limits, and workers are entitled to at least one day off in every seven-day period. All overtime will be voluntary except in exceptional circumstances, or if recurring as part of an agreed-upon regular schedule. Partners must maintain accurate time records for all workers to demonstrate compliance with working hour limitations.



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Modern Slavery

Partners must maintain zero tolerance for any form of slavery, servitude, forced labor, or human trafficking. The withholding of identity documents or work permits is prohibited. Partners should not charge recruitment fees to workers and should not unreasonably restrict freedom of movement.

Ethical Recruiting

Partners should provide clear terms of employment prior to hiring and avoid misleading or fraudulent recruitment practices. Only legally registered recruitment agencies should be used. Partners must ensure no discrimination occurs in hiring practices and that all recruitment processes are ethical and transparent.

Freedom of Association

Partners should respect workers' rights to form and join trade unions and allow collective bargaining without interference. Where legally restricted, partners should facilitate alternative means of worker representation. There should be no discrimination against worker representatives, and open communication between workers and management should be encouraged.

Non-Discrimination and Harassment

Partners must provide equal opportunity regardless of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status. There must be zero tolerance for harassment, abuse, or intimidation in the workplace. Partners should implement effective grievance mechanisms to address concerns.

Women's Rights

Partners should ensure equal pay for equal work and equal opportunity for advancement for women. Accommodation for pregnancy and maternity needs must be provided in accordance with local laws. Partners must protect against gender-based discrimination and harassment and promote gender equality in all aspects of employment.

Diversity, Equity and Inclusion

Partners should promote a diverse and inclusive workplace and implement policies that foster equity. Reasonable accommodations for disabilities must be provided, and partners shall ensure equal access to opportunities for all employees regardless of background or personal characteristics.

Rights of Minorities and Indigenous Peoples

Partners must respect cultural rights and traditional livelihoods of minorities and indigenous peoples. Free, prior, and informed consent must be obtained for activities affecting indigenous communities. Partners should prevent discrimination against minority groups and respect cultural heritage and traditional knowledge.



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Land, Forest and Water Rights

Partners should respect legal and customary land rights and avoid forced evictions. Fair compensation must be provided for legitimate land use. Partners should ensure sustainable use of forest and water resources and respect the rights of local communities to these resources.

Use of Security Forces

Security practices must respect human rights, and security personnel must be properly trained in human rights principles. Use of force should only occur when necessary and proportionate.

HEALTH AND SAFETY

Workplace Safety

Partners must provide a safe and healthy working environment and implement occupational health and safety management systems. Regular safety training should be provided for all workers, and proper maintenance of equipment and facilities must be ensured to prevent workplace accidents and injuries. Partners must comply with local occupational safety laws and applicable national or international safety standards.

Emergency Preparedness

Partners should maintain emergency exits, equipment, and evacuation plans and conduct regular emergency drills. First aid supplies must be readily available, and emergency response procedures should be clearly communicated to all workers to ensure preparedness for potential emergencies.

Accident Prevention

Partners should identify and assess safety risks and implement preventive measures to mitigate these risks. Appropriate personal protective equipment must be provided to workers at no cost. All incidents must be reported and investigated to prevent recurrence and improve safety conditions.

Industrial Hygiene

Partners should monitor and control exposure to hazardous substances and ensure proper ventilation and temperature control in work environments. Adequate lighting and ergonomic considerations must be addressed, and workers must have access to clean drinking water and sanitary facilities at all times.

BUSINESS ETHICS

Anti-Corruption and Anti-Money Laundering

Partners must maintain zero tolerance for bribery, corruption, extortion, or embezzlement and comply with all applicable anti-corruption laws. Facilitation payments are prohibited. Partners should implement procedures to prevent money laundering and maintain transparency in all financial transactions.



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Data Protection and Security

Partners should protect confidential information and personal data and implement appropriate data security measures. Compliance with applicable data protection regulations is required. Partners must report any data breaches promptly and take appropriate measures to mitigate potential harm.

Financial Responsibility

Partners should maintain accurate books and records and comply with accepted accounting practices. Falsification of documents is prohibited. Partners must cooperate with audits and assessments and maintain transparency in financial reporting.

Disclosure of Information

Partners should maintain transparent business practices and provide accurate disclosure of information regarding labor, health and safety, environmental practices, and business activities. Falsification or misrepresentation of information is prohibited, and partners should be forthcoming with relevant information when requested. Novo may request supporting documentation to verify disclosures or reported practices.

Fair Competition and Anti-Trust

Partners should conduct business in accordance with fair competition principles and avoid anti-competitive agreements or practices. Abuse of market position is prohibited. Partners should respect intellectual property rights and engage in fair and ethical competitive practices.

Conflicts of Interest

Partners must disclose any potential conflicts of interest and avoid situations that create or appear to create conflicts. Partners should not seek improper advantage through manipulation or concealment of information and should maintain ethical business relationships.

Counterfeit Parts

Partners should implement methods to detect counterfeit parts and ensure product authenticity and traceability. Suspected counterfeit products must be reported promptly. Partners should maintain chain of custody documentation to verify the authenticity of products and materials.

Intellectual Property

Partners should respect intellectual property rights and avoid unauthorized use of patents, trademarks, or copyrighted materials. Novo Logistics' intellectual property must be protected, and partners should ensure proper licensing of software and technology used in business operations.

Export Controls and Economic Sanctions

Partners must comply with applicable export control laws and screen against restricted party lists. Proper documentation for international transactions should be maintained. Partners should not conduct business with sanctioned countries or entities in violation of applicable laws.



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Whistleblowing Protection

Partners should provide mechanisms for confidential reporting of concerns and ensure no retaliation against whistleblowers. Reported issues must be promptly investigated, and appropriate corrective actions taken. Partners should foster a culture that encourages ethical behavior and reporting of concerns.

ENVIRONMENTAL SUSTAINABILITY

GHG Emissions

Partners should measure and report greenhouse gas emissions and set targets for emissions reduction. Carbon management strategies should be implemented, and progress tracked with appropriate documentation. Partners should work toward reducing their carbon footprint in alignment with global climate goals.

Energy Management

Partners should implement energy efficiency measures in operations and utilize renewable energy where feasible. Energy consumption should be monitored and reported, and regular energy audits conducted to identify opportunities for improvement and reduction of environmental impact.

Decarbonization

Partners should develop and implement a transition plan to low-carbon operations and work toward reduction of fossil fuel dependency. Investment in clean technologies is encouraged, and carbon offset programs should be considered for unavoidable emissions to minimize climate impact.

Water Management

Partners should practice responsible water consumption and implement wastewater treatment and monitoring. Water recycling and conservation measures should be adopted, and watershed protection initiatives supported to ensure sustainable water management throughout operations.

Air Quality

Partners should control and reduce air pollutant emissions and monitor air quality impacts. Best available technologies should be implemented to minimize air pollution, and partners should comply with all applicable air quality regulations to protect community health.

Chemical Management

Partners should ensure safe handling, storage, and disposal of chemicals and work toward reduction or elimination of hazardous substances. Chemical inventory management systems should be maintained, and employees must receive appropriate training on chemical safety to prevent accidents. Compliance with local chemical safety regulations and applicable global frameworks (e.g., REACH, OSHA HazCom) is required.



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Resource Management

Partners should use natural resources efficiently and implement sustainable sourcing practices. Life cycle assessment of products and services should be conducted, and circular economy principles applied to minimize resource consumption and environmental impact.

Waste Management

Partners should implement waste reduction at source and establish reuse and recycling programs. Responsible disposal of hazardous waste is required, and partners should work toward zero landfill targets where feasible to minimize environmental impact from waste generation.

Animal Welfare

Partners should ensure humane treatment of animals and avoid testing on animals unless legally required. Compliance with animal welfare regulations is mandatory, and partners should implement responsible sourcing of animal-derived materials to prevent cruelty and ensure ethical treatment.

Biodiversity and Land Use

Partners should minimize impact on biodiversity and avoid deforestation of primary forests. Land restoration and conservation efforts should be supported, and partners should implement measures for protection of endangered species affected by their operations.

Soil Quality

Partners should prevent soil contamination and implement soil conservation practices. Remediation of contaminated sites must be undertaken when necessary, and partners should monitor soil health to ensure sustainable land use practices.

Noise Emissions

Partners should minimize noise pollution and implement noise reduction technologies where appropriate. Noise levels should be monitored regularly, and community impact considered when planning operations to reduce disturbance to surrounding areas.

IMPLEMENTATION AND COMPLIANCE

Management Systems

Partners should implement appropriate management systems to ensure compliance with this Code and engage in regular self-assessment and continuous improvement. Necessary documentation and records must be maintained, and responsible personnel should be designated for Code implementation.

Monitoring and Assessment

Partners may be subject to assessments or audits and must provide access to relevant documentation when requested. Partners should cooperate with announced and unannounced inspections and participate in



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capability building initiatives to improve compliance with the Code. Partners may be subject to periodic reviews conducted by Novo or approved third-party assessors.

Corrective Action

Partners should address non-compliance through corrective action plans and implement timely remediation measures. Progress and improvements must be documented, and persistent issues reported to Novo Logistics to ensure transparency and accountability in addressing compliance concerns.

Consequences of Non-Compliance

Failure to comply with this Code may result in requirement for immediate corrective action, suspension of business relationship, termination of contract, or legal action where applicable. Partners are expected to take compliance seriously and address any identified issues promptly.

COMMITMENT AND ACKNOWLEDGMENT

By doing business with Novo, Partners acknowledge they have read and understand this Code and commit to complying with its requirements. If a Partner is found in violation of any of these provisions, Novo may suspend or terminate the business relationship and report the violation to relevant authorities. Partners are responsible for ensuring their employees, subcontractors, and their own supply chain understand and adhere to these standards.

We recognize that achieving the standards in this Code is a dynamic process and encourage Partners to continuously improve their operations.

For questions regarding this Code or to report concerns, please contact Novo's VP of Compliance at sam.reviglio@novo-usa.com.

