

CODE OF CONDUCT SUPPLY CHAIN 2026



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1. COMMITMENT

At Novenco we are committed to conducting our business with integrity, responsibility, and respect in everything we do. We require the same high standards in our supply chain.

Acceptance and compliance of this Code of Conduct (CoC) is a condition for becoming and remaining an approved supplier to Novenco.

Novenco follows the requirements of this document. The supplier shall ensure that any of its sub-contractors do the same.



2. REQUIREMENTS

Suppliers shall, upon request, document their compliance with the requirements. If required, Supplier shall facilitate for site visits and inspection of working conditions, both at its own premises and at the premises of its sub-suppliers. By this, the Supplier accept that audits may be conducted.

The Supplier shall comply with applicable local and international laws and regulations which further specifies the requirements set out in this document, as they may be amended from time to time. Any breach of this CoC entitles Novenco to terminate its relationship with the supplier with immediate effect.

HUMAN RIGHTS & WORKING CONDITIONS

The Supplier shall:

- Acknowledge and comply with the fundamental principles of human rights as defined in the Universal Declaration of Human Rights and the ILO Declaration of Fundamental Principles and Rights at Work.
- Respect the right to freedom of association and the right to collective bargaining within national laws and regulations.
- Prevent discrimination and promote equality in all practices.

HEALTH, SAFETY AND ENVIRONMENT

The Supplier shall:

- Ensure a safe working environment and provide regular health and safety training.
- Promote good health and a safe, secure working environment in compliance with relevant internationally recognized standards.
- Always strive to minimize the impact of its operations on the environment and respect national and international environment legislation.

ANTI-CORRUPTION AND ANTI-BRIBERY

The Supplier shall:

- Have a zero tolerance for corruption, including bribery, extortion kickbacks and improper benefits to customers, agents, contractors, suppliers or

- employees of any such party or governmental officials, whether direct or indirect.
- Notify Novenco immediately of any suspect or actual corruption or bribery.

- Ensure that any IT equipment used in communication is sufficiently updated with required anti-virus protection and protection against breaches of IT systems such as firewall or equivalent.

TRADE AND SANCTIONS

The Supplier shall:

- Comply with all relevant trade compliance regulations export legislation, including sanctions.
- Monitor compliance.
- Not performing obligations where this would violate applicable sanctions.
- Notify Novenco if sanctions prevent performance.

SUPPLIER RELATIONS AND FAIR COMPETITION

The Supplier shall:

- Compete fairly.
- Follow ethical standards and demonstrate business ethics.
- Treat its suppliers impartially.

CYBER SECURITY AND DATA PROTECTION

The supplier shall:

- Ensure that the cybersecurity arrangements are appropriate to the information assets' requirements. This must include appropriate management arrangements to manage risk, monitor compliance, and report and respond effectively to any incidents.
- Ensure compliance with laws and directives providing protection, transfer, access, and storage of information.
- Ensure that the staff has sufficient competence to manage cyber security and data protection.

ISO 9001

Novenco AS is committed to ISO 9001 Quality Management System, by consistently providing products and services that meet customer and regulatory requirements and perform continuous improvement.

The Supplier shall:

- Be able to document a company quality system, as applicable to the nature of the contractual relationship and the equipment or service provided.

ISO 27001

Novenco AS is committed to ISO 27001 Information Security Management System, by preserving confidentiality, integrity and availability of critical information assets.

Novenco has the right to audit suppliers according to the principles of information security based on ISO 27001.

The Supplier shall:

- Be able to document a company information security management system, as applicable to the nature of the contractual relationship and the equipment or service provided.