



HUMAN RIGHTS POLICY

EFFECTIVE DATE

January 2024

■ PURPOSE

Respect for Human Rights is a fundamental value of Novolex Holdings, LLC, and the entities that it owns or has a controlling interest, (collectively “Novolex” or the “Company”). The purpose of this policy is to respect and promote Human Rights in our relationships with our employees, suppliers and business partners.

■ SCOPE

The Policy applies to Novolex’s employees, agents and contractors and includes upstream and downstream supply chain business partners as set forth in the Novolex Supplier Code of Conduct. In some locations, statutory requirements may require Novolex to conform to additional obligations.

The Chief Human Resources Officer, Office of the General Counsel, Compliance Leader and Senior Vice President of Corporate Affairs are owners of this Policy and are responsible for overseeing its implementation, administration, and interpretation.

■ POLICY STATEMENT

Novolex is committed to engaging in responsible business practices and ethical conduct in every aspect of our business, supporting a workplace in which employees can expect to grow, contribute, and participate free from discrimination and unfair treatment. Novolex values the fundamental dignity and worth of every individual, regardless of race, gender, nationality, religion or any other protected status in accordance with all applicable laws and regulations. Novolex will not tolerate Human Rights violations or child labor practices in violation of applicable laws. Novolex is a company that takes safety seriously and will take reasonable steps to address any violations of this Policy.

■ OUR COMMITMENT

Novolex is committed to:

- Respecting Human Rights as defined in the International Bill of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. Novolex is guided by the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact, and Novolex will seek to conduct business in a manner that does not cause, and is not complicit in, Human Rights abuses either directly or through our business relationships.
- Complying with all laws and regulations applicable to Human Rights in the countries in which Novolex operates and regularly reviewing jurisdictional requirements and conditions to identify Human Rights risks associated with our activities, with the intention of preventing and mitigating adverse impact.
- Respecting the cultures, traditions, and rights unique to indigenous communities, and supporting the United Nations Declaration on the Rights of Indigenous Peoples, and to achieving the free, prior, and informed consent of indigenous peoples including stakeholders in the acquisition, use and management of land.
- Respecting the rights of our workforce, local community members and all stakeholders with whom Novolex interacts. Novolex expects our business partners, including contractors and suppliers, to respect the legal rights of their workforce regarding freedom of association, collective bargaining, and the right to refrain from such activities, fair wages and benefits, equal opportunity, and freedom from discrimination in accordance with the legal framework governing such workforce matters in all applicable jurisdictions.
- Not discriminating against any individual on the basis of race, gender identity, religion, age, social status, sexual orientation or any other protected characteristic unrelated to the individual’s job performance. Novolex will not tolerate discrimination, harassment, physically threatening or intimidating behavior, unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners.
- Prohibiting child labor, forced labor, human trafficking, or modern slavery in our operations and in our supply chains, and supporting the elimination of all forms of child and forced labor. In this context, Novolex policies and procedures align with the provisions of the U.S. Uyghur Fair Labor Protection Act, the California Transparency in Supply Chains Act, the U.K. Modern Slavery Act 2015, Canada’s Forced Labour and Child Labour in Supply Chains Act, and the Netherlands’ Child Labor Due Diligence Law (2022). Ireland Protection of Young Persons (Employment) Act, 1996

■ OUR COMMITMENT Continued

- Reviewing and verifying the age of applicants and ensuring all relevant age verification documents meet the minimum requirements for documented evidence according to local laws and regulations.
- Requiring its supply chain partners to commit to respect Human Rights and adopt appropriate principles for ethical and responsible business conduct, as outlined in the Novolex Supplier Code of Conduct and included in Novolex supplier contract terms and conditions. Novolex reserves the right to conduct third-party audits of suppliers to verify compliance with this policy, request corrective actions, or terminate a supplier's contract, as necessary.

■ REMEDIATION

Novolex employees must report violations of this Policy. Employees are encouraged to share their questions, concerns, suggestions, or complaints related to this Policy or other matters with their manager or a member of the leadership team. If the employee is not comfortable speaking with their manager or member of the leadership team or is unsatisfied with the response, the employee should contact Human Resources and/or report their concern through the Novolex Ethics and Compliance Hotline.

Reports of potential violations of this Policy by employees, contractors or suppliers may be made online at ethics.novolex.com or by phone using the telephone numbers below.

The Ethics and Compliance Hotline is available 24/7 in multiple languages accessible by email or by telephone that can be reached through local numbers in each country in which Novolex operates. Reports to the hotline can be made confidentially.

USA and Canada	800-461-9330
Mexico	800-681-6945
Ireland	1800-904-177
Netherlands	0-800-022-0441
United Kingdom	0-808-189-1053

Investigations

Upon receipt of a complaint to the Ethics and Compliance Hotline, the Compliance Leader will acknowledge receipt of the reported violation. All reports will be investigated promptly. Failure to cooperate during the investigation or deliberately providing false information may subject an employee to disciplinary action up to and including termination of employment.

Confidentiality

Any reported complaints, allegations of violations of this Policy or retaliation will be investigated thoroughly, impartially, promptly and in confidence. All the information gathered during the investigation will be kept in the utmost confidence, subject to any legal requirements, and will only be disclosed on a need-to-know basis to substantiate a breach of this Policy.

No Retaliation

Novolex strictly prohibits and does not tolerate unlawful retaliation against any employee who in good faith raises a concern, violation of this Policy or any other Policies, or any other suspected violations of applicable law or regulations. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Disciplinary Action

Violation of laws, regulations and Novolex's policies can have severe consequences for the Company and the employee(s) that committed the violation. Such consequences could include, but not limited to, criminal or civil liability and/or termination from employment. In matters related child labor violations, if it is discovered that an employee is hired in violation of this Policy that employee will be dismissed immediately.

Training

Human Resources will conduct annual training on this Policy in combination with our Employee Code of Conduct.

Monitoring & Performance Assessment

The Compliance Leader will track and maintain a record of all complaints pertaining to violations of this Policy. On a quarterly basis, the Compliance Leader will provide to the Board of Directors and Novolex officers a report of all complaints and violations of this Policy.

Right to Terminate or Amend Policy

Novolex reserves the right to modify, suspend, change, or terminate this Policy at any time, in accordance with local law. This policy does not create any contractual or legal rights or obligations, whether expressed or implied. Subject to local law, the English-language version will prevail.

■ RELATED POLICIES

- Employee Code of Conduct
- Employee Handbooks (Salary & Non-Exempt)
- Diversity, Equity, and Inclusion Policy
- Equal Opportunity Statement
- Ethics and Integrity Speak-Up Policy
- Supplier Code of Conduct
- Modern Slavery Statement
- Equal Opportunity Statement



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