



# Code of Conduct

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# a word from Stan Bikulege



## Dear Novolex Family,

As our company continues to transform, one thing will never change; we will always act with integrity and **do what's right**. Our reputation is built not only on what we achieve, but on how we achieve it. At Novolex, ethics and integrity guide every decision and every interaction because they reflect who we are as an organization.

Our Code of Conduct represents a shared commitment to one another, to our customers and to our communities. It shapes how we work together, supports us in making sound decisions, and holds us accountable to our values:

### Our Values



**champion  
safety**



**celebrate  
people**



**do what's  
right**



**win  
together**



**make tomorrow  
better**

I encourage you to read our Code of Conduct carefully, understand it fully, and use it to guide your daily decisions and actions.

While the Code of Conduct covers many topics, it is not your only resource. Our policies and procedures offer additional support, as do your supervisor or manager. The HR and Legal teams are here to answer questions and help you navigate challenging situations. Because doing what's right matters, please speak up whenever you are unsure. And, in the rare instance you encounter behavior that does not meet our high standards, raise it to your supervisor or manager, HR or Legal, or report it through our Novolex Compliance Hotline. Your voice helps ensure we all live our values as **ONE Novolex**.

Thank you for your commitment to **do what's right**. Together, as **ONE Novolex** family, we fulfill our purpose of **Packaging for a Better Future through Choice, Innovation, and Sustainability**.

Thank you,

**Stan Bikulege**

Chairman & CEO

# the foundation for our code of conduct

## Our Purpose, Mission & Values

Our Purpose, Mission, and Values are at the heart of everything we do. They guide our actions, shape our culture, and unite our 23,000 family members. Together, they form the foundation of our Code of Conduct and the roadmap for our collective success.

### **Our Purpose:**

**Packaging for a Better Future through Choice, Innovation, and Sustainability.**

Our purpose is why we exist; it's the aspiration that drives our people and informs everything we do.

### **Our Mission:**

**Novolex delivers high-performance packaging for food, beverage, industrial and specialty markets, moving with relentless speed and agility to outpace customer expectations.** Our mission is how we achieve our Purpose by setting clear goals, operating with excellence, and making a meaningful impact for our Novolex families, customers, and stakeholders.

### **Our Values:**

**Champion Safety, Celebrate People, Do What's Right, Win Together, and Make Tomorrow Better.** Our values bring our purpose and mission to life. They unite us in making the right decisions, influence how we work together, and create a positive work environment where everyone can develop, lead, and win.



# scope & purpose of the code of conduct

The Novolex Code of Conduct (the “Code”) applies to Novolex Holdings, LLC, all of its subsidiaries and controlled affiliates (“Novolex” or the “Company”), and to all directors, officers, employees, and contingent or contract workers.

## The Code exists to help us:

- Live our values
- Support our mission & values
- Fulfill our purpose

It sets clear expectations for integrity, ethics, and professionalism in all of our interactions, including how we treat one another, how we work with customers and suppliers, how we compete in the marketplace, and how we engage with the public.

Our suppliers are also expected to uphold high standards through the Novolex Supplier Code of Conduct, which reflects many of the principles found in this Code.

Violating the Code can put Novolex, our employees, customers, and suppliers at risk of serious consequences. Because of this, violations of the Code are treated as misconduct and will be addressed promptly. Depending on the situation, consequences may range from coaching and warnings, to termination. In the most serious cases, violations of the Code may result in civil or criminal penalties for the Company or those involved.

# your responsibilities under the code

## How to Apply the Code to Everyday Decisions

Each of us plays a role in creating a culture of integrity and compliance. Every employee, including contingent and contract workers, is responsible for following the same principles and upholding the spirit and intent of the Code. The Company relies on your judgment, your values and your commitment to doing what's right. When you are faced with a decision and want to ensure your actions align with the Code, ask yourself:

- Do I have all the relevant facts and have I reviewed them carefully?
- Is my conduct consistent with the spirit and intent of the Code?
- Have I used the resources available to me, including seeking guidance from people with experience in this area?
- Have I considered all the issues and thought carefully about my options?
- Have I considered the possible consequences of my actions?
- If my conduct appeared in the news, would it reflect well on the Company and on me personally?
- Will my decision stand the test of time?
- Does this decision feel right and would I be proud of it?

## Raise Your Hand

Take the time to think things through before you act. No one has the authority to order, request or pressure you to violate this Code or the law. Similarly, no individual covered by the Code will be exempt from accountability for misconduct, even if acting under another person's direction.

You are encouraged to speak up if you see or suspect a potential violation of the law, any regulation, this Code, or a Novolex policy. Speaking up is not only the right thing to do; it is required by Company policy. You should report anything that seems wrong, even if the issue feels minor or you're unsure whether a violation has occurred.

Employees are protected from intimidation or retaliation for raising concerns in good faith. All reports will be reviewed and, where necessary, investigated.

Reporting concerns helps us improve as a Company. It allows us to address issues quickly, thoroughly, and responsibly – reducing risk and strengthening our culture of integrity.





# our code of conduct is anchored by eight principles

Our Code does not – and cannot – anticipate every situation you may face. Instead, it is anchored by eight guiding principles that provide a clear framework for acting ethically and with integrity at Novolex. These principles apply to all of us, in every role and in every location:

1. We obey the law
2. We avoid conflicts of interest
3. We are committed to health and safety
4. We keep accurate, complete, and honest records
5. We value our business relationships
6. We treat people with dignity and respect
7. We protect the company assets, confidential information, and reputation
8. We are responsible global citizens

These principles serve as everyday guidance for making sound decisions and upholding the trust placed in us as **ONE Novolex**.

# we obey the law

## General Expectations

Employees must adhere to the laws and regulations wherever we do business.

- If local laws are less restrictive than this Code, you must follow the Code.
- If local laws are more restrictive, you must follow both the law and the Code.

Acting legally and ethically is a shared responsibility, and no one is permitted to ask, pressure, or instruct you to break the law or violate this Code for any reason.

## We do not engage in improper payments or money laundering. Improper Payments (Anti-Bribery and Anti-Corruption)

All employees, officers, directors and third parties acting on behalf of Novolex must comply with:

- the United States Foreign Corrupt Practices Act ("FCPA")
- the United Kingdom's Bribery Act
- all other anti-bribery and anti-corruption laws where we conduct business

A bribe is defined as giving or offering something of value. Examples include gifts, entertainment, favors, commissions, credits, gift cards or job offers given to someone to gain or keep business or obtain any business advantage. A business advantage is broadly defined as trying to speed up or obtain an official action of any sort or delay a negative outcome.

You must never offer, promise, request, authorize or accept a bribe, kickback, or any improper payment. This applies everywhere, regardless of local customs or traditions.

## Special Situations to Consider Carefully

### Entertainment & Hospitality

- Never give or receive extravagant gifts, meals, or entertainment.
- Never give cash or cash equivalents (including gift cards).
- Gifts must be modest, reasonable, transparent, and aligned with Company policy.
- All expenses must be properly recorded, including the recipient, business purpose, and date.
- When in doubt, ask HR or Legal before proceeding.

## Government Officials

Interactions with government officials require extra caution because of higher corruption risks. Government officials include:

- elected or appointed officials
- employees of government agencies
- employees of state-owned enterprises
- officials of multinational organizations (e.g., United Nations, World Bank)

Always consult the Legal Department before conducting business with any government official or government-owned entity.

## Third-Party Due Diligence

We are responsible for the actions of consultants, agents, suppliers, brokers, joint venture partners, lawyers, and others acting on our behalf.

- Only work with third parties who act legally and ethically.
- Only Company-authorized individuals may negotiate binding agreements.

## Money Laundering

Novolex prohibits any activity that could be used for money laundering. Employees must not accept or provide cash payments for products or services.

## We compete fairly.

Healthy competition benefits customers, employees, and the marketplace. Antitrust and competition laws protect fair competition by prohibiting practices like price fixing and dividing markets.

Violating these laws can result in severe penalties, including large fines, personal liability, and imprisonment.

## Antitrust, Sales Practices & Competitive Information

Never engage in any conduct that reduces or restricts competition. Specifically:

- Never agree with competitors on prices, market division, or other practices that limit competition.
- Never agree (formally or informally) with a competitor on restricting sales, purchases, or production.
- Never agree with a customer to limit their ability to use or resell our products without Legal's approval.
- Never condition the sale of one product on the purchase of another without Legal's approval.
- Remember - an "agreement" can be implied through conversation or behavior, even without a formal or written agreement.



## Industry Associations

Industry groups can be useful, but they present antitrust risks.

- Participation must be approved by your manager and vetted through Legal and Government Affairs.
- If discussions move into anticompetitive areas, you must clearly object.
- If the conversation does not immediately return to appropriate topics, you must leave the meeting and request your departure be noted.
- Memberships involving public policy or sustainability must be coordinated with Legal and Government Affairs.

## We comply with all export and boycott laws.

**Exports of Goods and Technology.** Laws in countries where Novolex does business regulate the export or re-export of certain goods and technology. Before exporting or re-exporting items, consult the Office of International Trade Compliance to determine whether export licenses or approvals are required.

## Sanctioned Countries and Parties

The U.S., EU, and other jurisdictions restrict business with certain countries, entities, and individuals.

- Before beginning any business relationship, ensure all parties are screened and approved.
- U.S. sanctions prohibit nearly all activity involving the Crimea, Donetsk and Luhansk regions of Ukraine, Cuba, Iran, Sudan, and North Korea. Other countries may be subject to more limited sanctions.
- All screening must be coordinated through the Office of International Trade Compliance.

## Anti-Boycott Laws

U.S. law prohibits cooperating with foreign boycotts. If you receive any boycott-related requests, contact Legal immediately.

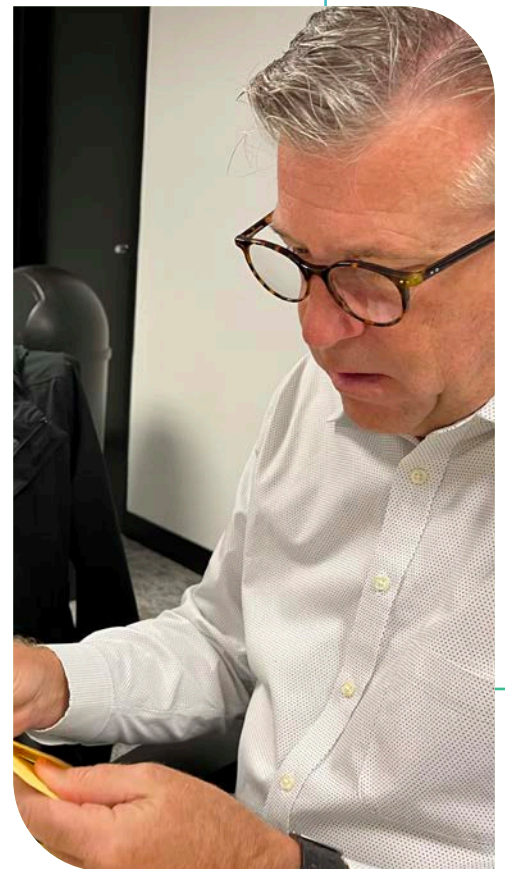
## We do not engage in insider trading.

Even though Novolex is not publicly traded, insider trading laws still apply.

Employees must never buy, sell, or recommend securities based on material nonpublic information (MNPI), whether that information relates to Novolex or to our customers, suppliers, or business partners.

MNPI is information a reasonable investor would consider important when deciding to buy or sell securities.

Sharing MNPI with others (“tipping”) is illegal and strictly prohibited.





# we avoid conflicts of interest

A conflict of interest occurs when your personal activities, investments, or relationships interfere with, or appear to interfere with, the best interests of the Company. Business decisions must always be based on what is right for Novolex, not on personal gain or the interests of family or friends.

If you believe you may have a conflict of interest, or even the appearance of one, you must disclose it to HR and Legal so it can be reviewed and addressed.

## **Outside Employment (“Other Jobs”)**

Your primary work obligation is to Novolex.

- Second jobs or self-employment must not interfere with your responsibilities at Novolex.
- Personal businesses must not be run on Company time or with Company resources.

## **Business Opportunities**

Any business opportunity you learn about or develop using Company resources belongs to Novolex.

You are expected to advance the Company’s legitimate business interests and must not use these opportunities for personal benefit.

## **Working for a Competitor or Customer\***

You should avoid:

- Working for a competitor, customer, or supplier
- Serving on their board
- Owning a direct or indirect financial interest in them
- Lending or borrowing money from them

\*Some employees may have agreements that contain specific restrictions.

If you or even your family members engage in any of these activities, disclose it to Legal to ensure there is no conflict or appearance of one.

## Personal Relationships

- Romantic or intimate relationships between employees in the same reporting line are prohibited. If such a relationship develops, you must inform HR immediately so the conflict can be resolved.
- Nepotism and/or family members working in a direct reporting relationship is strongly discouraged and must be disclosed so the conflict can be addressed.

## Former Novolex and Government Personnel

Additional caution is required when:

- Recruiting or doing business with former Novolex employees or Board members
- Hiring or engaging current or former government officials
- Employees seek or hold public office

Always consult Legal before making any commitments in these situations.

## Political Contributions and Activities

Before engaging in any political activity on behalf of Novolex (including lobbying, donations, or public positions), you must receive approval from Legal.

Without explicit authorization:

- The Company's name and resources must not be used for political purposes.
- No political position should be attributed to Novolex or its employees.

Employees are free to make personal political contributions or engage in political activities on their own time and at their own expense. You cannot be reimbursed, directly or indirectly, for personal political contributions.

Any contact with elected or public officials on behalf of the Company is regulated and must be coordinated with Legal and Government Affairs.





# we are committed to health & safety

Novolex values the health and safety of its employees above all else. Our goal is simple: every person who enters our facilities should leave in the same condition in which they arrive.

We champion safety by following all workplace safety laws, regulations, policies, and procedures, and by looking out for one another.

To support our commitment to Health and Safety, employees must follow these principles:

- **Always follow your facility's safety rules and procedures.** Before starting any task, make sure you understand the safe way to perform it. If you're unsure, ask first.
- **Take the right safety precautions at all times,** including using required protective equipment and wearing seat belts when driving or riding in Company vehicles.
- **Never compromise your safety** by cutting corners or skipping required steps. Your personal safety and well-being is our top priority.
- **Report any "near miss," injury, or illness** to your supervisor as soon as possible. Near misses help us identify risks and prevent future accidents.
- **Look out for one another.** Speak up politely if you see a coworker taking a risk or forgetting a safety step.
- **If a safety issue is not resolved, escalate it** to the Corporate Environmental, Health and Safety team, or report it through the Novolex Compliance Hotline.

A strong safety culture depends on all of us. By following these principles, we create a workplace where everyone can work confidently, safely, and with peace of mind.

# we keep accurate, complete, and honest records

Accurate, complete, and honest records are essential to running our business responsibly. Every employee plays a role in ensuring that our records reflect the truth and comply with applicable laws and Company policies.

## Creating and Managing Business Records

All communications you create or receive about Novolex business are considered business records. This includes (but is not limited to):

- emails, text messages, and notes
- phone calls and voicemails
- expense reports and time sheets
- service and laboratory reports
- financial statements and audit materials
- invoices, contracts, and inventory summaries
- reports to government agencies

You are responsible for maintaining all records in accordance with relevant Novolex document retention policies and ensuring they accurately reflect the true nature of the transactions or events they describe.

### You must never:

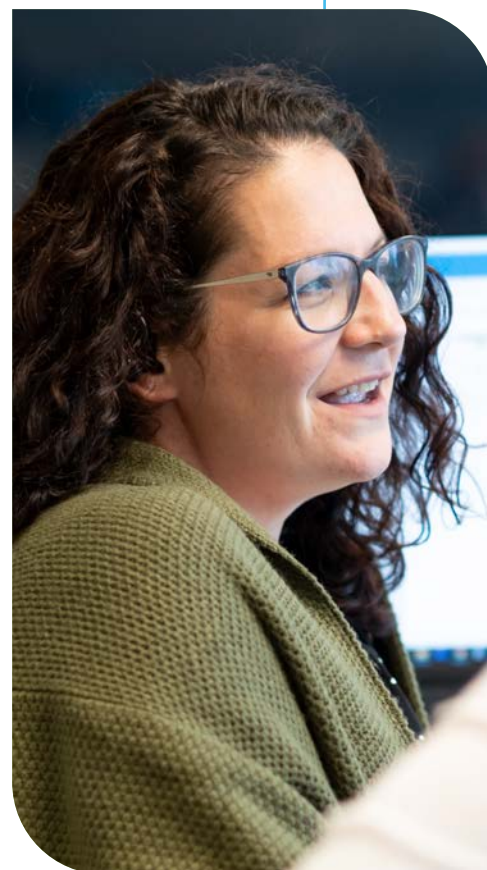
- falsify, alter, or hide information
- misrepresent what happened
- use exaggeration or language that could be misleading
- draw legal conclusions in your notes or emails

## Document Retention

All records must be retained according to the relevant Novolex document retention policies. However, even if a record could normally be discarded, you must not destroy it if it relates to:

- pending, threatened, or expected litigation
- an audit or investigation
- a legal hold issued by the Company

When in doubt, ask Legal.



## Financial Statements and Controls

Our shareholders, lenders, customers, and business partners rely on the accuracy of our financial information. Novolex complies with U.S. GAAP and all applicable federal, state, and international financial reporting and tax laws.

To meet these obligations, employees must follow these guidelines:

## Transparency and Accuracy

- All financial and tax information must be timely, complete, fair, and accurate.

## Documentation

- Every payment must be supported by proper documentation.
- Never create or maintain undisclosed or “off-the-books” accounts or assets.
- Never falsify invoices or approve payments that are unusual, excessive, unclear, or poorly documented.

## Time Recording

- Non-exempt (e.g., hourly) employees must record time and expenses honestly and accurately.
- Novolex does not allow “off the clock” work under any circumstances.
- Never falsify your own time records or those of another employee.

## Government Reporting

Providing false information to a government agency, including false invoices or certifications, is illegal and may result in severe civil or criminal penalties for both you and the Company.



# we value our business relationships

Strong business relationships are essential to our long-term success. We maintain these relationships by communicating honestly, protecting confidential information entrusted to us, fulfilling our commitments, treating suppliers fairly, and never misrepresenting facts for personal or business gain.

## Customers

Our customers rely on us, and we must honor that trust.

- Only make commitments you believe Novolex can meet.
- Think carefully before you promise something; do not commit to deliverables or timelines the Company may not be able to achieve.
- If a commitment may be delayed or impacted, inform the customer promptly and professionally.
- Accurately record all performance criteria and requirements provided by the customer.

## Suppliers, Sales Representatives, Consultants and Other Third Parties

Novolex selects and works with third parties based on fairness, integrity, and objective factors such as quality, price, reputation, and past performance.

- Use objective criteria when evaluating suppliers, brokers, sales representatives, consultants, or attorneys.
- Competitive bids should be obtained where appropriate and reasonable.
- Evaluate all proposals fairly and consistently.
- Conduct proper due diligence, including screening through approved third-party databases, before engaging new suppliers or contractors.

By treating our customers and partners with honesty and respect, we build strong, lasting relationships that help our Company and our stakeholders succeed.





# we treat people with dignity and respect

A respectful environment enables each of us to perform at our highest level and work together as ONE Novolex.

We value a workplace where every person is treated with dignity and respect. A respectful work environment is not only free from unlawful discrimination and harassment, but also from unprofessional or inappropriate behavior of any kind. Bullying, threats, intimidation of violence, and violence have no place at Novolex. Respect enables people to do their best work, support one another, and contribute to our success as ONE Novolex.

## **We don't tolerate discrimination.**

Novolex prohibits discrimination on the basis of sex, gender, gender identity, race, color, creed, nationality, citizenship, ethnicity, age, marital status, disability, religion, political affiliation or opinion, sexual orientation, socioeconomic status, or any other characteristic protected by international, federal, state, or local law.

We strive to provide a workplace where:

- everyone can grow and contribute
- individuals are treated fairly
- diverse perspectives are encouraged and valued

Different viewpoints and backgrounds make us stronger and improve problem-solving across the Company.

## **We do not engage in harassment.**

Harassment can take many forms. All are unacceptable. Below are examples of prohibited conduct:

- Jokes, insults, threats, or unwelcome comments about someone's protected characteristics
- Sexual harassment of any kind, including unwanted advances, sexual comments, or requests for sexual favors
- Displaying offensive or sexually suggestive images or objects

- Comments or conduct suggesting an employee’s job, advancement, or assignments depend on accepting inappropriate requests or tolerating inappropriate behavior
- Verbal or physical conduct that interferes with someone’s ability to do their job or creates a hostile work environment (e.g., bullying, intimidation or violence)

At Novolex, every employee has the right to work free from harassment and discrimination, and every employee is responsible for contributing to a respectful environment.

## **We maintain a drug- and violence-free workplace.**

### **Drug-Free Workplace**

Employees must work free from the influence of controlled substances, including alcohol. Misuse of controlled substances can endanger your safety, the safety of others, and the integrity of our products.

Employees may not possess, use, or distribute controlled substances while:

- at work
- on Company premises
- conducting Company business

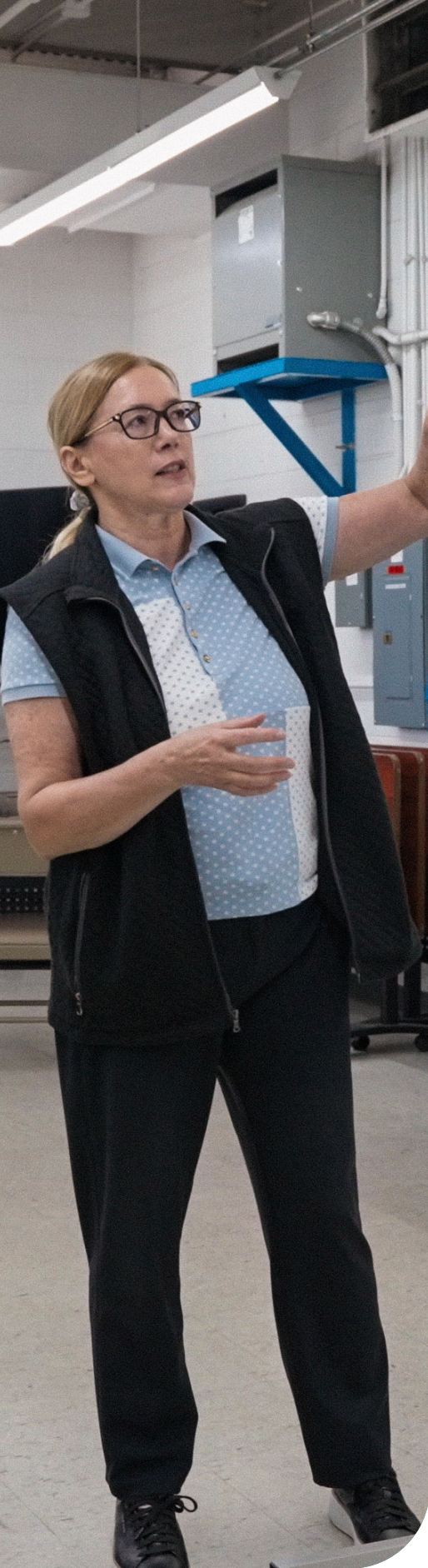
### **Violence-Free Workplace**

Novolex has zero tolerance for threats or acts of violence. This includes:

- threatening or aggressive behavior
- physical harm or attempts to harm others
- damaging property
- any conduct that causes someone to fear for their safety

To the greatest extent permitted by law, the Company prohibits explosives, firearms, and other dangerous materials in its facilities.





# we protect the company's assets, confidential information and reputation

Every employee has a responsibility to protect Novolex assets. This includes preventing loss, damage, theft, waste, or misuse. Treat Company assets as you would your own – handle them carefully and use them only for legitimate business purposes.

Our assets include both physical property (facilities, equipment, inventory, supplies) and intangible assets (business plans, trade secrets, data, software, technology, and other confidential or proprietary information). Do not copy, share, or remove Company property from Novolex premises unless you are expressly authorized in writing.

## **Use of Company Resources**

Use Novolex resources for Company business only, unless you are specifically authorized in writing by your manager. Never use Novolex resources for personal gain or for illegal or unethical activities.

Limited personal use of communication tools (email, Internet, phone, etc.) is permitted but must not interfere with job performance.

## **Electronic Communications**

Novolex provides digital tools and systems so employees can work efficiently, effectively, and securely. All electronic information created, received, or stored on these systems is Company property and must be handled according to Novolex policies.

Important requirements:

- Company information on personal devices (e.g., texts, emails) is still considered Company property.
- Do not store Company files, particularly confidential, privileged or sensitive documents, on personal devices, drives, apps, or cloud services.

- Protect electronic tools from theft, loss, damage, and misuse.
- Novolex may access Company-related electronic information on any device at any time, where permitted by law.

## Mobile Phones

Hands-on talking or texting while driving for Company business is prohibited, even in places where local law allows it.

## Traditional and Social Media

Only authorized Novolex spokespersons or designees may speak on behalf of the Company to the media or post original content on Company social media channels. Employees may re-share official Novolex content on personal accounts.

## Personal Social Media

Employees have the right to share their personal views online but must follow all applicable Company policies when making statements on social media concerning the Company and its employees, customers and competitors.. This includes policies on:

- anti-discrimination and anti-harassment
- workplace violence
- confidential information and trade secrets

If information cannot be shared in a conversation, email, or memo, it also cannot be shared online.

Any conduct about Company business or colleagues that would be inappropriate or illegal at work is also inappropriate on social media.

## Confidential and Proprietary Business Information

You must not disclose confidential or non-public information. Unauthorized disclosure could harm Novolex, damage relationships, or benefit competitors.

Confidential information includes (but is not limited to):

- financial and operational results
- manufacturing techniques and R&D information
- pricing and investment strategies
- customer lists, vendor data, sales and marketing plans
- business plans, forecasts, M&A information
- intellectual property and new product information
- litigation matters or claims
- private employee information (e.g., SSNs, bank info, medical data)



Protection of confidential information does not restrict employees from discussing their wages, hours, or other terms and conditions of employment.

## Intellectual Property

Intellectual property, including copyrights, patents, trademarks, trade secrets, inventions, and know-how, is a critical asset. Novolex owns all intellectual property created by employees on the job and/or using Company resources.

Employees must:

- protect intellectual property
- use it only as authorized
- never copy or distribute copyrighted materials without permission
- use only properly licensed software
- return all confidential, privileged or sensitive materials when requested or upon leaving the Company

## Third-Party Confidential Information

During your work, you may receive or learn confidential information from customers, suppliers, or other partners. This information is often protected by a confidentiality or non-disclosure agreement.

Treat third-party confidential information with the same level of protection you give to Novolex information.



# we are responsible global citizens

Novolex is committed to operating responsibly, ethically, and sustainably in every community where we live and work. Being a responsible global citizen means respecting human rights and the environment, supporting our communities, and ensuring our operations meet the highest standards of fairness and integrity.

## **We respect the human rights of others.**

Novolex upholds internationally recognized human rights standards, including:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises

These principles also are reflected in our Supplier Code of Conduct.

## **No Forced Labor, Human Trafficking or Modern Slavery**

We strictly prohibit:

- forced labor, bonded labor, or involuntary work
- human trafficking or modern slavery
- violence, threats, confinement, or physical punishment of any kind
- psychological or verbal abuse
- weapon use or intimidation in the workplace

Prison labor is permitted only where workers participate lawfully, willingly, and receive fair compensation under reasonable working conditions.

## **No Child Labor**

Novolex strictly prohibits child labor. If a country does not define a minimum employment age, or if the legal minimum is below 18, the minimum age for work on Novolex products will be considered 18 years old.



## We Respect Indigenous Communities

We recognize the unique history, culture, and rights of Indigenous peoples, including their deep ties to land, water, and the environment. We strive to engage respectfully with Indigenous communities where we operate, seeking to:

- understand the local impact of our activities
- enhance community benefits
- minimize adverse effects

## We Support Inclusion and Accessibility

Novolex is committed to a workplace where all people, including those with disabilities, can participate fully. In compliance with all applicable laws, we provide:

- reasonable accommodations
- equal access to resources and opportunities
- wages and benefits that comply with applicable laws

## Fair Working Conditions

Our policies require that:

- working hours follow all legal requirements
- employees receive rest breaks, bathroom access, rest areas, potable water, and time off work
- overtime is voluntary except where business needs require otherwise
- wages and benefits meet or exceed legal standards

We also respect the rights of employees to:

- freely associate
- choose or decline union representation
- engage in collective bargaining



## Respecting the Environment and Promoting Sustainability

Environmental responsibility is a core part of our identity. We are committed to designing, manufacturing, and marketing our products in ways that protect the environment and **Make Tomorrow Better**.

Every employee plays a role in managing our environment by working to:

- lower greenhouse gas emissions and energy use
- optimize water consumption
- reduce waste
- reuse and recycle materials wherever feasible
- handle and dispose of waste safely and responsibly

We also:

- support sustainable forestry
- increase the use of certified wood
- avoid deforestation
- design products with their end-of-life in mind to support a circular economy
- obtain and maintain required environmental permits
- follow all environmental laws and respond truthfully when asked about our environmental practices

## Charitable Contributions

Novolex encourages employees to support and engage with their local communities. Across our Company, employees contribute by:

- feeding the hungry
- supporting people experiencing homelessness
- raising funds for medical research
- serving as first responders and volunteer firefighters

Our corporate charitable giving program oversees Company donations, including:

- product donations
- volunteer initiatives
- monetary contributions to qualified nonprofit organizations

All charitable commitments using Company resources must be coordinated through this program. The Company does not make charitable donations to political or religious institutions.





# we all have a duty to speak up

Speaking up when something doesn't seem right protects Novolex, our colleagues, and our stakeholders. We all share responsibility for maintaining a culture of integrity. The Company relies on you to report in good faith any actual or potential violation of laws, regulations, policies, procedures, or this Code.

## You can report a concern in any of the following ways:

- Your supervisor or manager
- Human Resources
- Legal
- Novolex Compliance Hotline
  - Web: [novolex.ethicspoint.com](http://novolex.ethicspoint.com)
  - Phone: U.S. 833-945-5060  
Mexico 800-099-6529  
Canada 833-946-0312

The Novolex Compliance Hotline is operated by a third-party and is available 24 hours a day, 7 days a week. Reports may be made anonymously, and we take all appropriate steps to keep reports and investigations confidential, except where disclosure is required by law or necessary to conduct an investigation.

Discouraging someone from reporting a concern, or from getting help, is strictly prohibited and may result in disciplinary action.

## Retaliation is Not Permitted

Novolex strictly prohibits retaliation against anyone who raises a concern in good faith, whether the concern turns out to be accurate or not. Reporting concerns is an important part of maintaining a safe and ethical workplace.

However, intentionally making false reports, attempting to harm someone's reputation, or using the Novolex Compliance Hotline to threaten or retaliate against others is misconduct and will result in disciplinary action.

## Reporting Outside of the Company

You also have the right to report possible violations of law to a government agency or self-regulatory organization, cooperate with their investigations, or respond to a subpoena.

As long as you reasonably believe the information you report is truthful, the Company cannot retaliate or discipline you for such reporting.



