



# **Policy on Human Rights**



## Effective Date

May 2021

## Novolex Policy on Human Rights

This Human Rights Policy (the "Policy") represents Novolex's responsibilities, commitment and expectations with regard to respect for human rights across our business activities and relationships. Novolex is committed to engage in responsible business practices and ethical conduct in every aspect of our business. The foundation for ensuring we live up to our commitment is the way we treat our people and respect fundamental human rights. Novolex supports a workplace in which employees can grow, contribute and participate free from discrimination and differential treatment. We value our diversity, reaping unique contributions from colleagues and allowing each other to strive for their own individual potential.

Respect for human rights starts with zero tolerance for the use of child or illegal, abusive and forced or bonded labor and human trafficking in our workplaces. Novolex abhors such practices and has in place a variety of human resources practices to safeguard a respect for human rights among other employee health, safety and fair labor practices in our workplace. Our human rights principles are embedded in the *Novolex Employee Code of Conduct*. All employees are made aware of and required to sign the Code when they join Novolex. Thereafter, employees must acknowledge the Code annually and are responsible for understanding and supporting human rights across Novolex.

This Policy is guided by globally recognized declarations and covenants including core International Labor Organization (ILO) conventions, the UN Declaration on Human Rights, the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. Novolex also complies with provisions of the UK Modern Slavery Act of 2015 and The California Transparency in Supply Chains Act, 2012, as explained in the *Novolex Statement on Human Trafficking and Anti-Slavery* available on the Novolex website.

Novolex expects suppliers, vendors and other contractual relationships to share the Company's commitment to respect human rights and adopt appropriate principles for ethical and responsible conduct in their workplaces. We encourage suppliers to apply these standards to their own supply chains. Our expectations of suppliers are explained in the *Novolex Supplier Code of Conduct* and included in Novolex contract terms and conditions. Through our due diligence programs, we seek to identify and assess potential adverse human rights risks within our workplace and supply chain.

If we suspect human rights abuses or have reason to believe suppliers are not adhering to the *Novolex Supplier Code of Conduct*, the Company will take action until we are confident concerns related to human rights have been remedied. The Company reserves the right to conduct third-party audits of suppliers to verify compliance with Novolex standards and promote corrective actions or terminate a supplier's contract, as necessary.

As part of the Novolex commitment to responsible and ethical business conduct, we provide Novolex employees, as well as our suppliers, their employees and the public with access to the Novolex Ethics & Compliance Helpline via a link on the Novolex website. The Helpline can be used to report potential violations of the employee or supplier code without fear of retribution. Reports made through the Helpline can remain anonymous and confidential.