
Novaled Code of Conduct

Revision 2, dated 30.05.2016

The Code of Conduct expresses Novaled highest standards concerning responsible management of social, ethical and environmental issues within the Company and the international supply chain. This ethical trading policy of Novaled is guided by both the industry and international standards. At Novaled it is everyone's responsibility and an integral part of managing Novaled's business.

Legal compliance

We

- comply with all applicable national and international laws
- always perform a fair, transparent and free competition in the domestic and overseas markets with reasonable and lawful business transactions
- do not participate in acts that may damage the reputation of Novaled or may be morally criticized

Prevention of corruption and bribery

We

- do not tolerate as well as are not engaged in any form of corruption or bribery, including payments or other form of benefit for the purpose of influencing decision making
- comply with accurate business booking and accounting and tax item recording and have adequate procedures implemented
- do not embezzle Novaled's asset(s) and/ or do not use it for personal gain

Protection of customer interests

We

- value customers' assets, intellectual properties and proprietary information as preciously as those of Novaled's own
- do not infringe upon the interests through unethical or illegal activities have adopted the Electronic Industry Citizenship Coalition (EICC) [Code of Conduct](#) in order to support our customers in the Electronics Industry for a responsible, trustful and reliable partnership

Protection of Company's intellectual property rights and confidential information

We

- protect the Company's intellectual property rights, especially outcomes of research and development
- do not disclose confidential information to any person(s) without justifiable reasons and do not use it for any personal gain or interest of a third party
- fully respect the intellectual property rights and confidential information of a third party
- comply with internal regulations on Information Security

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Respect for the basic human rights

We

- respect the human dignity, privacy and rights of each individual as well as each other's opinion;
- promote equal opportunities for the employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age; including but not limited to hiring, promotion and evaluation period
- refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination
- refuse to employ or make anyone work against his will
- provide fair remuneration and guarantee the applicable national statutory minimum wage;
- comply with the applicable national and international laws in terms of maximum number of working hours;
- recognize, as far as legally possible, the right of free association of employee;
- ensure that all personal data collected, stored, processed, transmitted and shared by Novaled will be processed fairly, lawfully and carefully in order to protect the privacy and rights of individuals.

Prohibition of child labor

We employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.

Health and safety of employees

We

- take responsibility for the health and safety of our employees;
- control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- ensure that employees are educated in health and safety issues and are therefore empowered and engaged to always comply with all internally set safety standards;
- set up or use a reasonable occupational health & safety management system compliant with laws, regulations and Novaled internal policies

Environmental policy

We are committed to ensure minimal environmental impact of our business, especially our research activities and commercial products. This is accomplished by a strong commitment towards

- Compliance with National and International environmental legislations and regulations
- Keeping the track on continuous improvements in waste reduction, energy saving and recycling approaches

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- Replacement activities for environmental banned and hazardous reagents in chemical research
- Compliance of Novalied's products with general industry requirements (e.g. RoHS, halogen-free according to IEC 61249-2-21, REACH)

Supply chain

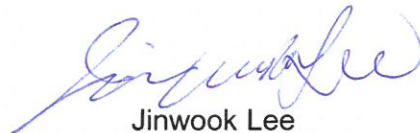
We

- comply with the principles of nondiscrimination with regard to supplier selection and treatment.
- pursue cooperation with our partners by means of engaging in good faith and fair transactions
- do not purchase, manufacture or sell conflict minerals, including Tantalum (Ta), Tin (Sn), Tungsten (W) and Gold, that are sourced from the Democratic Republic of Congo (DRC) and adjoining countries and we will ensure that we have not and will not supply such minerals to Novalied's domestic/ overseas production sites and facilities/ material manufacturers.

We expect all of our suppliers and other business partners to agree with the ethical stance outlined in this Code of Conduct and to commit to continuous improvement.



Gerd Günther
CEO



Jinwook Lee
COO