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## **Novaled Code of Conduct**

Revision 3, dated November 15<sup>th</sup>, 2020

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**This Code of Conduct expresses the highest standards of Novaled GmbH (“Novaled”) concerning responsible management of social, ethical and environmental issues within Novaled and the international supply chain. This Code of Conduct is an ethical trading policy of Novaled guided by the industry and international standards.**

### **Legal compliance**

We herewith declare to

- 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;
- not participate in acts that may damage the reputation of Novaled, or of any of its customer, suppliers or other business partners or may be morally criticized.

### **Prevention of corruption, bribery and money laundering**

We herewith declare to

- 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 in violation of law; in particular, we
  - make donations and sponsoring activities within the frame of internal regulations;
  - accept and grant benefits (gifts and/or invitations for dinners and events) within the frame of internal regulations;
- comply with accurate business booking and accounting and tax item recording and have adequate procedures implemented;
- not embezzle Novaled’s asset(s) and/ or do not use it for personal gain;
- fulfill legal obligations to prevent money laundering and not participate in money laundering activities;
- carefully check the identity of our business partners to maintain business activities within the frame of internal regulations.

### **Protection of customer interests**

We herewith declare to

- value customers’ assets, intellectual properties and proprietary information with the same degree of care as those of Novaled’s own;
- comply with the Responsible Business Alliance (RBA), formerly the Electronic Industry Citizenship Coalition (EICC), [Code of Conduct](#) (“Code”) and have implemented management system standards in accordance with the Code in order to support our customers in the electronics industry for a responsible, trustful and reliable partnership and to ensure safe, respectful and dignified working conditions and supply chains in the electronics industries that business operations are environmentally responsible and conducted ethically.

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### **Protection of intellectual property rights, personal data and confidential information**

We herewith declare to

- protect Novaled's intellectual property rights and confidential information, especially outcomes of research and development as set out in internal regulations;
- 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 as set out in internal regulations;
- fully respect the intellectual property rights and confidential information of a third party;
- collect or process personal data only where permitted by law or with the consent of the person concerned.

### **Respect for the basic human rights**

We herewith declare to

- respect the human dignity, privacy and rights of each individual as well as each other's opinion;
- promote equal opportunities for the employees and applicants 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 and collective bargaining.

### **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 and ensure the health and safety of young workers, precluding them from hazardous and night work.

### **Health and safety of employees**

We herewith declare to

- take responsibility for the health and safety of our employees and external service providers who have access to our facilities;
- control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
- ensure that employees and external service providers who have access to our facilities are educated in health and safety and comply with all internally set safety standards;
- have set up and use a reasonable occupational health & safety management system compliant with laws, regulations and Novaled internal policies.

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### Environmental policy

We herewith declare to

- ensure minimal environmental impact of our business, especially our research activities and commercial products
- comply with applicable environmental regulations
- continuously track improvements in waste reduction, energy saving and recycling approaches;
- have set up and use a reasonable system for replacement activities for environmental banned and hazardous reagents in chemical research;
- comply with general industry requirements (e.g. RoHS, REACH, halogen-free according to IEC 61249-2-21).

### Supply chain

We herewith declare to

- 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 Novaled's domestic/ overseas production sites and facilities/ material manufacturers;
- comply with applicable regulations on imports, exports, customs and transits of products purchased or sold, in particular, before engaging with new business partners, we carefully check that there is no respective entry on any national or international sanctioned party lists and if export/re-export licenses from authorities are required, as set out in internal regulations.

We expect that this Code of Conduct shall apply to all of our subcontractors.



Gerd Günther  
Managing Director, CEO



Sangshin Lee  
Managing Director, CTO



Jaehong Choi  
Managing Director, CFO