

# **NovaTech Code of Ethics**

**Document ID:** COM-INT-001 **Effective Date:** January 1, 2024 **Last Updated:** January 2024 **Owner:** Legal & Compliance **Applies To:** All Employees, Contractors, Board Members

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## **Our Commitment**

NovaTech is committed to conducting business with the highest ethical standards. This Code of Ethics provides guidelines for ethical decision-making and reflects our values as a company.

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## **Core Values**

### **Integrity**

We are honest and transparent in all our dealings. We keep our commitments and admit our mistakes.

### **Respect**

We treat everyone with dignity and respect. We value diverse perspectives and foster an inclusive environment.

### **Excellence**

We strive for excellence in everything we do. We continuously improve and hold ourselves to high standards.

### **Accountability**

We take responsibility for our actions and their impact. We do what we say we'll do.

## **Innovation**

We embrace creativity and new ideas. We take thoughtful risks to drive progress.

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## **Ethical Guidelines**

### **Honesty and Integrity**

**Do:** - Be truthful in all communications - Honor your commitments - Report information accurately - Acknowledge mistakes and correct them

**Don't:** - Misrepresent facts or data - Make promises you can't keep - Falsify records or reports - Cover up errors or misconduct

### **Fair Dealing**

**Do:** - Compete fairly in the marketplace - Deal honestly with customers, vendors, and partners - Respect intellectual property - Honor contracts and agreements

**Don't:** - Engage in deceptive practices - Take unfair advantage of others - Misappropriate trade secrets - Spread false information about competitors

### **Conflicts of Interest**

**Potential conflicts include:** - Personal relationships with customers or vendors - Outside employment or business interests - Financial interests in competitors or suppliers - Family members working at related companies

**Required actions:** - Disclose potential conflicts to your manager - Seek guidance from Legal/Compliance - Recuse yourself from affected decisions - Document all disclosures

### **Confidential Information**

**Protect confidential information by:** - Sharing only with those who need to know - Using secure communication channels - Following data classification policies - Never discussing confidential matters publicly

**Confidential information includes:** - Customer data - Business strategies and plans - Financial information - Employee information - Trade secrets

## **Corporate Opportunities**

You must not:

- Take personal advantage of business opportunities discovered through NovaTech
- Use company property or information for personal gain
- Compete with NovaTech while employed

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## **Workplace Conduct**

### **Respect and Dignity**

We maintain a workplace where everyone is treated with respect:

- No discrimination based on protected characteristics
- No harassment of any kind
- No bullying or intimidation
- No retaliation against those who raise concerns

### **Health and Safety**

We are committed to a safe workplace:

- Follow all safety policies and procedures
- Report unsafe conditions
- Never work under the influence of drugs or alcohol
- Prioritize mental health and wellbeing

### **Diversity and Inclusion**

We value diversity and foster inclusion:

- Embrace different perspectives
- Ensure equal opportunity
- Challenge bias when you see it
- Create an environment where everyone can thrive

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## **Business Practices**

### **Anti-Bribery and Corruption**

NovaTech prohibits all forms of bribery and corruption:

- Never offer or accept bribes
- Never make facilitation payments
- Be cautious with gifts and entertainment
- Know your business partners

**Gifts and Entertainment:**

- Modest gifts may be accepted if customary
- Never accept cash or cash equivalents
- Entertainment must be reasonable
- When in doubt, decline and report

## **Antitrust and Competition**

We compete fairly and legally:

- Never agree with competitors on prices or markets
- Don't exchange competitive information with competitors
- Avoid exclusive dealing arrangements without legal review
- Consult Legal before industry association participation

## **International Business**

When doing business internationally:

- Comply with all applicable laws
- Respect local customs while maintaining our standards
- Follow export control regulations
- Understand and follow trade sanctions

## **Political Activities**

- NovaTech does not make political contributions
  - Personal political activities must be on your own time
  - Don't use company resources for political purposes
  - Don't suggest company endorsement of political positions
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## **Protecting Company Assets**

### **Physical Assets**

- Use company property responsibly
- Protect equipment from theft and damage
- Report lost or stolen items
- Return property when leaving the company

### **Intellectual Property**

- Protect NovaTech's intellectual property
- Respect others' intellectual property
- Understand what you've assigned to NovaTech
- Don't bring others' confidential information to NovaTech

### **Information Systems**

- Use technology resources appropriately
- Follow security policies

- Protect your credentials
- Report security incidents

## Financial Integrity

- Maintain accurate records
  - Follow expense policies
  - Never manipulate financial data
  - Report suspected fraud
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## Reporting and Compliance

### Speaking Up

If you become aware of potential violations:

1. **Report it.** Don't assume someone else will.
2. **Use available channels:** - Your manager - Human Resources - Legal/Compliance - Ethics hotline (anonymous): ethics.novatech.com
3. **Provide details.** The more information, the better we can investigate.

### Non-Retaliation

NovaTech prohibits retaliation against anyone who:

- Reports a suspected violation in good faith
- Participates in an investigation
- Refuses to participate in wrongdoing

Retaliation will result in disciplinary action.

### Investigations

When concerns are raised:

- All reports are taken seriously
- Investigations are conducted fairly
- Confidentiality is maintained to the extent possible
- Appropriate action is taken based on findings

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## Consequences

Violations of this Code may result in:

- Verbal or written warning
- Training or coaching
- Demotion or transfer
- Termination of employment
- Legal action

Severity of consequence depends on:

- Nature of the violation
- Whether it was intentional
- Whether it was repeated
- Impact on the company and others

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## **Your Responsibilities**

As a NovaTech team member, you are expected to:

1. **Read and understand** this Code
  2. **Follow** the guidelines and policies
  3. **Ask questions** when unsure
  4. **Report concerns** when they arise
  5. **Complete** required training
  6. **Acknowledge** annually
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## **Resources**

### **Questions and Guidance**

- Your manager
- Human Resources: hr@novatech.com
- Legal: legal@novatech.com
- Compliance: compliance@novatech.com

### **Reporting Concerns**

- Ethics Hotline: ethics.novatech.com (anonymous)
- Email: ethics@novatech.com
- Phone: 1-800-XXX-XXXX

### **Related Policies**

- Anti-Harassment Policy (HR-EMP-003)
  - Conflicts of Interest Policy (COM-INT-005)
  - Information Security Policy (IT-SEC-001)
  - Expense Policy (FIN-EXP-001)
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## **Acknowledgment**

By continuing employment at NovaTech, you acknowledge that you have read, understood, and agree to comply with this Code of Ethics.

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*This Code is reviewed and updated annually. Last review: January 2024*