

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

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.

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.

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

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

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

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

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.

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