

Global Code of Conduct for Suppliers and Agents

NOVA WERKE AG is a Swiss technology company with headquarters in Effretikon and subsidiaries in France, Germany and China. Our comprehensive range of services and innovative high-tech components and processes are designed for demanding applications and meet highest standards in terms of quality, reliability, standardisation and safety.

We develop state-of-the-art technologies and deliver clean, safe and competitive solutions in the fields of engine components, high-pressure technology and surface technology. We are committed to meeting the highest ethical standards and to adhering to the strictest requirements for conduct and compliance, and we do not tolerate any inappropriate business practices. This zero tolerance policy applies to our own employees as well as to our suppliers and agents.

The Global Code of Conduct for Suppliers and Representatives summarizes our expectations regarding conduct, practices and standards. All suppliers and agents must act ethically and responsibly and comply with all applicable laws and regulations, otherwise no business relationship can be established between us.

In order to keep the brand promise of Nova Werke AG and to be successful together, we need the support of our suppliers and agents.

Please sign and return the confirmation on page 8. Many thanks in advance for your cooperation. We look forward to continuing our good and successful cooperation with you.



Marco Schade
Chief Executive Officer

Content

1	Introduction.....	3
1.1	Purpose.....	3
1.2	Content, scope and applicability	3
2	Operate safely	3
2.1	Health, safety and environment	3
2.2	Responsible sourcing.....	3
3	Trusted to Deliver Excellence	4
3.1	Working with customers, suppliers, partners and communities.....	4
3.2	Conflict of interest	4
3.3	Accurate business records.....	4
3.4	Modern slavery and human rights.....	4
3.5	Fair pay and benefits	4
3.6	Diversity and inclusion	5
4	Act with integrity	5
4.1	Anti-bribery and corruption.....	5
4.2	Safeguarding our resources and respecting the confidential information of others.....	5
4.3	Export controls and import obligations	5
4.4	Competitive behaviour and antitrust.....	6
4.5	Preventing the facilitation of tax evasion	6
4.6	Lobbying and political support.....	6
5	Supplier and Agent commitment.....	6
5.1	Communication	6
5.2	Code adherence	6
5.3	Supplier/Agent ethical concerns.....	6
6	Non-compliance.....	7

1 Introduction

We set high standards for the way we do business. This Global Code of Conduct sets out minimum standards of behaviour and practices we require from our suppliers and agents.

1.1 Purpose

The Code specifies the minimum standards of behaviour Nova Werke AG requires of our suppliers and agents. The requirements identified in the Code are based on the principles of Nova Werke AG's Global Code of Conduct. The purpose of the Code is to communicate Nova Werke AG's requirements and expectations to the global supply chain; it is freely available to view and can be downloaded from our website (www.novaswiss.com). Suppliers and agents are required to adhere and comply with the principles set out in this document.

1.2 Content, scope and applicability

The Code is applicable to all suppliers and agents who supply products or services related to Nova Werke AG's contracts or purchase orders.

2 Operate safely

All suppliers must make proper provision for the health, safety and welfare of their employees, contractors, visitors and those in the community who may be affected by their operations. We expect suppliers and agents to comply with legal and industry requirements and seek to implement best practice in their industries.

2.1 Health, safety and environment

Safe operation management is a priority for us. Our vision is a working environment without accidents, injuries, work-related illnesses or incidents. We create a safe and healthy working environment that does not cause injury, work-related illness or environmental damage, and we prevent or limit the negative effects of our products and services as much as possible. We expect our suppliers and agents to take personal and collective responsibility for ensuring that we achieve our health, safety and environmental objectives. We also expect them to commit to risk management in this area and to proactively protect the health, safety and welfare of their employees, contractors, visitors and all those affected by their operations. Suppliers and agents must also operate with environmentally sound procedures and practices.

2.2 Responsible sourcing

Nova Werke AG is committed to responsible procurement of materials. The products delivered to us must consist of materials that have been responsibly procured and are "conflict-free" according to OECD guidelines, REACH and RoHS conform. If the 'product chain' of the delivered materials is "indeterminable" or otherwise unknown, the supplier is obliged either to obtain the relevant certifications or to stop using these materials.

3 Trusted to Deliver Excellence

We treat all our customers, suppliers and partners fairly and honestly. We expect our suppliers and agents to behave in the same way and only work with suppliers and partners whose values and conduct meet high ethical standards.

3.1 Working with customers, suppliers, partners and communities

We behave fairly and with integrity in the competition for orders. The selection of new suppliers and agents is only made after a thorough examination. We take appropriate measures to ensure that we only select those suppliers and agents whose corporate values and conduct meet high ethical standards. Suppliers and agents may only work with employees, agents, brokers, consultants, representatives, dealers, cooperation partners, contractors, suppliers, consortia and joint venture partners who meet our and their standards of reputation and conduct.

3.2 Conflict of interest

We avoid situations in which it might appear that conflicts of interest could influence our business decisions or our conduct or prevent us from acting in the best interest of Nova Werke AG. If we believe that there is a (potential) conflict of interest, we address this. There must also be no conflicts of interest in the companies of suppliers and agents. If they do occur, however, they must be resolved in an appropriate manner.

3.3 Accurate business records

We record our business transactions correctly and completely. Suppliers and agents must keep correct and complete records of their business transactions, too.

3.4 Modern slavery and human rights

We reject all forms of child labour and practices that are contrary to child development. Suppliers and agents must never use or promote practices that are contrary to child development. Suppliers and agents shall not employ children under the age of 15 or, in countries where compulsory education is longer, before the end of compulsory education. We believe that all employment relationships should be voluntary. Suppliers and agents must not use any form of involuntary labour, such as forced labour, prison labour, or bonded labour.

3.5 Fair pay and benefits

We know that skills, commitment and performance have to be fairly rewarded. The wages of the supplier and the agents must meet local minimum wage requirements. Overtime must be voluntary and adequately remunerated. Regular working hours and overtime must not exceed the legal limits.

3.6 Diversity and inclusion

We treat each other openly, honestly and politely. We expect our suppliers and agents to promote equal opportunities for all employees and to value diversity. We do not tolerate mobbing, harassment or unlawful discrimination. Harassment or discrimination against employees, including all forms of physical, verbal or psychological abuse, must not be tolerated.

4 Act with integrity

For the good reputation and long-term success of our company, it is essential to comply with high ethical standards of conduct and laws and regulations. We expect our suppliers and agents to behave ethically, comply with laws and industry standards, and implement best practices in their industries.

4.1 Anti-bribery and corruption

Our company tolerates neither bribery nor corruption. We will never offer, give or accept valuables or gifts if this is, or could be, considered as an inappropriate influence on business decisions. Suppliers and agents must conduct their business honestly, fairly and without any form of corruption or bribery. Suppliers and agents may only accept gifts or entertainment if this is disclosed transparently and is in compliance with the law. If gifts or entertainment are offered, it must not be made with the intention of unduly influencing business decisions, nor should it be interpreted as such. Suppliers and agents may not offer or make any accelerated payments.

4.2 Safeguarding our resources and respecting the confidential information of others

Our technologies, intellectual properties and confidential operational information are essential resources to our business and we protect them from unauthorized access, use and disclosure. We protect the confidential information in our possession, including data from customers, suppliers, joint ventures and others. We disclose this information only internally to the extent permitted and never externally without authorization. We will not attempt to obtain or use information from any other person or organization, including competitors, if we know that it is confidential or restricted. Suppliers and agents must protect our resources and information and ensure that all data and documents are kept secure. Suppliers and agents must keep confidential information confidential and must never use information they are not supposed to have. Suppliers and agents must enter into appropriate confidentiality or non-disclosure agreements to maintain our confidentiality and protect our internal information and intellectual property.

4.3 Export controls and import obligations

We are committed to compliance with export and import regulations, ordinances and procedures that apply to our company worldwide. When exporting goods or technology, suppliers and agents must comply with all applicable export regulations and obtain all necessary permits and approvals in order to enable rapid and compliant delivery of their products. If required for a permit or authorization, the supplier and agent must also have all necessary processes in place to allow access to export-restricted goods or technology only to authorized employees or other authorized persons.

4.4 Competitive behaviour and antitrust

We conduct our business in accordance with competition (antitrust) law. Suppliers and agents must comply with competition law (antitrust law) in the countries in which they have sites or to which they sell products. Suppliers and agents may not coordinate their market conduct with competitors or their own suppliers in a way that unlawfully restricts competition.

4.5 Preventing the facilitation of tax evasion

We will not knowingly assist our customers, suppliers or others to evade taxes, i.e. to pay lower or no tax fraudulently. Suppliers and agents must not approach us with the desire to assist them in any way in tax evasion. Suppliers and agents may only issue invoices and other contractual documents that correctly reflect the agreed business situation and do not contain false information. Suppliers and agents may not knowingly assist others in tax evasion.

4.6 Lobbying and political support

We are committed to lobbying only within the legal framework and to behave ethically in all interactions with governments, authorities and their representatives. Suppliers and agents must comply with applicable law in all forms of lobbying. We expect suppliers and agents to conduct themselves ethically in all interactions with governments, agencies and their representatives.

5 Supplier and Agent commitment

5.1 Communication

Suppliers and agents must make our "Global Code of Conduct" available to their employees.

5.2 Code adherence

Suppliers and representatives must comply with all aspects of the Global Code of Conduct of Nova Werke AG. We reserve the right to verify compliance with this Code of Conduct for suppliers and agents.

5.3 Supplier/Agent ethical concerns

We address any concerns or violations of the principles of this Code without fear of retaliation and expect the same from our suppliers and agents. Retaliation against anyone who openly raises concerns will not be tolerated. Suppliers and agents may raise questions or concerns by contacting their contacts at Nova Werke AG by telephone or e-mail. We will treat these concerns confidentially and, if desired, anonymously.

6 Non-compliance

Any non-compliance by the business partner with the rules set out in this Code of Conduct will be considered a serious breach of the agreements. In the event that the Business Partner does not correct this non-compliance, Nova Werke AG will terminate the cooperation with immediate effect.

February 2020

Confirmation of Supplier / Agent:

With my signature I confirm that I have received and understood the Code of Conduct of Nova Werke AG (February 2020 version).

Company: _____

Name, Surname: _____

Division/Function: _____

Date: _____

Signature and company stamp: _____

Suppliers are kindly asked to return this confirmation to their contact person in our purchasing department.

Agents are kindly asked to return this confirmation to their contact person in our sales department.