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## Introduction

At Novation Tech („Novation Tech“ or „Company“) we are aware of the urgent need for sustainable practices to address environmental challenges, while creating a positive impact on society and future generations. We believe that sustainability is not just an ethical responsibility but also an opportunity for innovation, growth, and long-term success. Bearing this in consideration, we are committed to implementing a comprehensive sustainability policy that integrates environmentally and socially responsible measures into our business activities („Sustainability Policy“). By embracing sustainable principles, we aim to drive positive change within our company, our supply chain, and the communities where we operate. Our ultimate goal is to create long-term value for our stakeholders while safeguarding the environment and ensuring a more sustainable future for generations to come.

## 0. SOCIAL RESPONSIBILITY

At Novation Tech we recognize and embrace social responsibility as an integral part of our Sustainability Policy. It is unequivocally evident that the prosperity and longevity of any organization are intricately linked to its contribution towards the well-being of society. Through a comprehensive and transparent approach to social responsibility, we prioritize addressing the needs and concerns of our stakeholders, including employees, customers, communities, and the environment. By actively engaging in practices that foster inclusivity, diversity, fair labor practices, ethical sourcing, and community development, we demonstrate our steadfast commitment towards a sustainable future.

## **1. HUMAN RIGHTS AND WORKING CONDITIONS**

*Child labour and young workers; Health and Safety; Wages and benefits; Working hours; Modern slavery (i.e. slavery, servitude and forced or compulsory labour and human trafficking); Ethical recruiting; Freedom of association and collective bargaining; Non-discrimination and harassment; Women's Rights; Diversity, equity, and inclusion; Rights of minorities and indigenous peoples; Land, forest and water rights and forced eviction; Use of private or public security forces.*

At Novation Tech we are committed to upholding and promoting fundamental human rights, as well as providing a safe and fair working environment for all its Employees. We respect the principles of the UN initiative, in particular those relating to the protection of human rights at the international level, the right to collective bargaining, the abolition of modern slavery, forced labour and child labour. We comply with applicable laws and standards regarding wage and benefits, working hours and holidays, also according to CCNL (The Italian National Collective Labor Agreement).

It is our responsibility to comply with health and safety laws, regulations, and best practices, while also fostering a culture of proactive risk assessment, reporting, and continuous improvement. This leads to providing a safe and healthy working environment for all employees, striving to prevent accidents, injuries, and work-related health issues.

Novation Tech demands staff at all levels to be treated with dignity and respect and does not admit any form of abuse of power against them, such as for example corporal punishment, mental or physical coercion, verbal abuse, harsh or inhumane treatment.

We engage in ethical recruiting practices, ensuring that our recruitment processes are transparent, fair, and free from exploitation or discrimination. The approach consists of two overarching principles:

- Respect for Laws, Fundamental Principles and Rights at Work
- Respect for Ethical and Professional Conduct

And five specific principles:

- Prohibition of Recruitment Fees to Jobseekers
- Respect for Freedom of Movement
- Respect for Transparency of Terms and Conditions of Employment
- Respect for Confidentiality and Data Protection
- Respect for Access to Remedy

We reaffirm our commitment to eliminating all forms of discrimination, including but not limited to race, ethnicity, gender, religion, age, disability, sexual orientation, or any other protected characteristic. At the same time, we emphasize the promotion of diversity, inclusion, and equal opportunities with regards to recruitment, hiring, promotion, training, and compensation practices, fostering gender equality in all aspects of our operations and activities. We recognize and respect the rights of minorities and indigenous peoples, including their land and resource rights.

We do not support the practice of forced eviction, which constitutes a gross violation of a wide range of internationally recognized human rights, including the rights to adequate housing, food, water, health, education, work, security of the person, freedom from cruel, inhuman and degrading treatment, and freedom of movement. We recognize and respect the rights of local communities, minorities and indigenous peoples, including their land and resource rights, while committing to responsible land, forest, and water use.

We do not commission or use private or public security forces to protect our business if, due to a lack of training or control on the part of the company, the deployment of the above-mentioned security forces may lead to violations of human rights.

## **2. HEALTH AND SAFETY**

At Novation Tech we comply with applicable health and safety laws, regulations, and standards (see for example DVR, the Risk Assessment Document). We ensure a safe and healthy working environment and take effective measures to prevent accidents and damage to workers' health during or as a result of work and minimise, as far as possible, the causes of danger arising from the working environment. We are committed to conducting regular risk assessments to identify potential hazards and developing strategies to mitigate them. This involves evaluating workplace conditions, equipment, materials, and processes to minimize risk and ensure employee safety.

We appoint a management representative, responsible for ensuring a safe and stable working environment for all personnel; provide all staff with effective health and safety instructions and adequate personal protective equipment. We provide employees with necessary training and resources to maintain a safe work environment (including regular safety training programs, emergency preparedness drills, and ongoing awareness campaigns to enhance employee knowledge and engagement).

In case of accident, we provide first aid and assist the worker to receive subsequent medical treatment. We consider all risks associated with the work carried out by workers who are pregnant or have recently given birth and take all necessary measures to eliminate or reduce any risk to their health and safety. At Novation Tech all staff have the right to leave the workplace in case of imminent and serious danger, without asking permission from the company.

## **3. BUSINESS ETHICS**

*Anti-corruption and anti-money laundering; Data protection and data security; Financial responsibility (Accurate Records); Disclosure of information; Fair competition and anti-trust; Conflicts of interest; Counterfeit parts; Intellectual property; Export controls and economic sanctions; Whistleblowing and protection against retaliation*

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To ensure the maintenance of transparency, responsibility, and ethical compliance in our activities, it is important to establish clear business ethics expectations. These are set out primarily in different documents:

- The „Model 231“, also known as the Organization, Management, and Control Model pursuant to the Italian Legislative Decree no. 231/2001 – it is a regulatory document for many Italian companies, establishing a set of rules and procedures that must be followed within the company to prevent the commission of crimes. The Model 231 serves to ensure that the company and its representatives act in compliance with the applicable laws, promoting a corporate culture based on integrity, transparency, and respect for ethical rules.
- The Code of Ethics, setting out an organization's ethical guidelines, principles, values and best practices to follow for honesty, integrity, and professionalism. It seeks to ensure the way of doing business both inside and outside the Company.

Here are some key principles:

- a) Integrity and Honesty:
  - o Conduct business with absolute integrity and honesty.
  - o Avoid conflicts of interest and be transparent about any potential conflicts that may arise.
  - o Never engage in bribery, corruption, money laundering or any form of illegal activities.
- b) Respect for laws and regulations:
  - o Comply with all relevant laws, regulations, and standards, both local, national and international.
  - o Operate within the legal boundaries of the jurisdictions in which the company operates.
  - o Stay updated on changes in regulations and adapt business practices accordingly.
- c) Financial responsibility (Accurate Records, Transparency and Disclosure):
  - o Provide accurate, timely, and complete disclosures of information to stakeholders, including shareholders, employees, customers, and the public.
  - o Ensure financial statements and other reporting are transparent, reflecting the true financial position of the company.
  - o Disclose any potential risks or conflicts of interest that may impact stakeholders.
- d) Fair Competition and anti-trust:
  - o Promote fair and open competition, both domestically and internationally.
  - o Avoid anti-competitive practices such as price-fixing, market sharing, or monopolistic behavior.
  - o Respect intellectual property rights and refrain from counterfeiting or infringing upon competitors' patents, trademarks, or copyrights.
- e) Counterfeit parts:
  - o Commit to ensuring the authenticity and safety of our products, preventing the manufacturing of counterfeit parts, using verified suppliers, and implementing quality control measures to avoid risks associated with counterfeit goods.
- f) Intellectual property:
  - o Respect for intellectual property rights, obtaining proper licenses, respecting copyrights, trademarks, and patents, and discouraging any unauthorized use or infringement of intellectual property.
- g) Data protection and data security:

- Protection of any data from unauthorized access or breaches. Our company is committed to comply with applicable data protection laws, implement robust data security measures, obtain consent for data processing, and properly handle and store sensitive information.
- h) Responsible Marketing, Communication and Disclosure of information:
  - Adhere to ethical and responsible marketing practices, providing accurate and timely information, both internally and externally, avoiding false or misleading advertising.
  - Respect customer privacy and protect their personal information in accordance with applicable data protection laws.
- i) Export controls and economic sanctions:
  - Adherence to export control laws and regulations, as well as compliance with economic sanctions imposed by international entities.
  - Outline the responsibilities of employees in ensuring compliance, maintaining proper documentation, and refraining from conducting business with prohibited entities or countries.
- j) Whistleblowing Procedure and Protection against Retaliation:
  - Encourage employees and any stakeholder to report any unethical practices or wrongdoing within the organization in a confidential manner.
  - Ensure that employees can disclose information about potential violations confidentially, without fear of retaliation, through a designated reporting channel that guarantees their anonymity and protection (see Code of Ethics and Model 231).
  - Once a report is received, our company promptly investigates the matter, taking appropriate actions to address and rectify any misconduct or irregularities, fostering a culture of trust, integrity, and accountability throughout the organization.
- k) Novation Tech does not tolerate any form of retaliation by any party against whoever reports in good faith a potentially unlawful activity, or a breach or violation of principle of Novation Tech. Continuous Improvement:
  - Regularly review and update the company's ethics policies and practices to reflect changing social expectations and emerging ethical challenges.
  - Promote a culture of continuous learning, training employees, and raising awareness about the importance of business ethics.

#### **4. ENVIRONMENT**

*GHG emissions reporting; Energy efficiency; Renewable energy; Decarbonisation; Water quality, consumption & management; Air quality; Responsible chemical management; Sustainable resources management; Waste reduction; Reuse and recycling; Animal welfare; Biodiversity, land use and deforestation; Soil quality; Noise emissions.*

With the growing concerns surrounding climate change, it has become increasingly important for companies to prioritize sustainability and the protection and prevention of risks concerning the environment. In our commitment to a sustainable future, we aim to minimize our ecological footprint while fostering a harmonious relationship between our operations and the environment. Besides being certified according to ISO 14001 international standard, we also commit to the following key elements:

- a) GHG emissions reporting

- We have begun activities to measure and report our greenhouse gas (GHG) emissions in accordance with international standards. This includes tracking and disclosing the company's carbon footprint and other relevant emissions.
- b) Energy efficiency
  - we are going to implement measures to optimize energy efficiency, such as energy audits, facility upgrades, and employee awareness campaigns. The goal is to reduce energy consumption and associated greenhouse gas emissions.
- c) Renewable energy
  - We have installed photovoltaic panels for self-production of clean energy. New activities will include exploring opportunities for promoting sustainable practices by utilizing clean energy to reduce carbon footprints and foster energy independence.
- d) Decarbonisation
  - we will strive to transition our operations and supply chain towards a low-carbon model. This involves adopting clean technologies, promoting electric mobility, and partnering with suppliers committed to reducing their carbon footprint.
- e) Water quality, consumption & management
  - We implement responsible water management practices to ensure the preservation and conservation of water resources. This includes monitoring water quality, reducing water consumption, and avoiding pollutants in water discharges.
- f) Air quality
  - we take proactive measures to avoid air pollutants generated by its activities. This includes incorporating emission control technologies, promoting alternative transportation methods, and reducing combustion-related emissions.
- g) Responsible chemical management
  - we adhere to strict guidelines for handling, storing, and disposing of chemicals to prevent adverse effects on the environment and human health. This includes using safer alternatives where feasible and ensuring compliance with applicable regulations.
- h) Sustainable resources management
  - we strive to use natural resources in a responsible and sustainable manner, while complying with current rules and international regulations. This involves minimizing resource consumption, maximizing resource efficiency, and promoting a responsible sourcing of materials.
- i) Waste reduction, reuse, and recycling
  - we implement waste management strategies aimed at reducing waste generation and promoting reuse and recycling. This implies setting waste reduction targets, implementing waste sorting practices, and collaborating with recycling companies.
- j) Animal welfare; Biodiversity, land use, and deforestation; Soil quality
  - we ensure the ethical treatment of animals throughout our supply chain. This involves sourcing from suppliers with stringent animal welfare standards and avoiding practices that cause unnecessary harm or suffering;
  - We safeguard and encourage biodiversity, prevent deforestation, and lessen our impact on land use, fostering responsible sourcing and land management;
  - Where applicable and appropriate, we monitor and control our impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination
- k) Noise emissions

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- We take measures to minimize noise emissions and mitigate their impact on local communities. This includes noise monitoring, implementing noise reduction technologies, and adhering to noise emission regulations.

## **5. OUR BUSINESS PARTNERS' COMMITMENT**

At Novation Tech, we firmly commit to upholding the sustainability standards set above in every aspect of our operations, encompassing both the upstream and downstream sections of our supply chain. Recognizing the crucial role played by our suppliers, we embrace a comprehensive approach to sustainability. The relationship between Novation Tech and its suppliers and partners (“Suppliers”) is based on the same principle that govern Novation Tech plants as set out above and in the recalled documents.

Novation Tech seeks to work with who commit to achieving the requirements of this Sustainability Policy within its own business and across its value chains. All our Suppliers, who provide goods and/or services directly to Novation Tech or who has a contract with Novation Tech, or whom Novation Tech has expressly appointed to provide goods and/ or services to another Novation Tech supplier, even where they do not directly supply or invoice Novation Tech, have to comply with this Sustainability Policy.

### **About our requirements towards our Business Partners:**

Our Suppliers are required to adhere to applicable law (the laws, provisions, regulations, directives, and mandates enforced within the Supplier's locality or adopted for its business operations). Should any applicable law fail to meet the criteria set forth in this Sustainability Policy, Suppliers are expected to comply with the higher standards outlined in this section.

#### **I. Human Rights and Working Conditions**

The following section outlines the fundamental importance of human rights and working conditions in our business relationships. We believe that every individual, regardless of their role or position within our Supply Chain, deserves to be treated with respect, dignity, and fairness. Upholding human rights and ensuring safe and healthy working conditions is not just a legal obligation but a moral responsibility that we, at Novation Tech, are committed to. This section aims to establish a strong foundation for ethical business practices, emphasizing our expectations regarding human rights and working conditions for all Suppliers working with our organization, as well as within their own supply chain.

- Child labour and young workers: Suppliers, as well as their own supply chain, shall adhere to international standards regarding the employment of young workers, including providing appropriate working conditions and limiting working hours, while ensuring that child labor is not tolletated in any form at any level of their own supply chain.
- Wages and benefits: Suppliers shall provide their employees with remuneration at least at a level that adheres to the minimum wage stipulated by the respective Applicable Law, such as to enable them to meet their basic needs and have a decent standard of living,

while also providing benefits such as social security, healthcare, and paid leave as required by Applicable Law or industry standards.

- Working hours: Suppliers shall comply with legal limitations on working hours, including maximum hours per day and minimum rest periods, ensuring that overtime work is voluntary and compensated according to Applicable Law or collective bargaining agreements.
- Modern slavery (i.e., slavery, servitude, forced or compulsory labor, and human trafficking): Suppliers shall not engage in any form of modern slavery in their own operations or supply chains, granting freedom of choice of employment.
- Ethical recruiting: Suppliers shall ensure that recruitment processes are fair, transparent, and free from any form of exploitation or discrimination.
- Freedom of association and collective bargaining: Suppliers shall respect the rights of workers to join trade unions, associate freely, and engage in collective bargaining, without interfering with workers' rights to organize or engage in peaceful assembly. Suppliers shall also ensure that workers have the freedom to openly communicate with management about their working conditions and management practices, without experiencing any reprisal, threats, or mistreatment.
- Non-discrimination and harassment: Suppliers shall provide equal employment opportunities and refrain from any form of discrimination or harassment based on age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.
- Women's Rights: Suppliers shall ensure gender equality and promote equal opportunities for women in all aspects of employment, including recruitment, training, promotion, and remuneration.
- Diversity, equity, and inclusion: Suppliers shall embrace diversity and create inclusive workplaces that value and respect workers' differences, including race, ethnicity, nationality, religion, age, gender, sexual orientation, and disability.
- Rights of minorities and indigenous peoples: Suppliers shall respect and recognize the rights of minority groups and indigenous peoples, including their cultural heritage and traditional knowledge, while not engaging any actions that could result in discrimination, marginalization, or violation of the rights of these groups.
- Land, forest, and water rights and forced eviction: Suppliers shall respect the land, forest, and water rights of local communities and indigenous peoples, while avoiding activities that contribute to deforestation, land grabbing, or other forms of ecological harm.
- Use of private or public security forces: Suppliers shall ensure that any security forces hired or deployed at their facilities respect human rights and operate within the legal framework, and investigate and address any complaints or allegations of excessive use of force, harassment, or intimidation by security forces hired or associated with the supplier.

## II. **Health and Safety**

Suppliers shall provide a safe and healthy working environment for their employees, complying with all applicable laws and regulations related to occupational health and safety.



- International Standards: Suppliers shall set an efficient (and possibly certified) health and safety management system, in accordance with or following the principles of ISO 45001, or a similar standard, in order to continuously reduce health and safety risks and enhance working conditions for all workers, including subcontractors at the workplace.
- Applicable Laws: Suppliers shall comply with all relevant health and safety laws and regulations in the countries where they operate, being aware of their legal obligations and taking necessary measures to meet these requirements, safeguarding the well-being of their employees and stakeholders.
- Personal Protective Equipment (PPE): Suppliers shall provide their workforce with the appropriate Personal Protective Equipment (PPE) and ensure its proper usage and maintenance to minimize hazards and protect the health and safety of employees.
- Preparedness for Emergencies: Suppliers shall develop and implement effective emergency response plans, by assessing potential emergency situations, establishing emergency communication protocols, conducting drills and exercises, and providing necessary training to employees to ensure they can respond promptly and appropriately in case of any emergencies or disasters.
- Management of Incidents and Accidents: Suppliers must implement a robust incident and accident management system in place to promptly report and investigate all incidents and accidents, identify the root causes, and implement corrective measures to prevent similar occurrences in the future.
- Contractors / sub-suppliers: Suppliers shall ensure that their own contractors/sub-suppliers consistently adhere to health and safety standards by effectively sharing essential best practices information throughout their own supply chain, monitoring contractors' compliance with health and safety requirements, ensuring they receive adequate training and resources, and providing necessary oversight to prevent any potential risks or hazards associated with contractor activities.

### **III. Business Ethics and Compliance**

We believe in fostering strong and mutually beneficial relationships with our Suppliers while maintaining the principles of integrity, transparency, and responsibility in all our dealings. This section outlines the expectations we have from our Suppliers in terms of ethical business practices, compliance with laws and regulations, and commitment to creating a sustainable and socially responsible business ecosystem.

- Anti-corruption and anti-money laundering: Suppliers shall not engage in any form of bribery, corruption, or money laundering, and should have robust policies and procedures in place to prevent such activities.
- Data protection and data security: Suppliers shall handle any personal or confidential information provided by the contracting organization with utmost care, ensuring compliance with Applicable Law concerning data protection and implementing appropriate security measures to safeguard data.
- Financial responsibility (Accurate Records): Suppliers shall maintain accurate financial records in accordance with relevant laws and accounting standards, and disclose any financial information requested by the contracting organization, pursuant with Applicable Law. Suppliers shall ensure the existence of a sufficient financial reporting control system.

- Disclosure of information: Suppliers should be transparent and provide accurate and complete information about their products, services, and capabilities to the contracting organization, and must promptly disclose any changes that may affect the contractual relationship, in accordance with Applicable Law.
- Fair competition and anti-trust: Suppliers shall comply with all relevant competition and anti-trust laws and regulations, ensuring fair competition in the marketplace and refraining from engaging in any anti-competitive practices.
- Conflicts of interest: Suppliers shall disclose any potential or actual conflicts of interest that may arise during the course of their business relationship with the contracting organization and take appropriate steps to mitigate or avoid such conflicts.
- Counterfeit parts: Suppliers shall ensure that all products and components provided are genuine and not counterfeit, and should have suitable mechanisms in place to detect and prevent the supply of counterfeit parts.
- Intellectual property: Suppliers shall respect and protect the intellectual property rights of others, including copyrights, trademarks, and patents, and should not use any intellectual property without appropriate authorization.
- Export controls and economic sanctions: Suppliers shall comply with all applicable export control laws and economic sanctions, ensuring that their products or services are not exported to prohibited destinations or entities, and conducting due diligence to ensure compliance.
- Whistleblowing and protection against retaliation: Suppliers shall establish mechanisms for employees and stakeholders to report concerns or wrongdoing anonymously, without fear of retaliation, and shall protect whistleblowers from any adverse actions resulting from their reports.

#### **IV. Environment**

- ISO 14001: Suppliers shall demonstrate certification for their business locations according to the international standard ISO 14001, or at least provide documents/policies attesting their alignment with ISO 14001 principles
- Energy efficiency: Suppliers should strive to improve the efficiency of their energy usage and optimize their operations to reduce energy consumption.
- Renewable energy: Suppliers are encouraged to switch to renewable energy sources, such as solar or wind power, to minimize their reliance on non-renewable resources.
- Decarbonisation: Suppliers are expected to actively work towards reducing carbon emissions and transitioning to low-carbon or carbon-neutral practices.
- Water quality, consumption & management: Suppliers should ensure that water used in their operations is of high quality, minimize water consumption, and implement effective water management strategies.
- Air quality: Suppliers must take measures to minimize air pollution and monitor and report on the emissions from their activities, to protect air quality and mitigate health and environmental risks.
- Responsible chemical management: Suppliers should handle, transport, use, and dispose of chemicals responsibly in order to protect human health and the environment.
- Sustainable resources management: Suppliers are required to adopt responsible management practices for natural resources, ensuring responsible extraction, usage, and replenishment of resources.

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- Waste reduction, reuse and recycling: Suppliers must actively work to minimize waste generation within their operations, promote waste reduction strategies, and encouraged to develop and implement programs to reuse materials and promote recycling, in order to reduce the amount of waste.
- Animal welfare, biodiversity, land use, and deforestation; Soil quality: Suppliers shall ensure the ethical treatment and welfare of animals in their supply chain, protect biodiversity, avoid deforestation, promote sustainable land use practices, and protect soil quality through responsible management practices.
- Noise emissions: Suppliers are required to minimize noise emissions from their operations to prevent noise pollution and protect the well-being of local communities and workers.

### **Verification of Compliance with Sustainability Requirements**

We strongly encourage our Supply Chain partners to actively support and participate in adhering to our company's suppliers Sustainability Policy. These requirements are mandatory for all our suppliers and are a crucial aspect of our partnership. Additionally, when considering potential new suppliers, their alignment with these requirements will be a key factor in our procurement decision-making process. We have an extensive evaluation process to ensure that all entities within our supply chain share our commitment to ethics, the environment, and social responsibility.

We expect that every party involved will actively seek to identify and eradicate any non-compliances which may exist within our extended supply chain. Furthermore, we have monitoring mechanisms in place to track the sustainability performance of our suppliers. Novation Tech reserves the right to regularly, randomly, or specifically verify if parties are meeting sustainability requirements before approving new contracts and during the business relationship. This verification can be done through risk assessments, self-assessments, or on-site assessments. On-site assessments are conducted during regular working hours, with representatives present, and in compliance with applicable laws and data protection regulations. If required by legal obligations, business partners must also facilitate Novation Tech in assessing their own business partners. If sustainability risks are identified before entering or awarding a contract, the resulting measures become mandatory. The business partner must address any non-compliance within a reasonable time frame at no additional cost to Novation Tech. The findings from pre-contractual assessments affect the contract awarding process.

In the event of a breach or potential breach of sustainability requirements by the Supplier, or after such breaches are detected from the abovementioned verification activities, the following actions will be implemented by the Supplier and/or Novation Tech:

- Notification: the Supplier shall promptly notify the company of any actual or potential breaches of sustainability requirements. If such breaches are detected as a result of the verification process, Novation Tech shall promptly inform the Supplier about them.
- Investigation: Upon notification or result of the verification process, Novation Tech should initiate an investigation into the alleged breach to gather evidence and assess the extent of non-compliance.
- Corrective Measures: Once a breach is substantiated, the Supplier should be required to take immediate corrective actions to address the non-compliance and prevent further breaches. This

may include implementing process changes, adopting new procedures, or investing in necessary training.

- Compliance Plan: The Supplier should be required to develop a detailed compliance plan, outlining specific steps they will take to rectify the breach as well as preventive measures to avoid similar non-compliance in the future.
- Monitoring and Reviews: Novation Tech establishes a monitoring system to ensure ongoing compliance by the Supplier. Regular audits or inspections, transparent reporting, and periodic reviews should be conducted to assess compliance and identify any recurring issues.
- Consequences: A range of consequences should be outlined for non-compliance, which may include financial penalties, termination of the supplier contract, or suspension of business until compliance is restored.
- Collaboration and Support: collaboration with our suppliers is crucial to rectify sustainability breaches. By offering support, resources, and guidance, we strive for empowering our suppliers to meet sustainability requirements, drive positive change, and contribute to a more sustainable future. This collaboration benefits both parties, reinforcing our commitment to sustainability, and enhancing the overall performance of our supply chain. It also promotes transparency, trust, and accountability, ensuring a strong ethical foundation and an enhanced reputation to both parties.
- Continuous Improvement: The Supplier should be encouraged to continually improve their sustainability practices and actively engage in dialogue with us to understand evolving requirements, industry best practices, and new initiatives.

Novation Tech will continue to assess its business and supply chains to identify potential risks and to then target those areas with policies, procedures and training to ensure it maintains appropriate safeguards with respect to ethics, employees' rights and environmental responsibility, within its own business and supply chains.

This Sustainability Policy will be reviewed every other year or as needed

- Issued - January 2018
- Rev.01 - November 2020
- Rev.02 – March 2023
- Rev. 03 – January 2024
- Rev. 04 – July 2024

***The Management***  
**NOVATION TECH SPA**