



13.06.2019

SUPPLIER DECLARATION ON THE NEOVA GROUP SUPPLIER CODE OF CONDUCT

We herewith confirm that our company in all respects complies with the Neova Group Supplier Code of Conduct attached and which we have read and understood. We understand and acknowledge that compliance can be reached either by implementing the Neova Group Supplier Code of Conduct in our organization or by having our own rules and regulations and management systems, which fulfil the requirements of the Neova Group Supplier Code of Conduct and which will be kept operational during the term of the business relationship. Our own rules and regulations or the Neova Group Supplier Code of Conduct, whichever is stricter, will form an integral part of each contract between our Company and Neova Group, and our performance in relation to Neova Group shall be in compliance with the said rules. Neova Group has the right to invoke our sustainability rules and regulations or the Neova Group Supplier Code of Conduct, whichever is stricter.

Date:		
Place:		
Signature of authorized represent	tative	
Name in capital letters		
Company Name:		
Company ID:		





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NEOVA GROUP SUPPLIER CODE OF CONDUCT

Neova Group has a Code of Conduct that guide all employees in Neova Group in making the correct everyday decisions expected from a good corporate citizen and it sets out the minimum standards required in all our operations. Neova Group's Corporate Responsibility policy describes our operating principles in health & safety, environment and quality matters. This policy is followed up in all Neova Group companies and operations.

Neova Group seeks reliable and fair relations with its suppliers. Neova Group expects from its supplier's competence and continuous improvement in quality, reliability, cost control and innovation.

The purpose of this Supplier Code of Conduct is to guide Neova Group's suppliers to comply with principles outlined in Neova Group's Code of Conduct and Corporate Responsibility policy. This Supplier Code of Conduct concerns all Neova Group's suppliers and their employees, subsidiaries and ventures controlled by these suppliers. Neova Group encourages its Suppliers to develop their own corporate responsibility and compliance programs.

It is important for Neova Group to build and develop the company's business sustainably in the long term and we require that also from our suppliers. Ethical behavior is the basis for our everyday way of working, taking into account not only national and international laws and regulations but also the expectations of customers and other stakeholders.

We promote fair business practices and expect the same from our business partners, contractors, subcontractors, suppliers, sub-suppliers, distributors and any other cooperation partners ("Partners"). This also means that it is important to remember that this Supplier Code of Conduct cannot be circumvented by using subcontractors or other partners.

1. Responsibility and compliance with laws and regulations

We expect our suppliers to keep promises and provide services based on existing professional rules and high-quality ethical standards.

All suppliers shall comply with all applicable local, national and international laws and regulations applicable to suppliers' business and other commitments made by supplier. This also means that if the only way to close a deal is to act in a way that is illegal or unethical, the deal shall be forgone. If local customs or practices are in contradiction with this Supplier Code of Conduct, the supplier shall comply with this Supplier Code of Conduct.





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2. Conflicts of interest

Neova's suppliers shall avoid any conflicts of interest that may impair their business judgement and, where such emerge, disclose them, as personal benefit shall not influence in decisions.

Neova's and supplier's employees shall not seek any personal financial or other benefit in business relationships. In addition to actual conflicts of interest, also the mere appearance of such shall be avoided.

The supplier shall disclose to Neova all conflicts of interest or situations giving the appearance of a conflict of interest in its engagement with Neova. The supplier shall inform Neova if a Neova employee or his/her immediate family member holds a material financial interest in the supplier, holds a managerial position at the supplier, works for the supplier or has any other direct or indirect interest in the supplier.

3. Integrity - no corruption or bribery

The supplier shall act in compliance with all applicable anti-corruption laws, by, among other things, refusing to receive or offer bribes, facilitation payments or anything of value for the purpose of obtaining or retaining business or any improper benefit or advantage.

It is Neova's policy that we:

- always pay for the travel and accommodation costs of our own personnel when visiting suppliers, conferences, reference plants etc.
- only give and accept hospitality openly, making it clear that there is nothing to hide If we are offered any gifts, hospitality or expenses that could be considered unreasonable or inappropriate with regard to possible business transactions, we will, in addition to refusing to receive such gift, hospitality or expense, report this accordingly.

4. Promote fair competition – no antitrust violations

Competition provides incentives for efficiency, encourages innovation and guarantees consumers a wider choice of products and services at the best possible price. Restrictions to competition are prohibited throughout the world. Even in a situation where business is at risk, the only permissible course of action is compliance. The supplier shall compete in a fair manner in compliance with all applicable competition laws and regulations.

5. Know with whom you trade - anti-money laundering

Neova supports the efforts of the international community to prevent and combat international terrorism. Neova's suppliers shall mitigate the risk of becoming involved in supporting illegal business activities. All suppliers are required to observe anti-money laundering laws and trade sanction regimes and respect the trade bans and restrictions that are part of international embargos and international efforts to combat terrorism, including those which may affect payments and other movement of capital and re-export.





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6. Human and labor rights

Neova respects and observes international human and labor rights, including the UN Universal Declaration on Human Rights and the Fundamental Conventions of the International Labor Organization and requires the same from its suppliers. The supplier shall commit to fair and equal treatment of its personnel and shall not tolerate discrimination on the basis of race, national or ethnic origin, citizenship, skin color, language, gender, age, family conditions, sexual orientation, health, religion, social opinions, political or professional activism, or any other comparable reason. The supplier shall not tolerate any kind of harassment or bullying at work and we do not allow forced or child labor in its operations or by any of its Partners.

The supplier shall ensure that compensation paid to its employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and mandatory benefits.

The supplier shall respect its employees' right to freely associate and bargain collectively in compliance with all applicable laws and regulations.

7. Occupational health and safety

The supplier shall be committed to providing its employees a safe and healthy working environment in compliance with all applicable laws and regulations. Appropriate health and safety information, training and equipment shall be provided to the supplier's employees. Supplier shall invest in proactive actions, clear responsibilities as well as procedures to report and investigate health and safety incidents. Supplier shall immediately report all observed safety deficiencies to Neova.

8. Environmental impact

The supplier shall recognize the environmental impact of its operations and aim to minimize the adverse effects of its operations. Supplier shall fulfil all environmental requirements defined in relevant laws, regulations and environmental permits, and ensure that it's employees have appropriate know-how and experience in relation to environmental issues, as well as resources to enable them effectively to meet their responsibilities.

Supplier shall work to prevent environmental emergencies and ensure the capacity to react appropriately to such events, by analyzing, identifying and adopting suitable preventive and corrective measures. Major environmental deviations or risks that may have effect on Neova's business shall be communicated to Neova in shortest possible time.

9. Transparency

The supplier shall transparently, honestly and accurately record and disclose details of its business activities, corporate structure, financial situation and performance in accordance with applicable laws and regulations.





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10. Neova's property

Neova's property includes different tangible and intangible assets. The supplier shall treat all Neova's property with due care and use such property for promoting Neova's business only.

11. Trade secrets and intellectual property rights

The supplier shall safeguard all Neova's confidential information and shall take care to avoid any unintentional or unauthorized access to such information.

The supplier shall comply with all applicable laws and international treaties on intellectual property rights. The supplier shall not infringe Neova's or any third party's intellectual property rights.

12. Privacy

The purpose of Data Protection is to protect information relating to an identified or identifiable natural person against violations in the processing of such personal data. In all its operations supplier shall protect and lawfully process the personal data of all individuals – employees, customers, suppliers and other stakeholders.

13. Monitoring

The supplier shall regularly monitor its compliance with the Supplier Code of Conduct. The distributor shall upon request provide Neova access to all relevant information and documents needed to verify the supplier's compliance with the Supplier Code of Conduct. Further, Neova may after agreeing with Supplier itself or through a third party auditor survey the supplier's relevant premises to validate the supplier's compliance with the Supplier Code of Conduct.

Should the supplier in the reasonable opinion of Neova have materially violated this Supplier Code of Conduct, Neova may terminate the business relationship with the supplier.

If the supplier has a serious concern that something is not consistent with this Supplier Code of Conduct, we expect the supplier to report the matter to Neova.

14. Applicability

By agreeing to work with Neova the supplier confirms that it, its affiliates and its suppliers and partners comply with this Supplier Code of Conduct. An 'affiliate' means here a company that is controlled by the supplier, controls the supplier or is under control with the supplier