

# Novonesis employee code of conduct

Setting the standard for integrity: Doing what's right,  
knowing what right looks like and when to seek guidance.



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## Letter from the CEO

We innovate, develop and deliver transformative biosolutions to the world, and we are committed to pushing the boundaries of biology.

At the same time, we maintain a steadfast commitment to ethical business practices as a core part who we are, and how we operate.

In times of volatility, it's even more important to stand firm on what we believe is right: honesty, integrity, accountability, and transparency.

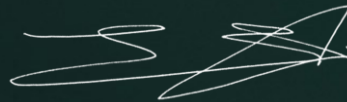
By upholding these principles, we build lasting relationships and a trustworthy reputation, which are essential for sustainable success.

To ensure that our actions reflect our core commitments, all employees must have a common understanding of how we conduct business with integrity across all cultures, locations and functions.

This employee code of conduct helps all of us do the right thing and have a joint understanding of what right looks like. We are all responsible for familiarizing ourselves with this code of conduct and following it in our work.

By adhering to the employee code of conduct, we contribute to a positive and sustainable future while protecting our company. Thank you for your dedication to doing the right things the right way.

Let's continue to lead with integrity while we better our world with biology.



**Ester Baiget,**  
CEO, Novonesis



# Purpose and expectations

*This employee code of conduct provides clear guidelines for integrity and accountability in the actions we take, and the decisions we make, to achieve our purpose – to better our world with biology.*

The employee code of conduct outlines responsibilities such as complying with laws and exercising good judgment. In that way, it complements our [culture commitments](#), which guide us in terms of general mindset, behavior and performance.

As Novonesis' policies, positions and procedures state, we adhere to applicable laws and best practice standards within business integrity. You can find our main policies [here](#).

As an employee, you are expected to behave with honesty, fairness and transparency. And you are expected to comply with the law and apply high standards of business integrity.

This employee code of conduct defines acceptable behavior, promotes integrity and compliance, and helps prevent legal and regulatory violations, reducing risks for Novonesis. It reinforces our commitment to accountability and reassures stakeholders of our ethical practices.

To support the requirements of this code of conduct, we have developed relevant procedures and guidelines. For details, please see [BioHub](#) (Novonesis intranet) and the Novonesis quality management system.

Requirements towards third parties are described in Novonesis' code of conduct for business partners, which you can find on [Novonesis.com](#).

## Chapter 1

# Anti-corruption

# 1.1 Bribery

*Bribery undermines trust in society and creates conditions where unfairness and inequality grow.*

Bribery disrupts the fairness of business practices and leads to inefficient use of resources. Bribery is illegal, harmful to business, detrimental to society and weakens the rule of law. That is why we prohibit bribery, and that is why we work diligently to protect our business operations against it in all its forms.

To ensure that we continue to foster a transparent and ethical environment in compliance with anti-bribery laws and regulations, all employees must diligently follow our anti-bribery rules and procedures in all business dealings and third-party interactions.

This means never offering or accepting bribes or items of tangible value (like gifts) or intangible value (like favors), which could be perceived as a bribe.

[Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information and contact points.](#)



## What is expected of you?

- **Adhere to zero-tolerance.** We have a zero-tolerance approach to bribery and corruption. This applies to our own activities and those of business partners.
- **Do not give or accept bribes.** Never give or accept money, gifts, favors, entertainment or other items of value if doing so could influence business activities or decisions or give such appearance.
- **Maintain accurate documentation.** Ensure that all financial transactions, payments and expenses are accurately recorded and properly reflect the true nature of the activities.
- **Ensure transparency.** Secure approval and reporting of gifts and hospitality and potential conflicts of interest in accordance with internal rules to ensure appropriate management as well as documented transparency.
- **Raise concerns.** If you are in doubt, seek guidance. If you suspect bribery or corruption, report it. Use the appropriate internal channels, ensuring prompt and professional action. Read more in Chapter 5, "Protecting the integrity of Novonesis".

## 1.2 Facilitation payments

*Facilitation payments, grease payments or speed money. Different words, same meaning. These payments are also bribes.*

Facilitation payments are small unofficial payments made to public officers to expedite routine processes with public authorities or gain preferential treatment. Even though some countries still allow facilitation payments, Novonesis prohibits such payments globally, as they promote unfair advantages, undermine trust and can lead to corruption. In addition, Novonesis is subject to laws and regulations with an international reach, prohibiting such practices everywhere.

This prohibition applies to all employees in Novonesis as well as to any third party acting on our behalf.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Do not engage in facilitation payments.** Do not pay facilitation payments, and reject any request received for such payment.
- **Control your third parties.** Never retain a third party to make a facilitation payment to a government official or enter into transactions where you suspect a third party is making such payments.
- **Report unethical requests.** If asked to make a facilitation payment, reject the request and report the incident to Legal Compliance.
- **Keep safe.** If you are unable to reject a request for a facilitation payment because there is an immediate threat to your or another person's safety, then your payment will not be in breach of this code. But you must report the incident to Legal Compliance as soon as possible afterwards.

## 1.3 Money laundering and other financial crime

*Understanding the flow of money to prevent facilitation of money laundering and other financial crime.*

We are committed to safeguarding our business from being exploited for criminal activities.

This requires remaining vigilant in all financial dealings and transactions and applying a healthy skepticism towards inexplicable requests. It means understanding the legitimate business need for deviations from standard payment practices and following internal procedures for review and approval.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Avoid the risk of participating in money laundering.** Know the third parties you engage with as part of your job and understand the transactions that you are responsible for.
- **Maintain accurate records.** Properly document all financial transactions and business relationships with correct records that accurately reflect real business activities.
- **Seek information, advice and approval.** Do not accommodate requests from customers or suppliers for deviations from standard payment or delivery route, unless you understand the legitimate business reason behind it. Ask the relevant questions, seek internal advice, and obtain the relevant internal approvals.
- **Report suspicious activity.** Immediately report any suspicious financial behavior or irregularities that could indicate money laundering and other financial crime through the appropriate internal channels.

## 1.4 Gifts and hospitality

*Excessive gifts and hospitality can influence or be perceived to influence business transactions.*

Exchanging gifts and hospitality, including entertainment, travel and accommodation, is often part of business culture. However, these practices can sometimes influence the recipient to make decisions that favor the giver or the giver's company, rather than their own employer. In such cases, the gift or hospitality could potentially constitute a bribe or give such appearance.

Therefore, it is crucial to ensure that all gifts and hospitality are offered and received transparently and for the right reasons.

Any gifts or hospitality offered or received by Novonesis employees must align with our values, not influence business decisions, and comply with applicable laws.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, including our global policy on gifts and hospitality, and contact points.*



### What is expected of you?

- **Offer and receive for the right reasons.** Only offer or accept gifts and hospitality when they are a genuine gesture of goodwill and openly exchanged.
- **Avoid unduly influencing decisions.** Never offer or accept gifts or hospitality where the intent or effect is affecting the business judgment or decisions of the recipient.
- **Avoid excessiveness.** Offering or accepting lavish gifts, extravagant entertainment, travel, accommodation or similar can influence the recipient and create a perception of undue influence. Refrain from such actions.
- **No cash gifts.** Do not offer or accept gifts in the form of cash or cash equivalents.
- **Respect legal boundaries.** Ensure that all gifts and hospitality comply with local laws and regulations.
- **Follow internal policies.** Adhere to Novonesis' policy on gifts and hospitality, which outlines monetary limits, approval processes and reporting obligations.

## 1.5 Donations

*Supporting causes with integrity and transparency.*

We are committed to responsible and transparent donation practices that align with our values and ethical commitments.

We may occasionally make donations to charity to support worthy causes. Our guidelines serve to ensure that these donations reflect our corporate responsibility and are not used to exert improper influence. Charitable donations must be made with no expectation of business returns.

We advocate our views to politicians through dialogue and reason, not financial contributions. Therefore, Novonesis does not make political donations.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Align with our values.** Only suggest or approve charitable donations that align with our corporate values and ensure they are subject to internal review, approval and reporting processes.
- **Do not make political donations on behalf of Novonesis.** This includes contributions to political campaigns, to political parties or party-affiliated organizations or individuals involved in party politics. Novonesis' membership of trade associations, which may have chosen to use a part of the membership fees to make political donations, must be cleared with Public Affairs to ensure compliance and alignment with Novonesis policies and commitments.
- **Ensure transparency and documentation.** You must obtain and archive detailed documentation of any charitable donation and its purpose, the recipient organization's name and proof of receipt.
- **Choose accountable recipients.** If you are responsible for a donation on behalf of Novonesis, make sure to only grant charitable donations only to reputable charity organizations to ensure accountable use of funds.

## 1.6 Conflict of interest

*Safeguarding Novonesis' interests in business decisions by protecting objectivity.*

A conflict of interest arises when an employee's personal interests (such as family, financial or social connections) interfere with their professional responsibilities. This can lead to biased decisions and actions that benefit the individual rather than Novonesis' best interests.

To ensure the integrity of our decisions, we must seek to avoid conflicts of interest, whether these conflicts are actual, potential or perceived, and we must manage the conflicts of interest, which appear.

Therefore, we have established internal rules to identify, disclose and manage conflicts of interest.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, including our conflict-of-interest policy and contact points.*



### What is expected of you?

- **Serve Novonesis' best interests.** Always make decisions and engage in activities that best serve our company.
- **Be aware of how you are perceived.** Be mindful of how your actions may be perceived by others inside and outside Novonesis and avoid situations that could give the appearance of a conflict.
- **Avoid involvement.** Avoid situations where your personal interests could conflict, or appear to conflict, with your professional responsibility.
- **Report conflicts of interest.** Report any actual, perceived or potential conflicts of interest to your direct manager immediately.
- **Meet managerial responsibilities.** As a manager, you must assess disclosed conflicts of interest, manage them by eliminating conflicts or through mitigating measures, and document the resolution process.
- **Avoid misuse of resources.** Do not misuse Novonesis' name, resources, influence or reputation to gain private advantages.

## 1.7 Fraud

*Protecting our assets against theft or deception.*

We maintain a culture of trust and ownership. Fraud undermines such a culture and damages the relationships we have built with our partners, employees and other stakeholders. That is why we are committed to preventing fraud from taking place by having relevant policies, procedures and controls.

We are committed to detecting and investigating fraud by having internal monitoring of suspicious incidents or patterns of potential fraud. And we are committed to ensuring professional investigations and adequate responses to substantiated fraud by having clear governance and dedicated roles and responsibilities.

Fraud will not be tolerated.

*Visit 'anti-corruption and antibribery' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Do not commit fraud.** We do not tolerate fraud in any form. Fraud includes:
  - **Using company assets for private purposes** – This includes but is not limited private use of company credit cards, production material and similar.
  - **False reporting** – This includes but is not limited to reporting private expenses as business related and submitting false or duplicate expense claims or time sheets.
  - **Misuse of position** – This includes but is not limited to misusing your position in Novonesis to gain personal benefits, e.g., preferential treatment or discounts.
- **Be accurate and thorough.** When you submit expense claims and documentation and when you register time and attendance and similar, make sure to be accurate and thorough.
- **Report fraud immediately.** If you suspect or observe fraudulent behavior, report it immediately using appropriate internal channels.
- **Be vigilant and prevent fraud.** Follow internal controls and be vigilant in preventing fraud by adhering to procedures, questioning suspicious activity, and participating in training on fraud prevention.

## Chapter 2

# Fair competition and trading

## 2.1 Quality and product safety

*Ensuring excellence in everything we do.*

We are committed to delivering high-performing, safe products that make a difference for our customers and their customers.

Whether our products are directly consumed by humans or animals, or integrated into our customers' brand and processes, we uphold the highest standards of quality and safety.

[Visit the Quality site on BioHub for more information and contact points.](#)



### What is expected of you?

- **Understand the impact.** Know and understand how your work impacts and supports the quality and safety of our products and services to our customers and stakeholders.
- **Be compliant.** Follow the requirements given in your role and adhere to relevant procedures in the Novonesis quality management system.
- **Take ownership.** Take ownership of improving your processes for the benefit of Novonesis, our customers and stakeholders.
- **Collaborate.** If in doubt or seeking inspiration, reach out to your colleagues and manager to discuss how to deliver and improve quality in your area.

## 2.2 Export Control and sanctions

*Ensuring compliance with trade sanctions and export control rules.*

Trade sanctions restrict or prohibit business with countries, entities and individuals who are involved in activities considered to be harmful or threatening.

Export control laws restrict or prohibit the transfer of certain products, technologies and services that pose a potential risk to peace and security.

We are committed to complying with applicable trade sanctions and export control rules and have implemented measures to ensure such compliance. This includes sanctions screening of business partners as well as special compliance measures for potential transactions involving sanctioned or high-risk countries.

*Visit 'export control and sanctions' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Know and follow our requirements.** Follow the trade sanctions and export control instructions applicable to your work. They are designed to prevent illegal export and import of products and services and to prevent collaboration with sanctioned parties or parties owned or controlled by sanctioned parties.
- **Know your collaboration partner.** Know the details of your customer, supplier or any type of partner involved in a business transaction – particularly if the partner is linked to a sanctioned region – and ensure that their company names, location and other details are registered correctly in our systems.
- **Know the sanctioned and high-risk countries.** If you are engaged in business activities potentially covering sanctioned or high-risk countries, you must know, understand and comply with additional compliance requirements and legal limitations applicable to such business activities.
- **If in doubt, reach out.** Consult Legal Compliance if you have doubts or concerns about a sanctions or export control compliance in connection with a business activity or business partner.

## 2.3 Fair competition

*Competition laws regulate business practices to ensure fair competition in the market. Fair competition fosters innovation and growth and protects consumer interests.*

Competition laws (also known as antitrust laws) are designed to prevent activities that could distort or restrict competition. They ensure that companies compete on the merits, quality and pricing of their products without using unfair business tactics. Violations of competition laws can result in severe consequences, including substantial fines, damage claims and reputational harm.

We are committed to comply with all applicable competition laws and maintain a strict zero-tolerance policy towards any violations.

*Visit 'competition law' on the legal compliance site on BioHub for more information, including policies and guidelines, and contact points.*



### What is expected of you?

- **Seek information and guidance.** If you are involved in business activities which could be subject to competition laws, you must understand the basic principles of these rules and recognize the critical importance of complying with them. This means diligently taking the training offered, actively familiarizing yourself with the available guidelines, and seeking advice when in doubt.
- **Never engage in illegal anti-competitive activities.** Comply with our internal policies and procedures related to competition law in all markets where we operate, avoiding behaviors like price-fixing, market/customer allocation and any other types of anti-competitive activity.
- **Do not discuss confidential matters or otherwise exchange confidential information with competitors.** Business-sensitive information such as pricing is especially risky. Always follow the guidelines for communication with competitors and potential competitors closely.
- **Do not misuse a strong market position.** In some markets, Novonosis may be found to have a strong position. In such markets, we have a further responsibility to ensure that our behavior does not restrict competition. Make sure you know what types of behavior to avoid.
- **Avoid misunderstandings in internal and external communication.** Use clear language in documents, presentations, emails and other forms of communication. Avoid ambiguous wordings which could be misinterpreted as anti-competitive communication.
- **Follow contracting guidelines.** Make sure that Legal reviews contracts in accordance with internal policy to ensure compliance.
- **Report questionable behavior.** If you encounter business behavior that could be infringing competition law, report it to your manager, Legal or the whistleblower hotline immediately.

## Chapter 3

# Privacy, data protection and security

## 3.1 Privacy compliance and data protection

*Maintaining trust through responsible handling of personal data.*

Protecting the privacy of our employees, customers and other third parties is key to maintaining trust and following global privacy regulations.

It is important that we manage personal, sensitive and confidential information carefully. This helps safeguard our reputation, foster strong business relationships, and reduce the risk of legal repercussions.

Clear guidelines help everyone stay compliant with privacy and data protection laws and regulations.

*Visit 'data privacy' on the legal compliance site on BioHub for more information, including policies, guidelines and contact points.*



### What is expected of you?

- **Collect and use data responsibly.** Collect, use and keep personal data only if it is needed for legitimate business purposes and only for as long as needed. Do so in accordance with Novonesis' internal guidelines and applicable laws.
- **Conduct responsible procurement and implementation.** Contact Legal Compliance when purchasing new systems or applications to host or process personal data to ensure compliance in the contracting and implementation phase. Prioritize privacy by design and default.
- **Keep it safe.** Make sure to store personal data securely and with relevant access restrictions. Use our dedicated systems to avoid unauthorized access and use.
- **Do not overshare.** Share personal data only if necessary for the legitimate business purpose identified and only as much as necessary.
- **Delete personal data.** If you don't need the personal data for legitimate business purposes anymore, delete it. Clean up your archives and folders frequently and diligently.
- **Report data breaches.** A data breach is a security incident leading to unauthorized access to or loss of personal data. If you think there has been a data breach, report it immediately in accordance with internal guidelines.
- **Meet managerial obligations.** Managers of employees who process personal data as part of their function must ensure that they follow privacy policies and procedures, attend regular training, and address issues quickly.

## 3.2 Confidentiality

*Protecting our own and our business partners' data is key to safeguarding our competitive edge and our reputation as an accountable business partner.*

Novonesis is a knowledge-based company and maintaining the confidentiality of information, data and knowledge we receive, share or create, alone or with business partners, is crucial to protecting and supporting our business.

Many employees work with confidential information, whether relating to research and development, sales and supply or other categories of non-public information. The information may relate to Novonesis or business partners. Employees must handle confidential information with care, share on a need-to-know basis and in accordance with internal policies and procedures.

*For more details, consult the standards for handling confidential information in your area or reach out to your manager for guidance.*

*For more information on insider rules, visit the "insider rules" on the legal site on BioHub.*



### What is expected of you?

- **Protect confidential information.** Handle confidential information with the utmost care. This includes proprietary data, trade secrets, financial records, customer details and any other non-public information.
- **Limit disclosure.** Only share confidential information with authorized individuals who need it to perform their job duties. Unauthorized disclosure, whether intentional or accidental, is strictly prohibited.
- **Don't share or use inside information.** If you have access to price-sensitive information ("inside information"), you must strictly observe our internal rules on handling of inside information to prevent unauthorized disclosure and abuse. You may never trade or encourage others to trade based on inside information.
- **Handle information securely.** Use secure methods for storing and transmitting confidential information. This includes using strong passwords, encryption and secure storage solutions. For technical security measures, refer to Section 3.3 (Information Security),
- **Understand the classification of data.** Make sure that you understand the classification of the data you work with so that you can comply with relevant company policies and procedures for use, sharing and storage. The obligation of confidentiality continues after the end of your employment with Novonesis.

## 3.3 Information security

*Security and cyber resilience across Novonosis is a top priority.*

We are committed to maintaining a high level of cyber and information security across the organization. This is critical for protecting Novonosis' data, assets, and systems from misuse, unauthorized access or cyber threats.

We achieve this by thoroughly protecting our data, assets, and employees. We conduct timely risk assessments, enforce security policies, and maintain a secure and cyber-resilient environment.

Additionally, we provide clear guidelines and training to employees on how to identify and mitigate security risks.

*To consult the IT and cybersecurity policy, or if you otherwise need guidance, visit the [Cyber Security site on BioHub](#).*



### What is expected of you?

- **Adhere to security policies and training requirements.** Be aware of and adhere to requirements outlined in Novonosis cybersecurity policies, along with any global and local security instructions. Complete cybersecurity training programs in a timely manner and stay updated with the awareness guidelines provided by the Cyber Security Department.
- **Report and respond to security incidents and breaches.** Report security incidents and potential breaches as quickly as possible, whether there is uncertainty about suspicious activities and/or in the case of a confirmed security incident or breach. Recognize and promptly report any suspicious phishing attempts (in the form of suspicious emails, links or attachments).
- **Secure new IT designs and initiatives.** Consider security by design and incorporate security best practices and assessments as a primary consideration into the planning and design phases of new designs and initiatives.
- **Protect our data and assets.** Protect Novonosis data and assets (such as devices, PCs, tablets, access cards) from misuse, malware and theft; treat them as valuable tools. Only share Novonosis data and information on a need-to-know basis and ensure a secure way to share them. Install software updates and patches in a timely manner and use Novonosis-approved software and tools as required by the Cybersecurity Dept to ensure Novonosis' information and assets are protected. Follow IT's guidelines for secure access when working remotely. This may include access through secure VPN and multi-factor authentication (MFA).

## Chapter 4

# Human and labor rights

## 4.1 Human rights and labor standards

*We are committed to ensuring that human rights are upheld and that labor practices meet the highest ethical standards across all aspects of our operations and supply chain.*

We take full responsibility for respecting human rights, guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

To fulfil our commitment, we require the unwavering support from all employees. This includes diligently following policies and procedures established to embed human rights in Novonesis operations and personally committing to treat everyone with respect and dignity.

[Global non-discrimination and anti-harassment policy](#)



[You can read more about our positions and statements on labor practices and human rights \(to be published\) on our website: About us | Policies & positions | Novonesis.](#)

### What is expected of you?

- **Respect human rights.** We support and respect the protection of internationally proclaimed human rights and expect you to uphold these rights and behaviors.
- **Understand your impact.** Know and understand how your actions, behavior and work impact human rights and ensure they are protected and respected.
- **Foster a safe working place for all:**
  - Do not discriminate based on age, sex, gender identity, race, national origin, ethnicity, disability, education, sexual orientation and/or religious beliefs.
  - Recognize and respect workers' rights to form and join unions and associations and to bargain collectively.
  - Do not engage in any kind of verbal or physical harassment.
- **Act responsibly.** Any suspicion or awareness of human rights violations in our operations or value chain must be reported immediately to the appropriate internal channels, ensuring prompt and professional action.

## 4.2 Health and safety

*Ensuring health and safety in everything we do.*

We have a responsibility to protect our employees and anyone involved in our activities by ensuring that our workplaces operate in a safe and sound manner.

We motivate, train and involve people in our health and safety procedures.

*Visit the health and safety site on BioHub for more information and contact points.*



### What is expected of you?

- **Take safety precautions.** Take all appropriate precautions to ensure your own safety and the safety of others around you.
- **Support a strong safety culture.** Promote a healthy and safe work environment.
- **Be aware.** Ensure that you, and others, are aware of our health and safety positions and procedures and are aware of how they impact our work.
- **Protect yourself and others.** Use the appropriate personal protective equipment where necessary and in accordance with the correct procedures.
- **Never compromise on health and safety.** Report any concerns you may have to your manager and help ensure relevant measures and continuous improvement.
- **Speak up.** Inform your manager about new opportunities and changes in your daily work routines to improve health and safety practices.
- **Stay focused.** Never be under the influence of alcohol or drugs while at work.

## 4.3 Anti-harassment and equal opportunities

*Growing our future through respect and care for everyone.*

We unlock our collective strength by embracing and respecting differences, fostering inclusion, and ensuring that everyone feels a sense of belonging.

Discrimination and harassment, including sexual harassment, have no place in Novonesis.

We are committed to enforcing a culture of ethical, inclusive behavior that protects everyone's right to a safe and equal environment within all business operations globally at all sites and in all layers of the business.

*If you want to know more, visit the [diversity, equity, and inclusion page on BioHub](#).*



### What is expected of you?

- **Speak up.** If you experience or witness wrongful behavior or disrespectful language, speak up and seek support. Talk to your leader or raise your concerns through People & Organization, an employee representative, or by using our whistleblower hotline.
- **Include everyone.** Be an ally by listening to all voices and respecting all identities.
- **Practice equal opportunities and respect.** Act with care and explore individual experiences to ensure equity. Respect diversity of gender, age, ethnicity, race, culture, religion, ability, sexual orientation, political opinion, family responsibilities and background to support bettering the world through our strong community.

## Chapter 5

# Protecting the integrity of Novonesis

## 5.1 Working with business partners

*Building relationships based on trust and integrity.*

Our commitment to integrity extends beyond our internal operations to our interactions with third parties, including suppliers, customers and other business partners. Responsible engagement with third parties is essential to our success; it is also crucial to maintaining our ethical standards and protecting our reputation.

Collaboration with trusted partners helps us maintain high standards of corporate responsibility and promotes ethical behavior throughout our value chain.

*Visit 'business partners' on the legal compliance site on BioHub for more information, contact points and resources.*



### What is expected of you?

- **Engage with trusted partners.** Work only with business partners who share our ethical values and comply with relevant laws and standards.
- **Follow policies and standards.** Ensure that no business partner is engaged to perform activities that are inconsistent with our internal policies and legal requirements.
- **Practice zero tolerance for unethical behavior.** All business partners representing Novonesis must adhere to strict anti-bribery and anti-corruption policies. These partners are required to implement and maintain adequate measures and controls to prevent corrupt practices.
- **Use our business partner code of conduct.** Request that business partners comply with the Novonesis business partner code of conduct in accordance with the instructions from Legal and/or Procurement.
- **Conduct due diligence.** Conduct proper due diligence when selecting business partners to ensure they meet our ethical and operational criteria. Follow designated due diligence programs where applicable.

## 5.2 Employee roles and responsibilities

*As an employee, you are the cornerstone of our commitment to compliance and business integrity.*

### Expectations relevant to your role in Novonesis

As an employee in Novonesis, you are responsible for knowing and understanding the expectations outlined in this code of conduct and for following them in your daily work.

As a manager in Novonesis, you hold a pivotal role in fostering an ethical work environment where standards of business integrity guide decision-making and business behavior. You must lead by example and demonstrate integrity in all actions. You must help ensure that all your team activities comply with company policies and that potential violations are addressed. When employees seek your advice in business integrity matters, you must provide clear guidance and ensure alignment with Novonesis goals and values. This means consulting the relevant internal functions, when you are in doubt.

### Seek guidance and raise concerns

Regardless of your role in Novonesis, if you are ever in doubt as to whether a certain activity or decision follows this employee code of conduct or otherwise is potentially illegal or does not live up to our standards of business integrity, it is your responsibility to seek guidance. Reach out to your manager or to the relevant departments such as Legal, Legal Compliance, Corporate Finance or other corporate functions with a clear responsibility for the topic in question.

And if you see something, say something. It's your obligation as an employee to report concerns. This helps us identify and address potential problems before they escalate. It helps us ensure compliance with laws, thereby reducing the risk of sanctions and financial and reputational damage. And it helps promote a culture of transparency and accountability.

Each section in this code of conduct contains references to where you can find more information and relevant contacts.

### Addressing violations

All employees must comply with the policies described in this code of conduct as well as support our procedures, guidelines and applicable laws. We do not tolerate any violations.

Suspected violations will be managed in accordance with internal guidelines securing a professional, unbiased, fair and confidential investigation and adequate response.

Breach may lead to sanctions. Depending on the severity and nature of the violation, the employee may face disciplinary sanctions, ranging from re-training, oral or written warnings and suspension to dismissal. In some cases, legal actions may also be relevant.

Novonesis will determine the appropriate response based on the specific circumstances of each case, ensuring all actions are in line with applicable laws and company policies.

## 5.3 Whistleblower hotline

*Maintaining trust by speaking up.*

We believe in a culture of openness and trust.

Our whistleblower hotline allows employees, business partners and other third parties to report concerns about illegal or unethical misconduct, without fear of retaliation.

By speaking up, you – and others submitting reports in good faith – help us maintain high standards of integrity, protect our reputation, and ensure a safe and fair workplace for everyone.

*For more details, visit the 'whistleblower hotline' section on BioHub, where you can also find relevant contacts or go directly to the external [Whistleblower hotline](#) site to submit a report.*



*You can read more about the hotline in the Whistleblower Policy.*



### What is expected of you?

- **Report concerns responsibly.** If you witness or suspect any form of misconduct, such as fraud, harassment, corruption or other illegal activities, use the whistleblower hotline to report it.
- **Confidentiality is key.** The whistleblower hotline is confidential, and you can choose to report anonymously. Your identity will be protected.
- **There is no retaliation.** We have a strict no-retaliation policy. Anyone who reports concerns in good faith will be protected from negative consequences of reporting.
- **Use the hotline wisely.** The whistleblower hotline is for serious concerns. If you have general questions or everyday work-related issues, talk to your manager or People & Organization.
- **Take action quickly.** If you suspect something is wrong, report it as soon as possible. Early reporting helps us address issues more effectively.

In short: **Speak up** if something feels wrong. We are here to listen, and your concerns will be taken seriously.

# Novonesis is leading the era of biosolutions.

By leveraging the power of microbiology with science, we transform the way the world produces, consumes and lives. In more than 30 industries around the world, our biosolutions are already creating value for thousands of customers and benefiting the planet. Our 10,000 people worldwide work closely with our partners and customers to transform business with biology. Let's better our world with biology.