



**CODE OF ETHICS  
NOVA TRADING S.A.  
2023**

## **Introduction**

We all come across situations requiring decisions based on ethical grounds both in private and professional life. In both cases, our attitude should be identical, as honesty is always the underlying factor in our behaviour. The idea behind the “Nova Trading Code of Ethics” is to pose a number of questions for all of us when making decisions related to official issues to consider whether the solutions we apply are legal, moral, fair, good and compliant with company policies.

The Code of Ethics sets forth some rules to be followed when working with and contacting our customers and suppliers, any external institutions and offices, the local community, and similar bodies. Its role is to constantly remind us of our responsibility for developing relationships based on fairness and common good. We all make a contribution to the company’s reputation. By behaving ethically in business we boost our reliability, increase customers’ trust, and earn their respect.

## **The essential principles of ethics**

### **Honesty**

In whatever we do, we act in compliance with the applicable law, professional ethics and internal procedures of Nova Trading. The clearly defined rules based on work ethics and the focus on common good make our activities transparent.

### **Diligence**

We diligently comply with all our duties and responsibilities, performing all of them to the best of our abilities. We manage our working time well and work efficiently.

### **Professionalism and perfection**

Whatever your duties and position within the company may be, we all strive to be experts in our line of business. We constantly try to develop our knowledge to become more professional in our work. We enhance our creativity and establish good relationships. We identify and eliminate the causes of our mistakes in order to improve the quality of our work. The person who has made a mistake is given the opportunity to improve. Together, we establish a corrective programme. All the technical and organizational issues we encounter are approached as challenges. We are open-minded to new knowledge and adjust to new circumstances under which we need to operate.

### **We prevent conflicts of interests and corruption risks**

We undertake no activity resulting in malpractices or damages to the company.

We consider all forms of corrupt behaviour to be unacceptable - we do not engage in or solicit acts of a corrupt nature.

## **Safety**

Occupational safety and health protection of our personnel and individuals working with us are very important to us. We comply with the laws and regulations relating to health and safety at individual workplaces. We take measures to improve working conditions to an extent that goes beyond the legal requirements in this area. We monitor the parameters of the working environment. We strive to increase awareness and the level of personnel involvement to ensure safe working conditions, which includes warning of situations that threaten people's health and lives.

## **Care for the environment**

We undertake to protect the natural environment as a common asset. We control and limit our impact on the environment, among others, by means of effective use of the resources provided by the company (controlled energy consumption, sharing documents by electronic means, etc.), segregation, proper disposal, and management of waste, and similar actions.

## **Relations with personnel**

People make up the most important asset and are the actual reason for the company's success. Our company employs people who are committed to accomplishing the tasks assigned to them.

The objective of Nova Trading is to strive to create a working environment which facilitates a perfect use of the personnel's knowledge and skills to the best development of the company.

We work as a team with a clear goal that we strive to achieve together.

## **HR policy rules**

The rules we follow when organizing work within the company:

- when recruiting, professional profiles of applicants are assessed only in terms of their compliance with the interests of the company,
- we respect the minimum age in the hiring process in accordance with national legislation - the employment of children is strictly prohibited,
- no harassment and discrimination on whatever grounds are tolerated at work, in particular on grounds of gender, nationality, race, religion, political convictions, sexual orientation, and the like,
- we assist our personnel in acquiring additional qualifications by holding internal/external trainings and financing training courses, degree studies, etc.,
- we respect our personnel's health and are mindful of ensuring safe working conditions for them,
- any form of coercion by restraint of liberty or threat of physical violence as a disciplinary or control measure is absolutely prohibited,
- we take care to keep the right work life balance,
- we promote the idea of entrepreneurship among personnel members – we appreciate the contribution they make to process improvements, increased efficiency, cost-effectiveness, etc.,
- we strive to create a friendly working environment.

## **Rules of conduct at work**

The rules we all need to follow when performing our duties:

- respect one another – especially when under stress or pressed for time,
- offer support and assistance to others in order to efficiently deal with tasks,
- do not shift your work and responsibilities to others,
- accept constructive criticism,
- learn from your mistakes,
- be open to joint problem solving,
- make no empty promises –offer reliable information, including lead times and capabilities,
- take the insightful approach – owing to our knowledge of the process we are better at performing the job, make improvements, and perfect the quality,
- take the non-routine and non-superficial way, do not lock yourself into the so-called comfort zone,
- maintain good internal communication by sharing any necessary information with individuals for whom it may be relevant or affect their performance at work, etc. – first and foremost with superiors,
- use the telecommunication and IT systems for official purposes only,
- do not install any software unless approved and authorized by the IT department,
- efficiently manage the use of energy, paper, and similar resources, ensure proper waste management, etc.,
- if in doubt about the proper course of action when performing official duties(including issues of ethical nature), consult your superior, the Board of Directors and/or the legal advisor of the company
- always react to any breach of law, Nova Trading internal rules and procedures, provisions of the Code of Ethics, etc. observed on the company premises; depending on the gravity of the breach, use a warning for the breaching individual and/or report the breach to your superior and/or the company management.

This is a non-exhaustive list of examples of situations that can be encountered in mutual relations among personnel members. It is to be used as guidance only.

## **Relations with customers**

Our contacts with customers are built on the principles of integrity, diligence, professionalism, and the need for mutual understanding. We strive to create partnership relations based on mutual benefits resulting from well-established cooperation and continuous development.

The confidential information made available by our customers is considered a company secret.

We make sure we inform our customers about our products, services, prices, etc. without taking unfair advantage of their trust or lack of knowledge or experience.

Any reservations made by customers with regard to the cooperation with Nova Trading are promptly considered by the management and/or the Board of Directors of the company based on the principle of integrity.

It is our priority to maintain the established quality standards of the products and services offered and to strive for the highest customer satisfaction possible. These objectives are facilitated by the procedures of the management system and the technologies in place within the company (modern production lines, software, etc.).

The entertainment expenses need to comply with the applicable laws and the accepted customs.

## **Relations with contractors**

Our cooperation with contractors is the driving force behind the daily business operations of Nova Trading. We value the contribution made by our partners to the development of our company and respect their right to any payments owing to them for the products and services they supply. Our negotiations are conducted with mutual respect.

In our relationship with suppliers, we expect them to accept terms and conditions of cooperation in line with our ethical values.

When making purchases, we try to find a stable and reliable source of supplies. Our selection of business partners is always guided by the interests of our company – we objectively assess competitiveness of offers, quality of products and services, and suppliers' compliance with ethical standards in business.

## **Relations with public institutions**

All the relations between the company and public institutions follow the principles of cooperation and respect.

We do not support any initiatives or events of political nature.

## **Relations with local community**

With a sense of solidarity, we support the development of the community in which the company operates. This objective is accomplished by measures such as charitable activities, promotion of local cultural events, organisation of traineeship and placements for pupils and students, and other similar actions.

We respect the natural environment in line with the “Care for the environment” section above.

## **Relations with media**

The organizational units authorized to make direct contacts with media are the Board of Directors of the company and the Marketing department. Any inquiries from media, organizations, institutions and the like should be forwarded to the Marketing department. Any interviews by the employees of Nova Trading concerning the company business need to be given a prior approval of the Board of Directors and the final authorization of the Marketing department, which will consult the Board of Directors in case of any doubts with regard to the press article contents.

In relations with media we adhere to the principles of integrity, diligence, and professionalism.

### **Advertising**

We make efforts to keep the company advertising campaigns compliant with the principles of fair competition so that our advertising is reliable, not misleading, and free from offensive content.

## **Putting the Code of Ethics into practice**

By assuming the duties of Nova Trading employees, we all become responsible for making sure our actions comply with the provisions of the Code of Ethics.

The company's whistleblowing policy, including violations of the Code of Ethics, is outlined on Nova Trading's website, REPORT A BREACH tab.

## **Legal standards**

We observe all legal regulations, including as set forth in the provisions of the Code of Ethics, and in particular the following: the Labour Code, occupational health and safety regulations, applicable regulations and conventions of international organizations, and the like.

*Toruń, date 24.07.2023*