



Supplier Global Code of Conduct



Introduction

Neovia's success is driven by our reputation as a trustworthy and ethical company in the markets we serve and the communities where we live. We continually hold ourselves to the highest standards of corporate integrity, responsible sourcing, environmental sustainability, and the safety and wellbeing of workers across the globe.

These principles are reflected in this Neovia Supplier Global Code of Conduct (Code). It establishes the minimum standards that must be met by any business or entity that supplies products or services to Neovia.

This Code is designed to support our efforts in guiding your performance to meet the highest standards within the workplace each day. Along with a commitment to ethical and sustainable behavior, the foundations within this Code are key to our shared success. It establishes social, ethical, and environmental values that we expect each of our suppliers—and their suppliers, alike—to follow.

Thank you for your commitment to collaboration and helping to maintain the legacy of integrity we enjoy at Neovia.

Scope and Purpose

This Code is for all suppliers. It sets out expectations for health and safety, responsible business practices, behavior, environmental awareness, and sustainability. We expect all our suppliers to:

- Be responsible to mitigate against supply chain risks, considering sustainable and ethical practices
- Operate in compliance with all applicable laws
- Be able to demonstrate when asked the mitigation and steps taken on any risk
- Ensure that other companies within its supply chain are aware of this Code and comply with it

The provisions of this Code are in addition to and not in lieu of any legal agreement or contract between Neovia and our suppliers. If there is a conflict among any applicable laws or regulations, the agreement between the parties, or this Code, the supplier shall meet the most stringent standard.

Neovia has the right to modify this Code from time to time.

1. HEALTH AND SAFETY

Suppliers should provide a secure, safe, and healthy workplace for their employees. Suppliers should seek to maintain a productive workplace by complying with all applicable occupational safety and health laws, rules, and regulations, as well as by mitigating the risk of accidents, injury, and exposure to health risks.

Suppliers should properly manage the health and safety of contractors as part of their extended supply chain. Where applicable, suppliers should provide and maintain their workforce with necessary Personal Protective Equipment (PPE) and ensure they understand how and when it needs to be used.

Suppliers should coordinate their procurement processes to identify hazards and to assess and control risks arising from the contractor's business activity with the supplier, and the company's business activity that impacts the contractor's workers. Additionally, suppliers and their employees shall comply with all Neovia health and safety requirements while performing services when onsite at a Neovia facility.

2. STANDARDS OF COMPLIANCE

Neovia expects its suppliers to:

- a) Perform all services in accordance with generally accepted professional standards
- b) Obtain and maintain all permits, licenses, and authorizations necessary for their employees to perform the services
- c) Maintain awareness of and comply with all applicable laws and regulations of the countries in which they operate
- d) Source and manage their employees and supply chains in accordance with this Code
 - Ensure fairness with integrity with all employees, sub-contractors, or any third parties
 - Take steps to explain this Code to all employees and key suppliers within their business so there is understanding and awareness of this Code
- e) Monitor their compliance with this Code and report any violations (actual or suspected) of this Code as soon as possible to suppliers@neovialogistics.com
 - Suppliers shall not retaliate or take disciplinary action against any employee or any entity or individual in their supply chain that has, in good faith, reported violations of this Code or questionable conduct, or who has sought advice regarding this Code

Neovia may conduct audits to verify or assess suppliers' compliance with this Code. Neovia has no obligation to conduct such audits.

3. DATA PROTECTION AND DATA SECURITY

Without prejudice to the agreement(s) between Neovia and its suppliers, each supplier shall have in place appropriate measures to:

- 3.1 Maintain the confidentiality of Neovia's and its partners' information. Suppliers should take reasonable and necessary precautions to safeguard Neovia's and its partners' information to which it has access, including not disclosing to anyone, inside or outside of Neovia, unless the disclosure is properly authorised, in connection with a clearly defined and legitimate business need and subject to a written confidentiality agreement.
- 3.2 Ensure there is no unauthorized access of information by third parties, including its workers or supply chain. Suppliers should respect privacy and civil liberties in respect of the collection, retention, use, or dissemination as well as any other processing of personal data. Suppliers should refrain from using personal data for any purposes beyond the scope of the business arrangement. Specifically, and without prejudice to the respective agreement(s) between Neovia and its suppliers, each Neovia supplier shall have in place appropriate measures to: (a) protect the integrity and confidentiality of information (including information belonging to or supplied by Neovia held on its systems, which include physical and online or electronic systems); and (b) ensure that there is no unauthorised access of the information by third parties, including entities and individuals in its supply chain. Suppliers shall comply with all data protection laws and requirements when processing any personal data on Neovia's behalf.

4. CONDUCTING BUSINESS LEGALLY AND ETHICALLY

4.1 Anti-Bribery

Neovia is committed to conducting business legally and ethically within the framework of a free enterprise system and strictly prohibits corrupt arrangements with customers, suppliers, government officials, or third parties. As such, Neovia prohibits its suppliers from engaging in any form of public sector or commercial bribery. Under no circumstances may a supplier acting on behalf of Neovia promise or provide anything of value directly or indirectly to a government office, or to any person or entity in the private or commercial sector.

4.2 Anti-Money Laundering

Money laundering is strictly prohibited. Neovia forbids knowingly engaging in transactions that facilitate money laundering. Money laundering is the process of converting illegal funds to appear legitimate. Neovia takes steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to the transactions. Neovia is committed to full compliance with anti-money laundering laws throughout the work and will conduct business only with reputable third parties involved in legitimate business activities and transactions.

4.3 Anti-Corruption

Suppliers must not participate in, or endorse, any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality, or facilitation payments. Suppliers must prohibit promising, offering, authorizing, and giving or accepting something of value—either directly or indirectly through a third party—to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers should establish internal processes / whistleblowing systems aimed at receiving and handling reports about any occurrence of suspicious transactions while guaranteeing confidentiality and non-retaliation.

5. EXPORT CONTROLS, TRADE, AND ECONOMIC SANCTIONS

Suppliers shall comply with applicable restrictions on the export or re-export of goods, software, services, and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities, and individuals.

5.1 Financial Responsibility / Accurate Records

Suppliers shall perform their business dealings in a transparent manner and accurately reflect them in the company's financial reports and filings. Suppliers should confirm an adequate financial reporting system control is in place.

5.2 Conflicts of Interest

a) *When dealing with Neovia employees*

Suppliers to Neovia or anyone acting on Neovia's behalf are prohibited from providing or offering gifts to Neovia employees that could inappropriately influence Neovia's business decisions or gain an unfair advantage. Neovia chooses vendors and other business partners based on objective factors like cost, quality, value, service, and ability to deliver. Each Neovia employee is expected to carefully avoid even the appearance of making business decisions based on gifts received through business relationships. Infrequent business entertainment is only appropriate when it is not excessive, occurs in connection with an official business discussion, and does not create the appearance of impropriety.

b) *Among supplier employees*

Suppliers should ensure that their employees either avoid entirely or disclose any situations where their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.

6. FAIR COMPETITION

Neovia believes in free and open competition. In most countries, strict laws prohibit collusive or unfair business behavior that restricts free competition. Failure to adhere to these laws could result in significant penalties imposed on both Neovia and the suppliers who violated the law. There are almost no circumstances allowed by law to enter agreements with competitors to fix prices, divide markets or customers, or participate in bid rigging, terms of sale, or activities that affect production output.

6.1 Counterfeit Parts

Suppliers should minimize the risk of introducing counterfeit parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.

6.2 Intellectual Property

Suppliers should respect valid intellectual property rights.

7. WORKFORCE ISSUES / RESPECTING HUMAN RIGHTS

Neovia is committed to maintaining an ethical and fair workplace. We expect all our suppliers to be respectful of human rights, both of their workforce but also within their supply chain. In every Neovia location our employees are expected to treat others with dignity and respect. The same applies to our suppliers and throughout their supply chain. Specifically, suppliers shall comply with all internationally recognized human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work from time to time in force in any part of its supply chain.

7.1 Child Labour and Young Workers

Suppliers must observe the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labour is not tolerated in any form.

7.2 Wages and Benefits

Suppliers must provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices. Such remuneration should be adequate to cover basic needs and enable a decent standard of living for workers and their families, which includes respecting minimum wages, overtime compensation, medical leave, and government-mandated benefits.

7.3 Working Hours

Suppliers must comply with local laws and collective bargaining agreements regarding working hours, where applicable, or should comply with the ILO Standards on Working Time in the absence of relevant local regulations.

7.4 Modern Slavery

Suppliers must prohibit any forms of forced, bonded, or compulsory labour, including human trafficking.

a) *Ethical Recruiting*

Suppliers must not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner, their rights and responsibilities.

7.5 Working Environment

Suppliers shall (a) provide a safe, healthy, and sanitary working environment and comply with all applicable health and safety laws and any other relevant laws where they operate; and (b) not support, engage in, or require any hazardous labour to be performed by any person under the age of 18.

Hazardous labour involves any work, that by its nature or the circumstances in which the work is undertaken, involves the substantial risk of harm to the safety or health of the worker if adequate protections are not taken.

7.6 Freedom of Association and Collective Bargaining

Suppliers shall observe all applicable laws and regulations governing freedom of association and collective bargaining. In so doing, suppliers shall respect, and shall not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

7.7 Non-Discrimination and Harassment

Suppliers should not tolerate any form of discrimination or harassment in respect of employment and occupation, and should provide equal employment opportunities regardless of worker or applicant characteristics such as 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.

7.8 Women's Rights

Suppliers should provide equal opportunity in employment and commit to equal pay for equal work.

7.9 Rights of Minorities and Indigenous Peoples

Suppliers should respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with consideration for the presence of vulnerable groups.

7.10 Land Rights and Forced Eviction

Suppliers should avoid forced eviction and the deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters.

7.11 Grievance Procedures

Suppliers shall ensure their employees have knowledge and access to appropriate disciplinary and grievance procedures.

7.12 Reporting Behavior

Neovia takes all matters of ethics very seriously and its suppliers are strongly encouraged to raise incidents or behaviors that are not in accordance with this code of conduct. Suppliers should have a way for all their employees to anonymously report this either through a hotline or a reporting box which is out of sight of general employees.

7.13 Non-retaliation

Suppliers shall avoid any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly, and protest against their business activities.

7.14 Diversity and Inclusion

Our suppliers and those throughout their supply chain are expected to understand our vision in relation to diversity and inclusion by:

- a) Treating all employees fairly, promoting an inclusive environment on the basis of gender, race, age, sexual orientation, gender identity, disability, faith
- b) Pro-actively encouraging positive mental health and well-being
- c) Looking not only internally but within their supply chain and reporting their supplier diversity initiatives, goals, and spends relating to Neovia

8. ENVIRONMENTAL

Neovia suppliers must understand the currently known environmental hazards and impacts of their businesses, which may be presented to persons, property, and/or the environment in connection with the performance of the services, and be responsible for proactively maintaining an environmentally sound condition over which the supplier has control, as well as, managing those environmental impacts. To that end, we expect our suppliers to:

- a) Collaborate with Neovia to help reduce environmental impacts by, among other things, sharing roadmaps, vision, and activities
- b) Look for cost effective methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions
- c) Above all, ensure that their supply chains fully comply and abide by all applicable environmental legislation and regulations, including laws and international treaties related to (but not limited to) climate change, waste disposal, emissions, discharges, and hazardous and toxic material handling

8.1 Emissions

Our suppliers should implement, document, and track SBTi goals and targets to reduce their Scope 1, 2, and 3, sharing any certification they may have with Neovia around their goals and metrics, along with their emissions in relation to Neovia which again would play into our Scope 3 emissions.

8.2 Water Quality, Consumption & Management

Suppliers should minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges, and prevent potential impacts from flooding as a consequence of rainwater run-off, as required by, and in accordance with, applicable law.

8.3 Air Quality

Suppliers should routinely monitor and disclose, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to air pollution, as required by, and in accordance with, applicable law. Suppliers should assess cumulative impacts of pollution sources at their facilities and mitigate their pollution levels accordingly.

8.4 Responsible Chemical Management

Suppliers should identify restricted substances and minimize or eliminate their use in manufacturing processes and finished products to ensure regulatory compliance and good environmental stewardship. Suppliers should ensure that all legally required permits, licenses, and inspection and testing reports are in place and up to date.

8.5 Circularity

Suppliers should promote closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

8.6 Animal Welfare

Suppliers should respect the five animal freedoms formalized by the World Organization for Animal Health (WOAH) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in any product.

8.7 Biodiversity, Land Use, and Deforestation

Suppliers should protect ecosystems—especially key biodiversity areas—impacted by their operations and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.

8.8 Soil Quality

Where appropriate, suppliers should monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.

8.9 Noise Emissions

Where appropriate, suppliers should monitor and control the levels of industrial noise to avoid noise pollution.

9. RESPONSIBLE SUPPLY CHAIN MANAGEMENT

9.1 Due Diligence

Suppliers should conduct due diligence to understand the source of the raw materials used in their products. Suppliers should not knowingly provide products containing raw materials that contribute to human rights abuses, bribery, and ethics violations, or negatively impact the environment.

9.2 Responsible Sourcing of Raw Materials and Minerals

Suppliers should responsibly source raw materials and minerals used in their products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.



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