



# NOVA FUNDAMENTAL PRINCIPLES AND CODE OF CONDUCT

We, as **NOVA**, it is our fundamental commitment to comply with the principles of business ethics and codes of conduct in all our activities, and to fulfill our part in the light of our basic principles in order to create a safe, healthy, clean and quality working environment and conditions for our employees, stakeholders and other interested parties.

## A. OUR FUNDAMENTAL PRINCIPLES

### 1. Honesty and Trust

Honesty and mutual trust are the basis of all our relationships and business processes inside and outside the company. We act with integrity and honesty in our relations with our employees, customers and all stakeholders, and take care to keep our promises as a company and as an individual.

### 2. Privacy and Information Management

We take care to protect the private information of our customers, employees and all interested parties, information about confidentiality agreements with our customers, intellectual property rights and any other commercial and technical secrets.

### 3. Objectiveness

We provide equal opportunities to our employees and Stakeholders and do not discriminate under any conditions or circumstances based on race, color, gender, religion, opinion, philosophical belief, sect, age and physical disability.

### 4. Conflict of Interest

As Nova, we aim to avoid situations that create a conflict of interest in all our activities. We do not accept gifts of any kind with or without economic value.

### 5. Eligibility

We comply with all laws, regulations and standards, and fulfill our responsibilities and obligations to all interested parties.

### 6. Fair Competition

We believe in fair, free and open competition. We do not accept unlawful practices with competitors, customers and suppliers, and any kind of monopolistic or unfair trade practices, bribery and corruption by our company.



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We know that we must comply with ethical principles as a whole in order to protect the success and reputation of our company and we expect all our employees, suppliers, stakeholders and relevant parties to take care in this regard.

## 7. Sustainability

Social, economic and social corporate sustainability is essential for us while carrying out our activities. In all our activities, together with our stakeholders, we ensure the creation of business environments that benefit society, nature, the environment and all living things. Sustainability and continuous improvement are our priority.

## 8. Participation of Stakeholders

We work in accordance with the law by prioritizing the optimization of the requirements, needs and expectations of our shareholders, employees, customers, suppliers and public institutions.

The opinions and suggestions, participation and open communication of our employees are essential. We know the value of the feedback we receive from our customers and suppliers. We review and improve our processes and provide feedback.

## B. NOVA CODE OF CONDUCT

### 1. Employment is freely chosen.

There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary.

Any fees associated with the employment of workers must be paid by the Nova. Our suppliers are also regularly monitored regarding payment.

### 2. There is Freedom of Association and Right to Collective Bargaining.

In parallel with the accepted ILO conventions; All kinds of freedom of association, collective bargaining rights and legal regulations specified in the Labor Law of the Republic of Turkey are adhered to and applied without exception.

The rights of employees to engage in or refrain from engaging in lawful activities related to establishing, joining or assisting a labor organization are respected, and employees are not discriminated against or penalized for exercising these rights.

Employee representatives are not treated in a discriminatory manner and are given the necessary permissions to perform their representative duties in the workplace.

Individuals representing workers represent workers voluntarily and are elected in a free and transparent manner, without influence from any party.



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## **3. Working Conditions are safe and hygienic.**

NOVA takes the necessary precautions to prevent accidents and injuries that may occur as a result of, related to, or during work, through policies and procedures.

It provides a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

Workers receive regular and recorded health and safety training and such training will be repeated for new or reassigned workers.

NOVA provides access to adequate medical assistance and facilities in the event of illness or injury at work.

## **4. We comply with the Child/Youth/Pregnant Worker working rules in accordance with the law.**

Child labor is not hired or allowed to work under any circumstances.

It is ensured that the working conditions of pregnant and young employees are in full compliance with the labor law.

## **5. We carry out Working Hours / Overtime in accordance with the law.**

Working hours are regulated not to exceed 45 hours per week, as specified in the labor law.

Overtime must be used responsibly, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole.

Total hours worked including overtime does not exceed 60 hours in any 7 day period unless there are exceptional circumstances.

Workers are provided with at least 1 day off in every 7 day period.

There is no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary.

Weekly overtime hours are limited in accordance with current laws and regulations.

## **6. We do not discriminate.**

There is no discrimination of Workers including, but not limited to, hiring, occupation, compensation, access to training, promotion, termination or retirement based on but not limited to race, caste, colour, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.



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It provides equal opportunity and chance for the professional development of the employees without making any gender discrimination.

We oppose the use of sexist, homophobic, racist, speciesist, discriminatory language in all communication process. We promote open, fair, nonviolent forms of communication and adopt and egalitarian communication policy.

We attach great importance to cooperating with equitable and diversified institutions in all relationships with our suppliers, dealers and stakeholders.

## **7. We do not use harsh or inhumane treatment.**

There must be no physical abuse or discipline, threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation including a hostile or offensive work environment.

The peace of the working environment and the happiness of the employees are taken as basis; The dignity and personality of employees are respected, corporate punishment is not imposed; No wage deduction is imposed to discipline the employee; Verbal, physical, psychological harassment, pressure, threats or coercion are not allowed.

We take an intolerant attitude towards all kinds of violence, pressure, bullying and harassment, and we develop business relationships, stakeholder relationships and safe environments free from violence, bullying, pressure and harassment.

The personalities of the employees are respected and the principles of honesty, fair management and equality are adopted in the relations with the employees.

All personal information about employees is protected securely and kept confidential.

## **8. We respect society, the environment and different cultures.**

In all our work, it is essential to contribute to the development and growth of our company, as well as to the development of all our stakeholders, and to develop the sector and ensure sustainability with social responsibility awareness.

Together with our employees, suppliers and all our stakeholders, we aim to provide an accident-free and safe working environment that values people and the environment and we aim to make it sustainable.

In order to protect the environment, our priority is to prevent environmental pollution at its source, support recycling, and use energy and natural resources efficiently.

We respect the right to life of all living things on earth, we protect nature and animals.

We prioritize producing products for our stakeholders from environmentally friendly and recyclable materials, and we try to guide our customers in this direction.



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We strive for the development of our society within the framework of the principle of corporate social responsibility and we support our employees to volunteer for appropriate social activities in which they will take part with social responsibility awareness.

We are sensitive to the traditions and cultures of Turkey and the countries in which we operate, and we act in accordance with all applicable legal regulations.

We attach importance to certification of our applications in order to comply with international standards.

## **9. We value recognition and appreciation.**

It is one of our main priorities to maintain an institutional climate that will reveal the potential of individuals and where everyone can freely express their opinions.

It is essential that the positive actions and success of our employees are accepted, recognized, thanked and appreciated.

Within the framework of the principle of continuous improvement, together with all our managers, we encourage suggestions that will improve business and application methods in a way that will increase quality and customer satisfaction, reduce work accidents, and reduce costs in activities related to quality, occupational health and safety and the environment.

A system that allows our employees to freely express and resolve their workplace complaints without fear of retaliation has been defined and its implementation is guaranteed by all managers.

Our employees know that they have the right to give feedback and express their complaints freely when they are hired, and this defined document is easily accessible by all employees and their representatives.

Timely feedback is provided to all incoming suggestions, complaints and notices, employees' concerns and suggestions are quickly addressed using an understandable and transparent process, and the actions taken are shared with all employees to improve the process and provide feedback.

## **10. We do not tolerate bribery and corruption.**

The offering, paying, soliciting or accepting of bribes or kick-backs is strictly prohibited.

Our employees cannot accept or offer any gifts that would undermine their independence from the other party in their relationships with public employees, customers, suppliers and other business partners.

Our employees take care to avoid situations that may lead to a conflict of interest or be perceived as such, and to create an environment in which gifts are not offered/accepted in such cases.