# CODE OF CONDUCT



Guidelines and Standards of behaving with Integrity and Transparency.

Novaco is committed to conducting its business with ethos, responsibly and at the highest quality. Ethical behavior and compliance with the law is essential for the long-term sustainability of our company. The trust we are enjoying now, has been built over many years and is one of our greatest assets. Each one of us with his/her every day actions affects our company's workplace environment and reputation. That is why it should be safeguarded by all.

This Code of Conduct offers the guidelines and standards of integrity and transparency that must be followed. It does not address every situation and is not to be considered as a substitute for applying common sense and good judgment. When in doubt seek advice from direct supervisor, director, or relevant department. The code applies to all our employees (directors, executives, staff, students, volunteers) and anyone else who performs services for or on behalf of our company. Everybody should implement it when conducting day-to-day business and live up to it in practice. It is expected to be followed by our partners including suppliers, subcontractors, agents, joint venture partners.

# The code

# Accountability

Every employee has the responsibility to ask questions, seek guidance, and report suspected violations of this Code of Conduct. Employees are each held accountable for code of conduct compliance to issues within their control. Breaches of the code of conduct are considered a serious matter and can lead to suspension or termination of employment.

### **Law and Regulations**

Novaco's employees, without exception, will not violate any governmental law, statute, or regulation. During the performance of their professional services, they will act at all times with honesty and fairness.

### **Bribery and Corruption**

Novaco's employees are forbidden to engage in any cash payment, fraud, corruption or bribe to and from anyone with the intent of influencing judgment or decision in connection with an existing or prospective project. Gifts, business meals or other benefits are permissible as long as they are reasonable in nature and decent.

### Client

Novaco's employees will provide their services with competence, skill, and diligence consistent with the interests of our clients and the applicable standard of care. They will keep information and records confidential and protect the proprietary interests of the clients, during and after their employment (except when disclosure is authorized or legally mandated).

#### **Profession**

Novaco's employees will furnish their services consistent to the good engineering and construction practices. They will uphold the standards of their profession with honor and dignity.

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# On the job

Novaco employees will not discriminate on the basis of race, religion, national origin, age, disability, gender, or sexual orientation. They are prohibited to abuse of their position, disclose or use non-public information to seek personal gain or compete with the company.

They will protect all company, customer, and supplier assets (equipment, books, suppliers, records, property) and use them only for legitimate company-approved purposes.

# Quality

Consistent delivery of high-quality services and products are critical to the ongoing success of Novaco. All employees have a duty to exercise their profession with excellence at the level that has been agreed upon by: acting honestly, reducing errors and deficiencies, sharing effective and accurate information, be proud of the end-result. If there is any pressure on sacrificing quality to achieve cost and time targets it is imperative to talk to their direct supervisor or project manager.

## Innovation

All employees will listen, learn, and seek to apply innovative working methods and solutions to new or existing problems. It is the employees' responsibility to participate, protect and reinforce optimization of productivity, collaboration, and communication. If you suspect any issue that needs improvement in the material, workmanship, resources, functionality, aesthetics, processes, coordination notify your supervisor or communicate it to the company's headquarters.

### **Health and Safety**

Novaco's employees have an active role in developing a culture of safety, consistent with the Novaco's Policy on Safety and the Construction & Engineering principles. Each employee has a duty to report workplace conditions or practices that pose a safety hazard or threaten the environment and take actions to minimise such risks.

### Sustainability

All employees are committed to conduct themselves and encourage others in keeping environmental and sustainable business practices, on their construction projects by maximising local labor and suppliers, reducing waste and cost and where possible use construction materials with high recycled contents.

We encourage our employees to promptly report any misconduct, conflict of interest, illegal activity or inappropriate behavior that comes to their attention. Talk to your direct supervisor, project manager or site manager or report anonymously at info@novaco.gr.

All issues reported are treated seriously, discreetly and are strictly confidential.