

# NOVUM

## **Anti-Boycott Policy**

Novum Holdings LLC. and its affiliated and subsidiary companies (collectively “Novum”) are committed to conducting international business in accordance with all applicable U.S. laws prohibiting unauthorized participation in foreign boycotts and other restrictive trade measures (“Anti-Boycott Laws”). These laws govern how Novum conducts business with agents, customers, dealers, distributors, suppliers, and other parties, particularly those with operations in the Middle East, North Africa, and other nearby regions. Novum maintains an Anti-Boycott Policy to promote compliance with these laws. This Policy applies to all Novum employees, officers, directors, agents, consultants, and any other persons acting on behalf of any entity owned or controlled by Novum (“Novum Personnel”) anywhere in the world.

## **Economic Sanctions Policy**

Novum Holdings LLC. and its affiliated and subsidiary companies (collectively “Novum”) are committed to conducting international business in accordance with applicable economic sanctions laws enforced in the United States, the United Kingdom, European Union (“EU”), and other jurisdictions where it conducts business. These sanctions govern how Novum conducts business with agents, customers, dealers, distributors, suppliers, and other parties. Novum maintains an Economic Sanctions Policy to promote compliance with these laws. This Policy applies to all Novum employees, officers, directors, agents, consultants, and any other persons acting on behalf of any entity owned or controlled by Novum (“Novum Personnel”) anywhere in the world.

## **EEO Policy**

Novum will not discriminate in employment action on the basis of a protected status and therefore it is the policy of Novum to provide equal employment opportunity to all individuals regardless of their race, creed, color, religion, gender, age, national origin, physical or mental disability, veteran status, marital status, sexual orientation, military status, genetic information, citizen status, status with regard to public assistance, or any other characteristic protected by law. We are strongly committed to this policy and believe in the concept and spirit of the law. This policy applies to all terms and conditions of employment, including but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

## **Modern Slavery & Human Trafficking Policy Statement**

Novum Holdings LLC has a zero-tolerance approach to any form of modern slavery and human trafficking. We are committed to acting ethically and with integrity and transparency in all business dealings including supply chain and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business. Specifically in the UK, we follow the requirements of section 54(1) of the Modern Slavery Act of 2015.