

novar

# Code of Ethics

Novar 2024



Getting new  
energy done.



# Dear reader,

In the dynamic landscape of energy transition, our business vision revolves around ethical conduct as the catalyst for a sustainable and responsible energy future. We are committed to pioneering eco-friendly solutions, recognizing the importance of community engagement, and respectful dialogue with residents and other stakeholders.

A multifaced approach should ensure that our operations align with the highest ethical standards. Our vision extends beyond profitability, aiming to be a driving force in the shift towards clean energy. We aspire to lead by example, promoting transparency in our supply chains, advocating for fair energy access, and actively participating in initiatives that address climate change.

**Gerben Smit**  
Managing Partner



# Our Commitment to Ethics

At Novar, ethics are the cornerstone of our operations. They guide how we innovate, collaborate, and grow while maintaining the trust of our stakeholders—customers, partners, communities, and colleagues. Ethics are not just rules to follow but principles that inspire accountability, fairness, and mutual respect.

The Novar Code of Ethics defines the principles that underpin our values and provide a framework for ethical decision-making:

We respect one another.

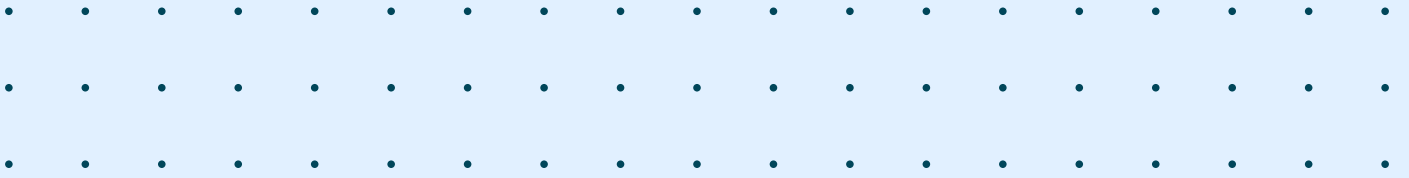
We take responsibility and own our choices.

We act with integrity.

We have the courage to speak up.

We uphold the law.

# Our core values



Acting ethically isn't always straightforward. It often requires the courage to make difficult choices, especially when faced with situations that may not have a clear "right or wrong" answer. In such moments, our core values serve as a compass to guide our decisions:



## Driven

We recognise the urgency of acting now to create a sustainable future, and we take the lead. To achieve our ambitions, we develop innovative solutions where none existed before. From building the world's largest solar carport to pioneering grid integration technologies, we overcome challenges like a 'full power grid' with creativity and determination. For us, 'impossible' is not an option.



## Committed

You are at the heart of everything we do. We work closely with land and roof owners, local residents, and stakeholders because we know collaboration is key to achieving our ambitious goals. For us, involvement means walking this journey together—from the very first contact to the end of a project's lifecycle, even spanning up to 30 years. Through ups and downs, we are in it together.



## Positive

It is easy to view the future with doubt in today's world—but not us. Where others see challenges, we see opportunities. Obstacles may arise, but we're confident we can overcome them. We look ahead with optimism and aim to inspire others to join us in building a sustainable future together.



## Professional

We hold ourselves to the highest professional standards. Our work is defined by expertise, quality, accuracy, consistency, and punctuality. Every decision is driven by professionalism, never self-interest.



## Reliable

At Novar, reliability means keeping our word, being honest, and owning our mistakes. Professionalism thrives through accountability and feedback, as we challenge and support each other to grow and excel.



# Building a Culture of Integrity

At Novar, ethics are a shared responsibility that defines who we are and how we operate. Every one of us plays a crucial role in fostering a culture where respect, integrity, and sustainability thrive. By adhering to our Code of Ethics, we uphold the values that make Novar a trusted leader in the renewable energy sector. Through our collective commitment to ethical conduct, we ensure that our business grows sustainably, earns the trust of stakeholders, and continues to lead the energy transition—today and for generations to come.









How we treat each other

Compliance with laws and regulations

Ethical conduct in business relationships

Whistleblowing and anonymous complaints





## 1

# How we treat each other

## 1.1 Diversity and Inclusion

- At Novar, we recognise and embrace the value of diversity. We believe that our differences make us stronger and more innovative. We are committed to fostering a workplace that promotes inclusion, where everyone feels valued, respected, and empowered, regardless of their background, gender, race, religion, or any other characteristic.
- Novar actively promotes equal opportunities for all employees in hiring, career progression, and training. We do not tolerate any form of discrimination or bias, intentional or unconscious, and we work to remove barriers to inclusion.

## 1.2 Respectful Interactions

- We treat each other with respect, professionalism, and empathy at all times. We recognise that differences in opinion, experience, and background enrich our work environment, and we are committed to creating a culture where every voice is heard.
- Discrimination, harassment, bullying, or any form of abusive behaviour is strictly prohibited. We maintain a zero-tolerance policy towards any actions that create a hostile or offensive work environment.
- Constructive feedback and open dialogue are encouraged across all levels of the organisation. Leaders at Novar are responsible for promoting a respectful, transparent environment where issues can be addressed without fear of retaliation.

## 1.3 Safe Working Environment

- Novar is dedicated to ensuring the safety and well-being of its employees, contractors, and visitors. A safe working environment is not just a legal requirement, but a fundamental right of every employee.
- We comply with all health and safety regulations and continuously monitor workplace conditions to identify potential hazards. Employees are required to follow safety protocols and immediately report any unsafe conditions or incidents.
- Novar works proactively to prevent accidents and ensure that health and safety standards are met across all operational sites.

## 1.4 Open Communication and Collaboration

- At Novar, we believe that open communication is the foundation of trust and innovation. We encourage employees to share ideas, provide feedback, and voice concerns freely, knowing that their input will be valued.
- Collaboration is essential to achieving our goals. We foster a culture of teamwork where employees work together across departments and levels to solve challenges and drive progress.
- Leaders are responsible for creating an environment where communication is clear, consistent, and two-way. Regular team meetings, one-on-one check-ins, and feedback sessions are key to fostering a transparent and collaborative culture.

# 2 Compliance with laws and regulations

## 2.1 Fraud Prevention

- Novar maintains the highest standards of financial integrity. Fraudulent behaviour, including misrepresentation, falsification of documents, or misuse of company resources, is strictly prohibited.
- Employees are required to ensure that all financial records are accurate, transparent, and complete. Novar has systems in place to detect and prevent fraud, including internal audits and control mechanisms.
- Any suspected fraudulent activity must be reported immediately. Novar takes fraud allegations seriously and will investigate promptly, taking disciplinary action where necessary, including termination of employment or legal action.

## 2.2 Anti-Money Laundering

- Novar is committed to preventing the use of our operations for illegal activities such as money laundering. We comply fully with all applicable anti-money laundering (AML) laws and regulations.
- All financial transactions must be transparent, traceable, and legitimate. Employees are expected to conduct due diligence when entering into transactions with third parties, ensuring compliance with all regulatory requirements.
- Any suspicious activity that may be linked to money laundering or other illegal financial practices must be reported to the relevant authorities within Novar, in accordance with our reporting policies.

## 2.3 Anti-Bribery and Corruption

- Novar takes a zero-tolerance approach to bribery and corruption. We do not offer, solicit, or accept any form of bribery, including excessive gifts, payments, or favours that may influence business decisions.
- We comply with all relevant anti-bribery and anti-corruption laws, including the EU Anti-Corruption Directive and relevant national laws. Employees must avoid any activities that could be perceived as corrupt, including offering or accepting improper payments to or from government officials or business partners.
- Any suspected bribery or corrupt activity must be reported immediately. Failure to report such activity can result in severe disciplinary measures.

## 2.4 Adherence to Legal Requirements

- Novar is committed to full compliance with all local, national, and international laws that apply to our operations, including environmental regulations, employment laws, and industry standards.
- Non-compliance with legal requirements can result in disciplinary action, including dismissal. In cases of serious non-compliance, Novar may refer the matter to external authorities for further investigation.



# 3

# Ethical conduct in business relationships

## 3.1 Conflicts of Interest

- Employees must avoid situations where their personal interests conflict, or appear to conflict, with the interests of Novar. Personal gain should never take precedence over the company's business objectives.
- Common examples of conflicts of interest include in personal business activities during work hours or using company resources for personal benefit.
- Any potential or actual conflict of interest must be disclosed to a manager or the legal department as soon as it arises. Employees are expected to act with integrity and impartiality, putting the interests of Novar first.

## 3.2 Gifts and Entertainment

- Offering or receiving gifts, entertainment, or other benefits can create the appearance of a conflict of interest and may influence business decisions. Novar's policy on gifts and entertainment is designed to ensure transparency and fairness in all dealings.
- Employees may only offer or accept gifts or entertainment that are modest, appropriate, and aligned with business objectives. Any gifts that exceed €50 must be reported to management and, if necessary, declined.
- Exchange of gifts or entertainment that could be perceived as bribes or improper influence, particularly when dealing with government officials or regulatory bodies, is prohibited.

## 3.3 Confidentiality of Information

- Safeguarding confidential information is crucial to maintaining Novar's competitive advantage and the trust of our stakeholders. Employees are required to protect all proprietary information, including trade secrets, business strategies, financial data, and intellectual property.
- Confidential information must not be disclosed to any unauthorised parties, whether inside or outside the company. This obligation extends beyond the duration of employment, and any breach of confidentiality may result in legal action.
- Novar takes data security seriously and has robust measures in place to prevent unauthorised access, loss, or misuse of sensitive information.

## 3.4 Privacy of Customers and Employees

- Protecting the privacy of our customers and employees is a top priority at Novar. We are committed to handling all personal data in accordance with data protection laws, including the General Data Protection Regulation (GDPR).
- Personal data must be collected, processed, and stored securely, and only used for legitimate business purposes. Employees handling personal information are required to follow strict protocols to ensure data security.
- Any data breach, including unauthorised access, loss, or theft of personal information, must be reported immediately. Novar has clear procedures in place for managing and mitigating data breaches, in line with legal requirements.

# 4

# Whistleblowing and anonymous complaints

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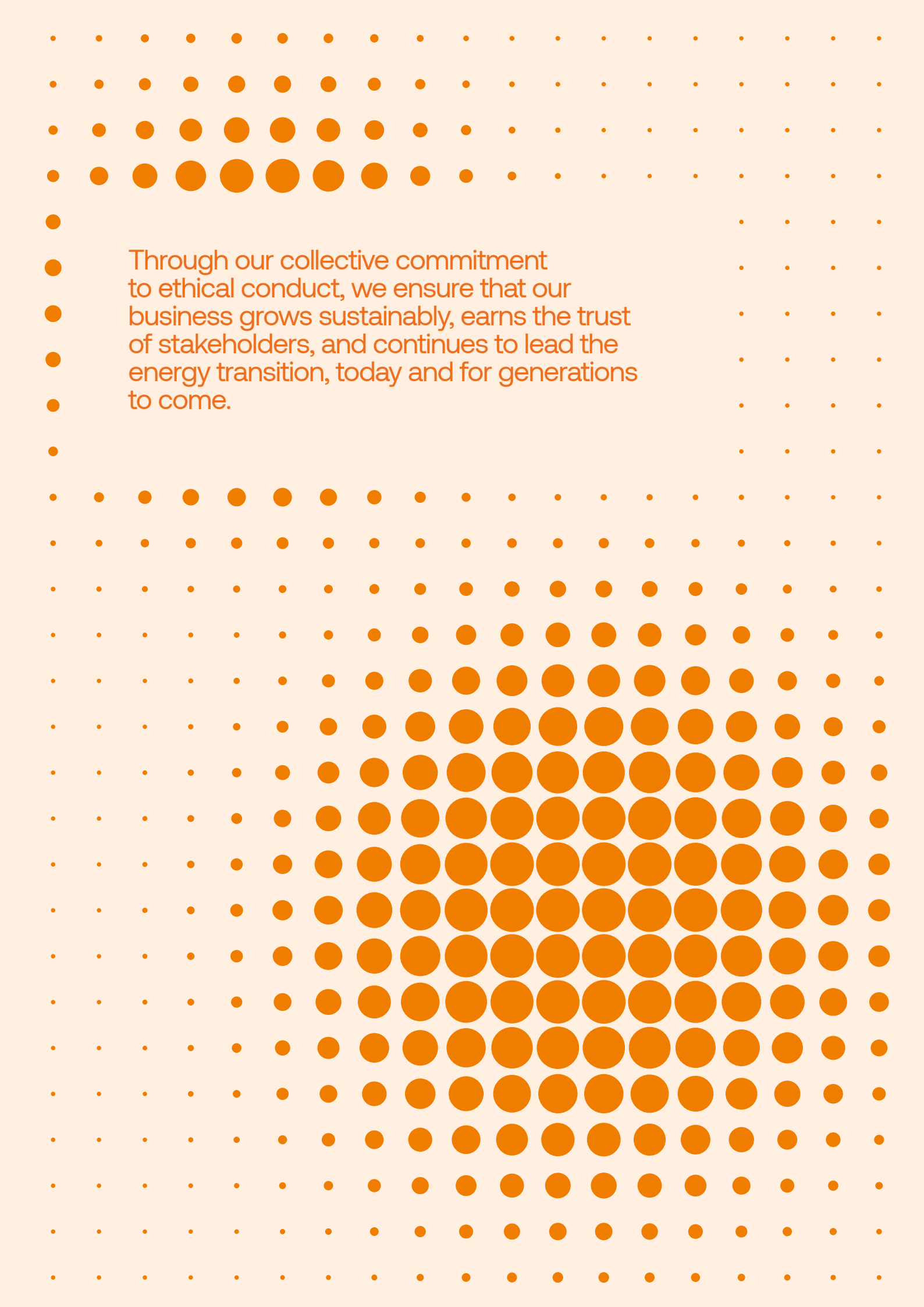
## 4.1 Whistleblowing Policy

- At Novar, we encourage a culture where employees feel empowered to report unethical behaviour or violations of company policies. We provide an anonymous whistleblowing channel where employees can raise concerns without fear of retaliation. Whether it's a case of misconduct, legal non-compliance, or a safety issue, every complaint will be taken seriously and investigated thoroughly.

## 4.2 Anonymous Complaint Process

- Employees can file complaints anonymously if they are uncomfortable reporting issues openly. The company is committed to protecting the anonymity of whistleblowers and ensuring that no one faces retaliation for coming forward. Our complaint system is designed to handle issues confidentially and with integrity.





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