

# CODE OF CONDUCT

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**2022**

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# MANAGEMENT STATEMENT

We always set ourselves the highest standards and work each day to meet them responsibly.

This Code of Conduct outlines how we do this and reflects the values we follow and promote within our company and community. We recognize that our responsibilities extend beyond our own corporate doors. We aim to promote and implement the values described in this Code of Conduct along our entire value chain. Our Corporate Social Responsibility Policy is integrated into this Code of Conduct.

Yours sincerely,

*M. Rehan*



# CORE VALUES

Our goals are to continue strengthening the foundation from which we grow, our people. To do so, we accept our role as a community leader and ensure our values are followed within our organizational reach. We are convinced, this is the most effective way to ensure a sustainable growth model for all stakeholders to benefit.

Growing together with our community means investing resources and attention to social, environmental and economic impacts of our work. We will continue to do so while enjoying the long-term relationships that come from our actions.

# ENFORCING THE CODE

Our CSR policy is more than just words in a document. We actively strive for 100 percent compliance with our Code of Conduct, both within our company and with our suppliers. To ensure good business practices and adherence to our values, we carefully screen all members. Regular employee training includes fostering a work culture that promotes open discussion of issues related to our Code of Conduct, as well as addressing dilemmas in the workplace.



# RESPECTING HUMAN RIGHTS

**Novaroma's employees are the engine of our company. Their safety, health, happiness and overall well-being are our utmost priorities. That is why we enable individual development through training and provide appropriate tools and resources for all employees.**

**We maintain a zero-tolerance policy against discrimination of any kind. We stand firmly and resolutely against child and forced labor, both within our own company and along the entire supply chain!**

- Ensuring stable working conditions is part of our contractual standards. In doing so, we want to ensure that a fair and dignified life is achievable for all our employees. We discuss all conditions verbally with our employees in advance and finally agree on a written contract. This is to make our employees aware of their employee rights.
- In the case of stable employment, we offer constant working hours and, if necessary, overtime for those who are available.
- We follow national and international standards. Though we see it as our obligation to constantly check whether or not they are adequate and in favor of our employee's needs.



# LABOR PRACTICES

**Our employees are the basis of our success, we value their health, safety, and general well-being. We conduct regular training for all employees to remind them of their duties, improve work processes and ensure personal development. Protective equipment, proper job tools, and training all lead to a company culture that respects the need for a safe work environment.**

- Compensation wage laws are not always sufficient, so we choose to pay a livable wage to our team. Building strong and lasting relationships with buyers who share our values is very important to us as we work together to raise the standard of living for all members of our organization. The additional cost of promoting materials that ensure a decent life for stakeholders at all levels enables us to retain team members and provide them with a fulfilling life outside of the workplace.



# LABOR PRACTICES



- A common dilemma faced by employees is the lack of a safe work environment. This should not be a cause for concern. No price can be placed on an employee's health and wellbeing. We do everything in our power to mitigate workplace hazards. Protective work equipment, job tools, & training are supplied regularly. We have had various consultations to ensure our work space is fully equipped and all elements are functioning properly through frequent maintenance and inspection schedules. This leads to a company culture respecting the need for a safe working environment.
- Our company is continuously reducing our environmental impact, this is our contribution to larger efforts addressing environmental concerns and to preserve a clean and healthy environment.

# THE ENVIRONMENT

**Our employees are the basis of our success, we value their health, safety, and general well-being. We conduct regular training for all employees to remind them of their duties, improve work processes and ensure personal development. Protective equipment, proper job tools, and training all lead to a company culture that respects the need for a safe work environment.**

- Water is one of our most valuable resources. Especially when it comes to food production, the sustainable use of water is a top priority for Novaroma. Through technical assistance, we can convert farms from field flooding irrigation to more efficient techniques such as drip or pivot irrigation. Water conservation also allows us to minimize other agricultural inputs and soil runoff.
- Energy from hydrocarbons produces a large range of pollutants. We are aware of this and monitor our consumption to find areas where we can improve efficiency and save energy. Regular factory audits include monitoring thermal and carbon emissions from the machines to determine energy efficiency. Heat sources are easily identified and inefficiencies are rectified. Upgrading, modifying, isolating and repurposing equipment are all methods that have been used in the past to respond to audit suggestions.



# FAIR OPERATING PRACTICES

**Our company believes in fair business practices to protect all stakeholders. Our loyal customers, suppliers and employees are respected and treated as indispensable business partners. We do not engage in illegal activities, corruption or infringe on the rights of any parties within our network and/or organization.**

- We respect the property rights of others and do not commence activities until the necessary formal approval and consent from the government and local partners have been given.
- We do not tolerate any form of corruption and do not engage with any 3rd parties who suggest a corrupt behavior.
- We are firmly against industry collusion to ensure fair and honest business practices. Our market position carries a responsibility to operate with fair business practices that we carry with pride.



# CUSTOMER INTERESTS

**Our customers can count on our organization to provide the best quality and best services.**

- We guarantee the safety of our products when they enter the market. The production, trade and consumption of our products have no negative impact on human health or the local environment.
- We respect our customers' privacy and ensure confidentiality for any business conducted.
- Any matters related to customer support, customer service, or dispute resolution are handled in a fair and timely manner to respect our customers' time, concerns and questions.



# SUPPLY CHAIN RESPONSIBILITY

**We are committed to long-term relationships with our supply chain partners. All of our partners are screened to ensure they share our values and vision to improve economic, social, and environmental elements within their direct and extended network.**

- Our Code of Conduct has been created as a manual that can be used by Novaroma as well as our supplier's network. It provides direction and guidance of best business practices to establish a certain behavior, while conducting day-to-day operations. Contractual obligations and audits are put in place to ensure adherence to our Code of Conduct policy.
- Along with contractual agreements, we provide technical support and guidance at the farm level to ensure labor rights are honored, 'Good Agricultural Practises' are followed with water resource management and IPM programs are put in place.



# CONTACT



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