

## Anti-fraud and corruption

Novus Altair has a 'zero tolerance' policy towards fraud, bribery and corruption. We will always investigate and seek to take disciplinary and /or legal action against those who commit, or assist anyone committing, fraud or any other improper activities in our operations.

Novus Altair is committed to:

- developing an anti-fraud culture across the organisation
- seeking to minimize the opportunities for fraud, bribery and corruption
- having effective systems, procedures and controls in place to enable the prevention and detection of fraud, corruption and bribery
- ensuring that its staff are aware of the risks of fraud, bribery and corruption and understand their obligations to report any actual or suspected incidents of fraud, bribery or corruption
- taking all reports of fraud, bribery and corruption seriously, and investigating them proportionately and appropriately
- meeting its obligations to report any incidents of fraud, bribery and corruption to appropriate external authorities.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

Novus Altair will review this policy statement annually to reflect new legal and regulatory developments and ensure good practice.

Signed Adnan Niazi

Date 1/5/17

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