BRIBERY PREVENTION POLICY

Background

Novus Altair Limited has a commitment to high legal, ethical and moral standards. All members of staff are expected to share this commitment. This policy is established to facilitate the development of procedures, which will aid in the investigation of fraud and related offences.

Company already has procedures in place that reduce the likelihood of fraud occurring. These include standing orders, documented procedures and documented systems of internal control and risk assessment. In addition the management tries to ensure that a risk (and fraud) awareness culture exists in this organisation.

This document is intended to provide direction and help to those officers and director who find themselves having to deal with suspected cases of theft, fraud or corruption. These documents give a framework for a response and advice and information on various aspects and implications of an investigation. These documents are not intended to provide direction on prevention of fraud.

Fraud Policy

This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties with a business relationship with this organisation. Any investigative activity required will be conducted without regard to any person's relationship to this organisation, position or length of service. Actions Constituting Fraud

Fraud comprises both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting the financial statements by one or more individuals among management, staff or third parties. Guidance is contained in the Appendix to this policy.

All Managers and Supervisors have a duty to familiarize themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.

The management is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud within the organisation, and to the rigorous investigation of any such cases.

The management wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore it is also the management's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions.

All members of staff can therefore be confident that they will not suffer in any way as a result of reporting reasonably held suspicions of fraud. For these purposes reasonably held "suspicions" shall mean any suspicions other than those, which are raised maliciously and found to be groundless. The organisation will deal with all occurrences in accordance with the Public Interest Disclosure Act.

Although the Bribery Risk has already been conducted, it will be updated and organization will be reviewed for this risk on an annual basis. Regular monitoring will be carried out by management and director against bribery risk and work partners will also be analyzed if and when required.



Signed…….

Position…DIRECTOR…….

Review/Issue Date…03/07/2026……..

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