

# Novah Group Ltd

# Anti-Bribery, Corruption & Competition Policy

**Approved by:** Craig Chalmers

**Job Role:** MD

**Signed:** *C. Chalmers*

**Date:**

**This policy must be reviewed by the following date:** Aug 2, 2024

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<b>Review Date:</b>	Aug 2, 2024

## General Statement of intent: Anti-Bribery, Corruption & Competition

It is the Policy of the Novah Group Ltd to ensure that our business is conducted in accordance with competition law and the Bribery Act 2010 while operating in an ethical, professional, fair, honest, and open manner.

Novah Group Ltd has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, fee, reward, or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

Novah Group Ltd opposes all forms of bribery, corruption and anti competitive behaviour, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the Novah Group Ltd Company Policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage employees, subcontractors, and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.
- Understand how bribery may occur during the Novah Group Ltd operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

Additionally, we will ensure that we do not take part in any of the following anti-competitive behaviour:

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- Joint selling or purchasing with competitors.
- Price fixing with retailers or suppliers.
- Keeping an exclusivity period in period of over 5 years.

Additionally, we will take all necessary steps to ensure that we are compliant with the requirements of the Competition and Markets Authority (CMA) and will implement best practice wherever possible.

### Third Party Payments

Third-party payments may include but are not limited to political contributions, charitable donations and sponsorship. Novah Group Ltd does not make contributions or donations to political organisations or independent candidates, nor does it incur any political expenditure. We respect the right of individual personnel to make personal contributions, provided they are not made in any way to obtain advantage in a business transaction. Any charitable donations or sponsorship are given according to Company policy and care must be taken to ensure such donations are never used to gain improper influence.

### Facilitation Payments

Facilitation payments are not prohibited under any circumstances. These are any payments, usually small cash payments made to low-level officials, as a bribe to secure or expedite the performance of a routine or necessary action or level of service. Novah Group Ltd personnel and Business Partners should report, via the appropriate communications channel, any instance where a facilitation payment is alleged to have been paid on the Company's behalf.

- Colleagues or personnel from the Third Party are in attendance;
- The Third Party does not pay for any associated accommodation or (more than trivial) travel expenses;
- The entertainment or hospitality and/or acceptance of it could not be interpreted as a reward, inducement or encouragement for a favour or preferential treatment;
- The frequency of hospitality or entertainment invitations from a Third Party is not excessive i.e., an individual colleague should not accept hospitality or entertainment invitations from the same Third Party more than once or twice in any financial year;
- It is proportionate in the context of the business relationship.

In addition, colleagues should always consider if the Third Party's behaviour and reputation is in line with Novah Group Ltd values, prior to accepting any invitations for hospitality or entertainment.

### Travel Expenses

In certain circumstances, third parties may offer to pay for travel and / or accommodation where no hospitality or entertainment is being provided. This could arise, for example, in the context of business meetings or conferences overseas. If the travel and accommodation is necessary for the purpose of obtaining or seeking clear business benefits for Novah Group Ltd, it is acceptable to allow a supplier or conference host to pay as long as the travel and accommodation is not lavish (e.g luxury hotels or first class travel) and there are no grounds to suggest any intention to induce or reward inappropriate conduct.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges. It is the responsibility of all management levels to ensure that those reporting to

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them understand and comply with this policy.

### Anti-Competitive Behaviour

Additionally, we will ensure that we do not take part in any of the following anti-competitive behaviour:

- Keeping an exclusivity period of over 5 years.
- Joint selling or purchasing with competitors.
- Price fixing with retailers or suppliers.

### Sign Off & Approval

**Approved by:** Craig Chalmers

**Job Role:** MD

**Signed:** *C. Chalmers*

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