Anti-bribery and Corruption Statement

This statement sets out the approach NOV8 Consulting has taken to date throughout the current and future financial years, with the aim of ensuring all business is conducted ethically, honestly and with integrity.

Business Activities

All our consultants rely upon this statement to identify, prevent, and address bribery and corrupt practices in every jurisdiction in which NOV8 Consulting operates. This statement applies to all our staff, directors, contractors, consultants, and other third parties (collectively referred to as Personnel) acting on behalf of NOV8 Consulting, regardless of their workplace location.

Our Core Values

Integrity: All Personnel must always act with honesty and integrity.

Transparency: We advocate openness in our all-business dealings. Material information must be disclosed appropriately, and financial records must accurately reflect business activities.

Accountability: All Personnel are accountable for their own conduct and must be aware that corrupt acts or failures to prevent corruption may result in personal criminal liability as well as disciplinary action.

Legislation

NOV8 Consulting is committed to ensuring compliance with applicable anti-bribery legislation, including but not limited to the following:

- The Bribery Act 2010 (United Kingdom) – including the corporate offence of failing to prevent bribery
- The OECD Convention on Combating Bribery of Foreign Public Officials
- Any local anti-bribery and corruption laws applicable in countries where NOV8 Consulting operates
- Any anti-money laundering laws applicable in countries where NOV8 Consulting operates

Identification of bribery and corrupt policies, together with steps taken to prohibit conduct

Bribery: The offering, promising, giving, accepting, or soliciting of an advantage (financial or otherwise) as an inducement for an action that is illegal, unethical, or a breach of trust. It includes both direct and indirect payments, whether in cash or in kind.

Facilitation Payments: Unofficial payments made to secure or expedite routine government actions. NOV8 Consulting prohibits facilitation payments, regardless of size or local custom.

N.O.V8 Consulting Ltd
Pre-construction Consultants

Public Official: Any person holding a legislative, administrative, or judicial position of any kind in any country, whether appointed or elected, as well as any person who performs a public function or works for a public international organisation.

Corruption: Dishonest, unethical or fraudulent conduct by individuals with a position of authority in the business. This includes bribery, fraud, embezzlement, extortion, money laundering, abuse of position or conflict of interest undisclosed and properly managed.

Due Diligence

NOV8 Consulting will undertake appropriate due diligence on third parties, including clients, suppliers, agents, and business partners, before entering into agreements. This includes assessing the bribery and corruption risk associated with each relationship and taking proportionate steps to manage that risk.

Prohibited Conduct

All Personnel must adhere to never:

- Offering, giving, requesting, or accepting any bribe or corrupt payment, whether in cash or in kind
- Using a third party, agent, or intermediary to offer or accept a bribe on their behalf
- Making facilitation payments of any kind
- Engaging in any form of kickback arrangement
- Offering or accept gifts, hospitality, or expenses that could be considered improper or that could influence business decisions
- Threatening or retaliating against individuals who have refused to participate in bribery

Conflict of Interest

A conflict of interest arises when personal interests could influence professional decision-making. Declarations will be recorded in the firm's Conflicts of Interest Register and reviewed by the Board.

All Personnel must adhere to the following:

- Avoid situations where their personal interests' conflict with those of NOV8 Consulting or its clients
- Declare any actual or potential conflict of interest to their line manager or the Managing Director
- Refrain from participating in any decision where a conflict exists until appropriate management measures have been agreed

Gifts or Hospitality

Any gift or hospitality that does not meet the following criteria must be declined and reported to the designated compliance contact without delay:

- Be modest and proportionate in value
- Not be given or received in circumstances that could be perceived as an attempt to influence a business decision
- Not be made in cash or cash equivalents
- Be transparent and properly recorded in the Gifts and Hospitality Register
- Be approved by a line manager or director in advance where the estimated value exceeds £50

Fraud Prevention

NOV8 Consulting is committed to ensuring compliance with fraudulent business activities:

- Maintaining robust internal financial controls and segregation of duties
- Conducting regular reconciliations and management reviews of our financial data
- Verifying the identity and credentials of our clients, suppliers, and business partners
- Applying heightened scrutiny to unusual or high-value transactions
- Ensuring all our expenses are properly authorised, supported, and reflect genuine business activity
- All our payments are properly authorised and documented
- We maintain adequate supporting documentation for all business expenditure
- We report any unusual payment instructions or suspicious transactions immediately

Charitable Donations

NOV8 Consulting will not make political donations or contributions on behalf of the firm. Any charitable donations must be properly authorised, transparently recorded, made directly to the recipient organisation, and will not be used as a mechanism for corruption.

Sanctions

NOV8 Consulting will comply with all applicable sanctions and export control. Personnel must not knowingly engage with sanctioned individuals, entities, or jurisdictions, and must report any concerns regarding potential sanctions exposure to the Managing Director immediately.

Reporting

NOV8 Consulting assures accurate financial records to detect and prevent bribery:

Any Personnel who suspect bribery, corrupt conduct, or a breach of this policy is strongly encouraged to raise their concern promptly. Reports can be made to a line manager, the Managing Director, or through the firm's confidential whistleblowing channel.

NOV8 Consulting is committed to ensuring that no individual suffers any detrimental treatment as a result of raising a genuine concern about bribery or corruption in good faith. Any such retaliation will itself be treated as a disciplinary matter.

Training and capacity building

NOV8 Consulting will provide appropriate training to all Personnel to help them recognise and meet their obligations under anti-bribery and anti-corruption legislation. Training will form part of staff induction programmes and will be refreshed periodically, and in any event at least annually.

Non-Compliance Breach

Breach of this statement will be treated as a serious disciplinary matter and may result in summary dismissal. Bribery and corruption are criminal offences that can result in imprisonment, unlimited fines, and significant reputational damage for both individuals and NOV8 Consulting as a business. NOV8 Consulting reserves the right to report suspected criminal conduct to the appropriate authorities.

About this statement

This statement will be reviewed at least annually by the Board of Directors and updated to reflect changes in legislation, regulatory guidance, and the firm's risk profile.

For and behalf of the NOV8 Consulting Executive Board

Neil Porter
Managing Director
April 2026