

novi

Code of Conduct

1. Introduction and Scope

This Code of Conduct sets out the standards of behaviour and business ethics that Novi (Forward Ladies Limited) applies in all its business activities, including work delivered for clients and their supply chains. It reflects the standards commonly expected by our clients' own supplier codes of conduct and is reviewed and updated as needed.

Novi (Forward Ladies Limited) is a small limited company. Responsibility for adherence to this Code, and for addressing any concerns raised under it, rests with the director, and this Code applies equally to all employees, associates and subcontractors engaged by the business.

2. Business Integrity

We conduct all business honestly, fairly and transparently.

- We do not offer, give, solicit or accept bribes, kickbacks, or any improper payment or benefit intended to influence a business decision.
- We do not make facilitation payments.
- Any gifts or hospitality given or received in the course of business are modest, appropriate, transparent, and never intended to improperly influence a decision.
- We maintain accurate, complete and honest business records, including invoices and expense claims.

3. Confidentiality and Information Security

We treat all client, participant and third-party information as confidential and protect it appropriately. Full detail on how we handle confidentiality is set out in our standalone Confidentiality Policy, and how we handle data and information security is set out in our Cyber Security & Data Protection Policy.

4. Conflicts of Interest

- We conduct our business free from conflicts of interest wherever possible.
- Where a potential conflict of interest arises (for example, a personal or financial connection to a client decision), it is disclosed promptly to the relevant client contact and appropriately managed.

5. Human Rights, Diversity and Fair Treatment

- We do not use or support child labour, forced labour, or any form of involuntary or bonded labour, in our own operations or those of any subcontractor we engage.
- Any employees, subcontractors, associates or freelancers engaged by us are paid fairly and at least in line with applicable minimum wage requirements, and any working hours arrangements comply with applicable law.

Our full approach to equality, diversity and inclusion — including our commitment under the Equality Act 2010, our approach to equity, and how we handle complaints of discrimination or harassment — is set out in our standalone Equality, Diversity & Inclusion Policy.

Our approach to pre-employment checks, onboarding, ongoing personnel security, and leavers is set out in our standalone Personnel Security Policy.

6. Working with Clients, Partners and Subcontractors

- We only engage subcontractors, associates or partners whose conduct and standards are consistent with this Code.
- Where we engage a third party who may access client data or represent us in delivering a client engagement, we take reasonable steps to ensure they understand and meet the standards in this Code.

7. Legal and Regulatory Compliance

- We comply with applicable UK law relevant to our business, including data protection (UK GDPR), employment, and tax legislation.
- We do not engage in or facilitate tax evasion, and all invoices and contractual documents accurately reflect the commercial arrangement in place.
- We comply with competition law and do not coordinate market conduct with competitors in a way that restricts fair competition.
- Where personal data is transferred outside the United Kingdom — including to associates, facilitators or speakers engaged internationally — such transfer is treated as a restricted transfer under Chapter V of the UK GDPR and is made only where the destination is subject to UK adequacy regulations, or where appropriate safeguards (such as the UK International Data Transfer Agreement or an equivalent addendum to the EU Standard Contractual Clauses) have been put in place, or another lawful transfer mechanism applies.

8. Political Activity and Lobbying

Novi (Forward Ladies Limited) does not make corporate donations or contributions to political parties, campaigns, or closely-associated organisations, and conducts any interactions with government bodies or representatives honestly and transparently.

9. Raising Concerns

Anyone with a concern about a breach of this Code — whether a client, participant, subcontractor or member of the public — is encouraged to raise it directly with Griselda Togobo at griselda.togobo@wearenovi.com. Concerns will be treated seriously, investigated appropriately, and raised in good faith without fear of retaliation.

10. Review

This Code is reviewed at least annually by Griselda Togobo, and updated as our business or client requirements evolve.

Approved by: Griselda Togobo Date: 12 August 2026