

Anti-Bribery Policy

1. Purpose

The Unite Group plc is committed to zero tolerance of bribery and corruption. This policy extends to all of the Group's dealings and transactions in which it or its subsidiaries and associates operate.

2. Scope

This policy is given force by the Anti-Bribery programme set out below, which will be regularly reviewed and, as appropriate, revised. All directors and employees of the Group are required to comply with this policy as it applies to them.

3. Anti-Bribery programme

The Chief Executive shall have overall responsibility for the Group's Anti-Bribery programme and the Company Secretary shall have responsibility for implementation of the programme.

- The Group has a **Code of Ethics** that emphasises its zero tolerance of bribery and the Group's commitment to conducting its business in accordance with the highest standards of business and personal ethics.
- The Group has a **Whistleblowing** channel through which employees may report (anonymously, if they wish), any concerns they may have regarding suspected illegal or improper conduct, including, but not limited to, bribery.
- The Group has a **Gifts and Hospitality Policy** which specifies what types of gifts and hospitality are prohibited and relevant approval/notification thresholds. Failure to comply with the policy is a disciplinary offence.
- All employees are notified and trained on the Group's Anti-Bribery programme as relevant for their roles, including as part of the employee induction.
- Risk assessments in relation to the risk of bribery in the Group's business units and relevant support functions are undertaken and reviewed as necessary. As required, existing policies or procedures will be tightened, or new policies and procedures adopted, to mitigate the risk of bribery occurring within the Group.

- Appropriate due diligence will be undertaken in relation to prospective suppliers, contractors and consultants for contracts above specified levels. All such suppliers, contractors and consultants are required to have anti-bribery policies of their own which are at least as rigorous as those of the Group.
- This policy is reviewed annually and when considered necessary, appropriate changes will be implemented.