

Anti-Fraud Policy

1. Purpose

The Unite Group plc operates a zero-tolerance approach to fraud and the Board and Executive Committee are committed to its prevention and to maintaining a culture of integrity, transparency and accountability.

The Economic Crime and Corporate Transparency Act 2023 (ECCTA) introduces a new corporate offence: failure to prevent fraud. Under this legislation, the Unite Group may face criminal liability if an employee, contractor, agent, partner or other associated person commits fraud for the company's benefit and we do not have reasonable fraud prevention procedures in place.

This policy sets out our expectations of employees in relation to the prevention, detection and response to fraud. The policy extends to the entirety of the Group's business and operations and all dealings and transactions in which the Unite Group or any of its subsidiaries or joint ventures are involved.

2. Scope

All directors and employees of the Group are required to comply with this policy. The policy also applies to suppliers, contractors, consultants, agency workers and anyone who provides services to the Group.

This policy is supported by a number of other Group policies, alongside which it should be read together. This includes:

- Code of Ethics
- Anti-Bribery Policy
- Whistleblowing Policy
- Gifts & Hospitality Policy
- Supplier Code
- Share Dealing Code
- Corporate Criminal Offence Policy (preventing the facilitation of tax evasion)

3. What is fraud?

Fraud means any intentional act or omission designed to deceive or mislead resulting in a dishonest advantage or loss to others. Fraud can take a variety of forms. Examples of fraud in the workplace include but are not limited to:

- Offering or accepting a bribe or kickback
- Falsifying records, for example by manipulating financial statements and corporate reporting
- Diverting payments, for example by issuing false invoices
- Stealing or misusing company funds or property
- Abusing position or access for unauthorised benefit
- Using a colleague's personal information to gain access to resources
- Submitting false insurance claims to receive fraudulent payouts
- Falsifying work hours and expense claims to dishonestly inflate compensation
- Making representations that you know to be untrue or misleading to secure employment, promotion or a contract
- Failing to disclose information where there is a legal duty to do so; and
- Failing to disclose a conflict of interest or other relevant information that influences business decisions or results in personal gain.

4. Responsibilities

We are all responsible for ensuring that fraudulent activity and corruption do not take place within our business. Every employee has a duty to act with integrity, raise any concerns and help maintain a culture of honesty and transparency.

Employees must...

- Ensure they understand and comply with this policy
- Report any concerns or suspicions arising from unusual events or transactions that could be indicators of fraud
- Pause any transaction that raises suspicions of potentially fraudulent activity
- Complete the Preventing Fraud and Tax Evasion training assigned to them in a timely manner.

Management must...

- Maintain awareness of internal policies and procedures
- Maintain a strong system of internal controls
- Ensure that concerns raised are investigated promptly.

5. Fraud prevention

We regularly assess the risk of fraud and implement clear procedures and appropriate internal controls to prevent and detect fraud. This includes:

- Training employees as relevant for their role to ensure they are alert to unusual events or transactions that could be indicators of fraud
- Undertaking periodic risk assessments in relation to the risk of fraud in the Group's business units and relevant support functions and testing controls. As required, existing controls, policies or procedures will be refined, or new ones adopted, to address emerging threats, mitigate the risk of fraud occurring and ensure compliance with relevant legislation
- Undertaking appropriate due diligence in relation to prospective employees, suppliers, contractors and consultants, and ensuring that no account is opened unless due diligence has been successfully completed.

6. Reporting concerns

If you suspect or become aware that a fraud or irregularity has occurred, you must report it to the Company as soon as possible. This can be done through your line manager, to the People team or the Company Secretary.

If you are not comfortable with any of the above three options, we also provide an independent, confidential reporting service. This service is available 24 hours a day and allows you to report your concern anonymously by calling 0800 069 8754 or visiting www.unitestudents.ethicspoint.com.

All reports of suspected fraud are taken seriously and will be promptly and thoroughly investigated in accordance with our Whistleblowing Policy. We are committed to a safe and supportive environment for raising concerns and no employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training will not be prejudiced as a result of raising a legitimate concern.

7. Consequences of fraud

Any employee found to have committed fraud will be subject to disciplinary action, which may result in termination of employment, and referral to law enforcement for criminal prosecution.

Fraudulent activity by suppliers and other third parties may result in immediate termination of the contact and referral to the relevant authorities.

8. Review

This policy is reviewed annually and when considered necessary, appropriate changes will be made.

Reviewed October 2026