

# Anti-Fraud Policy

## 1. Purpose

The Unite Group plc operates a zero-tolerance approach to fraud and is committed to maintaining the highest standards of integrity and accountability. This policy outlines our commitment to preventing, detecting and responding to fraud. This policy extends to all of the Group's dealings and transactions in which it or its subsidiaries and associates operate.

## 2. Scope

All directors and employees of the Group are required to comply with this policy as it applies to them.

This policy is also supported by a number of other Group policies which it should be read together with, including:

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

## 3. What is fraud?

Fraud refers to any intentional act or omission designed to deceive others and covers a wide range of irregularities to gain a dishonest advantage. Examples of fraud include, but are not limited to:

- Financial fraud and the manipulation of financial statements or false invoices
- Fraud by abuse of position
- Identify theft such as using someone else's personal information to commit crimes or gain access to resources
- Insurance fraud and the making of false claims to receive insurance payouts
- Payroll and expense fraud which includes falsifying work hours and expense claims to receive improper compensation
- Making representations which you know to be untrue or misleading, and
- Failure to disclose information where there is a legal duty to do so

## 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

- Ensure they understand and comply with this policy
- Raise any concerns, such as unusual events or transactions which could be indicators of fraud
- Complete the Preventing Fraud and Tax Evasion training assigned to you

### Management

- Raise 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 appropriate internal controls to prevent and detect fraud. This includes:

- Training employees as relevant for their role to ensure employees are alert to unusual events or transactions which could be indicators of fraud
- Risk assessments in relation to the risk of fraud 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 fraud occurring within the Group
- Appropriate due diligence is undertaken in relation to prospective employees, suppliers, contractors and consultants.

## 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](http://www.unitestudents.ethicspoint.com).