

## THE UNITE GROUP PLC

### ANTI-BRIBERY POLICY

The UNITE Group plc (the “Company” or the “Group”) is committed to a zero tolerance of bribery and corruption. This policy extends to all the Group’s dealings and transactions in which it or its subsidiaries and associates operate. This policy is given force by the procedures 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. 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 shall adopt 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 shall maintain an independent “whistle blowing” 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.
- A Gifts and Hospitality Policy shall be adopted by the Group. That policy will require the maintenance of a Register of Interests in which directors and employees will be required to record gifts or hospitality (above specified levels) received or given in connection with the business of the Group. The policy will also require that line manager approval is required before gifts or hospitality above specified levels may be given or received. The receipt or giving of gifts or hospitality above specified levels will be prohibited. Failure to abide by the policy will be a disciplinary offence.
- All employees will be made aware (through relevant means of communication) of the Group’s Anti-Bribery policies as they affect them. Such policies will form part of the Group’s induction process. Employees will be required to confirm in writing that they have read and understood the policies.
- Risk assessments in relation to the risk of bribery in the Group’s Business Units and relevant support functions will be undertaken annually and will be reviewed six monthly thereafter. The results of such assessments and reviews will be reported to the Board. 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 suppliers, contractors and consultants proposed to appointed by the Group in relation to contracts above specified levels. All such suppliers, contractors and consultants will be required to have anti-bribery policies of their own which are at least as rigorous as those of the Group.

This policy will be reviewed by the Board at least annually. When considered necessary, appropriate changes to the policy will be implemented.