



Anti-Fraud Policy Statement



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Kao Data Head Office Location

- 80 Middlesex Street, London, E1 7EZ

Kao Data Campus Locations

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1 Purpose

The purpose of the Anti-Fraud Policy is to provide guidelines to reduce the potential risks involved with all potential aspects of Fraud, Theft, Misuse of Equipment or Abuse of Position.

2 Statement

The Anti-Fraud Policy sets out the intent and associated procedures for Kao Data against preventing fraud and/or other forms of dishonesty and also in relation to our Prevention of Criminal Facilitation of Tax Evasion Policy, which complies with the Criminal Finances Act of 2017.

It applies to all Kao Data staff, and contractors. Anyone directly associated with Kao Data who commits fraud, theft or any other form of dishonesty, or who becomes aware of it and does not report it, will be subject to appropriate disciplinary action.

Kao Data will continually strive to ensure that all its financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountably. Kao Data will also ensure that all decisions are taken objectively and free of personal interest and/or conflict of interest. We will NOT condone any behaviour that falls short of these set out and established principles.

All members of Kao Data, whether they are staff or contractor has a responsibility for adhering to these principles laid out here and putting them into practice. There is also a responsibility on everyone for reaching out and reporting any breaches that they may discover.

The Policy is communicated to all person(s) working for or on behalf of Kao Data (as part of induction training), is available to all employees via the IMS and is displayed in each office location to continually remind employees of the Company's commitment.

The Policy is also available upon request to all interested parties such as clients, investors, and suppliers.

The Policy is reviewed to ensure its ongoing suitability by the senior management team who recommend amendments and updates to the policy as part of the continual service improvement process, with an annual review of this policy undertaken annually as a minimum.

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