



Anti-Bribery Statement

INTO University Partnerships Limited ("INTO") is committed to maintaining the highest standards of ethics and integrity in the conduct of its business.

As a business and as colleagues, we do not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings. This applies to all our global operations and to the business activities of our partners, agents and service providers.

We are committed to the following principles:

- We will carry out business fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality, incentive trips or other advantage to any employee, or family or friend of a customer, a prospective customer, a public body, or any third party with the intention of inducing the employee/family/friend/customer/public body or third party to do something improper in relation to their work or the exercise of their discretion.
- We will not give or offer any money, gift, hospitality, incentive trip or other advantage to any public official or third party connected to a public official with the intention of influencing the public official to our business advantage.
- Our business partners, agents and service providers must not bribe in connection with our business.
- Our employees must not accept money, gifts, hospitality and/or other advantages from any suppliers, service providers or business partners which are intended to influence a business decision or transaction in some improper way.
- No employee or associated person will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes or doing anything else that is unethical or improper; nor will they suffer such adverse consequence by reporting such suspected conduct.
- We will avoid doing business with others who do not commit to doing business without bribery.

We are committed to an ongoing programme to counter the risk of us being involved in bribery and we will monitor compliance with our Anti-Bribery Policy and Procedures.

John Sykes
Chief Executive Officer

Date: March 2024