

Anti-Fraud Statement

**DIFFICULT.
DONE WELL.**

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Fraud is the intentional act of deception or dishonesty carried out to secure an unfair or unlawful gain, and/or to cause loss to another party. It includes false representation, failure to disclose information, and abuse of position. Fraud may be committed by employees, agents, or third parties and can occur internally or externally to the organisation and potentially resulting in financial losses, reputational damage and regulatory sanctions.

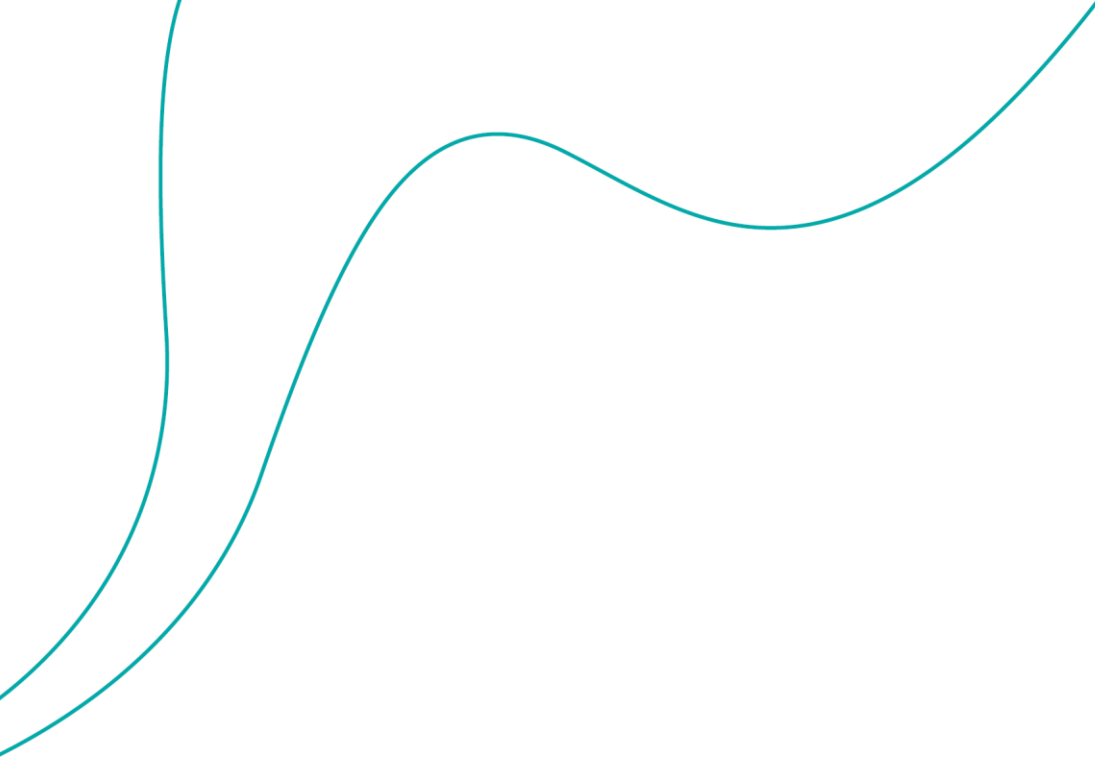
As SRG, we uphold the highest standards of integrity, transparency, and ethical conduct. We adopt a **zero-tolerance approach to fraud and other financial crimes - including money laundering, terrorist financing, sanctions breaches, bribery and corruption, and tax evasion**. We are committed to applying the highest standards of ethical conduct and behaviour, we continuously monitor and revise our internal controls to prevent fraud, and other financial crimes. As well as staff, we also expect our suppliers and contractors to adhere to the same ethical standards and applicable regulations. We strongly believe in the rule of law, and we are committed to complying with all laws, regulations and rules relevant to our business, and take our corporate and social responsibilities very seriously.

This statement reflects our obligations under:

- The Economic Crime and Corporate Transparency Act 2023 (ECCTA), on corporate offence for failure to prevent fraud
- Fraud Act 2006
- Proceeds of Crime Act 2002
- The Financial Conduct Authority rules and guidance
- Applicable international anti-fraud and financial crime regulations
- Common law and industry best practices

Our internal Financial Crime framework encompasses various levers including internal policies and procedures, learning and communication, assurance activities, risk assessments and reporting. SRG's Anti-Fraud and Financial Crime prevention efforts are steered by the Risk and Compliance function reporting to the Group Head of Regulatory, Risk and Compliance and is overseen by the Risk, Compliance and Audit Committee, the Group Executive Committee and the Board of Management.

We are committed to continuous improvement and transparency in our approach to fraud risk management and will continue to monitor, review and update our compliance approach as our businesses, regulations and inherent or perceived supplier risks change over time. We encourage all our stakeholders to report any concerns to us and reiterate that SRG does not tolerate retaliation in any form against individuals who raise concerns.



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