

## Fraud Policy

### Purpose

The purpose of this policy is to provide high level guidance for the prevention, detection and response to fraud incidents within or involving the Accordant Group Limited ('Accordant' / the Company) and its subsidiaries.

### Scope

Accordant does not tolerate fraudulent behaviour and has a ZERO TOLERANCE policy with respect to behaviour or incidents involving fraud. Zero Tolerance means:

- All instances of suspected fraud will be investigated thoroughly with appropriate action taken;
- All activities which are confirmed as fraudulent after due investigation will be treated as serious misconduct, may be subject to disciplinary proceedings and may be referred to an appropriate enforcement agency where statutes may have been breached, or loss suffered, and;
- Accordant may take all appropriate measures to recover any loss or expenditure attributable to fraudulent behaviour. This includes, but is not limited to, recovery of intellectual property, physical assets, money, third party expenses incurred and investigation costs.

This Policy applies to all employees, contractors, temporary and permanent employees and any other representatives of the Accordant. Any person who is aware of potential fraudulent activity must report the information in the manner provided for in this Policy.

### Objectives

Accordant promotes ethical and lawful behaviour and deems fraudulent, dishonest or unethical behaviour unacceptable. The Board of Directors encourages management and staff to report suspicious activity or actions in the knowledge that all such reported activities will be investigated impartially and thoroughly.

### Definitions

The term 'Fraud' refers to the deliberate practice of deception in order to receive unfair, unjustified or unlawful gain. While there is no criminal offence of fraud, there are a number of offences that could come within the definition of fraud. For the purposes of the Policy this includes all forms of dishonesty. Within this definition, examples of fraud and dishonesty may include, but are not limited to:

- Knowingly providing false, incomplete or misleading information for unfair, unjustified or unlawful gain;
- Unauthorised possession, use or misappropriation of funds or assets;
- Deliberate mishandling of or misreporting money or financial transactions;

- Unauthorised access and misuse of Accordant systems and information for unfair, unjustified or unlawful gain;
- Misuse of or obtaining insider knowledge of organisational or judicial activities without implied or expressed consent;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, or equipment for unfair, unjustified or unlawful gain;
- Deliberate misuse of Accordant resources (including work time, internet, cell phones, photocopiers, fax machines, computers, vehicles, mail services, addresses and phone numbers) for unfair, unjustified or unlawful gain;
- Forgery or alteration of any financial instrument;
- Forgery or alteration of any document or computer file or record;
- Where any person who has a business involvement with Accordant acts dishonestly or unfairly, or breaches trust.

### **Reporting a suspected fraud act**

Any person who suspects that a fraudulent act is occurring or has occurred, must report this immediately. All information about suspected fraud or corruption is to be treated confidentially. Suspected incidents of fraud or corruption must be reported by:

- Email or telephone call to their General Manager; or
- Email or telephone call to a member of the Senior Leadership Team (SLT) member; or
- Email or telephone call to the Accordant CEO; or
- Email or telephone call to the Chairperson of the Audit and Risk Committee; or
- Email or telephone call to the Chairperson of the Board of Directors.

All such reports must be passed to the Chairperson of the Audit and Risk Committee, who, with the authority of the Chairperson of the Board of Directors, will conduct an investigation. This investigative and reporting responsibility may be delegated to a General Manager or member of the Senior Leadership Team.

### **Fraud Investigation**

Where reasonable suspicion that fraud against Accordant or any of its subsidiaries has taken place, the Company is entitled to investigate the matter thoroughly using recognised and legitimate investigative techniques. All investigations will be carried out objectively and confidentially, and independently of the management for the area in which the alleged fraud has occurred or is suspected. There may be circumstances in which the investigation would be reported to and conducted by the Police, or other authorities. In certain cases, third-party investigators may be employed in order to gather sufficient evidence to hand the case over to the proper authorities. Responsibility for the management of third parties rests with the Chairperson of the Audit and Risk committee. At the conclusion of the investigation a report will be submitted to the Board of Directors. Lessons learnt will be shared across the group as soon as possible after an investigation is concluded.

## **Responsibilities**

Members of the Accordant Group Senior Leadership team are responsible for:

- Ensuring compliance with this policy throughout their operations. In particular, business units must ensure that any third parties employed by them to investigate actual or suspected frauds comply with this policy and local laws and regulations.
- Considering their exposure to fraud risk and introducing preventative controls into new and existing systems and processes.
- Encouraging an open and ethical culture amongst staff and management.
- Developing pro-active methods of fraud detection, such as data mining and analysis.
- Reporting all suspected cases of fraud or theft by an employee using the methods provided for in this policy.
- Allocating sufficient and appropriate resources to implement this policy effectively.
- Implementing initiatives that enhance fraud risk management effectiveness, including procedures that enable employees to inform management of suspected fraud, theft and wrongdoing.

### All Employees

- All employees are responsible for reporting known or suspected fraud, or instances of unethical or illegal behaviour within the company.

## **Approved by the Board of Accordant Group**

Date: 27 September 2023