



## Anti-Fraud Policy



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## 1. Introduction

Launched in 2018, Kao Data develop and operate advanced data centres for high performance computing. From our hyperscale inspired campus in the heart of the UK's Innovation Corridor between London and Cambridge and our facilities in Slough and Northolt, we provide HPC, cloud, AI, and enterprise customers with a world-class home for their compute.

## 2. Purpose

Kao Data has designed this Anti-Fraud Policy to provide guidelines to reduce the potential risks involved with all potential aspects of Fraud, Theft, Misuse of Equipment or Abuse of Position.

This document sets out the policy 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.

## 3. Statement of Intent

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.

## 4. Definitions

For guidance, below are definitions for which this Policy has been created and aims to prevent, so the following applies: -

### 4.1 Fraud:

A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The deliberate changing of financial statements or other records by either; a member of staff or contractor who works for Kao Data. The criminal act is the attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.

### 4.2 Theft:

Dishonestly acquiring, using or disposing of physical or intellectual property belonging to Kao Data or to individual members of the organisation.

### 4.3 Misuse of Equipment:

Deliberately misusing materials or equipment belonging to Kao Data for financial or material benefit.

### 4.4 Abuse of Position (Trust):

Exploiting a position of trust within the organisation for financial or material benefit.

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## 5. Culture

Kao Data fosters honesty and integrity in its entire staff. Directors, staff, and contractors are expected to lead by example in adhering to policies, procedures, and practices. Equally, members of the public, service users and external organisations (such as suppliers and contractors) are expected to act with integrity and without intent to commit fraud against Kao Data.

As part of this, Kao Data will provide clear routes by which concerns may be raised by anyone. Details of this can be found in the Kao Data Staff Handbook, under the Whistle Blowing Policy.

Senior Management are expected to deal promptly, firmly, and fairly with suspicions and allegations of fraud or corrupt practice.

## 6. Minimising Fraud Risk (Responsibilities)

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

### 6.1 Board Members

- The Board Members are responsible for establishing and maintaining a sound system of internal control that supports the achievement of Kao Data's policies, aims and objectives.
- The system of internal control is designed to respond to and manage the whole range of risks which Kao Data faces.
- The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

### 6.2 The Chief Executive Officer (CEO)

Has Overall responsibility for managing the risk of fraud has been delegated to the CEO. The day-to-day responsibility has been delegated to the CFO to act on behalf of the CEO.

Their responsibilities include:

- Undertaking a regular review of the fraud risks associated with each of the key organisational objectives.
- Establishing an effective anti-fraud response plan, in proportion to the level of fraud risk identified.
- The design of an effective control environment to prevent fraud.
- Establishing appropriate mechanisms for:
  - reporting fraud risk issues
  - reporting significant incidents of fraud or attempted fraud to the Board of Directors.
- Liaising with the Kao Data's appointed Auditors.
- Making sure that all staff are aware of the Kao Data's Anti-Fraud Policy and associated procedures and know what their responsibilities are in relation to combating fraud.
- Ensuring that appropriate anti-fraud training is made available to Senior managers, staff and contractors as required.
- Ensuring that appropriate action is taken to minimise the risk of previous frauds occurring in future.

### 6.3 Senior Management Team

The Senior Management Team is responsible for:

- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively.
- Preventing and detecting fraud as far as possible.
- Assessing the types of risk involved in the operations for which they are responsible.
- Reviewing the control systems for which they are responsible regularly.
- Ensuring that controls are being complied with and their systems continue to operate effectively.
- Implementing new controls to reduce the risk of similar fraud occurring where frauds have taken place.

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## 6.4 Staff

Every member of staff is responsible for:

- Acting with propriety in the use of Kao Data's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager when they believe the opportunity for fraud exists e.g., because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events to either their Line Manager or Chief Executive Officer (CEO).
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

## 6.5 Contractors

Every contractor is responsible for:

- Acting with propriety in the use of the Kao Data's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.
- Conducting themselves with selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- Being alert to the possibility that unusual events or transactions could be indicators of fraud.
- Alerting their manager when they believe the opportunity for fraud exists e.g., because of poor procedures or lack of effective oversight.
- Reporting details immediately if they suspect that a fraud has been committed or see any suspicious acts or events.
- Cooperating fully with whoever is conducting internal checks or reviews or fraud investigations.

## 7. Training


All staff have a responsibility to be familiar with Kao Data's Anti-Fraud Policy and Procedure which is available on the IMS system. Staff will be made aware if any such policies or procedures are updated and they are under a duty to ensure that they are familiar with the updated documents. On-line training refresher modules may be distributed from time to time, and you are expected to comply and complete these training modules. Failure to adhere to this policy and any associated procedures may result in disciplinary action.

## 8. Review

A review of this policy and its continued applicability will be carried out on an Annual Basis.

## 9. Sign Off

**Signed**

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**Lee Myall**  
 Chief Executive Officer, Kao Data  
 Published: August 2023

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