

## ANTI-BRIBERY AND TAX EVASION

With the enactment of the UK Bribery Act 2010, GCP Student Living plc (“GCP Student” or the “Company”) has developed appropriate anti-bribery policies and procedures. GCP Student has a zero-tolerance policy towards bribery and is committed to carrying out its business fairly, honestly and openly. The anti-bribery policies and procedures apply to all its employees and to those who represent the Company (including its business partners). GCP Student expects those providing services for it, or on its behalf, to undertake their business without bribery.

The Criminal Finances Act (Commencement No. 1) Regulations 2017 (SI 2017/739) brought Part 3 of the Criminal Finances Act 2017, the corporate offences of failure to prevent facilitation of tax evasion, into force on 30 September 2017. The Company does not tolerate tax evasion in any of its forms in its business. GCP Student complies with the relevant UK law and regulation in relation to the prevention of facilitation of tax evasion and supports efforts to eliminate the facilitation of tax evasion worldwide, and works to make sure its business partners share this commitment.

GCP Student assesses the nature and extent of its exposure to the risk of those who act for or on its behalf engaging in activity during the course of business to criminally facilitate bribery or tax evasion. The Company applies due diligence procedures, taking an appropriate and risk based approach in relation to those who perform, or will perform services on its behalf, in order to mitigate identified risks relating to bribery or the facilitation of tax evasion.