

Anti-Money Laundering Policy

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

As a business and as colleagues, we are committed to preventing money laundering.

Whilst INTO does not undertake regulated activities for the purposes of UK and EU anti-money laundering legislation, we take seriously the responsibility of ensuring our business is not used for the purposes of money laundering and are committed to best practice in this area.

INTO follows a framework in order to support law enforcement authorities' activities to detect proceeds from serious crimes and help prevent money laundering and recycling of illegally obtained money.

INTO requires all employees to adhere to this policy in order to prevent the use of our company and its services being used for the purposes of money laundering. Adherence to the policy is critical to ensure that INTO and all its group companies, regardless of geographical location, comply with our obligations in respect of preventing money laundering.

Currently, INTO and its joint venture partners do not undertake activities requiring them to comply with the Money Laundering Regulations but we will continue to actively review the situation.

We are committed to a programme to counter the risk of us being involved in transactions which have the hallmarks of money laundering, and we will monitor compliance with our Anti-Money Laundering Policy and Procedures.

John Sykes

Chief Executive Officer

Date: January 2025