

# Global Anti-Fraud Policy

## Purpose

This policy commits Knight Frank to taking pro-active, practical steps to prevent fraud. All employees and members of Knight Frank are required to report any incidents that do occur.

Any suspicion of fraud should be reported to the UK Best Practice Team in the first instance, who will assess and investigate every reported incident proportionately and appropriately. The UK Best Practice Team will be responsible for activating the Incident Response Procedure (UK) or notifying the Country/ Regional Head where required. Each country should have a fraud response plan in place that must be followed in the event fraud or attempted fraud is suspected.

## Why it matters

Fraud is one of the most common crimes in the world and is believed to affect a significant number of businesses each year. It is an ever-present threat to our resources and hence must be a concern to all. The purpose of this policy is to set out our responsibilities with regard to the prevention and detection of fraud.

Accusations of fraud harm customer trust, and as a result even allegations can damage our reputation significantly. As well as reputational damage, non-compliance with anti-fraud laws can result in fines and imprisonment.

Knight Frank are dedicated to developing an anti-fraud culture across the organization, seeking to minimize the opportunities for fraud, bribery and corruption.

This policy is one element of a wider set of policies we have in place to prevent fraud and wrongdoing, including our Global Anti-Bribery and Corruption, Whistleblowing, and Anti-Money Laundering policies as well as any local policies (for example local gifts and hospitality policies).

## Scope

This policy applies to all employees and members of Knight Frank. It applies also to consultants, contractors and agency workers in relation to their work for, or on behalf of, Knight Frank.

Knight Frank refers to the member firms of the Knight Frank Global Network, each of which is a separate legal entity. The Knight Frank Global Network comprises Knight Frank LLP, its subsidiaries (direct or otherwise), its affiliates and any other entity or practice carrying on business under or including the name Knight Frank or in association with Knight Frank LLP internationally in over 50 territories. Failure to comply with this policy may result in disciplinary action being taken against anyone involved, or the termination of contracts with contractors and other third parties working for Knight Frank.

The Knight Frank Global Network can use the Knight Frank name and resources of the network. Member firms agree to abide by certain common policies and to maintain the standards of Knight Frank.

## Definitions

In the UK, the Fraud Act 2006 states the criminal offence of fraud can be committed:

- by false representation,
- by failing to disclose information,
- by abuse of position, and
- with the intention of making a gain or causing a loss or risk of loss to another. The gain or loss does not actually have to take place.

False representation: where an individual dishonestly makes an untrue or misleading representation, knowing it is or may be untrue or misleading.

Failing to disclose information: where an individual dishonestly fails to disclose to another person information which they are under a legal duty to disclose.

Abuse of position: where an individual who occupies a position in which they are expected to safeguard, or not act against, the financial interests of another person, and they dishonestly abuse that position.

Fraud, for the purpose of this policy, goes beyond the Act and includes theft, forgery, concealment, conspiracy and bribery. Fraud may include, but is not limited to, stealing cash or equipment, submitting false expense claims, invoicing for goods not intended for Knight Frank business, unauthorised removal of Knight Frank

property, manipulating accounts and records, dishonest contract arrangement and other financial irregularities.

## General Principles

Knight Frank is determined to prevent, deter and detect all forms of fraud committed against and within it, whether by internal or external parties. All Knight Frank employees and members have an obligation to conduct business in accordance with this policy, reporting any breaches they discover and promoting an anti-fraud culture.

Knight Frank will not accept any level of fraud and are committed to promoting honesty and integrity in all of our activities. We take the risk of fraud extremely seriously and will not tolerate any such wrongdoing. Any breach of the policy and related procedures may result in disciplinary action.

## Responsibilities

Everyone is responsible for:

- Acting with propriety in the use of company resources and in the handling and use of client funds.
- Raising any concerns about weaknesses in internal controls in relation to Fraud to their Line Manager.
- Reporting details immediately in line with the Incident Response Plan or local Fraud Response Plan if they suspect that a fraud has been committed, or see any suspicious acts or events.

Managers should be responsible for:

- Identifying the risks to which systems and procedures are exposed, including the creation and assessment of a Fraud Risk Assessment where applicable.
- Ensuring that controls are being complied with.
- Notifying the end client of a fraud impacting the client via the Client Relationship Manager/ Lead Partner in discussion with the UK Best Practice Team.

Knight Frank senior leadership should be responsible for:

- Developing and maintaining effective controls to prevent and detect fraud.
- Carrying out vigorous and prompt investigations if fraud occurs.
- Taking appropriate legal and/or disciplinary action against perpetrators of fraud.

## Whistleblowing

Knight Frank maintains a Global Whistleblowing Policy, incorporating an independent hotline, to ensure that anyone can report concerns, confidentially where possible, and to ensure that such concerns are investigated and remediated appropriately.

Anyone who has concerns relating to a potential breach of this policy must follow our Global Whistleblowing policy and report the matter immediately. There will be no repercussions for anyone taking these reporting steps, providing the suspicions or concerns are for genuine and not malicious reasons.

Management has a responsibility to investigate any reports of wrong-doing. Inaction in investigating reported or known issues will not be tolerated and will be subject to disciplinary action.

## Policy implementation

This policy is to be adhered to by all entities part of the Knight Frank Global Network. This policy will be made available to the Knight Frank Global Network via the Knight Frank website and other applicable platforms.

## Monitoring and Review

This policy will be reviewed in line with all other global policies at least annually. If there is a business or legislative reason for it to be reviewed more frequently, then this will be conducted by the UK Best Practice Team.

## Knight Frank Global Anti-Fraud Policy

Prepared: April 2026  
Approved by: William Beardmore-Gray  
Position: Senior Partner and Chairman  
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