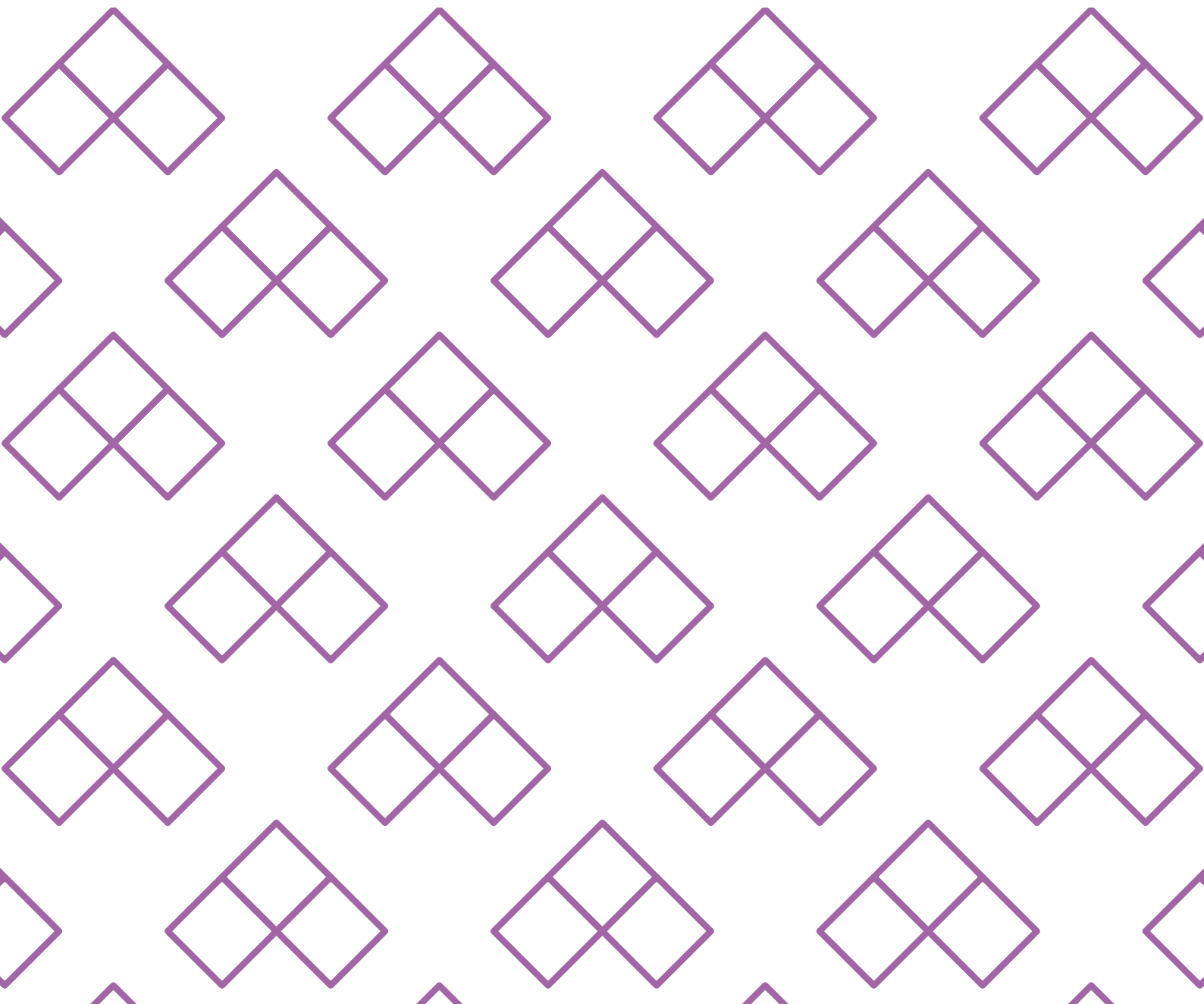


LLA Fraud Policy

EFFECTIVE: 1 SEPTEMBER 2025



What is the purpose of this policy?

London Luton Airport is committed to fostering a culture of zero-tolerance towards fraud and maintaining the highest standards of honesty and integrity. This principle of zero tolerance towards fraud is absolute and prevails over any type of financial or other benefit that LLA, its shareholders or customers may obtain.

The purpose of this policy is to set out LLA's approach to preventing, detecting, and responding to fraud, with proactive measures in place to meet the requirements of the Economic Crime and Corporate Transparency Act 2023 (ECCTA). The Government's ECCTA [Guidance to organisations on the offence of failure to prevent fraud](#) provides additional guidance for the application and interpretation of this Policy.

This Policy also complements LLA's Code of Conduct, Anti-bribery, Corruption and Conflicts of Interest Policy, Regulatory Compliance Policy, Corporate Tax Policy and Prevention of Facilitation of Tax Evasion Policy.

LLA has also adopted Aena's Anti-Bribery Policy. This policy implements and is consistent with this Aena policy, which can be found on the LLA Hub here [Aena Policies](#)

Who does this policy apply to?

This policy applies at all times to all directors, executive members, employees, workers, contractors and consultants (each a "Member of Staff", "you" or "your" and collectively "Staff") of London Luton Airport Operations Limited ("LLAO"), London Luton Airport Group Limited ("LLAG"), London Luton Airport Holdings I Limited ("LLAH1"), London Luton Airport Holdings II Limited ("LLAH2") or London Luton Airport Holdings III Limited ("LLAH3") (together being "LLA" "we", "our" or "us").

It also applies to LLA's agents and any external person (whether an individual or a corporate) who acts on our behalf or provides services for or on behalf of LLA ("**Associated Persons**").

It applies to all activities undertaken in connection with LLA, whether within the UK or abroad.

While all Staff must comply with this policy, it does not form part of any Member of Staff's contract of employment or contract for services, and as such LLA may amend it any time.

This policy is subject to regular review by LLA and may be withdrawn or updated without prior notice at any time. It is the responsibility of all Staff to regularly review this policy and at the very least whenever it is updated.

What are the requirements of this policy?

The commitment or facilitation or covering up of fraud by LLA, Staff or Associated Persons is strictly prohibited.

Definition of Fraud

Fraud is a financial crime which has various forms. It includes any unlawful behaviour or action carried out through deception or deliberate concealment with the aim of obtaining a benefit or avoiding losses, usually to the detriment of another person, company or institution.

The relevant fraud offences covered by ECCTA include:

- fraud offences under section 1 of the Fraud Act 2006 including:
 - fraud by false representation (section 2 Fraud Act 2006);
 - fraud by failing to disclose information (section 3 Fraud Act 2006); and

- fraud by abuse of position (section 4 Fraud Act 2006);
- participation in a fraudulent business (section 9 Fraud Act 2006);
- obtaining services dishonestly (section 11 Fraud Act 2006);
- cheating the public revenue (common law);
- false accounting (section 17 Theft Act 1968);
- false statements by company directors (section 19 Theft Act 1968); and
- fraudulent trading (section 993 Companies Act 2006).

If you are not sure whether an activity or behaviour constitutes fraud, please contact the Legal Team for advice.

Books and records

LLA will maintain books, records and accounts that contain all necessary details and accurately reflect the operations and status of assets of the organisation.

The preparation of financial information requires following accounting rules and principles with accuracy and completeness and having adequate internal processes and controls to ensure that accounting and financial reporting are complete, reliable and comply with all applicable legal requirements.

Accurate, appropriate and reasonably detailed documentation must be maintained to cover all transactions and retained in line with LLA's document retention policies and the law.

The deliberate misuse or misrepresentation, omission or secrecy of the accounts, funds or assets of LLA with intent to defraud or violate the provisions of this Policy or applicable law is strictly prohibited.

The following, non-exhaustive list of conduct is prohibited:

- Establishing unregistered accounts;
- Conducting off-book or misrecorded transactions;
- Recording non-existent expenditure;
- Entering expenses in accounting records with an incorrect description of their purpose;
- Using false documents; and
- Deliberately destroying accounting documents before the deadline stipulated by law.

Responsibility

LLA Board of Directors	Overall accountability for the enforcement of this Policy and oversight of its compliance and effectiveness
Audit and Risk Committee (ARC)	Highest form of assurance over the reporting and the internal controls set by this Policy.
Executive and Senior Management team	Promotion of anti-fraud culture and integrity.

Risk and Compliance function	Maintenance of this Policy including oversight of fraud risk assessments, reporting and training compliance.
All LLA Staff and Associated Persons	Compliance with this Policy and reporting of suspected fraud.

Risk Assessment

LLA is committed to minimising the risk of fraud committed by Staff and Associated Persons by regularly assessing the nature and extent of such risks. Each Head of Department is responsible for ensuring their department undertakes adequate fraud risk assessments and that such risks are recorded and maintained on LLA's Enterprise Risk Management System (ERMS))

In undertaking the risk assessments, Staff must consider the components of the 'fraud triangle' as suggested within the Government's ECCTA guidance when conducting fraud risk assessments. This includes consideration of an associated person's opportunity, motive, and rationalisation behind potential fraudulent behaviour.

LLA may use a wide variety of information available when conducting risk assessments. This includes, but is not limited to:

- data analytics;
- previous audits;
- sector-specific information, best practice advice, or toolkits from relevant professional or trade bodies or regulators;
- professional advice;
- regulator enforcement actions; and
- any information regarding pending investigations and prosecutions, including any future convictions and deferred prosecution agreements.

LLA's risk assessment procedures are kept under regular review, as part of the overall risk and compliance internal assessment system, and at least annually or whenever significant changes occur in operations, organisational structure or regulations, to ensure that reasonable procedures are in place.

Fraud Prevention Controls and Procedures

LLA is committed to developing fraud prevention procedures that are proportionate to the relevant risk and its potential impact.

LLA is also committed to reducing the opportunities for fraud through the following measures:

- undertaking rigorous pre-employment and vetting checks for all incoming employees and ongoing vetting checks for high-risk roles;
- providing regular anti-fraud training to all employees and monitoring completion of such training;

- assessing emerging risks systematically and consistently across all company departments;
- using best practice regarding all financial reporting;
- ensuring that all fraud concerns raised by internal and external audits are acted upon;
- utilising procedures to address any actual and potential conflicts of interest; and
- limiting access to sensitive personal data.
- Promoting awareness among Staff and reporting by them of any alleged suspected fraud case by the appropriate channels (ie, Whistleblowing channel)

LLA is committed to reducing the motive and rationalisation behind fraudulent behaviour through:

- encouraging proactive challenge of such behaviour as part of our training programmes; and
- effectively communicating the negative impacts of fraud on colleagues in our training programmes..

To ensure the effectiveness of this Policy, controls will be regularly tested and may involve internal or external testing. For example, AENA monitor internal controls over all aspects of financial reporting to mitigate fraud risk.

Due Diligence

Due diligence is designed to identify fraud risks associated with persons or entities who may be considered Associated Persons. LLA is committed to ensuring that appropriate due diligence on Associated Persons is completed, including:

- the use of appropriate third-party risk management tools, screening tools, internet searches, trading history checks, and professional or regulated status checks where relevant;
- review of service providers' contracts to ensure inclusion of appropriate compliance obligations;
- review of agents' contracts to ensure inclusion of appropriate compliance obligations; and
- monitoring of Staff well-being to identify potential risks of fraudulent behaviour.

In the event of a merger or acquisition of any business or entity, the Legal Team shall ensure appropriate due diligence is completed on the relevant business/entity in relation to fraud.

Any due diligence procedures adopted will be proportionate to any risk identified and will be kept under review as necessary.

Communication and Training

LLA is committed to ensuring that its anti-fraud policies are clearly articulated and endorsed at all levels. This Policy will be communicated to all Staff and Associated Persons.

Training provided to employees will be proportionate to the risk faced, such as specific training to those in high-risk positions. Training shall cover the nature of any offence and well as procedures to address it.

Anti-fraud training will be provided through mandatory online training modules, as well as bespoke training to address specific fraud risks within departments as required.

Training may be organised and delivered by internal members of Staff or by a third party.

All Staff must complete fraud awareness training on induction as well as any other refresher or bespoke training required by LLA.

Raising concerns

Staff must report any suspected fraud without delay. Reports must be made to LLA's General Counsel unless a person does not feel able to do so, in which case the concern must be reported through LLA's Whistleblowing channel, as set out in the LLA Whistleblowing Policy.

No retaliation will be tolerated against those who have reported in good faith.

Monitoring and Investigation

LLA will adopt a range of measures to detect fraud and attempts at fraud. Examples of potential measures include:

- analysis of how financial discrepancies are flagged and to whom;
- implementing processes for detecting unauthorised access to data;
- use of data analytics tools;
- encouraging members of staff to speak up about fraud-related concerns; and
- upholding all whistleblowing procedures.

Once a suspected fraud has been reported, LLA will investigate the matter. All investigations shall be impartial, clear about their internal client and purpose, appropriately resourced, empowered and scoped (including through legal advice) and legally compliant.

All investigations will be logged and retained in accordance with LLA's recordkeeping policy to support regulatory accountability under ECCTA.

Policy Review

This policy will be reviewed at least annually and updated as necessary to ensure it remains effective and compliant with ECCTA.

What actions may LLA take if the requirements of this policy are not met?

Breach of this policy by a Member of Staff may, where appropriate, result in an investigation and possible disciplinary action in accordance with LLA's Disciplinary Procedure (which can be found on the LLA Hub). Where disciplinary action is appropriate, it may be taken whether the breach is committed during or outside that Member of Staff's normal hours of work and whether in the office, from a remote working location or any other location which that Member of Staff attends in the course of a social or work event arranged by LLA or a stakeholder of LLA.

Each Member of Staff is required to co-operate with any investigation into a suspected breach of this policy, and report any breach of this policy (this includes their own breach or that of another Member of Staff) immediately to their head of department in the first instance.

Approval

This policy has been approved by the board of directors of LLA and is effective as of 1 September 2025.

