

The Unite Group plc Anti-Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes our anti-slavery and human trafficking statement for the financial year ended 31 December 2020. Unite Students is committed to zero tolerance of modern slavery and we set out below the steps we are taking to prevent modern slavery in our business and our supply chain.

Who we are

The Unite Group plc is a FTSE 250 business registered in England and Wales. We are an owner and operator of purpose built student accommodation across the UK, with our head office in Bristol. We operate through a large group of companies and this statement applies to all members of that group (including The Unite Group plc and Unite Integrated Solutions plc) who are required to make a statement pursuant to the Act. To read more, please read [Unite - Who we are](#).

We are fundamentally opposed to slavery and committed to understanding the risk of it and ensuring it does not occur anywhere within our business or supply chain. We see this as fundamental to being a responsible and sustainable business and having trusted, open and valued relationships with our suppliers, people who invest in us, Universities who partner with us and students who choose to make their home with us while at University. To read more, see [Unite Students - Responsible business](#).

In the financial year ended 31 December 2020 we have taken the steps set out below to ensure that slavery and human trafficking is not taking part in any of our supply chain or in any part of the group of companies.

Our policies

Setting clear expectations of our people and our supply chain is critically important to ensuring that slavery and human trafficking is not taking part in our business or supply chain. The following Codes and Policies help set out these expectations:

Code of Conduct on Employment Practices – among other things, sets out our commitment to ensure all employment with us is on a voluntary basis.

Code of Ethics – sets out our expectation that all employees conduct business in accordance with the highest standards of business and personal ethics, which includes always acting with honesty and integrity and without discrimination.

Our Sustainable Procurement Policy – requires suppliers to have policies in place regarding the minimum legal age of employment and compliance with local laws regarding working hours and overtime, and that they make efforts to reduce excessive working hours. This policy also reflects our own Living Wage policy, and requires our suppliers to provide employees with at least the minimum wage and encourage our suppliers to also adopt and adhere to the Living Wage principles.

Our Whistleblowing Policy – encourages our people to raise concerns in confidence and provides protection for qualifying disclosures.

Our people

The Unite Group has 1900 employees (as at 31 December 2020). These employees operate our 173 properties across the UK, providing homes to over 74,000 students.

Our Code of Conduct on Employment Practices sets out our commitment to ensure all employment with us is on a voluntary basis. Our Unite Students Code of Ethics sets out our expectation that all employees conduct business in accordance with the highest standards of business and personal ethics, which includes always acting with honesty and integrity and without discrimination. One way we reinforce this is through our company values, which includes a commitment to always **“doing what’s right”**. We provide guidance and training to support employee understanding of our values and actively encourage employees to raise any concerns, including through a confidential whistleblowing channel. Our Whistleblowing Policy encourages employees to raise concerns in confidence and provides protection for qualifying disclosures.

Unite Students became the first accredited Living Wage private accommodation operator in December 2015, after The Living Wage Foundation reviewed our working practices and commitments. This accreditation ensures everyone working at Unite Students, regardless of

whether they are permanent employees or third-party contractors, receive a minimum hourly wage of £9.50 outside London and £10.85 in London. This is significantly higher than the Government's national living wage of £7.83. For more information, see [Unite accredited as a Living Wage Employer 2015](#).

Our commitment to being a sustainable and responsible business

Our commitment to “doing what’s right” extends more broadly to being a sustainable and responsible business. Over the years we have worked hard to reduce our environmental impact, support the wellbeing of our student customers and promote access to higher education through the Unite Foundation. Even before the Covid-19 pandemic it was clear to us that we needed to do more on social and environmental issues. The Black Lives Matter movement rightly brought racism into sharper focus and the mass climate protests raised awareness of environmental concerns.

In 2020, following extensive engagement with our stakeholders, we developed five overarching sustainability commitments, defining our new levels of ambition and showing how we will work to make a real difference:

1. **Targeting net-zero carbon operations and construction from 2030** – we will reduce carbon emissions from new and existing buildings in line with climate science, ahead of the timescale set out in the Paris Climate Agreement to avoid the worst impacts of climate change. We will do this following the net zero carbon hierarchy, with a strong focus on reducing energy consumption through improving our buildings, while also strengthening the way we buy renewable energy and investing in certified carbon offsets for any residual emissions. More details will be included in our Net Zero Carbon Pathway which will be published later in 2021.
2. **Creating resilient, resource-efficient assets and operations** – we will reduce the environmental impact of our new and existing buildings by improving energy and water efficiency, and also help our students to adopt lasting sustainable living habits.
3. **Enhancing the health and wellbeing of our employees and students** – driving real improvements in physical and mental health and wellbeing based on an understanding of their needs, through improvements to our service model, physical assets and employee support.

4. **Providing opportunities for all backed by new diversity targets** – including students, employees and in the communities where we work, where all can succeed, whatever their background, gender or ethnicity.

5. **Leading the student housing sector** – we will work to raise standards across the student housing sector and deliver value to our customers and investors.

Following the launch of our new sustainability commitments and specifically enhancing the health and wellbeing of our employees and students, during 2021 we are reviewing our Code of Conduct on Employment Practices and our approach to temporary resourcing, together with a new onboarding process, to strengthen the steps we are taking to prevent modern slavery in our business and supply chain.

Our supply chain

Being a sustainable and responsible business and “doing what’s right” extends to how we work with our suppliers and managing our supply chain.

Our supply chain comprises primarily UK based suppliers or specialist contractors providing goods or services in the UK. These are mostly real estate services (such as development, construction and property refurbishment) as well as broader property management related services (such as property preventative and reactive maintenance, property lifecycle works, as well as other technical services related to utilities, health & safety etc.).

We have a Sustainable Procurement Policy which requires (among other things) suppliers to have policies in place regarding the minimum legal age of employment and compliance with local laws regarding working hours and overtime, and that they make efforts to reduce excessive working hours. Our Sustainable Procurement Policy also reflects our own Living Wage policy, and requires our suppliers to provide employees with at least the minimum wage and encourage our suppliers to also adopt and adhere to the Living Wage principles. Our Procurement and People teams work closely to achieve this.

Temporary labour for activities such as cleaning and maintenance at our properties across the UK are sourced through a central resourcing supplier. We have full visibility and control (via electronic timesheets) over the rates charged to the agencies and what the individuals receive, with all roles receiving the Living Wage as a minimum. Any engagement for more than 8 weeks is contracted as a payrolled fixed term contractor and covered by the Agency Worker Regulations where applicable.

To help ensure compliance with our Sustainable Procurement Policy, we work collaboratively with our suppliers during review meetings – trialing sustainability innovations wherever possible and sharing best practice across our supply chain. Our prospective suppliers’ compliance with

Modern Slavery legislation – as well as broader sustainability and responsibility – plays a key part of our competitive tender stage and our approved suppliers go through due diligence to ensure compliance.

Our property development, renovation and property services contractors (and their sub-contractors) are verified by CHAS (The Contractors Health and Safety Assessment Scheme). This involves comprehensive checks including verifying the health and safety working practices of these suppliers.

Modern Slavery Risk assessment

We consider our most significant risk areas in relation to slavery and human trafficking as being in our supply chain (rather than our employee base), particularly in connection with the sourcing by suppliers of construction material, certain goods and the provision of manual labour in property development and management services. Over 95% of our supply chain is with UK based suppliers (with raw materials sourced, or products manufactured, overseas); the balance of suppliers are generally specialist software companies primarily with a US presence.

As part of our ongoing initiatives to identify and mitigate risk in our supply chain, we have undertaken a procurement / supply chain risk assessment. Following this assessment, we continue to:

- improve our supplier management processes by centralising more contracts, focusing on supply chains identified as having a higher risk of slavery and trafficking;
- strengthen our procurement practices to deliver a more standardised approach to (among other things) employment practices monitoring and compliance in our supply chain;
- build long term relationships with UK based suppliers and framework contractors and make clear our expectations of business behaviour; and;
- maintain systems to encourage the reporting of concerns and the protection of whistle blowers in our supply chain.

We continue to review this risk assessment and monitor our activity as part our broader approach to ensuring we are a responsible and sustainable business.

Measuring our effectiveness

Our development and supply chain strategy is based on us working collaboratively with our supply partners and contractors. This approach creates opportunities to better prevent modern slavery and improve safety and working conditions on our sites and in our supply chain.

In our development activity, we work with a carefully selected and limited number of framework contractors to ensure a partnering approach. A third party, Faithful & Gould, help us measure the working conditions at these sites through various performance indicators including: incident reporting at site, health and safety performance (this includes health factors for workers and safe working practices) and Covid-19 compliance. Another third party, PH7 Health, runs a Wellbeing programme providing operatives with access to on-site wellbeing workshops, mental health first aid training and an Employee Assistance Program sponsored by the Group.

We closely manage the performance of our supply chain, with major project suppliers undergoing annual competitive tenders and evaluations to determine overall performance and adherence to our required standards and our supplier performance manager ensuring our minimum requirements are met for the rest of our supply chain. We will be introducing an audit regime to provide assurance that our standards are being met.

Training and engagement

We provide our employees extensive training across a wide range of topics covering working conditions, such as health & safety, security, fire safety, diversity and inclusion and wellbeing. Through 2020, this training was extended to include Covid-19 and ensuring safety in our properties and also “working from home” training for those roles that could be carried out from home.

We engage with our employees through various channels, including regular employee surveys (covering topics such as our support during Covid-19, diversity and inclusion and the development of our sustainability strategy) and “Unite Live” sessions with our CEO and key senior leaders, providing regular business updates and an opportunity for our people to ask any question directly of the leadership team.

Through one of the five pillars of our new sustainability strategy (*leading the student housing sector by raising standards*) we will continue to put robust governance and management processes in place to ensure compliance with all relevant regulations, codes and other requirements, backed up with appropriate training and engagement.

Conclusion

Having regard to the nature of our business as a UK based property business, our modern slavery risk assessment, our focus on our Unite Students' values and especially "doing what's right" and the activities described within this statement, we are confident that our approach to tackling modern slavery is appropriately targeted. Through our new sustainability strategy and in particular our focus on "leading the student housing sector by raising standards", we will continue to promote collaborative, sustainable and responsible business relationships with our supply chain partners.

This statement was approved by the Board on 20 April 2021

Richard Smith

Chief Executive

20 April 2021