

ENP-02 / Environmental Policy

Version Number:2024/2.0

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1 Introduction

1.1 Setting the scene

Unite Students is the UK's largest owner, manager and developer of purpose-built student accommodation (PBSA). We provide homes to 70,000 students in 23 leading university towns and cities. We are committed to the delivery of our Home for Success purpose and our values underpin the way we deliver, day-in, day-out. Our sustainability strategy focuses on creating real positive impact across four areas: Employees, Students and Young People, Local Communities and The Environment, and as a responsible employer we work hard to create a culture and working environment where difference is valued, and employees feel a sense of belonging.

Further details of our wider ambition and commitments on sustainability are set out in our Sustainability Policy.

We are committed to 'doing what's right', one of our core values, which extends more broadly to being a sustainable and responsible business.

1.2 Purpose

This policy sets out Unite Students' approach to managing and reducing the environmental impact of its operations.

1.3 Scope

This policy applies to all aspects of Unite Students' operations under direct operational control.

1.4 Responsibilities

This policy is managed by the Head of Sustainability and applies to all Unite's employees and contractors across all our operations including joint ventures and co-investment vehicles.

1.5 Definitions

CDP	Formerly the Carbon Disclosure Project
EMS	Environmental management system. A collection of policies and processes intended to help manage environmental impacts and drive continual improvement.
EPRA sBPR	European Public Real Estate Association Sustainability Best Practice Reporting Standards
FTSE4GOOD	A series of indices that help investors identify companies that meet environmental, social and governance (ESG) standards
GHG	Greenhouse gasses. Emissions that contribute towards climate change, including a number of gasses some of which are more potent than carbon dioxide. Usually represented simply as tonnes of carbon dioxide equivalent (CO ₂ e)
GRESB	Global Real Estate Sustainability Benchmark
SBTi	Science based targets initiative – A corporate climate action organization that helps companies and financial institutions set science-based targets to reduce greenhouse gas (GHG) emissions.
CFD & TCFD	Financial disclosure requirements under the Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022) and Task Force on Climate-Related Financial Disclosures

1.6 References

Various other documents are relevant to this policy including:

- Annual Sustainability Report
- Sustainability Policy
- Sustainable Construction Framework
- Sustainable Procurement Policy
- Net Zero Carbon Pathway
- Heating Policy

For online sustainability reporting see <https://www.unitegroup.com/sustainability>

2 Policy

2.1 Intent

This policy seeks to reduce the environmental impacts arising from Unite Students' business operations in line with our overarching sustainability strategy as set out in our Sustainability Policy. The Environmental Policy fits under our "The Environment" section of our "Creating a positive impact" framework (see figure 1).

Our overarching ambition is to "Minimise our impact on the environment and create sustainable buildings". We aim to do this by;

- Playing our part to help tackle climate change via our Net Zero carbon targets and pathway
- Targeting ambitious reductions in energy and water use
- Reducing resource consumption and supply chain impacts
- Creating sustainable buildings that support building users' wellbeing

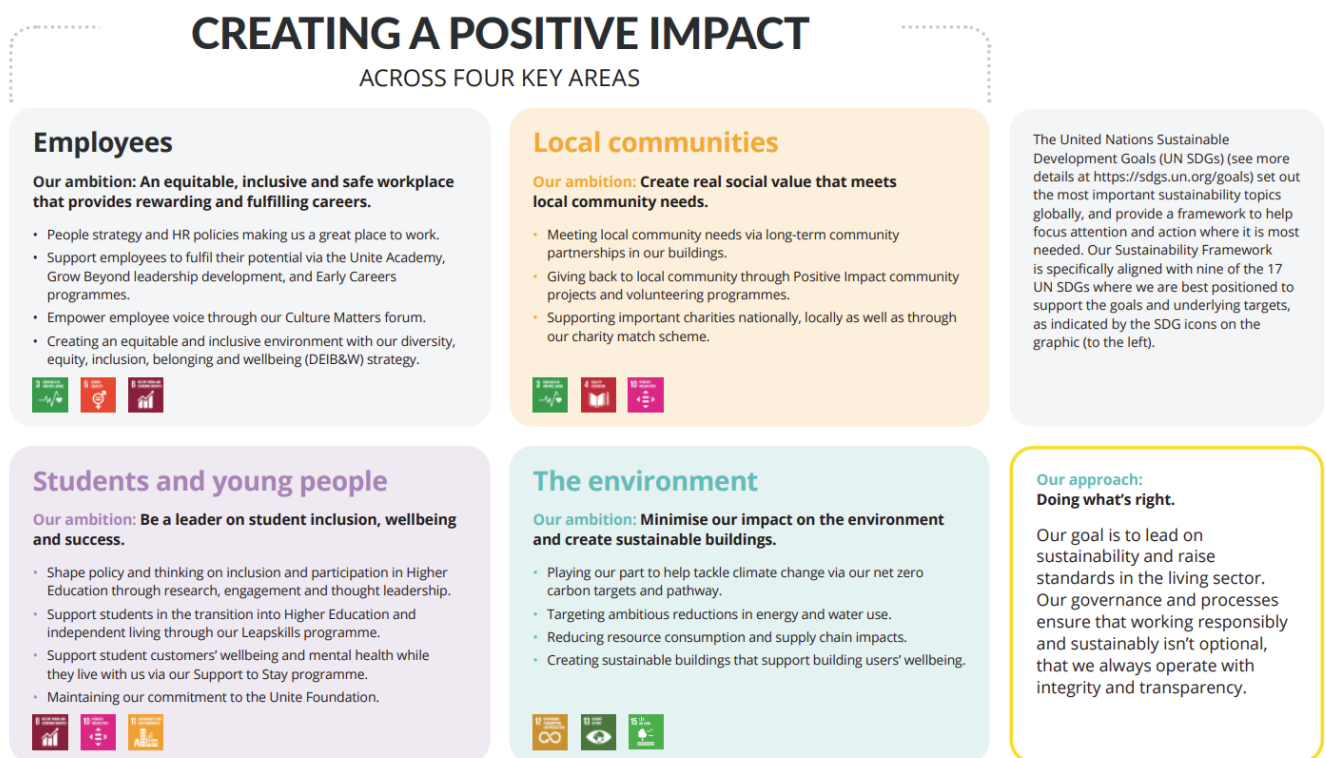


Figure 1: Our sustainability framework helps us create a positive impact across four key areas.

2.2 Principles

We recognise that our operations have an impact on the environment, and that we have a responsibility to manage and reduce this for the benefit of current and future generations via the three key areas of ambition set out above. We also have a duty to help our student residents develop lasting responsible living habits. To do this we target reductions in our three most materially significant environmental impacts: **Energy & Carbon**, **Water**, and **Resource Use & Waste**, via a range of activity across three environmental themes:

- **Effective Management:** managing our buildings in a way that optimises energy and water efficiency, reduces waste and other environmental impacts.
- **Responsible Behaviour:** educating, engaging and encouraging our residents to adopt lasting responsible living habits that help reduce energy, carbon, water and waste.
- **Sustainable Buildings:** manage our portfolio and make capital investments to our physical estate to help optimise the energy, carbon and water efficiency and create an environment that supports responsible living and working habits for residents and colleagues.

2.2 Key Outcomes

Our Environmental Strategy seeks to manage all environmental aspects of our business to ensure regulatory compliance and to reduce environmental impacts, including but not limited to:

- Reducing our contribution to climate change by targeting net zero carbon by 2030 through reductions in operational greenhouse gas emissions and embodied carbon of our new developments
- Managing and mitigating climate related and other environmental risks
- Increasing energy efficiency
- Increasing our water and waste efficiency
- Reducing our resource use and waste as far as practicable, increasing recycling, reducing litter and pollution in and around our sites
- Responsible procurement of materials, products and services we consume to reduce their impact.
- Reducing pollution and emissions to air, water and land
- Supporting and enhancing biodiversity

The following areas however have been identified during stakeholder consultation to be the most materially significant and so are the focus of our activity:

NET ZERO CARBON

We recognise that greenhouse gas (GHG) emissions contribute towards climate change, and the serious threat this poses to humanity and the planet, as well as our business. We know that reducing our GHG emissions is the most significant contribution we can make to reducing our environmental impact and are aiming to be net zero carbon for both operations and development by 2030.

We have published our Net Zero Carbon Pathway that sets out our targets including Science Based Targets Initiative (SBTi) validated 1.5°C aligned carbon targets, operational energy reduction targets, renewable energy targets, and new development embodied carbon and

operational energy targets. Further information on our plans for decarbonising our developments can be found in our Sustainable Construction Framework.

CLIMATE RISK

The effects of climate change will increasingly impact on our business, and we monitor, assess, track and report on our climate risk and opportunities at a group level in line with CFD and TCFD in our annual Report and Accounts. These risks and opportunities are also taken into account at a fund and asset level when making long term decisions on the asset portfolio and capital investment plans.

ENERGY CONSUMPTION

Energy used within our buildings constitutes our most significant source of GHG emissions, as well as being a significant business cost; we are therefore committed to reducing energy consumption wherever possible to ensure an environmentally and financially sustainable future for Unite Students. Unlike many real estate companies, all energy consumed by tenants within our buildings is our responsibility owing to our all-inclusive billing model, meaning our scope 1 and 2 GHG emissions include all building energy use. This presents a significant opportunity for continuous improvement of our operational energy efficiency.

We have a separate Heating Policy that addresses effective use of our heating system

WATER USAGE

We know that water is a valuable and finite resource, and that wasting water also wastes energy used in its treatment and delivery, contributes towards water scarcity and disruptions, and necessitates increased abstraction from aquifers, reservoirs and rivers that can be damaging to the environment. The supply of potable water is essential for all our buildings and constitutes a significant operational cost. While we do not undertake water intensive operations, we are nonetheless committed to reducing our water usage through a range of physical water efficiency measures, liaison with water supply companies, leak detection and stakeholder education. We also ensure new constructions are specified to have the lowest practicable consumption to avoid placing undue stress on local water supplies.

RESOURCE USE & WASTE

Waste arising from our business activity during the operation, management and maintenance of our buildings constitutes a significant environmental impact. We recognise that there is increasing competition for limited global resources, and we are committed to reducing the impact of resources we consume during the construction and operation of our buildings by considering the full lifecycle impact of materials and resources used. We apply circular economy principles to all aspects of our operations, aiming to procure durable and re-useable items, seeking to divert waste back up the waste hierarchy and committing our supply chain to providing products with the highest circular economy potential. Our Sustainable Procurement Policy sets out how our supply chain comply in more detail.

We are committed to ensuring waste is managed in accordance with legislation and regulation at all times, to reducing the overall quantity generated, and increasing the proportion that is recycled.

We target waste reduction for hard to manage waste streams, including but not limited to plastics, WEEE, paints, solvents, fluorescent tubes, bulky items, gas canisters. We are also

committed to helping our student residents better manage their waste and work closely with local authorities and third-party waste contractors to collect the domestic student waste from our properties. Our students are provided relevant infrastructure and information to help them manage their waste and maximise the potential to implement the Waste Hierarchy.

We provide limited services that utilise plastic packaging. We will, however, strive to limit primary, secondary, and tertiary plastic packaging and prioritise the use of recycled plastic over virgin plastic wherever possible.

AMENITY ISSUES

We are committed to minimising, managing and reducing amenity issues such as litter, noise and light pollution around our assets and offices. We met all requirements set out in local planning permission and have measures in place for operational teams to target issues.

We actively encourage our staff to support the local community and have several buildings that support local initiatives or charities. Our positive impact scheme includes key actions such as local litter picking that minimises our amenity impact.

2.4 Our Environmental Management System

To achieve our goals, we operate in line with the Plan, Do, Check, Act principles of ISO14001 – all our decisions for the environment are made on a risk-based approach by following these key actions:

Plan

- Our Sustainability Strategy, Environmental Policy, Sustainable Construction Policy Net Zero Carbon Pathway and Sustainable Procurement Policy set out how we aim to have a positive impact on the stakeholders around us.
- Identify, monitor and assess our most significant climate, environmental and social impacts and implementing procedures for monitoring and controlling them.
- Risks are managed in line with relevant external models, processes or guidance and reference to these are highlighted such as linking our climate risk to CFD and TCFD.
- Set targets and objectives to address our most significant impacts.

Do

- Focus on prioritising and delivering our intended environmental outcomes and strive for continual improvement
- Set in place systems for complying with environmental legislation and other external drivers.
- Continuously report on data and progress towards our intended outcomes.

Check

- Our management structures, roles and responsibilities for our sustainability and environmental objectives touches all levels of our organisation which creates a clear process for reporting and approval of objectives and outcomes – see governance section below
- Audits of our actions and activities are carried out on a frequency that is relevant to the work being undertaken (for example energy audits conducted within 3 months of new measure implemented) or at least annually for key areas identified.
- We conduct quarterly monitoring of our most pertinent data to ensure that any inaccuracies are identified and rectified at the earliest opportunity.
- Internal audits are conducted by our Risk and Assurance Team to highlight any issues with our policies, procedures, actions, activities or data gathering.
- By completing several external accreditations, we are opening ourselves to critique from third parties – where applicable to our business and environmentally relevant, we will aim to continually improve our scores with these accreditations.

Act

- The Sustainability Team support all audits by providing relevant information in a timely fashion and address any issues identified within the given time frame.
- Where it is identified that goals and objectives are not on track, we re-prioritise work to address these. If this is something out of our control we would provide information on what has changed – this supports our strategy to operate with integrity and transparency
- Continually review any areas identified to ensure issues do not arise again, applying this to the planning stage, as stated above.

2.5 Governance

As a key part of our business plan, our Executive Committee are ultimately accountable for sustainability performance, including environmental issues. The Unite Group plc Board have oversight of this area via the Board Sustainability Committee, chaired by one of our Non-executive Directors, which meets four times per year. This policy will be reviewed annually.

Key data points that support the formation of various policies are verified by third parties on an annual basis. This confirms our commitment to basing our plans on accurate data and supports us to achieve our goals.

2.6 Reporting

We will actively participate in various environmental and sustainability related reporting and disclosure schemes such as CDP, GRESB, TCFD and EPRA sBPR. In addition, further details, targets, activity and progress in this area can be found on our website, in our annual sustainability report, and in other reporting we publish.

Appendix A – Document Control Information

Document Management			
Document Ref / Title		Environmental Policy	
Version #	2.0	Status	Live
Classification		Public (everyone has access)	
Reason for development		Set out our approach to managing environmental impacts	
Summary of changes		Updated – minor amendments to EMS, waste, plastics and governance to reflect small changes in operations	
Applicable parties		All operations and developments including supply chain	
Author(s) (name / title)		Head of Sustainability	
Owner (name / title)		Head of Sustainability	
Function		Energy and Environment Team	
Approved by (name/ title)		Chief Executive Officer	
Date Approved		17/12/2024	
Review date		26/11/2024	
Location			
Distribution			
Consultation			
<input type="checkbox"/> Data Protection	<input type="checkbox"/> Communications	<input type="checkbox"/> NCC / ECC	<input type="checkbox"/> City Teams
<input type="checkbox"/> Sales	<input type="checkbox"/> IT Service Desk	<input type="checkbox"/> IT	<input type="checkbox"/> Legal
<input type="checkbox"/> Finance - AR	<input type="checkbox"/> Finance - Treasury	<input type="checkbox"/> InfoSec	<input type="checkbox"/> HR
<input type="checkbox"/> Finance - AP	<input type="checkbox"/> Procurement	<input type="checkbox"/> H&S	<input type="checkbox"/> Business Intelligence
<input type="checkbox"/> Estates	<input checked="" type="checkbox"/> Environment	<input type="checkbox"/> Marketing	<input type="checkbox"/> Asset Management
<input type="checkbox"/> Digital	<input type="checkbox"/> Office Support	<input type="checkbox"/> PMO	<input type="checkbox"/>
<input type="checkbox"/> Commercial Finance	<input type="checkbox"/> Acquisition / Development	<input type="checkbox"/> Student Services	<input type="checkbox"/>
Version History (copy and paste from top section to here as a record)			
Version	Date approved	Author	Summary of changes
1	22/06/2023	Head of Sustainability	Update
2	17/12/2024	Environment Manager	Update