

Our Modern Slavery Statement

for the year ended 31 December 2025

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 2025. 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.

1. Our business and supply chain

The Unite Group plc is a FTSE 250 business registered in England and Wales. We are an owner, operator and developer 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 as at 31 December 2025 (including The Unite Group plc and Unite Integrated Solutions plc) who are required to make a statement pursuant to the Act. Unite Group acquired Empiric Student Property plc in January 2026 and its modern slavery statement for the financial year ending 31 December 2025 can be found at [Modern Slavery Statement | Hello Student](#).

To learn more about Unite, please see [Who we are | Unite Group](#).

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. Our business model is underpinned by providing safe and secure accommodation for students, and a passionate and committed workforce together with sustained returns to our shareholders. To read more, see [How we operate | Unite Group](#).

We consider our most significant risk in relation to slavery and human trafficking as being in our supply chain rather than in our direct operations and our employee base. Our most salient risks exist in connection with a small number of goods sourced overseas, temporary labour and the provision of manual labour in cleaning, property development and management services.

Our people

As of 31 December 2025, the Unite Group had 2,020 employees, with 1,478 of these working across our UK-based properties and 542 providing office-based support.

Unite Students became the first accredited Real 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 £13.45 outside London and £14.80 in London. The Government's current national living wage is £12.71.

Our people are employed on permanent or fixed term contracts. Through our onboarding process, all employees receive an offer letter and contract setting out the terms and conditions of their employment. We complete necessary ID checks and request evidence of the right to work in the UK. Depending on job role, additional checks may also be carried out prior to the offer of employment.

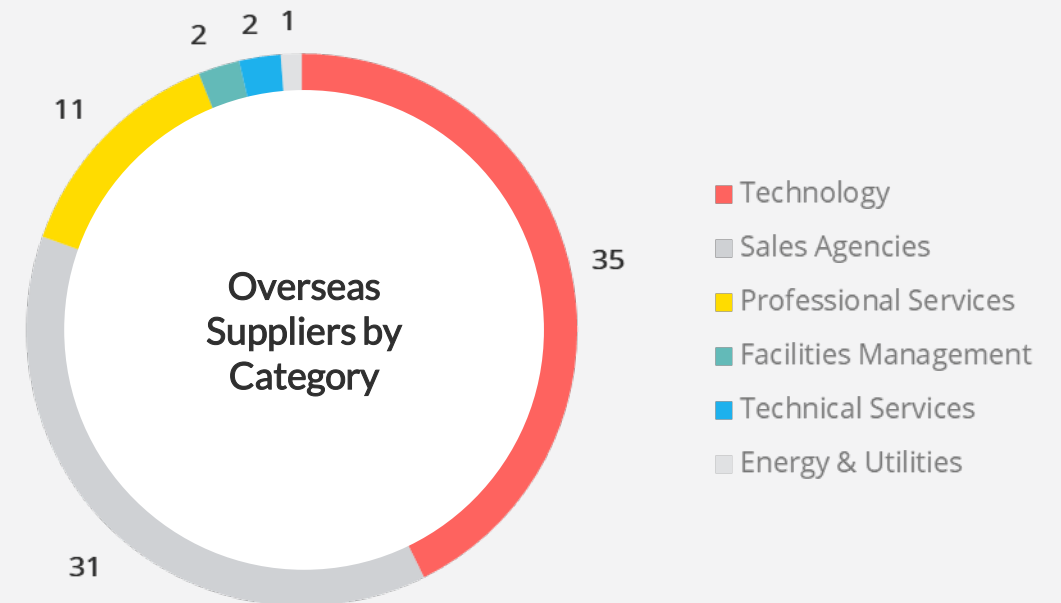
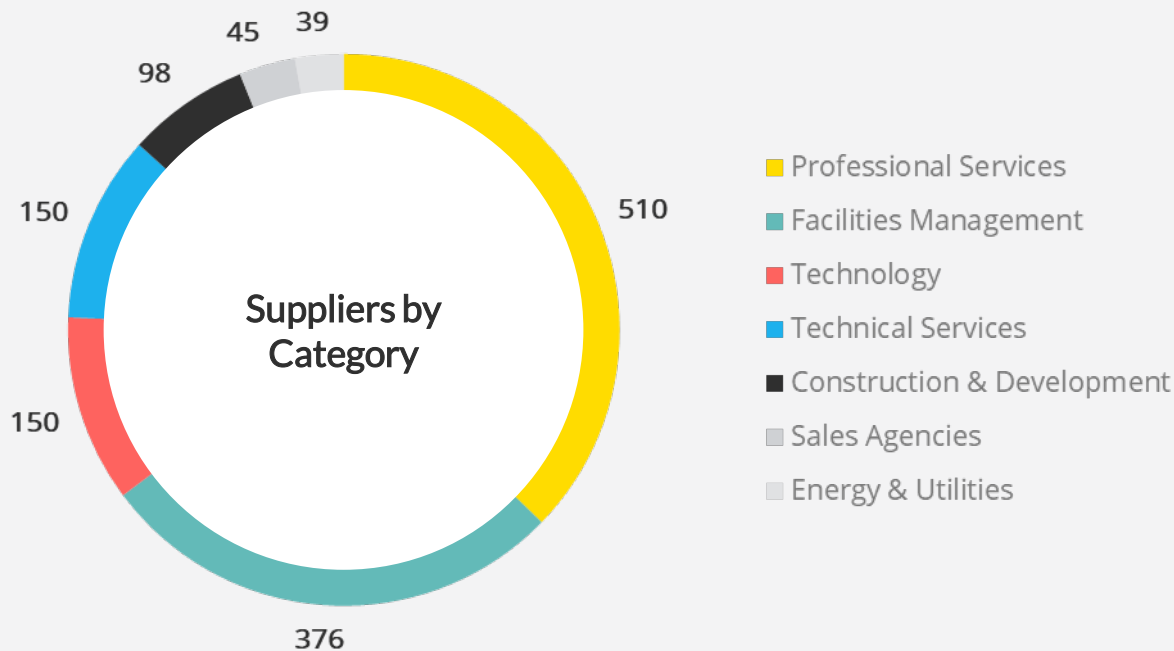
Our supply chain

We work with approximately 1350 suppliers. These are mostly real estate services (such as development, construction, and property refurbishment), professional services (architects, designers, consultancies and legal advisors) and broader property and facilities management related services (such as cleaning, preventative and reactive property maintenance).

Reflecting the nature of our business, 94% of our direct supply chain comprises UK-based suppliers or specialist contractors providing goods or services to our properties in the UK. The remaining 6% of our direct supply chain comprises products and services procured predominately from Europe (32 suppliers) and the USA (26 suppliers), with professional services and sales agencies (51%) and technology supply (42%) representing the majority.

The diagrams on this page illustrate, for the year ended 31 December 2025, the number of suppliers used by Unite for each category and the number of overseas suppliers by type of goods or services provided.

We continue to map the extent of our supply chain beyond Tier 1, which is also primarily UK based, comprising real estate and broader property management related goods and services.



2. Governance and policies

Our policies and procedures are overseen by the Chief Executive Officer and Executive Committee, who are ultimately responsible for modern slavery governance, with input from various functions across the business including Company Secretarial, Legal, People, Procurement, Risk and Sustainability. These teams work together to implement processes to monitor modern slavery risks and are responsible for responding to any identified concerns. Our policies are reviewed on an annual basis and when there are changes in relevant legislation. The implementation of these policies is overseen by relevant Business Function leaders. The Board is informed about modern slavery risks and performance and is tasked with oversight of our modern slavery policies.

Our policies in relation to Modern Slavery

Setting clear expectations of our people and our supply chain is critically important to ensuring that slavery and human trafficking is not occurring in our business or supply chain. The following Codes and Policies help set out these expectations and can be found here: [Policies & documentation | Unite Group](#). We also have a dedicated Supplier Zone page: [Our Suppliers | Unite Students](#) where we hold a specific Human Rights policy in relation to our supply chain.

Our **Employment Practices and Human Rights Policy** sets out, among other things, our commitment to ensure all employment with us is on a voluntary basis. It also outlines how we will conduct our business to uphold and respect internationally recognised human rights standards as set out in the [Universal Declaration of Human Rights \(UDHR\)](#) and the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

Our **Anti-Bribery Policy** sets out our commitment to zero tolerance of bribery and corruption through our Anti-Bribery programme.



Our policies in relation to Modern Slavery (continued)

Our **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, objectivity, integrity and without discrimination.

Our **Anti-Fraud Policy** outlines our commitment to preventing, detecting and responding to fraud. We operate a zero-tolerance approach to fraud and are committed to maintaining the highest standards of integrity and accountability.

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

Our **Supplier Code of Conduct** sets out our expectation of supplier conduct in accordance with the highest standards of business and personal ethics, including each supplier's commitment to human rights and labour standards and how they demonstrate their commitment to this. All suppliers are required to agree to the Code in order to trade with Unite Students, and the Code also requires that our suppliers uphold these standards in their dealings with their own sub-contractors and throughout their own supply chain. Key requirements include:

- Providing their employees with at least the minimum wage (adoption of the Living Wage principles, aligned with Unite Students' approach, is encouraged);
- Implementing a proactive approach to tackling labour exploitation and modern slavery;
- Ensuring no worker is below the legal age of employment and, for employees under 18 years old, adopting policies that prioritise and demonstrate their commitment to education, safety, quality working conditions and personal development. Unite Students must be informed at least 24 hours in advance of any attendance by workers under the age of 18, with a clear explanation of the working conditions and safeguarding in place for such individuals;
- Making efforts to reduce excessive working hours and promote a positive work-life balance;
- Checking all workers' rights to work in the UK and notifying them that they may be asked present identification when working or staying at one of our properties;
- Ensuring all workers are provided with contracts of employment in writing in a language they understand;
- Not using, at any time, forced, indentured or compulsory labour, or requiring monetary deposits from workers in order to start or continue their employment. Suppliers must ensure the work relationship between employer and worker is freely chosen and free from threats. This includes applying the "employer pays" principle, which ensures that the costs associated with the supplier's operation, such as uniform and accommodation expenses, are not deducted from workers' wages;
- Taking additional action to ensure their employees and those of their sub-contractors are treated with respect and dignity, enjoy the right of freedom of movement and are protected from any form of inhumane or harsh treatment. This includes the right to take time off, to leave employment of their own will after reasonable notice has been served, and the ability to access to passports and personal documentation, without restriction.

Refer to our Supplier Code for more information: [Our Suppliers | Unite Students](#)

3. Supply chain due diligence

Being a sustainable and responsible business extends to how we work with our suppliers and manage our supply chain.

Our prospective suppliers' compliance with Modern Slavery legislation – as well as broader sustainability and responsibility – is a key part of the due diligence undertaken at both the competitive tender stage (for preferred suppliers) and onboarding stage (for any supplier). We do not tolerate any form of Modern Slavery within our business and have a mandatory policy that operates over and above the UK's Modern Slavery legislation: we require all suppliers, regardless of size, to agree to our Supplier Code and complete our modern slavery vetting. This helps us to identify and address any concerns or training needed within our supply chain.

Our Procurement and People teams work closely to ensure any issues identified are resolved and that the conditions set out in the Supplier Code (outlined above) are adhered to. Any non-compliance will be subject to enquiry and, depending on the severity of the breach, we may offer suppliers the opportunity to rectify any issues and formulate a remediation plan, which may be as simple as offering training on how to protect themselves, and us, against Modern Slavery. We also have procedures in place relating to exit strategies for underperforming suppliers, to mitigate and minimise operational risks. For the most severe of concerns, this may involve suspending a supplier whilst we investigate fully and only terminating their contract with us once we understand the full impact and consequence of the risk to both us and their own workers.



4. Modern Slavery Risk Assessment

As part of our procurement strategy, we:

- assess compliance with Modern Slavery legislation – as well as broader sustainability and responsibility issues – in our competitive tender process;
- assess modern slavery risk for all new suppliers regardless of size, turnover or type of supply as part of our supplier onboarding vetting process;
- actively assess where the risk is most likely to exist within our supply chain and apply enhanced vetting for modern slavery to those higher risk categories of supply, delving further into suppliers' working and payment practices for their workers;
- offer our confidential whistleblowing reporting service to all suppliers and their employees, so that any concerns or conflicts can be raised in confidence; and
- train all our colleagues on what modern slavery signs to look for in our supply chain.

Our procurement process ensures a thorough risk assessment in the selection stages, and our Supplier Relationship Management Framework continues to assess risk during the life of a supply contract. At the start of each year, the Procurement team reviews the risk ratings of all suppliers used by the business and re-categorises them as appropriate. The level of risk and spend determines the frequency of review for each supplier, with any supplier categorised as our highest risk (or highest spend) being subject to quarterly objective performance reviews. These reviews help inform our risk assessments and ongoing monitoring for continued improvement.

We have identified two areas of supply as carrying the greatest risk of modern slavery: temporary labour (for activities such as maintenance) and cleaning at our properties. These activities involve a higher risk of forced labour, of pay rates or workers' ages being below either legislative or Unite Students' enhanced requirements, and of harsh treatment, controlled movement or debt bondage. To mitigate this risk, we:

- Source temporary labour through a third-party central resourcing supplier which provides full visibility and control (via electronic timesheets) over the rates charged to the agencies and the wages individual workers receive, ensuring that all roles receive the Living Wage as a minimum. Use of temporary labour at our properties is covered by the Agency Worker Regulations where applicable; and
- Ask for a comprehensive questionnaire to be completed by cleaning contractors. In addition, each cleaner is asked to show their ID in its original form upon arrival so we can validate who is present on our property alongside their Right to Work.

5. Measuring our effectiveness in the supply chain

Our supply chain strategy is based on 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.

We closely manage the performance of our operational supply chain and our suppliers' adherence to required standards. Our Supplier Relationship Management Framework sets out how we prioritise oversight based upon risk and spend, using tools such as performance reviews, data analysis, audits and evaluations. Our Supplier Relationship & Performance team ensures this approach is followed by not only the Procurement function but also by the wider business in the relationships they maintain with third parties.

In our development activity, we work with a carefully selected and limited number of framework contractors to ensure a partnering approach. An independent third party helps us measure the working conditions at these sites through various performance indicators including: incident reporting at site and health & safety performance (this includes health factors for workers and safe working practices). We regularly review our wellbeing offering for construction operatives and engage with external providers to improve mental health and wellbeing awareness across our development sites.

Our internal audit regime provides assurance that our standards are being met across the operational side of our business, where we assess the highest risk of modern slavery. In 2026 we are introducing a specific modern slavery audit during our peak-risk summer period on all our own premises and on supplier premises, utilising our Regional General Managers, internal audit and procurement functions.

We monitor closely the effectiveness of all the activities referenced above by recording all vetting undertaken and any gaps identified, which enables us to identify where suppliers may need support in protecting their employees and us. Details of the Key Performance Indicators we use and our progress against these are provided below.

6. Modern Slavery incidents

During the financial year ended 31 December 2025, we investigated:

- An allegation that a cleaning sub-contractor was working without valid Right to Work documents. We took appropriate steps by completing a detailed assessment of the contractor's processes, which resulted in their suspension. We have also introduced identification checks for cleaning contractors attending our properties.
- Two incidents whereby individuals between the ages of 16 and 18 were working as cleaning contractors which, whilst not illegal within the UK, requires Unite to be notified so we can ensure appropriate additional safeguards and working practices are in place. The necessary changes have since been implemented by the suppliers.

Having considered the outcome of our investigations into these allegations and incidents, we confirm that no violations of human rights under the UN Guiding Principles on Business Human Rights were found in our business or supply chains during the year.



7. Modern slavery training and awareness

Employees

As part of our corporate induction all new joiners are required to complete mandatory training which covers (amongst other topics) our Code of Ethics, Whistleblowing policy and Modern Slavery. This is then followed with annual refresher training.

Our modern slavery training has a strong focus on our local city teams, who are our eyes and ears on the ground at our properties, 24 hours a day throughout the year. We need to ensure these teams can detect any signs of modern slavery (including within the higher-risk outsourced activities such as cleaning and other property-related services) and therefore the training has been designed with the following objectives:

- Understand what modern slavery is
- Understand how to spot the signs and how to prevent it
- Speak up with confidence – feel empowered to raise concerns about modern slavery.

The training is interactive, with videos and scenario-based questions, and learners are required to pass a short test at the end, to assess their understanding.

Suppliers

During 2025, our supply chain modern slavery risk assessments identified 37 suppliers that required training on modern slavery. All of these suppliers were companies with a turnover below the threshold for reporting under Section 54 of the Modern Slavery Act 2015, however training was required to meet Unite's standards.

The supplier training, which we deploy electronically, provides an overview of what Modern Slavery is, the signs to look for within their business, and processes/activities they should consider to prevent it within their business.

The training we deliver to our people and suppliers supplements the ongoing work of the Procurement team, widening our vigilance across the business and supply chain.

8. Progress and next steps

We use the following key performance indicators to monitor our progress in implementing robust due diligence processes to reduce the risk of modern slavery:

Key performance indicators (KPI)	FY24	FY25	FY26	Change
Supplier Code acceptance by all new suppliers when onboarded	71% (Target: 80%)	100% (Target: 90%)	Target: 100%	▲
All new suppliers vetted for modern slavery risks when onboarded	76% (Target: 80%)	100% (Target: 90%)	Target: 100%	▲

% represents the percentage of suppliers by number

Looking ahead, we will continue to promote collaborative, sustainable and responsible business relationships with our supply chain partners and monitor our progress annually . We will also 1) enhance our physical audit of modern slavery risk in the summer peak period, where we assess the highest risk of modern slavery; and 2) identify how we can implement controls in the sub-contractor tiers of our supply chain.

9. Approval

Having regard to the nature of our business as a UK-based property business, our modern slavery risk assessment and the activities described within this statement, we are confident that our approach to tackling modern slavery is appropriately targeted.

This statement was approved by the Board on 15 May 2026.



Joe Lister
Chief Executive Officer



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