

2019 EPRA-sBRP Unite Students



EPRA Sustainability Performance Measures - Environment

Elec- Abs	Total electricity consumption	109,881,655. 35	kWh/yr.	<p>100% of this was supplied via the grid from certified (REGO) renewable sources (wind and solar). Although a small proportion of generation occurs on some sites from gas CHP and solar PV, this occurs "behind the meter" so is consumed on site thus reducing the quantity of grid electricity purchased.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed</p>
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				across the whole Unite Students portfolio.
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WORK
TOGETHER

BE
BETTER

DO WHAT'S
RIGHT

SEE IT
THROUGH

HAVE
FUN



INVESTORS
IN PEOPLE

Gold
Unit 2022

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Elec-LfL	Like-for-like total electricity consumption	105,667,611.79	kWh/yr	<p>100% of this was supplied via the grid from certified (REGO) renewable sources (wind and solar). Although a small proportion of generation occurs on some sites from gas CHP and solar PV, this occurs "behind the meter" so is consumed on site thus reducing the quantity of grid electricity purchased. This figure includes total consumption from sites that were in scope for both the reporting period and prior year, and pro rata consumption of reporting period's consumption for assets that were only in scope for a proportion of the prior year. For example if Site A was in scope for 12 months in both years its total consumption in the reporting year is included here. If Site B was in scope for some or all of the reporting period but none of the prior year it is excluded. If Site C was in scope for only 6 months of the prior year, then only 50% of its consumption in the reporting period is included here.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so</p>
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				<p>are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
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DH&C-Abs	Total district heating & cooling consumption	10,141,452.00	kWh/yr.	<p>100% of district heating consumption is assumed to be from non-renewable sources (e.g. gas CHP). No district cooling.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
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DH&C-LfL	Like-for-like total district heating & cooling consumption	9,745,993.50	kWh/yr	<p>100% of district heating consumption is assumed to be from non-renewable sources (e.g. gas CHP). No district cooling.</p> <p>This figure includes total consumption from sites that were in scope for both the reporting period and prior year, and pro rata consumption of reporting period's consumption for assets that were only in scope for a proportion of the prior year. For example if Site A was in scope for 12 months in both years its total consumption in the reporting year is included here. If Site B was in scope for some or all of the reporting period but none of the prior year it is excluded. If Site C was in scope for only 6 months of the prior year, then only 50% of its consumption in the reporting period is included here.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students'</p>
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				<p>direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
Fuels-Abs	Total fuel consumption	36,632,734.51	kWh/yr.	<p>100% of this fuel use is renewable grid supplied natural gas. Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore</p>

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				includes all energy consumed across the whole Unite Students portfolio.
Fuels-LfL	Like-for-like total fuel consumption	32,816,251.50	kWh/yr.	<p>Natural gas</p> <p>This figure includes total consumption from sites that were in scope for both the reporting period and prior year, and pro rata consumption of reporting period's consumption for assets that were only in scope for a proportion of the prior year. For example if Site A was in scope for 12 months in both years its total consumption in the reporting year is included here. If Site B was in scope for some or all of the reporting period but none of the prior year it is excluded. If Site C was in scope for only 6 months of the prior year, then only 50% of its consumption in the reporting period is included here.</p> <p>Residential student tenants in</p>

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				<p>Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
Energy -Int	Building energy intensity	3,196.21	kWh/bed/yr	<p>Sum total of Electricity + District Heat + Natural gas consumption per bed per year (pro rata treatment of acquisitions/ openings/ disposals). Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly,</p>

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				all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.
Energy -Int	Building energy intensity	112.08	kWh/m2/yr.	Sum total of Electricity + District Heat + Natural gas consumption per m2 floor area per year (pro rata treatment of acquisitions/ openings/ disposals). Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy

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				use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.
GHG-Dir-Abs	Total direct greenhouse gas (GHG) emissions (Scope 1)	6,851.08	metric tonnes CO2e/yr.	Scope 1 emission's, calculated using natural gas consumption data and UK DEFRA/BEIS emissions factors. Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.

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GHG-Indir-Abs	Total indirect greenhouse gas (GHG) emissions (location based Scope 2)	32,991.33	metric tonnes CO2e/yr.	<p>Scope 2 location based emissions, calculated using grid electricity consumption data and district heating consumption data and relevant UK DEFRA/BEIS emissions factor.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
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GHG- Indri- Abs	Total indirect greenhouse gas (GHG) emissions (market based Scope 2)	2,035.34	metric tonnes CO2e/yr.	<p>Scope 2 market based emissions, calculated using supplier's contractual emissions factor used for all grid electricity, which in this case is 0.0 as 100% of electricity us backed by REGOs purchased from the same supplier, and district heating consumption data and relevant UK DEFRA/BEIS emissions factor.</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for energy use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all energy consumed on site is deemed to be Unite Students' direct energy use and contributes directly to Scope 1 and 2 GHG emissions (as opposed to other real estate sectors where tenant's energy use constitutes Landlords' indirect energy use and hence Scope 3 GHG emissions). The figure reported here therefore includes all energy consumed across the whole Unite Students portfolio.</p>
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GHG-Int	Greenhouse gas (GHG) emissions intensity (Scope 1 + LOCATION based scope 2)	0.81	metric tonnes CO2e/bed/yr.	Scope 1 + location based 2 emission's, i.e. with UK DEFRA/BEIS standard grid emissions factor used for all grid electricity per bed per year (pro rata treatment of acquisitions/ openings/ disposals)
GHG-Int	Greenhouse gas (GHG) emissions intensity (Scope 1 + MARKET based scope 2)	0.18	metric tonnes CO2e/bed/yr.	Scope 1 + 2 market based emission's, i.e. with supplier's contractual emissions factor used for all grid electricity, which in this case is zero as 100% of electricity us backed by REGOs purchased from the same supplier per bed per year (pro rata treatment of acquisitions/ openings/ disposals)
GHG-Int	Greenhouse gas (GHG) emissions intensity (Scope 1 + LOCATION based scope 2)	28.51	metric tonnes CO2e/m2/yr.	Scope 1 + location based 2 emission's, i.e. with UK DEFRA/BEIS standard grid emissions factor used for all grid electricity m2 floor area (pro rata treatment of acquisitions/ openings/ disposals)

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GHG- Int	Greenhouse gas (GHG) emissions intensity (Scope 1 + MARKET based scope 2)	6.36	metric tonnes CO ₂ e/m ² /yr.	Scope 1 + 2 market based emission's, i.e. with supplier's contractual emissions factor used for all grid electricity, which in this case is zero as 100% of electricity us backed by REGOs purchased from the same supplier per m ² floor area per year (pro rata treatment of acquisitions/ openings/ disposals)
Water- Abs	Total water consumption	2,452,873.97	m ³ /yr.	All water consumed is from municipal mains water supply purchased under commercial supply contract, and for domestic use (sanitary and cooking use). Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for water use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all water consumed on site is deemed to be Unite Students' direct water use and contributes directly to Scope 3 emissions. The figure reported here therefore includes all water consumed across the whole Unite Students portfolio.

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Water-LfL	Like-for-like total water consumption	2,317,005.15	m3/yr.	<p>All water consumed is from municipal mains water supply purchased under commercial supply contract, and for domestic use (sanitary and cooking use). Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for water use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all water consumed on site is deemed to be Unite Students' direct water use and contributes directly to Scope 3 emissions. The figure reported here therefore includes all water consumed across the whole Unite Students portfolio.</p> <p>This figure includes total consumption from sites that were in scope for both the reporting period and prior year, and pro rata consumption of reporting period's consumption for assets that were only in scope for a proportion of the prior year. For example if Site A was in scope for 12 months in both years its total consumption in the reporting year is included here. If Site B</p>
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				was in scope for some or all of the reporting period but none of the prior year it is excluded. If Site C was in scope for only 6 months of the prior year, then only 50% of its consumption in the reporting period is included here.
Water-Int	Building water intensity	50.05	m3/bed/yr.	<p>All water consumed is from municipal mains water supply purchased under commercial supply contract, and for domestic use (sanitary and cooking use). Sum total of water consumption per bed per year (pro rata treatment of acquisitions/ openings/ disposals).</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for water use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all water consumed on site is deemed to be Unite Students' direct water use and contributes directly to Scope 3 emissions. The figure reported here therefore includes all</p>

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				water consumed across the whole Unite Students portfolio.
Water-Int	Building water intensity	1.75	m3/m2/yr.	<p>All water consumed is from municipal mains water supply purchased under commercial supply contract, and for domestic use (sanitary and cooking use). Sum total of water consumption per m2 floor area per year (pro rata treatment of acquisitions/ openings/ disposals).</p> <p>Residential student tenants in Unite Students properties pay a fixed all-inclusive rent and so are not billed for water use (this approach is common across the Purpose Built Student Accommodation real estate sector). Accordingly, all water consumed on site is deemed to be Unite Students' direct water use and</p>

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				<p>contributes directly to Scope 3 emissions. The figure reported here therefore includes all water consumed across the whole Unite Students portfolio.</p>
Waste-Abs	Total weight of waste by disposal route	<p>393.45 tonnes of non-hazardous waste to landfill 3,254 tonnes of non-hazardous waste diverted from landfill (no data available on processing route)</p>		<p>Unite Students residential student tenants are entitled to have their household waste collected by the local authority under the provision of council tax like any other domestic resident. Local authorities do not collect or publish any data on how this waste is then processed.</p> <p>However Unite Students have a nationwide contract with a framework waste management provider to collect all commercial waste generated by our management, maintenance and housekeeping activity, and at current our provider can provide data on the total quantity sent to landfill and the total quantity diverted from landfill, but no detail on how diverged waste is then processed. We are working to improve the quality of this data.</p>

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Waste-LfL	Like-for-like total weight of waste by disposal route	369.53 tonnes of non-hazardous waste to landfill 2,973.53 tonnes of non-hazardous waste diverted from landfill (no data available on processing route)		<p>Unite Students residential student tenants are entitled to have their household waste collected by the local authority under the provision of council tax like any other domestic resident. Local authorities do not collect or publish any data on how this waste is then processed.</p> <p>However Unite Students have a nationwide contract with a framework waste management provider to collect all commercial waste generated by our management, maintenance and housekeeping activity, and at current our provider can provide data on the total quantity sent to landfill and the total quantity diverted from landfill, but no detail on how diverted waste is then processed. We are working to improve the quality of this data.</p> <p>This figure includes total waste generated from sites that were in scope for both the reporting period and prior year, and pro rata generation of reporting period's waste for assets that were only in scope for a proportion of the prior</p>
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				<p>year. For example if Site A was in scope for 12 months in both years its total waste in the reporting year is included here. If Site B was in scope for some or all of the reporting period but none of the prior year it is excluded. If Site C was in scope for only 6 months of the prior year, then only 50% of its waste in the reporting period is included here.</p>
Cert-Tot	Type and number of sustainably certified assets	20 BREEAM New Construction certified properties. 100% have EPCs		<p>All properties have a UK Non-domestic Energy Performance Certificate and comply with the Minimum Energy Efficiency Standards in England and Scotland.</p> <p>20 properties have BREEAM New Construction certificates: 10 Excellent rated, 9 Very Good rated and 1 Good rated. Ratings are concentrated in our most recent developments. By property numbers this constitutes 16% of the portfolio; by floor area this constitutes 20% of the portfolio, and by asset value 28% of the portfolio.</p>
EPRA Sustainability Performance Measures - Social				

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Diversity-Emp	Community engagement, impact			Across whole organisation: 48.7% women, 51.3% men. Across Governance Body (Board) 22% women, 78% men.
Diversity-Pay	Gender pay ratio			See http://www.unite-group.co.uk/sites/default/files/2018-02/Gender-Pay-Gap-2018_1.pdf for more details
Emp-Training	Training and development			Average completed in 2018 is 2.8 hours per employee.
Emp-Dev	Employee performance appraisals	100%		All employees set annual objectives with their line manager then also formally review these at the end of the reporting period. Line managers are expected to hold regular, ideally monthly, 1 to 1 personal development and performance review meetings.
Emp-Turnover	Employee turnover and retention			Total number of employees at the end of 2018 - 1459 Number of employees who have left - 437 2018 New Employee Hire Rate 722/49.49%

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H&S- Emp	Employee health and safety			<table border="1"> <thead> <tr> <th>Person Injured</th> <th>Number of Accidents</th> <th>Number of accidents per 1,000 beds</th> </tr> </thead> <tbody> <tr> <td>Minor < 18</td> <td>1</td> <td>0.0</td> </tr> <tr> <td>Member of Public</td> <td>10</td> <td>0.2</td> </tr> <tr> <td>Visitor</td> <td>10</td> <td>0.2</td> </tr> <tr> <td>Contractor</td> <td>15</td> <td>0.3</td> </tr> <tr> <td>Customer</td> <td>113</td> <td>2.3</td> </tr> <tr> <td>Employee</td> <td>144</td> <td>3.0</td> </tr> <tr> <td>Total</td> <td>293</td> <td>6.0</td> </tr> </tbody> </table>	Person Injured	Number of Accidents	Number of accidents per 1,000 beds	Minor < 18	1	0.0	Member of Public	10	0.2	Visitor	10	0.2	Contractor	15	0.3	Customer	113	2.3	Employee	144	3.0	Total	293	6.0
Person Injured	Number of Accidents	Number of accidents per 1,000 beds																										
Minor < 18	1	0.0																										
Member of Public	10	0.2																										
Visitor	10	0.2																										
Contractor	15	0.3																										
Customer	113	2.3																										
Employee	144	3.0																										
Total	293	6.0																										
H&S- Asset	Asset health and safety assessments			0																								
H&S- Comp	Asset health and safety compliance			TBC																								
Comty- Eng	Employee turnover and retention assessments and development programmes	2		These are schemes that have been developed due to a need identified with in a particular community. The engagement and associated activity/program have been developed to address this particular issue.																								
EPRA Sustainability Performance Measures - Governance																												

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Gov-Board	Composition of the highest governance body	Details are set out on Page 56 to 65 of our 2018 Annual Report:		<p>Number of Executive Board Members: 2</p> <p>Number of Non-Executive Board Members: 7</p> <p>Average tenure on the board: 9 years</p> <p>Number of Non-Executive Board Members with competencies relating to environmental and social topics: All board members have undergone training on key legal and regulatory changes including a focus on GDPR and Corporate Governance developments during 2018, as set out on pg. 61 of our Annual Report.</p>
Gov-Select	Nominating and selecting the highest governance body	Details are set out on Page 66 and 67 of our 2018 Annual Report:		<p>The Nomination Committee focus this year was on the appointment of two new Non-Executive Directors, which led to the successful appointment of Ilaria del Beato and Richard Akers. The Committee also focused on our diversity and inclusion initiatives, together with talent development and succession planning. The Committee continued with its approach of mapping the business's strategic objectives and growth ambitions against our wider leadership and high-performing, high-potential individuals. Where gaps have</p>

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			<p>been identified, the Committee ensures a suitable programme is in place to deliver our leaders of tomorrow with the right skills and experience. Succession planning for the Chairman, led by Elizabeth McMeikan our Senior Independent Director, will be a specific focus for 2019.</p> <p>The Committee consists entirely of Non-Executive Directors. The members of the Committee are set out on page 60 of the Corporate Governance Statement. At the invitation of the Committee, any other Director or other person may be invited to attend meetings of the Committee if considered desirable in assisting the Committee in fulfilling its role.</p> <p>Role The role of the Committee is to:</p> <ul style="list-style-type: none"> — Ensure that appropriate procedures are adopted and followed in the nomination, selection, training, evaluation and re-election of Directors and for succession planning, with due regard in all cases to the benefits of diversity on the Board, including gender — Regularly review the
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				<p>structure, size, composition, skills and experience of the Board and to make recommendations with regard to any adjustments considered necessary</p> <ul style="list-style-type: none"> — When it is agreed that an appointment to the Board should be made, lead a selection process that is formal, rigorous and transparent — Be responsible for identifying, reviewing and recommending candidates for appointment to the Board. <p>The Committee reviewed the Board's composition to ensure it has the correct balance of skills, experience, independence and knowledge. Recognising that the average tenure of the Non-Executive Directors was just over six years – and to help ensure orderly succession planning – the Committee believed it was timely to consider appointing two new Non-Executive Directors. The Committee led a recruitment process resulting in the appointment of Richard Akers in September 2018 and Ilaria del Beato in December 2018. Russell Reynolds led the search for these Non-</p>
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				<p>Executive Directors. Russell Reynolds has no other connection with the Company. Succession planning As per prior years, the Committee reviewed the Board's succession planning, to ensure we have a deep talent pipeline for future Board appointments. As an integral part of our executive succession planning, the Committee oversees the Senior Leadership Development Programme (part of a broader Skills Development Programme) to ensure we are growing and nurturing our talent and developing our high-performers, high-potential.</p> <p>The Board recognises that diversity, equality and inclusivity at Board level and throughout the Group are critical components of our long-term sustainability. We are proud of the diversity of the Group as a whole, an organisation made up of people, who like our customers, are from many different backgrounds and countries and have diverse experiences, perspectives and skills. Beyond the boardroom</p>
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				<p>and within Unite more generally, we continued to review our approach to diversity, equality and inclusion during 2018. We recognise this as a key building block of our People strategy and that the UK workforce and our students are increasingly diverse. To remain competitive, we need to develop a diverse, equal and inclusive workplace which will in turn best represent and support our customers in creating a Home for Success. During 2018, our diversity and inclusivity initiatives focused on:</p> <ul style="list-style-type: none"> — Launching our Women's Network — Developing our Diversity in Action Group launched in 2017 and led by, and for, employees. Widening our recruitment channels to bring in increased diversity — Continued with our annual Diversity, Equality and Inclusion e-Learning for all employees — Ensuring all customer-facing teams are diverse and appropriately representative of our local community and our students — Actively supporting our high-potential
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				<p>female employees</p> <ul style="list-style-type: none"> — Ensuring all leadership roles have diverse candidates on the shortlist — Worked with Stonewall, Business in the Community and the Business Disability Forum to raise our awareness — Reviewing our HR policies and procedures to be more inclusive with related line manager training — Planning to support our non-UK EU employees as part of our Brexit readiness planning — Training all recruiting managers and the resourcing team on unconscious bias, to ensure that we are recruiting the best person for the job. In 2019, we will focus on: <ul style="list-style-type: none"> — Our Women's Network followed by further networks as appropriate — Growth of our Diversity in Action Group — Continuing our Focus groups and Pulse Surveys across the organisation to understand more about our employees' needs — Use of specialist job boards to support sourcing diverse candidates — Further recruitment training for all hiring managers
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				<p>— Continue to work with Stonewall, Business in the Community and the Business Disability Forum</p> <p>— Work Equality Index completed and recommended actions taken. We have set diversity targets for our People with 40% women in leadership roles by 2020. We are currently at 37%. As regards to the Board itself, the Nomination Committee considered during 2018 whether it wanted to set specific targets for female representation on the Board. The Committee believes the current focus of diversity and inclusivity should be on the Group as a whole, with the development of a diverse and inclusive talent pipeline incorporating the initiatives outlined above. The Committee is not currently considering setting diversity targets for the Board itself, believing this is not necessarily in the best interests of the Group and its stakeholders. However, gender diversity, along with all other aspects of diversity and inclusivity, will be considered, along with its more general remit to consider the balance of skills,</p>
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				<p>experience, independence and knowledge when reviewing appointments to the Board.</p> <p>The Board has overall responsibility for the Group's system of internal control. However, such a system is designed to achieve business objectives and can only provide reasonable and not absolute assurance against material misstatement. The provisions of the Code in respect of internal controls require that Directors review and monitor all controls, including operational, compliance and risk management as well as financial controls. Through reports from the Board's Committees, the Group's Risk Committee and the Group's Business Unit Boards (the Operations Board and Property Board), the Board has reviewed the effectiveness of the Group's system of internal controls for the period covered by the Annual Report and Accounts and has concluded that such controls were effective throughout such period. Further information on the Company's internal control</p>
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				<p>framework is set out in the Audit Committee report on pages 68 to 71. The Board delegates certain of its duties, responsibilities and powers to the Audit Committee, so that these can receive suitably focused attention, but in so doing the Audit Committee acts on behalf of the full Board, and the matters reviewed and managed by the Audit Committee remain the responsibility of the Directors taken as a whole.</p>
Gov-Col	Process for managing conflicts of interest	Details are set out on Page 96 of our 2018 Annual Report:		<p>The Company has procedures in place for managing conflicts of interest. A Director must notify the Chairman (and the Chairman notifies the Chief Executive) if he/she becomes aware that he/she, or any of his/her connected parties, may have an interest in an existing or proposed transaction with the Company or the Group. Directors have a continuing duty to update any changes to these conflicts.</p>