

# Our Modern Slavery Statement

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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 2022. 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 100 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 (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 2022 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. Our policies are reviewed on an annual basis and when there are changes in relevant legislation. 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, objectivity, integrity and without discrimination.

**Our Sustainable Procurement Policy** – this policy was refreshed in early 2023 and 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. 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.

**Supplier Code of Conduct** - sets out our expectation of supplier conduct in accordance with the highest standards of business and personal ethics.

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

## Our people

As of 31 December 2022, the Unite Group had 1900 employees. These employees operate our 157 properties across the UK, providing homes to over 70,000 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, objectivity 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.

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 £10.90 outside London and £11.95 in London. The Government’s current national living wage is £10.42. 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. Our Sustainability Strategy is focused on delivering a positive impact through people and places which is driven by the social contribution we make to the students who live with us, our employees as well as our progress in minimising our impact on the environment. Following the re-launch of our Positive Impact programme in 2022, 100% of our properties achieved a Bronze award with a number of our city teams across the business working towards Silver and Gold awards by setting up long-term projects and collaborations within the local community to deliver real social or environmental benefit. all properties achieved a Bronze award

Our Sustainability Committee continues to oversee the implementation of our Sustainability Strategy focused on environmental, social and governance issues.

Our Net Zero Carbon Pathway (the Pathway) was published in December 2021 and sets out our pledge to be net zero carbon by 2030. The Pathway includes a detailed breakdown of our baseline carbon emissions and targeted reductions, the key activities of our delivery strategy and associated metrics to track our progress. [For more information please read: Unite Students Net Zero Pathway | Unite Group.](#)

Throughout 2023 we are conducting a wider employment policy review, which includes our Code of Conduct on Employment Practices. We will also continue to implement our refreshed corporate induction process to highlight employee responsibilities and 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 cleaning, property preventative and reactive maintenance, property lifecycle works, as well as other technical services related to utilities and health & safety). 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.

In support of this, 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 encourages 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 maintenance and cleaning 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 temporary labour at our properties for more than 8 weeks, is contracted as a payrolled fixed term contractor and covered by the Agency Worker Regulations where applicable.

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.

As part of our engagement with suppliers, we are working hard to cut water use, reduce waste and improve recycling across our estate, and to engage with our supply chain to quantify and declare the impact of products and services.

To ensure we have longer term and sustainable supplier relationships that align to our principles, we reviewed our procurement approaches and strategy during 2022 and have developed a new suite of approaches to ensuring governance within our supply chain, one of which is the launch of the Supplier Code of Conduct which all preferred suppliers need to commit to and follow; an approach that will be broadened during 2023 to all suppliers. Our dedicated Supplier Zone page can be found at: [Our suppliers | Unite Group](#)

## 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 cleaning, property development and management services.

As part of our procurement strategy 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;
- assess compliance with Modern Slavery legislation – as well as broader sustainability and responsibility – in our competitive tender stage;
- 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 have now introduced both a new procurement process that ensures a high level of risk assessment in the selection stages, and a Supplier Relationship Management framework that continues to assess risk during the life of a supply contract.

Our dedicated Supplier Zone provides details of our confidential whistleblowing reporting service so that any supplier concerns or conflicts can be raised in confidence.

## 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 and health & safety performance (this includes health factors for workers and safe working practices). Throughout 2022 we reviewed our wellbeing offering for construction operatives and engaged with external providers to improve mental health and wellbeing awareness across our development sites. We are also taking steps to implement recommendations from the British Safety Council following a Wellbeing Gap Analysis conducted during 2022.

We closely manage the performance of our supply chain, with a proactive approach to competitive tenders in key spend or risk categories, 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.

During 2022, we introduced an audit regime providing assurance that our standards are being met across the operational side of the business.

## Training and engagement

We provide our employees with extensive training across a wide range of topics with a focus on working conditions such as health & safety, security, fire safety, diversity, equity, inclusion, belonging and wellbeing. Relevant employees are also provided with specific recruitment training which includes evidence of the right to work in the UK. Through our refreshed corporate onboarding and induction, we ensure sufficient information about the business, roles and properties is provided to new joiners. This includes information about our Whistleblowing Policy, which encourages our people to raise concerns in confidence.

We engage with our employees through various channels, including regular employee surveys 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.

Our employee engagement forum, Culture Matters, provides an opportunity for employee representatives from across the business to engage with the senior leadership team including our Non-Executive Director for Employee Engagement, and to provide employee feedback.

Through our approach we continue to operating with integrity and transparency and by putting 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.

We will continue to promote collaborative, sustainable and responsible business relationships with our supply chain partners and will monitor our progress annually to ensure the effectiveness of our policies and actions.

This statement was approved by the Board on 18 May 2023

**Richard Smith**

**Chief Executive Officer**

18 May 2023