

Our Modern Slavery 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 2021. 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 350 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 2021 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, objectivity, 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

As of 31 December 2021, The Unite Group had 1900 employees. These employees operate our 172 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, 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 £9.50 outside London and £10.85 in London. This remains higher than the Government’s current national living wage of £8.91. 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.

2021 saw the re-launch of The NUS Positive Impact programme. This scheme is a collaboration between the business and the National Union of Students aimed at helping students adopt lasting sustainable living habits through wellbeing, community and social impact initiatives and is comprised of a network of champions across the operation and support side of the business.

In addition, our Sustainability Committee was formed in 2021 to oversee the implementation of our Sustainability Strategy published earlier in the year consisting of five pillars covering 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](#).

Through the year we also reviewed our Code of Conduct on Employment Practices and our approach to temporary resourcing, and implemented a new onboarding process to strengthen the steps we are taking to prevent modern slavery in our business and supply chain.

Our focus for 2022 will be reviewing our policies and procedures and updating our corporate induction process to highlight employee responsibilities and the ways in which our employees can be part of a responsible and sustainable business. A community engagement strategy is also being developed to ensure greater ongoing engagement from the development stage through to operations.

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.).

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 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.

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.

Furthermore, to ensure we have longer term and sustainable supplier relationships that align to our principles, we commenced a review of our procurement approaches and strategy during 2021 and we continue to expand this approach in 2022.

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.

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 continue to review this approach and are developing an enhanced risk assessment of our supply chain which will be launched in 2022.

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. Throughout 2021, PH7 Health provided a Wellbeing programme for 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. During 2022, we will be introducing an audit regime to provide assurance that our standards are being met.

Training and engagement

We provide our employees with extensive training across a wide range of topics covering working conditions, such as health & safety, security, fire safety, equality, diversity and inclusion and wellbeing. Throughout 2021, this training included Covid-19 and ensuring safety in our properties.

We engage with our employees through various channels, including regular employee surveys covering topics such as equality, diversity and inclusion and in 2021 we hired a Diversity, Inclusion & Wellbeing lead who is developing our ED&I and wellbeing strategy. We hold "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 new employee engagement forum, Culture Matters, was established during 2021 and provides an opportunity for employee representatives from across the business to engage with the senior leadership team and to provide employee feedback.

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. We will continue to monitor our progress annually to ensure the effectiveness of our policies and actions.

This statement was approved by the Board on 30 June 2022

Richard Smith

Chief Executive

30 June 2022