

PRO-002
OUR SUPPLIER CODE

Version Number:2023/v1.0

Table of Contents

Click on the section header to be taken straight to the corresponding page.

1	Introduction.....	3
1.1	Purpose	3
1.2	Scope	3
1.3	Responsibilities	3
1.4	Definitions.....	4
1.5	References	4
2	Policy	4
2.1 Intent of the Code.....	4
2.2 Principles of the Code.....	4
2.3 Key Outcomes	6
2.4 Sanctions.....	7
	Appendix A – Document Control Information	8

1 Introduction

1.1 Purpose

Our Supplier Code sets out the standards that we expect all our suppliers to follow in trading with, and that they can expect of working with, Unite Students. It exists to be clear that malpractice in our supply chain has no home at Unite Students.

1.2 Scope

The Supplier Code applies to all suppliers, or potential suppliers, before, during and after doing business with Unite Students. The code equally applies to all Unite employees who are required to engage with third parties on behalf of Unite Students.

1.3 Responsibilities

All suppliers, including potential suppliers, are expected to ensure that any employee that form part of its relationship with Unite, understand and abide by the content of this Code before, during and after doing business with Unite Students.

All Unite Students employees are responsible for adherence to the Code.

Heads of Department and / or Functional Directors are responsible for ensuring there is clear and consistent messaging about our standards in trading and working with our suppliers before, during, or after trading. They are accountable for reporting and taking action where non-compliance is identified.

All members of the Procurement function are responsible for adhering to the Code, communicating, vetting and upholding its principles during supplier selection and management, reporting and taking action where non-compliance is identified.

1.4 Definitions

GDPR: The General Data Protection Regulation, implemented within UK legislation as The Data Protection Act 2018

IR35: Off payroll working rules for contractors (UK legislation)

Modern Slavery:

Supplier(s): All third-party companies that supply Unite Students with goods, materials, products and services, including contractors and sub-contractors

1.5 References

PRO-001 Procurement Policy

PRO-003 Sustainable Procurement Policy

PRO-004 Supplier Relationship Management Policy

2 Policy

2.1 Intent of the Code

Our goal is to lead on sustainability and raise standards in the living sector. For Unite Students, working responsibly and sustainably isn't optional, we always operate with integrity and transparency and expect our suppliers to do the same.

As such, only Suppliers that agree to and uphold the Unite Students' Supplier Code shall do business with our company.

2.2 Principles of the Code

Unite Students will:

- Lead a respected and fair procurement process, be that during selection, negotiation, in-life or at the end of any trading relationship

- Have an open, trusted and fair relationship with all suppliers, regardless of their size
- Be professional and confidential, handling commercial and sensitive information with care, always
- Keep our suppliers and partners close – we believe our suppliers are key to our success, and this mutual benefit should be listened to
- Work in accordance with the terms & conditions that set out our trading relationship, be that by purchase order and standard terms, or under a mutually agreed contract
- Promote transparent business practices – unethical practices, conflicts of interest, fraud, tax evasion, bribery, corruption and coercion, have no place in our supply chain
- Take care of the safety and working conditions of both our and our suppliers' employees and colleagues - we partner only with businesses that show the same engagement, making no concessions when it comes to their health and safety
- Maintain and where possible exceed legislative requirements, be that Modern Slavery, GDPR, IR35, National Living Wage, tax compliance, or any other legal standard, and expect that our suppliers are able to mirror this
- Practice diligence in our supplier selection and management – checking for risk and compliance, and managing this appropriately
- Demonstrate the actions we undertake to ensure Diversity, Equity, Inclusion and Belonging in our supply chain
- Pay due and correct invoices promptly and in line with our agreed terms
- Ultimately, only engaging and working with suppliers that are able to uphold our Supplier Code.

In trading with Unite Students, our suppliers will:

- Conduct themselves transparently and openly in their business practices – our suppliers (prospective or in working with us) understand that unethical practices, conflicts of interest, fraud, tax evasion, bribery, corruption and coercion, have no place in our supply chain and do not offer anything that may be considered as such to any of our colleagues
- Be professional and confidential, handling commercial and sensitive information with care even if it is not covered by contractual provisions

- Be our trusted advisors - suppliers are key to our success, and we listen to your voice on how together we can improve
- Maintain and where possible exceed legislative requirements, upholding all our policies and keeping their own affairs up to date, be that GDPR, Modern Slavery, IR35, tax compliance, or any other legal standard and, on request, are able to consistently demonstrate that they do so
- Minimise both their own and our impact on the environment – helping us to meet and exceed sustainability targets by assigning responsibility to a Senior Management representative and having appropriate sustainability
- Understand their impact on the micro and macro community – actively promoting corporate social responsibility
- Demonstrate the actions they undertake to ensure Diversity, Equity, Inclusion and Belonging in the workplace
- Help us to help them be paid efficiently and on time by only accepting orders with a valid Unite Students Purchase Order and always quoting it in full on any invoice
- Safeguard the integrity and security of their systems and comply with the relevant government standards and guidance. Suppliers must inform us if they become aware of any cyber security incident that affects or has the potential to affect us or our data
- Work in accordance with the terms & conditions that set out any trading relationship, be that by purchase order or under a mutually agreed contract
- Take care of the safety and working conditions of both our and their employees and colleagues – training, communicating, supporting and making no concessions when it comes to health and safety.

2.3 Reporting a conflict with our Code

If you feel a person or company connected with our business is doing something that you believe may be illegal or conflict with our Supplier Code (for example actions that put the health and safety of our people, customers, suppliers or public at risk, discrimination, anti competitive behaviour, or fraud), you should report it anonymously using our independent, confidential reporting service:

0800 069 8754 or www.unitestudents.ethicspoint.com

2.4 Key Outcomes

By us all working together to achieve this code, we can continue to uphold Unite as a great company for our Suppliers to work with – open, transparent and fair – and ensuring that malpractices in our supply chain have no home at Unite Students.

2.5 Sanctions

Any supplier that breaches this policy may have their services with us cancelled with immediate effect and be removed from our purchasing systems.

Any employee who breaches this policy is subject to disciplinary action up to and including dismissal.

Appendix A – Document Control Information

Document Management			
Document Ref / Title		PRO-002 Supplier Code	
Version #	1.0	Status	Live
Classification		Public (everyone has access)	
Reason for development		Procurement guidance for suppliers	
Summary of changes		New policy	
Applicable parties		Colleagues and suppliers	
Author(s) (name / title)		Eleanor Biddiscombe	
Owner (name / title)		Eleanor Biddiscombe, Procurement Director	
Function		Procurement	
Approved by (name/ title)		Procurement Steering Group	
Date Approved		03/05/2023	
Review date		03/05/2024	
Location		The Hub, Externally - Supplier zone (website)	
Distribution		All colleagues and suppliers	
Consultation			
<input checked="" type="checkbox"/> Data Protection	<input type="checkbox"/> Communications	<input type="checkbox"/> NCC / ECC	<input type="checkbox"/> Field Operations
<input type="checkbox"/> Sales	<input type="checkbox"/> IT Service Desk	<input type="checkbox"/> IT	<input type="checkbox"/> Operations Support
<input type="checkbox"/> Finance - AR	<input type="checkbox"/> Legal	<input checked="" type="checkbox"/> InfoSec	<input type="checkbox"/> People (HR)
<input type="checkbox"/> Finance - AP	<input checked="" type="checkbox"/> Procurement	<input type="checkbox"/> Health and Safety	<input type="checkbox"/> Insight and Analytics
<input type="checkbox"/> Finance - Treasury	<input checked="" type="checkbox"/> Environment	<input type="checkbox"/> Marketing	<input type="checkbox"/> Asset Management
<input type="checkbox"/> Digital	<input type="checkbox"/> Quality and Standards	<input type="checkbox"/> PMO	<input type="checkbox"/> Customer Experience
<input type="checkbox"/> Commercial Finance	<input type="checkbox"/> Acquisition / Development	<input type="checkbox"/> Student Support	<input type="checkbox"/> Culture Matters
Version History (copy and paste from top section to here as a record)			
Version	Date approved	Author	Summary of changes
1.0	28/04/23	Eleanor Biddiscombe	First release