

## Code of Ethics

The Unite Group plc (the “**Company**”) and each of its subsidiary and associated companies (together “**Unite Students**”) seeks at all times to conduct its business in accordance with, and to ensure that each of its employees and directors adheres to, the highest standards of business and personal ethics. In particular, it is required that each employee and director of Unite Students must:

- exercise honesty, objectivity, integrity and non-discrimination;
- exercise professional competence and due care;
- not enter into any activity which may result in a conflict of interest with Unite Students;
- not accept or give anything of value which could be construed as a bribe or an inducement;
- not disclose to others or use for personal gain any confidential information relating to Unite Students;
- report any suspected fraudulent, corrupt or illegal activity.

### Honesty, Objectivity, Integrity and Non-Discrimination

All employees must practice honesty, objectivity and integrity in every aspect of their dealings with other Unite Students employees, the public, the business community, shareholders, customers, suppliers and government authorities. All employees must comply with and act within the applicable laws and regulations. Unlawful discrimination against employees, shareholders, directors, officers, customers or suppliers on account of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation is prohibited. All employees must treat persons with whom they come into contact with dignity and respect.

### Professional Competence and Due Care

All employees are required to maintain relevant knowledge and skills at the level required to ensure all our activities are performed to the highest standards and with due care.

### Conflicts of Interest

Company policy prohibits certain conflicts between the interests of its employees and those of Unite Students. It is not possible to provide a complete definition of what constitutes a prohibited conflict of interest. There are, however, certain situations that will always be considered a prohibited conflict of interest. Examples of these are when an employee (or any person having a close personal relationship with an employee):

- obtains a significant financial or other beneficial interest in one of Unite Students’ suppliers, customers or competitors without first notifying the Company and obtaining written approval from the Company Secretary;
- engages in a significant personal business transaction involving Unite Students for profit or gain, unless such transaction has first been approved in writing by the Company Secretary; or
- learns of a business opportunity through association with Unite Students and invests in that opportunity without first seeking the prior written approval of the Company Secretary.

Any employee aware of any actual or potential conflict of interest must disclose the same to the Company by notifying the Company Secretary. Each situation will be considered on an individual basis and the mere fact of disclosure will not necessarily mean that the situation will be considered substantial enough to be prohibited.

### **Anti-Bribery Policy**

The Company has a zero tolerance of bribery and corruption. All directors and employees of the Company are required to comply with the Anti-Bribery Policy and follow the rules and procedures set out in our Gifts & Hospitality Policy, as it applies to them.

### **Facilitation of tax evasion**

Employees of the Company must not attempt to evade tax, persuade another person to evade tax, or knowingly assist or take any steps to help another person evade tax. Where an employee becomes aware of any suspected fraudulent evasion of tax, they must inform the Company immediately by notifying the Company Secretary.

### **Breaches of the Code of Ethics and reporting breaches**

If you suspect that a breach of the law, regulations or this Code of Ethics may have taken place, you must report it to the Company. This can be done through your line manager, to the People team or the Company Secretary.

If you are not comfortable with any of the above three options, we also provide an independent, confidential reporting service. This service is available 24 hours a day and allows you to report your concern anonymously by calling 0800 069 8754 or visiting [www.unitestudents.ethicspoint.com](http://www.unitestudents.ethicspoint.com).

We treat breaches of this Code of Ethics seriously and if we have reason to believe a breach may have occurred, we will investigate and take appropriate action, which may result in disciplinary action against an employee.

**Joe Lister**  
Chief Executive