

Our Modern Slavery Statement for the year ended 31 December 2023

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 2023. 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 2023 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:

Employment Practices and Human Rights Policy – among other things, sets out our commitment to ensure all employment with us is on a voluntary basis and outlines how we will conduct our business to uphold and respect internationally recognised human rights standards as set out in the [Universal Declaration of Human Rights \(UDHR\)](#) and the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

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 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 and suppliers to raise concerns in confidence and provides protection for qualifying disclosures.

Our people

As of 31 December 2023, the Unite Group had 1900 employees. These employees operate our 158 properties across the UK, providing homes to over 70,000 students.

Our **Human Rights Policy** sets out our commitment to ensure all employment with us is on a voluntary basis. Our **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 Real 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 £12.00 outside London and £13.15 in London. The Government’s current national living wage is £11.44. 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, as set out in our Sustainability [Framework](#). 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. We also remain committed to investing 1% of adjusted profits to social initiatives.

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. During 2023, 100% of our teams achieved at least a Bronze award with 20 community projects receiving silver and 9 community projects achieving gold. These awards represent long-term projects and collaborations within the local community to deliver real social or environmental benefit. Our Board 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) 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](#). In 2023 we also published our new [Sustainable Construction Framework](#) setting out our ambition and approach to creating more sustainable new builds.

Throughout 2023 we conducted an employment policy review and launched refreshed training across the business on key policies, including our Code of Ethics and Whistleblowing policy. These corporate policies highlight employee responsibilities and 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 during 2024 will be engaging with key partners within our supply chain to quantify and declare the impact of products and services.

Through our Sustainable Procurement Policy, we also launched our Supplier Code of Conduct - setting out expectations in accordance with the highest standards of business and personal ethics which all suppliers need to commit to and follow as part of onboarding – alongside a dedicated Supplier Zone page, which can be found at: [Our suppliers | Unite Group](#).

Modern Slavery Risk assessment

We consider our most significant risk 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 issues – in our competitive tender process;
- assess modern slavery risk for all new suppliers regardless of size, turnover, or type of supply, as part of our supplier onboarding;
- carry out enhanced vetting for modern slavery for higher risk categories of supply (such as cleaning), delving further into their working and payment practices for their workers;
- offer our confidential whistleblowing reporting service to all suppliers and their employees, so that any concerns or conflicts can be raised in confidence; and
- assess risk within our supply chain tiers – during 2024, we plan to launch an enhanced assessment of the sub tiers within our supply chain .

Our procurement process 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.

Measuring our effectiveness in the supply chain

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. An independent third party 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). We regularly review our wellbeing offering for construction operatives and engage with external providers to improve mental health and wellbeing awareness across our development sites.

We closely manage the performance of our supply chain and adherence to required standards. Our Supplier Relationship Management Framework maps out how we do so based upon risk and spend, using tools such as performance reviews, data, audits and evaluations. Our Supplier Relationship & Performance team ensure this is followed by not only the procurement function, but also the wider business in the relationships maintained with third parties.

Our internal audit regime provides 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 seeking evidence of the right to work in the UK. Through our corporate onboarding and induction, we ensure sufficient information about the business, roles and properties is provided to new joiners. This includes information about our Code of Ethics and Whistleblowing Policy, which encourages our people to raise concerns in confidence.

Furthermore, as part of our preparation for the summer turnaround where use of cleaning and other contractors is at its peak, we will be communicating with our operational teams on what to look for as potential signs of modern slavery.

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 operate with integrity and transparency by putting robust governance and management processes in place. This ensures 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 16 May 2024.

Joe Lister
Chief Executive Officer