

PRO-002  
OUR SUPPLIER CODE

Version Number:2025/v2.0

## 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 is based upon the policies and processes that exist internally to our business, specifically identifying those that are important to see reflected in our Supply Chain. It is intended to be clear that malpractice or unethical ways of working 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 forms part of its relationship with Unite, understands and abides 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.

The Procurement function is responsible for defining the Supplier Code and respective strategies upon which the supply chain should be sourced and managed.

### 1.4 Definitions

**Data Protection:** means 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:** Modern Slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

**Supplier(s)/Supply Chain:** All third-party companies that supply Unite Students with goods, materials, products and services, including the contractors and sub-contractors used within their own supply chain.

### 1.5 References

PRO-001 Procurement Policy

PRO-003 Sustainable & Ethical Procurement Policy

PRO-004 Supplier Relationship Management Policy

Third Party Code of Connection (v 2025/1.0)

## 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.

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 [www.unitestudents.ethicspoint.com](http://www.unitestudents.ethicspoint.com).

## 2.2 Principles of the Code

### Unite Students will:

- Uphold our Supplier Code, leading the way with the principles it contains both within our own business and our Supply chain.
- Lead a respected and fair procurement process, be that during selection, negotiation, in-life or at the end of any trading relationship. Practicing diligence in our supplier selection and management – checking for risk and compliance, and managing this appropriately.
- Have an open, trusted and fair relationship with all suppliers, regardless of their size.
- Keep our suppliers and partners close – we believe our suppliers are key to our success, and this mutual benefit should be listened to.
- Be a fair, clear, and transparent business – this includes having a zero-tolerance policy on bribery or corruption, ensuring that all activity is undertaken in accordance with the highest standards of business and personal ethics in accordance with this Supplier Code and always demonstrating processes and systems in place that prevent any offence under the UK Bribery Act 2010.
- Disclose in advance any relationship with a Unite Students director, officer or employee, or any other person or entity working with Unite that represents or might appear to represent a conflict of interest.
- Never directly or indirectly offer, promise, receive from or give to any person working for or engaged by our Suppliers (including their contractors and suppliers) a financial reward, gift or other such advantage to induce the person to perform, or reward the person for performing, improperly a relevant function or activity.
- Uphold our policies and systems to prevent a UK and/or foreign tax evasion facilitation offence under sections 45(1) and 46(1) of the Criminal Finances Act 2017 respectively.
- Be professional and confidential, handling commercial and sensitive information with care, always.
- Maintain confidentiality of all information accessed and that it complies with all Data Protection legislation.
- 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. Paying due and correct invoices promptly and in line with our agreed terms.
- Take care of the safety and working conditions of both ours and our suppliers' employees and colleagues - we partner only with businesses that show the same standards, making no concessions when it comes to their health and safety.
- Build an anti-fraud culture that ensures any employee, agent, subsidiary, or other associated person is unable to

commit a fraud intending to benefit the organisation – working with Unite Students to openly and transparently provide information that may be requested to investigate possible fraud or review anti-fraud measures.

- Maintain and where possible exceed legislative requirements, be that Modern Slavery, Data Protection, IR35, National Living Wage, tax compliance, or any other legal standard, and expect that our suppliers are able to mirror this.
- Demonstrate the actions we undertake to ensure Diversity, Equity, Inclusion and Belonging in our supply chain.
- Ultimately, only engaging and working with suppliers that are able to uphold our Supplier Code.

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### In trading with Unite Students, our suppliers will:

#### 1.1 In relation to Ethical Conduct:

- Uphold our Supplier Code.
- Have their own supply chain code of conduct in place or agree to follow and communicate to their own supply chain that of Unite Students.
- Be our trusted advisors - suppliers are key to our success, and we listen to your voice on how together we can improve
- Strive to be a member of recognised responsible sourcing scheme certifications, such as BES6001, ISO14001, ISO50001 or any other material related equivalent standards.
- Be a fair, clear, and transparent business – this includes having a zero-tolerance policy on bribery or corruption, ensuring that all activity is undertaken in accordance with the highest standards of business and personal ethics in accordance with this Supplier Code and always demonstrating processes and systems in place that prevent any offence under the UK Bribery Act 2010.
- Disclose in advance any relationship with a Unite Students director, officer or employee, or any other person or entity working with Unite that represents or might appear to represent a conflict of interest.
- Never directly or indirectly offer, promise, receive from or give to any person working for or engaged by Unite Students (including other contractors and suppliers) a financial reward, gift or other such advantage to induce the person to perform, or reward the person for performing, improperly a relevant function or activity.
- Demonstrate policies and reliable systems to prevent a UK and/or foreign tax evasion facilitation offence under sections 45(1) and 46(1) of the Criminal Finances Act 2017 respectively.

- Maintain confidentiality of all information accessed and that it complies with all Data Protection legislation.
- Safeguard the integrity and security of their systems and comply with the relevant government standards and cyber security guidance, informing Unite Students of any incident or activity that affects or has the potential to affect our business or our data
- Have an open, trusted and fair relationship with all suppliers, regardless of their size.
- Demonstrate professional procurement practices with their own supply chain and always ensure integrity, transparency, value and quality in any suppliers that may form part of the Unite Students supply chain. Working in accordance with the terms & conditions that set out any trading relationship and paying due and correct invoices promptly and in line with agreed terms.
- Build an anti-fraud culture that ensures any employee, agent, subsidiary, or other associated person is unable to commit a fraud intending to benefit the organisation – working with Unite Students to openly and transparently provide information that may be requested to investigate possible fraud or review anti-fraud measures.
- Have adequate policies and reliable systems in place to prevent the use of illegally or unethically sourced materials, including conflict materials.
- Minimise both their own and our impact on the environment – following the Unite Students Sustainability Policy (PR)-003) wherever possible in helping us to meet and exceed sustainability targets, assigning responsibility to a Senior Management representative and having appropriate sustainability goals.
- Understand their impact on the micro and macro community – actively promoting corporate social responsibility in line with the principle set out in our Sustainable Procurement Policy (PRO-003)

## 1.2 In relation to Human Rights & Labour Standards:

- Comply with all applicable labour laws and regulations including the UK Modern Slavery Act 2015.
- Pay at least the national minimum wage (National Living Wage within the UK) to their workers, and do not deduct any employment expenses from wages (including uniform, transportation and accommodation). Unite Students is a Real Living Wage employer accredited by the Living Wage Foundation - preference will always be shown by Unite Students to suppliers signed up to the Living Wage Foundation, and we are committed to ensuring our Suppliers adopt its principles of paying no less than the Real Living Wage to all their workers and contractors when working for Unite Students.
- Have policies in place that ensure no worker below the minimum legal age of employment is used. Where Suppliers legally use workers under 18 years of age, they

must have policies that prioritise and demonstrate the best interests of education, safety, quality working conditions and personal development for under 18s. Suppliers must always inform Unite Students of workers under 18 years of age working on a Unite Students property at least 24 hours in advance of their attendance, clearly explaining the specific working conditions and safeguarding in place for such individuals.

- Implement policy ensuring they comply with local laws regarding working hours and overtime, demonstrating that they make efforts to reduce excessive working hours and promote good work-life balance.
- Have checked all workers' right to work in the UK. Your workers may be required to present identification when working or staying at one of our properties.
- Ensure all workers are provided with contracts of employment in writing as required by applicable laws, in a language understood by them and that is agreed and signed by both employer and worker.
- Ensure workers are treated with respect and dignity and are not subject to inhumane or harsh treatment, psychological, verbal, sexual or physical harassment or any other form of harassment, bullying, abuse, threat, or intimidation, during their regular employment or as a result of disciplinary procedures.
- Records and maintains any and all disciplinary proceedings, and where disciplinary action does not include wage deductions.
- Provides a healthy and safe working environment and ensures workers are given appropriate training to carry out their required role in a safe and productive manner.
- Do not use, in any form or at any time, forced, indentured or compulsory labour, or require monetary deposits from workers in order to start or continue their employment, ensuring the work relationship between employer and worker is freely chosen and free from threats.
- Ensure that workers should have the right to have time off, and to leave employment of their own will after reasonable notice has been served.
- Must allow workers freedom of association. If the law restricts freedom of association and collective bargaining, then employers should facilitate alternative means of representation for staff.
- Ensure workers always have access to passports and personal documentation, without restriction and never improperly retain workers' identification documentation.
- Ensure workers have freedom of movement within working hours, unless there are legitimate security or health and safety reasons that threaten the safety or the wellbeing of the worker.
- Use recruiters that uphold and respect the standards contained in this Policy.

- Use temporary labour arrangements solely for the purpose of avoiding obligations to the worker under labour or social security laws and regulations arising from the regular employment relationship.
- Use misleading or fraudulent practices during the recruitment of workers or offering of employment, such as failing to disclose or misrepresenting key terms and conditions of employment, including wages and benefits, the location of work, the living conditions, housing and associated costs, and any significant cost to be charged to the worker, and if applicable, the hazardous nature of the work.
- Implement a proactive approach to tackling modern slavery and labour exploitation and work to eliminate these practices in our wider supply chain, responding promptly and honestly when asked by Unite Students to participate in our Modern Slavery assessment and working to resolve any improvement actions identified as the highest priority.

### 1.3 In relation to Health & Safety:

- operate safely, always meet and maintain health & safety laws, regulations and industry requirements.
- provide appropriate Health & Safety training, procedures, facilities, and protective equipment to workers so that they can undertake their role safely.
- provide a workplace that has suitable temperature, ventilation, lighting, and washing and sanitation areas appropriate for both genders.
- demonstrate consideration to physical and mental health and well-being.
- ensure the requirements of our Health & Safety standards are reflected within their supply chain – ensuring they are achieved, managed and reported effectively.
- where accommodation / housing is provided they must be safe, sanitary and meet the basic needs of the workers with regard to space, temperature, lighting, ventilation, food, water, privacy, affordability, and they must meet or exceed host country housing standards. Accommodation costs must never be deducted from any worker's salary by the employer.
- establish and maintain a management program that drives continual improvement in Health & Safety performance and transparent reporting.
- always fully familiarise and follow the local site sign- in, and other safety processes and / or policies whilst working across the Unite portfolio or on whilst on any of our construction sites
- work with, and provide reports to, our Health & Safety team and/or advisors as required or requested.

Where Suppliers work on Unite Students premises, or on behalf of Unite Students, they must confirm that they

understand and will adhere to their health & safety obligations and Unite Students Health & Safety policy for the duration of the services and/or contract. Suppliers must also be accredited under the CHAS accreditation scheme (or an agreed equivalent).

### 1.4 In relation to Diversity, Equity, Inclusion and Belonging

Demonstrate the actions they undertake to ensure Diversity, Equity and Inclusion and Belonging in the workplace, specifically:

- Employ workers on the basis of their ability to perform the job, not discriminating on any basis or status protected by applicable law.
- Educating their workers on the advantages of having a diverse workforce.
- Can demonstrate action plans on the activity taken to ensure an inclusive and diverse working environment during any given year.
- Showing zero tolerance of unlawful discrimination of any kind and implementing approaches to ensure hidden discrimination does not take place in hiring, compensation, access to training, promotion, and termination of employment or retirement.
- Actively working towards positive social impact, including supporting marginalised communities within recruitment activities.

### 3.0 Key Outcomes

Adherence to this Supplier Code, both internally and by our Suppliers, will ensure Unite Students' activities and those of our supply chain have the least possible environmental and social enabling our commitment of being a responsible business.

### 4.0 Non-Compliance

Unite Students reserves the right to assess and monitor suppliers' compliance with this Supplier Code, whether or not audit rights are contained within relevant supply chain contracts.

Non-compliance with the intent and any conditions set out within this policy will be subject to enquiry.

### 5.0 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 #	2.0	Status	Live
Classification		Public (everyone has access)	
Reason for development		Minimum standard to which all suppliers should comply	
Summary of changes		Annual review and alignment to revised Sustainable Procurement Policy 2.0	
Applicable parties		Colleagues and suppliers	
Author(s) (name / title)		Lisa Simpson, Senior Supplier Relationship Manager	
Owner (name / title)		Eleanor Biddiscombe, Procurement Director	
Function		Procurement	
Approved by (name/ title)		Eleanor Biddiscombe, Procurement Director	
Date Approved		31/07/2025	
Review date		31/07/2026	
Location		Supplier Zone ( <a href="https://www.unitegroup.com/our-suppliers">https://www.unitegroup.com/our-suppliers</a> )	
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 checked="" 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
2.0	04/08/25	Lisa Simpson/Eleanor Biddiscombe	Annual Review including updates to Ethical sourcing/human rights (including the movement of those found only in the PR003 Sustainable Procurement policy to avoid inconsistencies)