

Our Modern Slavery Statement for the year ended 31 December 2024

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 2024. 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.

1. Our business and supply chain

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 see [Who we are | Unite Group](#).

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. Our business model is underpinned by providing safe and secure accommodation for students, a healthy bed pipeline for university partners, and a passionate and committed workforce together with sustained returns to our shareholders. To read more, see [How we operate | Unite Group](#).

Our people

As of 31 December 2024, the Unite Group had 2,050 employees. These employees provide office-based support and operate our 153 properties across the UK, providing homes to over 68,000 students.

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 £12.60 outside London and £13.85 in London. The Government's current national living wage is £12.21.

Our people are employed on permanent or fixed term contracts. Through our onboarding process, all employees receive an offer letter and contract setting out the terms and conditions of their employment. We complete necessary ID checks and request evidence of the right to work in the UK. Depending on job role, additional checks may also be carried out prior to the offer of employment.

Any engagement for temporary labour at our properties is covered by the Agency Worker Regulations where applicable. The "employer pays principle" is also taken into account for our supply chain services such as cleaning and security, to ensure that costs of the operation such as uniform/accommodation are not deducted from wages.

Our supply chain

We regularly map the extent of our operations and supply chain, which are predominately UK based. Approximately 96% of our Tier 1 supply chain comprises 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). The balance of our Tier 1 supply chain (approximately 4%) comprises products/services procured from outside the UK (predominately Ireland and the US). These products/services include wood (for joinery), software/software development services and Mechanical & Engineering parts (for example for lifts). We continue to map the extent of our beyond Tier 1 supply chain which is primarily UK based, comprising real estate and broader property management related goods and services.

2. Governance

Our policies and procedures are overseen by the Chief Executive Officer and Executive Committee, with input from various functions across the business including Company Secretarial, Legal, People, Procurement, Risk and Sustainability. Our policies are reviewed on an annual basis and when there are changes in relevant legislation. The implementation of these policies is overseen by Business Function leaders. The Board is informed about modern slavery risks and performance and is tasked with oversight of our modern slavery policies.

3. Our policies in relation to Modern Slavery

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 and can be found here: [Policies & documentation | Unite Group](#). We also have a dedicated Supplier Zone page: [Our Suppliers | Unite Students](#).

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](#).

Anti-Bribery Policy - sets out our commitment to zero tolerance of bribery and corruption through our Anti-Bribery programme.

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 Whistleblowing Policy - encourages our people and suppliers to raise concerns in confidence and provides protection for qualifying disclosures.

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. It also requires that our suppliers 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 assessments.

Supplier Code of Conduct - sets out our expectation of supplier conduct in accordance with the highest standards of business and personal ethics, including each supplier's commitment to preventing modern slavery and demonstrate their commitment to this. This Code also requires our suppliers to uphold these standards throughout their sub-contractors and supply chain. All suppliers are made aware of this Code and are required to agree to it. It is also a requirement that this Code applies equally to our supplier's own suppliers.

4. Supply chain due diligence

Being a sustainable and responsible business extends to how we work with our suppliers and managing our supply chain.

Our prospective suppliers' compliance with Modern Slavery legislation – as well as broader sustainability and responsibility – plays a key part of the due diligence undertaken at both our competitive tender stage (for preferred suppliers) and our onboarding stages (for any supplier) to ensure compliance. During 2024 we introduced a mandatory policy that requires all suppliers to agree to our Supplier Code and complete our modern slavery vetting, enabling us to address any concerns or training needed within our supply chain.

In support of this, we have a [Sustainable Procurement Policy](#), backed up with a [Supplier Code of Conduct](#), 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 together closely to achieve this.

Non-compliance with any conditions set out within our Sustainable Procurement Policy, will be subject to enquiry. Depending on the severity of the breach, we may offer suppliers the opportunity to rectify any issues and formulate a remediation plan. We also have procedures in place relating to exit strategies for underperforming suppliers, to mitigate and minimise operational risks.

5. 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 in our direct operations and 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.

We have assessed temporary labour for activities such as maintenance and cleaning at our properties across the UK as higher risk for modern slavery purposes and to mitigate this risk we source temporary labour through a third-party 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.

Our property development, renovation and property services contractors (and their sub-contractors) are verified by the CHAS standard (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 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 launched an enhanced assessment of the sub tiers within our supply chain that will be completed during 2025.

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. At the start of each year, the Procurement team review the risk rating of all suppliers used by the business and re-categorise them as necessary. The level of risk and spend will determine the review frequency for each supplier. From this risk assessment, any supplier categorised as our highest risk (or highest spend) will be subject to quarterly objective performance reviews. These reviews help to inform our risk assessments and ongoing monitoring for continued improvement.

Since our last statement, our Procurement team have reviewed and vetted over 80% of our operational spend, with ongoing monitoring of feedback and controls.

6. 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.

Our operational teams are on the ground, present at our properties 24 hours a day throughout the year. This means they are best placed to detect and required to alert any signs of modern slavery, including any suppliers providing services such as cleaning or other property related services.

We closely manage the performance of our operational supply chain and their 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.

7. Modern Slavery incidents

In the financial year ended 31 December 2024:

1. no whistleblowing concerns or incidents of modern slavery were identified or flagged for concern in our business or supply chain; and
2. no violations of human rights under the UN Guiding Principles on Business Human Rights were found.

8. Training on Modern Slavery

As part of our corporate induction, all new joiners are required to complete mandatory training which includes our Code of Ethics and Whistleblowing policy. This training is repeated on an annual basis. We also provide our people with extensive training across a wide range of topics with a focus on working conditions including; health & safety, security, fire safety, diversity, equity, inclusion, belonging and wellbeing.

In 2025 we are launching mandatory training for all employees on modern slavery such that we have eyes and ears on the ground, in particular during peak summer periods. The training includes information on how to spot the signs that may give rise to a concern and how to report a concern. This training is intended to supplement the ongoing work of the Procurement team, widening our ability to be diligent across the business and supply chain.

In addition to training, we engage with our employees through various channels including regular employee surveys and "Unite Live" sessions with our Chief Executive Officer 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.

9. Progress and next steps

During 2024, our supply chain modern slavery risk assessments identified a small number of suppliers requiring training on modern slavery. Although these suppliers were companies with a turnover below the threshold reporting requirements under Section 54 of the Modern Slavery Act 2015, training was required to meet our expected standards. In addition, one prospective new supplier was rejected due to poor quality responses to their modern slavery standards.

To support the continued monitoring of our progress and the effectiveness of our policies and procedures relating to modern slavery, we have introduced the following key performance indicators:

Key performance indicators (KPI)	FY24	FY25 YTD	FY26	Change
Supplier Code acceptance by all new suppliers when onboarded	71% (Target: 80%)	100% (Target: 90%)	Target: 100%	
All new suppliers vetted for modern slavery risks when onboarded	76% (Target: 80%)	100% (Target: 90%)	Target: 100%	

% represents the percentage of suppliers by number

During 2025 we are also reviewing our Tier 1 suppliers to determine whether they have an active and vetted supplier code or equivalent. This will be included as a key performance indicator in our next statement.

Looking ahead, we will continue to promote collaborative, sustainable and responsible business relationships with our supply chain partners and monitor our progress annually.

10. Approval

Having regard to the nature of our business as a UK-based property business, our modern slavery risk assessment and the activities described within this statement, we are confident that our approach to tackling modern slavery is appropriately targeted.

This statement was approved by the Board on 15 May 2025.



Joe Lister
Chief Executive Officer