

## Unite Group plc

### Anti-Slavery and Human Trafficking Statement

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the financial year ended 31 December 2016.*

#### Who we are

Unite Group plc is a FTSE250 business registered in England and Wales. We are an owner and operator of purpose built student accommodation across the UK, with our head office in Bristol. 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 make us their choice for home while at University. To read more, see [Unite Students - Responsible business](#).

#### Our people

Unite Students has 1450 employees (as of 31 December 2016) all of whom are UK based (except for 8 in our China marketing office in Beijing and 3 in Cyprus). These employees operate our 140 properties across the UK, providing homes to over 49,000 students.

We have a Code of Conduct on Employment Practices which (among other things) sets out our commitment to ensure all employment with us is on a voluntary basis. Our Unite Students 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 honestly, with integrity and without discrimination. One way we reinforce this is through our Unite values, which include a commitment for our employees to always **"Do What's Right"**. We provide guidance and training to support employee understanding of our values and actively encourage employees to raise concerns, including through a confidential whistleblowing channel.

Unite Students became the first accredited 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 £8.45 outside London and £9.75 in London. This is significantly higher than the Government's national living wage of £7.50. For more information, see [Unite accredited as a Living Wage Employer 2015](#).

### ***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 property preventative and reactive maintenance, property lifecycle works, as well as other technical services related to utilities, health & safety etc.).

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 encourage our suppliers to also adopt and adhere to the Living Wage principles. Our Procurement and HR teams work closely to achieve this.

To help ensure compliance with this policy, we work with our suppliers using the Chartered Institute of Procurement and Supply's (CIPS) Sustainability Index. This focuses on social issues as well as broader sustainability risks, with Modern Slavery captured within the Social pillar. Our prospective suppliers' compliance with social issues - as well as broader sustainability - plays a key part of our competitive tender stage and our approved suppliers go through due diligence to ensure compliance.

Our property development, renovation and property services contractors (and their sub-contractors) are verified by SafeContractor. This involves comprehensive checks including verifying the health and safety working practices of these suppliers.

## **Modern Slavery Risk Assessment**

We consider our most significant risk areas 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 property development and management services. While nearly all our direct suppliers are based in the UK, some of these suppliers source some materials from around the world.

As part of our broader initiative to identify and mitigate risk in our supply chain, we undertook a procurement / supply chain risk assessment during 2016. Following this assessment, during 2017 we:

- improved our supplier management processes by centralising more contracts, focusing on supply chains identified as having a higher risk of slavery and trafficking;
- strengthened our procurement practices to deliver a more standardised approach to (among other things) employment practices monitoring and compliance in our supply chain;
- built long term relationships with UK based suppliers and framework contractors and made clear our expectations of business behaviour; and;
- maintained systems to encourage the reporting of concerns and the protection of whistle blowers in our supply chain.

We continue to review this risk assessment and monitor our activity here as part our broader approach to ensuring we are a responsible and sustainable business.

**Richard Smith**

**Chief Executive**