UNITE STUDENTS SUSTAINABLE PROCUREMENT POLICY

Updated: 24 June 2015

Unite Students is the UK's leading manager and developer of student accommodation. We provide a home for over 45,000 students in 132 purpose built properties across 28 of the UK's strongest university towns and cities. We have over 1,000 employees and work in partnership with more than 60 higher education providers, as well as renting rooms directly to students.

Our culturally-diverse customers are at the heart of our business and we aim to provide a home for students which supports their success, whether defined as academic achievement, personal growth or employability. Our properties provide high quality, well-located, safe accommodation that is close to University campuses, transport and local

We recognise that our operations have environmental, social and economic impacts, and that we have a responsibility to manage and reduce these impacts for the benefit of current and future generations, and to ensure we can continue to fulfil our purpose of creating a Home for Success. One way in which we do this is by ensuring that environmental, social and economic factors form an important part of supplier due diligence, vendor management and supplier selection in a competitive tender process. This Sustainable Procurement Policy sets out our commitment to this process.

Supplier selection and Vendor Management: Unite Students takes its commitment to corporate responsibility and sustainability extremely seriously, and therefore a significant factor in the company's supplier selection procedure, as well as ongoing vendor management, is how closely suppliers' policies are aligned with our own. The company strives to ensure that suppliers' policies and conduct (around areas such as environmental, employment and safety) are congruent with its own policies and approach, regardless of the size of the project, ongoing work or a tender.

In addition to ensuring that suppliers' broader sustainability plays an important part in the competitive tender stage, all suppliers that are set up on our purchasing system will also go through due diligence to ensure adherence to this Sustainable Procurement policy.

Effective vendor management of our key supplier base ensures that the practices and policies of our supply base remain consistent with this policy. Consistent monitoring of our key suppliers allows Unite Students to evaluate their ongoing impact and drive further improvements over the lifetime of their engagement.

Specific Policy Statements: The following areas have been identified as minimum levels for our supply base and whilst efforts will be made to actively improve the impact of our supply base to the environment, each and every one of our supply chain will adhere to the following principles:

Legal Compliance: Suppliers must comply with all relevant local laws and regulations, should act with integrity and high moral and ethical standards at all times, must not participate in any form of corruption or bribery, or be associated with criminal, violent or terrorist groups.

Anti-bribery and Anti-corruption: Unite Students have a zero tolerance policy on bribery or corruption, and all procurement activity will be undertaken in accordance with the highest standards of business and personal ethics in accordance with our Code of Ethics and Anti-bribery Policy.

Fair Pay: As a living wage employer Unite Students require our suppliers to pay at least the minimum wage to their staff; we are also committed to encouraging our suppliers to also adopt and adheres to the Living Wage principles. Our Procurement and HR teams will work closely to achieve this.

Health and Safety: We are committed to ensuring or suppliers operate safely, and our Procurement and Health and Safety teams will work closely with suppliers to ensure they meet legal requirements for health and safety standards. This includes, but is not limited to, mandatory third party accreditation beyond minimum legal requirements for relevant suppliers, currently through the third party *Safecontractor* accreditation scheme. Employers must provide appropriate training and protective equipment to employees so that they can undertake their role safely.

Child Labour: We will require our suppliers to have policies in place to confirm that no employee below the minimum legal age of employment are used and, where an employee is under the age of 18, that the policies prioritise the best interests of personal development.

Working Hours: We require our suppliers to implement policy ensuring they comply with local laws regarding working hours and overtime, and that they make efforts to reduce excessive working hours.

Training: Employees should be given appropriate training to carry out their required role in a safe and productive manner.

Discipline: Employees should not be subject to inhumane or harsh treatment during their regular employment or as a result of disciplinary procedures. Records of any disciplinary proceedings should be maintained and penalties should not include wage deductions.

Terms of Employment: In addition to this, it is Unite Students policy that none of our supply base utilise forced or compulsory labour or require monetary deposits from employees in order to start or continue their employment. Employees should have the right to leave of their own will after reasonable notice has been served. Terms of employment should be communicated to employees clearly in an easily understandable contract, agreed and signed by both employer and employee.

Equal Opportunities: No discrimination of any kind will be tolerated in our supply chain whether this be racial, sexual, age or any other kind of discrimination of prejudice.

Freedom of association: Our supply base must allow employees freedom of association. If the law restricts freedom of association and collective bargaining, then employers should facilitate alternative means of representation for staff.

Impact on the Environment: Our Procurement and Energy and Environment teams will work closely with suppliers to help reduce the negative environmental impact of our supply base, especially in relation to energy use, GHG emissions, water use, waste and recycling, resource use, biodiversity and pollution. This will be actively monitored via our Vendor

Management programme. Not only will this be monitored in our supply chain and form part of supplier selection, but we are committed to pro-actively seeking out and delivering projects that actively reduce our own negative impact on the environment.

This policy will be implemented via our procurement and operational policies and procedures.

This document is reviewed annually and communicated to appropriate stakeholders. All staff, suppliers and contractors are expected to comply with this policy and support its implementation.

Mark Allan, Chief Executive Officer 24 June 2015