

Modern Slavery and Human Trafficking Statement 2022/23

Introduction

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that UPP REIT Holdings Limited, and our subsidiaries (“UPP” or “Company”) take to ensure that modern slavery or human trafficking is not taking place within any part of our business or supply chain.

We are committed to ensuring that slavery, trafficking, bonded labour, forced or servile marriage, descent-based slavery and domestic work and slavery does not take place in our business or any part of our supply chain by seeking to:

1. Ensure our recruitment processes are transparent and reviewed regularly, with robust processes in place for the vetting of the appointment of our people;
2. Raise awareness of the issue amongst our people and our suppliers to combat the hidden nature of modern slavery;
3. Challenge and support our suppliers in the effort to drive out modern slavery and human trafficking

Our Business

UPP is the leading provider of on-campus residential and academic infrastructure services to universities in the United Kingdom. The UPP Group has more than 35,000 student bedrooms with 15 university partners and is organised into three regions – northern, central, south with a Head Office in the City of London. The business of the Company is the design, financing, development, and operation of these assets over long-term concession periods – typically between 40-50 years. In the normal course of its business, the Company procures services from a wide range of suppliers, most notably providers of construction services, architects, mechanical and electrical engineering services, and sub-contractors supporting the delivery of facility management services.

The Company is responsible for ensuring that they can demonstrate compliance with the Modern Slavery Act by working to our Group policies and procedures.

Policies in relation to slavery and human trafficking

UPP adheres to a comprehensive suite of policies and standards which ensure the business is conducted in an ethical and transparent manner. These include:

1. Modern Slavery and Human Trafficking Policy Anti-slavery policy - This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment - We operate a robust recruitment policy and onboarding process, including conducting eligibility to work in the United Kingdom checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Anti-bribery and Anti- money laundering policies set out the approach taken to countering bribery and identifying money laundering in accordance with current legislation, and how employees should report instances.
4. Health and Safety – Safety, Health and Wellbeing is extremely important at UPP and we have several policies which set out our approach to ensuring we provide a safe and healthy working environment for our employees and contractors
5. Code of business ethics - This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers and due diligence processes

UPP operates a procurement policy and maintains a preferred supplier list. We conduct due diligence on all potential suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery. We make it clear that we do not work with supply chain partners who do not take modern slavery seriously.

We require all contractors to operate a Contractors Health and Safety Assessment Scheme (“CHAS”), which is checked annually.

As part of our continuous improvement to uphold our approach to modern slavery, we are also taking the following steps.

1. An annual review of all Tier 1 and 2 suppliers’ approach to and disclosure on business practices in relation to modern slavery and CHAS accreditation for contractors to ensure we can continue working with the supplier.
2. Notifying all suppliers of our expectations in relation to their approach to modern slavery.
3. An update of suppliers’ terms and conditions to enable UPP to request suppliers to confirm what steps they have taken to eradicate modern slavery and be able to terminate their contract at any time should they be linked with any instances of modern slavery.
4. Seek assurances that suppliers hold their own suppliers to account over modern slavery.
5. Seek assurances that suppliers pay their employees at least the national living wage.
6. Include appropriate review measures in our due diligence processes for sourcing significant suppliers and subcontractors on a risk assessed basis.

Risk assessment and risk management

We know that key activities, such as the procurement of materials, and the use of subcontractors and labour agencies, creates potential risk of modern slavery taking place on our sites and within our supply chain. The below table identifies the four areas of risk pertaining to our business.

Material Suppliers	Production in, or using suppliers from, high risk countries for modern slavery and where the enforcement of labour laws is poor, without having good systems and processes to prevent exploitation occurring.
Labour Agencies	Risk of labour agencies exploiting workers through modern slavery including short term temporary labour for summer cleaning
Subcontractors	<p>Risk of subcontractors not completing worker checks. Subcontractors use their own subcontractors to complete certain packages of work, creating additional tiers and complexity.</p> <p>Length of time that subcontractors are on site results in different workers on site over the lifespan of the project. This makes it hard to track where workers are from, who employs them and any potential indicators of modern slavery.</p> <p>Subcontractors frequently purchase materials on our behalf. As a result, we have little oversight of who these suppliers are, where they are sourcing from and what their working practices are.</p>
Emerging Risks	<p>Risk that normal supply options may be impacted, potentially prompting the use of lesser-known suppliers, in potentially high-risk countries with reduced visibility and more uncertainty.</p> <p>Subcontractors, where exposed to increased prices, may look to recover value from lower cost supply options with less diligent employment and sourcing practices.</p>

As part of our compliance processes, we assess our supply chain for potential areas of increased risk of non-compliance. Where areas are identified, we carry out an audit, which will include a focus on compliance with employment as well as other regulatory and sustainability criteria.

UPP recognises that good governance is essential for driving out modern slavery in our business and on our sites, and that senior-level ownership and engagement on the issue of modern slavery is critical. The Board has established procedures to manage risk and oversee the internal control framework. It undertakes full and regular assessments of the Company’s emerging and principal risks and ensures effective risk management and internal control systems are in place to prevent occurrence or mitigate impacts.

Whistleblowing

We encourage our people, customers and suppliers to report any concerns about unlawful or inappropriate conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain. This enables concerns to be reported without fear of retaliation in the knowledge that we do not tolerate harassment, victimisation or reprisals against anyone raising a concern in good faith.

Our whistleblowing procedures are designed to ensure any matter raised will be investigated thoroughly, promptly and confidentially and are reported annually to UPP's Audit and Risk Committee.

Training on slavery and human trafficking

There are parts of our business where an in-depth knowledge of Modern Slavery issues is required, for example our Procurement and HR teams and construction site managers. We have therefore developed training that meets the needs of the various employees within these risk areas of our business to ensure they understand the signs of modern slavery and what to do if they suspect that it is taking place within our business or supply chain.

Our commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes UPP REIT Holdings Limited's slavery and human trafficking statement for the financial year ending 31 August 2023 as approved by the Board of Directors.

A handwritten signature in black ink that reads 'Elaine Hewitt'. The signature is written in a cursive style with a large, stylized 'E' at the beginning.

Elaine Hewitt

Chief Executive Officer

Date: 17 January 2024