

# Modern slavery statement for financial year 2016/17

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that UPP Group Holdings Limited (“UPP”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. UGHL has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

## Our business

UPP is the leading provider of on-campus residential and academic infrastructure services to universities in the UK. 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. The Group have more than 32,000 student bedrooms with 15 university partners and is organised on the basis of four regions – northern, central, south and south west. The company has a head office in the City of London. 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.

## Our high risk areas

In terms of understanding our greatest risk, there is the possibility that in service industries, particularly construction and procurements of goods not for resale, there could be potential for workers to be put at risk of forced labour. We have undertaken a review of our policies and our supply chain and introduced a training programme to mitigate the risk.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 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
- Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will
- Whistleblowing Policy. 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, without fear of reprisals
- 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

UPP operates a procurement policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business;
- They hold their own suppliers to account over modern slavery;
- They pay their employees at least the national minimum wage / national living wage (as appropriate); and
- We may terminate the contract at any time should any instances of modern slavery come to light

## Training

We regularly conduct training for our procurement and construction teams so that 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 performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## Approval for this statement

This statement was approved by the Board of Directors on Friday 10 March 2017 and signed by:



### R Bienfait

Director of UPP Group Holdings Limited  
14 December 2017