

Anti-Bribery Policy 2021



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1. Introduction

1.1 Purpose

The Unite Group plc (the “Company” or the “Group”) is committed to zero tolerance of bribery and corruption.

1.2 Scope

This policy extends to all the Group’s dealings and transactions in which it or its subsidiaries and associates operate. This policy is given force by the procedures set out below, which will be regularly reviewed and, as appropriate, revised. All directors and employees of the Group are required to comply with this policy as it applies to them.

1.3 Responsibilities

The Chief Executive shall have overall responsibility for the Group’s Anti-Bribery programme and the Company Secretary shall have responsibility for implementation of the programme.

1.4 Definitions

- 1.4.1 Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or otherwise improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 1.4.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 1.4.3 Corruption is the abuse of entrusted power or position for private gain.
- 1.4.4 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or the Company Secretary or Assistant Company Secretary.



2. Principles

- a) The Group has a Code of Ethics (set out below) that emphasises its zero tolerance of bribery and the Group's commitment to conducting its business in accordance with the highest standards of business and personal ethics.
- b) All employees will be made aware (through relevant means of communication) of the Group's Anti-Bribery Policy as they affect them. This will form part of the Group's induction process and employees will be required to confirm in writing that they have read and understood the policy.
- c) Risk assessments in relation to the risk of bribery in the Group's Business Units and relevant support functions will be undertaken as is necessary, with the results of these assessments and reviews reported to the Board. As required, existing policies or procedures will be revised, or new policies and procedures adopted, to mitigate the risk of bribery occurring within the Group.
- d) Appropriate due diligence will be undertaken in relation to suppliers, contractors and consultants proposed to appointed by the Group in relation to contracts above specified levels. All such suppliers, contractors and consultants will be required to have anti-bribery policies of their own which are at least as rigorous as those of the Group.
- e) This policy covers the offer or receipt of gifts, hospitality or expenses to ensure that any legitimate expenditure is transparent and recorded and does not improperly affect the outcome of any business decision or transaction.
- f) This policy will be reviewed by the Board and, when considered necessary, appropriate changes to the policy will be implemented.



3. Gifts and Hospitality

3.1 As part of the Anti-Bribery Policy, the Group maintains a gifts and hospitality register in which directors and employees are required to record gifts or hospitality (above specified levels) received or given in connection with the business of the Group as follows:

Notification - gifts / hospitality in excess of £250: Directors and employees of Unite are required to notify the Company Secretary and / or the Assistant Company Secretary of any:

- personal or corporate gift to a value in excess of £250 per person; and
- hospitality to a value in excess of £250 per person;

offered or given to or received by any person who has or may have influence over the business of Unite; and

Approval - gifts / hospitality in excess of £500: in addition to notifying as above, Directors and employees of Unite are not permitted to offer, give or receive any personal or corporate gift or hospitality to a value in excess of £500 per person without first obtaining the prior written consent of any of the following: Chief Executive, Chief Financial Officer, Chief Customer Officer or Group Property Director (or equivalent positions).

In the case of gifts or hospitality in excess of £500 to or by Executive Directors of Unite (other than the Chief Executive), the prior written consent must be obtained from the Chief Executive. In the case of gifts or hospitality to or by the Chief Executive, the prior written consent must be obtained from the Chair of Unite.

3.2 Directors and employees of Unite are not permitted, directly or indirectly, to make an offer of, or make a donation to any political, charitable or not for profit organisation in the course of their employment as a way of obtaining an advantage in a business transaction.

3.3 Any legitimate expenditure should reflect a desire to cement good relations and show appreciation. Such expenditure should seek to improve the image of Unite as a commercial organisation; to better present its products and services; or establish cordial relations, without the recipient being under the impression that they are under an obligation to confer any business advantage or that the recipient's independence will be affected.

4. Raising a Concern

- 4.1 The Group maintains an independent “whistle blowing” channel, through which employees may report (anonymously, if they wish), any concerns they may have regarding suspected illegal or improper conduct, including, but not limited to, bribery.
- 4.2 Employees are encouraged to raise concerns about any issue, including any suspicions of bribery or corruption, at the earliest possible stage.

5. Sanctions

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 Bribery is a criminal offence. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery, we can face an unlimited fine and damage to our reputation. We therefore take our legal responsibilities very seriously.



Appendix A - Code of Ethics

The Unite Group plc (the “**Company**”) and each of its subsidiary and associated companies (together “**Unite Students**”) seeks at all times to conduct its business in accordance with, and to ensure that each of its employees and directors adheres to, the highest standards of business and personal ethics. In particular, it is required that each employee of Unite Students must:

- exercise honesty, integrity and non-discrimination;
- not enter into any activity which may result in a conflict of interest with Unite Students;
- not accept or give anything of value which could be construed as a bribe or an inducement;
- not disclose to others or use for personal gain any confidential information relating to Unite Students; and
- report any suspected fraudulent, corrupt or illegal activity.

Honesty, Integrity and Non-Discrimination

All employees must practice honesty and integrity in every aspect of their dealings with other Unite Students employees, the public, the business community, shareholders, customers, suppliers and government authorities. Unlawful discrimination against employees, shareholders, directors, officers, customers or suppliers on account of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation is prohibited. All employees must treat persons with whom they come into contact with dignity and respect.

Conflicts of Interest

Company policy prohibits certain conflicts between the interests of its employees and those of Unite Students. It is not possible to provide a complete definition of what constitutes a prohibited conflict of interest. There are, however, certain situations that will always be considered a prohibited conflict of interest. Examples of these are when an employee (or any person having a close personal relationship with an employee):

- obtains a significant financial or other beneficial interest in one of Unite Students’ suppliers, customers or competitors without first notifying the Company and obtaining written approval from the Board;
- engages in a significant personal business transaction involving Unite Students for profit or gain, unless such transaction has first been approved in writing by the Board; or
- learns of a business opportunity through association with Unite Students and invests in that opportunity without first offering it to the Company.

Any employee aware of any actual or potential conflict of interest must disclose the same to the Company. Each situation will be considered on an individual basis and the mere fact of disclosure will not necessarily mean that the situation will be considered substantial enough to be prohibited.