

# Modern Slavery Statement

CLV UK Holdings Limited

## **Who are we:**

Campus Living Villages (CLV) is an owner, developer and operator of student accommodation currently managing over 10,584 beds in the United Kingdom. CLV is committed to improving its practices to combat slavery and human trafficking.

The CLV group extends globally, with offices and beds in the United Kingdom, Australia and the United States. The group has over 435 employees, with 182 of those employed in the UK business.

The CLV UK Group has an annual turnover of £47.2 million.

## **Our business:**

As a specialist in student accommodation, CLV has established itself as a leading provider of quality facilities and exciting student communities. CLV launched in the UK in 2008 and has student villages in 9 locations, comprised of 51 buildings including Bournemouth, Leeds, Newport, Manchester, Liverpool, and multiple London sites.

## **Our supply chains:**

CLV UK's supply chains include construction contractors and facilities management services to maintain sites, cleaning, and linen services, as well as procuring goods such as furniture and whitegoods. The majority of CLV's supply chain are UK based.

## **Our policies on slavery and human trafficking:**

CLV UK has committed to business practices to protect workers and has taken steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery procedures detailed in this statement reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **Due diligence processes for slavery and human trafficking:**

Within CLV UK's business there are processes in place to ensure that workers are not exploited and are protected from poor labour practices.

As part of our initiative to identify and mitigate risk we have taken steps to eradicate any slavery or human trafficking from our supply chain, with most of CLV UK's procurement being performed centrally by a procurement team. This approach ensures consistency with our procurement methods and principles.



CLV UK's risk analysis covers numerous risk indicators including checking the nature of services / products; source of services / products originating from a 'high-risk country', and whether the supplier operates under a 'high-risk' business model.

It is followed up with a two-stage Modern Slavery Questionnaire process, an approach which further scrutinises a supplier's compliance with Modern Slavery best practices. The Phase 1 Questionnaire is a requirement for all suppliers being onboarded, should these initial responses highlight potential concerns, the Phase 2 Questionnaire will be used – which includes a more specific series of questions, focusing on the intricacies of the supplier's practices relating to Modern Slavery compliance.

Amongst other items, the questionnaire includes requests for additional information, specifically surrounding the supplier's own Modern Slavery policy, Modern Slavery statement (if applicable) and further details that may be relevant to the supplier in question.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers – a portal provided by Convercent allows anonymous reporting.

#### **Supplier adherence to our values and ethics:**

We have zero tolerance to slavery and human trafficking. We have in place a supply chain compliance programme to ensure all those in our supply chain comply with our values. As part of the procurement process, all potential suppliers are required to complete at least the Phase 1 Questionnaire as set out above, answering questions that are targeted towards checking and encouraging a supplier's compliance with the Modern Slavery Act 2015 ("Act").

CLV UK does not engage suppliers who do not comply with the Act.

We also include, where possible, contractual terms in our agreements with suppliers imposing ongoing obligations on the supplier to comply with the Act and to notify CLV UK if the supplier becomes aware of any circumstances within its own supply chain that could constitute an offence under the Act.

#### **Training:**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are committed to ongoing staff training. A training program was implemented in the 2020/2021 financial year. At the time of writing, 95.08% of UK staff members have completed this training. This is a mandatory training requirement on joining CLV, forming part of the induction training for all new staff and must be completed within three months of commencing employment.

#### **A unified approach:**



CLV UK operates in conjunction with CLV Australia and CLV US, providing quality accommodation to the global student population. While only the UK and Australia have active Modern Slavery legislation, we have committed to identifying, actioning, and monitoring risks across all regions and supply chains.

In 2022 the CLV group formalised its ESG framework and a plan to achieve Carbon Neutral (Scopes 1 and 2) emissions in our operations by 2030, and Net Zero (all scopes) by 2050. This includes a dedicated team based in Australia, and a recently assembled project team tasked with envisaging and actioning numerous practical methods to achieve these targets. The framework articulates six focus areas most material to the organisation and to our stakeholders and two of those focus areas - maintaining a purposeful and equitable value chain and being a trusted operator refer to modern slavery. The CLV Board has ultimate accountability for ESG with updates provided quarterly at the Committee of Audit, Tax, Sustainability, Risk and Compliance.

#### **Further steps:**

A key goal for CLV since 2020/2021 was to roll out Modern Slavery training and then maintain this training each year. Given natural occurring changes in employees, this requires continuous monitoring and improvement. This continues to be successfully rolled out with 95.08% of UK staff having completed this training so far. This approach helps to provide an understanding of this important issue from the outset, as well as to work with the wider CLV group to combat slavery and human trafficking.

Actions going forward for 2024/2025 include continuing efforts towards a full sweep of every CLV UK supplier by our Procurement Team. So that all previous suppliers of CLV UK, regardless of risk-level, are put through the Modern Slavery Questionnaire process, including a strategic annual review of any 'higher risk' suppliers for Modern Slavery compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30<sup>th</sup> June 2024. It was approved by the board on 13 December 2024.

**Lee McLean** (*Director*)

**CLV UK Holdings Limited**

Signed:

Date: 13 December 2024