

# Modern Slavery Statement

CLV UK Holdings Limited

## Who are we:

Campus Living Villages UK Holdings Limited (CLV UK) is an owner, developer and operator of student accommodation currently managing over 10,310 beds in the United Kingdom. CLV UK is part of the Campus Living Villages (CLV) group of companies which is headquartered in Sydney, Australia, has support offices in the United Kingdom and the United States and operates student accommodation in the United Kingdom, Australia and the United States. CLV has over 425 employees, with 188 of those employed in the CLV UK business. These employees provide office based support and operate our student villages. To read more, please see [About - Campus Living Villages](#).

For the reporting period covered by this statement, CLV UK had an annual turnover of £48.3 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, including Bournemouth, Leeds, Newport, Manchester, Liverpool, and multiple London sites, comprised of 51 buildings.

## 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:

CLV is committed to conducting our business in a way that respects the human rights of our people, business partners, customers and the communities in which we operate. In line with the [United Nation's Guiding Principles on Business and Human Rights](#) (UNGPs), CLV recognises its responsibility as a business to respect and uphold internationally recognised human rights, including those set out in the [International Bill of Human Rights](#) and the [International Labour Organisation's Declaration on Fundamental Principles and Rights to Work](#).

In FY25 the CLV Board approved a new [Human Rights Position Statement](#) which sets out our commitments to:

- Human Rights due diligence to identify, prevent, mitigate and account for our human rights risks and impacts
- Building capability and awareness of human rights issues within our organisation and supply chains



- Providing and participating in relevant grievance mechanisms and being committed to participating in remediation

Other company policies that support our approach to managing modern slavery risk include our Values and our Code of Conduct, our Respect in the Workplace Policy, Diversity and Inclusion Policy, Fair and Transparent Business Practices Policy, Compliance Policy, Risk Management Policy and robust channels and processes for lodging and investigation of grievances such as CLV's Whistleblowing Policy, our 'Speak Out' Helpline and our regional Grievance Policies and Investigation Procedures.

CLV has been a participant in the United Nations Global Compact since January 2025, and will report on human rights, labour, environment and anti-corruption against the Ten Principles of the Compact in our annual Communication on Progress and/or our annual Sustainability Report.

### **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.

Most of CLV UK's procurement is performed centrally by a procurement team. This approach helps ensure 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, 94% 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.

Our Group ESG 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 by our Group ESG Executive who is responsible for managing our approach and implementation of our approach to managing human rights risks across the Group, including the continuous improvement of reporting practices, risk management, actions and effectiveness measures.

### **Further steps:**

Actions for 2025/2026 include:

- Continuing efforts to engage with CLV UK suppliers 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.
- Updating our online training module in relation to managing human rights risks, including modern slavery, in and associated with our business.
- Working with Fair Supply to improve the existing and new supplier due diligence process, specifically in relation to modern slavery risk.



- Completing and implementing a new Supplier Code of Conduct to support CLV's Human Rights Position Statement.

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 2025. It was approved by the board on 3 September 2025.

**Lee McLean** (*Director*)

**CLV UK Holdings Limited**

Signed:

Date: 3 September 2025