



Modern Slavery Statement

CLV UK Holdings Limited

Our Structure, operations and supply chain:

Campus Living Villages UK Holdings Limited (CLV UK) is an owner, developer and operator of student accommodation currently managing over 11,488 beds across 13 locations in the UK, including Bournemouth, St Andrews, Luton, Leeds, Newport, Nottingham, Salford, Manchester, Liverpool, and multiple London sites., comprised of 51 buildings.

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 Group has over 435 employees, with 182 of those employed in the CLV UK business. To read more, please see [About - Campus Living Villages](#).

For the reporting period covered by this statement, CLV UK had an annual turnover of £47.2 million.

CLV UK has a diverse, upstream supply chain with around 400 Tier 1 suppliers engaged annually. Tier 1 suppliers are defined as those who invoice CLV UK directly for goods and services. Our upstream value chain includes:

- sourcing goods such as furniture, linen, appliances, uniforms, fixtures and electronic equipment for our villages.

- contracting utilities, construction, cleaning, security and other facilities management services for the day-to-day operational aspects of village management.

- contracting professional services for our corporate functions such as Finance, Legal, Human Resources, IT, Marketing and Leasing.

Over 90% CLV UK's Tier 1 suppliers are UK based. Other suppliers are based in Australia, China, Germany, Hong Kong, India, Ireland, Netherlands, Spain and the US.

CLV UK's workforce consists of permanent and temporary employees. Employees are recruited through direct human resources channels and UK based recruitment agencies. Our suppliers oversee the recruitment of employees for their own operations. They are expected to carry out



effective due diligence in line with our Supplier Code of Conduct to manage risks of modern slavery in their operations. Suppliers are also expected to cascade due diligence throughout their supply chains, including monitoring responsible recruitment.

CLV UK has direct visibility of its Tier 1 suppliers, but we do not have a complete view of the entities, locations or workforce arrangements within our supply chain below Tier 1. We rely on supplier engagement, contractual expectations and risk-based analysis, including insights from the Fair Supply platform, to understand and prioritise potential modern slavery risks in deeper supply chain tiers.

Our policy commitment:

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 FY26 the CLV maintained a Human Rights Policy 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

In accordance with Principle 16 of the UNGPs, this policy is approved at the most senior level of our business, is informed by relevant internal expertise, stipulates our expectations of employees and is publicly available and communicated internally.

We use our Group Responsible Sourcing Policy and Supplier Code of Conduct to communicate our human rights expectations to our suppliers.



We use the following operational policies and procedures to embed our Human Rights Policy throughout our business:

- Group Values and Code of Conduct
- Group Respect in the Workplace Policy
- Group Diversity and Inclusion Policy
- Group Fair and Transparent Business Practices Policy
- Group Compliance Policy
- Group Risk Management Policy
- Group Whistleblower Policy

Human rights concerns can be raised directly with any CLV employee or through our independent and, if required, anonymous ‘Speak Out’ Helpline. Our regional grievance policies and Group Incident Investigation Procedure outline how concerns should be addressed.

CLV Group has been a participant in the United Nations Global Compact Network Australia (UNGCA) since January 2025, and reports on human rights, labour, environment and anti-corruption against the Ten Principles of the Compact in our annual Communication on Progress.

Due diligence processes for slavery and human trafficking:

In accordance with Principles 17 to 21 of the UNGPs, the CLV Group has identified the risk of modern forms of slavery existing in our supply chains as one of our most salient human rights risks. Our human rights risk assessment was completed by our Group ESG Executive in collaboration with our Group Risk and Compliance Executive and was informed by reviewing internal documents and stakeholder consultations to identify relevant rights holders and human rights issues connected to how and where our business operates.

In the context of human rights ‘risk’ refers to the risk of harm to people, not the business, while recognising that where risks to people’s human rights are greatest, there is strong convergence with risk to the business. The severity of the human rights risks and impacts arising in the context of CLV conducting our business were assessed by reference to their scale, scope and irremediable character.



- Scale is concerned with how grave or serious the impact is.
- Scope is concerned with how widespread the impact is, or the numbers of people impacted.
- Remediability means the ability to restore those affected to a situation at least the same as, or equivalent to, their situation before the impact.

We have applied the UNGPs Continuum of Involvement to understand our role and connection to human rights harms and appropriate responses based on our level of involvement.

CLV UK's employees:

CLV UK considers the risk of modern slavery and exploitative labour practices to be low. During FY26, CLV UK employed 177 people across the UK business.

CLV UK is committed to responsible and fair employment practices and to providing a working environment in which employees are treated fairly, with dignity and respect. Employees are engaged under documented terms and conditions of employment and are paid at or above applicable National Minimum Wage requirements. Our employment arrangements also include appropriate right-to-work requirements and provide employees with access to relevant company policies and procedures.

We respect the rights of employees to freedom of association, including the right to join a trade. Employees also have access to a range of channels through which they can raise workplace concerns, including our confidential Convercent 'Speak Out' integrity hotline.

We seek to maintain an open culture in which employees feel able to raise concerns without fear of retaliation. This is supported by our annual independent Employee Engagement Survey, which provides employees with the opportunity to give anonymous feedback on their experience of working at CLV UK. In 2026, 95% of employees participated in the survey, with 84% reporting that they felt able to report dishonest or unethical practices to the appropriate level of authority without fear of reprisal. This result was in line with the High-Performance Norm benchmark.

Workers in CLV UK's supply chains

We believe there is a 'moderate low' risk that we are directly linked to modern forms of slavery that impact the human rights of workers in our upstream value chain. Our visibility of supply chain risk beyond our Tier 1 suppliers is supported by our use of the Fair Supply platform and its



methodology, which combines CLV UK spend data, supplier information, Multi-Region Input-Output economic modelling and internationally recognised modern slavery datasets to assess inherent risk through extended supply chain tiers. While this does not provide a complete map of all sub-suppliers, it provides a reasonable and evidence-based basis for identifying higher-risk categories, geographies and supply chain segments beyond our direct suppliers, and for prioritising supplier engagement and due diligence.

Existing controls include:

- A centralised procurement function that helps ensure consistency with our procurement methods and principles.
- The inclusion of an anti-slavery clause in CLV UK's template supplier contracts 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.
- Awareness training for CLV UK employees in place since 2020/2021 financial year about how to spot the signs of modern slavery and how to respond. 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.
- Expectations that our suppliers comply with the Modern Slavery Act 2015 ("Act"). If through our procurement procedure a supplier cannot satisfy us that they have controls in place to identify, assess and mitigate modern slavery risk CLV UK does not engage the supplier.
- Supply chain risk assessments and focused supplier due diligence to better understand the controls and processes high risk suppliers have in place to mitigate modern slavery in their supply chains.

New and/or updated controls in FY26 include:

- CLV Group partnered with the Fair Supply platform to update our supply chain risk assessment process. Fair Supply combines publicly available company information with CLV spend data and Multi-Region Input-Output (MRIO) economic modelling and internationally recognised modern slavery datasets, including the Global Slavery Index,



to assess inherent modern slavery risk through to tier 10 of each of our supply chains. These insights inform our annual risk assessment process (new and existing suppliers) and the prioritisation of supplier engagement and due diligence activities. Self-Assessment Questionnaires (SAQs) tailored to company size can be issued to these priority suppliers direct from the platform.

- We have zero tolerance to slavery and human trafficking and to better communicate this the CLV Group introduced a Responsible Sourcing Policy and Supplier Code of Conduct. The Supplier Code of Conduct has been incorporated into CLV UK's template supplier contracts. The Code has also been issued to all existing suppliers listed on the CLV UK database requesting them to sign and return the document. Currently, 61 suppliers have signed the Code.

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 our approach to human rights with updates provided quarterly to the Committee of Audit, Tax, Sustainability, Risk and Compliance by our Group ESG Executive who is responsible for managing and implementing 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 2026/2027 include:

- Reviewing and updating our online employee training module in relation to managing human rights risks, including modern slavery, in our operations and supply chain.
- Further embed and refine our new and existing supplier due diligence process to ensure we are prioritising action towards our high-risk suppliers.
- Continue to engage with CLV UK suppliers regarding acknowledgement of and adherence to our Supplier Code of Conduct.
- Embed a consistent set of metrics for evaluating the effectiveness of our approach to managing modern slavery risk.

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 30th June 2025. It was approved by the board on 14 September 2025.

Paul Hicken (*Director*)

CLV UK Holdings Limited

Date: 14 September 2026