

Modern Slavery and Human Trafficking Statement

Now Student Living has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (MSA).

Our Policy

Modern slavery encompasses slavery, servitude, human trafficking and forced labour (as defined below). It is a crime and a violation of fundamental human rights.

Slavery: The condition in which a person is owned as property by another who has absolute power over that person. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

Servitude: The obligation to provide services that is imposed by the use of coercion. This includes the obligation for a person to live on another person's property and the impossibility of changing his or her condition.

Forced or Compulsory Labour: Involves coercion, either through the direct threat of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily.

Human Trafficking: An offence of Human Trafficking is committed where a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. The exploitation of the potential victim does not need to have taken place for the offence to be committed.

All of the above have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Application and Responsibilities

Our responsibility applies to all persons working for us (or on our behalf) in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. The responsibilities of the individuals listed above are set out below:

Directors of the Boards: The Directors of the Company and its subsidiaries have overall responsibility for our Policy and will:

- Uphold our Policy both in its letter and spirit at all times
- Periodically review the effectiveness of our Policy and any actions taken to counter modern slavery in response to concerns raised under our Policy.

Management: Management will:

- Be responsible for the implementation and promotion of our Policy
- Ensure that their employees are aware of their responsibilities under our Policy
- Assist individuals to use the Whistleblowing services in the event that they raise a concern falling within its scope

- Procure that guidance and training is provided to employees as appropriate to ensure that the terms of our Policy are applied.

Operations Team: The Operations team will:

- Implement appropriate measures to identify, assess, reduce the risk of and prevent modern slavery in our supply chains in accordance with our Policy

All employees: All of Now Student's employees and contractors must:

- Ensure that they read and understand our Policy
- Comply with the letter and spirit of our Policy
- Raise concerns falling within the scope of our Policy promptly

Key third persons: All key third persons with whom we interact with will be:

- Given access to a copy of our Policy
- Made aware of the standards of behaviour we expect from any individual, company, partnership or other organisation who or which work for or with the Company.

Such key third persons include prospective employees, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, customers, suppliers and business partners.

Reporting

Our staff and customers are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible opportunity. Where staff and customers are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their site team or line manager.

Now Student Living aims to encourage openness and will support anyone who raises genuine concerns in good faith under our Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

