

Building Sustainable Futures Appendices

Sustainability Report for the financial year ended August 2024



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Assessing our performance

Carbon baseline

Our carbon baseline identifies our Scope 1, 2 & 3 carbon emissions under operational control for 2020/21 across our entire portfolio composition. This also provides the point from which our net zero pathway is measured. The baseline has been externally reviewed and our proposed pathway to achieve net zero carbon has been validated by the SBTi.

Global Real Estate Sustainability Benchmark

We have made submissions under GRESB since 2017. These assessments look at the ESG performance of reporting entities for the previous calendar/fiscal year. The 2024 GRESB report therefore covers activity between 1 September 2022 and 31 August 2023.

Global Reporting Initiative

The Global Reporting Initiative uses a set of global standards to report on our impacts on the economy, on the environment and on our people. Our GRI index can be found in Appendix 2.

Social Value Portal

For the third year, we commissioned the Social Value Portal to undertake a study of our social efforts and initiatives delivered through corporate activity. The Social Value Portal has applied the National Social Value Measurement Framework, known as TOMs, looking at social efforts through Themes, Outcomes and Measures. Each activity delivered by us from the TOMs has been measured to demonstrate cost-benefit to society. This year UPP has generated £1,642,096 in social value. More details are included in the Social section of Appendix 2. The methodology and detailed evaluation are also included.

Materiality assessment

A materiality assessment is the starting point for any sustainability strategy. It enables us to capture the voice of our stakeholders, identify areas of strategic focus, risks and opportunities for our business, and to then develop goals in order to address them.

[To see UPP's full materiality assessment, visit the Sustainability page of the UPP website.](#)

Appendix 1: Governance

The UPP REIT Holdings Limited Board oversees the strategic direction and governance of the Group and serves as the parent to the UPP Group Holdings Limited Board. While retaining certain key decision-making powers, such as those related to strategy and budgeting, the UPP REIT Holdings Limited Board has delegated other responsibilities to the UPP Group Holdings Limited Board and its Committees.

The Board of Directors ('the Board') of UPP REIT Holdings Limited ('the Company') recognises the importance of corporate governance driving the Group's long-term success. To align with TISE's Listing Rules, the Board has voluntarily adopted the Quoted Companies Alliance (QCA) Corporate Governance Code ("the Code"), which outlines ten principles of good governance. A summary of our adherence to these principles is provided in our Annual Report. We have evaluated the new QCA Code requirements and are working to ensure full alignment for the upcoming financial year, reinforcing our commitment to governance standards and transparency.

UGHL Board of Directors

UPP Group Holdings Limited Board is comprised of an Independent Chairman, the Chief Executive Officer, Chief Financial Officer, and Non-Executive Directors as representatives of UPP's shareholders.

The UPP Group Holdings Limited Board is responsible for overseeing the Company's stewardship, accountability, and leadership, offering clear guidance and supervision on its strategic direction and alignment with corporate goals.

Board committees

Each committee operates under specific terms of reference that outline its roles and responsibilities, reviewed annually by the respective board. Board members participate in these committees, with regular reporting provided on their activities to ensure alignment with overall governance objectives.

ESG Forum

UPP established an ESG forum in August 2021 to oversee the Company's sustainability strategy. These meetings are held quarterly and enable the business to bring together business function experts to execute the plan and to achieve our stated ESG goals.

Policies

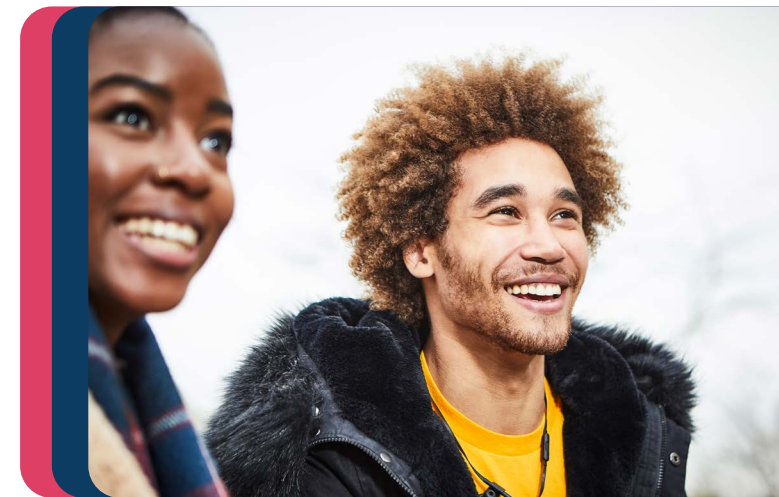
Our policies govern the activities of our colleagues, contractors, and third parties. These policies include Anti-Bribery, Modern Slavery, and Whistleblowing, which clearly outline our commitment to mitigating risks and providing guidance. They are reviewed annually by the Policy Committee.

Conflict of interests

In line with the Company's Articles of Association, the Board plays a crucial role in approving actual or potential conflicts of interest, while setting necessary limits to uphold our integrity. Each Director is encouraged to share with the Company Secretary any actual or potential interests that may conflict with the Group's interests, including outside directorships. This information is gathered annually to foster transparency. Should any interests change, we expect the Director to promptly inform the Company Secretary. At the start of each Board and Committee meeting, Directors will declare any personal interests related to agenda items and will abstain from relevant discussions. We document any potential conflicts in the minutes of the Board and Committee meetings, along with the actions taken to address them, reinforcing our commitment to accountability.

Risk management

The Group's risk management processes are embedded in each division/function to facilitate updates to key risks during the year. Risk Registers ensure focus on key risk items. The Group's principal risk management systems comprise a top ten risk register, strategic risk register, and accompanying live risk register. The aim of this is to clarify accountability for the operation of the controls to manage these risks and improve the breadth of risk management activity undertaken. Specific control owners are appointed to review and update the mitigation for the live risks. Risk registers are also maintained at subsidiary company and functional level, including for each operational site, with reviews at appropriate levels including Boards and Committees. Internal Audit, resourced by a combination of internal and external experts, periodically complete risk reviews to ensure the relevant control framework has been effectively designed and is operating in line with expectations, findings are presented to the Audit & Risk Committee and actions completed by accountable managers within considered timescales.



Appendix 2: ESG Data and GRI Index

Board evaluation

UPP's Board works to a 3-year evaluation cycle. The next evaluation is due in 2024/25. The narrative below refers to the last evaluation conducted in 2021/22.

UPP's Board Effectiveness Evaluation in 2021/22 was in the form of a questionnaire and asked individuals for feedback on the following key areas:

- a. Board composition
- b. Induction and training
- c. Board processes and supporting materials
- d. Board culture and dynamics
- e. Succession planning
- f. Overall Board effectiveness
- g. Effectiveness of the Chairman
- h. Regulation and effectiveness
- i. General comments
- j. Director self-evaluation

Within each area there were a range of questions/statements designed to assess and measure the effectiveness of the Board. Each statement requested a rating of Green, Amber, Amber-Red, Red be given:

Green	Satisfaction with performance and/or delivery
Amber	Areas requiring development
Amber-Red	Areas of concern/one to watch
Red	Areas for improvement or change

In addition, each question asked for qualitative comments for respondents to provide context and depth to their answers.

Outcome

The findings are being used to enhance board performance through examining the efficacy of the Board as a collective group.

Corporate overview

Name	UPP		
Date of Establishment	1998		
Location of Headquarters	12 Arthur Street, London, EC4R 9AB		
Group Structure and Business Outline	The UPP Group consists of UPP REIT Holdings Limited Board, subsidiaries and other associated companies. Its main business includes the design, building, financing and operation of student accommodation in partnership with universities in the UK. 60% of UPP is owed by PGGM Vermogensbaheer BV and 40% is owed by Okra Gee Investment Ltd.		
Employees	The total number of persons employed by the Group during the year was as follows:	2023/24	2022/23
	Operational Support Roles	842	893
	Professional Roles	131	122
	Professional Support Roles	97	117
	Senior Managers	28	36
	Executive and Strategic Leadership	47	50
	TOTAL	1145	1218
Turnover	£235.9m		

Value chain

GRI 2-6 Activities, value chain and other business relationships

UPP's approach is to self-deliver wherever possible including all student-facing services. We only sub-contract services or elements of services when:

1. We need to maintain a warranty by using a certain supply partner
2. There are tangible benefits in using a sub-contractor, such as where they offer technical expertise. This includes where the use of specialist expertise delivers the most appropriate solution
3. We are purchasing goods such as consumables, furniture, and white goods
4. IT services and platforms

Employees

The following tables give insight into UPP's approach to employment, including the scope and nature of impacts arising from our employment practices.

GRI 2-7 Total number of employees (permanent and temporary), broken down by gender and region

Female							Male							Grand Total
Employment type	Corporate	London	North	RS Management	South	Female total	Employment type	Corporate	London	North	RS Management	South	Male total	
Casual	2	16	6		5	29	Casual	1	11	6		3	21	50
Casual Fixed Term	17	4	2			23	Casual Fixed Term	11	2	2		1	16	39
Regular	74	152	3	10	148	553	Regular	70	119	174	17	93	473	1026
Regular Fixed Term	13	4	3			20	Regular Fixed Term	2	1	2	1	4	10	30
Grand Total	106	176	180	10	153	625	Grand Total	84	133	84	18	101	520	1145

GRI 2-7 Total number of employees (full-time and part-time), broken down by gender and region

Female							Male							Grand Total
Employment type	Corporate	London	North	RS Management	South	Female total	Employment type	Corporate	London	North	RS Management	South	Male total	
Full time	76	57	45	9	21	208	Full time	70	98	148	18	64	398	606
Part time	30	119	135	1	132	417	Part time	14	35	36		37	122	539
Grand Total	106	176	180	10	153	625	Grand Total	84	133	184	18	101	520	1145

The numbers reported are based on actual headcount, not FTE employees who were employed during the reporting period.





GRI 2-8 Workers who are not employees

This table provides an understanding of how much UPP relies on workers who are not employees to perform its work, in comparison to employees.

The most common type of agency workers are Cleaners and Facilities Officers.

Workers are all engaged via an agency. The type of work they perform is Cleaning and Maintenance. The numbers reported are based on headcount during reporting period 01/09/2023–31/08/2024.

We engage more agency workers during the summer period when deep cleaning of the accommodation is required.

Job profile	Count of worker
Accounts Payable Assistant	1
Cleaner - Heavy Duty - Hourly	13
Cleaner - Hourly	191
Customer Service and Sales Advisor	2
Data Engineer	1
Facilities Officer - Hourly	82
Finance Manager	1
Front of House Assistant - Hourly	8
Helpdesk Assistant	1
Internal Communications Manager	1
Maintenance Assistant - Hourly	64
Personal Assistant	1
Project Manager - Hourly	7
Receptionist - Hourly	12
Team Administrator	2
Work Experience Student	3
Grand Total	390

Environment

This table contains disclosures on our impact and consumption around emissions, energy and water.

GRI 305 1-7 Emissions, GRI 302 1-5 Energy, GRI 303 1-5 Water

Carbon	Scope	2021/22 Consumption	2021/22 tCO ₂ e	2022/23 Consumption	2022/23 tCO ₂ e	2023/24 Consumption	2023/24 tCO ₂ e
Gas kWh	1	87,779,000	17790	79,267,725	16065	81,799,977	16,576
Fuel oil (Temp Boilers)	1		568		1604		
Vehicle Fleet	1		68		62		67
F-Gas	1		182		182		0
Electricity kWh	2	35,135,000	6794	34,075,591	7056	31,605,569	6,544
Supplied heat	2	2,682,059	222	2,422,000	200	2,510,681	207
Water m3	3	1,284,667	568	1,268,009	479	1,226,402	416
Waste General (Tonnes)	3	3,233	69	1,757	37	1,783	11
Waste Recycled (Tonnes)	3	1,163	25	1,148	24	1,260	10
Flights	3	0	0	3,456	1		3
Commuting	3		425		425		425
Upstream good and services	3		3712		3315		3,388
Capital goods	3		1396		1861		2,155
Business Travel Trains (Miles)	3	290,477	10	404,888	27		29
Business Travel Personal Cars (Miles)	3	186,855	51	242,394	65	208598.32	56
Upstream energy emissions	3		622		610		566
Hotel stays	Other		18		5		9
Home working	Other		1206		427		427
Totals by Scope		2021/22		2022/23		2023/24	
Scope 1			18608		17913		16,643
Scope 2			7016		7256		6,751
Scope 3			6878		6846		7,496
Total			32502		32015		30,453
Other			224		432		426

Waste data

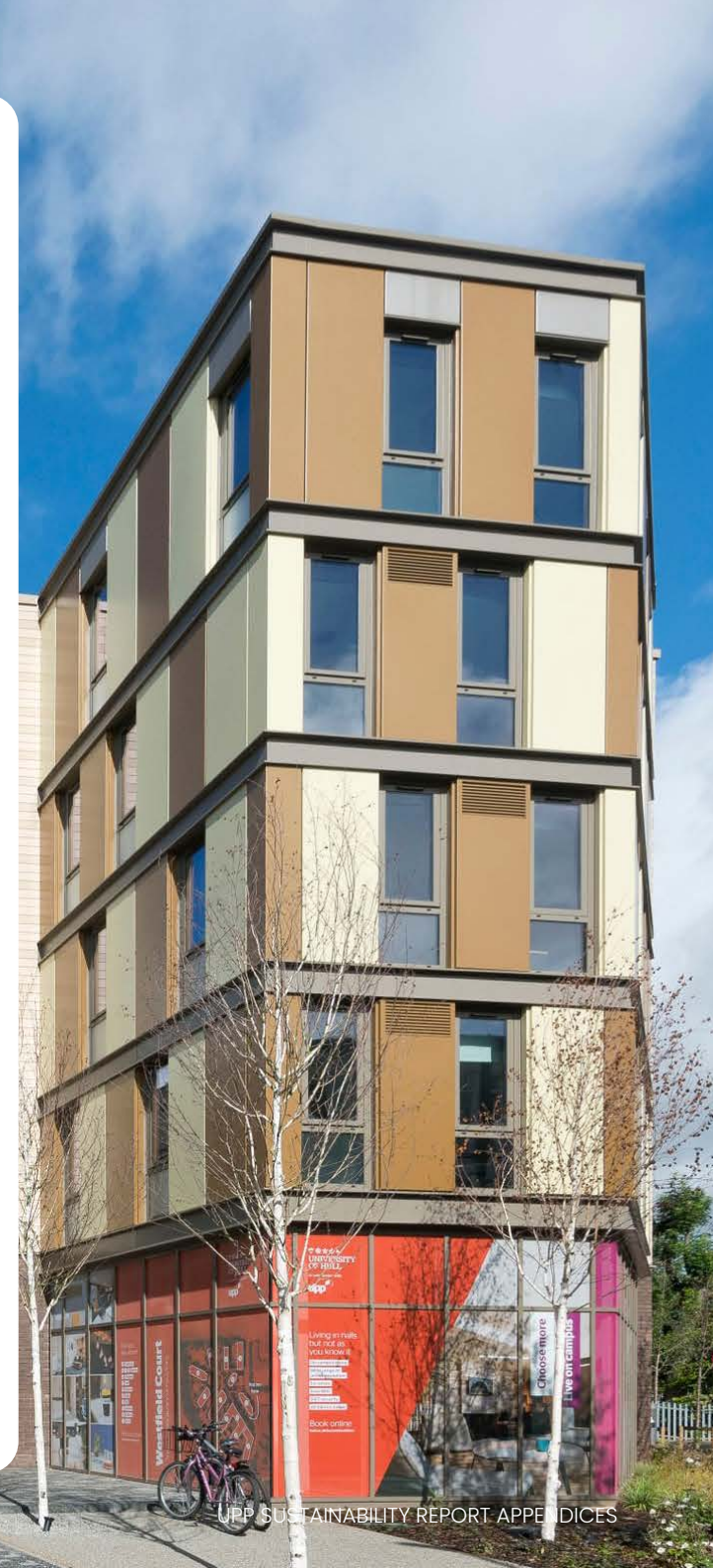
This table contains disclosures on our waste related impacts including waste directed and diverted to disposal.

GRI 306 4-5 Waste diverted from disposal

Waste stream	Type	Waste hierarchy	Tonnes 2021/22	Tonnes 2022/23	Tonnes 2023/24
General waste	Non hazardous	Recovered	1967	1662	1783
	Non hazardous	Landfill	97	87	
WEEE, fridges & freezers	Hazardous	Recovered	N/A	8	7
Clinical waste	Hazardous	Recovered	N/A	0.1	54
Mixed recycling	Non hazardous	Recycled	842	758	664
Paper/cardboard	Non hazardous	Recycled	40	85	46
Glass	Non hazardous	Recycled	156	146	193
Food waste	Non hazardous	Recycled	127	159	296
Recycling total			1164	1148	1260
Recycling rate			36%	40%	46.1%
% to landfill			6%	3%	N/A
% hazardous			N/A		0.4%

Reporting Boundaries

The reporting boundaries for 2023/24 remain unchanged from those recorded in 2022/23.



Appendix 3: Social

Social Value – Methodology

What is social value?

In simple terms, social value is the additional social, environmental, and economic benefits an organisation contributes to society as a result of how it delivers its core activity. While profit is measured in long-established accounting terms, social value is measured by tangible actions, some of which can be translated into a proxy value where appropriate. But at its core, it is about proactively building stronger communities and more sustainable organisations.

This report has discussed both 'Social and Local Economic Value' and 'Social Value' generated, as such when these terms are referenced, the meaning should be distinguished as follows:

- 'Local Economic Value' – is value that is generated for a specific local area. It is through proactively sourcing people and suppliers from the local area where there is added value. It cannot be claimed as 'Social Value' because the opportunities are displaced from elsewhere.
- 'Social Value' – is the core additional benefit created for broader society and individuals regardless of place.

How can social value be measured?

To understand the combined benefits to society delivered by UPP Ltd through 2023/24, we have employed the use of the National Social Value Measurement Framework (TOMs).

Our approach to social value originated with the TOMs, which has subsequently become the most commonly used social value framework in the UK. The National TOMs was launched in 2017 by the National Social Value Taskforce, a group that was formed by Social Value Portal in 2016 to develop a consistent and comparable measurement solution for social value.

The Taskforce is chaired by the Local Government Association, with over 40 members from organisations representing central and local government, the private sector and the third sector.

The acronym "TOMs" stands for Themes, Outcomes and Measures. The founding principle of the TOMs is to provide the connection between a broad vision for social improvement ("Themes") with strategic objectives ("Outcomes"), which in turn can then be expressed as measurable activities ("Measures").

Using the TOMs framework as part of our ESG approach creates a mutually reinforcing link between strategy and delivery.

The methodology

The TOMs framework helps organisations to objectively, rigorously, and transparently measure and articulate their social value outcomes. The Local Government Association endorses it as a reporting tool for social value.

Each measurable activity within the TOMs demonstrates its cost-benefit to society (both beneficiaries and the state) as a result of that intervention happening. This cost-benefit is referred to as the 'proxy value (£)'; which is calculated using fiscal principles as laid out by HM Treasury's Green and Magenta books for monetising economic, environmental and social impact. To result in an informed and conservative figure, the calculation uses data from a range of public, credible sources (e.g. Office of National Statistics or Unit Cost Database) and reflects the benefit above 'what would have happened anyway'. In addition to any monetised metric, it is critical to tell the human side of the social value activity through qualitative reporting alongside the quantitative, as demonstrated in this report.

In summary, the TOMs exist to promote positive social change. As users of the TOMs framework, UPP Ltd believes that creating equivalence for social value with established economic and financial reporting mechanisms – both in the public and private sectors – is the best way of embedding ESG as 'business as usual'.



2022/23 UPP TOMS Measurement Framework

Theme	Outcome	NT	Measures for 2023/24	Unit	Proxy Value (2022)	Unit Sept 2023 to Aug 2024	Social Value (£)
Jobs: promote local skills and employment	Improved skills	NT9	No. of weeks of training opportunities (BTEC, City & Guilds, NVQ, HNC - Level 2,3, or 4+) on the contract that have either been completed during the year, or that will be supported by the organisation until completion in the following years	No. weeks	£251.79	12	£3813.86
	Improved skills	NT10	No. of weeks of apprenticeships or T-Levels (Level 2,3, or 4) provided on the contract (completed or supported by the organisation)	No. weeks	£251.79	156	£39,279.33
Growth: supporting growth of responsible regional business	Improved self-reliance and independence	NT15	Provision of expert business advice to VCSEs and MSMEs	No. staff expert hours	£101.00	120	£12,120.00
	Improving colleague wellbeing and mental health	NT20	No. of employees on the contract that have been provided access for at least 12 months to comprehensive and multidimensional wellbeing programmes	No. employees provided access	£130.29	1145	£149,182.05
		NT21	Equity, diversity and inclusion training provided both for UPP colleagues and supply chain employees	No. hrs (total session duration)* no. attendees	£101.00	779.12	£78,691.12
		NT39	Mental Health campaigns for colleagues on the contract to create community of acceptance, remove stigma around mental health	£ invested including colleague time	£1.00	57051.55	£57,051.55
	Reducing inequalities	NT41	Percentage of colleagues on contract that is paid at least the relevant Real Living wage as specified by Living Wage foundation	%	Record only		
Social: healthier, safer and more resilient communities	Improved self-reliance and independence	NT26	Initiatives to engage the community in health or wellbeing initiatives	No. staff volunteering hours	£1.00	5030.28	£5,030.28
	More working with the community	NT28	Donations and/or in-kind contributions to specific local community projects (£ & materials)	£ value	£1.00	274,000	£274,000
		NT29	No. of hours of volunteering time provided to support local community projects	No. staff volunteering hours	£16.93	1087	£18,402.91

2022/23 UPP TOMS Measurement Framework - continued

Theme	Outcome	NT	Measures for 2023/24	Unit	Proxy Value (2022)	Unit Sept 2023 to Aug 2024	Social Value (£)
Environment: decarbonising and safeguarding our world	Initiatives are supported	NT86	Volunteering time for environmental conservation & ecosystem management	No. staff volunteering hours	£16.93	192.8	£3,264.10
Environment: decarbonising and safeguarding our world	Carbon emissions are reduced	NT44	Policy and programme to achieve net zero carbon including monitoring plan with specific milestones	Yes, Net Zero before or by 2030, 2040 or 2050	Record only		
	Air pollution is reduced	NT46	Corporate travel schemes available to employees on the contract (subsidised public transport, subsidised cycling schemes and storage, sustainable corporate transport such as electric bus from public station to corporate facilities)	Y/N	Record only		
	Safeguarding the natural environment	NT53	Innovative measures to safeguard the environment	£ value	£1.00	940,274	£940,274
	Safeguarding the natural environment	NT67	Donations or investments towards initiatives aimed at environmental and biodiversity conservations and sustainable management projects for both marine and terrestrial ecosystems	£ value	£1.00	52,234	£52,234
	Resource efficiency and circular economy solutions are promoted	NT88	Reduce waste through reuse of products and materials	Tonnes	£96.70	89.48	£8,652.72
	Safeguarding the natural environment	NT90	Influencing staff, suppliers, customers & communities to protect the environment	No. staff expert hours	£101.00	1	£101.00
Total							1,642,096.92

Equity, diversity, and inclusion

The following tables include UPP's disclosures on our impacts related to diversity and equal opportunity at work, looking at gender, disability, ethnicity, age and sexual orientation split by occupational roles (employee category).

% of overall employees in each employee category

	% of Employees	
	23/24	22/23
Executive & Strategic Leadership	4.10%	4.10%
Operational Support Roles	73.54%	73.30%
Professional Roles	11.44%	10%
Professional Support Roles	8.47%	9.70%
Senior Managers	2.45%	2.9%
Grand Total	100%	100%

GRI 405-1 Age range and gender split of employees

Age range and gender	% of Total	
	23/24	22/23
Under 30 Years Old	17.82%	19%
Female	54.90%	61%
Male	45.10%	39%
30-50 Year Olds	41.75%	45%
Female	55.44%	55%
Male	44.56%	45%
Over 50 Years Old	40.44%	36%
Female	53.56%	55%
Male	46.44%	47%
Grand Total	100%	100%

GRI 405-1 Disability of employees

Disability	% of Total	
	23/24	22/23
No	86.55%	85%
No Data/Prefer not to say	11.09%	12%
Yes	2.36%	3%
Grand Total	100%	100%

GRI 405-1 Sexual orientation of employees

Sexual Orientation	% of Employees	
	23/24	22/23
Bisexual	3.32%	4%
Gay man	0.96%	1%
Gay woman/Lesbian	0.96%	1%
Heterosexual/Straight	75.90%	74%
Other	2.27%	3%
Prefer not to say / blank	16.59%	17%
Grand Total	100%	100%

GRI 405-1 Ethnicity of employees

Ethnicity	% of Total	
	23/24	22/23
All other ethnic groups combined	26.46%	26%
No Data/Prefer not to say	9.61%	10%
White	63.93%	64%
Grand Total	100%	100%

Equity, diversity, and inclusion - continued

Identifier: executive and strategic leadership		
Category	Identifier	% of employees in each identifier by category
Gender	Female	42%
	Male	58%
Age	Under 30	0%
	30-50	64%
	Over 50	36%
Ethnicity	White	81%
	No Data/Prefer Not to Say	9%
	All other ethnic groups combined	11%
Disability	No	94%
	Prefer not to say/no data	6%
	Yes	0%
Sexual orientation	Bisexual	0%
	Gay man	6%
	Gay woman/Lesbian	0%
	Heterosexual/Straight	77%
	Other	0%
	Prefer not to say / blank	17%

Identifier: senior managers		
Category	Identifier	% of employees in each identifier by category
Gender	Female	39%
	Male	61%
Age	Under 30	0%
	30-50	46%
	Over 50	54%
Ethnicity	White	75%
	No Data/Prefer Not to Say	4%
	All other ethnic groups combined	21%
Disability	No	89%
	Prefer not to say/no data	11%
	Yes	0%
Sexual orientation	Bisexual	4%
	Gay man	4%
	Gay woman/Lesbian	0%
	Heterosexual/Straight	79%
	Other	0%
	Prefer not to say / blank	14%

Equity, diversity, and inclusion - continued

Identifier: operational support roles		
Category	Identifier	% of employees in each identifier by category
Gender	Female	60%
	Male	40%
Age	Under 30	20%
	30-50	38%
	Over 50	42%
Ethnicity	White	58%
	No Data/Prefer Not to Say	11%
	All other ethnic groups combined	30%
Disability	No	84%
	Prefer not to say/no data	13%
	Yes	2%
Sexual orientation	Bisexual	3%
	Gay man	0%
	Gay woman/Lesbian	1%
	Heterosexual/Straight	73%
	Other	3%
	Prefer not to say / blank	19%

Identifier: professional support roles		
Category	Identifier	% of employees in each identifier by category
Gender	Female	38%
	Male	62%
Age	Under 30	19%
	30-50	46%
	Over 50	35%
Ethnicity	White	86%
	No Data/Prefer Not to Say	2%
	All other ethnic groups combined	12%
Disability	No	90%
	Prefer not to say/no data	6%
	Yes	3%
Sexual orientation	Bisexual	4%
	Gay man	1%
	Gay woman/Lesbian	0%
	Heterosexual/Straight	90%
	Other	1%
	Prefer not to say / blank	4%

Equity, diversity, and inclusion - continued

Identifier: professional roles		
Category	Identifier	% of employees in each identifier by category
Gender	Female	43%
	Male	57%
Age	Under 30	20%
	30-50	38%
	Over 50	42%
Ethnicity	White	76%
	No Data/Prefer Not to Say	6%
	All other ethnic groups combined	18%
Disability	No	92%
	Prefer not to say/no data	5%
	Yes	3%
Sexual orientation	Bisexual	4%
	Gay man	1%
	Gay woman/Lesbian	0%
	Heterosexual/Straight	90%
	Other	1%
	Prefer not to say / blank	4%

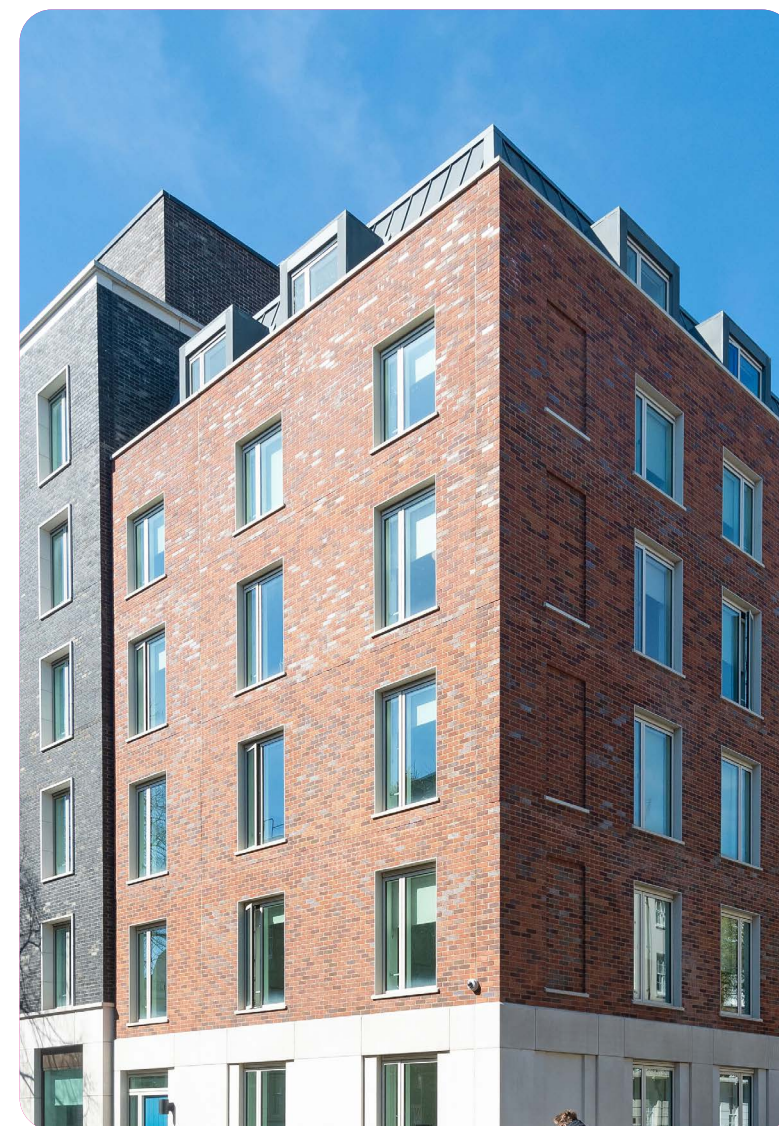


GRI 405-2 Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation

With a firm focus on equity and diversity within the workplace, UPP has made positive progress with the gender pay gap continuing to reduce. Almost 50% of our workforce are in part time positions, which impacts the gender pay gap. Part time work is often a positive choice and offers individuals a balance between working and other interests and responsibilities. The responsibility for caring for children continues to be disproportionately taken on by mothers which makes them likely to work less.

Region	Total employees	Part time	% of PT employees	
Corporate	163	32	19.63%	
Residential	982	507	51.63%	
Total	1145	539	47.07%	

Average Gross Earnings *	Female	Male	Ratio
Corporate			
Executive & Strategic Leadership	£285,338.07	£151,260.92	1.9:1
Operational Support Roles	£8,095.57	£7,607.21	1.1:1
Professional Roles	£50,500.98	£56,477.39	0.9:1
Professional Support Roles	£34,286.03	£39,604.14	0.9:1
Senior Managers	£79,405.26	£72,787.85	1:0.9
London			
Operational Support Roles	£14,828.98	£21,274.35	0.7:1
Professional Roles	£26,942.63	£37,266.65	0.7:1
Professional Support Roles	£25,180.65	£40,648.84	0.6:1
Senior Managers	£74,383.75	£61,242.26	1.2:1
North			
Operational Support Roles	£12,957.19	£20,266.29	0.6:1
Professional Roles	£30,505.79	£38,436.31	0.8:1
Professional Support Roles	£40,403.61	£30,234.80	1.3:1
Senior Managers	£51,541.06	£72,597.40	0.7:1
RS Management			
Executive & Strategic Leadership	£114,852.71	£81,013.49	1.4:1
Professional Roles	£41,914.25	£45,297.43	0.9:1
Professional Support Roles	£20,342.43	£25,484.75	0.8:1
South			
Operational Support Roles	£12,279.92	£16,506.55	0.7:1
Professional Roles	£32,400.93	£31,239.66	1:1
Professional Support Roles	£23,129.29	£32,386.96	0.7:1
Senior Managers	£47,713.49	£65,028.23	0.7:1



* Gross earnings include all average earnings including bonus and pension.

Health, safety and wellbeing

GRI 403-1 Occupational health and safety management system

We have a health and safety management system in place which has been certified to meet the standards of ISO45001. Legal requirements and the requirements of ISO45001 form the basis of the management system. Legal requirements are identified and managed via the legal register, which sits on the Barbour system and is made available on UPP's intranet, Campus.

We have a dedicated in-house Safety, Health and Wellbeing team, all of which are members of IOSH, responsible for the maintenance and continuous improvement of the management system as well as providing guidance to the site teams.

GRI 403-2 Hazard identification, risk assessment, and incident investigation

Our risk management procedure starts with baseline risk assessments which cover the main activities on our sites. All of our sites take these baseline risk assessments and make them specific to their local environment, adding any hazards and/or control measures where necessary. Sites are also required to put in place risk assessments for any additional activities not covered by the baseline assessments. Our General Managers are trained to Level 3 in health and safety. All risk assessments are completed with the assistance of front-line colleagues who undertake the work to ensure all hazards are included.

Risk assessments are reviewed annually by site teams to ensure they are still suitable and relevant. Review of risk assessments form part of the accident investigation process. Risk assessments are reviewed as part of internal and external audits. The SHaW team undertakes monthly assurance checks which review compliance with the procedures and the effectiveness of the management system.

As part of the risk management process, employees are involved in the review of the risk assessment associated with their work and are encouraged to raise additional risks and hazards. We deploy a near miss system where anyone can report a hazard. All near misses are reviewed by the SHaW team.

All employees are empowered to stop what they are doing if they feel unsafe.

In addition, we use an online adverse event reporting system which all employees have access to. On the system accidents, incidents, near misses, and fire alarm activations can be reported. All adverse events are reviewed by the SHaW team and where necessary will support site teams with investigations. As part of the investigations, root causes will be identified using the 5 Whys process and corrective actions will be captured on the system. Any outstanding accident investigations will be reported and escalated up the management line.

GRI 403-3 Occupational health services

We partner with Wellness International who undertake pre-placement questionnaires for all new starters and Tier 2 HAVS health surveillance for those members of staff who use vibrating tools. The level of health surveillance required is highlighted in the procedures as part of the management system. Quarterly meetings take place with Wellness International.

GRI 403-4 Worker participation, consultation, and communication on occupational health and safety

We have developed an organisational procedure which includes a series of employee fora. The fora are site based, regional and national. At these fora, representatives from front-line teams as well as corporate services review health and safety performance and raise any health and safety concerns or issues. All fora take place as a minimum every six months and are led by the relevant General Manager or relevant Site Lead. Site based fora have representatives from all departments on site, and each site is represented in the regional and national forum. Significant issues raised at the fora are escalated up to the appropriate level for action.

As part of the review of the management system procedure there is a consultation process where proposed changes are made available to everyone in the business via the consultation page; everyone is free to make comments. All comments are fed back to the author for review.

There is a community of safety ambassadors and wellbeing facilitators who act as points of contact at sites and as a voice for their colleagues.

GRI 403-5 Worker training on occupational health and safety

We deploy a training matrix which identifies the support required per role and/or location. This is supplemented by safety briefings which are part of the management system. Training is delivered online via the Workday system or via external providers. All new starters receive induction training where manual handling and fire safety awareness is undertaken as a minimum.

403-6 Promotion of worker health

Annual on-site health checks take place as part of our wellbeing programme. These health checks are available to all employees. The SHaW teams receive a report of the generic findings from the checks and with this information we plan further health promotions. An example of this is the step challenge which took place this year following the health checks flagging a risk from being inactive.





403-9 Work related injuries

This table contains our disclosures for information about occupational health and safety-related impacts – work related injuries

Employees		
	22/23	23/24
Number of fatalities	0	0
Rate of fatalities	0	0
Number of high consequence work related injuries	0	0
Rate of high consequence work related injuries	0	0
Number of recordable work-related injuries (injuries which have resulted in first aid treatment or more)	19	28
Rate	35.6 (36/1010676.90*1000000)	35.6 (36/1010676.90*1000000)
Main types of work related injury	Cuts and grazes, slips trips and falls and manual handling	Slips, trips and falls, cuts and grazes and Manual handling
Total number of employees during the period	1257	1145
Number of hours worked	1,284,915.12 hours	1,303,515.46 hours
Non-employees (contractor and agency employees)		
	22/23	23/24
Number of fatalities	0	0
Rate of fatalities	0	0
Number of high consequence work-related injuries	0	0
Rate of high consequence work-related injuries	0	0
Number of recordable work-related injuries	6	7
Rate of recordable work-related injuries	Data unavailable	Data unavailable
Main types of work-related injury	Cuts and Grazes	Cuts and Grazes
Number of hours worked	Data unavailable	Data unavailable

Student wellbeing and belonging

UPP residents were asked as part of a wider survey if they felt part of a residence community with 70.4% of UPP residents responding 'Yes'. This result represents an increase of 2.3% points compared to the previous year.

Do you feel part of a residence community?

2023/24 responses (6 sites)

Yes (%)	No (%)
70.4%	29.6%

Jobs and skills

Investors in People

For the second time, in March 2024, UPP was awarded the gold standard in Investors in People category 'We invest in people'. This achievement underscores our commitment to excellence and continuous improvement in our efforts that make UPP a great place to work. In achieving Gold, UPP has demonstrated the effectiveness of our approach to supporting colleagues through active engagement.

The strengths highlighted by our assessors were:

- **Investment in People:** We have made substantial investments in our teams through programs like the License to Recruit, which supports hiring managers, and our Leading the Way and Leading Starts Here initiatives.
- **Unified Strategic Vision:** Our dedication to the Building Sustainable Futures strategy ensures that our goals and KPIs are aligned, driving us towards a common objective.
- **Responsible Business Practices:** Our commitment to being a responsible business is evident through the efforts of the UPP Foundation and our sustainable initiatives at both local and group levels.
- **Student-Centric Approach:** We prioritize the needs of our students, addressing everything from cleaning and maintenance to their overall wellbeing.

The Gold Standard Accreditation is a remarkable achievement, reflecting the hard work and dedication of the entire UPP team.



UPP Employee Engagement Survey 2024

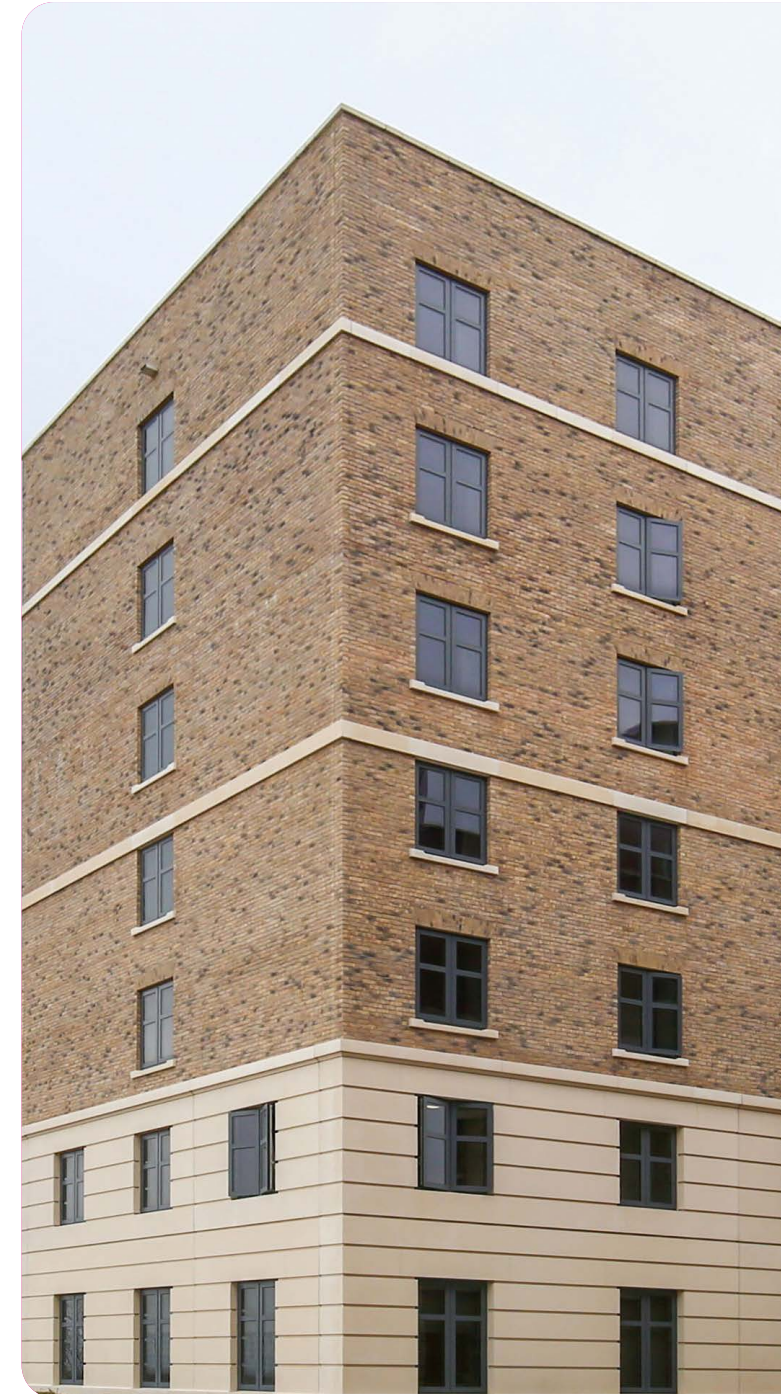
Employee participation	Employee engagement score
88%	7.7/10

Responsible supply chain management

UPP spent over £55 million in the past academic year with almost a third of our procurement activities contracted with local suppliers. Local suppliers are defined as those registered in the same county as our UPP sites or within a 75-mile radius of the service delivery site.

Summary

Total addressable spend	£55,705,726
Local suppliers	15,594,603
Percentage	28%



Appendix 4: Global Reporting Initiative Content Index

Statement of use	UPP has reported in accordance with the GRI Standards for the period 01/09/2023–31/08/2024
GRI 1 Used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	As a bespoke design, build, finance and operate 'DBFO' student accommodation business, the current GRI Sector Standards are not applicable or relevant to UPP.

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
GRI 2 General Disclosures	The organization and its reporting practices	2-1 Organizational details	Appendix 3, Corporate Overview
		2-2 Entities included in the organization's sustainability reporting	Appendix 2, Corporate Governance
		2-3 Reporting period, frequency and contact point	<ul style="list-style-type: none"> a. 01.09.23–31.08.24 – annual reporting b. 01.09.23–31.08.24 – financial reporting c. 11.06.25 d. richard.brabner@upp-ltd.com
		2-4 Restatements of information	We have not made any restatement in the reporting period.
	Activities and workers	2-5 External assurance	<ul style="list-style-type: none"> a. External assurance from an accredited GRI assessor was approved by UPP's ESG Forum and Executive Leadership b. See appendix 5 (page 44)
		2-6 Activities, value chain and other business relationships	Appendix 3, Value Chain
		2-7 Employees	Appendix 3, Employees
		2-8 Workers who are not employees	Appendix 3, Employees

GRI Standard	Topic	Disclosure	Location and comments																														
General Disclosures																																	
GRI 2 General Disclosures	Governance	2-9 Governance structure and composition	<p>UPP REIT Holdings Limited Annual Report 2024 Corporate Governance Statement pg 17 Appendix 2, Governance 7 directors on URHL – 5 men, 2 women</p> <table border="1"> <thead> <tr> <th></th> <th>Date Joined</th> <th>Date Resigned</th> </tr> </thead> <tbody> <tr> <td>David Montague</td> <td>09 July 2024</td> <td>-</td> </tr> <tr> <td>Elaine Hewitt</td> <td>07 April 2020</td> <td>-</td> </tr> <tr> <td>Mark Bamford</td> <td>03 October 2022</td> <td>-</td> </tr> <tr> <td>Kai Chen</td> <td>25 July 2023</td> <td>-</td> </tr> <tr> <td>Chilei Kao</td> <td>06 September 2022</td> <td>-</td> </tr> <tr> <td>Brian Welsh</td> <td>20 March 2023</td> <td>-</td> </tr> <tr> <td>Stuart Bousfield</td> <td>16 April 2024</td> <td>-</td> </tr> <tr> <td>Natasha Mol-Knechtel</td> <td>09 November 2022</td> <td>16 April 2024</td> </tr> <tr> <td>Robert McClatchey</td> <td>28 February 2018</td> <td>9 July 2024</td> </tr> </tbody> </table> <p>vi. and vii. We do not collect this data</p>		Date Joined	Date Resigned	David Montague	09 July 2024	-	Elaine Hewitt	07 April 2020	-	Mark Bamford	03 October 2022	-	Kai Chen	25 July 2023	-	Chilei Kao	06 September 2022	-	Brian Welsh	20 March 2023	-	Stuart Bousfield	16 April 2024	-	Natasha Mol-Knechtel	09 November 2022	16 April 2024	Robert McClatchey	28 February 2018	9 July 2024
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Stuart Bousfield	16 April 2024	-																															
Natasha Mol-Knechtel	09 November 2022	16 April 2024																															
Robert McClatchey	28 February 2018	9 July 2024																															
		2-10 Nomination and selection of the highest governance body	<p>UPP REIT Holdings Limited has a shareholder agreement between its beneficial owners and management. Section 6 of this agreement sets out the arrangements for the composition of the highest governing body. UPP REIT Holdings Limited is comprised of an Independent Chairman, the Chief Executive Officer, Chief Financial Officer, and Non- Executive Directors as representatives of UPP's shareholders.</p> <p>The UPP Group Holdings Board is comprised of the Independent Chairman, the Chief Executive Officer, representatives of UPP's shareholders as well as UPP Directors from the Executive Leadership Team including the Chief Financial Officer. This ensures the right blend of commercial and governance experience, independence, and challenge to enable the Directors to discharge their duties and responsibilities effectively. We ensure that the diverse range of skills and backgrounds of the Directors prevents any undue individual or collective influence over the Board's decision making.</p> <p>The Group fully recognises the benefit of diversity, including gender and ethnic diversity, when the Committee is searching for candidates for Board appointments our policy is to appoint the best possible candidate considered on merit and against objective criteria, rather than set objectives on gender that may deflect from achieving this fundamental target on each occasion.</p>																														

GRI Standard	Topic	Disclosure
General Disclosures		
GRI 2 General Disclosures	Governance	2-11 Chair of the highest governance body UPP REIT Holdings Annual Report 2024 pg 18
		2-12 Role of the highest governance body in overseeing the management of impacts UPP REIT Holdings, as the governing body of the group, focuses on its strategic priorities through a well-defined approach. The organisation's leadership fosters a culture of collaboration, innovation, and accountability, encouraging its diverse teams to work cohesively towards common objectives. UPP REIT Holdings also demonstrates agility in responding to market trends and adapting its strategies accordingly, ensuring it remains at the forefront of the industry. Additionally, robust risk management practices and prudent financial planning contribute to the sustainable achievement of its strategic priorities, safeguarding the interests of stakeholders while pursuing growth and profitability. UPP REIT Holdings Annual Report 2024 Governing structure - page 18 Strategic framework - page 10 Where and how - page 10-11 People - page 21
		2-13 Delegation of responsibility for managing impacts UPP REIT Holdings Annual Report 2024 Page 20/22-23 - role of Chairman, CEO and Board. Outlines the responsibilities and matters reserved for the Board UPP's highest governance body, UPP REIT Holdings Limited, has delegated responsibility for reviewing and approving the sustainability report information including the organisation's material topics to the ESG Forum which has representation from UPP's Executive Team.
		2-14 Role of the highest governance body in sustainability reporting UPP REIT Holdings Annual Report 2024 UPP's highest governance body, UPP REIT Holdings Limited, has delegated responsibility for reviewing and approving the sustainability report information including the organisation's material topics to the ESG Forum which has representation from UPP's Executive Team. Appendix 1, Governance
		2-15 Conflicts of interest We have two stages, firstly the requestor must declare any COI when completing the internal new supplier request, there is a yes/no question on the form they complete that they have to answer. Then secondly the supplier also needs to declare whether there is any COI on the form they return to us prior to setting up. UPP REIT Holdings Annual Report 2024 B. i. iii. Page 28-29 - COI and related parties' statement

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
GRI 2 General Disclosures	Governance	2-15 Conflicts of interest (continued)	<p>ii. There are no cross shareholdings with suppliers. Where partners have a minority interest these are disclosed within the SPV accounts</p> <p>iv. UPP maintains a COI register</p> <p>Gifts and Hospitality Policy</p> <p>Code of Business Ethics Policy</p>
		2-16 Communication of critical concerns	<p>UPP REIT Holdings Limited has established a risk management process for escalating critical issues in the normal course of business. This involves UPP REIT Holdings Limited risk register, functional level risk registers, and site-specific risk registers. The aim of this is to clarify accountability for the operation of the controls to manage these risks and improve the breadth of risk management activity undertaken. Specific control owners are appointed to review and update the mitigation for the live risks. Risk registers are also maintained at subsidiary company and functional level, including for each operational site, with reviews at appropriate levels including Boards and Committees.</p> <p>For immediate critical risks occurring outside of the normal course of business the group has a well-established business continuity plan including crisis communications with decisions and communications cascading out lined in detail. Each site also has its own bespoke Incident Management Plan (IMP) identifying all local owners on risks.</p> <p>There were no critical concerns reported to the highest governing body during the reporting period.</p>
		2-17 Collective knowledge of the highest governance body	UPP's highest governing body set the company's ESG strategy, commitments and targets. It tracks, on an annual basis, its ESG roadmap and progress UPP is making on GRESB. The Board meets bi-monthly and all subject specific Board papers consider ESG implications.
		2-18 Evaluation of the performance of the highest governance body	Not applicable - UPP's board evaluation focuses on an evaluation of themselves and does not currently reference ESG.

GRI Standard	Topic	Disclosure
General Disclosures		
GRI 2 General Disclosures	Governance	<p>2-19 Remuneration policies</p> <p>a. UPP has an independent remuneration committee which oversees the process for determining remuneration for senior executives. The committee includes members from both shareholders.</p> <p>UPP REIT Holdings Annual Report 2024, page 26</p> <p>a i-v; b. Not applicable. As a private limited company, we are not required to disclose the remuneration of senior management.</p>
		<p>2-20 Process to determine remuneration</p> <p>We have an independent Remuneration Committee which sets the overall policy and approach to setting pay and conditions, which includes shareholder membership. We also support the Living Wage Foundation principles and follow their recommended pay rates.</p>
		<p>2-21 Annual total compensation ratio</p> <p>a. 49:6:1</p> <p>b. 1:5:1</p> <p>c. Chairman and Non-Executive Directors have been excluded from this data as they do not have an employment contract but have a Non-Executive Director (NED) contract. The highest paid individual is in the role of CEO.</p>
		<p>2-22 Statement on sustainable development strategy</p> <p>Foreword (main report: page 2)</p>

GRI Standard	Topic	Disclosure
General Disclosures		
GRI 2 General Disclosures	Governance	<p>2-23 Policy commitments</p> <p>Our policy commitments cover all internationally recognised human rights</p> <p>a.</p> <p>i. ii. iv. Not applicable – UPP is not required to comply with any of the stipulated intergovernmental instruments</p> <p>iii. UPP evidence the three key areas of the precautionary principle as per the following:</p> <ul style="list-style-type: none"> • Risk governance (risk assessment management and communication) – Risk Management Framework • Science Policy Interfaces – Policy Centre / Safety, Health and Wellbeing site • Link between and precaution and innovation – Sustainability Policy <p>b</p> <p>i-ii Modern Slavery and Human Trafficking Statement 2022-23 Stakeholders include material suppliers, labour agencies and subcontractors. Specific vulnerable groups not included in the statement as the policy sets out the steps that UPP takes to ensure that modern slavery or human trafficking is not taking place within any part of our business or supply chain. The policy was approved by URHL Board.</p> <p>c. Our Policies – UPP Ltd (upp-ltd.com)</p> <p>d. Policy Committee has delegated responsibility to draft, review, revise, publish, and communicate policy commitments. URHL – the most senior body – ratifies The Modern Slavery and Human Trafficking Statement.</p> <p>e. Report the extent to which the policy commitments apply to the organization’s activities and to its business relationships; Policy commitments apply to all UPP’s activities. The Modern Slavery and Human Trafficking Statement applies to our supply chain.</p> <p>f. Policy commitments are communicated via internal channels and are available on UPP’s interchange for all colleagues to view. Key policy commitments are published on our website.</p>
		<p>2-24 Embedding policy commitments</p> <p>All business policies are available through the Policy Centre. It is resourced is to provide guidance on what to expect from us as an employer. The policies underpin how we do business and support our values. All latest approved versions of a policy will be found in this centre. Policies are organised by department and alphabetical order.</p> <p>The UPP Group Holdings Board has delegated responsibility for reviewing policies to the Policy Committee. All policies, with the exception of Health and Safety Executive policies, are reviewed by the Policy Committee. The Governance, Risk and Compliance team is responsible for managing the formal approval process for the creation of new policies.</p> <p>Once a new policy has been approved by its Policy Sponsor, it will then be uploaded onto the Policy Centre. The Policy Committee consists of the Director of Governance, Risk and Compliance, Chief HR Officer and the Chief Financial Officer.</p>

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
GRI 2 General Disclosures	Strategy, policies and practices	2-25 Processes to remediate negative impacts	We subscribe to the National Student Accommodation Codes in our own right or via our university partners (Unipol Student Homes) We also sit on the national codes Committee of Management where the effectiveness of the complaints procedures and associated trends are monitored.
		2-26 Mechanisms for seeking advice and raising concerns	UPP REIT Holdings Annual Report 2024 , page 30
		2-27 Compliance with laws and regulations	There were no significant instances of non-compliance with laws and regulations and no fine were paid during the reporting period
		2-28 Membership associations	Investors In People
	Stakeholder Engagement	2-29 Approach to stakeholder engagement	UPP REIT Holdings Annual Report 2024 , page 30
		2-30 Collective bargaining agreements	a- b. Not applicable to UPP. No collective bargaining arrangements are in place and information is not collected on which employees are members of a Trade Union. UPP has a Remuneration Committee who set the overall policy and approach to setting pay and conditions. UPP supports the Living Wage Foundation principles and follow their recommended pay rates.

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topics: Climate Change Environmental Impact Energy & Emissions			
GRI 3: Material Topics 2021	3-1	3-1 Process to determine material topics	3ai: Materiality and stakeholder engagement 3aii: The impact assessment has been completed in the ISO14001 Aspects and Impacts assessment. 3b: Materiality and stakeholder engagement
		3-2 List of material topics	a. Materiality and stakeholder engagement b. There have been no changes to the list of material topics since the previous reporting period
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive summary: Our ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitment	Assessing Our Performance, Environment, pages 10-12 Our performance, reference to ISO14001 certification, which includes Policy Statement & Progress Tables page 4-7
		3-3d-e Management of topic and impacts	Executive summary: Our ESG goals, page 4 Di, ii, iii: Assessing Our Performance, Environment, pages 10-12 Ei: Appendix 2: ESG Data and GRI Index, page 6 Eii: Progress Report, pages 5-9 Eiii: Appendix 2: ESG Data and GRI Index, page 6 Eiv: Progress Report, pages 5-9
Material Topic: Energy & Emissions"		3-3f Engagement with stakeholders	Materiality and stakeholder engagement
GRI 305: Emissions 2016	Topic-specific disclosures	1-1 Offsets	No offsets have been purchased
		305-1 Direct (Scope 1) GHG emissions	A: Scope 1: 17,189; All scopes: 44,288tCO ₂ e B: carbon dioxide (CO ₂), methane (CH ₄), nitrous oxide (N ₂ O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF ₆) and nitrogen trifluoride (NF ₃) C: N/A we do not burn these sources d. Base year is 2020/21 i. Base year chosen to meet the target of starting the reporting ii. UPP's 2023 Sustainability Report page 58 iii. Baseline has not been recalculated E: first year of complete data. Based on conversation and guidance from SBTi F: SBTi, GHG protocol; Methodological statement

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Energy & Emissions			
GRI 305: Emissions 2016	Topic-specific disclosures	305-2 Energy indirect (Scope 2) GHG emission	<p>Appendix 2: ESG Data and GRI Index: Environment, page 11</p> <p>a. Please refer to table Environment: GRI 305 1-7 Emissions, GRI 302 1-5 Energy, GRI 303 1-5 Water 6751- in Carbon data table</p> <p>b. 6751- in Carbon data table</p> <p>c. All</p> <p>d. Base year is 2020/21</p> <p>i. Base year chosen to meet the target of starting the reporting</p> <p>ii. UPP's 2023 Sustainability Report page 13</p> <p>iii. Baseline has not been recalculated e. UK Government GHG Conversion Factors for Company Reporting</p> <p>f. Operational control g. Appendix, methodology statement Environment chapter, Energy & Carbon</p> <p>g. Methodological statement</p>
		305-3 Other indirect (Scope 3) GHG emission	<p>Appendix 2: ESG Data and GRI Index: Environment, page 11</p> <p>a. 7494 – Carbon data</p> <p>b. All</p> <p>c. 0 UPP do not undertake the combustion or biodegradation of biomass</p> <p>d. Carbon data (see page 8 of these appendices)</p> <p>e. i. 2020/21 chosen as it was the first full year of data available and aligns to SBTi baseline year</p> <p>ii. UPP's Sustainability Report 2023, page 58</p> <p>iii. Baseline year has not been recalculated</p> <p>f. UK Government GHG Conversion Factors for Company Reporting</p> <p>g. Not applicable - UPP has not undertaken any GHG trades</p> <p>See Methodological statement</p>
		305-4 GHG emissions intensity	<p>Appendix 3: ESG Data and GRI Index: Environment</p> <p>a. 0.87 tCO₂e</p> <p>b. Room</p> <p>c. 1,2,3</p> <p>d. All</p>
		305-5 Reduction of GHG emission	<p>Appendix 3: ESG Data and GRI Index: Environment</p> <p>a. 1562 – added to performance tables</p> <p>b. All</p> <p>c. Year on year</p> <p>d. All e. GHG Protocol applied</p>
		305-6 Emissions of ozone-depleting substances (ODS)	a-d. Not applicable. UPP does not import or export ODS
		305-7 Nitrogen oxides (NOx), sulfur oxides (Sox), and other significant air emissions	We do not currently have the data for this metric; we are developing methods for doing so

Material topics: energy and carbon – continued

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Energy & Emissions			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3 Management of material topics	Executive summary: Our ESG Goals page 4 Assessing Our Performance, Environment pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive summary: Our ESG Goals page Progress tables, pages 5-9 Assessing Our Performance, Environment pages 10-12 Materiality and stakeholder engagement

Material topics: energy and carbon – continued

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Energy & Emissions			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3d-e Management of topic and impacts	di. UPP conducted a materiality assessment, which forms the basis of the aspects and impacts assessment within the ISO14001 certified environmental management system dii. Aspects are prioritized against a risk scoring – impact and severity – within the A&I register diii. The system is implemented by the Director of Energy and Environmental Sustainability. It is externally certified by BSI e. See above. Environment chapter, Executive summary: Our ESG goals & Progress Tables & Water – Page 42
		3-3f Engagement with stakeholder	Materiality and stakeholder engagement
GRI 302: Energy 2016	Topic specific-disclosures	302-1 Energy consumption within the organisation	‘Environment’ table above page 42 a. 294.47 GJ – converted from MWh figure in Carbon Data table b. 41 MJ – converted from MWh figure in Carbon Data table c.i. 31 MWh (114 GJ) – in Carbon Data table ii. 0 UPP do not purchase heat ciii: 0 UPP do not purchase cooling civ: 0 UPP do not purchase steam d. Not applicable: no electricity, heating, cooling or steam sold e. 408.254 GJ, converted from kWh and MWh in Carbon Data f. GHG Protocol applied g. UK Government GHG Conversion Factors for Company Reporting Environment chapter, Energy & Carbon
		302-2 Energy consumption outside of the organisation	Not applicable we do not undertake this activity
		302-3 Energy intensity	a. 3277 b. Room c. Gas and power d. Within only

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Energy & Emissions			
GRI 302: Energy 2016	2016 Topic specific-disclosures	302-4 Reduction of energy consumption	a. NA kWh 354 644 kWh b. Gas and power c. Year on year d. Total consumption model
		302-5 Reductions in energy requirements of products and services	a-c. Not applicable: UPP does not sell products or services

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Water			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive summary: Our ESG Goals page 4 Assessing Our Performance, Environment, pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitments	Our Policies - UPP Ltd Executive Summary, ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Environment, pages 10-12
		3-3d-e Management of topic and impacts	Executive summary: Our ESG goals – page 4 Di, ii, iii: Assessing Our Performance, Environment, pages 10-12 Ei: Appendix 3: ESG Data and GRI Index, page 6 Eii: Progress Tables, pages 5-9 Eiii: Appendix 3: ESG Data and GRI Index, page 6
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI 303: Water and Effluents 2018	Topic specific-disclosures	303-1 Interactions with water as a shared resource	a. Water is sourced from regulated suppliers in the UK. It is disposed of in the same manner b. UPP base the impact of water consumption on resource use and carbon emissions c. UPP implements a water management plan, including metering and targeted actions such as repair and PPM of key aspects d. UPP aims to reduce below expected leakage rates
		303-2 Management of water discharge-related impacts	a. Based on the specific requirement of each water treatment provided under contract
		303-3 Water withdrawal	3 Water withdrawal a. Not applicable (see 'd' below) b. Not applicable (see 'd' below) c. Not applicable (see 'd' below) d. D. UPP does not directly withdraw water on any site
		303-4 Water discharge	ai – iii: Not applicable iv: 1,226 bi: 100% c: 0 water is not discharged but passed to water treatment company d: Not applicable no priority substances of concern e: UPP is a residential services provider and does not discharge any hazardous materials
		303-5 Water consumption	a. 1,226 b. 750 c. no water is stored d. Full Methodological Note

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Waste			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitments	Our Policies – UPP Ltd Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12
		3-3d-e Management of topic and impacts	di. UPP conducted a materiality assessment, which forms the basis of the aspects and impacts assessment within the ISO14001 certificated environmental management system dii. aspects are prioritised against a risk scoring – impact and severity – within the A&I register diii. The systems are implemented by the Director of Energy and Environmental Sustainability. It is externally certified by BSI. e. Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI: 306 Waste 2020	Topic specific-disclosures	306-1 Waste generation and significant waste-related impacts	ai. Provision of residential services, including maintenance, operation and decommissioning of buildings and the facilities within ii. Waste activities are present through UPP’s own activities and throughout the supply chain
		306-2 Management of significant waste-related impacts	A. Behavioural change programme with residents to encourage recycling and reuse B. Duty of care audits are conducted on third parties on a regular basis C. Waste data is provided by waste contractors under contract. This is collected by weigh scales on collection apparatus
		306-3 Waste generated	a. Waste data table, Appendix, Energy, page 13 b. Aggregated waste removal based on contractor reports
		306-4 Waste diverted from disposal	a. 3055 this includes all waste not sent to landfill. b. Not applicable data included for ‘d’ as per below, data still unavailable for ‘b’ and will be explored in future reports. c. 3055 this includes all waste not sent to landfill. di. 1260 dii. 1783 diii: Not applicable e. waste data is provided by waste contractors under contract. This is collected by weigh scales on collection apparatus
		306-5 Waste directed to disposal	a. 12.139 breakdown available: Waste Data (PP50) bi: 0 bii: 0 biii: 12.139 biv: 0 ci-iv: 0 di. 0 dii: 12.139 e. waste data is provided by waste contractors under contract. This is collected by weigh scales on collection apparatus

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Biodiversity			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitments	UPP Biodiversity Policy Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Environment, pages 10-1
		3-3d Management of topic and impacts	di. UPP conducted a materiality assessment, which forms the basis of the aspects and impacts assessment within the ISO14001 certified environmental management systems. dii. aspects are prioritised against a risk scoring – impact and severity – within the A&I register. diii. The system is implemented by the Director of Energy and Environmental Sustainability. It is externally certified by BSI. e. Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12
		3-3f Engagement with stakeholder	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
		304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected area	N/A – data is still unavailable and will be explored in future reports.
GRI 3: Biodiversity 2016	Topic specific-disclosures	304-2 Significant impacts of activities, products and services on biodiversity	Ai: Not applicable – UPP does not conduct these activities. Aii: Not applicable – UPP does not conduct these activities. Aiii: Not applicable – UPP does not conduct these activities. Aiv: Not applicable – UPP does not conduct these activities. Av: Not applicable – UPP does not conduct these activities. Avi: Not applicable – UPP does not conduct these activities. Bi: not available at the time of the report Bii: 73.39 ha. completed the delivery of 5.68 Biodiversity units above baseline across the estate according to the Natural England Metric 4.0 Biii: 30 years Biv: revers
		304-3 Habitats protected or restored	a. 73.39 ha. The success of the restoration was approved by Urban Wilderness (see UPP website) b. Yes, with relevant SPV directors c. Habitat baseline of 214.54 d. Natural England Biodiversity Net Gain Metric 4.0
		304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	a. Information not available at the time of the report

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Sustainable Building Design			
Material topics: sustainable building design	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12 Materiality and stakeholder engagement
		3-3c Policies or commitments	Our Policies – UPP Ltd Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Environment, pages - 12
		3-3d-e Management of topic and impacts	di. UPP conducted a materiality assessment, which forms the basis of the aspects and impacts assessment within the ISO14001 certified environmental management systems dii. aspects are prioritised against a risk scoring – impact and severity – within the A&I register diii. the system is implemented by the Director of Energy and Environmental Sustainability. It is externally certified by BSI e. Executive Summary ESG Goals, page 4 Assessing Our Performance, Environment, pages 10-12
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
Own disclosures	Sustainability certification	Percentage of portfolio which is BREEAM rated	11% DBFO rooms

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Health & Safety			
GRI 3: Material Topics 2021	3-3 Management of material topic	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Health Safety and Wellbeing, page 13 Materiality and stakeholder engagement Appendix 3, Health, Safety, and Wellbeing, page 24
		3-3c Policies or commitments	Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Health Safety and Wellbeing, page 13 Materiality and stakeholder engagement Appendix 3, Health, Safety, and Wellbeing, page 24
		3-3d-e Management of topic and impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Health Safety and Wellbeing, page 13 Materiality and stakeholder engagement Appendix 3, Health, Safety, and Wellbeing, page 24
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI 3: Occupational Health and Safety 2018	Topic specific-disclosures	403-1 Occupational health and safety management system	Assessing Our Performance, Health Safety and Wellbeing, page 13 Appendix 3, Health, Safety, and Wellbeing, page 24 b. The scope of UPP's Safety and Health Management System covers anyone working on any UPP site including volunteers, apprentices and those on work experience, it applies to corporate services and SVPs
		403-2 Hazard identification, risk assessment, and incident investigation	Assessing Our Performance, Health Safety and Wellbeing, page 13 Appendix 3, Health, Safety, and Wellbeing, page 24
		403-3 Occupational health services	Appendix 3, Health, Safety, and Wellbeing, page 24
		403-4 Worker participation, consultation, and communication on occupational health and safety	Appendix 3, Health, Safety, and Wellbeing, page 24
		403-5 Worker training on occupational health and safety	Appendix 3, Health, Safety, and Wellbeing, page 24

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Health & Safety			
GRI 3: Occupational Health and Safety 2018	Topic specific-disclosures	403-6 Promotion of worker health	Assessing Our Performance, Health Safety and Wellbeing, page 13 Appendix 3, Health, Safety, and Wellbeing, page 24
		403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Safety, Health, and Environment Policy Statement
		403-8 Workers covered by an occupational health and safety management system	Safety, Health, and Environment Policy Statement a. We have implemented an occupational health and safety management system which is based on legal requirements and also complies with the requirements of ISO45001:2018. Our compliance with ISO45001:2018 is externally accredited by BSI (British Standards Institution). The system is available to all colleagues via UPP's Intranet Campus and it applies to all employees and non-employees a i,ii,iii. Information unavailable. While we capture contractor and agency incidents, we do not have access to contractor hours worked therefore we limit reporting to UPP employees to ensure the rigor of the data b. Contractor and agency workers are excluded from this disclosure as outlined in a i, ii, iii above c. The UPP Internal Adverse Event Reporting System (AERS) is used to record all adverse events across the business. This system has been in place since September 2021 and is used to record all adverse events involving employees, students and visitors. The recordable injuries which have been included in the data in this report are accidents which have resulted in first aid treatment or more serious medical treatment
		403-9 Work-related injuries	a.b. Appendix 3, Health, Safety, and Wellbeing, page 24 c. Not Applicable: our risk assessments have not highlighted risks that would be considered to pose a risk of high-consequence injury or ill-health d. We have risk assessments that have been completed centrally for the organisation. These assessments do not highlight any risk that would be considered to pose a risk of high-consequence injury or ill-health as we understand the definition and examples that are provided withing GRI-403 From a health and safety view our operations are medium to low risk e. We have used 1,000,000. We only report on employees therefore contractors, agency staff have been excluded from the figures provided f. No workers have been excluded g. The assumption that is used is that the number of staff employed doesn't change throughout the academic year
		403-10 Work-related ill health	Not applicable: our risk assessments have not highlighted risks that would be considered to pose a risk of high-consequence injury or ill-health

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topics: Health & Safety			
Material Topics: Student Wellbeing & Experience			
Own disclosures		Percentage of colleagues that participate in first aider mental health training	9%
		Percentage of colleagues that participate in mental health awareness and resilience training	9%
		Percentage of colleagues who undergo well person checks	25%
		Student wellbeing – resident response to whether they belong to a residential community	70.4% – student residents at six sites were polled Appendix 3, Health, Safety, and Wellbeing – student wellbeing and belonging, page 28

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Inclusion & Diversity			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, EDI page 14/ Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, EDI page 14 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, EDI page 14 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI 3: Diversity & Equal Opportunity 2016		405-1 Diversity of governance bodies and employees	Appendix 3, Equity, Diversity, and Inclusion, page 18
		405-2 Ratio of basic salary and remuneration of women to men	Appendix 3, Equity, Diversity and Inclusion, page 18

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Responsible Supply Chain			
Material Topics: Responsible supply chain management	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Reporting of impacts Executive Summary ESG Goals, page 4 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI 3: Procurement practices 2016	Topic specific-disclosures	204-1 Proportion of spending on local suppliers	a. 28% b. Local suppliers are defined as those registered in the same county as our UPP sites or within a 75-mile radius of the service delivery site. c. UPP's sites with our 15 University Partners and two administrative offices in London and Nottingham

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Community Engagement			
GRI 3: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Community, page 14 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Community, page 14 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Community, page 14 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
Own disclosures		Social value	Executive Summary ESG Goals, page 4 Assessing Our Performance, Community, page 14 Appendix 3, Social Value Methodology, page 14

Material topics: responsible supply chain management

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topics: Responsible Supply Chain Management			
GRI 3: Material Topics 2021	GRI 3: Material Topics 2021	3-3a-b Description and reporting of impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary ESG Goals, page 4 Progress Tables, pages 5-9 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary ESG Goals, page 4 Assessing Our Performance, Ethical Procurement, page 17 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI Content Index
GRI 3: Procurement practices 2016	Topic specific-disclosures	204-1 Proportion of spending on local suppliers	a. 28% b. Local suppliers are defined as those registered in the same county as our UPP sites or within a 75-mile radius of the service delivery site. c. UPP's sites with our 15 University Partners and two administrative offices in London and Nottingham

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Employee Standards			
GRI: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary, ESG Goals, page 4 GRI: Material Topics 2021 Assessing our Performance, page 9-10, Appendix pages 6 & 21 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary, ESG Goals, page 4 Progress Tables, pages 5-9 Assessing our Performance, page 9-10, Appendix pages 6 & 21 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary, ESG Goals, page 4 Assessing our Performance, page 9-10, Appendix pages 6 & 21 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI content index

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Business Standards			
GRI: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary, ESG Goals, page 4 GRI: Material Topics 2021 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary, ESG Goals, page 4 Progress Tables, pages 5-9 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary, ESG Goals, page 4 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI content index

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Corporate Governance			
GRI: Material Topics 2021	3-3 Management of material topics	3-3a-b Description and reporting of impacts	Executive Summary, ESG Goals, page 4 GRI: Material Topics 2021 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3c Policies or commitments	Executive Summary, ESG Goals, page 4 Progress Tables, pages 5-9 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3d-e Management of topic and impacts	Executive Summary, ESG Goals, page 4 Assessing our Performance, page 12, Appendix 1 page 4 Materiality and stakeholder engagement
		3-3f Engagement with stakeholders	Refer to 3-3f Engagement with stakeholders in Climate Change table of GRI content index

GRI Standard	Topic	Disclosure	Location and comments
General Disclosures			
Material Topic: Political Safeguards			
GRI: Material Topics 2021	3-3 Management of material topics	NA Disclosure not applicable as UPP does not undertake political activity	

Appendix 5: Assurance Statement



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Independent Assurance Statement to UPP

FBRH Consultants Ltd (FBRH Consultants) was engaged by UPP to provide independent limited assurance over the presentation of information in its **2025 Annual Sustainability Report** (the Report), covering the period from **1st September 2023 to 31st August 2024** (FY 2023/24).

FBRH Consultants is an independent provider of sustainability assurance services and has not carried out any other work for UPP during the reporting period that could affect our independence or objectivity.

Engagement Summary

• Scope of the engagement:

To assess whether the Report is presented in accordance with the **GRI Sustainability Reporting Standards** (GRI Standards), specifically ensuring that the disclosures and information listed in **Appendix I** have been appropriately presented based on the requirements of the GRI Standards.

• Reporting criteria:

The GRI Sustainability Reporting Standards (2021 update)

• Assurance standard:

International Standard on Assurance Engagements (ISAE) 3000 (Revised)

• Assurance level:

Limited assurance

• Responsibilities:

UPP is responsible for the preparation of the Report and the collection and presentation of the information within it. FBRH Consultants' responsibility is to express a limited assurance conclusion based on the scope of work described above.

Our Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention to suggest that the information and disclosures, as defined in the scope of our engagement, have not been presented in accordance with the GRI Standards.

Work Performed

Our assurance work was conducted in accordance with ISAE 3000 (Revised) and involved the following activities:

- Review of the final version of the Report to confirm that the required disclosures, as per the GRI Standards, have been presented appropriately;
- Evaluation of the structure and content of the Report for consistency with GRI requirements;
- Examination of the GRI content index and cross-checking of selected disclosures to ensure that references are correctly aligned;

We did not verify the accuracy of data or perform data sampling or site visits. Our work did not include assurance of performance metrics or quantitative data.

Limitations

This assurance engagement was limited to a review of the presentation of information in accordance with the GRI Standards and did not include verification of underlying data or assessment of the effectiveness of management systems or internal controls. The inherent limitations of assurance engagements and the use of sampling and selective review methods mean that absolute assurance cannot be provided.

Simon Pitsillides MBA, FCIM, FIEMA
GRI Nominated Trainer, IEMA Trainer
GRI Certified Sustainability Professional
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Appendix I: Scope of our assurance engagement

General Disclosures

Disclosure #	Disclosure Title
2-1	Organizational details
2-2	Entities included in the organization's sustainability reporting
2-3	Reporting period, frequency and contact point
2-4	Restatements of information
2-5	External assurance
2-6	Activities, value chain and other business relationships
2-7	Employees
2-8	Workers who are not employees
2-9	Governance structure and composition
2-10	Nomination and selection of the highest governance body
2-11	Chair of the highest governance body
2-12	Role of the highest governance body in overseeing the management of impacts
2-13	Delegation of responsibility for managing impacts
2-14	Role of the highest governance body in sustainability reporting
2-15	Conflicts of interest
2-16	Communication of critical concerns
2-17	Collective knowledge of the highest governance body
2-18	Evaluation of the performance of the highest governance body
2-19	Remuneration policies
2-20	Process to determine remuneration
2-21	Annual total compensation ratio
2-22	Statement on sustainable development strategy
2-23	Policy commitments
2-24	Embedding policy commitments
2-25	Processes to remediate negative impacts
2-26	Mechanisms for seeking advice and raising concerns
2-27	Compliance with laws and regulations
2-28	Membership associations
2-29	Approach to stakeholder engagement
2-30	Collective bargaining agreements

GRI 305-5	Reduction of GHG emissions
GRI 305-6	Emissions of ozone-depleting substances (ODS)
GRI 305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions
GRI 306-1	Waste generation and significant waste-related impacts
GRI 306-2	Management of significant waste-related impacts
GRI 306-3	Waste generated
GRI 306-4	Waste diverted from disposal
GRI 306-5	Waste directed to disposal
GRI 403-1	Occupational health and safety management system
GRI 403-2	Hazard identification, risk assessment, and incident investigation
GRI 403-3	Occupational health services
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety
GRI 403-5	Worker training on occupational health and safety
GRI 403-6	Promotion of worker health
GRI 403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
GRI 403-8	Workers covered by an occupational health and safety management system
GRI 403-9	Work-related injuries
GRI 403-10	Work-related ill health
GRI 405-1	Diversity of governance bodies and employees
GRI 405-2	Ratio of basic salary and remuneration of women to men

Requirements	Title
GRI 1	Foundation 2021

Disclosures	Disclosure Title
3-1	Process to determine material topics
3-2	List of material topics
3-3	Management of material topics

Topic-Specific Disclosures

Disclosure #	Disclosure Title
GRI 204-1	Proportion of spending on local suppliers
GRI 302-1	Energy consumption within the organization
GRI 302-2	Energy consumption outside of the organization
GRI 302-3	Energy intensity
GRI 302-4	Reduction of energy consumption
GRI 302-5	Reductions in energy requirements of products and services
GRI 303-1	Interactions with water as a shared resource
GRI 303-2	Management of water discharge-related impacts
GRI 303-3	Water withdrawal
GRI 303-4	Water discharge
GRI 303-5	Water consumption
GRI 304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas
GRI 304-2	Significant impacts of activities, products and services on biodiversity
GRI 304-3	Habitats protected or restored
GRI 304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations
GRI 305-1	Direct (Scope 1) GHG emissions
GRI 305-2	Energy indirect (Scope 2) GHG emissions
GRI 305-3	Other indirect (Scope 3) GHG emissions
GRI 305-4	GHG emissions intensity

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