



# ANTI-MODERN SLAVERY STATEMENT 2025

——— Published 2025

**UNILODGE**  
——— LIVING GROUP

# Covering note from the Chief Executive Officer



I am pleased to present UniLodge Living Group's first Anti-Modern Slavery Statement covering the financial year 2025 reporting period. This statement has been formally reviewed and approved by the Board, demonstrating our unwavering commitment to identifying, assessing, and addressing modern slavery risks across our operations and supply chains, in line with our obligations under the Modern Slavery Act 2018 (Cth). We recognise that modern slavery is a serious violation of human rights and that combating it is essential to ensuring ethical, transparent, and sustainable business practices.

Tomas Johnsson  
Chief Executive Officer  
22 December 2025

# OUR BRANDS



# OUR EXPERTISE

29

Years

For almost three decades UniLodge Living Group has been shaping how people live.

2

Countries

We operate and manage properties in Australia and New Zealand, with exciting growth coming.

17

Locations

All mainland states and territories of Australia Both the North and South Islands of New Zealand.

150+

Properties

150+ properties and counting, expertly managed for every resident.

5

Brands

UniLodge, Student Living by UniLodge, Hive, Essence Communities, Essence Hotels and Apartments.

1,300

Team Members

Our global team of almost 1,300 professionals are dedicated to ensuring care, respect and reliability in every interaction.

43,494

Residents

People from Australia, New Zealand and many overseas countries call a UniLodge Living Group residence home.

1

Vision

To creating connected, thriving communities through bespoke solutions for the living sector.

# INTRODUCTION



**The Australian Modern Slavery Act 2018** (the Act) defines modern slavery as situations where coercion, threats or deception are used to exploit victims and undermine them of their freedom. It is used to describe eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

This Anti-Modern Slavery Statement has been prepared in accordance with the Act's requirements. It is UniLodge Holding's first statement and covers the reporting period from 1 July 2024 to 30 June 2025.

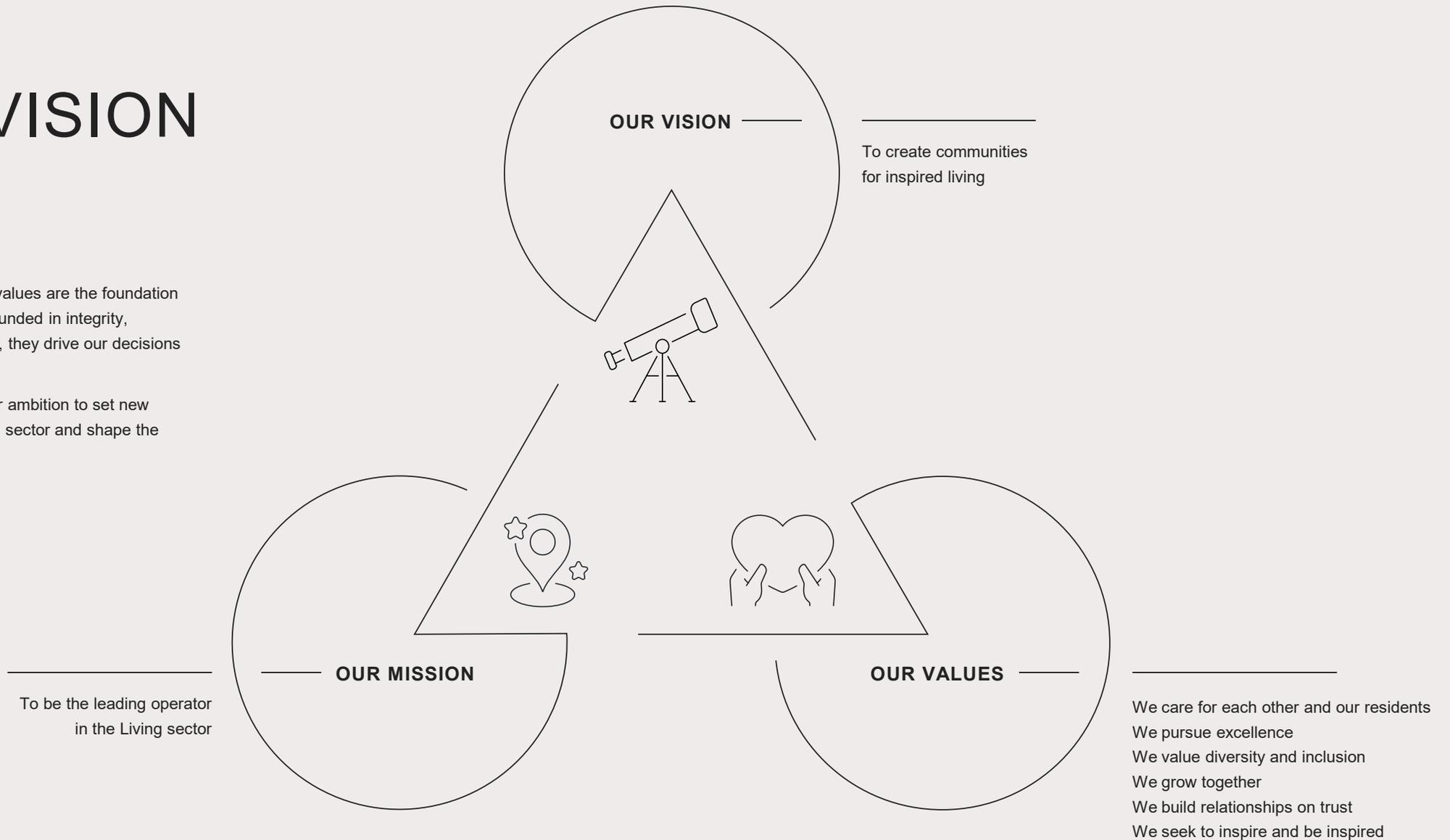
UniLodge Holdings Pty Ltd recently met the mandatory reporting threshold under the Modern Slavery Act, making this our first formal anti-modern slavery statement. Contained below, we follow the seven mandatory reporting criteria to outline the actions taken during the reporting period to understand and mitigate those risks, and to uphold our commitment to respecting

human rights. More broadly, UniLodge Living Group is committed to proactively identifying, assessing, and addressing the risks of modern slavery across our operations and supply chains.

# OUR VISION

Our vision, mission and values are the foundation of everything we do. Grounded in integrity, inclusion and community, they drive our decisions and shape our future.

Together, they define our ambition to set new benchmarks in the Living sector and shape the future of urban living.



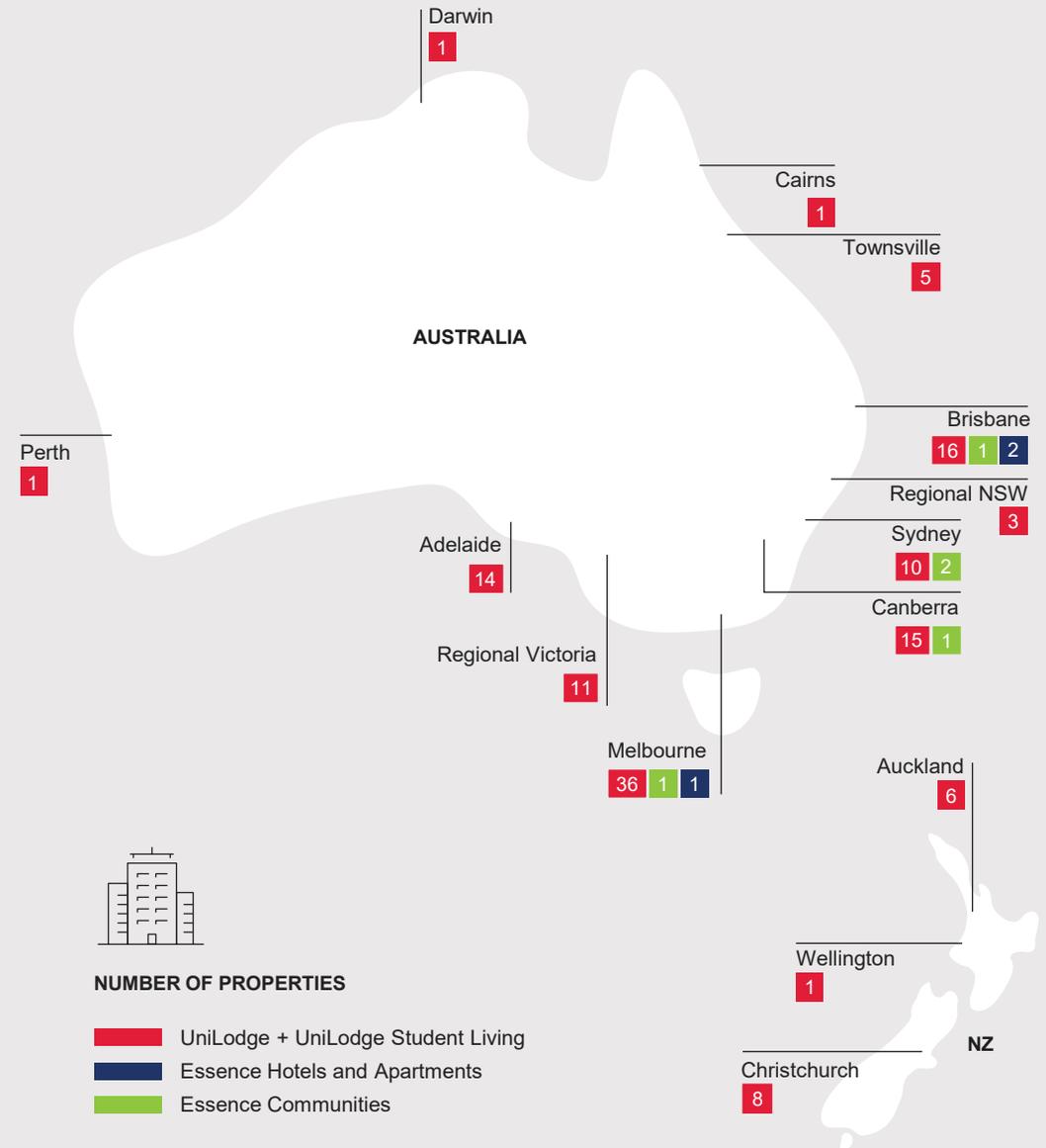
# REPORTING ENTITY

UniLodge Holdings Pty Ltd (ABN 56 143 599 759) is our reporting entity and includes five brands: UniLodge, Student Living by UniLodge, Essence Communities, Essence Hotels & Apartments, and Hive (collectively known as the 'UniLodge Living Group'). These five brands provide accommodation solutions for the Student Accommodation, Strata, and Build-to-Rent sectors across Sydney, Melbourne, Brisbane, Adelaide, Canberra, Perth, Darwin, and more regional cities like Cairns, Townsville, and Bendigo.

UniLodge Holdings Pty Ltd incorporates a number of subsidiary companies including UniLodge Australia Pty Ltd and Essence Communities Pty Ltd.

UniLodge Living Group was founded in 1996 and operates independently as a private entity.

REGIONAL OFFICES	FTE	BEDS
Victoria	349	6,000
NSW	164	1,000
Queensland	125	4,000
ACT	200	5,000
North Queensland/Darwin	85	803
Western Australia	6	1,200
South Australia	45	3,000
New Zealand	167	1,000



# OUR STRUCTURE



UniLodge and its subsidiaries are governed by one Board of Directors, and operations are overseen by one Executive Group. Each region within the UniLodge Living Group portfolio is managed by a Regional General Manager, and Property Managers and their teams are based at each property. These teams are supported by our Head Office located in Brisbane, Queensland.

All brands have the same business model and often use shared management resources for marketing, health and safety, operation coordination, human resources, finance, and training and development.

For the purposes of the Act in terms of approving an anti-modern slavery statement, the Board of Directors is the 'principal governing body' of the company.

## Subsidiary entities

### UniLodge Australia Pty Ltd (ABN 49 078 921 169)

Through its principal operating entity, UniLodge Australia Pty Ltd (and its Student Living Brand) manages more than 110 properties in partnership with many of Australia and New Zealand's universities and tertiary education providers. These partnerships include both university-owned and privately owned buildings, where UniLodge delivers end-to-end services including facility management, tenancy management, residential life programs, and wellbeing initiatives designed to support student communities.

Through subsidiary companies of UniLodge Australia Pty Ltd, our Essence Hotels & Apartments brand provides fully furnished, flexible accommodation in Brisbane and Melbourne, catering to business, medical, and leisure travelers. Hive is a recent brand acquisition, offering purpose-built, fully furnished

housing near universities and medical education facilities, with properties located across Brisbane's inner suburbs.

### Essence Communities (56 639 534 740)

Essence Communities is focused on managing Build-to-Rent (BTR) residential assets.

Governing Body

Board of Directors

Reporting Entity  
UniLodge Holdings Pty Ltd

**UNILODGE**  
LIVING GROUP

**UniLodge**

**StudentLiving<sup>®</sup>**  
by UniLodge

 **essence**  
COMMUNITIES

**essence**  
HOTELS & APARTMENTS

**hive**

# OUR OPERATIONS



UniLodge Living Group collaborates with universities, educational institutions and private investors to offer housing solutions that meet the needs of students.

- **Variety of Living Options:** including studio apartments, shared apartments, and townhouses for both international and domestic students
- **Fully Furnished Rooms:** all properties are equipped with essential furnishings and appliances such as beds, desks, refrigerators and microwaves
- **All-Inclusive Utilities:** many accommodations include utilities such as electricity, water and internet within the rent
- **On-Site Staff Support:** resident advisors and community managers to assist students with any concerns or needs
- **Maintenance Services:** maintenance

services provided to address any issues within accommodation

- **Social and Cultural Activities:** Regularly organised events and activities for students to build connections and engage with peers
- **Communal Facilities:** Our properties often include communal amenities such as gyms, swimming pools, saunas, study rooms, and BBQ areas, designed to promote wellbeing, and community engagement.

# SUPPLY CHAINS



UniLodge Living Group procures a wide range of products and services necessary to support the functions of the company. This is guided by our Sustainable Procurement Policy.

UniLodge Living Group works with a broad network of suppliers across all its brands, with over 95% of its direct (Tier 1) supply chain based in Australia and New Zealand. While the majority of our Tier 1 supply chain is locally based, we also engage a small number of international suppliers.

Asset owners have the authority to engage their own services without first consulting us and therefore we do not have a direct view of the scope and the service of those providers' processes.

Our indirect suppliers (Tier 2 and beyond) are likely more globally diverse beyond Australia, particularly for our purchased products, but this requires further investigation to confirm.

The nature and structure of our operations and supply chain inform our initial assessments of modern slavery risks, as outlined in the following section.

	<p>Top Source Countries by Spend (Tier 1 suppliers)</p>	<ul style="list-style-type: none"> <li>• China</li> <li>• Pakistan</li> <li>• Malaysia</li> <li>• Philippines</li> </ul>
	<p>Key Sourcing Industries (Tier 1 suppliers)</p>	<ul style="list-style-type: none"> <li>• Apparel &amp; Textiles</li> <li>• Homeware</li> <li>• Furniture &amp; Furnishings</li> </ul>
	<p>Key Sourcing Products (Tier 1 suppliers)</p>	<ul style="list-style-type: none"> <li>• Staff Uniforms</li> <li>• Mattress Protectors</li> <li>• Shower Curtains</li> <li>• Kitchenware</li> <li>• Beds and mattresses</li> <li>• Desks and chairs</li> </ul>

# MODERN SLAVERY RISK ASSESSMENT



We recognise that modern slavery risks can exist in our operations and supply chains, particularly in the sourcing of goods and services associated with the operation of residential accommodation.

While nearly all our Tier 1 suppliers are based in Australia and New Zealand, we recognise that domestic sourcing does not eliminate the potential for modern slavery risks for two reasons. First, we acknowledge that modern slavery exists within Australia's borders, and that risk factors increase through subcontracting arrangements, low-wage labour markets, and the use of migrant or vulnerable workers in sectors such as cleaning, maintenance, and construction. Second, many of our Tier 1 suppliers may be procuring and selling products with value chains tracing outside Australia, likely mostly into Asia.

UniLodge Living Group has identified, at a high-level, sectors containing greater risk within our supply chain by referencing international human

rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Fundamental Principles and Rights at Work, and the Global Slavery Index.

The relevant riskier sectors for us include:

- Textiles and apparel (e.g. staff uniforms, mattress protectors, shower curtains)
- Furniture and furnishings (e.g. beds, desks, chairs, lighting)
- Cleaning and Facilities Services (e.g. contracted cleaning, security, waste management)
- Homeware and consumables (e.g. kitchenware)
- Construction & Property Development (e.g. contractors for building, renovating, or repairing new student accommodation facilities)

As mentioned, many of these products or their contained materials come from countries with higher modern slavery risk profiles than Australia, including Bangladesh, India, China and Vietnam. This is true even when procured

through local (Australian or New Zealand-based) suppliers. This geographic disconnect between procurement and source presents an increased risk of exploitative labour practices deeper in the supply chain.

# MODERN SLAVERY RISK ASSESSMENT (contd.)



At present, our visibility and risk assessment processes are focused on Tier 1 suppliers. We currently have limited visibility of Tier 2 and lower-tier suppliers, where modern slavery risks are often more difficult to identify and address. We recognise this lack of transparency and are working to improve this through better research and collaboration with key suppliers.

Within our own operations, we consider the risk of modern slavery to be low, due mostly to the nature of our business (accommodation services) and the strong regulatory environment we operate in. However, we acknowledge that operational risks may still arise, particularly through contracted services such as construction and facilities management.

Our initial supplier risk assessment was fairly high-level, meaning further work is required to gain transparency over our supply chain slavery risks. However, the initial assessment has given us a good starting point for this first statement and clarifies where we need to go from here. As

part of our continuous improvement efforts, we plan to begin a more detailed supply chain risk assessment in FY26, with a systematic review of all Tier 1 suppliers to identify high-risk areas by sector, geography, and product type. Over time, we aim to extend this analysis to Tier 2 and beyond for a more comprehensive view of our supply chain risks.

# ACTION



UniLodge Living Group has implemented a suite of measures to assess and address modern slavery risks in its operations and Tier 1 supply chain. These measures are guided by our Modern Slavery Policy and Human Rights Policy, which set out our commitment to implementing the UNGPs and the OECD Guidelines for Multinational Enterprises, the Voluntary Principles on Security and Human Rights (Voluntary Principles) and the IFC performance standards.

To support implementation, all managers complete mandatory anti-modern slavery training that outlines what modern slavery is, how to recognise risk indicators, and how to raise concerns. Awareness of modern slavery risks is also embedded in the employee induction processes.

When engaging new suppliers or renewing contracts, contractors and service providers must either provide their Modern Slavery Policy or formally agree to comply with ours. They must

also complete a due diligence questionnaire covering key areas such as ethical labour practices, workplace health and safety, and adherence to our Supplier Code of Conduct.

Operational managers review submitted documentation to identify potential risks. Where a risk is identified, it is escalated to the Executive Team for investigation. Mitigation actions may include suspending the contract until the investigation is complete, conducting targeted audits, or appointing a third party to facilitate remediation.

As a form of due diligence, we have implemented a feedback mechanism, such as an anonymous feedback box for cleaning staff, allowing concerns to be raised and escalated by property managers.

Our Whistleblower Policy supports confidential and anonymous reporting of modern slavery concerns by employees, contractors, or third parties. All reports are investigated thoroughly,

with remediation initiated where necessary.

In cases where we have limited procurement control, such as prior to building handover, we proactively seek contractor information from the asset owner. If a modern slavery or human rights issue is identified after operations commence, we notify the asset owner immediately and activate our internal remediation protocols.

# ACTION (contd.)



We currently have no formal human rights due diligence or remediation process, with issues handled on a case-by-case basis. However, we see the value in these processes and intend to close these gaps with time.

<b>Planned Action</b>	<b>Target Completion</b>
Finalise and implement UniLodge Living Group Procurement Policy	FY26
Conduct Tier 1 Supplier Risk Assessment	FY26
Make Key Policies Publicly Available	FY26
Establish UniLodge Living Group Human Rights Committee or Working Group	FY27
Conduct Tier 2 Supplier Risk Assessment	FY27
Establish Group-wide Human Right Due Diligence Processes	FY26
Develop Formal Remediation Process	FY27

# ASSESSING EFFECTIVENESS



UniLodge Living Group recognises the importance of evaluating whether our actions effectively identify and address modern slavery risks within our supply chain. As this is our first statement, we are in the process of establishing an effective review and assessment framework. Without an existing benchmark, we are focused on developing fit-for-purpose processes to support initial implementation and ongoing improvement.

To reinforce this, we are developing measurable performance indicators and contract clauses to monitor our supplier practices using data driven insights. This will help identify trends, highlight areas of increased risk, and inform adjustments to contractual and training requirements.

We are also exploring the use of anonymous contractor surveys focused on anti-modern slavery practices. These surveys will help us assess the real-world impact of our actions, gather candid feedback from contractors, and evaluate the effectiveness of any changes made

in response to identified risks.

Additionally, we regularly review our controls through a risk management lens to determine whether they are achieving the intended outcomes or introducing new risks. Feedback from employees across different roles supports this process and helps ensure a well-rounded and informed evaluation.

# CONSULTATION WITH SUBSIDIARY ENTITIES



UniLodge Living Group is governed by one Board of Directors, with operations overseen by one Executive Group; therefore, key policies, procedures, and processes are shared by all entities.

UniLodge Living Group has the same business model across all entities and often use shared management resources for marketing, health and safety, operation coordination, human resources, and finance. Executive General Managers for key parts of the business, along with Regional General Managers leading geographic areas has enabled closer engagement with asset owners and suppliers. As these relationships grow stronger and more information becomes available to us, these senior roles will become pivotal when consulting on managing modern slavery risks.

While individual department heads do not formally review the statement, key inputs were drawn from their respective areas and our senior leaders across the business. The Executive Team will review the final statement before Board approval.

# CASE STUDY



UniLodge Living Group requires all cleaning contractors to demonstrate compliance with anti-modern slavery practices by submitting relevant policies as part of their tender. The selection panel reviews these policies, and any concerns are addressed during the evaluation process. For the successful tenderer, these policies are embedded in the contract, and they must notify UniLodge Living Group of any changes.

Following a reported incident of underpayment, UniLodge Living Group implemented ad-hoc payroll audits. These audits involve randomly selected contractor employees reviewing their pay slips to confirm correct pay rates and superannuation contributions.

This ad-hoc audit commenced in July 2025.

# APPROVAL



This report was reviewed and endorsed on 22 December 2025 by the UniLodge Holdings Pty Ltd Board of Directors, the group's highest governing body, and is signed on the Board's behalf of by the Executive Chairman of the Board.

A handwritten signature in blue ink that reads "Peter Bates".

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Peter Bates  
Executive Chairman  
22 December 2025