



Modern Slavery Act 2015

Modern Slavery and Human Trafficking Statement

1. Introduction

The Modern Slavery Act 2015 (the Act), recognises slavery, servitude, forced or compulsory labour, and human trafficking as a crime and a violation of fundamental human rights.

SRUC acknowledges its responsibilities under the Modern Slavery Act and, in line with Section 54, sets out the following statement outlining the steps taken during 2024/25 and those planned for the future to prevent modern slavery and human trafficking within the organisation and its supply chains.

2. About SRUC

SRUC is a private company limited by guarantee, registered in Scotland (Company Number: SC103046), and holds charitable status (Charity Number: SC003712). The SRUC Board of Directors oversees the organisation's financial management and ensures compliance with the Financial Memorandum and related guidance issued by the Scottish Funding Council (SFC).

SRUC's core charitable activities are delivered through this company, while commercial operations are carried out by its wholly owned subsidiary, SAC Commercial Limited.

SRUC delivers innovative and progressive research and education, business support and consultancy services for Scotland's rural industries, and associated food and drink sector.

Our Vision

To be Scotland's enterprise university at the heart of our sustainable natural economy.

Our Mission

Creating and mobilising knowledge and talent. Partnering locally and globally to benefit Scotland's natural economy.





Our Values

Respect - we will recognise that everyone in the organisation makes a contribution to our success.

Innovate - we don't wait for things to happen, we constructively challenge how things are done.

Support - we look beyond the boundary of our own roles to support others and share knowledge.

Excel - we take pride in contribution, we have high standards of excellence and always work to our core values.

3. Our Statement

SRUC is committed to ensuring that modern slavery and human trafficking is not taking place in any part of its operational activities or within its supply chains. We are committed to protecting and respecting human rights across SRUC's activities, and will take where reasonable, appropriate and possible, steps to influence others to ensure slavery and human trafficking does not take place.

Our suite of Human Resources Policies confirm our commitment to workplace rights for employees and we promote our Dignity At Work Policy and Equal Opportunities Policy to ensure an environment based on self-worth and respect, that does not condone or allow bullying, harassment, discrimination or any other form of unacceptable behaviour or unfair treatment. Additionally, our Bribery (Anti-Corruption) Policy and separate Whistleblowing Policy provide staff with the guidance and means to report improper conduct or unethical behaviour.

In compliance with the Procurement Reform (Scotland) Act 2014, SRUC's Annual Procurement Strategy, along with our Procurement and Sustainability Policy, set out our principles and approach to ensuring ethical and sustainable procurement. This includes

- support of international and locally proclaimed human rights;
- procurement of fairly and ethically produced products and fair working practices;
- promotion of the Living Wage;
- promotion of equal opportunity to eliminate discrimination, harassment and victimisation or any other prohibited conduct under the Equality Act 2010.





4. Our Supply Chain Spend

SRUC has relevant expenditure of approximately £40m across Goods, Services and Works. Our supply chains support the College under the following six main categories:

- Capital Works (including building construction and renovation);
- Estates, Buildings and Facilities Management (including maintenance, utilities, cleaning, catering, and waste);
- Laboratories (including consumables, chemicals and equipment);
- **Farms** (including purchase of livestock, feed, fertiliser, agricultural chemicals, vehicles and equipment);
- Information Systems (including desktop and laptop computers, servers, printers, mobile phones, and audio-visual equipment);
- Professional Services and HR (including temporary staffing).

5. Our Procurement Activity and Due Diligence

As highlighted in SRUC's most recently published <u>Annual Procurement</u> <u>Report</u>, 97% of goods and services are sourced from within Scotland (59%) and the wider UK (38%). This domestic focus contributes to a low overall risk of modern slavery within SRUC's direct operations and their associated supply chains.

However, we acknowledge that certain risks remain, particularly in relation to the global supply chains of products such as electronic equipment, clothing, and PPE. Broader global challenges such as climate change, the conflict-driven displacement of populations, and the associated rise in human exploitation and trafficking are also considered in our risk assessments.

To mitigate these risks, SRUC continues to increase its use of collaborative contracts awarded by <u>Advanced Procurement for Universities and Colleges (APUC)</u>, the Scottish Government, and other public sector centres of procurement excellence.

SRUC has adopted APUC's <u>Sustain Supply Chain Code of Conduct</u> for all regulated procurement processes, and when deemed appropriate below this threshold. The Code of Conduct requires all tenderers, as a contractual obligation, to commit along with SRUC to the principles of corporate social responsibility, sustainability and a pledge that each party shall:

- not used forced, involuntary or child labour;
- provide suitable working conditions and terms;





- treat employees fairly;
- ensure ethical compliance and support economic development;
- ensure environmental compliance.

The adoption of this Supply Chain Code of Conduct is mandated for all suppliers wishing to participate in a tender action led by SRUC's Procurement Team. In addition, consideration of the risk of Modern Slavery is included in all SRUC business cases requesting formal procurement action to be taken.

Where appropriate, SRUC will supplement its own efforts with activities already being progressed by APUC. See the current <u>APUC Modern Slavery and Human Trafficking Statement</u> and <u>Electronics Watch</u> for reference.

Every regulated procurement process, and when deemed appropriate below this threshold, requires tenderers (and any sub-contractor or supply partner on which they rely) to complete the Single Procurement Document (Scotland) (SPD).

The SPD requires tenderers to provide details about their trading activities, as well as their legal and environmental compliance. This includes disclosing whether the organisation, or any individual with decision-making authority within the organisation, has, within the past five years, been convicted of an offence under Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015, or any offence listed in the Schedule to that Act.

Any tenderer confirming such a conviction will be excluded from the procurement process unless they can clearly demonstrate that sufficient and appropriate remedial action has been taken to restore their reliability (a process known as self-cleansing).

6. Staff Training and Awareness

SRUC's Procurement Service is committed to ongoing training to meet Continuous Professional Development (CPD) standards. This includes completing key e-learning modules such as HEPA's A Guide to Modern Slavery, CIPS' Ethical Procurement and Supply, and APUC's Serious and Organised Crime. Procurement Service staff also regularly attend seminars covering a variety of relevant topics including, but not limited to, ethical procurement and supply chain risk.

To raise awareness across the whole organisation, SRUC utilises an online training course that explains the risks of modern slavery and what steps should be taken if a staff member suspects exploitation is taking place. All staff are required to complete this course on a regular basis.





This Statement was approved by SRUC's Executive Leadership Team, 25 August 2025

Prof. Wayne Powell, Principal and Chief Executive