

# Modern Slavery & Human Trafficking Statement

January 2026

# **Modern Slavery & Human Trafficking Statement**

#### Introduction

Founded in 1495, the University of Aberdeen is Scotland's third oldest university and the fifth oldest in the UK. The principle of serving the public good is enshrined in the University's founding purpose, to 'be open to all and dedicated to the pursuit of truth in the service of others' and its strategic vision <a href="Mailto:Aberdeen 2040">Aberdeen 2040</a>. In keeping with this principle, the University takes a zero-tolerance approach in relation to modern slavery and human trafficking in all its forms.

In line with our Sustainability Policy and related statements, we aim to set best practice standards meeting or surpassing the requirements of legislation and to work towards our organisational target of achieving Net Zero before 2040. For greater impact and socially responsible transformation, in line with the University' strategic vision 2040, we are committed to meeting the UN Sustainable Development Goals (SDGs) and report annually on our contribution towards these. These SDG related commitments, reflect a wider institutional commitment to act ethically, transparently and with integrity in all our business dealings and relationships, as evidenced extensively in our equalities and other related policies.

We are committed to establishing and maintaining effective systems and controls which ensure the University is not contributing to modern slavery in any way. Our Sustainable Investment Policy spells

out how we are aligning our investments with the UN Global Compact and ESG approaches to investment, and aiming to align academic institutions with the work of the UN Global Compact, the University of Aberdeen Business School is a signatory to the UN Principles for Responsible Management Education (PRME).

#### **Purpose of the Statement**

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the University has taken and will take to identify and prevent such practices from taking place in any of its supply chain and in any part of its own business.

#### **University Employees**

The University Human Resources Policies set out our commitment to workplace rights at the University. The risk of modern slavery occurring in the University's workforce is mitigated by ensuring that staff are recruited following robust recruitment policies. We are rigorous in checking that all new recruits on our home campuses have the right to work in the UK. We also employ all staff and workers (temporary services/casual staff) on standard terms and conditions of employment.

The University adheres to the Public Interest Disclosure Act 1998 and implements its own Whistleblowing Policy regarding concerns about potential corruption, fraud, or other improper conduct or unethical behaviour within the University.

The University is an accredited Living Wage (Scotland) Employer that has been certified by the <u>Living Wage Foundation</u> and implemented the Accredited Living Wage rate.

A due diligence approach is taken with service providers who regularly work onsite at the University to pay the Living Wage and the University evaluates suppliers' approach to Fair Work Practices, in line with statutory guidance.

# **Supply Chains**

The University of Aberdeen procures a wide range of goods, services and works. Our supply chains fall under the following main categories:

- Estates, Buildings and Facilities Management
- Laboratory Equipment
- Computer Supplies and Services
- Professional Services
- Utilities

The University is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Each regulated procurement process conducted by the University requires tenderers to disclose whether the bidder or any member of their organisation with decision making powers has been convicted in the last five years of any offence under <u>Part 1 of the Human Trafficking and Exploitation (Scotland) Act 2015</u>, or under any provision referred to in the Schedule to that Act. Tenderers that confirm such a conviction will be excluded from the process unless they can successfully demonstrate that they have taken sufficient measures to demonstrate compliance with this Act.

The University is a member of Advanced Procurement for Universities and Colleges Ltd (APUC), the procurement centre of expertise for Scotland's universities and colleges. We contributed to and adopted the <u>APUC Supply Chain Code of Conduct</u> as the University's Code of Conduct ensuring consistency in approach to the Supply Chain throughout the Sector. In asking relevant suppliers to adopt the Supply Chain Code of Conduct we collaborate with others to demonstrate a commitment not to use forced, involuntary or underage labour.

Suppliers are encouraged to provide details of measures they take in relation to modern slavery in their supply chain, including any third-party accreditations and assessments to evidence this.

The University of Aberdeen became a <u>founding member</u> of <u>Electronics Watch (EW) in 2014</u> and continues to support the organisation. EW co-ordinates industry-independent supply chain monitoring and works to achieve respect for labour rights in the global electronics industry through socially responsible public procurement of electronics hardware. EW aligned terms and conditions have been embedded within APUC-awarded IT framework agreements used by the University.

We continue to have a significant programme of transnational education projects which includes overseas delivery with partner institutions and various articulation agreements with partners. These are based in countries that may have different labour standards and practices and different legal recourse for victims of exploitation. In accordance with our international partnership approval and governance procedures, we unequivocally reject any initiatives conflicting with this Statement. At the inception of all such projects with direction and oversight from our University Partnerships Committee and International Advisory Group, and drawing upon the expertise of Industry specialists, we conduct comprehensive risk assessments and due diligence checks on the partner and host country, including a thorough examination of the human rights landscape. Furthermore, we require our overseas partners to assess and address their own modern slavery risks, sharing their findings and actions with us.

## **Summary of Last Financial Year**

In line with the University's Procurement Policy & Procedures, suppliers continue to be sent <u>the University of Aberdeen Supply Chain Code of Conduct</u> and companies must confirm they adhere to the Code of Conduct, in order to enforce and promote sound social, ethical, environmental and economic practises.

During 2025, the University Procurement Team worked with the Net Zero & Emissions Manager to identify high risk areas within our supply chain over past financial year. We then engaged with EcoVadis through APUC to conduct part of our supply chain due diligence and contact those suppliers we identified. EcoVadis has a well-developed methodology paired with a global team of expert analysts, which provides them with the ability to conduct individual sustainability performance assessments across all the relevant areas of our supplier/supply chain community.

In overseas building projects, where we have an interest, we insist on rigorous standards of human and worker rights and have mechanisms in place to support this. Existing governance structures have been enhanced further to oversee the University's interest in the potential construction by its Qatari partner of a proposed second phase of its Qatar operation. A Human Rights and Equalities Group is in place to advise the Strategic Partnerships Board and oversee the development of the Phase 2 proposal and potential subsequent build of the new premises so we can be assured of an appropriate standard of human rights, consistent with this Statement.

With the advice of an external, independent specialist appointed to offer recommendations and training this Group has developed a Human Rights and Worker Welfare Standard which has been adopted by the Strategic Partnership Board for the Qatar endeavour for implementation across the Partnership's activities.

In 2025, the University consolidated its global Top 100 position in both the Times Higher Education Impact Rankings (which captures universities' impact on society and the environment based on delivering the UN's Sustainable Development Goals) and the QS Sustainability Rankings (which assesses universities using an ESG framework i.e. environmental, social and governance), ranking =84th and =83rd in the world respectively (and 14th and 25th respectively in the UK).

### **Next Steps**

The University Procurement continues to progress work with EcoVadis, to identify and prioritise the high-risk categories and suppliers within the organisation's operations and supply chains. And will continue to use the University of Aberdeen Supply Chain Code of Conduct to help suppliers to understand the importance of compliance with ethical standards.

The Procurement Team continues to commit to undertaking all relevant training and awareness sessions, including the UKUPC Modern Slavery Series provided by APUC and the Scottish Government training available <u>via their website</u>.

In the course of the next year, should resource allow, we will continue to maintain real focus on this area and continually seek to identify any improvements or initiatives that would enhance our compliance. This will include continuing to raise awareness of what modern slavery means in the University context and will focus on how we train and upskill staff and students and how research in this area can enhance our understanding and therefore our practices.

**Chief Financial Officer** 

Mark who

17 December 2025

| Approving Authority           | University Court              |
|-------------------------------|-------------------------------|
| Consulted                     | Senior Management Team        |
| Approval date                 | 3 <sup>rd</sup> December 2025 |
| Approver (on behalf of Court) | Mark White                    |
| Title                         | Chief Financial Officer       |