# 1 Introduction

1.1 This document sets out Foundation Scotland's [FS] policy on Anti-Modern Slavery and the procedures it has put in in place to contribute to its prevention. Although it is not obliged under law to publish an Annual Anti-Modern Slavery Statement, in its role as a Community Foundation, FS wishes to support all efforts to reduce the violation of human rights.

# 2 Scope

2.1 This Policy applies to all employees.

# 3 Abbreviations and Definitions

## Abbreviations

- CEO – Chief Executive Officer
- LT – Senior Management Team

# 4 Policy

4.1 FS is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

4.2 As an equal opportunities employer, it is committed to creating and ensuring a non-discriminatory and respectful working environment for its employees. FS wishes all its employees to feel confident that they can expose wrongdoing without any risk to themselves.

4.3 FS's recruitment and management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and once employed to safeguard employees from any abuse or coercion.

4.4 The investments under FS's control are invested in Impact Funds whose underlying holdings are checked against a range of criteria including employment practices and supply chains.

4.5 FS does not knowingly enter into relationships with any organisation which supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## Our supply chain

4.6 Due to the nature of FS's activities, it has self-assessed to have a low risk of modern slavery in its activities and supply chains.

4.7 The FS supply chains are limited, and it procures goods and services from a restricted range of UK suppliers, often arranged through the Scottish Government Procurement Frameworks.

### Embedding the principles

4.8 FS will continue to embed the principles through:

- Ensuring that FS procurement activity and contract terms and conditions include references to modern slavery and human trafficking.
- Ensuring that employees involved in buying or procurement and the recruitment of employees receive training on the Modern Slavery Act 2015 and ethical procurement.

## 5 Roles and Responsibilities

- CFOO – is responsible for the provision of training.
- Employees – are responsible for undertaking the training and ensuring any agreements they are involved in contain modern slavery and human trafficking clauses.

## 6 Training

- LMS – Modern Slavery
- Access to the resources provided by FS's subscription to Ethical Consumer.

## 7 References

- Modern Slavery Act 2015

## 8 Review

8.1 This policy is reviewed, approved, and endorsed by the Board of trustees. It is updated when required by legislation, to ensure that it reflects statutory responsibilities, government guidance and best practice for FS, or every 36 months whichever is the soonest.

## 9 Document Properties

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