



## Business Ethics Policy

VIGILO Training Ltd believes that it is important for the organisation and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that VIGILO Training Ltd meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, VIGILO Training Ltd is committed to ensuring high ethical standards within the workplace and with its business relations in the supply chain.

The procedure that follows provides general guidance on ethics and refers to other policies of VIGILO Training Ltd where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the organisation, its employees, customers, suppliers and its stakeholders.

Annual audits will ensure that the organisation is meeting its aims with regard to social impact and ethical behaviour and that its stakeholders perceive the organisation in a positive light.

### Procedure

1. All employees will be provided with ethics training as part of the induction programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
2. All employees are required to adhere to the organisation's policy and procedure on business ethics. Employees who breach the organisation's policy on business ethics will be subject to disciplinary action up to and including dismissal.
3. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
4. The organisation has a code of conduct which employees are expected to abide by. A copy of the Code of Conduct and other policies relevant to this procedure are available on the organisation's Intranet/in the Staff Handbook.
5. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
  - a. Data protection/Access to employee data.
  - b. Whistleblowing.
  - c. The giving and receiving of gifts.
  - d. Confidentiality.
  - e. Relationships with competitors, suppliers, advertisers, etc.
  - f. Equal opportunities, discrimination and harassment.
  - g. Moonlighting.
  - h. The environment.
6. VIGILO Training Ltd endorses fully and adheres to the six principles of data protection, as set out in Article 5 of the General Data Protection Regulation (GDPR). These data protection principles are set out in the organisation's Data Protection/Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the organisation's Data Protection/Access to Employee Data policy should speak to their line manager in the first instance.

7. VIGILO Training Ltd encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. VIGILO Training Ltd recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the organisation's success ensured. Employees should refer to the organisation's Whistleblowing policy and procedure which provides guidance to employees who feel that they need to raise issues relating to the organisation with someone in confidence.
8. VIGILO Training Ltd does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
9. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any organisational confidential information, either during their employment or after their employment has ended. Confidential information includes information on the organisation's present or potential customers or suppliers and any information relating to the organisation's business, including marketing, corporate or financial plans.
10. VIGILO Training Ltd recognises that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While the organisation has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the organisation. Employees are expected to familiarise themselves with VIGILO Training Ltd's Personal Relationships at Work policy and procedure.
11. VIGILO Training Ltd is committed to equality of opportunity and diversity in the workplace. It is the company's policy to treat all job applicants and employees fairly and equitably, regardless of their sex, transgender status, pregnancy, maternity leave, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the organisation will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately. Further information is available in the organisation's Equal Opportunities policy and procedure.
12. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the organisation. Although VIGILO Training Ltd has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the company considers that this is incompatible with its interests or with the employee's health or safety and, in any event, unless employees have obtained prior written authorisation from senior management. Further information is provided in the VIGILO Training Ltd's Moonlighting policy and procedure.
13. VIGILO Training Ltd is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the company's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.