



ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Document Title: Anti-Slavery & Human Trafficking Policy

Company: VIGILO Solutions Ltd

Owner: Edward Gilmour

Review Period: Annual

Version: 2.0

Classification: Company Policy

1. Policy Statement

VIGILO Solutions Ltd is committed to conducting business ethically, with integrity and transparency in all business dealings. We recognise our responsibility to take a robust approach to slavery, servitude, forced labour, compulsory labour, and human trafficking in all forms.

VIGILO Solutions Ltd has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting professionally, fairly and with integrity in all business relationships. We are dedicated to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our organisation or supply chains.

We are committed to complying with the requirements of the Modern Slavery Act 2015 and expect the same high standards from all employees, contractors, agency workers, suppliers, subcontractors and business partners.

2. Scope

This policy applies to:

- All employees of VIGILO Solutions Ltd
- Directors and senior management
- Agency staff and temporary workers
- Contractors and subcontractors
- Suppliers and service providers
- Anyone working on behalf of the company

This policy applies across all areas of our operations and supply chain.

3. Our Commitment

VIGILO Solutions Ltd is committed to:

- Preventing modern slavery and human trafficking within our business activities and supply chain
- Ensuring fair recruitment and employment practices
- Maintaining safe, respectful and lawful working conditions
- Conducting appropriate due diligence on suppliers and subcontractors
- Encouraging openness and reporting of concerns without fear of retaliation
- Acting promptly where concerns or risks are identified

We will not knowingly support or engage with organisations involved in slavery, servitude, forced labour or human trafficking.

4. Recruitment & Employment Practices

VIGILO Solutions Ltd is committed to fair and lawful recruitment practices to reduce the risk of modern slavery and labour exploitation.

We achieve this by:

- Carrying out robust pre-employment screening and right to work checks
- Verifying identity documentation and legal entitlement to work in the UK

- Ensuring workers are employed voluntarily and are free to leave employment in accordance with contractual terms
- Prohibiting the withholding of personal documentation such as passports or identification
- Ensuring no employee is subjected to coercion, intimidation or exploitative working conditions
- Paying staff fairly and in accordance with applicable legislation and contractual agreements

5. Supply Chain & Procurement

VIGILO Solutions Ltd expects suppliers, contractors and business partners to operate ethically and in compliance with relevant legislation.

As part of our due diligence, where proportionate, we may:

- Assess suppliers for ethical business practices
- Seek assurance that suppliers comply with anti-slavery legislation
- Review supplier policies and procedures where appropriate
- Investigate concerns regarding unethical labour practices

VIGILO Solutions Ltd reserves the right to terminate relationships with suppliers or contractors found to be involved in modern slavery or human trafficking.

6. Recognising Signs of Modern Slavery

Indicators of potential modern slavery or exploitation may include:

- Individuals appearing fearful, withdrawn or under the control of others
- Lack of access to personal identification documents
- Signs of poor living or working conditions
- Workers appearing unable to speak freely or seemingly controlled by another person
- Unusual working arrangements or evidence of coercion

Employees should remain vigilant and report any concerns immediately.

7. Reporting Concerns

VIGILO Solutions Ltd encourages all employees, contractors and workers to report any concerns regarding suspected slavery or human trafficking.

Concerns should be reported to:

- A Line Manager
- Senior Management
- HR/Compliance Department

Reports will be treated seriously, sensitively and confidentially wherever possible. No employee will suffer detriment for raising a genuine concern in good faith.

Where appropriate, concerns may be escalated to relevant enforcement authorities.

8. Training & Awareness

VIGILO Solutions Ltd is committed to promoting awareness of modern slavery risks. Relevant employees may receive training or guidance to help:

- Identify indicators of modern slavery and exploitation
- Understand reporting responsibilities
- Recognise risks within operational environments and supply chains

9. Responsibility for the Policy

The Senior Management Team has overall responsibility for ensuring this policy complies with legal and ethical obligations.

Managers are responsible for ensuring employees understand and comply with this policy and for promoting a culture of ethical conduct throughout the organisation.

10. Breaches of this Policy

Any employee found to be in breach of this policy may be subject to disciplinary action.

Any contractor, supplier or business partner found to be involved in slavery or human trafficking may have their relationship with VIGILO Solutions Ltd terminated immediately.

11. Monitoring & Review

This policy will be reviewed annually, or sooner where legislative, operational or organisational changes require it, to ensure continued effectiveness and compliance.

Approved by: Edward Gilmour

Signed; 

Next Review Date: 18.05.2027