



POLICY

## Modern slavery policy (CP.004)

**VGC Value** – “We look after each other” - People are central to our success

### Vision

VGC Group operates an ethical and open approach to the way we do business. We will ensure transparency in our business and supply chain to uphold our belief of the fundamental human rights for a person not to be deprived of their liberty for another person's or organisation's gain.

We will manage this vision by ensuring we have effective monitoring systems in place, and encourage everyone to raise concerns, in confidence, about suspicions they may have regarding modern slavery.

### Strategy

We do not tolerate any form of unethical behaviour including unfair anti-competitive business practices.

VGC recognises that we have a responsibility to take a robust approach to modern slavery and human trafficking in line with the Modern Slavery Act 2015.

Modern slavery is a criminal activity and a violation of human rights. The deprivation of a person's liberty by another, to exploit them for personal or commercial gain is unacceptable. For these reasons, slavery and human trafficking is a matter of 'zero tolerance' at VGC.

VGC is committed to maintaining and enforcing effective systems and controls to prevent modern slavery and human trafficking in our business activities and supply chain.

VGC commits to taking all necessary steps to ensure our workforce is free from effects associated with modern slavery, human trafficking, forced or bonded or imprisoned labour. VGC will conduct right to work checks on every employee within its employment at induction and will ensure our recruiters are trained in how to spot the signs of modern slavery. We expect all our supply chain to perform the same checks in accordance with the Immigration, Asylum and Nationality Act 2006.

We undertake regular audits to highlight areas of risk from modern slavery in line with guidance from the GLAA. All suppliers are required to complete the supplier approval process and ensure compliance with relevant legislation. This policy applies to all members, employees, agents, consultants, and those parties in our supply chain... Any reported breach of this policy will be investigated and may lead to legal proceeding or disciplinary action, which subsequently could result in dismissal or termination of contract.

### Responsibility for reporting incidents of slavery.

The detection and reporting of slavery is everyone's responsibility and concerns should be raised at the earliest opportunity. Unless a person is in immediate physical danger, concerns should be raised in the following way:

- Raise the matter with Ciara Pryce, Laura Perry or your VGC line manager. Your VGC line manager will escalate immediately to Ciara Pryce and Laura Perry.
- or email [hr@vgcgroup.co.uk](mailto:hr@vgcgroup.co.uk)
- or use our confidential online reporting form at [vgcgroup.co.uk/staff-resources/whistleblowing](https://vgcgroup.co.uk/staff-resources/whistleblowing).
- or report it directly to the authorities; Modern Slavery Helpline 08000 121 700.

**All reports will be investigated confidentially and in line with guidance from the GLAA.**

If anyone requires any information about modern slavery or labour standard breaches, call the Modern Slavery Helpline 08000 121 700. In emergency, call the police on 999.

Signed

Dated: 31 January 2024

L. R. Mckidd

Laurence Mckidd  
Chief executive officer

*This policy confirms the commitments of all members of the VGC Group including VGC Labour Solutions, VGC Projects and VGC Personnel*

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### Related Information



KNOWLEDGE

**Whistle blowing policy**  
(CP.011)

31 March 2023

### Owner



**Laurence Mckidd**  
Chief Executive Officer