

Purpose of Policy

This policy confirms our commitment to uphold the human rights of workers, and to treat them with dignity and respect. This applies to all full time, part time, casual and contracted workers.

We are further committed to paying employees and providing conditions of employment in accordance with an applicable and lawful industrial instrument approved by the Fair Work Commission and to the standards set in the *Fair Work Act 2009*.

Vigilant Security & Investigations confirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

Related Policy Guidelines or Documents

- Vigilant Security & Investigations' contracts including provisions requiring disclosure of modern slavery risks
- Questionnaire for Suppliers (appendix 2)

Audit / Evaluation

Document review and audits are to be carried out annually to comply with legislative requirements.

Definition and Examples of Modern Slavery

Modern Slavery is defined in the ***Modern Slavery Act (Cth) 2018*** as conduct which would constitute:

1. an offence under Division 270 or 271 of the Criminal Code; or
2. an offence under either of those Divisions if the conduct took place in Australia; or
3. trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
4. the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

More broadly, Modern Slavery may be defined as conduct which would constitute:

- any conduct constituting a modern slavery offence,
- any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of Vigilant Security & Investigations.

Scope of Policy

This policy applies to all Vigilant Security & Investigations employees and any subcontractors within the Vigilant Security & Investigations supply chain.

Policy

As part of our hiring process workers must be engaged locally where available, be entitled by law to work in Australia and hold any and all current relevant licence, certificate, visa or authorisation to conduct the work for which they have been engaged.

All work must be voluntary and workers shall be free to leave work at any time or terminate their employment in accordance with the relevant employment legislation, regulations or workplace laws governing the employee's engagement.

Vigilant Security & Investigations and/or any of their suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Child or student labour is not to be engaged by the company or its suppliers.

In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment.

Reporting Concerns

As required by law Vigilant Security & Investigations will report to the Minister the actions it has taken to prevent Modern Slavery within its structure, supply chains and organisation, in accordance with the legislation.

Reporting unethical or unlawful conduct

A key part of supporting ethical standards is enabling Vigilant Security & Investigations and its subcontractors to feel free and safe to speak up when there are reasonable grounds to suspect that any person associated with Vigilant Security & Investigations are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to Tim Lindley, Director, or our whistleblower hotline run by an external and independent third party.

Actions Vigilant Security & Investigations will take to eradicate Modern Slavery within its Supply Chains

Vigilant Security & Investigations is committed to making sure that it does not engage suppliers that breach Modern Slavery legislation by regularly reviewing supply agreements.

Vigilant Security & Investigations is committed to holding its suppliers accountable to their commitment of eradicating Modern Slavery and will not knowingly engage suppliers that do not align with its position on enforcing basic human rights.

All Vigilant Security & Investigations supply contracts will include a clause pertaining to Modern Slavery requiring the Supplier to:

1. Provide commitments to eradicating Modern Slavery within its own supply chains;
2. Warranting that it has not been convicted of a Modern Slavery offence; and
3. Have completed its own due diligence on its supply chain.

Vigilant Security & Investigations will conduct risk assessments to determine which areas of its supply chain are most at risk of Modern Slavery offences and implement risk minimisation strategies.

Vigilant Security & Investigations will review supplier contracts in conjunction with the Acts and ensure terms in supplier contracts are consistent with and address the Acts' requirements.

Vigilant Security & Investigations will perform due diligence on the supply chains of its suppliers.

Training

Vigilant Security & Investigations will provide training to inform employees of this policy and what constitutes Modern Slavery.

Protections

Vigilant Security & Investigations will protect those individuals that report or identify Modern Slavery occurring within the organisation and supply chains.

Definitions are listed in Appendix 1
Supplier Questionnaire Appendix 2

Appendix 1: Definitions

Definitions	
Term	Definition
Child labour	<p>Child labour is described by the International Labour Organisation, work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:</p> <ul style="list-style-type: none"> • is mentally, physically, socially or morally dangerous and harmful to children; and/or • interferes with their schooling by: <ul style="list-style-type: none"> ○ depriving them of the opportunity to attend school; ○ obliging them to leave school prematurely; or ○ requiring them to attempt to combine school attendance with excessively long and heavy work. <p>A child is defined as a person below the age of 18.</p> <p>Child labour has three categories:</p> <p>(1) The unconditional worst forms of child labour, which are internationally defined as slavery, trafficking, debt bondage and other forms of forced labour, forced recruitment of children for use in armed conflict, prostitution or pornography, and illicit activities.</p> <p>(2) Labour performed by a child who is under the minimum age specified for that kind of work (as defined by national legislation, in accordance with accepted international standards), and that is likely to impede the child's education and full development.</p> <p>(3) Labour that jeopardises the physical, mental or moral well-being of a child, either because of its nature or because of the conditions in which it is carried out, known as "hazardous work".</p>
Debt bondage	Debt bondage describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive recruiting for labour services	Deceptive recruiting for labour services describes the situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
Due diligence	Due diligence describes the process organisations take to identify, prevent, mitigate and account for how they address their impacts on slavery and human trafficking.
Forced labour	Forced labour describes situations where the victim is either not free to stop working or not free to leave their place of work.
Forced marriage	Forced marriage describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Modern slavery	The <i>Modern Slavery Act (Cth) 2018</i> (the Act) defines modern slavery a term used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used

	to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour services; and the worst forms of child labour.
Migrant worker	Migrant workers are people who leave home to find work outside of their hometown or home country. Migrant workers include both foreign and domestic (internal) migrant workers.
Organisation/business	Organisation is a person or group that has its own functions with responsibilities, authorities and relationships to achieve its objectives. The concept of organisation includes, but is not limited to, sole-trader, company, corporation, firm, enterprise, authority, partnership, association, charity or institution, or part or combination thereof, whether incorporated or not, public or private.
Policy	A policy refers to documented guidelines or rules of conduct within an organisation. Human rights-related policies generally fall into two categories: stand-alone statements and policies that are integrated within an organisation's wider standards literature (eg. Worker codes of conduct and ethical sourcing standards).
Servitude	Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Supplier	A supplier is defined as an organisation or person that provides a product or service used in your supply chain. The supplier can have a direct or indirect relationship with your organisation. Examples of suppliers are: brokers, consultants, contractors, distributors, franchisees or licensees, home workers, independent contractors, manufacturers, primary producers, sub-contractors, and wholesalers.
Supply chain	A supply chains is defined as a sequence of activities or parties that provides products or services to the organisation.
Trafficking in persons	Trafficking in persons describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Training	Training can be focused on helping agents better understand organisation policies, how to effectively implement them and ways to avoid modern slavery risks associated with inaction.
Worker	A person who performs work, including seasonal, contract and other temporary labour. Both employees and independent contractors are considered workers.

Appendix 2: Suppliers

Contact details – [Company Contact Name]	
Organisation name	
Contact person	
Contact email	
Contact phone	

QUESTIONNAIRE TO BE COMPLETED BY SUPPLIER

Please complete the below questions in as much detail as possible. Please return the completed Questionnaire to the nominated [Company Name] contact (see above).

Contact details - Supplier	
Organisation name	
Organisation address	
ABN/ACN	
Parent company	
Contact person	
Contact email	
Contact phone	
Date of Questionnaire completion	
Additional documentation	
Is your organisation required to report under the <i>Modern Slavery Act (Cth) 2018</i> ? If so, please attach a copy of your modern slavery statement(s).	
Is there any other additional documentation you have attached to this questionnaire? If so, please list them here.	

Organisation structure

1.	<p>How aware are you of the activities of businesses in your supply chain?</p> <p><input type="checkbox"/> High: You are aware of all essential products and services provided by businesses in your supply chain conduct regular audits to ensure compliance with your policy.</p> <p><input type="checkbox"/> Moderate: You are aware of the principal suppliers and essential products and services of your supply chain.</p> <p><input type="checkbox"/> Developing: You have identified major suppliers, however You have very limited knowledge of supply chains below that level.</p>
2.	<p>Does your organisation have a policy or policies in place to deal with modern slavery?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If the answer is yes, please provide details or a copy of the policy and any documents that identify a process for ensuring compliance within the supply chain.</p>
3.	<p>Does your organisation have a person or team responsible for identifying and managing modern slavery risks within the organisation and the supply chain?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the role and responsibility of that person/team below.</p>

Training

4.	<p>Do you conduct staff training on how to identify, assess and respond to modern slavery risks?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the nature and frequency of the training.</p>
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Supplier engagement

5.	<p>Are Modern Slavery risk assessments carried out on new suppliers?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe the risk assessment process.</p>
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6.	<p>Are there low-skilled migrant workers working in your organisation's supply chains?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide information about where in your organisation's supply chain low-skilled migrant workers are employed.</p>
Response processes	
7.	<p>What action will you take if there are reports of modern slavery or substandard working conditions within your company or in its supply chains?</p>
8.	<p>Does your business conduct audits to identify and prevent risks of modern slavery in your business or supply chains?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please describe these activities below.</p>