

## Modern Slavery Policy v4

CG-P-69

This policy applies to all companies under Churchill Contract Services Group Holdings Ltd to include the following subsidiaries and trading names:

- Churchill Contract Services (CCS)
- Churchill Contract Services Rail (CCSR)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Churchill Contract Catering t/a Radish (RAD)
- Churchill Complete Compliance (CCC)
- Churchill Emergency Support Ambulance Services (CESAS)
- Churchill Make Ready Ambulance Services (CMRAS)

### Policy Statement

This statement is made on behalf of the CHURCHILL GROUP pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act') and constitutes our group's slavery and human trafficking statement for the financial year ending 30 June 2018.

The Churchill Contract Services Group Holdings is the parent company of the above subsidiaries and trading names and across the group we have over 11000 employees in the United Kingdom.

As an organisation whose purpose is to provide complete and bespoke Facility Management utilising joined up solutions with innovative processes, exceptional customer service and consistent delivery through our people, we wholeheartedly welcome the introduction of the Modern Slavery Act 2015.

Our position on human rights within Churchill is clear and covered in our Ethical Purchasing Policy and in our Corporate Governance and Ethics Policy. This legislation is a crucially important development in tackling slavery and human trafficking, and we will not trade or partner with any business or organisation which is involved in this shocking practice, however remotely or indirectly. We respect the human rights of all our employees and those within our supply chain and have zero tolerance of slavery and human trafficking.

All our businesses are dependent on their people and supply chains to support the delivery of our services. Each business is responsible to ensure that they can demonstrate they are compliant with the Modern Slavery Act by working to our Group policies and procedures.

### **Our governance in relation to slavery and human trafficking**

We have a long-established set of policies and procedures covering human rights in general and specifically addressing relevant areas to minimise the risk of slavery or human trafficking taking part in our businesses or supply chains.

Our relevant policies and procedures include:

- Ethical Purchasing policy (CG-P-47)
- Social and Ethical Procedure (CG-P-37)
- Humans Rights Policy (CG-P-65)
- Supply Partner Engagement policy (CG-P-61)
- Whistle Blowing Policy (CG-P-45)
- Safeguarding Policy (CG-P-34)
- Corporate Governance and Ethics Policy (CG-P-05)
- Recruitment, selection and On-boarding Policy (CG-P-32)

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### Our supply chains

Our supply chains include Facility sub-contractors, consumables suppliers, publishing and printing services, IT services, recruitment agencies, training providers and consultants, marketing, PR and legal services. We have reviewed the risks that these supply chains can present.

We expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation. To this end we have inserted a clause into our contracts requiring that they comply with the provisions of the Act and granting us the right to terminate in the event of their failure to do so. All our suppliers are subject to our on-boarding process in accordance with our Supply Partner Engagement policy (CG-P-61) and our Safe Contractor audit.

As part of our procurement process, we will only engage with suppliers and contractors who confirm their compliance with the Act. We will continue to keep our staff informed and raise awareness of how to recognise and respond to indicators of human rights abuses. We have adapted our existing corporate policies to incorporate modern slavery and human trafficking issues, including our whistleblowing policy which allows employees to report any concerns confidentially.

We actively promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain by ensuring all our suppliers comply with our Supply Partner Engagement policy and all legal requirements. The selection and partnering of our supply chain are managed through "Safe Contractor" approval audit as part of our due diligence to assess the suitability of a vendor to provide goods and services to Churchill. We expect our suppliers and other business partners to have the same high standards, and to continue this ethos throughout their supply chain.

Our HSEQ team carry out selection and ongoing supplier audits as part of our supply chain management to provide assurance that our suppliers are responsible partners in our service delivery.

### Supply chain risk assessment and management

Churchill assesses its supply chain for potential areas of increased risk with non-compliance to the Modern Slavery Act. Where areas of risk are identified audits are completed. The defined criteria for assessing potential areas of risk within our supply chain are:

- Churchill's strategic partners
- Manufacturing or trading in raw materials produced in non-UK/EU areas
- Companies that operate using temporary low skilled labour
- Operating outside of the UK / EU regulatory frameworks

### Whistleblowing

We encourage our people, customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes any concerns regarding the risk of slavery or human trafficking.

The Churchill Group's Whistleblowing policy is designed to assure employees who have a genuine concern about a malpractice or wrongdoing at work. Providing that employees make their disclosure in good faith either directly to their employer or in accordance with internal procedures, they need not fear victimisation or dismissal.

### Training on slavery and human trafficking

We have created awareness guidance for our suppliers, and training for our own people and consider that improved awareness is one of our most effective methods to reduce the risk of modern slavery. With the help of both our employees and suppliers we can ensure that there are no opportunities to hide forced labour within our organisation and that of our supply chain. We ensure we engage and share information briefings and Tool Box Talks (TBT's) with both partners and

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employees. Detailed training workshops for line managers cover Modern Slavery in areas such as procurement, recruitment (including agency workers), people management and development.

Our Corporate Governance and Ethics Policy (CG-P-05) forms the cornerstone of our wider ethical framework and provide our people with the guidance and support necessary. We have designed our code to help our people understand Churchill's core values and the responsible behaviours which underpin them.

We require not only that our people, our supply chain partners, joint venture partners and contractors' employees comply with our code too – with a specific Supply Partner Engagement policy (CG-P-61) code of conduct provided.

We demand the highest levels of ethical and moral stewardship in Churchill and are committed to being a responsible business and to develop mutually beneficial and sustainable relationships with our stakeholders, based on trust and co-operation.

### **Our people**

Churchill support the principles of the UN Global Compact, the UN Declaration of Human Rights and the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work.

We ensure that employment is chosen freely; freedom of association is respected; working conditions are safe and hygienic; child labour is not used; wages are not lower than minimum wage; working hours are not excessive; no discrimination is practised; regular employment is provided; and no harsh or inhumane treatment is allowed.

We carry out appropriate checks to ensure that any new applicant is suitable for the role that they have applied for. Prior to making an offer, we ensure that all applicants are aware of what checks we will carry out. We only make Job offers subject to satisfactory vetting procedures.

All our people undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and where applicable DBS checks. We employ most of our people directly or on a fixed term basis, with checks in place to ensure that payment of salary is direct to that person.

In addition to complying with legislative requirements, we carry out additional background checks on a risk basis, either through our own assessment or one carried out in conjunction with our client.

Our recruitment procedure outlines the mandatory requirements, which includes the requirement to use approved agencies. Our on-boarding procedure ensures that agencies can demonstrate that they comply with all legal requirements, including the requirement to comply with the Modern Slavery Act 2015.

### **Employee awareness and compliance**

Our Employee handbook and Corporate Governance and Ethics Policy (CG-P-05) set out all of our policies and key procedures. We provide all our people with their own copy of the handbook when they begin working for Churchill.

This, together with our targeted awareness on Modern Slavery and human trafficking helps us to ensure key messaging is communicated and our people can meet the requirements of the act.

All these documents are available internally and on our website.



**MONITORING & REVIEW OF POLICY**

In order to monitor compliance with and the effectiveness of the Company’s Modern Slavery policy a member of the Human Resources Department may be invited to or elect to be present or review at any stage of the process.

Regular reports on trends and statistics relating to the policy performance will be provided to the Board of Directors.

**Relevant legislation**

Section 54(1) of the Modern Slavery Act 2015

This policy will be formally reviewed annually and updated as required.

Signed on behalf of Churchill Contract Services Group Holdings Ltd

J.M. Briggs, Group Managing Director

Date: October 2018

Version history				
Version No.	Date	Section	Page	Summary of changes
1	Jan 17	All	All	New Branded Document
2	Oct 17	All	All	Replacement of CBC & PCBC with new trading company Radish (RAD)
3	July 18	-	-	Update on company names (name change only)
4	Oct 18	-	-	New financial year end