

# Churchill Group Modern Slavery Statement 2023

As a dedicated, conscientious and forward-thinking business within the FM industry, it is our priority to trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our business and supply chain. We promise to take any allegation of human rights abuse in all its forms seriously in our business and supply chain. We promise to protect the identity and confidentiality of anyone raising concerns.

Modern slavery is a complex issue and can take many different forms, it is part of the wider human rights agenda within our business. Churchill continues to take steps to identify any risks and eliminate any possible areas for abuse.

This statement is made under the Modern Slavery Act of 2015 Section 54 and constitutes our group modern slavery statement for the 2022/2023 financial year.

## Our commitment

Churchill is committed to preventing modern slavery and human trafficking throughout our business and supply chain. We do this by:

- Ensuring our policies and approaches are reviewed regularly
- Having appropriate training processes in place so that everyone has awareness and understanding of the risk and issues along with our responsibilities
- By having full transparency of our supply chain. Ensuring that all new suppliers understand our requirements before they commence working with us and that all our existing suppliers comply with our requirements

## Our business

Churchill Group is a UK-wide facilities management business. We manage and deliver soft facilities through our group of expert businesses, consisting of cleaning, security, catering, window cleaning and environmental compliance.

Our core purpose is to improve the environments we deliver in. Our core philosophy is Doing the Right Thing.

## Our supply chain

Churchill uses a range of suppliers and outsourcing partners to support the company with its operations. These include the supply of equipment, consumables, consultancy & management services, training & agency providers and subcontractors. As part of our onboarding process for new suppliers, our Modern Slavery policy is provided, and each company is required to agree to operate within the confines of the policy and adhere to our code of conduct before being permitted to work with our business.

We are committed to continuously improving our practices to identify and eliminate any slavery and human trafficking within our business and within our supply chains. We are also committed to operating ethically and with integrity in all of our business relationships.

## Our policies

Our practices and business policies are designed to ensure that our people are treated with dignity and respect by upholding all Human Rights principles.

Our policies relating to modern slavery are published on our corporate website <http://www.churchillservices.com>:

- Modern Slavery Policy
- Human Rights Policy
- Whistleblowing Policy
- Group Health and Safety Policy
- Anti-Bribery Policy

Our Human Rights and Modern Slavery Policy reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to identify, prevent and mitigate human rights' risks, slavery and human trafficking.

## Collaboration

Churchill cannot tackle modern slavery alone, so it is important that we work with our clients and suppliers to raise awareness and identify any potential risks.

## Our Governance and approach to due diligence

Churchill has clear policies and monitoring in place combined with a thorough approach to supply chain management. We update these policies and practices regularly as we learn from our experience.

We have implemented extensive training and awareness programmes to ensure that both our people and our suppliers clearly understand the issues, our required standards and their obligations and responsibilities. We perform regular audits and checks of our systems and data, including:

- Excessive hour checks
- Proof of addresses checks
- Bank account checks

## Key actions to date

Over the last year we have:

- Continued to rollout online training to all our management and administration populations with over 75% of this population have completed the online training
- Continued to rollout toolbox talks on modern slavery to our operational supervisors.
- Placed posters raising awareness on notice boards at operational sites, regional offices and our head office
- Improved confidential reporting of whistleblowing so that all of our people feel supported in raising any concerns that they have without any personal risk or fear
- Provided awareness to our suppliers through improved onboarding requirements
- Completed a communication awareness programme with our suppliers

## Future plans

Over the coming year we plan to focus on the following areas:

- Review of supply chain process and complete compliance audits
- Provide continual training to all of our employees

This Statement has been approved by the Board of Churchill Group



J. Bradley  
Group Chief Executive Officer

February 2023

