

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)
- Amulet (Churchill Security Solutions) (AMU)
- Churchill Environmental Services (CES)
- Chequers Contract Services Ltd (CHE)
- JV Price Ltd (JVP)
- Gateway Environmental Ltd t/a Vantage (VAN)

## **Policy Statement**

The Churchill Contract Services Group Holdings is the parent company of the above subsidiaries and trading names and across the group, we have over 15,000 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 commit to the principles 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 Business Ethics Policy. We have implemented this policy to reflect our commitment to abolishing modern slavery and human trafficking, and we will not trade or partner with any business or organisation which knowingly supports, or is found to be, involved in slavery, servitude and forced or compulsory labour. We respect the human rights of all our employees and those within our supply chain and have a zero-tolerance policy towards modern 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 for ensuring 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 comprehensive set of policies and procedures covering human rights with specific consideration given to the risks and prevention of slavery and human trafficking in our businesses and supply chains.

Our relevant policies and procedures include:

- Social and Ethical Procedure (CG-P-37)
- Humans Rights Policy (CG-P-65)
- Whistle Blowing Policy (CG-P-45)
- Safeguarding Policy (CG-P-34)
- Corporate Governance and Business Ethics Policy (CG-P-05)
- Recruitment, Selection, On-boarding, Employment and Leavers Policy (CG-P-32)
- Vendor Management Policy - Subcontractors (CG-P-31)
- Vendor Management Policy - Suppliers (CG-P-77)
- Modern Slavery Policy (CG-P-69)
- Modern Slavery Statement (CG-P-69a)
- Modern Slavery Vendor Code of Conduct (CG-F-404)
- Ethical Purchasing Policy (CG-P-47)
- Sustainable Procurement Policy (CG-P-29)

## **Our supply chains**

Our supply chains include facility sub-contractors, consumables and product suppliers, workwear and PPE, publishing and printing services, IT services, recruitment agencies, training providers and consultants, marketing, PR and legal services. We have an ongoing review programme managed by the Procurement department, to assess the risks that these supply chains can present.

We expect our suppliers and contractors to demonstrate a zero-tolerance approach to exploitation. We have a clause in our contracts requiring that they comply with the provisions of the Act and granting us the right to terminate the contract if they fail to do so. Our suppliers are subject to an onboarding approval process in accordance with our Vendor Management Policies (CG-P-31 and CG-P-77).

As part of our onboarding process for new vendors, our Modern Slavery Statement, Modern Slavery Policy, Human Rights Policy, Modern Slavery Code of Conduct and Ethical Purchasing Policy documents are provided, ensuring all new vendors understand our requirements and confirming their compliance to our requirements before they commence working with us. Our vendors partners are also required to comply with our requirements. We will not enter into a trading relationship with any vendor that does not confirm compliance with our policies.

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 audits 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 maintain this ethos throughout their supply chain.

Our QHSE team carry out selection audits and where there is deemed to be an area of risk, they complete ongoing supplier audits as part of our supply chain management.

## **Supply chain risk assessment and management**

Churchill assesses its supply chain for potential areas of increased risk of non-compliance with the Modern Slavery Act. Where areas of high risk are identified, physical audits at the vendor premises are conducted and if necessary, additional physical audits are carried out at their supply chain premises. 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 suspicions of unlawful conduct, including any concerns regarding the risk of slavery or human trafficking.

The Churchill Group's Whistleblowing policy is designed to assure employees that they can confidentially report a genuine concern about malpractice or wrongdoing at work, without any risk to themselves. Providing that employees make their disclosure in good faith; they need not fear victimisation or retaliation.

## **Training on slavery and human trafficking**

We provide awareness training to our employees which give them the knowledge to identify modern slavery and human trafficking indicators and the appropriate action to take if they suspect it. We have also created awareness guidance for our suppliers to reduce the risk of modern slavery. We engage and share information briefings and Tool Box Talks (TBT's) with both partners and employees.

Our Corporate Governance and Business Ethics Policy (CG-P-05) forms the cornerstone of our wider ethical framework and provides 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 that not only our people, but our supply chain partners, joint venture partners and contractors' employees comply with our code too.

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

## **Our people**

Churchill supports the principles of the UN Global Compact, the Universal 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 tolerated
- Wages are not lower than minimum wage
- Working hours are not excessive
- There is a zero-tolerance policy on discrimination
- Regular employment is provided
- Everyone is treated with dignity and respect

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 the checks we will carry out. All job offers are subject to satisfactory vetting checks.

All employees must complete satisfactory 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, either permanently or on a fixed term basis, with checks in place to ensure they are paid directly into their own personal bank account.

In addition to complying with legislative requirements, we may carry out additional background checks on a risk basis, either by our own assessment or if it is deemed necessary by our client.

Our recruitment procedure outlines the mandatory requirements, which includes the requirement to use only 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 Business Ethics Policy (CG-P-05) set out our policies and key procedures. An electronic copy of the handbook is made available to all employees 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 therefore our people can meet the requirements of the act.

These documents are available internally on our company intranet.

## **Responding to reports of modern slavery**

The flow chart at Appendix 1 shows the process to be followed should a report of modern slavery be made. Any suspected instances of modern slavery are to be reported to the Human Resources department in the first instance who will seek appropriate advice from the Modern Slavery & Exploitation Helpline (08000 121 700).

Reporting a suspected instance of modern slavery to the police in the first instance may have a detrimental impact, therefore, we ask that you do not engage with the police unless you are advised to do so.

It is of paramount importance that the safety of any potential victim of modern slavery is fully considered.

## **MONITORING & REVIEW OF POLICY**

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**

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

A handwritten signature in black ink, appearing to be "J. Bradley", written over a horizontal line.

J. Bradley, Group Chief Executive Officer

Date: April 2025

Encl: Appendix 1 – Modern Slavery Process Map

**Modern Slavery Process**

