

# Churchill Group Modern Slavery Statement 2025 - 2026

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 in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group modern slavery statement for the financial year 1<sup>st</sup> July 2025 to 30th June 2026.

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

- Churchill Contract Services Limited
- Amulet (Churchill Security Solutions) Limited
- Churchill Environmental Services Limited
- Chequers Contract Services Limited
- JV Price Limited
- Gateway Environmental Services Ltd

## 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 annually or sooner, in line with legislative changes
- Having appropriate training processes in place so that everyone has awareness and understanding of the risk and issues, along with our responsibilities
- 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, 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 and Code of Conduct are 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. Failure to comply with any element of the policy or code of conduct requirements may result in vendors being removed from onboarding or our approved vendor list.

We currently have a number of vendor categories that we consider high risk. This could be vendors resident in known geographical modern slavery hotspots, vendors supplying low-paid agency workers or vendors offering services using low-paid, low-skilled labour. Our vendors within these categories are monitored more closely and are subject to more frequent reviews. We also ask them to complete a Modern Slavery Questionnaire and their responses are evaluated and categorised into low, medium or high risk. Vendors who are identified as high risk are subject to an additional Procurement Modern Slavery Audit at their premises to safeguard compliance.

Our Vendor Assurance team closely track our vendors documentation expiry dates and ensure they update their Modern Slavery certifications and other required documents. Vendors failing to provide such updates, or to demonstrate compliance, will be subject to the Expired Vendor process and given a grace period to rectify the issue. Failure to comply may result in removal from our Approved Vendor List and termination of any ongoing 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](#)
- [Modern Slavery Code of Conduct](#)
- [Group Health and Safety Policy](#)

Our Human Rights and Modern Slavery Policies 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.

## Our training

- SharePoint page dedicated to support and awareness on Modern Slavery within our company intranet
- Mandatory e-learning module for our management and administration populations, completed annually
- Mandatory Toolbox Talks, delivered annually to our front-line employees
- The content of both the e-learning module and the toolbox talks cover:
  - What modern slavery is
  - Who is affected by modern slavery
  - How to identify modern slavery
  - What to do if you suspect modern slavery is taking place

## 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.

In 2024 we began a partnership with Unseen, a UK charity who work with businesses to reduce risks and become leaders in preventing worker exploitation. As part of their service, they have conducted a review of our existing policies and practices to analyse where there are gaps.

## 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 address checks
- Multiple occupancy of address 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 80% of this population having completed the online training
- Continued to rollout toolbox talks on modern slavery to our operational supervisors and front-line employees
- 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
- Continue to work through the gap analysis report which was completed by Unseen, reviewing and implementing their recommendations
- Update line manager training to include where to find posters and other resources in order to signpost their teams to the relevant information

This Statement has been approved by the Board of Churchill Group



J. Bradley  
Group Chief Executive Officer

July 2025

