

Modern Slavery Code of Conduct v3

CG-F-404

Principles for Suppliers

As a responsible supplier of business process services to clients across the Public, Private and Third Sectors, Churchill adheres to a set of ethical values which we expect all of our suppliers and partner organizations to follow as well. We have therefore drawn up and adopted the following Code of Conduct which anyone doing business with us must follow.

1. Law and Ethical Standards

The Supplier shall comply with all laws, rules and regulations which affect its business. It should 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, and wherever its business is situated and conducted, it must follow national law and practice.

This especially applies to:

a. Child Labour

The Supplier must not employ any children under the age of 15. Even if national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the environment would be harmful to their development or their health;

b. Forced Labour

The Supplier will make no use of any forced, bonded or compulsory labour;

c. Freedom of Association and recognition of the right to Collective Bargaining

The Supplier will respect the right of employees to freely and voluntarily establish and join groups for the promotion and defence of occupational interests, and will engage in good faith with such groups, or designated representatives in consideration and agreement of employment matters;

d. Compensation and Working Hours

The Supplier will comply with the respective national laws and regulations regarding working hours, wages and benefits;

e. Discrimination

The Supplier will not discriminate on the basis of race, sexual orientation, religion, disability, age or gender.

Churchill is committed to conducting its business to high ethical standards and it expects the same of its Suppliers. Suppliers must train their employees to be sensitive to ethical considerations and to consider the effect of their actions and behaviour on their own business, its reputation and business and public relationships. Suppliers are expected to take particular account of the potential consequences of their employees' actions and behaviour on Churchill's and Churchill's clients' respective businesses, responsibilities and reputations. Unethical business practices will be reported and Suppliers must take appropriate action to correct and report them. Wherever criminal violations of laws are suspected, these should be reported to the appropriate authorities for possible prosecution, with any other violations being reported, investigated and dealt with suitably.

2. Health and Safety

Suppliers are expected to implement high standards of occupational health and safety, they must comply with applicable occupational health and safety regulations and must provide a work environment which is safe and conducive to good health in order to preserve the health of their employees and prevent accidents, injuries and work-related illnesses.

3. Business Continuity Planning

Suppliers should be prepared for any disruptions to their business (such as natural disasters, terrorism, software viruses, illness, pandemics and infectious diseases). This preparedness should include disaster plans to protect employees and the environment as far as possible from the effects of possible disasters which may arise from, or in connection with the services which a Supplier provides.

Modern Slavery Code of Conduct v3

CG-F-404

4. Improper Payments and Bribery

The Supplier must comply with international anti-bribery standards, as stated in the United Nations Global Compact and local anti-corruption and bribery laws, including the Bribery Act 2010. In particular, Suppliers must not offer any services, gifts, benefits or other inducements to Churchill employees which might have the effect of influencing the employee's conduct in representing Churchill.

5. Environment

The Supplier will comply with all applicable environmental laws, regulations and standards and will implement an effective system to identify and eliminate potential hazards to the environment.

6. Business Partner Dialogue

The Supplier will communicate the principles in this Supplier Code of Conduct to its subcontractors and other business partners who are involved in supplying any of the products and services. The Supplier will motivate them to adhere to the same standards and will take action to monitor performance.

7. Compliance with the Supplier Code of Conduct

Churchill encourages its Suppliers to adopt and implement their own guidelines for ethical behaviour, and reserves the right (upon giving reasonable notice) to check that its Suppliers are complying with this Supplier Code of Conduct. As part of their contractual obligations to Churchill, Suppliers are expected to encourage their own suppliers to keep to the same ethical standards, human rights, health and safety and environmental standards as those which are the basis for this Supplier Code of Conduct.

Churchill will consider any breach of the obligations stipulated in this Supplier Code of Conduct as a material breach of conduct by the Supplier.

I can confirm that above Churchill document has been read, understood and communicated to applicable staff. I also confirm that I am authorised to sign this document on behalf of the Company stated below;

Please do not use electronic signatures as these will not be accepted as confirmation of approval

Your company name:		Date:	
Print name:		Signed	
Job title:			

Version history				
Version No.	Date	Section	Page	Summary of changes
1	Jan 2017	ALL	ALL	New Branded Document
2	Apr 2017	ALL	ALL	Addition of box for supplier to sign
3	Apr 2019	ALL	ALL	Review and rebranding