



The Churchill Ethical Policy

Revision August 2021

Implementation of Code requirements

Suppliers are expected to establish management systems for delivering compliance to this Code, and maintain records demonstrating compliance.

Suppliers are expected to communicate the requirements of this Code to all employees, suppliers and any out-workers or subcontractors engaged in their supply chain.

Suppliers shall comply with all applicable national laws in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.

Suppliers shall comply with all Churchill policies related to Ethical Sourcing.

Suppliers are expected to maintain accurate financial books and business records in accordance with all relevant legal and regulatory requirements and accepted accounting practices.

Suppliers are expected to adopt similar principles in dealing with their own supply base. Suppliers are expected to complete their own risk assessments and audits of their own suppliers and undertake appropriate due-diligence.

Employment of children

Suppliers shall adhere to the minimum employment age limit defined by national law or regulation, and comply with relevant International Labour Organization (ILO) standards. In no instance shall a supplier permit children to perform work that exposes them to undue physical risk that can harm physical, mental, or emotional development or improperly interfere with their schooling needs.

Forced labour

In accordance with the modern slavery act (MSA) 2015

There shall be no forced, bonded or involuntary labour of any description.

Suppliers shall allow their employees the right to leave after giving reasonable notice.

Workers shall not be required to lodge deposits or ID papers unless it is a legal requirement to do so. In all circumstances, these must be returned promptly upon cessation of employment.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forces or Compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

Health, safety and hygiene

Every effort shall be made to provide a safe and hygienic working environment. Adequate steps should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work.

Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers' health and safety.

No worker shall be employed in potentially hazardous conditions without receiving adequate safety training and supervision. Records of safety training must be available for inspection. Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by their employer.

Suppliers shall provide essential items of climatically appropriate protective clothing and safety equipment free of charge to their workers.

Workers shall be provided with access to potable drinking water, clean toilets, and (if appropriate) washing facilities.

Where provided, accommodation shall be safe, clean and meet the basic needs of workers.

Where management provides dedicated transport for the movement of the workforce to, from or within the workplace, these shall conform to the minimum standards set down in the appropriate national transport legislation. In the absence of such legislation, the management shall make every reasonable effort to minimise risk to the workforce while transporting them.

Food, beverages and domestic goods offered for sale to workers shall be at price levels no higher than those prevailing nationally.

Discipline

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are not acceptable.

Disciplinary and grievance procedures shall be clearly documented and communicated to all employees. All disciplinary measures of a serious nature shall be recorded.

Freedom of association and employee representation

Suppliers shall respect employees' rights to form, join or refrain from joining any associations, trade unions or workers councils.

Workers should not be intimidated or harassed to join / or not join and Employers shall not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.

Working hours

Workers are not required to work more than the regular and overtime hours allowed by the law of the relevant country.

Overtime shall be voluntary, and not requested on a regular basis; it shall be paid at a premium rate or in accordance with national legislation.

There shall be proper provision for rest and sleep. Breaks, holiday allowance and rest periods shall be in full accordance with national law.

Equality of treatment

There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion or caste.

Workers must not be expected to perform duties incompatible with their physical or mental abilities.

Wages

Wages and benefits shall be at least fully comparable with locally benchmarked industry norms or national legal requirements.

Before entering into employment, workers should be informed as to the payment process. Wages shall be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account, at the agreed intervals and in full. Information relating to wages shall be available to workers in an understandable form.

No deductions from wages, other than those required by national law, shall be permitted without the express agreement of the worker concerned. Deduction from wages for disciplinary purposes shall not be permitted.

Regular employment

All workers shall be provided with simple, written contracts which must detail the terms and conditions of their employment. Contracts should be in the appropriate language for each worker.

Employers must not employ workers on repeated temporary contracts or apprenticeship schemes merely to avoid paying wages and other benefits given to permanent workers.

Employers shall encourage workers to participate in all state benefit schemes, especially sickness, injury and retirement pensions. They shall offer advice to do so, if needed.

The company must take effective steps, which are at least in compliance with the requirement or recommendations of government and/or local labour authorities, to avoid the employment of workers who do not have the legal right to work.

Bribery and Corruption

Suppliers should have adequate procedures in place to prevent bribery and corruption in all commercial dealings undertaken. This includes obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Environmental

Suppliers shall carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

Whistleblowing

Suppliers shall establish their own whistleblowing policies which encourages their workforce to raise genuine concerns about serious matters which are in the public interest. These include; the health and safety of employees and members of the public, damage to the environment, criminal offences, and any deliberate attempt to conceal any of the above.

Continual Improvement

The principles and standards detailed in the Churchill ethical policy set out what is expected from suppliers as a minimum requirement. Suppliers should strive to continuously improve on all aspects of the policy and take appropriate steps to evolve and improve practices related to the elements detailed in the ethical policy.