



CHURCHiLL

Supplier Code of Conduct

Revision April 2025 (previously the Churchill Ethical Policy)



Introduction / Our Expectations

In addition to our manufacturing facility in the UK, Churchill has a supply chain which reaches across the globe. Churchill is committed to ensuring that wherever a product is manufactured, our suppliers share our commitment to the welfare of workers and to use natural resources responsibly and efficiently.

We take our responsibility to ensure the human rights of our employees and those employees within our supply chain seriously. We expect the same consideration to employees from our partners as we show our own employees.

Elements of this code are based on the Ethical Trading Initiative (ETI) base code. The ETI base code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

We believe that all those involved in the supply of our products should work together to deliver robust practical solutions to improve working conditions, lessen our impact on the environment and to counter modern slavery and human trafficking. Transparency, collaboration and mutual respect are key principles in this.

The purpose of this document is to outline our ways of working, which we apply to our supply chain in relation to responsible sourcing. The Churchill Supplier Code of Conduct lays out the minimum standards that we expect our suppliers to meet. We seek to build lasting relationships with our suppliers, and these minimum standards are part of performance criteria used to determine which suppliers Churchill will continue to engage with and grow our business with.

Churchill will work with suppliers to support necessary improvements, but will take action if they are not prepared to work collaboratively to drive improvements.

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 must always comply with, or exceed, all applicable laws, rules and regulations in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.

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.



1) Forced Labour



**2) Freedom of association and
employee representation**



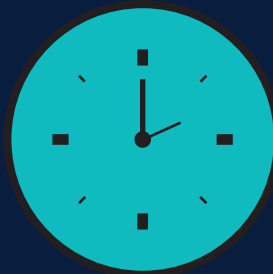
3) Health, safety and hygiene



4) Child Labour



5) Wages



6) Working hours



7) Equality of treatment



8) Regular employment



9) Harassment and Abuse



**10) Business Ethics – Bribery,
Corruption and Whistleblowing**



**11) Environmental and
Sustainability**



12) Continual Improvement

1.

Forced Labour

Employment must be freely chosen. 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 with their employer.

Modern Slavery is a criminal offence and a violation of fundamental human rights. It can take various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Churchill have a zero-tolerance approach to modern slavery. Churchill suppliers are expected to take steps to identify, understand and manage risks of modern slavery in their operations and in their supply chains. Suppliers are expected to notify Churchill immediately if they become aware of or suspect any modern slavery in their own operations or supply chains.

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
Forced 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



2.

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 such bodies described above. Employers shall not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.

Worker representatives should not be discriminated against and are able to carry out their representative functions in the workplace.



3.

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 regularly monitor risks posed to workers' health and safety.

Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. 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 in a safe manner.

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 and clean toilets. If appropriate, workers shall be provided with washing facilities and sanitary facilities for food storage.

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.

Supplier's buildings must be fit for purpose. All buildings and load bearing structures must be constructed according to local law, certified engineering construction approvals or international standards.

The supplier must have appropriate fire and emergency action plans in place to protect workers during normal working operations and emergency situations. This should include as a minimum; fire detection systems to notify workers of emergencies, safe exit routes and safe shelter locations.



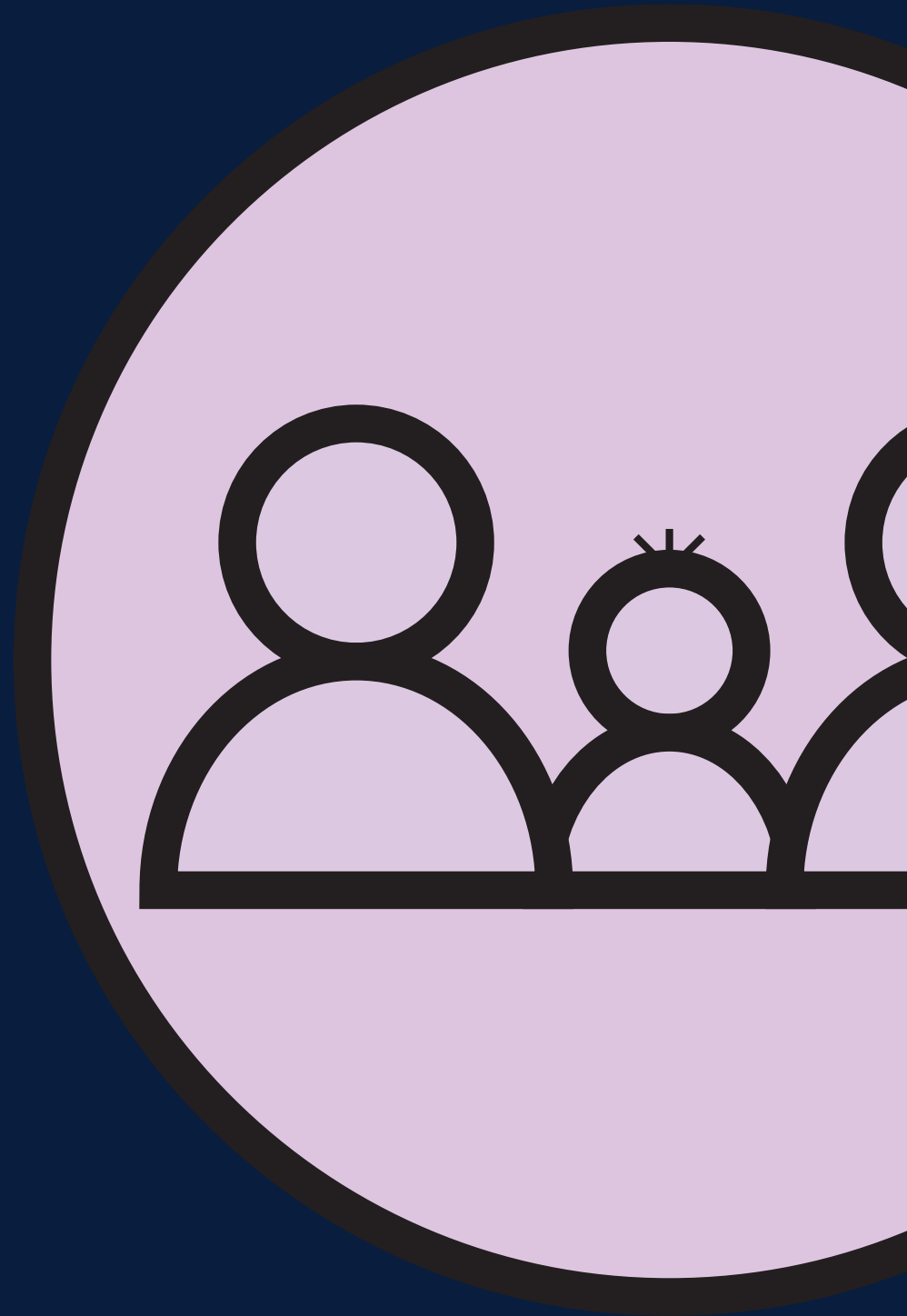
4.

Child Labour

Child labour shall not be used. Suppliers must adhere to the minimum employment age limit defined by national law or regulations and comply with relevant International Labour Organization (ILO) standards.

Persons under the age of 18 shall not be employed at night or in hazardous conditions.

Companies shall develop or participate in policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a 'child'.



5.

Wages

Wages and benefits paid for a standard working week, meet at a minimum, national legal standards. Wages should always be enough to meet basic needs and to provide some discretionary income.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

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.



6.

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.

Extended working hours must only be in exceptional circumstances where all of the following are met:

- This is allowed by national law;
- This is allowed by a collective agreement freely negotiated with a workers organisation representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

There shall be proper provision for rest and sleep. Breaks, holiday allowance and rest periods shall be in full accordance with national law. Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.



7.

Equality of treatment

No discrimination shall be practised. There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.



8.

Regular employment

Where required by national law and practice, 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.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of:

- Labour-only contracting
- Sub-contracting
- Home working arrangements
- Apprenticeship schemes where there is no real intent to impart skills or provide regular employment

Nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment



9.

Harassment and abuse

No harsh or inhumane treatment is allowed. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

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



10.

Business Ethics – Bribery, Corruption and Whistleblowing

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.

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.

Churchill has its own Anti-Bribery and Whistleblowing policies, both of which can be found at www.churchill1795.com

If you have any concerns about the behaviour of any Churchill employees with respect to acts of bribery or corruption in our business dealings, this should be reported immediately. Churchill has a confidential and anonymous reporting line at ethics@churchill1795.com



11.

Environmental and Sustainability

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

The supplier shall strive to minimise emissions, air pollution and climate impact. Investment in efficiency improvements and the use of renewable energy sources is strongly encouraged.

Suppliers shall measure and continuously strive to minimise waste generation. Waste should be segregated, managed and disposed of in compliance with relevant laws and regulations.

The supplier strives to understand and manage its use of water. Suppliers should promote reduction in the use of water in its operations.

The use and disposal of chemicals must be properly managed. Suppliers shall comply with all laws and regulations surrounding the use and disposal of chemicals, and demonstrate an effective approach to identifying and mitigating risk to workers and the environment.

Where relevant and applicable, suppliers shall take appropriate steps to ensure that their actions do not contribute to deforestation.

Suppliers shall take appropriate steps to minimise the environmental impact of packaging. Suppliers should continuously apply the principles of eco-design, removing unnecessary packaging, selected recycled materials where possible, and facilitate future packaging reuse or recycling.



12.

Continual Improvement

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

We are in compliance with the above and will be communicated with all employees, suppliers and sub-contractors:

Sign: _____

Date: _____

