

# Churchill China plc Modern Slavery Statement

This statement has been prepared for the year ended 31 December 2025 in accordance with the Modern Slavery Act 2015. The statement sets out the actions carried out by the group to prevent modern slavery in its operations and supply chain.

## Introduction

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. We believe that all those involved in the supply of our products, be they suppliers, customers and other key stakeholders, should work together to deliver robust practical solutions to counter modern slavery and human trafficking.

Going forward the Company will continue to review its policies and procedures in relation to this important subject and will carry out periodic reviews with partners to ensure compliance with Company guidelines.

## Scope

This policy applies to Churchill China's global business operations. Employees whose responsibilities relate to the sourcing of stock, and materials are informed and are expected to assist our compliance with these requirements, associated legislation, and regulations. This policy is reviewed annually and changes are incorporated accordingly.

## Our Commitment

We respect the environment, the community in which we operate, and our employees' human rights, and we oppose corruption. Therefore, we are committed to conducting our worldwide business operations in a manner that complies with applicable laws and regulations. We are also committed to taking steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of our business. Our outsourced finished goods suppliers are required to sign our Supplier Code of Conduct, which is based on the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is founded on International Labour Organisation (ILO) conventions and is an internationally recognised standard for labour practices. These suppliers are required to undergo regular, targeted independent audits under either SMETA or BSCI.

## Definitions

Churchill China supports the United Nations Global Compact's Ten Principles which are based on The Universal Declaration of Human Rights. The UNGC specific Ten Principles are:

- Support and respect the protection of internationally proclaimed human rights.
- Ensure the company is not complicit in human rights abuses.
- Uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Uphold the elimination of all forms of forced and compulsory labour.
- Uphold the effective abolition of child labour.
- Eliminate discrimination in employment and occupation.

- Support a precautionary approach to environmental challenges.
- Undertake initiatives to promote greater environmental responsibility.
- Encourage the development and diffusion of environmentally friendly technologies.
- Work against corruption in all its forms, including extortion and bribery.

Under the UNGC, Human rights are the same as labour rights; human trafficking and slavery assessments adopt UNGC assessment approach and definitions.

**Supply Chain:** Entities with which the enterprise has a direct or indirect business relationship and which either (a) supply products or services that contribute to the enterprise's own products or services or (b) receive products or services from the enterprise.

**Due Diligence:** Due diligence in the context of human rights comprises an ongoing management process designed to support the organization in meeting its responsibility to human rights. A human rights due diligence process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed.

**Human Rights Risk:** Any risks that a business's operations may lead to one or more adverse human rights impacts.

**Adverse Human Rights Impact:** An adverse impact occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. A human rights impact may be actual or potential. Adverse impacts may be caused by an enterprise through its own activities; may be contributed to by an enterprise either directly or indirectly through an outside entity or may be caused by someone with whom the entity does business and is linked to the entities own operations, products or services.

**Worker:** Workers include direct employees, temporary workers, migrant workers, student workers, contract workers, and any other person(s) providing labour and employment services to entities in the supply chain.

## Our Expectations

Churchill China has a complex and geographically dispersed supply chain and engagement with our suppliers in this environment requires focused efforts to comply with these rules. We expect our suppliers not to be involved in forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons of any age at any tier of the supply chain. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. Suppliers, as employers or agents, may not hold or destroy employees' identification or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law.

Employers may not restrict workers' freedom of movement in the facility or entering or exiting company-provided facilities. All work must be voluntary and workers shall be free to terminate their employment and leave work at any time. Employers and agents may not use misleading or fraudulent practices during the recruitment of employees. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment and the hazardous nature of the work, prior to

the worker departing from his or her country of origin. Workers must not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

We expect our suppliers to have a compliance plan in place to ensure that human trafficking and forced labour are not used and that risks of worker exploitation are mitigated. We will continue to promote and encourage our suppliers to take steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of their businesses. We expect our suppliers to conduct due diligence on their respective supply chains and to assist us with our compliance with these rules.

To the extent that a supplier refuses to cooperate with our compliance efforts, we may reconsider our supply arrangement and implement remedies available to us.

## **Reporting Concerns**

Churchill China maintains an email based Integrity Reporting system ([ethics@churchill1795.com](mailto:ethics@churchill1795.com)), providing any interested party a confidential reporting mechanism to communicate issues regarding Churchill China's supply chain.

David O'Connor

Chief Executive Officer

Approved by the Board on 28 April 2026.