

# End Modern Slavery Report

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# 2020



Marshalls

*Creating Better Spaces*



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# Covid-19



## COVID-19 IMPACT & RESPONSE

Shortly after the World Health Organisation characterised Covid-19 as a pandemic Marshalls introduced a range of measures to support national and global efforts to help tackle the spread of the virus and to ease its impact upon business critical suppliers. These measures included putting in place robust health and safety measures to keep employees safe, clearly and consistently communicating with our teams about the fast-changing impacts and implications, safely continuing to deliver urgent construction products and materials to NHS sites, including NHS Nightingale North West, donating as much PPE to the NHS as we were able, staying connected with our key suppliers to understand the impact of the crisis upon their operations, maintaining order levels and importantly continuing to pay suppliers – in some cases in advance to ease the immediate financial impact upon them.



Ensure the highest levels of health and safety for our team.



Safely maintaining product delivery to the NHS.



Donating as much PPE as we could to the NHS.



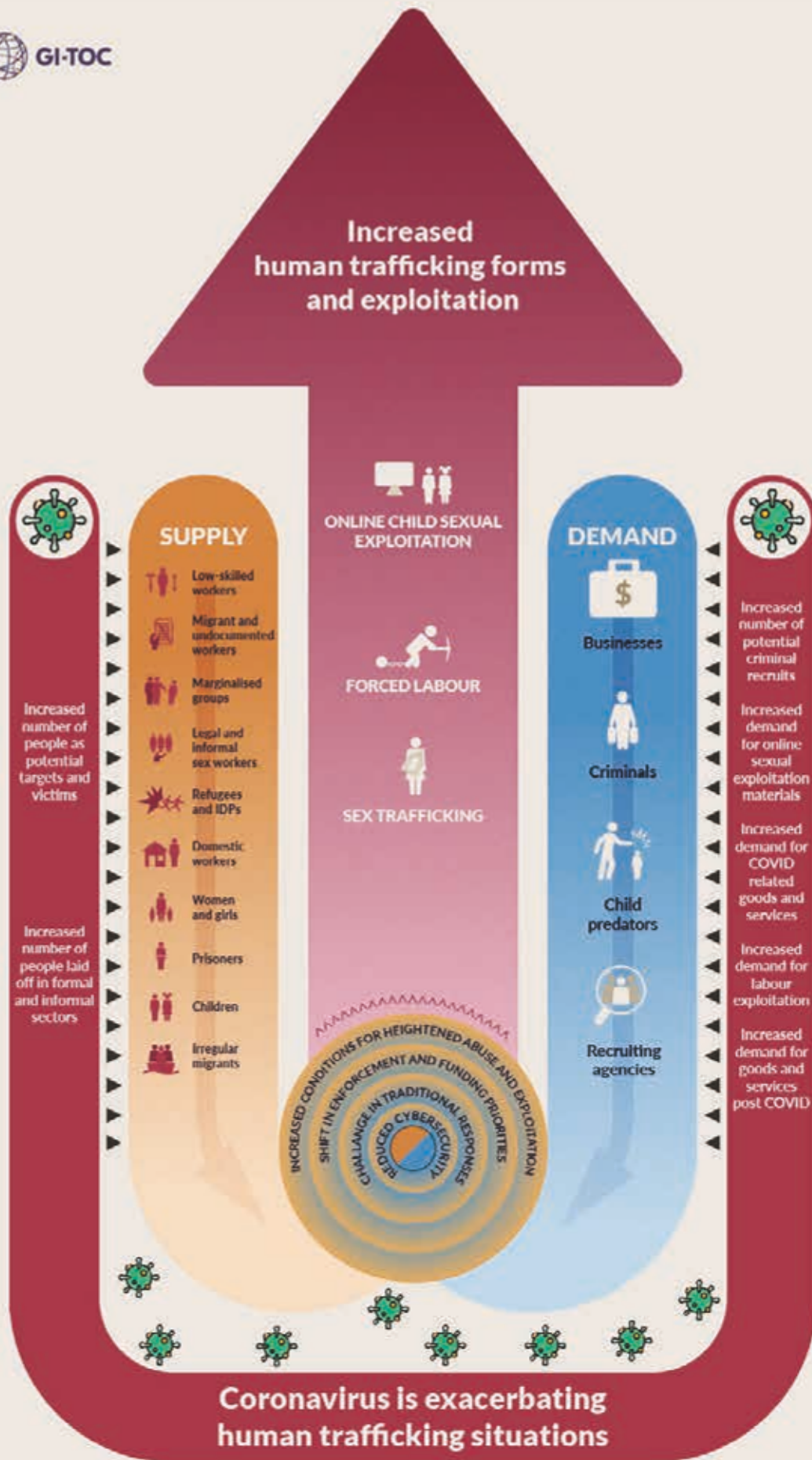
Maintaining order levels, continuing to make payment and in some cases paying in advance.



*“Our focus on business and human rights remains as strong and bright as ever and the intersection between human rights and environmental degradation is stark; ‘we know that hidden crimes of slavery and environmental destruction are not just inextricably linked but mutually reinforcing and reach around the planet. We understand that to save our planet we have to fight slavery, and that to end slavery we have to protect our environment.’ (1) Our continued action in this space is also sharply focused by the pandemic, and we understand that whilst protecting people’s lives is the priority, protecting livelihoods will help us to do it.”*

Martyn Coffey CEO, Marshalls plc

1 Kevin Bales, Blood & Earth: Modern Slavery, Ecocide and the Secret to Saving the World, pg. 242



**Impact of Covid-19 on human trafficking forms and exploitations**

Source: Global Initiative Against Transnational Organised Crime Report, Aggravating Circumstances: How Coronavirus Impacts Human Trafficking

# Covid-19

## MARSHALLS RESPONSE IN TERMS OF MODERN SLAVERY

We have taken the opportunity to publish our annual End Modern Slavery Report later than we would normally in order to undertake a review of our business and human rights activities through the lens of Covid-19 and to understand whether these could be amended or enhanced in the wake of our growing sense of the scale of the virus's impact. This also allowed us time to have detailed conversations with our partner organisations, such as the ILO Child Labour Platform, and the International Organisation for Migration, to understand from their perspective the immediate impact upon workers, their families and communities. In addition we engaged with our peers across sectors and the globe through the United Nations Global Compact and Thomson Reuters Foundation platforms to share and learn in real-time from other international and transnational organisations responding at speed with both the immediate and long term implications and issues as a result of the pandemic. This work is ongoing, but what we can share is that we have brought forward programmes that were in the pipeline for later in 2020.

## TRAFFIK ANALYSIS HUB

Marshalls has just committed to being the first in the construction sector, and one of the first globally, to be a private sector participant in Traffik Analysis Hub. Traffik Analysis Hub is a true collaboration across multiple sectors – law enforcement, third sector, finance, private sector, governments - all united by a common goal to prevent human trafficking and the harm that it does; to individuals, communities, regions, countries, commerce and to humanity. We absolutely recognise that technology has a unique role to play in disrupting human trafficking and that we can only increase transparency by sharing any information that we have, working with a wide range of stakeholders and by developing a deep understanding of the contexts in which our supply chains sit. Private sector must be at this table not only to gain greater insight into the context in which its business operations and supply chains take place, but also to contribute to the data in order to increase transparency. The recent Operation Fort Report\*, launched recently by the IASC office highlights the need for an intelligence led collaborative response. It's time to gear up, shake up the approach, collaborate, share and learn in new and superfast ways. We're leading the charge from the construction sector, leveraging our extensive network and engaging with our sector and encouraging them to come to this table.

*"Marshalls instantly saw the both the enriched global picture of the complexities of modern slavery and human trafficking, and the potential for enhanced transparency which Traffik Analysis Hub makes possible. Marshalls has already connected us with potential partners and collaborators both here in the UK and overseas and will add immensely to our programme in India. This is a company which has walked the supply chain back to raw materials, understands the issues and also the need for all actors to be engaged, sharing information and working together to drive traffickers out of business. I am delighted to have Marshalls on board."*

Neil Giles CEO, Traffik Analysis Hub

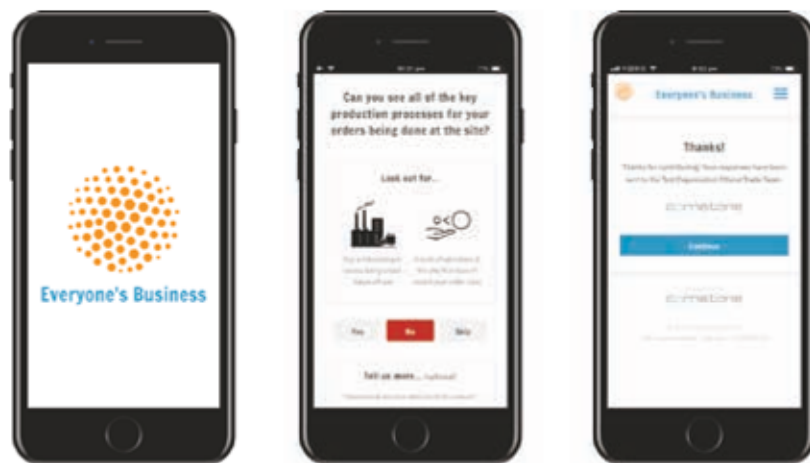
\*Source: <http://www.antislaverycommissioner.co.uk/news-insights/launch-iasc-review-on-operation-fort/>

## EVERYONE'S BUSINESS APP

Marshalls is accelerating the introduction of an innovative tech solution - Everyone's Business – to enable all employees to speedily flag any concerns regarding modern slavery, health & safety, ethical sourcing and the environment. The Everyone's Business app is concise and easy to use with quick read information on the local context and prompts on how to spot potential risk. The wealth of information generated from both our own UK operations and our suppliers and supply chains can be viewed in real time and acted upon promptly.

Whilst there is an ongoing programme of activity devoted to helping suppliers provide decent working conditions and respect human rights, in addition many staff visit suppliers' sites and our own network of UK operational sites frequently. Everyone's Business captures their valuable views and perceptions.

Everyone's Business is currently being used successfully by four leading UK retail brands, and a version for the pharmaceutical industry is in the advanced stages of development. Marshalls will be the first in the construction sector to use this technology and our version of Everyone's Business is being adapted to include a geo-locate function – which is particularly important for our natural stone supply chains where quarries are always in very rural locations across the globe – and also to allow us to include all of our own business sites in the UK.



*"We are driving hard to ensure that human rights is 'everyone's business' at Marshalls – very much like the health and safety message within our business. The accelerated introduction of this app, the training of our employee base in its use, both in the UK and overseas, will give us insights that we simply haven't had before, and the kind that cannot be captured in more formal audit processes. This information will sit alongside other high quality sources of information giving us an enhanced view of both our own business operations here in the UK, and of our global supplier base and supply chains. We will have increased knowledge at speed which will allow us to act promptly and to further enhance our understanding of areas of risk."*

Elaine Mitchel-Hill, Business & Human Rights Lead, Marshalls plc

# Covid-19

## SAFECALL

In addition to both Traffik Analysis Hub and the Everyone's Business app, we are extending the use of the whistleblowing hotline, Safecall, to supplier operations in India, China, Vietnam and Brazil. This will enable workers and other local stakeholders to report issues relating to the working environment and operations in a safe and secure way via phone and web. Marshalls already has Safecall in place in the UK giving employees, contractors, suppliers and other stakeholders a voice; helping to enhance a culture of openness, demonstrating that malpractice is taken seriously and dealt with at the highest level. This additional overseas service will ensure that those within our supply chains have a voice and will provide yet more information upon which we can act decisively.



**Speak Up**

Security, Corruption, Health & Safety, Harassment, Fraud, Unethical Conduct

**If you have a serious concern over wrongdoing at work:**  
Report it to your line manager or HR, or speak to a senior manager, or contact Safecall

**0800 915 1571**  
or report on line at:  
[www.safecall.co.uk/report](http://www.safecall.co.uk/report)

All calls are handled confidentially by Safecall and you may remain anonymous if you wish.

**safecall**  
A totally independent organisation working with  
**Marshalls**  
Creating Better Spaces







# Building Resilience to Prevent an Increase in Slavery

**Martyn Coffey CEO, Marshalls plc**

The effect of Covid-19 on the global economy is leading to widespread unemployment. As a result major sections of the global population are at greater risk of exploitation in forced labour and other forms of modern slavery.

It is clear to us all that Covid-19 has the potential to negatively affect everyone on earth, but what is also becoming apparent is that it does not affect everyone in equal measure. Where livelihoods are in the informal sector, part-time, in developing countries or fragile contexts, or where specific sectors are worst hit, many people simply cannot withstand the economic shock. This extreme economic distress increases the risk of slavery as individuals and families take more risks to support their own survival. Ultimately their increased vulnerability makes them more susceptible to exploitation.

In the wake of Covid-19 there is a need for the private sector to consider how it can and must work to prevent an increase in modern slavery and to build greater overall resilience.

Reviewing, enhancing and accelerating concrete actions regarding UK Modern Slavery Act compliance and commitments is a must. Alongside this business must ensure that the buyer-supplier

relationship enables the respect of workers' rights; that pricing covers full production costs such as the living wage and benefits to all workers. And even before this that human right due diligence for new and existing supply chains is acknowledged as a 'cost of doing business' which absolutely must be factored in. It is also important that businesses now fully engage in the dialogue and drive for mandatory human rights and environmental due diligence laws which will continue to level the playing field, hold companies responsible for preventing abuses within their supply chains and build resilience.

As the crisis begins to pass there is a need to build back better and create economies and communities that value everyone, everywhere. This means considering the needs of people already enslaved as well as those made increasingly more vulnerable to exploitation by the pandemic.



# Sustainable Procurement & the New World

Chris Harrop OBE, Group Sustainability Director, Marshalls plc

Sustainability may be one of the few items which remains firmly on the business agenda in the new world that Covid-19 is carving out. Up-front-and-centre will be sustainable procurement without a doubt. Procurement and supply chain leaders have been on the front line since the World Health Organisation declared a pandemic; helping their organisations cope with the immediate crisis, working to protect the bottom line, working to maintain supply, balancing supply and demand and working to understand the growing and constantly shifting force of Covid-19 on the ground in supply chains around the globe.

This is reflective of our own procurement teams' exhaustive efforts to respond to the immediate sharp decline in sales as the UK went into lockdown, followed by a muted recovery to put enormous strain on numerous businesses across sectors, and many are facing tough business decisions, but now is also a time to show what commitments to responsible business conduct mean in practice. All companies have a baseline responsibility to prevent and address adverse impacts with which they may be involved, and to treat people with dignity.

What is also clear from the plethora of reports from a wide range of voices – including supply chain workers, factory owners, NGOs and IGOs - is that the issues of labour exploitation and modern slavery have been exacerbated exponentially. Those in and around our supply chains who were already

vulnerable are now even more so. Throughout this time I have been incredibly proud of many of our supply chain partners especially our partner in India which has been providing food and supplies to those communities hardest hit by the lockdown in the main quarry areas. You'll see from what you've already read here that we're accelerating our activity to allow us to innovate, work to create a 'visual' supply chain, embrace new technology, use multi-level risk assessments and continue working with our existing partners both in the UK and around the globe. This is not a time to pull back on human rights, but to push out and to do more.

As a UNGC signatory since 2009 the concept of creating economic value in a way that also creates value for society is a mantra to us - indeed this sits comfortably alongside our modus operandi, our 'Marshalls Way' is 'to do the right things for the right reasons in the right way' - but I think we can all now agree that it is not a far off concept or aspiration, but an immediate and legitimate must.

\* Source: UN Guiding Principles on Business & Human Rights  
[https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

# Keeping Human Rights On-Track

## Elaine Mitchel-Hill, Business & Human Rights Lead, Marshalls plc

I know from continually speaking with my peers across sectors throughout the pandemic that many have struggled with the fact that the human rights of some were 'placed to one side' while other more 'business critical' issues took centre stage on the board table. Whilst I fully acknowledge that if you don't have a viable business, then you don't have a business that can work hard to protect and support human rights, there is an undeniable reality that for a good number of businesses the human rights of those down their supply chain was secondary, or off the radar completely, compared to the rights of the humans directly employed.

I know big business to be ultra-smart and easily capable of considering both the impact on and response to those directly employed as well as those throughout its supply chain, but they can only do this from a point of knowledge and understanding. If this evades them, for whatever reason, then they cannot factor this into the survival mix in a meaningful way. For the cynical among us the varied responses we've seen, both on our own doorstep in the UK and overseas, could lead to the conclusion that the private sector is quick to say the right things and make the right noises, but without taking the actions necessary to follow through. It is here that investors have the power to engage more actively and create added momentum, rather than to just walk away.

Covid-19 is the mother of all acid tests for human rights in all respects, none more so than in supply chains. For those committed to preventing modern slavery, as opposed to simply complying with the law, these are challenging times, but also a rare opportunity to expertly and relentlessly seek to weave human rights throughout the fabric of their organisation. There may never be another time like this to act. Everything is different and anything is possible.

The current crisis and the difficulties it presents in getting out into the supply chain, or undertaking

audits of one kind or another, cannot be used as an excuse for any of us to give up ground that we have gained since the introduction of the MSA. It is also a time to look at the shortcomings or limitations of internal processes and procedures and to redesign; to build back better, if you will. I see this as a 'golden time'. With my feet firmly planted on the ground, and with no overseas travel in sight, I have the time and space and the speed - offered by people being available and at the other end of my computer on one platform or another - to move at lightening pace that in the pre-Covid world seemed impossible.

The window of opportunity to systematically reform purchasing practices and underlying business models, to promote sustainable production and livelihoods is here for each of us. This includes reasonable deadlines and planning, fair payment schedules, and fully-costed pricing in order to enable suppliers to eliminate any irresponsible outsourcing and pay workers the living wage, benefits and social protections. Grass roots activity to identify and prevent the risk of forced labour in supply chains. The expanding of whistleblowing channels in high risk supply chains. New ways of carrying out targeted inspections of working conditions in sectors at high risk of labour exploitation and unsafe working conditions. Harnessing technology to improve supply chain visibility and invite new perspectives from different stakeholders. Engaging in new data sharing platforms which lift the veil on the extent of the issues and offer up insights and information that hold the potential to allow us all to be more effective in our efforts. Ensuring that workers are supported in accessing information and protective measures, support and redress. Drawing on the long-term relationships with partners across the globe to share, to learn and to redouble efforts. In short, businesses must not use any financial losses incurred during the Covid-19 crisis as an excuse for labour exploitation and forced labour and must renew efforts.



The trajectory of global modern slavery legislation, developments in UK environmental legislation, together with the incoming EU mandatory Human Rights Due Diligence (mHRDD) Law in 2021 will all demand that businesses ‘... ensure respect for the rights of humans, who should not be sacrificed for the sake of company profits and the accumulation of wealth.’\*

While in a post-Brexit world it is currently unclear what this will mean from a UK Government perspective, businesses with operations, supply and demand chains across Europe already see the implications. What is also clear is that this time and place is a watershed for human rights.

1. UNGPs - <https://www.unglobalcompact.org/library/2>

\*Extract to consider the Human Rights Due Diligence Legislation – Options for the EU

# Impact

## During the past 12 months Marshalls has:

- Continued to ensure that 100% of its employees are exposed to modern slavery awareness training; how to spot the signs, how to report and a clear understanding of Marshalls stance and our approach regarding remediation for victims.
- Maintained and worked with our 7 internal modern slavery ambassadors to further embed this work within the business.
- Ensured that the 349 employees directly involved in supply and demand chain management receive ongoing updates regarding business and human rights, and specifically modern slavery.
- Worked to ensure traceable supplier communication and verification systems confirming acceptance of our Code of Conduct which includes international modern slavery legislative requirements.
- Continued to deepen our working relationships with key suppliers in higher risk geographies, and to work to raise international standards regarding modern slavery and human trafficking – by working with suppliers, UN agencies, UK government, overseas governments and business agencies such as chambers of commerce.
- Worked with the International Organisation for Migration on key assessments in Vietnam.
- Continued to provide intelligence to law enforcement in the UK, including the GLAA, local law enforcement and via the Modern Slavery Helpline.
- Continue with our Power of Logistics transport and logistics initiative within our logistics operations resulting in increased reporting.
- Continued to actively engage in the delivery of a cross-sectoral programme in India with the ILO Child Labour Platform.
- Actively engaged in the GLAA Construction Protocol Platform and worked with the GLAA to develop an extension of its work to include materials and products.
- Again published our modern slavery risk mapping for 100% of our business operations and supply chains.
- Undertaken supply chain mapping for 70% of the highest risk supply chains, by volume.
- Continued an independent assessment which covers 40% of the supply chain identified as high risk, by volume.
- Have in place a process of remediation and support for 60% of supply chains identified as high risk, by volume of product.
- Continued to actively engage with UK and overseas governments to address root causes of modern slavery.





# Modern Slave Implementati Timeline

## November 2016

BRE ELS 6002 audit takes place. MS risk mapping and awareness raising supply chain overseas field visits. Co-host Indian Sandstone Stewardship event, Delhi, India.

## October 2016

Developed pilot education programme with our temporary labour provider; delivered Jan/ March/June 2017.

## September 2016

Face-to-face meeting with key customers to share approach to MS and discuss collaborations.

## December 2016

Development of M-Way Supplier/Employee Code of Conduct.

## January 2017

Global partnership with Hope for Justice announced. Field visits to Vietnam; meetings with British Embassy & NGO's. Intensive training for procurement team. Training and appointment of 1st MS Ambassador. Training and appointment of 2nd MS Ambassador. MS Ambassador delivers MS training to Marshalls Registered Installers.

## February 2017

Appointment of Business & Human Rights Intern. GLAA training at Derby University for Business & Human Rights Lead; Investigating Modern Slavery. Marshalls becomes first organisation worldwide to be BRE Ethical Labour Standard 6002 Accredited.

## November 2017

BHRL & anti-slavery partner visit to Vietnam supply chain & meetings with multi-stakeholders. Shortlisted for Thomson Reuters Foundation Stop Slavery Award.

## October 2017

Marshalls one of first to commit to GLAA Construction Industry Protocol. IPEC CPL meeting Geneva.

## September 2017

WYATN quarterly meeting. 3rd MSA Ambassador Appointed: Commercial.

# ry on

## May 2016

1st MSA Statement published. Connects with local Crime Commissioner & local law enforcement.

## June 2016

Launch of MS internal awareness campaign.

## July 2016

Development of internal protocols regarding MS in UK business operations. Internal online MS training launched.

## August 2016

Joined UNGC UK Modern Slavery Working Group.

## May 2017

2nd MSA Statement Published. M-Way Supplier Code of Conduct published externally. Launch of Marshalls independent IT platform; MS and ABC training for all suppliers.

## April 2017

Development of supply chain modern slavery risk mapping process. M-Way Employees Code of Conduct published internally.

## March 2017

Ethical auditing & modern slavery risk assessment visit to India with anti-slavery partner and independent auditor. Invited to join the West Yorkshire Anti-Trafficking & Modern Slavery Network. Development of Business & Human Rights Yammer Platform internally.

## June 2017

Publication of Marshalls first End Modern Slavery Report.

## July 2017

Publication of Marshalls first MS Risk Mapping Country Profiling. Launch of Ethical Risk Index.

## August 2017

Filming with Supply Chain School to share ethical & MS journey.



**May 2018**

Changing the Narrative for Ethical Specification Event with Baroness Young. 3rd MSA Statement Published. 4th & 5th MSA Ambassador: HR & Logistics Appointed. Marshalls becomes Bright Future Business Partner. MS risk mapping undertaken and shared transparently.

**April 2018**

Development of Power of Logistics initiative. ETI Strategic Report Objectives 2018 – 2020 confirmed.

**March 2018**

ILO IPEC Child Labour Platform meeting in Paris; development of collaborative initiative with global brands.

**June 2018**

MSA Statement, Country Risk Profiling and Second End Modern Slavery Report Published.

**July 2018**

Presented at the Welsh Government event for local authorities regarding MSA implementation.

**August 2018**

Under Cover Human Rights Research in the Kota region of India completed.

**May 2019**

UN International Organisation for Migration programme in Vietnam launched. BHRL presented private sector perspective on human trafficking at the Trilateral Conference.

**April 2019**

Business & Human Rights Lead presents feedback on UK MSA legislation, at the request of Baroness Young of Hornsey, to members of the Commonwealth Parliamentary Association.

**March 2019**

Launch of Power of Logistics 'Spot the Signs & Report' Initiative with the support of West Yorkshire Police & Crime Commissioner and the GLAA.

**June 2019**

Modern Slavery Home Office Construction Leaders Round Table

**July 2019**

APPG Modern Slavery attendance

**August 2019**

Engagement in PACE programme

**May 2020**

Accelerated committed to Traffik Analysis Hub

**April 2020**

Accelerated commitment to Everyone's Business app

**March 2020**

CV19 consultation with suppliers, IOM, ILO, peers, etc.

**KEY**

MS: Modern Slavery  
BRE: British Research Establishment  
ELS: Ethical Labour Standard  
UNGC: United Nations Global Compact

GLAA: Gangmasters Labour Abuse Authority  
ABC: Anti-Bribery & Corruption  
BHRL: Business & Human Rights Lead  
CLP: Child Labour Platform  
WYATN: West Yorkshire Anti-Trafficking Network



**February 2018**

Marshalls achieves BRE Ethical Labour Standard 6002 Accreditation for the second year running.

**January 2018**

Belgian business operations briefed on MS by BHR Lead & Group Procurement Director. Presentation with anti-slavery partner to UNGC MS Working Group to share progress & challenges.

**December 2017**

BHRL & anti-slavery partner visit to Indian supply chain & meeting with multi-stakeholders.

**September 2018**

Series of Awareness Raising Roadshows; Spot the Signs, begins across multiple UK sites running over 3 months.

**October 2018**

Marshalls invited to speak to the Westminster Round Table on Modern Slavery & Transparency feeding into the review of the MSA.

**November 2018**

Participation in pilot for BITC Responsible Business Tracker focusing upon Modern Slavery & Human Rights.

**February 2019**

Marshalls commits to support DfID programme aimed at eliminating the worst forms of child labour in fragile contexts.

**January 2019**

Marshalls celebrates 10 years of being a UNGC signatory and working to support and uphold the principles of human rights, labour rights, anti-bribery and corruption.

**December 2018**

Supplier engagement meetings regarding MSA.

**September 2019**

PACE learning event Turin

**October 2019**

India ILO CLP India

**November 2019**

British Embassy event  
Vietnam event

**February 2020**

Private sector roundtable - Overseas development aid and modern slavery consultation

**January 2020**

Engagement in UK government think tank

**December 2019**

CRPB programme agreed

# 2020/21 KPIs



Develop strategic collaborations/partnerships/initiatives to identify, prevent and mitigate human rights abuses in Marshalls own business operations and supply chains, to build capacity/engagement/collaboration in the wider construction sector, and seek to make a societal net positive impact.

- Engage with governments and government agencies both in the UK and overseas to share knowledge, agree root causes, overcome challenges and raise awareness of international supply chain transparency standards, and engage in long term capacity building partnerships.
- Continue to actively engage in the Bright Future programme – now as a founding member of the Bright Future Co-operative – offering placement and recruitment opportunities to survivors of modern slavery.
- Continue with the multi-stakeholder programme in Vietnam; lead by the IOM.
- Maintain our active engagement with ILO Child Labour Platform.
- Actively seek the expansion of Marshalls Power of Logistics Programme by engaging other businesses with significant logistics operations.



Implement appropriate remediation and support programmes for victims of modern slavery identified within the organisations operations and supply chains.

- Have in place a solid and appropriate process of remediation and support for 72% of the supply chain identified as high risk by volume of product; from India and Vietnam.
- Continue to develop and implement forced labour/modern slavery identification and remediation processes in Marshalls UK business operations, and in supply chains in India, Vietnam & Europe.



Overhaul and further improve the organisation's supply chain due diligence, internal and external ethical auditing programme and modern slavery risk mapping assessment processes – using this process to embed human rights as 'everybody's business' within Marshalls - in order that instances of modern slavery can be identified, remedial action undertaken, and the victims supported and that all of this is transparently reported.

- Continue to publish annually modern slavery country risk mapping profiles for 100% of sourcing countries.
- Enhance internal processes and procedures, for 68% of all supply chains (by volume) identified as high risk, which allow Marshalls to effectively assess actual and potential human rights risks and the effectiveness of ETI Base Code implementation in its business operations and global supply chain.
- Develop and implement human rights monitoring, reviewing and reporting processes; report transparently on all efforts to respect human rights and prevent forced labour/modern slavery and utilise to inform business decision making, due diligence processes and improve conditions for workers'



Report, as appropriate, on our efforts and effectiveness in helping to ensure that modern slavery and human trafficking is not taking place in our business or supply chains including our due diligence processes.

- Reporting/identifying instances of modern slavery in our business operations and supply chains.
- Intelligence shared with law enforcement, GLAA, GLAA Construction Protocol, Anti-Slavery partners, Traffik Analysis Hub and others.
- Reporting in line with our participation in the Dutch/Flemish Trustone responsible sourcing initiative.
- Producing our annual Modern Slavery Statement as required by UK law.
- Producing our annual Country Sourcing Risk analysis.
- Producing our annual End Modern Slavery Report detailing our activity/progress.



Continue to develop our supplier communication and verification programme which allows Marshalls to engage with suppliers on a deeper level regarding the implementation of its Modern Slavery Act commitments.

- Continued implementation of Marshalls supplier engagement programme: ProActis Supplier Management Platform, including BRE 6002 assessment process.
- Supplier education partnerships with 100% of those identified as high risk through our modern slavery risk mapping processes and supplier engagement programme.
- Proactive modern slavery education programmes with those suppliers who have identified issues or expressed concerns.



Maintain consistent delivery of a modern slavery & human trafficking awareness raising programme with key stakeholders.

- Ensure that 100% of employees are exposed to modern slavery training; how to spot the signs and how to report safely.
- Ensure that all inductions for temporary labour include modern slavery training.
- Work with our temporary labour provider/s to ensure compliance to our code of conduct and appropriate legislation; ensure full engagement with the modern slavery agenda backed up by robust processes and procedures.
- Post Covid-19 re-launch our internal enhanced Modern Slavery Ambassadors programme.
- Ensure that key individuals involved in supply and demand chain management continue to receive additional training regarding modern slavery and human trafficking.

# Focus on India

## Cross Sectoral Collaboration

As an active member of the ILO Child Labour Platform we continue our long term efforts to eradicate child labour. This platform continues to offer a space to press for the systemic change that is required, highlight issues on the ground, share supply chain knowledge and challenges with peers from around the globe and to consider how the private sector can best collaborate to underpin the efforts of other stakeholders.

We remain fully engaged in the ILO Child Labour Platform multi-stakeholder programme in India, together with other global brands from different sectors who source heavily from the country. For our part we also continue to facilitate conversations between the ILO Child Labour Platform secretariat and other actors where there is overlap, common ground and/or new developments; seeking to add value through intelligence, the opportunity to collaborate and help ensure that progress can be made.

*"Marshalls' persistence and long term active engagement as part of the Child Labour Platform is acknowledged and much appreciated. Marshalls openly share challenges and issues in a manner which encourages others to do the same and brings much energy to the current cross-sectoral collaboration programme under development in India."*

Katherine Torres, ILO Senior Specialist on Fundamental Principles and Rights at Work.



International  
Labour  
Organization

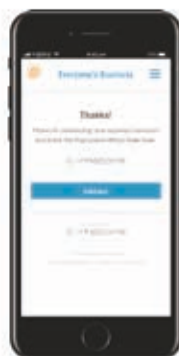
ALLIANCE







We will also be undertaking enhanced modern slavery training throughout our supply chains in India over the coming months, introducing the use of the Everyone's Business App, implementing the Safecall whistleblowing hotline as well as engaging with Traffik Analysis Hub as the organisation embarks upon a special programme to collect data from a wide range of actors and sourced to help better understand the scale of human trafficking and its impact – including on supply chains.



**Traffik Analysis Hub**



# Focus on Vietnam

## Focus on Vietnam – Multi-Stakeholder Programme

In the past 12 months we have been very active in Vietnam alongside our partner the International Organisation for Migration, a UN agency. The initial project sought to understand the modern slavery and human trafficking risk in the natural stone sector. The assessment findings have informed the design of an action programme to prevent and eliminate modern slavery and human trafficking, contributing to enhancing Marshalls' global commitment to address the issues. Covid-19 has slowed implementation, but we aim to begin roll out in the autumn. This involves enhanced training for our suppliers and also an awareness programme in the local community. In addition we will also implement the Everyone's Business App and the Safecall whistle blowing hotline.

In November 2019 we were invited to speak at a British Embassy event in Ho Chi Minh to share perspectives on supply chains transparency and the issue of modern slavery and human trafficking. The event came only days after the discovery of the bodies of 39 Vietnamese victims of trafficking in the back of a lorry in Essex. The event was timely, although obviously very difficult. The fact that it went ahead is a clear indication of the commitment by the British Embassy and Vietnamese government to continue to work to raise awareness and address the issues.



# Focus on the UK

In the UK we continue to actively engage with a wide range of external stakeholders through key initiatives as well as driving understanding and action through our army of Modern Slavery Ambassadors throughout our business operations. Over the coming 12 months, and in the wake of Covid-19, we will re-launch the ambassadors programme with the aim of increasing them in number.

## The Bright Future Cooperative

The Bright Future Cooperative has been established. We've been involved since its inception in 2017 and Marshalls now sits as a board member since its evolution into a cooperative in 2019. Bright Future offers the opportunity of a paid work placement and a job to those who have been rescued from modern slavery. We remain committed to continuing to offer placements and jobs within our UK operations to survivors.

## CCLA Find it, Fix it, Prevent it

Our Business & Human Rights Lead, Elaine Mitchel-Hill, sits on the Advisory Committee for this coalition of investors committed to promoting effective corporate action on modern slavery. A core part of the project is direct investor engagement with companies with the aim of driving better policies and processes for addressing slavery, and more effective action in terms of prevention and remediation.

*"We know from numerous cases, including the recent Operation Fort, that modern slavery exists in the supply chains of everyday brands. Given the prevalence of these reports both in the UK and internationally we are convinced that modern slavery exists in the supply chains of most, if not all, businesses. As investors, at CCLA we are supportive of companies that acknowledge this situation and work to improve matters. Best practice is for companies to search for and find instances of modern slavery in their supply chain, provide support for those being exploited and seek to prevent further instances taking place."*

Andrew Adams, CCLA's Lead on Modern Slavery

## **The Partnership Against Child Exploitation**

<https://www.pace-consortium.org/project>

The Partnership Against Child Exploitation (PACE) is a ground-breaking partnership of private sector, academic, media development and civil society organisations working together to combat the exploitation of children in the worst forms of child labour. As part of the consortium the UN Global Compact Network UK is using its global convening power to engage the private sector and share best practice in preventing and reducing the worst forms of child labour. UNGC UK is leading on the work being done to better understand and document how the informal sector feeds into formal supply chains, with a view of how this potentially undermines any positive impact of private sector efforts to eliminate the WFCL. The Private Sector Strategic Advisory Group, which is part of the programme, is chaired by our Business & Human Rights Lead, Elaine Mitchel-Hill.

## **Focus on Trustone**

<https://www.imvoconvenanten.nl/en/trustone/initiatief>

The Dutch and Flemish natural stone sector have reached agreements with the Dutch and Flemish governments, NGOs and trade unions concerning the more responsible production and purchase of natural stone; the TruStone Initiative. This programme aims to focus attention on International Responsible Business Conduct and sustainable chain management. Marshalls, with operations in Belgium, was one of the first companies to become a voluntary participant to this initiative. Participation involves providing evidence of human right due diligence and supply chain mapping and working in collaboration with others in the sector to drive change. The overall aim is to deliver tangible results for disadvantaged groups in the next five years. In particular, the initiative will address the following themes: discrimination and gender, child labour, forced labour, living wage, right to organise and right to collective bargaining, health and safety, land rights and the living environment.



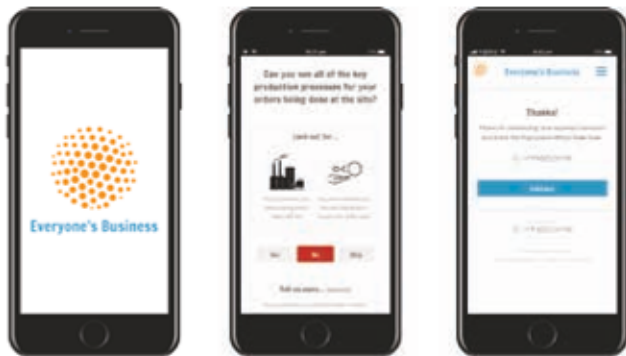




# Focus on China

## Focus on China – Multi-Stakeholder Programme

Marshalls has an office in China which undertakes continuous auditing activity. The focus now is on enhanced training for all staff, and the implementation of the Everyone's Business App which will enable information to be shared speedily and in real-time. Our team in China will also facilitate the roll out of the Safecall whistleblowing hotline.



## Top 5 Countries According to the Marshalls Modern Slavery Risk Mapping & Country Profiling

1. Egypt (Risk Score 0.47)
2. Vietnam (Risk Score 0.49)
3. India (Risk Score 0.53)
4. China (Risk Score 0.54)
5. Brazil (Risk Score 0.58)

Risk Score is rated 0 - 1. The higher the score the lower the risk.



# PRACTICAL TIPS ON WHAT TO DO IF YOU SOURCE GOODS FROM THESE COUNTRIES

## **Be smart and analyse**

Use internal data alongside publicly available modern slavery mapping, trends and analysis. Look at this in the light of your own procurement data and financial information, goods categorisation and anything else that you have that is useful. Use this to help focus your efforts by identifying top priorities; it can be overwhelming otherwise.

## **When you can, get out into your supply chain often**

Walk your supply chain, map your supply chain, don't rely on audits; do them by all means but do other things as well. Nothing beats seeing things for yourself, repeatedly.

## **When you can't get out to walk the supply chain for yourself make sure you have robust relationships and innovative processes**

Make a point of building strong in-country relationships and networks with a wide range of trusted actors, so that you can call on them when you need to. Engage fully with innovative IT platforms working with all key stakeholders to collect and share information regarding modern slavery and human trafficking; make a point of contributing to the data as well as utilising the analysis. Use a wide range of IT solutions to keep the conversations going and keep visibility of what's happening on-the-ground.

## **Educate, engage and empower employees as a priority**

They are the eyes and ears. When they understand the issues and how to spot and report they have the means and heart to do what is right. They will ultimately be the ones to keep slavery out of business operations. Make it simple for them to report in the best way and keep themselves and the victim safe in the process.

## **Engage with suppliers in a meaningful way - but remember one size absolutely does not fit all**

Re-framing modern slavery is often necessary; in India it may be about working with the sector to ensure that it is world class; in Vietnam, focusing upon forced labour and making industry more competitive as a result is a key driver. You will find that the language of modern slavery will need to be adaptable in order to get traction.

## **Find & fix**

There is a window for applying a 'find & fix' approach so use it! A dogged and investigative approach pays dividends and talking to different and new partners in sourcing countries brings fresh thinking. Put down your framework, tool kits and protocols – you know enough - get out into business operations and supply chains; discover through active engagement, asking searching questions and challenging, where and how you can find leverage. Make it count at grass roots level; learn from mistakes and try new measures. Be prepared to roll-up your sleeves.

## United Kingdom

0 (Low Scoring): 1 (High Scoring)



0 (Higher Risk): 1 (Low Risk)

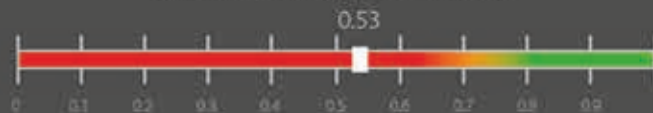


## India

0 (Low Scoring): 1 (High Scoring)



0 (Higher Risk): 1 (Low Risk)



# China

0 (Low Scoring): 1 (High Scoring)



0 (Higher Risk): 1 (Low Risk)



# Vietnam

0 (Low Scoring): 1 (High Scoring)



0 (Higher Risk): 1 (Low Risk)



## Statement of Verification

ELS Number: 0001

Issue: 05

This is to verify that evidence of  
**Ethical Labour Sourcing**  
provided by:  
**Marshalls plc**



is in accordance with the requirements of:

**BES 6002: 2018**

and

**BRE Global Scheme Document SD235**

Marshalls plc has provided evidence that it has met or exceeded the baseline requirements of BES 6002 and has an on-going commitment to improving ethical labour sourcing practices in its own business and supply chain.

### Company Address

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# Marshalls

*Creating Better Spaces*

The attached Appendix forms part of this Statement of Verification.

Signed for BRE Global Ltd

John Holden  
BGM

6 March 2020  
Date of this Issue

6 March 2017  
Date of First Issue

5 March 2021  
Expiry Date



This Statement of Verification is issued subject to terms and conditions (for details visit [www.greenbooklive.com/terms](http://www.greenbooklive.com/terms)).

To check the validity of this verification please visit [www.greenbooklive.com/check](http://www.greenbooklive.com/check) or contact us.

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# Further Reading

All of the following can be found within the documents section of our website:

<https://www.marshalls.co.uk/sustainability/document-library>

Marshalls Modern Slavery Statement 2020

Marshalls Modern Slavery Country Risk Profiling 2020

United Nations Global Compact Communication on Progress Report 2019

Human Rights Policy

Marshalls Code of Conduct



Marshalls

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