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MARSHALLS VISION

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Create Better Spaces and Futures for Everyone; Socially, Environmentally and Economically.

How we do things is just as important as what we do. The Marshalls Code of Conduct clearly lays out what we expect of our people, our suppliers, our partners and our stakeholders when it comes to doing business in the right way.

Why having a Code of Conduct matters to Marshalls

We have a long and proud history. The way we do business has always set us apart. Our brand reputation, and the externally recognised accolades we have achieved, show exactly who we are and what we stand for. We expect high standards in everything, and the Marshalls Code of Conduct clearly outlines these standards.

The Marshalls Code of Conduct brings together our company policies, and the laws and regulations that apply to our business.

While our Code of Conduct provides sound guidance, it won't cover every situation, so if you're ever unclear you should always seek help. For each part of our Code of Conduct we have provided details of where you can get further support.

A MESSAGE FROM MARSHALLS CHIEF EXECUTIVE

"Creating Better Spaces and Futures for everyone is about much more than the products we offer...

...it's our promise that we'll do what's right for the people we work with, the communities we work in, and the countries where we operate.

I want there to be no doubt about how we work at Marshalls. The Code of Conduct makes it absolutely clear what we expect of our colleagues, and our suppliers, partners and stakeholders. We all have a responsibility to ensure we do business in the right way.

If you find any of our employees, suppliers, partners and stakeholders falling short of our commitments we want you to tell us. When it comes to challenging practices or behaviours that don't meet our high standards, you will always have our full support."

Martyn Coffey

With over 130 years' experience, Marshalls are the UK's No.1 hard landscaping supplier. As a British brand we take great pride in supplying some of the UK's most prestigious locations, including Trafalgar Square.

EXPECTATIONS OF INDIVIDUALS

Our leaders

We trust our leaders to make the right decisions on behalf of our business. Our leaders set the tone for their teams, and through leading by example, they ensure our people never compromise on our values and the way we do business.

In everything that you do or see, take a moment to pause and ask yourself:

- Is what you're seeing inline with the Marshalls Code of Conduct?
- Does it feel right to you?
- How might something look to an outsider?

If you're not sure you can answer these questions confidently, please always seek support.

Our suppliers and partners

We carefully select our suppliers and partners because we know they share our beliefs. They are an extension of our business and our brand.

Our people

We expect our people to hold those they work with accountable for ensuring actions and decisions are always in-line with our Marshalls Code of Conduct.

Where there is a concern, we want any person or organisation we work with to feel comfortable that they can tell us. We want you to hold us accountable for what we've committed to in this Code of Conduct, just as we will hold you to account.



OURVISION

is to Create Better Spaces and Futures for Everyone; Socially, Environmentally and Economically.

OUR CONTINUING MISSION

is to deliver sustainable growth through a brand that drives customer specification of innovative product solutions for the built environment.

THE MARSHALLS STORY

We believe in doing business differently. We're not here just to create and sell the highest quality products. We exist because we fundamentally believe in our vision to Create Better Spaces and Futures for Everyone.

Our passion and pride propel us to lead the market on developing sustainable and innovative products so that we're a preferred and specified brand. To match a high performing operation with logistics excellence so we can deliver the best customer experience. To spot and act on market opportunities through selective acquisitions. And, to provide a digital experience that balances the new with the traditional. This is our strategy, built on 130 years of strong principles.

We work together, as one Marshalls team, doing the right things, for the right reasons, in the right way. When we **Act With Courage** and **Inspire With Purpose** then we can help **Shape The Future** so that we **Win Together**. This is how we demonstrate The Marshalls Way, as part of one Marshalls team.



THE MARSHALLS WAY

We do the right things, for the right reasons, in the right way. Because this is The Marshalls Way of doing business, which has enabled us to become the UK's leading hard landscaping manufacturer. But, what do all these things really mean to us?

For our Marshalls people it means working together as one team, guided by strong principles, to operate in the most ethical and sustainable ways. We all understand that when we **Act With Courage** and **Inspire With Purpose** then we can help **Shape The Future** so that we **Win Together**. It's The Marshalls Way!

We Act with Courage by taking responsibility for every action. We persevere and face things head on with a 'can do' attitude. We're proud of our depth of experience, but we're humble enough to never stop learning.

We Win Together by continuously developing our business and our Marshalls people. We strive to meet the needs and expectations of our customers and stakeholders. We break down boundaries by proactively proposing solutions, and we do this together with respect for each other. We set clear expectations for those we work with and for ourselves. We Inspire with Purpose, letting our passion and pride shine! We're motivated by our own high standards to deliver market leading quality to customers. We know that brilliance comes from every single one of our people being able to contribute to our vision of Creating Better Spaces and Futures for Everyone.

Operating in the most ethical and sustainable way is a commitment we make to our customers, partners, stakeholders and the communities where we operate. We keep this commitment by considering the long term impact of every decision we make. We recognise that we can Shape the Future by putting people, communities and environment first. We don't take our lead from change, we initiate and embrace change.

This is the right way, this is The Marshalls Way. We expect all colleagues to demonstrate this in everything they do.

At Marshalls we...

Do the right things

For the right reasons

In the right way

Go home safely

...this is the Marshalls way

HEALTH AND SAFETY

Good Health & Safety is not about policy or guarding, it is a state of mind. Therefore good safety does not have to be expensive but the outcome is priceless.

John Davies Health, Safety & Environmental Director

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Anyone who works for or with Marshalls must pro-actively support and promote a safe working environment at all times by:

- Putting physical and mental wellbeing of themselves and others firmly at the centre of everything they do
- Take the lead by challenging unsafe behaviour and pro-actively promoting a safe working culture for everyone to work in
- Support those who challenge unsafe practices, and hold people to account
- Ensure that everyone is involved, informed and fully engaged in good Health & Safety practices
- Report potentially unsafe incidents, report all injuries , and support full investigations to learn lessons from any incidents or injuries
- Come to work in a fit condition to perform their job, free from the influence of alcohol or illegal drugs in line with our Drug and Alcohol policy. This policy applies to anyone who works for Marshalls, or is working at any Marshalls premises.

We recognise that our employees are our most important asset. We are committed to ensuring the health, safety and wellbeing of everyone who works with or for us.

If you see something that risks the safety of anyone, please let us know.



PROCUREMENT ETHICAL AND SUSTAINABLE

The Marshalls Code of Conduct reflects our absolute commitment to ethical and sustainable procurement practice.

We'll only do business with responsible suppliers and contractors who can demonstrate:

- A clear understanding of their supply chains; especially their areas of risk
- Commitment to quickly making things right when they go wrong
- Robust monitoring of processes and procedures
- And, where the rights of others have been breached, ability to make ure swift and meaningful resolutions are delivered.

"In an increasingly globalised and interconnected world, Marshalls understands that modern supply chains can have a significant impact on not only our own operations, but also on society and the environment. It's never been more important to understand how what we do impacts on communities and on the environment.

> Our approach to procurement is to balance economic requirements with environmental, social and ethical considerations over the whole life cycle of all purchases for the entire Group. Operating this way allows us to make informed and balanced business decisions throughout the supply chain.

> We only work in partnership with suppliers that share our beliefs and recognise their responsibility to protect the environment and to champion good relationships with their employees and local communities.

The Marshalls Code of Conduct serves as a guide for our buyers and technical team, as well as our current and future suppliers."

Richard Beale Group Supply Chain Director

PROCUREMENT ETHICAL AND SUSTAINABLE: WORKING TOGETHER

Working Together to deliver 'best value'

We're absolutely committed to improving the economy, efficiency and effectiveness of everything we do. All procurement decisions are based on best total value principles, and with propriety, regularity and legal obligations front and centre.

Obtaining 'best value' means purchasing all materials, goods and services at the optimum combination of 'whole life costs' and benefits.

To fulfil the needs of our external customers as well as internal requirements, we'll always approach a purchase with more than just cost in mind. This includes:

- The initial investment
- The quality of the goods or services provided
- The reliability and responsiveness of the supplier
- The account management
- The supplier's willingness to share risk or provide resource
- The speed at which a product is available
- The efficiency and ongoing revenue and resource considerations



Working Together

Our Code of Conduct applies to everyone in our end-to-end supply chain. We'll only do business with those whose standards are consistent with our own, and who share our values.

This includes joint venture and business partners, commercial customers, sub-contractors, consultants and all suppliers of goods and services.

When we work together, we expect you to monitor your supply chain to the same standards as this code of conduct.



Marshalls complies with all applicable trade laws. Marshalls' requirement is that suppliers must comply with laws governing human trafficking and slavery and reserves the right to immediately investigate any discovered instances of non-compliance with our Code of Conduct.





Suppliers and Partners: the commitments we make to each other in our business dealings:

- 1. We are honest and transparent
- 2. We support diversity, human rights and treat everyone equally
- 3. We regularly, fairly and openly evaluate our own performance and the performance of others
- 4. We meet our obligations of corporate responsibility
- 5. We keep our promises and fulfil the commitments we make openly, honestly and when we say we will
- 6. We work to resolve any issues as quickly as they arise, and inline with the Marshalls Code of Conduct
- 7. We communicate truthfully, clearly, regularly and on time

PRINCIPLES //

Transparency

We aim to make procurement processes as transparent as possible. Working within commercial and legal requirements, including the relevant level of confidentiality of information. We give all potential suppliers a fair and equal opportunity to win Marshalls business. We ensure we're always clear on procedures, timescales, expectations and the criteria for making a selection.

Competition and Collaboration

When it comes to managing supplier relationships, we'll do this in a way that encourages both competition and collaboration. We believe that healthy competition delivers innovation and better service from our supply base, delivering the best long-term value to us and our customers. We also believe that collaboration with our selected suppliers allows us to access a supplier's core capabilities and resources to support us in creating value for our customers.

The approach we take is always determined by balancing what's best for our business & our customers, supply market dynamics, supplier capability and compatibility with Marshalls to deliver best value.



Sustainable Sourcing

We see sustainable sourcing as an essential part of how we work. It helps us to make properly informed and balanced decisions when purchasing products and services. It means getting best value for money while ensuring we take into account the environmental, social and ethical aspects over the whole product or service lifecycle.

We'll only do business with responsible suppliers and sub-contractors who understand the nature of the products, materials and services they are supplying. And, only with those who recognise their responsibility to protect the environment and manage good relationships with their employees and local communities.

We assume responsibility towards the communities and environments in which we operate, towards our employees, business partners and society in general.

- We do business with the highest degree of integrity and ethics
- We comply with all legal requirements of the countries where we do business
- We respect the United Nations Universal Declaration of Human Rights and recognise our responsibility to observe those rights towards our employees and the communities in which we operate

We expect all suppliers and sub-contractors to manage the environmental and social impacts of their business operations. Suppliers and sub-contractors should, where appropriate, adapt their business practices to ensure that they meet with our Code of Conduct. Our supply chain has our full support in working towards compliance.

Marshalls has achieved the BES 6001 accreditation for the responsible sourcing of Construction Products and BES6002 for Ethical Labour Sourcing.

Legality

The way we do business must always comply with all applicable laws and regulations. We are bound by



UK and European law and may also be bound by the laws of any other country in which we do business. We will not be a party to, or tolerate, the evasion of income, sales or value added taxes, customs duties or other charges. We fully comply with all anti-bribery and corruption legislation.

Contracting **Terms & Conditions**

Marshalls is committed to honouring its contractual obligations to suppliers and sub-contractors including:



- Paying in-line with agreed payment terms
- Maintaining an effective grievance procedure
- Respecting the commercial confidentiality of information received

UNMISTAKEABLE MARSHALLS QUALITY

Our Group Quality Policy Statement sets out the high standards that we apply to the production of Marshalls products.

All of our products are designed, manufactured and procured to the required British and/or European Standards, or other customer requirements. We also ensure Marshalls products are independently certified and Kite marked where applicable.

We make this commitment to the quality of our products because we know our customers trust us to deliver the highest standards. We will never compromise on product quality.

Our quality values:

- Quality and safety always come first
- Quality is everyone's responsibility and we are all accountable for it
- We will never knowingly allow sub-standard or defective products to reach our customers
- We know and understand the standards and specifications for our products, and ensure that we meet or exceed them
- We will always look for ways to improve the quality of our products and reduce waste



Group Quality Policy Statement

You can find a copy of our Group Quality Policy Statement by scanning this QR code:

For IOS, open your camera and hold it over the QR code. For Android, download a QR reader app to scan the code Your phone may take you to the webpage automatically, or a linked box will appear on the screen – click the link

OPEN AND FAIR COMPETITION

We believe in open and fair competition. We'll only ever seek a competitive advantage through fair and lawful means.

Competition and Anti-Trust Laws

Over 100 countries around the world have developed competition or antitrust laws. They prohibit a variety of business practices that restrict free and fair competition, such as bid rigging, price fixing, cover pricing or market sharing. They differ by country and can be very complex. Violations of these laws are very serious, and can result in significant fines, other penalties, debarment, and even prison.

We want to compete in a marketplace that is fair, open and honest, and we want everyone to know this is how we will always behave. Our policy is to comply with competition and anti-trust laws wherever we do business, and we expect you to do the same. Companies that compete fairly and responsively are companies who will survive and prosper.

We want to work with strong suppliers and partners who succeed on the merits of their service offering, not by resorting to unfair tactics to gain improper advantage.

Never share with us:

Information you receive from or about our competitors or their bids
The bids you make to our competitors.
You suffer too if we have to withdraw from a bid as a result

Always:

- Report anti-competitive behaviour if you see it or suspect it
- Return immediately any confidential information you should not
 - have received

ANTI-BRIBERY AND CORRUPTION

We do not tolerate the offering, giving, requesting, receiving, or acceptance of bribes in any form.

A bribe is the giving or receiving of something of value with the intention of influencing an individual, company or public body to perform improperly. This may include showing favouritism, acting in bad faith or acting in a way that is inconsistent with a position of trust. Bribes include facilitation payments, kickbacks and any other reward, favour or payment.

In the case of a foreign public official, we do not allow any form of payment or other reward in order to influence them into giving an advantage to our business, whether or not it is intended to induce improper performance.

"Never offer, give or receive bribes, or make or accept improper payments to gain new business, keep existing business, or secure any improper advantage. Never use or permit others to do such things for us. This includes any type of facilitation payment, large or small, even where such payments are perceived as a common part of local business practice or acceptable under local law. The help, advice and local knowledge of agents and other consultants or contractors can sometimes be essential. However, we require them to operate at all times in accordance with our standards. Think, if something could appear to be wrongdoing on any level, you must always avoid it and report it to us."

Cathy Baxandall Group Company Secretary and General Counsel



If you see something that isn't inline with our policy, please let us know:

You can find details on how to report your concerns at the back of this document.



Anti-Bribery Code

Find out more about Marshalls Anti-Bribery code by scanning this QR code:

For IOS, open your camera and hold it over the QR code. For Android, download a QR reader app to scan the code Your phone may take you to the webpage automatically, or a linked box will appear on the screen – click the link

FRAUD, DECEPTION AND DISHONESTY

We will not defraud or deceive anyone or act dishonestly. We will protect our business against fraud of any kind.

The definition of fraud varies from country to country, however it always involves deception and dishonesty. It's fraud when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of material advantage, or involve anyone else to do so.

Fraud is usually carried out for profit, or to receive money, property or services unjustly. It can involve defrauding the company or a third party. It is a criminal offence in most countries. In some countries, like the UK and US, you can in certain circumstances be prosecuted just for being careless or reckless in letting it happen, even though you didn't deliberately set out to commit fraud yourself.

Never knowingly seek to gain an advantage of any kind by acting fraudulently, deceiving people or making false claims, or allowing anyone else to do so on your or our behalf. This includes defrauding or stealing from the company, a customer or any third party, and any kind of dishonest use of another's property.

False Claims

This kind of fraud also includes knowingly or recklessly misrepresenting or inaccurately recording time spent or materials or services provided, and concealing defects or fabricating evidence - even if the client requests or supports what we are doing.

Always act honestly, fairly and openly, carefully checking or inspecting things that are your responsibility.

We will not claim for something we don't honestly believe we are entitled to, and we will support all claims with transparent documentary evidence.

If you think something might be wrong, it probably is. If you suspect something might involve fraud or deception, please tell us.

You can find details on how to report your concerns at the back of this document.

FAIRTAX

We're proud to be fair tax credited and to pay our fair share of tax.

The Fair Tax Mark is the label for good taxpayers. Wherever you see the Fair Tax Mark you can be sure that a company is open and transparent about its tax affairs and seeks to pay the right amount of corporation tax at the right time. It sets standards in responsible tax practice.

Fair Tax Mark commented, "We welcome Marshalls' engagement and eagerness to speak out about this issue. A fair and transparent tax system is at the heart of any society. A fair tax system is essential to a vibrant mixed economy that works for the benefit of all who live in a country. It is also crucial to a healthy, functioning democracy. 'Fair' is a subjective term that is open to a wide range of interpretations. In our opinion when it comes to corporation tax 'fair tax' means that a business seeks to pay the right amount of tax, but no more, in the right place at the right time and can be held to account on its tax behaviour by the public based on the information it publishes."



"Marshalls is a United Nations Global Compact signatory and has been for more than ten years. As such we have made public commitments regarding human rights, labour environment and anti-corruption. The organisation is clear that adhering to the Fair Tax Mark criteria is all part-and-parcel of being a sustainable and responsible business."

Martin Coffey Marshalls CEO



Fair tax

Find out more about Fair Tax by scanning this QR code:

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- DON'T SPEAK FOR US

To maintain our brand reputation, it is vital that information shared about us is authentic, consistent and complete.

We're really proud of our Marshalls brand. We work hard to protect and promote our good reputation. We know that a misjudged comment, share or reply can have an impact on our business. So, please think before you post anything online or reply to any requests for information.

We have a number of official spokespeople across the business who are able to talk on our behalf publicly. Unless you are authorised to do so, please don't make any public statements on our behalf, either to the media or online.

Putting it into practice

- All media enquiries/public requests for information need to be forwarded to the Marketing Department on 01422 312 000
- Any request for Financial Information will go to the **Finance Department on 01422 312 000**
- For our people, we have a Social Media policy which we require everyone to be familiar with. The Social Media policy is available on our internal intranet.

In summary, while we're happy for positive and non-confidential information about any work with Marshalls to be shared online, we ask that you:

- Don't bring the company into disrepute
- Don't share confidential information about our suppliers or customers
- Don't breach copyright (e.g. use someone else's content without permission)
- Don't post anything that could be considered discriminatory, bullying or harassment of any individual or group of individuals





ROTECTION AND GDPR KEEPING ACCURATE RECORDS

When it comes to data protection, General Data Protection Regulation (GDPR) and keeping accurate records, we recognise that we have been trusted to handle and store personal data. Whether the data is about our people, customers, partners or stakeholders, it's our responsibility to look after personal information.

Personal data is classed as any information that a person can be identified from and which is about that person, such as a name, address, account number, email address, location, CV or medical information. We uphold the privacy rights that everyone has when it comes to how their personal data is handled.

We have a comprehensive data protection policy that every colleague in the Marshalls Group is expected to know and comply with. We ensure this is understood by delivering regular compulsory training. Our data protection principles detail the ways in which we manage data. Data must:

- a) be used in a way that makes it clear to data subjects what is being done with their personal data, and is fair, reasonable and compliant with Data Protection Laws;
- b) only be used in line with how we told the data subject we would use it and not for any wider, incompatible purposes;
- c) be adequate, relevant and limited just to what we need it for;
- d) be accurate and, where necessary, kept up to date;
- e) not be kept in a form which permits identification of data subjects for any longer than necessary for the purpose for which the personal data is processed; and
- f) be kept secure.

PROTECTING AND RESPECTING HUMAN RIGHTS

Marshalls has been a United Nation's Global Compact signatory for more than ten years. We have made a public commitment to uphold the ten principles which support the pillars of human rights, labour, environment and anti-corruption.

UNGC Principles

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and **Principle 2:** make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4: the elimination of all forms of forced and compulsory labour;
Principle 5: the effective abolition of child labour; and
Principle 6: the elimination of discrimination in respect of employment and occupation

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges; **Principle 8:** undertake initiatives to promote greater environmental responsibility; and **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.





The Marshalls Human Rights Policy

Find out more about UNGC by scanning this QR code:

For IOS, open your camera and hold it over the QR code. For Android, download a QR reader app to scan the code Your phone may take you to the webpage automatically, or a linked box will appear on the screen – click the link

TAKING ACTION AGAINST MODERN SLAVERY

"The Modern Slavery Act has already provided additional internal focus here at Marshalls. The organisation as a whole is engaged and employees increasingly understand the important role that they play in helping to ensure that we do not become corporate victims of criminality, and that an individual's human rights are not violated at any point within our business operations and supply chain. Importantly, our values, together with our commitment to the UNGC guiding principles of human rights, labour, environment and anti-corruption, provide the foundations for the decisions that we make day-in-day-out."

Elaine Mitchel-Hill Business and Human Rights Lead

Marshalls was among the first to publish its Modern Slavery Disclosure Statement back in May 2016. In our pledge to end modern slavery, we have continuously developed six focus areas of activity:



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.



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



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.



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.



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.



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

Spotting the signs – some examples...

- The person acts as if instructed by another
- They might appear to be scruffy in appearance and wear the same clothes every day
- They may appear to be injured in some way
- They look to be fearful or paranoid
- They exhibit anxious behaviour
- They avoid eye contact
- They appear to lack health and dental care
- They appear to be malnourished
- They rarely interact with others
- They're never left alone
- They may not have identification if asked
- They might be dropped off and collected from work on a regular basis either very early or late at night

In children...

- They're being cared for by an adult who is not their parent or guardian
- The relationship between the child and the person caring for them gives a reason for concern
- They may be missing school they're of school age, but not at school
- They may not always demonstrate outward signs of distress and may have a 'bond' with those exploiting them and have been groomed to not disclose their abuse

Modern Slavery



You can access UK Government Information on Modern Slavery by scanning this QR code:

For IOS, open your camera and hold it over the QR code. For Android, download a QR reader app to scan the code Your phone may take you to the webpage automatically, or a linked box will appear on the screen – click the link

HARASSMENT, BULLYING AND DISCRIMINATION

Our Code of Conduct makes it absolutely clear that we do not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us. We also do not tolerate behaviour or attitudes that support harassment, bullying or discrimination.

We are fully committed to creating a working environment in which everyone is respected and can flourish equally, without fear.

Harassment and Bullying

Harassment and bullying refer to any action or behaviour that any individual or group finds humiliating, intimidating, threatening, violent, hostile or discriminatory. We should all be especially sensitive to actions that may be acceptable in one culture, but not in another.

Discrimination

Discrimination means treating a person or group differently according to factors such as their age, race, religion, national or ethnic origin, colour, gender, sexual orientation, gender reassignment, marital status, disability unrelated to the task in hand, union membership or political affiliation. If you observe harassment, bullying and discrimination anywhere within our operations please let us know.

You can find details on how to report your concerns at the back of this document.



THE LIVING WAGE

Our vision is to Create Better Spaces and Futures for Everyone: Socially, Environmentally and Economically. A part of this is ensuring the people who work for us are paid a real Living Wage. A wage that means they can live better lives and have better futures.

The Living Wage is calculated according to the basic cost of living in the UK. The Living Wage is often confused with the 'National Living Wage' introduced and set by the UK government. However, the Living Wage is higher and employers choose to pay it voluntarily.

Paying a Living Wage is without a doubt good for business, good for individuals and good for society. We know that having people who feel valued and properly rewarded allows us to deliver the best for our people, customers, partners and stakeholders.

Being a Living Wage Employer is something we're proud of because we're serious about our vision and we believe in a fair day's wage for a hard day's work.

"Paying a Living Wage makes a huge difference for our people, and it sets our business apart. Our people are our differentiator, and truly showing them how valuable they are to our business through a proper and fair wage backs this up.

We work hard to ensure we're a great employer, and paying a Living Wage is a big part of this. It's our way of showing commitment to our vision of Creating Better Spaces and Futures for Everyone."

Louise Furness Marshalls Group HR Director





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The Living Wage Find out more about The Living Wage by scanning this QR code.

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DIVERSITY, INCLUSION AND SOCIAL MOBILITY

We recognise and appreciate the value that diverse backgrounds and perspectives bring to the workplace. We actively promote diversity in our hiring practices.

Marshalls maintains strict compliance with all legal requirements regarding the equal treatment of all employees in the terms and conditions of employment.



How we ensure a diverse and inclusive workplace...

We've signed the **Social Mobility Pledge** which represents our commitment to go further and commit to take these three steps:

- **Partnership:** we partner with schools and colleges to provide coaching through quality careers advice and mentoring people from a disadvantaged background or circumstances
- Access: we provide structured work experience and apprenticeship opportunities to people from disadvantaged backgrounds or circumstances
- **Recruitment:** we adopt open recruitment practices, which promote a level playing field for all people regardless of their background. We provide training and education in conscious and unconscious bias and attract candidates through a minimum of 17 different channels.



We partner with **Bright Future** and their charity partners to provide a pathway to employment for survivors of modern slavery.

We work with a non-profit organisation called **SAFERjobs** who support job seekers and agency workers in dealing with any suspected fraud, malpractice, breach of legislation, or poor experience they may encounter. We ensure that all aspects of our supply chain are transparent and that job seekers are protected from exploitation.



PROTECTING THE ENV CREATE BETTER SPACE

We care about the natural world and we recognise our responsibility to work within environmental limits. We understand the potential impacts of our operations, products and services. The very nature of our business means that our long-term success is linked to protecting and working with the environment.

We're committed to achieving the highest standards of environmental and energy / carbon performance. Constantly seeking to protect the environment, prevent pollution from our operation and to identify, understand and minimise significant environmental impacts where appropriate.

We operate to established management systems (ISO14001 for Environment and ISO50001 for Energy) to ensure that all our operations meet or exceed the requirements of legislation and applicable best practice.

The Marshalls Group is committed to the monitoring, measuring and reporting of our environmental and energy performance. We use appropriate external guidelines and third party accreditation standards wherever we can. We assess the environmental and energy aspects, impacts, risks and opportunities of our activities. Setting appropriate objectives and targets, and recognising the need to work collaboratively with our whole supply chain. We have publicly committed to set a Science Based Target Initiative approved carbon target.

We aim to be successful and profitable, but not at the expense of the environment or by exploiting individuals and communities.

Marshalls reports to the FTSE4Good Index, CDP (Carbon Disclosure Project), UN Global Compact, is a signatory of the Sustainable Concrete Forum, and a funding partner of the Supply Chain Sustainability School. We hold certification for the Carbon Trust Standard for carbon, and BES6001 for Responsible Sourcing of Construction Products.

We expect all our suppliers, sub-contractors, consultants and partners to identify and implement actions they can take to help us achieve our environmental targets.

IRONMENT TO S AND FUTURES

The Marshalls Group will:

- Determine, understand and implement relevant environmental and energy legislation to fulfil our legal compliance obligations
- Develop adaptation and mitigation strategies against internal and external factors which could have adverse impacts on the environment or the Group such as resilience strategies for climate change and fossil fuel depletion
- Set Group wide objectives and targets appropriate to the nature and scale of our activities
- Maintain and continually improve our management systems, improving awareness and training in relation to environmental protection and performance
- Continually improve environmental performance by monitoring and measuring improvement initiatives, particularly in relation to water resources through recycling, capture and discharge
- Protect and enhance the natural environment both within our landholdings and the wider corridor where possible
- Recognise the need for sympathetic restoration and after-use of quarries and other operational sites.
 And consider the character of the local environment and the concerns of the local community and other stakeholders when planning such matters
- Consider the environmental impacts associated with our products throughout their life cycle by efficient resource use
- Consider, engage and communicate with all interested parties

PROTECTING THE ENVIRONMENT TO CREATE BETTER SPACES AND Weverwested **FUTURES** morethan £750Kir energy efficient Highting

We've reduced manufactured the need for plastic packaging for our own products by 13.5%

OurGarbon

Project score is B. Disclosure

Wellerererained our Garbon Trust Standard since

reduction of 85% 2009 With a

in our carbon footbrint

50 51 Marshalls Code of Conduct v3

Energy

Carbon

Biodiversity

Our FTSE4Good ESG score is 3.5 out of 5. This is ahead of the UK average of 3, and

more than one point ahead of our industry

at 2.4



RAISING A CONCERN

We need our colleagues, suppliers, partners and stakeholders to work with us to ensure compliance with the Marshalls Code of Conduct and supporting policies at all times. Where something is in direct conflict with the Marshalls Code of Conduct, we encourage you to let us know.

Do not wait to speak up! If it feels like something is wrong, it probably is. Speaking up as early as possible allows us to deal with the concerns quickly and efficiently, before there is an increased risk to health and safety, a violation of the law, or irreversible damage to our brand and reputation.

Coming forward about something that concerns you is always the right thing to do. We will not support any retaliation or discrimination of any kind against someone who raises a concern in good faith. Any concerns raised will always be followed up discreetly and will be treated confidentially and shared on a need-to-know basis only. We want to create the kind of environment where people feel comfortable telling us when something isn't quite right.

You can report your concerns through our trusted partner, Safecall on 08009 151 571 or visit: www.safecall.co.uk/report

Or you can report your concerns directly to:

Elaine Mitchel-Hill Business and Human Rights Lead elaine.mitchel-hill@marshalls.co.uk

Louise Furness Marshalls Group HR Director Iouise.furness@marshalls.co.uk

Cathy Baxandall Group Company Secretary and General Counsel cathy.baxandall@marshalls.co.uk

Ask yourself in everything, does this feel right in line with Marshalls Code of Conduct?

If the answer is no, please tell us.

