

End Modern Slavery Report

2019



Marshalls

Creating Better Spaces



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The Unavoidable Truth

Martyn Coffey, CEO, Marshalls plc

“...the unavoidable truth is that the harder we all look at our supply chains the more challenges, issues and instances of slavery and human trafficking we will all find.”

I see our entire global supply chain as an extension of our workforce and our community.

There's nowhere to hide in that exceptionally clear statement; there's no ambiguity. I feel it's worth stating simply and unequivocally because I know that this sets expectations across our business operations and our supply chains. I believe that the clarity of this simple statement adds even more heat to the already driven and innovative modern slavery agenda within our organisation.

It should also serve to raise the bar within the construction sector at large; the quality of modern slavery statement should be high, the engagement of organisation should be thorough, the commitments should be stretching. These things are a given. What will make the difference is the action that we all take in seeking and finding the things that we are actually afraid that we will all find.

Having accepted all of this and taken meaningful action, the unavoidable truth is that the harder we all look at our supply chains the more challenges, issues and instances of slavery and human trafficking we will find.

The harder we look the more we will see that formal supply chains are entangled with informal supply chains. The harder we look the more we will find, the more we find the more we will understand that we must collaborate with a wider range of actors to work to find lasting solutions. For the private sector the challenge is that this is not a competitive space but a collaborative one.

I am strengthened by knowing that international modern slavery legislation and standards are now moving apace which is helping break down the barriers to achieving lasting solutions. Businesses are being held to account and in this space have the opportunity to be agents for change in a plethora of ways.

I've seen that supporting, protecting and promoting human rights, working hard to ensure fair labour practices and working to implement and uphold international modern slavery standards can make a substantial positive impact. A positive impact for workers in developing countries, a positive impact on the vulnerable individuals who are trafficked and exploited, a positive impact upon our communities, and a positive impact upon businesses. I acknowledge that working to deliver supply chain transparency is a difficult business because of the scale and complexities. But, in order to achieve the Global Goals¹ and to eliminate modern slavery, it is paramount for businesses to promote decent work and respect for workers' rights in their supply chains.

¹ <https://www.globalgoals.org/>

The Reality of Forced Labour, Trafficking & Modern Slavery

Definition of Forced Labour

According to the ILO Forced Labour Convention, 1930 (No. 29) , forced or compulsory labour is:

"all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."

The Forced Labour Protocol (Article 1(3)) explicitly reaffirms this definition.

This definition consists of three elements:

1. Work or service refers to all types of work occurring in any activity, industry or sector including in the informal economy.
2. Menace of any penalty refers to a wide range of penalties used to compel someone to work.
3. Involuntariness: The terms "offered voluntarily" refer to the free and informed consent of a worker to take a job and his or her freedom to leave at any time. This is not the case for example when an employer or recruiter makes false promises so that a worker take a job he or she would not otherwise have accepted.



Chris Harrop OBE, Group Marketing and Sustainability Director, Marshalls plc

Let's be clear forced labour can be imposed on adults and children by State authorities, by private enterprises and by individuals. It takes place in all types of economic activity such as construction, agriculture, manufacturing, sexual exploitation, forced begging and domestic service for example, and in every country around the world.

It's different from sub-standard or exploitative working conditions – which are labour abuses in their own right. There are a number of indicators that can be used to help identify when a situation amounts to forced labour; restrictions on workers' freedom of movement, withholding of wages or identity documents, physical or sexual violence, threats and intimidation or fraudulent debt from which workers cannot escape.

Forced labour is the most common element of modern slavery. It's the most extreme form of people exploitation. As well as being a serious violation of fundamental human rights and labour rights, the exaction of forced labour is a criminal offence.

Using a new and improved statistical methodology, the ILO estimates that 20.9 million people are victims of forced labour globally, trapped in jobs into which they were coerced or deceived and which they cannot leave. This figure means that around three out of every 1,000 persons worldwide are in forced labour at any given point in time.*

Although many people still associate forced labour and slavery with physical violence, the ways used to force people to work are often more insidious and ingrained.

Forced labour often affects the most vulnerable and excluded groups, for example commonly discriminated Dalits in India. Women and girls are more at risk than boys and men, and children make up a quarter of people in forced labour. Migrant workers are targeted because they often don't speak the language, have few friends, have limited rights and depend on their employers. Forced labour happens in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption and an economy dependent on cheap labour.

Let's also be clear that forced labour is not just an issue overseas, it happens here in the UK. The excellent work of the Gangmasters Labour Abuse Authority (GLAA), especially in the form of its Construction Protocol, is a reminder for all of us that forced labour is an issue for the construction sector. It's good to note from recent GLAA reports that intelligence from the sector has increased significantly as a result of Construction Protocol, which now has over 100 construction company members. It's also good to remember that Marshalls was one of the first to engage back in 2017. As a result of this increased intelligence the number of investigations and prosecutions has also increased.

Construction is now the 4th most reported sector in the UK – which reflects the increased intelligence and also prevalence. I take this as a positive that we're beginning to come together as a sector to make it clear that forced labour won't be tolerated. As Martyn's already alluded to, the harder we look the more we'll find.

* Source: <https://www.ilo.org/global/topics/forced-labour/policy-areas/statistics/lang-en/index.htm>



Unintended Consequences of Modern Slavery Legislation?

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

I find myself wondering more often of late what governments would do if all companies falling under international modern slavery legislation stepped up to the plate right now and delivered fast; let's say arbitrarily by the end of this year. By that I mean fully engaging; actively seeking out instances of modern slavery and human trafficking, walking the supply chain; imbibing the conditions, the sounds, what's said, what tone is used and by whom, what's left unsaid, the smells, the air quality, the environment, the non-verbal signs, the vibe, picking up on those things that only spending time there can tell you – those things which don't translate into an audit sheet or a report. Those things which are often overlooked or misinterpreted by those with an untrained eye, or left out by those with no stomach or imagination for what then must be done if they report it.

What if all companies commissioned undercover human rights observations of their own supply chains done by sharp minded and smart individuals? The kind that do not take any nonsense. What if all companies worked with top flight human rights actors and invited them to go into that supply chain, and not only there but encouraged and made it financially possible for them to go into the wider community to better understand the impact of their operations and that of their sector? What if sectors absolutely genuinely collaborated and left any desire to compete and show off the size of their widgets at the door? What if all companies overcame their fear and anxiety at finding something they'd rather not know about and just went ahead and did it anyway? Because that was the right thing to do. Because that was the correct human response. And because it made good business sense.

I appreciate that this might just be what goes on in my head, but faced with what feels to me overall snail's pace progress it's not only a momentary relief but a necessity for me to play the 'what if' game.

Based on my own experience, and from talking to the most highly driven and active among my peers, the barriers we're facing right now as we keenly work to know our global supply chains inside and out boil down to some significant issues; like the lack of implementation of the rule of law, corruption in various shapes and sizes, the proliferation of transnational organised crime and the enmeshing of legitimate supply chains with opaque illegitimate ones. As an individual who is fairly comfortable with an uncomfortable level of risk, making a dent in these issues is probably a step too far, at least alone it is. It will take the assembling of an extraordinarily large and committed A-team.

And so, I wondered if maybe an unintended consequence of the MSA will be an increasing push back to governments? A call for government-to-government engagement on these issues? An increased focus in this modern slavery space on the state's duty to protect, respect and remedy? A clear message from the private sector that governments' own procurement is also accountable and part of the problem, or solution?

I sense that if all businesses delivered on International Modern Slavery and Human Trafficking legislation by the end of the year that governments would be overwhelmed with the level of work that they must do to assist the private sector in driving the change necessary. I'm fast learning that this is about more than keeping a clean supply chain. It's about cleaning up the context in which business is done.

Impact

During the past 12 months Marshalls has:

- Ensured that 100% of its employees are exposed to modern slavery awareness raising, how to spot the signs, how to report and know what Marshalls response is to Modern Slavery.
- Increased the number of modern slavery ambassadors within the business from 5 to 7.
- Ensured that 350 employees directly involved in supply and demand chain management receive ongoing updates and notification regarding business & human rights, and specifically modern slavery.
- Continued to roll out supplier communication and verification platform to ensure that 95% of suppliers have confirmed acceptance of Marshalls Supplier Code of Conduct, including Modern Slavery.
- Continued to develop supplier education partnership opportunities with 50% of those identified as high risk through our modern slavery risk mapping activity.
- Engaged in proactive modern slavery education, programmed with those suppliers who have raised issues or concerns.
- Provided 9 pieces of direct intelligence to local law enforcement in the UK as a result of approved installer register modern slavery training and the training of its logistics personnel.
- Played an active role in the development of a cross-sectoral India programme within the ILO IPEC Child Labour Platform.
- Actively engaged in the GLAA Construction Protocol Platform.
- Launched Marshalls Power of Logistics initiative and made this available to other organisations who wish to use it.
- Published modern slavery risk mapping for 100% of our business operations and supply chain.
- Undertaken supply chain mapping for 60% of the highest risk supply chains, by volume.
- Actioned an external ethical auditing and modern slavery risk mapping programme which covers 30% of the supply chain identified as high risk.
- Have in place a process of remediation and support for 50% of supply chains identified as high risk by volume of product.
- Actively engaged with UK and overseas governments to address root causes of modern slavery.



Modern Slavery Implementation Timeline

May 2016
1st MSA Statement published. Connects with local Crime Commissioner & local law enforcement.

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.

August 2016
Joined UNGC UK Modern Slavery Working Group.

July 2016
Development of internal protocols regarding MS in UK business operations. Internal online MS training launched.

June 2016
Launch of MS internal awareness campaign.

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.

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.

April 2017
Development of supply chain modern slavery risk mapping process. M-Way Employees Code of Conduct published internally.

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.

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.

August 2017
Filming with Supply Chain School to share ethical & MS journey.

July 2017
Publication of Marshalls first MS Risk Mapping Country Profiling. Launch of Ethical Risk Index.

June 2017
Publication of Marshalls first End Modern Slavery Report.

2019/20 KPIs

	<p>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.</p>	<ul style="list-style-type: none"> 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. Actively engage in the Bright Future programme to offer work placements to survivors of modern slavery. Delivery of multi-stakeholder pilot programme in Vietnam together with the UN IOM, around Marshalls supply chains and the wider community. Continue to engage with ILO IPEC and through the Child Labour Platform further Marshalls' part in a far reaching cross sectoral multi stakeholder programme. Actively seek the expansion of Marshalls Power of Logistics Programme by engaging other businesses with significant logistics operations.
	<p>Implement appropriate remediation and support programmes for victims of modern slavery identified within the organisation's operations and supply chains.</p>	<ul style="list-style-type: none"> Have in place a solid and appropriate process of remediation and support for 65% of the supply chain identified as high risk by volume of product; from India and Vietnam. Continue to develop and implement a forced labour/modern slavery identification and remediation processes in Marshalls' UK business operations, and in supply chains in India, Vietnam & Europe.
	<p>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.</p>	<ul style="list-style-type: none"> Continue to publish annually modern slavery country risk mapping profiles for 100% of sourcing countries. Enhance internal processes and procedures, for 50% 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.

	<p>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.</p>	<ul style="list-style-type: none"> Number of reported instances of modern slavery in our business operations and supply chains by country/supply chain. Number of pieces of intelligence shared with law enforcement, GLAA, and our anti-slavery partners and resulting instances of modern slavery. Undertake audit against CRBP framework and analyse in relation to modern slavery.
	<p>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.</p>	<ul style="list-style-type: none"> Continue to implement Marshalls supplier engagement programme: ProActis Supplier Management Platform, including BRE 6002 assessment process. Continue to develop supplier education partnerships with 100% of those identified as high risk through our modern slavery risk mapping processes and supplier engagement programme. Engage in proactive modern slavery education programmes with those suppliers who have identified issues or expressed concerns.
	<p>Maintain consistent delivery of a modern slavery & human trafficking awareness raising programme with key stakeholders.</p>	<ul style="list-style-type: none"> Ensure that 100% of employees in UK – including Marshalls CPM and Marshalls Edenhall - business operations are exposed to modern slavery training; how to spot the signs, how to report swiftly & safely, and Marshalls response to modern slavery. Commit Marshalls Belgian operation to the Dutch and Flemish TruStone responsible sourcing initiative and report on this moving forward beyond 2019. Continue to ensure that 100% of all inductions for temporary labour include modern slavery training. Commit to the SaferJobs initiative. Review Marshalls temporary labour provider and commit to an organisation who is fully engaged with the Modern Slavery Act and can demonstrate robust processes and procedures. Increase the number of tactically placed Modern Slavery Ambassadors within business operations by 65% and support all Modern Slavery Ambassadors in their specific programme of activity. Ensure that the 350 key individuals involved in supply and demand chain management continue to receive additional training, human rights updates and notifications regarding modern slavery and human trafficking.



Modern Slavery Ambassadors

Dave Jessop

Marshall's Register Manager
Modern Slavery Ambassador: Installers



- ✓ Raising and maintaining awareness of modern slavery with Marshall's UK-wide approved installers register.
- ✓ Liaising with Marshall's anti-slavery partner/local law enforcement regarding intelligence provided.

Karen Preiss

Category Manager Indirect Purchases
Modern Slavery Ambassador: Procurement



- ✓ Working with Marshall's temporary labour provider on modern slavery training programme.
- ✓ Keeping the procurement team updated regarding developments in terms of modern slavery and sustainable procurement.

Mike Plaster

Commercial Product Manager
Modern Slavery Ambassador: Commercial



- ✓ Raising awareness of modern slavery with specifiers, contractors, architects and others in the UK construction sector.

Kirsty Simpson

Group Human Resources Advisor
Modern Slavery Ambassador: Human Resources



- ✓ Keeping HR colleagues informed and updated on modern slavery trends, data and issues.
- ✓ Facilitating Marshall's engagement in Bright Future job placement initiative for victims of modern slavery.

Paul Battison

Head of Logistics
Modern Slavery Ambassador: Logistics



- ✓ Facilitating the training of the logistics team within Marshall's UK operations.
- ✓ Facilitating the delivery of the 'Power of Logistics' modern slavery programme.

James Eastwood

Marshall's, Driver



- ✓ Raising awareness of modern slavery issues with colleagues at the sharp end.
- ✓ Keeping logistics colleagues informed and updated on Marshall's Power of Logistics initiative.
- ✓ Practical delivery of Power of Logistics initiative.

Ryan Darcy

Marshall's, Driver



- ✓ Raising awareness of modern slavery issues with colleagues at the sharp end.
- ✓ Keeping logistics colleagues informed and updated on Marshall's Power of Logistics initiative.
- ✓ Practical delivery of Power of Logistics initiative.

Focus on India



Cross Sectoral Collaboration

Marshalls remains an active member of IPEC ILO Child Labour Platform and as such continues its efforts to eradicate child labour in the sandstone sector in India. The CLP's aims are to identify the obstacles to the implementation of the ILO Conventions in supply chains and surrounding communities, identify practical ways of overcoming these obstacles, and catalyse collective action. Marshalls is currently engaged in IPEC CLP multi-stakeholder programme in India, together with other big global brands from different sectors who source heavily from the country. The cross-sectoral work in India that we have been engaged in through our membership of the International Labour Organisation Child Labour Platform is set to continue apace in 2019.

Towards the end of 2018 the undercover human rights observation research commissioned by Marshalls and undertaken by an independent third party in India was completed. The findings of this significant piece of research are helping to guide and direct our work in India, both within our own supply chain and the sector as a whole.

"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.





Focus on Vietnam

Focus on Vietnam – Multi-Stakeholder Programme

During May 2019 the UN International Organisation for Migration, Mission in Vietnam, began a first phase three month project in Vietnam. The project seeks to understand the modern slavery and human trafficking risk in the natural stone sector. The focus is upon assessing modern slavery and human trafficking risks in Marshalls' Vietnam supply chain and also within the wider sector. The assessment findings will inform the design and implementation of an action programme to prevent and eliminate modern slavery and human trafficking, contributing to enhancing Marshalls' global commitment to address the issues.

"Moving forward our aim is to work with multiple stakeholders in Vietnam; including the British Embassy, Vietnamese Chamber of Commerce and Industry, Natural Stone Association, IOM, ILO and others to promote and support international standards."

Chris Harrop OBE, Group Marketing and Sustainability Director

"IOM values the partnership with Marshalls and is ready to continue the joint efforts with all local and international stakeholders towards a shared goal of better protecting labour and human rights in business operations and supply chains. IOM believes that supply chain transparency and socially responsible labour practices will become increasingly important factors for the sustainable growth of export-oriented industries in Vietnam."

Mark Brown, Head of Sub-Office, IOM Ho Chi Minh City



Focus on the UK

Power of Logistics - Marshall's Front Line Staff Working to End Modern Slavery

Marshall's has engaged the power of its nationwide logistics operation to help eradicate modern slavery. The entire logistics management team has been trained by anti-slavery partner, Hope for Justice, and a bespoke training film, in-house training programme and supporting material has been cascaded throughout logistics operations. The initiative was officially launched in March 2019 with the backing of West Yorkshire PCC and the Association of Police and Crime Commissioners (APCC) lead on Modern Slavery, Mark Burns-Williamson, and with the support of the Gangmasters Labour Abuse Authority (GLAA).

Mark Burns-Williamson said, "Businesses and their supply chains have a key role in putting an end to modern slavery. They are invaluable partners and well placed to help in the detection and prevention of these horrific crimes and abuses. This is a great commitment by Marshall's plc. A West Yorkshire-based organisation, the UK's leading hard landscaping and construction materials company, and with a national and global reach. Marshall's stance on this is already making a real difference. I hope and believe this is something that other businesses will definitely look to replicate and get involved in. Raising awareness and providing training among frontline workers is key in helping eradicate such abhorrent practices."

Elaine Mitchel-Hill, Business & Human Rights Lead, and responsible for Marshall's response to the implementation of the Modern Slavery Act said, "Colleagues throughout our logistics operations recognise their unique role in helping to eradicate modern slavery. They absolutely know what's right and what's not; they are already well equipped to make a moral judgement. This bespoke training helps them to better understand the signs of modern slavery. They're then empowered to make a call and report what they've seen. And that's all we're asking them to do. Simply understand the signs, to spot and then report; that's more than enough. Job Done."

Mitchel-Hill continued, "We already know that this highly visible front line logistics initiative has incredible power in term of empowering and equipping colleagues who are out delivering to construction site, yards and other locations not always visible to law enforcers. In one instance within 24 hours of training, dashcam footage was provided to local law enforcement when the driver was able to recognise that what he was witnessing was most likely a serious indication of modern slavery."

Samantha Ireland, Head of Business Change at the GLAA who has developed and facilitates the GLAA Construction Protocol Network commented, "Information and intelligence from the construction sector is key. Since developing the Construction Protocol and engaging deeply with the construction sector we've seen a significant increase in reporting instances of modern slavery. This very practical and powerful initiative from Marshalls is exactly what is required."

Chris Harrop OBE, Group Marketing and Sustainability Director, added "Our preventative activity on-the-ground in the UK is every bit as important as the work that we do across the globe in our supply chains. The extent of modern slavery in the UK shows little sign of stopping or slowing. It was reported just recently that 1 in 200 people globally are in slavery; more than 40 million people worldwide and more than at any other time in history*. It's vital that organisations really scrutinise their business operations to find areas that can be leveraged in the fight against modern slavery. This frontline initiative is very simple and very effective."

Nigel Basey, Head of Logistics said, "Throughout the coming weeks Marshalls' entire fleet of vehicles the length and breadth of the country will continue to have the National Modern Slavery Helpline Number (08000 121 700) clearly visible for all to see. All of our logistics team are extremely engaged, well informed and keen to do what they can to spot and report."

Mitchel-Hill concluded, "We're already in discussions with a client and supplier organisation both of whom have large logistics operations in the UK and who are keen to adopt this Power of Logistics approach. We have committed to making all of our Power of Logistics collateral and learnings available to them, and any other companies that are interested, and to supporting them in this endeavour because this space is about eradicating modern slavery and we'll do that only through true collaboration; this is absolutely not a competitive space."



Clockwise from top left:
Mark Burns-Williamson - West Yorkshire Police, Gary Booth - Hope for Justice, Samantha Ireland - Head of Business Change at GLAA

Signs of Modern Slavery

Physical Appearance

Victims may appear: malnourished & starved; neglected and scruffy; unclean with poor hygiene; acutely tired & exhausted; drugged or drunk; have incorrect clothing or equipment for the job

Restricted Freedom

Victims may appear: unable to come and go freely; be reluctant to leave their situation; be unable to find or show identity documents such as a passport or bank account details; be in debt to or dependent on someone else; be unwilling to handle money; to be in places where doors are locked on the outside.

Psychological Trauma

Victims may appear: fearful or scared; anxious or stressed; angry or agitated; withdrawn; traumatised; confused; unable to make themselves understood.

Reluctant to Seek Help

Victims may appear: reluctant to talk to you; reluctant to being helped by you or others; reluctant to leave their situation; fearful of you or the authorities; fearful of reprisal from someone else; unable to prove their legal status to be in the UK.

Isolation

Victims may appear: withdrawn; unable to communicate effectively; unable to understand you; unable to speak English; have someone else speak on their behalf.

Unusual Travel Times

Victims may appear: to travel at unusual times; travel very early in the morning or late at night; have transportation to and from work provided for them; have to pay for the transport.

Poor Living Conditions

Victims may appear: to be living at a place of work; to be living in an overcrowded house; to be living in a dilapidated caravan or outbuilding; living in a place with blacked-out windows; have no heating or running water; live somewhere that is clearly not fit to live in.

End Modern Slavery

Marshalls
Creating Better Spaces

You know what's right and what's not; you make the call...

Remember, in doing the right thing never ever step in and put yourself or the victim in further danger.

Simply make a call, that's more than enough. Job done.

Ways to Report Modern Slavery Seeking Assistance	
If you see someone in danger	
Call the Police	999
If you want to report an instance of modern slavery	
Call the National Modern Slavery Helpline	08000 121 700 or report online @ www.modernslaveryhelpline.org/report
Call the Gangmasters Labour Abuse Authority	0800 432 0804
If you have seen something which makes you uncomfortable but you are unsure	
Call Hope for Justice	0300 008 8000
Speak to one of Marshalls Modern Slavery Ambassadors	01422 312 000
Speak to Marshalls Business & Human Rights Lead	
If you have seen something which makes you uncomfortable or is a red-flag for you at any time	
Speak to Marshalls Business & Human Rights Lead	

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End Modern Slavery

You know what's right and what's not; you make the call...

Remember, in doing the right thing never ever step in and put yourself or the victim in further danger.

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How to spot the signs of Modern Slavery, and ways to report and seek assistance.

Information and wallet-sized cards held by all Marshalls employees

* Source: <https://www.theguardian.com/news/2019/feb/25/modern-slavery-trafficking-persons-one-in-200>

Awareness Raising Roadshows

Educational events across eight of our UK Sites

Since our last End Modern Slavery Report, anti-slavery organisation Hope for Justice has undertaken a series of awareness raising and educational roadshows at eight of our UK sites across the country. The aim of this activity was to keep modern slavery front-of-mind, to reinforce the signs of modern slavery; how to spot them and how to report safely, and also to give employees the opportunity to talk with anti-slavery experts and to ask questions directly. The roadshows were extremely well received and built upon our ongoing internal training. It also followed the company-wide issue of wallet-sized information cards which support our team regarding modern slavery, whether they have a question or feel they have encountered something which doesn't feel right to them. The information cards, together with training, empower them to make the choice that they feel best suits the situation.



Partnerships & Collaborations



The GLAA Construction Protocol

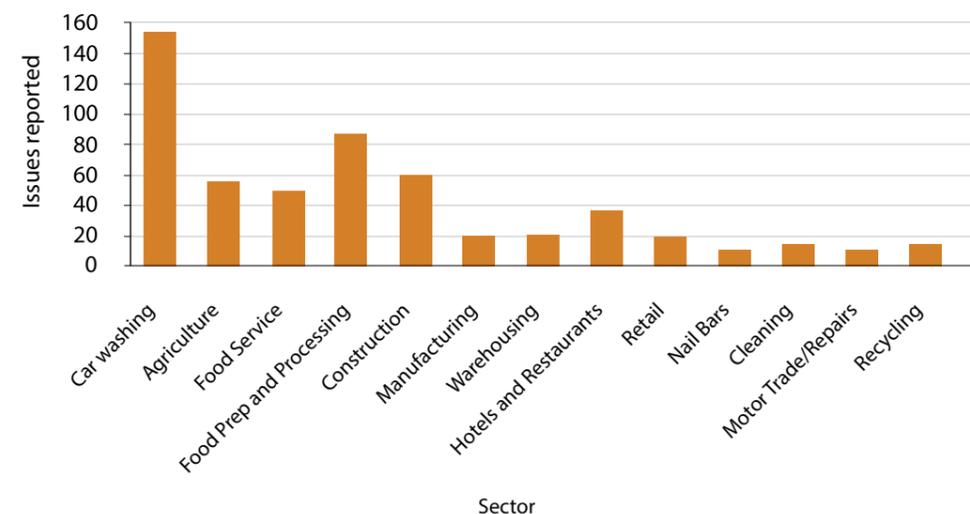
Over the last 12 months Marshalls has remained actively committed to the Gangmaster Labour Abuse Authority Construction Protocol. Since the GLAAs powers were extended in 2017 the number of referrals had doubled. The organisation has initiated 17 investigations and supported 8 others. The GLAA Construction Protocol began in 2017 with just six initial members, of which one was Marshalls, and now has over 100 construction sector members. Construction is now the 4th most reported sector to the GLAA.



UK Government Engagement

- ✓ Active participation in the consultation process regarding the review of the Modern Slavery Act.
- ✓ On-going support and participation in the All Party Parliamentary Group on Sport & Modern Slavery.
- ✓ Engagement with the Commonwealth Parliamentary Association education and information gathering regarding modern slavery legislation.
- ✓ Participation in the Home Office consultations with the construction sector.

Referrals received by sector April-June 2019



Partnerships & Collaborations



UNGC UK Modern Slavery Working Group

Marshalls was an original member of this UNGC UK Modern Slavery Working Group which started in 2016 and continues to actively engage; sharing learnings and challenges, bringing insights from other related activities to the table for dissection and feedback.



“Marshalls’ continued engagement is extremely important to this group. The openness of the sharing, quality of input, frankness of feedback and positive response to suggestions all help to drive group dynamics and to push for overall progress.”

Steve Kenzie, Global Compact UK Network, Secretariat

Effective Approaches to Ending the Worst Forms of Child Labour in Fragile Contexts (EAPEC): Private Sector Strategic Advisory Panel

Funded through the UK Department for International Development (DfID), the Effective Approaches to Ending the Worst Forms of Child Labour in Fragile Contexts (EAPEC) programme will focus upon accelerating the change required to ensure that the rights of children to be protected from the worst forms of child labour in fragile contexts are upheld. The EAPEC programme will be implemented by a Consortium of child-focused international NGOs, War Child and World Vision, the United Nations Global Compact (UNGC), the world’s largest sustainability platform for private sector organisations via the Global Compact UK Network, specialist organisation FiftyEight addressing child labour in supply chains in conjunction with

the private sector, the Thomson Reuters Foundation media organisation with legal and digital expertise, and research partner Columbia University through the Care and Protection of Children Network.

Elaine Mitchel-Hill, Marshalls Business and Human Rights Lead, will chair the EAPEC Private Sector Strategic Advisory Panel which exists to act as a conduit between the private sector and the EAPEC Consortium; channelling private sector perspectives, experience, insights and knowledge, and opening up grass roots opportunities and private sector networks, with the purpose of enhancing successful programme delivery.

Social Responsibility Alliance; Slavery & Trafficking Risk Template

Marshalls has been engaged with the Social Responsibility Alliance since 2018; Business & Human Rights Lead, Elaine Mitchel-Hill, sits on both the STRT Development Committee and the Membership Committee.

The Social Responsibility Alliance (SRA) is an initiative focused on providing companies with the open-source tools, resources, and support they need to build socially responsible supply chains

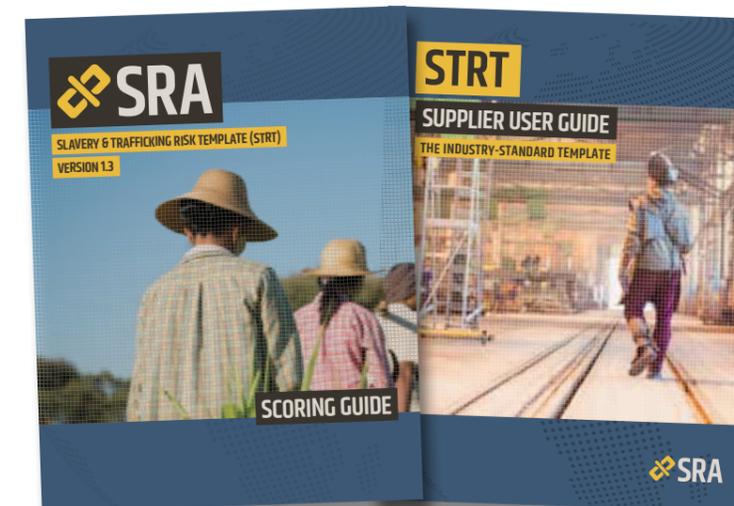
through the collection of responsible sourcing data. Founded in 2017, the initiative seeks to more broadly facilitate the collection of human and labour rights data to spark change in global supply chains and improve the lives of those impacted by human rights violations. The global development committee convenes regularly to ensure that the STRT keeps stride with new learning and regulatory developments.

“Marshalls resonated strongly with SRA’s mission to provide companies throughout the supply chain with the data tools needed to build socially responsible supply chains in response to regulatory requirements and stakeholder expectations. By utilising and promoting the use of the Slavery & Trafficking Risk Template we aim to facilitate widespread adoption and the collection of human and labour rights data. The STRT is open source - free to use, supported by user guides, work sheets, case studies and scoring guides. It takes away any possible barriers to driving for supply chain transparency.”

Elaine Mitchel-Hill

“Data is the lynchpin of modern slavery due diligence. The STRT gives businesses confidence that the data underpinning their modern slavery programmes is robust and reliable. The Committee has benefited enormously from Marshalls’ leadership on modern slavery.”

Sarah Carpenter, Former Co-Chair - STRT Development Committee





BRE

BRE Ethical Labour Standard Verification 6002

Marshalls achieved BRE ELS 6002 independent verification for the fourth year running in early 2019. This ethical labour sourcing standard was developed by BRE in response to the Modern Slavery Act to assist organisations seeking continuous improvement in their human rights due diligence and ethical approaches to supply chain management. The assessment framework comprises criteria for evaluating the maturity of organisational performance against twelve issues including; management systems, procurement practices, supply chain management and reporting.



ETI



Marshalls ETI Strategic Objectives 2018 - 2020

- 1/ Develop and embed internal processes and procedures 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.
- 2/ Collaborate with suppliers, agents, ILO, IPEC, anti-slavery partners, the Anti-Slavery Commissioners Office, governments and other actors to identify, prevent and mitigate human rights abuses in Marshalls' own business operations and supply chains, and in the wider construction sector.
- 3/ Develop and implement a forced labour/modern slavery identification and remediation processes in Marshalls' UK business operations, and in supply chains in India, Vietnam & Europe.
- 4/ Develop and implement human rights monitoring, reviewing and reporting processes; report transparently on all efforts to respects human rights and prevent forced labour/modern slavery and utilise to inform business decision making, due diligence processes and improve conditions for workers.

Modern Slavery Risk Mapping

Marshalls has undertaken, for the third year running and will do so annually, extensive modern slavery risk mapping for all countries where it has business operations, sources goods or has supply chains. Whilst we utilise this information as part of our due diligence process for new goods, materials or services, we also put it alongside internal data and information to help us to better understand modern slavery and human trafficking risks, direct our efforts and resources most effectively, develop engagement programmes with key suppliers in high risk environments and to make plans with our anti-slavery partners regarding remediation for victims. It helps us to clearly identify areas of risk, set clear priorities and to have effective dialogues with a range of key actors regarding the wider systemic change which is necessary.

Marshalls publishes this information to be transparent about the countries from which it sources and also so that it might be easily referenced by others to help identify modern slavery & human trafficking risks.

You can find Marshalls Risk Mapping here: <https://www.marshalls.co.uk/documents/reports/modern-slavery-country-profiling-2019.pdf>

TOP 6 Countries According to the Marshalls Modern Slavery Risk Mapping & Country Profiling

1. **Egypt (Risk Score 0.53)**
2. **Vietnam (Risk Score 0.50)**
3. **India (Risk Score 0.47)**
4. **China (Risk Score 0.46)**
5. **Brazil (Risk Score for both 0.42)**
6. **Turkey (Risk Score 0.41)**

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

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.

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 what they have seen, 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.



Further Reading

Please also see:

Marshalls Modern Slavery Statement

<https://www.marshalls.co.uk/documents/policies/marshalls-modern-slavery-statement-2019.pdf>

Marshalls Modern Slavery Risk Mapping Country Analysis and Profiles

<https://www.marshalls.co.uk/documents/reports/modern-slavery-country-profiling-2019.pdf>

Marshalls UNGC Communication on Progress Report

<https://www.marshalls.co.uk/documents/reports/ungc-report-2018.pdf>

M-Way Supplier Code of Conduct

<https://www.marshalls.co.uk/documents/info%20guides/37823%20m-way%20code%20of%20conduct%20booklet.pdf>

Marshalls Human Rights Policy

<https://www.marshalls.co.uk/documents/policies/human-rights-policy.pdf>

If you wish to contact us about anything in this report please email our Business & Human Rights Lead, Elaine Mitchel-Hill at elaine.mitchel-hill@marshalls.co.uk



Marshalls

Creating Better Spaces