

# End Modern Slavery Report 2017

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**Marshalls**

*Creating Better Spaces*



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## No Place for Modern Slavery

Martyn Coffey, CEO, Marshalls plc.

We are working hard to make Marshalls business operations and supply chains worldwide as toxic as possible to the organised criminals who seek to exploit vulnerable individuals and corporations.

Our message to them is that there is simply no place for modern slavery in Marshalls' business operations and supply chains. We are engaged, well informed, well connected and unafraid to transparently report and share what we find. We're committed to knowing all that we can about where there are risks and to taking appropriate action.

We are wholly supportive of the Anti-Slavery Commissioners priority, 'to engage with the private sector to promote policies to ensure that supply chains are free from slavery and to encourage effectual transparency reporting'.

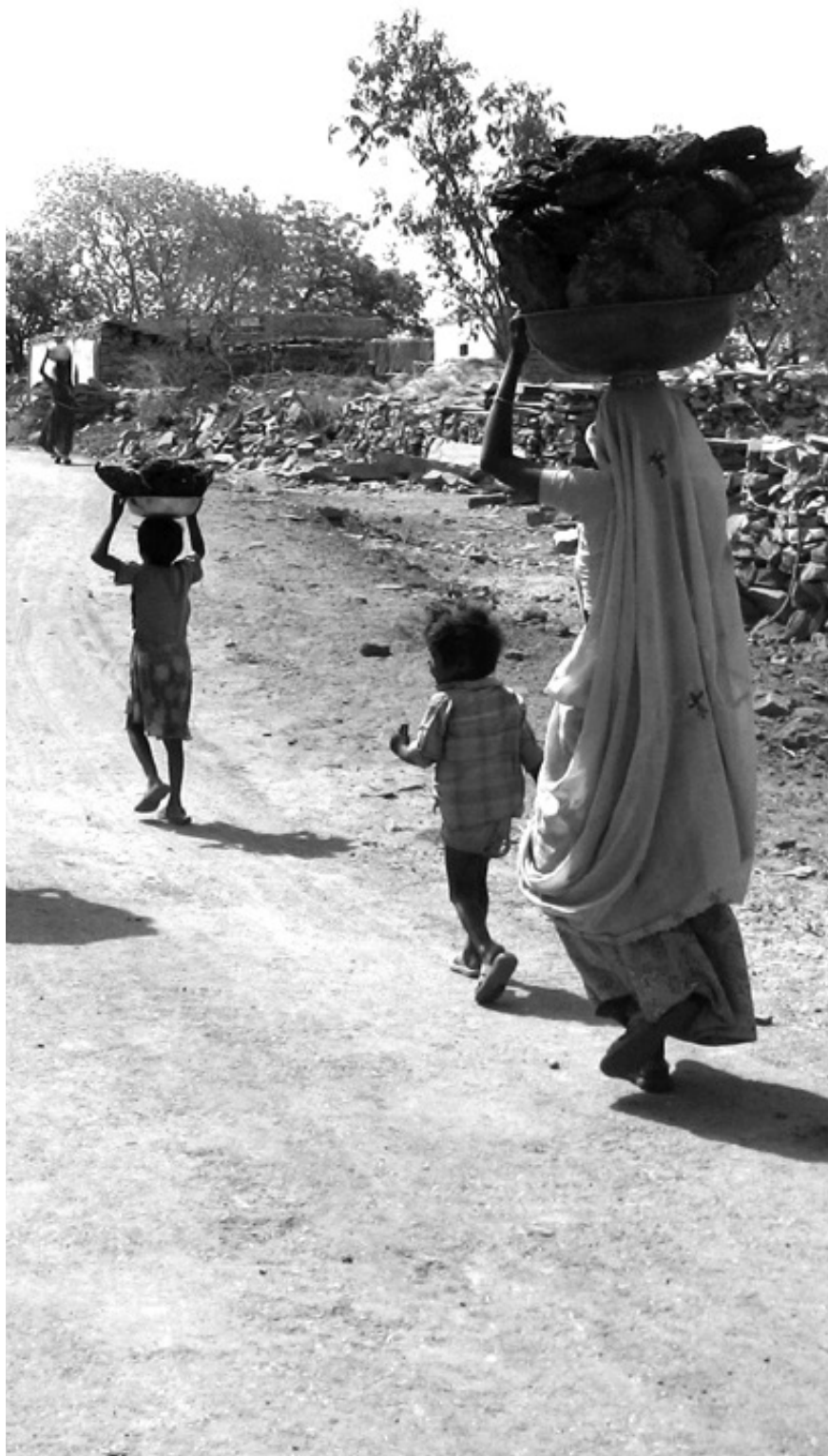
We understand that businesses have a role to play, together with law enforcement agencies and others, to drive traffickers into plain sight by using all of the avenues and leverage at our disposal, both up-stream and down-stream as well as within our own business operations.

From a business perspective human rights regulation is on an upward trajectory and the issue of slavery will, quite rightly, remain firmly in the spotlight. Those organisations still not fully engaging with the issues of modern slavery and only doing the minimum in terms of risk mitigation are not only putting human lives at risk but are also missing out on the opportunity to use ethical business and a sustainable approach to drive competitive advantage.

**The moral perspective is clear: modern slavery is simply wrong.**

Martyn Coffey, CEO, Marshalls plc.





## Much More Still To Do

Chris Harrop, Group Marketing Director,  
responsible for sustainability, Marshalls plc

It is a stark and sickening reality that organised criminals around the globe are profiting from the exploitation of human beings and that human traffickers regard people as commodities; items that can be exploited and traded for profit. It is an illicit business that transcends cultural, social, linguistic and geographical boundaries and one that knows no borders and no rules; men, women and children are used as products for sexual or labour-based exploitation.

Human trafficking, for labour and for sex, is one of the fastest-growing transnational organised crime markets.\* Human trafficking is also playing a growing role in terrorist and insurgent activities and groups.\*

Twenty-one million men, women, and children around the world are currently thought to be victims of human trafficking, which the International Labour Organization estimates generates US\$150.2 billion in profits each year. This money not only lines the pockets of the perpetrators but also finances violence, corruption, and other abuses. These crimes undermine local and national economies, destroy the environment, and jeopardize the health and wellbeing of people everywhere.

As a leader in our sector it is Marshalls' job to be as informed as we can be, to work to raise awareness within the construction sector, to know what the issues are in our own supply chains, and where, to make our business operations and supply chains as unattractive to criminals as possible, support our anti-slavery commissioners, work in collaboration with law enforcement agencies locally, nationally and internationally, work creatively with anti-slavery partners to prevent modern slavery, use everything that we have at our disposal as a business and to put the victim at the centre of our response. In short, to do whatever we can with whatever we have.

We have made good strides since the introduction of the Modern Slavery Act, but there is much more still to do.

\* Transnational Crime and the Developing World Report  
[http://www.gfintegrity.org/wp-content/uploads/2017/03/Transnational\\_Crime-final.pdf](http://www.gfintegrity.org/wp-content/uploads/2017/03/Transnational_Crime-final.pdf)





## Victim-Focused Perspective

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

It would be easy for many corporations to lose sight of the victims of modern slavery in the drive to 'mitigate risk' and to be seen to respond to the requirements of the Modern Slavery Act. Although the task is complexed, especially in overseas supply chains where often the infrastructure to support businesses in driving out modern slavery is weak or does not exist, we are clear that the victims of modern slavery are firmly at the centre of our strategy. This victim-focused perspective is one which is a natural fit for Marshalls; an organisation which puts families, children and their wellbeing at the heart of its business model.

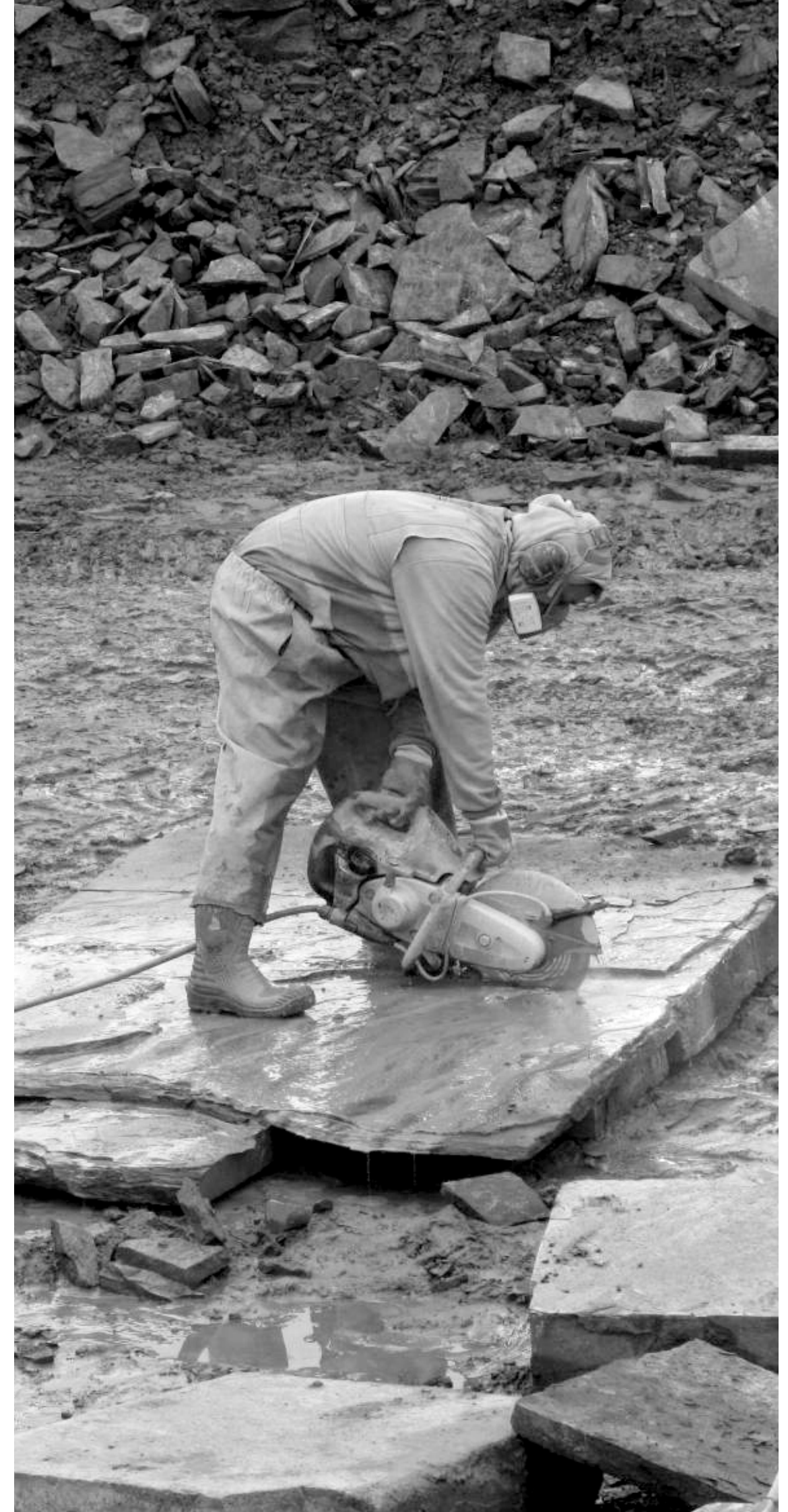
In order to deliver on our mission of 'creating better landscapes' we are empowered from a human rights perspective to seek out where we might be unintentionally doing harm and to work hard to put this right, but also to go beyond and to look at how by doing better we can create a net positive impact; so, not just mitigate and remediate, but aim to make a positive contribution. While this aspirational goal is very much work in progress it guides and shapes our approach to modern slavery demanding that we drive for creative and collaborative solutions. Different solutions call for different thinking & different action and this can be uncomfortable and create turbulence; a necessary by-product of change.

Our focus for the next twelve months will very much be on looking at our high risk supply chains overseas and working with our anti-slavery partner, procurement and human resources teams, and others, to ensure that where we find slavery we are well placed to offer support and remediation to victims which is above all appropriate for the situation, but which also seeks to be part of any longer term solution. Here in the UK, we aim to increase preventative and educational work in collaboration with the UN, Hope for Justice, law enforcement agencies, local anti-slavery networks, customers, suppliers, employees, Modern Slavery Ambassadors and partners. We will continue to draw on data from within our operations to help drill down further, alongside the country risk mapping that we have undertaken.

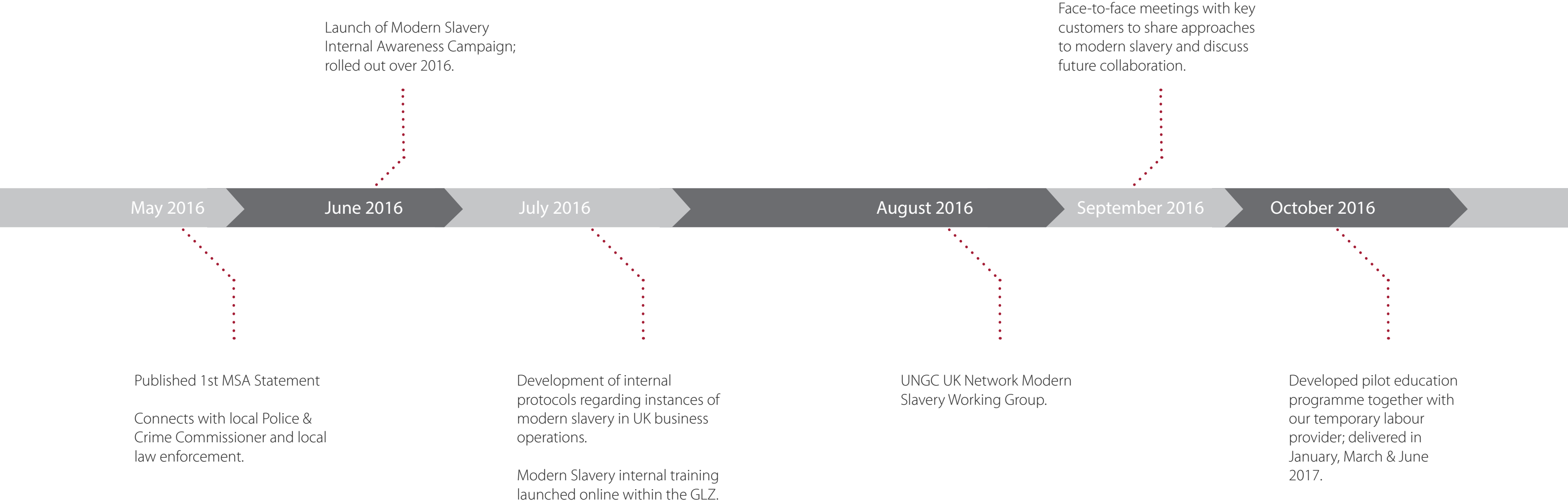
I have, without exception, experienced the full support of the business – from top to bottom – in the drive to understand and eradicate modern slavery and human trafficking. It is this engagement from my colleagues which fires my belief that Marshalls has an important contribution to make in leading the sector and together with other like-minded organisation and individuals, finding ways to herd the criminals behind this exploitation into plain sight.

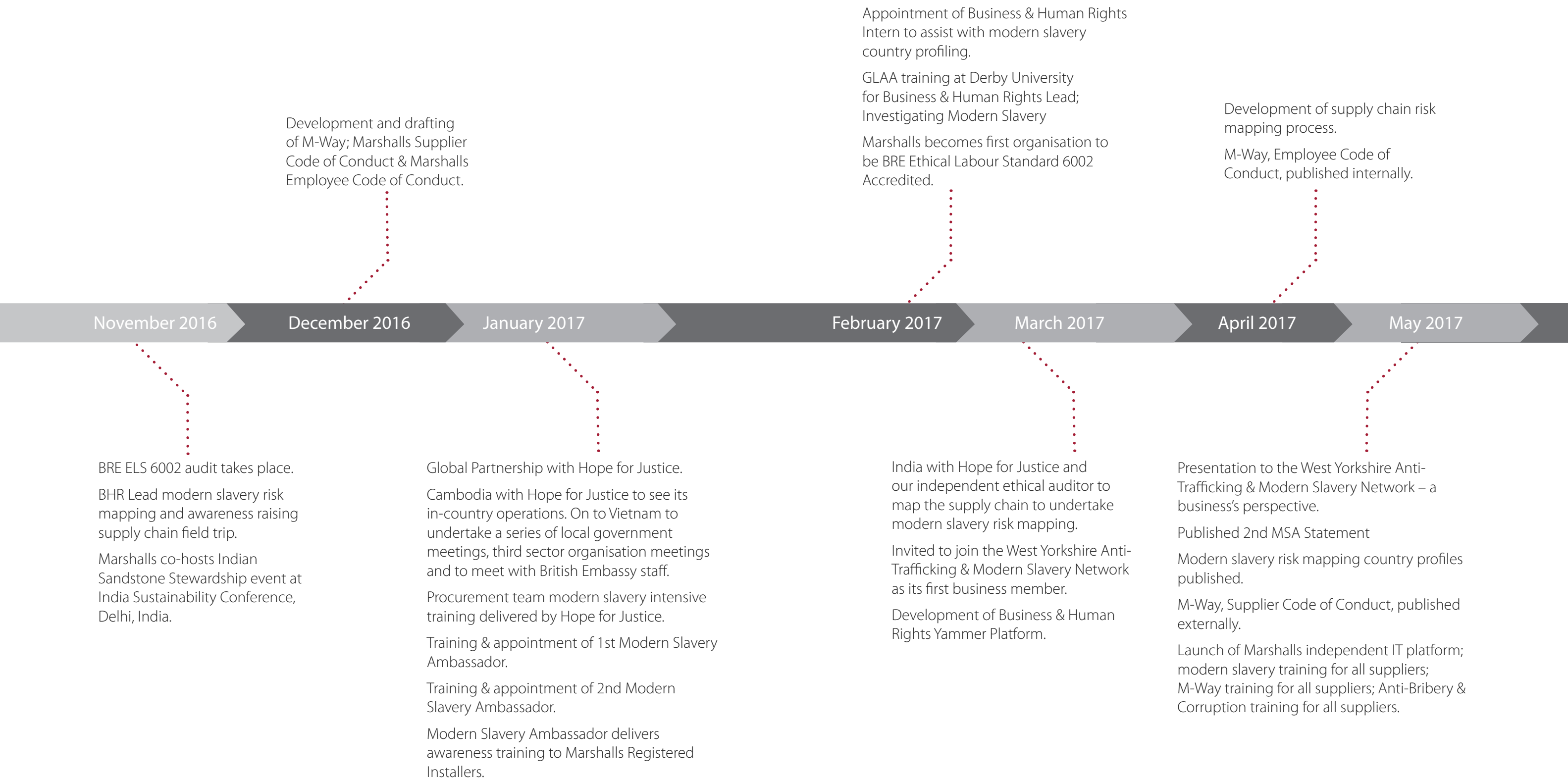


**We have two fully trained, strategically placed and highly engaged Modern Slavery Ambassadors in place. One in our procurement department and one who manages Marshall large number of registered installers across the UK. We plan to increase our number of Modern Slavery Ambassadors to five by the end of 2017.**



# Modern Slavery Implementation Timeline







**Our Modern Slavery Ambassadors have been able to provide our anti-slavery partner, Hope for Justice, with three pieces of intelligence which are under investigation.**

## Global Partnership with Anti-Slavery Organisation



In January this year Marshalls entered into a long-term partnership with Hope for Justice, an anti-trafficking and anti-slavery organisation which exists to bring an end to modern slavery by rescuing victims, restoring lives, and reforming society.<sup>1</sup>

Chris Harrop, Marshalls' Group Marketing Director, responsible for Sustainability, said, "We were delighted to announce our partnership the major focus of which is preventative activity aimed at employee and supplier education but can also offer expert remediation services if required. Whilst at this point in time we are not aware of any instances of modern slavery within our business we understand that modern slavery is rife. This partnership is helping us to deliver on the commitments we have made in our Modern Slavery Disclosure statement. The initial focus was upon the UK, Vietnam and India. This will remain the case moving forward and will be expanded to include Europe in 2017 and China in 2018."

Harrop continued, "What's special for us about Hope for Justice is that they are able to offer support and services which cover all aspects of training, prevention,

investigation and response. They are a highly effective, efficient and well connected organisation, working closely with the Anti-Slavery Commissioner, Kevin Hyland. By working with them we will be in a position to make our operations and supply chains a distinctly unattractive proposition for the organised criminals seeking to exploit both individuals and businesses."

Neil Wain, International Programme Director at Hope for Justice, and Former Assistant Chief Constable, Greater Manchester Police, commented, "As part of our own due diligence processes we scrutinize any partners seeking to work with Hope for Justice. Therefore I'm fully aware of the long-term efforts that Marshalls has made to support and uphold human rights around the globe and of the organisation's genuine commitment to tackle modern slavery throughout its operations and supply chain. Indeed, Marshalls was one of the first organisations in the UK to publish its Modern Slavery Statement in May 2016 and as a result was identified as a 'best performer'<sup>2</sup>, an early indication for us that it is absolutely committed to its work in

**“Part of our mission at Hope for Justice is to bring an end to modern slavery by reforming society, and engaging with businesses and the corporate sector is a vital element of that. We want to empower businesses to take action to eliminate slavery from their operations and supply chains to prevent infiltration of recruitment by traffickers, and we’re glad to see Marshalls’ absolute commitment to this. We have been working closely with Marshalls at all levels of its business, and its ambition to have the highest levels of integrity towards its workforce has been made clear to us.**

**“I hope our partnership with Marshalls will continue, and indeed will go from strength to strength, as we seek to achieve a business sector and a world free from slavery.”**

Ben Cooley CEO, Hope for Justice

this area. Marshalls’ has made clear to me its desire to uphold the highest levels of integrity towards its workforce and I’m confident that together we can break new ground particularly in terms of prevention, but also any remediation which might be necessary. I’m extremely pleased that Hope for Justice and Marshalls are working as partners in the fight to end modern slavery.”

Business & Human Rights Lead, Elaine Mitchel-Hill, responsible for the implementation of the Modern Slavery Act within Marshalls operations and global supply chain, commented, “While there is obviously a strong business case for this partnership in light of the Modern Slavery Act, Hope for Justice’s victim-centred approach together with their investigative expertise and ability to both rescue and remediate are extremely compelling; to my knowledge they are the only organisation in the UK able to offer this holistic end-to-end service. Our partnership has already demonstrated that by being open, frank and providing constructive challenge we can make good progress in the fight against modern slavery. Time spent in Vietnam and India during early 2017

understanding the issues in context and undertaking modern slavery risk mapping activities along the supply chains have resulted in the development of our modern slavery risk mapping processes. Increasingly it will be those organisations who continue to maintain that they remain untouched by the issues of modern slavery who will come under intense pressure to explain how this can possibly be the case in the light of this global issue.”

Hope for Justice’s training, developed through years of experience working directly with victims, law enforcement, other agencies and partners, has begun to be delivered throughout the business and supply chain by frontline practitioners in collaboration with Marshalls’ in-house training team and its Modern Slavery Ambassadors.

In terms of prevention, Hope for Justice has extensive specialist experience identifying modern slavery within the business and labour recruitment sectors. Richard Beale, Marshalls Global Supply Chain Director, said, “A proactive preventative approach is the best way to inspire confidence in our customers and workforce and minimise



risk to our brand. Together with Hope for Justice we have developed a supplier education programme focusing on modern slavery. We're currently piloting this with our temporary labour provider here in the UK and the early signs are very positive. This is part of a wider programme of activity from a procurement perspective which will send a clear message to all of our suppliers and partners about what we value, how we work and what is and isn't acceptable to us. Both myself and my procurement team are working closely with our Business & Human Rights Lead who's responsible for the implementation of the Modern Slavery Act throughout the business and supply chains. I'm delighted that in Hope for Justice we have found such a forging, responsive and hands-on partner."

With backgrounds in criminal investigation and public protection, Hope for Justice's award-winning expert teams operate out of highly successful Regional Investigative Hubs to provide proactive services to businesses partners. Hope for Justice experienced team are also geared-up to respond where potential victims are identified within business operations or supply chain.

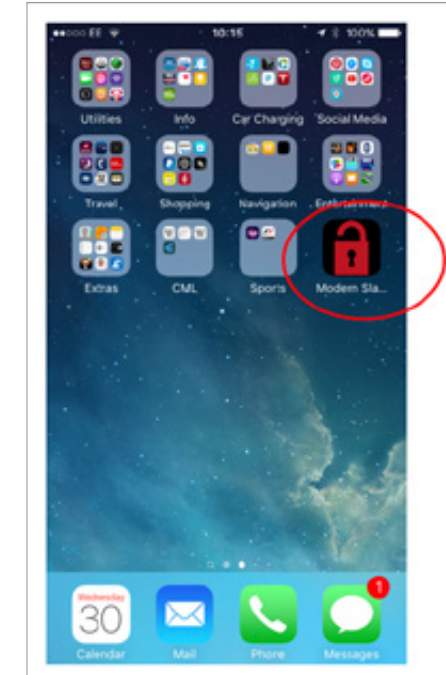
Mitchel-Hill concluded, "By acting sensitively and discreetly, Hope for Justice will safely assess an individual's situation and, if they are identified as trafficked, place them into the Government's National Referral Mechanism aftercare accommodation and support them through a remediation process. Marshalls will be guided by Hope for Justice to ensure that our business' response to any individuals identified is both supportive, appropriate and in their best interests."

1 Hope for Justice - <http://hopeforjustice.org/aboutus/>

2 Marshalls was highlighted as 'best performer' by Innovation Forum for its first Statement <http://innovation-forum.co.uk/analysis.php?s=are-modern-slavery-statements-lagging-performance>



**Modern Slavery awareness raising throughout UK business operations have given 100% of our employees the opportunity to increase their understanding of the issues of modern slavery; what it is, how to spot the signs, and how to report it.**



Posters from Marshall's Modern Slavery Internal Awareness Campaign and the Modern Slavery Awareness app





# Focus on:

## Vietnam Country Visit

Purpose:

- To see Hope for Justices operations in Cambodia on the way to Vietnam.
- To meet with Local and National Government officials in Quang Nam, Da Nang & Vinh to better understand the situation regarding trafficking and slavery, given an increase in Vietnamese nationals being trafficked into the UK during 2016.
- To meet with NGO partners working in Vietnam to gain insights and make connections.
- To better understanding the issues are in the rural areas which may lead people to become victims of trafficking.

Key Findings:

There is potential for people to be trafficked from the rural quarrying areas.

Actions:

- Supply chain modern slavery risk mapping to be undertaken during 2017.
  - Rural community awareness raising programme funded by Marshalls and delivered by Hope for Justice and in-country NGOs during 2017.
-



# Focus on: India

Purpose:
<ul style="list-style-type: none"><li>• To allow our anti-slavery partner to walk our supply chains, in both the north and south with our Business &amp; Human Rights Lead. To undertake an initial modern slavery risk mapping and to accompanying our independent Ethical Auditor. To enter into deeper discussions regarding the integration of modern slavery risk mapping and ethical auditing, and to develop a programme moving forward. To develop our processes regarding modern slavery risk mapping and how we capture, communicate and act upon findings.</li></ul>
Key Findings:
<ul style="list-style-type: none"><li>• Although long-term ethical auditing in our Indian supply chains have helped ensure that our sole suppliers’ factories are low risk, the wider stone sector requires more research specifically regarding bonded labour and slavery.</li></ul>
Actions:
<ul style="list-style-type: none"><li>• The development of a full programme of work and a further supply chain visits later in 2017.</li><li>• The provision of temporary labour – through both licenses and unlicensed brokers – was identified as an area for further investigation.</li><li>• Research to be undertaken on forced labour in the Kota region.</li></ul>



# M-Way – Marshalls Supplier Code of Conduct and Ethical & Sustainable Procurement

M-Way is our new Supplier Code of Conduct. It covers our values and why an ethical approach matters to us; ethical procurement & sustainability; anti-bribery & corruption measures; fraud & deception, open and fair competition; our commitments to employees; protecting and respecting human rights; our modern slavery commitments; protecting the environment; and what to do if you have a serious concern.



It's Marshalls-Way of doing business. M-Way makes absolutely clear the way in which Marshalls aspires to work; what we value, our approach to sustainability and how we aim to treat people. M-Way applies to all of us, and achieving our own high standards and aspirations is an expectation we have of ourselves and those that we work with.

During 2016 the procurement department, and our business and human rights lead, worked closely, together with a leading provider of online compliance training and risk management software, to develop a programme of online compliance training for suppliers on Marshalls Supplier Code of Conduct, Modern Slavery and Anti-Bribery & Corruption. This will be rolled out during the second quarter of 2017 and we look forward to reporting back on its impact in our next report.

"At Marshalls we are all guided by our values in all that we do. Leadership, Excellence, Trust & Sustainability define the decisions that we all make each and every day in the running of our business. I want there to be no doubt – to employees, suppliers, partners and other stakeholders – about how Marshalls operates; the things that we will and will not do and how we treat people. M-Way – Marshalls Way – makes this absolutely clear. It sets out what we value as an organisation and what we look for in our suppliers and partners. It also makes clear what we expect of ourselves and if you find us falling short in any way I want you to tell us. We will always support you for challenging practices or behaviours that do not meet the standards that we have set out in M-Way."

Martyn Coffey, CEO Marshalls.

"M-Way reflects Marshalls absolute commitment to ethical and sustainable procurement practice. We will only do business with responsible suppliers and subcontractors who understand the nature of the products, materials and services they supply and who recognise their responsibility to protect the environment whilst fostering good relations with their employees and local communities."

Richard Beale, Group Supply Chain Director

# M-Way Applies To You

Our code applies to all of us, and complying with it is an expectation we have of everyone we work with.

Marshalls is committed to working only with business partners whose standards are consistent with our own, and who respect our values. This includes joint

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

When you work with us, we expect you to demand these same standards of your supply chain; your partners, sub-contractors, consultants and suppliers.

## Suppliers & Partners: The Commitments We Aspire to Make To Each Other.

In our business dealings:

- 1. We value Leadership, Excellence, Trust and Sustainability.
- 2. Are honest and transparent.
- 3. Support diversity, human rights and treat everyone equally.
- 4. Select and reward people and organisations based on a fair objective process, clear expectations of what is required and demonstrated competence for the job.
- 5. Regularly, fairly and openly evaluate our own performance and the performance of others.
- 6. Meet our obligations of corporate responsibility.
- 7. Keep our promises and fulfil the commitments we make openly, honestly and promptly.
- 8. Work to resolve disputes at the earliest stage and in a manner consistent with this M-Way code.
- 9. Communicate truthfully, clearly, regularly and punctually.

# Global Supply Chains for Natural Stone

Rory Kendrick, Marshalls Natural Stone Sourcing Director

Responsible for sourcing existing and new natural stone products worldwide and identifying suitable trading partners, a key part of my work is identifying the very best in natural stone from around the world. While this involves developing products that compliment our existing product portfolio and working with our suppliers to determine product specification and service levels, it's also about making sure that the technical properties of the stone live up to the quality demanded by Marshalls 'Stone Standard'\*. When looking at technical properties we're checking water absorption, slip resistance, flexural strength, frost resistance, chemical composition and more for each stone type. While all of this this is driven by the geology in each country we source from, Marshalls' purchasing decisions are also based on the results of a rigorous due diligence process which involves desk-based assessments, supplier visits and audits against the UNGC principles covering human rights, labour,

environment and anti-corruption, ongoing third party auditing visits and clear corrective action plans if necessary, and detailed human rights impact assessments.

Our assessment for natural stone is therefore undertaken in stages resulting in a 'go/no-go' protocol. Essentially it's based primarily on adherence to the UNGC Principles, implementation of the Ethical Trading Initiative Base Code and a clear Human Rights Impact Assessment Programme.

Importantly, once a trading relationship is established I work with my colleagues in procurement, ethical labour & supply chains and business & human rights, to guide and support suppliers on a journey of continuous improvements in ethical standards wherever they are in the world, be it India, China, Vietnam, Turkey, Brazil or anywhere else.



\*Marshalls Stone Standard - <http://www.marshalls.co.uk/homeowners/assets/pdfs/driveway-garden-patio-information-sheets/marshalls%20stone%20standard%20booklet.pdf>



Stage 1:
Initial Desk-based Due Diligence Report referencing published data from sources including, but not limited to: International Peace Index Global Observatory, Human Rights Watch Global Report, Human Rights Monitor, Universal Human Rights Index Database, Amnesty International Annual Report, Transparency International's Corruption Index, Children's Rights and Business Atlas, Gender Inequality Index, Social Institutions and Gender Index, The Global Slavery Index, ITUC Global Rights Index and the International Labour Organisation.
Stage 2:
Initial Supplier Visit and Audit against United Nations Global Compact Principles – Human Rights; Labour; Environment; Anti-Corruption; <a href="https://www.unglobalcompact.org/what-is-gc/mission/principles">https://www.unglobalcompact.org/what-is-gc/mission/principles</a> – and the Ethical Trading Initiative Base Code; <a href="http://www.ethicaltrade.org/resources/eti-base-code">http://www.ethicaltrade.org/resources/eti-base-code</a> .
Stage 3:
Third Party Auditing Visit and Report resulting in a clear corrective action plan if necessary.
Stage 4:
Detailed Human Rights Impact Assessment report which is then incorporated into ongoing updates, internal briefings, and corrective action plans, etc.





## Focus on:

# Working with our temporary labour provider in the UK

De Poel's provide us with our temporary labour force; around 65 agencies throughout the UK supply in to de Poel's specifically for Marshall's. It was important both to Marshall's and de Poel's that we worked together to raise awareness of modern slavery, the organised nature of this crime and also Marshall's approach. We worked with Hope for Justice to develop an initial day's training for agencies and held this in three strategic locations.

**“It was crystal clear from discussions around the table that the modern slavery training was incredibly thought provoking. Hard hitting stories of those enslaved exposed the criminal activity driving this awful form of exploitation. It brought into sharp focus the ways in which we as suppliers of temporary labour to Marshall's must play our part to prevent slavery through forced labour. Working on this training pilot programme with Marshall's and Hope for Justice has given us the opportunity to engage fully with the issues, support the work of Marshall's as it implements its modern slavery commitments and to raise awareness of modern slavery within the labour market.”**

Sarah Marrow, de Poel, Director of People & Engagement





Modern Slavery training session



## Marshall's Modern Slavery Ambassadors

**Our Modern Slavery Ambassadors are purposefully and strategically recruited. They already hold key roles within our organisation, are fully engaged and trained regarding modern slavery and are able to use this knowledge as part of what they do. They are a point of connection and contact for those in higher risk areas.**



**Left to right:** Nigel Oseman, Training Manager, Hope for Justice, Dave Jessop & Karen Preiss, Marshall's Modern Slavery Ambassadors, Gary Booth, Hope for Justice.



## Focus on:

### Dave Jessop, Modern Slavery Ambassador

Dave is responsible for Marshalls Registered Installers; a UK-wide register of Marshalls certified patio and drive way installers. Since his appointment as Modern Slavery Ambassador he has taken swift and direct action to communicate with registered installers. He conducted awareness raising roadshows covering fourteen strategic locations nationwide in January to 230 businesses and 507 individuals. Dave has also ensured that 1,200 register member businesses have been communicated with and given information on how to spot the signs of moderns slavery, how to report and how to stay safe.

Dave says, "Installers are wholly supportive of our mission to do all that we can to prevent modern slavery. They are also motivated to be our eyes-and-ears on the ground from an economic perspective too; if someone can undercut them and take away their work because they're using slaves this has a direct impact on them. We're aware through the training and networking with anti-slavery and law enforcement agencies that the laying of patios and driveways is an area of concern. As a result of our activity with register members we've received information and intelligence which we've been able to pass on the Hope for Justice and the police which have resulted in ongoing investigations."

"I'm passionate about playing my part in preventing modern slavery and delighted that Marshalls commitment and approach is so unequivocal. To enhance my own understanding of the issues I was invited to spend a day with Hope for Justices' investigations team. Observing the investigation team gathering evidence, undertaking surveillance, engaging with vulnerable individuals and liaising with local law enforcement reinforced my commitment to do what I can to support this through my role within Marshalls."

## Focus on:

### Karen Preiss, Modern Slavery Ambassador

Since her appointment as Modern Slavery Ambassador Karen's focus has been working with her procurement colleagues and Global Supply Chain Director, Richard Beale, to build further upon ethical procurement practices by fully incorporating modern slavery risk and facilitating the training of the department on the signs of slavery and human trafficking and how the business can work to identify areas of risk and take action. Karen has been instrumental in the pilot education programme with temporary labour provider de Poel.

**"The response from those having had the training has been overwhelmingly positive. Increasing their awareness of the systematic , exploitative and 'business-like' nature of the criminals who traffic workers for forced labour was a shock to most. Armed with increased awareness of the signs and the devastating impact of modern slavery participants left with plans to make changes to the way they operate as a direct result of the training."**

Karen Preiss, Category Manager - Indirect Purchases  
Procurement, & Modern Slavery Ambassador.



## West Yorkshire Anti-Trafficking & Modern Slavery Network Engagement



“West Yorkshire is taking the issue to its heart and putting it as a priority. This is something that other regions must follow.”

Kevin Hyland, UK's Independent Anti-Slavery Commissioner

As an engaged business and a member of the local community we are looking forward during 2017 to being part of the West Yorkshire Anti-Trafficking & Modern Slavery Network. Marshalls is the first business invited to become part of this Network due to our commitment to the prevention of modern slavery. The West Yorkshire Anti-Trafficking & Modern Slavery Network was created by anti-human trafficking charity Hope for Justice in conjunction with West Yorkshire's Police and Crime Commissioner Mark Burns-Williamson after he was awarded £200,000 from the Ministry of Justice in 2014 to create and lead the network. The network currently provides a strategic meeting framework on behalf of the statutory, non-statutory and third sector organisations in West Yorkshire who contribute to tackling human trafficking and modern slavery in all its forms but is exploring how businesses can engage in support of the Independent Anti-Slavery Commissioners strategic plan.

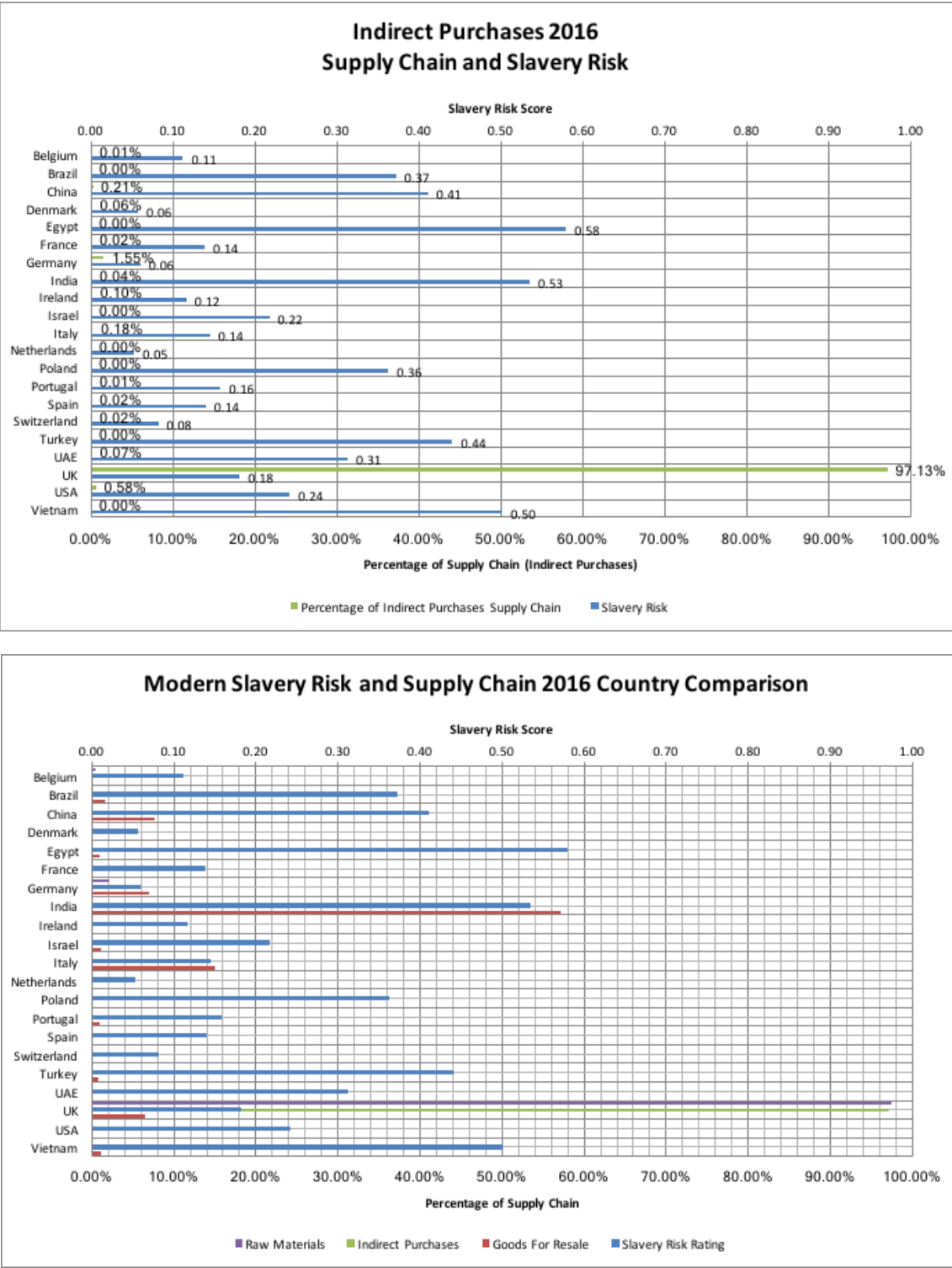
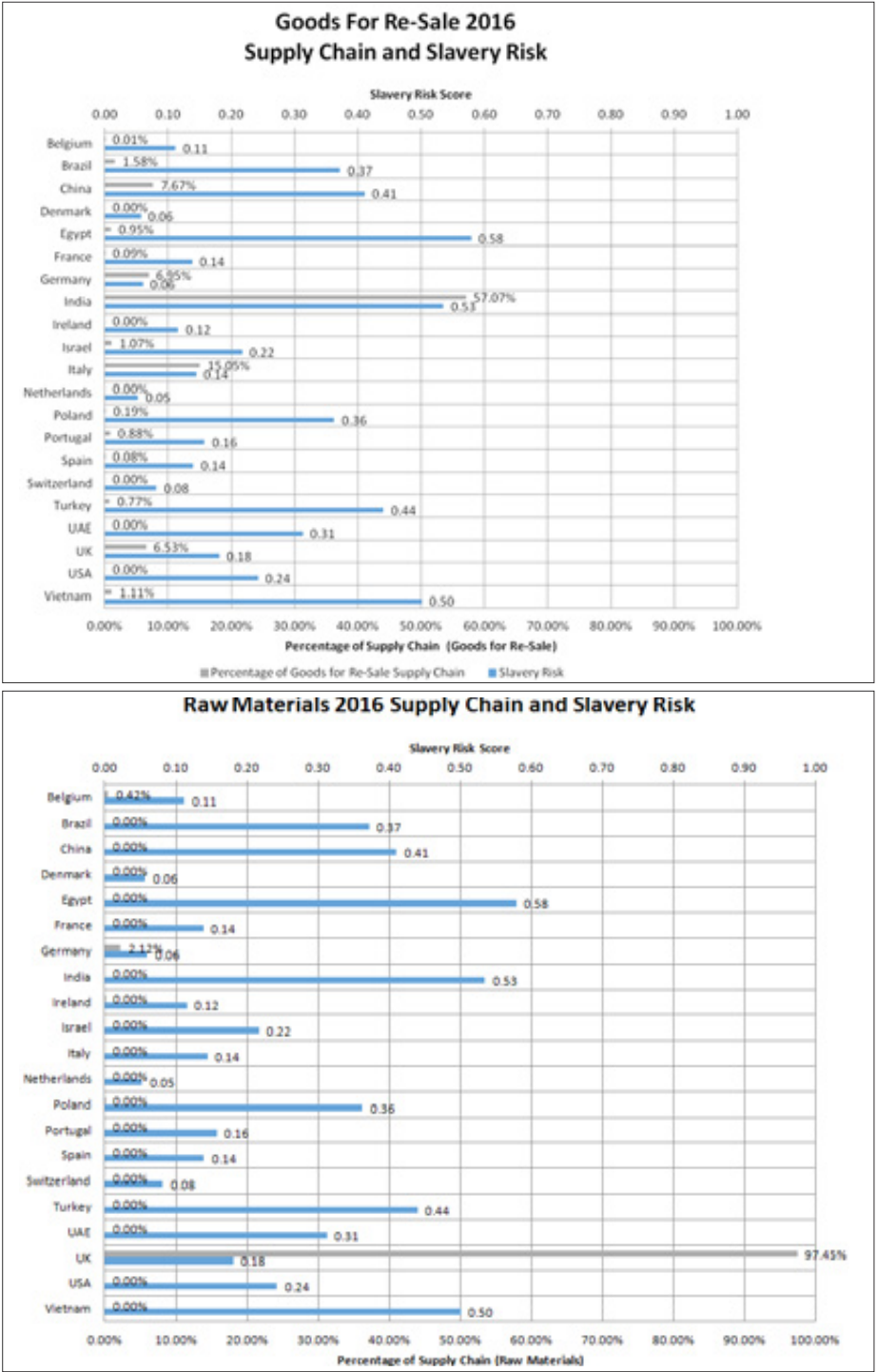




# Modern Slavery Risk Mapping & Country Profiling

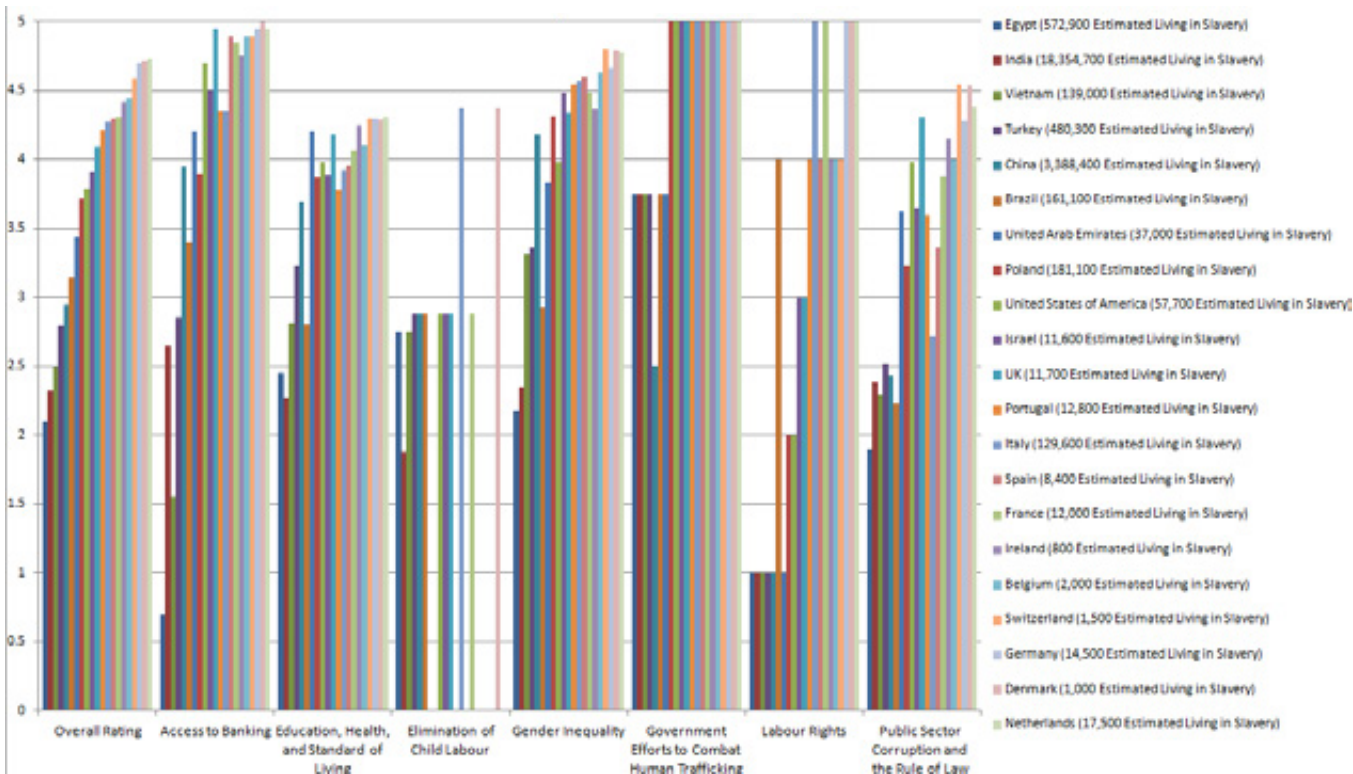
We've undertaken, and published online, extensive modern slavery risk mapping for all of our existing sourcing countries. This process is also part of our due diligence when we consider new suppliers and sourcing countries. We analyse this modern slavery risk mapping information alongside our internal data; we have developed a comprehensive commodities risk index which included goods for resales, indirect goods & raw materials. This enables us to clearly identify areas of risk and set clear priorities.

## Supply Chain Slavery Risk per country

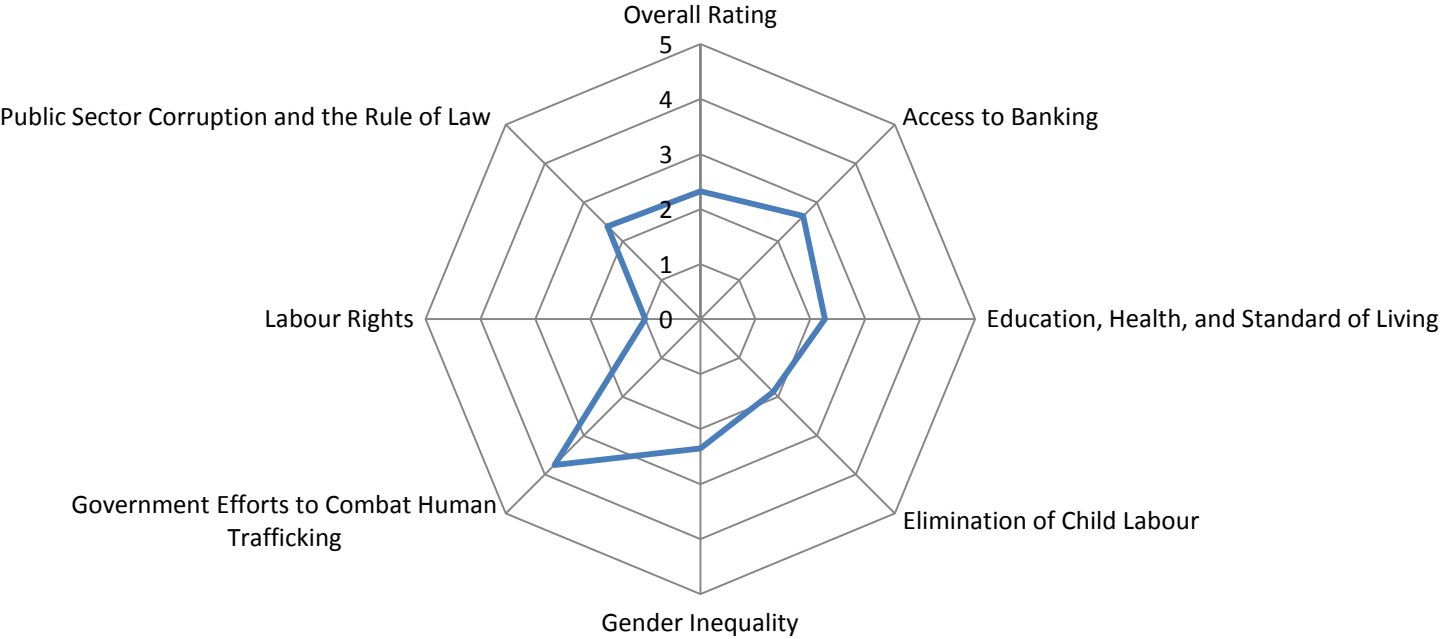




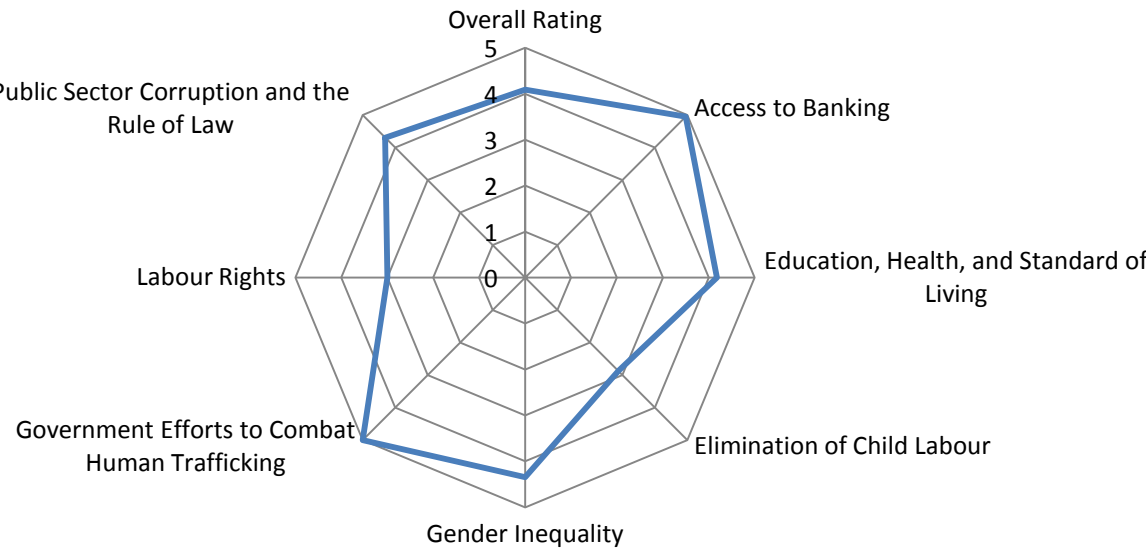
Slavery Risk Country Comparison



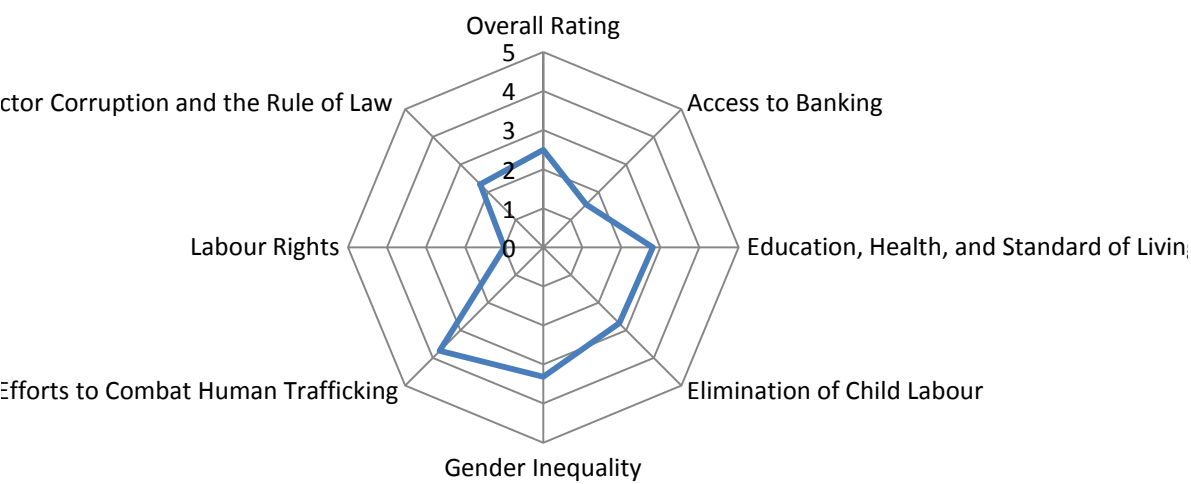
India (18,354,700 Estimated Living in Slavery)



United Kingdom (11,700 Estimated Living in Slavery)



Vietnam (139,000 Estimated Living in Slavery)



# Modern Slavery KPIs for 2017/18

We've develop clear KPIs which sits behind each of our focus areas regarding the eradication of modern slavery.

Deliver an internal awareness campaign throughout UK operations to all employees regarding modern slavery.

- Ensure that 100% employees are exposed to modern slavery awareness raising; how to spot the signs; how to report it; Marshalls response to Modern Slavery.
- Ensure that 100% of all inductions for temporary labour include modern slavery awareness.
- Increase the number of Modern Slavery Ambassadors within the business by 75% in 2017.

Modern Slavery Training for all employees involved directly in supply chains and procurement.

- Ensure that all 350 employees directly involved in supply chain management receive ongoing updates and notifications regarding business & human rights, and specifically modern slavery.

Supplier communication and verification programme which confirms that suppliers have received and understood Marshalls' position regarding modern slavery and are aware of Marshalls Modern slavery Policy & Disclosure Statement.

- Continue to roll-out supplier communication and verification platform to ensure that 95% of supplier have confirmed acceptance of Marshalls Supplier Code of Conduct, including Modern Slavery.
- Continue to develop supplier education partnerships with 50% of those identified as high risk through our modern slavery risk mapping activity.
- Engage in proactive modern slavery education programmes with those suppliers who have raised issues or concerns.

Report on our effectiveness in helping to ensure that slavery and human trafficking is not taking place in our business or supply chains including the due diligence process outlined in Marshalls Modern Slavery & Anti Trafficking Policy & Statement.

- Number of reported instances of modern slavery within our business operations and supply chain by country/supply chain.
- Number of pieces of intelligence shared with law enforcement, Gangmasters Labour Abuse Authority, Hope for Justice.
- Number of instances of modern slavery identified as a result of intelligence shared with law enforcement, Gangmasters Labour Abuse Authority, Hope for Justice.
- Number of effective partnerships & collaborations with the sole aim of preventing modern slavery in our business operations and supply chains.

Further development of the organisations supply chain due diligence, related human rights programme, external ethical auditing and modern slavery risk mapping processes 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.

- Publish supply chain moderns slavery risk mapping for 50% of the supply chain identified as high risk.
- Action an external ethical auditing and modern slavery risk mapping programme which cover 30% of supply chain identified as high risk.

Develop, in conjunction with our anti-slavery partner, a process of remediation and support for victims of modern slavery identified within the organisations operations and supply chains.

- Have in place a process of remediation and support for 50% of supply chain identified as high risk by volume of product.

# Further reading

Please also see:

## Marshalls Modern Slavery Statement

<https://www.marshalls.co.uk/documents/policies/marshalls%20modern%20slavery%20policy%20and%20disclosure%20statement.pdf>

## Marshalls Modern Slavery Risk Mapping Country Analysis and Profiles

<https://www.marshalls.co.uk/documents/presentations/country-snapshots-rationale.pdf>

## Marshalls UNGC Communication on Progress Report

<https://www.marshalls.co.uk/documents/reference/ungccopreport2016.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/humanrightspolicy.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](mailto:elaine.mitchel-hill@marshalls.co.uk)



**Marshalls**

*Creating Better Spaces*