



Marshalls



# End Modern Slavery

Marshalls plc  
Modern Slavery Risk Analysis  
2021

# Our response is multifaceted, and definitely not one size that fits all, but one which seeks to keep **the ‘human’** in human rights



**Elaine Mitchel-Hill**  
Business & Human Rights Director  
June 2021

**We’ve learned over time, as we’ve grappled with and immersed ourselves in the complexities of trying to understand what it is that we can and must do to prevent and eliminate modern slavery, that this is a fast-paced, shape-shifting and dynamic space.**

Whilst we know that risk mitigation and compliance are important, it is also for us about developing an approach which puts the victim/survivor at the centre of our desire to identify instances and to respond compassionately and appropriately. It is one which seeks to positively impact the context in which it takes place; not just within our own suppliers, but within the sectors, regions and geographies.

Our response is shaping up to be multifaceted, and definitely not one-size-fits-all, but one which seeks to keep the ‘human’ in human rights. We’ve endeavoured to share here our risk analysis approach and processes, transparently share analysis regarding the countries we source from, our salient issues, and importantly our effectiveness in identifying and remediating modern slavery.

We have also shared information regarding the work that we have done over the last 18 months, and continue to do, with Traffik Analysis Hub and the development of its advanced supply chain risk mapping tool for the private sector.

All of this information should be read alongside our 2021 Modern Slavery Statement and our 2021 End Modern Slavery Report.



## Modern slavery risk mapping

**Marshalls has undertaken, for the fifth 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 this 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 and human trafficking risks.

**Photo (front cover)**

Photo taken during worker interviews with the International Organisation for Migration (IOM) in Vietnam (credit: Elaine Mitchel-Hill, Business & Human Rights Director, 2019)

**Photo (above)**

Depicting an IOM representative talking to a supplier employee in Vietnam. (credit: Elaine Mitchel-Hill, Business & Human Rights Director, 2019)

## Contents

Introduction

**2** Risk Analysis Process

**3** Country Risk Analysis by Country

**7** Human Rights Due Diligence System

**8** Focus on Traffik Analysis Hub

**9** Effectiveness and Key Issues



**Find out more about Marshalls at:**  
[marshalls.co.uk/about-us](https://marshalls.co.uk/about-us)



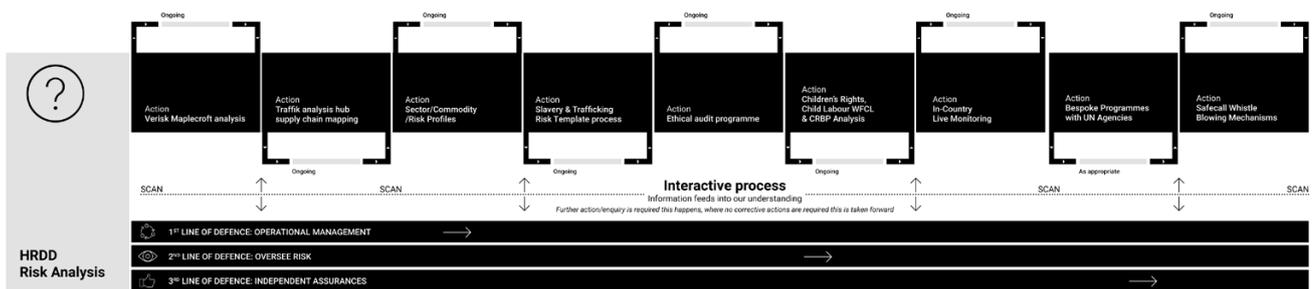
**All of this activity is documented in detail in our 2021 End Modern Slavery Report. Download it at:**  
[marshalls.co.uk/sustainability/modern-slavery](https://marshalls.co.uk/sustainability/modern-slavery)



## Risk Analysis Process

You can see our human rights due diligence system on page 7, but in its simplest linear form, this diagram shows the broad stages of our actions to help us understand where our risks may lie. We analyse using Verisk Maplecroft data; use Traffik Analysis Hub data to look at the context of new or existing suppliers, or our entire supply chain; we add to this our own analysis regarding the countries from which we source, the sectors and the commodities; undertake specific slavery and trafficking risk analysis using the Social Responsibility Alliance Slavery & Trafficking Risk Template; undertake ethical audits using the appropriate scope; consider children's rights using the Children's Rights & Business Principles Framework; increasingly use live monitoring in high risk supply chains; undertake specific assessment and bespoke programmes with UN agencies; and offer a whistleblowing hotline in high risk supply chains.

In reality, the process is often not linear. It is a 'live' process which provides constant feedback, and demands constant tending and action.



Marshall's internal modern slavery scoring matrix consists of data regarding the risk of modern slavery in specific geographies, sectoral risk and product risk. Information is taken from the following sources:

**The World Bank – Global Findex Database**  
[globalfindex.worldbank.org/](http://globalfindex.worldbank.org/)

**The World Bank – Governance Indicators**  
[info.worldbank.org/governance/wgi/index.aspx#reports](http://info.worldbank.org/governance/wgi/index.aspx#reports)

**United Nations Development Programme: Human Development Reports – Inequality-adjusted Human Development Index**  
[hdr.undp.org/en/composite/IHDI](http://hdr.undp.org/en/composite/IHDI)

**United Nations Development Programme: Human Development Reports – Gender Inequality Index**  
[hdr.undp.org/en/composite/GII](http://hdr.undp.org/en/composite/GII)

**Children's Rights and Business Atlas**  
[childrensrighsatlas.org/atlas/index/unicef\\_elimination\\_child\\_labour/2016/](http://childrensrighsatlas.org/atlas/index/unicef_elimination_child_labour/2016/)

**Social Responsibility Alliance**  
[socialresponsibilityalliance.org](http://socialresponsibilityalliance.org)

**Global Slavery Index – Government Response Rankings**  
[globalslaveryindex.org/findings/](http://globalslaveryindex.org/findings/)

**Ratification of Fundamental ILO Conventions**  
[ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011\\_DISPLAY\\_BY,P10011\\_CONVENTION\\_TYPE\\_CODE:1,F](http://ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:10011:0::NO::P10011_DISPLAY_BY,P10011_CONVENTION_TYPE_CODE:1,F)

**World Justice Project – Rule of Law Index**  
[data.worldjusticeproject.org/](http://data.worldjusticeproject.org/)

**International Trade Union Confederation – Global Rights Index**  
[survey.ituc-csi.org?lang=en](http://survey.ituc-csi.org?lang=en)

**Trafficking In Persons Report**  
[state.gov/trafficking-in-persons-report/](http://state.gov/trafficking-in-persons-report/)

**GLAA Labour Exploitation Sectoral Risk**  
[gla.gov.uk/publications/labour-exploitation/](http://gla.gov.uk/publications/labour-exploitation/)

# Country Risk Analysis by Country

We analyse, produce and share transparently Modern Slavery Country Risk Profiles for all sourcing countries as part of our risk mapping and due diligence processes. These profiles map a number of modern slavery drivers: rule of law and resilience to corruption; labour rights; government efforts to combat human trafficking; gender equality; protection of children from exploitation; education, health and standard of living; and access to banking.

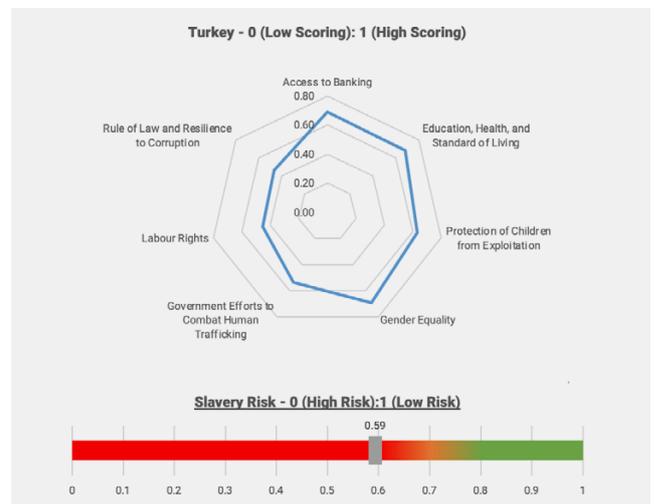
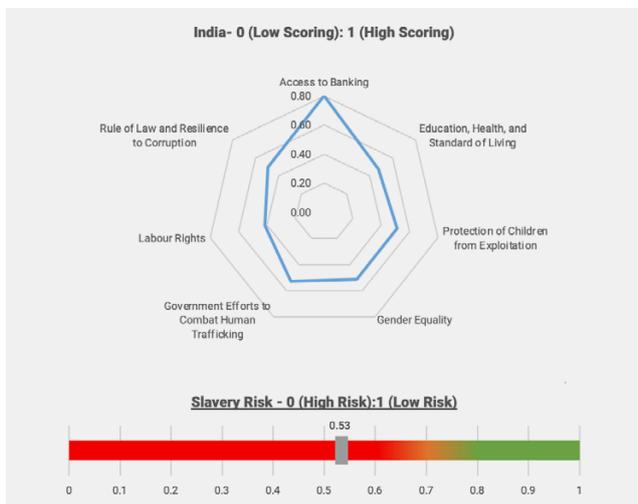
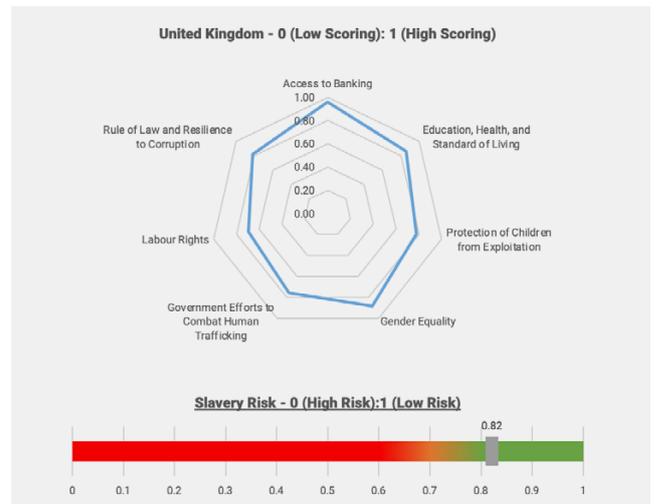
The risk profiles here and on the following pages feature suppliers with a minimum £10,000 annual spend.

Global data sources can be found on page 2.

## Top 5 Countries according to Marshalls' Modern Slavery Risk Mapping & Country Profiling

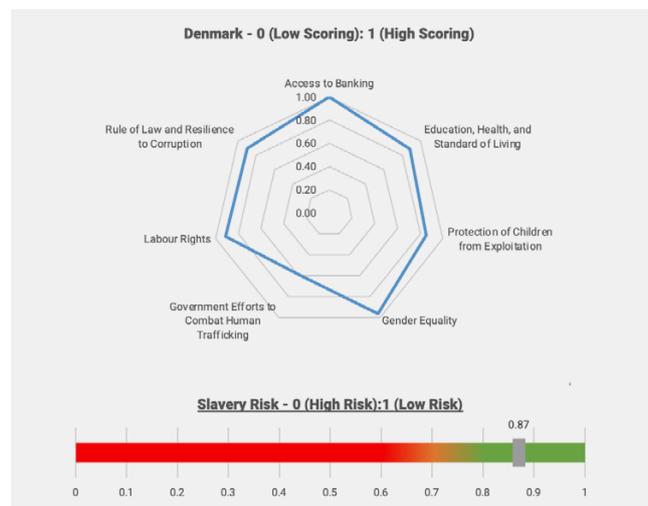
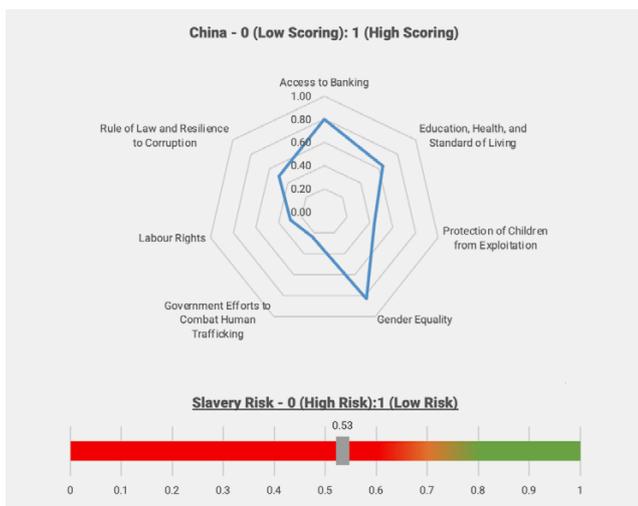
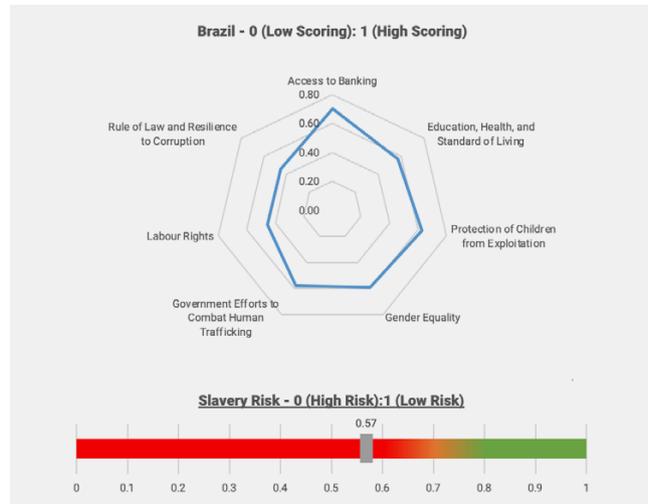
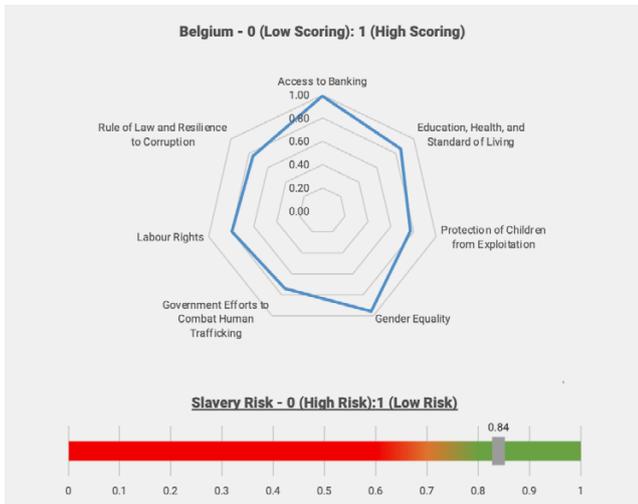
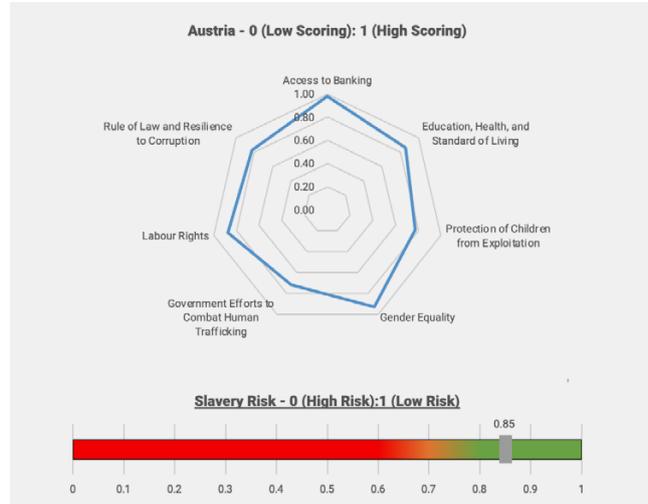
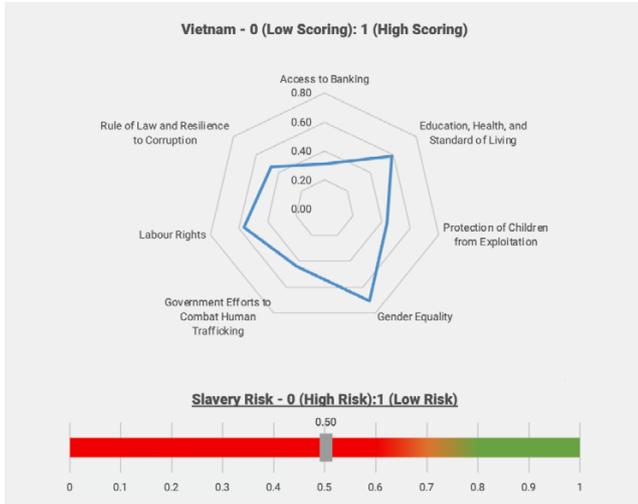
1. Egypt (risk score: 0.47)
2. Vietnam (risk score: 0.50)
3. China (risk score: 0.53)
4. India (risk score: 0.53)
5. Brazil (risk score: 0.57)

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

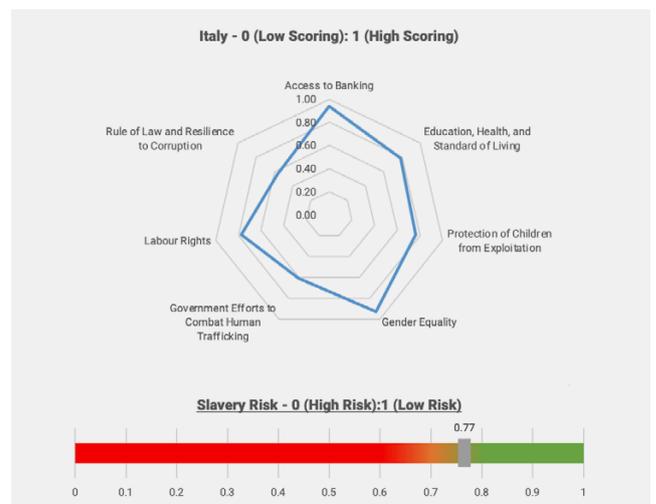
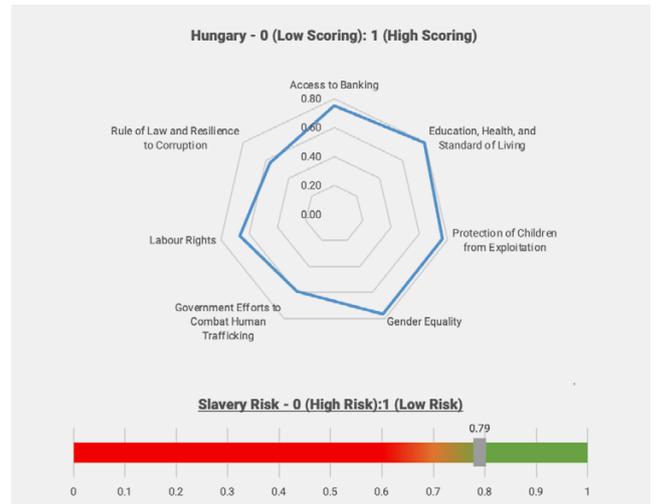
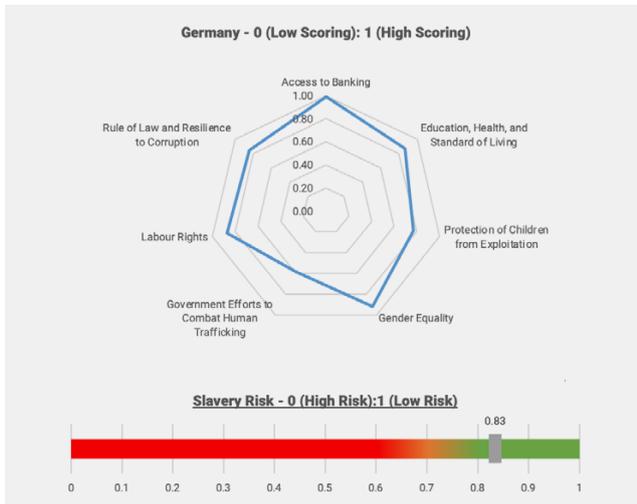
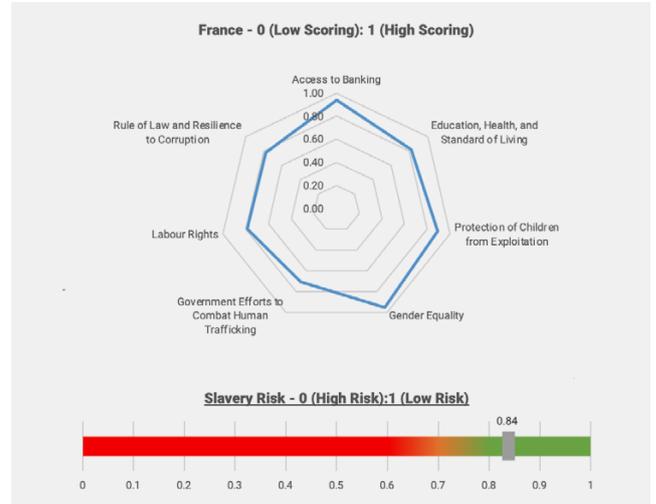
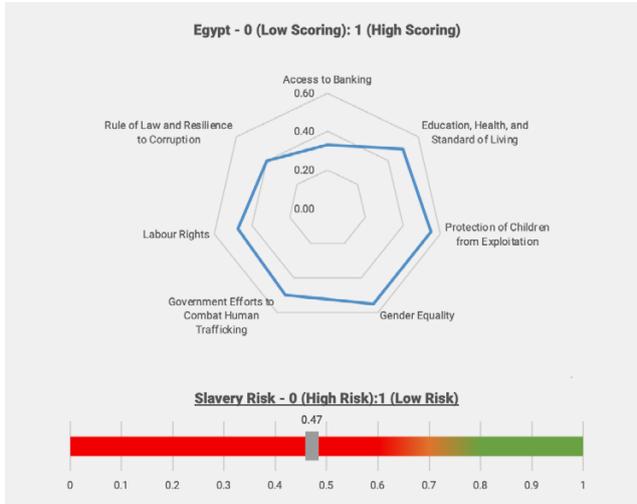




# Country Risk Analysis by Country continued



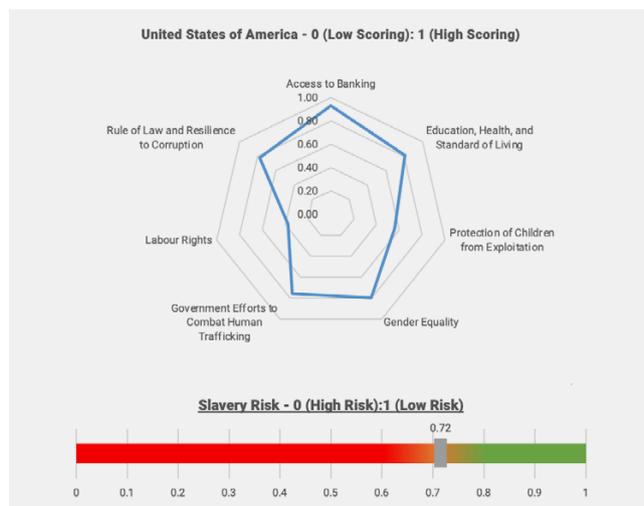
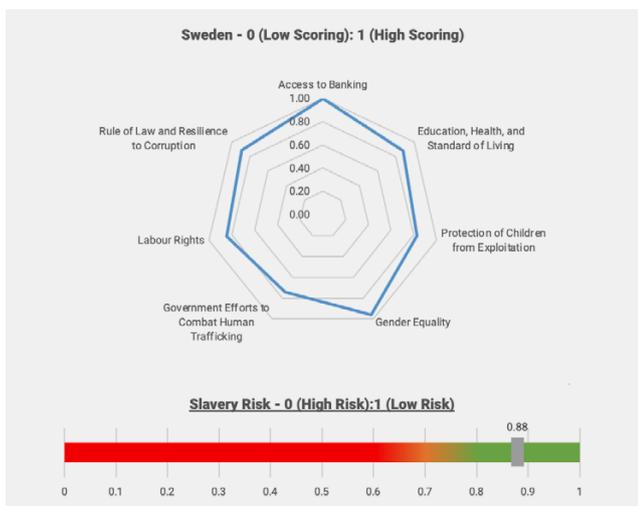
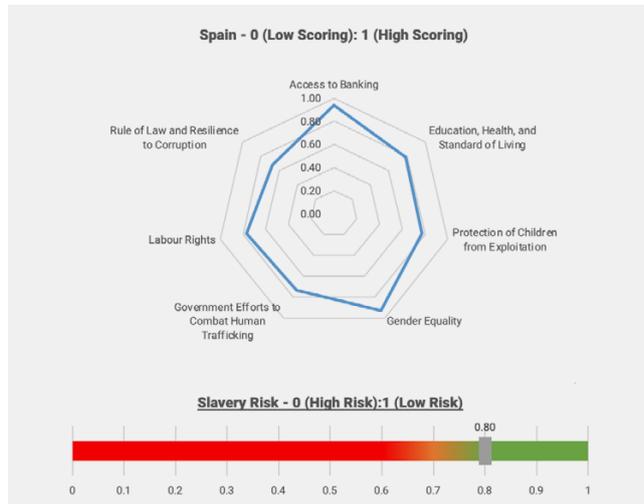
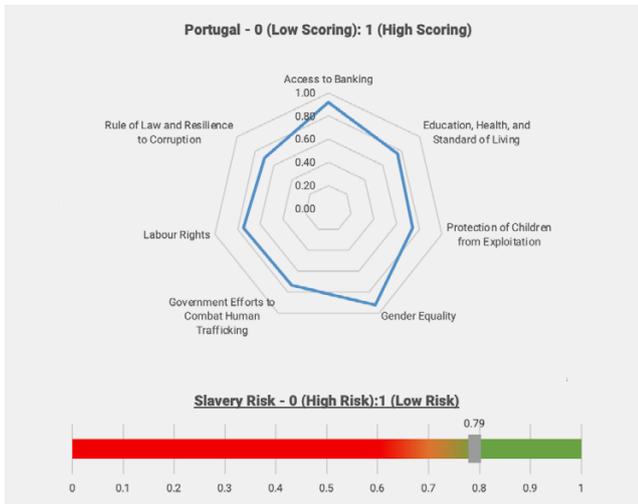
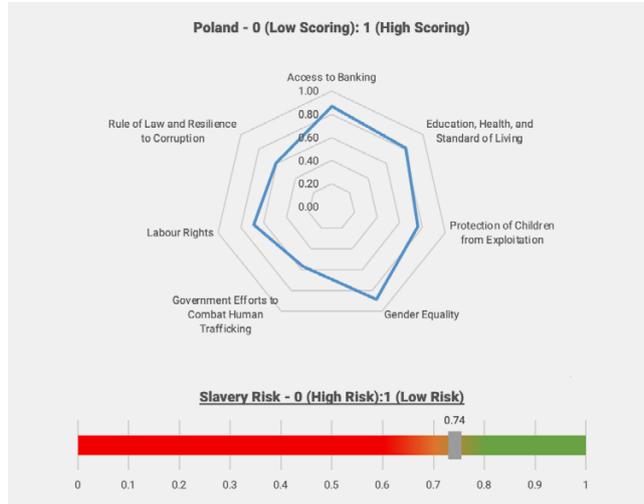
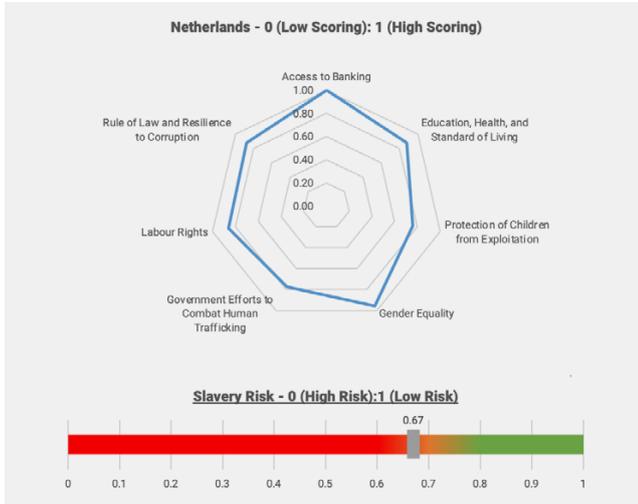
Based on suppliers with a minimum £10,000 annual spend



Based on suppliers with a minimum £10,000 annual spend



# Country Risk Analysis by Country continued



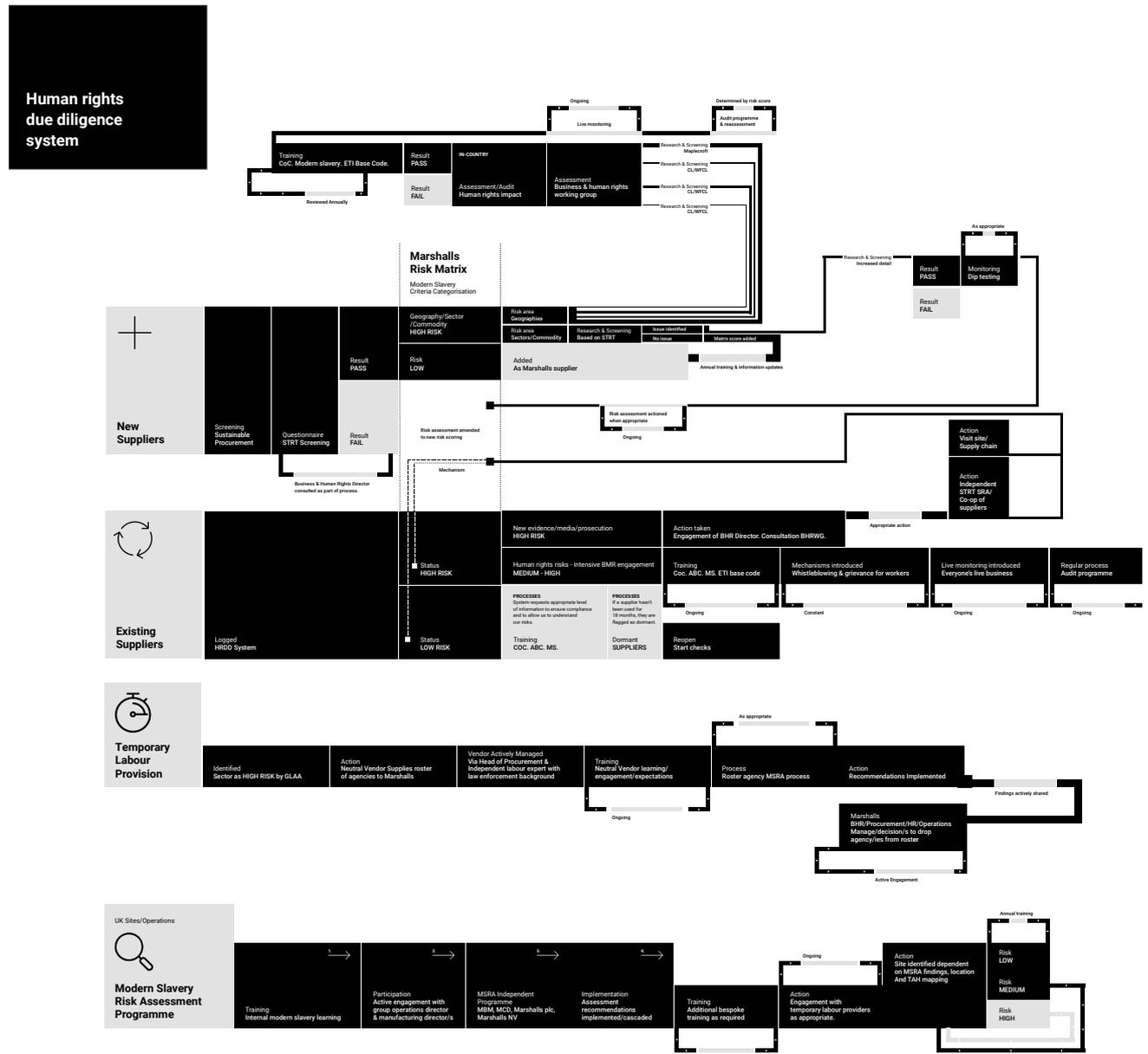
Based on suppliers with a minimum £10,000 annual spend



# Human Rights Due Diligence System

The HRDD system diagram represents a live system which is continually being developed, refined and enhanced.

We have also shared here details regarding our due diligence approach to the provision of temporary labour in the UK, and our system of modern slavery risk assessments for all of our operational sites in the UK.





# Focus on Traffik Analysis Hub

Traffik Analysis Hub is the first ever global big data project to facilitate the sharing of information about human trafficking across all geographies, industries and sectors. Marshalls committed over 12 months ago to being the first in the construction sector, and one of the first globally, to be a private sector participant.

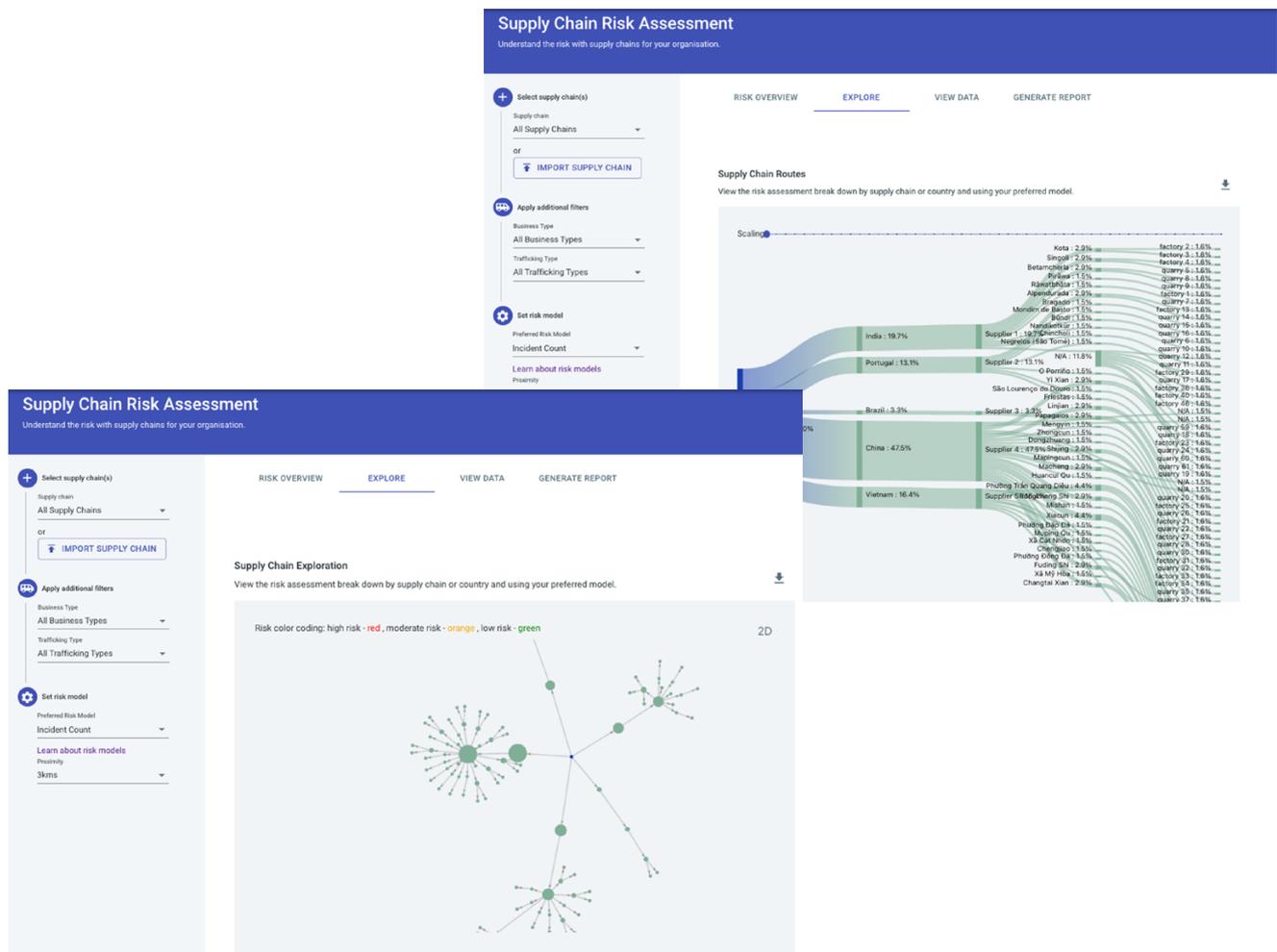
We are incredibly excited about the potential of Traffik Analysis Hub. Our Business & Human Rights Director, Elaine Mitchel-Hill, agreed to become a trustee to enable her to work closely with the team at Traffik Analysis Hub and IBM as it developed advanced supply chain mapping which enables organisations to overlay their own supply chains to see the context in which they operate in relation to instances of human trafficking and modern slavery.

As part of this development Marshalls provided data for our natural stone supply chain and was able to see in new ways and forms – as flows, diagrams and 3D mapping – our entire supply chain; from raw materials, processing, transport, shipping logistics – from one side of the world to the other.

TAH developers were able to work with this live data and to get feedback from various parts of our business – commercial, procurement, sustainability, human rights – to steer further development.

Traffik Analysis Hub is a collaboration across multiple sectors – law enforcement, third sector, finance, private sector, governments – all united by a common goal to prevent human trafficking and the harm that it does; to individuals, communities, regions, countries, commerce and to humanity.

Now more than ever, in the wake of the pandemic, technology has a unique role to play in disrupting human trafficking.



## Committed to transparency

We've developed over time – and continue to develop – what we believe to be robust systems and processes which include and address our own business operations in the UK and Europe, and our global supplier base in a number of countries across the globe.

In the wake of COVID-19 these systems have been further enhanced, and although the implementation of some aspects – such as the live monitoring – has been slowed as a result of the pandemic, all are either currently being rolled out, or will be in place by the end of 2021.

We are wholly supportive of transparency regarding the reporting of instances of modern slavery. We are also acutely aware that a measured approach is sometimes required; especially where it would be detrimental to the victims and the most vulnerable to make this public, and where we need to work internationally with governments, the UK government and UN agencies to raise international standards and work towards the often systemic change which is required.

However we will always disclose instances to relevant authorities and share with our trusted partners, such as the ILO, UN agencies and the Independent Anti-Slavery Commissioner's office.

### Salient Issues:

- › Child Labour
- › Bonded Labour
- › Forced Labour
- › Prison Labour

### Marshalls will continue to:

- › Report all instances of modern slavery to the appropriate authority; i.e. GLAA (Gangmasters & Labour Abuse Authority), law enforcement, etc.
- › Educate and empower its people to spot the signs of modern slavery and safely report in a way that feels right to them: via 999, GLAA, Crimestoppers, etc.
- › Share anonymised information of instances of modern slavery to Traffik Analysis Hub.
- › Work with Bright Future – offering the opportunity of work placements, leading to full time positions, to victims of modern slavery in the UK.
- › Share instances and insights with relevant authorities and trusted partners.

### Marshalls has:

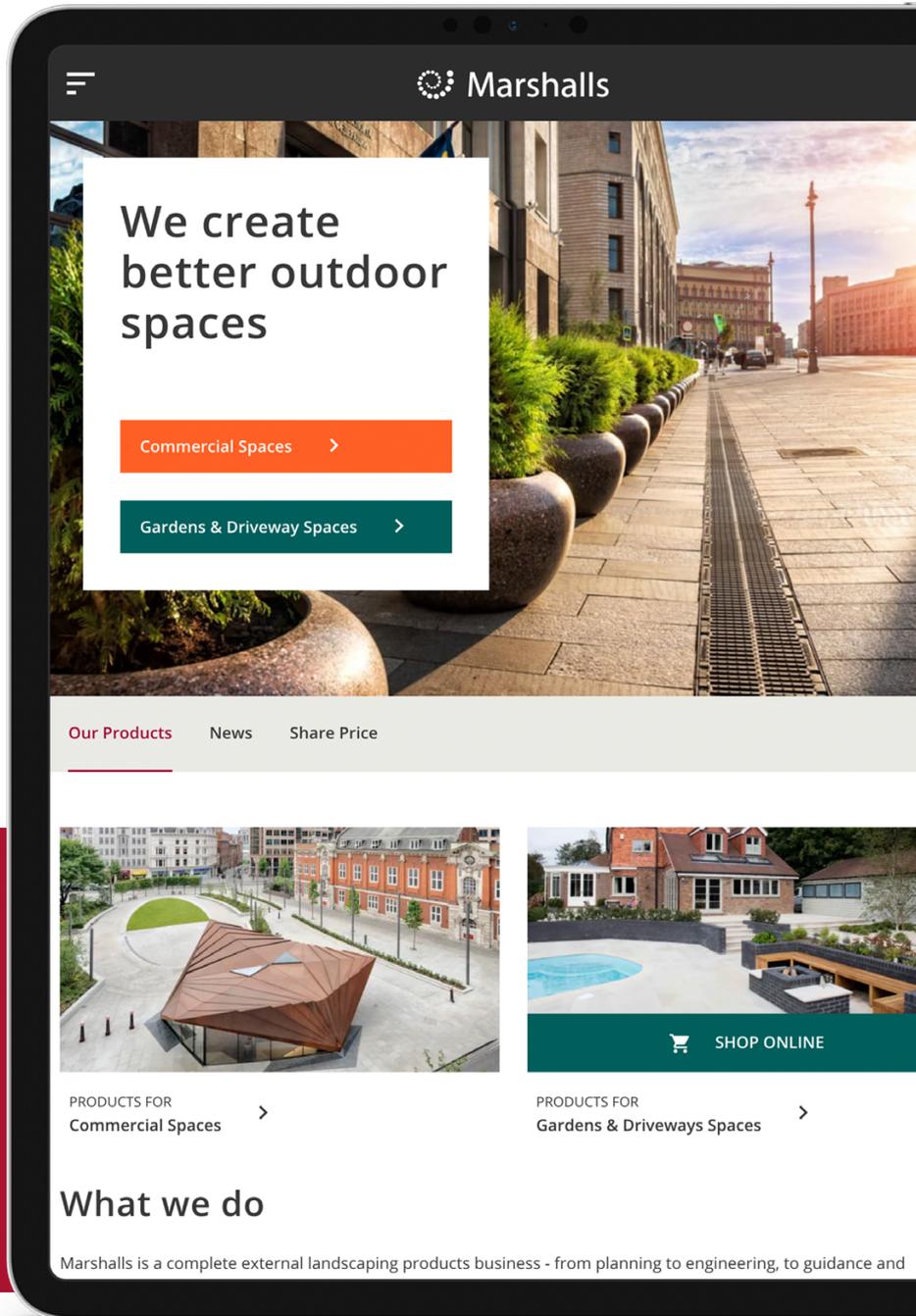
- › Undertaken an investigation of one of its UK suppliers – with full co-operation – known to be facing a historical modern slavery prosecution.
- › Developed a revised approach regarding the provision of temporary labour in the UK; engaging procurement, human resources, human rights and operations in the decision making process.
- › Ended its contract with a temporary labour agency provider.
- › Undertaken investigations with a UN agency which uncovered instances of modern slavery in its Vietnamese supply chain.
- › Subsequently undertaken a detailed independent third party audit of one of our Vietnamese suppliers.



# More information

For more information on modern slavery and other ESG-related reports and policies, please visit our website:

 [marshalls.co.uk/sustainability](https://marshalls.co.uk/sustainability)





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