



Marshalls

# End Modern Slavery

Marshalls plc

End Modern Slavery Report

2021



# No to Child Labour Yes to Children's Rights



<https://childlabourplatform.org/action/clp-conversations/>



**Martyn Coffey**  
Chief Executive  
October 2021

2021 is the UN International Year for the Elimination of Child Labour. It is also a year in which I have truly come to understand, in a way that had previously alluded me, as I believe it does other CEOs and business leaders, what it actually means for children who are exploited, how it often involves criminal activity and human trafficking, is always about money and is deeply damaging in all respects.

I had the unique opportunity, and privilege, to make an extraordinary connection as part of the UN World Day Against Child Labour back in June 2021. I met, virtually, and spoke directly with Amar Lal, a former child labourer in Rajasthan sandstone, and now a child rights lawyer. Amar posed a question to me asking: 'why, when the existence of child labour in the sandstone sector is well known, has so little progress been made?' He pressed me on how companies like

Marshalls can help accelerate action to end child labour in this sector.

This initial brief exchange resulted in a more intimate and powerful conversation a few days later. It was very open, relaxed and genuine as together we exchanged views and searched for ways in which we could come together to accelerate progress to eliminate child labour.

We recorded our conversation, which was facilitated by the ILO, and Amar and I both agree that it is increasingly important that we create opportunities for this kind of deeply meaningful interaction as we seek to find solutions together.

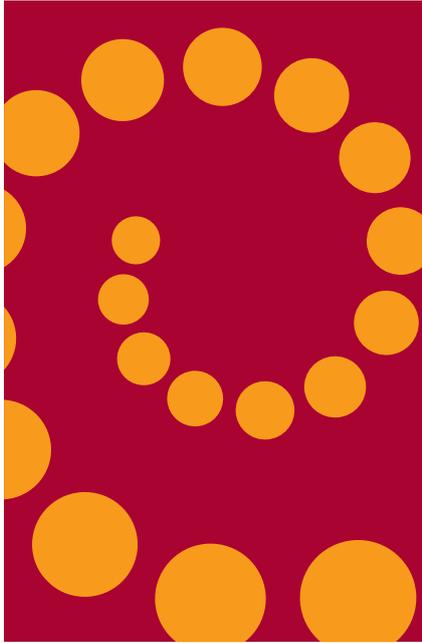
***"New global estimates released on the UN World Day Against Child Labour, by the ILO and UNICEF, tell us clearly and alarmingly that child labour is increasing for the first time in two decades."***

These figures do not include the period of the global pandemic and further research is already indicating an exponential rise as children find themselves orphaned or pushed further into impoverished and desperate situations.

We have been actively working on the issue of child labour in the sandstone sector since 2005. For us, it is not about our Tier 1 and Tier 2 suppliers, it is everything beyond; it is about the sector as a whole and the nexus of the formal and informal parts of the supply chain. It is about working together with other companies – both suppliers in India and buyers overseas – to multiply efforts, pressing the Indian government to implement the existing laws and provide social protection, compelling the domestic market for stone in India to apply the same standards demanded of overseas markets – such as the calls for mandatory human rights due diligence – and to work closely with our own government as it seeks to align

overseas aid to private sector efforts to eradicate modern slavery.

The trajectory of modern slavery legislation, the threat of sanctions if goods are deemed to be tainted by slavery, the focus from investors on ESG overall and 'S' in particular, among other drivers, means that financial performance is no longer the only important measure. We have a clear Business & Human Rights Roadmap to 2030, and have made concrete commitments in our International Year for the Elimination of Child Labour (IYECL) Action Pledge. We remain as focused and committed as ever and look forward to working in new, forging and collaborative ways which accelerate progress in all respects regarding modern slavery, and particularly upon eliminating child labour in the sandstone sector in India.



# No to Slavery Yes to Decent Work



<https://endchildlabour2021.org/pledges/say-no-to-child-labour-and-yes-to-childrens-rights/>



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

A constant thought which runs on a loop in my mind is this: how do we 'know' and how can we 'show' that we are respecting human rights?

My colleagues will have heard me say this often, whether working to embed our human rights approach and strategy within our organisation, further enhance systems and processes, push harder for supplier engagement, diving below our Tier 1 suppliers through Tiers 2, 3 and beyond into the often informal sectors, scrutinising our own operations here in the UK, or digging in my heels. It has become a simple yet powerful mantra.

Do we know? If we don't know, why don't we know? What do we need to do to ensure that we do know? How will we know when we know? Can we show? How can we show what we know? Can we trust what we know? How can we evidence our efforts and show what we know? Who do we show

what we know? Where can we share what we know to help accelerate progress? How will knowing and showing make a difference for those in our supply chain. And on, and on.

I listened avidly to the late Professor John Ruggie, author and architect of the UN Guiding Principles (UNGPs), talk about 'know' and 'show' at a panel event on the exact day (16 June 2021) that the UNGPs were endorsed by the UN ten years ago, at 2021's UN Leaders Summit.

Having been part of the UNGP consultation process and having begun our own human rights journey in 2005, when Professor Ruggie was first given his mandate, I fully appreciated the opportunity to stop and reflect on what has occurred in the intervening years. It was interesting to hear Professor Ruggie talk about the trifecta of government, business and affected individuals all being interested in the same measure in the UNGPs where the interests of each were represented. The momentum which governments added as they saw the potential to adapt the UNGPs as a policy tool. The remarkable rise of ESG investing – the 'S' much of which is about human rights – and the pace of change in this area in the last two years. And the construct of human rights due diligence as an ongoing process; engaging all stakeholders, consulting with affected individuals and communities, as a tool to assess an organisation's adverse impacts throughout the value chain, to report, to mitigate harm, and to remedy.

It's been particularly sobering to navigate human rights due diligence during the pandemic, and to be grounded and not able to be in and among our supply chains as I usually am. But it has brought forth a renewed drive and desire to revise and enhance our approach and processes, and to consider our impact.

***"We cannot underestimate how far and how fast we must all travel to achieve the eradication of modern slavery by 2025 and the elimination of child labour by 2030."***



There can be no complacency or inaction. The new global estimates on child labour, which have reversed for the first time in 20 years, make it as clear as day.

I've been working on the issue of child labour in the Indian sandstone sector for over 16 years and astonishingly there are still those who say that child labour isn't an issue. It is.

Recently I spoke with Amar Lal, a former child labourer in the Rajasthan sandstone sector, born into bonded labour and rescued at the age of eight by Kailash Satyarthi, and now a child rights lawyer, and it was a privilege. To hear him in conversation with our CEO gave me a rare moment of stillness and peace, as I listened to them share perspectives, seek out solutions and explore new ways of working together to eliminate child labour in the sector.

I watched again a compelling account from Nobel Peace Prize Laureate and Amar's rescuer, Kailash Satyarthi, in a short film about his work in India to rescue trafficked children forced into child labour. He believes, and I agree, that we all have our part to play. He says this: 'We all need to be just a little bit smart, a little bit compassionate and a little bit courageous'. And we can all do these things at least a little bit, can't we?

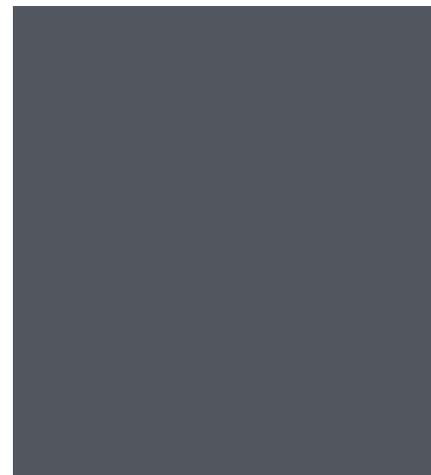
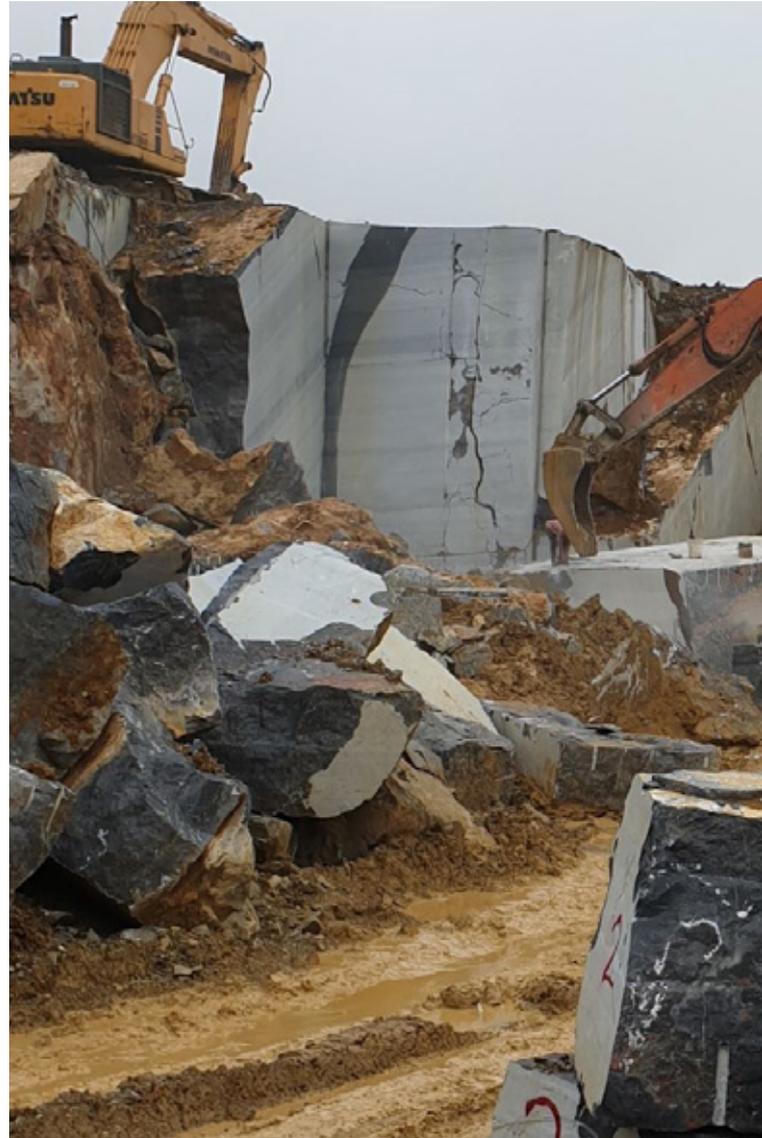
Kailash Satyarthi: The Nobel Peace Prize Winner The Mafia Wants Dead | Goalcast - YouTube



[https://www.youtube.com/watch?v=Aon06\\_j4a9o](https://www.youtube.com/watch?v=Aon06_j4a9o)

I remain deeply committed to Marshalls because it has never wavered from that day to this. It has allowed a business and human rights approach to grow and to flourish, and for many of these years, without tangible benefits. It has supported and facilitated the exploration of what organisations can and must do in support of human rights.

This is an organisation which acts with courage and continues to empower me and my colleagues to do the same.



# Marshalls Takes a Stand for Children’s Rights



We have been an active member of the International Labour Organisation (ILO) Child Labour Platform since 2015. It is a space where global brands and organisations committed to eliminating child labour in supply chains convene; to share experience, knowledge and challenges, to seek inspiration and solidarity, gain new perspectives, seek out opportunities, and to recommit to doing all that we can as businesses to accelerate progress. For us, it represents a dynamic platform where knowledge and discussions turn into concrete actions.

## ILO Child Labour Platform



ALLIANCE



We’re members of the ILO Child Labour Platform and an Alliance 8.7 partner. Alliance 8.7 is the global partnership for eradicating forced labour, modern slavery, human trafficking and child labour around the world.

As such we jumped at the opportunity to make a public International Year for the Elimination of Child Labour Action Pledge, and we’re one of 100 companies globally to do so.

### Our Child Labour Action Pledge:

<https://endchildlabour2021.org/pledges/say-no-to-child-labour-and-yes-to-childrens-rights/>

## UN World Day Against Child Labour



The World Day Against Child Labour on 10 June 2021 was marked by a high-level virtual event. ILO-UNICEF’s newly released global estimates and trends on child labour were discussed and followed by a series of extraordinary connections between high-level speakers and youth advocates on paving the way to 2025, and highlighting efforts made to implement International Year pledges.

As part of this hard hitting and powerful conversation, Marshalls’ CEO Martyn Coffey addressed a question from Amar Lal, a youth advocate and former child labourer in the sandstone sector in Rajasthan, and now a child rights lawyer. Incredibly, Amar’s rescuer, Nobel Peace Prize Winner Kailash Satyarthi, also spoke during this session.

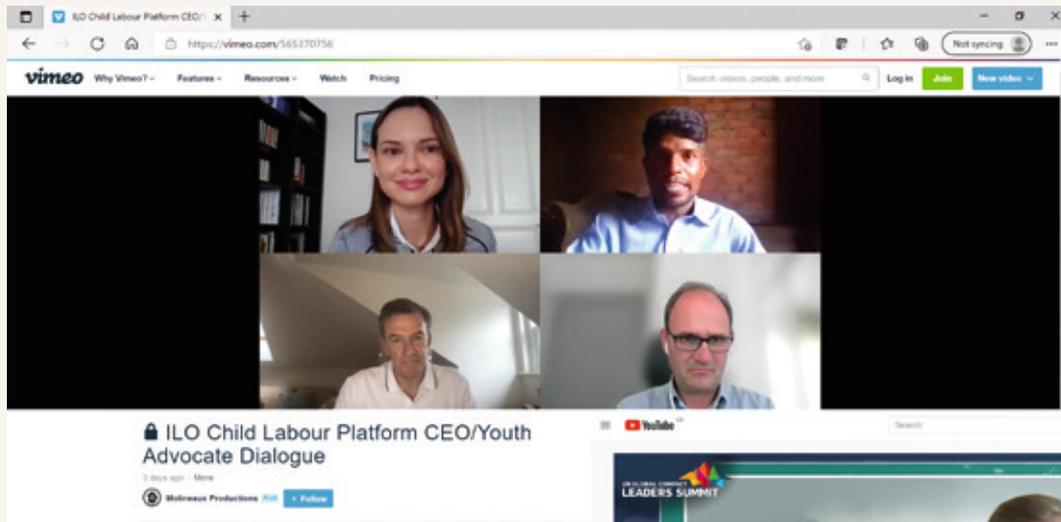
## UN Global Compact Leaders Summit



Our CEO, Martyn Coffey, stood together with leaders from Coca Cola, Ferrero and Louis Dreyfus on 16 June to speak out in support of children’s rights at the UN Global Compact Leaders Summit.

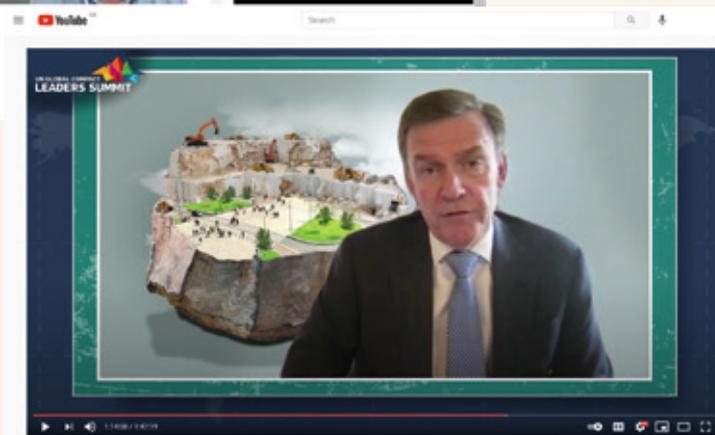
The session, Human Rights & Labour Principles: A Business Imperative, marked the 10th Anniversary of the UN Guiding Principles on Business & Human Rights.

The late Professor John Ruggie, author and architect of the Guiding Principles, Michelle Bachelet, UN High Commissioner for Human Rights, Roberto Suarez Santos, Secretary-General of International Organisation of Employers (IOE), and Dante Pesce, Chair of the UN Working Group on Business & Human Rights, spoke to the imperative of businesses to respect human rights and the requirement for human rights due diligence.



**Screenshot (above)** taken in June 2021 during the ILO Child Labour Platform CEO/Youth Advocate Dialogue featuring, clockwise from top left: Katherine Torres, ILO Child Labour Platform, Amar Lal, Child Rights Ambassador & Youth Advocate, Phillippe Vanhuynegem, Director of ILO Office for Andean Countries and Marshalls CEO, Martyn Coffey.

**Screenshot (right)** of Marshalls CEO Martyn Coffey taken during the UN Global Compact Leaders Summit in June 2021, which was broadcast in 187 countries.



### ILO Child Labour Platform CEO & Youth Advocate Dialogue



As a result of the initial extraordinary connection between our CEO, Martyn Coffey, and former child labourer and now child rights lawyer, Amar Lal, at the UN World Day Against Child Labour, a more intimate and progressive conversation took place, within a few days.

The focus of the conversation was on sharing perspectives and finding solutions to accelerate the elimination of child labour in the sandstone sector in Rajasthan.

We look forward to sharing more about this with all of our stakeholders.

### Children's Rights & Business Principles 2021 Report



At the end of 2020, we commissioned an independent agency to undertake an audit of the impact of our business operations on children in India, China, Vietnam and the UK, against the Children's Rights & Business Principles Framework.

This is the third such report that we have undertaken.

We will share the findings with key stakeholders and also publish highlights on our website.

### Social Responsibility Alliance STRT 3.0 Child Rights Lens



Marshalls is part of the Social Responsibility Alliance (SRA), a global committee which developed and maintains the Slavery & Trafficking Risk Template (STRT).

This open-source, free to use, template addresses the requirements of global legislation and helps companies of all sizes identify human rights risks. It removes financial barriers, and knowledge barriers, to engagement and as such is a powerful tool.

We are fully engaged in the review and consultation process of the STRT through a child rights lens.

# The corporate responsibility to respect human rights has never been more acute or clear.

The trajectory of human rights legislation is rapid and mandatory human rights due diligence is in view. The 16th of June 2021 marked the 10th anniversary of the UN Guiding Principles for Business and Human Rights. On that day it was good to hear Professor John Ruggie, the architect and author of the UNGPs, reflect upon corporate responsibility to respect human rights, and his emphasis on businesses' responsibility to 'know' and 'show' that they respect human rights. At the UNGC Leaders Summit event at which Professor Ruggie spoke, Marshalls' CEO stood shoulder to shoulder with other leaders from Coca Cola, Ferrero and Louis Dreyfus, and spoke up in support of human rights. With a clear Business & Human Rights Roadmap to 2030 in place, and with the 'S' in ESG – and its focus on human rights - up front and centre, Marshalls is set to continue its journey.

**Vanda Murray OBE**  
Chair



Our Modern Slavery Risk Assessment programme is well under way across all of our operational sites in the UK. It's important that we're alert to the very real risk of modern slavery in the UK, especially in the light of immigration changes as a result of Brexit, and the impact of the global pandemic. The increased vulnerability of many, coupled with labour shortages and increased demand is a potent mix which demands the full attention of the private sector.

**Simon Bourne**  
Group Operations Director



Embedding our Human Rights principles in all that we do has become second nature and as a result we have created immense pride in our achievements in such an important area.

**Louise Furness**  
HR Director



By continuing to deliver on our strong business and human rights strategy, we put survivors and our actions to prevent modern slavery at the heart of what we do. By sharing our insights and expertise, and remaining open to learning all that we can, we aim to be a knowledge partner for our own people, our suppliers and our customers so that we are all empowered to make good choices every day in support of human rights.

**Avis Darzins**  
Non-Executive Director



Our call for mandatory human rights due diligence, alongside Anti-Slavery International and others in the private sector, will help to level the playing field and accelerate improvements for workers in global supply chains. Marshalls will continue to say loud and clear, 'no to slavery' and 'yes to decent work and economic growth'.

**Angela Bromfield**  
Non-Executive Director



Customers are under increasing pressure to respond to human rights legislation and increased scrutiny from investors. Our internal Business & Human Rights Knowledge Accelerator Programme, developed specially for our commercial team, is helping ensure that we not only add value but can ensure that we can help customers make good choices in support of human rights.

**Peter Hallitt**  
Group Trading Director



We believe it's essential to capture the core information on our supply base to support Business & Human Rights objectives. This is very much a journey and we continually strive to improve the transparency of our end-end supply chain by using a combination of the right people, processes and systems.

**Richard Beale**  
Group Procurement Director



It's essential that we give all our customers the clarity and transparency necessary within our supply chain to ensure that specification and procurement decisions made, both domestically and commercially, are done so with an equal balance of consideration to humanity and cost. Saying no to child labour is not an option, it's a necessity.

**Dave Stanger**  
Trading Director – Minerals



Ensuring our products are responsibly sourced and manufactured is critical to our long-term sustainability and it's just the way we do business. It's right that we expect our suppliers to be aligned with us and as committed to protecting human rights and having zero tolerance towards modern slavery.

**Shiv Sibal**  
Company Secretary



Marshalls has consistently addressed modern slavery in its global supply chains for over 16 years, and persisted throughout two major economic shocks. Our 2021 IYEC Action Pledge seeks to engage our people, our suppliers, our customers, and the wider construction sector so that together we can accelerate faster towards the systemic change that is so badly needed.

**Chris Harrop OBE**  
Group Sustainability Director



There is no doubt about the importance of human rights and environmental due diligence. Marshalls is fully alive to this and people from across our business are working as one to ensure that we show clear leadership in the sector and do what is right.

**John Davies**  
Sustainability Improvement Director



We see an increasing focus on the importance of ethical trade and human rights in Europe.

I'm a firm believer that when companies embed these principles in their core values, it will help bringing long term sustainable growth.

**Jochen Clockaerts**  
Managing Director, Marshalls NV



The S in ESG has historically been difficult to measure. However, the focus on human rights and how we measure impact is coming under the spotlight. ESG ratings agencies and other stakeholders are requiring much more information about companies' human rights policies and activities. At Marshalls, we continue to put human rights firmly at the centre of our ESG strategy.

**Jo Holmes**  
Sustainability Stakeholder Lead

# BRE 6002 Ethical Labour Sourcing

**The power is continuous improvement; as a tool to push ourselves and continually to raise our game with our human rights work.**



**Photo (above)**

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

In 2021, Marshalls has achieved BRE Ethical Labour Sourcing Standard 6002 for the fifth consecutive year, and we are rightly proud of this.

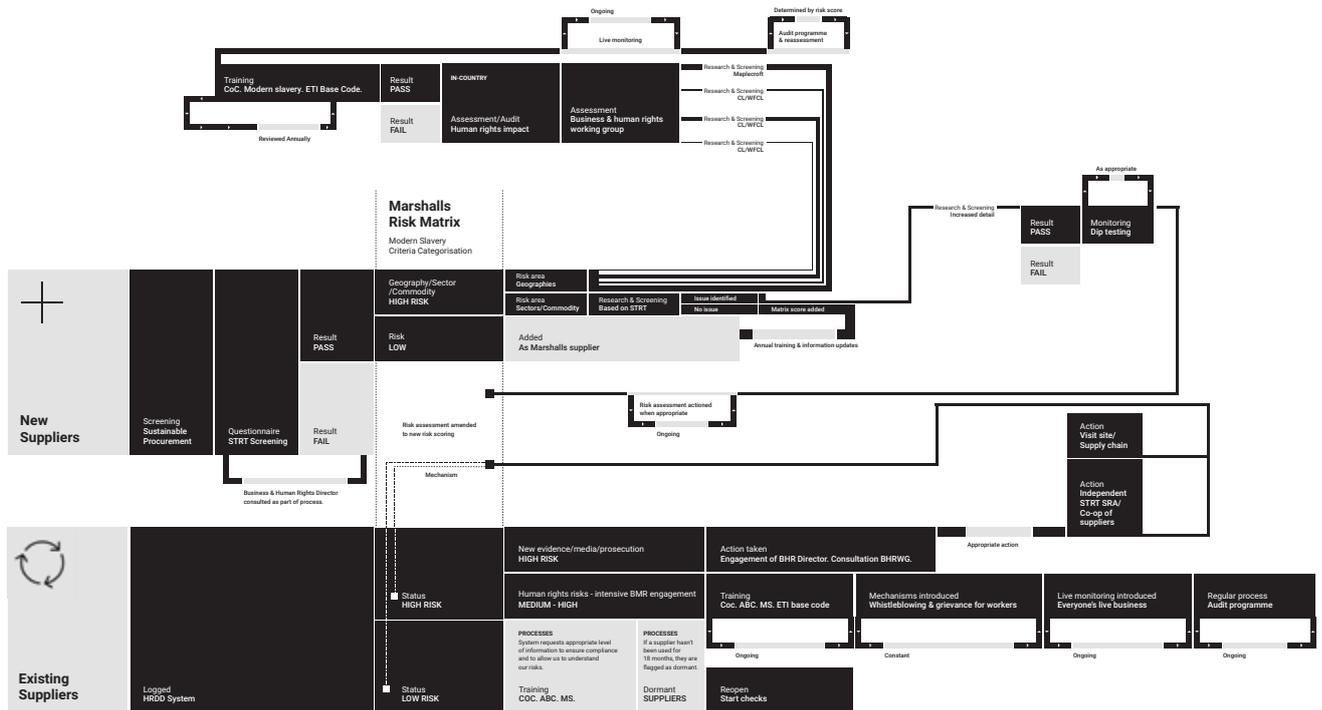
Our certification journey mirrors so much about our business and human rights path which started back in 2005. This is the same year that Professor John Ruggie was appointed special rapporteur by the UN and began his work which resulted in the Protect, Respect, Remedy Framework and ultimately the UN Guiding Principles for Business & Human Rights.

The power of BRE ELS 6002 is continuous improvement; as a tool to push ourselves and continually to raise our game with our human rights work. It can be as easy or as hard as an organisation wishes to make it because together with BRE, businesses plot the progress they wish to make and against which they are then measured. We have opted to engage with the accreditation to drive our continual improvement, to deliver back on our modern slavery statement KPIs and commitments, and essentially to harness its power.

Against the trajectory of business and human rights milestones, legal developments, and the introduction of goods sanctions firmly linked to 'hot goods' with high risk of child and forced labour, the global pandemic has most definitively presented a tipping point for business and human rights. There is no carbon offsetting equivalent for human rights. And as Professor John Ruggie makes clear, all businesses have a corporate duty to respect human rights.

For us, independent third party assurances are an integral part of our journey. We press on apace and remain open and respond to all that independent scrutiny has to offer us as we seek to accelerate progress.

# Human rights due diligence system



Our human rights due diligence approach is thorough and incorporates rigorous analysis via Verisk Maplecroft, enhanced supply chain mapping using the Traffik Analysis hub platform, and our own country risk analysis using the best available global data. This information is supplemented with knowledge gained from our extensive networks and partners in the UK and overseas.

We work continuously with higher risk suppliers to embed and implement the Ethical Trading Initiative Base Code. We recently produced a training film in Mandarin, Chinese, Vietnamese as well as English, which is currently being rolled out, together with further supplier training on our Code of Conduct.

During 2021 we introduced a human rights due diligence 'filter' within our procurement process based on the Slavery & Trafficking Risk Template (STRT). This has allowed us to further understand and manage our risks. We also utilise the full STRT within our audit process, and in tender processes.

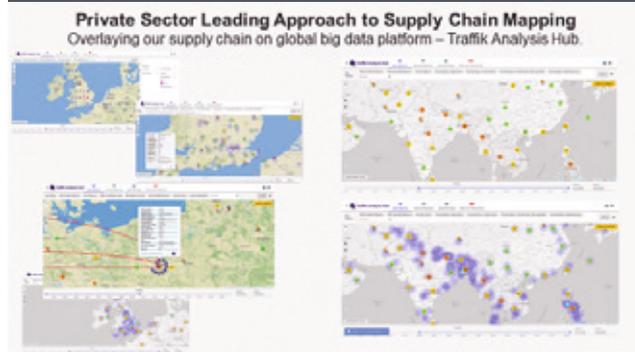
A revised and enhanced ten-stage ethical audit process has been put in place and our business & human rights team is being strengthened in the UK and the EU. We have committed to further human rights programmes in both India and Vietnam to continue our human rights due diligence work and support suppliers.

Many of the actions and collaborations which you'll find here span the Find it, Fix it, Prevent it spectrum. We've shared them in this way so that you get a broader sense of how we're actively engaged and committed to finding, fixing and preventing – from the micro to the macro; from our own operations, suppliers, wider community in the UK, to our international supply chain and extended community.

These are some of the headlines, but they don't represent the full extent of how we mobilise our value chain – such as our transport and logistics operations through our Power of Logistics initiative, working with Crimestoppers to spot and report as we deliver throughout the UK, continuing to engage with UK Government as part of the Modern Slavery Training Delivery Group, or contributing to discussions regarding aligning overseas aid to private sector efforts to eradicate modern slavery.

The global pandemic slowed our efforts to roll out the whistleblowing hotline, Safecall, in India, China, Vietnam and Brazil, along with our live monitoring app, Everyone's Business. But we're pressing on with this and expect to be able to update our stakeholders on progress later this year.

### Traffik Analysis Hub (TAH)



***"Marshalls PLC, a pioneer in challenging exploitation and modern slavery in supply chains and as an early adopter of Traffik Analysis Hub, has invested in a joint development to map its supply chain in unique combination with Traffik Analysis Hub. This modelling is the new benchmark for business to ask smarter questions of suppliers and build intelligent remediation work."***

**Neil Giles**, CEO of Traffik Analysis Hub

### Advanced supply chain mapping

We were the first in our sector, and one of the first globally, to engage with Traffik Analysis Hub (TAH) in 2019. TAH is a multi-partner global big data, initially funded by IBM to the tune of £3m but now a not-for-profit enterprise in its own right. The platform consumes information on human trafficking and instances of modern slavery which can then be analysed in multiple ways. Marshalls has been working with TAH to develop a specific supply chain tool which allows organisations to view their own supply chain data in the global, national, regional and local contexts. This in turn can be harnessed to help inform business and human rights strategy, and also human rights due diligence approaches. It also makes plain the context in which an organisation's supply chain, and the wider sector, operates.

## CCLA Find it, Fix it, Prevent it Investor Initiative



*"It's no longer enough to focus on short-term financial materiality, where many ESG policies begin and end. While delivering strong investment management returns, we also need to focus on doing what is right and correcting what is wrong."*

**Peter Hugh Smith**, CEO of CCLA

### **Engaging with the investor community to multiply efforts**

Find It, Fix It, Prevent It (FFPit) is an investor-led, multi-stakeholder project. Developed by CCLA and supported by a coalition of investor bodies, academics and non-governmental organisations (NGOs), it is designed to harness the power of the investment community.

The overarching aim is to make the corporate response to modern slavery more effective. Our Business & Human Rights Director is part of the CCLA FFPit advisory panel.

## Independent Modern Slavery Risk Assessments (IMSRA)



*"Through 2021 Marshalls proactively examined its UK labour supply chain against a backdrop of the widely reported labour shortages. This programme provided an insight into the challenges of labour supply, enabling areas of risk to be identified and mitigated for. The risk assessment has formed the basis of system and process changes to further reduce risks and maintain Marshalls' commitment to tackling exploitation in all its forms."*

**Mark Heath**, Labour Supply Risk Consultant and former Deputy Director GLAA

### **Independent Modern Slavery Risk Assessment Programme across our UK business operations**

We have well underway an enhanced programme scrutinising, with an expert in the field, all aspects of temporary labour provision - from procurement to shop floor.

We also employ IMSRAs for suppliers in high risk sectors in the UK as appropriate.

In the past six months, two such assessments have taken place; one in the temporary labour sector and one in the waste and disposal sector.

## Bright Future



**The award winning Bright Future Partnership Programme removes barriers to employment and accelerates survivors of modern slavery towards a brighter future. It provides a fast track into work with major companies in the UK on a human rights basis.**

Marshalls has been engaged since the programme began in 2017, and a founding member as Bright Future became a co-operative. The programme has helped a survivor into permanent employment every month, has an industry leading success rate and is globally recognised as best practice business charity collaboration in the area of sustainably combating modern slavery. Bright Future now has over 50 business and charity partners and is its own legal entity.

Marshalls continues to work with Bright Future to offer work placements and employment to survivors.

## PACE Consortium



**Partnership Against  
Child Exploitation**

**The Partnership Against Child Exploitation (PACE) Consortium is an international development project funded by the UK Government.**

With a budget of £12 million, PACE seeks to combat the worst forms of child labour (WFCL), which are defined in ILO convention n. 182 as all practices that include the use of children in slavery, forced labour, trafficking, debt bondage, serfdom, prostitution, pornography, forced or compulsory recruitment for armed conflict, and all forms of work that are likely to harm the safety, health or morals of children.

Marshalls' Business & Human Rights Director has continued to engage in order to understand how interventions in fragile contexts can be strengthened and lessons learned for other geographies.



# Creating Better Net Positive Futures for Everyone



## What is TruStone?

TruStone is a multi-stakeholder initiative working towards responsible business conduct in the natural stone sector. It involves the Dutch and Flemish Governments, private sector organisations, NGOs and trade unions.

## Why we're involved?

We've been working to uphold and support human rights in global natural stone supply chains since 2005. As longstanding United Nations Global Compact participants we're committed upholding the Guiding Principles, and to implementing the UN Guiding Principles on Business & Human Rights. We have reported on our progress each year since 2009 in our annual UNGC Communication on Progress Report.



## Our Business & Human Rights Roadmap

We've got a clear Business & Human Rights Roadmap to 2030 and are working for collaborative transformation in key geographies where risks are high. We actively work as part of the ILO Child Labour Platform, with the UN International Organisation for Migration, and other key partners.

### We always say YES to...

|                   |                  |                  |                         |
|-------------------|------------------|------------------|-------------------------|
| Children's Rights | Decent Work      | Prevent Flooding | Protecting Biodiversity |
| Fair Tax          | Transparent Data | Recycling        | SDG Contribution        |

### We always say NO to...

|                      |              |         |                                         |
|----------------------|--------------|---------|-----------------------------------------|
| Child Labour         | Slave Labour | Carbon  | Pollution                               |
| Bribery & Corruption | Greenwashing | Plastic | Putting profit before people and planet |

## Robust Human Rights Due Diligence Systems and Processes

We were the first in our sector to become members of the Ethical Trading Initiative in 2007 and to implement the ETI Base Code throughout our supply chains. We annually undertake Modern Slavery Risk Analysis and continually work to enhanced our systems and processes.

### TruStone Action Points for 2022

- ✓ Enhanced Supply Chain Mapping
- ✓ Roll out of Live Monitoring
- ✓ Roll out of Safecall Whistle Blowing/Grievance Hotline
- ✓ Delivery of enhanced ETI training programme
- ✓ Continued implementation of our IVECL Pledge
- ✓ Co-Chairing the ILO Child Labour Platform India Programme
- ✓ Developing a guiding framework for those buying Indian Sandstone South India Supply Chain mapping, analysis and research
- ✓ Vietnam sectoral programme delivery with the UN IOM
- ✓ Annual reporting, analysis and policy review



### BRE ELS 6002

Underpinning all of our work is independent verification. We were the first globally to achieve BRE Ethical Labour Sourcing Standard and have maintained this for five consecutive years.

marshalls.co.uk

Trustone involves the Dutch and Flemish Governments, private sector organisations, NGOs and trade unions.

We've been working to uphold and support human rights in global natural stone supply chains since 2005.

We've been participating in the Trustone initiative since its inception and are committed to delivering against our action plan for 2022.

Trustone is a multi-stakeholder initiative working towards responsible business conduct in the natural stone sector.

## Marshalls remains absolutely committed to supporting the efforts of all bodies working to identify and eradicate modern slavery and human trafficking.

Marshalls remains absolutely committed to supporting the efforts of all bodies working to identify and eradicate modern slavery and human trafficking, including key agencies and individuals in the UK: the Office of the Independent Anti-Slavery Commissioner, UK International Migration & Modern Slavery Envoy, the Gangmasters & Labour Abuse Authority (GLAA) and others. We continue to work diligently to ensure that individuals do not suffer as victims and that Marshalls does not become a corporate victim of organised criminals engaged in modern slavery and human trafficking. Since our last statement, we have:

- Reviewed, revised and strengthened our sustainable procurement human rights due diligence system and our processes.
- Continued to ensure that all of our employees are exposed to modern slavery awareness training; specifically how to spot the signs and how to report, and our stance and policies.
- Continued to deepen our engagement with suppliers with higher risk supply chain, and in higher risk geographies; working in five geographies to roll out a grievance mechanism, and develop an IT platform for live monitoring which will provide real-time information.
- Continued to actively engage with the UN, ILO Child Labour Platform, UK Government, overseas governments, international business associations and bodies on the issues of modern slavery.
- Worked in partnership with Crimestoppers in the delivery of the #slaveryonyourdoorstep campaign – making the entirety of our transport and logistics 'spot and report' collateral free to use for other businesses, as well as the production of an associated podcast featuring experts in the field, blogs, articles etc, all to raise the awareness and reporting of modern slavery.
- Continued to provide intelligence to law enforcement in the UK, including the GLAA, local law enforcement, the Modern Slavery Helpline and via Crimestoppers.
- Maintained our Power of Logistics transport and logistics initiative by undertaking a second wave of training, and also engaging two of our biggest suppliers to join forces – Tarmac and Hanson – as well as other independent organisations such as Freight Line International.
- Published our Modern Slavery Risk Analysis for 100% of our business operations and supply chains – making this publicly available.
- Undertaken advanced supply chain mapping for 100% of our natural stone highest risk supply chains, working in partnership with Traffik Analysis Hub.
- Implemented an independent Modern Slavery Threat Assessment programme throughout our UK operations, which includes 52 sites/locations.
- Undertaken an independent internal investigation for one of our highest risk suppliers in the UK in the waste and recycling sector.
- Continued to actively engage with UK Government and associated bodies to address root causes of modern slavery.
- Commissioned an independent assessment against the Children's Rights & Business Principles to better understand the impact of our business on children in the UK, India, Vietnam and China.
- Continued to work with Bright Future, and to be a founding member of its co-operative status, offering work opportunities to victims of modern slavery in the UK.

Detailed information regarding our progress in relation to each of our specific KPIs can be found in our End Modern Slavery Report at [marshalls.co.uk/sustainability/document-library](https://marshalls.co.uk/sustainability/document-library)

## Areas of Activity

As shared in our previous Modern Slavery Statement, as a result of the global pandemic, we have reviewed all aspects of our business and human rights programme to address the increased vulnerabilities of many within our business operations and supply chains. As a result we have revised, enhanced and expanded our focus areas and activities for the next 12 months – these constitute our key performance indicators.

| Focus                                                                          | Activity for the coming 12 months                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strategic collaboration to accelerate the eradication of modern slavery</b> | <ul style="list-style-type: none"> <li>› Develop/support/engage in strategic collaborations/partnerships/initiatives to identify, prevent and mitigate human rights abuses in Marshalls' own business operations and global supply chains; build knowledge, capacity and facilitate engagement from/with the wider construction sector and across sectors, as appropriate.</li> </ul>               | <ul style="list-style-type: none"> <li>› Active and deepened engagement with the ILO Child Labour Platform.</li> <li>› Delivery of our UN International Year for the Elimination of Child Labour Action Pledge ("IYECL").</li> <li>› Co-Chairing of UK Government Modern Slavery Training Delivery ("MSTD") sub-group focusing upon construction, transport and logistics.</li> <li>› Active engagement with the UNGC PACE investor initiative focusing on the worst forms of child labour.</li> <li>› Continue to work with Traffik Analysis Hub to further develop its supply chain mapping programme, and to engage the private sector.</li> <li>› Continue to engage with the Dutch and Flemish Government's responsible production and purchase of natural stone initiative, TruStone.</li> <li>› Support the work of Crimestoppers regarding transport and logistics and spot and report.</li> <li>› Support and engage in the work of CCLA Find it, Fix it, Prevent it investor initiative.</li> <li>› Establish an internal Business and Human Rights Accelerator Group to aid the embedding, implementation and delivery of the BHR Roadmap to 2030.</li> <li>› Engage with universities to support and facilitate research regarding modern slavery and human trafficking.</li> </ul> |
| <b>Remediation and support for victims/survivors</b>                           | <ul style="list-style-type: none"> <li>› Implement appropriate remediation action to ensure that victims of modern slavery, identified within our own business operations and supply chains, can access the appropriate support, and that we offer support more widely as appropriate.</li> </ul>                                                                                                   | <ul style="list-style-type: none"> <li>› Review and strengthen our process of remediation and support for 80% of the supply chain identified as high risk, by volume of product for natural stone.</li> <li>› Continue to actively engage with Bright Future – work placement/job programme for survivors of modern slavery in the UK.</li> <li>› Increase in-country presence and live monitoring.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Human rights due diligence systems</b>                                      | <ul style="list-style-type: none"> <li>› Continuously improve our human rights due diligence systems and processes, and encourage the identification of instances of modern slavery – taking appropriate action to report and also to ensure that the most vulnerable are not further adversely affected.</li> </ul>                                                                                | <ul style="list-style-type: none"> <li>› Roll out of enhanced human rights due diligence ("HRDD") supplier systems and processes.</li> <li>› Further refinement of our supplier risk analysis and resulting action following Slavery and Trafficking Risk Template ("STRT") implementation.</li> <li>› Advanced supply chain network mapping – against global human trafficking data – for all high risk suppliers.</li> <li>› Continue with specific work regarding Chinese suppliers in relation to forced labour.</li> <li>› Further progress with our enhanced Modern Slavery Risk Assessment programme across UK business operations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Effectiveness in identifying and preventing slavery</b>                     | <ul style="list-style-type: none"> <li>› Report on our efforts and effectiveness in helping to ensure that modern slavery and human trafficking is not taking place in our business operations and global supply chains.</li> </ul>                                                                                                                                                                 | <ul style="list-style-type: none"> <li>› Roll out the Safecall whistleblowing hotline in high risk geographies for natural stone.</li> <li>› Roll out live monitoring in high risk geographies for natural stone, by volume.</li> <li>› Expand the advanced supply chain network mapping to assist with prevention and identification.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Reporting on efforts to address root causes</b>                             | <ul style="list-style-type: none"> <li>› Report on our efforts to address the root causes of salient human rights issues; child labour, bonded labour, prison labour and forced labour.</li> </ul>                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>› Continue to share with appropriate stakeholders, agencies, authorities, platforms and associations, our research, findings and insights as a result of our activity with UN partners, NGOs and others.</li> <li>› Continue to engage with governments to provide evidence and intelligence, and to push for mandatory HRDD and the engagement in private sector efforts.</li> <li>› Work to deliver the 'Guiding Framework' within our IYECL Action Pledge.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Delivery of modern slavery training, and its impact</b>                     | <ul style="list-style-type: none"> <li>› Enhance, develop, shape and deliver modern slavery training which empowers and assists internal decision making in support of human rights, and increases the reporting of instances of modern slavery.</li> <li>› Active engagement in the development, shaping and delivery of modern slavery training in the UK – across sectors – using IT.</li> </ul> | <ul style="list-style-type: none"> <li>› Bespoke training for HR, procurement, operations and environmental teams.</li> <li>› Knowledge partner accelerator programme with internal colleagues.</li> <li>› Roll out of modern slavery and ETI training in four languages.</li> <li>› Continue to actively engage with the MSTD Group.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

# Marshalls' International Year for the Elimination of Child Labour (IYECL) Action Pledge

### We are all either part of the problem, or part of the solution.

Marshalls' IYECL action pledge is simple and clear. We will say 'no to child labour' and 'yes to children's rights' in every way that we possibly can as a business. We will ensure that we listen to children and those that advocate for them, that they have a voice and are heard by us.

We are taking very practical and concrete actions in four main areas:

- (1) Marshalls People:** we will ensure that our people understand the issues, are knowledgeable about the role that we play and the pledge we have made, the issues, causes and potential solutions to help ensure they can act with confidence and are empowered to make good choices every day in the job that they do in support of children's rights and the drive to eliminate child labour.
- (2) Marshalls Customers:** building the knowledge of our own commercial teams so that we become a knowledge partner for our customers; able to articulate the case for the elimination of child labour, so that customers are clear that the decisions they make have a direct impact upon children.
- (3) Marshalls Suppliers:** working with our suppliers in India to eliminate child labour, and the root causes in the natural stone sector. Our enhanced human rights due diligence processes and procedures will ensure that we exert pressure where we can to gain traction which results in the elimination of child labour.
- (4) Indian Sandstone Sector in Rajasthan:** we will continue to work with governments, civil society, workers, children's advocates and a range of actors in India to push for systemic change; as part of this, we will facilitate and drive the development of a 'guiding framework for companies sourcing sandstone from India' which works to eliminate child labour.

**How we will implement our 2021 Action Pledge:** Our 2021 Action Pledge is firmly rooted in our Business & Human Rights Strategy. We will implement it by ensuring that our sales team are knowledgeable and empowered to speak out in support of the eradication of child labour. We will overhaul and enhance our human rights due diligence processes and build a supplier engagement programme at the heart of which is the elimination of child labour. We will ensure that children's rights and the elimination of child labour is at the heart of our company-wide human rights RESPECT Programme. We will continue to work with governments, civil society, workers, children's advocates and a range of actors in India to facilitate and lead the development of 'guiding framework for companies sourcing sandstone from India'. All of this work is already in action.

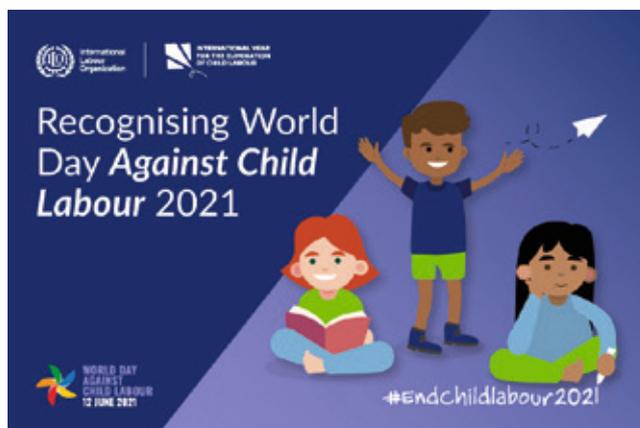
### How it will contribute to ending child labour by 2025:

By ensuring that everyone who is part of the value chain understands that the decisions they make have an impact on child labour; they are either part of the problem or part of the solution.

**How we will communicate our pledge:** Our lead Business & Human Rights communications campaign in 2021 is the International Year for the Elimination of Child Labour; this includes both internal and external stakeholders. We will speak out at events, panels and platforms. We will produce films, podcasts and other collateral to support our pledge commitments.

**The key stakeholders we will focus on/work with:** All of our employees, special programmes for our sales and procurement operations, suppliers, and specifically our suppliers in India.

Marshalls' pledge is to continue to be part of the solution; whatever it takes.



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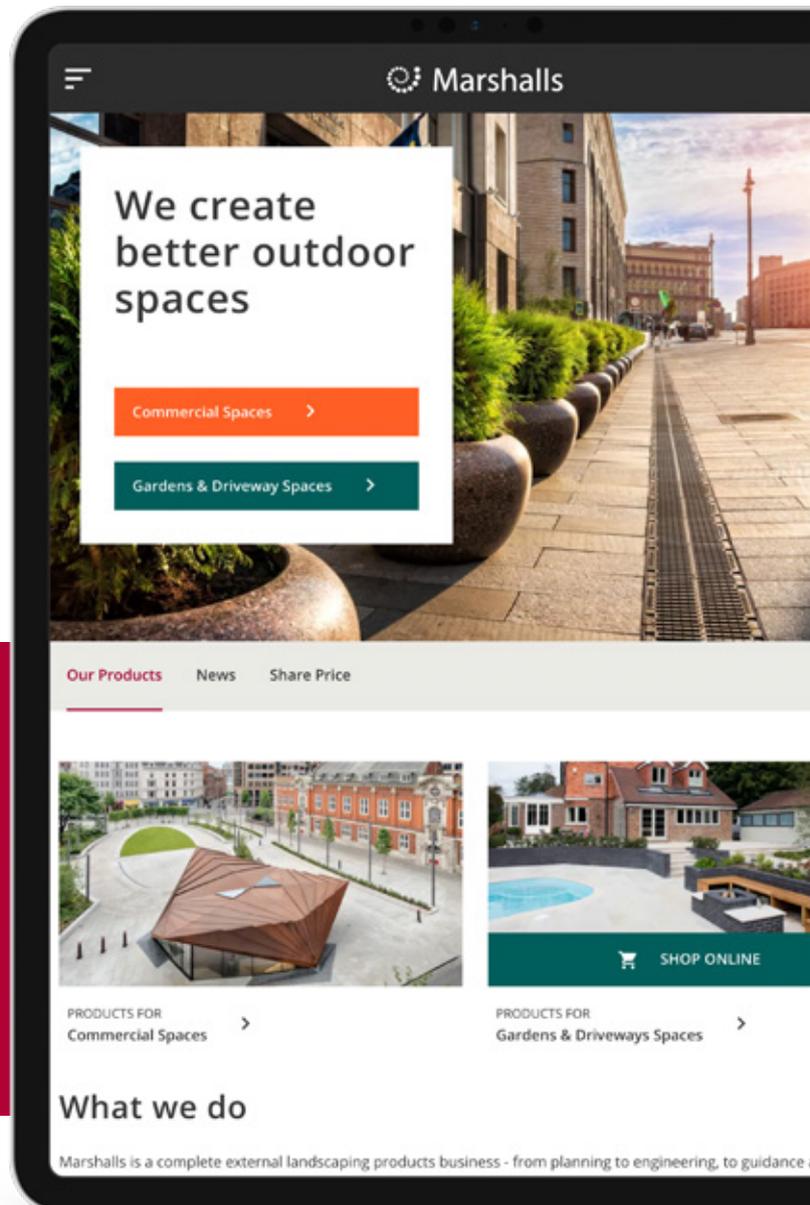
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For more information on human rights, modern slavery and other ESG-related reports and policies, please visit our website:



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

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