

# SLAVERY AND HUMAN TRAFFICKING

## MARSHALL OF CAMBRIDGE (HOLDINGS) LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Marshall Group has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity, in line with our values, in all our business dealings and relationships and to implementing and enforcing effective and proportionate systems and controls to provide reasonable assurance that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

### The Company

Marshall of Cambridge (Holdings) Ltd (the “Company”, the “Marshall Group”), is the private holding company of a family owned group. It is headquartered in Cambridge and operates globally through three wholly owned businesses:

- Marshall Aerospace and Defence Group
- Marshall Group Property
- Marshall Fleet Ventures

It is also the majority shareholder in Marshall Motor Holdings plc (an independent public company)

The Marshall Group has built its reputation over the last 110 years by adhering to core family values which are enshrined in its Code of Business Ethics, these are;

- Upholding the highest standards of integrity and fairness;
- Putting our customers above all else;
- Recognising that people are at the heart of our success; and
- Maintaining competitive edge through innovation and creativity.

By living these values, the Marshall Group differentiates itself from its competitors from just operating to a minimum acceptable standard of compliance with the many laws and regulations which apply to our businesses.

## Modern Slavery Policy and Training

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains associated with our trading subsidiaries, and consistent with our disclosure obligations under the Modern Slavery Act 2015 (“the Act”). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Our Modern Slavery Policy applies to all persons working for us and our trading subsidiaries or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The Board of Marshall of Cambridge (Holdings) Ltd has overall responsibility for the adoption of the policy and of ensuring the zero-tolerance approach to modern slavery is adopted by every operating company. As such, all Marshall Group operating companies and their subsidiaries will fully implement the principles of the policy.

It is the responsibility of each Chief Executive Officer/Managing Director to ensure that the policy and approach is adopted through their organisation to the extent relevant and appropriate to their operating company. They have the primary responsibility for implementing the policy, monitoring its use and effectiveness, dealing with any queries about it, and ensuring effective internal control systems and procedures are effective in countering modern slavery.

Furthermore, management at all levels are responsible for ensuring those reporting to them understand and comply with the policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. Prevention, detection and reporting of modern slavery in any part of our group or supply chains is the responsibility of all those working for us or under our control. Everyone is required to avoid any activity that might lead to, or suggest, a breach of the policy and they are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

If they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they are able to raise it with their manager in the first instance. Employees are also able to notify the Group Company Secretary if they know of any modern

slavery incident (actual or potential). Furthermore, employees are able to contact the Marshall Group's independent whistle blowing hotline service operated by "Expolink".

The Marshall Group encourages openness and will support anyone who raises genuine concerns in good faith under the policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Training on the policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. The Marshall Group provides on-line training for staff on the Modern Slavery Act 2015.

The entire Group adheres to the requirements included in the Act to ensure that modern slavery is not taking place anywhere in our own businesses or in any of our supply chains. As required by Section 54 (2) of the Act the following subsidiaries publish their own Slavery and Human Trafficking Statements on the following websites:

- Marshall of Cambridge Aerospace Ltd – <https://marshalladg.com/>
- Marshall Thermo King Ltd – <https://marshallfleetsolutions.co.uk/> and
- Marshall Motor Holdings plc (an independent public company) publishes its own Slavery and Human Trafficking Statement - <http://bit.ly/MMH-Human-Slavery>

This statement is in compliance with section 54 of the Act. It is made in respect of the financial year ended 31 December 2018 and will be reviewed and updated in 12 months.

**Alex Dorrian CBE**



**Executive Chairman**

**Marshall of Cambridge (Holdings) Ltd**

**2nd May 2019**