

Policy

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 in order to exploit them for personal or commercial gain.

The Modern Slavery Act 2015 places a series of obligations on companies registered in the UK to disclose their commitments to the prevention of slavery and human trafficking. In response to this, the Board of Marshall of Cambridge (Holdings) Ltd (“the Company”) has implemented its Slavery and Human Trafficking Policy to be applicable to the Company and its operating subsidiary companies (“the Group”).

The Policy sets out the overall Group position and response to modern slavery practices and enshrines the Group’s zero-tolerance approach to any forms of slavery or human trafficking in its global operations or its supply chains, in line with the Group’s values and commitment to its Code of Business Ethics and in compliance with the requirements set out in the Modern Slavery Act 2015. The Policy is subject to annual review and approval by the Board.

Principles

The Group is committed to ensuring transparency in its business and in its approach to tackling modern slavery throughout its global operations and supply chains associated with its operating subsidiary companies, as well as ensuring that it remains compliant with its disclosure obligations under the Modern Slavery Act 2015.

The Group expects the same high standards from all its contractors, suppliers and other business parties. As part of its contracting processes, the Group includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards, thereby promoting and requiring strong ethical standards for all indirectly connected supplier groups.

The Group is committed to ensuring ethical business practices exist throughout all its global operations and within its supply chains. The Group will not tolerate any practices that involve slavery, human trafficking or inhumane treatment of workers and will investigate all alleged practices that contravene this approach, taking any appropriate action as necessary to inform authorities and cease dealings with any parties engaging in unethical and illegal slavery and human trafficking practices.

A breach of the Modern Slavery Act 2015 carries serious reputational consequences for the Group. The Board therefore expects and requires that a zero-tolerance approach to slavery and human trafficking is adopted by each operating subsidiary company in the Group.

Risk assessment

The Board has ultimate accountability for managing modern slavery risk, and its approach is integrated into the broader approach to business conduct and risk management. It is considered within one of its principal risks, bribery and corruption, and takes into account the nature of the Group's business activities, the application of group policies, and the markets and geographies in which the Group operates. Overall, the Group considers its exposure to modern slavery and human trafficking risk to be low.

Application in the Group

All operating subsidiary companies are required to fully implement the principles of the Policy and must comply with it and remain compliant with UK legislation and to demonstrate the Group's commitment to combatting slavery and human trafficking practices in its supply chains.

As the Company is a non-trading holding company, it is the responsibility of each operating subsidiary company Chief Executive Officer/Managing Director to ensure that this policy and approach is adopted through their organisation to the extent relevant and appropriate to their operating subsidiary 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 the Group or under its control.

Responsibilities

It is the responsibility of the Group to ensure that its slavery and human trafficking preventative measures, procedures and protocols are appropriate to achieve high standards of integrity and business ethics throughout the Group's operations and to ensure the zero-tolerance approach to modern slavery is adopted by every operating subsidiary company.

Employees are expected to conduct themselves in a professional and responsible manner at all times ensuring compliance with all Group policies and to avoid any activity that might lead to, or suggest, a breach of the Policy. They are expected to undertake all slavery and human trafficking related training as mandated by the Group and to support the Group by contributing towards the principles and commitments the Board has set.

Reporting

Reporting of any potential slavery and human trafficking practices taking place in the supply chain is under the escalation mechanisms set by the Board, including those procedures contained in the Group's Code of Business Ethics, the Group's Whistleblowing Policy and the Group's grievance procedures. Employees are also able to contact the Marshall Group's independent whistle blowing hotline service operated by Navex Global.

Operating subsidiary company statements

Due diligence in the supply chain, further risk assessment, measuring effectiveness, and training and awareness for employees is carried out at operating subsidiary company level and more detail can be found in those statements. The following operating subsidiary companies publish their Slavery and Human Trafficking Statements on their respective websites:

Marshall of Cambridge Aerospace Ltd on marshalladg.com

Marshall Thermo King Ltd on marshallfleetsolutions.co.uk

Marshall Motor Holdings plc (in which the Group has a 65% share) on mmhplc.com

Declaration

This statement has been made in accordance with the reporting requirements of Clause 54, Part 6 of the UK Modern Slavery Act for the year ending 31 December 2020 and has been signed by the Chairman, on behalf of the Board of Directors.



Alex Dorrian CBE
Chairman
30th March 2021