

Modern Slavery

Modern Slavery and Human Trafficking statement

Modern slavery is a crime and a violation of fundamental human rights. It continues to be a priority for Marshall to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We take a zero-tolerance approach to any practices that involve slavery, human trafficking or inhumane treatment of workers and will take appropriate action in relation to all alleged practices that contravene this approach.

Our organisation

Marshall 'the Group' is an independent, family-owned group of companies with a diverse portfolio of businesses operating under our ultimate parent company, Marshall of Cambridge (Holdings) Limited.

Further information about the Group, its organisation and key activities can be found on our website at <https://www.marshallgroup.co.uk>.

Our businesses and supply chains

The Group is organised into a number of businesses in various sectors. Whilst the introductory statement and policies outlined in this statement apply across the Group, the remainder of the statement is applicable to Marshall of Cambridge (Holdings) Limited¹, Marshall ADG Ltd and the following Group operating companies², disclosing the steps they have taken to ensure that their businesses and supply chains are free from modern slavery:

Marshall of Cambridge Aerospace Limited provides services including maintenance, repair, modification, engineering and training to the Aerospace sector. Marshall of Cambridge Aerospace Limited is a UK registered company with operations worldwide, including North America and Europe.

The company's principal suppliers are industry accredited component and service providers who are used to support the various aircraft types and customer fleets which the company works on. The majority of the company's suppliers are located in the United Kingdom, North America and Europe.

¹ Marshall Skills Academy is a business unit of Marshall of Cambridge (Holdings) Limited. Further information can be found at www.marshallskillsacademy.com

² This statement excludes Marshall Motor Holdings plc, which no longer forms part of the Group.

Marshall Thermo King Limited (trading as Marshall Fleet Solutions) has three principal activities, being the sale, distribution, and service of refrigeration units for commercial vehicles, the service of tail lift equipment, and the provision of contract maintenance and fleet management products.

The company's principal suppliers are refrigeration & parts manufacturers and industry subcontractors who supply, install, repair and service refrigeration and tail lift units on commercial vehicles. The majority of the company's suppliers are located in the UK and EU.

Marshall Land Systems Limited specialises in the design and production of deployable operational infrastructure that supports humanitarian, defence and security operations across the globe.

The company's supply chain has 600 active suppliers with the majority (c80%) being in the UK. The supply base supports the manufacture of our range of ISO frame deployable infrastructure and mission systems as well as the supply of spare parts. Our suppliers provide material and components as well as contract manufacturers. A number of logistics firms (supporting delivery of products to our customers) also form part of our supply chain.

Slingsby Advanced Composites Limited produces complex composite parts & structures that are predominantly used to manufacture vital parts on aircraft, submarines, ships and defence products. The company's principal suppliers are large multi-nationals operating on a global scale.

Our policies

The policies outlined herein apply to all of our businesses, whether or not they are required to produce a statement under the Act.

Our commitment to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our businesses is underpinned by the Group:

- **Modern Slavery Policy** which reflects our commitment to acting ethically and implementing effective controls in relation to slavery and human trafficking risk.
- **Code of Business Ethics** which outlines the standards that we must all attain and sets out in how all of us should approach key relationships and conduct our business.
- **Whistleblowing Policy** which reflects our commitment to fostering and maintaining a healthy 'speak up' culture.
- **Grievance Policies** which enable employees to raise any concerns they have about their employment & set out how such grievances will be addressed by the business.

Due diligence processes and risk monitoring

The due diligence practices & processes across our businesses reflect our policies and are proportionate to the relative risks in our various areas of operation.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains, including supplier visits and audits where deemed necessary and appropriate.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistleblowers. In particular, Marshall provides access to an independent provider (Navex Global), providing a confidential 24/7 service.

We do not consider any areas of our business or supply chains to give rise to high risk in relation to modern slavery, but will continue to keep this under review.

Supplier adherence to our values and ethics

To ensure all those in our supply chain and contractors comply with our values, our supply chain practices require that, as appropriate:

- Contractual terms are included within supplier contracts, which provide commitments in relation to modern slavery.
- Suppliers confirm that no part of their business operations contradict our Modern Slavery Policy; specifically that:
 - They have taken steps to eradicate modern slavery within their businesses
 - They hold their own suppliers to account over modern slavery
 - They comply with all laws applicable to their jurisdictions

Training and awareness

Our commitment to acting ethically and with integrity is communicated to all Marshall employees via our Code of Business Ethics (which specifically references our policy and commitments relating to slavery and human trafficking). Additionally, our Marshall Fleet Solutions business provides specific training in relation to modern slavery risk.

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.

Our effectiveness in combating slavery and human trafficking

We have not identified any instances or indications that either slavery or human trafficking occurs in our respective supply chains. As such, we have not considered it necessary at this time to adopt any formal performance indicators. We continue to keep this under review.

Further steps

We intend to take the following further steps to combat slavery and human trafficking:

- Enhancing risk assessment and due diligence within our supply chains.
- Introducing new e-learning training modules during 2022.

Approval

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and following relevant board approvals, constitutes the slavery and human trafficking statement for the companies specified within the section entitled "Our businesses and supply chains"³ for their respective financial years⁴. The boards of all relevant subsidiary companies have delegated authority to Kathy Jenkins to sign this statement on their behalf.

This statement was approved by the board of Marshall of Cambridge (Holdings) Limited on the 14th June 2022.



Kathy Jenkins

Chief Executive Officer, Marshall of Cambridge
(Holdings) Limited

Date: 24th June 2022

³ Slingsby Advanced Composites Ltd is not required to make a statement under S. 54 (1), however, has elected to make a voluntary statement.

⁴ For Marshall of Cambridge (Holdings) Limited, the financial year ending 30th March 2022. For all other companies, the financial year ending 31st December 2021.