

# Modern Slavery

## Modern Slavery and Human Trafficking statement

Financial Year Ending 31<sup>st</sup> December 2022

We are pleased to provide our second Group Modern Slavery and Human Trafficking statement, which reflects our continued focus on ethical standards, in all industries and locations in which we operate.

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) Limited<sup>1</sup>, Marshall ADG Ltd and the following Group operating companies, 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.

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<sup>1</sup> Marshall Skills Academy is a business unit of Marshall of Cambridge (Holdings) Limited. Further information can be found at [www.marshallskillsacademy.com](http://www.marshallskillsacademy.com)

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.

*Marshall Thermo King Limited (trading as Marshall Fleet Solutions)* has four principal activities, being the sale, distribution, and service of refrigeration units for commercial vehicles, the sale, distribution and service of a low carbon solar power solution for refrigeration on 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 Ltd* 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 in excess of 600 active suppliers with the majority (c80%) being in Europe (mostly UK). The supply base supports the manufacture of the company's range of ISO frame deployable infrastructure and mission systems as well as the supply of spare parts. Suppliers provide material and components as well as contract manufacturing solutions. A number of logistics firms (supporting delivery of products to customers) also form part of the supply chain.

A thorough process of onboarding new suppliers has developed throughout the years within Land Systems. The company's 2023 objective is to continue supporting partners by further enhancing its values and ethics culture through Tier 2 and Tier 3 suppliers.

*Slingsby Advanced Composites Limited* produces complex composite parts & structures that are predominantly used on aircraft, submarines, ships and other defence products. The majority of the company's supply chain is constituted of UK based small and medium sized enterprises (SMEs), with certain products sourced from large, multinational companies.

## 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.

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- **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.

In our previous statement, we identified an intent to enhance risk-assessment and due diligence within our supply chains. Work has begun to identify and implement improvements in this area and these are outlined under "Further steps" below.

## 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.

In our previous statement, we identified an intent to roll-out new e-learning modules during 2022. We are pleased to confirm that this was achieved, with the majority of identified candidates completing the training as at date of publication.

## 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:

- Introduction of new Supplier Codes of Conduct within the Aerospace, Land Systems and Fleet Solutions businesses, publicly available on relevant websites and included within standard terms of business.
- Continuation of e-learning as identified within the “Training and awareness” section above.
- Introduction of web-based third-party monitoring software within the Aerospace business, to highlight red flags within the supply chain which require action associated with Modern Slavery risk, including news articles, court cases and associated judgments where available.

## 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”<sup>2</sup> for the financial year ending 31 December 2022. 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 7<sup>th</sup> June 2023.

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<sup>2</sup> Slingsby Advanced Composites Ltd is not required to make a statement under S. 54 (1), however, has elected to make a voluntary statement.



Kathy Jenkins

Chief Executive Officer, Marshall of Cambridge  
(Holdings) Limited

Date: 21 June 2023