

# Modern Slavery Statement 2024



## Welcome from the Chief Executive

# A transformative year for Marshalls



**Matt Pullen**  
Chief Executive  
Marshalls plc

“  
Our approach is continuously reviewed and adapted to address the risks and challenges we face

## Welcome to our Modern Slavery Statement for 2024

2024 has been a transformative year for Marshalls as we launched our new strategy, 'Transform & Grow', guided by our purpose, 'Building Tomorrow's World.' This purpose builds on decades of expertise and know-how, our pioneering spirit, and a deep commitment to care, ultimately shaping environments that inspire today and endure for generations. Our new strategy and purpose have led us to review businesses, brands, and product portfolios, with a strong focus on safeguarding workers both in the UK and abroad.

We have been critically evaluating our ethical goals, asking ourselves: What is truly effective? Where can we improve? Where can we make the most significant impact?

With two decades of experience in the anti-slavery sector, we understand that risks vary greatly by region, influenced by factors such as local laws, cultural norms, poverty, and migration. Therefore, we continue to adopt a nuanced approach, exploring what is achievable and realistic across different industries and jurisdictions.

In 2024, we conducted two visits each to China and India, our largest spend in countries outside the UK. Despite operating in different sectors—high-tech solar panels in China and natural stone in India—these trips shared a common goal: to delve deeper into supply chains and engage with suppliers at every level. In China, we evaluated our commercial partners' readiness for international ESG and traceability standards, tracing back to the early stages of raw material processing. In India, we collaborated with a local ethical supply chain expert to understand the current challenges in natural stone extraction and production, both within our supply chain and the local region.

Back in the UK, we have been refining our onboarding processes and are taking steps to engage more closely with our UK supply chain, work that is continuing in 2025.

Our approach is continuously reviewed and adapted to address the risks and challenges we face in our supply chain. We strive to keep learning, remain flexible, and stay alert to the evolving risk landscape, both for our employees and our partners, in the UK and abroad.

**This Modern Slavery Statement was reviewed and signed off by the Marshalls Board on 11 March 2025.**

## Highlights of 2024



### Natural stone

- Piloted the XertifiX ethical improvement and certification scheme in Chinese natural stone
- Audited four quarries and three factories in two Chinese provinces
- Made two visits to India for baseline assessments of the natural stone supply chain



### Solar

- Made two trips to China to meet lower tier suppliers
- Fully mapped our polysilicon supply chain to tier seven
- Assessed the readiness of the supply chain for external ESG and traceability standards
- Extended our sourcing specification agreements to cover tier six



### Supply chain

- Assessed 30 supplier countries on human rights risk
- Introduced a new red, amber, green risk score to our supplier onboarding process
- Made seven interventions with UK suppliers on real living wage
- Commissioned a social audit of one SME contractor in the UK
- Organised a special training day for procurement colleagues on ethical supply chain challenges in the UK and overseas



## Introduction and contents

### What this statement covers

This statement covers the activities of the Marshalls group of companies (including Marshalls plc and its direct and indirect subsidiaries, referred to in this statement as "Marshalls") to identify, address, monitor and prevent risk of modern slavery entering its operations and supply chains between January and December 2024.

Marley Group plc joined Marshalls in 2022. Marley manufactures pitched roofing products including clay and concrete roof tiles, timber battens and integrated solar panels. Since then, work has been ongoing to align systems, policies and processes.

Wherever possible, statements made in this document cover all businesses within the Marshalls Group. We will state where this is not the case.

### How Marshalls does business

Marshalls is committed to: conducting business responsibly and with honesty and integrity; treating people with dignity and respect and complying with applicable laws, regulations and treaties.

We are also committed to protecting and promoting human rights in how we operate our businesses. We don't tolerate child labour, forced labour, prison labour, modern slavery or any methods to gain control over another person for the purpose of exploitation, including coercion, fraud, deception or abuse of power.

We respect international principles of human rights including, but not limited to, those expressed in the UN Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, United Nations Global Compact Principles, Children's Rights and Business Principles, Women's Empowerment Principles and those principles contained within the UK's Modern Slavery Act 2015.

We comply with employment laws and expect those with whom we do business to comply with all relevant local legislation. Our Code of Conduct specifies supplier obligations to align with our values, understand the risk in the areas in which they operate and commit to putting things right when they have gone wrong.

**Our anti-slavery strategy is guided by our commitment to the UN's Sustainable Development Goals (SDGs). The SDGs towards which we believe we can make the most positive contribution are:**



**Signatory to the  
United Nations  
Global Compact**  
Since 2009



**Superbrand**  
Since 2010



**Fair Tax Mark**  
Since 2015



**Living Wage Employer**  
Since 2014



### Contents

#### Glossary

Page 4

## One

Our structure, operations  
and supply chains

Page 5

## Two

Our policies in relation to modern  
slavery and human trafficking

Page 8

## Three

Our processes for identifying  
and managing risk

Page 10

## Four

Our processes for due diligence on  
parts of supply chain most affected

Page 17

## Five

Measuring our effectiveness:  
our goals and progress

Page 20

## Six

Our training programmes

Page 22

## Glossary

### Glossary

**Child labour** is the exploitation of children that is mentally, physically, socially or morally dangerous and harmful; and/or interferes with their ability to attend school.

**Connected/unconnected colleagues**  
Marshall's connected colleagues use electronic devices (phones, laptops) at work to access online systems, including our training platform. Unconnected colleagues do not have personal devices to log onto our IT system.

**Human rights and environmental due diligence (HREDD)** are measures that businesses take to identify, prevent, monitor and mitigate any negative impacts that their activities, or those of suppliers, have on people and communities.

**International Labour Organization (ILO)** is the United Nations (UN) agency that sets international labour standards to advance social and economic justice.

**Modern slavery** is the severe exploitation of another person for commercial or personal gain. It takes many forms: in a business context, it is usually described as **forced labour** and is often triggered through **debt bondage** or **bonded labour**. In this situation, individuals and sometimes families, are trapped in an endless cycle of debt to their employer.

**PPE** personal protective equipment is equipment worn to minimise risk of workplace injury or illness.

**Real Living Wage** is an independently calculated rate based on the cost of living and is paid voluntarily by employers. Marshall's has been an accredited Living Wage employer (from the Living Wage Foundation) since 2014.

**Social audits** assess the human rights and environmental risks of a business.

**Second party audits** are social audits that Marshall's colleagues (either in procurement or business and human rights departments) have carried out on physical visits. **Third party audits** are when an independent organisation, such as an ethical auditor or consultant, conducts an audit on our behalf. **Virtual audits** are conducted with a supplier through an online interview or phone call.

**Solar Stewardship Initiative (SSI)** a joint initiative by Solar Power Europe and SolarEnergy UK to establish internationally recognised sustainability standards for the solar sector.

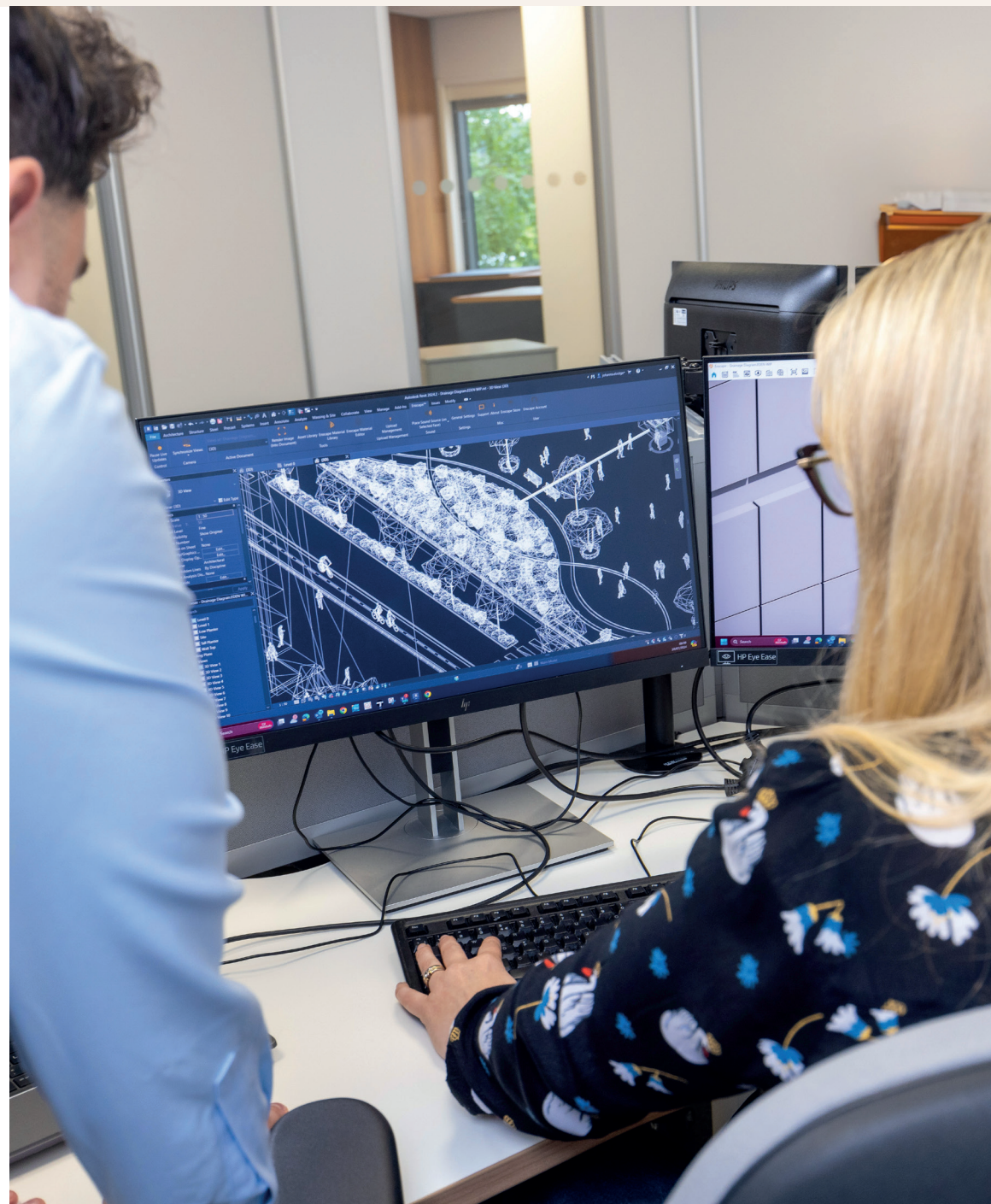
**Supply chain** is the network of companies and individuals that are responsible for creating a product, from raw materials to delivery.

**Sustainable Development Goals (SDGs)** were adopted by the United Nations in 2015 as a universal call to action to end poverty and protect the planet. There are 17 SDGs.

**Tiers** supply chains have **tiers**: direct suppliers with whom we have a business relationship are **tier 1**, their direct suppliers are **tier 2**. Marshall's often carries out **mapping** to identify suppliers at each level of the supply chain. This is part of our drive towards **supply chain transparency**.

**UN Global Compact (UNGC)** is the world's largest corporate sustainability initiative, calling on companies to align with universal principles on human rights, labour, environment and anti-corruption. Marshall's is a member of UNGC UK.

**XertifiX** is a European-based NGO (Non-Governmental Organisation) which runs an international audit and certification scheme to raise standards in the Asian stone sector.





## Our structure, operations and supply chains

# One: Our structure, operations and supply chains





## Our structure, operations and supply chains

### Our operations

Marshalls Group is a UK-based manufacturer of landscape, building and roofing products. The Group includes Marley-branded products, roofing contractor Marley Contract Services, and Viridian Solar, which provides roof-integrated solar panels.

All Marshalls and Marley manufacturing sites are located in the UK. Viridian Solar is also based in the UK, but its manufacturing supply chain is in China. We currently have no overseas locations.

### Our locations are

# 45

Manufacturing sites and quarries

# 9

Offices, administrative sales locations and distribution centres



### Our people

On 31 December 2024, a total of 2,435 people were directly employed across the Marshalls Group. We have been accredited as a real living wage employer by the Living Wage Foundation since 2014. This voluntary scheme ensures that our colleagues, and those of our in-scope contractors and service providers in the UK, receive a payment that is based on sustainable living costs, above minimum wage.

### Our supply chains

- 88% of spend is in the UK
- Our top trading countries by spend are China, India, Germany and Finland. See section three for more details
- Major procurement categories for overseas spend are natural stone, timber, ceramics and solar panels



### Contractors at Marshalls locations

As an accredited Living Wage Foundation employer we annually review all our UK service providers that meet the criteria, to ensure that they are paying real living wage to employees working on Marshalls sites.

This includes monitoring and liaising with cleaning agencies, facilities management companies, vehicle maintenance and plant hire contractors.

When we find instances where wages have failed to meet the threshold, we work with suppliers to remedy the situation. In 2024 we introduced semi-automated processes to our supplier platform, to help with the monitoring and management of in-scope\* contractors. We also made seven interventions on real living wage.

\*Our service providers are in scope of paying the real living wage if they supply workers to Marshalls sites for more than two hours a week, for eight or more consecutive weeks in a year.



## Our structure, operations and supply chains

### Agency workers and migrant labour

Temporary labour presents a higher risk of exploitation, compared to permanent staff. However, our use of temporary labour across the Marshall's Group is relatively low due to location requirements:

- We operate to high safety, quality and technical standards, and our manufacturing process demands skills and competencies that cannot be easily filled by casual labour
- We don't experience the same sudden fluctuations in demand as in agriculture, textiles or food production
- Our policy, where possible, is to convert temporary workers to permanent employment

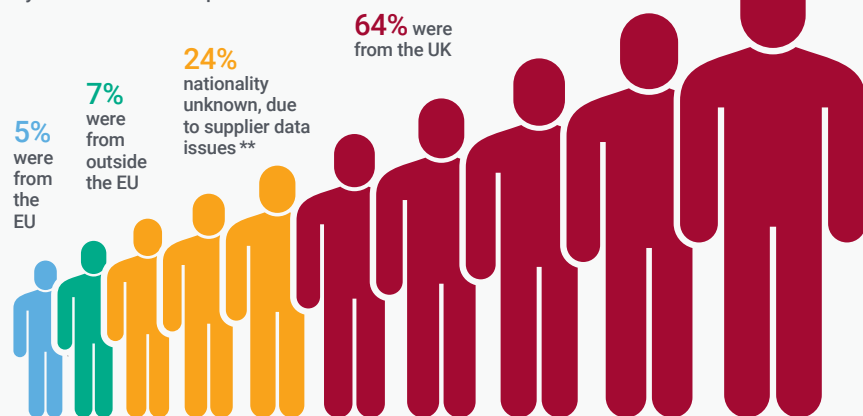
Of the labour providers supplying to our locations, approximately 85% by spend were vetted and monitored via a third-party platform, operated by Magnit. This served to better manage ethical risk and ensure wages met or exceeded our real living wage requirements. We reduced the number of agencies on our platform by 68% in 2024.

In 2024, hours worked by individuals supplied to Marshall's locations via agencies on the Magnit platform accounted for 2.2% of all hours worked in those locations.\*

### Temporary migrant labour

Migrant workers are at higher risk of exploitation within the temporary labour category. We therefore hold our labour providers to high ethical standards when screening and taking on individuals from overseas, requiring they have been through the correct right to work checks, and have not been made vulnerable through recruitment or visa issues.

Of the 339 temporary workers engaged by the Marshall's Group in 2024:



\* This does not apply to Marly or Viridian. \*\* We are working with our agencies to improve data collection next year.





## Our policies in relation to modern slavery and human trafficking

# Two: Our policies in relation to modern slavery and human trafficking





## Our policies in relation to modern slavery and human trafficking

# Policies

### Introduction

Marshall's colleagues are, under the terms of their employment, expected to follow all laws of the countries in which they operate and all of the organisation's policies, including the Code of Conduct. Colleagues that violate laws or policies are subject to disciplinary action, which in certain cases, can lead to dismissal.

Our onboarding process requires suppliers to confirm that they will comply with our Code of Conduct.\*

We reserve the right, through our standard terms of purchase, to terminate a supplier relationship for any non-compliances that are not addressed in a timely manner.

**Several of our policies and codes underpin our commitment to the anti-slavery agenda. They are annually reviewed by the Board and signed off by our Chief Executive.**



#### Human Rights and Anti-Slavery

Incorporates anti-slavery considerations into a wider human rights context



#### Serious Concerns

Provides information and guidance for colleagues and other stakeholders, including how to raise concerns



#### Children's Rights

States our respect and support for children's rights and the protection of young people in alignment with the United Nations Convention on the Rights of the Child (UN CRC)



#### Corporate Responsibility and Social Value

Shows how we make a positive and sustainable contribution to the communities where we do business



#### Code of Conduct

Sets our expectations for the ethical behaviour of colleagues and suppliers across the Marshall's Group, and explains how to raise concerns, including through our independent whistleblowing hotline Safecall



#### Anti-bribery Code

Reinforces our anti-corruption message

\* This currently applies to all suppliers onboarded by Marshall's and roughly 82% of Marley's supply chain by value. We are continuing to work to integrate our processes across the Group.

## Our processes for identifying and managing risk

# Three: Our processes for identifying and managing risk





## Our processes for identifying and managing risk

### Governance

Our reporting structures ensure that human rights considerations remain at the heart of company operations.

Anti-slavery strategy is managed by our Business and Human Rights (BHR) Lead, who works closely with colleagues in procurement, communications and learning and development. She is part of the cross-departmental ESG Delivery Team, which collaborates on rolling out ESG strategy and initiatives across the Group, and is overseen by the ESG Steering Committee.

After internal reorganisation in 2024, the BHR Lead now reports directly to the Chief Legal Officer and Company Secretary, who also sponsors ESG at Board and is a member of the Group's Executive Leadership team.

The ESG Steering Committee met six times in 2024 to monitor the Team's objectives, goals, strategies and measures (OGSM) and ensure that the ESG strategy aligned with Marshall's wider objectives. Members of the Steering Committee include: Marshall's Chief Executive, Chief Financial Officer (CFO), Chief Commercial Officer (CCO), Chief Legal Officer and Company Secretary, Marley's Marketing and Digital Director and Viridian Solar's CEO.

Overall strategy for ESG is overseen by the ESG Board Committee, which met three times in 2024.

### Risk strategy

Our strategy for identifying and managing human rights risk in our supply chains is jointly managed through the procurement team and BHR Lead. We take a risk-based approach according to location, sector and supplier history.

At onboarding, suppliers must answer screening questions. Those identified to be at higher risk are diverted to more detailed questionnaires or bespoke assessments. The BHR Lead works closely with the procurement team and other departments when new at-risk suppliers are being considered, either overseas or in the UK.

Ongoing risk is monitored and managed through a combination of desk-based risk analysis, supplier interviews and visits, training and independent audits.

We also periodically consult with local experts and our network of governmental, academic and NGO contacts to provide additional insights and knowledge.

In our operations, we have modern slavery awareness training and also an independently managed, confidential employee hotline for reporting concerns.

Details of our risk management strategy are discussed and reviewed with the Chief Legal Officer and Company Secretary, the ESG Steering Committee, and submitted to the ESG Board and the Audit Committee. Our external auditors also meet with us annually to assess how we are managing ethical risk.

### Our due diligence process





## Our processes for identifying and managing risk

### Existing and new suppliers

Businesses must meet a minimum set of ethical criteria before Marshall's will trade with them. This includes having an up-to-date modern slavery policy, or a statement if they are in scope of the UK Modern Slavery Act (2015).

This requirement now covers 82% of Marley's supply chain and includes major items such as timber, PPE, aggregates and packaging.

We introduced a digital platform for managing first tier suppliers in 2021, which we continue to develop. Businesses receive a risk score as part of the onboarding process and in 2024 we introduced a red, amber, green traffic light system for managing supplier compliance. This helps us monitor whether critical documentation, such as modern slavery statements and policies are up to date.

Approximately 85% (by spend) of Marshall's existing tier one suppliers have now moved to the platform, and all new suppliers will join it automatically\*. As suppliers join the platform, they must provide appropriate assurances regarding any risk of modern slavery in their businesses.

\*This does not currently include Marley or Viridian Solar.



### Onboarding overseas supply chain and high-risk suppliers

During onboarding processes, our internal scoring system flags suppliers that are considered to have a moderate to substantial risk, including those in higher risk geographies or sectors. These suppliers are required to undergo a deeper assessment, in the form of tailored questionnaires. In certain cases, the BHR Lead is consulted, and further ethical interviews or supplier visits are undertaken before a new supplier can be approved.

For the past five years, higher risk suppliers have been directed to a special set of questions through the Slavery and Trafficking Risk Template (STRT), developed by the Social Responsibility Alliance.

In 2024, we started to refine and streamline our approach. While the questions retain the spirit of the STRT, they have been revised and simplified to make them more relevant to our supplier base. We will be integrating them into our standard digitised onboarding processes in 2025.

We hope that this will improve our data collection, enable more efficient analysis of supplier gaps and capabilities and help us identify where more support or interventions are needed.



## Our processes for identifying and managing risk

### Bespoke risk assessments for higher risk categories

We continue to use third party analytical tools from Verisk Maplecroft to analyse ethical risks in our UK and international supply chains.

To build a global picture, we annually measure and monitor human rights risks in every country in which our tier one suppliers are based. At supplier level, we also carry out detailed desk analysis of our higher risk locations, plotting factories and quarries against local, national and international trends on issues such as modern slavery, child labour, working hours, health and safety and wage violations.

As well as helping us assess prospective new suppliers or unknown territories, this approach helps us decide where to focus our resources, how to work with others to eliminate modern slavery and, in extreme cases, when to consider exiting a market.

For example, in 2024 we carried out a study of risk in our ceramics supply chain and this involved comparing and contrasting working conditions in four countries. By mapping out the geo coordinates of individual factories to give precise regional readings, we were able to understand critical trends such as risk to migrant labour, risk of underage workers entering the supply chain, and strength of local labour inspectorates. The resulting analysis and recommendations are influencing our longer-term procurement and due diligence strategies.



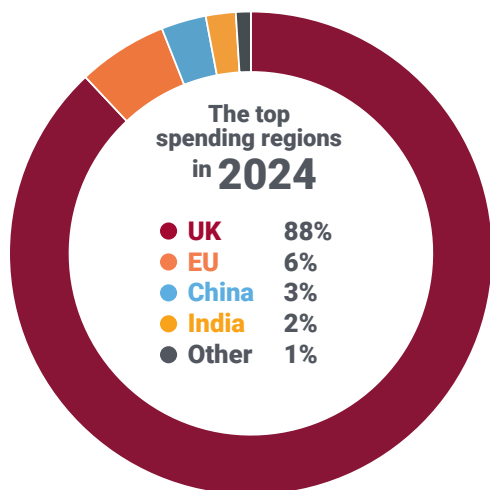


## Our processes for identifying and managing risk

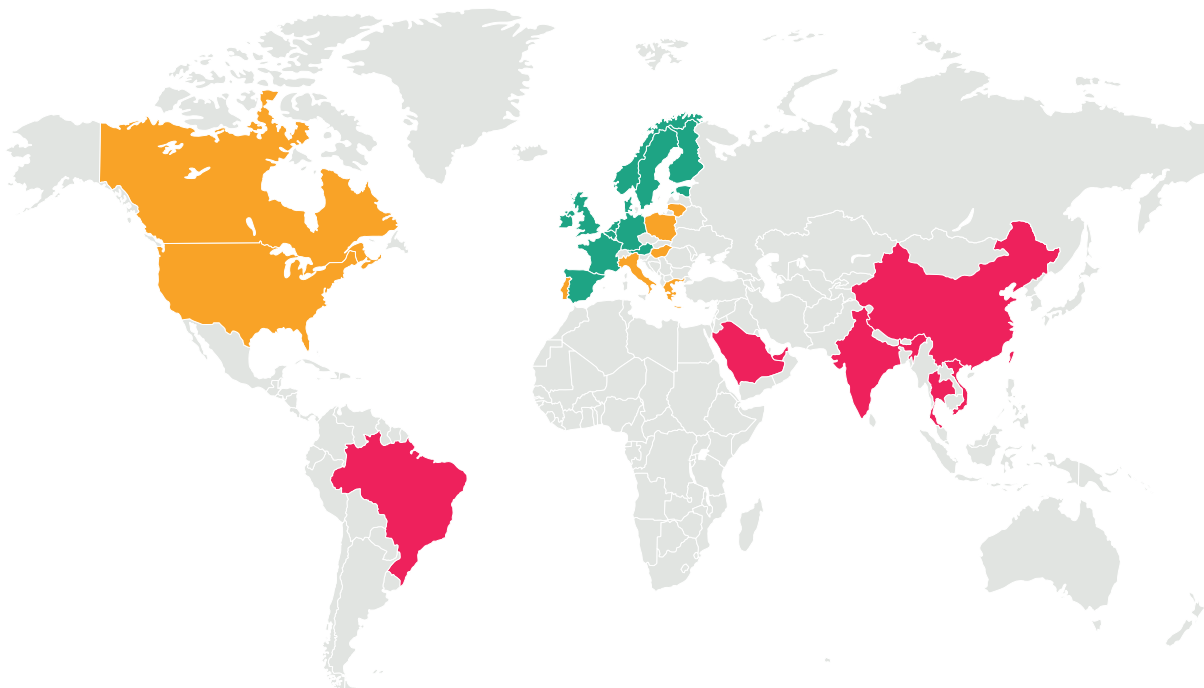
### 2024 risk report

In September 2024 we completed desk-based analysis of human rights risks in all countries in which our tier one (direct) suppliers are based. The findings were shared with the ESG Steering Committee and formed the basis of recommendations on future strategy.

Taking 1 July 2024 as our measuring point, we mapped spend in all overseas jurisdictions over the previous 12 months, and analysed how ethical risk had changed in each country over the previous two years.



### Our supply chain



#### LOW RISK

AUSTRIA
BELGIUM
DENMARK
ESTONIA
FINLAND
FRANCE
GERMANY
IRELAND
NETHERLANDS
NORWAY
SPAIN
SWEDEN
UNITED KINGDOM

#### MEDIUM RISK

CANADA
GREECE
HUNGARY
ITALY
LITHUANIA
POLAND
PORTUGAL
SINGAPORE
TAIWAN
USA

#### HIGH RISK

BRAZIL
CHINA
INDIA
SAUDI ARABIA
THAILAND
UAE
VIETNAM

### Summary of findings

- The majority of our spend was with UK suppliers, accounting for 88% of purchasing across the Marshall's Group
- Our overseas supply chain of tier one suppliers spans 33 countries
- The countries where we spent the most were, from highest to lowest: China, India, Germany, Finland.
- We analysed 30 countries where spend was above £10,000
- There are seven countries in our supply chain that present higher risks of modern slavery and human trafficking. They accounted for less than 6% of spend across the Group
- The sectors at highest risk were solar, natural stone and ceramics
- Human rights risks identified in our trading countries are working hours and payment violations; poor health and safety; forced labour, prison labour, child labour



## Our processes for identifying and managing risk



### Progress in 2024

- Increased the percentage of suppliers on our procurement platform to 88% by spend
- Introduced a red, amber, green traffic light system onto our digital platform for managing supplier compliance, including tracking whether they have policies or modern slavery statements
- Produced an internal risk report for the ESG Steering Committee, analysing changing working conditions in 30 countries in our supply chain
- Started the process to streamline and integrate our questionnaires for higher risk businesses into our supplier platform



Our processes for due diligence on parts of supply chain most affected

# Four: Our processes for due diligence on parts of supply chain most affected





## Our processes for due diligence on parts of supply chain most affected

### Salient risks

We have identified the most salient risks in our overseas supply chains as:

- **Excessive working hours**
- **Health and safety violations**
- **Forced and bonded labour**
- **Child labour**
- **Prison labour**

### Addressing parts of the supply chain most at risk of human rights violations

Working with regions and industries at highest risk of labour rights violations was our main priority for 2024. We continued to focus on suppliers in China and India, our top international sourcing countries. Together, they represented 44% of overseas supplier spend and 93% of spend in high-risk jurisdictions, while still accounting for only 5% of purchases across the Marshall's Group.

Our major areas of activity were in natural stone and solar panels in China, and natural stone in India. We will start auditing ceramics suppliers in the Gulf region in the first half of 2025.

We also consulted with an ethical labour expert on challenges faced by small and medium (SME) suppliers in our UK supply chain. We will be building this learning into SME supplier engagement initiatives in the coming year (see section six). Common themes across our projects included commitments to:

- Identify suppliers at all levels of our higher risk supply chains, tracing back to raw materials where possible
- Commission more independent audits of suppliers
- Work towards external verification, to improve standards across the materials supply chain journey

## Case Study

### Natural stone

In 2024 we reviewed our due diligence strategy for natural stone. This resulted in separate projects in China and India. In each jurisdiction, contrasting approaches were taken to better address the risk at a local level. Decisions were based on advice from locally based ethical consultants and our own research.

#### China

In 2024 we became the first UK member of European certification and auditing scheme XertifiX, starting a pilot for factories and quarries in our Chinese natural stone supply chain. This followed a supplier location mapping exercise carried out in 2022 and 2023.

#### We chose XertifiX because it:

- Tracks products through to every level of the supply chain, from quarry to export
- Introduces incremental social and environmental improvement programmes for each participating location
- Uses local human rights experts, with experience in the natural stone sector to carry out audits
- Introduces unannounced or semi-announced audits, once suppliers have gone through initial assessments
- Aligns with EU legislation on human rights due diligence

Our pilot with XertifiX started in November 2024, and seven audits have been completed, covering four quarries and three factories. Recommendations and follow up visits will be made and XertifiX will visit to check progress of each site at least annually. Participating locations will be part of a five-year improvement programme.

We will continue our audit programme in 2025 with the aim of covering all our major stone lines in China by the end of the year. We also plan to engage with suppliers to educate them on the mutual benefits of XertifiX, and support them on the journey of raising standards.

#### India

Our ethical work in our Indian supply chain dates back to 2006 but was disrupted due to the coronavirus pandemic and subsequent challenging market conditions.

In 2024 we made two trips to Rajasthan in North India (February and December 2024) to carry out detailed baseline assessments of existing and prospective suppliers. Our goal was to understand how recent social and economic pressures were further impacting workers in our supply chain and the sector as a whole.

The Marshall's team was accompanied by an India-based ethical and social auditing expert. She carried out worker and management interviews and assessed conditions such as employment contracts, working hours, payment systems, occupational health and safety, accommodation and risk of child labour.

Our visits confirmed that informal working practices and complex supply chains, combined with lack of enforcement from the Indian and Rajasthan governments, continue to heighten vulnerability for workers in the sector. Marshall's sets clear expectations with suppliers, but conditions are more precarious post Covid and this continues to be a challenging region in which to operate.

We raised our concerns with our commercial partner and have been working with ethical consultants to review and strengthen our due diligence strategy. Our enhanced process will be implemented in 2025.



## Our processes for due diligence on parts of supply chain most affected

### Case Study

#### Transparency and ethics in solar

As our solar supply chain is almost wholly reliant on China, we've been taking a multifaceted approach which includes regular visits and audits, sourcing agreements and traceability initiatives.

#### Supply chain mapping

Metallurgical grade polysilicon is the main component of solar panels. Derived from mined silica, it goes through a series of processing and manufacturing stages before it is converted to cells then installed into the finished product.

From our research we know that the ethical risks in the polysilicon supply chains are highest upstream, at raw materials extraction and processing stage. Therefore, tracing the polysilicon journey back to source is an ongoing priority.

We identified the first five tiers of our supply chain (from polysilicon processing to cell and panel production) in 2023. Our visits in 2024 helped us extend our knowledge to tiers six and seven (raw materials processing). We believe that we are one step away from the quarry stage, where silica is mined. We will continue to map upstream in 2025.

#### Supplier agreements

Supplier agreements, stipulating sourcing locations, were embedded into every purchase order in 2023, covering tiers one to five. We worked towards expanding these agreements to cover tier six in 2024. The new requirements will be implemented in early 2025.

#### Supplier visits and traceability initiative

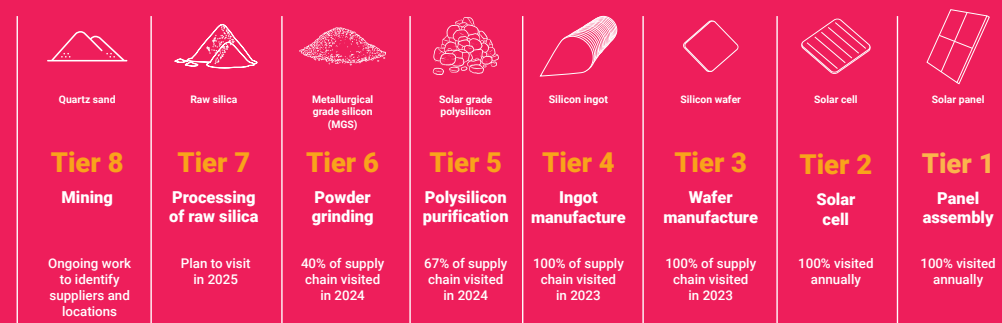
In October 2024, Viridian Solar's Chief Technical Officer and Marshall's BHR Lead visited five suppliers to ascertain our supply chain's readiness for independently verified ESG and traceability standards. They were accompanied by an independent ethical supply chain expert, and visited manufacturing facilities at tiers one, two, five six and seven. Ethical interviews were also conducted as part of the visit.

#### Social audits

In 2024, Viridian Solar continued its audit roll out of cell and panel manufacturers in the polysilicon supply chain (tiers one and two). By early 2025, we intend to have completed audits in the top two tiers and plan to cover other components.




### The supply chain





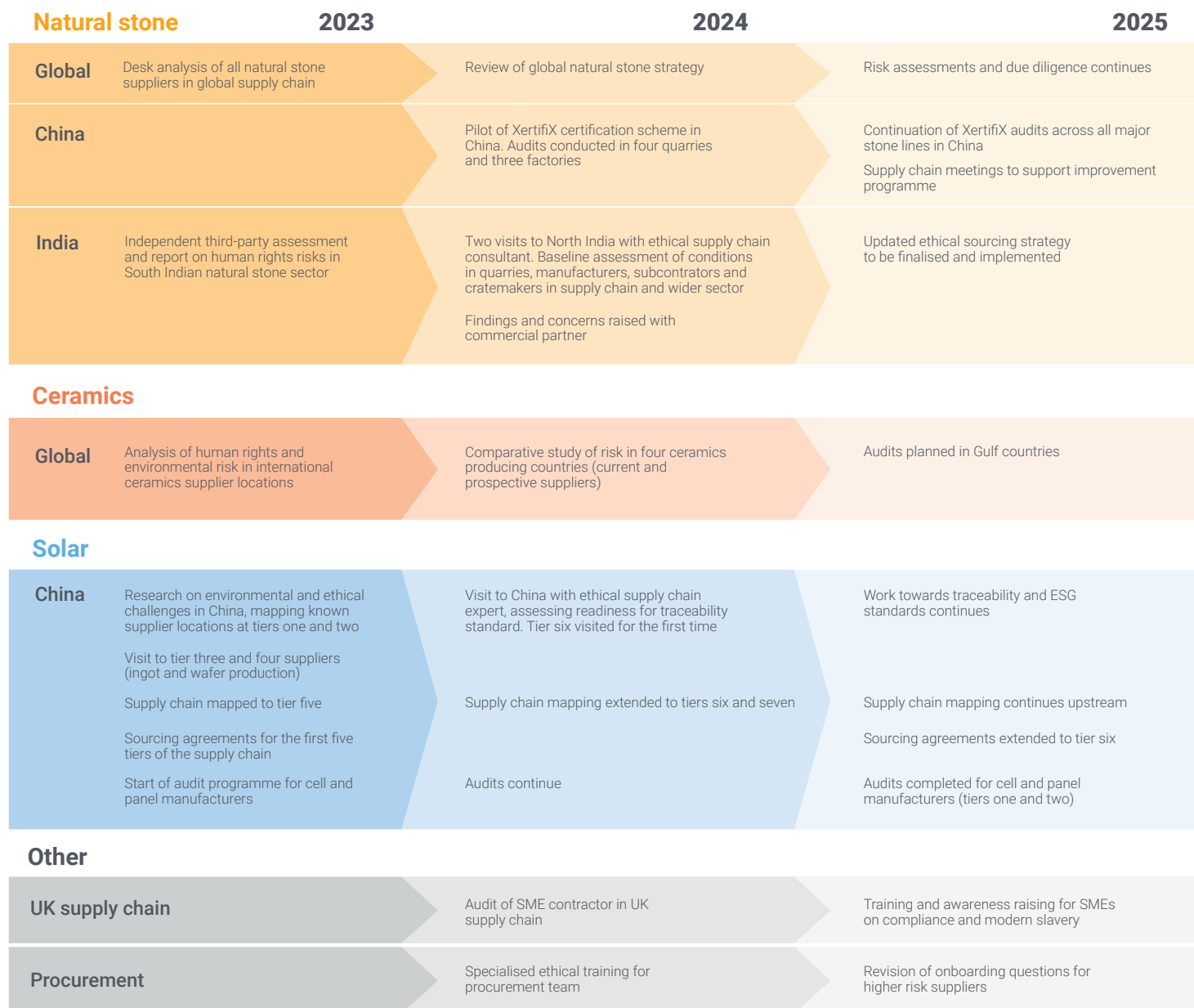
## Measuring our effectiveness

# Five: Measuring our effectiveness





## Measuring our effectiveness



## Collaboration and stakeholder engagement in 2024

- Marshall's continued to engage with the UN Global Compact Network UK's (UNGC UK) modern slavery working group. This gave us the opportunity to exchange information with likeminded businesses. We also used our membership to go through a peer review of our 2023 Modern Slavery Statement.
- Marshall's BHR Lead was a guest speaker at a customer's modern slavery working group meeting. She gave a presentation on ethical labour challenges in the UK construction sector and international supply chains and took part in the collaborative discussion.
- Marshall's attended two child labour events in 2024. The first was a roundtable organised by the UN Global Compact UK. The second was an online seminar organised by the International Labour Organization's (ILO) Child Labour Platform.
- Viridian Solar continued its membership of the Solar Stewardship Initiative (SSI). In 2024, Viridian's CTO was part of the SSI's traceability working group, helping to developing best practice for the sector.
- Marshall's presented to the Scotland Against Modern Slavery (SAMS) industry working group.
- Marshall's was featured in the UN Global Compact SDG Showcase *How companies are contributing to achieving Agenda 2030* for its contributions to SDG targets 8.7 and 8.8.



## Training

# Six: Training





## Training

Training is essential for raising awareness and ensuring that our colleagues, associates and suppliers are confident and equipped to recognise any signs of modern slavery, exploitation or vulnerability in their daily operations or supply chains.

This is carried out online via the Marshall's Learning Zone, and face to face. We regularly review our online tools to ensure that they are suitable and up to date with legislation. All connected colleagues (those that have a company email address and access to a desktop computer or laptop), receive induction awareness training on modern slavery, our Code of Conduct and anti-bribery training when they join the business, and undertake annual refresher modules in subsequent years.

To reach unconnected colleagues (those who do not have easy access to a computer as part of their job), online activity is periodically bolstered by education workshops, face-to-face meetings, newsletters, roadshows, social media and communications activity. We provide specialised training for colleagues in influential departments, such as procurement, to make them aware of the pivotal role that they can play in monitoring and upholding ethical standards in our supply chains.

Other aspects of our drive to raise and maintain awareness internally include: high level briefings to directors and the Board; briefings to marketing and sales teams, works and facilities managers, as well as face-to-face meetings with key individuals.

### Progress in 2024

In 2024 we carried out annual online anti-slavery awareness training for connected colleagues. This was extended to connected staff in Marley for the first time.

We also continued to roll out our Code of Conduct training to major suppliers. By the end of the year, 314 suppliers had watched the training and signed the code.



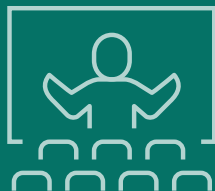
### Training for procurement and UK supply chain

In July 2024, Marshall's commissioned an external audit of a UK-based SME contractor that supplies to several manufacturing locations. Our goal was to assess the supplier's understanding of ethical and modern slavery risks and its capability for meeting them. Checks included right to work, recruitment and onboarding processes, record keeping and policies.

While the audit did not find any major areas of concern, it highlighted the challenges that smaller businesses face in meeting compliance.

We used the learning from this audit as part of an awayday training session for the Marshall's procurement team in October 2024. The ethical consultant who carried out the audit was invited back as a guest speaker. He gave a practical presentation on how to assess and manage risk, through checking wage slips and other records. The BHR Lead also presented on global supply chain risks.

In 2025 we will be continuing our work with UK supply chain, using our audit findings to develop training and engagement for UK-based SME suppliers.



### Training for customers

In September 2024, the BHR Lead was the first speaker in Balfour Beatty's *How to: Build Sustainable Futures* knowledge series. She presented an hour-long online awareness-raising session on modern slavery to an audience 300 Balfour Beatty employees and invited guests.

The presentation discussed how business practice can affect worker vulnerability both on site and in supply chains. The session included a real-life case study of a modern slavery gang that infiltrated UK construction sites over nearly a decade, and the learnings arising from the case.





