

MARSHALL OF CAMBRIDGE (HOLDINGS) LIMITED

Slavery and Human Trafficking Statement

The following policy statement should be adopted and followed by all companies and employees within the Group.

The Marshall Group, although headquartered in Cambridge, operates globally in a number of distinct market sectors. The Group has built a reputation over 100 years by adhering to core family values which are enshrined in the Group's 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.

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 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.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. 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.

This policy applies to all persons working for us 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 has overall responsibility for the adoption of this 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 this Group Policy.

It will be the responsibility of each 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 company. They have the primary responsibility for implementing this 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 this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The 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. You are required to avoid any activity that might lead to, or suggest, a breach of this policy and you are encouraged to raise

concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. You must notify the Group Company Secretary as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Group Company Secretary or report it in accordance with our Whistleblowing Policy as soon as possible. If you 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, raise it with your manager in the first instance.

The Group encourages openness and will support anyone who raises genuine concerns in good faith under this 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group Company Secretary immediately.

Communication and awareness of this policy

Training on this 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 must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.



R D Marshall
Group Chief Executive
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