

## Modern Slavery Policy

**Modern slavery** is a crime and a violation of fundamental human rights and Marshall Aerospace and Defence Group has a zero-tolerance approach. We are committed to acting ethically and with integrity in all our business dealings and relationships and to ensure **modern slavery** is not taking place anywhere in our business, or in any of our supply chains.

### Aims of this policy

This policy supports our commitment to eliminating the risk of modern slavery occurring within Marshall Aerospace and Defence Group, infiltrating our supply chains or any other business relationship.

It applies to all persons working for or on behalf of Marshall Aerospace and Defence Group in any capacity, including employees, directors, agency workers, contractors, consultants, volunteers, interns, apprentices and any other third-party representative.

We also expect high standards from all our subcontractors, suppliers and other business partners and have made this a contractual term in our supplier agreements.

This policy underpins and informs any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015.

### What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem of which the Modern Slavery Act covers four key criminal activities:

1. Slavery: where ownership is exercised over an individual
2. Servitude: involves the obligation to provide service imposed by coercion
3. Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
4. Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate but are not specifically referenced in the Modern Slavery Act, include child labour.

All forms of modern slavery have in common the denial of a person's freedom by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships. If we feel there is a potential risk, risk assessments will be carried out accordingly.

## **Our suppliers**

Marshall Aerospace and Defence Group maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery, we may request on-site audits to include a review of working conditions. Our modern slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradict this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.
6. Collate our approach into an overarching policy document.

## **Breaches of this policy**

Employees, directors or officers of Marshall Aerospace and Defence Company who breach this policy may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Human Resources Department or the Communications Department at Marshall Aerospace and Defence Company.

## **Status of this policy**


This modern slavery policy will be reviewed by the Company's Executive Team on an annual basis.

### How do I report a breach to this policy?

If you suspect an individual or group has breached this policy, please inform the Communications department by contacting [internal.comms@marshalladg.com](mailto:internal.comms@marshalladg.com) and the relevant investigations will then take place.

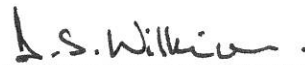
### Governance

This policy was approved by the Marshall Board of Directors and is made in accordance with Section 54(1) of the Modern Slavery Act 2015.



Signed by

Alistair McPhee  
Chief Executive Officer  
April 2019



Signed by

Daney Wilkinson  
HR Director  
April 2019