

Step	Risk / Issue	Action Point	Objective	When	Who
1.1. Formulating a policy	We have, and have had for a considerable time, a Human Rights Policy, Children's Rights & Business Principles Policy and a annual Modern Slavery Statement. We are a UNGC participant and have made public commitments to the Guiding Principles. Our work is underpinned by third party audit and assurance. We have had BRE Ethical Labour Sourcing Standard 6002 certification for 5 years continuously.	Annual Modern Slavery Statement and review of human rights policies.	Uphold and advance international business & human rights standards	continuously	Business & Human Rights Director.
1.2. Integrating international RBC into management systems	We have clear robust human rights due diligence systems and processes which are described fully in our annual Modern Slavery Risk Assessment Report. Marshall's has undertaken, for the fifth year running and will do so annually, extensive modern slavery risk mapping for all countries where it has business operations, sources goods or has supply chains. Whilst we utilise this information as part of our due diligence process for new goods, materials or services, we also put this alongside internal data and information to help us to better understand modern slavery and human trafficking, risks, direct our efforts and resources most effectively, develop engagement programmes with key suppliers in high risk environments and to make plans with our anti-slavery partners regarding remediation for victims. It helps us to clearly identify areas of risk, set clear priorities and to have effective dialogues with a range of key actors regarding the wider systemic change which is necessary. Marshall's publishes this information to be transparent about the countries from which it sources and also so that it might be easily referenced by others to help identify modern slavery and human trafficking risks.	Enhanced supply chain mapping utilising Traffik Analysis Hub.	Ensure strong HRDD operational systems and processes which are transparent, compliant, robust and defensible.	continuously	Business & Human Rights Director, Natural Stone Commercial Team, Procurement Team.
2.1. Overview of the supply chains	To ensure that we have a clear understanding of our supply chain we undertake ongoing risk analysis, enhanced supply chain mapping and will increase the use of technology to monitor supply chain conditions. We also work with UN agencies to research, monitor and drive systemic change.	Roll out of Everyone's Business live monitoring app. Roll out of Safecall whistle blowing hot line. Roll out of ETI Base Code Training film for suppliers in high risk geographies.	Uphold and advance international business & human rights standards Ensure strong HRDD operational systems and processes which are transparent, compliant, robust and defensible.	continuously	Business & Human Rights Team.
2.2. Mapping risks	We undertake comprehensive risk mapping: annual country risk mapping, enhances supply chain mapping, etc. Please see our attached Modern Slavery Risk Analysis Report. In 2021 we also commissioned an independent third party to look at both our business operations and supply chains in relation to the Children's Rights & Business Principles Audit. We are working to implement the recommendations which resulted.	Roll out of Everyone's Business live monitoring app. Roll out of Safecall whistle blowing hot line. Roll out of ETI Base Code Training film for suppliers in high risk geographies.	Ensure strong HRDD operational systems and processes which are transparent, compliant, robust and defensible.	continuously	Business & Human Rights Director
2.3. Prioritising risks	As a result of our extensive and ongoing risk analysis activity we are clear on our priority areas. Specifically we will be continuing the implement our International Year for the Elimination of Child Labour Pledge.	Continue to implement our IYECL Pledge: and specifically drive development of a Guiding Framework for the procurement of natural stone in Rajasthan.	Uphold and advance international business & human rights standards	continuously	Business & Human Rights Team, Natural Stone Team, Communications Team.
3. Addressing risks	Country	Risk	Uphold and advance international business & human rights standards	continuously	Business & Human Rights Director
	India	Child Labour			
	India	Bonded Labour			
	Vietnam	Prison Labour			
4. Evaluation	Evaluation of our progress is undertaken by third parties, including UN agencies. It is also addressed through our BRE Ethical Labour Sourcing Standard annual verification.	BRE ELS 6002	Ensure strong HRDD operational systems and processes which are transparent, compliant, robust and defensible.	continuously	Business & Human Rights Director
5. Reporting	We report on our progress in our annual Modern Slavery Statement, as required by UK law. We also report in our annual UNGC Communication on Progress Report. In addition our annual Modern Slavery Risk Analysis and End Modern Slavery Report also hold details of our progress, together with instances of modern slavery identified and the steps taken to remediate. In addition we report any instances of modern slavery and human trafficking transparently to the appropriate authorities and agencies, including the IASC, GLAA, law enforcement.	Publication of our MSA, COP, Modern Slavery Risk Analysis and End Modern Slavery Report.		continuously	Business & Human Rights Director
6. Complaints and disputes	We are in the process of rolling out Safecall, a whistle blowing hotline, across our high risk natural stone supply chains: India, China, Vietnam, Brazil, and also Portugal. Complaints are dealt with through a documented process involving senior business leaders as appropriate.	Full roll out of Safecall across key supply chains.	Uphold and advance international business & human rights standards	as they are raised	Legal, HR and Human Rights.