



SLAVERY AND HUMAN TRAFFICKING STATEMENT

For the financial year ending 31 December 2018

Introduction

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.

Marshall Thermo King Ltd (*trading as Marshall Fleet Solutions*) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing appropriate and effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in our supply chains.

The Modern Slavery Act 2015 (the "Act") introduced changes in UK law focused on increasing transparency in supply chains. Specifically, large businesses are required to disclose the steps they have taken to ensure their business and supply chains are free from modern slavery. This statement sets out the steps we have and are taking to ensure that slavery and human trafficking are not taking place in any of our supply chains or businesses and is made pursuant to section 54(1) of the Act. This statement applies to Marshall Thermo King Ltd.

Company Structure and Supply Chains

The Company's principal activities are the sale, distribution, and service of refrigeration units for commercial vehicles, the service of tail lift equipment, and the provision of contract maintenance and fleet management products. All the Company's operations are based in the United Kingdom and the Company employs over 320 individuals across its business.

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. In addition, the Company has commercial arrangements with other suppliers to support the operational side of the business from fuel supplies through to property costs. The Company also engages with other providers of goods and ancillary services (including legal, recruitment, stationery etc).

Marshall Thermo King Ltd,

- Complies with employment laws within the UK.
- Complies with national and international laws governing supply chain management.

Marshall Thermo King Ltd is part of Marshall of Cambridge (Holdings) Ltd.

Policies on Modern Slavery

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have adopted a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Training on the policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process. All managers are required to complete an e-learning module regarding how to prevent Modern Slavery within our supply chain.

The prevention, detection and reporting of modern slavery in any part of our supply chains is the responsibility of all those working for us. Everyone is required to avoid any activity that might lead to, or suggest, a breach of



the policy and they are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

If they 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, they are able to raise it with their manager in the first instance. Employees are also able to notify the Group Company Secretary if they know of any modern slavery incident (actual or potential). Furthermore, employees are able to access and report any concerns by accessing the Marshall Fleet Solutions whistle blowing policy, available on the intranet ("The Box").

Due Diligence Processes

As part of our initiative to identify and mitigate risk, we continue to put in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.
- Protect employees. Internally we have a formal "Employee Grievance" procedure in place, managed by Human Resources

Further steps:

- Marshall Thermo King Ltd have identified a need to implement procedures for the appointment of preferred suppliers with the objective of reducing supplier risk as it relates to the prevention of modern slavery, promoting quality assurance and reasonable and sustainable cost mitigation. This project started on the 7 May 2019. It is envisaged that a preferred supplier list will be in place by November 2020.
- Marshall Thermo King Ltd have an online system for checking the "good standing" of customers. The good standing of suppliers will be reviewed via this system with a view to implementing an ongoing monitoring exercise once due diligence exercises have been completed.

Risk assessment

We have zero tolerance to slavery and human trafficking. We continue to review our supply chain management process to ensure all those in our supply chain and contractors comply with our values and their legal obligations.

- In general, this sector is not considered to be high risk. Furthermore, independent sub-contractors are highly skilled and contracted directly by Marshall Thermo King Ltd, failing which services are offered by employees.
- The modern slavery risk assessment is part of the wider Group approach to risk management.

Marshall Thermo King Ltd are members of the British Frozen Food Federation (BFFF), Food Storage and Distribution Federation (FSDF) and Safecontractor.



- Membership provides the opportunity to maintain awareness at both commercial and legislative levels.

Measuring effectiveness

We have not identified any instances or indications that either slavery or human trafficking occurs in our supply chain. As such, we have not considered it necessary to adopt any formal performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains. We intend to continue to keep this under review.

- We do not include unrealistic KPI's in our supplier agreement which may render a supply chain vulnerable to slavery.
- As an organisation we promote prompt payment mechanisms, where work has been completed.

Training for Staff

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

We also require staff to undertake separate online training which covers the Modern Slavery Act 2015 directly.

Further Steps

As set out in above, the Company continues to take a variety of further steps to ensure that neither slavery nor human trafficking occurs either in our business or in our supply chain.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018.

Signed:

A handwritten signature in black ink, appearing to read "Mark Howell", written over a horizontal dotted line.

Name: Mark Howell

Designation: Managing Director

Marshall Thermo King Ltd

Date: 13 May 2019