

Prevention of Modern Slavery Statement

This statement is made pursuant to section 54.1 of the Modern Slavery Act 2015 and constitutes Marston Holdings Limited and NSL Limited ("Marston") modern slavery statement for the financial year ending 31 May 2023.

Marston is committed to ensuring modern slavery does not exist in its organisation or supply chains.

We constantly strive to develop policy and procedures to manage the way we obtain our goods and services, recruit and train colleagues, and raise awareness of the risk of modern slavery and human trafficking. To date we have had no reports of modern slavery, either within our organisation or our supply chains.

Marston supports the government, utilities and private sectors through the delivery of market leading integrated technology-enabled solutions from design and implementation to management and debt recovery.

Marston's first tier supply chain is primarily UK based suppliers. Due to the nature of our business and our high standards of corporate governance we assess that there is a low risk of modern slavery in our business and supply chains.

The Executive Committee has apportioned responsibility for the prevention of modern slavery to the Chief Risk Officer.

Marston's Prevention of Modern Slavery Policy sets out in writing how it achieves its policy objectives together with the steps taken to prevent modern slavery and human trafficking from occurring within the organisation or supply chains.

Supply Chain Due Diligence and Risk Assessment

All major procurement is channelled through the Procurement team to ensure the correct supplier due diligence is carried out.

A mandatory compliance questionnaire is completed as part of the onboarding process to evidence the specific measures in place to mitigate the risk of modern slavery and human trafficking.

Recruitment Due Diligence and Risk Assessment

All permanent, temporary and contract staff are subject to the group vetting policy which contains specific questions in relation to the risk of modern slavery and human trafficking:

- The source of any candidates
- Whether candidates have the right to work in the UK
- Identity verification and other personal details

Colleague Training and Awareness

All colleagues are required to complete Safeguarding Awareness Training when they first join Marston and then to periodically refresh their training. The Safeguarding Awareness Training includes a standalone module on modern slavery which was devised in consultation with, and with content from, the Gangmasters and Labour Abuse Authority.

Measuring Effectiveness of the Steps Being Taken

Marston is committed to the highest possible standards of openness, honesty and accountability. Marston recognises that there may be times where colleagues and self-employed contractors have legitimate concerns which they may not feel comfortable raising with colleagues and has put in a place a whistleblowing policy. Marston uses Safecall, a confidential whistleblowing hotline which is monitored 24 hours, 7 days a week.

A review of the Prevention of Modern Slavery Policy is completed annually and the results are reviewed by the ESG Committee, which is a sub-committee of Executive Committee.

Signed,

Chief Risk Officer
October 2023
