



Modern Slavery

Transparency Statement 2022

This statement has been produced in accordance with the Modern Slavery Act 2015. It constitutes our Modern Slavery Transparency Statement for Travis Perkins plc and its relevant group subsidiaries¹ for the financial year ending 31st December 2022. Travis Perkins plc and its subsidiary companies are referred to as the Travis Perkins Group or “The Group” throughout this statement.

Introduction

The Travis Perkins Group is opposed to all forms of unethical business behaviour. We recognise the harmful impact that Modern Slavery has on individuals and society and we are committed to help prevent these illegal practices. Modern Slavery is one of the focus areas that make up our **Environmental, Social and Governance (ESG) framework** at Travis Perkins plc - our customers, suppliers, investors, colleagues and communities expect us to manage this risk and protect the rights and welfare of workers within our own business and our supply chains.

Our businesses and our supply chains

Travis Perkins Group is the largest distributor of building materials and products in the UK, serving a broad range of end markets from generalist to specialist propositions in the building, construction and home improvement markets. The Group's businesses are materials suppliers apart from Staircraft; a market leading company that manufactures integrated stair, floor and door solutions. In 2022, there were 19,385 colleagues in the Group and over 1,500 branches and we generated £4.9 billion revenue. The Group's key brands include Travis Perkins, Toolstation, BSS, Keyline, CCF, Benchmarx, TP Hire, TF Solutions and Staircraft. All Group subsidiaries with a turnover of £36 million or more in 2022 are listed in the footer at the bottom of this page. Each of these businesses operate within the UK apart from Toolstation Europe which represents 2% of Group turnover. Toolstation Europe operates in France, Belgium and the Netherlands. The Group's businesses have complex supply chains, sourcing products predominantly in the UK but with extended supply chains that stretch around the world.

For further detail on the business structure and the business model, please see [Travis Perkins plc Group Businesses](#).

60% of products sold in 2022 were delivered to customers either via our own distribution channels or direct from our suppliers. 40% of products sold in 2022 were collected by customers from our branches. Our product categories range from construction products for building, repair, maintenance or improvement to industrial civil engineering products, plumbing and heating systems, kitchens and bathrooms.

Policies and control on Modern Slavery

The Travis Perkins Group is committed to doing the right thing. We manage a governance framework for all material focus areas within our sustainable business framework, including Modern Slavery. A Modern Slavery and Human Trafficking policy (“Policy”) is in place, approved by the Group Leadership Team, detailing the commitments that all businesses in the Travis Perkins Group align to in order to prevent these risks from occurring either in our own business or our supply chains. This policy and all other policies and tools referred to in this statement apply to the Group's businesses outside the UK to the extent practicable and providing they do not conflict with local legislation.

The Group's policy commitments on Modern Slavery and Human Trafficking are as follows:

- We will assess Modern Slavery and Human Trafficking risks in our business and supply chain.
- We will comply with all relevant employment and human rights laws for the countries in which we operate.
- We will conduct due diligence on labour agencies to prevent, identify and mitigate the risks of slavery and human trafficking.
- We will conduct due diligence on contractors to prevent, identify and mitigate the risks of slavery and human trafficking.
- We will define clear supplier expectations and assess supplier compliance according to identified risk.
- We will make guidance available to suppliers and customers to support their due diligence programmes.
- We will provide training to employees including on the ‘red flags’ of Modern Slavery and Human Trafficking.
- We will provide a ‘Speak Up’ line for employees and those external to our business to anonymously report any concerns.
- We will monitor performance against Key Performance Indicators to continually improve.

¹ For 2022, this includes all relevant, active subsidiary companies according to the requirements of the Modern Slavery Act 2015: Travis Perkins Trading Company Limited, Travis Perkins plc, Travis Perkins (Properties) Limited, TP Property Company Limited, Toolstation Limited, Toolstation Europe Limited, Tool & Fastener Solutions Limited, Keyline Civils Specialist Limited, CCF Limited, The BSS Group Limited, Staircraft Group Limited and TSE Netherlands BV.



Compliance with the Policy is monitored and managed through a 'minimum standard' tool, allowing each business to assess its status against the Policy requirements. All colleagues are accountable for compliance with the Policy. Compliance is managed and supported through training. Accountability for delivering against the Group's commitments has been clearly mapped. There is a Group Lead for Modern-Slavery and Human Trafficking who works with nominated leads in each of the Group's businesses, both within commercial (for the supply chain) and within HR (for our own business). A Group Leadership Team sponsor monitors performance and supports continued improvement. The Modern Slavery and Human Trafficking policy is supported by other policies including a Responsible Sourcing policy, Recruitment policy and a Speak Up policy.

We are clear to our suppliers about our expectations of them. Since 2008 we have published and updated a **'Supplier Commitments'** document setting out our expectations of and the minimum requirements we expect our suppliers to meet, including, amongst other matters, details of our requirements concerning environmental and social behaviours in our supply chain. Specific **guidance** is also provided on modern slavery. We work with our suppliers to help them meet our expectations and requirements. The Supplier Commitments have been communicated to our suppliers and incorporated into our supplier manual and responsible sourcing procedures. The supplier due diligence process, described in the following section, includes an assessment against the requirements of the Supplier Commitments.

Regarding our own colleagues, we uphold high standards, operate in line with our recruitment policies and comply fully with the relevant employment laws and right to work checks for the countries within which we operate. We have clear standards of conduct which are included in our Code of Conduct ("Code"). The Code includes a specific section on modern slavery, including the red flags for colleagues to be aware of.

The employee due diligence process, described in the following section, includes checks both across our direct colleague population and any temporary employees recruited via agencies.

A culture of calling it out

Our colleagues and external stakeholders (via our plc website) have access to our independently managed 'Speak Up' whistleblowing line and are encouraged to report any concerns. No modern slavery related reports were registered via the 'Speak Up' line in 2022.

Risk assessment

We acknowledge that any globally complex operations, such as ours, carry with them the risk of modern slavery in their business or supply chains. We operate modern slavery risk assessments informed by the Global Slavery Index, the Corruption Perceptions Index and the Worldwide Governance Indicators (WGI) - World Bank, taking into account country-level, product-level and supplier-type risks. Product-level risk is determined based on the level of manual or seasonal labour required to manufacture products as there is greater risk of exposure of manual and temporary workforces to risks of slavery.

Due diligence

Due diligence within our supply chains:

Centrally-controlled suppliers of products for resale to our UK businesses go through a due diligence process which comprises three stages. Firstly, a contractual commitment to our ethical requirements through reference to our Supplier Commitments in the standard trading agreement. Secondly, an assessment of compliance with our Supplier Commitments through an 'Online Risk Assessment' ("ORA") questionnaire. The ORA frequency is determined by perceived supplier risk with a maximum three year cycle. The ORA includes but is not limited to 'business ethics', 'labour and human rights', 'environment', 'health & safety' and 'product quality'. On completion of the ORA, the supplier receives notification of any identified non-conformances. Based on the results, either our third party expert auditing partner, Verisio, or our experienced QA team contacts the supplier to request further documentary evidence or requires the supplier to undertake additional tasks to demonstrate compliance or to mitigate risk.

A third stage of assessment is in place for manufacturers of our own-brand (or no-brand, i.e. commodity) products; a site audit programme. For a factory to be approved to manufacture on our behalf they need to pass two site audits, one technical and one ethical. The ethical audits are scheduled with a typical two year frequency, conducted by an approved independent 3rd party, including worker interviews. Where sites already hold an internationally-recognised report for ethical assessment, these are accepted and reviewed by our businesses. Ethical audits are semi-announced as far as possible although with Covid-19 restrictions this has not always been viable. We work with our manufacturers to ensure that any critical non-conformances are addressed before any further activity is undertaken with them. Suppliers of own-brand products are not always required to complete an ORA as the site audits already cover this content.

Where non-conformances are identified, the primary aim is to ensure remediation for workers and for processes to be put in place to avoid recurrence. Where suppliers can demonstrate a commitment and ability to close identified issues we will continue working with them. However, where there is no evidence of commitment to sustained improvement, work with the supplier or site will be ceased.

These three stages of assessment form our minimum expectation around supplier due diligence and work is ongoing to bring all Group businesses and all centrally-controlled suppliers under this framework or, for our European businesses, an aligned but market-tailored approach. During 2022 more than 1,300 suppliers have been engaged within the ORA programme whether for submissions or non-conformance mitigation. Audits continued across manufacturing sites, and in 2022, 139 factory audits were completed.

Additionally, over 99% of Group timber spend in 2022 was certified as responsibly sourced through a chain of custody system (70% FSC® and 29% PEFC™). This data has been published in the **Group Annual Report** (p.37). Both the FSC® and PEFC™ certification schemes require compliance with the ILO Declaration on Fundamental Principles and Rights at Work, 1998, prohibiting the use of forced or child labour.



Our suppliers of 'goods not for resale' ("GNFR") or services are also in scope for due diligence, based on their risk level, and work is ongoing to assess these suppliers. A number of our contractors are assessed by the Facilities Management team as part of the onboarding process, including 'modern slavery' questions. High-risk labour agencies are also assessed and this process is described further below.



Due diligence within our own business²

Direct recruitment into the Group's businesses follows the Recruitment policy which adheres to regulatory requirements relating to right to work checks. Group Internal Audit periodically reviews the processes and controls that ensure compliance with employment law, including an assessment of right to work checks. This audit was completed in 2021. Additional due diligence is conducted to identify red flags of modern slavery across our directly-employed workforce. This entails annual analysis of colleague data to identify any potential concerns such as high-occupancy levels at the same addresses or shared banks. No red flags were raised relating to modern slavery through this assessment during 2022.

Recruitment of agency workers into the Group's businesses is also under assessment and due diligence is undertaken according to the identified risk-level. All agencies used by the Group's distribution centres, which employ a high level of manual labour, undergo comprehensive checks. Firstly, a contract must be in place which details our expectations around their own due diligence to prevent modern slavery. Secondly, the agency must provide a 'sign off sheet' for each agency worker coming to our sites, including their name and photograph. And thirdly, the agency workers must bring their identification documents on their first day so that our business can check them against the sign off sheets. This ensures that the worker we are expecting has arrived at site but also, crucially, that the worker has access to their own documents - confiscation of victims' identification documents in order to exert control over them is a common tactic used by gangs involved in modern slavery.

Issue response

We have an issue response plan which details how the business will deal with any incidences of modern slavery identified within our own business or our supply chains. This details how we will support victims as well as how we will manage investigations and in the case of suppliers, how we will suspend trading with them while supporting them to mitigate the identified issues and risks. We engaged the Slave Free Alliance during 2021 and 2022 to enhance the issue response plan and develop detailed guidance to support our business and take a victim-first approach should any incidents occur. Colleagues across Responsible Sourcing, Sustainability, Commercial, Security, HR, Recruitment and Distribution teams participated in the process, ensuring that the outputs truly reflect our businesses and our procedures.

Training

All colleagues: Since 2020, a Code of Conduct has been issued to all UK colleagues which includes a section on modern slavery and details the modern slavery red flags which colleagues should remain alert to. Roll-out was completed across all UK businesses during 2021. A bite-sized mandatory modern slavery training module for all UK colleagues was developed in 2022 and will launch in 2023.

Higher-risk roles: Face-to-face detailed training for colleagues whose roles may be more likely to involve exposure to modern slavery risk was provided in 2021 and 2022. This includes Commercial teams, the Asia-based Sourcing teams, HR and recruitment teams and other key operational roles (such as Distribution Centre Managers and Freight teams). An updated in-depth mandatory modern slavery training module for higher risk colleagues was developed in 2022 and will launch in 2023 to retrain all colleagues in higher risk roles.

Performance

Our leading KPI for anti-slavery performance is training completion. We also track whether there have been any reported incidents of modern slavery during the year.

High-level training on Modern Slavery for all colleagues - 93% complete.

Code of Conduct training has been provided to colleagues and this includes a specific page on modern slavery, highlighting the red flags to look out for, detailing the key 'do's' and 'don'ts' and a reminder for colleagues of the 'Speak Up' line for reporting any concerns. 93% of colleagues have received the Code through this training.

In December 2022 an updated mandatory Code of Conduct training module was rolled out to all colleagues across the Group with completion planned during the first quarter of 2023 to capture the remaining colleagues. In addition, the Group and business newsletters were used to remind colleagues to be alert to the red flags of modern slavery in December 2022 to maintain awareness.

Detailed training on Modern Slavery for higher-risk roles - 96% complete

The training module for modern slavery which launched in 2020 has now been delivered to 505 colleagues, representing 96% of the total population of higher-risk colleagues, including colleagues in Toolstation Europe. An updated mandatory modern slavery training module for higher risk colleagues will launch in 2023, this will complete training for the remainder of colleagues in higher-risk roles.

Industry specific colleague training

The Group Lead for Modern Slavery attended a virtual training session hosted by "Stronger Together" on "Tackling Modern Slavery in Global Supply Chains" and the Group Construction Director and two of the construction team attended the "Stronger Together" training session "Tackling Modern Slavery in the Construction Sector". These courses provided insight on further development of our controls as well as the opportunity to share best practices within our industry.

Identified incidents

No incidents of modern slavery were identified in our own business or our supply chains during 2022. We promote a culture of 'calling it out' and recognise the importance of identifying modern slavery concerns. Our colleagues and external stakeholders are encouraged to report any concerns to our 'Speak Up' whistleblowing line which is advertised to colleagues through internal communications and externally via our plc website.

²Toolstation Europe businesses follow their own recruitment policies to comply with local laws in France, Belgium and The Netherlands.



Progress in 2022

Besides the continued evolution of our existing due diligence programmes (see the “Due diligence” section), we set out to improve in four key areas during 2022. Progress made is summarised below.

Expanding the roll-out of the product supplier assessment programme

The ORA continued to be rolled out in 2022 with an additional 284 suppliers assessed, raising the number of suppliers of goods for resale which have been assessed, or are in assessment, to in excess of 1,300 suppliers. This represents in excess of 80% of Group spend with suppliers of goods for resale. A risk-based approach to reassessment of existing suppliers was developed in 2022, with low risk rated suppliers reassessed on a three year cycle and higher risk suppliers reassessed after two years. This will be implemented in 2023. A regional trial of the “lite” version of the assessment for lower spend suppliers was launched in 2022 and will be expanded into further regions during 2023. Ethical site auditing continued, whether through SMETA, BSCI or an in-house enhanced ethical audit format, with 93 own-brand or no-brand manufacturing sites assessed in 2022. ORA and audit submissions have been reviewed by Verisio, as a third-party expert auditing partner, with suppliers risk rated and issued a corrective action plan to close any identified non-conformances.

Assessment of GNFR suppliers and service providers

A bespoke assessment for suppliers of “Goods Not For Resale” (GNFR) and service providers was finalised in 2022, with input from key suppliers to refine the approach. This will be launched to suppliers in 2023 on a risk-basis to the highest risk GNFR suppliers and service providers across all businesses and Group functions.

Increasing ID checks at site

In-person ID checks have been introduced at the central Head Office site for third-party cleaning staff. The trial will be expanded into other parts of the Group during 2023 on a risk basis, for example to waste management contractors and other agency workers.

Upskilling in the supply chain - supporting suppliers to develop ethical competencies

In September a series of online sessions was delivered to raise awareness of modern slavery, to highlight the red flags and to signpost to both the Travis Perkins SpeakUp! Hotline and the Modern Slavery & exploitation helpline. These were extended to both suppliers and colleagues, with the sessions attended by 388 people. Individual suppliers were supported throughout the year to develop their modern slavery controls, where non-conformances had been identified through the ORA.

In addition to these, the Group appointed a new Head of Ethical and Responsible Sourcing in February 2022 who, as the Group Lead for Modern Slavery and Human Rights, leads on our efforts in tackling modern slavery and bringing consistency to our approach across the businesses.

Focus for 2023

Increasing ID checks at site

It remains a priority for the Group to expand third party ID checks at site to include a broader set of third parties, based on risk. The trial conducted in 2022 will be expanded into other parts of the Group during 2023 on a risk basis, for example to waste management contractors and other agency workers.

Evolving and expanding the Group’s product supplier assessment programme

The ORA (shared by all businesses in the Group) will be updated in 2023 to ensure this continues to address supply chain risk. The updated and recalibrated ORA will be issued to existing suppliers when their reassessment period becomes due, will be used to onboard new centrally-managed suppliers and will be issued to the next phase of suppliers on a risk-based approach. The trial of the proportional version of the assessment for lower spend suppliers will be expanded further across the Group in 2023.

Assessment of GNFR suppliers and service providers

Bespoke assessments for suppliers of “Goods Not For Resale” (GNFR) and service providers will be launched to suppliers in 2023 on a risk-basis to the highest risk GNFR suppliers and service providers across all businesses and Group functions.

Training and awareness within our business and supply chain

New modern slavery colleague training will be rolled out to colleagues across the Group in 2023. This comprises an in-depth module for high-risk colleagues and a bite-sized module for all other colleagues. At our sites, posters will be used to raise awareness of modern slavery and to signpost colleagues and visitors of how to raise concerns. Supplier workshops will support suppliers to identify and prevent the risk of modern slavery in their own businesses and supply chains.

Publish a Group Human Rights Policy

In 2023, the Group will develop and publish a Human Rights Policy to detail our existing credible approach and expectations within a single document and provide clarity to colleagues and external stakeholders.

We will continue to develop our approach, review our progress and publish an updated statement annually. We continue to take into account the Maturity Framework and the Agenda for Action developed by the Independent Anti-Slavery Commissioner, Dame Sara Thornton, as we develop our plans. These were shared in June 2020 in the

[IASC Operation Fort Report](#), p.29-30.



Nick Roberts
Chief Executive
Travis Perkins plc
30th March 2023

This statement was approved by the Board of Travis Perkins plc on 30th March 2023 on behalf of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2022.