



Modern Slavery

Transparency Statement 2021

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 2021. 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 strong core 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 which the Group fully acquired in October 2021. Staircraft represented less than 1% of revenues in 2021. In 2021, there were 19,988 colleagues in the Group and 1,513 branches and we generated £4.6 billion revenue. The Group's key brands include Travis Perkins, Toolstation, Benchmark, BSS, Keyline, CCF and Staircraft. All Group subsidiaries with a turnover of £36 million or more in 2021 are listed in the footer at the bottom of this page. All 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 2021 were delivered to customers either via our own distribution channels or direct from our suppliers. 40% of products sold in 2021 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, bathrooms and DIY products.

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 2021, 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, BSS (Ireland) Limited, P. H. Properties Limited and Staircraft Group Limited.



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 Anti-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 employees, 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 employee population and any temporary employees recruited via agencies.

A culture of calling it out

Our employees and external stakeholders (via our plc website) have access to our 'Speak Up' whistleblowing line and are encouraged to report any concerns. No modern slavery related reports were registered via the 'Speak Up' line in 2021.

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. All suppliers from our UK-based businesses were assessed against a new risk-profiling tool in the last twelve months. Toolstation France risk-profiled its suppliers during 2021. Toolstation Benelux suppliers will be risk profiled in 2022.

Due diligence

Due diligence within our supply chains:

Our 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, which was relaunched during 2020 and is run on a two year cycle, 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 conducted by an approved independent 3rd party, including worker interviews. Where sites already hold the internationally-recognised SMETA 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 2021 more than 1200 suppliers have been engaged within the ORA programme whether for submissions or non-conformance mitigation. Audits continued across manufacturing sites, albeit some were delayed due to Covid-19. These were rescheduled as soon as possible.

Additionally, over 98% of Group timber spend in 2021 was certified as responsibly sourced (49% FSC® and 49% PEFC™). This data has been published on the **Group website**. 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. Our primary freight forwarder has been consulted regarding their 'modern slavery' controls. 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 employee data to spot high-occupancy levels at the same addresses, shared banks and shared internal cost centres. No red flags were raised relating to modern slavery through this assessment during 2021

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. 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 worked with them over several weeks, into 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. The Slave Free Alliance were able to offer expert insights to the exercise and they will be training critical colleagues during 2022.

Training

All colleagues: A new Code of Conduct was launched in 2020, which includes a section on modern slavery and details the modern slavery red flags which colleagues should remain alert to. The Code of Conduct is issued to all UK employees. Roll-out was completed across most UK businesses in 2020 and was completed during 2021. A Modern Slavery training module complimenting and supporting the Code of Conduct was also launched to all UK colleagues over the last two years; with the intention of subsequently implementing equivalent training for colleagues outside the UK. A bite-sized mandatory Modern Slavery training module for all UK colleagues will launch in 2022.

Higher-risk roles: Face-to-face detailed training is provided for colleagues whose roles may be more likely to involve exposure to Modern Slavery risk. This includes Commercial teams, our Asia-based Sourcing teams, HR and recruitment teams and other key operational roles (such as Distribution Centre Managers and Freight teams). An in-depth training module is conducted with higher risk colleagues (see next section). The in-depth module will be refreshed with the latest insights, examples and controls during 2022 and all higher-risk roles will be re-trained.

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.

This has been implemented via the new Code of Conduct launch which took place across 2020 and 2021. A specific page on modern slavery is included in the Code, highlighting the red flags to look out for, detailing the key 'do's' and 'don't's' and a reminder for colleagues of the 'Speak Up' line for reporting any concerns.

The Code has now been received by all UK colleagues excluding Staircraft colleagues who, as a new acquisition, will be included from 2022. 93% of colleagues have now received the Code.

Code of Conduct training was given to colleagues across 2020 and 2021 to support engagement with the new Code. In addition, colleagues were reminded of the red flags of modern slavery via the Group and business weekly newsletters in December, to keep awareness levels up.

Detailed training on Modern Slavery for higher-risk roles - 92% complete

The new training module for modern slavery which launched in 2020 has now been delivered to 267 colleagues, representing 92% of the total population of higher-risk colleagues, including colleagues in Toolstation Europe. Other training sessions are planned within the first quarter of 2022 to complete training for the remainder of colleagues in higher-risk roles.

Identified incidents

No incidents of modern slavery were identified in our own business or our supply chains during 2021.

We promote a culture of 'calling it out' and recognise the importance of identifying modern slavery concerns. Our employees and external stakeholders are encouraged to report any concerns to our 'Speak Up' whistleblowing line which is advertised to employees 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 2021

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 2021. Progress made is summarised below.

Continued roll-out of the new Online Risk Assessment (ORA) and ethical audits

The ORA rollout continued in 2021, with the new assessment completed by 667 suppliers. The move to enhanced ethical site auditing continued, whether through SMETA, BSCI or an in-house enhanced ethical audit format, with 84 own-brand or no-brand manufacturing sites assessed against the new ethical audit format in 2021. 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.

Expanding labour agency due diligence

Agencies supplying a high number of manual labour colleagues to our businesses (in our Distribution Centres) have been under assessment for over a year. The tail of labour agencies was reviewed during 2021 and to manage in-house risk, the Group established a new project looking to extend the work already completed on higher-risk, high-volume agencies of manual labour. The project team is reviewing the tail of labour agencies used for both head office and branches and in 2022 will work to establish controls to reduce risk in this area.

Improved consistency and engagement with GNFR suppliers and service providers

A bespoke online risk assessment was developed during 2021 for use with higher-risk GNFR suppliers and service providers to bring greater consistency to the way we assess and manage modern slavery risk across these supplier types. GNFR and service provider assessments will roll out based on risk during 2022

Extending access to our Speak Up line to suppliers

It is critical that workers within the Group’s supply chain have the means to anonymously call out concerns. The Speak Up line has been shared on the plc website and a verbal update on this was given to the Group’s top 329 suppliers during the Group Supplier Conference held in person in November 2021.

Enhanced supplier engagement on Modern Slavery

The importance of assessing and mitigating modern slavery risks was shared with 329 of the Group’s top suppliers at the Group Supplier Conference. Individual suppliers were engaged throughout the year to support develop of their own modern slavery controls, where non-conformances had been identified through the ORA. For example, a number of suppliers sought our assistance to understand how to risk assess their own business and supply chain. Supplier engagement and support will continue into 2022 as forums will take place to up-skill on modern slavery and wider responsible sourcing requirements.

Focus for 2022

Expanding the roll-out of the product supplier assessment programme

The new ORA (shared by all businesses in the Group) will continue to be rolled out to new centrally-controlled suppliers and will be re-issued to existing suppliers when their two-year assessment period becomes due. In 2022, the Group will develop a risk-based approach to roll-out an ORA to the next phase of lower-spend suppliers.

Assessment of GNFR suppliers and service providers

Suppliers of GNFR or services are in scope for due diligence, based on their risk level, with a number of contractors and high-risk agencies already subject to assessment in 2021. The assessment approach will be rolled out during 2022 on a risk basis to highest risk GNFR suppliers and service providers across all businesses and Group functions.

Increasing ID checks at site

A priority for the Group in 2022 is to expand third party ID checks at site to include a broader set of third parties, based on risk. For example, cleaners, waste management contractors and other agency workers.

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

Supplier online forums will be run to support suppliers in developing their own controls to identify and prevent the risk of modern slavery in their own businesses and supply chains.

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
25th March 2022

This statement was approved by the Board of Travis Perkins plc on 25th March 2022 on behalf of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2021.