



# Modern Slavery

## Transparency Statement 2023

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 subsidiaries<sup>1</sup> for the financial year ending 31st December 2023. 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 makes 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 2023, there were 18,680 colleagues in the Group and over 1,500 branches and we generated £4.8 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 2023 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 c.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 2023 were delivered to customers either via our own distribution channels or direct from our suppliers. 40% of products sold in 2023 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.

<sup>1</sup> For 2023, 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 Rights 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, Human Rights 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 2023.

Following the launch of updated colleague training in 2023 to 'spot the signs' of modern slavery, a report of concern was reported to the human resources team. The Group's internal escalation process was followed, with investigation determining there was no modern slavery breach. The experience validated the Group's approach to training and escalation processes, which continues to be supported by rollout of mandatory training to support colleague awareness of the signs to look out for and the process to call out concerns.

## 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 directly imported 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 third 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 during the recent audit cycle. 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, or where suppliers do not comply with our ethical audit processes, work with such suppliers or relevant sites will cease.

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 2023, 357 suppliers submitted ORAs, a mixture of suppliers completing their initial assessment and those due for reassessment. In total, 1382 suppliers have been engaged in the ORA programme during 2023 whether for submissions or non-conformance mitigation. Audits continued across manufacturing sites, and in 2023, 220 factory audit gradings were completed. The Group's supplier assessment programme accounts for in excess of 85% of total Group spend on products for resale.

Additionally, over 90% of Group timber spend in 2023 was certified as responsibly sourced (55% FSC® and 35% PEFC). This data has been published in the **Group Annual Report** (p.38). 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 as part of the Facilities Management team onboarding process, including 'modern slavery' questions. High-risk labour agencies are also assessed and this process is described further below. Bespoke GNFR assessments were launched to suppliers in 2023. A GNFR ORA was developed with Verisio, our third party expert auditing partner and tested within the supply chain and a bespoke in-house assessment tool was tested on technology service providers.



### Due diligence within our own business<sup>2</sup>

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 and is due for review in 2024. 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 bank accounts. No concerns of modern slavery were raised through this assessment during 2023.

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. Slave Free Alliance helped develop detailed guidance to support our business and take a victim-first approach should any incidents occur. In 2023 Slave Free Alliance delivered training on this to key internal colleagues, including Responsible Sourcing, Sustainability, Commercial & Security.

### Training

**All colleagues:** In 2023 a bite-sized mandatory modern slavery training module for all UK colleagues was launched through our Thrive learning platform, detailing the modern slavery red flags colleagues should remain alert to and how to report concerns. In addition, since 2020 a Code of Conduct has been issued to all UK colleagues which includes a section on modern slavery.

**Higher-risk roles:** Detailed mandatory training was launched, through our Thrive learning platform, in 2023 for colleagues whose roles may be more likely to involve exposure to modern slavery risk. This includes Commercial teams, HR and recruitment teams and other key operational roles (such as Distribution Centre Managers and Freight teams). The new module complements the face-to-face detailed training provided in 2021 and 2022.

### 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 - 83% complete.

Modern slavery training has been completed by over 15,000 colleagues, 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. In addition, the Group business newsletter was used in April 2023 to remind colleagues of the risk of modern slavery and of the new training launched to support this.

#### Detailed training on Modern Slavery for higher-risk roles - 82% complete

An updated mandatory modern slavery training module for higher risk colleagues launched in 2023 and has been completed by over 2800 colleagues. In 2023 the scope of colleagues allocated this training was increased from 500 to over 3500 following review of higher risk role types. Outstanding training will be completed in early 2024.

### Industry specific colleague training and collaboration

The Group Lead for Modern Slavery sits on the Supply Chain Sustainability School's Modern Slavery Working Group, whose purpose is to support the sector to identify, prevent, mitigate and remediate modern slavery risks and labour exploitation. The Group Lead also sits on the Slavery & Trafficking Risk Template Development Committee to develop shared tools and assist efforts to comply with human trafficking and modern slavery legislation. These collaborative forums provide 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 2023.

Following output from our ethical audit programme, during 2023 the Group undertook 10 unannounced 'spot check' audits on higher risk sites. These unannounced in-person audits were completed by our third party expert auditing partner, Verisio and included assessment of modern slavery and labour exploitation.

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



## Progress in 2023

Besides the continued evolution of our existing due diligence programmes (see the “Due diligence” section), we set out to improve in five key areas during 2023. Progress made is summarised below.

### Evolving and expanding the Group’s product supplier assessment programme

The ORA was updated in 2023. Working in conjunction with Group Leads, the question set and scoring criteria was assessed and right-sized to account for changing supply chain risks. This recalibrated ORA was launched to existing suppliers as their reassessment period became due, was used to onboard new suppliers, and was issued to the next phase of suppliers on a risk-based approach.

During 2023, 357 suppliers submitted ORAs, accounting for suppliers completing their initial assessment and those due for reassessment. In total, 1382 suppliers were engaged in the ORA programme. In addition, 151 in-person ethical audit gradings were completed on own brand product manufacturing sites, with all ethical audits completed by a third-party auditor. During 2023, The Group’s supplier assessment programme accounted for in excess of 85% of total Group spend on products for resale, an increase of 5% since 2022. A “lite” version of the assessment has been rolled out for lower spend suppliers and this will be embedded for all new accounts set up within the Group’s new Apex finance system.

### Assessment of GNFR suppliers and service providers

A new bespoke questionnaire was launched in 2023 for GNFR suppliers, using the same assessment system hosted by Verisio as is used for the Group’s suppliers of products for resale. The GNFR supplier list has been risk profiled to allow the business to prioritise assessments in 2024 either using this system or the GNFR “lite” assessment. The GNFR “lite” assessment was trialled on technology suppliers to better understand risks across this supplier type and will be expanded into other parts of the Group during 2024 on a risk basis.

### Training and awareness within our business and supply chain

Two modern slavery training modules were rolled out across the Group in 2023, an all-colleague bite-size module and a key-colleague training module for those in roles more likely to observe or manage modern slavery risks. In October, as part of anti-slavery week, a series of online sessions were delivered to raise awareness of modern slavery and to support suppliers to identify and prevent the risk of modern slavery in their own businesses and supply chains. Insight from our supplier assessment programme was shared, with guidance provided on how to mitigate common issues. These were extended to both suppliers and colleagues, with the sessions attended by 75 people.

### Increasing ID checks at site

In-person ID checks were introduced during ‘2nd line’ construction reviews, to include assessment of Right to Work checks, worker access to ID and to report any red flags of Modern Slavery. In addition, a branch login app was trialled across a number of branches. Learnings from this will inform our future plans. Additionally, a review of labour agency use has been conducted, and this will inform development of improved controls within our temporary labour usage, with Modern Slavery controls forming part of the tender process assessment.

### Publishing a Group Human Rights Policy

A new human rights policy was published in October 2023 to ensure that internal and external stakeholders can understand our level of commitment.

## Focus for 2024

### Increasing ID checks at site

It remains a priority for the Group to further develop in-person ID checks, informed by learnings from trials conducted in 2023, to expand checks currently conducted on higher-risk labour agency workers, to include other third parties working at the Group’s sites, based on risk.

### Evolving and expanding the scope of the Group’s supplier assessment programme

The ethical audit (shared by all businesses in the Group) will be reviewed and updated in 2024 to ensure this continues to address supply chain risk. This will be issued to existing suppliers when their reassessment period becomes due and will be used to onboard new own-brand suppliers. The ORA will be issued to the next phase of suppliers on a risk-based approach. The Group approach to due diligence will continue to be developed, targeting that the Group’s supplier assessment programme will cover 90% of the Group spend on product for resale by the end of 2024.

### Assessment of GNFR suppliers and service providers

The GNFR ORA and “lite” assessment will be expanded to suppliers in 2024 on a risk-basis across all businesses and Group functions. Following a review of labour agency use, Modern Slavery controls will form part of the tender process assessment. ESG and Modern Slavery considerations will form part of other GNFR or service provider tendering activity during 2024.

### Industry Collaboration

The Group Lead will support and engage in strategic collaborations to mitigate human rights risk in our own business operations and our supply chains. We will continue to engage with the Supply Chain Sustainability School’s Modern Slavery Working Group, to facilitate engagement with the wider construction sector, to build knowledge and share best practice.

### Training and awareness within our business and supply chain

Modern slavery training will continue to be rolled out to all colleagues, with content reviewed during 2024 to enhance and develop these materials. Rollout of posters at our sites will continue, used to raise awareness of modern slavery and how to raise concern. We will continue to work with suppliers to support them to identify and prevent the risk of modern slavery within their businesses and supply chains.

### Developing and updating our approach to supply chain risk assessment

Our approach to supply chain risk assessment will be reviewed and enhanced in 2024, to update and refresh understanding of inherent risk, support activity to review what controls are already in place and prioritise further activity. This will be informed through engagement with the Supply Chain Sustainability School’s Modern Slavery Working Group.

We will continue to develop our approach, review our progress and publish an updated statement annually.



**This statement was approved by the Board of Travis Perkins plc on 22nd April 2024 on behalf of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2023.**

**Nick Roberts, Chief Executive Officer**  
Travis Perkins plc  
22nd April 2024