



# Modern Slavery

## Transparency Statement 2024

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 for the financial year ending 31st December 2024. Travis Perkins plc and its subsidiary<sup>1</sup> 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 internal and external stakeholders 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 manufacturer of integrated stair, floor and door solutions. In 2024, there were 17,464 colleagues in the Group and over 1,400 branches and we generated £4.6 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 2024 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 Belgium and the Netherlands (previously in France, although the French operation was closed during 2024). 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 2024 were delivered to customers either via our own distribution channels or direct from our suppliers. 40% of products sold in 2024 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 2024, 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 2024.

## 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 an ethical site audit. 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. 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 2024, 392 suppliers submitted ORAs, a mixture of suppliers completing their initial assessment and those due for reassessment. In total, 1,403 suppliers have been engaged in the ORA programme during 2024 whether for submissions or non-conformance mitigation. Audits continued across manufacturing sites, and in 2024, 199 factory audit gradings were completed. The Group's supplier assessment programme accounts for in excess of 90% of total Group spend on products for resale.

Additionally, over 90% of Group timber spend in 2024 was certified as responsibly sourced through a robust chain of custody system using FSC® and PEFC. This data has been published in the [Group Annual Report](#) (p.32). 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 extended to additional suppliers in 2024. A GNFR ORA was initiated with a selection of suppliers, alongside expanded internal assessments, now covering 54% of our Group's GNFR spend.



**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. 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 2024.

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.

**Training**

**All colleagues:** In 2024, the mandatory bite-sized training on modern slavery red flags and reporting, initially launched in 2023, remained a requirement for all colleagues through our Thrive learning platform. 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 Thrive training, launched in 2023, continued to be required for colleagues in roles with higher potential exposure to modern slavery risks, including Commercial, HR and recruitment, and key operational teams like Distribution Centre and Freightling.

**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 - 91% complete.**

**Modern slavery training has been completed by over 15,000 colleagues** in the last two years, 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.

**Detailed training on Modern Slavery for higher-risk roles - 83% complete**

An updated, detailed mandatory modern slavery training module for higher-risk colleagues has been completed by over 4,000 colleagues since launch in 2023, ensuring key teams are equipped to identify and mitigate risks.

**Industry specific colleague training and collaboration**

The Group Lead for Modern Slavery actively participates in 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. This engagement provides vital insights for refining our internal controls and fosters collaboration within our sector. In 2024, our business contributed to the creation of the ‘Operational Toolkit: Combatting Slavery in the Built Environment,’ a resource designed to equip site personnel with tools to combat labour exploitation.

**Identified incidents**

No incidents of modern slavery were identified in our own business or our supply chains during 2024.

<sup>2</sup>Toolstation Europe businesses follow their own recruitment policies to comply with local laws.



## Progress in 2024

Besides the continued evolution of our existing due diligence programmes (see the “Due diligence” section), we set out to improve in six key areas during 2024. Progress made is summarised below.

### Increasing ID checks at site

Further analysis of temporary labour use was completed and will inform future recruitment practices. Additionally, a review of in-person site checks by our construction team resulted in the implementation of modified modern slavery checks during both first and second-line reviews.

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

In 2024, we reviewed and updated our Group-wide ethical audit to ensure it effectively addresses evolving supply chain risks. This revised audit was deployed to existing suppliers upon their reassessment and used for onboarding new own-brand suppliers. Furthermore, we expanded our Online Risk Assessment (ORA) to the next phase of suppliers, based on risk, resulting in our supplier assessment program now covering 90% of the Group’s product-for-resale spend.

### Assessment of GNFR suppliers and service providers

The Group’s GNFR ORA, alongside an internal assessment, was extended to additional suppliers on a risk-basis across all businesses and Group functions, covering 54% of the Group spend on GNFR by the end of 2024.

### Industry collaboration

The Group Lead for Modern Slavery collaborated with the Supply Chain Sustainability School to enhance industry practices and our own controls, demonstrated in 2024 by the co-creation with the industry of an operational toolkit to combat labour exploitation.

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

Modern slavery training continued to be rolled out to all colleagues to raise awareness of modern slavery and how to raise concerns. Additionally, the Group Lead supported supply chain knowledge sharing by presenting at the Built Environment Against Slavery Conference in October 2024.

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

Our supply chain risk assessment approach underwent a review, the findings of which will refine our future risk assessment strategies and guide the prioritisation of subsequent initiatives.

## Focus for 2025

### Continue to evolve the scope of the Group’s supplier assessment programme

The company will continue to expand the proportion of Group spend subject to supplier assessments across both GFR and GNFR suppliers, prioritising those with higher risk profiles. This strategic expansion will directly enhance the modern slavery risk mitigation strategies within our supply chains.

### Ethical Site Audits Alignment

To ensure our ethical audit remains aligned with industry best practice, we will review our scoring and grading matrix in light of the Sedex Members Ethical Trade Audit (SMETA) 7.0 update. This process will involve benchmarking our current practices against the new standards to enable alignment. This will strengthen our internal controls and also equip our suppliers with the necessary understanding to confidently navigate external SMETA 7.0 audits.

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

Mandatory modern slavery training will continue to be rolled out to all colleagues, to maintain awareness of modern slavery and how to raise concern.

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 13th March 2025 on behalf of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2024.

**Duncan Cooper, Chief Financial Officer**  
Travis Perkins plc  
13th March 2025