



Modern Slavery

Transparency Statement 2025

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 2025. 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 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. In 2025, there were 17,302 colleagues in the Group and over 1,400 branches and we generated £4.5 billion revenue. The Group's key brands include Travis Perkins, Toolstation, BSS, Keyline, CCF, Benchmarx, TP Hire and TF Solutions. All Group subsidiaries with a turnover of £36 million or more in 2025 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. For further detail on the business structure and the business model, please see [Travis Perkins plc Group Businesses](#).

The Group's businesses have complex supply chains, sourcing products predominantly in the UK but with extended supply chains that stretch around the world. While we have strong oversight of our direct (Tier 1) suppliers, we acknowledge that our visibility of the lower tiers of our supply chain remains a key area for development. However, we maintain significantly greater transparency in two key areas: timber products, where we operate strict chain of custody systems, and our own-brand products, where our direct audit programme provides visibility of manufacturing sites.

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 2025, 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, TSE Netherlands BV & Staircraft Group Limited (included for the period of ownership until 1st May 2025).





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). 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, operating on the principle that no worker should pay for a job. 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 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 2025.

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 annually, 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. Our risk identification process is further validated through insights shared through engagement with the Supply Chain Sustainability School's Built Environment Against Slavery Group.

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 the most 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.

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 2025, 337 suppliers submitted ORAs, a mixture of suppliers completing their initial assessment and those due for reassessment. In total, 1,259 suppliers have been engaged in the ORA programme during 2025 whether for submissions or non-conformance mitigation. Audits continued across manufacturing sites, and in 2025, 228 factory audit gradings were completed. The Group's supplier assessment programme accounts for in excess of 92% of total Group spend on products for resale.

The findings from our supplier assessment programme actively influence our supply chain decision-making; specifically, assessment data is used to determine the continuity of commercial relationships. 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.

Additionally, over 96% of Group timber spend in 2025 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.33). 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. 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 a selection of additional suppliers in 2025.



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. 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 2025.

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 to ensure 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 2025, the mandatory bite-sized training on modern slavery red flags and reporting 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, 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

Training highlights 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 UK colleagues in higher-risk roles - 86% complete

An updated, detailed mandatory modern slavery training module for higher-risk colleagues, 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 Built Environment Against Slavery 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.

Identified incidents

No incidents of modern slavery were identified in our own business or our supply chains during 2025.

²Toolstation Europe businesses follow their own recruitment policies to comply with local laws.



Progress in 2025

Besides the continued evolution of our existing due diligence programmes (see the “Due diligence” section), we set out to improve in key areas during 2025. Progress made is summarised below.

Evolving the scope of the Group’s supplier assessment programme

The Group supplier assessment programme was expanded, with Online Risk Assessments and ethical audits now covering in excess of 92% of Group GFR spend (was 90% in 2024, 85% in 2023). This strategic expansion to suppliers with higher risk profiles will directly enhance the modern slavery risk mitigation strategies within our supply chains.

Ethical Site Audit Alignment

To ensure our ethical audit remains aligned with industry best practice, our scoring and grading matrix was reviewed and updated in light of the Sedex Members Ethical Trade Audit (SMETA) 7.0 update. This involved benchmarking our current practices against the new standards, which has strengthened our internal controls.

Training and awareness within our business and supply chain

Mandatory modern slavery training continued to be rolled out to all colleagues, with colleagues completing in excess of 17,000 training modules during 2025, maintaining awareness of modern slavery and how to raise concerns.

Modernisation of Supplier Governance

A comprehensive review and update of the Group Supplier Manual and Supplier Commitments was completed. These refreshed standards explicitly define the approach to modern slavery and were formally issued to all centrally controlled suppliers to ensure clarity regarding evolving social and ethical expectations.

Focus for 2026

Enhancing Controls for Temporary Labour

A targeted review of temporary labour controls across the Group’s Distribution Centres (DCs) will be conducted. This initiative aims to facilitate the sharing of internal best practices and ensure consistent, robust oversight of third-party labour providers across all logistics operations.

Review of Colleague Training Materials

A review of the mandatory modern slavery training modules, originally deployed in 2023, to ensure content remains current and aligned with evolving risks. This update will support continued internal awareness and clarify the appropriate pathways for reporting concerns.

Evaluating Supply Chain Visibility Beyond Tier 1

Following a trial of a technology-led mapping solution for select categories at the end of 2025, the Group will review the outputs of this pilot in 2026. This evaluation will help inform the future approach to supply chain transparency and assist in developing a deeper understanding of how inherent risks beyond Tier 1 can be effectively monitored.

Strategic Expansion of Supplier Assessments

The evolution of the Group’s supplier assessment programme will continue as a core workstream. Efforts will remain focused on refining risk mitigation strategies and expanding oversight into higher-risk procurement categories to further strengthen supply chain resilience.

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 12th March 2026 on behalf of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2025.

Gavin Stark, Chief Executive Officer

Travis Perkins plc
12th March 2026