

Modern Slavery

Transparency Statement 2018

Highbourne Group Limited (known as City Plumbing Supplies Limited) was part of Travis Perkins plc Group in 2018.

The statement below was approved by the board of Travis Perkins plc and its relevant subsidiaries in relation to the financial period ending 31st December 2018.



MODERN SLAVERY

Transparency Statement 2018

This statement has been produced in accordance with the Modern Slavery Act 2015, section 54(i). It constitutes our Modern Slavery Transparency Statement for Travis Perkins plc and its relevant group subsidiaries for the financial year ending 31st December 2018. Travis Perkins plc¹ and its subsidiary companies are referred to as the Travis Perkins 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.

We base our approach to business on our five cornerstones keeping people safe, upholding family values, working for our customers, being the best and making decent returns. We communicate these both to our colleagues and suppliers as we believe it is what makes us different from our competitors. The cornerstones come down to doing the “right thing” which is how we have approached the issue of modern slavery internally with colleagues and with our suppliers.

Our businesses and our supply chains

Travis Perkins Group is the largest distributor of building materials to both consumers and the trade in the UK. We have over 20 business units operating within the UK, with complex supply chains sourcing products from around the world. Our businesses include well-known brands such as Travis Perkins, Benchmarx, BSS, Keyline, City Plumbing, PTS, Wickes, Toolstation and Tile Giant. For further detail on the business structure, please see p.4-5 of the Annual Report & Accounts 2018 .

We deliver products direct to customers via our own distribution channels and direct from our suppliers, and to customers via our network of approximately 2,000 stores and trade 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 being a responsible business. We continually strive to work with suppliers who share the same values. Since 2008 we have published clear supplier expectations and worked with our suppliers to uphold them. Updated in 2015, our ‘Supplier Commitments’ detail our requirements around environmental and social behaviours in our supply chain. Specific guidance is provided on modern slavery.

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 on the following page, includes an assessment against the requirements of the Supplier Commitments.

Regarding our own employees, we uphold high standards and comply fully with the relevant employment laws for the countries within which we operate. We have clear standards of conduct which are included in our employee handbook. Our employees have access to a whistleblowing line and are encouraged to report any concerns. No reports were registered in 2018 relating to modern slavery.

¹For 2018, this included all relevant, active subsidiary companies according to the requirements of the Modern Slavery Act 2015: Travis Perkins plc, Travis Perkins Trading Company Limited, Wickes Building Supplies Limited, City Plumbing Supplies Holdings Limited, Keyline Builders Merchants Limited, CCF Limited, Travis Perkins P&H Holdings Limited, Primaflow Limited, Connections (AML) Limited, Toolstation Limited, Benchmarx Kitchens and Joinery Limited, Tile Giant Limited, PTS Group Limited, Rudridge Limited.



Due diligence and supplier performance

Our centrally-controlled suppliers go through a due diligence process, which includes two 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 the commitments through our Online Risk Assessment (ORA) questionnaire. 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 a bespoke risk assessment for their company in the 3 key areas of Environmental Responsibility, Social Responsibility, and Quality & Product. Based on the results, our QA team may contact them to request further documentary evidence or undertake additional tasks to demonstrate compliance or mitigate risk. There are cases where a supplier account has been closed based on their ORA results although this has not been for reasons relating to modern slavery.

A third stage of assessment is in place for manufacturers of our own-brand (or no-brand, i.e. commodity) products; an audit programme. For a factory to be approved to manufacture on our behalf they need to pass an audit (which contains both technical and ethical components), conducted either by our QA team or our nominated 3rd party, Intertek. We work with our manufacturers to ensure that any major non-compliances are addressed before any further activity is undertaken with them. These three stages of assessment form our minimum expectation around supplier due diligence and work is ongoing to bring all Group businesses and all suppliers under this framework.

Additionally, over 97% of timber and timber fibre products purchased by the Group in 2018 were certified as responsibly sourced (76% FSC and 21% PEFC). 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.

Risk areas and capacity building

Due to the complexity of our global operations, including the UK, we acknowledge that there may be a risk of modern slavery in our supply chain. Our risk assessment is informed by the Global Slavery Index, the Corruption Perceptions Index and the Worldwide Governance Indicators (WGI) - World Bank.

We have provided training to key employees on modern slavery, including the QA team and our direct sourcing team. We have developed a modern slavery training module on our in-house training system which is accessible to all.

Progress in 2018

Besides the continued management of our existing due diligence programmes (see the "Due diligence" section above), in our 2017 statement we set out our aim to improve in four key areas. The progress made does not align directly with the specific actions listed in 2017 due to reorganisation during the year. However our core due diligence processes continued and progress made within the four key areas is summarised below:

Training & Capacity Building

- QA team members received training on ethical auditing from Intertek, an industry leading Total Quality Assurance provider.

Partnerships & Communications

- Ongoing communication on the Supplier Commitments across our businesses and direct sourcing offices.
- Continued Gold Membership of the Sustainable Supply Chain School; a collaborative organisation which brings together clients, contractors and suppliers to address environmental and social issues in the construction industry.

Policies & Systems

- The Group whistleblowing procedure was reviewed in 2018 and assessed as fit for purpose. There have been no whistleblowing reports related to modern slavery during 2018.

Audit Programme & Due Diligence

- A full review was completed by the Group Director of QA of current QA and responsible sourcing processes, procedures and resources. A new factory audit survey was drafted, with enhanced ethical audit content, which will be finalised in 2019.

Focus for 2019

Training & Capacity Building

- We appointed a new Head of Sustainability in June 2019 who will, as part of their role, lead on our efforts in tackling modern slavery and bring consistency to our approach across the businesses.

Risk Assessment

- We will revisit our risk assessment process to ensure that our mitigation efforts are applied most effectively.

Performance measurement

- Whilst we have been monitoring progress in our due diligence programme, we have not yet set specific KPIs. We will set appropriate KPIs during 2019.

Partnerships & Communications

- We will continue to support the Sustainable Supply Chain School and attend events by expert industry bodies to remain informed on best practice in tackling modern slavery.

Policies & Systems

- We will finalise an enhanced own-brand factory audit survey.

John Carter

Chief Executive
Travis Perkins PLC

June 2019