



# MODERN SLAVERY STATEMENT

31<sup>st</sup> January 2024



# Introduction

Since we joined the STARK Group on 28 February 2023, we've changed our financial year. This means, in accordance with the Modern Slavery Act 2015, we will publish our next Modern Slavery Statement after 31 July 2024.

Our integration into STARK Group and the separation from Saint-Gobain is complete and we can now fully embrace being part of STARK Group and all the opportunities that brings to the UK business.

The strength and scale of STARK Group means we can source products internationally and competitively, so our customers benefit and are able to build value in their local community. With that comes a responsibility to ensure our Supplier Code of Conduct is actively adopted by all partners involved in the supply chain.

We know that the construction industry is one of the most vulnerable sectors when it comes to the threat of human trafficking and modern slavery, and as STARK Group, we take our responsibility seriously to raise awareness, influence the supply chain and take action when required.



John Carter  
Chief Executive  
STARK Building Materials UK Ltd

# Our businesses

STARK Building Materials UK is one of the nation's group of leading builders' merchants, providing professional tradespeople with the products and services they need to grow their own business. Served from hundreds of dedicated branches and distribution centres across Britain, building and construction customers benefit from the specialist materials and expertise provided by an integrated network of dedicated local and regional teams.

The company meets the needs of customers across the building and construction industry. From household names such as Jewson, which helps the best small and medium builders in town, to customers being supported by JP Corry in Northern Ireland and Normans in Jersey, to specialist business customers being served by Minster, Jewson Partnership Solutions, Major Build Solutions, Jewson Civils Frazer and International Timber, the STARK Building Materials UK teams operate within our values of decency, passion and pride.



# Our supply chains

The products we source are available thanks to the efforts of a vast number of people working within the mining, forestry and manufacturing industries. When STARK sources products, we take ethical concerns and human rights into consideration, supporting safe and decent working conditions along the supply chain.

We also partner with a number of goods and service providers who support the running of our branches and offices, where we are equally conscious of our need to consider modern slavery risks.

# Our workforce

With around 8,000 colleagues in our UK organisation, we value the diversity of people, skills and abilities across our business and believe that being inclusive supports the growth of our business:

- We recruit and promote people based on their ability, contribution and potential.
- We are committed to promoting, supporting and maintaining a culture of fairness, respect, and equal opportunity for all.
- We are committed to fair employment practices and comply with national legal requirements regarding wages, overtime hours, mandated benefits and working hours.
- We provide a safe working environment for everyone. We reinforce good safety management practices and maintain awareness of safe ways of working.
- We treat people fairly and do not tolerate bullying and harassment.
- We do not discriminate for reasons such as age, gender, sexual orientation, marital status, race, colour, ethnicity, disability, religion, political affiliation or union membership.
- We do not use forced, bonded, or indentured labour or involuntary prison labour or take part in human trafficking.
- We do not use child labour.

# Policies

We have a number of policies which support our commitments against Modern Slavery:

- [Code of Conduct for colleagues](#)
  - The Code of Conduct is our way of doing good business responsibly
- [Supplier Code of Conduct](#)
  - Zero tolerance approach to any form of child labour and modern slavery
- [Speak Up Whistleblowing system](#) and [Policy](#)
  - We have had no reported cases of modern slavery via Speak Up in the UK since joining STARK Group
- [Human Rights Policy](#)
  - We are committed to respecting fundamental human and labour rights throughout our activities across our value chain
- [People Policy](#)
  - We are committed to respecting fundamental human and labour rights within our operations and through collaboration with our value chain
- [Anti-Corruption Policy](#)
  - We expect our suppliers and other business partners to be committed to work against corruption and to have ethical standards similar to ours
- [Responsible Timber Policy](#)
  - We expect our suppliers to share our ambitions and work to measure and reduce their ecological and carbon footprint and improve labour conditions throughout their operations
- [Product Integrity Policy](#)
  - We wish to play an instrumental role in upholding environmental and human rights standards across our value chains and promoting positive change within the communities around us
- [Sustainability Policy](#)
  - We are committed across our supply chain, to respect and comply with international labour standards

# Governance

Overall accountability for modern slavery within our operations sits with the UK Executive Board, chaired by Chief Executive, John Carter.

The 2024 Modern Slavery road map includes the inception of a Modern Slavery Working Group which will include representatives from functions such as Purchasing, Human Resources, Legal, Compliance, Sustainability and Communications. The team will be responsible for planning and implementing our Modern Slavery programme for the year ahead.

# Training

During 2023 we transitioned to a new e-learning system under STARK Group. Modern Slavery training is available to all colleagues and raises awareness in spotting the signs of modern slavery.

During 2024, we will ensure the training is mandatory for all colleagues, as we recognise our drivers and warehouse colleagues are as likely to spot signs of modern slavery as colleagues in other parts of the business. For colleagues involved in specific roles, such as Purchasing and Supply Chain, we want to develop a training pathway which provides a much deeper understanding of Modern Slavery.

# Risk assessment

Our top 500 suppliers, which account for £1.5bn or 75% of cost of goods for resale, have signed up to Terms of Purchase which include clauses on responsible purchasing and modern slavery. As contracts are renewed, we are taking the opportunity to transition to STARK specific terms which include reference to STARK policies.

The Terms of Purchase ensure a contractual commitment to comply with our Supplier Code of Conduct and other policies including Responsible Purchasing Policy, Product Integrity Policy, Trade Compliance and Sanctions Policy and Human Rights Policy.

We have been working closely with STARK Group Sourcing team to understand the methodology used for assessing supplier risks. The [STARK Group Sustainability Report 2023](#) provides more information.

Key highlights for the Group in 2022/23 include publication of many ESG related policies (including those mentioned above) and the implementation of new supply chain due diligence processes. During 2024 we aim to adopt these Group processes with targeted suppliers which will include using a third party ESG screening tool to assess financial and ESG risks. This will provide a basis from which we can decide our audit approach. Existing routines will also remain in place, such as close monitoring of suppliers in high risk areas, determined by product and/or location (such as Indian sandstone) to ensure ethical business practices.

Goods not for resale negotiations include an assessment of modern slavery risks. In 2024, all new contracts will also be subject to the above mentioned screening tool.

# Commitments/Certifications

STARK Group uses the UN Guiding Principles on Business and Human Rights and international labour standards as defined by the International Labour Organisation. The [STARK Group Sustainability Report 2023](#) provides more information.

STARK Building Materials UK is a member of the Supply Chain Sustainability School which supports us with valuable resources on Modern Slavery.



## ECOVADIS PLATINUM

For the second straight year, STARK Group secured the highest distinction, a platinum rating, in Ecovadis' global sustainability assessment, thus maintaining its position among the top 1% of more than 100,000 assessed companies globally. STARK Group's performance within the themes of environment, labour and human rights, ethics and sustainable procurement has been evaluated and rated at an overall score of 85/100, a 7-point improvement from the previous year.



# OUR VALUES



## DECENCY

### **We act with decency towards customers, colleagues, suppliers, and partners**

In everything we do, we aim to earn trust. Trust requires integrity, and integrity requires decency. As a market leader, the success of our customers is always at the forefront of our daily activities. It is only by being fully committed to our dealings with customers, colleagues, suppliers, and partners, that we earn the right to be the most trusted builders' merchant.



## PASSION

### **We care deeply about people and society**

We are driven by people with a passion for our customers, partners, and our business. People who go out of their way to help build success for others and for society as a whole. With enquiring minds and easy smiles, we encourage each other to be better every day, and we celebrate our accomplishments together.



## PRIDE

### **We take pride in delivering what we promise**

We have come a long way since our beginning in 1896. Today, we are grateful to have earned our position as a market leader. We take pride in delivering on our promises to customers, colleagues, suppliers and partners every day, and continue our efforts to remain trustworthy as we build our future and welcome new colleagues on board.