



# MODERN SLAVERY STATEMENT

Financial year ending 31<sup>st</sup> July 2024



# Introduction

At STARK UK Building Materials Ltd, we believe it is a fundamental business principle that our colleagues have a safe and positive environment to do their jobs to the best of their ability. Our company values – Decency, Passion, and Pride – underpin that commitment, and we also believe it is essential to have confidence that our partners throughout our supply chain are aligned with robust governance that can withstand scrutiny. As part of our commitment to a safe working environment and an end-to-end supply chain, STARK UK has protocols in place to help mitigate and minimise the risk of modern-day slavery.

That is why we are pleased to have entered into a partnership with Stronger Together, who are well-placed to support us in fulfilling our commitment to tackling modern-day slavery. This partnership will also help our supplier partners and local communities address this critical issue. The construction industry is particularly susceptible to the risks of modern-day slavery, which is why we believe it is vital to take a stand and drive change across the sector.

John Carter  
Chief Executive Officer  
STARK Building Materials UK Ltd



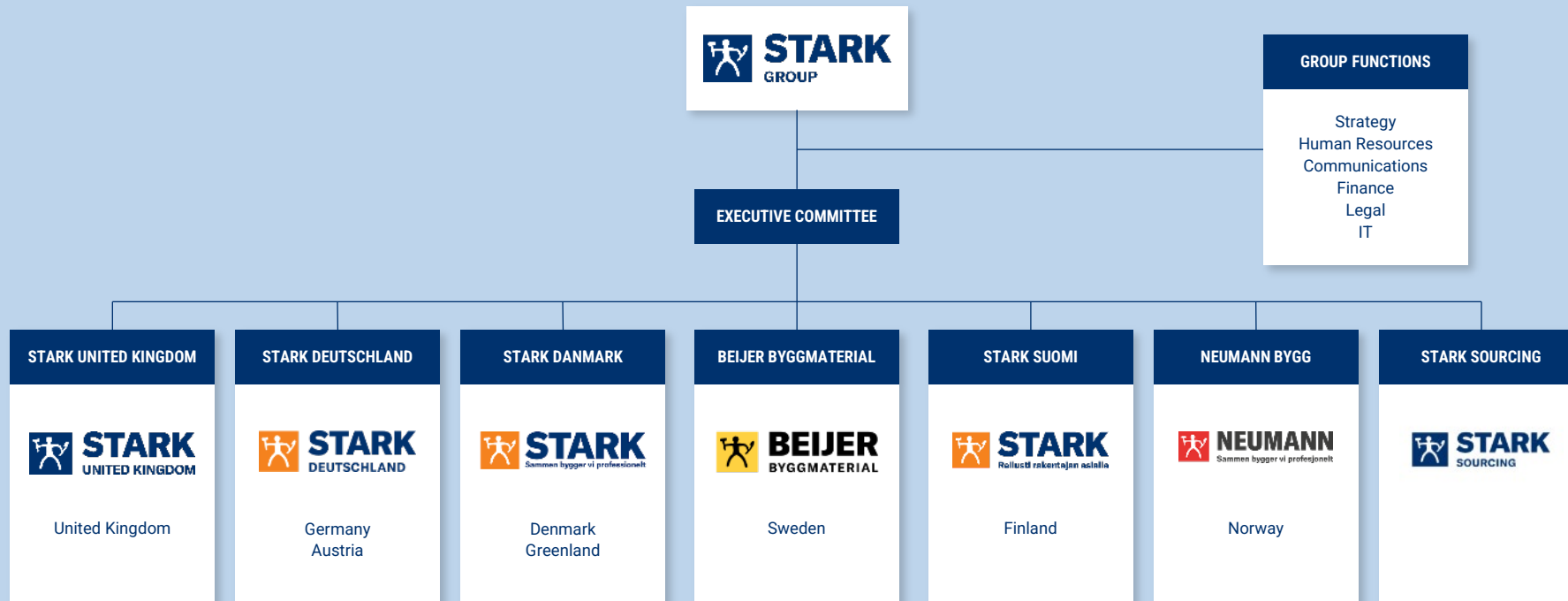
31<sup>st</sup> January 2025



# Our group

STARK Group is Europe's largest building materials distributor, with a vision to be the most trusted business-to-business distributor of heavy building materials in Europe. It operates 1,150 branches and distribution centres across Europe through its subsidiaries, including STARK Building Materials UK Ltd (STARK UK).

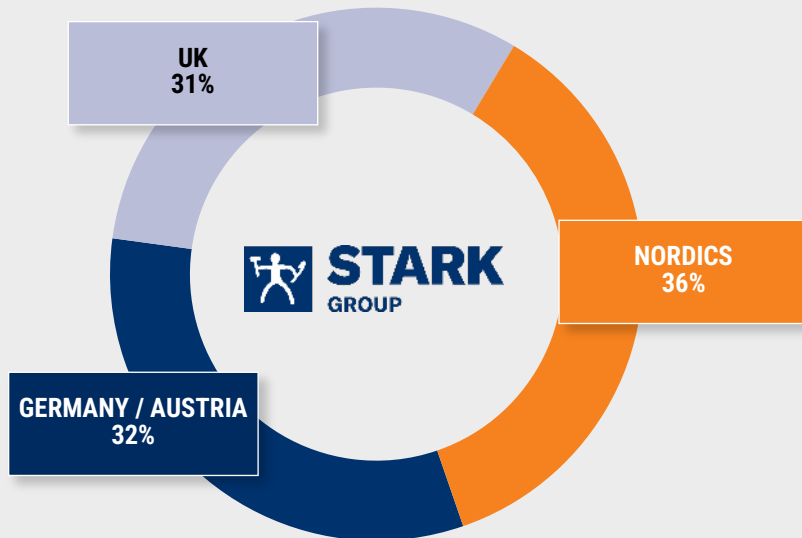
Each business unit is decentralised, with its own autonomous, national management team. All STARK Group business units are chain concepts, with products and services visibly marketed under a single name in the market in which they operate.



# STARK Group

PERFORMANCE / COMPANY STATS

GROUP REVENUE OF €7.8BN IN FY24



**1896**  
FOUNDED



**20,000+**  
EMPLOYEES



**€7.8BN**  
REVENUE



**300,000+**  
CUSTOMERS



**1,150**  
BRANCHES AND  
DISTRIBUTION CENTRES

# Our UK businesses

With more than 500 dedicated builders' merchant branches and distribution centres, STARK UK is one of the nation's largest retailers and distributors of building and construction materials.

Our dedicated team provides expert advice, a trusted service, and the highest product quality available. Through a growing network of strategically located supply chain hubs, we provide market-leading solutions and services with a hassle-free experience. So, every customer across the UK can get the sustainable solutions they need to build responsibly for the future.



# 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. In the UK, we have over 5,000 tier one suppliers providing goods for resale and representing over £1.8bn spend. 135 of those suppliers make up 80% of the spend.

With an annual spend of around £250m, we also partner with around 1,400 tier one goods and services providers who support the running of our branches and offices, where we are equally conscious of our need to consider modern slavery risks. 63 suppliers make up 80% of the spend.



# Our workforce

With over 7,000 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 of any kind
- 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 prohibit the use of child labour, forced, bonded, or indentured labour or involuntary prison labour and prohibit participation in human trafficking
- We promote the use of Speak Up.



# Our governance

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

General Counsel has executive responsibility for the Modern Slavery Working Group, which is represented by colleagues from functions such as Purchasing, Human Resources, Legal, Compliance, Sustainability and Communications. The team is responsible for planning and implementing our Modern Slavery programme for the year ahead.

# Our training

During 2024, we developed a new Modern Slavery mandatory e-learning module. This was launched to all colleagues on Anti-Slavery day in October and is also a mandatory element of new starter inductions. 78% of colleagues have completed the training to date.

In 2025, the subject of modern slavery will feature in our employee engagement programme. For colleagues involved in specific roles, such as Purchasing, we will develop a training pathway which provides a much deeper understanding of Modern Slavery. Anti-Slavery Day 2025 will be another great opportunity to raise awareness with colleagues.

Our partnership with Stronger Together will provide an opportunity for us to support our suppliers with training needs in 2025. The issue of Modern Slavery was included in our Supplier Conference in January 2025.



# Our 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

# Our commitments

STARK Group participates in the UN Global Compact and is committed to the Ten Principles. This means we operate in ways, that as a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. The [STARK Group Sustainability Report](#) provides more information.



**stronger  
together**

Responsible recruitment | Fair work | Free from exploitation

STARK UK is sponsoring the Stronger Together Construction & Property Programme in 2025. Stronger Together are an impact driven, not for profit organisation that provide businesses with practical training, resources, business services and collaborative programmes

STARK UK is a partner of the Supply Chain Sustainability School. The School is a collaboration between clients, contractors and suppliers who have a mutual interest in building the skills of their supply chain. Our gold membership reflects our level of engagement with the School.



Excellence in building  
materials supply

We are proud to be members of the Builders Merchant Federation, the trade association that represents builders' merchants and manufacturers of building materials in the UK. We are active members of the sustainability working group and work across a number of initiatives to support members become more environmentally and socially responsible.

# Our certifications



STARK Group is rated annually by EcoVadis, a highly recognised and widely used external ESG rating system. We are proud to have achieved Platinum rating for 4 consecutive years.

We are an important player in the timber industry. This is why we are committed to acting ethically and responsibly along the value chain to preserve forests, the local populations living there and biodiversity. We wish to make a positive contribution with all the people involved in the supply chain to develop ethically, environmentally and socially secure supply chains.

In 2024 over 85% of timber spend in STARK UK had responsible sourcing certification (80% FSC® and 20% PEFC).

Both the FSC® and PEFC Chain of Custody certification schemes integrate the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998), which includes the abolition of child labour and the elimination of forced or compulsory labour.



# Our risk assessments

We ask our top 500 suppliers, which account for £1.7bn or 93% of cost of goods for resale, have signed up to Terms & Conditions of Purchase which include clauses on responsible purchasing and modern slavery.

These terms ensure a contractual commitment to comply with our Supplier Code of Conduct and other policies including Human Rights Policy, Responsible Timber Policy, Product Integrity Policy and Trade Compliance and Sanctions Policy.

We have worked closely with STARK Group Sourcing team to understand the methodology used for assessing supplier risks. The [STARK Group Sustainability Report 2024](#) provides more information.

A key highlight for the Group in 2023/24 included establishing a dedicated Sustainable Supply Chain Manager in STARK Group Sourcing. This new role plays an instrumental part in further developing our environmental and human rights due diligence processes and educating the organisation in sustainable supply chain management.

In 2024 we adopted the use of a third party screening tool to assess financial, political and ESG risks and we commenced the targeted screening of the above-mentioned top 500 suppliers. During 2025 the Group aims to roll out a broader supply chain risk management due diligence process, and this will provide the basis from which we prioritise our audit approach. Existing routines will also remain in place, such as close monitoring of suppliers in high-risk areas, determined by product, activity and/or location (such as Indian sandstone) to ensure ethical business practices.

A new team has been established which is responsible for procurement of goods and services not for resale. Existing processes will be reviewed in 2025 and the feasibility of introducing the due diligence approach used for goods for resale will be assessed.

# Our progress

In 2024, we:

- Successfully established a Modern Slavery Working Group and held regular meetings
- Provided Modern Slavery resources and information for all STARK UK colleagues
- Developed and launched a new mandatory colleague Modern Slavery training module and achieved 78% completion in less than 3 months
- Finalised sponsorship of the Stronger Together Construction & Property Programme
- Collaborated with STARK Group in the approach to supplier due diligence and risk assessment
- Established a new team responsible for the tendering and supplier selection process for goods not for resale; and
- Continued our progress on moving our top 500 goods for resale suppliers onto STARK's Terms & Conditions of Purchase which include commitments to modern slavery and responsible purchasing clauses.

In 2025, our priorities are to:

- Regularly report to the Executive Board on KPIs and modern slavery activities
- Share news of the Stronger Together sponsorship with colleagues, suppliers and customers and use this as a catalyst for a programme of events to raise awareness
- Maximise the completion of mandatory colleague training and provide more detailed training via Stronger Together to colleagues where it is more relevant to their role
- Introduce modern slavery training requirements into our goods for resale tender process and provide funded training post contract to prioritised suppliers
- Implement the Group-wide system to support supplier due diligence and risk assessment for goods for resale
- Review existing processes for goods not for resale and assess feasibility of using the Group-wide system to risk assess.

# OUR VALUES

Our core values reflect what we stand for and help our customers and partners understand and appreciate what it means to do business with us.



## DECENCY

**We act with decency towards customers, colleagues, 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 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 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 and partners every day, and continue our efforts to remain trustworthy as we build our future and welcome new colleagues on board.

STARK Group's purpose and values are decency, passion and pride – principles that we can all aspire to and live up to in our daily work. How we articulate them for our respective brands may look different, to reflect our local market conditions or specific business team cultures, etc. but the essence remains the same.