



# STARK UK MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDING 31<sup>ST</sup> JULY 2025

STARK UK

# EXECUTIVE STATEMENT

We've had a positive first year in supporting Stronger Together. Our people are now far more aware of and better understand the risks of modern slavery – what to look out for and what to do if they're concerned.

Sponsoring Stronger Together allowed us to offer free training to our tier one suppliers. We hope to see a greater uptake in this coming year, as it's important for us to work together to reduce the very real risks of modern slavery that exist in the building and construction industry.

In 2025, STARK Group established a new Sustainable Sourcing Team and introduced 'amfori' a supply chain risk management organisation to support a more structured approach to the way we govern our work and collaborate with suppliers, including those with higher risk profiles.

We will always look for ways to improve our approach and reduce risk. Our company values of decency, passion and pride guide all that we do, not least in our fight against modern slavery.

John Carter  
Chief Executive Officer  
STARK Building Materials UK Ltd  
31<sup>st</sup> January 2026



PURPOSE

**WE BUILD OUR FUTURE BY HELPING OTHERS BUILD THEIRS**

MISSION

**WE USE OUR UNITED STRENGTH TO BUILD LOCAL VALUE**

VISION

**THE MOST TRUSTED BUSINESS-TO-BUSINESS DISTRIBUTOR OF HEAVY BUILDING MATERIALS IN EUROPE**

OUR CORE VALUES



**DECENCY**

We act with decency towards customers, colleagues and partners



**PASSION**

We care deeply about people and society



**PRIDE**

We take pride in delivering what we promise

STARK GROUP

Branches and distribution centres

**1,050**

Suppliers

**15,000**

Colleagues

**18,500**

Tradespeople

**450,000+**

# OUR BRANDS

STARK Building Materials UK Ltd (STARK UK) is a leading builders' merchant and distributor of materials to professional tradespeople across the nation. We're part of STARK Group, the industry leader in Europe, and represent 32% of group net sales.

Our ambition is to be #1 in the eyes of our colleagues, customers and the local communities we serve.

With more than 500 branches and distribution centres, our businesses offer customers solutions, expertise and advice that are relevant for the dynamic markets we operate in.

We operate at the heart of local communities, and do so with decency, passion and pride – our company values shape what we do and how we show up at work every day.



'Proud to partner the trades', providing products, services and expertise to small and medium general builders and tradespeople



One of Northern Ireland's leading builders' merchants, serving both public and trade customers



Delivering essential support to major building projects



Providing a fully comprehensive range of products and materials to the building industry in Jersey



Helping housing providers to efficiently maintain and develop their property networks



A specialist timber product provider, delivering nationwide



'Proud to be the trusted partner construction professionals rely on', for specialist dry-lining projects



Core to the Jewson offering, helping customers save time and money



A leading provider of specialist civils, infrastructure and utilities products and solutions



'Your project, our expertise' – Helping customers plan projects with ease and saving them time

# SUPPLY CHAINS

Our operations encompass the strategic sourcing, marketing, sales and distribution of products for the construction industry.

We play a crucial role in connecting manufacturers with professional tradespeople. We purchase items for resale from established brands and also supply own brand goods. Own brand products play a key part of our sourcing strategy, aiming to simplify work for professional tradespeople by providing distinctive alternatives to popular consumer brands.

We continually review and enhance our supplier requirements and due diligence processes to ensure that our supply chains reflect our commitment to human rights and decent working conditions.

Within the UK, we partner with more than 4,100 tier one suppliers who provide resale goods, representing over £1.8 billion in spending. 127 of these suppliers account for 80% of our total expenditure.

We also spend around £340 million annually with approximately 3,000 tier one suppliers on goods and services not for resale. 109 suppliers make up 80% of the spending.



STARK GROUP

## OUR ROLE IN THE MARKET



# COLLEAGUES

STARK Group operates in countries with some of the highest global standards for human rights protection, as reported by the Human Rights Index from Our World in Data. As such, the inherent risk of human rights violations in our own operations is considered low, especially when coupled with our internal governance systems.

Our UK workforce consists of around 6,900 colleagues. We recognise and celebrate the wide range of backgrounds, expertise and talents within our organisation and take steps to ensure everyone is safe, treated fairly and legally.

We have very established values of Decency, Passion and Pride which are communicated widely and form the basis of our Colleague Code of Conduct.

Our colleagues share their views anonymously through an annual engagement survey operated by an independent third party. It includes key areas of interest including working conditions, job purpose, career development and fair treatment. The results are analysed at all levels of the business, shared with colleagues and actions implemented to improve the colleague experience.

We also operate a Speak Up system which can be accessed anonymously through an app, website or telephone line. The system is well promoted and most often accessed through the app. We have had no cases relating to Modern Slavery during the period.

# TRAINING & AWARENESS

In January 2025 we launched our sponsorship of Stronger Together's Construction & Property programme at our annual Supplier Conference, which was attended by around 135 goods for resale suppliers. Stronger Together's CEO presented at the conference describing key risks within the sector and had an exhibition stand to encourage further engagement. Our sponsorship enabled free training for these suppliers which was attended by 11 companies. The same offer will be available during 2026 due to our continuation of the Stronger Together sponsorship.

During September 2025, we trained 25 procurement and supply chain colleagues including all Category Directors, Category Managers and some Category Assistants. Delivered face to face, this training was provided by Stronger Together and was specifically aimed at the Construction sector. We aim to repeat this during 2026 for procurement/supply chain new starters alongside a broader range of personnel.

Awareness was raised on anti-slavery day externally through STARK UK's social media channels and our involvement in Stronger Together's social media campaign. Internally communications were shared which included posters for displaying in our branches.

We provide mandatory modern slavery e-learning for all new starters which is repeatable every two years. This was first launched in October 2024, so a large proportion of colleagues will be required to repeat this late 2026. Our current completion rate is 82%.

Face to face training is planned for the UK Executive Committee during February 2026.

# GOVERNANCE

In 2025, STARK established a dedicated Sustainable Sourcing team within Group Sourcing. The team brings together expertise in supply chain sustainability, supplier data and ESG risk assessments, and compliance with the EU Deforestation Regulation and other emerging legislation. They work closely with sourcing and category teams to integrate sustainability into procurement decisions and supplier performance monitoring. For more information see the [STARK Group Annual Report](#), which now incorporates sustainability reporting.

Our decentralised operating model empowers local leadership teams to implement Group-wide policies in ways that reflect local market conditions and regulations.

Overall responsibility for Modern Slavery in STARK UK sits with the UK Executive Committee, chaired by CEO, John Carter.

Executive responsibility for the UK Modern Slavery Working Group is with Nim Cassidy, General Counsel.

The working group has representatives from a number of UK stakeholders across the business including Procurement, HR, Sustainability, Supply Chain, Compliance and Communications. Group Sustainable Sourcing are also represented. The team is responsible for planning and implementing awareness and training activities as well as being the first point of contact.

In future, the STARK UK Modern Slavery Statement will be incorporated into a STARK Group statement.

# POLICIES

Our policies are available on the [STARK Group website](#). They are reviewed annually and approved by STARK Group Executive Committee.

We have several policies which represent our commitment to minimising risks of modern slavery, including:

- **Code of Conduct for colleagues**  
The Code of Conduct is our way of doing good business responsibly, reinforcing a culture of trust and accountability
- **Supplier Code of Conduct**  
Updated in 2025 to align with amfori, it shows STARK's 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. Our commitment is based on core ILO conventions and internationally accepted frameworks from the OECD and the United Nations including the UN Guiding Principles on Business and Human Rights

Other relevant policies available on the website include People Policy, Diversity, Equity & Inclusion Policy, Health & Safety Policy and Anti-Corruption Policy.

Our Sustainability Policies demonstrate our approach to ethical sourcing which include commitments to supply reliable and robust products through supply chains which do not compromise on environmental, social and ethical standards.

# COMMITMENTS



## ECOVADIS

For the fourth year in a row, STARK Group have been awarded an EcoVadis Platinum rating, placing us among the top 1% of companies worldwide



## UN GLOBAL COMPACT

By joining the UN Global Compact, STARK Group becomes part of the world's largest sustainability initiative, with over 10,000 companies and 3,000 organisations in more than 160 countries.



## AMFORI

Through our membership of amfori, we strengthen responsible sourcing practices and support fair, sustainable trade across our global supply chain



## SUPPLY CHAIN SUSTAINABILITY SCHOOL

STARK UK is a partner of the SCSS. The school is a collaboration between clients, contractors and suppliers who have a mutual interest in building the skills of their supply chain



## FSC®

STARK Group are a member of the FSC® Board, we play an active role in advancing responsible forestry and promoting sustainable sourcing globally. STARK UK are FSC certified



## PEFC

Through STARK Group participation in PEFC working groups, we help drive sustainable forest management and responsible sourcing. STARK UK are PEFC certified



## STRONGER TOGETHER

For the second year running, STARK UK is sponsoring Stronger Together's Construction & Property programme which promotes sharing of best practice across businesses as well as providing access to numerous resources

# RISK MANAGEMENT

Our business model depends on a global supply chain, where poor working conditions and low labour standards in certain regions present a risk of human rights violations, such as unsafe environments and failure to respect fundamental labour rights. These risks mainly relate to workers in the upstream value chain, especially those involved in manufacturing and raw material extraction.

We apply a risk-based due diligence approach to proactively identify, assess, and mitigate environmental and human rights risks across our supply chain. We aim to align our processes with international frameworks, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidance for Responsible Business Conduct. Our due diligence practices are embedded in key policies and are supported by our Sustainable Sourcing team.

STARK Group conduct assessments based on country risk as well as category risk assessments as we understand that certain industries including textile and electronics have higher risk of modern slavery including forced labour and child labour. In 2025 we selected strategic product categories and conducted a research-based assessment to identify key sustainability related risks across the value chain. This analysis enabled us to establish a clear understanding of where social and operational risks are most likely to occur, ensuring that these insights are fully embedded in our category strategies.

In 2025, STARK Group invested in a new digital platform called Osapiens to support implementation of EU Deforestation Regulation (EUDR).

STARK Group became a member of amfori in 2025, following which we have updated our Supplier Code of Conduct to align with both the BSCI (Business Social Compliance Initiative) and BEPI (Business Environmental Performance Initiative) Codes of Conduct. This ensures our expectations cover both social and environmental responsibilities across our supplier base. We have begun mapping our existing suppliers to the amfori platform to identify key risks and strengthen oversight. A significant share of our non-EU suppliers are already on the amfori platform with accessible BSCI onsite audits results.

In the UK, we ask our top 550 suppliers, which account for more than 90% of cost of goods for resale to sign up to our Terms and Conditions of Purchase which includes clauses on responsible purchasing and compliance to the STARK Supplier Code of Conduct.

In the UK, the Goods Not For Resale team was established in the prior year and has taken significant steps to strengthen compliance, governance and ethical sourcing across key service provision areas, including waste management, security, cleaning, and both soft and hard facilities management. Enhanced controls have been implemented to ensure the use of approved preferred suppliers who align with corporate policies, UK regulatory requirements, and human rights and modern slavery standards. This structured approach enables deeper due diligence, improved supplier oversight and greater transparency within high-risk sectors, supporting proactive identification, mitigation and monitoring of potential human rights risks across the supply chain.

# ACTIONS

## Highlights from 2025 include:

Sponsorship of Stronger Together's Construction & Property programme

Modern Slavery was on the agenda at the annual supplier conference attended by around 150 tier one suppliers, with Stronger Together presenting on key risks in the Construction sector

Supplier training offered to around 135 suppliers via Stronger Together of which 11 suppliers attended online sessions

Face to face colleague training for 25 procurement and supply chain colleagues, also provided by Stronger Together. Mandatory e-learning for all colleagues reached 82% compliance

Raised awareness on Anti-Slavery day externally via STARK UK social media channels and involvement in Stronger Together's social media campaigns

Internal colleague communications to raise awareness including availability of multi-lingual posters for displaying in our branches

Continued membership with the Supply Chain Sustainability School, where a small number of colleagues accessed resources and received online training

Conducted a targeted modern slavery risk audit across cleaning suppliers, applying enhanced due diligence criteria to assess labour practices, governance controls, and compliance with human rights standards.

Introduction of Group Sustainable Sourcing team, amfori and new Supplier Code of Conduct.

## Key initiatives for 2026 include:

Renewed sponsorship of the Stronger Together Construction & Property programme

Face to face training of the UK Executive Committee

Face to face training for additional procurement and supply chain colleagues who were not previously included and/or new starters plus any colleagues identified as appropriate from other functions within the business

Offer free training to tier one suppliers with a targeted approach based on risk assessment

Raise awareness internally through communication campaigns and e-learning

Rationalise portfolio of suppliers offering recruitment services

Continue to enhance ethical sourcing controls across high-risk and priority soft and hard facilities management service areas

Greater understanding and use of amfori

Use of Osapiens to support EUDR in JP Corry in Northern Ireland

Publish a STARK Group Modern Slavery Statement.