Modern Slavery and Human Trafficking Statement 2022-23

Stax Trade Centres is the UK's largest non-food wholesaler. We provide a wide range of hardware, building, plumbing, houseware and gardening products. We have expanded to include kitchens, bathrooms, workwear, and protective clothing. We operate six, strategically located, UK cash and carry warehouses along with a nationwide delivery service.

Our customer base exceeds 40,000 and focuses entirely on trade customers. These are primarily independent retailers, garden centres, tradespeople, and local authorities. We employ over 550 staff, 50% of whom have been with us for more than ten years.

We take our responsibilities in respect of modern slavery and human trafficking very seriously. We are committed to playing our small part in eradicating this modern-day scourge, which has been described as criminality hidden in plain sight. Government research concluded that it costs the UK economy £4 billion annually.

We present our 2022- 2023 statement as required by section 54 of the Modern Slavery Act 2015. The Board of Stax Trade Centres endorsed this report at its meeting on 14th March 2023.

As Director with responsibility, I am proud to present this public statement of our position. We fully intend this to be a living policy that informs our culture and development, and it will be updated annually. It will always be displayed prominently on our website by hyperlink from the home page.

We have two subsidiary companies, PDS Logistics Ltd and MP Smith and Co. Ltd, which are covered by this statement. PDS Logistics provides a distribution service to the Stax warehouses and a small number of other businesses. MP Smith and Co. Ltd was acquired in 2019. It has been established for over 40 years and specialises in supplying Hardware and D.I.Y. Wholesalers and Pre-packers with builders' and architectural hardware products.

If you wish to ask anything about the content of this statement, I have provided my contact details below and I will be pleased to hear from you.

Our Supply Chain

The nature of our activities means that we rely significantly on our supply chain. Our supply chain is relatively complex. It consists of approximately 700 suppliers based both within and outside the UK. These may be primary suppliers e.g., manufacturing finished goods and materials which we then purchase, or they can be secondary suppliers e.g., they import goods and materials produced by others which we then purchase.

We attempt to ascertain that no goods purchased, or labour used has been subject to slavery, exploitation, coercion, or human trafficking. Our ability to verify the assurances we receive is, of course, limited. However, to date we have not identified any significant risks of modern slavery or human trafficking within our supply chain. We consider our overall risk level to be relatively low.

We work closely with the supplier of our own brand products to develop procedures to reduce the risk of modern slavery.

Our Staff

One of the most important ingredients of a successful business is undoubtedly its staff. As mentioned earlier, over half of our staff have been with us for more than ten years. Some have been with us from our earliest days in the 1980's. We are absolutely committed to providing legally compliant terms and conditions of employment. And we uphold the highest standards in our human resources policies and practices.

To date we have not identified any risks of modern slavery or human trafficking within our own organisation. We operate a legally compliant, planned approach to procurement and payment. We also ensure that our organisation and its staff observe the provisions of the Bribery Act 2010.

We acknowledge that seasonal work can present particular risks; especially where migrant labour is used. This is not a consideration for our organisation: we do not utilise any seasonal workers whatsoever.

We make absolutely minimal use of third-party labour recruiters. Less than two percent of our workforce are agency workers. We check all third-party labour providers to ensure they are legitimate, registered, employment businesses/agencies. We require specific written assurances that anyone they supply has the legal right to work in the UK. Should we discover an infringement, we would remove the worker(s) and review our relationship with that supplier.

We do not sub-contract areas of our activity such as cleaning, catering, or in-store security. We utilise our own staff to fulfil all such functions.

We specifically encourage and support the training and recruitment of young people and those returning to the labour market. We offer workplace experience to schools and colleges. However, we do not employ children of school age. And we do not target children as customers. We therefore have no particular child safeguarding issues.

We ensure that everyone we do engage has the legal right to work in the UK. Our employee handbook reflects our commitment always to employ people in a legally compliant manner. It provides clear guidance to staff on a number of associated issues.

It contains a comprehensive equal opportunities and diversity policy. In respect of employment and promotion, this policy enshrines a modern slavery and human trafficking guarantee. No member of staff is subject to forced labour or coercion: every member of staff enjoys 100% legally compliant employment.

You can view our Equal Opportunities Policy (including recruitment and promotion) here

The handbook also includes measures to tackle bribery and corruption. We also operate specific provisions through which colleagues can confidentially report any concern or "blow the whistle". We have adopted measures to deal with any instances of intimidation, bullying or harassment. And all members of staff have access to our grievance procedure.

You can view our Anti-Bribery provisions here

You can view our Confidential Reporting policy here

You can view our Bullying and Harassment policy here

You can view our Grievance procedure here

Provisions such as these not only reflect our commitment to the highest employment standards; they can also play an important supportive role in our opposition to modern slavery and human trafficking.

This statement was approved by the Board of Directors at the Board Meeting held on 14th March 2023 in Manchester.

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15th March 2023