



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for Year Ended 31 March 2016

Our Policy

DCC plc is opposed to slavery and human trafficking in any part of our activities or our supply chains. The Group is therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

Our Structure

DCC is an international sales, marketing, distribution and business support services group. Our headquarters are in Dublin, Ireland. The Group is listed on the London Stock Exchange and is a constituent of the FTSE 100 Index.

DCC currently has operations in 15 countries and employs over 10,500 people. More information on our four divisions is set out below. Additional information on the DCC Group, including our operating model, is available at www.dcc.ie.

Our Divisions

DCC is organised in four divisions:

1. DCC Energy is the leading oil and liquefied petroleum gas (LPG) sales, marketing and distribution business in Europe. In the year covered by this statement, DCC Energy sold 12.8 billion litres of product to its customer base across six countries in Europe. DCC Energy sources the large majority of the product it sells from oil majors such as Exxon, Shell and BP. DCC Energy purchases very little product from countries where modern forms of slavery are a particular risk.
2. DCC Healthcare is a leading healthcare business, providing products and services to healthcare providers and health & beauty brand owners. DCC Healthcare sells a range of medical and pharmaceutical products to healthcare providers across all sectors of the healthcare market in the UK & Ireland from acute care to community care and general practitioners. In the health & beauty sector, DCC Healthcare builds partnership relationships with international brand owners, providing a range of specialist services including product development, formulation, manufacturing and packaging. DCC Healthcare acts as a distributor for many large pharmaceutical and medical devices businesses such as Baxter Healthcare, BioRad, Mölnycke and Grifolds. Where DCC Healthcare sources materials for use in manufacturing, the suppliers are largely located in the UK and Ireland or in other parts of Europe. DCC

Healthcare sources a modest amount of products from countries where modern forms of slavery are a particular risk.

3. DCC Technology is a leading sales, marketing, distribution and supply chain services business, providing a broad range of technology products and services to customers across Europe. The large majority of the products sold by DCC Technology are purchased from multinational businesses such as Acer, Dell, Lenovo, Microsoft and Samsung. DCC Technology purchases a modest amount of products from countries where modern forms of slavery are a particular risk.
4. DCC Environmental is a leading provider of recycling, waste management and resource recovery services to the industrial, commercial, construction and public sectors in the UK and Ireland. The large majority of the supply chain relationships in DCC Environmental are with businesses in Europe. DCC Environmental sources very few products from countries where modern forms of slavery are a particular risk.

More Detail on Group Businesses

Businesses in the DCC Group that met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the year ended 31 March 2016 will publish separate statements under the Act. Those statements will provide additional detail on their activities, including as to whether any of their work is seasonal, on their supply chains and on the controls they have in place to identify and prevent slavery and human trafficking.

Responsibilities

Responsibility for ensuring that DCC has suitable policies at Group level to identify and prevent slavery and human trafficking rests with the Board. Responsibility for complying with those policies, including through the implementation of more detailed policies and procedures, within individual Group businesses rests with the directors of each business.

DCC Group Policies relevant to Slavery and Human Trafficking

The DCC *Business Conduct Guidelines* set out the Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, the *Guidelines* set out our commitment to fair employment practices.

In addition, the DCC *Supply Chain Integrity Policy* sets out the approach to be taken by every business in the Group to ensure that the products they sell and the suppliers they appoint meet applicable legal and ethical standards, including minimum labour standards. Among other things, this Policy requires Group businesses to consider the risk of slavery or human trafficking arising in the countries where their suppliers are located. Having conducted this risk assessment, the Policy requires Group businesses to conduct suitable due diligence and to put in place controls to prevent slavery and human trafficking.

We actively support employees of Group businesses in raising concerns (whistleblowing) if they believe that anything illegal or unethical (including, but not just, a breach of our policies)

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is taking place. We have a clear policy of non-retaliation against any person who raises such a concern. We investigate all concerns raised.

If we identify instances of modern slavery or human trafficking we will take suitable action to deal with the issues in question. This may include not appointing or re-appointing the supplier. It may also involve notifying relevant authorities of the issues involved.

Where a supplier does not have suitable controls in place to prevent slavery and human trafficking, we will consider whether we can work with them to implement improvements.

Our *Business Conduct Guidelines* and *Supply Chain Integrity Policy* are both available at <http://www.dcc.ie/sustainability/our-policies.aspx>. A statement of our Group policy on slavery and human trafficking is set out at the commencement of this statement.

Procedures on Slavery and Human Trafficking

As part of our compliance with the policies referred to above, we have a programme in place to ensure that companies in the Group:

- Assess potential risk areas in their supply chains, including where suppliers are located in countries where modern forms of slavery or human trafficking are prevalent;
- Mitigate the risk of slavery and human trafficking occurring in their supply chains, including by reviewing, where necessary, the controls that their suppliers have in place and carrying out other suitable checks; and
- Monitor potential risk areas in their supply chains on a periodic basis.

Businesses across the Group will be reviewing and, where necessary, improving their controls during the current financial year to ensure that they meet the requirements of the Group policies referred to above.

Training and Awareness

To ensure a suitable understanding of the risks of modern slavery and human trafficking, relevant directors and employees in our business will participate in training over the course of the current financial year.

We will also engage with suitable third parties and monitor developments in this area generally to ensure that our awareness of risks and emerging good practice in relation to the prevention of modern slavery and human trafficking is current.

Assurance Structures and Key Performance Indicators

We will develop and monitor additional key performance indicators to measure compliance with our *Supply Chain Integrity Policy* over the course of the current financial year.

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A report on the operation of the DCC *Supply Chain Integrity Policy*, including measures to identify and prevent slavery and human trafficking, will be provided to the Audit Committee and the Board of DCC plc during the current financial year.



Tommy Breen
Chief Executive