



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for the Year Ended 31 March 2018

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 a leading international sales, marketing and 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 approximately 11,000 people. More information on our 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 the following divisions:

1. DCC LPG is a global liquefied petroleum gas (LPG) sales and marketing business in Europe, Asia and the US. In the year covered by this statement, DCC LPG sold 1.9 million tonnes of product to its customer base across 10 countries in Europe, Asia and the United States. DCC LPG sources the large majority of the product it sells from oil majors such as Exxon, Shell and BP. DCC LPG purchases very little product from countries where slavery and human trafficking are a particular risk.
2. DCC Retail & Oil is a leader in the sales, marketing and retailing of transport and commercial fuels, heating oils and related products in Europe. In the year covered by this statement, DCC Retail & Oil sold 12.3 billion litres of product to its customer base across 8 countries in Europe. DCC Retail & Oil sources the large majority of the product it sells from oil majors such as Exxon, Shell and BP. DCC Retail & Oil purchases no product from countries where slavery and human trafficking are a particular risk.

3. 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 and 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 medical devices and pharmaceutical businesses such as Baxter Healthcare, BioRad, CSL Behring, Mölnycke and Smiths Medical. 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 modest amounts of products from countries or suppliers which are considered to present a particular risk of slavery or human trafficking.
4. DCC Technology is a leading route-to-market and supply chain partner for global technology brands. 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 modest amounts of products from countries or suppliers which are considered to present a particular risk of slavery or human trafficking.

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 2018 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 *Code of Conduct* sets out the Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, the Code sets out our commitment to fair employment practices (in sections 2 and 14) and the prevention of slavery and human trafficking (in section 14).

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 human rights and 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 suitable 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) is taking place. We have a clear policy of non-retaliation against any person who raises such a concern. We investigate all concerns raised. The ways in which concerns can be raised and our policies on how they are addressed are set out in our *Code of Conduct* and reiterated in other internal communications. During the year under review, we reminded employees of the importance of raising concerns and the range of ways in which they can do this as part of the relaunch of our *Code of Conduct*.

If we identify instances of 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. If suitable controls cannot be put in place, we will discontinue our relationship with the supplier in question.

Our *Code of Conduct* and *Supply Chain Integrity Policy* are both available at <http://www.dcc.ie/responsibility/our-policies>. 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 compliance with the policies referred to above, we have a programme in place to ensure that businesses in the Group:

- Assess potential risk areas in their supply chains, including where suppliers are located in countries where forms of slavery or human trafficking are a particular risk;
- 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.

Key Performance Indicators

The Group has adopted the following key performance indicators in relation to slavery and human trafficking:

1. Operations and suppliers considered to have a significant risk for incidents of forced or compulsory labour in terms of:
 - i. Type of operation (such as manufacturing plant) and supplier;
 - ii. Countries or geographic areas with operations and suppliers considered at risk.
2. Measures taken by the organisation in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labour.

Assessment Against Key Performance Indicators

None of the activities of the Group are considered to involve a significant risk of incidents of slavery and human trafficking as a result of the type of operation involved.

The large majority of the operations of the Group take place in countries where the risk of slavery and human trafficking is considered to be relatively low.

As noted above, the large majority of products sold by Group businesses are purchased from leading and reputable suppliers who maintain robust controls in relation to their own supply chains and who are, in some cases, subject to section 54 of the Modern Slavery Act 2015. The risk of incidents of slavery and human trafficking arising in relation to these suppliers is therefore considered to be low.

As also noted above, businesses in the Group purchase modest amounts of products from suppliers located in countries where slavery and human trafficking are a particular risk. We have in place or are putting in place enhanced due diligence and other suitable controls in relation to those suppliers.

During the period under review we did not identify any instances of slavery or human trafficking in our activities or our supply chains.

Training and Awareness

During the year under review, we introduced a new *Code of Conduct* for the Group. The Code is the basic policy that applies to every person who works in a DCC Group business. The revised Code contains express references to the prevention of slavery and human trafficking. The Code was communicated to the majority of Group employees during the year. This included online training on the Code for several thousand employees. Further communications will take place during the current year on the new Code.

To ensure a suitable understanding of dealing with suppliers in countries where slavery and human trafficking are a particular risk, we provide training for relevant directors and employees on doing business with parties in high-risk countries. This training was provided to some employees who deal with suppliers in those countries over the course of the year under review. Further training will be provided in this area during the present year ending 31 March 2019.

We will continue to 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 slavery and human trafficking remains current.

Steps Planned for the Year Ending 31 March 2019

The Group will take the following steps, among others, to further address the risk of modern slavery and human trafficking during the current year ending 31 March 2019:

- Continue to provide to relevant directors and employees the training referred to above on dealing with suppliers in countries where slavery and human trafficking, among other compliance problems, are a particular risk.
- Complete the launch of the new Group *Code of Conduct*, which contains, among other changes, an express reference to the prevention of slavery and human trafficking.
- Enhance our auditing of third party relationships, including the controls Group businesses have concerning slavery and human trafficking.

Assurance Structures

A report on the operation of the DCC *Supply Chain Integrity Policy*, including measures to identify and prevent slavery and human trafficking, covering the year ended 31 March 2018 was provided to the Audit Committee and the Board of DCC plc in April 2018.

A further report on the operation of the Policy covering the financial year ending 31 March 2019 will be provided to the Audit Committee and the Board of DCC plc.

Board Approval

This Statement was approved by the Board of DCC plc on 14 May 2018.



Donal Murphy
Chief Executive