



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for the Year Ended 31 March 2020

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 with a clear focus on performance and growth. Our headquarters are in Dublin, Ireland. The Group operates through four divisions: LPG, Retail & Oil, Healthcare and Technology. DCC is listed on the London Stock Exchange and is a constituent member of the FTSE 100 Index.

DCC currently has operations in 20 countries and employs over 13,200 people. More information on our divisions is set out below. Additional information on the 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 leading liquefied petroleum gas (LPG) sales and marketing business with a developing business in the retailing of natural gas and electricity. DCC LPG currently operates in ten countries in Europe, the USA and Asia. In the year covered by this statement, DCC LPG sold 2.2 million tonnes of product. DCC LPG sources the large majority of the product it sells from oil majors such as ExxonMobil, Shell and BP. DCC LPG makes about 1% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.
2. **DCC Retail & Oil** is a leader in the sales, marketing and retailing of transport and commercial fuels, heating oils and related products and services in Europe. DCC Retail & Oil operates through two distinct businesses: Oil Distribution and Retail & Fuel Cards. DCC Retail & Oil operates over 1,000 retail petrol stations and supplies a

further 1,500 dealer sites in Europe under various brand partnerships with operations in France, Sweden, Norway, Denmark, Britain, Austria and Ireland and is a leading reseller of fuel cards in Britain. In the year covered by this statement, DCC Retail & Oil sold 11.6bn litres of product. DCC Retail & Oil sources the large majority of the product it sells from oil majors such as ExxonMobil, Shell and BP. DCC Retail & Oil purchases no product from countries that scored more than 50 on the most recent Global Slavery Index.

3. **DCC Healthcare** is a leading healthcare business, providing products and services to healthcare providers and health and beauty brand owners. DCC Healthcare operates through two businesses: DCC Vital and DCC Health & Beauty Solutions. DCC Vital is involved in the sales, marketing and distribution of medical and pharmaceutical products to healthcare providers across all sectors of the healthcare market in the UK and Ireland. DCC Health & Beauty Solutions builds long term partnerships with international brand owners, providing specialist services including product development, formulation, manufacturing and packaging in Europe and the USA. Where DCC Healthcare sources materials for use in manufacturing, the suppliers are largely located in Europe or the USA. DCC Healthcare makes less than 5% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.
4. **DCC Technology** is a leading sales, marketing and value-added services partner for global technology brands. DCC Technology, which principally trades under the Exertis brand, provides a broad range of consumer and business technology products and services to customers across the consumer, B2B and enterprise markets. It operates in 19 countries with its principal operations in the UK, the USA, Canada, Ireland, France, Sweden, Germany and the United Arab Emirates. The large majority of the products sold by DCC Technology are purchased from multinational businesses such as Dell, Huawei, Lenovo, Microsoft and Samsung. DCC Technology makes less than 5% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.

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 2020 will publish separate statements under the Act. Those businesses and a link to their primary website are listed in the schedule to this statement. The statements published by qualifying Group businesses will provide additional detail on their activities, an assessment of where slavery and human trafficking risks may exist in the countries and industries in which they operate, confirmation as to whether any of their work is seasonal, and a summary of the controls they have in place to identify and prevent slavery and human trafficking.

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, section 2 of the Code sets out our commitment to fair employment practices and section 14 of the Code sets out our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

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. The Policy provides guidance to DCC Group businesses on how to conduct a risk assessment, including a sample risk assessment procedure and case studies. Our approach to due diligence is covered in more detail below.

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. 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 policies and internal communications. As well as a number of internal methods, an independent service for raising concerns is provided in all languages used within Group businesses. This service is available 24 hours a day on every day of the year. We have a clear policy of non-retaliation against any person who raises a concern; and concerns may be raised anonymously. We investigate all concerns raised. No concerns about slavery or human trafficking were raised in the period covered by this statement.

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.

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.

Risk Assessment, Due Diligence and Mitigation

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

- Assess relevant risk areas in their supply chains, including where suppliers are located in countries where slavery or human trafficking are a particular risk;
- Carry out enhanced due diligence on certain suppliers following this risk assessment;
- Mitigate the risk of slavery and human trafficking occurring in their supply chains, including by asking suppliers to confirm that they meet certain standards and undertaking audits; and
- Monitor risk areas in their supply chains on a periodic basis.

The risk assessment procedure maintained by DCC Group businesses under the *DCC Supply Chain Integrity Policy* will require enhanced due diligence to be carried out on certain suppliers, for instance because of the industry or geographies in which they operate. Geographic risk, for this purpose, is informed by relevant independent indices such as the Global Slavery Index and the Corruption Perceptions Index.

This enhanced due diligence will generally involve the supplier being asked to complete a questionnaire about its compliance controls, such as its policies and procedures, including in relation to labour standards. In addition, an independent check may be conducted on the supplier, to identify adverse media reports, litigation or regulatory enforcement activity concerning the supplier. DCC Group business work mainly with Kroll, a leading supplier of integrity due diligence services, in this area. Where red flags are identified by this due diligence, senior management are involved. If the supplier in question is appointed, suitable controls will be put in place, including confirmation that they will adhere to the Supplier Code of Practice maintained by the DCC Group business in question, which will contain a prohibition on slavery or human trafficking.

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.

Examples of slavery and human trafficking risks identified in the supply chains of DCC Group businesses and the steps taken in relation to them are set out below:

- Flogas Britain, a DCC LPG businesses, is a supplier of liquified petroleum gas (LPG) to homes and businesses. Flogas Britain has identified that engaging contractors to remove and refurbish LPG tanks located at its customers' homes and business premises could involve the exploitation of casual workers. Flogas Britain therefore has controls in place to ensure that it only appoints reputable contractors who comply with applicable employment standards.
- DCC Vital, part of the Healthcare division, purchases some medical devices from countries in Asia where slavery and human trafficking may be a problem. As part of a wider increase in the level of due diligence done on suppliers in these countries, DCC Vital has extended the scope of its factory audits to include employment and safety standards. Where areas for improvement are identified, specific corrective actions are agreed with the supplier and implemented. In the year under review, a number of suppliers put in place enhanced employment policies following audits done by DCC Vital.
- Exertis UK, a member of the Technology division, also purchases some technology products from countries in Asia where slavery and human trafficking may exist. Exertis UK has recruited additional employees to its technical regulatory function to ensure that these risks are properly assessed when suppliers are being appointed and are then managed on an ongoing basis, including through factory audits. During the period covered by this statement, Exertis UK identified in its due diligence that a potential new Asian mobile phone manufacturer had failed to meet acceptable employment standards in the past. Accordingly, the manufacturing site was audited by Exertis staff to ensure that applicable standards, notably the relevant industry code of practice, were being followed.

No businesses in DCC identified instances of slavery or human trafficking in their activities or in their supply chains during the year under review.




Key Performance Indicators

The following table sets out the key performance indicators adopted by the Group in relation to slavery and human trafficking and performance against those indicators in the period covered by this statement

Indicator	Performance
<p>1. Operations and suppliers considered to have a significant risk for incidents of forced or compulsory labour in terms of:</p> <ul style="list-style-type: none"> i. Type of operation (such as manufacturing plant) and supplier; ii. Countries or geographic areas with operations and suppliers considered at risk. 	<p>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.</p> <p>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 according to the Global Slavery Index.</p> <p>Less than 5% of products sold by Group businesses are purchased from countries that scored more than 50 on the most recent Global Slavery Index.</p> <p>DCC Group businesses deal largely with 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.</p>
<p>2. Measures taken by the organisation in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labour.</p>	<p>The continued implementation of the DCC Supply Chain Integrity Policy. Progress made in the period under review and the steps planned for the current year are described below.</p>

Review of Steps Planned for the Year Ended 31 March 2020

The following table outlines the steps we committed to take in the statement we published last year together with a summary of progress against each step.

Step	Progress	Assessment
<p>Continue to engage with relevant organisations and advisors 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.</p>	<p>DCC continued to engage with relevant organisations and advisors, including Deloitte and Kroll, on the prevention and detection of modern slavery in our supply chains.</p> <p>Guidance in this area is closely monitored and where appropriate we have communicated developments to DCC Group businesses in order to support them in their work to prevent modern slavery. An example is the industry specific guidance recently issued by the Gangmasters and Labour Abuse Authority.</p>	
<p>Continue to provide to relevant directors and employees training on dealing with suppliers in countries where slavery and human trafficking, among other compliance problems, are a particular risk.</p>	<p>In the period covered by this statement 560 employees completed training on this subject.</p>	
<p>Continue to develop our auditing of third-party relationships, including the controls Group businesses maintain to prevent slavery and human trafficking.</p>	<p>In the period covered by this statement audits done by external specialist consultants were carried out on third-party relationships in a number of Group businesses.</p> <p>These audits addressed supply chain integrity risks including the abuse of human rights and employment rights. Those audits identified a modest number of control improvements in the businesses under audit, which are being implemented.</p>	

Steps Planned for the Year Ending 31 March 2021

The Group will take the following steps, among others, to further address the risk of slavery and human trafficking during the current year ending 31 March 2021:

1. Including a module on the protection of human rights, including the prevention of modern slavery and human trafficking, in the online training on our Code of Conduct that will be provided to several thousand employees across the Group over the course of the year.
2. Carry out a review of all Group level policies and procedures that address human rights abuses including slavery and human trafficking.
3. Develop an updated Supplier Code of Practice for DCC plc, to complement those already in place in DCC Group businesses.
4. 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.
5. Continue to develop our auditing of third-party relationships, including the controls Group businesses have concerning slavery and human trafficking.
6. Continue to engage with relevant organisations and advisors 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.

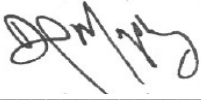
Assurance Structures

In January 2020 an update on the Group's approach and progress made in relation to the prevention of modern slavery and human trafficking was provided to the Audit Committee and the Board of DCC plc.

In the year under review, we produced reports for each division in the Group covering, among other things, progress made by businesses in that division in the implementation of the *DCC Supply Chain Integrity Policy*. We have also reviewed the statements prepared by businesses in the Group that met the turnover threshold applicable under section 54 of the Act and which are listed in the schedule.

Board Approval

This statement was approved by the Board of DCC plc on 18 May 2020.



Donal Murphy
Chief Executive
Director, DCC plc

Schedule

Group businesses that will publish a Slavery and Human Trafficking Statement under the Modern Slavery Act 2015

Group Business	Principal Website
DCC LPG	
Flogas Britain	https://www.flogas.co.uk/
Flogas Ireland	https://www.flogas.ie/
DCC Retail & Oil	
Certas Energy UK	https://www.certasenergy.co.uk/
Fuel Card Services	https://www.fuelcardservices.com/
DCC Healthcare	
DCC Vital	https://www.dccvital.com/
Laleham Health & Beauty	http://www.laleham.com/
Thompson & Capper	https://www.thompsonandcapper.com/
EuroCaps	https://www.eurocaps.co.uk/
DCC Technology	
Exertis UK	https://www.exertis.co.uk/
Exertis Ireland	https://www.exertis.ie/
Exertis Supply Chain Services	https://www.exertissupplychain.com/