



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for the Year Ended 31 March 2021

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.

Organisational Structure and Supply Chains

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 13,500 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 2.3 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 lubricants and related services in Europe supplying a growing share of bio products. DCC Retail & Oil operates through two distinct businesses: Oil Distribution and Retail & Fuel Cards. DCC Retail & Oil operates over 1,100 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 10.2bn 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 products to healthcare providers across all sectors of the healthcare market in the UK, Ireland and the DACH region. 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, the Netherlands, 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 2021 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.

Organisational Policies in Relation to Slavery and Human Trafficking

Code of Conduct

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.

Supply Chain Integrity Policy

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 appropriate 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.

Human Rights Policy

Our [Human Rights Policy](#) sets out DCC's specific commitment to observe internationally recognised standards of human rights, including in relation to forced labour, child labour and unsafe working conditions.

This Policy requires DCC Group businesses to consider human rights risks within the risk assessment procedures they maintain under the *DCC Supply Chain Integrity Policy*. It also requires businesses to take steps to identify, prevent and mitigate human rights abuses in their businesses and their supply chains.

DCC plc Supplier Code of Practice

The [DCC plc Supplier Code of Practice](#) sets out the standards suppliers to DCC plc are expected to follow, including in relation to the prevention of modern slavery and human trafficking. Following a risk assessment under our Supply Chain Integrity Policy, certain suppliers will be asked to confirm that they will adhere to these standards in their dealings with us. DCC Group businesses maintain similar codes of practice in relation to their dealings with their own suppliers.

Whistleblowing Arrangements

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.

Our *Human Rights Policy* also sets out the ways in which non-employees can raise concerns in relation to any breach of human rights that may have occurred within our operations or our supply chains.

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*, *Supply Chain Integrity Policy*, *Human Rights Policy* and the *DCC plc Supplier Code of Practice* are 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. The General Counsel and Company Secretary is the member of management with responsibility for policy development in this area. 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. Compliance with these policies and procedures is audited periodically.

Due Diligence and Assessing and Managing Risk

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 higher risk 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 at a suitable frequency.

Responsibility for complying with these policies rests with the directors of each DCC Group business.

The risk assessment procedure maintained by DCC Group businesses under the *Supply Chain Integrity Policy* requires 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.

Training

The DCC Group compliance training framework ensures that employees of the Group receive training on compliance risks that are relevant to their roles, including training on human rights risks. Both online and face-to-face training is provided depending on the subject being covered.

Risk Assessment Examples

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:

- Certas Energy UK, a DCC Retail & Oil business, identified that workers on manual car washes may be at risk of exploitation. This risk is substantially mitigated by the use of automated car washes on the majority of Certas Energy forecourts. Where the use of automated car washes is not possible, Certas Energy appoints reputable contractors that comply with applicable employment standards to provide manual car wash services. Certas Energy undertakes due diligence on the employment practices of those contractors as part of the appointment process.
- DCC Vital, part of the Healthcare division, purchases some products from suppliers based in countries in Asia where slavery and human trafficking may be a problem. In the period covered by this statement, DCC Vital decided not to appoint a number of suppliers because of red flags identified during its due diligence.
- Exertis Supply Chain Services, a member of the Technology division, also purchases some technology products from countries in Asia where slavery and human trafficking may exist. In the period covered by this statement, despite the restrictions imposed by Covid-19, it continued to conduct factory audits across the region. The scope of these audits

includes working conditions, child labour, working hours, forced labour, fair wages and gender equality.

No businesses in DCC identified instances of slavery or human trafficking in their activities or in their supply chains during the period covered by this statement.

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 adoption of a new <i>Human Rights Policy</i> in addition to continued implementation of the <i>Supply Chain Integrity Policy</i>. Progress made in the year covered by this statement and the steps planned for the current year are described below.</p> |

Review of Steps Planned for the Year Ended 31 March 2021

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.

| No. | Step | Progress | Assessment |
|-----|--|--|------------|
| 1. | Including a module on the protection of human rights, including the prevention of 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. | In the period covered by this statement over 5,000 employees completed online training on our Code of Conduct. This training included a module on the protection of human rights, including the prevention of slavery. | Complete |
| 2. | Carry out a review of all Group-level policies and procedures that address human rights abuses, including slavery and human trafficking. | A detailed review of all Group-level policies took place in the period covered by this statement. Following this review, we developed and approved a stand-alone <i>Human Rights Policy</i> , to complement our existing <i>Supply Chain Integrity Policy</i> . | Complete |
| 3. | Develop an updated Supplier Code of Practice for DCC plc, to complement those already in place in DCC Group businesses. | A <i>Supplier Code of Practice</i> was developed and approved. | Complete |
| 4. | 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. | DCC continued to engage with relevant organisations and advisors on the prevention and detection of slavery in our supply chains. 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 slavery. | Complete |
| 5. | 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. | In the period covered by this statement 375 employees completed training on this subject. | Complete |

| | | | |
|----|---|--|-----------------|
| 6. | Continue to develop our auditing of third-party relationships, including the controls Group businesses maintain to prevent slavery and human trafficking. | <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> <p>These audits were largely conducted remotely due to Covid-19 restrictions. No reduction in audit effectiveness resulted however.</p> | Complete |
|----|---|--|-----------------|

Steps Planned for the Year Ending 31 March 2022

The Group will take the following steps, among others, to further address the risk of slavery and human trafficking during the current financial year ending 31 March 2022:

1. Provide online Code of Conduct training to DCC Group businesses outside of the UK and Ireland. This training includes a module on the protection of human rights, including the prevention of slavery and human trafficking.
2. 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.
3. Include the protection of human rights as an element in our updated sustainability reporting framework. That reporting framework will be set out in the Sustainable Business Report in the 2021 DCC Annual Report.
4. Ensure the requirements of the DCC Human Rights Policy are communicated to Group businesses and integrated by them into their existing controls.
5. Continue to develop our auditing of third-party relationships, including the controls Group businesses have in place to identify and prevent 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 March 2021 an update on the Group’s approach to the protection of human rights and progress made in relation to the prevention of modern slavery and human trafficking was

provided to the Audit Committee of DCC plc.

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 17 May 2021.

A handwritten signature in black ink, appearing to read 'DM/MS', is positioned above a horizontal line.

Donal Murphy
Chief Executive and 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/ |