



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for the Year Ended 31 March 2019

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, Technology and Healthcare. DCC is listed on the London Stock Exchange and is a constituent member of the FTSE 100 Index.

DCC currently has operations in 17 countries and employs over 12,000 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 2.1 million tonnes of product. 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 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 2,000 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 12.2bn litres of product. 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 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 16 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 Acer, Dell, Lenovo, Microsoft and Samsung. DCC Technology purchases modest amounts of products from countries which are considered to present a particular risk of slavery or human trafficking.

4. **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 provides specialist services including product development, formulation, manufacturing and packaging in Europe and the USA to leading brand owners. 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 which are considered to present a particular risk of slavery or human trafficking.

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 2019 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.

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, 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.

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.

Risk Assessment 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;

- 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.

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.

Certas Energy UK is an example of where DCC Group businesses have identified risks of slavery and human trafficking in their supply chains. Certas identified that where manual car washing is provided at retail petrol forecourts there is a risk that casual workers may be exploited. Certas has controls in place to ensure that it only appoints reputable contractors who comply with applicable employment standards.

During the period covered by this statement another DCC Group business identified a supplier which may not have been compliant with employment standards in Malaysia. It is in the process of discontinuing dealings with the supplier as a result. No other possible instances of slavery or human trafficking were identified in the period.

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 according to the Global Slavery Index.

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.

Steps Planned for the Year Ended 31 March 2019

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
Continue to provide training to relevant directors and employees on doing business with parties in high risk countries.	In the period covered by this statement over 500 employees completed training on this subject.
Complete the launch of the new Group <i>Code of Conduct</i> , containing an express reference to slavery and human trafficking.	Launch of the new Code was completed.
Enhance our auditing of third party relationships, including the controls Group subsidiaries have concerning slavery and human trafficking.	In the period covered by this statement audits were carried out on third party relationships in a number of Group businesses. We will undertake further audits in the current year.

Steps Planned for the Year Ending 31 March 2020

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 2020:

- 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.

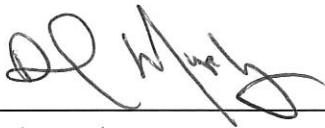
- Continue to provide to relevant directors and employees the training referred to above on dealing with suppliers in countries where slavery and human trafficking, among other compliance problems, are a particular risk.
- Continue to develop our auditing of third party relationships, including the controls Group businesses have concerning slavery and human trafficking.

Assurance Structures

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 13 May 2019.



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/