

# HUMAN RIGHTS POLICY



**DO THE  
RIGHT  
THING**

**DCC**





# CHIEF EXECUTIVE'S INTRODUCTION



DCC is committed to ensuring that human rights are respected in our activities and our supply chains. This is consistent with our purpose as a company – to enable people and businesses to grow and progress. It is also in keeping with our core values of Safety, Integrity, Partnership and Excellence.

This Policy sets out our commitment to respect and protect human rights. It should be read with our Supply Chain Integrity Policy, which sets out our overall approach to ensuring that the products we sell and the suppliers we deal with comply with relevant standards, including, but not just, human rights. Our Supply Chain Integrity Policy requires an integrated approach to assessing risk and undertaking due diligence in a number of areas; this Human Rights Policy provides more detail on our position on human rights in particular.

The directors of each DCC Group business are responsible for ensuring that this Policy and our Supply Chain Integrity Policy are integrated into their business processes. Doing this will ensure that our core purpose is met, our core values applied and the lives of the people we affect improved.

Always remember, if you think that something wrong is taking place, you must raise a concern. If you are in doubt about the right course of action, always ask. You will always be supported for doing the right thing.

**Donal Murphy**  
Chief Executive



## WHAT IS COVERED BY THIS POLICY?

This Policy sets out the position of DCC plc in relation to the protection of human rights in the following areas:

1. Commitment to Human Rights
2. Due Diligence
3. Access to Remedies
4. Raising Concerns



## WHEN DOES THIS POLICY APPLY?

This Policy applies to every business in which DCC plc has a controlling interest (a "DCC Group business"). The directors of each DCC Group business must ensure that this Policy is followed by that business in every area of its activities. In this Policy the term "director" refers to any company director or any person who sits on the leadership team or management board of the DCC Group business in question.

Businesses in which DCC plc does not have a controlling interest should be requested to comply with this Policy.

# HOW DOES THIS POLICY RELATE TO OTHER DCC POLICIES?

This Policy sits alongside and is complementary to other Group policies, in particular the Code of Conduct and Supply Chain Integrity Policy. As noted in the Introduction, the Supply Chain Integrity Policy requires DCC Group businesses to carry out suitable risk-based due diligence on their suppliers.

# WHAT HAPPENS IF THIS POLICY IS NOT FOLLOWED?

A deliberate or negligent failure by a director of any DCC Group business to comply with this Policy may result in disciplinary action, up to and including dismissal.

# REPORTING AND GOVERNANCE

The Group Management Team of DCC plc has overall responsibility for the application of this Policy. As noted, above, the directors of each DCC Group business must ensure that this Policy is followed within that business.

The compliance questionnaire that issues periodically to all DCC Group businesses will include a number of questions on compliance with this Policy. The Legal & Compliance team in DCC will also undertake periodic audits in DCC Group businesses to ensure that this Policy is being followed.

Compliance with this Policy will be reported to the Executive Risk Committee, Audit Committee and Board of DCC plc.

We will report to our shareholders and other stakeholders on compliance with human rights standards principally through our Annual Report. Group businesses that are subject to the UK Modern Slavery Act 2015 will also report in accordance with that Act's requirements.



# 1. COMMITMENT TO HUMAN RIGHTS

DCC is committed to respecting internationally recognised human rights standards. We will take appropriate steps to identify, prevent and mitigate human rights risks, and will take steps to remedy any adverse impact we identify. We will report on our human rights impacts as part of our Annual Report.

DCC Group businesses must ensure that the following human rights standards are observed within their own activities and, as far as reasonably practicable, in their supply chains:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organisations Declaration on Fundamental Principles and Rights at Work

Specifically, DCC Group businesses should aim to ensure that within their own activities and, as far as reasonably practicable, in their supply chains employees and other workers are:

- Provided with a safe working environment;
- Paid fairly and on time for the work they do;
- Not subject to any form of duress, such as having to repay large loans or having their passport retained;
- Not discriminated against because of their gender, disability, religion, age, ethnicity, marital status, sexual orientation or any other status protected by applicable law;
- Not subjected to any form of slavery;
- Not under the legal minimum age of employment.

In many countries, national laws set standards that are at least as high as those set out in these international human rights standards. Where that is the case, national laws should be followed. However, where national laws do not provide a suitable level of protection, international human rights standards should be observed. If a conflict between national law and international human rights standards occurs, DCC Group businesses should respect national law while endeavouring to protect human rights.

## 2. HUMAN RIGHTS DUE DILIGENCE

Every DCC Group business should expressly consider human rights risks within the risk assessment procedures it maintains under the DCC Supply Chain Integrity Policy.

Every DCC Group business should then use that risk assessment to determine the controls it puts in place to detect and mitigate human rights failures.

This should include suitable ongoing monitoring of medium and high risk relationships.

Suitable employee training should be provided to maintain awareness of human rights risks in DCC Group businesses and in their supply chains.

## 3. ACCESS TO REMEDY

DCC Group businesses must take appropriate steps to identify, prevent and mitigate human rights failures, both in their own activities and in their supply chains, and should act to remedy any adverse impact they identify.

Allegations that human rights are not being respected in any DCC Group business or in its supply chain will be taken seriously and will be investigated. If DCC Group businesses identify evidence that human rights are not being respected, they must take suitable action in response. This may include, for instance, working with an existing or potential supplier to improve its standards and not buying products from the supplier in question until those improvements have been made.



# 4. HOW TO RAISE A CONCERN



## RAISE A CONCERN

### For Employees

Employees of DCC Group businesses are required to report any breach of our policies, including any suspected breach of human rights. Every DCC Group business is required to communicate the ways in which their employees can raise concerns. These are:

**Employees can contact the Group General Counsel of DCC plc on:**

- +353 1 2799 497
- [doing-the-right-thing@dcc.ie](mailto:doing-the-right-thing@dcc.ie)

**Or they can contact Safecall, an independent service for raising concerns on:**

- [www.safecall.co.uk/report](http://www.safecall.co.uk/report)
- [dccgroup@safecall.co.uk](mailto:dccgroup@safecall.co.uk)

This service is available 24 hours a day, every day of the year.

Reports may be made anonymously.

More details on how we deal with concerns are set out in our Code of Conduct.

### For Non-Employees

Any other person who believes a breach of human rights may have occurred or be occurring within our operations or our supply chains can contact the Group General Counsel of DCC plc on:

- +353 1 2799 497
- [doing-the-right-thing@dcc.ie](mailto:doing-the-right-thing@dcc.ie)

### Non-Retaliation

Retaliation against any person who raises a concern about a possible breach of this Policy is strictly prohibited.



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