



DCC plc

Modern Slavery Act 2015

Slavery and Human Trafficking Statement for the Year Ended 31 March 2022

1. Background

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. In the year under review, the Group operated 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 21 countries and employs over 15,000 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.

This is the seventh Modern Slavery and Human Trafficking Statement issued by DCC plc under the UK Modern Slavery Act 2015.

2. 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.

3. Our Divisions and Supply Chains

During the year under review, DCC was organised in the following divisions:

1. **DCC LPG**, a leading liquefied petroleum gas (LPG) sales and marketing business with a developing business in the retailing of natural gas and electricity. DCC LPG operated during the year in ten countries in Europe, the USA and Asia. In the same year, DCC LPG sold 2.3 million tonnes of product. DCC LPG sourced the large majority of this product from oil majors such as ExxonMobil, Shell and Phillips66. DCC LPG sourced less than 1% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.
2. **DCC Retail & Oil**, 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 operated over 1,150 retail petrol stations and supplied a further 1,450 dealer sites in Europe during the year under

various brand partnerships with operations in France, Sweden, Norway, Denmark, Britain, Austria, Luxembourg and Ireland as well as operating a leading fuel cards business in Britain. In the same year, DCC Retail & Oil sold 11.6bn litres of product. DCC Retail & Oil sourced the majority of this product from oil majors such as ExxonMobil, Shell, Phillips66 and Valero. DCC Retail & Oil purchased no product from countries that scored more than 50 on the most recent Global Slavery Index.

3. **DCC Technology** is a leading sales, marketing and value-added services partner for global technology, appliance and lifestyle brands. DCC Technology, which principally trades under the Exertis and Almo brands operates across seven specialisms where product range, expert knowledge and geographic reach support the provision of enhanced value-added services to customers in the consumer, retail, B2B and enterprise markets. It operates in 19 countries with its principal operations in the USA, Canada, UK, Ireland, France, Sweden, Germany, the Netherlands, and the United Arab Emirates. The majority of the products sold by DCC Technology are purchased from multinational businesses such as Samsung, Lenovo, Dell, LG, Asus and Apple. DCC Technology makes less than 5% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.
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 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.

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.

4. Organisational Policies in Relation to Slavery and Human Trafficking

4.1. 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.

4.2. 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.

Group businesses do this in the first place by considering the location of the supplier and the products or services they provide. Where this assessment indicates that there is a risk of slavery or human trafficking, further due diligence is undertaken, including further research into the supplier's practices and controls.

Having conducted this risk assessment, Group businesses put in place suitable controls that seek to prevent slavery and human trafficking.

Our Policy provides guidance to Group businesses on how to conduct a risk assessment, including a sample risk assessment procedure and case studies, and on putting controls in place if the supplier is appointed.

4.3. 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.

4.4. 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.

5. 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.

6. 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 businesses work mainly with Kroll, a leading supplier of integrity due diligence services, in this area. Where red flags are identified by this due diligence (for example adverse media reports or relationships with parties that have been the subject of regulatory enforcement action or criticism) 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 and 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.

7. 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:

- The invasion of Ukraine by Russia in February 2022 has resulted in a significant displacement of Ukrainian citizens, including to other countries in Europe where the Group has operations. This displacement may increase the risk of slavery and human trafficking in those countries. Group businesses in those locations are monitoring this risk and will, with their suppliers, continue to do so until the situation has resolved.
- An emerging risk area for some businesses in the Group relates to the possible use of forced labour in the production of products originating in the Xinjiang region of China, including the components of solar photovoltaic panels. This situation is being monitored and additional due diligence is undertaken as appropriate.

- Certas Energy UK, a DCC Retail & Oil business, identified a number of years ago 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 continued to undertake enhanced due diligence on its new and existing suppliers that seeks to identify modern slavery and human trafficking, among other risks.

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.

8. 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. In the year under review, almost 4,000 employees across the Group completed training on the DCC Code of Conduct, including a module on human rights.

9. 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
1. Operations and suppliers considered to have a significant risk for incidents of forced or compulsory labour in terms of: <ol style="list-style-type: none"> i. Type of operation (such as manufacturing plant) and supplier; and 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</p>

	<p>scored more than 50 on the most recent Global Slavery Index, namely China, India, Thailand Mexico and Ukraine.</p> <p>DCC Group businesses deal largely with leading and reputable suppliers who state that they 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>
2. Measures taken by the organisation in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labour.	Continued implementation and adherence to our <i>Human Rights Policy</i> and <i>Supply Chain Integrity Policy</i> . Continued provision of training covering human rights, including the prevention of slavery and human trafficking. Progress made in the year covered by this statement and the steps planned for the current year are described below.

10. Review of Steps Planned for the Year Ended 31 March 2022

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.	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.	In the period covered by this statement, over 3,700 employees outside the UK and Ireland 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.	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, 604 employees completed training on this subject.	Complete
3.	Include the protection of human rights as an element in our updated	The Group's updated sustainability reporting framework was set out	

	sustainability reporting framework. This reporting framework will be set out in the Sustainable Business Report in the 2021 DCC Annual Report.	the 2021 Annual Report and included human rights.	Complete
4.	Ensure the requirements of the DCC Human Rights Policy are communicated to Group businesses and integrated by them into their existing controls.	Human rights due diligence is incorporated into due diligence undertaken by Group businesses in accordance with our <i>Supply Chain Integrity Policy</i> .	Complete
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.	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. 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. These audits were largely conducted remotely due to Covid-19 restrictions. No reduction in audit effectiveness resulted however.	Complete
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.	DCC continued to engage mainly with Kroll, a leading supplier of integrity due diligence services, and 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

11. Steps Planned for the Year Ending 31 March 2023

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 2023:

1. Provide online Code of Conduct training to employees in DCC Group businesses, in particular new employees and employees in recently-acquired businesses. 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. Report on human rights in accordance with our Sustainability Reporting Framework, set out in the Sustainable Business Report in the 2021 DCC Annual Report.
4. Ensure the requirements of the DCC *Human Rights Policy* and *Supply Chain Integrity Policy* are followed by Group businesses.
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.

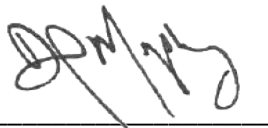
12. Assurance Structures

In April 2022 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 these are listed in the schedule.

13. Board Approval

This statement was approved by the Board of DCC plc on 16 May 2022.



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/