



DCC plc

## Modern Slavery Act 2015

### Slavery and Human Trafficking Statement for the Year Ended 31 March 2023

#### 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. The Group operates through three divisions: Energy, 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 22 countries and employs over 16,000 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](http://www.dcc.ie).

This is the eighth Modern Slavery and Human Trafficking Statement issued by DCC plc under the UK Modern Slavery Act 2015. Our previous Statements are also available on [www.dcc.ie](http://www.dcc.ie). This statement sets out the steps we have taken, and continue to take, to prevent slavery and human trafficking in our operations and supply chains.

#### 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. This is consistent with our core values of Safety, Partnership, Excellence, and Integrity.

#### 3. Our Divisions and Supply Chains

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

1. **DCC Energy** is a business focused on accelerating its customers' net zero journey by leading the sales, marketing and distribution of low-carbon energy solutions. It does this in two main areas: Energy Solutions and Mobility. DCC Energy Solutions business works with commercial and domestic customers to provide effective energy solutions across 13 countries in Europe, North America and Asia. DCC Energy Mobility operates leading energy networks for road users across six countries in Europe. DCC Energy had revenues of £17.4

billion in the year ended 31 March 2023 derived from oil, LPG, natural gas, electricity, solar panels, heat pumps and associated products. DCC Energy sourced the large majority of its products from oil majors such as ExxonMobil, Shell, Phillips66 and Valero. DCC Energy made less than 1% of its purchases from countries whose vulnerability rating score was more than 50 on the most recent Global Slavery Index.

2. **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 Microsoft, Samsung, Lenovo, Dell, LG, Asus and Apple. DCC Technology makes less than 5% of its purchases from countries whose vulnerability rating score was 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 diagnostic products to healthcare providers across all sectors in the British, Irish DACH and selected international healthcare markets. 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 whose vulnerability rating score was 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 2023 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.

#### **4.5. Policy management**

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 in section 2 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.

## **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. All concerns, in whichever manner raised, are investigated and appropriate action is taken. No concerns about slavery or human trafficking were raised in the period covered by this statement.

## **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 depending on the risk assessment.

Responsibility for ensuring that these processes are in place within Group businesses 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. In the period under review, we have taken decisions not to deal with certain suppliers as they have not met the standards set by DCC.

## **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:

- A key risk being monitored in Group businesses that operate in the solar energy sector (for instance, PVO in the Netherlands and Solewa and Soltea in France) relates to solar energy products and related materials that originate from the Xinjiang region of China because of alleged state-sponsored oppression of the Uyghur minority and their use as forced labour there. The solar sector has heightened exposure to human rights risks since much of the global supply of quartz, an important raw material for solar panels, originates in Xinjiang. Its processing into polysilicon and manufacture of photovoltaic panels is undertaken by many Chinese manufacturers at all levels of the supply chain. Many of those suppliers are alleged to have significant interests in Xinjiang. Through membership of solar industry technical and trade associations in Europe, DCC businesses are working with other purchasers of solar products to seek greater transparency through traceability mapping and auditing of facilities aimed at eradicating forced labour in solar supply chains.

- The invasion of Ukraine by Russia in February 2022 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 continue to monitor this risk.
- Businesses in DCC Technology have controls in place to prevent the supply of sensitive technologies to a number of Chinese manufacturers of surveillance and monitoring products whose products are alleged to be used in furtherance of human rights violations in the Xinjiang region of China. A small number of these manufacturers have been designated by the US government under the US Entity List for their role in the alleged supply of video surveillance cameras used in the mass detention and abuse of the Uyghur minority in Xinjiang.
- Certas Energy UK, a DCC Energy 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 Certas Energy works with third parties, it takes steps to ensure it only uses reputable contractors who comply with applicable employment standards. To further its management of this risk, Certas Energy has recently established an ESG Committee comprised of members of senior management together with subject matter experts, with specific reference to prevention of modern slavery.
- Flogas Britain, another DCC Energy business, buys valves and cylinders for distribution of LPG from Thailand and portable heaters that operate on LPG from Mexico. As part of Flogas Britain's supply chain integrity risk assessment, Flogas Britain identified a risk of modern slavery as part of the manufacturing process for these products. Accordingly, Flogas Britain has retained the services of a third-party industry leading supply chain risk management company to conduct audits to provide transparency around standards of labour, health and safety, environmental performance, and ethics at each factory.
- DCC Vital, part of the Healthcare division, purchases some products from suppliers based in countries 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.

## **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, for example those involved in dealing with suppliers or procuring products from high-risk jurisdictions, 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, over 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
<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"> <li>i. Type of operation (such as manufacturing plant) and supplier; and</li> <li>ii. Countries or geographic areas with operations and suppliers considered at risk.</li> </ul>	<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. The principal sources of supply for products that score more than 50 are 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>
<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>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.</p>

## 10. Review of Steps Planned for the Year Ended 31 March 2023

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 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.	In the period covered by this statement, 4,283 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. The training is still being rolled out to some newer acquisitions.	In progress
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.	In the period covered by this statement 441 employees completed training on this subject.	Complete
3.	Report on human rights in accordance with our Sustainability Framework, set out in the Sustainable Business Report in the 2023 DCC Annual Report.	Human rights are reported on as part of the Sustainable Business Report in the 2023 Annual Report, in line with the Group's Sustainability Framework.	Complete
4.	Ensure the requirements of the DCC <i>Human Rights Policy</i> and <i>Supply Chain Integrity Policy</i> are followed by Group businesses.	All Group businesses are bound by the requirements of the <i>Human Rights Policy</i> and <i>Supply Chain Integrity Policy</i> . Training is provided to employees as described above, and a regular audit programme in place of Group businesses to ensure controls appropriately implemented.	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	Complete



		<p>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. A focus of work this year has been on the protocol for auditing suppliers in the solar sector.</p>	
6.	<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 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. During the year we have engaged with Verisk Maplecroft and Senegy Technical Services (STS) in relation to the solar industry.</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 slavery.</p>	Complete

## 11. Steps Planned for the Year Ending 31 March 2024

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 2024:

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 Framework.
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. And specifically, continue to work with industry organisations to address the risk of slavery and human trafficking in the solar energy supply chain.

## 12. Assurance Structures

In April 2023 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 15 May 2023.



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
<b>DCC Energy</b>	
<a href="https://www.flogas.co.uk/">Flogas Britain</a>	<a href="https://www.flogas.co.uk/">https://www.flogas.co.uk/</a>
<a href="https://www.flogas.ie/">Flogas Ireland</a>	<a href="https://www.flogas.ie/">https://www.flogas.ie/</a>
<a href="https://www.certasenergy.co.uk/">Certas Energy UK</a>	<a href="https://www.certasenergy.co.uk/">https://www.certasenergy.co.uk/</a>
<a href="https://www.fuelcardservices.com/">Fuel Card Services</a>	<a href="https://www.fuelcardservices.com/">https://www.fuelcardservices.com/</a>
<b>DCC Healthcare</b>	
<a href="https://www.dccvital.com/">DCC Vital</a>	<a href="https://www.dccvital.com/">https://www.dccvital.com/</a>
<a href="http://www.laleham.com/">Laleham Health &amp; Beauty</a>	<a href="http://www.laleham.com/">http://www.laleham.com/</a>
<a href="https://www.thompsonandcapper.com/">Thompson &amp; Capper</a>	<a href="https://www.thompsonandcapper.com/">https://www.thompsonandcapper.com/</a>
<a href="https://www.eurocaps.co.uk/">EuroCaps</a>	<a href="https://www.eurocaps.co.uk/">https://www.eurocaps.co.uk/</a>
<b>DCC Technology</b>	
<a href="https://www.exertis.co.uk/">Exertis UK</a>	<a href="https://www.exertis.co.uk/">https://www.exertis.co.uk/</a>
<a href="https://www.exertis.ie/">Exertis Ireland</a>	<a href="https://www.exertis.ie/">https://www.exertis.ie/</a>