

## Modern Slavery Act 2015

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

### 1. Our Policy

Certas Energy UK Ltd (“Certas Energy”) is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

### 2. Our Business

We are a distributor of fuels and lubricants in the energy sector. Seasonal work is a feature of the industry in which we operate. More information on our business is available at [www.certasenergy.co.uk](http://www.certasenergy.co.uk)

Certas Energy is part of the DCC Group. DCC is a leading international sales, marketing and support services group with a clear focus on performance and growth. Its headquarters are in Dublin, Ireland. It is listed on the London Stock Exchange and is a constituent of the FTSE 100 Index.

DCC currently has operations in 20 countries and employs over 13,500 people. Additional information on the Group is available at [www.dcc.ie](http://www.dcc.ie).

### 3. Organisational Structure and Supply Chains

Our business is organised into the following business units and supplies the products and services outlined below:

#### Bulk Fuels

We provide a diverse range of bulk fuels for on and off-road vehicles and machinery. We also supply heating oils for commercial applications.

#### Lubricants

Certas Energy supplies lubricants from Shell, Castrol, Gulf and Valvoline. We are Shell’s largest and Gulf’s only distributor in Great Britain. Our range of products meets all lubricant requirements.

#### Roadside Services

We supply fuel to over 1,200 service stations for Gulf, Pace and independent roadside service operators across Great Britain, including Bunkers designed to allow large vehicles safe, easy access to high-speed pumps delivering diesel, gas oil and other fuels and operated on behalf of our clients. We also have a growing network of self-owned sites.

We only source products from reputable suppliers, the majority of whom are based the European Union. We have one supplier based outside the European Union in the USA.

The following table contains a summary of the activities that we consider present the highest risk of slavery and human trafficking in the industries in which we operate, with, in each case, a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

Industry Risk	Steps Taken
Our business identified that workers on manual car washes may be at risk of exploitation. This	Where the use of automated car washes is not possible, Certas Energy appoints reputable

risk is substantially mitigated by the use of automated car washes on Certas Energy forecourts.	contractors that comply with applicable employment standards to provide manual car wash services. Certas Energy also carry out due diligence on their employment practices.
Our business identified that workers providing cleaning services at our offices, depots and petrol stations may be at risk of exploitation.	Certas Energy appoints reputable contractors that comply with applicable employment standards to provide cleaning services. Certas Energy also carry out due diligence on their employment practices.
Our business provides product and brand to many retail forecourts, where we identified that workers may be at risk.	We agree formally with all our retail customers that they will operate in accordance with good trading practices, standards and procedures which reflect a commitment to safety and human rights in the workplace, anti-bribery and anti-corruption.
Our business engages some agents and contractors to provide some services including oil tank installation and removal and maintenance services.	We only use approved contractors who have successfully completed our supplier onboarding process. The Know Your Supplier process includes a risk assessment based upon publicly available information and responses to due diligence questions which relate to areas including commitments to safety and human rights in the workplace, anti-bribery and anti-corruption policies and practices.

#### 4. Policies in relation to Slavery and Human Trafficking

The DCC Code of Conduct sets out our 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.

The DCC Group Supply Chain Integrity Policy sets out the approach taken by every business in the DCC Group to ensuring that all the products we sell meet applicable legal and ethical standards.

In addition, the DCC Human Rights Policy sets out DCC's specific commitment to operate to internationally recognised standards of human rights, including in relation to forced labour, child labour and unsafe working conditions.

These documents are available at <http://www.dcc.ie/responsibility/our-policies>.

Our policy on slavery and human trafficking is set out in section 1 of this statement.

The requirements of our Code of Conduct, Group Supply Chain Integrity Policy, Human Rights Policy and our own policy are reflected in the more detailed policies and procedures that we have in place in Certas Energy. These are addressed in more detail in section 6 of this statement.

#### 5. Due Diligence and Assessing and Managing Risk

As part of our compliance with the policies referred to above, we take the following steps:

- Assess potential risk areas in our supply chains;

- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

## **6. Assurance and Key Performance Indicators**

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of Certas Energy.

We report on compliance with the DCC Group Code of Conduct and Supply Chain Integrity Policy every six months.

## **7. Training and Awareness**

In the period covered by this statement 95% of employees in our business completed either online or face-to-face training on our Code of Conduct which covered the protection of human rights, including the prevention of slavery.

We provide training to relevant employees on supply chain risks, including the risk of slavery and human trafficking at suitable intervals. Our participation in industry associations and our dealings with suppliers also provide information on where slavery and human trafficking risks may arise in the industries where we are active and best practice in avoiding them.

## **8. Nature of this Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 March 2021.

This statement has been approved by the board of directors of Certas Energy UK Ltd.



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Steve Taylor  
Managing Director  
Certas Energy UK Ltd  
21st June 2021