### Certas Energy UK Ltd

### Modern Slavery Act 2015

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

### 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

Certas Energy's aim is to provide world class energy solutions to our wide range of commercial and domestic customers. As the UK's largest independent supplier of liquid fuels into the residential, commercial and agriculture markets, we operate 100 depots and 900 trucks in this sector. Certas Energy Lubricants supplies premium branded lubricants for businesses throughout the UK and France. Roadside Services brings together Retail, Fuel Cards, Bunker sites and SNAP Account. We are leading all our customers in their energy transition. Whether this means delivering lower carbon liquid fuels or moving to EV, Air Source Heat Pumps and solar, we will provide expert advice and solutions to ensure the right energy fit to our customer's needs.

More information on our business in available at <u>www.certasenergy.co.uk</u>

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 21 countries and employs over 15,000 people. Additional information on the Group is available at <u>www.dcc.ie</u>.

# 3. Organisational Structure and Supply Chains

Certas Energy is organised into three business units as outlined below:

#### Bulk Fuels

We are the UK's largest fuel distributor, supplying residential, agricultural, industrial, commercial and the public sector nationwide. Delivering billions of litres of high-quality fuel all over the UK each year, we are committed to supporting our communities and the environment with alternative, cleaner fuel options. Providing total fuel management solutions and carbon consulting expertise, backed by an extensive supply network and dedicated commitment to safety and sustainability, our customers partner with us for fuel reliability, improved efficiency, convenience and compliance as we transition to a new energy mix together.

#### Lubricants

We are trusted by the world's leading brands to deliver market leading lubricants across the UK and France. Our customers rely on us for lubricants to maximise efficiency, boost performance and reduce downtime. Our extensive portfolio covers a wide range of lubricants from industry leading manufacturers like Shell, Castrol, Q80ils and Valvoline.

#### **Roadside Services**

We deliver to over 750 retail forecourts across the UK and own and operate a further 100 sites (including in the Isle of Man and the Channel Islands). As well as providing a national network of bunker sites for HGV customers, Fuel Cards and SNAP account for cashless payments for roadside services in the commercial sector. We aim to make every road journey for every customer, safer, easier and more sustainable across the UK and Europe through World Class

We only source products from reputable suppliers, the majority of whom are based the EEA. 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 risk is substantially mitigated by the use of automated car washes on 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 also carry out due diligence on their employment practices. Certas Energy is also a member of the Car Wash Association (CWA) which works closely with the government on modern slavery and human trafficking issues in this sector.
Our business identified that workers providing cleaning services at our offices, depots and petrol stations may be at risk of exploitation. Our business provides product and	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. We agree formally with all our retail
brand to many retail forecourts, where we identified that workers may be at risk.	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 offers a carbon offsetting proposition and it is recognised that the offset projects may be undertaken in jurisdictions which are likely to be at higher risk of modern slavery issues	We undertook due diligence on our carbon offsetting provider in accordance with our Supplier Integrity Due Diligence process to ensure that they have appropriate policies and procedures in place to comply with applicable laws and carry out their own necessary due diligence.

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.
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## 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 <u>http://www.dcc.ie/responsibility/our-policies</u>.

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

Page 4 of 5

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 1,018 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. Across the business, 96% of employees have completed the most recent training as part of our new starter and refresher training program.

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. We are also gold level partners of the Supply Chain Sustainability School and make use of the various training and networking events available to enhance awareness generally across sustainability topics, including modern slavery.

# 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 2022.

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

Steve Taylor Managing Director

Certas Energy UK Ltd 15<sup>th</sup> June 2022