

## Modern Slavery Act 2015

### Slavery and Human Trafficking Statement for the Year Ended 31 March 2024

#### 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. This is the ninth Modern Slavery and Human Trafficking Statement issued by Certas Energy under the UK Modern Slavery Act 2015.

#### 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 across 86 sites with 724 trucks in this sector. Certas Lubricant Solutions supplies premium branded lubricants for businesses throughout the UK and France. Roadside Services brings together Retail, Fuel Cards, Bunker sites and SNAP Account. We also recognise the importance of energy transition and to accelerate our customers’ net zero journey through the provision of low-carbon energy solutions, we have recently invested in several key acquisitions. Across these renewable energy businesses, we are able to offer lower carbon liquid fuels (HVO), electric vehicle charging solutions, air and ground source heat pumps and solar PV, for homes and businesses, providing expert advice and solutions to ensure the right energy fit to our customer’s needs now and in the future.

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 and sits within its Energy division. 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 member of the FTSE 100 Index.

DCC currently has operations in 22 countries and employs over 16,000 people. Additional information on the Group is available at [www.dcc.ie](http://www.dcc.ie).

#### 3. Organisational Structure and Supply Chains

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

## Energy

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 also driving energy transition across all our business sectors and partnering with customers, as they look to transition to cleaner alternatives such as replacement liquid fuel Hydrotreated Vegetable Oil (HVO).

## Solutions

## Lubricant

We are trusted by the world's leading brands to deliver market leading lubricants and services across the UK and France. Our customers rely on us for lubricants to maximise efficiency, boost performance and reduce downtime. Our extensive portfolio of products from Shell, Castrol, Q8, Valvoline, Hyperdrive and Vickers Oils covers a wide range of lubricant applications.

## Solutions

## Roadside

We deliver to over 800 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 products, facilities and customer service.

## Services

## Renewable Energy

We are committed to supporting customers to decarbonise their homes and businesses. In the period covered by this statement we introduced a Renewable Energy division focused on delivering design, specification and installation services of renewable technologies which include solar PV and battery storage, air and ground source heat pumps and EV charging. The division comprises four renewable energy businesses who are each market leaders in terms of scale, compliance and renewable energy installation expertise. We have welcomed over 200 new colleagues to Certas Energy through these acquisitions.

We only source products from reputable suppliers, the majority of whom are based in 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
<p>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.</p>	<p>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.</p>
<p>Our business identified that workers providing cleaning services at our offices, depots and petrol stations may be at risk of exploitation.</p>	<p>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. All employees in our retail stores have been given training in the last year on spotting signs of modern slavery as part of their Code of Conduct training.</p>
<p>Our business provides product and brands to many retail forecourts, where we identified that workers may be at risk.</p>	<p>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.</p>
<p>Our business engages some agents and contractors to provide some services including oil tank installation and removal and maintenance services and the installation of renewable technologies such as air source heat pumps and solar panels.</p>	<p>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. In the case of installers used for the installation of heat pumps and solar panels, we</p>

Industry Risk	Steps Taken
	ensure that they are accredited and comply with recognised industry certifications and Code of Practice such as MCS.
Our business has identified an emerging risk area relating to the sourcing of some products relating to its energy transition products and service offerings such as solar photovoltaic panels.	This situation is being monitored and additional due diligence is undertaken as appropriate. Specialist due diligence questions have been created for inclusion in any future acquisition projects.

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

The DCC Code of Conduct (“the Code”) sets out our Group’s commitment to acting ethically and with integrity towards our employees and in all our business relationships. The Code underpins most of the compliance policies and processes that are in place at Certas Energy.

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, in 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 the Code, 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 5 of this statement. The Code of Conduct is made available to all new joiners and training materials and webinars are available to all colleagues, providing bespoke training given

on key areas which are most applicable to them, including the protection of human rights and the identification of and prevention of modern slavery.

## **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 business and our supply chains evaluating source location, materiality, product type and manufacturer and carrying out integrity actions based on overall risk assessment.
- Provide guidance to our suppliers on our principles via the Supplier Code of Practice (which will be reviewed and updated during the course of financial year 2025).
- 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.
- Certas Energy sources the majority of its products from oil majors such as Shell, Essar, Phillips 66 and Valero.
- Certas Energy purchased less than 1% of its purchases from countries that scored more than 50 on the most recent Global Slavery Index.

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

Accountability for ensuring that our procedures are adequate and are adhered to in all areas of our activity rests with the directors of Certas Energy. Responsibility for defining and implementing relevant policies and procedures sits with the Legal and Compliance and HR team teams.

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

## **7. Training and Awareness**

All employees have access to a copy of the Code of Conduct and it is provided to new starters and newly acquired businesses as part of the onboarding process. All colleagues complete refresher training of the entire Code as part of a review cycle every 2 years, with updates on individual topics covered by the Code periodically.

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.

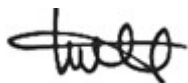
Certas Energy has an Environmental Sustainability Committee with delegated authority from the Board. This committee is made up of a number of representatives across all divisions of Certas Energy, who represent each of the four sustainability pillars – 1) Climate Change and Energy Transition 2) Environmental and Safety Protection 3) People and Social 4) Governance and Compliance. The ESG Committee oversees the creation of the Modern Slavery statement and all members receive specific and targeted training on Modern Slavery during the period.

Certas Energy encourages all employees to “Do the Right Thing” and “Raise a Concern” if they believe that there is something wrong. The Whistleblowing policy and procedure is well documented and publicised, and Certas Energy encourages reports to be made internally, to DCC Group or via an independent whistleblowing service which is available 24 hours a day, every day of the year. Certas Energy has a clear policy of non-retaliation against any person who raises a concern and commits to ensuring that any person is fully supported, that concerns are taken seriously and carefully investigated, anonymity will be respected where requested, and appropriate action will taken. No concerns about slavery or human trafficking were raised in the period covered by this statement.

#### **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 2024.

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

A handwritten signature in black ink, appearing to read 'Steve Little', is positioned above the name of the Managing Director.

Steve Little Managing Director