

# Supplier code of practice



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# Introduction

At Certas Energy UK Limited, part of DCC's Retail & Oil Division, we see our suppliers as long-term strategic business partners with whom we develop mutually beneficial relationships.

We are committed to working with you to provide products and services to the highest standards of quality and integrity that we and our customers expect.

## Forward from Steve Little, Managing Director

To maintain a sustainable relationship, it is important that everything we do together is underpinned by a strong ethical and legal culture, while remaining commercially focused. Having in place a team that understands how to operate ethically, in compliance with relevant laws, protects your business and reputation as much as our own. We embrace this approach in every area of our activities, which includes requiring stakeholders at all levels in our supply chain to achieve similarly high standards.

A key part of our partnering with suppliers is this Code of Practice which sets out the most important ethical and legal standards that apply to the business we do together. As part of working together, we expect you to take suitable steps to meet the standards set out in this Code, including by bringing it to the attention of the members of your team who are involved, directly or indirectly, in supplying any products or services to us. Following the standards in this Code of Practice will help to create a bond of trust to support a sustainable long-term business relationship.

Excellent communication is essential in all our supplier relationships; this requires honesty and transparency from both of us, as well as the ability to listen and share views. If you have any concerns, you should feel free to raise them. I can be contacted directly or concerns can be raised with your normal contact in our business.

We will treat all notifications confidentially to the maximum extent we can. We will also ensure that no person who raises a concern will lose out as a result. If you have concerns, we want to know about them.

We look forward to doing business with you.



**Steve Little**  
**Managing Director, Certas Energy UK Limited**

# Health and safety

## Principle

Health and safety is fundamental to good business performance and long term business success.

## What this means

We will always support you when you choose to work safely. No task is so important that we cannot choose to do it safely. We must always follow a plan to manage change in our respective businesses. If anyone in our businesses believes safety is at risk of being compromised, they must feel able to intervene and stop the work.

# Employment and human rights

## Principle

We employ our people on fair terms and in accordance with relevant human rights protection.

## What this means

We will both ensure that our respective employees are treated fairly, in compliance with all applicable laws and regulations, including in relation to non-discrimination, fair wages, working time, child labour, and freedom of association. All work must be undertaken voluntarily with workers not required to surrender their passport and similar document as a condition of employment.

We recognise that open communication and direct engagement between workers and management is the most effective way to maintain good industrial relations.

# Environmental Protection

## Principle

We will comply with all laws and regulations that support the protection of the environment.

## What this means

We will both ensure that our activities are conducted in compliance with all relevant environmental laws and regulations, including in relation to licenses for certain operations, storage and emissions, transport standards, packaging and carbon reporting. You will observe our policies regarding any spillages or releases of products which have an impact on the environment or third parties.

# Bribery and corruption

## Principle

Neither of us will get involved in bribery or any other forms of corrupt activity.

## What this means

Bribery may exist where a person does not act in the best interests of the organisation they represent because of some personal benefit they have received or hope to receive from a third party.

Any gifts or hospitality that we offer or receive must be proportionate and in compliance with our Group Anti-Bribery & Corruption Policy and gifts and hospitality policy.

Any bonus arrangements for sales people that we agree to, must be transparent, fair and agreed to by all the businesses in question, not with any sales people individually.

# Confidential information

## Principle

Neither of us should share confidential information inappropriately or use confidential information which should not be in our possession.

## What this means

While we always want to hear about developments in the marketplace, we do not want you to share with us confidential information that we are not permitted to see, for example about our competitors' sales, prices or commercial plans or information owned by a third party who has not consented to you using that information.

While we can always provide advice and support in relation to your products and services, we will not share with you any confidential information that we may have about your competitors.

Equally, we will not share any confidential information that we have about you with your competitors.

We expect you to act in an equivalent way in relation to disclosing confidential information about our competitors or us.

If either of us receives confidential information that we should not have, we will notify the sender immediately and return or delete the information.



# Data protection

## Principle

We will both collect and use personal information carefully and in compliance with relevant data protection laws.

## What this means

We will collect data about our customers and you may process that data on our behalf. You will always follow relevant data protection laws and ensure that all team members handling data understand that personal data should be handled securely and with respect.

We will work with you to make you aware of our data security expectations. You will let us know immediately if you have any incidents (for example, a data security breach) relating to data you are processing on our behalf.

# Competition (anti-trust) law

## Principle

We will both take all steps necessary to ensure that we are fully compliant with applicable competition (anti-trust) laws.

## What this means

As previously stated, we will not share confidential information about you with any of your competitors. We will also not share with you confidential information we may have about any of your competitors. Equally, you should not share with us any confidential information that you have about our competitors. In turn, you should not share confidential information you have about us with any of our competitors.

It is against the law for us to agree with you what price we will sell your products at or to have any agreement or arrangement that puts a floor on the prices we sell them at. The same also applies to our customers. It is against the law for us to tell them what price they can sell your products at or to require or incentivise them to keep their prices above a certain level.

We operate currently in a single market in the EU, allowing customers to approach any seller they want. This means that while you may appoint us as your distributor for a territory in the EU, it is illegal for us to agree that we will never accept orders where a customer from outside our territory approaches us.

We need to make an independent decision on whether we do business with them.

We will both ensure that we have provided suitable training on relevant competition (anti-trust) laws to relevant employees within our businesses.

# Intellectual property

## Principle

We will not sell products or provide services that deliberately or clearly infringe the intellectual property rights of any third party.

## What this means

We will both respect the intellectual property rights of third parties by only using trademarks, designs and technology that have been legitimately acquired and licensed.

# Product safety, quality and standards

## Principle

Every product we sell must be safe, comply with relevant standards and be accompanied by any legally required product information. We respect the rights of the consumers of our products and services, and value the relationships we have with them.

## What this means

You must ensure that any product you sell us is safe for the purpose for which it is intended and complies with all relevant standards for that product.

You will provide or make available to us relevant product safety documentation, as may be required by law.

You must also ensure that where you have any concerns that a product may be unsafe or not compliant with standards relevant to it, you notify us immediately.

Where relevant, we will work together to satisfactorily address customer concerns.

# Export controls, sanctions and embargoes

## Principle

We will ensure that products we sell are not used in breach of export controls and embargoes that may exist. We will also exercise appropriate diligence to avoid any dealings which breach sanctions.

## What this means

Governments in the UK, elsewhere in the EU and in the US maintain restrictions on doing business with certain countries, parties or industry sectors in some countries.

You must check and advise us if any of the products you sell are subject to restrictions.

# Managing compliance

## Principle

We will have in place appropriate policies. We will ensure that our operations are underpinned by adequate, accurate and securely retained records.

## What this means

In order to achieve compliance with this Code of Practice, we expect you to have in place an appropriate programme that provides management accountability and responsibility; in other words, the right tone from the top.

Your management team should have in place appropriate policies and support managers to communicate the importance of compliance at all levels of the business. Appropriate risk assessments will help identify the most important risk areas affecting your business and the controls best suited to reduce that risk.

In the same way that we engage with you about this Code of Practice, it is your responsibility to communicate your ethical stance to your suppliers, agents and other third parties involved in your business. Keeping records of your contracts, communications and any investigations will be an important part of your programme.

To ensure consistency, the members of your team should receive the training they need to enable them to do their jobs effectively.