

The DCC logo is located in the top right corner of the page. It consists of the letters 'DCC' in a bold, white, sans-serif font. The background of the entire page is a dark teal color with a complex, abstract geometric pattern of overlapping triangles and polygons in various shades of blue and teal.

DCC plc Supplier Code of Practice

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Contents

Introduction	2
Health & Safety	4
Employment & Human Rights	5
Environmental Protection	6
Bribery & Corruption	7
Confidential Information	8
Data Protection & Privacy	9
Competition (Anti-Trust) Laws	10
Tax Compliance	11
Intellectual Property	12
Product Safety & Quality	13
Export Controls, Sanctions & Embargoes	14
Managing Compliance	15

Introduction

DCC is a leading international sales, marketing and support services group. Businesses in our Group work closely with suppliers from all over the world to bring products to market efficiently and effectively.

This reflects our core purpose as a company: to enable people and businesses – including the suppliers of the products we sell – to grow and progress.

"This Code of Practice supports the development of those relationships by setting out certain standards that we expect all of the suppliers we work with to follow."

Our four core values are Safety, Integrity, Partnership and Excellence. We like to build long-term relationships with suppliers who are committed to these values as well. This Code of Practice supports the development of those relationships by setting out certain standards that we expect all of the suppliers we work with to follow.

The development of those long-term relationships requires clear and open communication. If you have concerns that this Code of Practice is not being followed, you should feel free to raise those concerns with the Group business you are dealing with, or please contact the DCC Group Legal & Compliance team on doing-the-right-thing@dcc.ie. 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.

Donal Murphy
Chief Executive

Health & Safety

PRINCIPLE

Ensuring the health and safety of everyone we deal with is fundamental to business performance and long-term business success. No task is so important that you cannot choose to do it safely.

WHAT THIS MEANS

We will always support you when you choose to work safely.

If anyone in your business believes safety is at risk of being compromised, they must feel able to intervene and stop the work.

Our suppliers should comply with all applicable laws and regulations regarding occupational health and safety, and to provide a clean, safe and healthy workplace, designed to prevent accidents, injury and illness during the course of work.

Suppliers working at a DCC Group premises must work in a way that assures their own safety and the safety of others and is in compliance with applicable health and safety requirements including our policies and procedures.

Suppliers should provide their employees, including new or reassigned workers, regular and recorded health and safety training.

Any emergencies that may impact DCC activities must be reported promptly.

You will facilitate reasonable HSE inspections by us. You will also provide us with accurate HSE performance information where we request it.

Employment & Human Rights

02

PRINCIPLE

DCC observes internationally-recognised human rights standards including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We ask our suppliers to do the same.

WHAT THIS MEANS

Specifically, you should ensure that your employees and other workers are:

- Provided with a safe working environment;
- Paid fairly and on time for the work they do;
- Not subject to any form of duress by their employer, such as having to repay large loans or having their passport retained;
- Not discriminated against because of their gender, disability, religion, age, ethnicity, marital status, sexual orientation or any other status protected by applicable law;
- Not subjected to any form of slavery;
- Not under the legal minimum age of employment.

You should promptly advise us if you are not able to meet these standards at any point.

In many countries, national laws set standards that are at least as high as those set out in human rights standards. Where that is the case, national laws should be followed. However, where national laws do not provide a suitable level of protection, human rights standards should be observed. If a conflict between national law and international human rights standards occurs, we expect you to respect national law while endeavouring to protect human rights.

Environmental Protection

PRINCIPLE

We expect you to comply with all laws and regulations that support the protection of the environment.

WHAT THIS MEANS

You will ensure that your activities are conducted in compliance with all applicable environmental laws and regulations, including (1) the use of natural resources such as water, (2) licencing of certain operations, storage and emissions, (3) the safe transport of products, (4) the reuse of packaging and other forms of waste, and (5) carbon emissions.

You must observe our policies and procedures on environmental protection while undertaking work for DCC, including regarding spillages or releases of products that have an impact on the environment or on third parties.

03

Bribery & Corruption

04

PRINCIPLE

You will not be involved in bribery or any other form of corrupt activity.

WHAT THIS MEANS

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

You will maintain and communicate suitable policies in your business that make clear that none of your employees should offer, give or accept any bribe.

Specifically, any gifts, hospitality, sponsorship or other benefits that you offer or receive in the context of the work you do for DCC must be modest and not designed to improperly influence the outcome of any decision.

Confidential Information

05

PRINCIPLE

You will not share confidential information inappropriately or use confidential information that should not be in your 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 receive. And, equally, you must not share with any third party any confidential information that you have about us.

If you inadvertently send us confidential information that we should not have received, you must notify us immediately. And, if you inadvertently share confidential information about DCC with any third party, you must again immediately let us know.

Data Protection & Privacy

PRINCIPLE

You will collect and use personal information carefully and in compliance with relevant data protection and privacy laws.

WHAT THIS MEANS

We may collect information about our employees, customers or other individuals and you may process that data on our behalf. Where this is the case, you must always follow relevant data protection and privacy laws and ensure that all of your employees who handle that information understand that it should be used securely and for legitimate reasons. You must maintain suitable IT and management controls to ensure personal information is properly used.

You must let us know immediately if you have any incidents – for example, a data security breach – relating to information you are processing on our behalf.

06

Competition (Anti-Trust) Laws

PRINCIPLE

You will take all steps reasonably necessary to ensure that you are fully compliant with applicable competition (also known as anti-trust) laws.

WHAT THIS MEANS

As stated in section 5, you must not share confidential information about us with any of our competitors and you must not share with us confidential information that you have about our competitors.

You will ensure that you provide suitable training on relevant competition laws to relevant employees within your business.

07

Tax Compliance

08

PRINCIPLE

You will not engage in or facilitate any deliberate underpayment of taxes that are due.

WHAT THIS MEANS

You will correctly declare all income and be transparent with tax authorities about your transactions.

You will take reasonable steps to prevent your employees, contractors or representatives from facilitating tax evasion by third parties.

You will notify us immediately where you have concerns regarding any action taken by your employees, contractors or agents in relation to your dealings with DCC, or where you suspect that another party in our supply chain may have engaged in tax evasion.

Intellectual Property

09

PRINCIPLE

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

WHAT THIS MEANS

You will 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

PRINCIPLE

We respect the rights of the consumers of the products we sell. Every product you sell us must be safe, comply with relevant standards and be accompanied by legally-required product information.

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

Where relevant, you will work to satisfactorily address customer concerns about the products you sell us.

10

Export Controls & Sanctions

PRINCIPLE

You will strictly comply and without exception conduct your business in accordance with all applicable export controls, sanctions and embargoes laws and regulations.

WHAT THIS MEANS

Some governments maintain restrictions on products (including their components, materials, designs and technology) and may prohibit or require licences prior to supplying controlled products to certain recipients and users. They may also maintain restrictions on doing business with certain countries, industry sectors, organisations or individuals.

You will maintain suitable controls to ensure that the products, whether hardware, software, information and services, you sell comply with applicable export controls and sanctions laws.

You must advise us and provide the export control classification information as well as supporting documentation and/or copy of applicable authorisation or exemptions if any of the products you sell are classified as dual-use products or are otherwise subject to export controls restrictions.

Managing Compliance

12

PRINCIPLE

You will have in place appropriate internal policies and procedures to cover your legal and ethical obligations, including the areas covered in this Code of Practice. You will ensure that you keep adequate, accurate and secure records so you can demonstrate compliance.

WHAT THIS MEANS

We expect you to have in place an appropriate set of internal controls to ensure that you meet the standards set out in this Code. These controls should be supported by clear leadership on ethics and compliance matters from senior people in your business.

Keeping records of your internal controls, such as risk assessments, policy communications, training and other internal communications, is important because it allows you to prove the controls you had in place if there are problems in the future.

In the same way that we engage with you about the subjects covered in this Code, it is your responsibility to communicate your policy on those subjects to your suppliers, representatives and other third parties involved in your business.

We will take suitable steps where a supplier does not follow the standards set out in this Code of Practice. This may include not placing any further orders and the termination of our agreement.



DCC

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