

### Flogas NI (part of DCC Energy Ltd)

### Modern Slavery Act 2015 Statement for Year Ending 31 March 2016

#### **Our Policy**

DCC Energy Ltd is opposed to slavery and human trafficking in any part of our business or our supply chain. We are therefore committed to ensuring that we have adequate procedures in place to identify and prevent these practices.

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

#### **Our Business**

DCC Energy Ltd sells both oil and gas products. Oil and Gas activities are run as two separate business units within the single legal entity. The gas business trades as Flogas NI. Flogas NI is a distributor of LPgas in the energy sector. We own a Marine Terminal in Belfast to which we import LPgas. LPgas is distributed to our customer base in bulk and cylinder form. Seasonal work can be a feature of the industry in which we operate. More information on our business is available at <a href="https://www.flogasni.com">www.flogasni.com</a>.

We are a part of the DCC Group. DCC is an international sales, marketing, distribution and business support services group. Its headquarters are in Dublin, Ireland and it is listed on the London Stock Exchange. DCC currently has operations in 15 countries and employs over 10,500 people. More information on the DCC Group is available at <a href="https://www.dcc.ie">www.dcc.ie</a>.

#### **Our Structure**

Our business operates in Northern Ireland with a sister company in the Republic of Ireland. We also have a sister company which retails Natural Gas in both Northern Ireland and in the Republic of Ireland.

We supply bulk gas to both business and residential customers. Our business customers operate in many different market sectors including, hotel, restaurant, industrial, agricultural and transport. We also distribute bottle gas through a network of third party retail outlets. Our gas is sold under the 'Flogas' and 'Ergas' brands.

#### **Our Supply Chains**

All of the products we use are sourced from reputable suppliers who are based in the UK or in other parts of the EU.

# Our Policies on Slavery and Human Trafficking

The DCC Group *Business Conduct Guidelines* set out our Group commitment to acting ethically and with integrity towards our employees and in all our business relationships. In addition, the DCC Group *Supply Chain Integrity Policy* sets out the approach taken by every business in the DCC Group to ensure that all the products we sell meet applicable legal and ethical standards. Both of these documents are available at

## http://www.dcc.ie/sustainability/our-policies.aspx.

Our policy on slavery and human trafficking is set out at the commencement of this statement.

The requirements of our Group *Business Conduct Guidelines*, Group *Supply Chain Integrity Policy* and our own policy are reflected in the more detailed policies and procedures that we have in DCC Energy Ltd. Over the course of the financial year ending 31<sup>st</sup> March 2017 we will be putting in place additional controls in this area, by reviewing our current compliance processes and making improvements where necessary.

## **Procedures to Prevent Slavery and Human Trafficking**

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

- Assess potential risk areas in our supply chains;
- Monitor potential risk areas in our supply chains on a periodic basis;
- Use bespoke contract terms or our standard terms and conditions, where possible.

In addition to the steps we currently take and to the policies referred to above, we will further enhance our processes and mitigate the risk of slavery and human trafficking occurring in our supply chains by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks.

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

### **Training**

To ensure a suitable understanding of the risks of modern slavery and human trafficking in our business and our supply chains, relevant directors and employees in our business will participate in workshops with other businesses in the DCC Group over the course of the financial year ending 31<sup>st</sup> March 2017.

# **Assurance and Key Performance Indicators**

We report on compliance with the DCC Group *Business Conduct Guidelines* and *Supply Chain Integrity Policy* every six months.

We will develop and monitor suitable key performance indicators to measure our compliance with our Group and internal policies in this area.

#### **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 ending  $31^{st}$  March 2016.

**Managing Director** 

Flogas NI (part of DCC Energy Limited)

8<sup>th</sup> August 2016