

**DO THE
RIGHT
THING**

HELP US
PROTECT
YOU



**CODE OF
CONDUCT**

DCC

FINDING YOUR WAY ROUND

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CHIEF EXECUTIVE'S INTRODUCTION

“There is no conflict between acting with integrity and high standards of financial performance. The best companies in the world are committed to excellence in everything they do.”



The trust of the people we deal with – our colleagues, customers, suppliers, shareholders and communities – is one of the most important assets we have.

That trust has been built over many years, through the efforts of thousands of people across our business. It has been built by being reliable, honest and fair – by always acting with integrity. That integrity is one of the core values of the DCC Group.

But our reputation for integrity and the trust of our stakeholders can be easily undermined, particularly if we are involved in illegal or unethical practices. The actions we all take every day can have far wider consequences if they fall short of the standards – whether they are legal or ethical – that we are expected to achieve.

This is why our shared commitment to acting with integrity, to high standards of business ethics and to doing the right thing, is so important. We must all be committed to meeting those standards. But we must also be very clear that there is no conflict between doing the right thing and high standards of financial performance. In fact, the two are closely related: the most successful companies in the world are generally those with the strongest commitment to excellence in everything they do.

This Code of Conduct sets out our collective and individual commitment to doing the right thing. It provides a summary of the key legal and ethical challenges that we may face in our jobs and advice on how to address them. It explains how we can ask questions or raise a concern. This Code is an essential tool for all of us.

Doing the right thing will not always be easy. We all face pressures to hit targets and deadlines and to meet customer or supplier expectations. The laws and regulations that apply to our work may sometimes be complex. But none of us should ever allow those pressures to undermine our commitment to acting in a way that is legal and ethical.

By following this Code, by exercising your good judgement, and by asking for help if you are not clear how to proceed, you will be doing the right thing. This will benefit you and everyone you work with. We must all follow this Code in our work. We must also encourage our colleagues to do so where needed. And, if we think that something wrong is happening, we must raise a concern.

If you are in doubt about the right course of action, always ask. If you have a concern, always raise it. You will always be supported for doing the right thing.

Donal Murphy

Chief Executive

WHEN DOES THIS CODE APPLY?

This Code applies to directors and employees of DCC plc and every business in which DCC plc has a controlling interest. This includes all part-time, fixed-term and agency employees. Businesses in which DCC plc has less than a controlling interest are encouraged to adopt this Code.

Third parties representing any business in the DCC Group should be asked by the relevant DCC business to confirm that they will follow the standards set out in this Code.

All references to "DCC", "Group", "the business", "we", "us", and "our" in this Code can be read accordingly.

WHAT ABOUT OUR OTHER POLICIES AND PROCEDURES OR OTHER REQUIREMENTS?

This Code applies to all our activities. In many of the areas covered, we will have more detailed policies and procedures in place, whether across the Group or in individual businesses. Those policies and procedures operate in addition to this Code; they add detail to the general principles set out here. In some cases those policies will set higher standards than those contained in this Code. If that is the case, the higher standards should always be followed. More information on our Group policies is available at <http://www.dcc.ie/responsibility/our-policies>

Nearly all the requirements of this Code are based on laws and regulations that apply to our activities. In some countries where we do business, the law may require us to meet higher standards than those required by this Code. If that is the case, then the legal standard must be met. We must always work within the law.

OUR COMPLIANCE PRINCIPLES

This Code is based on the simple principle that, across the DCC Group, in everything we do, all of us must Do the Right Thing. This means that we comply with all the legal and regulatory standards that apply to our activities. But it also means more: we will always aim to follow best practice and to act fairly in whatever we are doing.

Ultimately, it is important that we take responsibility for our own actions. This means that we should all make sure we Know our Stuff – both the contents of this Code and any more detailed internal policies and procedures that apply in our businesses to the work we do.

Do the Right Thing also means that we Stop and Ask if we are not sure how to act. We can ask for advice from our line manager or someone else in the business. Or we can contact the Legal & Compliance team.

Raise a Concern means that if we think something wrong is happening we tell someone about it. More details on how to do this are set out on pages 8 to 11.



DO THE RIGHT THING



KNOW YOUR STUFF



STOP AND ASK



RAISE A CONCERN

WHAT IS EXPECTED OF US?

We must all:



Make sure we Do the Right Thing every day – not just by following the laws and internal policies and procedures that apply to our jobs but also by ensuring our actions are consistent with best practice and our own values.



Make sure we Know our Stuff – this Code as well as any other laws and internal policies and procedures that apply to our jobs.



Stop and Ask if you are not sure how to Do the Right Thing. You can ask for advice from your line manager, someone else in the business or the Legal & Compliance team.



If you think that something wrong is happening in our business, you must raise a concern. More details on how to do this are set out on pages 8 to 11.

WHAT IS EXPECTED OF MANAGERS?

In addition, managers in every business in the Group must:

- Create a culture in which every employee knows they must always Do the Right Thing, Knows their Stuff, is comfortable to Stop and Ask if they don't know what to do and will Raise a Concern if they think something wrong is happening.
- Ensure that business objectives are never achieved through improper means.
- Take compliance into account when evaluating and rewarding employees.
- Investigate potential compliance breaches and take disciplinary action where they are found.
- Consult with the Legal & Compliance team immediately in relation to any possible material compliance breaches.

WHAT HAPPENS IF I DO NOT FOLLOW THIS CODE?

Directors and employees who do not follow this Code are subject to disciplinary action, up to and including dismissal. Examples of behaviour that may result in disciplinary action include:

- Deliberately breaching this Code.
- Asking or encouraging others to breach this Code.
- Failing to report a clear breach of this Code.
- Retaliation against a person who has raised a concern.

RAISE A CONCERN

IT'S THE
RIGHT
THING
TO DO



If any of us has a concern that something wrong is happening in work, we have a responsibility to raise a concern. Doing nothing is not an option. This protects each of us, our business and our stakeholders. We must always Do the Right Thing.

There are several ways to do this:

Within your Business

Contact your Line Manager, the HR Manager, HSE Manager, Compliance Coordinator or a member of the leadership team.

Contact the Head of Group Legal & Compliance

Email, call or write to Group Legal & Compliance in DCC at:
doing-the-right-thing@dcc.ie
+353 1 2799 497
Group Legal & Compliance,
DCC House
Leopardstown Road
Foxrock
Dublin 18
Ireland



Contact Safecall, an Independent Service for Raising Concerns

You can use the following Freephone numbers:

| Country | Freephone number |
|----------------------|------------------|
| United Kingdom | 0800 915 1571 |
| Ireland | 1800 812740 |
| France | 00800 72332255 |
| Austria | 00800 72332255 |
| Germany | 00800 72332255 |
| Sweden | 0850 252 122 |
| Denmark | 00800 72332255 |
| Norway | 00800 72332255 |
| Poland | 00800 72332255 |
| Belgium | 00800 72332255 |
| The Netherlands | 00800 72332255 |
| China Unicom | 10800 7440605 |
| China Telecom | 10800 4400682 |
| Hong Kong | 3077 5524 |
| USA | 1 866 901 3295 |
| Spain | 00800 72332255 |
| United Arab Emirates | 8000 4413376 |

This service is available 24 hours a day, every day of the year.

You can use their website:

www.safecall.co.uk/file-a-report

You can email: **dccgroup@safecall.co.uk**

You will be supported if you raise a concern about a legal or ethical issue. Retaliation against a person who raises a concern is prohibited.

WHO ARE SAFECALL?



Safecall are a business who provide an independent service allowing employees to raise concerns about legal or ethical issues within the business where they work. They are not part of the DCC Group.

DO I HAVE TO USE ENGLISH?

No. If you call, you will be able to speak in your native language, through an interpreter. Their website operates in over 40 languages.

WHAT HAPPENS IF I RAISE A CONCERN?

You will be asked to provide some relevant information about your concern so that it can be properly investigated. If you do not know the answer to any question, you can simply say so. Calls to Safecall are not audio-recorded.

A report on your concern will then be sent to the Head of Group Legal & Compliance in DCC.

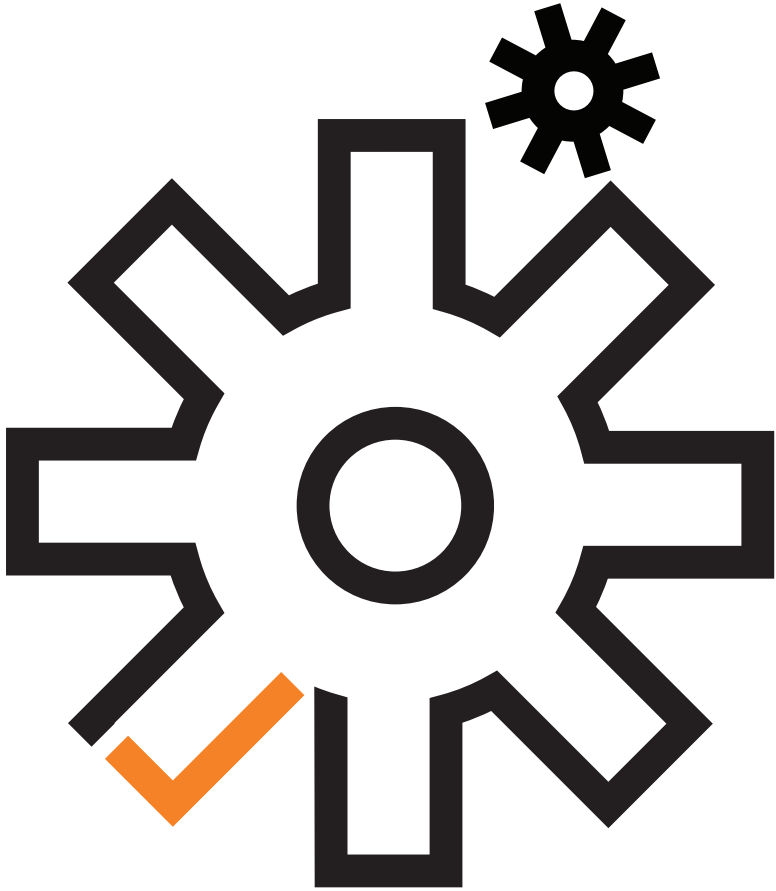
All concerns about legal or ethical issues will be treated seriously and discreetly. They will be investigated and, where needed, corrective action will be taken.

If you have raised a concern, you can, if you want, be advised afterwards about what action has been taken.

It is important that you raise a concern if you think that something is being done illegally or unethically. Any form of retaliation or discrimination against a person who has raised a concern will not be tolerated. Any such action will be treated as a serious disciplinary matter. If you see any retaliation or discrimination taking place, please report it immediately.

CAN I RAISE A CONCERN ANONYMOUSLY?

If you want, and it is allowed under the laws of your country, you can raise a concern with Safecall anonymously. When you call them, you will be asked if you want to leave your name and if you want those details to be provided to DCC. If you do not want to give your name or do not want it to be passed to DCC that will be respected.



OUR WAYS OF WORKING

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01. WORKING SAFELY

Why is this important?

There is no acceptable level of accidents in work. Nothing we do is so important that it cannot be done safely – every time.

So we must all make sure that we work safely and do not put ourselves, our colleagues, customers or the wider public at unnecessary risk.

This includes following the health & safety policies and procedures that apply to our jobs. But it also means that we ask if we are not sure how to do something safely and raise a concern if something is not being done safely.

Our Group Health & Safety Policy makes clear that our goal is zero accidents. We all have a part to play in achieving this.

What's required?

- Follow all the health & safety policies and procedures that apply to your work.
- Attend any training that is provided on those policies and procedures.
- Stop and Ask if you see something that can be improved or if you're not sure how to do something safely.
- Managers and directors bear a particular responsibility to provide clear leadership on health & safety issues.

What to look out for

- Any unsafe practice – even if it is being sanctioned by a member of management.
- Any risk that has not already been spotted and where improvements can be made.





REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

My boss has just told me to do something and I know it's not safe.

Q. Should I just go ahead?

A. No. If you are not satisfied that an activity is safe, do not proceed. Discuss the issue and agree how the work can be done in safe manner. You can always raise a concern if you need to.

We're really busy at present and I just don't have time to follow our normal safety routines.

Q. Presumably the most important thing is to get the orders out?

A. The most important thing is to ensure that all our work is done safely. Nothing takes priority over this.

02. FAIR EMPLOYMENT PRACTICES

Why is this important?

Fair employment practices mean more than just meeting our legal obligations.

We are committed to providing work environments which are open and fair, where everyone is treated with respect and where differences are embraced.

We are committed at a minimum, that all of our businesses comply with all applicable laws on equal treatment, wages, working time, leave, freedom of association, the protection of our employees' privacy and personal information and other working conditions.

What's required?

- Ensure that no employee or job applicant is adversely treated because of their age, gender, pregnancy, marital status, sexual orientation, religion, race, disability, union membership, political affiliation, or other protected characteristic. Make all employment decisions based on merit and business considerations alone.

- Never bully or harass any person in the workplace and never tolerate any action that could be seen as harassment or bullying.
- Follow all the detailed internal HR policies and procedures that apply in your business.
- Ensure that the privacy of all employees is respected and that personal information about employees is kept secure and used only in appropriate ways. Follow the internal policies and procedures on employee information that apply in your business.

What to look out for

- Any behaviour that creates a hostile or intimidating workplace such as inappropriate jokes or comments.
- Discrimination against any person based on their age, gender, pregnancy, marital status, sexual orientation, religion, race, disability, union membership, political affiliation, or other protected characteristic.
- Information about our employees that is not being kept securely or is being accessed or used inappropriately.



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I know that another employee is being bullied, but I am not sure I should really get involved.

Q. Maybe I should let someone else raise it with HR?

A. You should raise this with HR. It's the right thing to do. Don't assume that someone else will. HR will ensure that the matter is investigated and action taken.

03. CONFLICTS OF INTEREST

Why is this important?

People should make decisions in the best interests of the organisation they work for. Where they have personal interests that are or could be seen to be in conflict with the interests of that organisation, a conflict of interests arises.

It is not illegal or a breach of policy to have a conflict of interest. However, where a conflict of interest does arise, it must be disclosed.

What's required?

- If a conflict of interest arises, disclose it to your line manager or other appropriate person in the business.
- Do not make or take part in any decision if you are subject to a conflict of interest, unless express approval for this has been given.
- Do not accept external roles or appointments if they will or could be seen to be in conflict with your existing job. The business where you work may have more detailed policies and procedures on this.

- Never make any personal gain or benefit by misusing your position in the business.

What to look out for

- Employing, promoting or supervising family members or close friends.
- Gifts, hospitality, discounts or other preferential treatment from suppliers, service providers or customers which do or could be seen to influence your independence.
- Using business assets for personal use.



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I'm in charge of appointing a new supplier. My husband is a manager in one of the companies that is competing for the business.

Q. Should I disclose this?

A. Yes. Depending on the role your husband has in the other company, this is or could be seen to be a conflict of interest. You should discuss this with your line manager in the first place.

04. BRIBERY AND CORRUPTION

GIFTS, HOSPITALITY AND DONATIONS

Why is this important?

People should make decisions in the best interests of the organisation they work for and not because they have been influenced by some personal benefit that they have been given or promised.

Where a person is given money, a gift or some other personal benefit there is a risk that their decisions will be wrongly influenced - in other words corrupted. A bribe is any personal benefit given in return for, or in expectation of, preferential treatment.

Giving or receiving bribes is a criminal act in every country where we do business. Laws such as the Bribery Act 2010 in the UK mean that people who give or receive bribes can be fined or even sent to jail.

Businesses also have a legal obligation to check that their representatives, such as sales agents and advisors, are not involved in bribery.

Clearly, if we are doing business in a country where bribery is a common problem, we need to take additional precautions. This will include doing background checks on the people we are dealing with.

But in all circumstances, we have zero tolerance for any form of bribery and corruption. The DCC Anti-Bribery and Corruption Policy sets out our position on this in further detail. In addition, every business in the Group will have more detailed policies and procedures in this area, including on when gifts, hospitality and donations are allowed.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

What's required?

- Never offer, request, give or accept any bribe. This includes not making “facilitation payments” – small payments to public officials to speed up administrative functions.
- Follow the DCC Anti-Bribery and Corruption Policy and the more detailed policies and procedures on the giving and receiving of gifts, hospitality and donations that apply in your business.
- If we are appointing a sales agent or other intermediary to do work on our behalf, make sure we carry out suitable background checks and put controls in place so that they do not get involved in bribery on our behalf.
- Never offer or provide sponsorship or charitable donations using business assets or on behalf of the business without the express approval in writing from the Managing Director of the business where you work.
- Never offer or make political donations or provide support for political activities using business assets or on behalf of the business without express approval in writing from the Divisional Managing Director.

- Our contracts with sales agents or other intermediaries must require that they do not engage in bribery in connection with dealings that they undertake on our behalf.

What to look out for

- Giving or receiving gifts or hospitality that could be seen as excessive or inappropriate.
- Doing business in countries which have a problem with corruption, without having done suitable background checks and having additional controls in place.
- Background checks that indicate that a third party has been involved in bribery or any other form of illegal activity or is closely connected with government parties.
- Agents or other third parties who are paid significant fees by the business to provide vague services.

**04. BRIBERY AND
CORRUPTION
GIFTS, HOSPITALITY
AND DONATIONS**

A supplier has offered to bring me to a Champions League match if I place a big order before the end of the month.

Q. Should I disclose this?

A. Yes. This appears to be highly inappropriate. You should raise this immediately and make no decision on the order in the meantime.



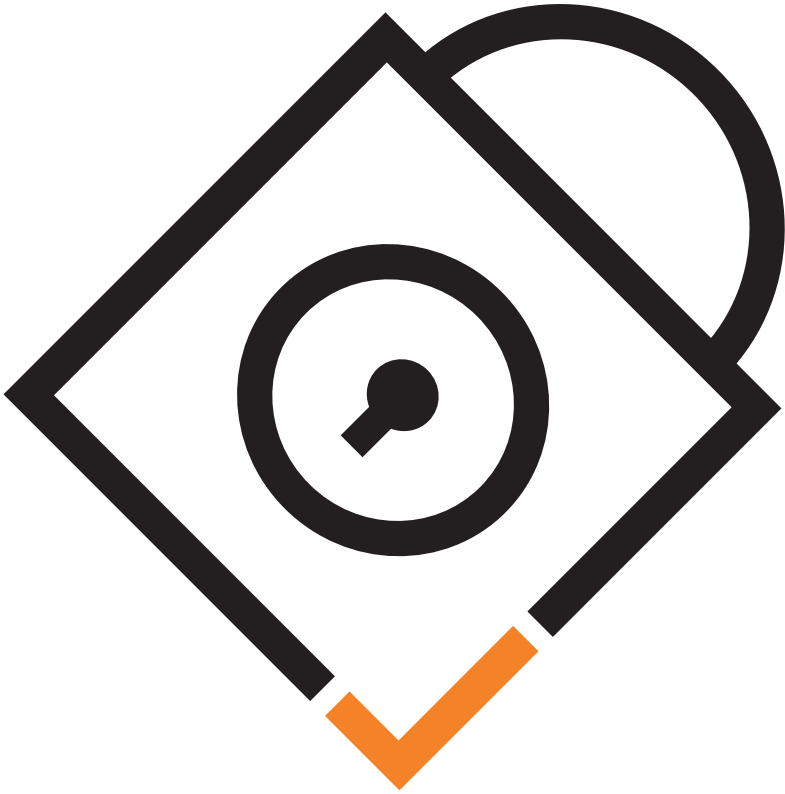
REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

We're trying to win some new business from a big customer. The person I am dealing with has said our chances will improve if we sponsor a local football team that he manages.

I know it's a good cause, but I am still a bit uncomfortable.

Q. Should I raise it internally?

A. Yes. While we may provide sponsorship in some circumstances, with the approval of the Managing Director in your business, this request appears to be completely inappropriate. You should raise a concern.



PROTECTING OUR ASSETS

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PROTECTING OUR ASSETS

05. BUILDINGS, VEHICLES AND IT

Why is this important?

We are all responsible for taking care of the assets of the business such as buildings, vehicles and IT. These assets should not be deliberately or recklessly damaged, put to personal use unless this is expressly allowed by our internal policies, or disposed of at an undervalue.

In particular, failing to maintain or breaching good IT standards can expose the business to fraud or loss of confidential or personal information.

What's required?

- Follow all internal policies and procedures on the use of business assets.
- Ensure that IT security is maintained.

What to look out for

- Weak or missing controls to prevent assets being misused, damaged or lost.
- Business assets being sold at below market value.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

I know our new laptops are not encrypted and I am a bit concerned that if they were mislaid a lot of important information would be lost.

Q. What should I do?

A. You should raise a concern about this. It's important that we protect the personal and/or commercially sensitive information on laptops and other devices. Suitable security should be in place for all IT.

06. INTELLECTUAL PROPERTY

Why is this important?

Many of the businesses in the Group own valuable brands and other forms of intellectual property. We may also have valuable databases that contain information about suppliers or customers.

What's required?

- We should protect any valuable brands or other intellectual property that we own, for example by registering brands as trademarks.
- Consult with Group Tax and Group Legal & Compliance before any new brands or other intellectual property are developed.

What to look out for

- Brands or other intellectual property developed by the business which has not been protected through registration.
- Launching a new brand or product that we have invented before checking if it can be protected through registration.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

We're developing a new brand and want to launch it soon.

Q. Should we check whether this can be registered as a trademark or just go ahead and look after registration afterwards?

A. You should check this out as soon as possible. There could be a problem if we launch the brand and it turns out to breach another party's trademark.

07. ACCURATE RECORDS AND REPORTS

Why is this important?

In a diverse group such as DCC, maintaining accurate records and producing reliable reports is essential. It allows us to run the business effectively and to report to our shareholders and other stakeholders accurately.

What's required?

- Follow all our internal accounting and financial reporting procedures, as well as generally accepted accounting principles (GAAP) and relevant legal requirements.
- Comply with all our internal financial controls.
- Produce reports to management that are accurate, timely and complete.
- Each business in DCC must have in place and accurately complete a monthly checklist which fully reflects its financial reporting procedures.
- Ensure that all applicable taxes are paid on time and that suitable controls are in place to ensure tax compliance and prevent tax evasion.

- Keep records well organised and comply with any applicable document retention policies.
- Always keep information if advised that it may be needed for an investigation or for other legal reasons.

What to look out for

- Inaccurate recording of financial or business performance.
- False or misleading reporting.
- Financial policies or procedures not being followed or being circumvented.
- Disorganised retention or disposal of records.



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I'm being told to include numbers in a management report that I know are wrong.

Q. Should I go ahead?

A. No. You should never be asked to include inaccurate numbers or other inaccurate information in any report. You should raise a concern on this as soon as possible.

PROTECTING OUR ASSETS

Why is this important?

Our reputation forms an important asset of the business. Therefore, we must all take care not to damage that reputation through unplanned communications.

And because shares in DCC plc are publicly listed, we are required to follow Stock Exchange rules on making announcements about significant developments such as acquisitions.

08. PROTECTING OUR REPUTATION AND MAKING ANNOUNCEMENTS

What's required?

- Do not discuss or comment on the activities of the business on any form of social media and follow the social media policy that applies in your business.
- Do not give any media interviews or make any other comment about Group activities to the media without prior approval from the Divisional Managing Director.

What to look out for

- Information or comments about our business being made on social media.
- Interviews being given about Group activities without approval from DCC.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

A friend of mine who is a journalist has just asked me for some “off the record” views on an acquisition that we’ve just announced.

Q. If it's off the record is it ok?

A. No. Discussing or commenting on the activities of the Group should only be done with the approval of the Divisional Managing Director. The journalist should be referred to the relevant person in the business, who will be able to assist them further.



DEALING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

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DEALING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

Why is this important?

Our stakeholders include our customers, suppliers, shareholders, advisors, regulators and other public bodies, and the communities where we live and work.

We work hard to develop and maintain the trust of our stakeholders. We must not undermine this by acting in a way that is improper or illegal.

What's required?

- Keep the promises we make and fulfil all our contractual commitments fairly and honestly.
- Work to resolve any disputes amicably at the earliest possible stage.
- Make sure all our communications are clear, honest and accurate.
- Do not actively disparage our competitors: focus instead on what we can offer.

09. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND OTHER STAKEHOLDERS

- Protect the relationship by making sure everything is done legally and ethically – even if someone is asking us to do something different.
- Respond accurately and promptly to requests for information from regulatory bodies.
- Contact Group Legal & Compliance if any regulatory investigation is threatened or starts.

What to look out for

- Commitments to our suppliers, customers or other stakeholders that are not being kept.
- Communications that are unclear or inaccurate and so likely to cause problems in the future.
- Dealings with any regulatory bodies that are not being managed properly.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

I've had a number of complaints about the service we're providing. I haven't been able to resolve them, but I'm sure the whole thing will just blow over.

Q. There's no need to mention it to my manager is there?

A. If customers are complaining about the service we are providing it's important that your line manager and perhaps other members of management know about it. If complaints are not handled properly they can lead to more serious events, such as legal action or investigations by regulators.

DEALING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

Why is this important?

Where we are dealing with consumers - that is, members of the public as opposed to businesses - we have a general legal obligation under consumer protection law to make sure that all our communications are not confusing or misleading.

We are also required to provide consumers with certain levels of information about the products and services they buy from us, including the price. And if consumers buy those products or services online, over the telephone, or otherwise away from a business premises, they will generally have the right to change their mind – and we need to explain this clearly to them.

What's required?

- All our dealings with consumers should be fair, clear and honest.
- Our communications with consumers, such as advertising or marketing communications and our websites, must not be confusing or misleading.

10. PROTECTING CONSUMERS

- Consumers must always know the price of the products they are buying from us.
- Consumers must be clear on our terms of business.
- If you are selling to consumers, follow any sales training or other policies and procedures that apply.
- Discuss new websites that allow sales to consumers with Group Legal & Compliance as they are being developed.
- Ensure complaints from consumers are handled effectively and quickly – and raised at a more senior level in the business if necessary.

What to look out for

- Sales to consumers where the price is not clear.
- Sales made to consumers where our terms of business are not provided.
- Advertising, marketing materials or websites that are confusing or misleading.
- Complaints that are not being addressed properly.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

We've just launched our new website. Our customers seem to really like it and are already placing orders. I haven't had time to include our terms and conditions yet, but I'll get to it eventually.

Q. Is there a problem?

A. If the website can be used by consumers, then it must contain a clear statement of what terms and conditions apply to their purchases. The website needs to be updated immediately.

DEALING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

Why is this important?

In our business - as well as holding information about our employees (see pages 16 and 17) - we may have personal details about members of the public or other people we deal with. Examples are their names and addresses, telephone numbers or order histories.

We can use this information for reasonable business purposes but we should not keep it longer than we need to. And for as long as we keep it, we must keep it safe and well organised and not share it with other organisations unless we have permission.

If we have information about any person, they are entitled to get a copy of it.

These are legal requirements under data protection laws in most countries where we do business, including the General Data Protection Regulation in the EU.

Businesses across the Group will have detailed policies and procedures on how personal information should be collected and used.

What's required?

- Follow the DCC Data Protection Policy and the more detailed policies and procedures

11. PROTECTING PERSONAL INFORMATION

on protecting personal information that apply in your business.

- Protect personal information and delete it when it's no longer needed.
- Use information only in ways that the person in question would expect or to which they have agreed.
- Do not share personal information unless the recipient has a need for it and will look after it.
- Report any loss of personal information to your line manager and to Group Legal & Compliance as soon as you become aware of it.
- Follow all the policies and procedures in your business on data protection and data retention.

What to look out for

- Customer databases and other customer information that are not properly protected.
- Customer information being used in ways that the customer would not expect or to which they have not agreed.
- Requests for information from people whose information we hold that are not being dealt with properly and in line with our internal policies and procedures.



REMEMBER. If something is not right, don't just ignore it. See pages 8 to 11 on what you can do. You will always be supported if you Raise a Concern.

I've mislaid a USB key with customer details on it. I got it from IT, but I am not sure if it was encrypted.

Q. Should I mention it?

A. You should raise a concern about this immediately. The USB key should be encrypted but you should not take a chance on this. And even if it is, it might still be necessary to take further steps to protect the information.

12. PROTECTING CONFIDENTIAL INFORMATION

Why is this important?

Where we deal with other businesses, it is essential that confidential information is kept secure and not shared without permission. This applies to information about us as well as to information about businesses we deal with.

If you are in any doubt about whether information can be given to a third party, assume that it is confidential and check.



What's required?

- Keep all confidential information secure and do not disclose it to people who do not need to receive it.
- If you receive confidential information in error, do not use it and, if possible, return it to the person who sent it.
- If you are sending confidential information outside the business, clearly mark it "Confidential".
- Ensure our customers, suppliers and advisors keep any commercially sensitive information about us confidential.
- Never use confidential information about a former employer.



What to look out for

- Confidential information that is not kept secure.
- Confidential information sent using unencrypted means.
- Confidential discussions that could be overheard.



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My colleagues and I were discussing a potential new customer on the train yesterday.

Q. Surely no one would be interested in listening to that?

A. Commercially sensitive discussions should never be held in places where they might be overheard, such as on trains or planes.

13. AVOIDING INSIDER DEALING

Why is this important?

DCC plc is listed on the London Stock Exchange and is subject to the Market Abuse Regulation. This means that no shares or other securities in DCC may be bought or sold on the basis of inside information. This is known as insider dealing and it is a serious crime.

Inside information is any commercially sensitive information about a company which, if made public, could affect a person's decision to buy or sell shares in that company.



What's required?

- Never benefit or allow someone else to benefit from inside information that you have because of your work in DCC.
- If you are a senior manager or director and included on DCC's Insider List, do not buy or sell shares in DCC plc other than in accordance with our Share Dealing Code.
- If you are not sure whether any information that you have is inside information, do not take a chance: contact Group Legal & Compliance or the Group Company Secretary for advice.



What to look out for

- The use or disclosure of inside information before it has been publicly announced.
- Buying or selling shares in DCC plc or another listed business or advising anyone about buying or selling those shares, if you have access to inside information.



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We're looking at buying one of our competitors. If we can buy it, the DCC share price will probably go up. My brother has asked me if buying shares in DCC is a good idea.

Q. What can I tell him?

A. You cannot make any comment or recommendation about the purchase or sale of shares in either DCC or, if the competitor is a listed company, in that business.

DEALING WITH OUR CUSTOMERS AND BUSINESS PARTNERS

Why is this important?

We sell many billions' worth of products every year. It is essential therefore that we know that those products are of good quality, are what our customer ordered, and meet all applicable legal and regulatory standards.

In particular, where we are importing products from outside the EU, we need to make sure that those products meet applicable EU laws and standards and qualify to have the CE mark on them.

We are also committed to ensuring, as far as practicable, that the products bought and sold by DCC Group businesses are manufactured and transported without any:

- Bribery or any other form of corrupt practice;
- Failure to comply with environmental protection laws;
- Exploitation of workers, including, but not only, through slavery and human trafficking;
- Unsafe working practices;
- Breach of applicable trade sanctions or export control laws;
- Money laundering and terrorist financing;
- Failure to comply with applicable tax laws.

14. PRODUCT QUALITY AND SUPPLIER INTEGRITY

What's required?

- Follow the DCC Supply Chain Integrity Policy and the more detailed policies and procedures on appointing suppliers and selecting new products that apply in your business. These are in place to ensure that we only buy from reputable suppliers and only sell products that are safe, of good quality and comply with all applicable legal and regulatory standards.

What to look out for

- Suppliers being appointed or products being ordered before suitable risk assessments have been done and suitable controls put in place.
- Products that are not safe, do not meet manufacturing, packaging or labelling standards or are otherwise not of good quality.
- Suppliers who may not be treating their employees or other workers properly.
- Complaints, adverse reports or returns from customers that could indicate other products are not up to standard.
- Products being delivered to customers which are not what those customers have ordered.



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I'm under pressure to release products to our customers even though we haven't finished our quality checks. I'm confident that everything will be ok.

Q. Should I go ahead?

A. No. It's essential that, where checks on products are needed, they are always followed. Just because you are confident, does not mean that there will not be a problem.



PROTECTING THE WIDER COMMUNITY

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15. FAIR COMPETITION

Why is this important?

Our customers benefit when they have a range of businesses to buy from – in other words when there is a healthy level of competition. Equally, we benefit when there is a range of businesses competing to sell their products and services to us.

Competition law protects the buyers of products and services by preventing certain types of agreements and arrangements between businesses that are bad for competition.

Competition can be damaged where:

- Competing businesses reach any agreement or understanding on prices or on other trading conditions, whether that agreement is written down or not.
- Competing businesses discuss the markets they operate in or share or collect commercially sensitive information about each other.
- Businesses are not free to decide their own selling prices.
- Businesses are not free to accept orders from customers anywhere in the EU or are not free to sell or advertise products over the internet.

- Businesses have a large market share and no effective competitors and use this advantage unfairly.

The penalties for breaching competition law are very high: millions in fines for the business and, in many countries, jail time for individual directors and employees.

Every business in the Group will have more detailed policies, procedures and training available in this area. If you negotiate with suppliers or business customers or meet our competitors it is essential that you are familiar with relevant competition law rules.

What's required?

- Where relevant, attend more detailed training and review, understand and follow our policies and procedures on competition law.
- Never discuss or have any arrangement or agreement, whether written or verbal, express or implied, with a competitor on:
 - Prices
 - Promotional plans
 - Where we buy from or sell to
 - Who we buy from or sell to



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- The range of products that we buy or sell
- Terms we have in place with suppliers or customers
- Tenders or bids for new business
- Production volumes or capacity
- Sales levels
- Market shares
- Never exchange any commercially sensitive information with a competitor, whether directly or through a third party such as a customer, supplier or advisor.
- Never have any arrangement or agreement with a supplier that sets a minimum level on the price we will sell their products at, that prevents us from accepting orders from customers anywhere in the EU or from selling their products on the internet.
- Never have any arrangement or agreement with a customer that sets a minimum level on the price they will sell at, that prevents them from accepting orders from customers anywhere in the EU or from selling on the internet.
- Ensure a suitable response is sent back to any risky communications we receive, whether from suppliers, customers, competitors or any other party.
- Do not use phrases in any documents (whether internal or external) which sound like we are trying to act in a way that is bad for competition, such as "crushing the competition", "dominating the market" or "our competitors will follow our prices if we move first".
- Take legal advice if your business has a share of more than 40% of any market.

What to look out for

- Contacts with competitors that are or could even be seen as suspicious.
- Commercially sensitive information being exchanged between competitors, directly or indirectly.
- Industry association and similar meetings where prices or other trading conditions are mentioned.
- Restrictions being imposed by suppliers about resale prices, sales within the EU, online sales or sales to particular customers.

**I've just been at a
trade association
meeting where prices
were discussed.**

Q. No one else seemed to be concerned so maybe there's no problem?

A. There is a problem. You need to raise a concern about this immediately and ensure that legal advice is taken.



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We've just won a new contract and this new business will give us a market share of over 40%.

Q. Should I take further advice?

A. Yes. Whenever we achieve a large market share, we should check whether any additional competition law rules apply to our activities.

16. MONEY LAUNDERING AND TERRORIST FINANCING

Why is this important?

Criminals sometimes try to use businesses to turn the proceeds of crime into legitimate assets. They might do this for example by buying products from us that they can easily sell on.

In addition, legitimate funds are sometimes used to support or finance terrorist activity – sometimes called “reverse money laundering”.

Businesses are required to take steps to prevent transactions like this and to notify the authorities if they have a reasonable concern about something that is taking place.

Allowing or failing to prevent money laundering and terrorist financing is illegal in every country where we do business.

What’s required?

- Ensure that we know the suppliers and customers we are dealing with. If you think that a transaction may be in any way illegitimate, raise it with the Finance Director in your business immediately.
- Follow all internal policies and procedures on the approval of new customers and suppliers, including checking trade and credit references.

- Follow all internal policies and procedures on payments, including in particular cash payments.
- For customers and suppliers in certain high-risk areas of the world, more detailed background checks must be carried out.
- Our sales contracts must require our suppliers, customers and agents to comply with applicable rules on money laundering and terrorist financing.

What to look out for

- Unusual payment structures, including:
 - Customers who want to make payments in cash.
 - Requests from suppliers that payments are made to third parties.
 - Transactions involving high-risk countries, offshore banks or unlicensed intermediaries.
- Suppliers, customers or third parties who do not appear to be involved in legitimate business activity.



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I've won a contract with a new customer in the Middle East. I've just been asked to issue invoices to a separate company in Liechtenstein.

Q. Any reason for me to question this?

A. Yes. There may be nothing wrong with this payment structure, but it looks unusual so we need to look into it further. Raise it with your line manager and ensure the Finance Director in the business where you work is aware of the position.

17. SANCTIONS AND TRADE CONTROLS

Why is this important?

Governments across the world, particularly in the US and the EU sometimes prohibit businesses from dealing with specific people, organisations or governments because they are involved in terrorism or other criminal activities.

In addition, some of the products we sell may only be sold to customers who hold certain permits or approvals or who are above a certain age. Examples include aviation fuels, tobacco products and some healthcare products. These are known as controlled products.

What's required?

- Follow all internal policies and procedures to ensure that the people and businesses we deal with are not subject to trade controls.
- In particular, ensure that suitable background checks are done on suppliers, agents or other intermediaries, and customers who are based in high-risk countries or who want to buy controlled products, before we agree to do business with them.
- Our sales contracts must require our customers to comply with applicable trade controls.

What to look out for

- Transactions involving high-risk countries or people from high-risk countries.
- The appointment of suppliers, agents or customers based in or doing work for us in high-risk countries before suitable background checks have been done and controls put in place.
- Customers re-selling products they buy from us into high-risk countries.
- Export arrangements that appear unusual.
- Transactions involving controlled products where suitable checks have not been done.



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I've just been approached by a customer based in North Africa. They want to place a large order and want delivery soon. We've done business with them before, but I am not sure if we did a background check at that time.

Q. Can I just trust that everything is ok?

A. You should ensure that suitable checks are done in any event as new sanctions may have come into effect. Contact the Finance Director in your business to ensure that these checks are done before we start doing business with them.

18. PROTECTING OUR ENVIRONMENT

Why is this important?

We are committed to undertaking our activities in a way that balances the needs of our customers for the products and services we sell with the wider need to manage the finite resources of the planet.

So, compliance with the environmental laws and regulatory requirements that affect our operations is a minimum requirement. For example, we may be required to have licences for certain types of manufacturing or transport activities or to deal with waste in a specified manner. Where this is the case, we will have internal policies and procedures to ensure we are compliant.

What's required?

- Follow all the applicable legal and regulatory standards (including for example the conditions of any licences) and all internal policies and procedures relating to emissions, the storage, transport or disposal of waste.

What to look out for

- Activities that you think are likely to result in uncontrolled emissions or damage to the environment.
- Opportunities to conserve energy, water and other resources and to reduce waste.



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I need to make an oil delivery but I'm not happy with the set-up and am worried about a spillage. I'm sure everything will be ok.

Q. Should I go ahead?

A. No. We should not take chances in circumstances like this. Ensure that the likelihood of a spill is minimised before proceeding. If in doubt, do not make the delivery.



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