

Supply Chain Integrity Code of Practice





CODE OF
PRACTICE

INTRODUCTION

At DCC Vital, we work with our long-term strategic business partners to develop mutually beneficial relationships. We will work closely with you to ensure that the products and services supplied meet the high quality and integrity standards that we and our customers expect. Taking this approach protects our customers, your business and reputation as much as our own. We are committed to this approach in every area of our activities and to continually develop and improve our practices.

To help us to achieve this, we have developed this Code of Practice setting out the key ethical and legal standards that apply to the business we do together. Please ensure that you take suitable steps to meet the standards set out in this Code, including bringing it to the attention of the members of your team that we deal with. Following the standards in this Code will allow us to develop a business relationship based on trust and which is sustainable in the long-term.

Any person who is dealing with us, at any level of seniority, should feel free to raise concerns about whether these standards are being met by DCC Vital. They can contact a member of the DCC Vital Senior Management Team directly. Contact details can be found on www.dccvital.com. Alternatively, you can contact a member of the Ethical team at ethical@dccvital.com. We will 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.

Harry Keenan

Group Managing Director

Area	Expected Standards
Health & Safety	<p>PRINCIPLE:</p> <p>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.</p> <p>WHAT THIS MEANS:</p> <p>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 partners 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.</p> <p>Partners working at a DCC Vital 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.</p> <p>Partners should provide their employees, including new or reassigned workers, regular and recorded health and safety training. Any emergencies that may impact DCC Vital 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.</p>
Employment & Human Rights	<p>PRINCIPLE:</p> <p>DCC Vital 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 partners to do the same.</p> <p>WHAT THIS MEANS:</p> <p>Specifically, you should ensure that your employees and other workers are:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

Area	Expected Standards
Environmental Protection	<p>PRINCIPLE:</p> <p>We expect you to comply with all laws and regulations that support the protection of the environment.</p> <p>WHAT THIS MEANS:</p> <p>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 Vital, including regarding spillages or releases of products that have an impact on the environment or on third parties.</p>
Bribery & Corruption	<p>PRINCIPLE:</p> <p>You will not be involved in bribery or any other form of corrupt activity.</p> <p>WHAT THIS MEANS:</p> <p>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.</p> <p>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 Vital must be modest and not designed to improperly influence the outcome of any decision.</p>
Confidential Information	<p>PRINCIPLE:</p> <p>You will not share confidential information inappropriately or use confidential information that should not be in your possession.</p> <p>WHAT THIS MEANS:</p> <p>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 Vital with any third party, you must again immediately let us know.</p>
Data Protection & Privacy	<p>PRINCIPLE:</p> <p>You will collect and use personal information carefully and in compliance with relevant data protection and privacy laws.</p> <p>WHAT THIS MEANS:</p> <p>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.</p>

Area	Expected Standards
Competition (Anti-Trust) Laws	<p>PRINCIPLE: You will take all steps reasonably necessary to ensure that you are fully compliant with applicable competition (also known as anti-trust) laws.</p> <p>WHAT THIS MEANS: As stated on the previous page, 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.</p> <p>You will ensure that you provide suitable training on relevant competition laws to relevant employees within your business.</p>
Tax Compliance	<p>PRINCIPLE: You will not engage in or facilitate any deliberate underpayment of taxes that are due.</p> <p>WHAT THIS MEANS: You will correctly declare all income and be transparent with tax authorities about your transactions.</p> <p>You will take reasonable steps to prevent your employees, contractors or representatives from facilitating tax evasion by third parties.</p> <p>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 Vital, or where you suspect that another party in our supply chain may have engaged in tax evasion.</p>
Intellectual Property	<p>PRINCIPLE: You will not sell products or provide services that deliberately or clearly infringe the intellectual property rights of any third party.</p> <p>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.</p>
Product and Service Safety & Quality	<p>PRINCIPLE: We respect the rights of the consumers of the products and services we sell. Every product and service you sell us must be safe, comply with relevant standards and be accompanied by legally-required product and service information.</p> <p>WHAT THIS MEANS: You must ensure that any product and service you sell us is safe for the purpose for which it is intended and complies with all relevant standards for that product or service. You will provide or make available to us relevant product or service safety documentation, as may be required by law.</p> <p>You must also notify us immediately where you have any concerns that a product or service may be unsafe or not compliant with standards relevant to it. Where relevant, you will work to satisfactorily address customer concerns about the products and services you sell us.</p>

Area	Expected Standards
Export Controls & Sanctions	<p>PRINCIPLE:</p> <p>You will strictly comply and without exception conduct your business in accordance with all applicable export controls, sanctions and embargoes laws and regulations.</p> <p>WHAT THIS MEANS:</p> <p>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.</p> <p>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.</p> <p>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.</p>
Managing Compliance	<p>PRINCIPLE:</p> <p>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.</p> <p>WHAT THIS MEANS:</p> <p>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.</p> <p>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.</p> <p>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 partners, representatives and other third parties involved in your business.</p> <p>We will take suitable steps where a partner 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.</p>

HOW TO RAISE A CONCERN

You can contact a member of the DCC Vital Senior Management Team (www.dccvital.com) or please contact the DCC Group Legal & Compliance team on doing-the-right-thing@dcc.ie. Alternatively, you can contact a member of the Ethical team at ethical@dccvital.com. 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.

Please refer to POL-DCCV-00001 for the list of DCC Vital companies to which this code applies.





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