

## Flogas Northern Ireland

### Modern Slavery Act 2015

#### Slavery and Human Trafficking Statement for the Year Ended 31 March 2019

##### 1. Our Policy

Flogas Northern Ireland is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

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

##### 2. Our Business

Flogas Northern Ireland is a distributor of liquid petroleum gas (LPG) and a supplier of natural gas in the energy sector. Seasonal work is a feature of the industry in which we operate. The LPG business is part of DCC Energy Limited with a sister business which is an oil distributor. We operate a marine terminal in Belfast through which import LPG, which we then distribute to our customers in bulk and cylinder form. More information on our business is available at [www.flogasni.com](http://www.flogasni.com).

We are a part of the DCC Group. DCC is a leading international sales, marketing and support services group with a clear focus on performance and growth. Its headquarters are in Dublin, Ireland. It is listed on the London Stock Exchange and is a constituent of the FTSE 100 Index.

DCC currently has operations in 17 countries and employs over 12,000 people. Additional information on the Group is available at [www.dcc.ie](http://www.dcc.ie).

##### 3. Our Structure

Our business operates in Northern Ireland with sister operations in the Republic of Ireland. In the Republic of Ireland we also supply LPG, natural gas and electricity. These businesses also trade under the Flogas name. We have a sister company called Clearpower which supplies biomass and provides energy services.

#### 4. Our Supply Chains

The large majority of the products we use are sourced from reputable suppliers who are based in the UK and in other parts of the European Union. We also source a limited number of products such as LPG appliances and cylinders from countries outside the EU (Mexico and Thailand).

The following table contains a summary of the activities that we consider present the highest risk of slavery and human trafficking in the industries in which we operate, with, in each case, a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

Industry Risk	Steps Taken
Flogas Northern Ireland engage brokers, agents and contractors to provide some services to customers, including meter reading, sales management, customer service and maintenance/removal of LPG tanks.	The business recognises the risk that certain contractors might engage and exploit casual workers and has controls in place to ensure that it only appoints reputable contractors who comply with applicable employment standards.
Flogas Northern Ireland purchases certain products from businesses in Mexico and Thailand.	The business recognises the risk of working with suppliers whose supply chain extends into areas outside the EU, and has taken additional due diligence steps to ensure that those third party supply chains comply with applicable employment standards.

#### 5. Our Policies on Slavery and Human Trafficking

The *DCC Code of Conduct* sets out our Group's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, section 2 of the Code sets out our commitment to fair employment practices and section 14 of the Code sets out our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

In addition, the *DCC Group Supply Chain Integrity Policy* sets out the approach taken by every business in the DCC Group to ensuring that all the products we sell meet applicable legal and ethical standards.

Both of these documents are available at <http://www.dcc.ie/responsibility/our-policies>.

Our policy on slavery and human trafficking is set out in section 1 of this statement.

The requirements of our *Code of Conduct*, *Group Supply Chain Integrity Policy* and our own policy are reflected in the more detailed policies and procedures that we have in place in Flogas Northern Ireland. These are addressed in more detail in section 6 of this statement.

## **6. Procedures on Slavery and Human Trafficking**

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

- Assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our suppliers have in place and carrying out other suitable checks;
- Monitor potential risk areas in our supply chains on a periodic basis.

## **7. Assurance and Key Performance Indicators**

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the directors of Flogas Northern Ireland.

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

## **8. Training and Awareness**

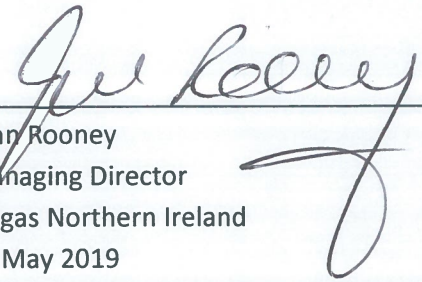
We provide training to relevant employees on supply chain risks, including the risk of slavery and human trafficking at suitable intervals. Our participation in industry associations and our dealings with suppliers also provide information on where slavery and human trafficking risks may arise in the industries where we are active and best practice in avoiding them.

## **9. 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 ended 31 March 2019.

This statement has been approved by the boards of directors of Flogas Northern Ireland.





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John Rooney  
Managing Director  
Flogas Northern Ireland  
24 May 2019