



## Modern Slavery Act 2015

### Slavery and Human Trafficking Statement for Year Ending 31 March 2019

#### 1. Our Policy

DCC Vital 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 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

We distribute a broad range of own- and third party-branded pharmaceuticals and medical devices to hospitals, pharmacies, GPs, other healthcare providers and related industries in Britain and Ireland. Seasonal work is not a feature of the industry in which we operate. More information on our business is available at [www.dccvital.com](http://www.dccvital.com).

We are 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 is organised into the following trading companies:

- Fannin Limited
- Fannin (UK) Limited
- Fannin (NI) Limited
- Kent Pharmaceuticals Limited
- Medisource Ireland Limited
- Squadron Medical Limited
- The TPS Healthcare Group Limited
- Williams Medical Limited

#### 4. Our Supply Chains

Our primary supply chain partners are authorised pharmaceutical and medical device manufacturers and distributors. The large majority of these are located in countries where the risk of modern slavery and human trafficking is low. Where we deal with suppliers in countries where this risk is higher, we have put more robust controls and due diligence in place.

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 a summary of the steps we have in place to avoid these affecting our activities or our supply chains.

Industry Risk	Steps Taken include
Representing manufacturers or engaging contract manufacturing in high risk countries	<ul style="list-style-type: none"> <li>– Quality and ethical due diligence checks/reports</li> <li>– Risk based approach to desktop and site auditing including 3<sup>rd</sup> party auditors or compliance schemes</li> <li>– Robust agreements including quality and supply chain integrity clauses</li> <li>– Open regular two-way communications on compliance expectations and performance</li> </ul>
Appointing distributors outside the EU	<ul style="list-style-type: none"> <li>– Provision of training to our partners where required</li> <li>– Agreeing mitigating controls and corrective actions where required</li> <li>– Terminating the relationship if mitigation not possible</li> </ul>

#### 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.

At DCC Vital, we have established our *Supply Chain Integrity Procedure* and *Code of Practice* to reflect the requirements of these Group policies. These documents outline the detailed requirements we follow at DCC Vital and which have been integrated into local company procedures. In addition, relevant DCC Vital companies participate in the NHS Labour Standards Assurance System including 3<sup>rd</sup> party audit of our Supply Chain Integrity Procedures.

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

As part of our compliance with the policies and procedures 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 incl audits;
- Monitor potential risk areas in our supply chains on a periodic basis.

#### **7. Procedures on Slavery**

Responsibility for ensuring that our procedures are adequate and are adhered to in all areas of our activities rests with the senior management team of DCC Vital.

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

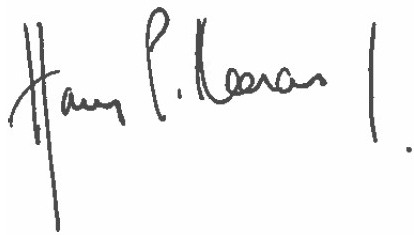
#### **8. Training & Awareness**

To ensure a suitable understanding of the risks of modern slavery and human trafficking in our business and our supply chains, directors and relevant employees in our business have received training in the procedures relevant to their responsibilities. Employees working with supply chain partners in high risk countries have completed additional bespoke training. Supply Chain integrity training forms a part of ongoing training at DCC Vital with further training planning in 2019..

#### **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 ending 31 March 2019.

This statement has been approved by the DCC Vital Leadership Team.



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**Harry Keenan**  
**Group Managing Director**  
**DCC Vital**  
**June 2019**