



## **Modern Slavery Act 2015**

### **Statement for Year Ending 31 March 2016**

#### **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 suitable procedures in place to identify and prevent these practices.

#### **Our Business**

We sell, market and distribute a broad range of own- and third party-branded pharmaceuticals and medical devices to hospitals, pharmacies, GPs and other healthcare providers in Britain and Ireland.

DCC Vital is 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.

#### **Our Structure**

Our business is organised into the following trading companies:

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

#### **Our Supply Chains**

The primary sources of the products we purchase are authorised pharmaceutical and medical device manufacturers and distributors. The large majority of these are located 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 will put more robust controls in place.

#### **Our Policies on Slavery and Human Trafficking**

The DCC Group *Business Conduct Guidelines* which are available at [www.dcc.ie](http://www.dcc.ie) set out our commitment to acting ethically and with integrity in all our business relationships. In addition, the DCC Group *Supply Chain Integrity Policy* which is available at [www.dcc.ie](http://www.dcc.ie) 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. Among other things, this Policy requires us to consider the risk of slavery or human trafficking arising in the countries where our suppliers

are located. Having conducted this risk assessment, the Policy requires us to conduct suitable due diligence and to put in place controls to prevent slavery and human trafficking.

We are committed to reflecting the requirements of our Group *Business Conduct Guidelines* and *Supply Chain Integrity Policy* in more detailed policies and procedures that we maintain in DCC Vital. Our policy on slavery and human trafficking is set out at the commencement of this statement.

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

- to assess potential risk areas in our supply chains, including where suppliers are located in countries where modern forms of slavery or human trafficking are prevalent;
- to mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing the controls that our suppliers have in place and carrying out other suitable checks;
- to monitor potential risk areas in our supply chains on a periodic basis.

Where we identify instances of modern slavery or human trafficking we will take suitable action to deal with the issues in question. This may include not appointing the supplier. It may also involve notifying relevant authorities of the issues involved.

Where a supplier does not have suitable controls in place to prevent slavery and human trafficking, we will consider whether we can work with them to implement improvements.

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.

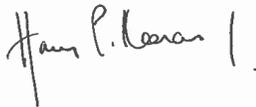
### **Training**

To ensure a suitable of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, directors and relevant employees in our business will participate in workshops with other businesses in the DCC over the course of the 2016/17 financial year.

### **Monitoring**

We will establish key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

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 2016.



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**Harry Keenan**  
**Group Managing Director**  
**DCC Vital**  
**June 2016**