

BRENNTAG UK LTD ANTI-BRIBERY AND CORRUPTION POLICY

Brenntag UK Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas and takes a zero-tolerance approach to bribery and corruption of any kind. Brenntag are committed to implementing and enforcing effective systems to counter bribery and corruption and this policy sets out Brenntag's position in relation to the prevention of bribery and corruption in accordance with the Bribery Act 2010 ('the Act').

The Act came into force on 1 July 2011. The four main offences under the Act are::

- 1) giving, promising or offering a bribe;
- 2) receiving, requesting or accepting a bribe;
- 3) bribing a foreign public official; and
- 4) failure of a commercial organisation to prevent bribery by an associated person.

The Act can be viewed using the following link:

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>

Policy Objective

The Brenntag Anti-Bribery and Corruption Policy ('the Policy') sets out Brenntag's responsibilities, and those of any person working for it, in relation to compliance with the key Anti-Bribery and Corruption principles set out in the Act and provides information and guidance to those working for Brenntag on how to deal with bribery and corruption issues.

Policy Scope

All Brenntag employees, directors, officers, agents, volunteers, interns, external consultants, contractors, business partners, sponsors and suppliers or any other person associated with Brenntag, anywhere in the world, must comply with the Policy. The Policy extends to all of Brenntag's Group Companies carrying out any part of their business in the UK or in any countries in which Brenntag or its subsidiaries and associates operate.

The Policy underlines Brenntag's commitment to having adequate procedures in place to ensure that all its associated persons (including, for the avoidance of doubt, contractors and suppliers) comply with the Act..

Where Brenntag have a minority interest it shall encourage the application of the Policy amongst its business partners including joint venture partners. It is essential that Brenntag conduct an effective process of due diligence prior to entering into significant business relationships and that a record is kept of this process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual and criminal matter, and may result in action up to and including dismissal for the individual concerned. Any breach may cause serious damage to the reputation and standing of Brenntag and any report of a breach or suspected breach of the Policy will be fully investigated and documented.

Brenntag does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in its business dealings, anywhere in the world, whether in the public or private sector. Ethical behaviour is in the long term interests of Brenntag and everyone associated with it.

Key Principles

Brenntag is committed to promoting and upholding the following key Anti-Bribery and Corruption principles:

- 1) Brenntag will carry out business fairly, honestly and openly;
- 2) Brenntag will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business or public role, or to a third party associated with that person, to get them to do something improper;
- 3) Brenntag will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing them to our business advantage.
- 4) Brenntag will not use intermediaries or contractors for the purpose of committing acts of bribery.

Brenntag do not allow employees or associated persons to accept money, gifts, hospitality and other advantages from business associates, actual or potential suppliers, or service providers which are intended to influence a business decision or transaction in some improper way.

Any employee found to be in breach of these principles will face disciplinary action.

No employee will suffer demotion, penalty, or other adverse consequence for refusing to pay bribes, even if it may result in Brenntag losing business.

Brenntag will avoid doing business with others who do not commit to adhering to the Policy.

Brenntag are committed to a programme to counter the risk of Brenntag or its associated persons being involved in bribery or corrupt practices. Brenntag will have adequate procedures in place to ensure that all employees and associated persons understand the implications of the Act, the Policy and all other relevant rules and procedures.

Implementation, Monitoring and Compliance

Brenntag will conduct risk assessments across its businesses on a regular basis and where relevant will identify employees or other associated persons of Brenntag who are in positions where they may be exposed to bribery.

Further information and training on the Act and what it means for Brenntag will be issued in relation to such bribery risk areas identified in the risk assessment. This training will be mandatory for those individuals identified in these risk areas.

General guidance will be cascaded through senior management and line managers and will be made available to all employees and associated persons.

Internal Audit will monitor the adequacy of this Policy and associated processes and procedures on an annual basis.

The Brenntag Anti-Bribery Group will meet to monitor performance of this Policy and will prepare and submit an annual report to the Senior Responsible Officer for the Policy . The Senior Responsible Officer will report on an annual basis to senior Brenntag management and where relevant the Brenntag Board.

Any concerns relation to a breach of the Policy should be reported in one of the following ways:

Your Line Manager

Group Head of Legal (Lisa Crossland)

A Member of the Exec Committee

Director of HR (Cheryl-Anne Salton)

Head of Internal Audit (Richard Ash)

Further information and guidance

This policy sets out the key principles which Brenntag must adhere to. Further relevant information and guidance about this policy can be found in the **UK Ministry of Justice** website:

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>