

Declaration of Conformity in accordance with Article 9 para. 1 lit. c) ii) SE-VO in conjunction with section 161 of the German Stock Corporation Act (Aktiengesetz)

The Board of Management and the Supervisory Board of Brenntag SE are obliged to resolve a Declaration of Conformity in accordance with Article 9 para. 1 lit. c) ii) SE-VO in conjunction with Section 161 of the German Stock Corporate Act (Aktiengesetz). The last Declaration of Conformity was resolved on December 13, 2022 and updated on April 18, 2023.

The Board of Management and the Supervisory Board hereby declare that Brenntag has complied with the recommendations of the German Corporate Governance Code in the version dated April 28, 2022 (GCGC 2022) since the last update of the declaration of conformity dated April 18, 2023 with the exception of the recommendations in sections G.7 and G.8 GCGC 2022. The exception is explained for the following reasons:

According to recommendation G.7 s. 1 GCGC 2022, referring to the forthcoming financial year, the Supervisory Board shall establish the performance criteria for all variable remuneration components for each Management Board member, which - in addition to operational targets - shall primarily be based on strategic goals. Furthermore, pursuant to recommendation G.8 GCGC 2022, subsequent changes to the target values or the comparison parameters shall be excluded.

By resolution dated April 18, 2023, the Supervisory Board approved a revised remuneration system for the Board of Management, which was approved by the Annual General Meeting on June 15, 2023 and came into force with effect from January 1, 2023. To apply the revised remuneration system as widely as possible, the Supervisory Board had the option of agreeing with the members of the Board of Management to adjust their service contracts to the new remuneration system, possibly with retroactive effect from January 1, 2023.

If the service contracts of the Board of Management members are amended with retroactively effect to the requirements of the new remuneration system, new

performance criteria must be determined accordingly. As the revised remuneration system only came into force (retroactively) when it was approved by the Annual General Meeting on June 15, 2023, the new performance criteria could not be set at a point in time compliant with the recommendation of G.7 GCGC 2022. To the extent G.7 GCGC 2022 should be applicable in such a case, a precautionary deviation from recommendation G.7 GCGC 2022 is declared. The overall composition and structure of the variable remuneration has changed as a result of the revised remuneration system. An adjustment of the remuneration of the current members of the Board of Management to the revised remuneration system during the year therefore automatically led to changes in the targets and comparison parameters and thus to a deviation from recommendation G.8 GCGC 2022.

Furthermore, the Board of Management and the Supervisory Board declare that Brenntag complies with all recommendations of GCGC 2022 and will continue to do so in the future.

Essen, December 14, 2023

Board of Management

Dr. Christian Kohlpaintner / Dr. Kristin Neumann

Supervisory Board

Richard Ridinger