

# Human rights and decent working conditions

## **Report 2022**

This report accounts for Brenntag Nordic Norway`s due diligence assessments pursuant to the Norwegian Transparency Act.

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## About our company

We are the global market leader in chemicals and ingredients distribution. Our company holds a central role in connecting customers and suppliers of the chemical industry.

With our two global divisions Brenntag Essentials and Brenntag Specialties we provide a full-line portfolio of industrial and specialty chemicals and ingredients as well as tailor-made application, marketing and supply chain solutions, technical and formulation support, comprehensive regulatory know-how and digital solutions for a wide range of industries.

We operate a global network of about 600 locations in 72 countries. With our global workforce of more than 17,500 employees we generated sales of EUR 19,4 billion in 2022.

## Human rights and decent working conditions

As the global market leader in chemical and ingredients distribution, we take our responsibility to uphold human rights seriously. Our company undertake to respect and defend human rights worldwide within our supply chains and own operation. These are among our top principles.

We are a member of the UN Global Compact and committed to its ten principles for human rights, labor standards, fair remuneration, environmental protection and fighting corruption. Worldwide, we work to ensure fair working relationships and as described in the ESG strategy, acts as a responsible partner to suppliers.

Since 2016, we have been a member of the industry's Together for Sustainability (TfS) initiative. One core element of the joint work within TfS involves audits or online assessments of suppliers. The task here is always to create and leverage synergies.

We work together with EcoVadis, a leading provider of sustainability assessments that is well established in the industry. EcoVadis evaluates companies in terms of four categories: environment, labor and human rights, ethics, and sustainable procurement. In doing so, it scores the companies sustainability performance on a scale from 0 to 100.

In addition, each company receives a detailed overview of strengths and weaknesses as well as specific suggestions for improvement.

Our company also undergoes an EcoVadis assessment on a regular basis. In the most

recent assessment published in December 2022, we improved on our previous score and achieved 77 points, the highest result in the company's history. We were awarded the EcoVadis platinum medal for this result and thus ranks among the top 1% of all companies rated by EcoVadis. On sustainable procurement, we score a particularly high 90 out of a possible total of 100 points and is rated as outstanding.

We minimize the risk of human rights violations in its complex supply chains by communicating our expectations to suppliers from the outset. In its Supplier Code of Conduct, we request that suppliers actively work to protect human rights within their organization.

We face a daily challenge of compliance, checking the various restricted parties' lists imposed by countries or governmental institutions. A screening system, provided by Amber Road, is beneficial in such a way that it allows us to maintain an audit trail of any sanctioned business partner to reduce risks and to demonstrate reasonable care. The screening of business partners against hundreds of government-issued lists that are constantly updated with restricted parties, embargoed countries and debarred individuals aims to prevent us from illegal transactions and potential fines and penalties. By using the restricted party screening solution, we are able to show that we have actively implemented adequate procedures and processes to ensure compliance with international trade regulations (i.e. sanctions and embargoes).

## Human rights policy

Our Human right policy is based on our Code of Conduct. We are a signatory of the United Nations Global Compact initiative and has committed to incorporating its principles into our corporate culture. We respect and support the protection of internationally proclaimed human rights. We do not tolerate any behavior which violates human rights and will not be complicit in human rights abuses. This is also applicable to our supply chain which is regularly checked through supplier assessments and audits.

## Whistleblowing channel

We have set up procedures for receiving and handling internal and external complaints and reports of compliance issues throughout the Group. Our employees can either make such reports to their direct supervisor or the regional compliance manager, or alternatively submit them via central or regional whistleblowing channels and whistleblowing systems.

It is also possible to make an anonymous report using the whistleblowing system. Persons outside the company can submit complaints and report infringements by using the whistleblowing channel on the web-

site of Brenntag SE. The information received is always treated in strict confidence. Any reports received are reviewed internally and at the meetings of the Audit Committee. Appropriate action is taken if a compliance infringement has occurred.

## Responsibilities (overall organization)

In 2022, in preparation for the specific requirements of the Norwegian Transparency Act and the German Supply Chain Due Diligence Act (LkSG), we started to further develop our risk assessment regarding human rights violations, decent working conditions and environmental risks for all suppliers, own operation and other business partners.

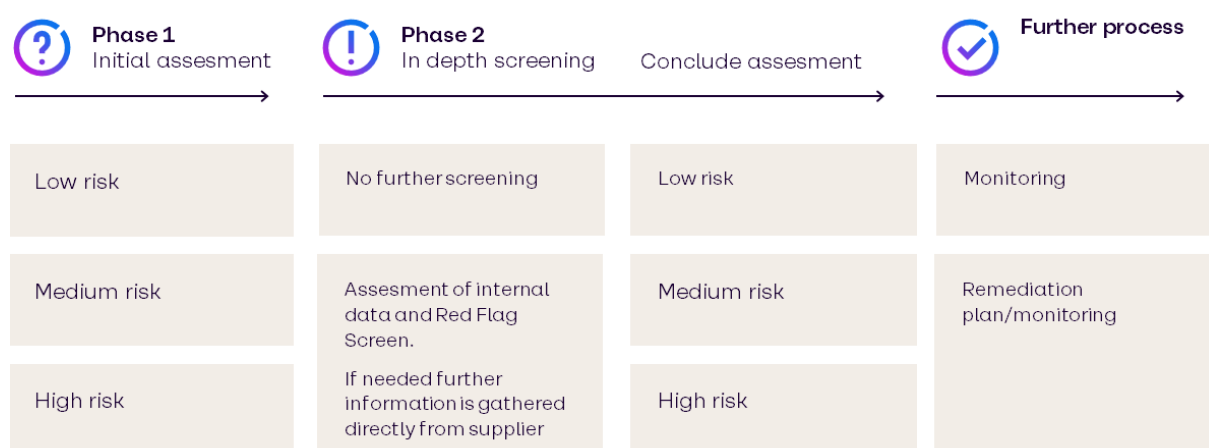
We set up a Global and Nordic interdisciplinary project team of experts from the fields of QSHE, sustainability, compliance, legal, human resources, and procurement, which deals explicitly with implementing the requirements.

The Nordic group reports to Managing director Brenntag Nordic AS and Board of Norway, in relation to the Norwegian Transparency Act.

## Due diligence assessment

In accordance with the Act, we perform due diligence assessment in line with the OECD guidelines for Multinational Enterprises. This is a risk-based and continuous process.

Our risk analysis and risk management process aim to identify human rights and environmental risks in line with the Norwegian Transparency Act. Below you will find a simplified illustration of the process, which can be divided into two phases.



### Phase 1: Risk Assessment and Preventive Measures

Our internal supplier data is run through a risk assessment to determine whether a supplier is low, medium, or high risk. Basis for the risk assessment are Country risk, EcoVadis score, industry and spend.

Low risk suppliers will not go through any additional screenings. Medium and high-risk suppliers will undergo additional screenings in Phase 2.

Preventive measures will always be taken for all suppliers, regardless of their risk level, to

further minimize the overall risk within our supply chain.

### Phase 2: Red Flag Screen, Remedial Measures and Monitoring

Medium and high-risk suppliers undergo a second more in-depth media and internet screening called a Red Flag Screen. This screening may identify current or historical violations related to the supplier.

Basis for screening in phase 2 are information from our own Supplier Evaluation regarding Social Accountability filled out by supplier,

Supplier Code of Conduct and SEDEX memberships.

In cases with lack of documentation, statement, identified violations, remedial measures in the form of a Remedial Action Plan will be put in place to minimize or end the violation identified.

The target is not to terminate business relationships, but to review each risk and identified violation in terms of how to improve the situation.

If no violation has been identified or whenever the remedial action plan is successfully concluded, the supplier will continuously be monitored, along with all other suppliers.

## Overall summary

In 2022, we focused on suppliers with medium and high risk. The result from our risk assessment: **1 % high risk, 6% medium risk, 93% low risk.**

In the reporting period for 2022, we have identified no breaches of human rights and decent working conditions within our supply chain, own operations, or our business partners.

We did not receive any reports of human rights violations within the company through our whistleblowing system in the reporting period for 2022.


We continuously develop measures to further reduce potential risks within global supply chains and own operations. Going forward, we will continue to constantly expand our commitment to respecting human rights across worldwide supply chains. We aim to have all suppliers and sub-suppliers covered by risk management.

Additionally, we will continue to train our suppliers having a greater focus on sustainability issues, to which end we will make greater use of the TFS Academy or e-learning resources, as an example.

In addition to existing EcoVadis assessments and TFS audits, there will be an innovative IT solution that works both with publicly accessible information (via media) and with artificial intelligence.

## Approval and signature by the Board of Directors

Grålum, June 14, 2023

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Russel Argo (Jun 28, 2023 08:16 GMT+1)  
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Board member



## Communication and information

The report presents the status as of 31 December 2022 and is in line with the requirements in the Norwegian Transparency Act.

The report is published on our Norwegian webpage and will be updated prior to the act. The public can request information related to the Norwegian Transparency Act through email address: [norway.transparencyact@brenntag.com](mailto:norway.transparencyact@brenntag.com)

### Further information

[Brenntag SE Annual Reports](#)

[Code of Conduct](#)

### Contact

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# Human rights and decent working conditions, Norway 14062023

Final Audit Report

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