

Human rights and decent working conditions

REPORT 2024

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



Company Profile

Brenntag Norway is a subsidiary of Brenntag SE, the global market leader in chemical and ingredients distribution. The company holds a central role in connecting customers and suppliers of the chemical industry. With its two global divisions Brenntag Essentials and Brenntag Specialties the company provides 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. Brenntag operates a global network of about 600 locations in 72 countries and a global workforce of more than 18 000 employees.

Culture and values

Our culture & values define what is important to us, what we stand for, what we value and how we interact with each other at Brenntag.

Care - We take responsibility for each other, our partners and the world.

Trust - We build relationships through authenticity and commitment.

Clarity - We work toward common goals with focus and determination.

Excellence - We go beyond expectations through excellence, innovation and collaboration.

Safety - We put safety first in everything we do.



Code of Business Conduct and Ethics

Brenntag's values **care, trust, clarity, excellence, and safety** are the foundation of all business activities and relationships, driving continuous improvement across the value chain. The Code of Business Conduct and Ethics reflects these values and sets out additional principles of conduct which are expected of all Brenntag employees.

Our [Code of Business Conduct and Ethics](#) outlines the fundamental requirements for Brenntag's overall business activities in areas such as:

- **anti-corruption**
- **anti-money laundering**
- **books, records, and financial reporting**
- **competition and antitrust law**
- **conflicts of interest**
- **confidentiality**
- **data protection and information security**
- **foreign trade compliance**
- **fraud prevention**
- **insider trading**
- **handling and safeguarding of Brenntag property**
- **health, safety, and environmental protection**
- **human rights and labor practices**

Brenntag minimizes the risk of human rights violations in its complex supply chains by communicating its expectations to suppliers from the outset. In our [Supplier Code of Conduct](#), Brenntag requests that they actively work to protect human rights within their organization.

We expect our suppliers as well to comply with

- **all applicable laws and regulations**
- **principles related to good governance business practices**
- **human rights and appropriate working conditions**
- **environmental responsibility**

Human rights policy

The [human rights policy](#) underscores Brenntag`s commitment to protecting and advocating for human rights in our own business area and our supply chain. Moreover, it outlines that our due diligence system fulfills this commitment to identify and mitigate relevant human rights risks that are connected to Brenntag. Brenntag 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.

Human rights and decent working conditions

As the global market leader in chemical and ingredients distribution, Brenntag takes its responsibility to uphold human rights very seriously. The company undertakes to respect and defend human rights worldwide within its supply chains and own operation. These are among Brenntag`s top principles.

Brenntag is a member of the **United Nations Guiding Principles on Business and Human Rights (UNGP)**, as well as conventions and recommendations of the **International Labor Organization (ILO)** on labor and social standards and the **Organization for Economic Cooperation and Development (OECD)** Guidelines for Multinational Enterprises.

Worldwide, the company works to ensure fair working relationships and as described in the ESG strategy, acts as a responsible partner to suppliers.

Since 2016, Brenntag has 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.

Brenntag works 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.

Brenntag has already undergone several EcoVadis assessments. Our assessment can be found in the EcoVadis platform under **Brenntag SE**. All Brenntag legal entities are covered under this assessment.

Brenntag faces 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 Brenntag from illegal transactions and potential fines and penalties. By using the restricted party screening solution Brenntag is able to show that it has actively implemented adequate procedures and processes to ensure compliance with international trade regulations (i.e. sanctions and embargoes).



Compliance, whistleblowing channel

Brenntag has 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 website](#) 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.

Brenntag Compliance intranet site, internal newsletters and other communication measures has been used to familiarize employees with relevant topics and provide extensive materials, guidelines, and manuals. Brenntag also offers regular training through resources such as the Group-wide e-learning platform to keep employees' knowledge of compliance topics up to date. As an example, the online training module on the Code of Business Conduct and Ethics is mandatory for employees once a year. In addition, antitrust law training and anti-corruption training.

Responsibilities (overall organization)

Brenntag has Global and Nordic interdisciplinary project teams 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 Norway and Board of Norway, in relation to the Norwegian Transparency Act.

Due diligence assessment

Brenntag has integrated a human rights risk management, into an innovative IT solution. Risk management is carried out continuously and all suppliers are covered.

This system classifies all the suppliers into one of four **risk categories**:

Critical, High, Medium, Low



This is based on various risk parameters, including site, sector, sales, AI-supported 360-degree media screening and results from EcoVadis and TfS audits.

The human rights risk assessment is initiated by a broad scoping exercise to identify areas of the business, across countries and operations, where risk of adverse effect on human rights and decent work conditions are most likely to be present and most significant.

The human rights risk assessment has focused mainly of the following 14 categories: Child exploitation, child labour, discrimination, human rights violation, labour demonstration, labour dispute, labour rights violation, labour strike, modern slavery, sexual wrongdoing, protest/ demonstration, unethical labour, wage theft and worker suicide.

While the **assessment of working condition** has focused mainly on the following 12 categories: accident, bomb threat, building collapse, disease, employee infection, explosion, fatality, fire, health & safety issues, injury, quarantine, and shooting.

For suppliers which this results in an increased risk profile, detailed supported screening is also carried out for potential incidents on the supplier's side.

Own operation

The regular risk analysis carried out in our own business unit forms the basis for efficient and constantly improving protection of the human rights of our employees. To this end, Brenntag has created various measures and processes in its own corporate values as well as in its code of conduct and procedural instructions to establish and strengthen human rights and environmental principles. These processes include a self-assessment based on specially developed questionnaires and on-site audits.

Through a comprehensive training concept as well as appropriate and targeted communication, we sensitize employees to human rights and environmental obligations and supplement this concept with additional training in specific relevant departments such as purchasing.

Remedial action

If a violation or imminent threat of a violation of a human rights or environmental obligation is identified within the risk analysis or through other sources in our own business appropriate remedial action will be taken immediately to prevent or stop these violations or to minimize the extent of the violation.

Brenntag will offer to train its suppliers, using the TfS Academy or e-learning.

Overall summary for 2024 and further actions

In the reporting period 2024 Brenntag Norway`s supply chain was covered by the third – party IT system. Suppliers were continuously monitored, 360° screened and risk analysis were performed.

Risk assessment result 2024:

-  **0%** critical
-  **2,3%** high risk
-  **6,8%** medium risk
-  **89,8%** low risk

Compared to 2023:

Low-risk suppliers decreased from 90% to 89.8%, remaining relatively stable.

Medium-risk suppliers decreased from 9% to 6.8%, indicating reduced risk.

High-risk suppliers increased from 1% to 2.3%, representing a minor rise.

However, this increase in high-risk suppliers is insignificant in our context, as it does not substantially impact the total amount or volume of annual purchases.

For the suppliers categorized as high-risk, Brenntag has assigned internal responsibilities to ensure that potential human rights risks at the supplier's end are addressed and thus reduced. Additional preventive measures are based on the existing risk management system and include EcoVadis supplier audits, TfS audits and the Supplier Code of Conduct.

In the reporting period for 2024, we have identified no breaches of human rights and decent working conditions within our supply chain, own operations, or our business partners.

Brenntag tries to minimize the risk of human rights violations in its complex supply chains by communicating its expectations to suppliers at the beginning of the business relationship. In its Supplier Code of Conduct, Brenntag requests that they actively work to protect human rights within the organization and their supply chains.

During continuously developing measures to further reduce potential risks, Brenntag will continuously expand its efforts to respect human rights across global procurement and supply chains.

Communication and information

The report presents the status as of 31 December 2024 and is in line with the requirements in the Norwegian Transparency Act.

The report is published at Brenntag Nordic`s website 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

[Group sustainability statement 2024](#)

[Sustainability | Brenntag](#)

[Compliance | Brenntag](#)

Grålum, June 2025

The board of directors of Brenntag Nordic AS

Helge Lundh

Managing Director

Th. Bjørk Pedersen

Chairman of the board

Jan Hoffman

Board member

Kaisu Pohjonen

Board member

Ellen Ingvoldstad

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Jan Hoffmann Sørensen

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On behalf of: Brenntag Nordic AS

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