

MODERN SLAVERY STATEMENT 2025

Brenntag UK is a subsidiary of Brenntag SE, the global leader in chemical distribution.

At Brenntag, we recognise that modern slavery - including servitude, forced labour, human trafficking, and child labour - remains a global challenge. We are committed to eliminating such practices within our business and supply chain. This statement outlines the actions we have taken, and the steps we will continue to take, to uphold this commitment.

Organisation Structure and Reach

Brenntag UK Holding Limited, part of Brenntag SE, the global leader in chemical distribution, operates 50 sites, 5 sea-fed facilities, and a fleet of 140+ vehicles. Since restructuring in 2021, our Essentials and Specialties divisions pursue tailored strategies, supported by our "Strategy to Win" framework, which prioritises growth, digitalisation, sustainability, and responsible merger and acquisition practices.

Brenntag is a recognised Environmental Social and Governance leader and aims to drive responsible chemical distribution and set sustainability benchmarks across the industry.

Our Supply Chain

We source globally to serve the life sciences, environmental, and material sciences sectors. With over 1,000 procurement specialists worldwide, our supplier management processes prioritise ethical, social, and labour standards. Suppliers are expected to meet and improve upon our sustainability benchmarks.

Compliance with the German Supply Chain Act (GSCA)

Our parent company, Brenntag SE, complies with the GSCA (effective January 2023), which mandates risk analysis and transparency across operations and supply chains. The VP of Sustainability acts as our Human Rights Officer, reporting directly to the Group CEO.

Safeguarding Human Rights

As a United Nations Global Compact member, Brenntag promotes fair working practices and responsible partnerships. Key initiatives include:

- A global whistleblowing tool (SpeakUp!), accessible to employees and third parties.
- Protection from retaliation for good-faith whistleblowers.
- Clear remedial protocols for reported or suspected violations, with a focus on engagement and corrective action before withdrawal.
- A Policy Statement on Human Rights and Supplier Code of Conduct, aligned with the United Nations Guiding Principles on Business and Human Rights, International Labour Organisation conventions, and other global standards.

This underpins our zero-tolerance stance on child and forced labour, and outlines expectations around working conditions, freedom of association, health and safety, and anti-corruption.



Auditing, Risk Management & Monitoring

We actively participate in industry initiatives such as Together for Sustainability (TfS) and work with EcoVadis to assess suppliers on environment, labour/human rights, ethics, and procurement.

Additional safeguards include on-site supplier audits and acceptance of third-party standards (SQAS, SMETA, PSCI). The measures are continually monitored and refined by the Human Rights Officer. In the reporting period, Brenntag did not receive any reports of human rights violations within the Company.

Training & Internal Awareness

Brenntag maintains a strong culture of compliance through regular training on ethical business conduct, including modern slavery risks. All new employees receive training at induction, and ongoing awareness is reinforced through mandatory annual e-learning on our <u>Code of Business Conduct and Ethics</u>, antitrust, and anti-corruption policies.

Directors actively oversee the relevance and effectiveness of training content. This is further supported by our EMEA Compliance Roundtable, which promotes the exchange of best practices and practical experiences across regions. A clear and consistent tone from the top reinforces Brenntag's commitment to upholding human rights and compliance with all applicable social and regulatory legislation throughout our operations and supply chain.

Supplier Engagement & Due Diligence

All potential suppliers undergo due diligence before approval, including questionnaires on labour rights, due diligence practices, and audit participation, as well as verification of third-party certifications and human rights policies. Suppliers are asked to confirm adherence to Brenntag's <u>Supplier Code of Conduct</u>.

Brenntag has a zero-tolerance policy toward child, forced, or bonded labour. While no such violations have been identified or reported to date, we are committed to taking immediate and appropriate action - including disengaging from any business relationship - should evidence of such practices arise. Our contracts require suppliers to uphold Brenntag's ethical standards on an ongoing basis. All trading partners are screened via our Global Sanctions Screen, which flags potential compliance risks for escalation before trading can begin.

Brenntag as a Supplier

Brenntag also holds itself to high standards. In 2024, we achieved an EcoVadis score of 81 - the highest in our history - retaining our platinum medal and a place in the top 1% of rated companies globally.

Ongoing Commitment

We will continue to scale supplier training, leverage the TfS Academy, and enhance the use of digital tools to drive ethical practice and human rights protection across our global operations.



We remain committed to refining and expanding our targets and reinforcing our role as a responsible, ethical leader in the chemical industry.

This statement is made pursuant to section 54(i) of the Modern Slavery Act 2015 and constitutes a group Modern Slavery statement for Brenntag UK Holding Limited (Company Number 05777067) and its Subsidiaries Brenntag UK Limited (Company Number: 05262170) and Kluman and Balter Limited (Company Number: 02995518).

SIGNED ON BEHALF OF THE BOARD OF DIRECTORS:

Signed by: EDA49CBA966E47A...

RUSSEL ARGO President Brenntag Essentials EMEA

21/6/2025 SIGNED FOR THE FINANCIAL YEAR 2024 (1 JANUARY 2024 TO 31 DECEMBER 2024) FOR BRENNTAG UK HOLDING LIMITED