

MODERN SLAVERY STATEMENT 2026

Brenntag UK Limited 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 25 sites, 5 sea-fed facilities, and a fleet of 170+ 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 (‘ESG’) leader and aims to drive responsible chemical distribution and set sustainability benchmarks across the industry. Oversight of human rights risks is embedded within Brenntag’s broader ESG governance framework. Responsibility is shared across Group functions including Sustainability, Compliance, Legal, and Procurement, with regular reporting to senior management and Board-level structures to ensure accountability and alignment with corporate strategy.

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.

Human rights due diligence is also integrated into Brenntag’s ESG strategy, ensuring that responsible sourcing considerations are embedded into procurement decision-making processes.

Compliance with the German Supply Chain Act (‘GSCA’)

Brenntag SE complies with the GSCA, which mandates structured risk analysis, preventive measures, and transparent reporting across operations and supply chains. The VP of Sustainability acts as Human Rights Officer, overseeing compliance with these obligations and reporting directly to the Group CCO.

Safeguarding Human Rights

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

- A whistleblowing tool (SpeakUp!). The SpeakUp system is accessible globally to employees, suppliers, and external stakeholders, and is supported by structured investigation, escalation, and remediation procedures to ensure consistent case handling.
- 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. Both documents are publicly available on the Brenntag company website.

The above 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. Brenntag tracks key performance indicators to assess the effectiveness of its human rights programme, including supplier assessment coverage, audit completion rates for higher-risk suppliers, and corrective action follow-up. Insights from supplier audits and assessments are used to strengthen mitigation measures, prioritise higher-risk areas, and support continuous improvement across the supply chain.

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 refresher training delivered via targeted programmes and Workday Learning.

Training covers key areas including the Code of Conduct, antitrust, trade compliance, and anti-corruption, supporting informed and ethical decision-making. This is reinforced through internal communications, including the UK & Ireland Compliance Newsletter, which highlights practical compliance scenarios, promotes key topics, and reminds employees of available guidance and reporting channels.

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 [Supplier Code of Conduct](#) which places expectation upon them to play an active part in protecting human rights within their organisation and throughout their supply chains.

The requirement to maintain and publicise a whistleblowing channel is stipulated in the Supplier Code of Conduct and is therefore passed on within the supply chain.

Brenntag has a zero-tolerance policy toward child, forced, or bonded labour. 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, and scans periodically thereafter.

Brenntag as a Supplier


Brenntag also holds itself to high standards in sustainability performance. The Company currently holds an EcoVadis Gold rating, placing it in the top 3% of all companies assessed worldwide. This external benchmarking supports transparency and continuous improvement across ESG criteria.

Ongoing Commitment

Brenntag is committed to strengthening its human rights due diligence approach by expanding supplier assessment coverage, enhancing risk identification tools, and increasing participation in training initiatives. Work continues on developing measurable ESG-aligned targets, with a focus on broader supplier engagement and enhanced monitoring systems through digitalisation and industry collaboration.

This statement is made pursuant to section 54(j) 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:

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RUSSEL ARGO
President Brenntag Essentials EMEA

SIGNED ^{23 June 2026} FOR THE FINANCIAL YEAR 2025 (1 JANUARY 2025 TO 31 DECEMBER 2025)
FOR BRENNTAG UK HOLDING LIMITED