

MODERN SLAVERY STATEMENT 2024

Slavery and human trafficking continue to be significant issues in our global society. We all have a collective and individual responsibility to be aware of the risks in our business and supply chain. Brenntag UK Holding Limited and its associated companies (“Brenntag”) are committed to preventing all forms of modern slavery, including servitude, forced or compulsory labour, human trafficking, and child labour, within our business and supply chain. This statement outlines the steps we have taken, and will take, to fulfil this commitment and our expectations from our suppliers, contractors, and business partners.

ORGANISATION STRUCTURE AND REACH

Brenntag UK is a subsidiary of Brenntag SE, the global leader in chemical distribution. We simplify market access to thousands of products and services for chemical manufacturers and consumers through our 26 strategic locations, four sea-fed facilities, and a dedicated fleet of over 130 vehicles.

In 2021 Brenntag globally restructured its operating business and established two global divisions: Brenntag Essentials and Brenntag Specialties. These divisions pursue different management approaches but operate under the Brenntag umbrella. Brenntag Essentials focuses on a broad spectrum of sectors and applications, while Brenntag Specialties caters to globally relevant sectors with an extensive range of solutions and high regulatory environments. Brenntag's "Strategy to Win" unveiled in November 2022, outlined growth strategies for both divisions, details and targets for digital transformation, sustainability, and M&A strategy.

Brenntag has outperformed the industry average in various sustainability benchmarks and rankings, with ESG being a key component of its strategy. The company aims to lead in the responsible distribution of sustainable chemicals and ingredients and to influence the sustainability agenda of the industry.

OUR SUPPLY CHAIN

Brenntag utilises logistics and transportation services and collaborates with subcontractors and manufacturers globally. We source goods and services from our worldwide network to deliver products to customers in the life science, environmental, and material science sectors. With purchasing teams of over 1,000 employees globally, including local and regional procurement teams and specialists in sourcing chemical products from Asia, Brenntag has standardised processes for supplier relationship management. Labour and social standards play a significant role in supplier selection and evaluation, and the company actively encourages suppliers to improve their sustainability performance to meet its requirements.

GERMAN SUPPLY CHAIN DUE DILIGENCE ACT ('GSCA')

Brenntag SE, the ultimate parent company of Brenntag UK Holding, implemented the GSCA, which came into effect in Germany on January 1st, 2023. This Act requires companies to ensure transparency in the supply chain and their own area of business, conduct risk analysis, and implement actions to prevent potential breaches of due diligence obligations. As part of this, a human rights officer was appointed for Brenntag SE in 2022, before the Act came into effect. The VP Sustainability Brenntag Group serves as the human rights officer. He oversees the management of human rights and environmental risks and ensures compliance with the legal framework. The human rights officer reports directly to the Brenntag Group's CEO.

SUPPLY CHAIN AND HUMAN RIGHTS

As a leading global distributor of chemicals and ingredients, Brenntag is committed to upholding human rights and is a member of the UN Global Compact, committed to upholding its principles covering human rights, labour standards, fair remuneration, environmental protection, and anti-corruption efforts. Brenntag actively promotes fair working relationships and responsible partnerships with suppliers worldwide. To achieve these objectives, the company has implemented various measures developed by its Sustainability, Legal, and Compliance departments.

A whistle-blowing system is in place for reporting human rights violations. Notably, the company did not receive any reports of human rights violations within the organisation during the reporting period.

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 organisation and their supply chains. In the reporting period, this Supplier Code of Conduct was updated to meet the extended requirements of the GSCA.

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 companies in the chemical industry. Brenntag also works together with EcoVadis, a leading provider of sustainability assessments that is well established in the chemical industry. EcoVadis evaluates companies in terms of four categories: environment, labour 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. In the reporting period, Brenntag continued to see its suppliers making considerable advances in improving their sustainability performance.

Brenntag obtains an even more detailed picture of sustainability performance by performing on-site supplier sustainability audits. In this case, the audits are based on a catalogue of requirements developed by TfS and cover sustainability management, the environment, health and safety, employee and human rights, and corporate governance. The results of all audits are shared within TfS.

Brenntag reviews its suppliers' audit results. If necessary, it agrees on corrective measures with the supplier and the auditor and follows up on their implementation. In the reporting period, Brenntag also initiated further significant steps to augment the existing human rights risk management system in order to prepare itself for the GSCA.

In the field of sustainability, the team was augmented by adding an employee who deals solely with human rights. In the reporting period, the innovative IT solution of a third-party provider was established based on preparations already made for the GSCA, enabling a risk analysis to be produced. This risk analysis serves as a basis for preparing a guideline for preventive measures and is part of our holistic approach to risk management. This includes carrying out extensive risk analysis and prioritization and building on that by initiating preventive measures.

In addition, Brenntag's parent company has prepared and published a Global Policy Statement on Human Rights. In this context, internal training sessions were conducted for Brenntag employees globally from human resources, QSHE, legal, compliance and procurement departments.

COMMUNICATION AND TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular detailed training to relevant members of staff. Brenntag's Directors are committed to the subject and ongoing reviews of the training criteria. All new employees receive training on the topic upon joining.

As a global company, Brenntag is subject to a large number of local, national and international laws and regulations. It is the responsibility of all employees to comply with these rules without exception. Examples of such internal regulations developed by Brenntag include the Code of Business Conduct and Ethics, the Anti-corruption Guideline and other Group guidelines based on the corporate values.

Brenntag also offers regular training through resources such as the Group-wide e-learning platform in order 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 all Brenntag employees globally once a year. This was completed by 96% of the relevant employees in the reporting period (2022: 94%). In addition, based on their roles, employees took part in antitrust law training (completed by 96% of the relevant employees; 2022: 92%) and anti-corruption training (completed by 97% of the relevant employees; 2022: 91%).

EFFECTIVE RISK ASSESSMENT AND DUE DILIGENCE

Brenntag requires its suppliers to provide information and supporting evidence on their policies and actions through sector specific questionnaires before they can become approved partners. These questionnaires cover human rights, due diligence and certification schemes used by suppliers to verify that fair labour practices are used. Suppliers are also expected to disclose information on their sustainable procurement selection criteria, third party audits and supplier capacity building. This provides buyers with visibility of suppliers' efforts to prevent slavery and human trafficking. If Brenntag have any concerns about information provided by suppliers, a desktop audit is carried out to ensure that Brenntag's high standards are being met. Our Anti-Slavery and Human Trafficking Policy prohibits the use of child or forced labour anywhere within our business. It also forbids Brenntag having any involvement with entities that support prohibited labour practices or human trafficking, including slavery, bonded labour, or debt-bondage, or securing labour or services by force, threat, or deception. Our standard form agreements further strengthen this commitment by requiring that suppliers and subcontractors continue to observe Brenntag's policies on an on-going basis.

In addition, all trading partners are automatically and continually vetted against hundreds of restricted and sanctioned party lists sources from government institutions worldwide via Brenntag's Global Sanctions Screen. Suspected matches are thoroughly investigated and escalated as appropriate before trading is allowed to commence.

BRENNTAG AS A SUPPLIER

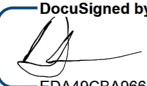
Brenntag itself also undergoes an EcoVadis assessment on a regular basis. In the most recent assessment published in 2024, the company improved on its previous score and achieved 81 points (previous assessment: 77 points), the highest result in the company's history since assessments began in 2014. Brenntag was awarded the EcoVadis platinum medal in 2022 and has since ranked among the top 1% of all companies rated by EcoVadis.

OUR COMMITMENT

Brenntag will continue working to train its suppliers more on sustainability issues, to which end it will make greater use of the TFS Academy and/or e-learning resources. In the course of developing measures to further reduce potential risks, Brenntag will continuously expand its efforts to respect human rights across global procurement and supply chains.

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 AND EXECUTIVE COMMITTEE:

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RUSSEL ARGO
BES PRESIDENT REGION NORTH

20/6/2024
SIGNED FOR THE FINANCIAL YEAR 2023 (1 JANUARY 2023 TO 31 DECEMBER 2023)
FOR BRENNTAG UK HOLDING LIMITED