

MODERN SLAVERY STATEMENT 2023

Slavery and human trafficking remain a hidden blight on our global society. We all have a collective and individual responsibility to be alert to the risks in our business and in the wider supply chain, however small. Brenntag UK Holding Limited and its associated companies (“Brenntag”) are committed to improving our practices to prevent all forms of modern slavery (including servitude, forced or compulsory labour, human trafficking, and child labour), taking place in any part of our business or supply chain. This statement sets out the steps we have taken up to this point, as well as during our past financial year, to implement this commitment and our expectations from suppliers, contractors, and business partners.

ORGANISATION STRUCTURE AND REACH

Brenntag UK is a subsidiary of Brenntag SE, the global market leader in chemical distribution. We manage complex supply chains for both chemical manufacturers and consumers by simplifying market access to thousands of products and services. Our teams are a cornerstone of our success: 26 strategic locations, four sea-fed facilities, a dedicated fleet of over 130 vehicles, with teams serving over 20,000 customer accounts nationwide.

In 2021, Brenntag globally made fundamental changes to its operating business structure and implemented two global divisions. Brenntag Essentials and Brenntag Specialties each pursue a different management approach but operate under the joint Brenntag umbrella. Brenntag Essentials markets a comprehensive portfolio of process chemicals for a broad spectrum of sectors and applications. Brenntag Specialties focuses on ingredients and value-added services for globally relevant sectors with great potential for an extensive range of solutions and high regulatory environments. Brenntag presented the next step in its transformation called “Strategy to Win” in November 2022, on its path to creating two undisputed global leaders within the chemicals industry.

STRATEGY AND MANAGEMENT

With its “Strategy to Win”, Brenntag Group also renewed its commitment to promoting a sustainable future, in order to achieve its long-term ‘*Future Sustainable Brenntag*’ vision. Brenntag Group set itself an ambitious ESG agenda that includes achieving net-zero emissions by 2045, increasing the extent to which we use sustainability criteria to steer our product portfolio, and driving sustainability in our supply chains. A framework was established with medium-term goals in six focus areas, one of which is ‘*Responsible partner for suppliers and communities*’. We want to be considered a responsible partner among our suppliers and the communities where we operate, and to ensure that human rights are seamlessly upheld in our supply chain and living wages are paid. In 2022 we made good progress towards our ESG efforts. This is demonstrated by our platinum status in the renowned sustainability rating EcoVadis, putting Brenntag in the top 1% of companies rated across all industries. We have met our target for 2022 in conducting initial risk assessment for 100% of relevant suppliers.

As a matter of particular priority for 2023, Brenntag has announced its intention to focus upon the issue of human rights. Brenntag undertakes to respect and defend human rights worldwide within its supply chains. Worldwide, our company works to ensure fair working relationships and as described in our ESG strategy, acts as a responsible partner to suppliers.

In 2022, Brenntag Group's Culture Development Initiative brought together inspiration and opinion from nearly 700 Brenntag employees from all regions, functions, and roles in over 90 workshops. Five culture pillars and values were defined as a result, among them 'Care' and commitment to take responsibility for each other, our partners, and the world. Care for human needs lies at the heart of Brenntag's purpose and culture.

OUR SUPPLY CHAIN

Brenntag is a full-line chemical distributor of both industrial and specialty chemicals. We use logistics and transportation services and benefit from specialist support from subcontractors and manufacturers all over the globe. We acquire goods and services from our worldwide network to support delivery of products to customers within the life science, environmental and material science sectors.

Brenntag's purchasing units have over 1,000 employees globally, including local and regional procurement teams, specialists in sourcing chemical products from Asia, and product managers for specific chemicals and customer industries. At various levels throughout the Brenntag Group, there are standardised processes in place for relationship management with suppliers. In selecting new suppliers and evaluating existing supplier relationships, labour and social standards play a decisive and increasingly key role for Brenntag. We actively encourage our suppliers to improve their sustainability performance in order to meet our high requirements.

GLOBAL SOURCING ORGANISATION ("GSO")

Brenntag GSO is the centre of excellence for sourcing industrial and specialty chemicals and ingredients from emerging markets to Brenntag's customers all over the world. GSO provides access to selected suppliers with quality products and value-added services who share in Brenntag's commitment to quality, reliability, innovation, sustainability, and customer satisfaction. The Brenntag GSO team holds offices in Beijing, Shanghai, Taipei, Mumbai, Singapore, and Seoul and is formed of 50 experienced and highly skilled specialists for the different industries who closely cooperate with Brenntag regions worldwide. Brenntag GSO audits all producers according to a strict procedure, and provides transparency of Asian supply chain cost, value, and risk.

OUR POLICIES

For many years, Brenntag has been committed to the highest forms of business conduct and ethics in our operations and supply chain. That commitment forms a cornerstone for many of our policies, procedures, and our approach to business. At Brenntag, safety, responsibility and sustainability are fundamental aspects of the corporate strategy. In October 2014, Brenntag Group joined the UN Global Compact (UNGC), the first ever chemical distributor to join. This was a conscious and logical step for us, through which we officially signed up to the initiative's ten principles. UNGC is a strategic initiative for companies committing to align their business activities and strategies with ten universally recognised principles in the areas of human rights, labour standards, environmental protection and fighting of corruption. With more than 12,000 participants from over 145 countries, it is the world's largest joint initiative of socially committed companies and other stakeholders. These principles complement the standards which we apply in evaluating all of our business activities. Brenntag

recognises that only through the joint commitment of all stakeholders within the chemical industry can we be sure that any form of slavery is eradicated. Sustainability issues such as health, safety and environmental protection, working practices, supplier management and governance are becoming increasingly important criteria when choosing business partners and making purchasing decisions. Therefore, Brenntag maintains a close and ongoing dialogue with its suppliers and customers.

Brenntag Group is also a member of the chemical industry's initiative "Together for Sustainability" ("TfS") and undergoes external assessment by EcoVadis, a leading independent provider of Corporate Social Responsibility ("CSR") assessments. CSR Assessments evaluate policies and actions implemented by suppliers to comply with internationally recognised human rights standards and frameworks for slavery and human trafficking. This includes the Guiding Principles on Business and Human Rights, the United Nations Global Compact and ISO 26001.

COMMUNICATION

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. Regular training is provided through the Brenntag Group-wide e-learning platform in order to keep employees' knowledge of all 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.

Brenntag has implemented numerous measures developed centrally by various departments such as Sustainability and Compliance Brenntag Group. Employees can report human rights violations via the whistleblowing system. External third parties can also use this system. In the course of 2022, Brenntag did not receive any reports of human rights violations within the company.

EFFECTIVE RISK ASSESSMENT AND DUE DILIGENCE

Brenntag believes that the biggest risk of potential violations of human rights is in our supply chain. Brenntag has processes in place to support periodic assessment and management of risks associated with our partner engagements, direct business operations and business relationships. We will not work with customers, suppliers or sub-contractors who do not share our commitment to high ethical standards, particularly in relation to modern slavery. Brenntag Group has drawn up a Supplier Code of Conduct specifying what we expect of our suppliers in the areas mentioned. The Code is based on the principles of the UNGC, the chemical industry's global Responsible Care programme and Brenntag's Code of Business Conduct and Ethics. Brenntag's Supplier Code of Conduct explicitly requests that our suppliers support the observance of international human rights and that they avoid violations of human rights.

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.

BRENTAG AS A SUPPLIER

Brenntag makes its own principles and activities transparent and measurable in various ways. As well as reporting on our progress in the field of sustainability globally within our Annual Report, this also includes our own regular EcoVadis assessment and issue-specific audits at Brenntag locations. Brenntag has previously undergone several EcoVadis assessments. In its most recent assessment, the results of which were published in December 2022, the Brenntag Group achieved a score of 77 points, the highest result in the company's history. Brenntag was awarded the EcoVadis platinum medal for this result and thus ranks among the top 1% of all companies rated by EcoVadis.

SUPPLIER MANAGEMENT and ECOVADIS SUSTAINABILITY ASSESSMENTS

Within the scope of its TfS membership, Brenntag requires a minimum number of its suppliers to undergo sustainability assessments every year. We thereby achieve greater transparency in relation to our suppliers' performance and are able to better consider sustainability issues in our purchasing decisions.

We work together with EcoVadis, as TfS does, which is a leading provider of sustainability assessments and is well established in the chemical industry. EcoVadis evaluates companies in the category of 'labour and human rights' (among others). Based on the responses provided by the companies in a comprehensive online questionnaire and on their accompanying documentation, EcoVadis awards scoring points and creates a detailed profile of strengths and weaknesses, as well as specific suggestions for improvement. Measured by its total chemical spend (in EUR), Brenntag covered around 75% through such sustainability assessments or audits in 2022. On a particularly encouraging note, the company continues to see its suppliers making considerable advances in improving their sustainability performance. By the end of 2022, 69% of suppliers globally who underwent reassessment had improved their score compared with the previous year.

This figure is particularly high in the group of suppliers that had a relatively low score of under 45 in the previous year. As many as 73% of suppliers that underwent reassessment in 2022 managed to improve their score by at least one point compared with the previous assessment.

GERMAN SUPPLY CHAIN DUE DILIGENCE ACT ('GSCA')

Brenntag UK Holding's ultimate parent company, Brenntag SE is in the process of implementing the GSCA which came into effect in Germany on 1st January 2023. Brenntag needs to be compliant from 2024. The GSCA requires companies to create maximum transparency in the supply chain and their own area of business, carry out risk analysis and implement actions to prevent potential breaches of due diligence obligations. In 2022, Brenntag centrally set up an interdisciplinary team of experts from the various departments, including sustainability, compliance, legal and procurement, which deals explicitly with implementing the requirements.

In addition to existing EcoVadis assessments or Tfs audits, this will be based on an innovative IT solution that works both with publicly accessible information (via media for example) and with artificial intelligence. Brenntag SE has also appointed a human rights officer, who will monitor risk management, review the effectiveness of preventive and corrective actions, and regularly inform management about potential incidents.

OUR COMMITMENT

Brenntag will continue to train and engage with its suppliers with a greater focus on sustainability (including the ongoing development and implementation of a CO² calculator) and human rights issues, through making greater use of the Tfs Academy and e-learning resources. Brenntag is committed to continuously developing measures to further reduce potential risks within global supply chains and aims to have all its suppliers covered by risk management.

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

SIGNED 17/6/2023
..... FOR THE FINANCIAL YEAR 2022 (1 JANUARY 2022 TO 31 DECEMBER 2022)
FOR BRENNTAG UK HOLDING LIMITED