

Supplier Code of Conduct (2023)

A Supplier in this Code of Conduct is defined as any non-Brenntag entity that provides goods or services to Brenntag, including product suppliers, service providers, distributors, agents, consultants, and others.

Brenntag SE and all its subsidiaries (hereafter “Brenntag” or “we”) are committed to conducting all business to the highest degree of the law and business ethics with Brenntag’s social and environmental responsibility in mind as outlined in [Brenntag’s Code of Business Conduct and Ethics](#).

Brenntag has committed itself to the [Ten Principles of the United Nations \(UN\) Global Compact](#), which are derived from the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights to Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption. Brenntag is furthermore an ongoing member of “Together for Sustainability” a member-driven initiative of the chemical industry to ensure that commercial success is sustainable and in line with corporate social responsibility.

As part of this commitment, our Suppliers shall adhere to all applicable laws and regulations related to the topics outlined below. In addition, our Suppliers shall adhere in particular to the core values and standards set forth in this Supplier Code of Conduct (hereafter “Code”).

GOOD GOVERNANCE BUSINESS PRACTICES

Anti-Corruption

Our Suppliers shall conduct their business without engaging in corrupt practices, which means in particular that they may not solicit, give, or receive bribes (incl. unlawful facilitation payments) or unlawful kickbacks. They shall not take advantage of anyone through unfair business dealings, gain an undue / unlawful business advantage, or give the appearance of improper conduct. They shall take particular care when engaging in donations or sponsoring activities and when giving or receiving gifts, invitations, or other benefits, which may never give the appearance of impropriety.

Public Officials

Our Suppliers shall ensure that any interaction with public officials and politically exposed persons is always conducted with care and in line with relevant laws in order to ensure that no unlawful business advantage is obtained through the interaction.

Anti-Money Laundering and Fraud Prevention

Our Suppliers shall take appropriate measures to prevent money-laundering and prevent fraud in their business, including informing or training the relevant employees on the subject.

Avoidance of Conflicts of Interest

Our Suppliers shall ensure that the interests of the business and the interests of their employees are strictly segregated in order to ensure that business decisions – especially those related to Brenntag – are only made based on an objective-decision-making process.

Books and Records

Our Suppliers shall maintain accurate books and records, and not alter any record to conceal or misrepresent any underlying transaction. Especially with regard to the import and export of goods, our Supplier shall complete, maintain and update records of the country of origin of products, their tariff status, and the value of their imports and exports.

Fair Competition

Our Suppliers shall adhere to all applicable antitrust and competition laws and shall take appropriate care to safeguard sensitive information where necessary.

Foreign Trade Compliance

If our Suppliers are subject to trade and custom laws, they shall ensure that these regulations are observed regarding the import and export of goods, services, and information by implementing appropriate processes and procedures. They must not engage in business with any person, organization or country that is subject to relevant sanctions under these laws.

Privacy and Data Protection

Our Suppliers shall adhere to applicable privacy and data protection laws regarding the processing of the data with whom they conduct business, including suppliers, customers, consumers, employees, and others. They shall take particular care to protect special categories of personal data, confidential, and proprietary information.

HUMAN RIGHTS & WORKING CONDITIONS**Fair Treatment**

Our Suppliers shall provide a working environment that is free from harassment, including but not limited to sexual harassment, corporal punishment, torture, coercion, verbal abuse, and discrimination. If employing or contracting third party service providers such as security personnel, our Suppliers shall take measures to ensure that they act in accordance with the law and contributes to a work environment free of harassment.

Freedom of Association

Our Suppliers shall respect the rights of their employees to associate freely, seek representation, join works councils or unions, and engage in collective bargaining. Employees who act as workers' representatives shall not be disadvantaged or discriminated against.

No Involuntary Labor or Child Labor

Our Suppliers shall not tolerate any kind of involuntary or forced labor, including but not limited to bonded, indentured, involuntary prison labor or child labor. They shall with particular care observe all applicable laws and regulations in particular those relating to the employment of underage employees that participate in legitimate workplace apprenticeship or trainee programs.

Occupational Health and Safety

Our Suppliers shall ensure that their employees can work in a safe environment and shall take particular care to safeguard employees exposed to potential safety hazards in alignment with all applicable standards and/or regulations and by utilizing suitable means, e.g., safety training, appropriate personal protective equipment, or other means.

Rights of Local Communities

Our Suppliers shall protect the rights of local communities and indigenous peoples, in particular pertaining to activities related to the acquisition, development, or utilization of land, forests or water sources.

Wages

Our Suppliers shall remunerate their employees adequately, with at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. They shall ensure that employees' working hours do not exceed the maximum set by the applicable law.

Whistleblowing / Raising Concerns

Our Suppliers shall adhere to relevant whistleblower protection laws by providing their employees with access to a protected channel to report possible violations of applicable law and/or against the principles of this Code or their own internal codes and guidelines. Employees who raise their concerns in good faith shall be protected from retaliation by our Suppliers.

Concerns regarding Brenntag's business or issues relating to Brenntag's business may also be raised in good faith via Brenntag's whistleblowing channel on the Brenntag website ([Compliance \(Whistleblowing\)](#))

ENVIRONMENTAL RESPONSIBILITY

Environmental

Our Suppliers shall comply with all applicable health, safety and environmental laws and regulations. They shall (i) obtain and maintain all required environmental permits and registrations, (ii) conform to applicable labelling and warning requirements; and (iii) identify, manage, store, transport and handle hazardous substances in accordance with law.

Our Suppliers shall take appropriate measures to reduce direct and indirect greenhouse gas emissions, driving continuous improvements towards a scientifically based emission target.

Conflict Minerals

Our Suppliers shall ensure that products supplied to Brenntag do not contain metals derived from minerals or their derivatives originating from conflict regions, which directly or indirectly finance or benefit armed groups. Where applicable, current EU regulations establishing supply chain due diligence obligations apply.

Quality

Our Suppliers shall take due care to ensure their work product meets applicable quality standards. They shall at no point misrepresent their product and will put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products.

ENFORCEMENT OF THE CODE

In case any of the provisions herein conflict with either contractual stipulations between the Supplier and Brenntag, or Brenntag's General Terms and Conditions of Purchase, the contractual stipulations or the General Terms and Conditions of Purchase shall prevail.

Management Systems and Supply Chain Governance

Our Suppliers shall have in place appropriate management systems that facilitate an adherence to applicable laws. They shall continuously work on the improvement of processes and procedures. Our Suppliers shall ensure that the principles set for in this Code are addressed within their own supply chain in line with applicable laws.

Consequences

Brenntag reserves the right to review or discontinue its business relationship with any Supplier based on their adherence to international principles or principles in this Code, failure to correct violations, or displaying a pattern of non-compliance. Brenntag reserves the right to take adequate measures as part of such a review, which may include, but are not limited to additional assessments, (on-site) audits or specific document review.

Additional Information

For more information, see:

- [Sustainability](#)
- [Compliance \(Whistleblowing\)](#)

Compliance and Acknowledgement

Our Suppliers acknowledge the values and principles stated in this Code.

Alternatively, Suppliers shall demonstrate their commitment through their own code of conduct or other formal corporate policies that embody these values and standards.