

Connecting**Chemistry**



MODERN SLAVERY STATEMENT

2021

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Modern Slavery Statement

INTRODUCTION FROM THE PRESIDENT, BRENNTAG UK HOLDING LIMITED

Slavery and human trafficking remains 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

Brenntag is 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. Brenntag UK & Ireland operates at 19 locations, employs 876 people and generates a turnover of £437 million annually.

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. Our supply chain includes various forms of assets (human, financial and physical) and goods and services. As a global distributor, our people are our greatest asset. 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.

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 highly skilled specialists for the different industries who closely cooperate with Brenntag regions worldwide. Our purchasing staff in the UK has full access to the GSO network when purchasing goods globally which is a major benefit to Brenntag’s customers.

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 we 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. The company is a member of the chemical industry’s initiative “Together for Sustainability” (“TfS”), has developed a bespoke Supplier Code of Conduct (“the Code of Conduct”), 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.

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.

Brenntag’s supplier/subcontractor on-boarding requirements dictate that business partners adhere to Brenntag’s policies. 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. 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 (“Amber Road”). Suspected matches are thoroughly investigated and escalated as appropriate before trading is allowed to commence.

EFFECTIVE RISK ASSESSMENT AND MANAGEMENT

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.

Our Code of Business Conduct and Whistleblowing Policy provide a process for reporting or raising concerns about any wrongdoing to the Group Compliance Officer, in confidence and without fear of retaliation.

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 training to relevant members of staff. Brenntag’s Directors are committed to the subject and ongoing reviews of the training criteria.

ACTION TAKEN AND NEXT STEPS

In 2018, training was delivered to all Brenntag staff members on the subject of Modern Slavery and how to recognise signs of when a breach may have occurred. During 2019 refresher training was delivered to all relevant staff on the topic of Modern Slavery which included making staff aware of the

wider steps that the company is taking globally to ensure that we only engage with suppliers who adhere to Brenntag’s high ethical standards.

Brenntag specifically audited its GSO order process to establish if similar procedures apply to relationships with global suppliers, as part of its risk-based assessment approach. This entailed engaging with key staff members in the UK who frequently purchase products via the GSO network. The exercise allowed us to map out the current end to end process when it comes to purchasing goods from the relevant regions.

We have, as an outcome over the course of 2020 and early 2021, developed and implemented processes and tools to assess GSO supplier compliance with the Code of Conduct and international standards for trade and social responsibility. A Statement of Compatibility, incorporating compliance with the Code of Conduct, is being issued to all GSO suppliers, new and existing, with a requirement for signature.

In addition, GSO’s terms and conditions require as standard that all suppliers observe the Code of Conduct, which enlists Brenntag’s commitment to anti-bribery, trade controls and human rights. A bespoke Trade Compliance Statement has been developed for customers to reiterate GSO’s commitment to integrity and compliance with all applicable laws, regulations and ethical standards in each of the markets where they operate.

A Social Accountability Questionnaire is also being implemented to identify issues/deficiencies with potential suppliers. Additional origin linked questions have been developed in response to UK Government’s measures related to specific regions in China to further bolster screenings.

In its April 2020 EcoVadis assessment, Brenntag Group was awarded 71 points thereby maintaining its ‘gold’ status already achieved in 2016 (Gold Recognition Level). The result ranked Brenntag among the top 1% of companies in our industry, as well as among the top suppliers assessed overall by EcoVadis across all industry categories. As part of its TFS membership, Brenntag has been encouraging its own suppliers to undergo an EcoVadis self-assessment, which includes a labour practices and fair business practices category. Some 69% of our total chemical spend globally scored 45 or higher in their EcoVadis evaluation.

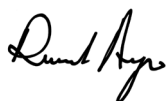
In 2020 we introduced a measure, whereby suppliers whose EcoVadis rating is below 45 will automatically receive advice on specific potential improvements to make it easier for them to achieve further progress.

Brenntag globally set itself a target to assess at least 80% of its total chemical spend (in €) through sustainability assessments and audits by the end of 2020. We almost reached this target: By the end of 2020, some 76% of total chemical spend had undergone assessment. Where reassessments had been triggered, an improvement rate of 58% had been achieved and some 33% of suppliers had bettered scores on labour and human rights.

Aside from total chemical spend, we intend to particularly focus on low scores in risk countries. We regard it as a great achievement that a total of around 1,300 of our suppliers worldwide underwent assessments between the launch of the programme in 2016 and the end of 2020, despite the unique challenges posed by the SARS-Cov-2 pandemic over the course of 2020 leading to widespread postponement of physical assessments and audits.

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 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:



RUSSEL ARGO
BES PRESIDENT REGION NORTH



RICHARD WARD
BES PRESIDENT UK & IRELAND



CHERYL-ANNE SALTON
HEAD OF HR,
BRENNTAG UK & IRELAND

SIGNED 10 JUNE 2021 FOR THE FINANCIAL YEAR 2020 (1 JANUARY 2020 TO 31 DECEMBER 2020)
FOR BRENNTAG UK HOLDING LIMITED.

BRENNTAG UK & IRELAND

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