

## BRENNTAG'S MODERN SLAVERY STATEMENT

Modern 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 is committed to improving its 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 that Brenntag Australia Pty. Ltd. and Brenntag New Zealand Limited (together "**Brenntag ANZ**") have taken to address the risks of modern slavery and human trafficking in our business.

### OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Brenntag ANZ is part of the Brenntag global group of companies. As a global distributor, Brenntag distributes specialty and industrial products, raw materials and chemicals. We connect manufacturers (our suppliers) and users (our customers) and provide complete distribution solutions as well as individual products.

In Australia and New Zealand, Brenntag ANZ has established itself as a market leader in the import and distribution of materials and chemicals together with logistical services for Speciality (Nutrition, Pharma, Personal Care / HI&I (Home, Industrial & Institutional), Material Science (Coatings & Constructions, Polymers, Rubber), Water treatment and Lubricants) and Essential (broad portfolio of process chemicals across a wide range of industries and applications) commercial and industrial manufacturing industries.

Brenntag ANZ operates throughout Australia and New Zealand with outsourced warehouse and distribution facilities. Brenntag ANZ's main offices are in Melbourne, Sydney and Auckland with minor offices in Brisbane and Perth.

Brenntag ANZ consists of two entities: Brenntag Australia Pty Ltd and Brenntag New Zealand Limited, with each entity operating its own sales force but with shared resources.

Brenntag ANZ's stakeholders include:

- (a) Suppliers and sub-contractors;
- (b) Customers;
- (c) Governmental authorities;
- (d) Shareholders (as listed on German Stock Exchange);
- (e) Community (members of Responsible Care, Vinyl Council, Chemistry Australia); and
- (f) Brenntag Asia Pacific & Brenntag Global.

### 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.

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## UN Global Compact

At Brenntag, safety, responsibility and sustainability are fundamental aspects of the corporate strategy. In October 2014, Brenntag was the first chemical distributor to join the UN Global Compact. 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. These principles complement the standards which we apply in evaluating all our business activities.

## Anti-Slavery and Human Trafficking

Brenntag has implemented a comprehensive Anti-Slavery and Human Trafficking Policy which prohibits the use of child or forced labour anywhere within its business. It also forbids Brenntag from 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.

## Supply Chain

Brenntag recognises that only through the joint commitment of all stakeholders within the chemical and specialty ingredients industry can we be sure that any form of modern slavery is eradicated. Therefore, Brenntag maintains a close and ongoing dialogue with its suppliers, partners and customers.

Brenntag is a member of **“Together for Sustainability”** (“TFS”). The TFS is a global assessment and audit program for the chemical industry which aims to assess and improve sustainability practices within the supply chains of the chemical industry.

## DUE DILIGENCE

At Brenntag ANZ, we conduct evaluations on new suppliers in specific industries 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.

Our suppliers are encouraged 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 we 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 supplier/subcontractor on-boarding requirements mandate that business partners adhere to Brenntag’s policies, including the Supplier Code of Conduct. 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.

## EFFECTIVE RISK IDENTIFICATION, ASSESSMENT AND MANAGEMENT

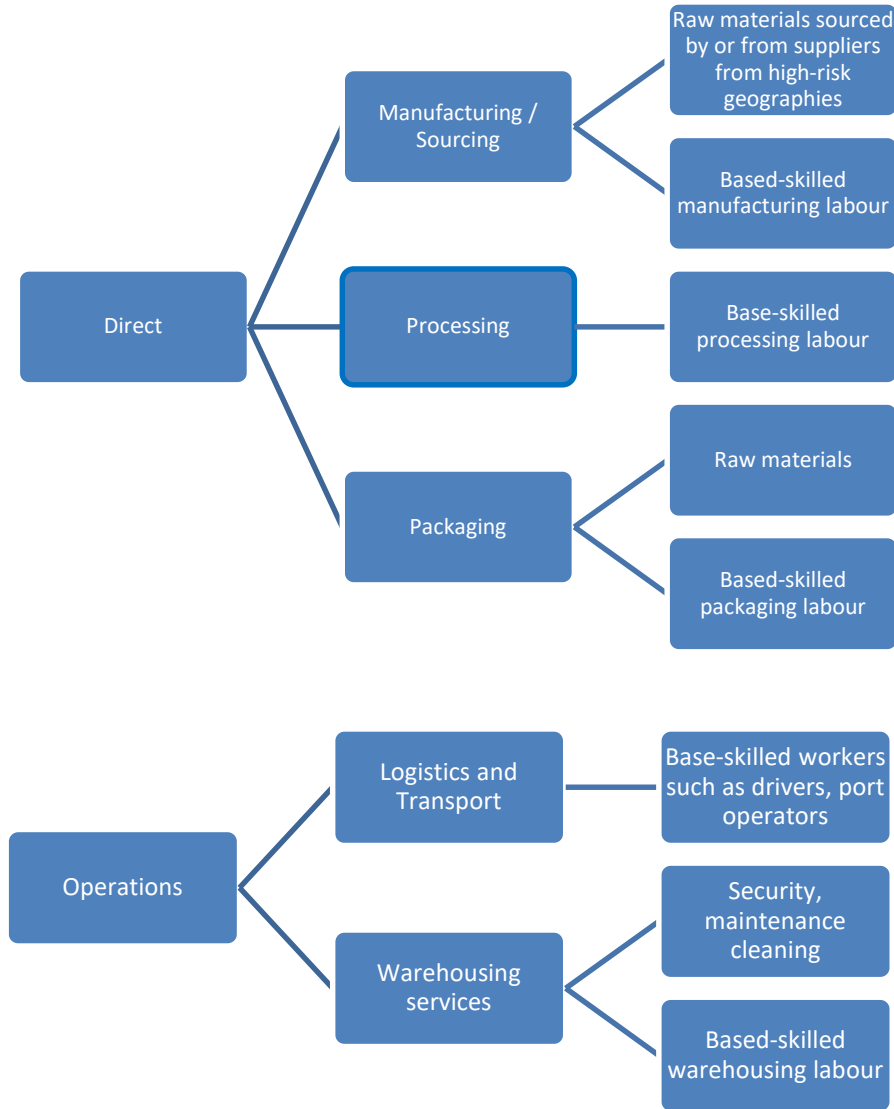
We have processes in place to support periodic risk identification, assessment and management associated with our partner engagements, direct business operations and business relationships in high-risk countries. Internal risk-mapping will also be conducted for Brenntag’s supply chain operations in high-risk countries.

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Currently, Brenntag has identified the following potential risk categories of modern slavery in its business.



Existence of high-risk factors in Brenntag's operations or supply chain will trigger further investigation to ensure higher controls are in place to manage elevated risks. Where necessary, Brenntag will liaise directly with suppliers and customers to gain proper understanding on whether they have measures adopted to ensure that modern slavery is not occurring within their own businesses. Brenntag's standard contracts will incorporate specific prohibitions against slavery, servitude, the use of forced, trafficked or child labour. Brenntag will also request that suppliers undertake to comply with the same standards adopted by Brenntag as regards anti-modern slavery. A committee will also be established to annually assess Brenntag's anti-modern slavery readiness.

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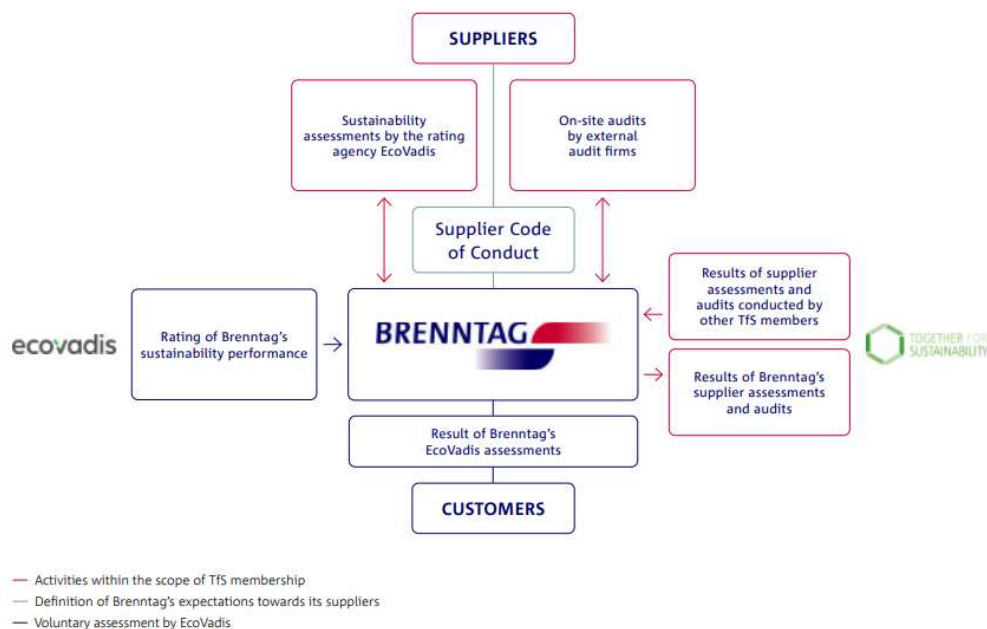


We will not work with customers, suppliers or sub-contractors who do not share our commitment to high ethical standards, particularly in relation to modern slavery. Our Code of Business Conduct and Whistleblowing Policy provide a process for reporting or raising concerns about any wrongdoing to the Group Compliance Officer, in confidence and without fear of retaliation.

### ACTION TAKEN AND NEXT STEPS

As published in the **Brenntag Sustainability Report 2021**, Brenntag intends to increase focus on the sustainability performance of its suppliers in the future. A risk assessment will be added to the existing procedures in order to better manage human rights and environmental risks in the supply chain in the future and to be compliant with the German Supply Chain Due Diligence Act. Brenntag aims to include and review all suppliers in an internal risk management system by latest 2025. As part of Brenntag's "**Future Sustainable Brenntag**" vision, Brenntag seeks to ensure that human rights are seamlessly upheld in its supply chain and living wages are paid.

### RESPONSIBILITY IN THE SUPPLY CHAIN



As a member of TFS, Brenntag has developed a bespoke Supplier 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.

In its January 2022 EcoVadis assessment, Brenntag was awarded 71 points thereby maintaining its ‘gold’ status already achieved in 2016 (Gold Recognition Level). The result ranked Brenntag among the top

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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. Brenntag set itself a target to assess at least 80% of its total chemical spend through sustainability assessments and audits by the end of 2021. By the end of 2021, some 75% of total chemical spend had undergone assessment. Where reassessments had been triggered, an improvement rate of 65% had been achieved.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, Brenntag provides regular training to staff on how to identify risks of modern slavery in its operations and supply chain. Where necessary, Brenntag will liaise directly with new suppliers to gain proper understanding on whether they have an anti-slavery policy and measures in place to ensure that modern slavery is not occurring within their own businesses.

## CONCLUSION

Brenntag is against modern slavery and is committed to tackling modern slavery in its operations and supply chain. Brenntag ANZ is pleased to submit this Modern Slavery Statement in accordance with section 13 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) for the financial year ending 31<sup>st</sup> December 2021.

This Modern Slavery Statement has been approved by the Board of Directors of Brenntag Australia Pty Ltd and Brenntag New Zealand Limited on 22 June 2022.

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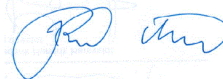


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**Shane Nairn**

Director of Brenntag Australia Pty Ltd and Brenntag New Zealand Limited

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**Knud Mohr**

Director of Brenntag Australia Pty Ltd and Brenntag New Zealand Limited

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