



## BRENTTAG'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), from taking place in any part of our business or supply chain.

This statement sets out the steps that Brenntag Australia Pty. Ltd., Ravenswood Ingredients 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.

### 1. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Brenntag ANZ is part of the Brenntag global group of companies. As a global distributor, Brenntag distributes specialty ingredients 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 ingredients together with logistical services for Speciality (Nutrition, Pharma, Beauty & Care), Material Science (CASE, Construction, Polymers & Rubber) and Essential chemicals (broad portfolio across various industries and applications including, AdBlue, Water Treatment and Lubricants) for commercial and industrial manufacturing sectors. Brenntag ANZ operates throughout Australia and New Zealand with internal and outsourced warehouse and distribution facilities. Brenntag ANZ's main offices are in Melbourne, Sydney and Auckland.

Following Brenntag's acquisition of Ravenswood, Ravenswood Ingredients Pty. Ltd began its integration journey, including integration of Brenntag's modern slavery policies and commitment, due for completion in 2024.

Brenntag ANZ's stakeholders include:

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

**Brenntag Australia Pty. Ltd.**  
**ABN: 84117 996 595**  
 Level 5, 10 Nexus Court,  
 Mulgrave 3170  
 PO Box 48, Mulgrave 3170  
 Victoria, Australia  
 Phone +61 (3) 9559 8333  
 Fax +61 (3) 9532 0802  
 info-aus@brenntag-asia.com  
 www.brenntag-asia.com

**Brenntag New Zealand Limited**  
 Level 2, Building C, 602 Great South Road  
 Ellerslie, Auckland 1051 New Zealand  
 PO Box 8111 Symonds Street  
 Auckland 1150 New Zealand  
 Phone +64 (9) 275 0745  
 info-nz@brenntag-asia.com



## 2. 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.

### 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. This includes Brenntag's global compliance to the German Supply Chain Act (LkSG) which came into force 1 January 2024, imposing obligations on German businesses to prevent or end human rights and environmental violations.

### 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.

As part of our commitment to excellence as well as the global increase in supply chain regulations, including the German Supply Chain Act, we have launched our updated [Supplier Code of Conduct](#) which outlines in greater detail our expectation that all our suppliers comply with:

- all applicable laws and regulations,
- principles related to good governance business practices,
- human rights and appropriate working conditions, and
- environmental responsibility.



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.

### 3. DUE DILIGENCE

[Brenntag’s Policy Statement on Human Rights](#), approved by the Board of Management, underscores our commitment to protecting and advocating for Human Rights in our own business area and our supply chain. It outlines our due diligence system fulfills this commitment to identify and mitigate relevant human rights risks that are connected to Brenntag

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.

### 4. EFFECTIVE RISK IDENTIFICATION, ASSESSMENT AND MANAGEMENT

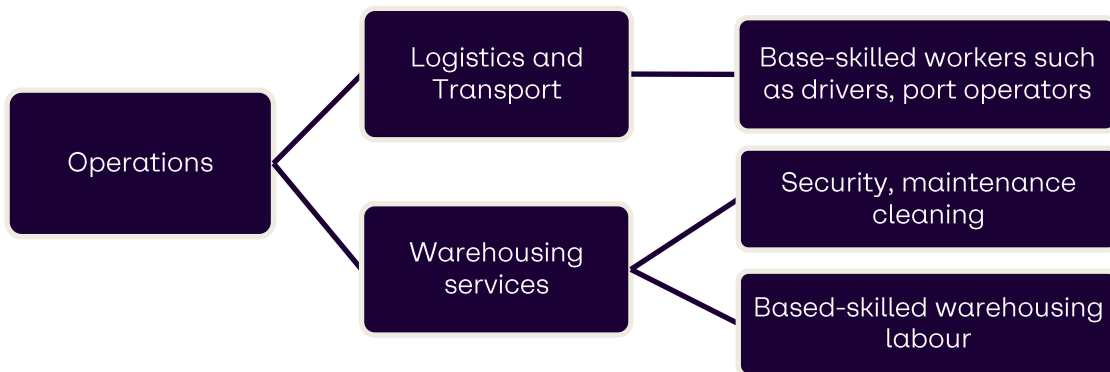
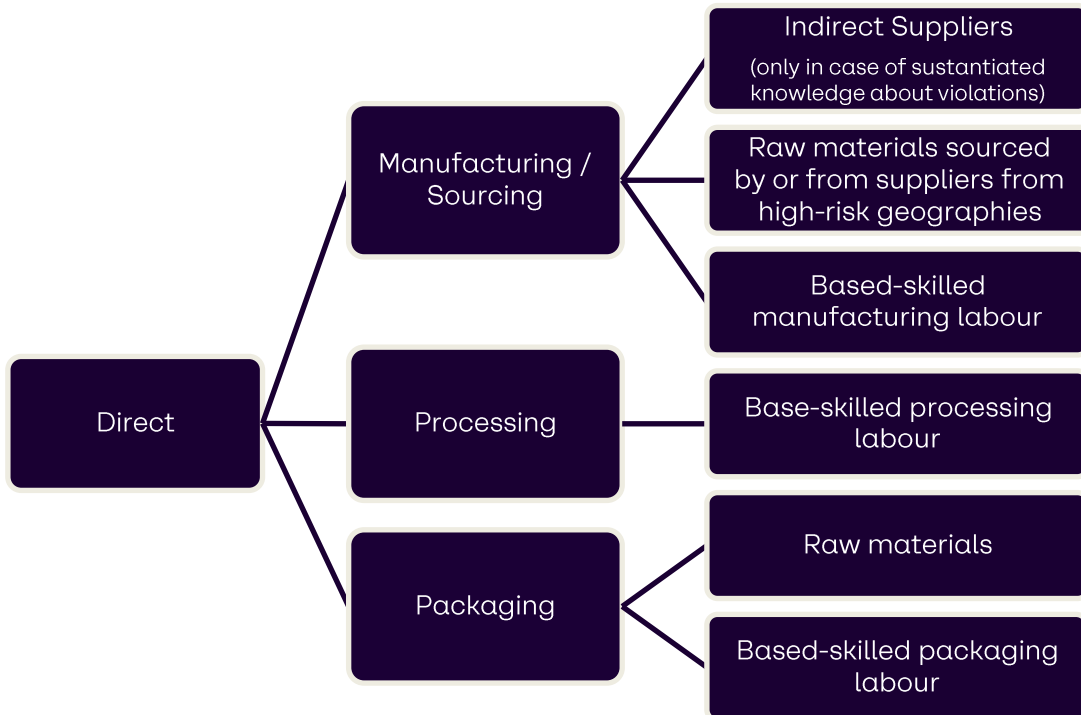
We have processes in place to support periodic risk identification, assessment and management associated with our partner engagements, direct business operations and business relationships in high-risk countries. Internal risk-mapping will also be conducted for Brenntag’s supply chain operations in high-risk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

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

**Brenntag Australia Pty. Ltd.**  
**ABN: 84117 996 595**  
 Level 5, 10 Nexus Court,  
 Mulgrave 3170  
 PO Box 48, Mulgrave 3170  
 Victoria, Australia  
 Phone +61 (3) 9559 8333  
 Fax +61 (3) 9532 0802  
 info-aus@brenntag-asia.com  
 www.brenntag-asia.com

**Brenntag New Zealand Limited**  
 Level 2, Building C, 602 Great South Road  
 Ellerslie, Auckland 1051 New Zealand  
 PO Box 8111 Symonds Street  
 Auckland 1150 New Zealand  
 Phone +64 (9) 275 0745  
 info-nz@brenntag-asia.com





**Brenntag Australia Pty. Ltd.**  
**ABN: 84117 996 595**  
Level 5, 10 Nexus Court,  
Mulgrave 3170  
PO Box 48, Mulgrave 3170  
Victoria, Australia  
Phone +61 (3) 9559 8333  
Fax +61 (3) 9532 0802  
info-aus@brenntag-asia.com  
www.brenntag-asia.com

**Brenntag New Zealand Limited**  
Level 2, Building C, 602 Great South Road  
Ellerslie, Auckland 1051 New Zealand  
PO Box 8111 Symonds Street  
Auckland 1150 New Zealand  
Phone +64 (9) 275 0745  
info-nz@brenntag-asia.com





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.

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.

## 5. ACTION TAKEN AND NEXT STEPS

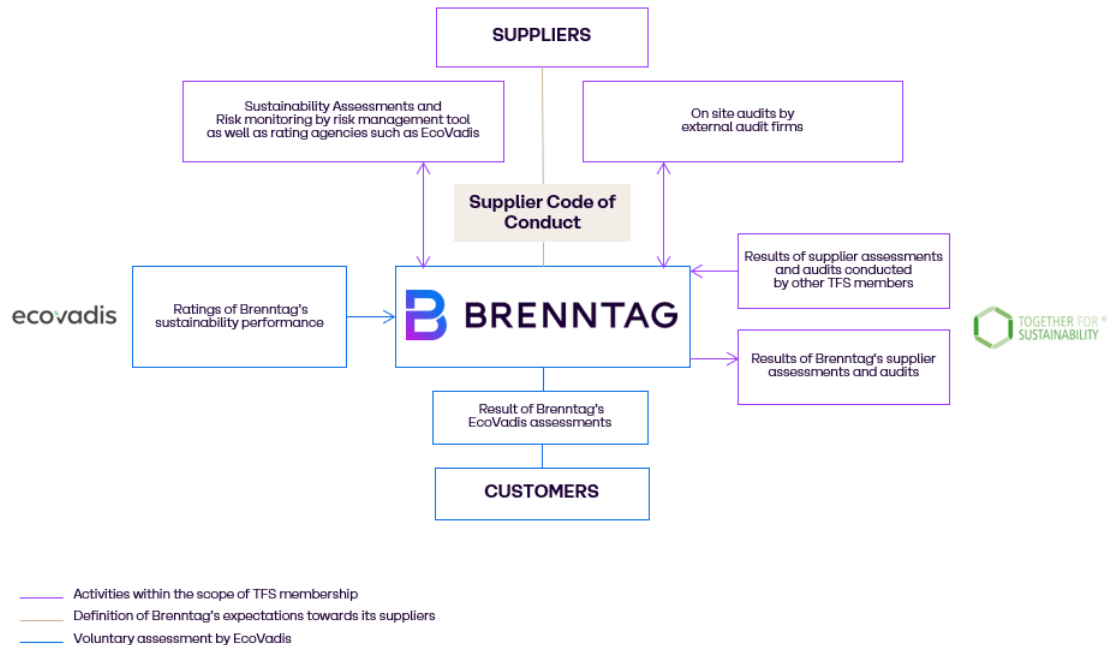
As published in the **Brenntag's Non-Financial Report 2023**, Brenntag worked hard to prepare ourselves for the German Supply Chain Due Diligence Act. For example, we carried out a risk assessment on several thousand of our suppliers in order to identify and minimize risks of human rights violations. In addition to existing EcoVadis assessments or TFS audits, this was based on an innovative IT solution that works both with publicly accessible information (via media, for example) and with artificial intelligence. The company 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 in future. In the reporting period, 100% of Brenntag's relevant suppliers underwent initial risk assessment process. In addition, the company will continue working to also train its suppliers with a greater focus on sustainability issues, to which end it will make greater use of the TFS Academy or e-learning resources, for example. Brenntag is continuously developing measures to further reduce potential risks within global supply chains. Going forward, the company will continue to constantly expand its commitment to respecting human rights across worldwide supply chains. Not least of all, Brenntag aims to have all suppliers covered by risk management.

**Brenntag Australia Pty. Ltd.**  
**ABN: 84117 996 595**  
 Level 5, 10 Nexus Court,  
 Mulgrave 3170  
 PO Box 48, Mulgrave 3170  
 Victoria, Australia  
 Phone +61 (3) 9559 8333  
 Fax +61 (3) 9532 0802  
 info-aus@brenntag-asia.com  
 www.brenntag-asia.com

**Brenntag New Zealand Limited**  
 Level 2, Building C, 602 Great South Road  
 Ellerslie, Auckland 1051 New Zealand  
 PO Box 8111 Symonds Street  
 Auckland 1150 New Zealand  
 Phone +64 (9) 275 0745  
 info-nz@brenntag-asia.com



## 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.

Brenntag already has voluntarily undergone several EcoVadis assessments. In its December 2022 assessment, Brenntag Group was awarded 77 points and thereby reached platinum status for the first time. In May 2024 Brenntag Group was awarded 81 points and held its platinum status. The result ranks Brenntag among the top 1% companies across industries as well as among the top suppliers assessed overall by EcoVadis.

Brenntag is keen to achieve further scoring improvements. Moreover, as part of its "Together for Sustainability" membership, Brenntag encourages its own suppliers to undergo an EcoVadis self-assessment. 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.


### 6. 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 14 of the Modern Slavery Act 2018 (Commonwealth Act of Australia) for the financial year ending 31<sup>st</sup> December 2023. In preparation of this joint statement, the relevant companies owned or controlled by Brenntag ANZ were actively engaged and consulted.

This Modern Slavery Statement has been approved by the Board of Directors of Brenntag Australia Pty Ltd, Ravenswood Ingredients Pty. Ltd and Brenntag New Zealand Limited on 28<sup>th</sup> June 2024.

**Melanie Salberg**  
Managing Director, New Zealand

**Russell Major**  
Managing Director, Australia

DocuSigned by:  
  
73BCD52F3A81498...

Signed by:  
  
797C3F1E1A8343E...

6/28/2024

6/28/2024

**Brenntag Australia Pty. Ltd.**  
ABN: 84117 996 595  
Level 5, 10 Nexus Court,  
Mulgrave 3170  
PO Box 48, Mulgrave 3170  
Victoria, Australia  
Phone +61 (3) 9559 8333  
Fax +61 (3) 9532 0802  
info-aus@brenntag-asia.com  
www.brenntag-asia.com

**Brenntag New Zealand Limited**  
Level 2, Building C, 602 Great South Road  
Ellerslie, Auckland 1051 New Zealand  
PO Box 8111 Symonds Street  
Auckland 1150 New Zealand  
Phone +64 (9) 275 0745  
info-nz@brenntag-asia.com

