

Connecting**Chemistry**



MODERN SLAVERY STATEMENT

2017



Modern Slavery Statement

INTRODUCTION FROM THE PRESIDENT, BRENNTAG UK & IRELAND

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, however small, in our business and in the wider supply chain. **Brenntag UK Holding Ltd** and its associated companies (“Brenntag”) are committed to improving our practices to prevent all forms of modern slavery (including slavery, servitude, forced or compulsory labour and human trafficking, as well as child labour), taking place in any part of our business, or supply chain. This statement sets out the steps we have taken during the financial year to implement this commitment and we expect the same commitment from our suppliers, contractors and business partners.

ORGANISATION STRUCTURE

Brenntag is the global market leader in chemical distribution, managing complex supply chains for both chemical manufacturers and consumers by simplifying market access to thousands of products and services. Brenntag UK & Ireland operates at 16 locations, employing 741 employees, and generating a turnover of £319 million.

OUR SUPPLY CHAIN

Our supply chain includes various forms of assets (human, financial and physical), and goods and services. As a global distributor, our people (human capital) are our greatest asset. Financial capital enables us to grow our business, while physical capital includes site-based facilities. We acquire goods and services from our global network to support delivery of products to customers within the life science, environmental and material science sectors. Brenntag is a full-line chemical distributor of both industrial and specialty chemicals using Logistics and transportation services, technical expertise, personal protection equipment with specialist support from subcontractors and manufacturers all over the globe.

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. So, joining the UN Global Compact (UNGC) in October 2014 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 recognized principles in the areas of human rights, labor standards, environmental protection and fighting 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 was the first-ever chemicals distributor to sign up to the UNGC.

Brenntag recognizes that only through the joint commitment of all stakeholders within the chemical industry can we be sure that any form of slavery be eradicated. Sustainability issues such as health, safety and environmental protection, working practices, supplier management and governance are 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 has joined the chemical industry’s initiative “**Together for Sustainability**”, has developed a **Supplier Code of Conduct**, and undergoes external assessment by **EcoVadis**, a leading provider of CSR assessments. CSR Assessments evaluate policies and actions implemented by suppliers to comply with internationally recognized 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.

Suppliers provide information and supporting evidence on their policies and actions through sector specific questionnaires. These cover human rights due diligence and certification schemes used by suppliers to verify that fair labour practices are used.

The questionnaires also ask suppliers to disclose information on their sustainable procurement selection criteria, third party audits and supplier capacity building. This provides buyers with visibility of supplier's efforts to prevent slavery and human trafficking. Moreover, Brenntag encourages its own suppliers to undergo an EcoVadis self-assessment, in order to achieve greater transparency regarding the sustainability performance within the supply chain.

Our Anti-Slavery, Child Labour and Human Trafficking Policy prohibits the use of child or forced labour in our business and any involvement by Brenntag 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 Requirements mandate that our subcontractors and suppliers adhere to Brenntag policies. Brenntag expects a joint commitment from its suppliers and subcontractors in support of business conduct and ethics and sustainability and against all forms of slavery and human trafficking. Accordingly, our standard form subcontractor/supplier agreements oblige suppliers and subcontractors to acknowledge and comply with Brenntag's policies in this regard.

DUE DILIGENCE AND EFFECTIVE RISK ASSESSMENT AND MANAGEMENT

Brenntag has processes in place to support on-going 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 & Ethics, 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 training to relevant members of staff. All Directors have are committed to the subject and ongoing reviews of the training criteria.

NEXT STEPS

Brenntag recognizes that we are exposed to the risk of slavery and human trafficking in our business operations and supply chains. We believe the greatest risk exists with our subcontractors and suppliers. We recognize different geographic locations and sectors present higher risks of slavery and human trafficking than others. Our global programs, described above, help us to manage this risk.

In addition, during the financial year ending 31 December 2017, Brenntag will continue to develop and enhance our risk assessment process to allow us to better understand the sectors and locations where our risk of slavery and human trafficking is the greatest. Once that assessment has been completed, Brenntag will review how we manage those risks, and measure our progress to ensuring no slavery and human trafficking is present within our operations and supply chain.

We will also continue to review our policies, processes and training going forward to make sure they appropriately address our commitment to eliminate slavery and human trafficking from our operations and supply chain. We will ensure we have robust management processes for identifying and managing modern slavery and human rights risks across our supply chain and ensuring awareness and training among our employees.

This statement is made pursuant to section 54(i) of the Modern Slavery Act 2015 and constitutes the Modern Slavery statement for Brenntag UK Holding Limited and its Subsidiaries.

SIGNED ON BEHALF OF THE BOARD OF DIRECTORS AND EXECUTIVE COMMITTEE:



RUSSEL ARGO
PRESIDENT, BRENNTAG UK & IRELAND

**SIGNED: 20 JANUARY 2017 FOR FINANCIAL YEAR 2016 (1 JANUARY 2016 TO 31 DECEMBER 2016)
FOR BRENNTAG UK HOLDING LTD.**

BRENNTAG UK & IRELAND

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