

Our Business Principles

All group-related employees are informed about the requirements of competition law as it applies, and will be given the proper support for observing the law.

■ Conflicts of interest with the Brenntag Group

Brenntag employees should avoid any kind of activity or interest that results in a conflict of interest.

■ Data privacy and information security

The regulations of data privacy laws and the top-level information security policy of the Brenntag Group will apply.

The privacy rights of third parties (e.g. employees, customers, etc.) must be observed at all times.

Any unauthorized access to information systems or the unjustified transmission of any data to third parties is prohibited.

■ Economic benefits for employees

Economic benefits received through the services of Brenntag Group companies will only be granted by decision of the management of the company concerned. Other benefits that do not meet these requirements may neither be granted nor used.

August 2008

This document provides only a summary of the minimum standards we are expected to comply with. Additional policies, procedures and standards are still valid, and must continue to be observed as before.

These Business Principles do not endow any rights upon any party.

Brenntag Holding GmbH
Stinnes-Platz 1
45472 Mülheim an der Ruhr
Germany
www.brenntag.com

We are committed to integrity in our business transactions, in our dealings with customers, suppliers and competitors and towards our employees and the public.

As part of Brenntag, we each have a personal responsibility to act in strict compliance with the letter and the spirit of the laws, policies and regulations that Brenntag is subject to.

The following pages provide summaries and highlights of the policies and procedures which are particularly important to our business and for the preservation of our good name and reputation.

■ Philosophy

As a global company with around 300 locations all over the world, Brenntag is conscious of its obligation towards the environment and towards the health and safety of its employees.

Brenntag is aware that all business relationships with suppliers and customers are based on mutual trust and confidence. All the company's business processes take these responsibilities into account.

■ Obeying the law

Brenntag employees comply with all the laws of the countries in which they conduct business and with any international laws governing foreign operations.

■ International business

Brenntag employees are to be respectful of the values and customs of the communities and countries in which the company conducts business.

■ Health, safety and environment

Environmental protection, health protection and safety are all paramount for Brenntag and for preserving natural resources for the long term. If it can not be done safely, Brenntag will not undertake it.

In recognition of the Responsible Care / Responsible Distribution program of the International Council of Chemical Trade Associations, Brenntag affirms its commitment to sustainable development and to the guiding principles outlined in this worldwide initiative.

■ Dealing with business partners and state institutions

Brenntag draws a very clear line between the normal conditions of a business relationship and private interests, especially with regard to daily contacts with business partners and government agencies.

The selection of suppliers and services is always based on objective and factual criteria.

Brenntag affirms in all cases that any gifts and other donations that the company may accept or grant are not associated with any obligation.

■ Compliance Committee

The Brenntag Compliance Committee acts appropriately to set an overall corporate „tone“ for quality financial reporting, sound business risk practices, honesty, integrity and ethical behavior.

Brenntag has established procedures for receiving, registering and handling complaints and anonymous submissions concerning questionable matters. Confidentiality is assured, and no employee will suffer any consequences for submitting such complaints or anonymous submissions.

■ Internal controls

Brenntag has established procedures to ensure that any action or procedure which contravenes accepted business processes will be quickly uncovered.

These internal controls are periodically reviewed and evaluated to make sure they are communicated successfully and complied with.

■ Risk management

Brenntag has established procedures for monitoring and controlling risk exposures, including the company's risk assessment and risk management policies.

These procedures include measures to ensure that changes in business and potential risks are identified in time.

■ Accuracy of records & reporting of information

Brenntag demonstrates accountability in all its accounting and financial reporting practices, and all its employees accept responsibility for the accuracy of written records and public statements.

Brenntag's internal controls over financial reporting are consistent with the application of generally accepted accounting principles (GAAP). They protect financial accountability by ensuring that financial transactions are properly recorded and posted, satisfying government and other regulatory requirements.

■ Competition and antitrust law

Brenntag applies the principle of fairness and honesty in all its dealings with customers and suppliers.

No business will be transacted with suppliers or customers who use illegal procedures to gain a competitive advantage.

All group-related employees act in accordance with any (supra)national competition laws, regulations, treaties etc. that apply to our business activities. ▶