

# MULTISOL GROUP MODERN SLAVERY ACT (MSA) STATEMENT

(This statement is made pursuant to section 54(i) of the Modern Slavery Act 2015 and constitutes the Modern Slavery statement for Multisol Limited and its Subsidiaries and Affiliates.)
All preceding statements are available for public review via our website at: <a href="https://multisolgroup.com/">https://multisolgroup.com/</a>

#### Introduction from our CEO

Multisol Limited operates to the highest standards of safety, quality, professionalism, integrity, health and environmental management, an ethos demanded of every employee. Multisol Limited and its associated companies ("Multisol") 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 previous financial year to implement this commitment and we expect the same commitment from our suppliers, contractors and business partners.

## **Organisation Structure**

Multisol is a market leader in the blending and distribution of high value fuel and lubricant additives, base oils and specialty chemicals. Multisol was established in 1968 and operates across Europe, Africa and the Middle East, employing around 170 people at facilities in UK, France, Mauritius and South Africa. Multisol was acquired by the Brenntag Group in 2011.

## **Our Supply Chain**

Multisol distributes a portfolio of products from our industry leading suppliers and support the delivery of these products to our customers, ranging from global technology leaders and multinational petrochemical companies to regional and local industrial businesses and fuel and lubricant end users. Multisol holds certification for: ISO 9001, ISO 14001, ISO 45001, ESAD and is committed to the CBA's Responsible Care initiative.

## **Our Policies**

For many years, Multisol and our parent company, Brenntag UK Holding Limited have been committed to the highest standards of business conduct and ethics in our operations and supply chain. This commitment forms a cornerstone for many of our policies, procedures and our approach to business.

Safety is the top priority at Multisol and responsibility and sustainability are fundamental aspects of the corporate strategy. Multisol recognizes 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 increasingly important criteria when choosing business partners and making purchasing decisions. Therefore, Brenntag maintains a close and ongoing dialogue with its suppliers and customers.

Multisol's Anti-Slavery, Child Labour and Human Trafficking Policy prohibits the use of child or forced labour in our business and prevents 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.

Multisol's supplier/subcontractor requirements dictate our subcontractors and suppliers adhere to Multisol policies. Multisol 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 Multisol's policies in this regard.

### Effective Risk Assessment and Management

Multisol 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.

#### **Effective 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 group-wide training to staff. All Directors have received such training and are committed to the subject.

## **Progress and Next Steps**

This year, Multisol's Quality and Compliance team has continued to enhance its risk assessment processes. Revised 'New Customer' and 'New Supplier' questionnaires now include requirements for MSA compliance with a failsafe section for the Legal and Trade Compliance teams to complete necessary Amber Road reviews. These checks ensure that no trade is conducted with parties who may be blocked, sanctioned or are subject to any other restrictions, ensuring that we remain compliant with current regulations. This ensures a deeper scrutiny of third parties is conducted before any new business is commenced.

In addition, Multisol's parent company Brenntag has expanded its Trade Compliance team to enhance its monitoring of global sanctions screening, through its current software, Amber Road. This ensures it does not conduct business with sanctioned countries, entities or individuals. This is particularly relevant due to Multisol's global platform, which presents higher risks of slavery and human trafficking than others due to its potential to supply into sensitive locations. Multisol is working on a collaborative approach with the new team, to strengthen its already robust approach to compliance.

Refresher training to employees for a greater insight and awareness on Modern Slavery is due for completion in Q4 of 2023. This is particularly relevant following the UN's International Organisation for Migration's warning related to current global tensions.

Multisol's ultimate parent company, Brenntag SE, continues to work towards compliance of the German Supply Chain Due Diligence Act (SCDDA) which came into force on 1 January 2023. The SCDDA serves to implement the United Nations Guiding Principles on Business and Human Rights, requiring in-scope companies to identify and assess risks to human rights and the environment within their supply chains, and establish effective risk management systems. The new act seeks to eliminate child and forced labour from global commerce and improve working conditions for all those in a supply chain. Under the terms of the Act, Brenntag is not required to comply until 1 January 2024, as it is a company with less than 3000 employees; however alignment with corporate compliance teams is in progress to ensure compliance with both Acts is consistent across the group of companies.

Multisol's Supply Chain team, with collaboration from the Quality and Compliance team, will begin a programme of third-party audits to assess their policies and processes to ensure alignment of the same or similar value held by Multisol. This will include direct scrutiny of MSA compliance. The auditors are due to begin with third party hauliers and the scope will be widened during successive years to ensure compliance with external partners.

Multisol has re-registered with the Modern Slavery statement registry service via the new GOV.UK One Login. This is the new way to sign into all central government services. It allows access to the Modern Slavery statement registry to submit annual statements. This is a direct collaboration with a framework for statutory guidance on reporting and to develop, improve and evaluate the quality of future statements. With the coming Modern Slavery Bill, Multisol's membership will ensure its continued compliance to coming changes in the legislation.

Signed on behalf of the Board of Directors and Executive Committee:

Multisol

A Brenntag Group Company

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Vavid Hopkinson —63A0B8287D6C4EF...

**David Hopkinson** 

**Chief Executive Officer** 

Signed: June 2023 for financial year 2022 (1 January 2022 to 31 December 2022) for Multisol Ltd, its subsidiaries and affiliates.

Further endorsed by:

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karen Frith

Karen Frith HR Manager DocuSigned by:

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Lucy Bentley

**Quality and Compliance Manager**