



Group Policy : Synthomer Modern Slavery Statement 2020

Structure, business and supply chain

Synthomer is an international speciality chemical company and one of the world's foremost suppliers of water-based polymers. Our polymers help our customers create new products and enhance the performance of existing products in key industries such as coatings, construction, textiles, paper and synthetic latex gloves.

With the acquisition of Omnova Solutions in 2020, Synthomer grew its global manufacturing network, expanded its product portfolio and geographical presence. Synthomer has its global headquarters in London, UK, and provides customer focused technical services from regional centres in Harlow, UK; Marl, Germany; Kluang, Malaysia and Beachwood, Ohio, USA.

As at year end, Synthomer operates through 38 sites across 24 countries globally, and we employ over 4,500 people in highly skilled manufacturing, value added innovation and technical support to meet the needs of our customers and society in a sustainable way

We recognise that Synthomer has a number of operations and customers in areas which may be at risk for human rights issues. In response to this, Synthomer continues to strengthen its compliance and sustainable procurement framework to ensure that there is no slavery or human trafficking in its supply chain.

Our Vision and Values

Synthomer has a set of new Core Values and Behaviours that describe what we aspire to as a company and what is expected of our employees and stakeholders. We have revised and embedded these during 2020 within our business to become 'our guiding compass':

Synthomer Core Values are:

- SHE "We always have time to work safely"
- Accountability "We deliver our promises"
- Innovation "We welcome change & new ideas"
- Integrity "We act with integrity & show respect"
- Teamwork "We are stronger as ONE team"

We consider these to be at the centre of how we operate and to directly support our sustainability aims and objectives.

Synthomer's approach

Synthomer has a commitment to act ethically and responsibly in all its business relationships and recognises the risk and has zero tolerance of slavery and human trafficking in any part of its business or supply chain. Synthomer supports and is committed to the UN sustainable development goals, UNSDGs and recognise human rights as encompassed in SDG 8: Decent Work and Economic Growth to Promote inclusive and sustainable economic growth, employment and decent work for all.

Synthomer has a wide range of internal policies, standards and processes in place groupwide to assist in tackling slavery and human trafficking, including:

1. Code of Conduct - applicable across all of our business, including our suppliers, with standards regarding human rights, working conditions, environmental protection and ethical business practices that Synthomer requires its suppliers to meet;
2. Onboarding and qualification processes of new suppliers before Synthomer engages in business with them;
3. General Purchasing Conditions for suppliers to secure compliance with the Code of Conduct;
4. Sustainable Procurement Policy and Strategy
5. Supplier risk assessment
6. Onboarding checks for employees
7. Whistleblowing hotline to enable employees and all stakeholders to report possible violations of the law or of company guidelines or policies.

For further Information about Synthomer's responsible business practices please refer to Synthomer's Sustainability Report.

Summary of Achievements in 2020

During 2020 we have strengthened our governance policies and processes across our business

With the acquisition of Omnova and the new Core Values for the enlarged Group, Synthomer continued to deliver its Code of Conduct awareness and compliance training to target new employees. In 2020 a global e-learning system was put in place to ensure ongoing compliance training for targeted employees and, going forward, will provide the platform for all employees to complete yearly Code of Conduct training. This is to be supplemented with face-to-face training sessions as well as audit checks on sites to ensure understanding of the Code and that every employee is aware of the Ethics Helpline available to them to report any breaches.

Synthomer has continued to strengthen its organisation with the appointment of dedicated roles to support the sustainability work of the company, such as the Director of Procurement Excellence, the Group Sustainability Director and further defined roles and responsibilities of the Sustainability Committee. Synthomer has also appointed a Group Internal Audit and Risk Director, reporting to the CFO to strengthen and improve the risk governance processes and further appointed a Risk and Business Continuity Manager to manage the risks specifically for our Asia region.

Synthomer has also strengthened its procurement functional excellence team with increased resources to drive supply chain assurance. The team has published Synthomer's Sustainable Procurement Policy with clear targets and actions. This has been through collaboration with business stakeholders to lead risk assessments in this area and an investment in risk management tools.

Regionally, in Asia, Synthomer implemented the standardised supplier on-boarding and qualification process using a single platform as planned. The system, already in place in Europe, requires suppliers to provide Synthomer with a copy of their Modern Slavery Act Statement and agree to our Synthomer Code of Conduct or provide their own so that appropriate assessments on the potential risk of modern slavery in the supply chain can be made by Synthomer. We have also implemented an additional due-diligence process for a small number of our suppliers in China. This was done using specialist advisors to design a process to further improve our risk governance. This will continue for a broader number of suppliers during 2021. For our construction project at our Pasir Gudang site in Malaysia, we had a significant sub-contracted workforce where we ensured that the welfare

conditions available on site were to a high standard that included specific measures and testing facilities to manage COVID 19.

Our external website was also improved during 2020 with additional support and resources available for our existing and potential new suppliers on our sourcing tools and systems.

Plans for 2021

For 2021, Synthomer will continue to review and strengthen its risk governance processes to include broader material sustainability risks including human rights and modern slavery facilitated by external experts to provide the necessary insight.

This will include the adoption of a recognised sustainability ratings for both suppliers and customers and the implementation of our supplier on-boarding and qualification process into our single platform for the US.

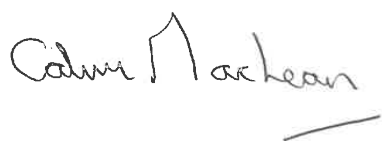
Code of Conduct training will continue to be rolled out to legacy Omnova employees and face-to-face training will recommence as soon as possible, backed up by the roll out of new e-learning courses.

All our new suppliers for China will have to go through the due-diligence process designed by our advisors as described above, with a view to review the effectiveness of this to inform our future processes and risk management for the broader group.

Synthomer's continued commitment

Synthomer will continue to review its policies and processes in relation to the prevention of slavery and human trafficking in its business and supply chain, strengthening these where necessary.

This statement has been approved by the Synthomer plc Board of Directors on 29 April 2021.



Calum MacLean

Chief Executive Officer – Synthomer plc

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Synthomer Group's slavery and human trafficking statement for the financial year ended 31 December 2019 for the following entities: Synthomer Deutschland GmbH, Synthomer SDN BHD, Synthomer Trading Limited, Synthomer AS, Synthomer SRL, Synthomer UK Limited, Revertex Malaysia SDN BHD, Synthomer Finland OY, Synthomer BV, Synthomer USA LLC, Synthomer Austria GmbH, Synthomer Specialty Resins SRL