



## **Group Policy: Synthomer Modern Slavery Statement 2017**

### **Our business**

Synthomer is one of the world's major suppliers of aqueous polymers with leadership positions in many markets including coatings, construction, textiles, paper and synthetic latex gloves. With the acquisition in 2017 of the Speciality Additives business, Synthomer continues to grow its global manufacturing network and introduce new products, geographical strength and capacity to support future growth.

Synthomer has its operational headquarters in London, UK, and provides customers focused services from regional innovation centres in Harlow, UK; Marl, Germany; Kluang, Malaysia; and Roebuck, USA.

### **Corporate Responsibility and our Policies**

Synthomer is committed to approaching its business in an ethical and environmentally sound manner and has been committed to the International Council of Chemical Associations' (ICCA) Responsible Care project since the early 1990s.

Our work in this area has been highlighted through the Group's inclusion in the FTSE4Good Index since 2004.

The FTSE4Good index is operated by FTSE and highlights the performance of stock market listed companies against a range of environmental, social and governance criteria. To be eligible for inclusion in the index companies must demonstrate a high level of commitment in areas such as climate change, environmental management and human rights.

Our global code of conduct is governed by a wide range of policies which we adopt to ensure our daily business is conducted in a professional and responsible manner. These policies play a key role in maintaining our reputation with our internal and external stakeholders. They also set out the standards to which we hold ourselves, our employees and our business partners.

Our Equal Rights, Diversity and Human Rights policy includes our responsibility to follow all applicable laws and regulations as well as a complete prohibition of forced, compulsory and child labour.

### **Due diligence process**

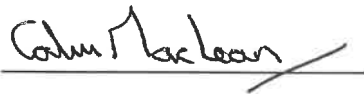
In 2017 Synthomer conducted a detailed review of its vendor and supplier on-boarding due diligence process and assessed the two processes working separately across the business. It was recognised that having two processes could lead to missing critical information about new vendors and suppliers. It was identified that bringing these two processes together would lead to a better on-boarding process where Synthomer would be able to more clearly secure information about compliance and identify the presence of modern slavery in new vendors and suppliers. Further, a review of our current global policies and code of conduct concluded that Synthomer would need to

improve its policies to properly address its zero tolerance approach to modern slavery and ensure that all of its business partners were aware of and abide by Synthomer's code of conduct.

**Our next steps**

As a result of the reviews conducted in 2017, Synthomer has committed to and has begun the process of implementing an advanced sourcing tool that will streamline and unify its on-boarding processes. In addition to this, Synthomer is actively seeking to build in a component that will identify modern slavery within the new sourcing tool. Synthomer is also considering bringing in tougher vendor reviews and the introduction of guarantees of compliance from new vendors and suppliers in high risk areas. Further to this, Synthomer will be releasing its new code of conduct in 2018 and will actively be promoting this to its employees and business partners.

This statement was approved by the Board of Synthomer plc on 26 April 2018.



**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 Group's slavery and human trafficking statement for the financial year ended 31 December 2017 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