



Group Policy : Synthomer Modern Slavery Statement 2019

Company introduction

Synthomer is one of the world's foremost suppliers of aqueous polymers and has leadership positions in many markets. Our polymers help 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 will grow its global manufacturing network, expand its product portfolio and boost its geographical presence. The information below is provided as at 31st December 2019 and therefore does not take into account the acquisition of Omnova on 1st April 2020.

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

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 Russell 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.

This statement sets out the steps the Synthomer Group ("Synthomer") has taken during 2019 to manage the potential risk that slavery and human trafficking is taking place in any of its operations and supply chains under the following risk headings.

Supply chain transparency

During 2019, there was continued progress on the implementation of a standardised supplier onboarding and qualification process using a single platform. The system is in place in Europe and the deployment in Asia remains to be completed with the target for this to be done by the end of 2020. The system 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. The single platform will also prepare the foundation for more sophisticated system-based tools in the future to improve our supply chain data management and transparency.

Progress is also being made on standardising and improving the transparency of our sourcing processes where potential suppliers are required to undertake a pre-qualification process and the inclusion of broader selection criteria aligned to Synthomer Sustainability goals.

Our purchasing standard terms and conditions are close to being fully revised and available on our internet site and include a clear obligation on our suppliers to support and comply with the Modern Slavery Act.

The procurement team is also being restructured to provide more resource and focus on supplier risk management through the creation of dedicated roles in a Procurement Excellence function.

Engagement with suppliers

In our previous annual statement, we made the commitment to undertake at least one full supplier audit per year per buying team using an improved audit questionnaire including visits to the supplier sites. During 2019, this was achieved with seven audits completed across the teams. It has been recognised that we need to make our supplier selection approach more aligned to potential risk and Synthomer's Sustainability goals and this will be developed during 2020. In the meantime, we recognise that our Asia markets are potentially the highest risk and have therefore already required our supply base to agree to our Business Code of Conduct in that region. There is the target of all our suppliers covering 85% of the spend.

Our external website will be improved during 2020 with further support available for our existing and potential new suppliers on our sourcing tools and systems. We will also make our audit requirements freely available for our stakeholders.

Engagement with workers

Synthomer has a Global Code of Conduct (the "Code") available in thirteen languages to ensure that it is accessible by all our employees and stakeholders. The Code integrates many of our policies into one, easy to read handbook which everyone can use to ensure our daily business is conducted in a professional and responsible manner. The Code plays an important role in maintaining our reputation with our internal and external stakeholders. It also sets out the standards to which we hold ourselves, our employees and our business partners accountable.

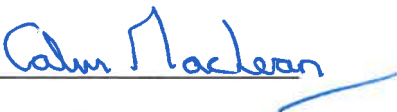
Our Diversity, Human Rights and Equal Opportunity policy in the Code includes our responsibility to follow all applicable laws and regulations as well as a complete prohibition of forced, compulsory and child labour. In this policy there is also a link to our Modern Slavery Statement so that everyone can always easily access Synthomer's most recent Statement.

Employees receive regular refresher training with particular emphasis on the procurement teams and is also part of our new employee on-boarding processes.

Access to remedy

Synthomer has, within its Global Code of Conduct, publicly available information on how to access the Group Legal team that is also supported by a fully independent Ethics Helpline available for all employees and stakeholders. In 2020 a global e-learning system will be put in place to ensure that all employees will complete yearly Code of Conduct training. This will be supplemented with face to face training session as well as random 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.

This statement was approved by the Board of Synthomer plc on 12 June 2020.

A handwritten signature in blue ink that reads "Calum MacLean". The signature is written in a cursive style and is positioned above a horizontal line.

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