



Group Policy: Protecting our Reputation

The reputation of Synthomer and the trust and confidence of those with whom it deals – shareholders, employees, suppliers, competitors and the wider community – is one of our most important resources.

Having endorsed a set of core principles to be followed by all employees in connection with the business activities of the group (see the Synthomer Code of Business Conduct on Corruption and Anti-Competitive Activities) the Board of Directors wishes to maintain an open culture. To this end the following sets out a procedure whereby employees are able to raise freely and in confidence, genuine concerns they may have about suspected malpractice within the group.

- ▶ **Application** - the following procedure applies to all full and part-time employees (whether permanent or temporary), self-employed contractors and agency staff and covers "malpractice" which includes but is not confined to:
 - ▶ a criminal offence
 - ▶ a danger to the safety or health of any person
 - ▶ a breach of civil law
 - ▶ damage to the environmentand any deliberate covering up of information tending to show any of the above.

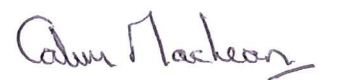
- ▶ **Raising a malpractice concern** - where any person covered by this procedure reasonably believes that malpractice has been, is being or is likely to be committed and is acting in good faith they should inform the managing director of their company or the divisional chief executive for the division of which their company forms part. If the concern involves the managing director or divisional chief executive or for any reason it is inappropriate for them to be told of it or it arises at head office, the concern should be raised with the Chief Executive Officer, Chief Financial Officer or Chief Counsel & Company Secretary (+44 (0) 1279 436211). If it is felt the concern cannot be raised internally then the Senior Independent Director of the Board (whose contact details can be obtained from the Chief Counsel & Company Secretary) will act for the Board in this matter.

- ▶ **Feedback** - the findings of the investigation undertaken in connection with the malpractice concern will be communicated to the person who raised that concern, as will, where possible, any action that is propose. If there is a concern about the response or lack of response the matter should be raised with the Chief Executive Officer, Chief Financial Officer or Chief Counsel & Company Secretary. Again, if it is felt that the matter has not been dealt with correctly internally, the issue should be raised with the Senior Independent Director of the Board.

- ▶ **Legal** - Legislation in a number of countries (e.g. in the UK under The Public Interest Disclosure Act 1998) provides legal protection against victimisation or dismissal to workers who report malpractice by their employers. Synthomer will afford the same protection to employees where this legislation does not currently exist. However if it is found that an employee has deliberately raised false and malicious allegations, disciplinary action will be taken.



Neil Johnson
Chairman
Synthomer plc
January 2015



Calum MacLean
Chief Executive Officer
Synthomer plc
January 2015