



## Group Policy: **Whistleblowing**

At Synthomer we are committed to maintaining a safe, respectful and ethical workplace. This policy encourages employees and stakeholders to report concerns about wrongdoing without fear of retaliation and outlines how such concerns are handled.

Whistleblowing is the act of reporting suspected wrongdoing or risks that could harm individual, the Company, or the public. This includes breaches of laws, regulations, or company policies.

- ▶ You can report concerns to your line manager or supervisor, directly to HR, through the whistleblowing (EthicsPoint) portal [EthicsPoint - Synthomer](#)\* or to the following email address: [ethicspoint@synthomer.com](mailto:ethicspoint@synthomer.com). Reports can be made anonymously. This portal and email address is also available to external parties (e.g. suppliers, contractors) to raise concerns in confidence.
- ▶ If you suspect something isn't right, you should report a concern. This may include:
  - Breaches of our Code of Conduct or other company policies
  - Discrimination, harassment or bullying
  - Fraud, bribery or financial misconduct
  - Criminal activity or unethical behaviour
  - Health, safety or environmental violations
- ▶ All reports are reviewed by the Compliance team, following the published [EthicsPoint process](#). Should an investigation be necessary, we have an established an Investigation Protocol detailing how investigations should be conducted and who should conduct them.
- ▶ We treat all reports seriously and confidentially and investigations are conducted discreetly and thoroughly, and outcomes and actions are communicated where appropriate.
- ▶ We have a zero-tolerance approach for retaliation towards anyone raising a concern in good faith or helping with an investigation. Any retaliation against whistleblowers could result in disciplinary action. This is covered in our published [Non-Retaliation Policy](#).

The Synthomer plc Audit Committee, on behalf of the Board, oversees the whistleblowing programme through regular reports of the volume and type of cases, the outcomes of cases, and the activities to ensure awareness of the EthicsPoint portal/ line both internally and externally.

A handwritten signature in dark ink, appearing to read "Peter Hill".

**Peter Hill**  
**Chair**  
Synthomer plc  
November 2025

A handwritten signature in dark ink, appearing to read "M. Willome".

**Michael Willome**  
**Chief Executive Officer**  
Synthomer plc  
November 2025

*\*The EthicsPoint portal is hosted by NAVEX, an independent global provider of whistleblowing services*