



## Group Policy: Non-Retaliation

At Synthomer we are committed to maintaining a work environment that is free of harassment, intimidation and discrimination and to ensuring that everyone feels safe and able to speak up.

Synthomer strictly prohibits and does not tolerate retaliation against any member of the Synthomer workforce who in good faith:

- ▶ make reports relating to violations of laws, or
- ▶ make reports relating to violations of the Synthomer Code of Conduct or other Group policies, or
- ▶ participate in an investigation connected with reports relating to the above violations, or
- ▶ refuse to participate in suspected improper or wrongful activity, or
- ▶ exercise workplace rights protected by law

(each a “**Protected Activity**”)

Retaliation occurs when there is Adverse Action against a member of the Synthomer workforce because they engaged in a Protected Activity. Adverse Action includes, but is not limited to:

- ▶ Victimization (i.e. being treated badly or subjected to detriment);
- ▶ Demotion;
- ▶ Discipline or reprisal;
- ▶ Unfounded suspension or termination;
- ▶ Unfounded poor work performance evaluations;
- ▶ Failing to hire or consider for hire or promotion;
- ▶ Adversely impacting working conditions;
- ▶ Harassment (i.e. creating a hostile or intimidating work environment).

If you are subject to any conduct that you believe violates this policy, you must promptly speak to, write to, or otherwise contact your line manager. If the conduct involves your line manager or if you don't feel comfortable discussing the matter with your line manager for whatever reason, you may contact a member of Group Legal & Compliance or Human Resources. Synthomer will take all reasonable precautions to maintain the confidentiality and information regarding any report, but we appreciate that raising the matter internally may not always be possible and therefore employees also have the choice to report concerns anonymously through EthicsPoint. Details of Synthomer's process for seeking guidance and speaking up can be found on page 5 of our Code of Conduct available [here](#).

Synthomer takes all claims of retaliation very seriously. Reports will be reviewed promptly and will be investigated thoroughly where appropriate in accordance with Synthomer's Investigations Protocol.

Any employee, regardless of position or title, who engages in retaliation in violation of this policy, will be subject to disciplinary action, up to and including termination of employment.

Disciplinary action may also apply to employees who knowingly make false allegations, provide false or misleading information in the course of an investigation, or otherwise act in bad faith.

A handwritten signature in blue ink that reads "M. Willome".

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