



Group Policy: Anti-Bribery and Corruption

Synthomer has a zero-tolerance approach to bribery or corruption in any form, and we are committed to conducting all business dealings with the highest level of integrity and transparency.

We define bribery as the offering, giving, receiving, or soliciting of something of value as a means of influencing the actions of an individual or organisation, and we define corruption as the abuse of power or position for personal gain.

Any breach of this policy by any person who works for us, or on our behalf, could result in actions taken against them, including disciplinary proceedings and termination of employment. Any breach may also lead to fines and/or imprisonment for the individual, and to serious damage to Synthomer's reputation.

Our anti-bribery and corruption principles:

- ▶ Our people will always act in accordance with the Synthomer Code of Conduct.
- ▶ Our senior management team demonstrates strong ethical leadership, setting high standards of integrity for themselves and their teams. They role model their commitment to ethics.
- ▶ Synthomer will comply with all applicable laws, regulations, and guidelines governing government interactions, including those set out in the UK Bribery Act 2010, the United States Foreign Corrupt Practices Act (FCPA), and in the Malaysian Anti-Corruption Commission (MACC) Act 2009.
- ▶ Our people, and anyone who works on our behalf, are provided with appropriate information, training, coaching and supervision to enhance their awareness of, and prevent, bribery and corruption.
- ▶ Synthomer strictly prohibits accepting, seeking, offering, promising, or providing any form of improper advantage, bribe, or inducement to government officials that could compromise their independence or impartiality.
- ▶ Changes in bribery and corruption risks (associated with our business) are identified and reviewed on an ongoing basis, and controls to manage those risks are kept under regular review.
- ▶ Internal controls and monitoring mechanisms are established to assess compliance with this Policy and relevant laws and regulations.

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

Peter Hill
Chair
Synthomer plc
March 2025

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

Michael Willome
Chief Executive Officer
Synthomer plc
March 2025