



Synthomer Non Retaliation Policy

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 employees who:

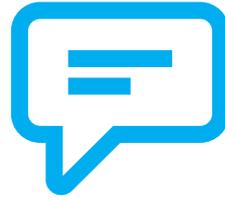
- make reports relating to violations of laws, the Synthomer Code of Conduct, or Synthomer's other policies or procedures, or
- participate in an investigation connected with reports relating to the above violations, or
- refuse to participate in suspected improper or wrongful activity, or
- exercise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

(each, a “Protected Activity”).



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Any Synthomer employee who engages in a Protected Activity will be shielded from retaliation. Retaliation occurs when an employer or employee takes an Adverse Action against an employee because the employee engaged in a Protected Activity. Adverse Action includes, but is not limited to:

- Victimization (i.e. being treated badly or subjected to detriment);
- Demotion;
- Unfounded suspension or termination;
- Unfounded poor work performance evaluations;
- Failing to hire or consider for hire or promotion;
- Adversely impacting working conditions;
- 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 or Human Resources. Reports of violations of this policy will be treated confidentially, 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 the Ethics Helpline. 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 and 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.



M. Willome

Michael Willome
Chief Executive Officer
November 2021

