

Modern Slavery Statement

for the year ended 31 December 2025

Introduction

Synthomer is committed to the highest ethical standards and sustainable business practices. Our high standards include an absolute commitment to respecting and protecting human rights across our Group operations and supply chain and we recognise that this is an ongoing challenge. We continue to build on our actions to strengthen and improve our processes, practices and policies and actively work to identify, raise awareness of, and prevent modern slavery and human trafficking.

Michael Willome, Chief Executive Officer

“Modern slavery is a crime and a violation of fundamental human rights, and has no place at Synthomer.”

Peter Hill, Chair

Synthomer – our structure, business, and supply chain

We are on a strategic journey which aims to focus Synthomer on becoming a speciality chemical business. As a more focused, stronger speciality chemicals business, we will be better able to fulfil our purpose: creating innovative and sustainable solutions for the benefit of customers and society.

Sustainability is one of the critical enablers of our strategy, and our Vision 2030 roadmap sets out how we are delivering on our commitments on environmental, social and governance (ESG) issues. Our EcoVadis Silver rating recognises our commitment to sustainability and puts us into the top 15% of companies. Our approach to sustainability is informed by the issues that matter most to our stakeholders and our participation in industry associations (see pages 27 to 31 of our Annual Report). We obtain independent assurance for our ISO management systems and our Scope 1, 2 and 3 greenhouse gas emissions, this helps us benchmark our sustainability practices and highlight opportunities to improve.

Our global headquarters are in London, UK, and, as of the end of 2025, we operated 29 manufacturing sites, five innovation centres of excellence, and seven technology centres. We have no operations in, or sales into, Russia, Belarus or any comprehensively sanctioned country.

We serve over 6,000 customers world-wide in around a dozen end markets including Coatings, Construction, Adhesives and Health and Protection.

We employ approx. 3,800 people in highly skilled manufacturing, innovation, and technical support roles to meet the needs of our customers and our stakeholders in a sustainable way.

Our supply chain comprises a diverse range of over 6,000 suppliers and we spent over £1.3 billion with suppliers in 2025 on raw materials, goods, and services. Our primary supply chain geographies are Europe, North America, and Southeast Asia. Approximately 75% of our procurement (major raw materials) is managed centrally and the remainder is managed locally by our sites. The major materials we purchase include petrochemical monomers (styrene, butadiene, butyl acrylate and acrylonitrile), alongside packaging, machinery parts, gas and electricity to run our plants.

We recognise that Synthomer's global operations and geographical presence may lead to a risk of human rights abuses in its supply chain. In response to this, Synthomer continues to strengthen its compliance and sustainable procurement framework to ensure that there is no slavery or human trafficking in its supply chain and operations.

Our numbers:

29

Manufacturing sites

12

Principal end markets

6,000+

Customers world-wide

3,800+

Highly skilled employees

6,000+

Diverse range of suppliers

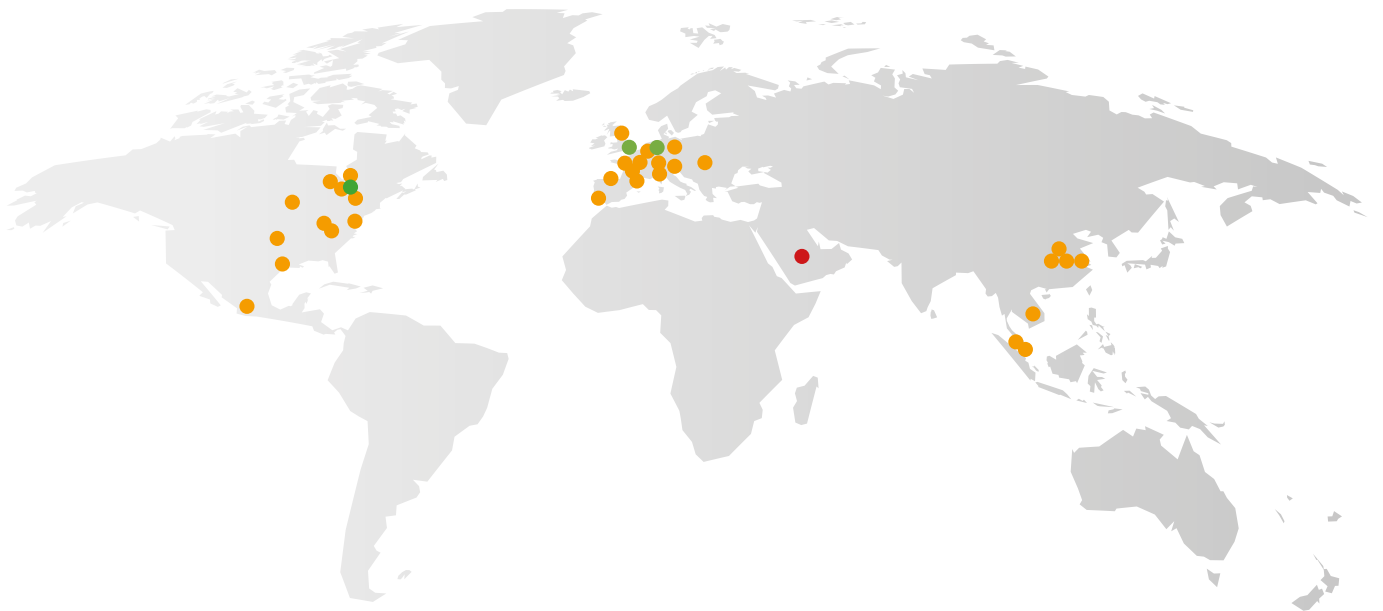
£1.3bn

Spent on raw materials



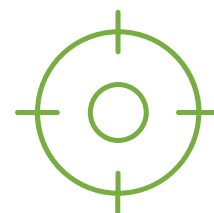
Modern Slavery Risk

This map lists out our manufacturing and technical locations, and clarifies which of those locations presents a higher modern slavery risk.



Facility	Country	Risk Level
Dammam	Saudi Arabia	High
Kluang	Malaysia	Medium
Pasir Gudang	Malaysia	Medium
Uruapan	Mexico	Medium
Asia Innovation Centre	Malaysia	Medium
China Innovation Centre	China	Medium
Caojing	China	Medium
Vietnam	Viet Nam	Medium
Filago	Italy	Medium
Akron	United States of America	Medium
Asua	Spain	Medium
Chester	United States of America	Medium
Gent	Belgium	Medium
Harlow	United Kingdom	Medium
Jefferson Hills	United States of America	Medium
Langelsheim	Germany	Medium
Le Havre	France	Medium
Marl	Germany	Medium
Middleburg	Netherlands	Medium
Mogadore	United States of America	Medium
Mogadore Pilot Plant	United States of America	Medium
Pischelsdorf	Austria	Medium
Ribecourt	France	Medium
Roebuck	United States of America	Medium
Sant' Albano	Italy	Medium
Sintra	Portugal	Medium
Sokolov	Czechia	Medium
Stallingborough	United Kingdom	Medium
Worms	Germany	Medium
Akron Technical Centre	United States of America	Low
Marl Technical Centre	Germany	Low
Harlow Technical Centre	United Kingdom	Low

Source data: Synthomer risk assessment, takes into account external data (The 2023 Global Slavery Index from Walk Free [Global Slavery Index | Walk Free](#) and The 2025 Freedom House ratings [Countries and Territories | Freedom House](#)), resource mix and supplier risk scoring.



Our approach to combating Modern Slavery

Synthomer supports and is committed to the UN Sustainable Development Goals ('UN SDGs') and recognises human rights as encompassed in SDG 8: Decent Work and Economic Growth to Promote inclusive and sustainable economic growth, employment, and decent work for all. We respect and recognise human rights for all as described by the Universal Declaration of Human Rights and are committed to the UN Guiding Principles on Business and Human Rights (UNGPs). Global statistics shows women are disproportionately at risk of becoming victims of forced labour – we expect our suppliers to be alert to this, and we expect them to comply with all domestic employment legislation. We also require a commitment from them to respect all human rights and follow the International Labour Organization (ILO) conventions and protocols, and the Universal Declaration of Human Rights.

The Group takes a global approach to raising awareness of modern slavery, forced labour, child labour and human trafficking, identifying and addressing potential instances of abuse. Our policies and practices have been developed to support our commitment to combating modern slavery, such that no person in our business or supply chain is at risk of exploitation; they act as a starting point for relationships we build and expectations we have of our people and our partners. These policies, such as our Code of Conduct and Supplier Code of Conduct, help us by providing practical guidance to make the right decisions and choices as we perform our daily work at Synthomer.

In 2025, we published our Human Rights policy available [here](#), that supports our Code of Conduct available [here](#) with dedicated guidance to identify, and commit to our prevention of modern slavery and human rights abuse.

Our Values and Behaviours

Synthomer's [Core Values and Behaviours](#) set out our aspirations and what is expected of our employees and wider stakeholders. Our Core Values are:



- SHE** We always have time to work safely
- Accountability** We deliver on our promises
- Integrity** We act with integrity and show respect
- Teamwork** We are stronger as one team
- Innovation** We welcome change & new ideas

We consider these values to be integral to how we operate and to directly support our sustainability aims and objectives. In relation to slavery and human trafficking specifically, our values of SHE, Accountability and Integrity are cornerstones of promoting respect for all our employees, for all individuals in the communities in which we operate and for anyone who is affected by our business – we hold everyone in our business accountable for their own and others' behaviour.

Policies, standards, and processes

Synthomer has a wide range of internal policies, standards, and processes in place across the Group to assist in tackling slavery and human trafficking, including:

- Code of Conduct** – Our Code of Conduct provides guidance to our workforce and helps us all make ethical decisions, protect our reputation, and uphold our values. It applies to all employees and anyone who works with or on behalf of us. In 2024 we revised our Code of Conduct and included a standalone section on Human Rights. Our Code of Conduct states the expectations of our employees and business partners and is set out to raise awareness and prevent Modern Slavery within our business. We regularly track awareness and understanding of the Code in our employee surveys and monitor our Code of Conduct training completion - 97% of our employees completing the course in 2025. Employees are required to declare their acceptance to the Code of Conduct through our eLearning management system. Code of Conduct Roadshows were performed across several key sites in 2025 to raise awareness of our expected behaviours and to highlight key areas including Human Rights.
- Employee awareness** – in addition to our Code of Conduct training and roadshows, a dedicated Modern Slavery eLearning was also delivered to those at highest risk of exposure to human rights abuses and modern slavery. It was completed by 100% of employees assigned to this eLearning, further raising the awareness across our business. To support our employees further, we have a dedicated Modern Slavery resource page on our intranet. We continue to ensure all employees are made aware of modern slavery risks and know of the risk factors to look out for.
- Human Rights Policy** – Our Policy sets out our principles and approach to human rights. Our clear message within our policy is “We will not tolerate, or condone, abuse of human rights and we will take seriously any allegations of human rights abuses. As part of our commitment, we do not tolerate threats or intimidation of anyone disclosing human rights issues or defending human rights”. Our dedicated Modern Slavery eLearning references and helps to enforce this policy.
- Supplier Code of Conduct** – Our Supplier Code of Conduct is applicable across the Group, with established standards on human rights, working conditions, environmental protection and ethical business practices that Synthomer requires its suppliers to meet. Along with our Responsible Procurement Policy, this is an important aspect of our supplier due diligence processes, and also includes:
 - Qualification and onboarding processes that are risk-based for new suppliers before Synthomer engages in business. This is a risk-based approach using low/medium/high risk criteria and questionnaires to ensure adequate due-diligence is conducted prior to onboarding;
 - Inclusion of General Purchasing Conditions for suppliers;
 - Conducting supplier risk assessments; each year our group-wide supplier base is screened using four different risk lenses. These include, spend, sustainability risk, business risk and human rights risk. We use the proprietary software tool, EcoVadis IQ, that allows us to identify and focus on our highest risk suppliers.
- Onboarding new employees** – We also require employees to commit to adhering to our Code of Conduct as part of their onboarding training and conflict of interest declarations during the onboarding phase.

Training:

97%

of all global employees completed Code of Conduct training

100%

of employees completed Modern Slavery training*

*those employees assigned the training

- Whistleblowing hotline** – EthicsPoint – An independent multi-lingual reporting channel, that allows employees and all stakeholders to raise any concerns or violations of our Code of Conduct, including any potential concerns relating to Modern Slavery. It is communicated internally through posters at all sites (in local language/s) and our intranet site. This is supported by our Non-Retaliation Policy which is published on our website, available [here](#). We have made our EthicsPoint system available to all suppliers and external parties via our website to report any concerns anonymously. Our Supplier Code of Conduct also mandates that suppliers must have a grievance process in place to enable anonymous reporting of unethical behaviour and suppliers are also able to raise concerns via EthicsPoint. A FAQ guidance document in support of our non-retaliation policy is available on our website to increase transparency in the reporting process. Our Investigations Protocol includes a process to ensure all reports made are reviewed and investigated independently, with actions taken (or action plans agreed) if risks, or instances of modern slavery are identified.
- Due Diligence of third parties** – We aim to work and partner with third parties who have the same ethical standards as ours. Due diligence activities are conducted on all material and higher risk suppliers (based on location or type of business), and we request those suppliers to positively commit to our Supplier Code of Conduct. We have a dedicated third-party risk management platform to manage the onboarding, due diligence, and in-life monitoring of our Agents and Distributors. We also run a weekly screening process on all third parties to identify any new sanctions, trade restrictions or significant adverse media. Our due diligence process continues to improve and provide assurance over the third parties with whom we engage and partner with.
- Conflict Minerals Policy Statement** – Our statement commits us to avoiding the use of conflict minerals in all our activities. We recognise that 3TG minerals (gold, tin, tantalum, and tungsten) may be mined in parts of the world where armed conflict and human rights abuses are known to take place.

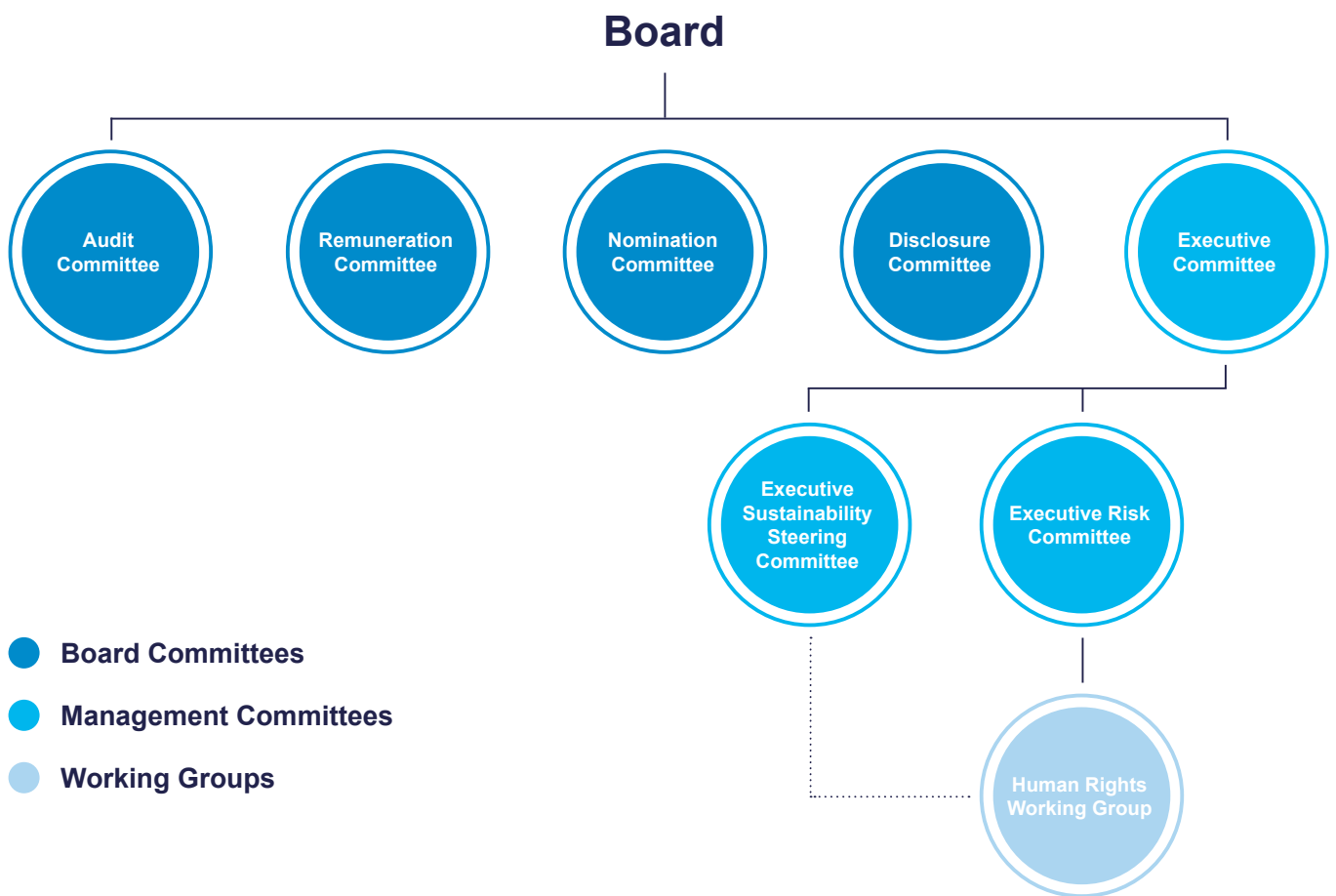
Our Conflict Minerals Policy Statement was reviewed and updated during 2024 and outlines our expectations of our suppliers in this regard, including a requirement for them to conduct their own due diligence to verify the origin of their materials, and provide certification under recognised initiatives. Read our full Conflict Minerals Policy Statement on our website [here](#).

- SHE** – Safety, Health and Environment – SHE is at the heart of our Core Values. We have a Global SHE Management System with clear expectations for worker safety, accident prevention, and safe working conditions for employees and anyone contracted to work on our facilities. Safe workplaces reduce the risk of injury, illness, and fatal accidents which directly supports core human rights such as the right to life, the right to personal security and the right to protection from harm. Global SHE Principles are deployed across all of our manufacturing sites, laboratories and offices translated into local languages. The first two SHE Principles are “Look After Yourself” and “Look After Each Other”.
- Wellbeing** - We recognise the right to the highest attainable standard of physical and mental health with our global Wellbeing Strategy covering physical, emotional, financial and social wellbeing. Our global Wellbeing Committee is our practical planning and governance mechanism to deploy that strategy in the workplace, designing and delivering global wellbeing initiatives. Underlying the strategy is an independent global Employee Assistance Programme (EAP); a free, confidential support service for employees and their families.

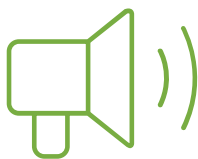
For further Information about Synthomer’s responsible business practices, please refer to Synthomer’s 2025 Annual Report and the [Group Policies](#) available on our website.

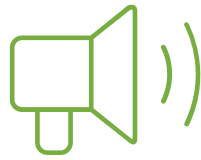


Governance



https://www.synthomer.com/media/abwot0vb/synt_ar23_full_interactive_report.pdf





Identifying and mitigating risks of Modern Slavery and human trafficking, our work in 2025 and plans for the future

Synthomer's Human Rights Working Group ("HRWG") is central to the governance of our Modern Slavery programme, with an agreed remit to develop and oversee initiatives to mitigate Modern Slavery risks across our business. The key priorities for the HRWG in 2025 were:

1. Providing oversight over Modern Slavery eLearning, including content, audience and frequency
2. Developing the Modern Slavery Risk Assessment. This was put together in 2025 based on external data (including the Modern Slavery Risk Heat Map above) and internal data, such as supplier data analysis, audits that have taken place at our sites and training statistics per site.
3. Reviewing due diligence and ongoing monitoring measures with respect to global chains of activity, both upstream and downstream including Company operations and subsidiaries, including relevant JVs with management control and partners
4. Setting (and monitoring against) a set of KPI's such as Modern Slavery eLearning completion statistics and supply chain verification statistics, site (and supplier) audits completed
5. Reviewing management actions identified in site or supplier audits related to human rights risks
6. Reviewing EthicsPoint cases related to any actual or potential issues/ breaches of human rights
7. Ensuring the dedicated intranet page related to Modern Slavery/ Human Rights contains clear and useful content to Synthomer employees

The HRWG includes representation from key stakeholders in the business (Group Legal, Group Compliance, Sustainability, Operations, HR, and Procurement) and is sponsored by the Group's General Counsel.

Each year, we identify through our supplier risk assessment process, several suppliers (Priority Suppliers) where we require them to positively commit to our Supplier Code of Conduct or provide evidence that they follow equivalent standards of behaviour and conduct. The targeted suppliers may change, and the number increases each year, for 2026 we are targeting 370 suppliers as we drive an increasing proportion of suppliers where we require sustainability credentials. The target KPI for 2025 was 90% of the targeted suppliers to sign up to our Supplier Code of Conduct (or equivalent) and we achieved 92%. We have set ambitious targets again for 2026.

- We are a member of the industry procurement peer group, 'Together for Sustainability' (TfS) whose purpose is to raise Corporate Social Responsibility (CSR) standards throughout the chemical industry and contribute to a more sustainable and responsible chemical industry.
- We continue to adopt the TfS methodology for site sustainability audits where we are able to access supplier audit reports and corrective actions undertaken by our peer member companies and also initiate site audits for our suppliers to contribute to this number. We set ourselves the target of eight supplier site audits for 2025 and this was achieved, targeting suppliers that had been selected by the HRWG (considering the region and sectors in which they operate). We are also targeting eight site supplier audits for 2026.

The HRWG agreed, in 2025, a tiered approach to Modern slavery training: Level 1 training, coverage within the Code of Conduct to all employees; Level 2 training, Modern Slavery eLearning to those at highest risk of exposure to human rights abuses; and Level 3 training, targeted training through webinars to sites where the inherent risk is elevated such as those in the Middle East and Asia.

Code of Conduct Roadshows were performed across several key sites in 2025 to raise awareness of our expected behaviours as employees of Synthomer. Sites covered included Dammam (Saudi Arabia), two sites in Malaysia and several European sites. The programme of roadshows started in late 2022 and will continue into 2026, continuing to emphasise our Code of Conduct and several significant compliance initiatives, including risks relating to Modern Slavery.

In 2025 we received no EthicsPoint cases related to any actual or potential issues/ breaches of human rights, however we continue to ensure that our employees (through training and awareness) and our third parties (through regular engagement and awareness of our own EthicsPoint line) know how to report a concern.

In order to drive continual improvement, we have completed an initial assessment of our modern slavery policies, standards and processes against BS25700. We will seek to revise and strengthen our approach where appropriate to fully align with this standard in 2026. We will also assess ourselves against the OECD Due Diligence Guidelines on Responsible Business Conduct.

As part of our broader governance commitments, our CEO has signed the Responsible Care® Guiding Principles, reinforcing our commitment to proactive leadership, protecting people, operating sustainably, managing chemicals safely, and engaging openly with employees and stakeholders. These principles support our approach to preventing modern slavery by reinforcing expectations around safe and secure working conditions, responsible management of contractors and raw material supply chains, transparent reporting, and meaningful worker engagement.

The Synthomer Board has overall responsibility for this statement and compliance with our legal and ethical obligations in relation to modern slavery. This statement is made in relation to section 54 (1) of The Modern Slavery Act 2015 for the financial year ended 31 December 2025 on behalf of the following entities: Synthomer plc, Synthomer (UK) Limited and Synthomer Trading Limited.

This statement was approved by the board on 09 March 2026 and signed by the CEO, Michael Willome.

Michael Willome
Chief Executive Officer – Synthomer plc



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