



# Conflict Minerals Policy Statement

Synthomer produces high-performance, highly specialised chemical products and solutions that bind the modern world together through a broad range of everyday applications. Synthomer is committed to ethical business practices and the responsible sourcing of minerals.

Conflict minerals are tungsten, tantalum, tin, and gold (3TG) that are mined in conflict-affected and high-risk areas [CAHRAs](#)<sup>1</sup>. These areas are defined under the [Responsible Minerals Initiative \(RMI\)](#)<sup>2</sup>. Minerals mined in these areas have a high risk of being associated with armed conflict and human rights' abuses.

After thorough analysis, we have identified that we only source tin that falls within the scope of conflict minerals legislation. Furthermore, we conduct due diligence based on the [Organization for Economic Cooperation and Development \(OECD\) guidance for Responsible Mineral Supply Chains](#)<sup>3</sup> to ensure that tin remains the only 3TG that we source. Synthomer's policy is to be free of conflict minerals in all our business activities.

## Our commitment:

- We support the aims and objectives of the [US](#)<sup>4</sup> and [EU](#)<sup>5</sup> legislation on the supply of conflict minerals.
- We do not procure specified metals that originate from facilities in conflict regions.
- We work closely with our suppliers to support our commitments and ensure compliance by:
  - Conduct appropriate due diligence and verifying the country of origin of the materials used in the products they supply to us.
  - Identifying smelters in their supply chain using the [Conflict Minerals Reporting Template \(CMRT\)](#)<sup>6</sup> and requesting to provide a report to Synthomer annually.
  - Support initiatives that determine whether smelters and refiners conform to [Responsible Minerals Assurance Process \(RMAP\) standards](#)<sup>7</sup>, and expecting them to utilise such conflict free smelter/refinery programs.

Suppliers' willingness to comply with this policy is a factor in our sourcing decisions. If Synthomer determines that a supplier has failed to develop and implement reasonable steps to comply with this policy, Synthomer reserves the right to take appropriate action, which may include discontinuing the business relationship with the supplier.

Smelters mix minerals from various sources and are key to enforcing responsible sourcing by exercising due diligence in their selection of mineral sources. The RMAP identifies smelters that can demonstrate, through independent third-party assessment that the minerals they procure do not originate from sources that contribute to conflict in CAHRAs. They refine them into metals used

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<sup>1</sup> [CAHRAs](#)

<sup>2</sup> [Responsible Minerals Initiative](#)

<sup>3</sup> [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas | OECD](#)

<sup>4</sup> [SEC.gov | Conflict Minerals](#)

<sup>5</sup> [Regulation - 2017/821 - EN - EUR-Lex](#)

<sup>6</sup> [Conflict Minerals Reporting Template](#)

<sup>7</sup> [Standards](#)

in our industry. Smelters play a key role in enforcing responsible sourcing by exercising due diligence in selecting their mineral sources.

Synthomer expects suppliers to steer their supply chain towards using only smelters validated via RMAP (or equivalent). A list of conflict-free validated smelters is available on the website of the Responsible Minerals Initiative (RMI). We request all suppliers using smelters that are not yet verified as conflict-free to encourage these smelters to participate in the RMI smelter audit program (or equivalent) or to switch to an already audited smelter.

Synthomer is dedicated to ensuring that our products do not contribute to conflict or human rights abuses. We expect our suppliers to share this commitment and to work with us to achieve a transparent and responsible supply chain.



**Peter Hill**  
**Chair of Synthomer**  
Synthomer plc  
February 2025



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