



Group Policy: Responsible Procurement

Synthomer produces high-performance, highly specialised chemical products and solutions that bind the modern world together through the broadest range of everyday applications.

Synthomer supports the [Paris Climate Agreement](#)¹, by having GHG emission reduction targets validated by the [Science Based Targets Initiative](#), the [UN Sustainable Development Goals](#)², the [Responsible Care® Guiding Principles](#)³ and [UN Declaration of Human Rights](#)⁴. These commitments are integral to our [Vision 2030 roadmap](#) and our strategy to lead in responsible procurement.

This Responsible Procurement Policy outlines our commitment to sustainable procurement practices that align with our [Vision 2030 roadmap](#)⁵ and support our [environmental, social, and governance \(ESG\) goals](#)⁶, while meeting the expectations of our internal and external stakeholders.

This policy applies to Synthomer and all its affiliated entities, including subsidiaries and associated companies.

The Chief Executive Officer, supported by the Executive Team, is ultimately responsible for implementing this policy.

We are committed to continuous improvement of our procurement practices across the entire value chain of our business. To achieve this, we focus on:

- ▶ Procure with integrity, transparently and systematically, complying with relevant rules, regulations, and laws as required by our [Code of Conduct](#)⁷
- ▶ As part of their onboarding, require our suppliers to adhere to the [Supplier Code of Conduct](#)⁸ or equivalent standards
- ▶ Develop robust processes for compliance with human rights legislation and to make sure that our purchased raw materials do not come from conflict-affected regions, as stated in our [Modern Slavery Act Statement](#)⁹ and [Conflict Minerals Policy Statement](#)¹⁰
- ▶ Use risk management processes and due-diligence tools to manage and promote responsible practices among our suppliers, considering social, economic, and environmental risks
- ▶ Have systems and controls in place to develop safe and high-quality products and to ensure the safe storage and delivery of all inbound and outbound raw materials and finished products.
- ▶ Employing scenario planning and hedging strategies to manage risks to ensure sustainable and consistent operations
- ▶ Developing key supplier partnerships and drive change to create more sustainable supply chains, in particular measuring and reducing our upstream GHG scope 3 emissions

¹ [The Paris Agreement | UNFCCC](#)

² [The 17 GOALS | Sustainable Development \(un.org\)](#)

³ [Responsible-care-guiding-principles-2021.pdf \(synthomer.com\)](#)

⁴ [Universal Declaration of Human Rights | OHCHR](#)

⁵ [Our commitments | Synthomer](#)

⁶ [Ratings and resources | Synthomer](#)

⁷ [Synthomer-code-of-conduct-en-april-2024.pdf](#)

⁸ [Supplier Code of Conduct | Synthomer](#)

⁹ [Syn_modern-slavery-report_june2023.pdf \(synthomer.com\)](#)

¹⁰ [Synthomer_conflict-minerals-policy_dec_2021.pdf](#)

- ▶ Improving traceability and visibility in the supply chain for example through the adoption of digital tools

To fulfil these commitments, we will:

- Comply** ▶ Work effectively with local regulators to ensure compliance with human – and ethical rights and environmental regulation
- Manage** ▶ Implement and continually improve Management Systems within procurement which sets standards aligned to our [Vision 2030 Roadmap](#)
 - ▶ Introduce robust corporate governance mechanisms and plans to identify, assess, and address risks and opportunities; including for Mergers, Acquisitions and Divestments
 - ▶ Use our systems to drive continuous improvement in performance through challenging plans and targets – as summarized in our [Vision 2030 roadmap](#) – ensure the availability of information and provide adequate resources to support their delivery
- Appoint** ▶ Formally appoint individuals with responsibility for implementation of this policy and improvement of performance
- Involve** ▶ Actively engage with our employees and suppliers to foster shared ownership for a responsible procurement policy and improvements of procurement policies
- Train** ▶ Provide training and learning resources to employees and suppliers, enabling them to contribute to the achievement of our [Vision 2030 Goals](#) and targets
- Expect** ▶ Expect a high level of personal commitment and behaviour from all those who manage and work for, with, and on behalf of Synthomer, consistent with our desired performance
- Report** ▶ Require regular reporting of performance and an improvement plan to report progress to all stakeholders
 - ▶ Publish transparent group performance against improvement plans on an annual basis
- Learn & Share** ▶ Share best practices throughout the organisation and where appropriate, both with and from relevant industry bodies
- Audit** ▶ Conduct regular site and supplier audits to assess the effectiveness of our practices and systems
- Review** ▶ Monitor and evaluate our responsible procurement practices; our performance and the performance of our suppliers, and review the effectiveness of our management systems.
 - ▶ Review the Policy annually, and update at least every 3 years to reflect any changes in scope, materiality and learning from the above. This policy is governed by the Executive Sustainability Steering Committee to ensure alignment with Synthomer's sustainability goals and [Vision 2030 roadmap](#).



Peter Hill
Chair of Synthomer
Synthomer plc
February 2025



Michael Willome
Chief Executive Officer
Synthomer plc
February 2025