



Group Policy: Synthomer Modern Slavery Statement 2018

Our business

Synthomer is one of the world's major suppliers of aqueous polymers with leadership positions in many markets including coatings, construction, textiles, paper and synthetic latex gloves. With the acquisition in 2017 of the Speciality Additives business in Belgium and the 2018 acquisition of the Styrene Butadiene Rubber business in Austria, Synthomer continues to grow its global manufacturing network and introduce new products, geographical strength and capacity to support future growth.

Synthomer has its operational headquarters in London, UK, and provides customers focused services from regional innovation centres in Harlow, UK; Marl, Germany; Kluang, Malaysia; and Roebuck, USA.

This statement sets out the steps the Synthomer Group ("Synthomer") has taken during 2018 to ensure that slavery and human trafficking is not taking place in any of its supply chains.

Corporate Responsibility and our Policies

Synthomer is committed to approaching its business in an ethical and environmentally sound manner and has been committed to the International Council of Chemical Associations' (ICCA) Responsible Care project since the early 1990s.

Our work in this area has been highlighted through the Group's inclusion in the FTSE4Good Index since 2004.

The FTSE4Good index is operated by FTSE Russell and highlights the performance of stock market listed companies against a range of environmental, social and governance criteria. To be eligible for inclusion in the index companies must demonstrate a high level of commitment in areas such as climate change, environmental management and human rights.

In 2018 Synthomer launched its new global Code of Conduct (the "Code") in thirteen languages to ensure that it is accessible by all our employees and stakeholders. The new Code integrates many of our policies into one, easy to read handbook which everyone can use to ensure our daily business is conducted in a professional and responsible manner. The Code plays a key role in maintaining our reputation with our internal and external stakeholders. It also sets out the standards to which we hold ourselves, our employees and our business partners.

Our Diversity, Human Rights and Equal Opportunity policy in the Code includes our responsibility to follow all applicable laws and regulations as well as a complete prohibition of forced, compulsory and child labour. In this policy there is also a link to our Modern Slavery Statement so that everyone can always easily access Synthomer's most recent Statement.

Sourcing and Supplier Management system, updated supplier auditing process and purchasing standard T&Cs

Following on from an initial risk assessment on supplier due diligence processes, Synthomer has committed to and has begun the process of implementing a Sourcing and Supplier Management system that standardises its supplier on-boarding processes. In 2018, Synthomer successfully implemented this system across all European sites and will continue the rollout into all sites in Asia by the end of 2019. The system requires suppliers to provide Synthomer with a copy of their Modern Slavery Act Statement so that appropriate assessments on the risk of modern slavery in the supply chain can be made by Synthomer.


In addition to this, in 2018 the audit process for suppliers was revised and the sustainability requirements in our auditing questionnaire were improved to include multiple questions regarding the supplier's policies and steps taken in eliminating modern slavery and child labour.

In 2018 Synthomer also conducted a review of its purchase terms and conditions and has begun to update them for all countries to include a clear obligation on our suppliers to support and comply with the Modern Slavery Act.

Our next steps

In 2019 Synthomer will look to create a global strategy to further strengthen its methodology and processes for identifying and eliminating modern slavery in its supply chains. Part of the strategy will include at least one full supplier audit per year per department and will include the improved audit questionnaire being filled out and visits to the site. In addition to this there will be smaller audits completed, with suppliers being asked to complete the improved sustainability questionnaire.

This statement was approved by the Board of Synthomer plc on 20 June 2019.



Calum MacLean

Chief Executive Officer – Synthomer plc

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Synthomer Group's slavery and human trafficking statement for the financial year ended 31 December 2018 for the following entities: Synthomer Deutschland GmbH, Synthomer SDN BHD, Synthomer Trading Limited, Synthomer AS, Synthomer SRL, Synthomer UK Limited, Revertex Malaysia SDN BHD, Synthomer Finland OY, Synthomer BV, Synthomer USA LLC, Synthomer Austria GmbH, Synthomer Specialty Resins SRL