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## Conflict Minerals Policy Statement

**As a global multinational company, with business assets throughout the world, Synthomer recognizes the human rights of all people as outlined in the International Bill of Human Rights and is committed to behave responsibly and respectfully regarding all human rights, as set out in the UN Guiding Principles on Business and Human Rights. As part of this commitment, we only source products and services from companies that share our values about working conditions, human rights, business ethics and environmental responsibility. We expect our business partners to respect human rights by also applying similar principles.**

“Conflict Minerals” refers to gold, tin, tantalum and tungsten, which are obtained from cassiterite, columbite-tantalite and wolframite, regardless of where they are sourced, processed or sold. These minerals, also known as 3TG, that are mined in the Democratic Republic of Congo (DRC) have a high risk to be mined in conditions where armed conflict and human rights abuses are known to occur. This policy aims to identify and eliminate the risk of adverse impact associated with extracting, trading, handling and exporting minerals from conflict-affected and high risk areas.

After analysis of our procurement portfolio, we have identified that of the 3TG, only tin is used in the manufacturing of some of our products, specifically at **William Blythe Limited**. Whilst supply chains can be long and complex, we are conducting due diligence based on the Organisation for Economic Cooperation and Development (OECD) for Responsible Mineral Supply Chains (RMSC).

Synthomer’s policy is to be free of conflict minerals in all of our business activities.

### **Our Commitment:**

- Support the aims and objectives of the US<sup>1</sup> and EU<sup>2</sup> legislation on the supply of conflict minerals.
- Not knowingly procure specified metals that originate from facilities in the conflict region and that are not conflict free.
- Ensure compliance with these requirements and work closely with our suppliers to support our commitments and policy, specifically to do the following:
  - Declare whether they have a conflict minerals policy in place which is consistent with the principles and guidelines contained in Synthomer’s policy
  - Conduct appropriate due diligence to verify the country and origin of the materials used in the products which they supply to us

- Identify smelters in their supply chain in the Conflict Minerals Reporting Template (CMRT) and provide a report to Synthomer once per year by September 1 each year.
- Support initiatives that determine whether smelters and refiners conform with Responsible Mineral Assurance Process (RMAP) standards, whilst expecting them to utilize such conflict free smelter / refinery programs that are available.

Supplier's willingness to comply with this policy initiative shall be a factor in our sourcing decisions. In the event that 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 many sources and are key to enforcing responsible sourcing by exercising due diligence in their selection of mineral sources. The RMAP identifies smelters which can demonstrate, through independent third party assessment that minerals they procure do not originate from sources that contribute to conflict in the DRC.

Synthomer expects suppliers to encourage 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 that all suppliers using smelters that are not yet verified as conflict free, to address these smelters with a request to participate in the RMI smelter audit program (or equivalent) or otherwise to switch to an already audited smelter.



Dr Stephen R Blackburn

Group Procurement Director

**Synthomer plc**

<sup>1</sup> Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protec. In August 2012, the United States Securities and Exchange Commission (SEC) adopted a final rule under the Securities Exchange Act of 1934, Rule 13(p)-1, requiring SEC-reporting companies that manufacture or contract to manufacture products that contain "conflict minerals" to conduct due diligence on the origin, source and chain of custody of such minerals and provide specialized disclosure regarding the findings of such diligence.

<sup>2</sup> Regulation (EU) 2017/821 of the European Parliament and the Council of May 2017