



Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

2024 Joint Report

Synthomer Inc. and Synthomer Adhesive Technologies LLC

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires certain entities to disclose actions such entity is taking to prevent and reduce the risk that forced labor or child labor are used in its supply chain. This joint report (the “Report”) is provided by Synthomer Inc. (Business Number 866993942) and its wholly-owned subsidiary, Synthomer Adhesive Technologies LLC (Business Number 747047306) (collectively, the “Reporting Entities”) for the financial year ending December 31, 2024. Synthomer Inc. is a corporation existing under the laws of the State of Ohio and Synthomer Adhesive Technologies LLC is a limited liability company existing under the laws of the State of Delaware. The Reporting Entities are wholly-owned subsidiaries of Synthomer plc (“Synthomer”, the “Group”, “we”, or “our”), a public limited company registered in England and Wales with Company Number 98381 and listed on the London Stock Exchange. The most recent annual report of Synthomer plc is available at www.synthomer.com/ir and incorporated by reference as if fully re-written herein. This Report was approved by the Board of Directors of Synthomer Inc. and Synthomer Inc. as the sole member of Synthomer Adhesive Technologies LLC.

We are committed to the highest ethical standards and sustainable business practices. As a speciality chemicals company, we recognise our pivotal role in contributing to a more sustainable future. Our high standards include an absolute commitment to respecting and protecting human rights across our Group operations and supply chain. We recognise that this is an ongoing challenge, and we continue to build on our actions to strengthen, and improve our processes, practices, and policies. As a Group, we continuously work to identify, raise awareness, and prevent forced labor, child labor, modern slavery, and human trafficking.

Reporting Entities Business and Structure

We are on a strategic journey which aims to focus Synthomer on becoming a speciality solutions platform for the coatings, construction, adhesives, and health and protection market segments. 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 29 & 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 2024, we operated 31 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 worldwide in more than 12 principal end markets including Coatings, Construction, Adhesives and Health and Protection

We employ over 4,000 people in highly skilled manufacturing, innovation, and technical support roles to meet the needs of our customers and our stakeholders in a sustainable way.



Reporting Entities' Supply Chains

Our supply chain comprises a diverse range of over 6,000 suppliers and we spent over £1.7 billion with suppliers in 2024 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.

Policies and Due Diligence Processes to Prevent and Reduce the Risk of Forced Labor and Child Labor in the Reporting Entities Supply Chains

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 and make the right decisions and choices as we perform our daily work at Synthomer.

In 2024, we relaunched our Code of Conduct available [here](#) with dedicated guidance to identify and commit to our prevention of modern slavery and human rights abuse.

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 our promises
- Integrity We act with integrity & 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 forced labor and child labor 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.

The Reporting Entities' Approach to Assessing and Managing Risk of Forced and Child Labor

Synthomer has a wide range of internal policies, standards, and processes in place across the Group to assist in tackling forced labor, child labor, 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. We regularly track awareness and understanding of the Code in our employee surveys and monitor our Code of Conduct training completion. 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. All employees are required to declare their acceptance to the Code of Conduct through our learning management system. Code of Conduct Roadshows will be performed across our key sites in 2025 to raise awareness of our expected behaviours and highlight key areas including Human Rights
- **Supplier Code of Conduct** – this 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 checks for employees.** We have an established process to check potential new employees to the Group, which includes criminal background checks, where required and we are legally able to do so. 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.
- **Whistleblowing hotline – EthicsPoint** is our 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. This is supported by our non-retaliation policy which is on our website: [non-retaliation-policy.pdf \(synthomer.com\)](#). 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. We have made our EthicsPoint system available to all suppliers and external parties via our website to report any concerns anonymously. 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 of modern slavery are identified.
- **Due Diligence of third parties** - we have processes in place to ensure we only work and partner with third parties who have the same ethical standards as ours. Due diligence activities are conducted on



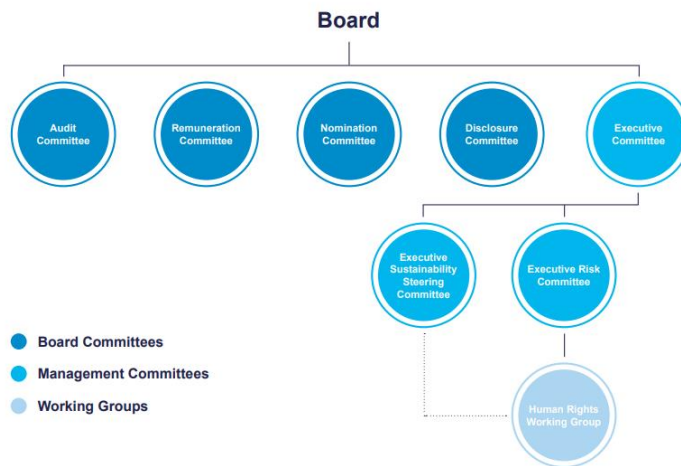
all material and higher risk suppliers (based on location or type of business), and we request those suppliers to positively commit to our Supplier Code of Conduct. Our risk management platform (Diligent) is utilised to manage the onboarding, due diligence, and in-life monitoring of our Agents and Distributors, and we are aiming to expand the use in 2025 for onboarding of other third parties. 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.

- Our **Conflict Minerals Policy 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: [Synthomer Conflict Minerals Policy Dec 2024.pdf](#).
- **SHE – Safety, Health and Environment** are at the heart of our Core Values. We have Global SHE Principles across our manufacturing sites, laboratories and offices translated into local languages. The first two Principles are “Look After Yourself” and “Look After Each Other”.
- **Awareness** – in addition to our training and roadshows 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.

Measures to Remediate Forced Labor or Child Labor and Loss of Income, Training & Assessing Effectiveness

Governance

Modern Slavery Risk Committee



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 remit of the HRWG has been further reviewed and refined to focus on:

1. Increased oversight over Modern Slavery eLearning, including content, audience and frequency



2. Continued review of 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
3. 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
4. Management actions identified in site or supplier audits related to human rights risks
5. Reviewing EthicsPoint cases related to any actual or potential breaches of human rights
6. 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 and Compliance, Sustainability, Operations, HR, and Procurement), and is sponsored by the Group's General Counsel & Company Secretary.

Each year, we identify through our risk assessment process a number of suppliers where we require them to positively commit to our Supplier Code of Conduct or provide clarity that they ensure equivalent standards of behaviour and conduct. The targeted suppliers may change, and the number increases each year as we drive an increasing proportion of suppliers where we require sustainability credentials. The target KPI for 2024 was 100% of the targeted suppliers to sign up to our Supplier Code of Conduct (or equivalent) and we achieved 93%. We have set an ambitious target for 2025.

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. During 2024, we adopted 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 2024 and this was achieved, targeting suppliers that had been selected by the Human Right Working Group (considering the region and sectors in which they operate). We are also targeting eight site supplier audits for 2025.

Specifically for Modern Slavery, being a member of TfS gives our teams access to learning resources on Modern Slavery. These resources were used by our procurement team in 2024, and 87% of our team completed this training and awareness in 2024. Modern slavery training will be further expanded to cover all sites, laboratories and offices in 2025.

A programme of Compliance Roadshows was started in late 2022, and we will continue to deliver a programme of roadshows at many of our sites in 2025 with a focus on regions where Modern Slavery risks are deemed to be higher (as per Walk Free's Global Slavery Index). Our roadshows emphasise our Code of Conduct and several significant compliance initiatives, including risks relating to Modern Slavery.

Our first Modern Slavery Risk Assessment is now due to take place in 2025. The Risk Assessment will focus on our higher risk operational regions and territories identified of being higher risk by our Modern Slavery Risk Heat Map (above). In 2025, with internal and external support, we will assess our operational practices in Saudi Arabia, Mexico and Malaysia.

In order to drive continual improvement, we will also assess our current approach to identifying and responding to Modern Slavery and human rights issues against the OECD Due Diligence Guidelines on Responsible Business Conduct, BS25700 Organisational Responses to Modern Slavery, and the EU Corporate Sustainability Due Diligence Directive (EU CSDDD). We will seek to revise and strengthen our approach where appropriate.



Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entities listed above. Based on my knowledge, and having exercised reasonable due diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

/s/ Joseph Muska

Joseph Muska
Secretary, Synthomer Inc.
Assistant Secretary, Synthomer Adhesive Technologies LLC
“I have the authority to bind the Reporting Entities”
Dated March 25, 2025