

**Modern Slavery Act Statement, pursuant to section 54 of the Modern Slavery Act 2015 for the
Financial Year ended 31 December 2018**

Our Business Model

Synthite Limited is a UK based chemical manufacturer specialising in the manufacture of formaldehyde and formaldehyde based products used in a wide variety of industry applications, including resins, oil and gas treatments, biocides and preservatives. Our supplier and customer base is global with a relatively small number of our raw material suppliers in the UK.

In compliance with the Modern Slavery Act 2015, Synthite offers the following statement regarding its efforts to prevent slavery and human trafficking in its supply chain.

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers, interns and any other third party representative.

We expect all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

How we seek to embed our anti-slavery policy in practice

To underpin our policy commitments, we will further implement the following measures over the course of the financial year.

- We will conduct risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery so we can focus our efforts on those areas most 'at risk'.
- Where appropriate, we will engage directly with suppliers via email in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains.

Supply Chain Management

Synthite is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking.

We provide our employees with more than the minimum legal requirements in terms of salary and benefits and operate our site to ISO:9001, ISO:14001 and FEMAS standards and are regularly audited by our customers.

We recognise that modern slavery is a complex supply chain issue, and as a result we internally review our supply chain to evaluate human trafficking risks and slavery risks. We will conduct supplier and customer visits where possible to review business processes.

Responsibility for this policy

The board of directors has overall responsibility for this policy and in ensuring that the company complies with all its legal and ethical obligations.

The Supply Chain and Purchasing Lead will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Breach of this policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

Status of this policy

This anti-slavery policy will be reviewed by the Company's board of directors on a regular basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

David J Kelso
Director
Synthite Limited
January 2019