

Tyman 2018 Statement on Modern Slavery

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It describes the actions taken by Tyman plc and its subsidiaries (together the "Group") during 2017 to address the risk of modern slavery and human trafficking being present in the Group's business and supply chain.

Our business

Tyman plc is a leading international supplier of engineered components to the door and window industry. The Group's three Divisions – AmesburyTruth, ERA and SchlegelGiesse – are market leaders in their respective geographies. The Group employs nearly 4,000 people and operates facilities in 19 countries worldwide.

Supply chains

Each Division is responsible for the management of its own supply chain, the contractual terms entered into with suppliers and for ensuring adherence with the anti-slavery provisions within contractual terms. Risk assessments of the supply chains have been carried out at a divisional level, with progress made reported to the Group Board.

The Group's combined supply chain encompasses over 2,000 suppliers and includes suppliers to Tyman Sourcing Asia ("TSA"), which is responsible for the Group's outsourced manufacturing and supply chain in the Far East. The Group's suppliers provide a wide range of items, from raw materials to component parts and finished products.

Human rights

The Group is committed to respecting human rights across all our operations and aims to work at the highest international standards as well as complying with local legislation. The Group fully supports the Modern Slavery Act 2015 and will seek to ensure that its activities and activities within the Group's supply chain do not infringe or encourage abuses of any human rights.

Code of Conduct

The Code of Conduct sets out the minimum standards of behaviour and business practices expected from everyone within the Group. The Code of Conduct has been adopted by divisional management and is included as part of all employee handbooks.

The Code of Conduct states that every Group employee has the right to work in an environment that supports dignity, diversity and fosters a culture of respect.

The Group is committed to supporting employment policies and practices that make provision for equal opportunities and non-discrimination, and that comply with relevant local legislation and accepted employment practice codes which ensure that the provision of labour is freely given.

Group employment policies and practices must ensure that an individual's skills, experience and talent are the sole determinants in recruitment and career development rather than age, beliefs, disability, ethnic origin, gender, marital status, religion and sexual orientation.

Steps taken in 2017 to ensure the prevention of modern slavery within our organisation

1. Supplier Code of Conduct

Previous standards of behaviour have been compiled into one Supplier Code of Conduct, applicable to all Group suppliers. This was approved by the Risk Management Committee and is being embedded into all communications with suppliers, including supplier agreements.

Follow up compliance assessments in respect of this Code will be carried out during 2018.

2. Supplier audits

The Group's greatest risk of exposure to modern slavery is through its supply chain. In order to ensure Tyman's suppliers operate to the highest standards, the Divisions carry out risk based checks which normally include on-site visits or written assessments.

Checks undertaken by the Divisions during 2017 included the following:

- Coverage of compliance audits continued for major suppliers, especially those located in geographies considered to have an elevated risk of modern slavery. These audits were extended to take into account a larger number of smaller suppliers, who may be considered to be at risk of modern slavery, as resources in these organisations is often limited.

These checks include reviewing welfare policies and contracts of employment with a particular focus on any indications of forced labour, under age working, and human trafficking. On-site visits incorporated physical inspections of working conditions and welfare facilities, including staff dormitories, where applicable.

- Ad-hoc visits to suppliers have also ensured consistency of production standards and welfare of all site staff. One such visit, to a relatively minor supplier, raised concerns which was followed up with an in-depth on-site audit. The audit found no evidence of modern slavery, but did show a number of deficiencies which needed to be addressed. A repeat visit confirmed these areas had been resolved and further visits would ensure the maintenance of welfare standards.
- During the year the Risk Management Committee visited the TSA office in Ningbo, China. As part of this visit the Committee received a briefing on the work of TSA and visited the TSA offices.

The Committee also visited a number of suppliers in the region, which provided the opportunity to meet local management teams and see production facilities and processes first hand. The Committee was particularly interested in seeing the facilities afforded the production staff including health and safety measures provided.

This visit coincided with the first supplier conference, which was attended by TSA's leading suppliers and provided the opportunity for the Risk Management Committee to meet with local manufacturers and to provide them with some further background to the work of each of the Tyman Divisions

- Suppliers in geographies not considered to have an elevated risk of modern slavery have participated in written assessments to confirm adherence to the Supplier Code of Conduct.

3. Training

Tyman expects all Group employees to respect human rights and to treat people fairly within its operations. The Tyman Code of Conduct details the minimum standards expected of each employee whatever their role and wherever they are located.

Staff training in this area is now conducted on an annual basis for anyone who has been identified as being exposed to the relevant elements of the supply chain. Training covers topics such as awareness of modern slavery practices and the identification and reporting of suspected occurrences of modern slavery or human rights abuses.

Raising concerns

Everyone at Tyman has a responsibility to be aware of the risk of modern slavery and human rights abuses in our business and supply chain. All employees and those working for, or on behalf of the Group are encouraged to report any form of wrong doing and/or malpractice at work either through contacting a relevant senior manager or via the independent whistleblowing service, through which they may voice their concerns anonymously. All cases are treated in the strictest of confidence and are fully investigated.

Progress in the year ahead

The programme of work to counter the risk of modern slavery is now well established in the Divisions. Activity in 2018 will be reported in the Group's 2019 Statement on Modern Slavery.

This Statement has been reviewed and approved by the management board of each the Group's Divisions.

This statement is made in respect of the financial year ended 31 December 2017 and was approved by the Board of Tyman plc.

Louis Eperjesi

Chief Executive Officer

2 March 2018