



Integrity in action

THE TYMAN CODE



Contents

A message from our Chief Executive

Our purpose and values

Working with our Code

- About our Code7
- Our integrity check8
- Your voice matters: speak up.....9

Caring for people

- Making safety our first language.....12
- Working together.....13
- Protecting personal data 14
- Respecting human rights15

Conducting our business

- Working with our business partners17
- Avoiding conflicts of interest..... 18
- Preventing bribery and corruption..... 19
- Competing fairly 20
- Ensuring product safety and quality..... 21
- Complying with trade controls 22
- Preventing tax evasion and money laundering..... 23

Protecting our assets

- Maintaining accurate records 25
- Communicating externally 26
- Keeping information secure 27
- Preventing insider dealing 28
- Safeguarding company assets 29
- Protecting intellectual property 30

Contributing to society

- Protecting the environment..... 32
- Engaging with our communities 33

Glossary



A message from our Chief Executive

The origins of Tyman's businesses date back to 1838. Over many generations, employees have worked hard to build the reputation that we enjoy today. A culture founded on integrity has always been key to achieving our long-term goals and creating a company where we can all be proud of what we do. This is why we are launching our Tyman Code, 'Integrity in action'.

This document has been developed with consultation and input from across Tyman. It covers our purpose, our values, our approach to making decisions and how we are all empowered to be the voice that matters and speak up. It also sets out our legal responsibilities in plain language.

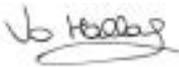
Please take the time to carefully review the Code in its entirety to make sure you understand it and are committed to it. Each and every one of us must know the Code and follow it, without exception. It will not have the answer to every possible situation, so please stop and seek help if you ever face a dilemma or question that cannot be resolved by reference to the Code.

We each have an active responsibility to embed this Code as a fundamental part of our working culture across all our businesses. This is not a tick-box exercise: it is at the heart of our ability to compete. Companies that put acting with integrity at their core attract and retain great people, build lasting strategic relationships with customers and suppliers, and secure the long-term backing of shareholders.

We must each behave like owners and treat our culture of integrity as very precious. Speak up if you ever feel our Code might have been compromised. Do not leave yourself isolated. Raising concerns or questions will always have full support from me and the Executive Committee.

We can be proud of our success at Tyman, but how we achieve that success matters, both for today and to secure our future for the generations to come. Living the value of **do the right thing** is an essential part of how we conduct our business every day, to allow us to consistently **make it happen** and **never stop growing**.

Thank you.

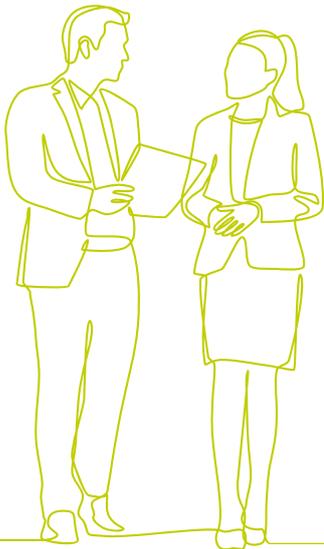


Chief Executive Officer



Our purpose

Our purpose is at the core of everything we do, unifying us in a common cause and growth strategy. It inspires Tyman people to make a positive contribution every day.



Millions are kept safe and comfortable at home and at work around the world because of our expertise. We know that to be experts, we must have deep understanding of our customers and their needs, an uncompromising commitment to both safety and quality, and a restless ambition to innovate. We never forget that experts are people: growing and energizing our talent is at the heart of what makes us different.

With our expertise, we have the power to transform what we touch. We commit to transform living and working spaces, to transform people and careers, to transform the value of our businesses, and to transform our impact on communities and society.

Our purpose is to transform the security, comfort and sustainability of living and working spaces through our expert touch.

Tyman. The expert touch that transforms.



Our values

Our values frame how we work with each other and with our partners. The way we describe and how we live our culture is captured in our values. They are the foundation of our success and essential to achieving our purpose.

THE TYMAN TOUCH

Do the right thing

Integrity is the cornerstone of our business

- We demand transparency, and we always do what it takes to build or repair trust
- We value, respect and look out for each other, and we are strongest when we are most diverse
- We speak up and take care to listen, because every voice matters



Never stop growing

There is no limit to what we can achieve

- We take every opportunity to learn and develop, professionally and personally
- Every day we make the continuous improvements which people deserve from us
- We believe in the power of creativity to break through with new thinking, new ideas, new solutions

Make it happen

We are action people

- We behave like owners, always ready to hold ourselves and others to account
- Inclusive teamwork creates our best results
- We take pride in bringing positive energy to our work, and our performance is fed by our passion



Working with our Code

- About our Code
- Our integrity check
- Your voice matters: speak up

*'Integrity is doing the right thing,
even when no one is watching.'*

C.S.Lewis



What

Our purpose and values provide a foundation for our decisions. Our Code provides the ethical framework for how to apply this purpose and values to situations we may face.

It helps us all understand what 'Do the right thing' means at Tyman. Our Code also summarises our policies and the laws and regulations we must follow.

Our Code will, and should, challenge us. Its function is to make sure that individually and collectively, we ask the right questions, and make the right decisions in the right way. Having it front of mind in everything we do will protect our people and our business, and enable us to create most value for all of our stakeholders.



Who

All of us

This Code applies to all our employees around the world, at all times. Every one of us has the responsibility to ask questions, and every one of us makes decisions, big or small, every day.

We equally expect all our business partners to follow this Code and demonstrate their commitment to its principles.

Additional responsibilities for managers

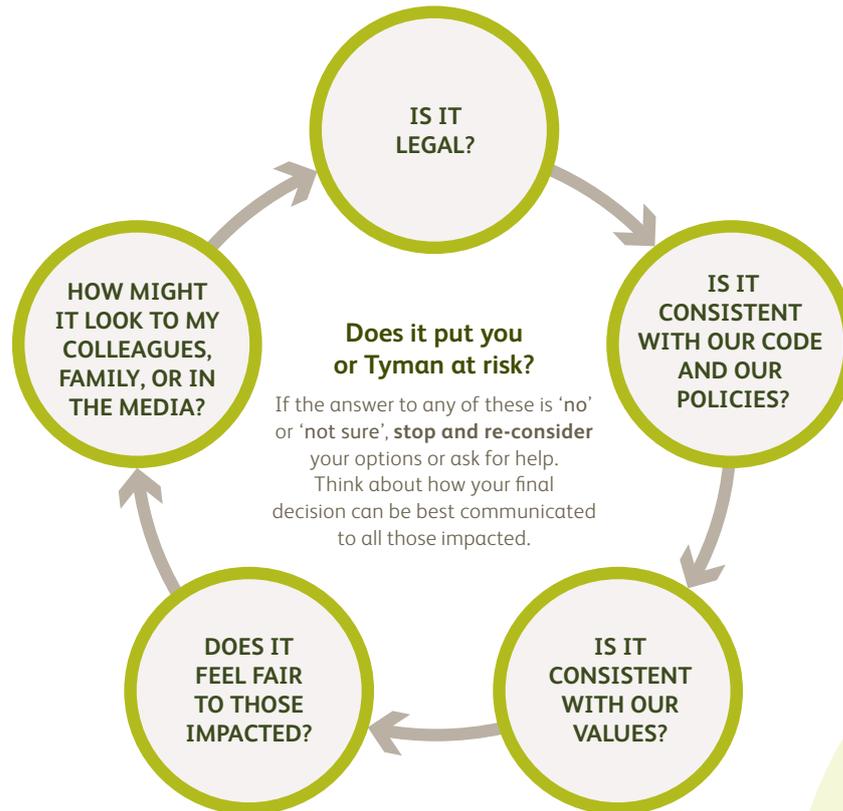
If you are a Tyman manager or leader, you have a further responsibility – not just to follow the Code, but to be an active role model, showing by your own words and actions that the Code is at the centre of day-to-day decisions and discussions in our business. This means making time to discuss our Code with your people and with our business partners, ensuring a team environment where everyone feels safe to raise questions and concerns, and a consistency of action against any violations.

How

Make sure you and your colleagues are familiar with this Code and the supporting materials highlighted within it. Make the time to talk about how it applies to your key activities and how it can support you if you have any questions or concerns regarding what to do. It is an essential guide to the behaviours that will enable us to act with confidence, take appropriate business risks and to foster a working culture of respect and honesty.

Our integrity check

Conflicts, dilemmas and difficult decisions are a fact of life in every business. What matters is whether we recognise and deal with these, or hope they will go away. If you are facing a dilemma or difficult decision, please use the following checklist. As you go through the questions, keep an open mind as to what pressures or biases could be impacting your judgement or that of those around you.



Your voice matters: speak up

Always remember

We are all actively responsible for living up to our Code and our values. This means that if you are aware of, or reasonably suspect, something which is unsafe, unethical or unlawful or that may not be in accordance with our Code, our policies and procedures, you have a responsibility to be the voice that matters and speak up.

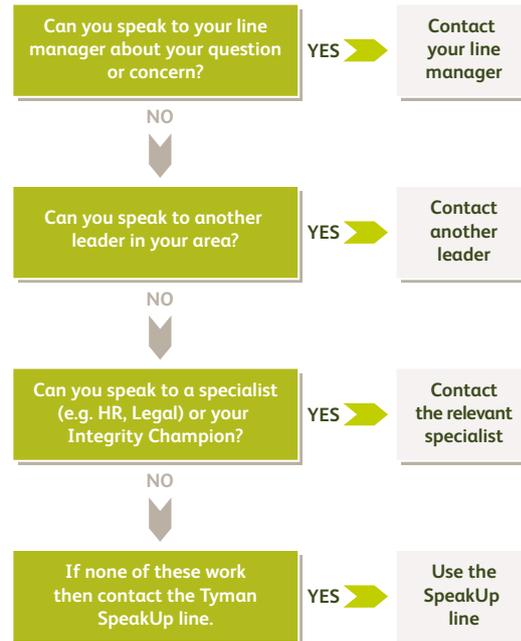
This is not always easy, but it is doing the right thing. No one at Tyman should be left feeling isolated and unable to ask for help, even if you do not have all the facts. Please raise your concern promptly: the earlier you speak up, the more likely it is that the impact of the situation can be minimised.

We do not tolerate any form of retaliation for issues raised in good faith.



We speak up and take care to listen.

Raising a concern



Tyman **SpeakUp** line

The Tyman **SpeakUp** Line is available 24 hours a day, 7 days a week. It is staffed by external independent specialists. When you contact **SpeakUp**, it is important that you provide as many details as possible (e.g. who, what, when, where). The summary report will then be reviewed and followed-up as required. Tyman will take all concerns seriously.

It helps us investigate an issue if you provide details of your name when you make a report. However, you can choose not to give your name, where allowed by local law. If you decide to remain anonymous, you will receive a reference number at the end of your call or online report. This will allow you to call or log back in to add information or find out if you can further assist in the investigation.

We know that deciding to speak up about an issue in the workplace can be difficult and it is not always possible to speak directly to your line manager, another leader or a specialist. If this is the case, you can contact **SpeakUp** at www.tymanspeakup.com or by one of the local telephone numbers published there.

Other ways you can help

We are keen to hear from you if you are interested in getting involved in our Code engagement and awareness work, or if you have ideas to further strengthen Integrity in Action and embed our 'Do the right thing' value.

Tell us the good stories too! There will be many examples every day of our people doing the right thing when faced with ethical dilemmas or difficult choices. If you become aware of examples of outstanding ethical leadership or integrity by others, please tell your local Integrity Champion. Alternatively, please email: ourcode@tymanplc.com.



Caring for people

- Making safety our first language
- Working together
- Protecting personal data
- Respecting human rights

*'Live so that when your children think
of fairness, caring and integrity,
they think of you.'*

H. Jackson Brown, Jnr.



Why this matters

At Tyman, safety is our first language. This means it takes priority every time. Everyone has the right to go home safely to loved ones at the end of every day. We can all be proud that safety is at the heart of our culture.

What I need to know

- All injuries and occupational illnesses are preventable
- Safety is everyone's responsibility
- Every operational activity in the Group should have clear procedures and safety protocols defined, including the required personal protective equipment (PPE)
- Working safely and following all safety rules is a condition of our employment
- The Group has a rigorous reporting and investigation process for any incident or safety observation

Make it happen

- Take personal responsibility for the safety of the work environment for yourself and others around you
- Ensure you are trained in the relevant procedures and safety protocols for any task you undertake, and you are wearing the right PPE
- Do not interfere, override or disable any safety equipment/devices
- Promptly and accurately report any safety incident, near miss, unsafe act or condition
- Apply the same principles to any contractors, suppliers or customers working on our sites
- Your voice matters: speak up

Need help?

- Speak to your line manager, team leader, or local or divisional health & safety contact
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Safety is our first language: it takes priority every time.



Why this matters

The strength of our working culture is the most valuable resource we have as it impacts everything we do, every day. It is fundamental to our ability to deepen our expertise and never stop growing.

What I need to know

- We each carry an active responsibility for bringing our values to life in our daily actions and decision-making; this requires continued discussion and mutual support
- Diversity of background, experience and thought strengthens our business and enriches decision-making
- A genuinely diverse, inclusive and respectful working culture will enable us to continually grow as an organisation
- Each of us may have biases that we are not aware of and these may cloud our judgment of people and situations
- To truly enable such a working culture requires constant effort and can never be taken for granted. Just because it is the right thing to do and good for our business does not mean it is easy

Make it happen

- Actively seek and value the views and unique contributions of others
- Play your part in creating a working environment that feels genuinely inclusive by treating others with respect and empathy
- Speak up if you observe any form of discrimination, harassment, bullying or any behaviour that makes you concerned
- Take pride in combining ideas to achieve the best outcome
- Ask questions and engage in constructive debates to make appropriate and informed decisions, both within and beyond your team to help us never stop growing

Need Help?

- Speak to your line manager, team leader, local HR manager or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Bring our values into our daily actions.



Why this matters

Tyman needs personal data to run its business. It is essential that prospects, customers, colleagues or other parties can trust us and our products to respect their privacy and protect their personal data. To maintain this trust, we must exercise a duty of care towards all the personal data we collect, process and hold.

What I need to know

- We must only process personal data in a way that aligns with our values, would be how we want our own personal data handled and complies with our legal obligations
- Whenever collecting personal data, we must consider:
 - whether the people who own the personal data know that we are collecting it and why
 - whether we are collecting it for fair reasons
 - whether we are collecting more than we need
 - how we are keeping it safe
 - when we must destroy/delete it

Make it happen

- Respect everyone's privacy rights and look after personal data as you would wish your own to be cared for
- Report any loss or compromise of personal data immediately
- Think about the role of personal data upfront in any project planning or product development, including whether a data privacy impact assessment is necessary
- Encrypt any electronically stored or transmitted (e.g. via email) personal data and send the passwords separately
- Only ever transfer personal data to third parties when you know we have a data transfer agreement in place
- Ensure that any requests to access personal data are promptly responded to

Need Help?

- Speak to your line manager, team leader, local HR manager, data privacy officer or IT department
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information:

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Exercise a constant duty of care to protect personal data.



Why this matters

Discrimination on the basis of race, religion, national origin, gender, sexuality, age, disability or background is ethically wrong and illegal. We passionately believe that people with varied backgrounds and perspectives allow Tyman to never stop growing.

Human rights abuses sadly continue to be prevalent in our society. We have a moral and legal duty to ensure that everybody working for us throughout our supply chains does so freely and safely.

What I need to know

- Tyman is committed to providing equal opportunities in recruitment, employment, training and development
- Tyman does not tolerate:
 - any form of discrimination
 - any physical or verbal abuse, harassment or intimidation
- As a global business, preventing modern slavery, child labour, human trafficking and other human rights abuses is something we are fully committed to across all our activities directly and indirectly throughout our supply chains

Make it happen

- Ensure that all employees and anyone who works with us does so freely and safe from abuse
- Diligently support human rights due diligence for any business partner Tyman is looking to engage
- Speak up if you suspect that anyone's human rights are being hurt in connection with our business, whether directly or indirectly
- Ensure that decisions on hiring, pay, benefits, promotions and other employment-related matters are always based on an individual's experience, performance and skills and the company's needs
- Continually assess your habits, behaviours and views for unconscious bias, whether conscious or not

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or local HR manager
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Respect the human rights of everyone connected with our business.



Conducting our business

- Working with our business partners
- Avoiding conflicts of interest
- Preventing bribery and corruption
- Competing fairly
- Ensuring product safety and quality
- Complying with trade controls
- Preventing tax evasion and money laundering

'If you believe in unlimited quality and act in all your business dealings with total integrity, the rest will take care of itself.'

Frank Perdue



Why this matters

Our business partners are a critical part of our operations. A healthy, positive and honest relationship with our business partners helps to ensure we get the materials, products and services we need.

What I need to know

- We expect our business partners to always act in accordance with laws and regulations, and to meet the highest ethics and compliance standards
- We always undertake appropriate due diligence on our business partners and carefully choose to do business only with those who share our values and principles
- We are responsible for the actions of our business partners when they are acting on our behalf

Make it happen

- Follow our due diligence procedures before engaging a new business partner or renewing a relationship
- Avoid or disclose in advance any actual or perceived conflicts of interest when engaging a business partner
- Select business partners who respect our values and ensure all business partners know the standards of behaviour we expect
- Treat our business partners fairly and as we would wish to be treated, including communicating clearly and being honest
- Ensure appropriate protections are in place before sharing our assets and intellectual property with business partners
- Show respect for any assets, intellectual property and confidential information shared with us
- Be vigilant about our business partners' behaviour and speak up if you have any concerns

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or local HR manager
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Build honest and positive relationships with all our business partners.



Why this matters

Allowing external or personal interests to conflict with and influence our decision-making at Tyman is risky both for our business and your own reputation.

What I need to know

- Conflicts of interest arise where there is the potential for an employee's personal or external interests to influence their judgement in doing what is best for Tyman. Conflicts of interest can arise from situations including:
 - Hiring, supervising or being involved in the personnel decisions of friends or family members
 - Having a family or financial interest in a supplier, competitor, customer or other business partner
 - Ownership of, investment in, or an alternate employment with a company who is in the same industry as Tyman, or is a business partner of Tyman
- The mere perception of a conflict of interest can be as damaging as an actual conflict of interest

Make it happen

- Avoid conflicts of interest between external/personal interests and your responsibilities at work where possible, because they can impact the quality of your decision-making at work
- Declare any potential conflicts of interest in advance, because most conflicts of interest only become problems if they are not quickly identified and managed
- Seek advice if you are in doubt as to whether a potential conflict exists
- Uphold our conflicts of interest policy, which applies to everyone in Tyman, regardless of seniority, location or role

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or local HR manager
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Avoid or declare any conflict between personal interests and your work responsibilities



Why this matters

Bribery or corruption is the giving or receiving of anything of value (e.g. money, entertainment, job offers, confidential information) in order to gain an improper business advantage. It is a major source of harm to economies, societies and individuals. It is also illegal.

What I need to know

- We do not tolerate giving or receiving bribes in any part of our business, whether involving Tyman colleagues, or any parties working on our behalf (such as agents or distributors)
- We do not permit facilitation payments (small improper payments for routine government action) – there is no lower limit that makes bribery acceptable
- Our zero tolerance applies equally in every country where we operate: local customs are never an excuse for bribery
- Gifts, entertainment, sponsorships and charitable donations all need particular care to ensure they cannot be perceived to give an improper business advantage
- No one at Tyman has the authority to ask you to support or ignore bribery in our business dealings

Make it happen

- Never engage in bribery or corruption, even if it means a loss of business
- Monitor and regularly check our business partners; always escalate any suspicion you have or red flags that you see
- Be thoughtful and transparent in all forms of gifts or entertainment (whether giving or receiving), and sponsorships or donations
- Keep accurate records that honestly describe a payment's purpose
- Always be vigilant toward bribery risks in order to best protect Tyman and all our colleagues

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or local HR manager
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Win with integrity, or walk away.



Why this matters

Strong laws to ensure that companies compete fairly are rightly enforced in every country we operate in. Tyman will always grow best in markets that are open and fair. Conversely, anti-competitive behaviour leads to significant corporate fines, reputation damage and potentially criminal prosecution for the individuals involved.

What I need to know

- Anti-competitive activities include:
 - Discussing or sharing sensitive commercial information (e.g. pricing, bids, customers or strategies) with competitors, including indirectly through third parties (e.g. a common supplier)
 - Discussing the sharing of customers or markets
 - Discussing with competitors on if/how to bid for certain contracts
 - Discussing with competitors to limit production
 - Certain joint selling or purchasing arrangements with competitors
 - Making a distributor sell products for a minimum price
- Any form of signalling, silence as implied agreement or oral discussions about commercially sensitive information would be equally anti-competitive

Make it happen

- Never enter into anti-competitive activities and do not even risk the impression of doing so
- Ensure that all our commercial planning and decision-making is undertaken independently from our competitors
- Only work with market intelligence developed from our own analysis or gathered from legitimate market sources
- Take care when interacting with competitors at trade shows and other events and log these interactions in line with our Fair Competition Policy
- Contact Group Legal immediately if you have a fair competition concern

Need Help?

Speed is important when raising a competition law concern!

- Speak to your line manager, local Integrity Champion or Group Legal
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

We thrive best in markets that are open and fair.



Why this matters

Across all our brands, our reputation is built on years of uncompromising commitment to the safety and quality of our products. Product safety and quality is vital for us to be able to keep growing our business.

What I need to know

- Ensuring the safety and quality of our products and services requires constant effort and vigilance from everyone at Tyman
- We embrace legislative and regulatory requirements and associated certifications because they help us continuously improve our quality and safety
- We support the integrity of the rigorous tests that underpin these requirements and accreditations
- We go further than regulatory requirements where we identify other opportunities for improvements to the safety of our products for our customers, our users and the environment
- We care about and diligently address small concerns to ensure that larger issues never arise

Make it happen

- Follow our product quality plans and procedures without compromise
- Never seek to alter, tamper with or influence the findings of any product testing
- Ensure that our products and those of our suppliers conform to their specification
- Act promptly when product quality or safety issues are raised by our customers
- Report any non-conformity to specification to your line manager immediately
- Speak up if you have any concern, however minor
- Share suggestions that might improve our products, processes or controls and listen carefully to suggestions raised by others

Need Help?

- Speak to your line manager, team leader, product quality leader, local or divisional health & safety manager, or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Listen openly to any product safety or quality control question or concern.



Why this matters

We need to know who we are legally permitted to do business with wherever in the world our products are in demand. Breaching relevant trade controls could have serious consequences for our business and any individuals involved.

What I need to know

- 'Trade controls' are the laws that govern cross-border trade in goods, services, information and technology. They include customs and tax requirements, and what can be imported and exported with reference to government sanctions and restricted end-uses
- An illegal export can occur by simply sharing restricted information over the phone or via email, by showing such information to a foreign national, or by travelling with restricted information
- The consequences for both Tyman and individuals involved in any breach of trade controls can be very serious
- Certain of our products may have end-use restrictions (e.g. smart security cameras) and, in such cases, appropriate due diligence must be conducted into all proposed end-user relationships

Make it happen

- Speak with your manager and your local trade controls expert to ensure you are familiar and up to date with any trade controls that impact your areas of responsibility
- Ensure that appropriate due diligence is conducted in respect of anyone who we do business with
- Do not travel with or disclose restricted information
- Ensure that third parties acting on our behalf follow our trade controls standards

Need Help?

- Speak to your line manager, team leader, local trade controls expert, divisional finance team or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Trade controls can be complex; if you have a doubt, stop and ask!



Why this matters

Financial crimes such as tax evasion and money laundering are unethical and highly damaging to a company's reputation. Furthermore, money laundering allows criminals to fund serious organised crime. Tyman will not allow its businesses to be used to facilitate tax evasion or money laundering.

What I need to know

- Tyman will always follow tax regulations and pay any taxes we owe
- 'Facilitating tax evasion' is the corporate criminal offence when a company's employees or agents help a taxpayer avoid tax
- 'Money laundering' is the process of concealing criminal proceeds by making them appear legal through a series of transactions
- Our business is not immune to trade-based money laundering
- To protect ourselves from facilitating tax evasion and money laundering, we need to know who we are doing business with and so we have due diligence procedures to protect both our business and our employees
- It is illegal to 'tip off' a third party i.e. making them aware of negative information discovered about them

Make it happen

- Conduct appropriate due diligence into anyone we do business with and monitor such third parties on an ongoing basis
- Do not engage in business relationships with any party who we believe does not share our values or may be actively engaged in financial crime including tax evasion
- Stay alert to any changes in customer, supplier or other third parties details, circumstances and priorities that may increase such risks
- Promptly escalate any concerns that you may have internally – do not tip off the third party

Need Help?

- Speak to your line manager, team leader, divisional finance team or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Know who we do business with.



Protecting our assets

- Maintaining accurate records
- Communicating externally
- Keeping information secure
- Preventing insider dealing
- Safeguarding company assets
- Protecting intellectual property

*'Money is a great asset,
talent is an extraordinary asset,
and courage is an exceptional asset.'*

Matshona Dhliwayo



Why this matters

Complete and accurate business records are legal requirements and essential for preserving Tyman's reputation and value. Many good companies have been seriously damaged by allowing small reporting errors or misleading information to go unchecked and to grow. Such behaviour can also have serious consequences for the individuals involved.

What I need to know

- Policies and local laws govern much of our record keeping, reporting and data retention. This includes all product inspection and testing requirements, as well as financial records
- Many decisions require retention of an auditable trail of the supporting information
- Changing records to seek gain or the avoidance of loss (whether by the company or individuals) is fraud, which is a criminal offence

Make it happen

- Ensure you are familiar with the record keeping and retention policies and rules that impact your role
- Ensure all our records are accurate and complete
- Never record or provide false or misleading information
- Never forge signatures, backdate or falsify documents
- Only destroy or delete business records in accordance with document retention policies
- If you have a concern, be the voice that matters and speak up

Need Help?

- Speak to your line manager, team leader, divisional finance team or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Do not allow errors in our business records to go unchallenged.



Why this matters

In an increasingly connected and transparent world, we must communicate with clarity and accuracy. This matters for the strength of our brands and reputation which hold significant value, helping us to attract and retain the best people and partners.

What I need to know

- We are all guardians of our reputation, which is built on a foundation of trust
- What we say about Tyman on social media or in other published forums can stay public for many years
- It is important that Tyman speaks with one clear and consistent voice when providing information to the public and the media. For this reason, only certain employees may speak publicly on behalf of the Group or any of its companies

Make it happen

- Keep all communications professional and consistent with our values and policies
- Ensure that all our sales and marketing practices support our values:
 - Marketing claims must be truthful and substantiated
 - Any opinions published for Tyman or competitor products/services must be fair and transparent
- Never engage in activity online that would be unacceptable in person
- Ensure that your personal social media activities could never be interpreted as representing Tyman
- Only use your business email for business purposes
- Write in a way that you would be happy to see if made public
- Never quote or refer to business partners (e.g. suppliers, customers, intermediaries, distributors, joint venture partners) without their prior written consent

Need Help?

- Speak to your divisional marketing leader or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Communicate responsibly: our reputation is at stake.



Why this matters

The confidential information we hold as a business (including personal data, intellectual property and our business partners' data) is a critical business asset. Losing it can lead to loss of trust, long-term reputational damage, significant fines and other penalties.

What I need to know

- Our physical and digital information needs to be protected against both negligence and criminal attacks
- Confidential information includes financial, operational, product, personnel and business partner information, and even samples of materials or prototype equipment
- Criminals are using increasingly sophisticated methods to manipulate employees at all levels into handing over valuable data or enabling access to a company's systems
- More information security incidents are caused unwittingly by employees than knowingly by external criminals

Make it happen

- Do not discuss confidential information where you can be overheard, whether inside or outside of a Group site
- Do not leave confidential information unattended or laptops/phones unlocked. Clear your desk of all papers at the end of the day
- Only share confidential information in line with our policy
- Do not use or disclose the confidential information of third parties without their express permission
- Encrypt sensitive digital information. Passwords to encrypted files should be sent separately to the recipient
- Be careful with unknown websites or phishing emails, and do not open suspicious links or attachments
- Double-check if you receive an unexpected call asking you to take an unusual action or provide confidential information. If it seems suspicious, it probably is

Need Help?

- Speak to your line manager, team leader, local or divisional data privacy manager, or IT department
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Information is a very valuable asset – protect it!



Why this matters

In your work, you may come across 'inside information' about Tyman or other publicly traded companies with whom we do business. Using this information for personal gain or sharing it is both unethical and also a criminal offence.

What I need to know

- 'Inside information' is information that could have a significant impact on a company's share price if publicly disclosed. Examples include financial results, a potential acquisition or litigation
- Buying/selling shares when you have inside information about a company is known as, insider dealing, and is illegal
- Determining whether information is inside information or not is a specialist topic. You should always seek the advice of Group Legal if you are unsure
- Group Legal maintains lists of people who have access to confidential information that may be inside information – employees are notified if they are on such a list and are subject to additional restrictions in this case

Make it happen

- Do not deal in Tyman shares (or encourage any third party to deal) while you have inside information or information that may become inside information without first obtaining clearance to deal from Group Legal
- Always follow the Tyman Share Dealing Code
- Ensure that any potential inside information that you have access to is properly stored, protected and managed
- Promptly escalate any breach or misuse of inside information to Group Legal
- Do not spread false information about the Group: this may be 'market abuse' or 'market manipulation' and therefore illegal

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or Group Legal (cosec@tymanplc.com)
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Do not misuse inside information.



Why this matters

Company assets enable Tyman to operate safely and efficiently, and to grow our business. It is important that we all 'behave like owners' and protect them.

What I need to know

- 'Company assets' include all physical assets, intellectual property, commercially valuable information and funds. They include both those belonging to Tyman and those of third parties
- Each of us is entrusted with the care of company assets. We all have a responsibility to respect and care for them, by using them properly and protecting them from loss, damage, theft, waste and improper use
- This applies to all assets from expensive machinery through to office supplies

Make it happen

- Ensure that company assets are only used for the purpose for which they were designed
- Never use company assets for personal use without the appropriate permissions
- Protect our assets from loss, damage, theft, and misuse
- Report the damage, theft or misuse of any company asset immediately
- Be prudent when purchasing company assets and always follow our established procurement procedures
- Ensure that the disposal of any company asset is done following the relevant procedures
- Exercise integrity when claiming expenses – ensure that all expenses claimed are proportionate and for valid business purposes only
- Apply the same standard of care to any assets of our customers or business partners that are shared with us or in our possession

Need Help?

- Speak to your line manager, team leader, divisional finance team or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Protect all our business assets.



Why this matters

Our innovations and intellectual assets underpin our expertise and must always be protected. We are all responsible for ensuring their safe keeping. This responsibility extends to the intellectual property ('IP') of third parties in our care and we will not breach third party intellectual property rights.

What I need to know

- To the extent permitted by law, Tyman owns the rights to all IP that we as individuals create while working for Tyman. You must not use this IP in a manner that is inconsistent with Tyman's ownership rights
- We respect the IP rights of third parties and expect others to respect Tyman's IP rights
- Contracts with our business partners should clarify who owns any IP developed during the relationship

Make it happen

- Protect all IP, developments and innovations that belong to us or that third parties have entrusted to us
- Only share our IP with any potential or existing business partners under the instruction of your Division's IP Manager or Group Legal
- If you develop any new innovation (whether product, service or technology), inform your local leadership so that it can be properly protected
- Only use third party IP in line with our proper-use licence
- Alert Group Legal immediately if you become aware of a breach of our IP rights

Need Help?

- Speak to your line manager, team leader, local Integrity Champion or divisional innovation leader
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our "Integrity in Action" site for further guidance and examples

Our intellectual property underpins our expertise: protect it.



Contributing to society

- Protecting the environment
- Engaging with our communities

*'Look after the land and the land will look after you,
destroy the land and it will destroy you.'*

Aboriginal proverb



Why this matters

With the pressure on our climate and natural world, we have a moral duty to run our operations as environmentally sustainably as possible. It makes good business sense: by minimising waste and maximising reuse, we are improving our profitability. We also have an opportunity to develop products that can positively contribute to a more sustainable world.

What I need to know

- Tyman is firmly committed to being environmentally responsible and takes very seriously our role in not only meeting all laws and regulations but reducing our impact wherever practicable
- There are opportunities to improve our environmental impact across all aspects of our business

Make it happen

- Understand and adhere to all applicable environmental laws, permit conditions, and policies and procedures for your work area
- Minimise usage of materials, packaging, energy and water; reuse or recycle where feasible
- Identify and manage hazardous chemicals properly; minimise and dispose of waste correctly; and reduce emissions as far as practicable
- Ensure equipment and facilities are setup to operate as efficiently as possible, and evaluate all changes in terms of the environmental impact they will have
- Ensure that our suppliers manage their environmental impact according to standards acceptable to Tyman
- Speak up promptly if you observe or become aware of failures against our environmental standards

Need Help?

- Speak to your line manager, team leader, divisional sustainability leader or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Take responsibility for reducing our environmental impact.



Why this matters

Tyman values a strong and healthy relationship with the communities where we operate. We strive to make a positive impact on our communities, not only because it is the right thing to do, but because it helps attract people who share our values and makes our people feel proud to be part of Tyman.

What I need to know

- Tyman supports local community investment programmes that create a positive impact, provided these are properly authorised
- Tyman is committed to ensuring our operations do not negatively impact our local communities
- Tyman does not make political donations (financial or resources)

Make it happen

- Seek permission before volunteering for charitable or community activities on behalf of our companies
- Ensure that company funds committed to charitable or community causes are properly authorised
- Be careful that any organisation being supported has values consistent with our own and is not going to damage our reputation
- Do not use company funds, facilities, assets or work time to support political candidates, parties or other political efforts
- Ensure that any personal contributions to civic or political activities do not suggest the involvement of any Tyman company
- Minimise nuisance we could be causing in our local community, for example noise or traffic

Need Help?

- Speak to your line manager, team leader, local HR manager or local Integrity Champion
- If you need to escalate, contact a member of the Tyman leadership team or contact **SpeakUp**

More information

- Ask your local management about policies that affect your work area
- See our “Integrity in Action” site for further guidance and examples

Protect and enhance our reputation in our local communities.



Glossary

Antitrust/Fair Competition

Antitrust and fair competition laws support freedom of competition and prohibit companies and individuals from acting in ways that co-ordinate commercial behaviours and harm the free market. Such laws aim to allow consumers to access the best goods at the best prices, and to reward the most efficient companies.

Bribe

Giving, offering or promising anything of value, with the intent that the recipient shall improperly perform their duties so the giver gains a business advantage.

Company assets

Company assets include all physical assets (e.g. facilities, machinery, IT equipment, supplies and inventory), intellectual property, commercially valuable information and company funds (e.g. cash, company credit cards, and documentation such as invoices that represents funds transactions), whether belonging to Tyman or entrusted to Tyman.

Conflict of interest

A conflict of interest is a situation in which an individual has competing personal and work interests or loyalties; if you think you are, or might be, in such a situation, talk to your manager.

Export controls

Laws restricting the export or transfer to foreign nationals of certain goods, services and know-how without appropriate license and consents.

Facilitation payment

A small (unofficial) payment (or transfer of value) to a government official to expedite

an administrative process – also called ‘speed payments’ or ‘grease payments’. Most anti-bribery laws consider facilitation payments as bribes. At Tyman, we take this stance in all the countries where we operate irrespective of local laws and customs.

Facilitating tax evasion

Facilitating tax evasion is a corporate criminal offence and occurs when a company’s employees, agents or service providers acting on its behalf deliberately and dishonestly help a third party taxpayer avoid tax.

Foreign national

A foreign national is a person who is not a citizen or permanent resident alien of the USA.

Inside information

Information that could have a material effect on our share price and which is not yet publicly available. Examples could include business results or forecasts for any part of the group; a product claim, incident or issue; major developments in litigation or in dealings with regulators; changes in executive directors; or significant restructuring acquisitions or disposals.

Insider dealing

Using inside information to buy or sell publicly listed shares – this is unlawful behaviour.

Integrity champions

Tyman employees who have been selected to formally assist in promoting and embedding our Code, its policies, principles and statements of value.

Intellectual property

Creations of the mind including new innovations and material improvements to existing designs or processes that we need to be protecting as a business. This also includes information that may give us a competitive advantage, such as trade secrets, design rights and other intangible industrial or commercial property.

Money laundering

Money laundering is the process of concealing the proceeds of money that was illegally obtained by making it appear legal through a series of transactions. Such funds are often diverted to fund terrorists and criminal organisations.

Personal data

Any information that relates to an identified or identifiable living individual. Examples include names, identification number, location data, IP addresses, photographs, video or audio recordings or anything that might relate to a person’s physical, physiological, genetic, mental, economic, cultural or social identity.

Processing personal data

The following are examples of “processing” personal data: storage, retrieval, deletion, amendment, securing, performing payroll functions, or marketing to.

Restricted information

Any information including software code, technical drawings, algorithms, manufacturing processes, sensitive commercial data that cannot be disclosed to people from certain countries without an export.

Sanctions

Political trade restrictions and travel bans put in place against designated countries, companies and individuals.

Speaking up

Being accountable for concerns and issues that we spot by telling someone or reporting through the various channels available within Tyman. It also includes praising colleagues for good work and sharing new ideas or perspectives.

Tax evasion

Illegal non-payment or under payment of tax.

Third party

A third party is any organisation or person that is not part of the Tyman Group, with which Tyman has established a formal business relationship. This includes but is not limited to suppliers, distributors, sub-contractors, agents, licensors, etc.

Trade controls

Trade controls refer to sanctions and any other laws that concern the import, export or re-export of goods, software or technology, including (without limitation) applicable customs regulations.

Tyman leadership

The Board, Executive Committee, Group Legal or any appropriate divisional or local leader, depending on the context.





