

## **Tyman 2019 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 2018 to address the risk of modern slavery and human trafficking being present in the Group's business and supply chain.

### **Tyman's 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 over 4,200 people and operates facilities in 18 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 2018 to ensure the prevention of modern slavery within our organisation**

#### ➤ 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.

Twenty-one Chinese and Taiwanese based suppliers have been formally audited by TSA personnel.

- Suppliers are assessed against multiple criteria incorporating CSR, SHE and quality management aspects.
- Suppliers are required to achieve a minimum threshold score to achieve or maintain approved supplier status.
- In addition to minimum overall performance, certain aspects of the audit plan are subject to "Red Flag" triggers. Failure to meet red flag audit requirements activates immediate escalation and corrective procedures, which can include suspension of approved supplier status.

Whilst a number of suppliers are actively working on improvement plans and actions in relation to overall audit criteria, no red flags were identified during the 2018 audit programme for Chinese and Taiwan based suppliers.

In addition to the formal audit process, suppliers are subject to ad hoc visits by TSA personnel, who have been trained to identify incidences of suspected modern slavery. No occurrences have been reported during the period.

During 2017 the British Standards Institute ("BSI") Supply Chain Services and Solutions team conducted a CSR audit of ERA's Indian based supplier, to assess compliance against potential risks identified as present within this geographical territory, as well as overall compliance with CSR policies.

This process identified a number of non-conformance requiring improvement, though none that triggered the red flag threshold. A subsequent improvement plan was established with the supplier and a further follow up audit was conducted in May 2018 to measure and assure effective progress.

Further improvements were required in a number of operational areas but continued compliant performance was identified in the areas of prevention of child labour, young labour, forced labour and harassment and abuse.

## ➤ 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.

In the ERA Division modern slavery training was delivered to all personnel operating in positions where a potential risk of exposure to persons suffering from such abuse was identified. This included personnel managing recruitment processes for permanent and temporary labour and supplier and contractor management.

A review of personnel will be conducted in 2019, including all ERA operated sites within the UK, with further training being provided as appropriate. A further exercise is planned with all ERA managed suppliers of good and services, with a requirement to confirm acknowledgment and acceptance of ERA's Modern Slavery & Human Trafficking Policy to declare their preparedness to meet legislative and policy requirements.

In the AmesburyTruth and SchlegelGiesse Divisions staff training is 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.

## **2019 planned activity**

The formal audit programme will continue and will incorporate suppliers acquired during 2018. In addition to both formal audits and ad hoc visits, modern slavery and additional CSR critical compliance requirements will be cascaded through the supply chain tiers, initially through a communication, declaration and demonstration of the compliance programme.

Newly acquired suppliers will be subject to an initial CSR inspection by senior TSA personnel. Any red flag non-compliance identified during these surveillance inspections will be managed in accordance with standard procedures, which could result in suspension of the supplier, if deemed necessary.

Activity in 2019 will be reported in the Group's 2020 Statement on Modern Slavery.

Jo Hallas

**Chief Executive Officer**

1 April 2019