

## Tyman Trade Controls Policy

Tyman is committed to complying with laws that govern the cross-border trade in goods, services, information and technology, including what can be imported and exported, and with which entities and individuals we can deal, with reference to sanctions and restricted end-uses (**Trade Controls**). We recognise that Trade Controls are complex and take many forms. Furthermore, we recognise that there are many who are incentivised to breach Trade Controls and seek to conceal such breaches. We recognise that breaching Trade Controls may result in serious consequences for our business and individuals. For these reasons, we seek to be vigilant in addressing Trade Controls risks.

The Group Chief Executive has overall accountability for Trade Controls compliance across Tyman's global operations and the General Counsel & Company Secretary is responsible for keeping this policy up to date and advising on the strategic direction for the Group's Trade Controls compliance programmes and goals, including the Group's response to any conflicting regulations. Each division President is responsible for compliance with Trade Controls within their business, including providing effective leadership, allocating requisite resources and ensuring the requirements of this policy are met.

Compliance with Trade Controls is a collective responsibility and leaders at all levels are expected to engage their teams to identify areas of risk, embed best practice and determine opportunities for further improvement. Every Tyman employee is responsible for following the Group's control processes and reporting any relevant concerns to their line manager/supervisor.

All Tyman businesses commit to:

- Carefully assessing the Trade Controls risks of every: transaction (including the transportation of goods) or project undertaken; product developed or sold; transfer or disclosure of technical information; or hiring or staffing decision
- Implementing robust procedures to address such Trade Controls risk including appropriate disciplinary and other measures in response to any breach or potential breach of Trade Controls
- Undertaking rigorous risk-based due diligence to identify the areas of the business that may, directly or indirectly, engage with restricted persons, parties, countries or regions before engaging with such persons, parties, countries or regions
- Obtaining enforceable contractual commitments to comply with Trade Controls from their suppliers (including carriers), customers, distributors and agents (**Counterparties**)
- Continuously monitoring their Counterparties and, on a risk-based approach, regularly reviewing due diligence on such Counterparties and conducting audits on their compliance with Trade Controls
- Obtaining appropriate licences from the relevant authorities prior to the export or re-export of goods, information or services
- Training all relevant employees to understand the Trade Controls that they will encounter in their roles
- Seeking expert advice as appropriate to ensure compliance with all applicable requirements and standards
- Keeping appropriate records, in a form accessible by auditors or regulators on request