

Fair Competition Policy

Tyman is committed to conducting our business with honesty and integrity, and we expect all our workforce and business partners to maintain the highest standards. We support strong laws that enable open and fair markets and will not tolerate anti-competitive agreements or abuse of our position in any market.

The Group Chief Executive has overall accountability for our Fair Competition Policy across Tyman's global operations. Each division President is responsible for implementing the policy in their business, including providing effective leadership, allocating requisite resources and ensuring the requirements of this policy are met.

The success of this policy is a collective responsibility and leaders at all levels are expected to engage their teams to set the appropriate tone from the top, identify any key areas of risk, address opportunities for improvement and recognise good practices. Every Tyman employee is responsible for following The Tyman Code and for identifying, addressing or reporting any potential or actual non-compliance to this, whether witnessed or experienced.

All Tyman businesses commit to:

- Providing comprehensive training on fair competition matters to employees in commercial roles (including sales, marketing and purchasing teams) and affording adequate opportunity for discussion about current practices and processes to ensure there is no potential for breaches
- Raising general awareness about our Fair Competition Policy and providing guidance on cooperating with regulators (e.g. dealing with "dawn raids", etc.) amongst our workforce through training and other events, and maintaining appropriate records of such training or events
- Ensuring that all our business partners respect our values, know the standards of behaviour we expect and are made aware of our Fair Competition Policy
- Implementing controls that ensure that they do not directly or indirectly:
 - enter into any anti-competitive agreements with Tyman's competitors (e.g. allocate markets, bids or quotes; agree pricing on products, etc.)
 - provide Tyman's confidential or sensitive information to competitors
 - receive our competitors' confidential or sensitive information, whether verbally or otherwise
 - gain any unfair advantage by accessing, stealing or copying any competitor's product or data (including customer data)
 - impose on or agree with distributors illegal restrictions (e.g. controlling resale price; illegally restricting territories or channels in which they may sell Tyman products and the extent to which they may sell competing products, etc.)
- Maintaining appropriate written procedures that regulate interactions with competitors and trade associations; requiring records of all such interactions and clear records of sources of competitor information so that the legitimacy of such information is beyond doubt
- Reporting any breaches or potential breaches of this policy to the Group General Counsel & Company Secretary (GCCS), or consulting the GCCS if ever in doubt
- Cooperating with competition authorities while consistently and robustly defending any legitimate interests with the help of the GCCS