

Anti-Bribery & Corruption Policy

Tyman is committed to conducting our business with honesty and integrity everywhere it does business around the world, and we expect all our employees and business partners to maintain the highest standards of ethics. We have a zero-tolerance policy towards bribery and corruption (including facilitation payments and non-monetary incentives) and prohibit any form of it in connection with our business.

The Group Chief Executive has overall accountability for our Anti-Bribery & Corruption 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 anti-bribery and corruption 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 Anti-Bribery & Corruption Policy 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, are made aware of our Anti-Bribery & Corruption Policy and are party to appropriate contractual obligations to comply with the policy
- Implementing controls that ensure that they do not (whether to or from any person or company, wherever situated and whether or not a public official or private person or company) directly or indirectly:
 - Offer, promise or give bribes or facilitation payments
 - Request, agree to receive or accept any bribes or facilitation payments
- Maintaining appropriate and auditable procedures that regulate the giving and receipt of gifts, hospitality and entertainment, which should be reasonable and proportionate and within clearly-defined local guidelines (or require pre-approval), and should also be recorded in a timely fashion on a gift and hospitality register
- Maintaining appropriate and auditable procedures that regulate the making of charitable contributions and sponsorships so that they are not used as a cover for bribery and corruption
- Ensuring that they do not make any contributions of any form to political parties, organisations, factions, movements, public or private entities whose activities are linked with any political activity – all such contributions are strictly prohibited
- 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 regulators while consistently and robustly defending any legitimate interests with the help of the GCCS