



Tyman 2020 Statement on Modern Slavery

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015 and was approved by the Board of Tyman plc on 15 October 2020. It describes the actions taken by Tyman plc and its subsidiaries (together, the "**Group**") during the financial year ending 31 December 2019 to address the risk of modern slavery and human trafficking being present in the Group's business and supply chain.

This statement has been published later than usual, and in line with the six-month extension granted by the UK Government, because of the impact of the Coronavirus and pressure on staffing resources required to verify the steps taken in 2019.

Tyman's business

Tyman plc is a leading international supplier of engineered fenestration components and access solutions to the construction industry. The Group designs and manufactures products that enhance the comfort, sustainability, security, safety and aesthetics of residential homes and commercial buildings. Tyman's portfolio of leading brands serve their markets through three regional divisions – in North America (AmesburyTruth), in the UK and Ireland (ERA) and Internationally (SchlegelGiesse). Headquartered in London, the Group employs approximately 3,900 people, with facilities in 18 countries worldwide.

Supply chains

Each Division is responsible for the management of its own supply chain, the contractual terms it enters into with its suppliers and for ensuring adherence with the anti-slavery provisions within such contractual terms. Risk assessments of the supply chains are carried out at a divisional level and progress made is reported to the Company Secretary.

The Group's combined supply chain encompasses over 2,000 suppliers, including suppliers to Tyman Sourcing Asia ("**TSA**"), which is responsible for managing 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 (direct material supply), as well as services (indirect supply) such as accounting and IT services.

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 enable equal opportunities and non-discrimination, and that comply with relevant local legislation and accepted codes of employment practice that ensure that the provision of labour is freely given.

Furthermore, 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 2019 to ensure the prevention of modern slavery within our organisation

Supply chain risk

The Group's greatest risk of exposure to modern slavery is through its supply chain. To ensure that Tyman's suppliers operate to the highest standards, the Divisions carry out risk-based audits, which include on-site visits or assessments against supplier completed questionnaires, prioritising those based in the Far East.

Audit methodology

- Suppliers are assessed against multiple criteria incorporating CSR, environment, health and safety, quality management and capability.
- 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.

2019 audit programme and questionnaire assessments

Over fifty suppliers based in China, Taiwan and India serving the Divisions, were formally audited by TSA personnel in 2019. The 2019 audit programme included five Indian suppliers, new to the Group, as a result of the acquisition of Zoo Hardware in 2018. One non-conformance was identified, relating to an inadequacy of formal policies relating to staff welfare, and a corrective action plan has been implemented. No breaches of employment or slavery legislation were identified during the audit programme.

In addition to the formal audit process, suppliers continue to be subject to ad-hoc visits by TSA personnel, who have been trained to identify incidences of suspected modern slavery. No occurrences had been reported during the year. Modern slavery requirements are also audited during supplier visits undertaken by TSA quality inspectors as part of its ISO 9000 programmes.

ERA and SchlegelGiesse's suppliers for goods and services were issued with an assessment questionnaire to ascertain their awareness of, and steps taken to prevent modern slavery and human trafficking within their operations and supply chains. Improvement actions required by a small number of low risk component suppliers in the UK were identified through this process and are being tracked for completion by ERA.

TSA's suppliers were issued with updated policy requirements to continue the development of their understanding of and compliance with anti-slavery and human trafficking requirements throughout their own supply chains.

Supplier Contractual Terms

In addition to audits and supplier risk assessments, the Group's Divisions also use contractual terms with its suppliers to address modern slavery and human trafficking risks. In the US, formal language was incorporated into existing agreements with AmesburyTruth's top tier suppliers to address modern slavery risks. Similar arrangements were also rolled out across SchlegelGiesse's direct and indirect suppliers. This work was followed up with either an addendum to an existing agreement, a revised agreement, or a signed acknowledgement of compliance. This process is currently being expanded to cover suppliers to Bilco and Ashland and will be completed in 2020. Purchase orders with revised wording, covering anti-slavery and human trafficking are now in place.

Training and Awareness

Modern Slavery Awareness training continues to be delivered during the year, with a focus on personnel most likely to come across modern slavery and human trafficking. This includes those personnel responsible for supply chain management and supplier evaluation, recruitment of staff and those managing sub-contractors.

Team members who had previously received training participated in refresher training to maintain their awareness of this important issue.

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 wrongdoing and/or malpractice at work either through contacting a relevant senior manager or via one of the Group's independent whistleblowing services, through which they may voice their concerns anonymously. All cases are treated in the strictest of confidence and are fully investigated. No modern slavery or human trafficking cases were brought to the Group's attention through this mechanism in 2019.

2020 planned activity

The following activities will continue in the year ahead:

- Completion of actions arising from this year's supplier questionnaire assessment process;
- Finalisation of contractual arrangements for modern slavery and human trafficking for suppliers to Bilco and Ashland in North America and SchlegelGiesse's international operations;
- Further roll out of the formal audit programme, including an assessment of suppliers' policy and provision to manage anti-slavery and human trafficking within their own supply chains; and
- Monitoring and delivery of training requirements for all relevant staff.

Jo Hallas

Chief Executive Officer

15 October 2020