



## Tyman 2022 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 30 June 2022. It describes the actions taken by Tyman plc and its subsidiaries (together, the “**Group**”) during the financial year ended 31 December 2021 to address the risk of modern slavery and human trafficking being present in the Group’s business and supply chain.

### **Tyman’s business**

Tyman (TYMN: LSE) is a leading international supplier of engineered fenestration components and access solutions to the construction industry. The company 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 divisions: Tyman North America, Tyman UK and Ireland and Tyman International. Headquartered in London, the Group employs approximately 4,200 people with facilities in 16 countries worldwide. Further information is available at [www.tymanplc.com](http://www.tymanplc.com).

### **Group suppliers**

Tyman and its Divisions are committed to ethical and responsible manufacturing, and we uphold international labour standards as well as comply with local legislation. The Group’s greatest risk of exposure to modern slavery is through its supply chain.

The Group’s combined supply chain encompasses over 2,000 suppliers. 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.

In the Group’s federated operating model, each Division is responsible for the risk assessment and management of its own supply chain, the contractual terms it enters into with its suppliers and for ensuring adherence with any anti-slavery obligations. At least annually, the Divisions provide a report on their progress to the Group’s General Counsel & Company Secretary, who is also available to provide advice to them on such matters.

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. Tyman Sourcing Asia (“**TSA**”), which is responsible for managing the Group’s outsourced manufacturing and supply chain in the Far East, carries out a “200-point audit” on each new supplier as well as an annual review of the Group’s top 20 suppliers<sup>1</sup> in the Far East.

### **Human rights**

The Group is committed to respecting human rights across all our operations and takes very seriously any reports about breaches of human rights in relation to our supply chain. The Group fully supports the Modern Slavery Act 2015 and works with its Divisions to ensure that its activities and activities within the Group’s supply chains do not infringe or encourage abuses of any human rights.

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<sup>1</sup> These are the 20 suppliers that the Group spends most with or that represent the greatest risks to its business.

The Group is mindful of its obligations under US Federal laws that prohibit the importation into the USA of any goods produced or manufactured, wholly or in part, in any foreign country, by either convict, forced or indentured labour. Following reports of forced labour in the Xinjiang Uyghur Autonomous Region (“XUAR”), the Group confirms that it does not source products from the XUAR.

### **Code of Business Ethics**

The Group’s Code of Business Ethics: “Integrity in Action” (the “CoBE”) was deployed across the Group and adopted by Divisional management in 2021. The CoBE is a cornerstone document of the Group’s Business Ethics & Compliance Programme. It describes the Group’s purpose, values and culture of integrity, which helps Tyman employees make ethical decisions across all of its businesses every day.

The CoBE was deployed through workshops using a standardised approach to their conduct, which was developed to ensure that the CoBE material and messages would be consistently communicated to all employees. At each such workshop with the support of a video message from the Group’s Executive Committee, the participants discussed the Group’s purpose and values before discussing how the CoBE would help the Group and each of its individual stakeholders achieve their ethics goals. The workshop facilitator then demonstrated how each participant could use an “Integrity Check Tool” to help them consider and deal with ethical dilemmas before the participants were given opportunities to work through scenarios that they might encounter in their roles.

Human rights and modern slavery is one of the key topics covered in the CoBE. The CoBE explains the Group’s firm stance on respecting human rights and its opposition to any forms of discrimination, physical or verbal abuse, harassment or intimidation. It also reinforces our commitment to preventing modern slavery, child labour, human trafficking, among other human rights abuses, whether directly or indirectly in our supply chains.

In the CoBE, each employee is requested to:

- Ensure that all employees and anyone who works with us does so freely and safe from abuse
- Diligently support human rights due diligence for any business partner Tyman is looking to engage
- Speak up if they suspect that anyone’s human rights are being hurt in connection with our business, whether directly or indirectly

### **Ensuring prevention of modern slavery within our supply chains**

In addition to the comprehensive deployment of the CoBE, the following steps have been taken in 2021 to prevent modern slavery in the Group’s supply chain.

#### TSA audits

TSA undertakes supplier audits using the following methodology:

- Suppliers are assessed against “CSR” criteria (which includes compliance with applicable laws, the prohibition of child labour, forced labour or compulsory labour and conflict minerals as well as adherence to practices that are consistent with care for the environment, the provision of safe and healthy working environments) and 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 would activate immediate escalation and corrective procedures, which can include suspension of approved supplier status.

In 2021, TSA conducted 20 audits on behalf of the UK & Ireland and North America divisions. It did not identify any red flag non-conformances pursuant to those audits. TSA is in the process of extending its auditing activities and aims to audit all Group suppliers at least every 2 years on their commitments to compliance with labour laws, human rights and the use of conflict minerals.

#### Supplier qualification scorecard

During the period, the Group’s North America division rolled-out a supplier qualification scorecard in North America and also partnered with Assent Compliance, a leading provider of supply chain sustainability management solutions, to improve the efficiency of its supplier due diligence processes, particularly with respect to anti-slavery and human trafficking as well as conflict minerals.

#### Written declarations from suppliers

Each division, whether directly or through TSA, also obtained written declarations from most of their suppliers that they would respect internationally recognised human rights, treat their employees with dignity and respect, not tolerate threats of violence, sexual exploitation, abuse or verbal or psychological harassment, not accept forced labour and ensure that the safety of their work environments comply with any applicable laws or codes of practice. The Divisions continued to seek such declarations from their suppliers in 2022 if they had not been received at the end of 2021.

TSA required the Group’s Tier 1 suppliers in China and Taiwan to sign updated statements to reaffirm their understanding of and compliance with anti-slavery and human trafficking requirements throughout their own supply chains. Moreover, those Tier 1 suppliers were asked to contact their suppliers to obtain similar signed commitments to anti-slavery and human trafficking requirements.

#### Supplier Contractual Terms

In addition to audits and supplier risk assessments, the Group’s Divisions – whether directly or through TSA - also use contractual terms with its suppliers to address modern slavery and human trafficking risks.

The Group’s North America division incorporates formal language into its existing agreements with its top tier suppliers to address modern slavery risks. Similar arrangements are also in place for the UK & Ireland and International divisions’ direct and indirect suppliers. The expansion of this process to cover suppliers to the Bilco and Ashland businesses in the North American division is ongoing.

#### Training and Awareness

Through various modes, including online training, 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. Such personnel include those responsible for product quality control, supply chain management and supplier evaluation, recruitment of staff and those

managing sub-contractors onsite. In 2021, refresher training was conducted for staff who had previously completed the training.

### 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 compromises of human or employment rights at work either through contacting a relevant senior manager or via the Group's independent whistleblowing service, through which they may voice their concerns anonymously if permitted by local law. 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 2021.

### **2022/2023 planned activities**

The following activities are planned for the year ahead:

- Completion of actions arising from 2021's supplier questionnaire assessment process;
- TSA obtaining from the Group's Far East suppliers' reaffirmations of their commitments to anti-slavery and human trafficking;
- Extension of the 200-point audit checks to more of the Group's existing suppliers on a two-year rolling plan as well as at every new supplier in the Far East;
- Establishment of a Group policy on Human Rights and Working Conditions;
- Further deployment of compliance tracking software to improve the efficiency of the Group's supplier due diligence processes in respect of conflict minerals and anti-slavery and human trafficking;
- Cross-Divisional collaboration to share and develop best practice on supplier due diligence, management and audit; and
- Continued awareness building.

Jo Hallas

**Chief Executive Officer**

30 June 2022