

Conflicts of Interest Policy

We all have a duty to act in the best interests of Tyman. When competing interests impair, interfere with, or appear to interfere with our ability to make objective, unbiased business decisions we have a conflict of interest, which may impair our judgement.

This Conflicts of Interest Policy seeks to help all relevant persons better identify, disclose and appropriately manage conflict of interest risks, thereby helping to maintain our reputation for leading with integrity and building trust across all stakeholders.

The Chief Executive Officer is responsible for keeping this policy up to date and ensuring the requirements of this policy are met. "relevant persons" including employees, officers, board members, consultants, interns, agency workers and contractors of the Tyman Group ("Tyman" or the "Group"). It does not form part of any employee's contract of employment and we may amend it at any time.

Conflicts of Interest

A "conflict of interest" arises when a relevant person's personal, social or financial interests interfere, or may be perceived to interfere, with that individual's ability to act in the best interests of Tyman. Conflicts of interest can be actual, potential, or perceived. They may include (without limitation):

- Having a personal or financial relationship with a competitor, customer, business partner, supplier or prospective employee – directly or via a family member
- Outside employment that may either compete with or impact activities of Tyman, or which may limit your ability to fully execute your responsibilities for Tyman
- Directly or indirectly trading assets with any part of the Group, including leasing or selling personal property or assets to Tyman
- Use of Tyman resources (including information, facilities, equipment or personnel) for non-Tyman activities
- Having a family relationship that could create the appearance of a conflict, or any romantic or any sexual relationship with a Tyman co-worker
- Seeking external opportunities for ideas or inventions developed through your Tyman time, resources and/or expertise
- Receipt of a gift from a supplier that makes you feel obligated to give them work

A "family member" means any spouse, domestic partner, parent, sibling, child or other relative who resides in the same household, and any other familial relationship.

Disclosure

As an employee of the Group, you are expected to lead with integrity in all of your business relationships, both inside and outside the Group. As part of this commitment, we must all disclose and ethically handle actual or potential conflicts of interest involving the Group. Most Conflicts of Interest when disclosed in a timely basis can be transparently and fairly managed.

When deciding what situations or relationships should be disclosed, consider how the situation or relationship would appear to someone not involved, whether that be a coworker, a supervisor or even someone outside the company. If an outsider would think that situation or relationship was tainted by favouritism or any apparent or actual conflict of interest, then the situation or relationship must be disclosed. If you are not sure whether a situation or

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relationship presents a conflict, you should disclose it. Full disclosure will protect both yourself and Tyman.

Resolving Conflicts

After you have disclosed a conflict of interest, your manager and HR will collaborate with you and/or your team to create appropriate controls, which will vary depending upon the particular facts, and record such conflict and its management in a register (the **Conflicts of Interest Register**). It will be your responsibility to notify your manager and Divisional HR of any changes in circumstances so that they can update the Conflicts of Interest Register and/or controls.

In some instances, any risk to Tyman's interests may be sufficiently remote so the Group will only need to remind you to guard against inadvertently disclosing the Group's confidential information. In other situations, stronger controls may be required, such as removing a person from a position of decision-making authority with respect to the situation or relationship.

Non-compliance

While it is assumed that you and all of our colleagues endeavour to work free of conflicts of interest, they happen regularly. Your awareness of this policy will help you adhere to Tyman's requirements and fulfil your duty to act in the best interests of Tyman. You must understand that failure to comply with this Policy will put your work circumstances and even your very employment at risk; depending on the severity of the situation, this may result in progressive corrective action or immediate separation from Tyman.

Where to go with questions or concerns?

You may wish to discuss any questions or concerns that you may have with your line manager or local Integrity Champion or your HR department in the first instance. If you still have any questions or concerns that remain unresolved following such discussion, please contact the General Counsel & Company Secretary.