

Anti-Modern Slavery Policy

Overview

“**Modern slavery**” is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Tyman is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Purpose of policy

The purpose of this policy is to: (a) set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery; and (b) provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery.

Scope of policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. However, it does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibilities

The Group Chief Executive has overall accountability for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Each division President is responsible for: (a) implementing the policy; (b) monitoring its use and effectiveness; (c) dealing with any queries about it; (d) auditing internal control systems and procedures to ensure that they are effective in countering modern slavery; and (e) ensuring that management at all levels understand and comply with the policy, and are given appropriate and regular training on it and the issue of modern slavery in supply chains.

The avoidance and eradication of modern slavery is a collective responsibility and leaders at all levels are expected to engage their teams to identify areas of risk, embed best practice and determine opportunities for further improvement. Every Tyman employee is responsible for following the Group's control processes and reporting any relevant concerns to their line manager/supervisor.

Anti-Modern Slavery Policy

All Tyman businesses commit to:

- Carefully assessing the modern slavery risks of their supply chains
- Implementing robust procedures to address such modern slavery risk including appropriate disciplinary and other measures
- Undertaking rigorous risk-based due diligence to identify the areas of the business that may, directly or indirectly, engage with suppliers that may have modern slavery in their supply chains
- Communicating our commitment to addressing the issue of modern slavery in our business and supply chains to all our suppliers, contractors and business partners at the outset of our relationship with them and reinforcing this communication on an ongoing basis
- Obtaining enforceable contractual commitments to comply with anti-modern slavery laws from their suppliers, allowing Tyman to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy
- Seeking expert advice as appropriate to ensure compliance with all applicable requirements and standards
- Keeping appropriate records, in a form accessible by auditors or regulators on request

Speaking up

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, please raise it with your manager or Tyman's General Counsel & Company Secretary through www.tymanspeakup.com.