



Tyman 2021 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 20 May 2021. It describes the actions taken by Tyman plc and its subsidiaries (together, the “**Group**”) during the financial year ended 31 December 2020 to address the risk of modern slavery and human trafficking being present in the Group’s business and supply chain.

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 4,300 people, with facilities in 16 countries worldwide.

Supply chains

Tyman and its Divisions are committed to ethical and responsible manufacturing, and we uphold international labour standards as well as comply with local legislation.

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 the anti-slavery provisions within such contractual terms. 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.

The Group’s combined supply chain encompasses over 2,000 suppliers, including many that are managed by 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.

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 recent reports of forced labour in the Xinjiang Uyghur Autonomous Region (“**XUAR**”), the Group confirms that it does not source products from the XUAR.

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 will work 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.

Code of Conduct

The Group's Code of Conduct, which has been adopted by Divisional management, sets out the minimum standards of behaviour and business practices expected from everyone within the Group.

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 2020 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.

In 2020, TSA conducted 19 audits on the Group's suppliers that were most vulnerable to modern slavery risks on behalf of ERA and AmesburyTruth. It did not identify any red flag non-conformances pursuant to those audits.

AmesburyTruth, ERA and SchlegelGiesse 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 2021 if they had not been received at the end of 2020.

TSA issued the Group's Tier 1 suppliers in China and Taiwan 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 USA, 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 ERA and 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. The expansion of this process to cover suppliers to Bilco and Ashland in the USA is ongoing.

The Group also uses purchase orders with clauses that cover anti-slavery and human trafficking.

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. 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 2020, ERA completed its roll-out of online training, which had begun in 2019.

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 2020.

2021/2022 planned activities

The following activities are planned for the year ahead:

- The Code of Conduct will be replaced by a new, engaging Code of Business Ethics called "Integrity in Action", which was collaboratively developed by a cross-divisional and cross-functional team. The Code of Business Ethics, which also features respect for human rights and the prevention of modern slavery, child labour and human trafficking throughout our supply chains as an important topic, will be deployed across the Group in 2021 and supported by training sessions covering all employees;
- Completion of actions arising from 2020's supplier questionnaire assessment process;
- Rolling out a supplier qualification scorecard in North America;
- Finalisation of contractual arrangements for modern slavery and human trafficking for suppliers to Bilco and Ashland in North America, which will be facilitated by the implementation of compliance tracking software;

- Strengthening the anti-modern slavery and human trafficking clauses in the contracts used by SchlegelGiesse;
- Adaption for virtual delivery and then further deployment 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;
- Monitoring and delivery of training requirements for all relevant staff, including the refreshment of training for staff who had already completed the training;
- Cross-divisional collaboration to share and develop best practice on supplier due diligence, management and audit; and
- Continued awareness building, such as by using UN International Days related to slavery, human trafficking and child labour, which include the World Day Against Child Labour and the International Day for the Abolition of Slavery.

Jo Hallas

Chief Executive Officer

20 May 2021