

## **Modern Slavery Statement - Transparency in Supply Chains**

This statement has been published in accordance with section 54 of the Modern Slavery Act 2015. It describes the actions taken by Tyman plc and its subsidiaries (together the "Group") during 2016 to address the risk of modern slavery and human trafficking being present in the Group's business and supply chain.

### **Our business**

Tyman plc is a leading international supplier of engineered components to the door and window industry. The Group's three Divisions – AmesburyTruth, ERA and Schlegel International – are market leaders in their respective geographies. The Group employs over 3,500 people and operates facilities in 19 countries worldwide.

### **Supply chains**

Each Division is responsible for the management of its own supply chain, the contractual terms entered into with suppliers and for ensuring adherence with the anti-slavery provisions within contractual terms. Risk assessments of the supply chains have been carried out at a divisional level, with progress made being reported to the Group Board.

The Group's combined supply chain encompasses over 2,000 suppliers and includes suppliers to Tyman Sourcing Asia, which is responsible for 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.

### **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 Board of Tyman plc has approved a Code of Conduct, that 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 make provision for equal opportunities and non-discrimination, and that comply with relevant local legislation and accepted employment practice codes which ensure that the provision of labour is freely given.

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 to ensure the prevention of modern slavery within our organisation**

### **1. *Due diligence and audits of suppliers***

The Group's greatest risk of exposure to Modern Slavery is through our supply chain. In order to ensure our suppliers operate to the highest standards, we carry out risk based checks which normally include on-site visits or written assessments. The types of checks undertaken by the Divisions during 2016 included:

- Compliance audits of major suppliers located in those geographies considered to have an elevated risk of modern slavery.

These checks include reviewing welfare policies and contracts of employment with a particular focus on any indications of forced labour, under age working, and human trafficking. On site visits incorporated physical inspections of working conditions and welfare facilities, including staff dormitories, where applicable;

- In geographies not considered to have an elevated risk of modern slavery, suppliers have been subject to written assessments to confirm adherence to the relevant Divisional policy; and
- Divisions have also amended their due diligence procedures prior to the approval of new suppliers.

### **2. *Contractual control***

All Group companies include anti-slavery provisions in their Master Service Agreements and Contract Terms. During 2016 several existing supplier contracts were amended to include these provisions with the intention being that all Tyman supplier agreements will have these or similar provisions by the end of 2017. Where it is not possible for our standard terms and conditions to be used, suppliers will be required to confirm in writing that they understand our requirements and comply with them.

### **3. *Training***

We expect all Group employees to respect human rights and to treat people fairly within our operations. The Tyman Code of Conduct details the minimum standards expected of each employee whatever their role and wherever they are located.

All staff who have been identified as being exposed to the relevant elements of the supply chain have received training, covering awareness, identification and reporting of suspected occurrences of modern slavery or human rights abuses.

## **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 our employees and those working for, or on behalf of the Group are encouraged to report any form of wrong doing and/or malpractice at work either through contacting a relevant senior manager or via the independent whistleblowing service, through which they may voice their concerns anonymously. All cases are treated in the strictest of confidence and are fully investigated.

## **Progress in the year ahead**

Work will continue during 2017 to improve the depth of understanding of this issue within the Group and with our suppliers. We will seek to embed preventative measures more deeply within our processes, including the publication of a supplier Code of Conduct applicable to all Group suppliers and will continue our programme of:

- staff training;
- supply chain audit and verification, including a rolling programme of supplier checks;
- in depth review of those suppliers considered to be of a higher risk profile;
- on-going assessment of service providers' supply chain; and
- investigation and remedial action, if found to be required.

This Statement has been reviewed and approved by the management board of the Group's Divisions.

This statement is made in respect of the financial year ended 31 December 2016 and was approved by the Board of Tyman plc on 12 May 2017.

Louis Eperjesi  
**Chief Executive Officer**  
May 2017