



Tyman plc Code of Conduct

Tyman plc is a leading manufacturer and supplier of engineered components to the door and window industry, with businesses around the world. Through these businesses we aim to operate in a responsible and respectful way towards the people, environment and laws and regulations of the countries in which we operate as well as to internationally accepted standards of responsible business conduct.

We expect everyone who works for Tyman and its Divisions to act responsibly and to maintain the highest standards of integrity, honesty and respect.

Each of the Group's Divisions operates in accordance with its own policies and procedures, which are consistent with the principles/values set out in this Code.

This Code of Conduct has therefore been written to cover the overarching principles by which every employee working in the Tyman Group is expected to behave and how we expect our customers, suppliers and other stakeholders to operate at an equivalent standard as those we expect of our employees.

Operating with Integrity

The Group seeks to be honest and fair in its relationships with customers and suppliers and to source and supply goods and services in an efficient manner, in accordance with specifications, without compromising quality and performance.

Each Division is responsible for negotiating the terms and conditions of trade with suppliers. In doing so each division is expected to maintain high standards of integrity in all business dealings with suppliers and is encouraged to use the services of those suppliers whose values and standards are equivalent to our own.

Business Ethics, anti-corruption and compliance

The group is committed to conducting its business with integrity. High standards of professional and ethical conduct are expected throughout its operations acting in compliance with the laws and regulations in jurisdictions in which the Group operates. Employees and persons acting on behalf of the Group are expected to implement the Group's policies and procedures such that the legitimate interests of the Group are advanced, having regard to the Group's values and standards. All employees are expected to engage in ethical conduct, including;

- The avoidance and reporting of any conflicts of interest
- Preventing the misuse of confidential data for any unauthorised purpose
- Ensuring all applicable laws and regulations are upheld
- Preventing any form of bribery, fraudulent or corrupt practices
- Preventing any form of discrimination or harassment
- Promoting a safe and healthy working environment

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- Ensuring all customers are treated fairly, openly and honestly
- Conducting business relationships with suppliers with a high level of integrity and ensuring preferred suppliers are those who operate with the same values and standards as those held by the Group

The Group supports and encourages employees to report any incident or suspicion of any form of malpractice. Employees may discuss their concerns with their line manager, divisional CEO, or the Group Company Secretary and feel confident in disclosing a concern, in good faith, if they have a reasonable belief that wrongdoing has been committed, is in the process of being committed, or is likely to be committed. However, it is recognised this is not always possible owing to perceived or real conflicts of interest or the wish to remain anonymous, therefore all employees may contact an independent whistleblowing service, through which they may voice their concerns anonymously, 24 hours a day, 365 days a year. Full details are shown on page 5.

Gifts, entertainment and hospitality

As a global business the Group recognises the practice of giving and receiving business gifts varies between countries and therefore reasonable gifts, entertainment and hospitality is acceptable in the course of building good business relationships with customers and suppliers.

To support this, all divisions are required to have in place and to proactively manage their own hospitality policies and procedures, as a part of which all employees are required to accurately record the details of any gifts and hospitality given or received in relation to the business of their company.

Gifts that could affect either party's impartiality or influence a business decision or that could lead to the improper performance of their official duty is prohibited.

Respect for People

Every Tyman employee has the right to work in an environment that supports diversity and fosters a culture of dignity and 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.

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.

Health and Safety

Providing a safe environment in which our employees can work is a key priority for the Group. The Group is therefore committed to ensuring a safe, clean and healthy working environment for all employees, customers and other persons with whom the Group has contact.

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The Group actively promotes a strong health and safety culture and encourages the collective pursuit of continuous improvement in health and safety standards across all operations.

Every Tyman employee needs to take every reasonable precaution in and around their workplace to avoid injury to themselves, their colleagues and any members of the public and to comply with the Divisional Health & Safety Policies.

Training, development and retention

Tyman supports the continuing professional development of all its employees. Where appropriate, skills development training is provided to employees to enable them to perform their duties and to facilitate career progression opportunities.

Human rights

The Group is committed to respecting human rights across all our operations and therefore 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 the Group's activities and activities within its supply chain do not infringe or encourage abuses of any human rights.

Community

The Group understands the importance of being a contributing member of society and ensures that we conduct our activities, so far as possible, in a sensitive manner, being mindful of local social and cultural traditions.

Each operating unit is responsible for managing its contribution to the social and economic wellbeing of the communities in which it operates, and encourages employees to participate in projects that strengthen their relationships with the local community.

Data & Communications

The Group recognises that many employees engage in social media activity while off duty. However, employees who do so must be mindful that their social media activity, even if done off premises and while off-duty, could be mistaken as being representative of the Group.

All employees are personally responsible for whatever they publish on-line and must therefore ensure it is made clear that any postings are their own and not representative of the Group or any group company. The Group recognises that although Social Media Policies provide guidance on responsible social media activity by employees these policies do not and cannot cover every possible social media activity and therefore the Group relies on the common sense and good judgment of its employees to ensure that social media activity is undertaken responsibly.

The Group is aware that every business is reliant on data in whatever form and the need to keep this safe from misuse. All data held within the Group must be processed fairly and lawfully, processed only for its intended purpose, stored securely and only used for its proper purpose without transferring it to third parties without appropriate authority and protection.

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Dealing with third parties

Tyman plc is listed on the London Stock Exchange and the Company and all group employees must comply with the relevant laws and regulations that govern this listing. All employees must be aware that company confidential information (Inside Information) must not be used to trade in Tyman plc shares. Employees will be informed/aware if they have been deemed an 'Insider' under the Company's share dealing policy.

However, if an employee is in any doubt as to whether they are in possession of inside information and wish to trade in the Company's shares they should contact the Group Company Secretary **before** undertaking any transaction. Any enquiry to the Group Company Secretary should be made at cosec@tymanplc.com.

In no circumstances should any member of staff, other than those specifically authorised to do so, divulge information to, or respond to enquiries from, any third party (for example, the press, analysts or shareholders) in relation to matters which may be considered company confidential or could potentially qualify as inside information.

All communications with the press, analysts, shareholders or other third parties should be conducted through authorised persons only, such as a divisional CEO or the Group's Executive Directors in respect of Group information.

Environment

The Group recognises its responsibilities as a manufacturing concern to continue to reduce the environmental impact of its activities.

The Group aims to develop and supply products to help customers meet their own environmental objectives and the demands of their customers and of government. The most significant areas of environmental impact associated with the Group's operations relate to manufacturing processes and the consequential environmental impact.

The Group encourages the continual improvement in the design, implementation and monitoring of environmentally efficient manufacturing processes. This includes monitoring the developments in alternative material sources which may reduce the environmental impact of products.

Through internal development and investment, operations across the Group are encouraged to:

- minimise energy consumption
- reduce waste generation through reuse and recycling
- make use of recycled materials where possible
- reduce transportation and their logistics-related carbon footprint, and
- reduce harmful emissions

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Whistleblowing - Reporting Breaches or Concerns



Any employee or any other person working for, or on behalf of the Tyman group of companies throughout the world who has a concern about any form of wrong doing and/or malpractice at work is encouraged to discuss this with an appropriate person within their organisation, such as their line manager, HR team or divisional CEO and feel confident in disclosing a concern, in good faith, if they have a reasonable belief that wrongdoing has been committed, is in the process of being committed, or is likely to be committed. However, it is recognised this is not always possible owing to perceived or real conflicts of interest or the wish to remain anonymous.

Therefore, all employees may contact an independent whistleblowing service, through which they may voice their concerns anonymously, 24 hours a day, 365 days a year.

All cases are treated in the strictest of confidence and are investigated fully.

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.