SUPPLIER CODE OF CONDUCT

Rev 25.01



“

The ability to identify a need, and then create a solution that redefines the norm of an entire industry – that’s what great engineering is all about.”

— CHRISTIAN WADELL, HEAD OF R&D AT TYRI —

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INTRODUCTION

At TYRI, our mission is to drive growth through the development of innovative, durable, and high-performance lighting solutions that meet the diverse needs of our global customers across industries. We are committed to backing our world-class products with exceptional customer support, ensuring long-term relationships built on trust and reliability.

Our dedication goes beyond lighting—TYRI is committed to protecting the environment and promoting sustainable practices. We believe in shaping a better future where innovation, responsibility, and hard work lead to success.

This code of conduct reflects the values that guide TYRI, including excellence, sustainability, and integrity. As such, we expect all our suppliers to align with these principles to continue providing products or services to TYRI. We also require our suppliers to share these values with their employees and within their own supply chains.

Suppliers must ensure that appropriate documentation is kept demonstrating compliance with TYRI's Supplier Code of Conduct and must provide us with access to that documentation upon request.









Image above from left to right:
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Legal Compliance

All suppliers must comply with all applicable laws, rules, and legal regulations in the countries in which they operate and must maintain a system to monitor compliance with such laws, rules, and legal regulations.

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of raw materials and components.

Suppliers are expected to inform TYRI of any specific sanctions or export controls that relate to their supplies to TYRI.

SUSTAINABILITY & ENVIRONMENTAL RESPONSIBILITY

As a world-leading manufacturer of Lighting for off highway applications, with manufacturing operations around the world, we look to play our part within the supply chain to protect the environment and promote sustainable development.

Our objective is to reduce the direct impacts of our operations, and to produce more sustainable solutions for our customers. We aim to ensure a sustainable future for our business, and for the communities in which we operate.



We are committed to:

- Protecting the environment and preventing pollution.
- Ensuring all our operations and products fulfil our compliance obligations.
- Promoting energy management in our operations.
- Designing and manufacturing products with an increasingly sustainable life cycle.
- Investing in the development of new technologies that reduce emissions.
- Working with the communities to minimise negative impacts from our operations as required
- Regularly reviewing our progress against our commitments at all levels of the business to ensure the delivery of continuous environmental improvement.
- Minimising the amount of packaging waste that is generated by our business.
- Minimising our consumption and receipt of 'single use' plastics.



We expect all our suppliers to:

- Take action to prevent pollution and environmental degradation.
- Take action to minimise the use of natural resources including energy.
- Comply with all applicable environmental legislation.
- Implement and maintain an appropriate environmental management system, ideally with third party certification such as the ISO14001 standard.
- Support TYRI's own implementation and maintenance of the ISO14001 standard.
- Manage hazardous material in line with applicable laws, regulations, standards and best practice.
- Train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment.
- Design production and supply chain processes to ensure efficient use of resources and to minimise environmental impact.
- Optimise fit for purpose packaging to minimise environmental impact and waste.
- Be responsible for managing and reducing the environmental impacts of outsourced processes and services.
- Be able to demonstrate the benefits of their activity to manage and reduce environmental impacts.

SOCIAL RESPONSIBILITY

We believe all people have a right to life, personal liberty, personal security and to be treated with dignity and respect.

We are committed to maintaining an ethical and transparent supply chain free of all types of modern slavery and human trafficking. It is the right of all people to receive fair, equal and non-discriminatory consideration in access to, and the processes of, employment.

We take the health and safety of our employees, visitors, contractors, customers and suppliers very seriously. We believe this is something we all have to play a part in - it is our legal and moral responsibility to take care of ourselves and others.



We expect all our suppliers to:

- Guarantee an individual's free choice of employment.
- Respect employee freedom of association and the right to collective bargaining.
- Not use child labour – the minimum age for admission to employment should not be less than the age of completion of compulsory schooling and never be less than 15 years. Hazardous work may not be done by anyone below the age of 18.
- Not to discriminate based on race, colour, sex, religion, political opinion, national extraction or social origin.
- Ensure working hours are not excessive and comply with local labour laws and regulation.
- Provide working conditions that are safe and hygienic.
- Not allow harsh or inhumane treatment.
- Only employ individuals with the legal authorisation to work.
- Apply these principles to your suppliers and sub-suppliers.


TYRI LIGHT

ETHICAL BUSINESS PRACTICES

Our corporate conduct is based on our commitment to act professionally, transparently, fairly and with integrity and to actively seek to avoid the appearance of any wrongdoing. It is better to miss out on business or incur additional costs than be involved in corrupt practices.

Bribery and Corruption

We have a zero tolerance of bribery and corruption.

We do not tolerate any form of bribery/corruption, and we require all employees of TYRI companies and of all associated persons (including our suppliers and agents) to act in line with this principle.

TYRI will not offer, give or receive, either directly or through any third party, any financial or other advantage to obtain new business, retain existing business or secure any other improper advantage and we will not permit others to do so.





We expect all our suppliers to:

- Never carry out and actively prevent the offering, promising or giving and the requesting, agreeing to receive or accepting of anything that could be construed as a bribe by any person associated with them (bribe being an offer or receipt of something of value as an inducement or reward for improper performance or acting not in good faith or with impartiality in connection with a function or activity and in relation to the performance of a function or activity not subject to the law of the United Kingdom, any local custom or practice is to be disregarded unless permitted or required by the written law of the country or territory concerned).
- Prevent the payment of facilitation or 'grease' payments made to secure or speed up routine actions where these are not permitted by the written law of the territory in question and only make such payments where a formal receipt or written confirmation of its legality can be obtained. If, however, the demand is accompanied by immediate threat of physical harm then safety should always be a priority.
- Promote honesty and integrity in their business conduct including through training of staff.
- Never conceal or fail to record accurately and completely the true nature of its activities as a supplier to us.
- Never pursue business that requires them or us to engage in unethical or illegal activity including extortion, fraud, deception, collusion, cartels, theft and money laundering.
- Promote honesty and integrity in their business conduct including through training of staff.
- Never conceal or fail to record accurately and completely the true nature of its activities as a supplier to us.
- Never pursue business that requires them or us to engage in unethical or illegal activity including extortion, fraud, deception, collusion, cartels, theft and money laundering.
- Notify us immediately of any incidents of bribery and any suspicions about bribery and corruption that relate to TYRI business, including:

  - if they become aware that any of the supplier's directors, officers or employees have a relationship with any TYRI representative that could result in a conflict of interest.

  – if they consider any demands or requests received from any TYRI representative to be improper or inappropriate.

  – if any request for a facilitation payment is made.

  – if they become aware that any of the supplier's directors, officers or employees act in the capacity of a Public Official where this could be relevant to their relationship with us.
- We prohibit the offer or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of a business transaction (where a common-sense approach should be applied with rejection in the cases of any doubt).

  Promotional expenditures of this type are only considered legitimate where they are open and transparent, proportionate, reasonable, accords with general business practice and are made in good faith for a legitimate business purpose and not where they place the recipient under any obligation or create any expectation in the giver.

  Cash gifts, regardless of value, will never be accepted.

BUSINESS INTEGRITY & COMPLIANCE

Competition Compliance

Fair competition is vital to our success, and we will not enter into any anti-competitive business practices with our suppliers.

We expect all our suppliers to:

- Promote vigorous, open, honest and fair competition and to conduct business in accordance with all applicable anti-competition or anti-trust law and regulations.
- Prohibit any actions that falsify or distort free competition or market access and not be involved in any anti-competitive understandings or agreements including improper exchange of competitive information; price fixing; bid rigging or improper market allocation.

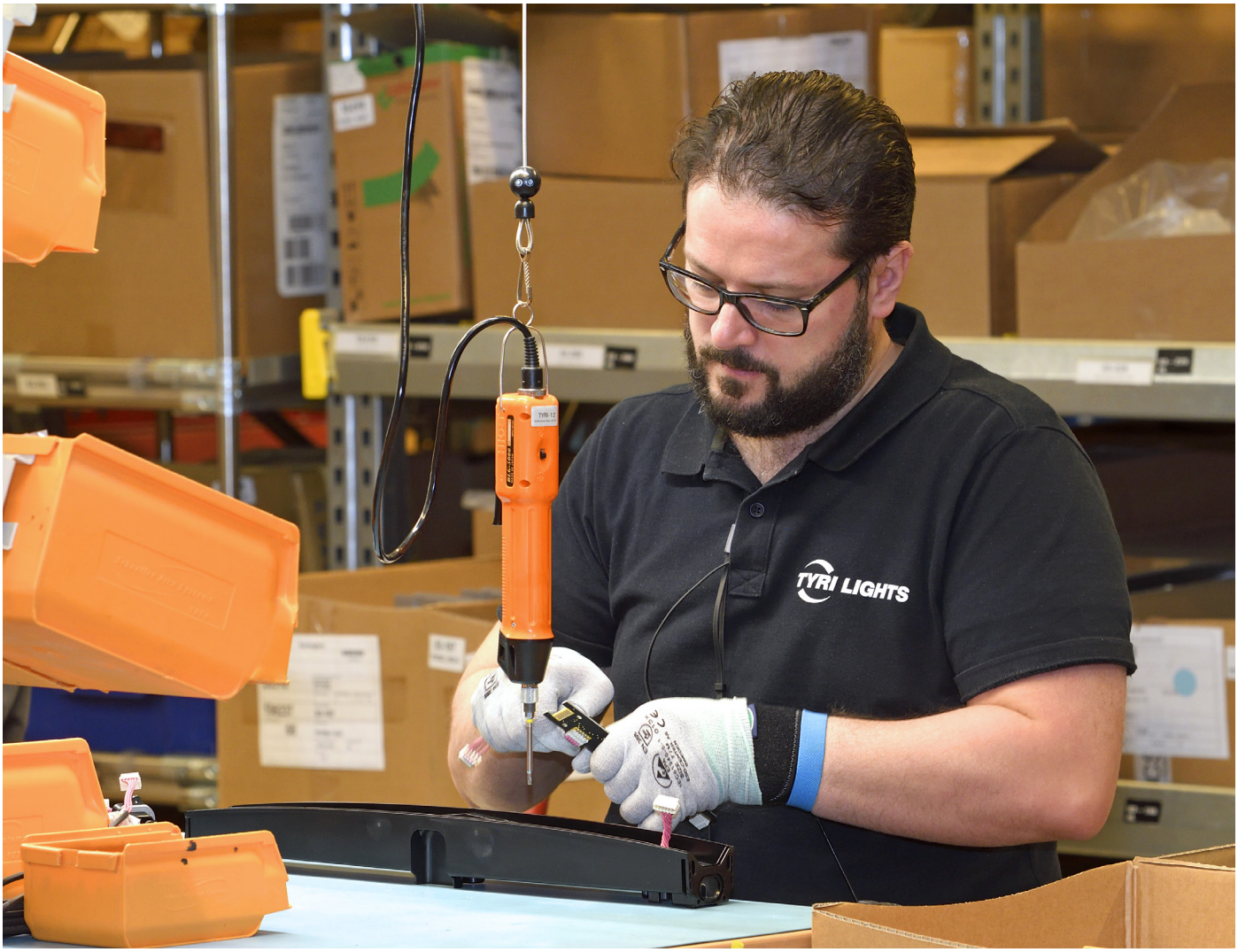


Confidentiality

A respect for confidentiality builds and develops trust. It allows for the free flow of information and enables a successful collaborative partnership.

We expect all our suppliers to:

- Ensure that confidential business information or trade secrets gained by virtue of the business activities with us is held in strict confidence and not improperly used or disclosed to third parties.
- Protect confidential information against improper disclosure when it is received, stored, transmitted or disposed of.
- Protect and secure our intellectual property.
- Restrict access to confidential information on a need-to-know basis.
- Raise any concerns regarding disclosure with us prior to releasing information to third parties.
- Not use the TYRI brand in their promotional or business activities without obtaining prior written permission from us.
- Upon request, return any information or data shared by TYRI and not to keep any local copies.



Human Rights

We are committed to respecting internationally recognised Human Rights principles and standards in all aspects of our business operations.

All suppliers must adhere to the principles stated in TYRI's Human Rights Policy (a copy of which is available on TYRI's website, tyrilights.com). This includes adherence to the human rights principles stated in the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles.

Audit and Termination of Agreements

TYRI reserves the right to verify a supplier's compliance with this code. Where a supplier review or audit identifies areas of non-compliance, the supplier must implement time-bound corrective actions to lead to compliance.

TYRI reserves the right to terminate an agreement with any supplier that does not comply with this Code.

Suppliers can direct questions or comments about this code of conduct to their purchasing commercial contact.

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COC-202605-1-EN