

SUSTAINABLE TYRI

(Updated October 1st 2026)

Policies for a profitable and responsible growth

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SUSTAINABLE TYRI

Policies for a profitable and responsible growth

RESPONSIBLE GROWTH

At TYRI, we strive to be a growing and profitable company that exists to create value for our customers, employees, and the world around us. Our growth journey is guided by a strong commitment to people, the environment, and ethical responsibility. We believe that sustainable success is achieved by balancing business development and innovation with respect for human well-being, environmental stewardship, and high standards of integrity and moral conduct.

PROFITABLE SUSTAINABILITY

For sustainability to be long-term, it must not become a cost. We are working diligently to identify sustainable solutions that are also profitable for both us and our customers. Our sustainability efforts should make us a preferred and competitive partner of choice.

We aim to build the expertise required to develop and produce the most sustainable lighting solutions in the world—together with our customers. When profitability becomes an asset, it enables a long-term commitment.

Martin Karlberg	Ken Turzinski	Michael Bradley
CEO TYRI Sweden	CEO TYRI Americas	CEO TYRI UK

THE VALUES THAT MAKE US GROW

We work consistently across six focus areas where we aim to challenge our industry peers. The combination of these areas makes us unique and drives our growth in a sustainable way.

Highest Quality

High quality is a prerequisite for working with the world's leading OEMs. However, it is also important that we clearly define what quality means to us. While product quality is essential, we place equal emphasis on light quality.

We develop and produce world-class work lighting solutions designed to meet the highest standards of performance and reliability. Our dedicated in-house R&D department and advanced testing laboratory enable us to continuously innovate and ensure superior quality.

Every product undergoes 100% testing during production to guarantee consistent performance and durability.

Most Innovative

Innovation is a core value for many companies. For us, it is part of our DNA. For more than 50 years, we have been at the forefront of our industry, continuously developing new technologies and solutions.

Today, this commitment to innovation is clearly reflected in new product concepts such as INTELLilight, Drive Lights with Tri-LED technology, and the development of innovative production methods.

Best Design Partner

Our OEM customers are experts in designing their vehicles. We specialize in developing advanced lighting solutions for heavy-duty vehicles. By working closely together with our customers' development teams, we combine our expertise to achieve the best possible results. This close collaboration enables us to create innovative, high-performance lighting solutions that meet the specific needs of each vehicle platform.

Knowledge leader

We recruit the best and most competent people available in the market. We also provide them with the conditions and opportunities to develop together with us and our customers. Good working conditions, combined with a positive and creative environment, encourage them to grow with us and remain part of our organization. We are also a company that explicitly aims to be at the forefront and is willing to continuously test new ideas.

Most Flexible

We love the challenges we receive from our customers—the more difficult they are, the more interesting they become. Most things are possible to accomplish when the willingness and interest are there.

Best for Sustainability

TYRI is proud to be a global leader in designing and manufacturing high-quality LED work lights, producing soon 2 million lights annually. We recognize the significant impact our work has on the environment and we are fully committed to driving meaningful change. While our expertise lies in creating innovative lighting solutions, we are dedicated to embracing sustainability as a core value. Our focus goes beyond words – it's about taking decisive action today for a better tomorrow.

CUSTOMERS WE SERVE

We serve two primary customer groups. The first consists of OEMs and manufacturers of heavy vehicles who integrate our products into their machines. These customers rely on us to provide high-quality lighting solutions that combine performance, reliability, and cost efficiency. We support them by offering both customized solutions and standardized products, while acting as trusted advisors and contributing our core expertise in intelligent work lighting. Our ambition is to be a strong business partner that helps our customers improve efficiency and long-term profitability.

The second important customer group is the end user—the machine operator. For them, it is essential that our products deliver high quality, reliability, and value. Our solutions are designed to contribute to a safer, more comfortable, and more productive working environment.

Across both customer groups, we are committed to delivering responsible, sustainable solutions that create value for our customers and support safe and efficient operations.

PEOPLE – LABOUR, HUMAN RIGHTS & SOCIETY

EMPLOYEES AT TYRI

TYRI strives to create a workplace where employees thrive, develop, and maintain a healthy work–life balance. The company is committed to providing fair working conditions, a positive work environment, and social benefits that support employee well-being and long-term engagement. We should always meet or exceed local laws and regulation.

Work and Work–Life Balance

TYRI works to create conditions that support a sustainable balance between work and private life. Working hours should be planned in a way that allows for recovery and reduces stress. Where operationally feasible, flexibility in working hours and working methods may be applied. Employees whose roles permit it may work remotely up to one day per week, unless otherwise agreed with their immediate manager.

Right to Disconnect

TYRI respects employees' need for rest and recovery. As a general rule, employees are not expected to respond to emails, phone calls, or other work-related communications outside of regular working hours, unless otherwise specifically agreed.

Performance Reviews and Development

All employees are offered annual performance and development reviews with their immediate manager. These discussions aim to follow up on the work environment, job satisfaction, performance, development opportunities, and individual goals.

Compensation and Benefits

TYRI offers competitive and fair compensation in accordance with applicable legislation and any collective agreements. The company conducts annual salary reviews to ensure fair and market-aligned salary development. The company also provides social benefits that support employee health and well-being, such as wellness allowances and other employee benefits in line with company policies.

Dialogue and Participation

TYRI encourages open dialogue between management and employees. Through regular communication and performance reviews, the company continuously works to improve working conditions and the work environment.

GOOD CITIZEN – in the Community

We strive to be a responsible and trusted member of the communities where we operate. Our operations contribute to local economic development through job creation, responsible business practices, and collaboration with local stakeholders. We are committed to minimizing the environmental impact of our activities, complying with applicable laws and regulations, and operating with transparency and integrity.

SUSTAINABLE PROCUREMENT

The TYRI Supplier Code of Conduct (see separate document) defines the principles that govern our business relationships with suppliers. The Code outlines the expectations and requirements that suppliers must meet when working with TYRI.

The document covers key areas including legal compliance, human rights, sustainability and environmental responsibility, social standards, ethical business practices, anti-bribery and anti-corruption, fair competition, and confidentiality.

All suppliers are required to comply with the TYRI Supplier Code of Conduct and formally acknowledge their commitment by signing the document.

ENVIRONMENT: "GREEN BY TYRI" – JOIN THE CHALLENGE

TYRI is proud to be a global leader in designing and manufacturing high-quality LED work lights. We recognize the significant impact our work has on the environment and we are fully committed to driving meaningful change.

While our expertise lies in creating innovative lighting solutions, we are dedicated to embracing sustainability as a core value. Our focus goes beyond words – it's about taking decisive action today for a better tomorrow.

As part of this challenge, we aim to collaborate with our OEM Customers. With our expertise in efficient, environmentally conscious work lights, we're constantly innovating. Working alongside some of the world's most demanding OEM customers has given us the drive and insight to keep improving.

Our goal is to join forces to develop projects that make a real difference – for our customers businesses and the planet.

Key finding about environmental impact

Less than 5% of the CO_2 emissions from our products is generated during production.
Over 90% of the CO_2 emissions occur during the usage phase of the lights' life cycle.
At TYRI, we're committed to reducing our environmental impact at every stage—both in production and throughout the product's life cycle. However, the greatest opportunity to make a difference for the planet lies in improving energy efficiency during use.

OUR STRATEGY – Three steps towards a better environment

Step 1 - Compliance to laws & regulations

At TYRI, we are committed to adhering to all laws and regulations concerning sustainability. This goes beyond environmental concerns—it includes fostering a safe and ethical working environment and addressing broader sustainability challenges. We are proud to hold certifications like **ISO 14001:2015**, **ISO 9001:2015** and **EcoVadis**, as well as being **RoHS compliant**, demonstrating our global commitment to sustainable practices.

Step 2 - Meeting growing customer demands

As a trusted partner of the world's leading OEMs, TYRI collaborates closely with customers who share our dedication to sustainability. Together, we develop tailored strategies to minimize environmental impact and advance our shared vision of a sustainable future.

Step 3 - Sustainability through design

Innovation is at the heart of TYRI's approach. We have the know-how to offer cutting-edge, sustainable lighting solutions—from eco-friendly designs to products that can be fully CO_2-neutral (in production phase).

GLOBAL POLICIES – LOCAL IMPLEMENTATION
From Policies to Action

TYRI Global establishes global policies that apply to all operations and suppliers. These policies define the principles, rules, and guidelines that govern how we conduct our business, both internally and externally.

Based on these global policies, each operation is responsible for developing local or regional implementation plans. These plans translate the global requirements into concrete actions, including defined measures, targets, and key performance indicators (KPIs) to monitor progress and ensure continuous improvement.

TYRI POLICY DOCUMENT

HUMAN RIGHTS POLICY

Effective Date: 2025-12

1. Policy Statement

TYRI is committed to respecting and upholding internationally recognized human rights across all
aspects of our operations, products, and services. We recognize our responsibility to avoid infringing
on the human rights of others and to address adverse human rights impacts with which we are involved.

This policy sets out TYRI's commitment, expectations, and processes for preventing, mitigating,
and remediating human rights risks and impacts.

2. International Standards

TYRI's approach to human rights is guided by and aligned with the following internationally recognized standards:

- The United Nations Universal Declaration of Human Rights (UDHR)
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises

These standards form the minimum baseline for our conduct, regardless of where we operate.

3. Scope of Application

This policy applies to:

- All TYRI employees, directors, and temporary workers
- Contractors, consultants, and agency workers acting on behalf of TYRI
- Business partners, suppliers, distributors, and other parties directly linked to TYRI's operations, products, or services

We expect all third parties to respect human rights standards consistent with this policy and applicable law.

4. Key Human Rights Commitments

TYRI is committed to:

- Prohibiting all forms of forced, bonded, or child labour
- Providing fair wages, reasonable working hours, and safe and healthy working conditions
- Ensuring equal opportunity and non-discrimination in employment
- Respecting freedom of association and the right to collective bargaining
- Maintaining a workplace free from harassment, abuse, and intimidation
- Respecting privacy and data protection rights

5. Preventing and Mitigating Adverse Human Rights Impacts

TYRI takes the following actions to prevent or mitigate adverse human rights impacts:

- Integrating human rights considerations into company policies, procedures, and decision-making
- Conducting risk-based due diligence on suppliers and business partners
- Including human rights expectations in supplier agreements and codes of conduct
- Assessing human rights risks related to new projects, products, or business relationships

• Taking corrective actions where risks or impacts are identified, including working with partners to improve practices

6. Remediation and Grievance Mechanisms

TYRI is committed to providing or cooperating in the remediation of human rights violations where we have caused or contributed to adverse impacts.
Measures include:
• Maintaining accessible and confidential grievance channels for employees and external stakeholders
• Investigating reported concerns promptly and fairly
• Taking appropriate corrective and disciplinary actions where violations are confirmed
• Working with affected parties and relevant stakeholders to ensure effective remediation
Retaliation against individuals who raise concerns in good faith is strictly prohibited.

7. Training and Awareness

TYRI provides human rights awareness and training to relevant employees to ensure understanding of this policy and associated responsibilities.

Training measures include:
• Human rights awareness as part of employee induction
• Periodic refresher training for management and procurement staff
• Targeted training for roles with higher human rights risk exposure

8. Governance, Monitoring, and Accountability

Senior management at TYRI is responsible for overseeing the implementation of this policy.

We commit to:
• Monitoring compliance with this policy
• Reviewing and updating the policy as necessary
• Addressing non-compliance through appropriate corrective actions

9. Communication

This policy is publicly available and communicated internally and externally to ensure awareness
among employees, suppliers, and business partners.

10. Approval and Review

This Human Rights Policy is approved by TYRI management and is reviewed periodically to ensure
ongoing alignment with international standards and business practices.

TYRI POLICY DOCUMENT

FORCED LABOUR AND HUMAN TRAFFICKING POLICY

Effective Date: 2025-12

1. Policy Statement

TYRI is committed to conducting business ethically and responsibly. We strictly prohibit all forms
of forced labour, bonded labour, involuntary prison labour, slave labour, and human trafficking across our operations and supply chains. This policy meets expectations for protecting workers'
rights and dignity.

2. Scope

This policy applies to all employees, contractors, agency workers, temporary workers, interns, and
any third parties working on behalf of TYRI.

3. Prohibition of Forced Labour and Human Trafficking

- All forms of forced labour or slave labour are strictly prohibited.
- Work must be freely chosen, and workers shall not be coerced, threatened, or forced to work against their will.

4. Freedom of Movement

- Unreasonable restrictions on workers' freedom of movement are prohibited.
- Workers are free to enter and exit the workplace outside of working hours, subject only to reasonable health, safety, and security requirements.

5. Identity and Travel Documents

- Confiscation or withholding of identity documents, work permits, immigration documents, travel documentation, or passports is strictly prohibited.
- Identification document checks are required solely for legal right-to-work verification and must be conducted lawfully and respectfully.
- Any documents provided by workers will be returned immediately after verification.
- Employment-related documents will be provided in a language the worker can understand.

6. Employment Contracts and Terms

- All workers will be provided with the terms and conditions of their employment in writing before or at the start of employment.
- Workers may cancel or terminate their work contracts at any time, subject only to applicable legal notice requirements.
- There will be no financial penalty, deposit forfeiture, or retaliation if a worker chooses to break or terminate their contract.

7. Fees and Deductions

- Workers shall not be required to pay recruitment, placement, or employment-related fees that could lead to debt bondage.

8. Reporting and Compliance

- Workers are encouraged to report any concerns related to forced labour or human trafficking without fear of retaliation.
- TYRI will investigate all reports promptly and take appropriate corrective action.

9. Responsibility

Management is responsible for implementing this policy, ensuring awareness, and monitoring compliance across all operations.

10. Review

This policy will be reviewed periodically to ensure continued compliance with applicable laws and
best practices.

TYRI POLICY DOCUMENT

CHILD LABOUR POLICY

Effective Date: 2025-12

1. Policy Statement

TYRI is committed to preventing child labour and safeguarding young people. We do not employ or engage any person under the age of 16. Limited work experience placements for persons under 16 are permitted only where they are lawful, educational, non-hazardous and fully controlled.

2. Legal Compliance

This policy complies with the Children and Young Persons Act 1933, Local education legislation, health and safety law, and all other applicable employment regulations.

3. Minimum Age and Employment

- The minimum age for employment, apprenticeships, agency work or paid engagement at TYRI is 16 years.
- No person under 16 may be employed in any capacity.

4. Work Experience (Under 16)

- Work experience placements for persons under 16 are permitted only for educational purposes and must be arranged through a recognised school, college or local authority.
- Work experience participants are not employees and may only receive expenses where permitted by law.

5. Restrictions on Work Experience

Persons under 16 on work experience must not:

- Enter manufacturing, production, maintenance, warehouse or waste-handling areas
- Operate, clean or maintain machinery or equipment
- Handle hazardous substances, chemicals or waste
- Be exposed to excessive noise, heat, dust, fumes or vibration
- Undertake any task that could endanger their health, safety or wellbeingSupervision and

6. Safeguarding

- Work experience participants must be under continuous supervision at all times.
- A suitable health and safety risk assessment must be completed before placement.
- Emergency and safeguarding procedures must include work experience participants.

7. Young Workers (16–17 Years)

- Young workers may only be employed following appropriate risk assessments.
- Hazardous work is prohibited unless legally permitted and adequately supervised.
- Working hours, rest breaks and night work restrictions will comply with local law.

8. Verification and Records

- Proof of age will be verified prior to employment or placement.
- Records of work experience placements, risk assessments and supervision arrangements will be maintained.

9. Breaches

Any breach of this policy will be treated as a serious matter and may result in disciplinary action.

10. Responsibility and Review

Senior management are responsible for implementation and enforcement. This policy will be reviewed periodically.

TYRI POLICY DOCUMENT

CONFLICT MINERALS AND EXTENDED MINERALS POLICY

Effective Date: 2026-02

1. Policy Statement

At TYRI we are committed to ethical business practices, responsible sourcing, and transparency within our supply chain. As part of this commitment, we actively engage in the assessment and reporting of minerals used in our products through industry-standard tools, specifically the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT).

Conflict Minerals Reporting Template (CMRT):

The CMRT is a vital tool in our due diligence e orts to identify and address the potential presence of conflict minerals (tin, tantalum, tungsten, and gold - 3TG) in our supply chain. By utilizing the CMRT, we seek to ensure that our minerals are sourced responsibly, avoiding any contribution to human rights abuses, environmental degradation, or conflict financing.

Extended Minerals Reporting Template (EMRT):

In addition to our commitment to 3TG, TYRI recognises the importance of considering extended minerals that may pose similar risks. The EMRT is employed to assess and report information about the sourcing of these extended minerals, furthering our dedication to responsible mineral procurement and supply chain management.

OUR COMMITMENT

Transparency:

We believe in transparency and openness about our mineral sourcing practices. The information collected through the CMRT and EMRT is shared with relevant stakeholders to demonstrate our commitment to responsible supply chain management.

Continuous Improvement:

TYRI is dedicated to continuous improvement. We stay informed about industry best practices, updates to reporting templates, and advancements in responsible sourcing to enhance our due diligence processes.

Supplier Engagement:

We expect our suppliers to actively participate in completing the CMRT and EMRT, providing accurate and comprehensive information about the origin of minerals in their products. This collaboration is fundamental to our shared goal of responsible mineral sourcing. If it is determined that any of our supply chain is sourcing material that are not free of conflict minerals we will take immediate action with our supply chain to transition to conflict free sources.

Quantitative targets:

Aim to have 100% of suppliers respond to CMRT and EMRT in 2026 (baseline year: 2025).

Review and Compliance:

TYRI's CMRT and EMRT reporting documents along with this policy will be reviewed regularly to ensure its relevance and e ectiveness.

By adopting the CMRT and EMRT, TYRI demonstrates its commitment to responsible business practices, upholding the highest standards in mineral sourcing and supply chain management.

TYRI POLICY DOCUMENT

RESPONSIBLE SOURCING POLICY

Effective Date: 2025-12

1. Policy Statement

TYRI is committed to responsible sourcing practices that ensure goods and services are procured in an ethical, environmentally responsible, and commercially sound manner. This policy defines the principles and standards that guide our procurement decisions and supplier relationships.

2. Scope

This policy applies to all procurement activities undertaken by TYRI including purchasing, sourcing, contracting, and supplier management. It also applies to all suppliers, contractors, and service providers engaged by the organization.

3. Responsible Sourcing Principles and Standards

TYRI commits to the following responsible sourcing principles in its procurement process: - Ethical business conduct, integrity, and transparency - Compliance with all applicable laws, regulations, and industry standards - Respect for human rights and fair working conditions - Environmental responsibility and sustainability - Commercial responsibility and fair dealing.

4. Environmental Responsibility

TYRI works with its suppliers to ensure they operate in an environmentally responsible manner.

This includes encouraging suppliers to:

- Minimize environmental impact, waste, and emissions
- Use resources efficiently, including energy and water
- Comply with applicable environmental laws and regulations
- Adopt sustainable practices where feasible

Environmental performance may be considered as part of supplier selection, evaluation, and ongoing monitoring.

5. Commercial Responsibility

TYRI works with its suppliers to ensure they operate in a commercially responsible manner. This includes expectations that suppliers:

- Conduct business ethically and fairly
- Avoid bribery,corruption, and anti-competitive practices
- Maintain accurate records and transparent pricing
- Manage risks responsibly and maintain business continuity

Commercial responsibility is a key consideration in supplier selection and contract management.

6. Supplier Engagement and Collaboration

TYRI seeks to build long-term relationships with suppliers based on trust, transparency, and shared values. Suppliers are required to demonstrate compliance with this policy and to cooperate with audits, assessments, or information requests.

7. Training and Awareness
TYRI provides training or awareness activities on responsible sourcing to relevant employees involved in procurement and supplier management. This ensures employees understand responsible sourcing principles, supplier expectations, and their role in implementing this policy.

8. Monitoring and Continuous Improvement
Supplier performance against responsible sourcing expectations may be monitored through reviews, self-assessments, or other appropriate methods. TYRI encourages continuous improvement and may work with suppliers to address identified gaps.

9. Governance and Responsibility
Management is responsible for implementing this policy and ensuring it is communicated internally and, where appropriate, to suppliers.

10. Review
This policy will be reviewed periodically to ensure its continued relevance and effectiveness.

TYRI POLICY DOCUMENT

ANTITRUST AND FAIR COMPETITION POLICY

Effective Date: 2025-12

1. Purpose

TYRI is committed to conducting business ethically, transparently, and in full compliance with applicable antitrust and fair competition laws. This policy establishes the principles and requirements that ensure fair competition and prevent anti-competitive conduct.

2. Scope

This policy applies to all employees, officers, directors, contractors, agents, and any third parties acting on behalf of TYRI in all jurisdictions where the organisation operates.

3. Applicable Laws and Regulations

TYRI complies with all applicable antitrust and fair competition regulations, including but not limited to:

- Competition and antitrust laws in applicable jurisdictions
- Laws prohibiting anti-competitive agreements, abuse of market dominance, and unfair trade practices

4. Prohibited Activities

The following activities are strictly prohibited and will not be tolerated:

- Price fixing, including agreements or discussions with competitors regarding pricing, discounts, or fees
- Bid rigging, including coordinating bids, bid suppression, or bid rotation
- Market or customer allocation agreements with competitors
- Collusion with competitors on production limits, sales strategies, or market entry
- Exchange of competitively sensitive information, such as pricing, costs, margins, or strategic plans
- Participation in illegal boycotts, including agreements to refuse to deal with specific customers, suppliers, or competitors
- Abuse of market dominance, where applicable
- Employees must avoid both actual violations and the appearance of anti-competitive behaviour.

5. Expectations and Responsibilities

- Employees must conduct business independently and competitively
- Any interaction with competitors must be lawful, limited, and appropriately documented
- Trade association participation must follow approved guidelines and agendas

6. Reporting Suspected Violations

Any suspected or actual antitrust or fair competition violations must be reported immediately through one of the following channels: Line Manager or Department Head. Reports may be made confidentially and without fear of retaliation.

7. Training and Awareness

TYRI provides antitrust and fair competition training to relevant employees:

- During onboarding for applicable roles
- Periodically thereafter through refresher training or compliance communications

This training ensures awareness of legal requirements, prohibited conduct, and reporting obligations.

8. Consequences of Non-Compliance

Violations of this policy may result in disciplinary action, up to and including:

- Termination of employment or contract
- Legal action
- Financial penalties or regulatory sanctions

Non-compliance may also expose TYRI and individuals to civil and criminal liability.

9. Policy Review and Updates

This policy is reviewed periodically and updated as necessary to reflect changes in applicable laws, regulations, or business practices.

TYRI POLICY DOCUMENT

ANTI-COUNTERFEITING MEASURES POLICY

Effective Date: 2025-12

1. Purpose

TYRI is committed to protecting its customers, brand, and supply chain from the risks associated with counterfeit, fraudulent, or unauthorized goods. This policy outlines the measures TYRI takes to mitigate counterfeiting risk and ensure the authenticity and quality of products and components.

2. Scope

This policy applies to all employees, contractors, suppliers, distributors, and third parties involved in the sourcing, manufacturing, handling, storage, or distribution of products and components for TYRI.

3. Anti-Counterfeiting Principles

TYRI maintains controls designed to:

- Prevent the introduction of counterfeit or unauthorized goods into the supply chain
- Detect and respond to suspected counterfeit products
- Ensure products received from suppliers are authentic and meet contractual and quality requirements

4. Supplier Verification and Goods Authentication Process

TYRI implements a verification process for goods received from suppliers, which includes:

Approved Supplier Program:

- Procurement is limited to approved and vetted suppliers
- Supplier approval includes assessment of legitimacy, certifications, and business reputation

Incoming Goods Verification:

- Verification of delivery documentation (purchase orders, invoices, certificates of conformity)
- Inspection of packaging, labelling, serial numbers, and part numbers where applicable
- Comparison of received goods against approved specifications

Traceability Controls:

- Maintenance of records linking goods to approved suppliers and purchase orders
- Retention of supplier documentation to support traceabilityEscalation of Suspected counterfeit

Goods:

- Any suspected counterfeit or non-conforming goods are quarantined
- Issues are escalated to Quality, Procurement, or Compliance for investigation
- Suppliers may be suspended or removed from the approved supplier list if counterfeiting is confirmed

5. Employee Responsibilities

Employees involved in procurement, receiving, quality inspection, and logistics must follow established verification procedures.

Any concerns regarding authenticity or supplier behavior must be reported promptly to management or the Compliance function

6. Reporting and Response

Suspected counterfeit products, documentation irregularities, or supplier misconduct must be reported through internal reporting channels, including:

- Line Manager
- Quality or Supply Chain Management

Reports will be investigated, and appropriate corrective actions will be taken.

7. Training and Awareness

TYRI provides awareness or training to relevant personnel on:

- Counterfeiting risks
- Supplier verification procedures
- Identification and reporting of suspected counterfeit goods

8. Enforcement and Non-Compliance

Failure to comply with this policy may result in disciplinary action and corrective measures. Suppliers found to be involved in counterfeiting may face contract termination and legal action where appropriate.

9. Policy Review

This policy is reviewed periodically and updated as necessary to address changes in counterfeiting risks, supplier relationships, or regulatory expectations.

TYRI POLICY DOCUMENT

ENVIRONMENTAL POLICY

Effective Date: 2025-12

TYRI

TYRI develops and delivers intelligent lighting solutions for demanding work environments. We take responsibility for the environmental impact arising from our products, services, and operations, and we actively work to contribute to a more sustainable industry.

Our environmental efforts are based on a life cycle perspective, where we focus on the areas in which we can make the greatest difference, particularly energy efficiency and material use in our products.

TYRI commits to:

Develop energy-efficient products

We continuously work to improve the energy efficiency of our lighting solutions, as energy use during the product's lifetime represents a significant share of its climate impact.

Optimize product design and material use

Through efficient design and responsible material choices, we strive to reduce resource use, climate impact, and waste throughout the product life cycle.

Use resources responsibly in our operations

We actively work to reduce energy consumption, material waste, and environmental impact in our operations, while increasing the share of renewable energy where possible.

Sort and recycle waste

We sort our waste and aim to recycle as much material as possible, as well as reduce the amount of waste generated in our operations.

Reduce climate impact from transportation

We plan and optimize transportation and prioritize solutions with lower climate impact.

Ensure responsible chemical management

We work systematically to minimize the use of hazardous substances and comply with applicable chemical legislation, including REACH.

Set requirements in the supply chain

We collaborate with our suppliers to ensure that materials, components, and processes meet our environmental requirements.

Comply with legal and other binding requirements

We comply with applicable environmental legislation and other relevant requirements related to our operations.

Work with continuous improvement

We monitor our significant environmental aspects, set environmental objectives, and work systematically to continuously improve our environmental performance.

Environmental management is an integrated part of TYRI's operations. Management is responsible for ensuring resources, follow-up, and improvement of the environmental management system, while all employees contribute to achieving our environmental objectives.

TYRI POLICY DOCUMENT

STATEMENT OF SUPPORT FOR THE UN's GLOBAL COMPACT

Effective Date: 2026-03

Commitment to Responsible Business

TYRI Lights supports the principles of the United Nations Global Compact (UNGC), the world's largest corporate sustainability initiative. We recognize the importance of responsible and sustainable business practices and strive to integrate ethical, environmental, and social considerations into our operations and decision-making processes.
The UNGC's Ten Principles provide a valuable framework for businesses committed to operating responsibly in the areas of **human rights, labour, environment, and anti-corruption**.

Our Commitment

At TYRI Lights, we are committed to aligning our strategies and operations with the Ten Principles of the United Nations Global Compact.

Human Rights

We support and respect the protection of internationally proclaimed human rights and ensure that we are not complicit in human rights abuses.

Labour

We uphold the freedom of association and the effective recognition of the right to collective bargaining. We oppose all forms of forced and compulsory labour, child labour, and discrimination in employment and occupation.

Environment

We support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

We work against corruption in all its forms, including extortion and bribery, and maintain high standards of business ethics and integrity.

Continuous Improvement

TYRI Lights continuously works to strengthen our sustainability performance and integrate responsible business practices throughout our organization and value chain. Our support for the principles of the United Nations Global Compact reflects our commitment to contributing to sustainable development and responsible global business practices.

TYRI POLICY DOCUMENT

ANTI-BRIBERY POLICY

We are committed to the highest standards of ethics and integrity and have a zero-tolerance approach to bribery.

This applies to all employees, officers, temporary workers, contractors, consultants, agents, subsidiaries, and anyone acting on our behalf ("associated persons").

Breaching this policy is a serious disciplinary, contractual, and potentially criminal matter.

What is Bribery?

Under the Bribery Act 2010, a bribe is a financial or other advantage offered, promised, given, requested, or accepted to induce or reward improper performance of a duty or activity.

It can involve:

- Public/government officials, political parties, or private individuals.
- Direct or indirect payments, gifts, or inducements.
- Securing business, contracts, regulatory advantages, or personal gain.

Prohibited Conduct

You must not:

- Offer, promise, give, request, or accept a bribe.
- Make facilitation payments (small, unofficial payments to speed up routine actions).
- Offer or accept gifts, hospitality, or entertainment to influence impartiality.

Permitted:

- Reasonable, proportionate, good-faith hospitality or recognised fast-track processes that are legal and documented.

Gifts, Hospitality and Entertainment

- Must have a clear business purpose, be appropriate, and approved in advance by a line manager.
- Gifts to others: capped at £50/USD50 per recipient and require prior written approval.
- All gifts/hospitality received or offered must be reported to your manager.
- Keep accurate records in line with our expenses policy.

Records and Due Diligence

- Keep accurate, detailed, and up-to-date business, financial, and hospitality records.
- Conduct due diligence before engaging suppliers, agents, or consultants, especially in high-risk areas.

Reporting Suspected Bribery

- Report concerns immediately to your line manager or the Compliance Officer.
- Concerns include suspected bribery, attempts at bribery, or instructions to cover up wrongdoing.
- Good-faith reports will be treated confidentially, and you will be protected from detrimental treatment.
- Use our whistleblowing channels if needed.

Consequences

- Allegations will be fully investigated.
- Proven bribery may result in gross misconduct dismissal and reporting to the police or Serious Fraud Office.
- We may terminate contracts with associated persons involved in bribery.

Training and Review

- Anti-bribery measures are communicated regularly.
- Training provided for employees, especially those in higher-risk roles.
- The Compliance Officer monitors, reviews, and updates the policy and procedures.

TYRI POLICY DOCUMENT

EQUALITY, DIVERSITY AND INCLUSION POLICY

We are committed to creating an inclusive workplace where everyone is treated with dignity and respect and can work free from discrimination, harassment or victimisation. We value diversity and recognise that our differences strengthen our organisation.

We clearly support equal opportunity and will make decisions fairly and consistently, based on merit and business need. We promote equality, diversity and inclusion throughout the employment lifecycle and ensure fair treatment in recruitment, pay and benefits, training, promotion, and all other employment decisions.

This policy applies to all employees, workers, contractors, volunteers, interns, apprentices and job applicants.

Equality and non-discrimination

We do not discriminate on the basis of any protected characteristic under the Equality Act 2010, including disability, sex, gender reassignment, race, religion or belief, sexual orientation, age, pregnancy or maternity, or marital or civil partnership status. We also seek to ensure fair treatment regardless of working pattern, caring responsibilities or socio-economic background.

Harassment, bullying and victimisation

Harassment, sexual harassment, bullying and victimisation are not tolerated. Any behaviour that violates a person's dignity or creates an intimidating, hostile or offensive environment is unacceptable and may result in disciplinary action.
Concerns should be raised in line with our Anti-Harassment and Anti-Bullying Policy.

Equality of opportunity

We take reasonable steps to promote equality of opportunity and to remove barriers that may disadvantage certain groups. This includes:

- fair and inclusive recruitment and promotion processes;
- regular review of selection criteria and working practices; and
- mandatory equality, diversity and inclusion training for all staff.

Disability inclusion and reasonable adjustments

We are committed to supporting disabled employees and job applicants. We will make reasonable adjustments where required to ensure individuals are not placed at a substantial disadvantage and can perform their role on an equal basis with others.
Employees are encouraged to discuss any adjustment needs with their line manager.

Responsibilities

Everyone is responsible for upholding this policy and for treating others fairly and with respect. Managers have a particular responsibility to ensure this policy is applied consistently.

Training and awareness

We provide equality, diversity and inclusion (EDI) training and awareness to help everyone understand their responsibilities and support an inclusive workplace.

Monitoring and review

We monitor equality and inclusion practices in line with our data protection obligations and review this policy regularly to ensure it remains effective and compliant. We may monitor

recruitment, pay, benefits and promotion outcomes (where practical and proportionate for the size of the organisation) to identify and address any barriers or gaps, and we will take reasonable steps to improve fairness where issues are found.

TYRI POLICY DOCUMENT

WHISTLEBLOWING POLICY

We are committed to preventing and addressing fraud, misconduct, wrongdoing, and inappropriate behaviour, including sexual harassment. Employees and workers are encouraged to report concerns about the conduct of others or the way the Company is run, without fear of victimisation.

What to Report

You can raise concerns if you reasonably believe, in the public interest, that any of the following has happened, is happening, or is likely to happen:

- Criminal offence
- Miscarriage of justice
- Sexual harassment or a failure to take reasonable steps to prevent it
- Risk to health and safety
- Environmental damage
- Breach of a legal obligation
- Concealment of any of the above

Proof is not required — a reasonable belief is enough. This process is not for personal employment disputes, which should follow the Grievance Procedure.

Protection

- We will keep the identity of anyone raising a concern confidential as far as possible. Information will only be shared where necessary to investigate, to meet legal obligations, or where required by a regulator or court.
- You will not be dismissed, disadvantaged, or victimised for making a genuine disclosure.
- Victimisation or instructions to cover up wrongdoing are disciplinary offences.
- Malicious or knowingly false allegations may result in disciplinary action.

How to Raise a Concern

1. First — Raise it with your line manager, unless you believe they are involved or you prefer not to approach them.
2. If not appropriate — Contact a Company Director who will ensure an impartial investigation.
3. Investigation — Concerns will be investigated promptly, confidentially, and fairly. You will be informed of the outcome and any action taken.
4. If unsatisfied — You may escalate to an appropriate external authority, such as HMRC, FCA, HSE, Environment Agency, or Serious Fraud Office.

Training and Awareness

- Whistleblowing awareness is covered during induction, so everyone understands what a protected disclosure is and how to raise concerns.
- Refresher guidance will be provided periodically (for example through brief updates, toolbox talks, or policy reminders), and when there are significant legal or policy changes.
- Managers will receive additional guidance on how to handle concerns sensitively, maintain confidentiality, and avoid any detriment to the person raising the concern.

Data Protection

All personal data will be processed securely and only used for dealing with the disclosure, in line with our Data Protection Policy.