

Avon Rubber Modern Slavery Statement 2020

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Avon Rubber p.l.c.'s slavery and human trafficking statement for the year ending 30 September 2020.

This statement sets out Avon Rubber's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Our company structure and business

Avon Rubber p.l.c. ('Avon') is the UK based parent company of a group of companies with operations in the UK and USA. This statement covers all companies within the Group. Avon is an innovative design and engineering group, which through its Avon Protection business, designs and produces specialist life critical personal protection systems for the world's militaries and first responders. We have over 1,000 employees worldwide with the majority of our workforce consisting of full-time employees and a small percentage of sub contracted workers to carry out specific tasks. In the financial year ended 30 September 2020 Avon reported a global annual turnover in excess of £168m.

At Avon, we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation.

Our policies

Avon has a zero tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking ('Modern Slavery') within our supply chains. We are committed to respecting human rights wherever we operate, within our sphere of influence. This applies equally to our employees, our suppliers and business partners, all of whom are expected to uphold our high standards of ethical behaviour.

Our Code of Conduct (the 'Code'), which applies to everyone acting for or on behalf of Avon, specifically addresses the requirement for compliance with modern slavery and human trafficking legislation and this is updated and reissued to all Avon employees every year. The Code also explains that Avon does not accept any form of child or forced labour and that Avon will not do business with anyone who fails to uphold these standards.

We have also instituted a Supplier Code of Conduct to clearly set out Avon's expectations within our supply chain. The Supplier shall maintain in place policies and procedures governing its business ethics which ensures it complies with this code.



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Suppliers

Each of the Group's businesses continue to be responsible for undertaking appropriate due diligence on respective suppliers. Suppliers will not and will ensure that its employees, subcontractors, agents and representatives will not, engage in any activity, practice or conduct which would constitute an offence under any Modern Slavery legislation.

All new suppliers are required to complete a Modern Slavery self-assessment questionnaire and sign a statement of compliance. A review is carried out of the self-assessment questionnaire responses and if the supplier is deemed to be at high risk of Modern Slavery from the results, an additional review process would be undertaken, including notifying the supplier that they implement the necessary changes to achieve compliance with our Human Rights Principles. We also reserve the right to audit the supplier should a high risk of Modern Slavery be found and to terminate our relationship with them if deemed appropriate.

We continue to keep detailed records of each supplier that we use. We also recognise the importance of building long-term relationships with our suppliers and making clear our expectations in relation to Modern Slavery.

Training and Effectiveness

Our Code of Conduct sets out clear expectations on ethical conduct and we offer support to employees to help them understand the right thing to do. Our Code is mandated for all employees and directors of Avon, our suppliers and controlled joint ventures wherever they are based.

To raise awareness of the issues of Modern Slavery throughout the business, we circulate internal communications to all employees explaining what Modern Slavery is, the potential warning signs and who can be contacted with any concerns.

Employees

Our Code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Our recruitment processes are in line with the applicable employment laws of the countries in which we operate. Subject to the local laws in each jurisdiction, individuals are verified for identity, employment and academic history, nationality and right to work status and criminal record checks.

Where we work with third party recruitment service providers, we only use reputable recruitment agencies and we conduct due diligence to ensure that the individual is not subject to Modern Slavery.



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Whistleblowing

We encourage all workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. All employees are encouraged to report any matter which they believe may be a breach or a suspected breach of our Code of Conduct or any unethical or illegal behaviour, either through management or confidentially through the 'Speak Up' button on our intranet.

If modern slavery or human trafficking were found within our directly contracted suppliers, we would act immediately to work with the supplier and relevant authorities to understand the circumstances of what has been found and to put in place corrective actions that help the affected workers and protect them from further harm. If the supplier is unwilling to address the issue, then corrective action may include termination of contracts. There were no reports of slavery or human trafficking in 2020.

This statement was approved by the Board of Avon Rubber p.l.c. on 12 November 2020 and signed on its behalf by:



Paul McDonald
Chief Executive Officer
Avon Rubber p.l.c



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