

Avon Modern Slavery Statement 2016/2017

This statement is made in accordance with section 54 of the Modern Slavery Act 2015. It describes the steps taken by Avon Rubber p.l.c. (Avon) during the year ending 30 September 2017 to prevent modern slavery and human trafficking in our supply chains.

Introduction

Avon has a zero tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking ('Modern Slavery') within our supply chains. We recognise that Modern Slavery is a global issue and can affect many sectors and industries and we take our obligations very seriously.

Our company structure and business

Avon is the UK based parent company of a group of companies with operations in the UK, US, China, Brazil and Italy (the 'Group'). This statement covers all companies within the Group. Avon is an innovative design and engineering group specialising in two core businesses, Protection & Defence and Dairy. Avon has over 800 employees worldwide and in the financial year ended 30 September 2017 reported a global annual turnover in excess of £160 million.

Our policies

As confirmed in our Code of Conduct ('the Code'), applicable to everyone acting for or on behalf of Avon, we are committed to ensuring we conduct all business dealings and relationships with honesty and integrity in accordance with applicable laws and regulations. The Code confirms that Avon is fully committed to respecting the human rights of all those working with or for us and explains that Avon does not accept any form of child or forced labour.

We will not do business with anyone who fails to uphold these standards. We are in the process of updating our Code of Conduct, which will specifically address the requirement for compliance with modern slavery and human trafficking legislation and the updated version will be issued to all Avon suppliers and Avon employees.

Due diligence process

Each of the Group's businesses are responsible for undertaking appropriate due diligence on respective suppliers. Each time an agreement is entered into with a new supplier, they are required to complete a Modern Slavery self-assessment questionnaire so Avon can assess their risk of Modern Slavery and they are also asked to sign a statement of compliance. We carry out a review of the self-assessment questionnaire responses and if the supplier is deemed to be at high risk of Modern Slavery from the results of the questionnaire, we suggest that changes are made by the supplier in order to achieve compliance with our Human Rights Principles. We 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 have identified all suppliers that we use and we keep detailed records of each supplier. We also recognise the importance of building long-term relationships with our suppliers and making clear our expectations in relation to Modern Slavery.

Employees and training

Our recruitment processes are in line with the applicable employment laws of the countries in which we operate and we use contracts of employment. When employing an individual, we conduct due diligence to ensure that the individual is not subject to Modern Slavery and ensure that we only use reputable recruitment agencies.



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confidentially through the 'Speak Up' button on our intranet.

This statement has been approved by the Board of Avon Rubber p.l.c.

Signed

A handwritten signature in black ink that reads "Paul McDonald". The signature is written in a cursive, slightly slanted style.

Paul McDonald
CEO, Avon Rubber p.l.c.
April 2018

To ensure a high level of understanding of the risks of Modern Slavery in our supply chains and our business, our Code of Conduct is being updated to explicitly include reference to slavery and human trafficking. We will also develop a training programme for those employees involved in procurement and/or with responsibility for supply chain management to raise awareness of the issues of Modern Slavery and to help identify and mitigate potential Modern Slavery risks in Avon's global supply chain.

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