Code of Conduct
2018
AN INTRODUCTION FROM OUR CHAIRMAN

ABOUT THIS CODE OF CONDUCT

OUR PRINCIPLES

STANDARDS OF BEHAVIOUR

Individual Conduct
Conflicts of interest
Gifts and hospitality

COMPLIANCE WITH THE LAW

Bribery and corruption
Modern Slavery

U.S. FEDERAL PROCUREMENT REGULATIONS

FINANCIAL INTEGRITY AND RESPONSIBILITY

Insider dealing

TAX EVASION AND FACILITATING TAX EVASION

Political contributions

RELATIONSHIPS WITH THIRD PARTIES

Signing a contract
Agents, consultants and intermediaries
Government contracting

IMPORT, EXPORT AND TRADE CONTROLS

Sanctions

BUSINESS INTEGRITY AND CONFIDENTIALITY

Intellectual Property
Data Protection
Use of company property
Company communications
Use of Company Computers and Information Technology

EMPLOYEES

Harassment, bullying and discrimination
Drugs and alcohol
Human rights

HEALTH AND SAFETY

COMMUNITIES AND SOCIETY

ENVIRONMENT

GUIDANCE

SPEAK UP

How to raise a concern
What will we do about it?
Protection and support if you are not satisfied
Availability of advice

KEY CONTACTS

“We are, and want to be widely known as, a company that values and promotes ethical conduct and integrity.”
Dear Colleagues:

We take pride in the products we supply to our customers worldwide, but that is not all that matters to us. We are, and want to be widely known as, a company that values and promotes ethical conduct and integrity. One of the most valuable assets of the Avon group is its integrity. The trust of our stakeholders is at the core of a successful and sustainable business. Protecting this asset is the job of everyone in the company.

Our reputation as a company is upheld and enhanced or diminished by each person’s decisions, actions, and sense of business ethics. We expect our agents and representatives to have similar standards of ethics and conduct and we are committed to only working with third parties whose standards are consistent with our own.

The Board of Directors has established a Code of Conduct to help all of us, including the Board, comply with the law and maintain the highest standards of ethical conduct.

Our Code of Conduct sets out the values and standards of behaviour that we expect from everyone working for or on behalf of Avon and the principles by which Avon expects to conduct its business.

I believe this document helps us all to understand the behaviour expected of us in our work activity and, as stressed in previous years, no one will be prejudiced by adherence to the Code. The good reputation of our business and the trust of those who do business with us is hard won, but easily lost.

As you all know, our reputation is integral to our success, and for a global business like ours reputation comes from our actions on a continuous basis. Your performance in conducting our business in a manner that is consistent with the principles contained in the Code will enable us to keep and enhance that reputation.

Compliance with the spirit and letter of the Code of Conduct is a matter of individual responsibility, so please take the time to read and understand it. There are references throughout this document to group policies and who to contact for help, guidance and advice. I urge you to challenge any behaviour which falls short of our standards and if you have any concerns, please speak up.

If you have any questions, we encourage you to contact your manager or any of the key contacts listed in this document.

Thank you,

David Evans
Chairman
Our Principles

STANDARDS OF BEHAVIOUR
We strive to carry out our business activities in a way which will attract the respect of those we deal with, and which will not bring Avon’s reputation into disrepute.

COMPLIANCE WITH THE LAW
We will comply with all applicable domestic and international laws in the jurisdictions in which we operate.

FINANCIAL INTEGRITY AND RESPONSIBILITY
As a publicly traded company listed on the London Stock Exchange, there are specific regulatory requirements with which we must comply. We provide a true and fair view of Avon’s assets, liabilities, financial position and profit or loss. We must ensure that all our financial records are complete and accurate and that we maintain robust systems of internal control.

RELATIONSHIPS WITH THIRD PARTIES
Relationships with third parties will be conducted within the law and we are committed to only working with third parties whose standards are consistent with our own.

IMPORT, EXPORT AND TRADE CONTROL
Avon’s success depends on our ability to conduct business in the international marketplace. The nature of our products and markets are such that export, import and trade laws and regulations affect a high proportion of our transactions. We must all understand the import and export controls related to our work and ensure that these are complied with.

BUSINESS INTEGRITY AND CONFIDENTIALITY
We all have a duty to protect and maintain Avon’s business integrity, including the protection of proprietary and confidential information and the responsible use of Avon property.

EMPLOYEES
Our success depends on our people. Avon recognises the value of its employees and is committed to equality of opportunity in all employment practices, policies and procedures. We will never tolerate harassment or bullying in any form.

HEALTH AND SAFETY
We will ensure the health, safety and welfare at work of our employees, contractors and visitors, together with the health and safety of other persons affected by our business activities.

COMMUNITIES AND SOCIETY
We are committed to being an economic, intellectual and social asset to each community in which we operate.

ENVIRONMENT
We consider protection of the environment and the environmental impact of our business to be an essential part of our business operations. We are committed to complying with all relevant legislation and to operating in an environmentally responsible manner.

SPEAK UP
If you see any behaviour at work that you feel may be a breach or a suspected breach of our Code of Conduct, or any unethical or illegal behaviour, it is very important that you report it. You can do so confidentially and without fear of retaliation.

More detail on these principles and where to find further information and guidance is provided on the following pages.
Standards of Behaviour

Our business dealings and relationships shall always be carried on in such a way that our international reputation is not damaged if the substance or details were to become public knowledge.

Avon operates around the world and 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 organization.

We strive to carry out our business activity in a way which will attract the respect of those we deal with, and which will not bring Avon’s reputation into disrepute. The good reputation of our business and the trust of those who do business with us is hard won, but easily lost.

INDIVIDUAL CONDUCT

We must all carefully consider our proposed courses of action in the light of the requirement to enhance, and not diminish, Avon’s reputation. Honesty, good faith and trustworthiness will continue to be respected and required characteristics of all Avon employees.

This Code of Conduct does not replace other more detailed policies, including our global and local HR policies and those specific to your role with which we must all comply. You are responsible for understanding and complying with the laws and policies that are relevant to your role and position in the Company.

If you think something doesn’t seem right or conflicts with our way of working, please speak up.

CONFLICTS OF INTEREST

As employees working for Avon, we have an obligation to always act in the best interest of Avon and avoid any conflicts of interest. A conflict of interest arises in the workplace where your position or responsibility within the business presents an opportunity for you to make a personal gain or benefit above your normal terms of employment. A conflict can also arise where your personal interests conflict with Avon’s business interests.

We must avoid any situation, which may lead to a potential or actual conflict between our own interest and Avon’s best interests.

In general, employment outside of Avon is prohibited. Before accepting part-time employment or fees for consultancy, directorships, or freelance activities, employees should first obtain the written approval of senior management.

If you find yourself in a position where your personal and business interests come into conflict, you are required to discuss this with your local HR representative or the Company Secretary/Legal department.

“We must avoid any situation, which may lead to a potential or actual conflict between our own interest and Avon’s best interests.”

GIFTS AND HOSPITALITY

We support the giving and receiving of bona fide, proportionate and reasonable gifts and hospitality as part of a normal business relationship. However, we never offer or accept gifts, payments or hospitality to encourage or reward a decision. The greater, more frequent or more lavish the hospitality, the greater the risk that it is aimed at inducing the person involved to perform a function improperly or influencing a public official in his official capacity. In order to minimise the possibility that the gift or corporate hospitality could be perceived as a bribe, it is best to provide such hospitality infrequently and to keep the value moderate. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret.

No employee or any member of his or her immediate family should make, accept or solicit gifts, entertainment, trips, discounts, loans, commission or other favours to or from third parties dealing with Avon if they could influence or appear to influence a business decision or be considered to be extravagant or unduly frequent.

Save for token gifts with a value of less than £50/$80, or corporate hospitality with a value of less than £150/$250 per person, all gifts/hospitality which are proposed to be made or accepted should be signed off in advance by senior management and recorded in the Gifts and Hospitality Register, a link to which can be found on the ACE home page. It is good practice to record all gifts/hospitality that you have been offered, even if they are declined, to ensure transparency if impropriety is alleged.

The offer or acceptance of a gift to or from government officials or representatives, or politicians or political parties is prohibited without prior approval from your manager or the Company Secretary.

There are different legal requirements in how we manage this issue dependent on location and customer. We are all responsible for knowing what is permitted in our own country of operation regarding gifts and benefits given to or received from government officials, customers, suppliers or other third parties. If we are unsure, then we should always seek guidance before taking further action.

Further Information: Please see the Gifts and Hospitality Policy
Compliance with the Law

We will comply with all applicable domestic and international laws in the jurisdictions in which we operate.

You are not expected to be an expert or to know the details of every legal requirement applicable to Avon in your jurisdiction, but you are responsible for understanding the basic legal requirements applicable to your role. Avon is obligated to take action to prevent and detect criminal conduct so your compliance with laws is critical.

If you have any doubt whether your conduct, or the conduct of a colleague or your business unit complies with the law, guidance should be sought from your manager, the Human Resources department or the Legal department.

BRIBERY AND CORRUPTION

Avon takes a zero-tolerance approach to bribery and corruption. Even the suggestion of corruption may damage our reputation and affect our ability to do business. Avon is committed to acting professionally, fairly and with integrity in all its business dealings and relationships. Wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

A bribe can come in many forms, it does not necessarily have to be of large value and may not be in the form of cash. A bribe includes any direct or indirect payment, benefit or gift offered, given or received with the purpose of improperly influencing a decision or outcome.

Facilitation payments are usually small unofficial payments to government officials to speed up a routine action which that person is already obliged to perform, for example, to a customs official requesting a payment or gift to release imported goods or to process a visa application faster.

We do not offer, give or receive any payment, benefit or gift which is intended to be, or may be construed as, a bribe whether directly or through a third party. Avon consider facilitation payments to be bribes and are therefore prohibited in all circumstances. These rules not only apply to Avon employees, but to all those acting on behalf of Avon's businesses such as agents, distributors, suppliers, representatives and intermediaries.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977. Bribery is unlawful and involvement of any employee in giving, offering, requesting or accepting bribes constitutes gross misconduct and would result in dismissal and potentially, prosecution and fines. You must report any instances of suspected bribery or fraud immediately.

U.S. FEDERAL PROCUREMENT REGULATIONS

A significant portion of Avon’s business comes from the U.S. Department of Defense and other U.S. federal agencies. As a result, it is imperative that we comply with all applicable contract and procurement regulations associated with these contracts. Of particular note is the requirement of the Federal Acquisition Regulations (FAR) for Avon to have a Contractor Code of Business Ethics and Conduct. This document represents our compliance with this requirement. Additionally, Avon is required to post certain notifications of applicable federal laws and available hotlines. These posting can be found in centralised shared locations such as break rooms and employee entrances at Avon’s U.S. sites.

Further information and guidance on what to do if you are faced with a request for a bribe/facilitation payment can be found in the Anti-Bribery and Corruption Policy. If in doubt, discuss with the Legal Department.

MODERN SLAVERY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

We are committed to ensuring that slavery and human trafficking does not exist in either our business operations or supply chain. The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. We do not accept any form of child or forced labour and will not do business with anyone who fails to uphold these standards.

Further Information: Our policy statement on Modern Slavery is available on our website at www.avon-rubber.com. If you have any concerns, please contact the Legal Department, or via the Speak Up button on ACE.
Financial Integrity

As a publicly traded company listed on the London Stock Exchange there are specific requirements that apply to us. We provide a true and fair view of Avon’s assets, liabilities, financial position and profit or loss. Compliance with prescribed accounting systems and rules is mandatory to ensure that the accounts at all times accurately reflect, properly describe and promptly record the transactions undertaken. No secret or unrecorded liabilities, funds of money, accounts or other assets may be established or maintained.

Everyone at Avon, not just those in a finance role, is responsible for ensuring that our financial and other reports and records are complete and accurate and for making sure company money is appropriately spent. We are all responsible for protecting against misuse of Avon’s funds and assets. The money we spend at Avon ultimately belongs to our shareholders. You should only ever spend company money where there is a legitimate business need and with the necessary approval in place. You should know the local expenditure limits and financial policies that directly apply to your role.

INSIDER DEALING

Avon is a publicly owned company listed on the London Stock Exchange. The share price of a listed company is affected by a number of factors, usually associated with its financial and commercial performance. Occasionally you may receive confidential information about the financial performance or future plans of Avon which if made public, may have an effect on the value of our share price. This information is commonly known as ‘inside information’. You should not buy or sell Avon shares (or those of any listed company), or encourage others to do so if you are in possession of inside information. In addition, inside information should never be disclosed to anyone else – whether to other employees, family members, friends or business associates without the prior written approval of the Group Executive.

Trading in shares based on material non-public information, or providing information to others so they may trade is illegal and may result in criminal prosecution. When in doubt over whether you may trade in Avon shares, please speak to the Company Secretary.

During ‘close periods’ dealing in Avon shares is restricted. All employees to whom this applies will be notified in advance by the Company Secretary.

For more information on insider trading and close periods, please speak to the Company Secretary.

TAX EVASION AND FACILITATING TAX EVASION

Tax evasion is the illegal and fraudulent non-payment of tax, usually resulting from the making of a false declaration or no declaration at all of taxes due to the relevant tax authorities. We never engage in tax evasion or facilitate tax evasion by assisting anyone else to do so.

Tax evasion and the facilitation of tax evasion constitute criminal conduct and can have severe penalties, both for the individual responsible and for Avon.

You must always ensure you fully comply with your tax obligations. If you are ever in doubt about whether something you have been asked to do in relation to taxation (by a colleague or third party) is appropriate, then seek advice from your local Finance team or the Corporate Finance Team. Further Information: See the Anti-Facilitation of Tax Evasion Policy or contact your local finance team.

POLITICAL CONTRIBUTIONS

Avon may make donations or contributions to political parties, parties officials, party representatives or candidates only if allowed by the laws and regulations of the country concerned and in accordance with the applicable provisions thereof, including requirements of public disclosure of such donations or contributions. Any such donations and contributions shall be authorised in each case in advance by the Board of Directors and shall be properly recorded in the company’s books and accounts. Any question as to whether a proposed payment will or could be regarded as a political contribution should be directed to the Company Secretary.

Further Information: Please discuss with the Legal Department

Relationships with Third Parties

Relationships with third parties will be conducted within the law and we are committed to only working with third parties whose standards are consistent with our own.

For the purposes of this section, third parties include, customers, suppliers, Government departments and officials, elected representatives, consultants, agents, distributors and advisers.

SIGNING A CONTRACT

Each time you enter into a business transaction on Avon’s behalf, there should be a legally binding agreement with written terms and conditions in place recording that agreement. Without this, Avon is open to financial, commercial, tax and legal risks. You must not commit Avon to a contract or incur expenses without appropriate authorisation. It is worth remembering that all employees are able to sign legal agreements on Avon’s behalf with line manager approval and there is no rule that only directors or officers of our subsidiaries can sign.

Never sign a contract on Avon’s behalf unless you are authorised to do so and you have carefully reviewed and understood its terms and decided that entering into it is in Avon’s best interests.

AGENTS, CONSULTANTS AND INTERMEDIARIES

Agents, consultants and intermediaries are an effective means of developing, expanding and maintaining business. However, if not carefully selected or if inappropriately managed, agents, consultants or intermediaries can considerably harm the Company’s reputation and may trigger local legal proceedings, even if the Company is unaware of any impropriety.

We must only use agents, consultants or intermediaries if they are known to act to standards consistent with our Code of Conduct, particularly in relation to bribery and corruption.

When considering a potential agent, consultant or intermediary and before concluding any appointment or dealing in any way with a candidate, you must conduct a thorough due diligence examination taking into account experience, background and reputation. Particular care should be taken in relation to those appointed in countries which have a low score on the Transparency International Corruption Perceptions Index (http://cpi.transparency.org/cpi2013/). The legal department will review the due diligence conducted, the location of the agent and determine whether additional checks may be required.

A signed written agreement approved by the Legal Department must be in place before the agent, consultant or intermediary carries out any work for us and shall contain a provision whereby the latter commits to comply at all times with the provisions of this Code and that no part of any payment originating from Avon will be passed on as a bribe. Breach of this commitment shall entitle us to terminate the agreement immediately.

GOVERNMENT CONTRACTING

We are committed to strictly observing the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Such performance includes ensuring that Avon does not make any false claims for payment through ensuring accurate record keeping and compliance with government contract requirements. Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with a government. The penalties of failing to adhere to these laws are severe and include substantial civil and criminal fines and imprisonment and in extreme cases we could be prohibited from doing business with the government.

If your responsibilities include interacting with the government, you are expected to understand and comply with the special laws, rules and regulations that apply to government contracting and interactions with government officials and employees. If you are in any doubt about whether a course of action is lawful, you should seek advice immediately from your supervisor and the Contracts and Compliance Officer.

Further Information: Please speak to the Legal Department
Import, Export and Trade Controls

Avon’s success depends on our ability to conduct business in the international marketplace. The nature of our products and markets are such that export, import and trade laws and regulations affect a high proportion of our transactions. Therefore, we must all understand the import and export controls related to our work and ensure these are complied with.

Failure to comply with the regulations could result in serious penalties for the company and for the individuals concerned, as well as the loss of our import/export privileges.

We will comply with all trade control laws wherever we do business and make sure we get all necessary import and export licenses and provide customs with accurate information.

The following key pieces of legislation are applicable to our products:

- UK: Export Control Act 2002
- US: The International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR)

If you are involved in the transfer of goods, technology, services or data you must make sure you understand the laws and regulations that apply. If you are in any doubt, ask the Legal department to help you.

SANCTIONS

We comply with trade sanctions and restrictions issued by recognised authorities, including the European Union and the United States, which are designed to prevent or limit trading with certain countries or their nationals. If you are involved with a transaction that potentially involves a sanctioned country, entity or person, you must ensure that due diligence is carried out in advance of entering into the transaction and get prior approval from the Legal Department.

Further information: Please contact the Legal Department

“We will comply with all trade control laws wherever we do business and make sure we get all necessary import and export licenses and provide customs with accurate information.”
We all have a duty to protect and maintain Avon’s proprietary and confidential information. Confidential information is essentially everything that is not available in the public domain. Our trade secrets and other sensitive commercial information should be kept confidential. Improper disclosure of confidential information can destroy its value and damage the trust others have in us.

This might include:

• Any trade secret or secret manufacturing process or other intellectual property or any confidential information concerning the business or finances of Avon.
• Information specifically designated as confidential by Avon.
• Information regarding customers, suppliers, agents or distributors, technical and financial details, business methods, plans, management systems, new business opportunities, research and development projects, manufacturing drawings, sales targets and statistics, market share and pricing statistics, marketing surveys and plans, market research reports, market strategies, sales techniques, discount structures, advertising and promotional materials.
• Information to which Avon owes an obligation of confidence to a third party.
• Personal information about employees and their relationship with Avon.
• Information is not regarded as confidential if it is in the public domain.

Avon employees are obliged to protect our non-public information at all times, including outside of the workplace and working hours and even after your employment with Avon ends.

Avon’s confidential information should not be disclosed outside Avon without approval from senior management. We must make sure that, if we are disclosing confidential information outside of Avon, that this is on a ‘need to know’ basis and only under a confidentiality agreement.

Confidential information belonging to customers or other third parties must be respected and protected in the same way.

Further information Please see the Group IP Manual or speak to the Legal department.

INTELLECTUAL PROPERTY

Intellectual Property assets and rights play an important role in enabling us to retain a competitive edge and derive value from continued investment in innovation.

IP includes patent rights, trademarks, copyright, design rights, rights in know-how or other confidential information (sometimes called ‘trade secrets’ or ‘proprietary information’).

Avon generally owns all rights to any IP created, updated and maintained by you during your employment. We must all give proper attention to creating, protecting and exploiting our IP and to avoid the infringement of the IP rights of others.

Further Information: Please see the Group IP Manual

DATA PROTECTION

We comply with all applicable data protection laws and regulations. Avon only collects and retains personal data for legitimate business purposes. Personal data is any information related to an identifiable individual that can be used to directly or indirectly identify the person. We all play a role in protecting personal information in our care and must ensure that it is kept securely to prevent loss, disclosure or misuse. You should only gather, use and keep personal information if you have a legitimate reason to do so on behalf of the Company.

Further Information: Please see our Data Protection Policy

USE OF COMPANY COMPUTERS AND INFORMATION TECHNOLOGY

Our computer systems and the information they contain are valuable assets. We are all responsible for helping to maintain the integrity, reliability and security of the company’s computer systems and the information they contain.

We must not use company computer systems to access, obtain, create or distribute any material that's illegal or offensive. Each user is responsible for using these resources and systems in a productive, ethical and lawful manner.

Personal use of company IT systems is permitted, if it is reasonable and appropriate and does not interfere with your employment responsibilities or productivity. Personal use is a privilege not a right, and must not be overused or abused. We may withdraw permission for it at any time or restrict access at our discretion. We should all be aware that subject to local law, the company reserves the right to monitor our emails and internet usage, whether work-related or personal and employees should have no expectation of privacy in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind or form of information or communication transmitted to, received or printed from, or stored or recorded on the company’s electronic information and communications systems.

Further information: Please see the Global IT policy, or speak to your local IT department

COMPANY COMMUNICATIONS

You should never communicate on behalf of Avon unless you are authorised to do so. Ensure that all company communications and disclosure have received prior internal approval, if in doubt, speak to your local marketing team and take care not to express your personal views in a way that they may be interpreted as Avon’s views.

We must also remember that e-mails to external parties have the same effect in law as other forms of written communication. We must be careful not to not send e-mails or other electronic communications which make representations, contractual commitments or any other form of statement concerning Avon unless we are authorised to do so.

It is also important to remember that our internal communications can, at the press of a button become external communications.

Further information: Please speak to your local marketing team.

“We all play a role in protecting personal information in our care and must ensure that it is kept securely to prevent loss, disclosure or misuse.”
We are committed to being an economic, intellectual and social asset to each community in which we operate. We operate a Charitable Giving Policy under which all employees can apply for the company to support charitable causes in their local community.

At many of our sites we are the largest employer in the local area and we aim to strengthen and support the communities where our employees live and work. We actively encourage all our employees, teams and sites to engage positively with the local community.

Further information: Please see the Community area on ACE under Great Place to Work.

“We will not tolerate anyone being under the influence of alcohol or illegal drugs in the workplace.”

Health and Safety

Not only does a safe working environment contribute to employee well-being, but the prevention of accidents and personal injury contributes to the running of an efficient business. We will ensure the health, safety and welfare at our facilities for our employees, contractors and visitors, together with the health and safety of all other persons affected by our business activities.

We encourage all employees to take an active role in ensuring the working environment is safe for ourselves, our colleagues and visitors and to promptly report anything you believe may be unsafe.

Further information: Please consult your local Health and Safety policy.
Guidance

All employees are encouraged to seek guidance and assistance as appropriate. If you find yourself in a situation and are unsure of the right course of action, then asking some simple questions may help guide you:

- Is it legal?
- Is it ethical?
- Is the situation in conflict with the principles in our Code?
- Would I be able to explain the situation and my actions to my family and friends?
- Would I feel comfortable if it appeared in the media?

If you still feel that you do not know the right course of action to take or you do not understand anything contained in this Code, then you are encouraged in the first instance to speak to one of the following to ask for help:

- Your manager in the first instance
- Your local Human Resources department
- The Legal Department

Details of how you can report any concerns or what to do if you suspect someone is acting in breach of the Code are contained in the Speak Up section at the end of this document.

Speak Up

The Code cannot address every possible situation that may arise in the work environment. The principles are no substitute for common sense and proper internal consultation.

All organisations face the risk of things going wrong from time to time, or of unknowingly permitting illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

If you see any behaviour at work that you feel may be a breach or a suspected breach of our Code of Conduct, or any unethical or illegal behaviour, please report it.

HOW TO RAISE A CONCERN

You should in most cases be able to raise any concerns with your manager or supervisor. You may tell them in person or put the matter in writing if you prefer. If that is not appropriate, or you do not feel comfortable speaking to your manager, you can report your concerns to your HR representative or to any of the key contacts listed at the end of this document.

Alternatively, you can report your concern confidentially through the ‘Speak Up’ button on our intranet, ACE, which will be reviewed directly by the Company Secretary.

We hope that you will feel able to voice your concerns openly and without fear of retaliation. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

WHAT WILL WE DO ABOUT IT?

All issues raised will be taken seriously and will be followed up conscientiously and impartially.

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Should our internal investigation identify that certain government laws or regulations have been violated (e.g. U.S. False Claims Act), Avon will have a legal obligation to report the violation to the government. Such reporting shall be conducted per the applicable regulation, rule, and/or law. Additionally, appropriate disciplinary action will be taken to address the improper conduct or failure to take reasonable steps to prevent or detect the improper conduct resulting in the violation.

IF YOU ARE NOT SATISFIED

While we cannot always guarantee the outcome you would like, we will try to deal with your concern fairly and in an appropriate way.

If you are not happy with the way in which your concern has been handled, you can raise it confidentially with one of the key contacts listed at the end of this document. Alternatively, you may contact the Chairman of the Audit Committee directly, contact details are at the end of this document.

PROTECTION AND SUPPORT

Anyone who raises a concern in good faith will be treated fairly and justly and will be protected from retaliation in any form. If you believe you or anyone else is experiencing retaliation or discrimination, don’t put up with it; report it at once. We will regard any such behaviour as a serious matter and anyone who tries to undermine this commitment can expect to be disciplined.

AVAILABILITY OF ADVICE

This Code of Conduct is intended to assist employees to act in accordance with the standards laid down in it. It is recognised that many situations may arise where employees are uncertain whether a proposed course of action would comply with the Code. In such cases employees are requested to discuss the position either with their manager, the Company Secretary or with a member of the Legal Department, as appropriate. These requests for advice will always be treated on a confidential basis, providing the request for advice is made before any breach of the Code has taken place. We would always prefer to learn of a potential issue in advance, than to learn about it subsequently, when damage to our reputation may have already been done.

If you have any concerns or need advice and guidance please seek help.
## Key Contacts

Names and addresses of individuals and departments who may need to receive reports or who can give advice in relation to the operation of the Code:

### Avon Rubber p.l.c.
Hampton Park West, Semington Road, Melksham, Wiltshire, SN12 6NB, UK

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Phone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>CHIEF EXECUTIVE</td>
<td>Paul McDonald</td>
<td>+44 (0) 1225 896 800</td>
<td><a href="mailto:Paul.McDonald@avon-rubber.com">Paul.McDonald@avon-rubber.com</a></td>
</tr>
<tr>
<td>CHIEF FINANCIAL OFFICER</td>
<td>Nick Keveth</td>
<td>+44 (0) 1225 896 300</td>
<td><a href="mailto:Nick.Keveth@avon-rubber.com">Nick.Keveth@avon-rubber.com</a></td>
</tr>
<tr>
<td>COMPANY SECRETARY AND GROUP COUNSEL, HUMAN RESOURCES LEAD</td>
<td>Miles Ingrey-Counter</td>
<td>+44 (0) 1225 896 810</td>
<td><a href="mailto:Miles.Ingrey-Counter@avon-rubber.com">Miles.Ingrey-Counter@avon-rubber.com</a></td>
</tr>
<tr>
<td>DEPUTY CHIEF FINANCIAL OFFICER</td>
<td>Ryan Mahoney</td>
<td>+44 (0) 1225 896 839</td>
<td><a href="mailto:Ryan.Mahoney@avon-rubber.com">Ryan.Mahoney@avon-rubber.com</a></td>
</tr>
</tbody>
</table>

### Avon Protection
1361 Brass Mill Road, Suite F, Belcamp, Maryland 21017, USA

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Phone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>VICE PRESIDENT CONTRACTS AND COMPLIANCE/ITAR EMPOWERED OFFICIAL</td>
<td>Jill McClune</td>
<td>+1 410 273 1187</td>
<td><a href="mailto:jill.mcclune@avon-rubber.com">jill.mcclune@avon-rubber.com</a></td>
</tr>
</tbody>
</table>

### Independent Board Director contact:

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>NON-EXECUTIVE DIRECTOR</td>
<td>Chloe Ponsonby</td>
<td><a href="mailto:Chloe.Ponsonby@avon-rubber.com">Chloe.Ponsonby@avon-rubber.com</a></td>
</tr>
</tbody>
</table>