

## Avon Modern Slavery Statement 2018

**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. and its subsidiaries (together Avon) during the year ending 30 September 2018 to prevent modern slavery and human trafficking in our supply chains.**

### Introduction

This statement sets out the steps that Avon has taken during the 2018 financial year to ensure compliance with the Modern Slavery Act 2015 and identifies the steps that we intend to take in the coming financial year.

### 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 2018 reported a global annual turnover in excess of £165m.

### 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 have recently updated our Code of Conduct ('the Code'), which is applicable to everyone acting for or on behalf of Avon, to specifically address the requirement for compliance with modern slavery and human trafficking legislation and this updated version has been reissued to all Avon employees.

The Code also 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 and that Avon will not do business with anyone who fails to uphold these standards.

### Due diligence process

Each of the Group's businesses continue to be responsible for undertaking appropriate due diligence on respective suppliers. 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 the suggestion that the supplier 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.

### Contracts

In the last year we have reviewed and updated our standard global purchasing terms and conditions to include specific reference to modern slavery legislation and Avon's Code of Conduct. This is to further ensure that our policy on Modern Slavery is embedded into the procurement process.



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## **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 only use reputable recruitment agencies and we conduct due diligence to ensure that the individual is not subject to Modern Slavery.

To raise awareness of the issues of Modern Slavery, our Code of Conduct now explicitly includes reference to modern slavery and human trafficking. We are in the process of developing a training programme for those employees involved in procurement and/or with responsibility for supply chain management. This will 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 confidentially through the 'Speak Up' button on our intranet.

This statement has been approved by the Board of Avon Rubber p.l.c. and Avon Polymer Products Limited.

Signed

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

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