

Avon Modern Slavery Statement 2019

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 2019.

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, 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 2019 reported a global annual turnover in excess of £179m.

Our policies

Avon has a zero tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking ('Modern Slavery') within our supply chains. Our Code of Conduct ('the Code'), which is applicable 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 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.

Suppliers

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.



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Employees

Our recruitment processes are in line with the applicable employment laws of the countries in which we operate. 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 throughout the business we have circulated an internal communication to all employees explaining what Modern Slavery is, the potential warning signs and who can be contacted with any concerns.

Whistleblowing

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. There were no reports of slavery or human trafficking in 2019.

This statement was approved by the Board of Avon Rubber p.l.c. on 7 November 2019 and signed on its behalf by:



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

