

## **Avon Protection plc Modern Slavery Statement 2022**

**This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Avon Protection plc's slavery and human trafficking statement for the period ending 30 September 2022.**

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

### **Our company structure and business**

Avon Protection plc ('Avon Protection') is the UK-based parent company of a group of companies with operations in the UK and USA (the 'Group'). This statement covers all companies within the Group. Avon Protection 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 subcontracted workers to carry out specific tasks. In the financial period ended 30 September 2022 Avon Protection reported a global annual turnover in excess of £250m.

At Avon Protection, 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.

In its governance of Avon Protection, the Board has overall responsibility for setting the Group's sustainability agenda. During the year, a Sustainability Steering Committee was established with responsibility for delivery and implementation of the sustainability agenda on behalf of the Board. Our sustainability agenda, the 'Impact Plan' has 4 key pillars: 1) Environmental Impact; 2) Sustainable Supply Chains; 3) Cybersecurity & Data Protection and 4) Employee-Centric approach. Ensuring that the business operates in an ethical way and that the risks of modern slavery are mitigated is a key part of both the Sustainable Supply Chains and Employee-Centric approach pillars. In addition, the Board's Audit Committee has oversight of key areas of business risk including modern slavery and considers how best to address these at its regular meetings as part of the risk management process.

### **Our policies**

Avon Protection 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 conducting our business in a sustainable and responsible way and promoting respect for human rights wherever we operate. 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'), applies to everyone acting for or on behalf of Avon Protection and specifically addresses the requirement for compliance with modern slavery and human trafficking legislation. During FY22 the Code has been updated and re-issued to all employees in conjunction with the roll out of an awareness-raising campaign. The Code also makes it clear that Avon Protection does not accept any form of child or forced labour and will not do business with anyone who fails to uphold these standards.

Our Supplier Code of Conduct clearly sets out Avon Protection's expectations within our supply chain, including in relation to modern slavery, human rights and business ethics. In doing business with us, each of our suppliers undertakes that it shall maintain policies and procedures governing its business which ensure it complies with this code.

### **Suppliers**

Each of the Group's businesses continues to be responsible for undertaking appropriate due diligence on respective suppliers located world-wide. We understand that heightened risks may come from engaging with suppliers in certain regions and we therefore adapt our checks accordingly. We engage each of our suppliers on the basis that it 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 human rights or modern slavery legislation.

Avon Protection requires all new suppliers to complete a survey and sign a statement of compliance covering various non-financial risks which includes a modern slavery self-assessment questionnaire. The responses are reviewed and if a significant risk is identified, an additional review process is undertaken which may include notifying the supplier that they must implement changes to achieve compliance with our human rights principles, in order to work with Avon Protection.

We monitor our suppliers' compliance on an ongoing basis and reserve the right to audit any supplier considered high risk. We maintain the ability to terminate any business relationship where concerns cannot be adequately addressed.

We continue to keep detailed records of each supplier that we use and 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 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 Protection, our suppliers and controlled joint ventures wherever they are based.

We continue to review and develop modern slavery training needs and raise awareness throughout the business through internal communications to all employees explaining what modern slavery is, the potential warning signs and who can be contacted with any concerns. During FY22 we have invested in enhancing our training capabilities and will be initiating mandatory e-learning modules on modern slavery and related topics.

### **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. Each of our employees received a written contract or letter as applicable in their jurisdiction, clearly indicating their rights and responsibilities. We do not retain any of our employees' identification documents nor prevent any access to such documentation unless required by applicable laws.

Where we work with third party recruitment service providers, we only use reputable recruitment agencies which are subject to our due diligence onboarding process.

### **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 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 2021.

## Looking Forward

During FY23 we plan to:

- Enhance existing due diligence for suppliers, partners and employees;
- Continue to ensure our employees all have access to our 'Speak Up' facility to report any grievances or concerns;
- Continue to raise awareness of Modern Slavery risks within Avon Protection through our enhanced compliance training platform;
- Further develop the key pillars under the Impact Plan with sustainability actions and objectives, to include those related to Avon Protection's business practices and the assessment and mitigation of our Modern Slavery risks.
- Take other measures as appropriate to mitigate risks of Modern Slavery within our business.

This statement was approved by the Board of Avon Protection plc on 17 November 2022 and signed on its behalf by:



**Bruce Thompson**  
**Chair**  
**Avon Protection plc**