

Avon Technologies plc

Modern Slavery Statement 2024

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes Avon Technologies plc's slavery and human trafficking statement for the year ending 30 September 2024.

This statement sets out the actions Avon is taking 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 Technologies plc ('Avon') 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 is an innovative design and engineering group, which through its Avon Protection and Team Wendy businesses, designs and produces specialist life critical personal respiratory and head protection systems for the world's militaries and first responders. We have over 900 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 year ended 30 September 2024 Avon reported a global annual turnover in excess of £274m.

At Avon, 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, the Board has overall responsibility for the Group's corporate social responsibility ('CSR') strategy. Our CSR strategy has 3 pillars: 1) People; 2) Process and 3) Product; each pillar is underpinned by governance designed to ensure we do business responsibly and ethically and that risks of modern slavery are mitigated. An executive steering committee meets quarterly to oversee the delivery and implementation of our CSR strategy on behalf of the Board. In addition, the Board's Audit Committee oversees key areas of business risk including modern slavery as part of the risk management process.

Our policies

Avon has a zero-tolerance approach to slavery, servitude, forced or compulsory labour and human trafficking ('modern slavery') within our operations and those of 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 high standards of ethical behaviour.

Our Company Code of Conduct (the 'Code'), applies to everyone acting for or on behalf of Avon and specifically addresses the requirement for compliance with modern slavery legislation. The Code also makes it clear that Avon does not accept any form of child or forced labour and will not do business with anyone who fails to uphold these standards.

A separate Supplier Code of Conduct sets out our expectations for our supply chain, including in relation to human rights and compliance with laws and regulations. During FY24 the Supplier Code of Conduct was reviewed and re-issued, and the policy has been added to our website for easier access. We expect suppliers to conduct their business in a way that is compatible with the Supplier Code of Conduct, and we encourage suppliers to implement their own Code of Conduct for their employees and to cascade this throughout their own supply chain.

Suppliers

Each of the Group's business units continues to be responsible for undertaking appropriate due diligence on prospective suppliers wherever they are located. We understand that heightened risks may come from engaging with suppliers in certain regions of the world and we therefore adapt our checks accordingly. We engage each of our suppliers on the basis that they will not, and will ensure that their 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 requires all new suppliers to complete a survey and statement of compliance covering various non-financial risks which include a modern slavery self-assessment questionnaire. The responses are reviewed and if a material risk is identified, an additional review is undertaken which may include requiring the supplier to implement changes in order to work with Avon. We maintain the ability to terminate any business relationship where our concerns cannot be adequately addressed.

We continually monitor our suppliers' compliance and reserve the right to audit any supplier considered high risk. During FY24 we launched a sustainability questionnaire which requested information from existing suppliers on whether they have policies in place to address environmental, social and governance risks including modern slavery and human rights.

We continue to maintain detailed records of each supplier and recognise the importance of building long-term relationships with our suppliers. Making clear our expectations in relation to modern slavery is part of this.

Training and Effectiveness

Our Code sets out our expectations on ethical conduct and we offer support to employees to help them understand the right thing to do. Compliance with our Code is mandatory for all employees and directors of Avon and our suppliers wherever they are based.

We continue to review and develop modern slavery training and raise awareness throughout the business through mandatory annual Code of Conduct training which helps employees understand their role in upholding these principles and how to raise concerns.

Employees

Our Code makes clear to employees the actions and behaviours expected of them when representing Avon. 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 are carried out. Each of our employees receives a written contract or letter as applicable, 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 their direct activities, or the supply chains of our organisation. Our whistleblowing procedure is designed to make it easy for workers to make disclosures on a confidential basis 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 supplier base, we would act immediately to work with the supplier and relevant authorities to understand the circumstances 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 2024.

Looking Forward

During FY25 we plan to:

- Continue to monitor the effectiveness of due diligence for suppliers, partners and employees;
- Use responses from the supplier sustainability questionnaires to assess baseline modern slavery policies and determine whether any further action is needed by us to encourage the supply chain to adopt ethical practices;
- Improve access to our 'Speak Up' facility and conduct internal campaigns to ensure all our employees are aware of how to report any concerns;
- Continue to raise awareness of modern slavery risks within Avon through our annual Code of Conduct training;
- Further develop business practices to support our CSR strategy and governance therein, including those related to assessment and mitigation of modern slavery risk.
- Take other measures as appropriate to mitigate the risk of modern slavery within our business.

This statement was approved by the Board of Avon Technologies plc on 8 November 2024 and signed on its behalf by:



Bruce Thompson
Chair
Avon Technologies plc