

Supplier Code of Conduct

Our Supplier Code of Conduct (the “Code”) sets out our expectations of the standards of behaviour of our suppliers and business partners, as well as reflects our own Group-wide standards. We operate around the world, and we pride ourselves on our reputation for acting fairly and ethically wherever we do business. Regardless of geographic location, we expect our suppliers to conduct their business in a way that is compatible with this Code.

The Code applies to all suppliers of both of our businesses, Avon Protection and Team Wendy, and is treated as part of the supply contract. It is an essential tool that outlines the guidelines, expectations and policies. If we become aware of non-compliance with this Code, we will work collaboratively to address concerns but ultimately, in cases of a serious or un-remedied breach, we may review its business relationship with the supplier concerned.

Suppliers are encouraged to implement their own Code of Conduct for their employees and to cascade this throughout their own supply chain.

Governance

Compliance with laws and regulations

As a minimum, we require our suppliers to always conduct their business in accordance with all applicable domestic and international laws and regulations, including labour and environmental laws.

Anti-bribery & Corruption

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all of our business dealings and relationships and expects our suppliers to act with honesty and integrity. A bribe can include any direct or indirect payment, benefit or gift offered, given or received with the purpose of improperly influencing a decision. In addition, suppliers are expected to avoid any actual or perceived conflicts of interest and must comply with all applicable anti-corruption laws including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977, as amended, and other applicable local laws. Suppliers are expected to notify us if an actual or potential conflict of interest arises. Suppliers must ensure all relevant personnel are aware of the principles and controls contained in our [anti-bribery and corruption policy](#), which can be found on our website. Suppliers must have their own anti-bribery and corruption controls and provide appropriate training to relevant personnel.

We conduct due diligence on our customers and business partners, and suppliers are expected to undertake their own reasonable checks to prevent and detect corruption within their own business and supply chains.

Financial Integrity

Tax evasion is the illegal and fraudulent non-payment of tax. We will never engage in or facilitate tax evasion and expects the same standards of our suppliers. This also extends to any form of financial fraud or deception. We expect our suppliers to maintain accurate financial records and transparently report information relating to their business to the appropriate authorities.

Insurance

Suppliers must maintain insurance policies with reputable insurance companies against all risks that would normally be insured against by a prudent supplier in connection with the supply of products or services, including public, product and employer's liability insurance.

Import, Export and Trade Control

We comply with all trade control laws wherever we do business and ensure that all necessary import and export licenses are obtained, and that accurate information is provided to customs.

We expect that suppliers understand and work within the law and export controls. Suppliers must ensure that when delivering products to us, they always comply with all relevant import and export control requirements, trade sanctions and customs regulations.

Customer Requirements

We have many government customers, including the US Department of Defense and the UK Ministry of Defence. As one of our suppliers, it is likely that you must comply with customer flow-down or pass-through regulations. Compliance with these regulations and/or provisions is mandatory and a condition of any associated purchase order to ensure compliance with our customer requirements.

Information and Cybersecurity

It's vital to us that our suppliers ensure all sensitive data and information is appropriately protected.

All suppliers must adhere to the following cybersecurity principles:

- Suppliers must maintain the confidentiality, integrity, and availability of information assets entrusted to them. This includes implementing appropriate access controls, encryption mechanisms, and security protocols.
- In the event of a security breach, the incident must be reported to us within 72 hours.
- If we flow down information assets that have a classification marking, the supplier must not remove the marking and must comply with any applicable law, including Defense Federal Acquisition Regulations (DFAR 252.204-7012) which outlines the requirements for safeguarding covered defense information and cyber incident reporting.
- Suppliers should conduct regular risk assessments to identify potential cybersecurity threats and vulnerabilities. Proactive measures must be taken to mitigate these risks and prevent security incidents. We may require the supplier to complete annual Risk Management Assessments, which must be completed in the specified time.

Personal Data Protection

We comply with all applicable data protection laws and regulations. We only collect and retain 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. Read our [Privacy Policy](#).

We expect our suppliers to protect the reasonable privacy expectations of personal information of everyone they do business with and comply with applicable privacy and information security laws when personal information is collected, stored, processed, transmitted and shared.

Intellectual Property

Intellectual Property ('IP') 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'). Suppliers must give proper attention to protecting our IP and follow all obligations governed by non-disclosure agreements (NDAs). Information should be treated as confidential and only provided to employees on a need-to-know basis.

Counterfeit parts

Suppliers are expected to develop, implement and maintain effective methods and processes to minimise the risk of introducing counterfeit materials or components into our supply chain. In addition, suppliers shall provide notification to recipients of counterfeit parts and materials when required and exclude them from delivered products.

Quality

Suppliers shall take due care to ensure their work product meets applicable quality standards. We expect suppliers to have in place a Quality Management System ('QMS') or have adequate plans in place to implement certified quality assurance process to identify defects and corrective actions, and to facilitate the delivery of a product or service whose quality meets or exceeds the contract requirements.

Social

Human Rights

We are fully committed to respecting the human rights of all those working with or for us. We are committed to ensuring that slavery and human trafficking does not exist in either our business operations or supply chain and this includes any type of illegal child labor or forced labor. We do not accept any form of child or forced labor and will not do business with anyone who fails to uphold these standards.

We respect and comply with laws and treaties including the United Nations Declaration on Human Rights and the UK Modern Slavery Act 2015. Read our [Modern Slavery Statement](#).

Suppliers must:

- Treat all employees, suppliers and partners with fairness, dignity and respect.
- Not engage in modern slavery, child labour and human trafficking. Our suppliers will ensure these are not taking place in their own supply chains. We expect our suppliers, and everyone connected with our business to comply with all applicable laws and regulations (e.g., the Modern Slavery Act, Trafficking Victims Protection Act of 2000).
- Set employees' working hours and wages in compliance with all applicable laws.
- Suppliers must recognise and respect the rights of employees to exercise lawful rights of free association, and to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Diversity and Inclusion

We are committed to providing a working environment where everyone feels respected and valued. We all have the right to be treated with dignity and respect and to work in an environment that is free from all forms of negative behaviour including bullying, discrimination

and harassment. We will not tolerate discrimination in any form against anyone who works with us or for us on the grounds of protected characteristics - race, nationality, gender, sexual orientation, gender identity, marital status, religion, political beliefs, disability or age. We expect our suppliers to uphold these same values within their businesses and supply chains.

Health and Safety

We are committed to ensuring 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. Suppliers are expected to, as a minimum, comply with all applicable health and safety laws and ensure a safe working environment for their employees, contractors and visitors. Employees must also be provided with appropriate personal protective equipment, and adequate training.

Community

As a major employer in the areas we operate, community engagement is important to us and we have established community initiatives to support these aims including charitable giving. We are committed to being an economic, intellectual, and social asset and we encourage our suppliers to support their local communities.

Environment

We are committed to operating in an environmentally responsible manner and have committed to achieving net zero by 2045. We expect everyone working in Avon and our suppliers to use resources such as energy, water, and raw materials in a sustainable manner. We aim to minimise the impact of our operations on the environment and encourage our suppliers to prioritise acting in an environmentally sustainable manner to conserve natural resources. As a minimum, suppliers should comply with all applicable environmental, laws, regulations and standards, and maintain all required environmental permits and licenses.

We request that suppliers have in place an Environmental Management System (or plans to put one in place) which allows a business to improve in a structured way the environmental impact of its activities, products and services including approaches to reduction in waste generation, energy usage, water usage and greenhouse gas emissions.

We welcome and encourage initiatives from suppliers that help us to minimise our environmental impacts.

Raising Concerns

If suppliers have concerns regarding any of the matters covered in this Code, we expect them to bring these to our attention. Please contact us using the form which can be found [on our website](#) or by emailing enquiries@avon-protection.com.