



Welcome to  
**AVON TECHNOLOGIES PLC**

**Code of Conduct**

Updated: April 2026



# Our Code of Conduct

The way we do business matters just as much as the business we do. Our Code of Conduct sets the standards we expect from everyone who works for Avon Technologies or represents us in any capacity. It also defines what our customers, partners, and communities can expect from us.

This Code is more than a set of rules; it's a guide to doing the right thing. It helps us operate responsibly, make ethical decisions, and protect the reputation that underpins our success. At its heart are four pillars that shape how we work:

- ✓ **People and workplace culture** – fostering respect, inclusion, and wellbeing.
- ✓ **Acting with integrity** – ensuring honesty and fairness in all we do.
- ✓ **Protecting information, assets and technology** – safeguarding our information.
- ✓ **Responsible business and global impact** – making decisions that benefit society and the environment.

By being part of Avon Technologies plc, you commit to living by this Code and supporting others to do the same. If you see something wrong, have a concern, or need guidance, speak up. We all share responsibility for creating a culture that makes Avon a great place to work and a trusted partner worldwide.

Thank you for your commitment and for playing your part in our success.

**Jos Sclater**

Chief Executive Officer





# Using this Code of Conduct

## Scope and responsibilities

The Code applies to all employees, contractors, and representatives worldwide. We also expect our business partners to uphold similar standards. Everyone is responsible for understanding and following the Code and the policies that support it.

## Using the Code

The Code cannot cover every situation, but it provides the principles to help you make sound decisions. If you are unsure about the right course of action, seek guidance from your manager, HR, or the Legal Team.

When reading through the Code, begin with the “Do’s and Don’ts” to understand the key expectations and behaviours for each pillar. Then explore the corresponding ‘what we don’t do’ and ‘what we do’ pages, which show these principles in scenarios. Throughout the document, we’ve highlighted key insights and signposted where to find further resources and training.

## Breach of the Code

Any breach of this Code or its supporting policies will be treated as a serious matter. Managers must lead by example and ensure their teams understand and apply the Code.



### Training

Regular conversations about the Code help make our standards part of everyday work. You’ll complete training on the Code each year, with support from your manager.

If you’re a people manager, you will be expected to share the key messages with your team and create space for simple, open conversations about different scenarios, behaviours, and expectations outlined in the Code. These discussions help build a culture of integrity and good judgement.

To support these discussions, we’ve developed a Code Conversation Guide. You can find a link to it on the [Learning and Development](#) page on Atlas.





## PILLAR 1

# People and workplace culture

We are committed to maintaining a respectful workplace, keeping safety at the heart of everything we do, and consistently delivering quality in all aspects of our work.





## Respectful workplace

### What we do

- ✓ **Live our FIERCE values** every day – they guide everything we do.
- ✓ **Create a culture** of learning and collaboration where every voice matters and is respected.
- ✓ **Celebrate diversity** and guarantee equal opportunities for everyone.
- ✓ **Keep you informed** with updates on our vision, strategy, and any changes that affect our people.
- ✓ **Invite feedback** and fresh ideas – innovation starts with you.
- ✓ **Meet legal standards** including working hours and pay.
- ✓ **Use social media responsibly:** never post facility or employee images without permission, and avoid sharing personal opinions that could harm our reputation.

### What we don't do

- ✗ **Use forced labour**, child labour, or allow human trafficking in any part of our operations.
- ✗ **Tolerate violence**, harassment, bullying, or discrimination – these have absolutely no place in our workplace or with anyone we work alongside.
- ✗ **Retaliate** against employees for lawful activities outside of work, sharing feedback, discussing working conditions, or exercising their right to associate freely.

GEORGE, TREATING EVERYONE EQUALLY DOESN'T MEAN ATTACKING EVERYONE EQUALLY.



### Equal opportunities for all

No discrimination against race, nationality, gender, age, marital status, religion, sexual orientation, disability, or political beliefs.



## Commitment to quality

### What we do

- ✓ **Stick to Standard Work** to ensure quality and our customer's confidence in our products.
- ✓ **Take concerns seriously**, investigate quickly, and communicate clearly to resolve safety issues.

### What we don't do

- ✗ **Ignore quality standards** that protect our customers and ensure safety.



### Pause for thought

Take a moment to look at one of the examples on the 'what we don't do' pages 8 and 9. Consider what the person is doing incorrectly and why it may cause problems. Then compare it with the matching example on the 'what we do' pages 10 and 11 to understand the correct behaviour.



## Safety is our priority

### What we do

- ✓ **Ensure everyone's safety** through a secure, and healthy workplace, including the right PPE and training for your role.
- ✓ **Maintain a low risk environment** free of drugs, alcohol, and weapons.
- ✓ **Encourage proactive reporting** of anything that seems unsafe.
- ✓ **Empower** employees to spot opportunities for improving safety, quality, and environmental practices.

### What we don't do

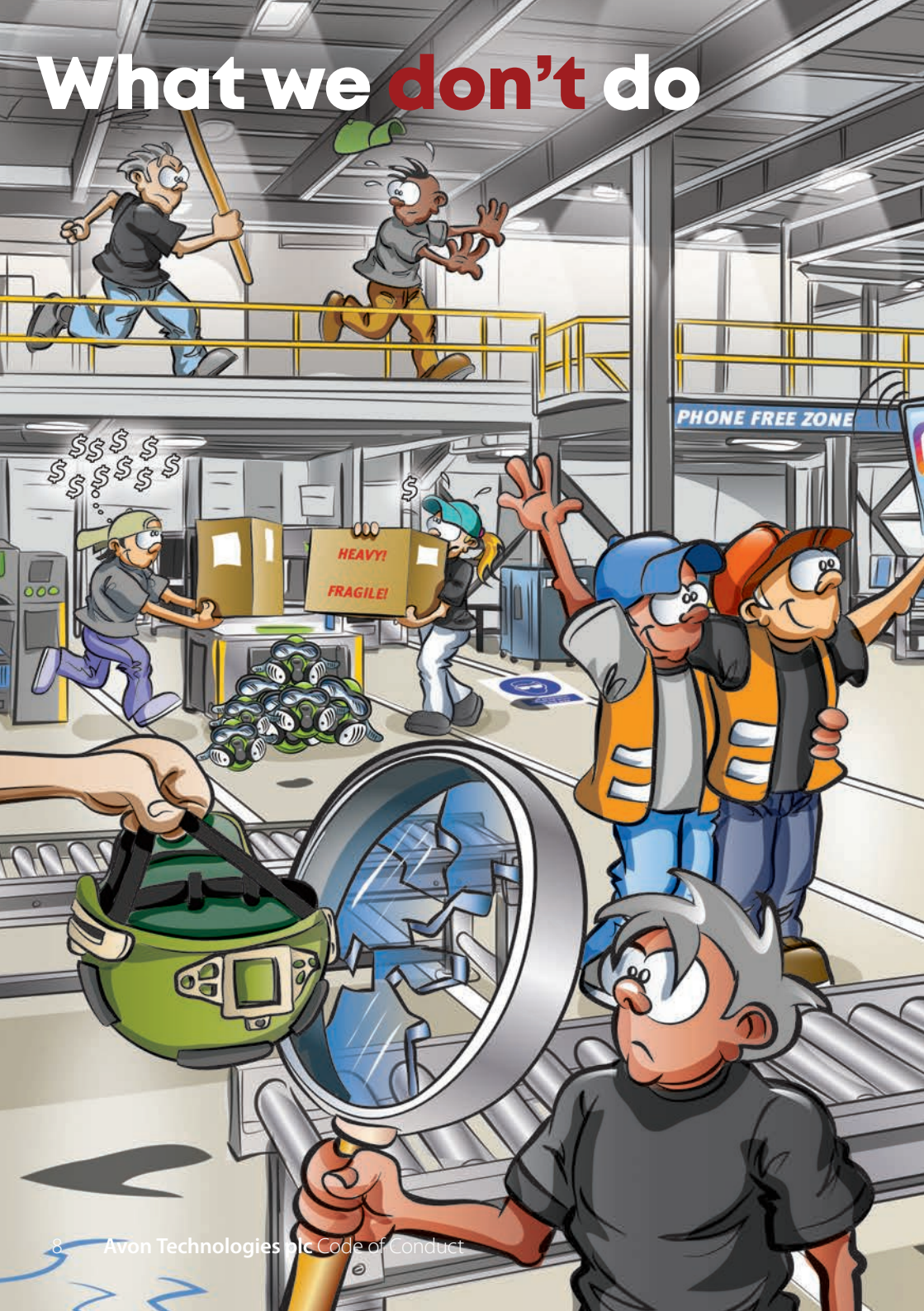
- ✗ **Ignore safety concerns** or discourage reporting of risks.

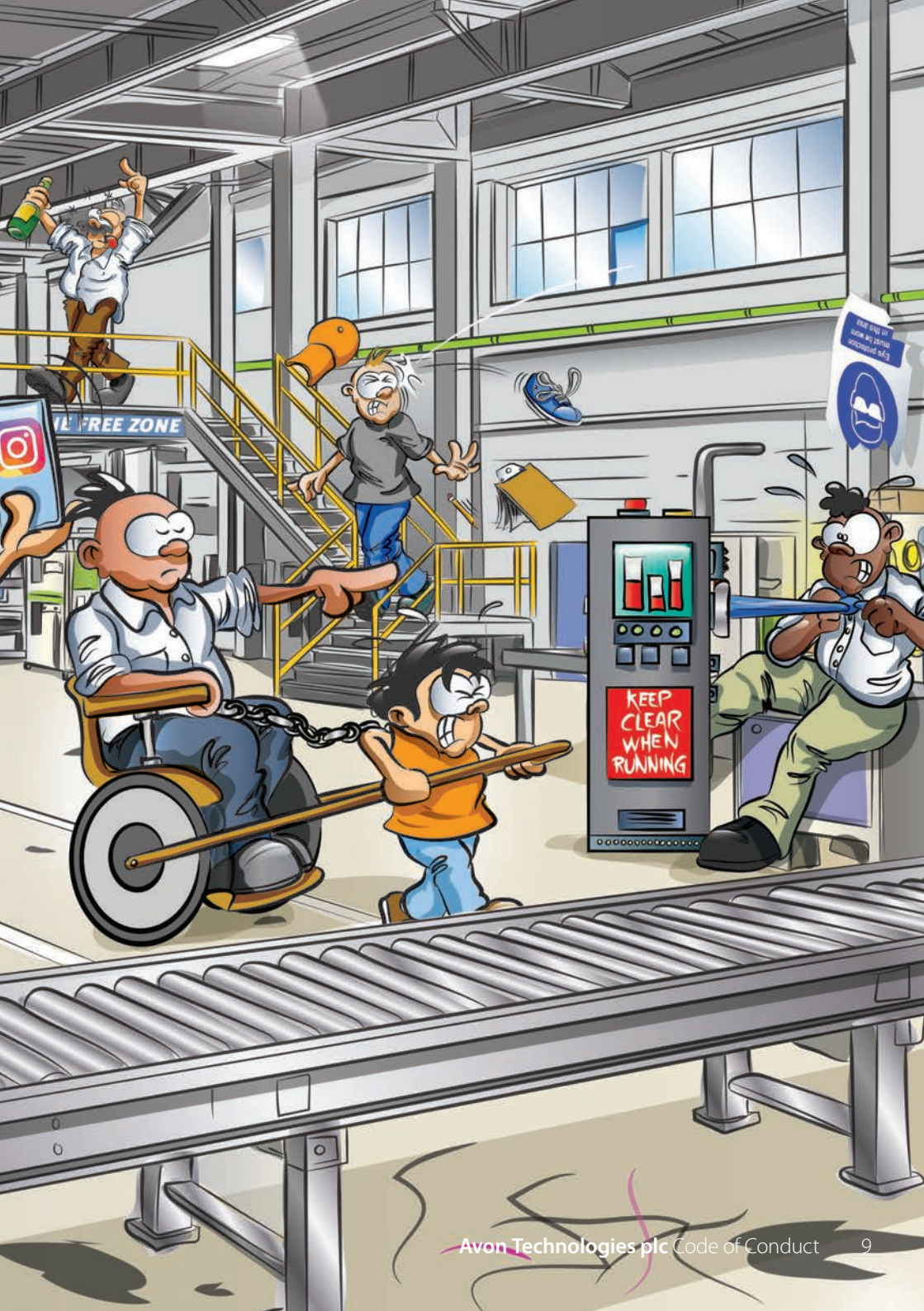


### Additional resources and training:

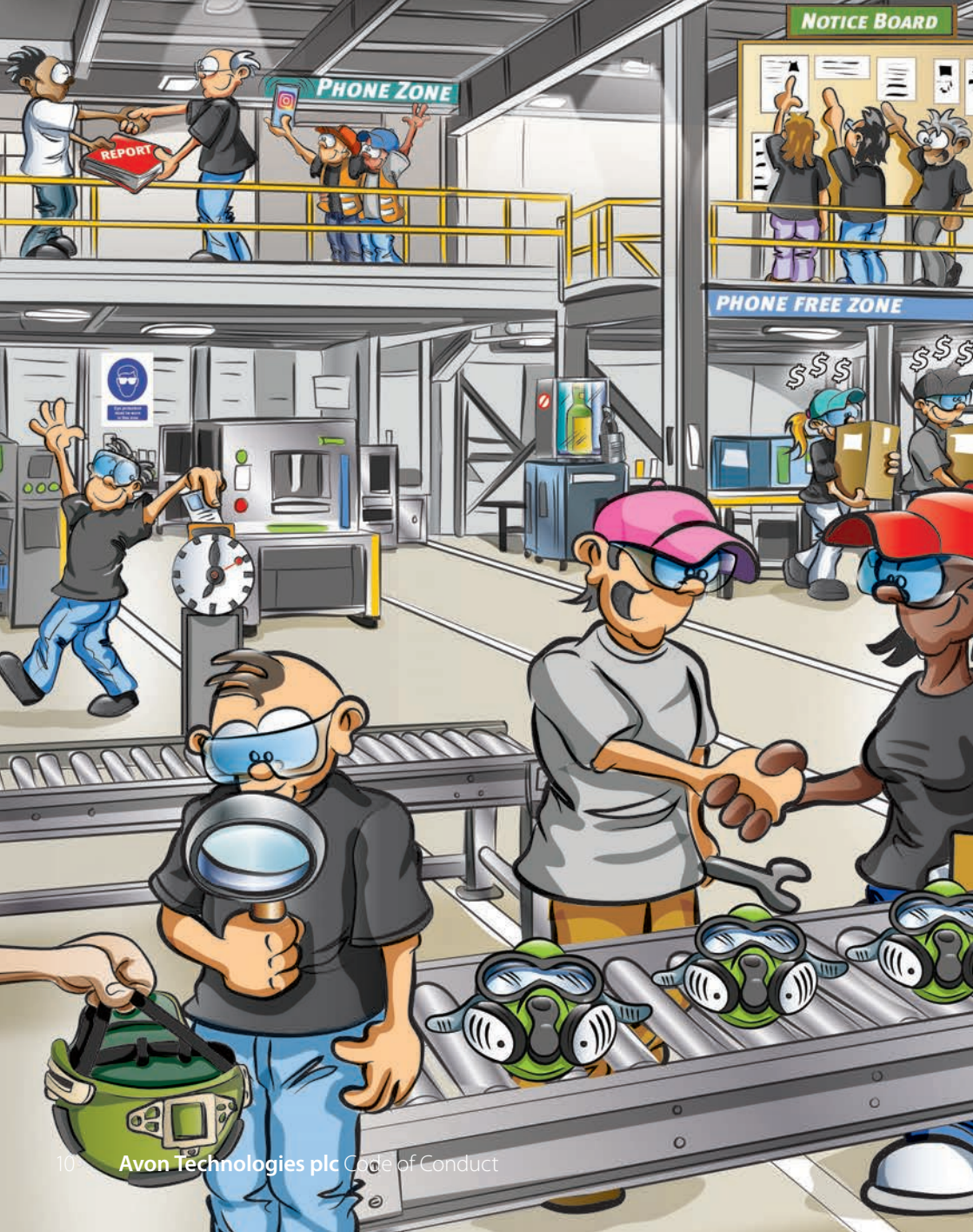
- ✓ FIERCE values and behaviours
- ✓ HR guidance and support
- ✓ Prevention against Modern Slavery
- ✓ Operating procedures
- ✓ Health and safety policies and training
- ✓ Onboarding materials
- ✓ Role-specific training

# What we don't do





# What we do





PHONE FREE ZONE

FEEDBACK

MANAGER

\$\$\$

I ❤️ FIERCE

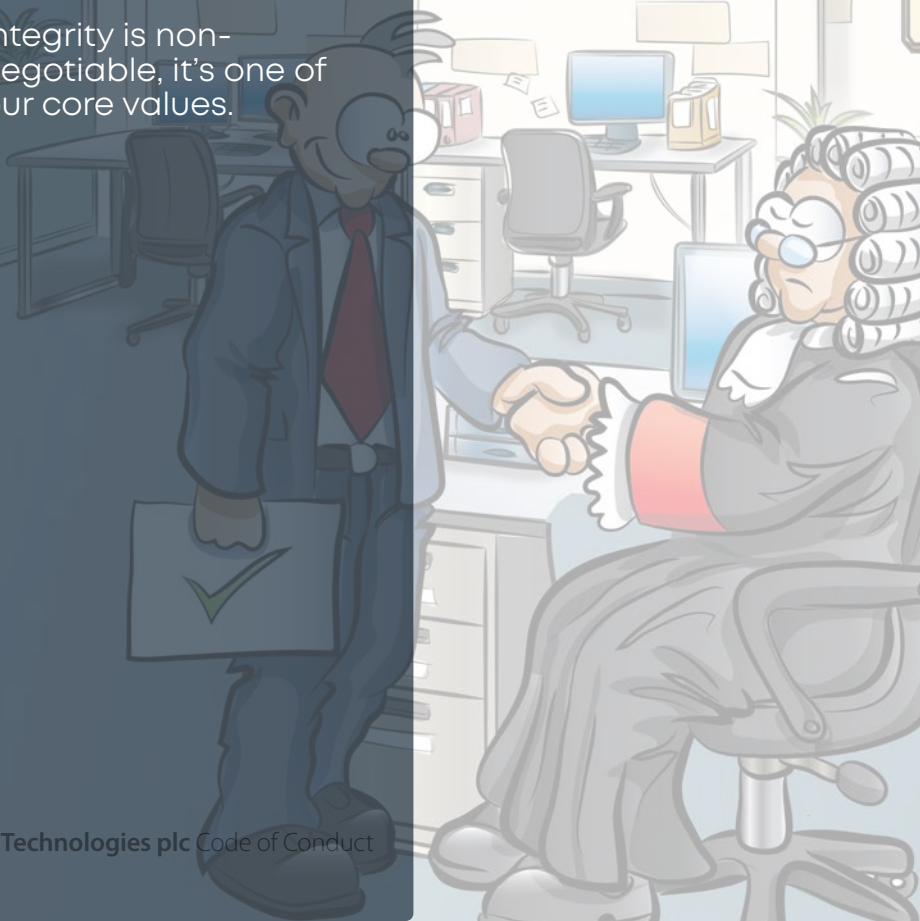
Eye protection must be worn in this area



## PILLAR 2

# Acting with integrity

Integrity is non-negotiable, it's one of our core values.





## Doing the right thing

### What we do

- ✓ **Comply fully** with all laws, with no exceptions.
- ✓ **Monitor and limit gifts** and hospitality so they remain appropriate, reasonable, and within clear limits in normal business.
- ✓ **Avoid conflicts of interest** to maintain trust and integrity.
- ✓ **Require approval** from senior management for any external work such as part-time roles, consultancy fees, directorships, or freelance projects, as these are generally not permitted.

### What we don't do

- ✗ **Allow any type of bribery** by or to anyone working with us (employees, agents, suppliers, or partners).
- ✗ **Influence anyone's decision** by offering gifts, hospitality or rewards.



### What could be a considered a conflict of interest?

Interviewing someone you have a personal relationship with for a new role, taking external work or consultancy without approval, or owning more than 1% of a competitor or supplier can all be seen as a conflict of interest.



## Financial integrity

### What we do

- ✓ **Keep financial reports** and records complete and accurate at all times.
- ✓ **Prevent tax evasion** and avoid helping anyone else evade taxes.
- ✓ **Follow delegated authority** levels for financial decisions, contracts, and expenses.
- ✓ **Ensure expenses are controlled**, reasonable, and deliver fair value for the company.

### What we don't do

- ✗ **Engage in insider trading** or trade Avon shares during restricted 'close period' as a person with inside information.



### What is Bribery?

Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual. If you're ever unsure contact HR or the legal team.

### When should I disclose gifts and hospitality, and what is the process?

- Gifts over £50/ \$80
- Hospitality over £150 / \$250 per person
- Anything above these limits must be approved by your manager and recorded in the gifts and hospitality register.



### Pause for thought

Although the following scenario is set in an office environment, financial and ethical integrity applies to every role. Take a moment to reflect on your own responsibilities and consider an example of where integrity plays a critical role in your work.

"SORRY, JOHN.  
CASINO LOSSES DON'T  
QUALIFY AS BUSINESS  
EXPENSES!"



#### Additional resources and training:

- ✓ Anti-bribery and Corruption policy and training
- ✓ Gifts and hospitality register
- ✓ UK and US travel expense policy and training
- ✓ Anti-facilitation of Tax Evasion policy and training
- ✓ We follow the guidance set out by the Financial Reporting Standards (IFRS) in the UK and comply with Generally Accepted Accounting Principles (GAAP).

# What we don't do

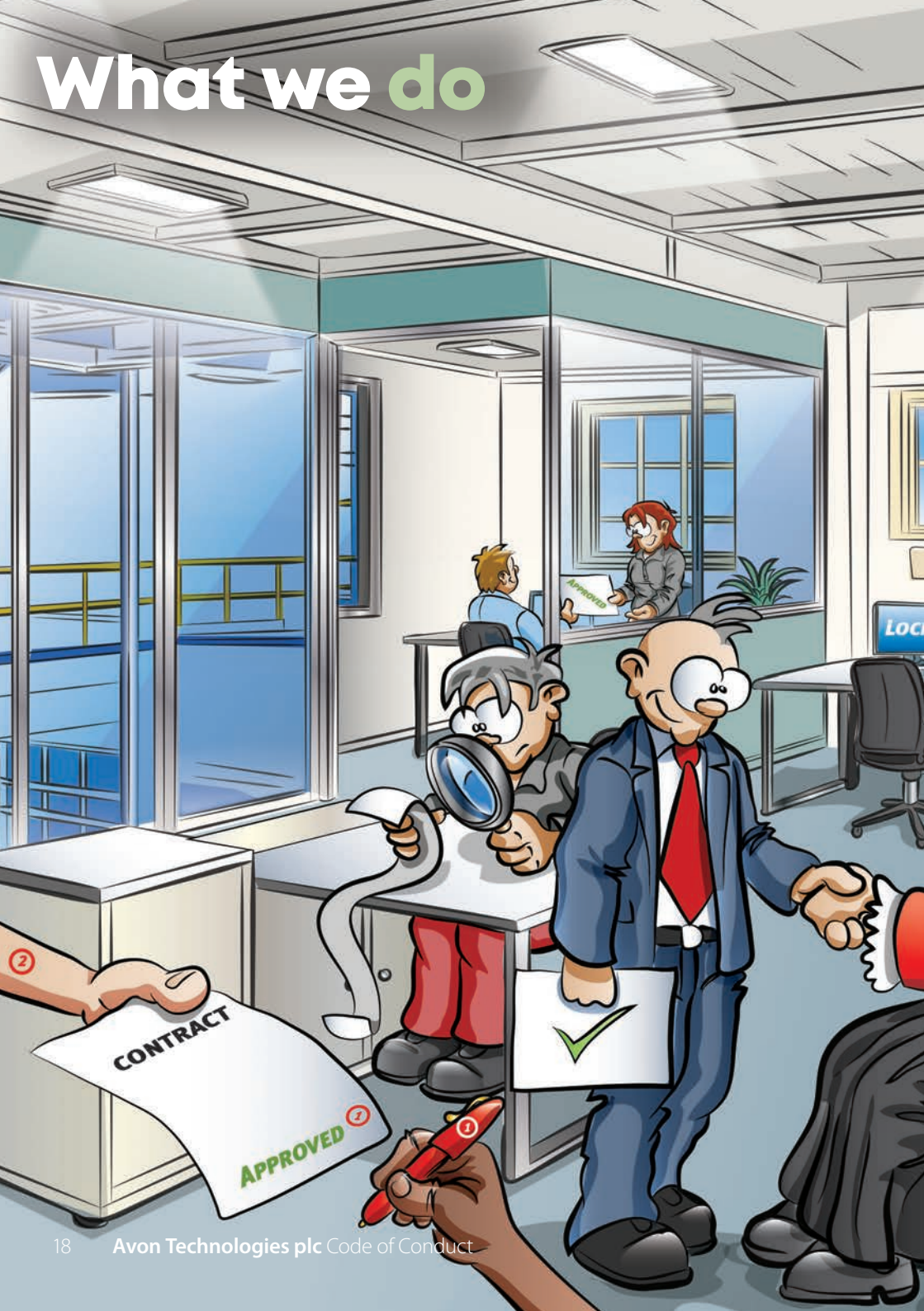




**WARNING!**  
FINANCIAL DATA  
OUT OF DATE

BACK IN 5...  
OR 10.

# What we do





**TAX  
CALENDAR**

**FINANCIAL  
REPORT**

Q1	200	30%	5000
Q2	400	40%	10000
Q3	700	55%	15000
Q4	1000	70%	20000



## PILLAR 3

# Protecting information, assets and technology

Safeguarding everything that keeps our business strong and successful.





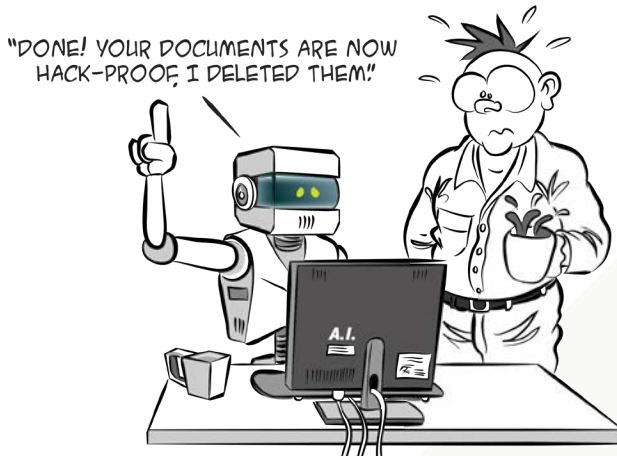
## Security and data protection

### What we do

- ✓ **Keep facilities secure** by allowing access only to authorised individuals.
- ✓ **Protect sensitive and confidential information** including company, customer, and partner data.
- ✓ **Handle controlled government data** (including CUI) responsibly.
- ✓ **Restrict access** to classified information to properly vetted and government-approved individuals.
- ✓ **Comply with data protection laws** and collect personal data only for legitimate business purposes.
- ✓ **Use generative Artificial Intelligence responsibly** and with appropriate care.

### What we don't do

- ✗ **Disregard policies and procedures** by handling classified or controlled information without proper clearance or outside the supervision of the Facility Security Officer (FSO) or security controller.
- ✗ **Post** any company, customer or partner information publicly.



### What is CUI?

It stands for Controlled Unclassified Information (CUI). It is a US Government owned or controlled information that requires safeguarding. CUI can also be created by contractors, like Avon Protection and Team Wendy when directed by the government.



## Assets and technology

### What we do

- ✓ **Create and safeguard** innovations including our ideas and inventions.
- ✓ **Maintain strong controls** to keep computer systems and data accurate, reliable, and secure.
- ✓ **Carefully and responsibly** use company assets and technology for the purpose they have been provided.

### What we don't do

- ✗ **Violate intellectual property rights** belonging to others.
- ✗ **Misuse company property** such as technology, vehicles, or buildings for personal gain or in ways that put our assets at risk.





### Confidential information might include:

- Trade secrets, manufacturing processes, intellectual property, and business or financial details.
- Information marked as confidential by us.
- Details about customers, suppliers, agents, distributors, and technical or financial data.
- Business plans, methods, research projects, marketing strategies, pricing, and sales information.
- Third parties' information which we are obligated to protect.
- Personal information about employees and their relationship with the company.



### Pause for thought

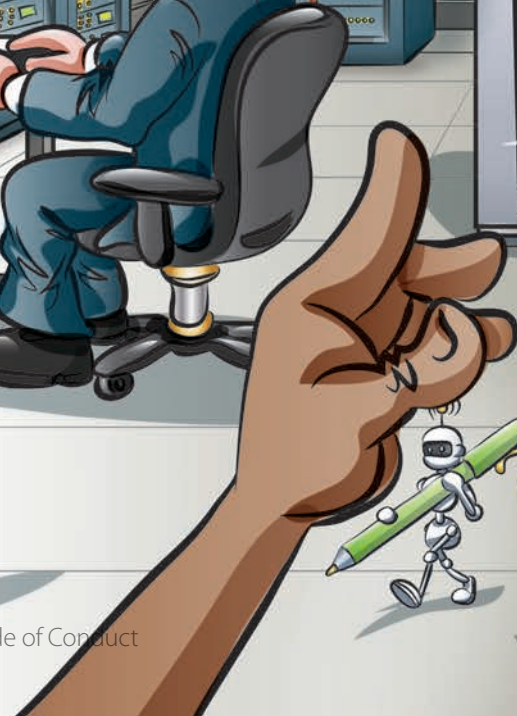
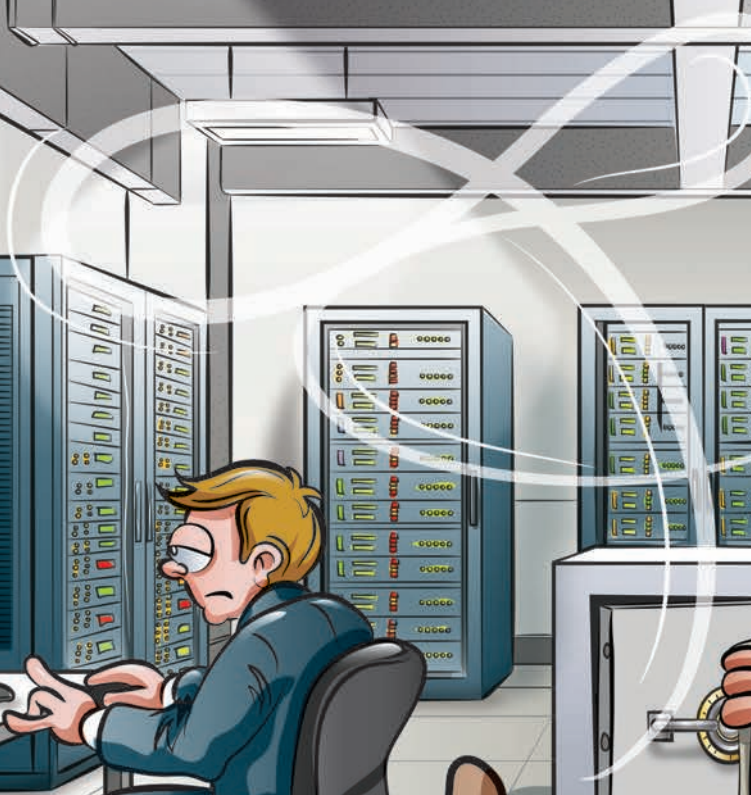
Many everyday actions help protect information, assets, and technology, often without us even realising it. As you look through the scenario on the next pages, take a moment to think about a simple action you take in your day-to-day work that helps keep information, assets, or technology secure.



### Additional resources and training:

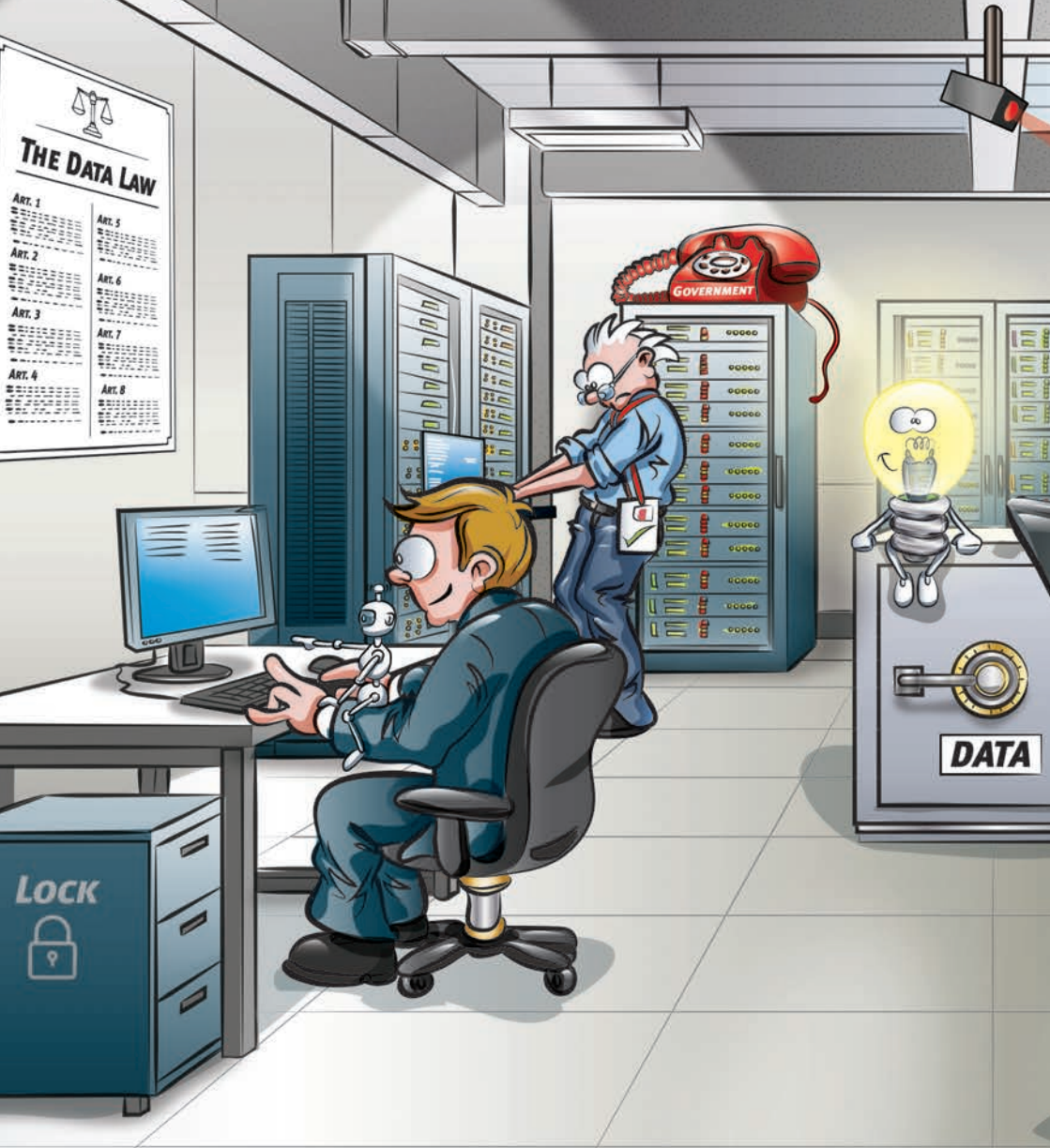
- ✓ Data Protection Policy
- ✓ Information Security Policies
- ✓ Communications process, policy and guidance
- ✓ Acceptable Use Policy
- ✓ AI guidelines
- ✓ Annual cybersecurity training

# What we **don't** do





# What we do







## **PILLAR 4**

# **Responsible business and global impact**

How we operate, choose partners, and contribute to the world.





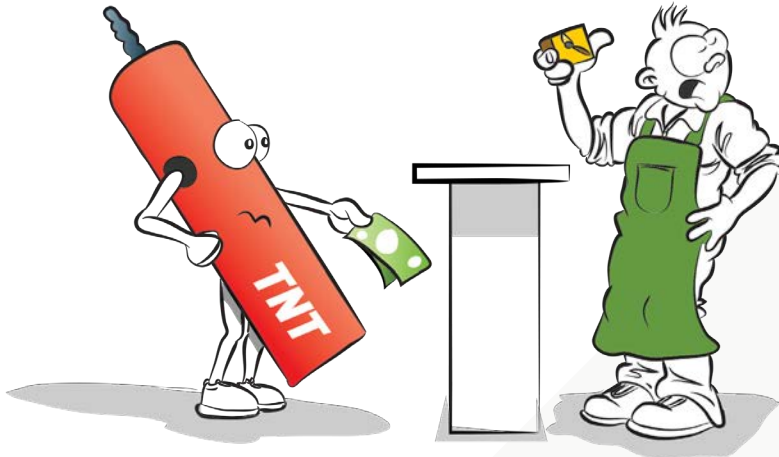
## Integrity with every interaction

### What we do

- ✓ **Only work with partners** who comply with the law and uphold standards aligned with our Code of Conduct.
- ✓ **Carefully check** third parties before we engage, paying extra attention to higher-risk regions or situations.
- ✓ **Monitor relationships** closely so we can act quickly if standards change or aren't met.
- ✓ **Ensure every business deal** is backed by a written agreement to address financial, tax, and legal risks.

### What we don't do

- ✗ **Allow slavery**, human trafficking, or child or forced labour anywhere in our operations or supply chain.



"EDNA! ANY RESTRICTIONS ON SELLING MATCHES?"



## Conduct business within the law

### What we do

- ✓ **Follow all laws**, regulations, and ethical standards, including rules for government contracts and procurement.
- ✓ **Comply with** trade control laws, ensuring we provide customs with accurate information – this includes the transfer of goods, technology, services, and data.
- ✓ **Limit competitor interactions** and never share sensitive information or engage in price-fixing or any anti-competitive behaviour.

### What we don't do

- ✗ **Submit false payment or expense claims** or misrepresent records in government contracts.
- ✗ **Trade with** sanctioned countries or individuals.



### Rules and regulations we comply with:

- ✓ UK Modern Slavery Act
- ✓ UN Declaration on Human Rights
- ✓ US Federal Acquisition Regulation (FARs)
- ✓ US Defense Supplement (DFARs)
- ✓ UK Ministry of Defence (MOD) Acquisition Operating Frameworks such as the Defence Conditions (DEFCON).
- ✓ UK Export Control Act 2002
- ✓ US The International Traffic in Arms Regulations (ITAR)
- ✓ US Export Administration Regulations (EAR)
- ✓ Trade sanctions set by recognized authorities, such as the EU and the US
- ✓ UK Bribery Act
- ✓ US Foreign Corrupt Practices Act.



## Positive social and environmental impact

### What we do

- ✓ **Support local projects** that matter to our business and community, focusing on initiatives that make a real impact.
- ✓ **Document all donations** and make sure they comply with anti-bribery principles.
- ✓ **Operate responsibly** to reduce environmental impact, always looking for ways to minimise resource use.

### What we don't do

- ✗ **Make political contributions** without proper disclosure in line with the laws and regulations of the country concerned.



### Pause for thought

What we do, and how we do it, can have far-reaching consequences. Think about the kinds of issues you often hear about in the news and the different stakeholders who could be affected, employees, customers, suppliers, communities, and even the environment. As you look at the image on the next page, think about what could go wrong and who might be affected if we don't take action to prevent those issues.

### Additional resources and training:

- ✓ Supplier Code of Conduct
- ✓ Export Control Programme and employee training
- ✓ Community Guidelines
- ✓ We use Transparency International's Corruption Perceptions Index to identify partners with low country scores to manage risk

# What we don't do





# What we do





COMPETITOR

CONTRACT

NEW SUPPLIER

RIGHT PATH

CUSTOMS



# Summary

## Our commitment

At Avon Technologies, we make products that save lives, and every one of us plays a critical role. This Code of Conduct is not just a document; it's our promise to do the right thing, every time.

No shortcuts. No excuses.

Whether you're on the production line, in sales, or leading a team, your actions and decisions matter. Living by this Code means acting with integrity, protecting each other, and safeguarding the trust that drives our success.

It's simple by design: clear, practical, and easy to follow. When in doubt, speak up, ask questions, and check against our policies and guidelines on Atlas. Together, we keep each other safe, earn trust, and deliver on our mission to those who rely on us.





### Use good judgement

Our Code cannot address every situation we may face, every legal requirement in every place we work, or any additional requirements that our customers may expect.

Where it may differ from local law or practice, you should always follow the higher standard. This Code is not a substitute for applying common sense and good judgement.

#### **Before you make any decision, please ask yourself:**

1. Does it reflect our values?
2. Would I feel comfortable explaining my decision to others?
3. Does it comply with the law and our Code of Conduct, policies and procedures?

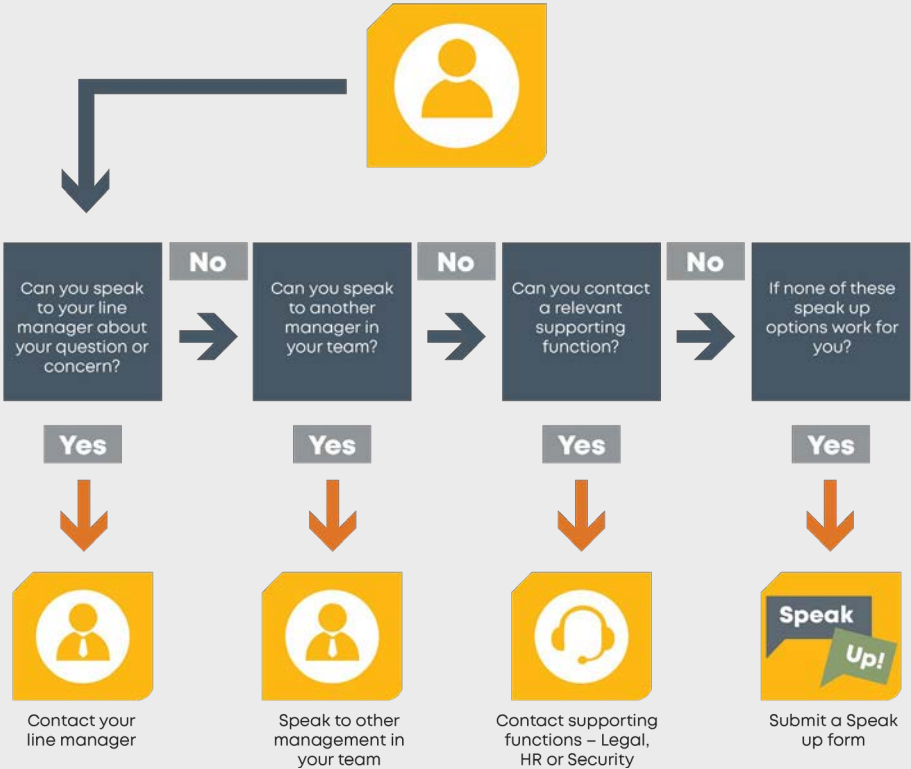
If the answer to any of these is no – please reach out and get advice from those around you, your manager, HR or the Legal team.



Doing the right thing and speaking up can be hard sometimes. It is important to report any concern you have, even if you are not 100% sure there is a violation. This is so the matter can be investigated and, if any wrongdoing is found, can be stopped immediately. If you have a concern that someone is not following our values or our Code, your first point of contact should be your manager, or someone from a supporting function such as your HR department or another internal resource such as our Legal department. But if you feel that channel isn't appropriate, you should ask a question or voice your concerns through our confidential "Speak Up" online platform.

**Speak Up is an entirely independent, anonymous and confidential reporting channel.** Your concern is submitted directly to members of the Executive Committee and will be investigated.

# Should I raise a Speak Up?



You can access Speak Up by visiting [www.avon-technologiesplc.com/speakup](http://www.avon-technologiesplc.com/speakup) or by using the paper forms on site.



## Next steps

Make sure you have read and understood the Code, and watch the accompanying video for additional insights from our CEO and Chair.

If you need more details on any topic covered in the Code, explore the resources listed below for further guidance.

### Policies

Throughout this Code, we reference policies and procedures designed to support you and provide additional guidance. These resources can be accessed via Atlas by selecting Policies and Conduct at the top of the page, then choosing Policies and Documents. If you do not have access to Atlas, please contact a member of the HR team for assistance.

#### Employee handbook

Your employee handbook and onboarding materials, provide detailed guidance on the policies and behaviours that shape our culture at Avon. These resources offer deeper insights into expectations and best practices to help you succeed.

Scan the QR code to access the employee handbook and onboarding documents. If you would like a hard copy please reach out to HR who can assist.





## Training

It is everyone's responsibility to ensure they have read and fully understood this Code.

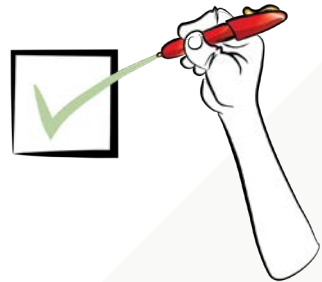
If you're a people manager, please take time to sit down with your team and discuss the topics and scenarios presented. This document, together with the Code Conversation Guide, is intended to promote open dialogue and foster a culture of integrity and doing the right thing.

## Our approach to government contracting

We do business with the United States Government and other governments around the world, including the United Kingdom. Because of this, we are required to follow special rules that promote honesty, fairness, and ethical behaviour. This Code is part of our commitment to meet the requirements of Federal Acquisition Regulation (FAR) Clause 52.203 13, Contractor Code of Business Ethics and Conduct, and similar requirements from other governments.

Our Code meets these regulatory requirements by requiring us to:

- ✓ Act honestly and ethically in all government work
- ✓ Follow the law and this Code
- ✓ Encourage employees to speak up about concerns
- ✓ Prevent and detect fraud, bribery, conflicts of interest, and false claims



**You must** follow this Code and report any concerns about possible misconduct or policy violations. Please note that some reporting may require disclosures to the government. Retaliation against anyone who raises a concern in good faith is strictly prohibited. By following this Code, you help protect our company, your colleagues, and the trust our customers and the public place in us.



# Key contacts

Names and addresses of individuals and departments who can provide advice regarding the Code.

The following individuals are based in the UK	The following individuals are based in the US
<b>CHIEF EXECUTIVE OFFICER</b> <b>Jos Sclater</b> Jos.Sclater@avon-technologiesplc.com	<b>GENERAL COUNSEL</b> <b>Jill McClune</b> Jill.McClune@avon-technologiesplc.com
<b>CHIEF FINANCIAL OFFICER</b> <b>Rich Cashin</b> Rich.Cashin@avon-technologiesplc.com	<b>GROUP HR DIRECTOR</b> <b>Kate Vizmeg</b> KVizmeg@teamwendy.com
<b>COMPANY SECRETARY AND GROUP COUNSEL</b> <b>Zoe Holland</b> Zoe.Holland@avon-technologiesplc.com	<b>Independent Board Director contact:</b>
<b>PRESIDENT, AVON PROTECTION</b> <b>Steve Elwell</b> Steve.Elwell@avon-protection.com	<b>NON-EXECUTIVE DIRECTOR</b> <b>Bindi Foyle</b> enquiries@avon-technologiesplc.com
<b>CHIEF INFORMATION SECURITY OFFICER</b> <b>Iain Craig</b> Iain.Craig@avon-technologiesplc.com	



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# Code of Conduct

AVON TECHNOLOGIES PLC