

Avon Metals



United Nations Global Compact

Communication on Progress Covering Calendar Year 2014

18th November 2015

To our Stakeholders:

Avon Metals has been a signatory to the United Nations Global Compact since 2007, and we continue to align our operations and strategies with its ten principles in the four key areas of Human Rights, Labour, Environment and Anti-corruption.

Signing the Global Compact affirms our long-standing commitment to strive to conduct business responsibly, and where possible, we actively encourage our business partners and other key stakeholders to join the initiative.

Our Communication on Progress (COP) is made available to stakeholders through the UN Global Compact website (www.unglobalcompact.org) and our own corporate internet site (www.avonmetals.com).

EXECUTIVE SUMMARY

Avon Metals is a metals recycling company whose main activity is the production of ~**15,000 metric tonnes per annum** of primary and secondary (scrap) based aluminium alloys in ingot form. These ingots are used by producers of aluminium products to ultimately make a wide range of everyday products. These include; beverage cans; pie case foil; car engines & wheels; aircraft engines and landing gear; building products - such as door and window frame extrusions and curtain walling.

The Company is also an important physical trader of various other primary, secondary (scrap) and specialty minor metals (including titanium and tungsten).

Following a major restructuring and an increase in international trade, the company has prospered into a dynamic, forward thinking business that has been recognised in local and national business awards, including a Queen's Award for Enterprise in Sustainable Development in 2009 for our 20/20 Vision CSR initiative, a Queen's Award for Enterprise in International Trade in 2012 and a Major Commendation in the 2010 prestigious Business Commitment to the Environment (BCE) Environmental Leadership Awards. In addition a number of other awards have been awarded in the period up to 2014, including Diamond Jubilee Business of the Year in the 2012 Gloucestershire Business Awards.

Avon Metals has demonstrated that a pragmatic approach to investing in our people, and protecting the environment through sustainable development, can be commercially viable.

We have temporarily put on hold implementing a GRI-4 Sustainability report due to funding restrictions.



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MISSION STATEMENT

To maximise shareholder value through the manufacture and timely supply of high quality, ethically produced, eco-friendly innovative metals and alloy products and services to our global customers, whilst inspiring a safe, dynamic and challenging environment that enriches the lives of our employees and the communities within our sphere of influence.

INTRODUCTION TO OUR SUSTAINABILITY PHILOSOPHY

Sustainability, or sustainable development, is often defined as acting in a manner that meets the needs of today without hindering future generations.

Since 2006, Avon Metals made a conscious decision to embark on a pioneering journey towards implementing, measuring and reporting sustainability.

Sustainability is more than just an initiative for Avon Metals - it is a philosophy that permeates right through the company influencing every single activity and decision. Avon Metals is committed to this philosophy and to continuous improvement on our road towards total sustainability. We seek to create a world class brand that will motivate customers, employees, suppliers and communities to partner with us for mutual long term benefit.

In its pursuits to achieve sustainability, Avon has cultivated new markets and forged new partnerships in a diverse array of market sectors ranging from aerospace and automotive, to alternative renewable energy sources and commercial applications for our process residues.

Progress is benchmarked against realistic internal and external business targets. Reliable measurement is essential to guarantee continued monitoring, careful evaluation, committed implementation and tangible results. These are the cornerstone principles behind Avon Metals SDI reporting and we are determined to grow in ways that ensure a sustainable future for generations to come.

Continuous improvement is our aim, and to this end we have adopted a Kaizen philosophy incorporating 5S and Lean manufacturing techniques. Input from stakeholders & shareholders alike will be actively sought and encouraged to ensure that we continue to implement best practices. We strive to exceed stakeholder expectations and improve the quality of life through our products and actions, and we will communicate transparently our vision, objectives and performance.

Steven Munnoch, Managing Director October 2015



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The Ten Principles

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights

- **Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and
- **Principle 2:** make sure that they are not complicit in human rights abuses.

Labour

- **Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- **Principle 4:** the elimination of all forms of forced and compulsory labour;
- **Principle 5:** the effective abolition of child labour; and
- **Principle 6:** the elimination of discrimination in respect of employment and occupation.

Environment

- **Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- **Principle 8:** undertake initiatives to promote greater environmental responsibility; and
- **Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- **Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.



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HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

AVON METALS LTD POLICY ON HUMAN RIGHTS

The objective of this policy is to minimise risks to Avon Metals from a breach of international Human Rights standards by the company or by association with business partners and suppliers. It aims to protect the business by providing a framework of fundamental principles of Human Rights by which Avon Metals Ltd will be guided in the conduct of its business.

Background

Human rights can be defined as basic rights that allow individuals the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. Avon Metals Ltd supports the principles of Human Rights set out in the Universal Declaration of Human Rights (UNDHR), International Labor Organization's Declaration on Fundamental Principles and Rights at Work and is a signatory of the United Nations Global Compact.

Scope

This Policy applies to all Avon Metals Ltd operations, including wholly or majority owned subsidiaries and associated companies where Avon Metals Ltd has management control. Particular attention is required by procurement functions when considering material tenders, third party contracts, business partners, suppliers and their supply chains where practical. It is not feasible to assess every supplier and the entirety of their supply chain.

While we do not have a direct influence over our business partners' operations, we look to engage with them and demonstrate our own internal standards. Where local legislation conflicts with this statement, we will comply with the law while seeking to promote best practice through our own conduct.

The role of companies and Human Rights has no single universal set of principles. We continue to monitor international developments and adhere with best practice such as the UNDHR and UN Global Compact whilst being mindful of national and cultural differences.



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Statement of principles

Avon Metals Ltd respects and supports the following:

- The right to equal opportunity and non-discriminatory treatment
- The right to security of person
- The rights of children
- The freedom of association and right to collective bargaining
- It will not use forced or compulsory labour
- It will provide a safe and healthy workplace
- It will pay workers a fair wage
- It will not pay bribes
- It will ensure that the company's services and products are not used to abuse human rights

Employees

Avon Metals Ltd employees are required to comply with our Business Principles, Brand Beliefs and code of conduct through our human resources policies and procedures.

Business partners and suppliers

Avon Metals Ltd will strive to ensure that procurement functions (dealing with material tenders, third party contracts and suppliers and functions dealing with business partners (commercial lines, joint ventures, etc) endeavour to seek partners upholding the same principles through their operations and supply chains where practical.

Customers

Avon Metals Ltd will seek to ensure that its products and services are not used to abuse human rights. Avon Metals Ltd will regularly appraise the social and economic climate of every country where we do business.

Signed

Steven Munnoch, Managing Director

March 2013



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Avon Metals works with suppliers who share our commitment to human rights.

Avon Metals Supplier Code of Conduct, required of all third party suppliers, encourages engagement with key human rights issues such as child labour, discrimination and working conditions throughout the Supply Chain.

In the past reporting period 2014, Avon Metals has not been subject to any investigations, legal cases, incidents or breaches of Avon's Code of Business Conduct, and in particular none related to human rights abuses.

OHSAS 18001 Standard & Investors In People Standards are in development

Avon has acknowledged the Securities and Exchange Commission final rule pursuant to section 1502 of the Dodd-Frank Wall Street Reform and Consumer protection Act relating to the use of conflict minerals, related to Tantalum and Tungsten in Avon's case. Avon has developed a Conflict Minerals Policy which was implemented companywide in 2013 and is available to the public on our website at the following address.

<http://www.avonmetals.com/conflict-minerals/4571125000>

The text of the policy is shown below.

AVON METALS LTD STATEMENT ON CONFLICT MINERALS

Summary of the Conflict Minerals Issue

The Democratic Republic of the Congo ("DRC") is a Central African country with vast mineral wealth, including reserves of cassiterite (source of Tin), columbite-tantalite (aka coltan – source of Tantalum), wolframite (source of Tungsten) and Gold. For many years, armed groups have fought to control mines within the DRC; those armed groups have been cited for committing violent crimes against locals, including murder, rape and forced labour. Armed groups controlling mines smuggle minerals out of the DRC and the proceeds are used to further finance conflict and perpetuate criminal behaviour; hence, cassiterite, coltan, wolframite and Gold are considered conflict minerals.



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The elements Tantalum, Tin, Tungsten and Gold are metals used in many manufactured goods across many industries, including the aerospace, appliances, automotive, electronics, jewellery, medical and tool & die industries. Significant proportions of Tantalum and gold is used in electronic and electrical products. Similarly, a significant proportion of the global Tin supply is used in electronic solders. A small portion of the world's Tungsten supply is used in electronic products as counter weights in cell phone vibrator bobs and in the manufacture of integrated circuits.

The Dodd-Frank Wall Street Reform and Consumer Protection Act, passed into law in July 2010, contains requirements that U.S. companies report to the Securities and Exchange Commission ("SEC") on the origin of conflict minerals or their derivatives and show due diligence if conflict minerals are sourced from the DRC or an adjoining country. The goal of the act is to cut direct and indirect funding of armed groups engaged in conflict and human rights abuses.

The SEC published regulations implementing Dodd-Frank Section 1502 on August 22, 2012 which will form the basis of Avon Metals Ltd policy on Conflict Free Minerals.

Avon Metals Ltd Approach on Conflict Minerals

Avon Metals Ltd acknowledges the Securities and Exchange Commission final rule pursuant to section 1502 of the Dodd-Frank Wall Street Reform and Consumer protection Act relating to the use of conflict minerals as summarised below.

Avon Metals Ltd is not involved in any way with the processing of "Conflict Minerals".

The Conflict Minerals Statutory Provision defines the term "Conflict Mineral" as cassiterite, columbite-tantalite, Gold, wolframite, or their derivatives, or any other minerals or their derivatives determined by the Secretary of State to be financing conflict in the Covered Countries.

This includes metals smelted from the above mentioned ores including Tantalum, Tungsten and Tin.

Avon Metals Ltd does not source any material from the following countries as defined by EICC/GeSI Conflict Free Smelter Program Supply Chain Transparency Smelter Audit Protocol for Tin, Tantalum and Tungsten rev 21 December 2012:-

Level 2 Countries

Level 2 countries are defined as they are known or plausible countries for the smuggling, export out of region or transit of Tin/Tantalum/Tungsten containing mineral.

- Kenya
- Mozambique
- South Africa



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Level 3 Countries

Level 3 countries are defined as the DRC and its nine adjoining countries, as outlined in section 1502 in the Dodd Frank Act.

- Angola
- Burundi
- Central African Republic
- Democratic Republic of the Congo (DRC)
- Republic of the Congo
- Rwanda
- South Sudan
- Tanzania
- Uganda
- Zambia

Secondary materials are considered conflict free, according to the final ruling of the Securities and Exchange Commission final rule pursuant to section 1502 of the Dodd-Frank Wall Street Reform and Consumer protection Act.

Furthermore, whilst secondary materials are currently exempt from the conflict mineral interpretation from all Country levels, Avon Metals Ltd only currently sources it's materials from Level 1 Countries defined as those countries with known active Tin/Tantalum/Tungsten ore production that are not identified as conflict regions or plausible areas of smuggling or export from these regions of Tin/Tantalum/Tungsten containing minerals as denoted above in Level 2 and Level 3 countries.

Scope of Supply for Avon Metals Ltd

Tantalum and Tantalum containing Materials

Avon Metals Ltd supplies Tantalum or Tantalum containing materials to our customers that will be sourced from:-

- a) Avon Metals Ltd approved suppliers of secondary Tantalum materials as defined in EICC/GeSI Conflict Free Smelter Program Supply Chain Transparency Smelter Audit Protocol for Tin, Tantalum and Tungsten rev 21 December 2012.
- b) Suppliers that have been accredited by EICC/GeSI through their Conflict Free Smelter program for the supply of Primary Tantalum materials.



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Tungsten and Tungsten containing Materials

Avon Metals Ltd supplies Tungsten or Tungsten containing materials to our customers that will be sourced from:-

- a) Avon Metals Ltd approved suppliers of secondary Tungsten materials as defined in EICC/GeSI Conflict Free Smelter Program Supply Chain Transparency Smelter Audit Protocol for Tin, Tantalum and Tungsten rev 21 December 2012.
- b) Suppliers that have been accredited by EICC/GeSI through their Conflict Free Smelter program for the supply of Primary Tungsten materials.

Tin

Does not currently deal with or process Tin

Gold

Does not currently deal with or process Gold.

Class 7 Transportation Statement

Tantalum and niobium minerals, namely columbite-tantalite and Tin Slags, often contain somewhat elevated levels of naturally occurring thorium and uranium, usually high enough for them to be classified as radioactive for handling and transport requiring adherence to international transportation regulations (class 7).

Avon Metals Ltd **does not** trade these minerals and therefore has no obligations to meet the requirements of these regulations for the products it trades.

Signed

Steven Munnoch, Director

March 2013

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LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

As covered by our Human Rights Policy, Avon Metals respects the freedom of its individual employees to join, or chose not to join, legally authorised, trade unions, associations or organisations.

As of the end of 2014, none of Avon's employees have taken the option to join legally authorised, trade unions, associations or organisations.

During the reporting period 2014 there were no strikes or lockouts at Avon Metals.

Principle 4: the elimination of all forms of forced and compulsory labour

As covered by our Human Rights Policy, Avon Metals states it will not use forced or compulsory labour.

All Avon Metals employees work for the company as a result of need or want. No one is forced to work for Avon Metals. Avon Metals is solely based in the United Kingdom and abides fully with UK and European Law and as such prohibit the use of any forced labour, including slavery, servitude or prison labour.

Avon Metals has implemented a Conflict Free Minerals policy, which aims to eliminate amongst other things, all forms of forced and compulsory labour in our supply chain.

Principle 5: the effective abolition of child labour

As covered by our Human Rights Policy, Avon Metals recognises the rights of children.

Avon Metals does not employ child labour. Avon Metals is solely based in the United Kingdom and abides fully with UK and European Law with respect legal age for employment.

Avon Metals has implemented a Conflict Free Minerals policy, which aims to eliminate amongst other things, all forms of child labour in our supply chain.

Principle 6: the elimination of discrimination in respect of employment and occupation.

As covered by our Human Rights Policy, Avon Metals states the right to equal opportunity and non-discriminatory treatment.

Avon Metals views as unacceptable any form of harassment, or unfair or unlawful discrimination based on race, age, gender, colour, sexual orientation, disability or national origin, whether by employees, temporary employees, managers, customers, vendors or Avon Metals' visitors.



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As of the 31st December 2014 of the 63 Avon Metals employees

- 92% Male : 8% Female
- 50% Minority Employees : 50% Non-Minority Employees
- 25% Employees aged below 30
- 53% Employees aged 30 to 50
- 22% Employees aged over 50

All employees are made aware of our zero tolerance stance towards discrimination of any kind.

An Employee Conduct Code Manual has been issued.

English Lessons are provided for speakers of other languages.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: undertake initiatives to promote greater environmental responsibility

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Avon Metals is a forward thinking, environmentally conscious company, and we have made a pledge to reduce our carbon footprint as far as practically and economically possible. It is Avon Metals Ltd.'s ultimate target to become "carbon neutral" as and when economically viable technology becomes available.

Being carbon neutral involves calculating the total climate-damaging carbon emissions, reducing them where possible, and then balancing the remaining emissions, often by purchasing a carbon offset e.g. paying to plant new trees or investing in "green" technologies such as solar and wind power.

Avon Metals core business is centred about the procurement and recycling of scrap metals predominantly Aluminium, but also a whole host of other metals. Many of these secondary materials are reprocessed into new alloys for onward use in a vast range of industries or refined or traded on to be incorporated into new alloys or parts.

This activity is significantly less energy intensive than the production of those metals via primary routes.

Together with this sustainable business plan Avon has also committed to minimise the impact on the environment as much as possible.



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Avon Metals is aiming to implement the Global Reporting Initiative (GRI) G4 guidelines to measure and report environmental impacts in a number of areas including raw material use, energy consumption, greenhouse gas generation, emissions, water use and discharge and waste generation and disposal.

Avon Metals have ISO 14001 environmental management system certification in place which is accredited by ABS Quality Evaluations, Inc. An independent accreditation body.

The Company is also an active member of the Climate Change Levy scheme operated by the DTI.

In 2014, work continued to lower processing temperatures and improve cycle time to minimise kW/hrs per tonne.

In the reporting period 2014 Avon Metals continued to make improvements in sound abatement to the local area. The movement of scrap metal around the plant can be very noisy. A number of initiatives have been implemented to minimise the escape of noise from the site. These have included the installation sound dissipation vents, acoustic dampening roller doors, trees around the site boundaries to absorb noise and we have restricted our scrap movement hours from 7:00 hrs - 22:00 hrs to 7:00 hrs - 19:00 hrs.

Avon Metals continues to source aluminium packaging waste, foils, cans, food containers etc for remelting into new alloys. This in the first instant, stops this material going for landfill disposal and secondly reduces the requirement for primary aluminium which is significantly more energy dense due to the energy required to smelt aluminium ore.

Avon Metals continues to support two local wildlife organisations, Slimbridge Wildfowl and Wetlands Trust and Gloucestershire Wildlife Trust.

Avon Metals Ltd is also developing a metal reclamation program for the recovery of metal from surgical implants that were previously sent to landfill. A proportion of the revenue realised from this program is donated to helping the aged.



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STATEMENT OF CONTINUED SUPPORT FOR THE UN GLOBAL COMPACT'S CEO WATER MANDATE

Water is essential for sustaining life. However, this valuable resource is distributed unevenly throughout the world and is also often used wastefully and polluted. This is resulting in severe ecological damage, disease, food shortages and violent conflicts. By developing and promoting solutions to support efficient and responsible consumption of water, Avon Metals is committed to conserving one of the most crucial of all raw materials.

A commitment to protecting water quality and reducing water consumption has long been part of Avon Metals company policy." Drinking water is a resource in scarce supply. A mere 2.5 percent of all the water on Earth is freshwater – and most of that is either contained in ice, or is present as groundwater and therefore difficult to access. According to estimates by the United Nations, water shortages will assume critical levels in numerous regions over the course of the next few decades. Today, over a billion people already have no access to clean water. As the world's population continues to grow and consumption habits change, the amount of drinking water needed, and the volume required for sanitary and hygienic purposes and especially for food production, will continue to increase. Increased urbanization is intensifying the pressure on local water resources and, particularly in the emerging countries, water pollution is on the increase. In some areas, climate change will exacerbate the situation still further due to decreased precipitation and rising sea levels.

Efficient water usage and water pollution control are key issues when it comes to sustainable development. Agriculture has a crucial role to play in this respect, as the majority of the water consumed in the world (around 70 percent) is used in the cultivation of foodstuffs.

As an active UNGC signatory, Avon Metals are also part of the CEO Water Mandate which focuses on achieving more sustainable consumption of this essential resource. By joining the CEO Water Mandate, Avon Metals commits to setting meaningful water reduction targets and tracking and reporting water usage, and has indicated its commitment to adhere to a comprehensive approach to water management. The Mandate is broken into six key areas: direct operations; supply chain and watershed management; collective action; public policy; community engagement; and transparency. Each key area concludes with a pledge for signers to commit to a number of related actions.

Steven Munnoch, Managing Director



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Future Plans

Avon Metals continues to assess projects that have the potential to reduce our environmental impact.

A planned power correction upgrade for the electric induction furnaces has been rescheduled for reassessment in 2016. The cost is over £100k and in the current economic climate this is difficult to justify, however it has the potential to save in excess of 1000 tonnes per annum of CO² emissions alone so will remain on the carbon footprint reduction list.

Work will in 2015/2016 to assess how we can utilise the plant site infrastructure to reduce our Carbon Footprint. Rain water capture and recycling and flue heat recovery system have been identified as possible initiatives to save or recover valuable resources. In addition we will also assess areas in which solar energy maybe utilised to supply electricity to business support buildings.

Avon Metals will be assessing the GRI G4 reporting model to monitor and report its performance with a plan to review resource this in 2016 subject to sufficient funding.

Avon Metals will continue to support and fund Slimbridge Wildfowl and Wetlands Trust and Gloucestershire Wildlife Trust.



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Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

In an effort to combat global corruption, the World Economic Forum Partnering Against Corruption Initiative (PACI) was formally launched by CEOs from the Engineering & Construction, Energy and Metals and Mining industries in January 2004. PACI is business driven global initiative with commitment from the top.

The PACI is the only global business-driven, anti-corruption initiative; it commits corporate leaders to action. It brings together companies in multiple industries from all over the world, regardless of their membership in the World Economic Forum or the size of their company. By signing the PACI Principles, signatory companies like Avon Metals commit to having a zero tolerance policy towards bribery and to developing and implementing or maintaining a broad-based, anti-corruption programme to guide the behaviour of their employees.

The PACI's mission is to develop multi-industry principles and practices that will result in a competitive level playing field, based on integrity, fairness and ethical conduct. The PACI Principles for Countering Bribery, create a common language on corruption and bribery valid for all industries firmly believing that corruption cannot be countered without leadership and commitment from the top.

These principles also apply to key business relationships with controlled subsidiaries, joint ventures, agents and other intermediaries, as well as contractors and suppliers. Effectiveness is ensured by a self-assessment process, which allows for companies to receive expert feedback on their anti-corruption programmes.

The PACI places the private sector in a unique position to guide governments' and international organizations' strategies and policies on anti-corruption and has built strong relationships with the key players and institutions from the global anti-corruption landscape.

The text of Avon Metals Ltd Business Ethics and Anti-Corruption Policy policy is shown below.



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AVON METALS LTD **BUSINESS ETHICS & ANTI CORRUPTION POLICY**

POLICY STATEMENT

It is the policy of Avon Metals Ltd to conduct business in an honest and ethical manner. A zero-tolerance approach is applied to bribery and corruption at every level in the business. This policy provides guidance in accordance with the Bribery Act 2010 but if you are concerned about any business dealing, irrespective of the ACT, you should report this immediately to your Manager or a Director.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Company, its subsidiaries or their employees (collectively referred to as **workers** in this policy, whether located in the UK or overseas. It also applies to third parties. In this policy, **third party** means any individual or organisation you come into contact with during the course of your work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

The Company will monitor the effectiveness of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. It does not form part of your contractual terms.

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This may include offering a potential client tickets to a major sporting event but only if they agree to do business with the Company. Bribes may not be obvious. For instance, if a supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in the business for their benefit, this would be unlawful. It would also be an offence to arrange to pay an additional amount a foreign official to speed up an administrative process, such as clearing our goods through customs.

The aim of this policy is not however to prohibit normal and appropriate hospitality being given to or received from third parties. Gifts or hospitality must not however be given or received with the intention of influencing a third party to provide a business or personal advantage. You should ensure:

- The gift or hospitality offered or received complies with local law;
- Is given in the name of the Company, not in your name;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate. For example, in the UK it is customary for small gifts to be given at Christmas;
- Considering the reason for the gift, it is appropriate in terms of type, value and timing;
- It is given openly, not secretly; and is not offered to or accepted from government officials or representatives, or politicians or political parties, without the prior approval of a Director.

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It is not acceptable for you (or someone on your behalf):

- To give, promise to give, or offer, payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward an advantage already given;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by the Company in return;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy. The policy is communicated to all new workers as part of their induction process and is communicated, with relevant training, to existing workers. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company.

You must notify your Manager or a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage, or indicates to you that a gift or payment is required to secure their business.

The Company is required to keep financial records which will evidence the business reason for making payments to third parties. You must therefore declare and keep a written record of all hospitality or gifts accepted or offered, and ensure that all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with the expenses policy and specifically record the reason for the expenditure.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

RED FLAGS

In the industry sector in which the Company operates, the following circumstances are considered to be the areas where risks are most likely and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- You receive an invoice from a third party that appears to be non-standard or customised;
- You are offered an unusually generous gift or offered lavish hospitality by a third party;

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RAISING CONCERNS

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage or if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future,. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your Manager or a Director.

The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If you believe you have received any such treatment, you should raise the issue initially with your Manager and if it is not remedied, and you are an employee, you should raise it formally through the grievance procedure.

Steven Munnoch, Managing Director

A handwritten signature in black ink, appearing to read "Steven Munnoch", written over a horizontal line.

Avon Metals



AWARDS & ACCREDITATIONS

2013

- Finalist : Business of the Year, Gloucestershire Business Awards
- Acquired AS9100:2009 Rev C

2012

- Winner: The Queen's Awards for Enterprise: International Trade
- Winner : Exporter of the Year, Insider Magazine Business of the Year
- Winner : Business of the Year, Gloucestershire Business Awards

2011

- Winner: Supplier of the Year, Cast Metals Federation Awards
- Winner: Nature Works Education Award, Gloucestershire Wildlife Trust
- Finalist : Business of the Year, Gloucestershire Business Awards
- Winner: Steven Munnoch Young Business Person of the Year, Gloucestershire Media Business Awards

2010

- Finalist : Best SME in "The Manufacturer Awards" – winner announced October 2008
- Finalist : Best Company in the Gloucestershire Business Awards
- Finalist : ITV / Price Waterhouse Coopers West of England Business Awards
- Winner: Major Commendation from Business Commitment to the Environment (BCE)

2009

- Winner: The Queen's Awards for Enterprise: Sustainable Development
- Finalist : ITV / Price Waterhouse Coopers West of England Business Awards
- Finalist : Business of the Year, Gloucestershire Business Awards
- Finalist : Corporate Social Responsibility, Gloucestershire Business Awards
- Finalist : SME Manufacturer of the Year, The Manufacturer Awards
- Finalist : Sustainable Manufacturing, The Manufacturer Awards
- Finalist : Business Growth Award, EEF Future Manufacturing Awards
- Finalist : Environmental Achievement Award, EEF Future Manufacturing Awards



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2008

- Finalist : Best SME in “The Manufacturer Awards” – winner announced October 2008
- Finalist : Best Company in the Gloucestershire Business Awards
- Finalist : ITV / Price Waterhouse Coopers West of England Business Awards

2007

- Winner : The Queen’s Award for Enterprise: International Trade.
- Winner : International Trade Award in the Gloucestershire Business Awards
- Winner : Steven Munnoch, Young Business Person of the Year in the Gloucester Business Awards
- Winner : Cast Metals Federation Supplier of the Year
- Winner : Gloucestershire Ambassador’s Book Check Cup for outstanding contribution to the region
- ISO 14001 Environmental Management System
- Beacon South West Status

Steven Munnoch, Managing Director