



# **AVON METALS SUSTAINABILITY REPORT 2008**

**OUR 20 / 20 VISION**



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*“Real success is looking honestly at what you can do, and then setting out to do more”*

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### GRI APPLICATION LEVEL



This Sustainability Report was prepared with reference to the Global Reporting Initiative 2002 Guidelines.

The table below shows our Self Declared & GRI checked Application Level “A”.

|           | 2002<br>In Accordance | C | C+ | B | B+ | A                                   | A+                        |
|-----------|-----------------------|---|----|---|----|-------------------------------------|---------------------------|
| Mandatory | Self Declared         |   |    |   |    | GA<br>GRI REPORT<br>2002 GUIDELINES |                           |
| Optional  | Third Party Checked   |   |    |   |    |                                     | Report Externally Assured |
|           | GRI Checked           |   |    |   |    | GA<br>GRI REPORT<br>2002 GUIDELINES | Report Externally Assured |

*“Sustainable Development may be defined as the ability to meet the needs of the present without compromising the ability of future generations to meet their own needs”*



## KEY FACTS & FIGURES



### KEY FACTS & FIGURES

In 2006, Avon Metals introduced a phased continuous improvement strategy to become a totally sustainable company. Entitled "Our 20/20 Vision", the company developed 20 Sustainable Development Indicators (SDIs) focusing on four key principles – Environmental, Social, Economic & Leadership / Management.

The 20 SDI's we have implemented are in some instances quantitative, in others qualitative, covering a range of criteria including process efficiency, reduction in defects, emissions, biodiversity, waste management and recycling. In all cases they focus on deliverability and cumulatively they are the primary basis underpinning our constant drive and commitment to enhance our performance.

The table on this page is a summary of our outstanding advances in each section, and this Sustainability Report gives the reader a detailed insight into the positive steps we have made in the past few years, and also our predicted targets for the future.

We have proven that working towards a healthier planet can also show a healthier balance sheet, and this has never been as important as in the current economic climate we face. We believe that Sustainability will be obligatory and it will only be companies such as ourselves who demonstrate good Corporate Social Responsibility and Sustainability values that will survive and prosper. Our closed loop systems have allowed us to reduce costs, increase revenues, innovate, differentiate and enhance our brand. As a direct result, we have enjoyed further competitive advantages and associated economic benefits from improved recruitment opportunities, greater retention of key staff and the ability to partner with key blue-chip companies.

We seek to engage stakeholders with similar values to our own and we feel proud to know that we are doing our part to help make the planet a better place for future generations.

| ENVIRONMENTAL DIMENSION  | SDI    | 2006   | 2007  | 2008  | 2009 TARGET |
|--|--------|--|-------|-------|-------------|
| Reduction of Carbon Dioxide (mg/m <sup>3</sup> )   | SDI 1  | 31   | 15.8  | 2.38  | < 2         |
| Reduction of Nitrogen Oxide (NO <sub>x</sub> )   | SDI 1  | 31   | < 5   | 2.28  | < 2         |
| Reduction of Sulphur Oxide (mg/m <sup>3</sup> )  | SDI 1  | N/A  | 4.1   | 2.9   | 2.5         |
| Energy consumption Mwh/t of finished product   | SDI 2  | 1.61   | 1.59  | 1.53  | < 1.5       |
| Transport cost per tonne delivered product £/t   | SDI 3  | 25   | 27    | 32    | < 30        |
| ISO 14001 Environmental Management System  | SDI 4  | No   | Yes   | Yes   | Yes         |
| Implementation of REACH regulation   | SDI 5  | N/A  | N/A   | Yes   | Yes         |
| Noise Reduction  | SDI 6  | See page 7 for our noise reduction initiatives |       |       |             |
| Amount of raw material input that is recycled material                                     | SDI 7  | 70%  | 75%   | 74%   | 75%         |
| Amount of packaging waste recycled (Tonnes)  | SDI 8  | 905  | 666   | 743   | 800         |
| Amount of dross recycled (tonnes)  | SDI 9  | 942  | 1030  | 1172  | 1200        |
| Corporate Partner of Gloucestershire Wildlife Trust & Slimbridge Wildfowl & Wetlands Trust | SDI 10 | No   | No    | Yes   | Yes         |
| Freshwater consumption M <sup>3</sup> /t of finished product                               | SDI 11 | 0.39   | 0.48  | 0.46  | 0.40        |
| SOCIAL DIMENSION   | SDI    | 2006   | 2007  | 2008  | 2009 TARGET |
| OHSAS 18001 Standard commenced   | SDI 12 | No   | No    | Yes   | Yes         |
| Number of fatalities   | SDI 12 | 0  | 0     | 0     | 0           |
| Investors In People process started  | SDI 13 | No   | No    | Yes   | Yes         |
| Staff Turnover   | SDI 13 | 12%  | 7%    | 4%    | < 4%        |
| Employee costs and benefits £ '000s  | SDI 13 | 1469   | 1517  | 1700  | 1800        |
| Gloucestershire Ambassadors  | SDI 14 | Yes  | Yes   | Yes   | Yes         |
| Beacon South West member   | SDI 14 | No   | Yes   | Yes   | Yes         |
| AluPRO member  | SDI 14 | Yes  | Yes   | Yes   | Yes         |
| Sponsorship of local sports teams  | SDI 14 | No   | Yes   | Yes   | Yes         |
| Global Compact Signatory   | SDI 15 | No   | Yes   | Yes   | Yes         |
| Partnership Against Corruption Signatory   | SDI 16 | No   | No    | Yes   | Yes         |
| ECONOMIC DIMENSION   | SDI    | 2006   | 2007  | 2008  | 2009 TARGET |
| Defects (products that require re-working)   | SDI 17 | 1.80%  | 1.60% | 0.80% | 0.50%       |
| ISO 9001 Quality Management System   | SDI 17 | Yes  | Yes   | Yes   | Yes         |
| Financial contribution to the local economy £ '000s  | SDI 18 | 1890   | 2987  | 2761  | 3000        |
| Research & Development   | SDI 19 | See page 23 for savings made through R & D.    |       |       |             |
| Global Reporting Initiative Signatory  | SDI 20 | No   | No    | Yes   | Yes         |
| MANAGEMENT & LEADERSHIP DIMENSION  | SDI    | 2006   | 2007  | 2008  | 2009 TARGET |
| Awards & Accreditations Received   | M & L  | 1  | 7     | 2     | 3           |

£ 7<sup>2</sup>  
%  
2  
€  
\$ 4<sup>1</sup>



## AVON METALS : OUR 20/20 VISION



### MISSION STATEMENT

***“Our mission is to be recognised as the best metal recycling company in the world. We strive to provide consistently attractive returns to our shareholders through best available techniques, sustainable development and good corporate citizenship.”***

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### EXECUTIVE SUMMARY

Avon Metals is a metals recycling company whose main activity is the production of 10,000 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 increase in international trade, the company has prospered into a dynamic, forward thinking business that has been recognised in local and national 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.



### INTRODUCTION TO OUR SUSTAINABILITY PHILOSOPHY

In 2006, Avon Metals made a conscious decision to embark on a pioneering journey towards implementing and measuring sustainability. Sustainability, or sustainable development, is often defined as acting in a manner that meets the needs of today without hindering future generations.

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.

To achieve this, Avon has developed an all-encompassing, innovative Management and Leadership System entitled "Our 20/20 Vision". This initiative is based around 20 voluntary, quantitative Sustainable Development Indicators (SDI), covering the company's key performance in all three pillars of sustainable development - social well-being, economic prosperity and environmental stewardship - to be systematically measured and transparently reported to our stakeholders.

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. 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

August 2008



***“Every journey starts with a single step”***





## ENVIRONMENTAL DIMENSION



*“Do your  
share to  
ensure  
cleaner  
air”*

### SUSTAINABLE DEVELOPMENT INDICATOR (SDI) 1

#### REDUCTION OF GREENHOUSE GASES

Avon Metals has invested over £500k in plant and equipment to protect the environment. A state-of-the-art fume arrestment plant has made significant reductions to carbon emissions.

It is our aim to become Carbon Neutral by 2010 and the company is working with the Carbon Neutral Company to achieve this. Whenever Company representatives travel overseas, we select to offset our carbon emissions when booking flights.

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

The table to the right details our Gas Emission Levels.

Through investment in new, more energy efficient plant and equipment we have reduced our CO<sub>2</sub> emissions by an estimated 93% our Carbon Monoxide emissions by 39% in the reporting period 2006-2008.

Nitrogen Oxide emissions were down 93% and Sulphur Oxide by 29% over the reporting period.

Our other Air Emission levels are well below the statutory levels imposed under our Permit to Operate.

| Gas Emission   | Direct Greenhouse Gas / Indirect Greenhouse Gas / Other Air Emission | 2006 Emissions (mg/m3)  | 2007 Emissions (mg/m3) | 2008 Emissions (mg/m3) |
|--|--|---|------------------------|------------------------|
| Carbon Dioxide (CO <sub>2</sub> )  | Direct   | 31  | 15.8                   | 2.38                   |
| Methane<br>Hydrofluorocarbons (HFCs)<br>Petrofluorocarbons (PFCs)<br>Sulphur Hexafluoride (SF <sub>6</sub> ) | Direct   | Avon Metals is not a significant generator of these Direct Greenhouse Gases           |                        |                        |
| Nitrogen Oxide (NO <sub>x</sub> )  | Direct   | 31  | <5                     | 2.28                   |
| Sulphur Dioxide (SO <sub>x</sub> )   | Direct   | Data collection started in 2007   | 4.1                    | 2.9                    |
| Carbon Monoxide (CO)   | Indirect   | Data collection started in 2007   | 3.9                    | 2.38                   |
| Non-methane volatile organic compounds (NMVOCs)  | Indirect   | Avon Metals is not a significant generator of these Indirect Greenhouse Gases         |                        |                        |
| Cadmium and its compounds  | Other  | Data collection started in 2007   | 0.007                  | 0.015                  |
| Lead and its compounds – permissible max. limit = 1 mg/m <sup>3</sup>  | Other  | 0.10  | 0.018                  | 0.010                  |
| Chloride (as HCl) – permissible max. limit = 5 mg/m <sup>3</sup>   | Other  | 2.19  | 1.08                   | 1.38                   |
| Fluoride (as HF) – permissible max. limit = 5 mg/m <sup>3</sup>  | Other  | 0.23  | 0.14                   | 0.430                  |
| Total particulate matter – permissible max. limit 20 mg/m <sup>3</sup>                                       | Other  | 9.47  | 2.62                   | 3.605                  |
| Chlorofluorocarbons (CFCs)   | Other  | Avon Metals is not a significant generator of these other ozone depleting substances. |                        |                        |

THE  
**CARBON  
NEUTRAL**  
COMPANY



## ENVIRONMENTAL DIMENSION



***“Those who  
have real  
power are the  
ones who  
conserve it”***



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### SDI 2

#### REDUCTION IN ELECTRICAL ENERGY

The commissioning of a new gas fired reverberatory furnace that uses organic material, such as paint and plastic backing, as a catalyst to fuel the melting process, has helped reduce our total energy consumption by 0.08 Mwh per tonne of finished product - a 5% overall decrease within the application period.

Every year Avon Metals trades a large amount of Silicon metal into the photovoltaics industry for the production of silicon wafers for solar panels - a renewable energy source, and one which we intend to fully exploit.

Future plans also include looking at the possibility of harnessing the heat generated by our furnace chimney stack via a turbine system to power the heating system in our office block.

| ENERGY CONSUMPTION        | 2006  | 2007  | 2008  |
|---------------------------|-------|-------|-------|
| Total Mwh                 | 15436 | 14990 | 16622 |
| Mwh/t of finished product | 1.61  | 1.59  | 1.53  |

### SDI 3

#### TRANSPORT MANAGEMENT

Avon delivers finished ingots to UK customers and operates a skip collection service for industrial generators of aluminium scrap.

Our Transport Management Strategy is based upon balancing the need to travel with the need to improve quality of life

These movements have always required the use of three vehicles – a curtain-side lorry and two skip wagons.

By investing in a new truck with an innovative, versatile loading system that can incorporate both finished product and loose scrap, we have been able to consolidate our transport from 3 vehicles into 1.

Not only does this reduce our internal transport costs per tonne, it also makes for more effective route planning by maximising payloads and therefore reduces our Carbon Footprint through conserved fuel and lower emissions.



Unfortunately, the recent hike in fuel prices has meant that this positive initiative on our behalf has been somewhat negated.

| TRANSPORT COSTS                      | 2006 | 2007 | 2008 |
|--------------------------------------|------|------|------|
| Cost per tonne delivered product £/t | 25   | 27   | 32   |



***“Our Transport  
Management  
Strategy is  
based upon  
balancing the  
need to travel  
with the need to  
improve quality  
of life”***





## ENVIRONMENTAL DIMENSION



**“We are  
REACH  
ready –  
are  
you?”**

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### SDI 4

#### ENVIRONMENTAL MANAGEMENT SYSTEM

The Company is accredited to the Environmental Management System (EMS) ISO 14001. The following is controlled under this Standard: -

- ✓ Monitoring emissions to the atmosphere from chimney stacks.
- ✓ Monitoring noise levels – to neighbouring businesses, residential areas and also to our workforce.
- ✓ Recycling of aluminium packaging waste.
- ✓ Waste minimisation and appropriate disposal for recycling/reprocessing and reprocessing of waste by products such as dross, wood, building materials, toner cartridges, mobile phones, paper, cardboard & plastics.
- ✓ Safe management and disposal of effluents.



### SDI 5

#### IMPLEMENTATION OF REACH REGULATION

We support REACH, the pan-European legislation for the Registration, Evaluation and Authorisation of Chemicals. The aim of REACH is to protect people's health and the environment through a risk assessment of chemicals produced in the European Community. We see REACH not as a threat but as a business opportunity and we intend to pre-register all eligible substances we handle by the end of 2008.

We are a Gold Member of ReachReady – a wholly owned subsidiary of the Chemicals Industries Association



### SDI 6

#### NOISE REDUCTION

During the period of application, Avon installed louvred windows at high level in the foundry to cut down on noise emissions from plant and equipment. Noisy oxygen enrichment equipment was de-commissioned and replaced with quieter burner systems. The height of our boundary tree screening was also increased to further dampen noise pollution and to promote the nesting of birds and other important wildlife.



**“Ignorance  
falls on  
deaf ears”**



## ENVIRONMENTAL DIMENSION



**“Recycling aluminium scrap saves 95% of the cost of mining and converting from ore – we believe Scrap is King”**

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### SDI 7

#### SOURCING OF SUSTAINABLE RAW MATERIALS

A large proportion of the aluminium alloys that Avon manufactures involve the use of high purity (99.5% min) aluminium. This has predominantly been achieved by re-melting virgin aluminium ingots produced from alumina (bauxite). Through extensive overseas travel, Avon identified new sources of scrap with similar chemistry to primary ingots, but with an associated cost advantage to us. One good example of this type of scrap is heat shields that are normally destined for car engines. Material has been successfully bought on long term contracts from South Africa, Spain and the Antipodes. In both 2006 and 2007, we replaced over 600 metric tonnes per annum of primary ingot with new production scrap, reducing the need to buy material mined directly from ore and saving 95% of the energy required to refine the ore into primary ingots. The associated cost saving to the business over these two years is estimated at £120k. Our overall recycling input materials rate increased from 70% to 74% in the period of reporting.



### SDI 8

#### REDUCTION IN THE AMOUNT OF PACKAGING WASTE GOING TO LANDFILL

Aluminium packaging waste is sourced on a local and national scale. Recent investment in plant and equipment through revenue gained from the sale of Packaging Recovery Notes (PRN) has enabled the Company to widen the range of aluminium scrap it handles and the amount of packaging waste it reprocesses. Two 1.5 tonne induction furnaces, which were commissioned at the start of 2006, have made it possible for Avon to take in, melt and recycle a more diverse range of raw materials, including foils. The company has also invested in a fume extraction plant for the melting of decorated and lacquered aluminium - toothpaste tubes, for example – which emit more smoke due to the organic content. In 2006 we received an award from the Compliance Scheme - Valpak - for Best Investment of PRN Revenue

In the period June 2006 to July 2008 we recycled 2314 tonnes of aluminium packaging waste into new useful products, that would otherwise have gone down the landfill or incineration routes.



Our corporate membership of Alupro (the non-profit Aluminium Packaging Recycling Organisation) encourages charity groups based in and around Gloucestershire to sort aluminium foil from waste streams and bring to Avon for remelting. These groups (such as the Fairtide Centre in Lydney, the Cheltenham Integrated Recycling Project and the Oakley Adult Opportunity Centre in Whaddon) provide meaningful voluntary work for severely disabled people who sort the foil. These schemes help disabled people build self-esteem and realise their true potential. As a result, the community is challenged to change their perceptions about disabled people. Income generated from the sale of the foil is reinvested into the project which has full involvement of Alupro and support from Vision 21 (Cheltenham) and Cheltenham Centre for Change.



**“Aluminium packaging can be recycled time and again with no loss in quality”**





## ENVIRONMENTAL DIMENSION



**“Our  
Recycling  
Strategy is  
simple –  
Reduce,  
Re-use,  
Recycle”**

### SDI 9

#### DEVELOPING A RECYCLING STRATEGY (INCLUDING SAFE DISPOSAL OR RE-USE OF WASTE PRODUCTS)

Avon Metals is ultimately an aluminium recycling company. Aluminium can, with just cause, be described as the “green” metal. Aluminium meets the complex ecological and technological requirements of our environmentally conscious society, and is a considerable ally in the fight against waste, energy consumption and environmental damage. The aluminium economy is a circular economy. For most aluminium products, the metal is not actually consumed during the product's lifetime, but simply used with the potential to be used again through recycling. Aluminium can be recycled again and again without any loss of its inherent properties, since its atomic structure is not altered during melting. Therefore, the life cycle of an aluminium product is not the traditional "cradle-to-grave" sequence, but rather a renewable "cradle-to-cradle". In all of its activities Avon Metals, and indeed the aluminium industry per se, aims towards a position of sustainability in environmental and social terms.

The high value of aluminium scrap is a key incentive and major economic impetus for recycling, independent of any legislative or political initiatives to encourage recycling. Aluminium scrap has considerable market value because most of the energy required for the production of primary aluminium is embodied in the metal itself and, consequently, in the scrap.

Therefore, the energy needed to melt aluminium scrap is only a fraction of that required for primary aluminium production. Recycling of aluminium products needs only 5% of the energy needed for primary aluminium production.

Avon Metals promotes other forms of recycling on site and has segregated collection points for the following office consumables: -

- ✓ Printer & toner cartridges
- ✓ Plastic vending cups / bottles
- ✓ Redundant mobile / office telephones
- ✓ Paper & Cardboard
- ✓ Aluminium & steel beverage cans
- ✓ Glass bottles
- ✓ Electrical & electronic equipment
- ✓ Newspaper & magazines



...and the following is recycling from the works: -

- ✓ Skimmings (dross)
- ✓ Filter dust
- ✓ Wooden pallets
- ✓ Plastic strapping
- ✓ Oils
- ✓ Bricks & rubble

The dross or skimmings that are created in our smelting process are sent away for refining at a specialist plant in Shropshire, where in excess of 40% of useful metal content is extracted and machined in re-meltable metallic balls and the leftover salt cake is sold into the refractory and brickwork industries to make useful building and ceramic based products, replacing conventional carbon intensive materials such as cement. During the period of application, Avon recycled 3144 tonnes of dross.

**“Recycle  
today,  
tomorrow  
depends on  
it”**



## ENVIRONMENTAL DIMENSION



WWT create and restore wetlands to help reverse the loss of these important areas throughout the world. In the UK, 2,000 hectares of wetland wildlife reserves provide winter refuge for more than 150,000 waterbirds.

The work Slimbridge carries out compliments Avon Metals' present and future business plan to become totally sustainable.

Conservation of UK wetlands helps sustainability in several ways: -

- ✓ Wetlands act as a natural "carbon sink" and help to offset our carbon emissions.
- ✓ Reed beds naturally detoxify sewage water before it enters local river systems.
- ✓ Wetlands help combat flooding – the risk being demonstrated by the 2007 Gloucestershire floods.
- ✓ Many other "ecosystem services" and anthropocentric benefits that are often not readily visible, including: - natural regulation of air quality, pollination and biological pest control.



***“Endangered species must be protected and saved so that future generations can experience their presence and value.”***

### SDI 10

#### PROTECTION OF LOCAL WILDLIFE & PROMOTION OF BIODIVERSITY

Gloucestershire Wildlife Trust is the county's leading conservation charity dedicated to wildlife. Environmental good practice is now taken very seriously by responsible companies.

Avon Metals is proud to be an active Corporate Sponsor of the Trust - we have extended our commitment to our environment, saving some of the last remaining habitats for wildlife in our County. Partnership is available to companies committed to reducing their environmental impact. We feel honoured to help play a direct part in looking after Gloucestershire's natural heritage.

Avon is also a Slimbridge Wildfowl and Wetlands Trust Corporate Partner. Founded in 1946 by the naturalist and artist, the late Sir Peter Scott, WWT is the only UK charity with a national network of nine specialist wetland visitor centres. With over 60 years experience of wetland conservation, WWT is active in the protection of wetlands and all that depend on them for survival.

Wetlands and their ecosystems cover a global area one third larger than the USA and one half larger than Brazil. Half of the world's wetlands have already been lost over the last century and this is increasing. WWT is committed to saving these essential ecosystems and their wildlife.



Slimbridge is home to an astounding array of wildlife including the world's largest collection of swans, geese, and ducks. Other important wildlife includes kingfishers, flamingoes, water voles, beavers, redshank, brown hares, dragonflies, wild otters, grass snakes and wild orchids. In 2008 Avon Metals funded a "dragonfly pond" project at Slimbridge to encourage dragonflies to the site. Additionally, this will promote other pond wildlife such as frogs, newts and toads.

We plan to follow up on our successful 2007/2008 schools competition by running an event in conjunction with WWT, Alupro and Gloucester City Council for all Gloucestershire schools to design and make a dragonfly sculpture (as an homage to the pond) out of recycled aluminium foil and drinks cans. Slimbridge have kindly agreed to exhibit the winning entries. This will tie in several important themes for us – recycling, carbon reduction, education, nature, art, & biodiversity.



**Saving wetlands  
for wildlife & people**



***“As humans we are designated as the stewards of the planet's wildlife.”***





## ENVIRONMENTAL DIMENSION



*“The noblest  
of the  
elements is  
water”*

*Pindar  
476 B.C.*

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### SDI 11

#### REDUCTION OF FRESHWATER CONSUMPTION PER TONNE OF ALUMINIUM PRODUCED & RAINWATER CAPTURE

As part of our "20/20 Vision" initiative, Avon Metals has made strides to reduce our water use. We have set ourselves a target to reduce our water use by 5% per annum.

Our policy includes: -

- ✓ Carrying out a survey to locate all areas of water use on site
- ✓ Identifying areas to reduce water waste.
- ✓ Installation of meters to regularly monitor water use
- ✓ Implementing a water saving campaign
- ✓ Staff training to ensure they are aware if what products can be washed down the drain.
- ✓ Checking the integrity of on site containers
- ✓ Avoiding leakages and spills
- ✓ Fitting of flow restrictors and automatic cut-off devices

| Water exiting Avon Metals' site                              | 2006<br>M <sup>3</sup> | 2007<br>M <sup>3</sup> | 2008<br>M <sup>3</sup> |
|--|------------------------|------------------------|------------------------|
| Water evaporated through molten metal cooling process        | 2631                   | 3181                   | 3527                   |
| Water passing through interceptors and into foul sewer       | 1127                   | 1363                   | 1512                   |
| Freshwater consumption M <sup>3</sup> /t of finished product | 0.39                   | 0.48                   | 0.46                   |

Avon Metals has purchased approved water saving devices on the Water Technology List (WTL), including flow restrictors and automatic shut-off devices.

Avon Metals is registered with the Envirowise Rippleffect - a 3 stage initiative involving data collection, development and implementation an action plan and measuring savings.

Data has been collected using the Global Water Tool developed by the World Business Council of Sustainable Development (WBCSD).

In the year July 2007 - June 2008 we reduced our water consumption by 0.02 cubic metres per tonne of finished product, representing a 4% decrease.

The roofs of our factory buildings make good collectors of rainwater.

Avon Metals intends to capture the runoff rainwater in storage tanks, filter particles through a mesh and then re-use this water to cool our ingots.



*"We forget that  
the water cycle  
and the life  
cycle are one."*

*Jacques  
Cousteau*

This initiative has been started and completion is aimed for 2010.

When considering the average rainfall figures published by the MetOffice, our runoff co-efficient and the size of our roof area, we anticipate capturing 250,000 litres per annum of renewable water.



## SOCIAL DIMENSION



**“Health & Safety is paramount in our thinking and decision making”**

PAGE 12

### SDI 12

#### HEALTH & SAFETY - REDUCTION IN WORKPLACE INJURIES

The Directors of Avon Metals recognise that Health & Safety is of paramount importance to us and is taken into account in every management decision we make and every process we carry out.

In 2008, Avon Metals co-ordinated with BSI Management Systems and started the process to attain the Occupational Health & Safety standard OHSAS 18001. This will be in place in 2009 and will integrate seamlessly with our existing ISO 9001 Quality and ISO 14001 Environmental Management Systems. An aluminium foundry and non-ferrous scrap yard can be a dangerous place with many potential hazards – heat, airborne dust contaminants, dust and fumes from molten metal, vibration, noise, manual handling and plant operation.

Our entire workforce – from senior management to shop floor – has a focus on fundamental safety systems and are made aware such hazards and of their responsibility within their own area. We promote good practice on a day-to-day basis and have a 3 stage HSE strategy, in line with the Health & Safety At Work Act 1974: -

- 1) Identification of hazards & potential risks
- 2) Take action to prevent & control risks
- 3) Keep control measures under regular review assessment.

Avon Metals is involved in several industry specific Health & Safety Initiatives including The Cast Metals Federation SHIFT (Safety & Health Foundry Targets Initiative), designed to share best practice through quarterly meetings at the National Metalforming Centre which generally focus on specific areas, such as Hand/Arm vibration, Manual Handling or Workplace Transport; and through the Aluminium Federations' AIMS (Aluminium Industry Made Safer) initiative, whose target is to achieve a 10% reduction in Lost Time Incident (LTI) rate over a 3 year period.

We pride ourselves on our “zero fatalities rate” throughout the history of the company - much lower than our industry norm. Our Lost Time Incident Rate was well below our industry average in 2005 and 2006 and slightly higher in 2007. Our “Target Zero” aim is to reduce this rate in 2008 and beyond.

The rate of RIDDOR reportable accidents amongst SHIFT group members has reduced from 4,214 / 100,000 employees in 2002 to 1,777 / 100,000 in 2007 - a 58% reduction.

The company conducts annual health screenings, including monitoring of hearing levels, lung function, bi-annual personal air monitoring and night workers assessment.

An independent H & S consultant visits on a monthly basis to carry out “completely independent” risk assessment surveys. A written report stating action required is produced.

| Avon Metals Health & Safety Statistics | 2005 | 2006  | 2007 | Aluminium Industry Average |
|--|------|-------|------|----------------------------|
| Lost Time Incident (LTI) Rate          | 4.8  | 5.6   | 6.5  | 5.6                        |
| Total Recordable Incident (TRI) Rate   | 15.5 | 10.31 | 20.8 | 12.1                       |
| Fatalities                             | 0    | 0     | 0    | 3                          |

Listed in this Sustainability Report are some of the daily Health & Safety issues we face and how we tackle them effectively: -

#### HEAT

The furnaces and molten metal in a foundry create a hot working environment. Dehydration, heat cramps, heat exhaustion and heat stroke are some of the health effects foundry workers can experience from exposure to excessive heat.

We combat this by using fans and flues to reduce the air temperature, giving regular work breaks in cool areas, job sharing and rotation, and using personal protective equipment such as eye wear, heat reflective clothing, gloves and footwear

Typical Primary Protective Equipment



**“We are proud of our zero fatality rate”**





## SOCIAL DIMENSION



### SDI 12 CONTINUED....

#### HEALTH & SAFETY - REDUCTION IN WORKPLACE INJURIES

##### DUST & FUMES

Foundry operations create dusty conditions exposing workers to various health risks. Foundry workers may be exposed to various types of dust, including nuisance dust, wood dust, metal dust and airborne RSC (Respirable Crystalline Silica) dust. Specific illnesses have been linked with exposure to certain types of dust. Fumes generated from melting of molten metal may irritate the lungs.

We deal with dust and fumes in various ways – extraction canopy hoods over the furnaces, DISA Airmaster state-of-the-art dust extraction plant, training in safe work practices and use and maintenance of personal protective equipment (PPE) and respiratory protective equipment (RPE), respirators with organic vapour filters for organic vapours. When relining furnaces, operatives use air fed RPE with an assigned protection factor (APF) of minimum 40 and we use a permit-to-work system for access. When cleaning up metal dust we use a type H vacuum cleaner fitted with a HEPA filter, instead of a brush. Dross is sent for reprocessing almost as quickly as it is generated, reducing the chance of it getting wet and emitting gases. We ensure that workers shower and change after every work session and use a contract laundry company to wash work clothing.

### MOLTEN METAL

Serious burns may result from splashes of molten metal and radiant heat at any time in the melting and pouring areas. Sparks from molten metal may also damage the eyes. Exposure to infrared and ultraviolet radiation may result in eye damage including cataracts. There are many practices which may increase the risk of hot metal splashes: charging a furnace with contaminated or moist scrap metal and alloys; using moist tools, moulds or other material when contacting molten metal.

Our control methods for molten metal include: - maintaining a safe working distance, ensuring that all raw material ladles and other equipment that may come in contact with molten metal must be completely dry, restricting unauthorised access to the furnace area by barriers and signage, restricting visitors and workers from wearing synthetic clothing, including undergarments when entering the furnace and pouring areas; keeping the melting and pouring areas free of combustible material and volatile liquids; provide training in safe work practices and the use and maintenance of personal protective equipment including full faceguards. Fire extinguishers of all types are close to hand throughout the facility.

### HAND ARM VIBRATION (HAV)

Although a very low risk, at times our foundry workers may be exposed to whole-body vibration and hand-arm vibration from hammering ingots and cleaning furnaces with pneumatic drills. The health effects of vibration can include blood pressure and heart problems, nervous disorders, and blanching and numbness in the fingers.

Our control measures for vibration include: using tools with vibration dampers, monitoring and limiting the use of vibrating equipment, providing protective gloves.

### NOISE

Avon employees are subjected to a variety of noise sources, such as induction furnaces, casting track hammers; fettling and scrap handling are capable of causing damage to hearing. Where high levels of noise are present, workers wear personal hearing protectors.

To control noise we have installed a new improved ingot mould design to aid ingot discharge and minimise the need for fettling on most of our casting tracks that has drastically reduced the amount of excess metal to be removed after casting. This in turn removes or reduces the need for fettling.



DISA Airmaster dust extraction plant

**“Shortcuts  
cut life  
short”**

**“Alert today.  
Alive  
tomorrow”**



## SOCIAL DIMENSION



**“Our  
success is  
no  
accident”**



### SDI 12 CONTINUED....

#### HEALTH & SAFETY - REDUCTION IN WORKPLACE INJURIES

##### PLANT & MACHINERY

Avon Metals uses a wide range of metal processing equipment including fork lift trucks, balers, shears, croppers, and furnaces. Burns, cuts and lacerations and amputations are some of the injuries that can result from poor maintenance, repair and guarding and use of such plant and machinery.

We deal with such risks by: - enclosing or guarding dangerous machines; neutralising potential energy sources during maintenance and repairs, full operator training and provision of personal protective equipment.

Visitors and workers with medical implants, joints, plates or similar objects are kept away from our induction furnaces as the magnetic fields involved in the melting process can induce a charge in the metallic implant. Personnel with cardiac pace makers are particularly at risk and are restricted from approaching the induction equipment.

##### COSHH

All laboratory substances (including acids) and paints for identifying finished product are controlled under COSHH (Control of Substances Hazardous to Health) regulations and are kept in secure, fire-proof cabinets

### MANUAL HANDLING

Workers in most areas within Avon are required to perform manual tasks including lifting, driving vehicles, tool use, dressing off, ingot stacking, which could lead to musculoskeletal or repetitive strain disorders.

We have reduced manual handling risks by redesigning equipment or work practices. A good example of this is ingot stacking. We have invested in spring loaded tables which maintain a constant, comfortable working height for the operative, thus avoiding the need to bend over all the time and strain the back. Wherever possible, lifting is mechanically assisted through the use of forklifts, grabs and hoists. .

### WORKPLACE TRANSPORT

Every year in UK industry people are killed or seriously injured in workplace transport related accidents. Commonly accidents involve people being hit or run over by vehicles such as forklift trucks, cars, lorries, vans etc.

At Avon Metals, we control the risk of this happening by ensuring that: - i) the design and layout of the workplace enables us to separate vehicles and pedestrians as much as possible; ii) loading and unloading operations are carried out in areas away from passing traffic and pedestrians; iii) our vehicles are fitted with horns, lights, reflectors, reversing lights; iv) suitable designated parking areas are provided for work related vehicles (both permanent and visiting); v) there are safe systems of work for activities such as coupling/uncoupling trailers, covering and uncovering vehicle loads and accessing the top of vehicles; vi) we provide traffic control features such as clearly marked pedestrian crossing points, mirrors at blind corners, and pedestrian barriers (especially at exits onto traffic routes) vii) provision of high visibility vests for staff and visitors – be seen, be safe.

### SLIP TRIPS

We promote good housekeeping to ensure that loose lumpy or granular metals are kept in proper storage and that any spills of metal or liquids are cleaned up quickly.

Skin creams are available to help prevent dermatitis.

### FIRST AID

Several Avon managers and foreman are fully trained First Aiders and first aid kits are readily available throughout our factory and office complexes.



Reception entrance pedestrian barrier

**“Safety  
is as  
easy as  
ABC –  
Always  
Be  
Careful”**





## SOCIAL DIMENSION



### SDI 13

#### STAFF TRAINING AND PERSONAL DEVELOPMENT

Avon Metals believes that our people are our most valuable asset and encourages a healthy work-life balance that ensures that the workplace is clean, safe and healthy at all times.. The company operates a no smoking policy. Our staff turnover is much lower than our local average at less than 5% per annum.

The Company provides staff with a generous remuneration and incentives programme including death in service benefit, generous annual leave per year, flexible retirement plans and help towards achieving work-related qualifications.

In 2007, two long serving employees suffered from long-term illness – we were delighted to help them meet their ongoing living costs.

The Company operates an employee development review process, which provides an opportunity for all team members to work with their line manager to plan their development for the coming year. This may include formal training, gaining experience in new areas, and/or mentoring. This allows us to identify and create relevant career pathways for our workforce. Wherever possible we endeavour to “promote from within”.

Our training courses for employees include: - Effective Leader Management; Forklift / heavy plant operation; Health & Safety; First Aid at Work; Business Improvement Techniques; Technical courses; REACH (Registration, Evaluation and Assessment of Chemicals)

Avon utilises the skills and assets of a multinational workforce. Avon Metals current language resources include Chinese Mandarin and Polish as a mother tongue and many European languages as a secondary asset. The Company organises regular scheduled ESOL (English for Speakers of Other Languages) for the foreign workers it employs.

Performance reviews are also conducted annually, creating the opportunity to identify specific objectives for each team member, to review progress against previous objectives. It is the policy of the Company that the training, career development and promotion of disabled persons should, as far possible, be identical with that of other employees.

Staff are encouraged to develop their skills, and these will be furthered and honed under our impending Investors In People (IIP) implementation.

Wage levels are above average for the industry, and financial incentives are in place for production levels, skill level & night shift work. We also plan to introduce Environmental and Health & Safety related bonuses in 2009.

|   |                           |
|---|---------------------------|
| Total Number of Avon Employees              | 64 Employees at July 2008 |
| Percentage of Full-Time Employees           | 97 %                      |
| Percentage of Part-Time Employees           | 3 %                       |
| Percentage of Permanent Staff               | 100 %                     |
| Percentage of Temporary Staff               | NIL                       |
| Percentage of Staff Employed in Gloucester  | 100 %                     |
| Percentage of Male Employees                | 93 %                      |
| Percentage of Female Employees              | 7 %                       |
| Percentage of Minority Employees            | 32 %                      |
| Percentage of Non-Minority Employees        | 68 %                      |
| Percentage of Employees aged below 30       | 29 %                      |
| Percentage of Employees aged 30 to 50       | 35 %                      |
| Percentage of Employees aged over 50        | 36 %                      |
| Average Male Base Salary Per Annum          | £20,700                   |
| Average Female Base Salary Per Annum        | £17,000                   |
| Ratio of Male to Female Average Base Salary | 1.22 : 1                  |



**“We  
endeavour  
to promote  
from  
within”**



**“We  
believe  
that our  
people  
are our  
biggest  
asset”**

## SOCIAL DIMENSION



Avon is a member of the Gloucestershire Ambassadors Programme organized by Gloucestershire First. The main purpose of the Ambassadors Programme is to support the development and economic wellbeing of the county by; confirming commitment and action from Gloucestershire 'key influencers'; creating door-opening opportunities and influence wherever possible; supporting partnership initiatives to create a sustainable economic environment and promoting Gloucestershire on every possible occasion. In November 2007, Avon Metals won the Book Check Cup for outstanding work in the region at the Gloucestershire Ambassadors Millennium Dinner and Gloucestershire First were involved in the judging of our tree competition for Gloucestershire schools.

Avon is a new member of Beacon South West. Coordinated by the South West Regional Development Agency, The status is awarded to companies who have the potential to add value to the economy of the south west, and are willing to share their knowledge and experience with others.

In 2008, Avon hosted a Beacon Boardroom event at our premises. The MD of a local dental drill manufacturer used the forum to air the problems he was experiencing in the of his metallic dental sludge.



***“When it comes to anything social, be it business or the community, winning is a team sport”***

### SDI 14

#### IMPROVEMENT & DEVELOPMENT OF COMMUNITY RELATIONS

In 2007, Avon Metals, in conjunction with Alupro and Gloucestershire County Council, co-ordinated a competition for Gloucestershire schools. Over 40 participating schools had to design and build a tree sculpture using recycled aluminium foil and drinks cans. The winning entries received top-of-the-range camcorders, and the overall winning tree is proudly displayed in our reception area. Runners up prizes included £100 for second place and £50 for third place. All of the schools who took part in the competition received a native fruit tree of their choice, to plant in their school grounds.

This idea of tree planting is further echoed through our corporate support and membership fees to Alupro. Alupro's Tree Campaign focuses on tackling deforestation in Africa whilst at the same time providing the means and know-how to develop small businesses in rural communities in Malawi. A tree will be grown for every tonne of aluminium cans and foil recycled in the UK. The fruit tree, will provide good food as well as the basis for fruit drying and juicing enterprises, adding value to the crop as the trees mature and promoting biodiversity in the region.



Avon was able to rise to the challenge and successfully recycle this waste for his company, providing them with a significant revenue stream. Another member is involved in the airline industry and suggested we look at recycling spent food tray foil and drinks cans from aircraft and airports. We are currently exploring such possibilities together and see this as an exciting project for the future.

Avon Metals have a good relationship with the local Police force and we work closely with them in an attempt to eradicate local crime particularly thefts of valuable metals both from other local companies and at our own facility. The funds generated by such crime is often used to fund drug habits.

Avon supports our staff in their endeavours and activities outside the workplace and has sponsored the football team of one of our employees – Tuffley Rovers. The Company has also made financial contributions to a successful Gloucester school rugby team, with many players filtering into Gloucester Rugby Club and England Juniors.

***“We are proud to be one of the Top 100 Companies in the County”***





## SOCIAL DIMENSION



***“ We believe  
that Good  
Corporate  
Governance  
is key to a  
sustainable  
future”***

PAGE 17

### SDI 15

#### UNITED NATIONS GLOBAL COMPACT SIGNATORY

Avon Metals is a participant in the United Nations Global Compact. Launched by Kofi Annan in 1999, the Global Compact initiative is a network of UN agencies, corporations, NGOs, labour, and academic institutions that endorse a set of principles on human rights (derived from the Universal Declaration of Human Rights), labour, the environment and anti-corruption. Signing the Global Compact affirms our long-standing commitment to strive to conduct business responsibly.

Our Communication on Progress (COP) is made available to stakeholders through the UN Global Compact website.

[www.unglobalcompact.org](http://www.unglobalcompact.org)

and our own corporate internet site [www.avonmetals.com](http://www.avonmetals.com)



### THE 10 PRINCIPLES OF THE GLOBAL COMPACT

#### 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 STANDARDS

##### 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

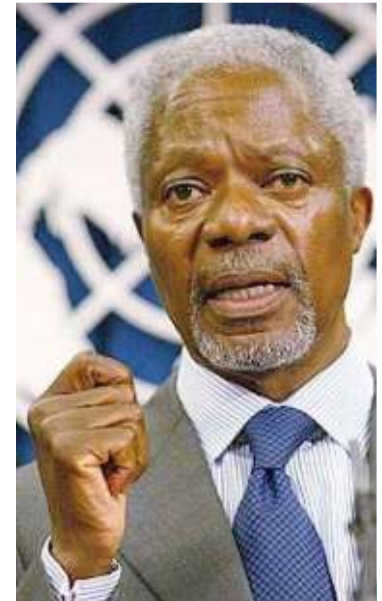
##### PRINCIPLE 9:

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.



Kofi Annan, UN Secretary General

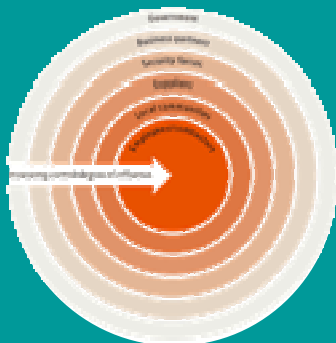
***“We pride  
ourselves  
on our  
honesty  
and  
integrity”***



## SOCIAL DIMENSION



**“We have a Zero Tolerance attitude to human right abuses and child labour”**



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### SDI 16

#### HUMAN RIGHTS (INCLUDING DEVELOPING AN ANTI-BRIBERY AND ANTI CORRUPTION INITIATIVE)

##### HUMAN RIGHTS STATEMENT

*“Avon Metals prides itself on its reputation as a fair and ethically run business. We aim to earn the trust and respect of the businesses and people within our sphere of influence (see diagram), through our core values of transparency, accountability, integrity, solidarity, courage, justice & democracy.”*

Our Human Rights Policy and Human Rights Statement reflect internationally recognised principles - including the United Nations Global Compact and the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work - to promote and protect human rights in the workplace. We abhor human right abuses and child labour and have a “zero tolerance” attitude to these issues.

##### EMPLOYEES

We treat our employees with fairness, respect and dignity. We adhere to all applicable domestic & international laws, include prohibiting child labour, forced labour, and discriminatory behavior (racial, age, gender, religion or other) as well as recognising and acknowledging the rights to freedom of association and collective bargaining. We prefer business partners that treat their employees similarly.

## SUPPLIERS

We endeavour to conduct our daily business in an ethical and responsible manner and select and engage business partners who share our good Corporate Social Responsibility values. We have developed an Anti-Bribery and Corruption policy in line with principles laid down by the World Economic Forum's Partnering Against Corruption Initiative.

Any company wishing to engage with Metals must satisfy the following human rights selection criteria: -

1) It does not employ engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;

2) It does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;

3) It provides a safe and healthy workplace, presenting no immediate hazards to its employees. Any housing provided by the Supplier to its employees is safe for habitation. The Supplier provides access to clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the Supplier's workplace;

4) It does not discriminate against any employees on any ground (including race, religion, disability or gender). it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;

5) It pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;

6) It complies with the laws on working hours and employment rights in the countries in which it operates;

7) It is respectful of its employees right to join and form independent trade unions and freedom of association.

8) It is responsible for controlling its own supply chain and that it shall encourage compliance with ethical standards and human rights by any subsequent supplier of goods and services that are used by Supplier when performing its obligations to Avon Metals.

## LOCAL COMMUNITY

We consult actively with a diverse range of knowledgeable stakeholders to build upon our understanding of the human rights issues present in our operating environments.



## OUR CORE VALUES

**Transparency**

**Accountability**

**Integrity**

**Solidarity**

**Courage**

**Justice**

**Democracy**





## SOCIAL DIMENSION



### AVON METALS ANTI-BRIBERY POLICY STATEMENT

*“The company has a no tolerance policy towards bribery and corruption. This policy extends to all the company’s business dealings and transactions in all countries in which it or its subsidiaries and associates operate. This policy is given force in a detailed anti-bribery Programme which is constantly revised to capture changes in law, reputational demands and changes in the business. All employees are required to comply with this policy.”*

### SDI 16

### HUMAN RIGHTS (INCLUDING DEVELOPING AN ANTI-BRIBERY AND ANTI CORRUPTION INITIATIVE) CONTINUED...

| Step                   | 1   | 2  | 3   | 4   | 5   | 6  |
|------------------------|---|--|---|---|---|--|
| Action                 | Decide to adopt a no bribes policy/   | Plan the implementation  | Develop detailed anti-bribery Programme   | Implement Programme   | Monitor   | Evaluate and improve   |
| Primary responsibility | Owner of company / board / CEO  | Appointed senior manager / Project Team  | Appointed senior manager / heads of department  | Appointed senior manager / line managers / support functions / business partners  | Ethics / compliance officer / Internal and external auditors  | Owner of company / board / CEO / audit committee   |
| Process                | Obtain commitment to no-bribes policy "from the top"<br><br>Decide to implement an anti-bribery Programme<br><br>Decide extent of any public disclosure<br><br>Appoint senior manager / cross-functional Project Team | Define specific company risks / review current practices<br><br>Review all legal requirements<br><br>Write no-bribes policy, develop and write anti-bribery Programme<br><br>Test / get commitment from senior management / selected employees | Integrate no-bribes policy into organisational structure and assign responsibilities<br><br>Review ability of service functions to support new Programme<br><br>Develop detailed implementation plan to include:<br>• adapt HR policies<br>• communications<br>• training programmes<br><br>Set up issues reporting function<br><br>Prepare for incidents | Communicate anti-bribery Programme - internal / external<br><br>Run training courses for all employees and business partners<br><br>Ensure capabilities are in place of specialist functions up to speed: internal audit, finance, legal department<br><br>Deal with incidents<br><br>Review role of Project team | Regular reviews of the system<br><br>Capture knowledge from incidents<br><br>Use external verification providers<br><br>Review use of issues (whistle-blowing) channels | Receive feedback from monitoring<br><br>Evaluate effectiveness of Programme<br><br>Develop improvements to Programme<br><br>Report to management<br><br>Board review and sign-off on Programme<br><br>Publish Programme process and results (optional) |
| Time span              | One Month   | Three to six months  | Three to six months   | One year  | Continuous  | At least annually  |



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.

The PACI brings together companies in multiple industries from all over the world, regardless of 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 an anti-corruption programme to guide the behaviour of our 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.

Avon Metals has developed its Anti-Bribery Programme in conjunction with PACI, the International Business Leaders Forum, and a 6-step implementation plan laid down by Transparency International.



*“We have a Zero Tolerance policy towards bribery and corruption”*



## ECONOMIC DIMENSION



**“Aluminium  
is the  
GREEN  
metal”**



PAGE 20

### SDI 17

#### PRODUCT STEWARDSHIP (INCLUDING PRODUCT LIFE-CYCLE ASSESSMENT)

Avon Metals plays a vital role in developing and providing beneficial products, combating environmental degradation, conserving natural resources and ensuring safe workplaces.

Sustainable recycling is the company's raison d'être and our alloy products are used in a wide array of aluminium products in the automotive, architectural, packaging sectors. Aluminium offers lightweight solutions to design problems, allowing for products that use less raw material and energy.

In 2007 Avon won The Cast Metals Industry Awards supplier of the year awards. The Award is made for the foundry that has taken both itself and the castings industry forward during the past 12 months, through a combination of innovation, expansion, new technology & investment.

Some tangible examples of using our products are: -

#### TRANSPORT

The reduction in weight of a medium size car by 100 kgs through substituting steel with aluminium parts that contain Avon alloys would result in a saving of 900 litres of petrol during the vehicle's lifespan. This would also reduce emission of carbon dioxide by approximately 2 tonnes. There is also immense potential for replacing steel with aluminium in trains.

### PACKAGING

Lightweight drinks cans require about half the amount of fuel for transportation compared with returnable glass bottles.

Avon Metals has designed and manufactured an aluminium pallet as an eco-friendly substitute for conventional timber pallets. Aluminium alloys in the form of ingots are stacked on the pallets making for a totally recyclable & sustainable packaging form - the pallet can either be re-used time and again, or if required it can become sacrificial as its composition is exactly the same as the customers bulk raw material feed. Recycling aluminium requires only 5% of the energy it takes to make new aluminium – and produces only 5% of the CO2 emissions. This route saves a massive 90% in energy costs, creating a huge positive knock on effect to the environment. Since invention, Avon has supplied over 6000 of its aluminium pallets into the industry. Their wooden counterparts would have required valuable natural raw materials and the appropriate disposal through landfill or incineration.

Avon recycles hundreds of tonnes of aluminium foil scrap every year that would otherwise end up in landfill.

Product Life Cycle analysis has shown that as much as 90% of the aluminium we have ever recycled is still in existence in some useful form..

### BUILDING

Aluminium building products, such as window frames and cladding, have good insulation properties and conserve heating energy. A large amount of waste building materials go to landfill, whereas Avon again recycles hundreds of tonnes per annum back into new products.

Avon Metals production of aluminium master alloys that use these elements therefore contributes to the sustainable use of silicon, copper, iron, magnesium, manganese, zinc and other elements. This effectively means that, at today's recycling rate of 4 million tonnes, 200,000 tonnes of alloying elements are simultaneously conserved by the aluminium industry in Europe every year.

### MINOR METALS

Many of the minor metals that Avon trades in have applications that benefit the environment. Two good examples being 1) Rhenium – used at 3-6% in aircraft alloys in turbine engines to assist in leaner burning of fuel. Without Rhenium aircraft such as the Airbus A380 and Boeing Dreamliner would simply not be possible; 2) Silicon metal used in new photovoltaic and solar applications to develop sustainable greener energy resources.



**“Avon  
Metals –  
Recycling  
Aluminium  
for Future  
Generations”**





## ECONOMIC DIMENSION



***“Avon Metals is at the epicentre of the aluminium recycling loop”***



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### SDI 17 CONTINUED....

#### PRODUCT STEWARDSHIP (INCLUDING PRODUCT LIFE-CYCLE ASSESSMENT)

A Life Cycle Assessment (LCA) is a comprehensive scientific examination of both the positive and the negative environmental, social and economic effects of a product at every stage of its existence, from production to disposal, and beyond. It looks at the impacts of the 'product system', including: the mining/extraction of raw materials; fabrication; transportation; use; recycling/ disposal; energy and ancillary material supplies.

LCA of aluminium products may need to consider the production processes of bauxite mining (the first stage in aluminium production); production of alumina (where aluminium oxide is refined from bauxite) and the production of primary aluminium (using electrolysis).

Other steps in the aluminium product life cycle include: several semi-fabrication processes for the production of rolled products, extrusions, wire, tubes, forgings and castings; and concludes with the end-of-life operations (including the recycling of scrap materials and final treatment and disposal of waste and by-products).

Designing aluminium products with efficient production and recycling in mind helps to reduce their impact throughout their life cycle. LCA is used by the aluminium industry to assess and stimulate environmental improvement in production processes and product development, and this in turn can also lead to improvements in the production processes themselves.

For recyclable products such as aluminum, a “cradle-to-cradle” life cycle can be modeled, where recycled material can substitute primary material. Only the material that is lost at the various stages of the life cycle needs to be replaced by primary material as per the illustration.

The use of recycled aluminium further decreases energy consumption and greenhouse gas emissions, when compared to primary aluminium production. This adds further value to the basic reductions already achieved by using aluminium per se - such as in transportation applications.

A typical LCA consists of four main phases: - goal and scope; life cycle inventory; life cycle impact assessment; and interpretation of results and recommendations.

Avon Metals uses its diligent approach to Product Stewardship to address and analyse all these activities with regard to risks, opportunities, and value creation in order to give a holistic overarching view and to find the best overall solutions. The process involves engaging internal decision-makers from R&D, production, marketing, or management, as well as external stakeholders such as suppliers, retailers, customers, consumers, and the general public.

Life cycle product stewardship encompasses a range of issues including best materials and process selection, safe consumer use of our products (Material Safety Data Sheets & REACH) and planning for the recovery or safe disposal of materials.

LCA enables Avon to implement positive sustainability initiatives that can bring about real tangible benefits from its products, such as the design and production of our unique “Alipallet” that replaces its wooden alternatives. These Avon initiatives contribute to our long-term profitability, protection and enhancement of the natural environment, and well-being of the community at large.



***“Life Cycle Assessment promotes sustainability throughout the life of our products”***



## ECONOMIC DIMENSION



**“Our door trade activity contributes nearly £3m per annum to the local economy”**

SDI 18

### FINANCIAL CONTRIBUTION TO THE LOCAL ECONOMY

Thousands of pounds worth of scrap metal is bought and recycled on a weekly basis from a wide array of local suppliers including plumbers, fabrication shops, small metal merchants etc.

We estimate that each year our door-trade ploughs £3 million pounds back into the Gloucestershire economy.

Our door-trade operations are regulated and audited by the Local Council under our Permit to Operate, and have a separate accounting schedule designated to business generated within the local community, and reflects our contribution to the local economy.

Wherever possible Avon Metals endeavours to support the local economy and employ the services of Gloucestershire based companies including haulage contractors, IT specialists, plant maintenance engineers & printers amongst others.

| AVON INPUT INTO GLOUCESTERSHIRE ECONOMY | 2006 | 2007 | 2008 |
|---|------|------|------|
| £ 000's                                 | 1890 | 2987 | 2761 |

Avon Metals has made is a Corporate Partner of Gloucestershire Wildlife Trust and Slimbridge Wildfowl and Wetlands Trust, promoting bio-diversity in the region.

In addition to sponsoring Gloucester Rugby team at corporate events, the Company has made financial contributions to St. Peter's School Rugby Club and Tuffley Rovers Football Club.

In the past 5 years, St Peter's has supplied numerous players to the Gloucester Rugby Club Academy, from which Marcel Garvey and Adam Eustace have gone on to be part of a regular Gloucester first team.

The company is a member of the Gloucestershire First Ambassadors programme and promotes the county at every available opportunity.



**“We endeavour to support the local economy and employ the services of Gloucestershire based companies”**





## ECONOMIC DIMENSION



***“Innovation through R & D underpins our entire product range”***



### SDI 19

#### RESEARCH AND DEVELOPMENT



Through our research and development activities, we are continuing to develop products which give additional social and environmental benefits to our customers and society as a whole. A recent survey conducted by the Carbon Trust highlighted areas of improvements to reduce our Carbon Footprint and the Company has implemented many of the recommendations made (see table to the left). This survey has helped us prioritise known savings as well as identifying new opportunities.

Capital expenditure projects require full ROI (Return on Investment) analysis and associated positive and negative impacts on the environment. The Company is also an active member of the Climate Change Levy scheme operated by the DTI.

Avon Metals works closely with several specialist companies and academic groups to develop new innovative aluminium alloys and is currently cooperating with a metallurgical research company on an EU funded research programme to develop and patent new innovative and advanced aluminium alloys. Several technical papers have been produced and published in major trade related journals and have been met with global critical acclaim.

The company has recently made improvements to the burner systems on its furnaces to ensure maximum yield recovery from raw material and improve fuel consumption efficiency.

| Improvements made as a result of the Carbon Trust survey.  | Rationale   | Co2 savings (Tonnes per annum) | Energy savings (kWh per annum) | Cost Savings (£ per annum) |
|--|---|--------------------------------|--------------------------------|----------------------------|
| Constructed an action plan<br>Formed an Energy Committee<br>Conducted Regular Reviews<br>Improved Staff Awareness<br>Began an active poster campaign | Potential energy savings at the site were highlighted through the creation of a formal framework, increased awareness and improved the monitoring of the areas and levels of energy consumption.  | 234.3                          | 806,370                        | £22,120                    |
| Began a lighting management awareness campaign   | There were many instances when lights were being left on in offices and factory when no personnel were present. Switching of lights when not in use has helped reduce our power consumption.  | 3.0                            | 6,928                          | £424                       |
| Repaired compressed air leaks around the site  | Power from compressed air costs around 10 times the cost of the electricity from which it was made. Leaks found were tagged and repaired as part of our maintenance schedule.   | 15.2                           | 35,476                         | £2,170                     |
| Fitted Passive Infra Red (PIR) controllers to turn lighting off when no personnel are present  | Lighting office areas where there is sufficient daylight or when personnel are not present is wasteful. Fitting a controller that only allows light when personnel are present and daylight is insufficient has minimised our lighting costs. | 1.7                            | 3,905                          | £239                       |
| Replaced halogen floodlights with HP SON lamps in the ingots store   | Incandescent filament lamps such as halogen floodlights are much less energy efficient for a given light output than sodium vapour discharge lamps.   | 3.8                            | 8,938                          | £500                       |
| Investigated turning off casting tracks when not in use  | Eliminating wasteful operations is a worthwhile saving  | 14.3                           | 46,175                         | £1,847                     |
| Fitted Variable Speed Drives to main extractor fan motors  | Variable speed drives allow motors to operate at less than full speed and save energy. If a motor can operate at a 10% reduction, then savings of 25% can be made.  | 51.5                           | 119,700                        | £7,326                     |
| TOTAL SAVINGS MADE   |   | 323.8                          | 1,027,492                      | £34,626                    |

## ECONOMIC DIMENSION



**“The  
world’s  
most widely  
used  
sustainability  
reporting  
framework”**

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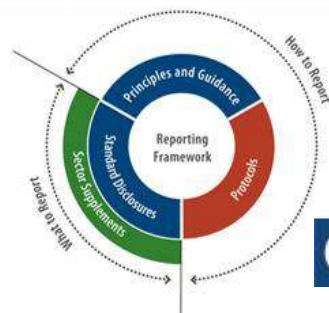
SDI 20

GLOBAL REPORTING INITIATIVE (GRI)



Avon Metals is a voluntary participant in the Global Reporting Initiative - the world's most widely used sustainability reporting framework. The G3 Guidelines (incorporating a Metals and Mining specific supplement developed by the International Council for Metals and Mining) have become the de facto global standard for reporting, and include financial, environmental and social dimensions relating to the company's activities, products and services. GRI collaborates with the United Nations Environment Programme (UNEP), and the United Nations Global Compact. Our Index Reporting is made available to stakeholders through our corporate website and hardcopy Annual Sustainability Report. In 2008, Avon Metals became an Organisational Stakeholder of the GRI, reinforcing our commitment to change.

G3 REPORTING FRAMEWORK



## THE 10 PRINCIPLES OF THE INTERNATIONAL COUNCIL ON MINING & METALS (ICMM)

### PRINCIPLE 1

Implement and maintain ethical business practices and sound systems of corporate governance.

### PRINCIPLE 2

Integrate sustainable development considerations within the corporate decision-making process.

### PRINCIPLE 3

Uphold fundamental human rights and respect cultures, customs and values in dealings with employees and others who are affected by our activities.

### PRINCIPLE 4

Implement risk management strategies based on valid data and sound science.

### PRINCIPLE 5

Seek continual improvement of our health and safety performance.

### PRINCIPLE 6

Seek continual improvement of our environmental performance.

### PRINCIPLE 7

Contribute to conservation of biodiversity and integrated approaches to land use planning

### PRINCIPLE 8

Facilitate and encourage responsible product design, use, re-use, recycling and disposal of our products.

### PRINCIPLE 9

Contribute to the social, economic and institutional development of the communities in which we operate.

### PRINCIPLE 10

Implement effective and transparent engagement, communication and independently verified reporting arrangements with our stakeholders.



**Sustainability**

**Transparency**

**Accountability**

**Reporting**





## MANAGEMENT & LEADERSHIP



***“Management  
is doing  
things right ”***

### MANAGEMENT

Avon Metals’ Directors and Management inspire our people and control resources in line with our established Quality, H&S and Environmental standards.

The Management is responsible for planning what products to sell and make in the future, organising the materials and resources necessary to carry out these plans, motivating others to play an effective part in achieving these plans and monitoring the progress of these plans to ensure they have been implemented correctly.

The Management Team has a combined industry experience of over a century, and works closely with our local Business Link and makes full use of their corporate services such as "the Bridge Process" - a strategic management programme designed to ensure that as a management group there is involvement, clarity, visibility and agreement in the direction that the business is travelling.

The company is either accredited or working towards Management Systems for Quality (ISO 9001), Environment (ISO 14001) and Health & Safety (OHSAS 18001) and is currently conducting a feasibility study on the potential integration of LEAN and Six Sigma techniques into our manufacturing processes.

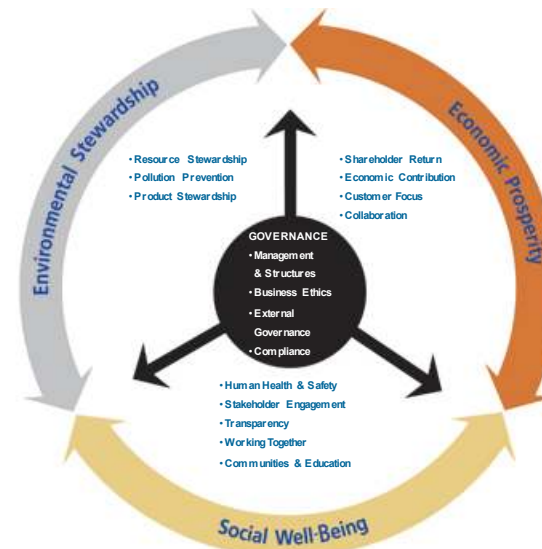
### LEADERSHIP

Avon Metals’ mantra is “leadership through performance and accountability”.

The direction and vision of the company is spearheaded by the Managing Director, Steven Munnoch. In 2007 he was made a Director and Chairman of the Contracts Committee of the MMTA (Minor Metals Trade Association) and he won the Young Business Person of the Year at the 2007 Citizen & Echo Gloucestershire Business Awards.

Our rules for leadership: -

- ✓ Have an open mind a love for travel
- ✓ Good leaders listen as much as they talk
- ✓ Good leaders have a positive attitude and inspire people
- ✓ Good leaders invest in their mind and body
- ✓ A good leader is a student for life
- ✓ A good leader respects and values people at all levels
- ✓ A good leader builds the entire team
- ✓ Good leaders know how to have fun



***“Leadership  
is doing the  
right things ”***



## STAKEHOLDER ENGAGEMENT



***“We aim to create value for all our stakeholders simultaneously”***

### STAKEHOLDER ENGAGEMENT – BRIDGING THE GAP

Avon Metals acknowledges our responsibility to contribute to sustainable development. This requires the company to have a clear understanding of relevant opportunities where it can make a positive contribution. Where appropriate, this includes contribution through assuming a sense of leadership. Our stakeholder engagement works in tandem with our consultation with local communities and considers the wider, not just neighbouring, communities with which we interact.

In particular, the issues which our stakeholders indicate to be of greatest importance are:

- Occupational health and safety
- Economic and social sustainability
- Environmental and product stewardship
- Governance and ethics
- Climate change
- Thefts of scrap metal

### HOW WE ENGAGE OUR STAKEHOLDERS

In the period of reporting, Avon Metals has continued to communicate with a wide range of stakeholders – we believe that active civil society engagement is fundamental to the success of our business. Working in partnership with others in civil society means we can tackle problems and seek solutions acceptable to all parties. Skills and resources can be pooled to achieve outcomes none of us could achieve on our own.

We play an active role within the Minor Metals Trade Association (MMTA) and hold positions on the Executive Committee. We have also continued to play a leading advisory role through participation in a number of sector trade associations and government bodies, including the Aluminium Federation (AlFed); The Institute of Materials, Minerals & Mining; International Titanium Association; Aluminium Packaging Recycling Organisation (AluPRO); Cast Metals Federation (CMF); the British Metals Recycling Association; Gloucester City Council; Gloucester County Council; Beacon South West and the South West Manufacturing Network.

Avon Metals sponsors the Gloucestershire Wildlife Trust and Slimbridge Wildfowl and Wetlands Trust on bio-diversity and wildlife projects.

The company is involved in a number of sustainability and corporate governance initiatives including the UN Global Compact; Global Reporting Initiative & the World Economic Forum's Partnership Against Corruption Initiative.



***“Structured engagement with all relevant stakeholders is fundamental to the way we do business.”***





## STAKEHOLDER ENGAGEMENT



**“Stakeholder Engagement helps to build trust, demonstrate transparency and to identify risks and opportunities.”**

### STAKEHOLDER ENGAGEMENT – BRIDGING THE GAP

#### CONTINUED....

We engage our stakeholders through: -

- One to one dialogue (meeting stakeholders individually)
- Open exchange (round tables with other Beacon companies)
- Open doors (site visits to customer sites)
- Partnerships

Stakeholder engagement at Avon Metals is carried out throughout the year and is integrated into business decision making processes.

Complementing our stakeholder meetings, Avon Metals' Directors also meet regularly with our major shareholders regularly.

At these meetings we discuss matters relating to corporate social responsibility and sustainability, together with the performance and development of the business.

| Stakeholder Group      | Engagement method                                      | Engagement frequency           | Key topics and concerns   | Response                                | Reporting method                           |
|------------------------|--|--------------------------------|---|---|--|
| Customers              | Verbal<br>Electronic<br>Face to face<br>Questionnaires | Daily                          | Quality<br>Environmental<br>Legislation<br>Commercial                           | Regular updates                         | One to one                                 |
| Raw material suppliers | Verbal<br>Electronic                                   | Daily                          | Commercial<br>Environmental<br>Sustainability                                   | Quality claims<br>Contracts             | One to one<br>Mentoring                    |
| Service providers      | Partnership  | As required<br>Ad hoc dialogue | Stability   | Improvement in service                  | Report to Directors                        |
| Trade Associations     | Partnership<br>Open exchange<br>Open doors<br>Lobbying | As required<br>Ad hoc dialogue | Legislation<br>Membership   | Compliance                              | Update reports<br>Minutes<br>Open days     |
| Police                 | Partnership  | Weekly                         | Stolen Goods<br>Crime prevention  | Robust Systems<br>Report<br>Suspensions | Direct                                     |
| Initiatives            | Partnership<br>Open exchange<br>Open doors             | Quarterly                      | PACI<br>Global Compact<br>Reach   | Continuous monitoring                   | Update reports<br>Minutes                  |
| Shareholders           | Verbal   | Weekly                         | Profit & loss<br>Cap-Ex<br>Finance  | Assistance where required               | Weekly management meetings                 |
| Environment Agency     | Email<br>Verbal<br>Site visits                         | Monthly                        | Emissions<br>Packaging waste  | Compliance with legislation             | Open site                                  |
| Workforce              | Open Forum<br>Works Council<br>Feedback logs           | Daily                          | H&S<br>Training<br>Welfare  | Continuous improvement                  | Published actions<br>Cascade communication |
| Management             | Review meeting   | Daily                          | Raw materials<br>Future sales<br>Trading<br>Production<br>Operations<br>Finance | Continuous improvement                  | Minutes                                    |



## AWARDS & ACCREDITATIONS



### 2007 CONTINUED...

Winner – Cast Metals Federation Supplier of the Year

Winner – Gloucestershire Ambassador's Book Check Cup for outstanding contribution to the region

### 2006

Runner Up – Valpak Awards, Best Investment of PRN Revenue

Avon Metals is also proud to have featured in the top half of the Top 100 companies in Gloucestershire in 2007 & 2008.

### ACCREDITATIONS

#### 2007

ISO 14001 Environmental Management System

Beacon South West status



### AWARDS & ACCREDITATIONS

Avon Metals is an entrepreneurial forward thinking company, and as such we rarely get chance to reflect on the past.

However, it is always nice to have success acknowledged by our peers and over the past few years we have received a plethora of prestigious environmental, social & economical awards in recognition of our achievements.

#### 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. The Queen's Award flag is proudly flown at our Gloucester premises.

Winner - International Trade Award in the Gloucestershire Business Awards

Winner – Steven Munnoch, Young Business Person of the Year in the Gloucestershire Business Awards



**“We believe  
that your  
success is  
key to  
ours”**

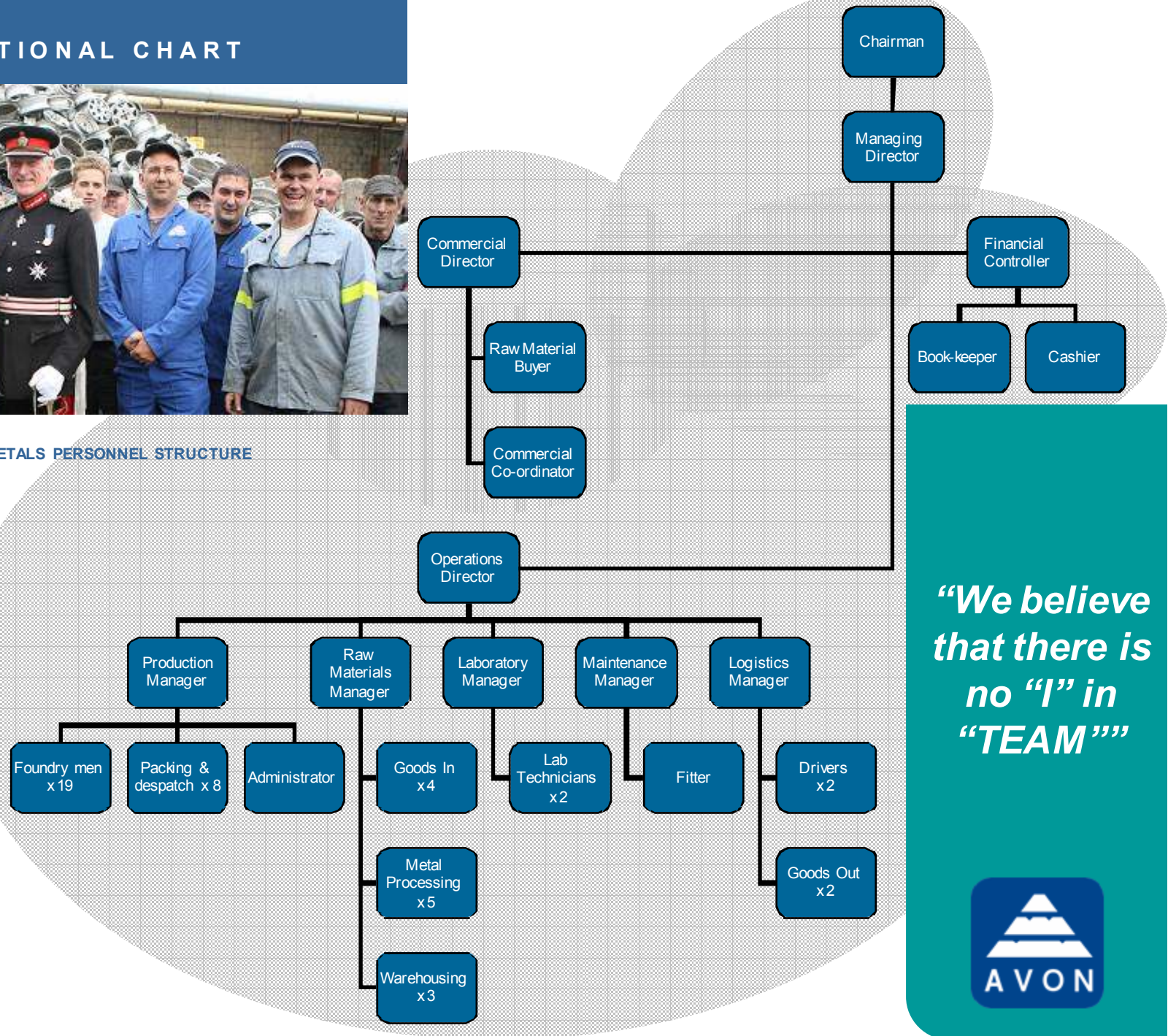




## ORGANISATIONAL CHART



AVON METALS PERSONNEL STRUCTURE



*“Every single one of our employees is central to the delivery of our sustainability strategy”*

*“We believe that there is no “I” in “TEAM””*



## CONTACT DETAILS



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## CONTACT DETAILS

Your feedback is important to us.

For any questions or comments  
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***“Thank  
you for  
sharing in  
Our 20/20  
Vision”***



***“We  
would  
like to  
know  
what you  
think”***



