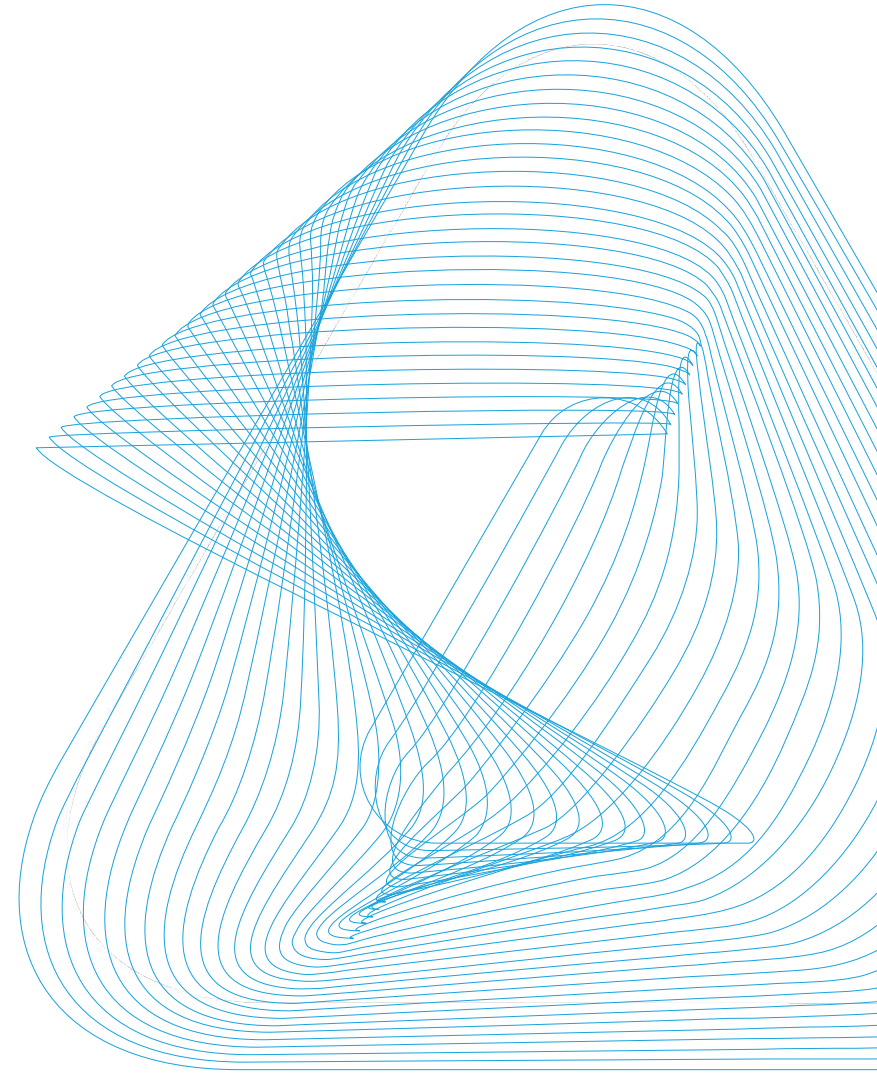


ESG Download

Avery Dennison ESG Reporting

March 2021



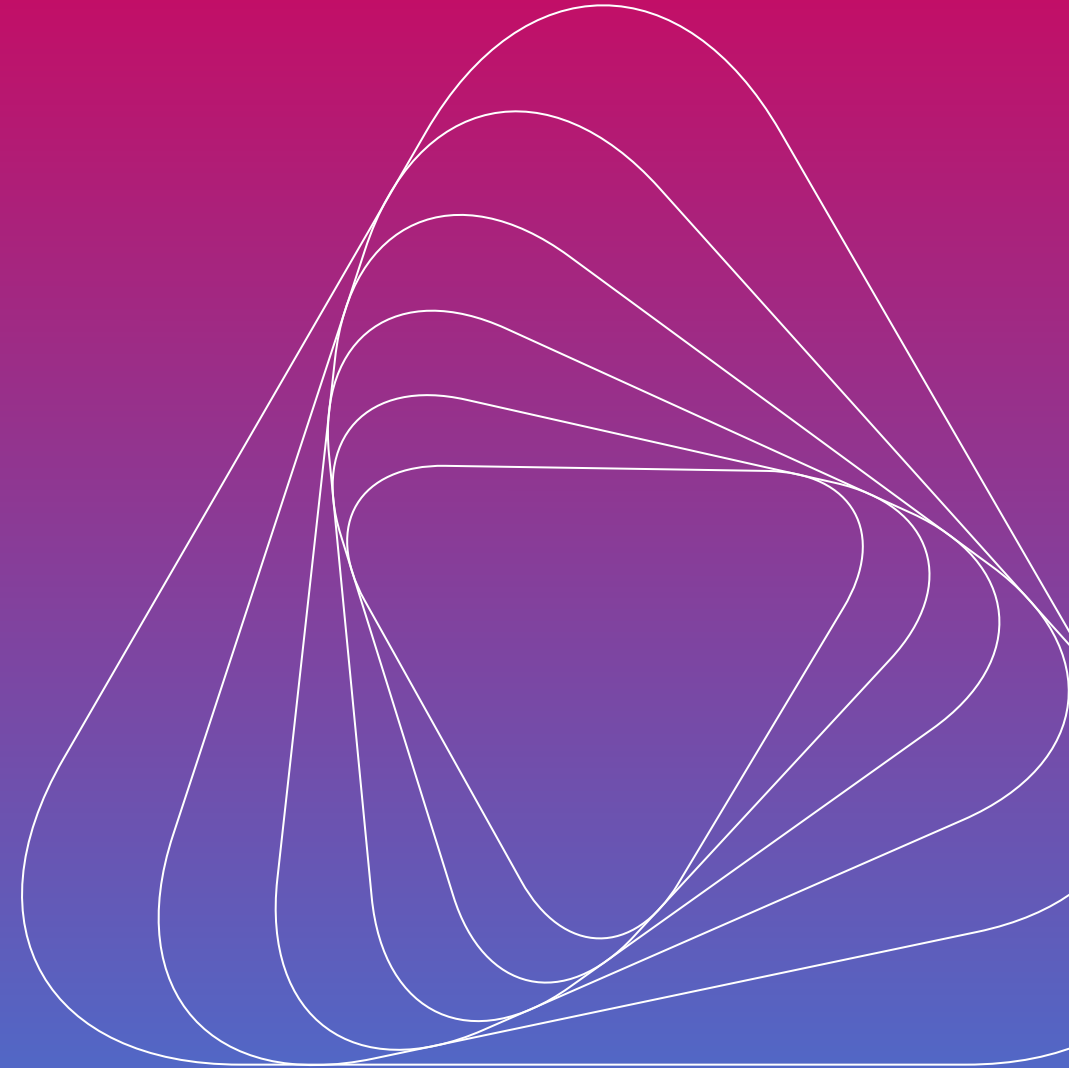
The Sustainability Accounting Standards Board (SASB) categorizes Avery Dennison within its Containers & Packaging sub-sector, under its Sustainable Industry Classification System (SICS).

Our packaging-related reportable segment, Label and Graphic Materials (LGM), made up 68% of our total sales in 2020. LGM's materials enhance shelf and store appeal for brands, inform shoppers of ingredients, protect brand security, improve operational efficiency and customer product performance, and provide visual information that enhances safety.

Our Retail Branding and Information Solutions (RBIS) and Industrial and Healthcare Materials (IHM) segments made up 23% and 9% of total sales, respectively, in 2020. RBIS' products include RFID, brand embellishments, graphic tickets, woven and fabric labels, heat transfers, software, printers and consumables. Our IHM business provides tape products, fasteners and adhesive materials for both industrial and medical applications.

We chose to include SASB sector standards from the Containers & Packaging, Apparel, Accessories & Footwear and certain relevant Chemical indicators.

The sustainability data provided in this download is unaudited.



Scope

Unless specifically stated, this download covers acquired businesses that have been owned for a full calendar year.

Any indicators that include Smartrac data will so specify.

Owing to data availability, specific data points and indicators on certain topics only show partial-year data.

In these cases, the time period will be clearly indicated, and the full year data will be provided after it becomes available.

This document does not include employee data for Yongle Tapes, or any information on the recently acquired ACPO.

Definitions

Facility: Avery Dennison uses the term “facility” to describe any location which we own or lease. This designation includes all locations, including manufacturing, distribution centers/converters, research and development, warehouses, fast response units or office locations.

Manufacturing Facilities: Avery Dennison uses the term “manufacturing facility” to describe any location in which products are manufactured. This designation excludes converters/distribution centers, warehouses, research/development centers and fast response units.



Avery Dennison 2020 Materiality Matrix

March 2021



	Discussion	Source
Disclosures		
SASB	Avery Dennison is categorized as Containers and Packaging under SASB's SICS system. In this ESG Download, we also included SASB indicator codes for the Apparel, Accessories and Footwear and certain relevant Chemical indicators.	
GRI	We published sustainability reports beginning in 2008 (moving to annual reporting with our first integrated financial and sustainability report for 2019) and have reported in accordance with GRI since 2010. In 2020, we transitioned from GRI indexing in our Integrated Report to indexing in this ESG Download.	
CDP	We have responded to CDP Climate since 2010, and CDP Water and CDP Forests since 2015 and 2016, respectively. During 2020, we were rated A- for Forests and B for Water and Climate.	CDP Responses
Science-Based Targets	Our approach is based on the 3% solution developed by the World Wildlife Fund, CDP and McKinsey & Company.	
UN Global Compact	In November 2020, we joined the UN Global Compact and will be disclosing progress in our annual commitments on progress. First disclosure will be in November 2021.	Annual Reporting
Sustainable Development Goals	In November 2020, we made commitments to the UN Sustainable Development Goals and subsequently aligned our most material sustainability topics to focus within these 17 goals.	SDG Alignment
Sustainable Apparel Coalition	We have been a member of the Sustainable Apparel Coalition (SAC) since 2012, and we conduct HIGG Facility and Environmental Module (FEM) audits, and Facility Social and Labor Module (FSLM) audits on Retail Brand and Information Solutions (RBIS) manufacturing facilities. These audits are held in the HIGG index available to SAC members.	HIGG Index

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Climate Change								
Climate Change Policy							We are committed to reducing greenhouse gas (GHG) emissions throughout our value chain. Our Climate Policy details our strategy, oversight and response to climate-related issues within our organization and throughout our value chain. As a World Wildlife Fund Climate Savers partner, member of the Renewable Energy Buyers Alliance, and signatory of the American Business Act on Climate Pledge, we support the global effort to reduce GHG emissions.	Climate Policy
Board Oversight of Climate Strategy							Our Board's Governance Committees responsibilities include overseeing climate change risks and opportunities. We consider climate-related risks in our Enterprise Risk Management process (conducted formally twice each year), the results of which are reported to our Board of Directors.	Climate Policy CDP Climate - Section C3.1c
Climate Change Strategy							<p>Our Energy and Climate Change Strategy corresponds with our business and sustainability strategies and includes an established science-based target to reduce absolute GHG emissions by at least 26% (3% per year) by 2025, compared to our 2015 baseline. In 2021, we expanded our commitments to reduce our emissions by 70% and work with our supply chain to reduce Scope 3 emissions by 30% by 2030 - with an <u>ambition</u> of net zero by 2050.</p> <p>Our Sustainability Charter lays out the primary tenets of how we refine our business strategy to integrate sustainability and climate change through the goals described below:</p> <p>More sustainable products: We will improve the energy and carbon footprint of our products and services through innovation and life-cycle management. For example, our life-cycle assessment (LCA) tool houses our environmental product information, which we use for internal decision making and discussions with customers.</p> <p>More sustainable processes: We will improve the energy and GHG efficiency of our operations and will work toward continual improvement at all our facilities.</p> <p>More sustainable purpose: We will communicate and engage with key stakeholders to achieve our energy and climate change goals and advance the interests of customers, shareholders, employees and the communities where we operate.</p>	

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Climate Change								
Climate change-related risks & opportunities							The aspects of climate change that have influenced our strategy include regulatory, physical and consumer-related risks and incentive-based opportunities. The most substantial business decision made was expanding use of LCA in product design. We also partnered with and joined NGOs that focus on GHG reduction. These activities were influenced by stakeholder requests, brand differentiation goals and a desire to lead in sustainability and energy cost reduction.	CDP Climate - Section C3.1c
Incentives for management around climate change							One of the strategic pillars by which our CEO's annual performance is evaluated includes progress towards our sustainability goals. Specifically, the following objectives were considered for 2020: <ul style="list-style-type: none"> - Continue to reduce GHG emissions - Develop accelerated roadmap to enable greater recyclability of consumer packaged goods in LGM - Further increase leadership diversity 	CDP Climate - Section C3.1c 2021 Proxy Statement pg 67
Internal price of carbon							We are evaluating the use of an internal price for carbon.	CDP Climate - Section C11.3

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Greenhouse Gas Emissions								
Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	RT-CP-110a.1	305-1 305-2	537K	503K	474K	294K*	<p>We report GHG emissions as Scopes 1 and 2 combined.</p> <p>We measure market-based GHG emissions from our operations, which includes our purchase of renewable energy credits (RECs) to offset some of our electrical consumption from the grid. We measure overall GHG emissions to track progress against our 2025 GHG emission reduction target, but do not currently measure Scope 1 and 2 emissions separately. Data is available to calculate the portion of total GHG emissions that are Scope 1 (47% in 2020) and Scope 2 (53% in 2020), but it requires separate, manual calculations beyond of our data software capabilities at this time.</p> <p>GHG emissions are measured in metric tons (t) of carbon dioxide (CO2) equivalent (e). Our 2019 location-based Scope 2 emissions are available in our 2020 CDP response.</p>	<p>CDP Climate Response</p> <p>Climate Policy</p>
Total GHG emissions (Scope 1+2)							<p>We do not currently report Scope 1 emissions covered by emissions-limiting regulations.</p> <p>CDP data for 2020 will be available once released by CDP in 2021.</p> <p>* 2020 data is as of September 30, 2020.</p>	
Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets and an analysis of performance against those targets	RT-CP110a2						<p>Our goal is to achieve at least a 3% absolute reduction of Scope 1 and 2 emissions year-over-year. Based on the 3% solution developed by the World Wildlife Fund, CDP and McKinsey & Company, we plan to cut emissions by at least 26% by 2025, which we have already exceeded. We implemented several initiatives in 2019 to reduce Scope 1 emissions and reported our progress in our most recent response to CDP Climate.</p> <p>In 2021, we advanced our strategy, with the goal of reducing our emissions by 70% and working with our supply chain to reduce Scope 3 emissions by 30% by 2030 - with an <u>ambition</u> of net zero by 2050.</p>	<p>CDP Climate Response</p> <p>Climate Policy</p> <p>2020 Integrated Report pg 15</p>

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
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Greenhouse Gas Emissions

Emission reduction activities							<p>The majority of our emission reduction activities come from renewable energy projects, which are applied across our global manufacturing footprint.</p> <p>Emission reductions have been achieved through a portfolio of activities, including energy efficiency improvements, fuel switching to less emissions-intensive fuel sources, renewable electricity sourcing via on-site, owned solar, direct wind and solar power purchase agreements (PPAs), and procurement of renewable energy credits.</p> <p>In June 2020, our U.S. virtual wind PPAs came to fruition. This is an 82 turbine, 230 MW Plum Creek wind project that yielded 64,224 MWh of renewable power during the year.</p>	<p>Climate Policy</p> <p>CDP Climate - Sections C7.9a and C3.1d</p> <p>2020 Integrated Report pg 17</p>
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Air Quality

Air emissions of the following pollutants:							<p>Of our 217 facilities, as of December 31, 2020 only 57 - or 26% - produce air emissions such as nitrogen oxides (NOX), sulphur oxides (SOX), volatile organic compounds (VOCs) or particulate matter.</p> <p>Of our 132 manufacturing facilities, as of December 31, 2020 only 57 - or 43% - produce air emissions such as NOX, SOX, VOC's or particulate matter. This data includes our recently acquired Smartrac facilities.</p> <p>These non-GHG emissions, which are primarily VOCs, are measured based on local permit requirements. The resulting data is captured at the facility level and is not available at an enterprise level at this time.</p> <p>VOC emissions are tracked at the site level. Our VOC data is not available at the enterprise level at this time.</p>	
(1) NOX (excluding N2O)								
(2) SOX	RT-CP-120a.1	305-7						
(3) volatile organic compounds (VOCs)								
(4) particulate matter (PM)								

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Energy Management								
Total energy consumed	RT-CP-130a.1	302-1	6,324K	6,262K	6,003K	4,340K*	Total energy consumption is measured in gigajoules (GJ). * 2020 data is as of September 30, 2020.	CDP Climate - Section C8.2a
Percentage grid electricity	RT-CP-130a.1	302-2	34%	35%	36%	36%*	During 2020, 36% of our total energy consumption came from grid electricity. * 2020 data is as of September 30, 2020.	CDP Climate - Section C8.2aC
Percentage renewable	RT-CP-130a.1	302-3	11%	12%	14%	19%*	Though our current use of renewable energy is low compared to our overall energy consumption, we anticipate that it will increase due to our U.S. wind virtual power purchase agreement (vPPA) that began in June 24, 2020. In 2020 this vPPA generated 64,224 MWh during the calendar year towards our operations. * 2020 data is as of September 30, 2020.	CDP Climate - Sections C3.1d and C8.2a 2020 Integrated Report pg 17
Total self-generated energy	RT-CP-130a.1	302-4					We self-generate less than 1% of our total energy consumption, primarily through backup diesel generators, in Scope 1. In addition, certain facilities also operate windmills and solar panels that generate electricity for ourselves and the grid.	
Activities to reduce energy consumption		302-4					We have a public commitment to reduce GHG emissions by 3% per year. Within the overall strategy of GHG reduction, we have a specific strategy and focus on initiatives and projects to address energy efficiency. Our facilities currently have completed 43 projects with an estimated annual energy reduction of 31,567 MWh per year.	
Energy/Renewable energy targets							Our LGM and RBIS businesses have annual energy intensity reduction targets of 2% and 3%, respectively, measured as MWh of electricity and natural gas consumed per unit of production. As of September 30, 2020 our LGM business reduced the energy intensity of its manufacturing facilities by 19.2% compared to its 2015 baseline, an average reduction of 3.8% per year. Over the same period of time, our RBIS Apparel business reduced energy intensity by 36%, an average reduction of 8.6% per annum. We are committed to reducing energy intensity in each of our facilities, in line with our overall climate strategy.	2020 Integrated Report pg 17

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Water Management								
(1) Total water withdrawn							Water withdrawal is measured in millions of gallons. We currently do not track water consumption; however, we plan to start data collection in 2021. Water usage is relatively low in our direct operations.	
(2) Total water consumed								
(3) Percentage of each in regions with High or Extremely High Baseline Water Stress	RT-CP-140a.1	303-1	1) 528	1) 579	1) 540	1)331* 3)47.6%*	The World Resources Institute (WRI) Aqueduct Tool allows us to directly see by geography how many of our sites are in an area of water stress. We assess our sites annually and analyze the data based on risk level (extremely high, high, medium high, medium low, low).	
							* 2020 data is as of September 30, 2020.	
Description of water management risks and discussion of strategies and practices to mitigate those risks	RT-CP-140a.2						Despite analyzing our water consumption and determining we use a relatively insignificant amount in our direct operations, we believe we have a commitment and responsibility to reduce our environmental impact wherever possible. Therefore, when we set our 2030 sustainability goals, we included water. We have committed to delivering a 15% increase in water efficiency at our sites that are located in high or extremely high risk countries as identified in the WRI Aqueduct Tool. Accordingly, we conduct an annual water assessment using the WRI Aqueduct Tool to determine site-specific priorities and opportunities. Water data from our global facilities is collected and analyzed based on Aqueduct Risk Level. Sites in geographical areas determined by the assessment to have an extremely high or high water risk level are prioritized for potential projects. Please read more in our Water Policy .	Water Policy
Number of incidents of non-compliance associated with water quality permits, standards, and regulations	RT-CP-140a.3		0	3	1	0	In 2019, we had one incident of exceeding our discharge permit, which occurred at our Peachtree, GA facility. We exceeded the permit limit for Chemical Oxygen Demand, meaning the amount of oxidizing agent needed to fully oxidize the organic compounds in the wastewater into carbon dioxide was slightly higher than allowed by our permit. The limit was 1,500 mg/liter, and our water discharge was found to contain 1,520 mg/l. The discharge was retested and found to be in compliance.	
Water Policy							We have a publicly available Water Policy.	Water Policy
Effluent Management Program							This treatment method consists of each facility sending its wastewater effluent to a public or community treatment facility to be properly treated. Once the wastewater arrives at the treatment facility, it is treated through physical, chemical and/or biological processes.	

Disclosure of water had previously stated withdrawals as consumption.

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Hazardous Waste Management								
Hazardous waste							<p>We have made public commitments to reduce waste as part of our sustainability goals. The strategy and targets to reduce hazardous waste is encompassed within our broader waste reduction plan. During 2021, we plan to disclose a waste reduction policy.</p>	
Amount of hazardous waste generated; percentage recycled	RT-CP-150a.1	306-2	17K 14%	16K 17%	18K 23%	12K* 25%*	<p>By 2025, our goal is for our operations to be 95% landfill-free, with 75% of our waste reused, repurposed or recycled. Each site must set waste reduction goals based on its waste generation and corporate or divisional goals. In 2021 we increased our goal, so that by 2030 we plan to divert 95% of our waste from landfills, with a minimum of 80% waste recycled and the remainder either reused, composted or sent to energy recovery.</p> <p>We have made public commitments to reduce waste as part of our sustainability goals. The strategy and targets to reduce hazardous waste are encompassed within our broader waste reduction plan. During 2021, we plan on publicly disclosing a waste reduction policy. Chemical waste and contaminated materials must be handled in accordance with Global Standard 3.01-Waste Management.</p> <p>Hazardous waste is measured in metric tons (t) and by percentage recycled. 2020 data includes our recently acquired Smartrac facilities.</p> <p>* 2020 data is as of September 30, 2020.</p>	2020 Integrated Report pg 15

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Waste Management								
Percentage of waste diverted from landfill		306-3	91%	93%	94%	94%*	We have a goal to divert 95% of our waste away from landfills, with a minimum of 80% of our waste recycled and the remainder either reused, composted or sent to energy recovery. 2020 data includes our recently acquired Smartrac facilities. * 2020 data is as of September 30, 2020.	2020 Integrated Report pg 14
Percentage of waste sent to landfills		306-2	8.1%	6.6%	5.7%	6.1%*	We have a goal to divert 95% of our waste away from landfills, with a minimum of 80% of our waste recycled and the remainder either reused, composted or sent to energy recovery. 2020 data includes our recently acquired Smartrac facilities. * 2020 data is as of September 30, 2020.	
Percentage of waste recycled			62%	64%	65%	67%*	2020 data includes our recently acquired Smartrac facilities. * 2020 data is as of September 30, 2020.	2020 Integrated Report pg 14
Provide data on significant spills			34	37	24	15	Defined as release to the environment (air, water, earth) where the quantity exceeds (a) 5 gallons/20 liters, (b) a Reportable Quantity in the U.S. or (c), which requires notification to a governing agency (excluding water). Most of the spills occurred inside a building and were contained and cleaned with minimal or no impact to the environment.	

2017 data points for the following indicators have been updated in this document from prior disclosures:

- Percentage of waste diverted from landfill previously stated as 92.9%
- Percentage of waste sent to landfills previously stated as 7.1%

Disclosure percentage of waste recycled had been stated in prior disclosures as “percentage of diverted material recycled”

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Biodiversity								
Approach to evaluating and managing biodiversity concerns		304					<p>Our Responsible Paper Sourcing Policy addresses measures we take to minimize wood fiber sourced from potentially controversial locations, including those with significant ecological value. To help achieve these goals, we have partnered with the Rainforest Alliance to provide support in policy implementation and validation of wood fiber materials sourced by our LGM and RBIS business groups.</p> <p>In 2021, we performed our ninth assessment with Rainforest Alliance.</p> <p>Within CDP Forest disclosures, we provide further information on our approach to biodiversity.</p>	<p>Responsible Paper Procurement Policy</p> <p>CDP Forest Response</p>
Environmental Management Systems								
Percentage of operations certified						24%	As of December 31, 2020, 32 of our 217 facilities have ISO Certification. Of these facilities, 132 are manufacturing facilities, and 24% of these facilities have ISO Certification. This data includes Smartrac facilities.	
Number of locations with Environmental Audits			15 Corporate	16 Corporate 18 HIGG FEM	17 Corporate 18 HIGG FEM	4 Corporate 19 HIGG FEM	<p>We are continually auditing our facilities to ensure they are compliant with Environmental and Health and Safety requirements. These audits are undertaken through two main routes. One is our Corporate EHS audits, which are led by our own specialist teams. The second method is through the HIGG FEM audits, which are led by external auditors.</p> <p>The lower Corporate number in 2020 is a result of COVID-19 restrictions and limited access to the site. These audits were conducted virtually.</p>	

Environment	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion
Environmental Impacts in the Supply Chain							
Percentage of (1) Tier 1 supplier facilities and (2) supplier facilities beyond Tier 1 in compliance with wastewater discharge permits and/or contractual agreement	CG-AA-430a.1				1)100%	1)100%	<p>Avery Dennison RBIS joined the SAC in 2012 as the first solutions provider in the network. According to SAC criteria, we consider our manufacturing facilities as Tier 1 factories.</p> <p>In 2019, we implemented a full manufacturing restricted substance list (M-RSL) according to the Zero Discharge of Hazardous Chemicals (ZDHC) Program's restricted substance list. Our M-RSL is implemented across our entire supply chain.</p> <p>We monitor wastewater quality at owned manufacturing facilities. 100% of our manufacturing facilities comply with wastewater discharge permits and/or contractual agreements. We conduct regular tests according to ZDHC wastewater guidelines. We disclose results from three key manufacturing facilities on public platforms including ZDHC Gateway and IPE. In 2020, these three manufacturing facilities produced approximately 45% of Avery Dennison RBIS Apparel's global product.</p> <p>We do not currently track wastewater compliance of suppliers. We require suppliers to comply with the M-RSL requirement, which restricts harmful substances and chemicals used in our manufacturing facilities.</p>
Percentage of (1) Tier 1 supplier facilities, and (2) supplier facilities beyond Tier 1 that have completed the Sustainable Apparel Coalition's HIGG Facility Environmental Module (HIGG FEM) assessment or an equivalent environmental data assessment.	CG-AA-430a.2					1) 61%	<p>Avery Dennison RBIS joined the SAC in 2012 as the first solutions provider in the network. According to SAC criteria, we consider our manufacturing facilities as Tier 1 factories.</p> <p>In 2017, Avery Dennison RBIS implemented HIGG FEM audits of major manufacturing facilities. HIGG FEM audits are third-party verified and posted in the HIGG platform. Because of its recent relocation, one RBIS site in Pakistan was not third-party verified.</p> <p>In 2020, Avery Dennison RBIS Apparel conducted 19 HIGG FEM audits, which validate 2019 data. This represents 61% of its manufacturing facilities.</p> <p>In 2021, Avery Dennison RBIS will be piloting the use of HIGG FEM audits into the supply chain with key outsource partners.</p>

Social Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Human Rights								
Human Rights Policy							<p>We address human rights concerns regarding our operations and supply chain through our Human Rights Policy.</p> <p>Within our RBIS business units, all manufacturing locations and outsource suppliers are regularly audited against our social standards. In 2020, this encompassed 20,806 employees within Avery Dennison-owned facilities and 144 social audits of our owned locations. We also conducted an additional 259 social audits of our outsource suppliers in 2020.</p>	Human Rights Policy
Human Rights or other policy covers community consultations and indigenous rights							<p>As a significant stakeholder in the supply chain of pulp and paper products, we recognize our important role and opportunity in promoting and providing sustainable and socially responsible paper products. Wood fiber is not harvested in violation of internationally accepted guidelines and treaties to protect human rights of indigenous peoples. Our Human Rights Policy outlines our commitments to human rights within our supply chain.</p>	Responsible Paper Procurement Policy
Policy Against Child Labor							<p>Neither we nor our suppliers may use child labor. The term “child” refers to a person younger than 15 or the local legal minimum age for employment, whichever is higher. Our Human Rights Policy outlines our commitments, and our Social Compliance Supplementary Manual discusses conditions for juvenile workers and required actions if an instance of child labor is discovered.</p>	Supplier Standards Human Rights Policy

Social Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion
Product Safety							
Strategy to (1) manage chemicals of concern and (2) develop alternatives with reduced human and/or environmental impact	RT-CH-410b.2						<p>We implemented restricted Substance list (RSL) programs both company-wide and within business units. These programs list chemicals of concern identified by governments, credible NGOs and customers that are banned or restricted depending on risk. In addition, we maintain a “watch list” of chemicals that must undergo a rigorous alternatives assessment and be approved by a committee of technical leaders prior to use in new products.</p> <p>Our RBIS reportable segment maintains its own RSL program that restricts more chemicals of concern relevant to the apparel and footwear industry in both existing and new products.</p>
Discussion of processes to maintain compliance with restricted substance regulations	CG-AA-250a.1						<p>Our product compliance teams, in each business unit and at the corporate level, regularly monitor regulations and other developments applicable to our products. Monitoring is done through subscriptions to different government agencies such as EUROPA/CPSC, industry groups, and regulatory and chemical tracking and management service providers (AAFA, C2P, chemical watch, Yordas Hive). We notify affected stakeholders in our company when relevant developments occur to implement appropriate actions.</p>
Discussion of processes to assess and manage risks and/or hazards associated with chemicals in products	CG-AA-250a.2						<p>We implemented RSL programs company-wide and within business units which identify and restrict chemicals of concern. To assess and manage risks from these chemicals, we work with our suppliers and product development teams to identify and reduce chemicals of concern wherever feasible in our products. We also implemented a strict assessment and approval process to minimize or avoid chemicals of concern in new products.</p> <p>Our RBIS reportable segment maintains an RSL and M-RSL encompassing additional legal requirements from regulations (REACH, CPSIA, RoHS, Cal Prop 65), industry standards (Oeko-tex, ZDHC MRSL, AAFA RSL, AFIRM RSL) and customer standards in the apparel and footwear industry. RBIS requires all suppliers to certify that materials they supply to us meet our RSL requirements. In 2020, RBIS conducted over 2,226 tests of raw materials and products to confirm compliance with its RSL.</p>
Number of recalls issued Totals units recalled	RT-CP-250a.1		0 0	0 0	0 0	0 0	We have not issued any product recalls from 2017 - 2020.
Discussion of process to identify and manage emerging materials and chemicals of concern	RT-CP-250a.2						<p>We implemented a “Regulatory Early Warning System” that uses a comprehensive approach to identify and track new developments globally in product and chemical regulations, safety and environmental impacts.</p> <p>This system tracks issues regarding emerging and ongoing chemicals of concern and their use in products and manufacturing, as well as notification of affected stakeholders in our company to allow early and effective issue response and management.</p>

Human Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Occupational Health and Safety								
Health and Safety Policy							<p>We comply with all applicable environmental, health and safety laws. Furthermore, our company goes beyond the legal requirements whenever, in our judgment, it is prudent to do so.</p> <p>Over the last two decades, we've steadily improved our practices and increased employee involvement and training to achieve a world-class safety record.</p> <p>Our EHS Audit Program includes compliance auditing for industrial hygiene and safety-related issues.</p>	
(1) Total recordable incident rate and (2) fatality rate for direct employees and contract employees	RT-CH-320a.1	403-2	TRIR: 0.28	TRIR: 0.26	TRIR: 0.24	TRIR: 0.21	<p>In 2019, we experienced our first employee fatality in over 20 years. At our facility in Malaysia, an employee died while operating a machine. We provided financial support for the employee's family as well as grief-counseling services for employees at the site. Our people are at the heart of our business, and our top priority is to ensure that every employee arrives home healthy and safe each day. We conducted a full investigation of the incident and a complete review of our safety procedures, and we reinforced our safety protocols to our global workforce.</p> <p>LTIR: Lost Time Injury Rate.</p> <p>2020 data includes our recently acquired Smartrac facilities.</p>	2020 Integrated Report pg 14
Efforts to assess, monitor and reduce exposure of employees and contract workers to long-term (chronic) health risks	RT-CH-320a.2		LTIR: 0.16	LTIR: 0.17	LTIR: 0.12	LTIR: 0.11	<p>Our effort to assess and monitor exposure of employees and contract workers to long-term health risks is managed on a site-by-site basis. Each site evaluates potential exposures and develops in-house monitoring plans.</p>	

2019 data points for the following indicators have been updated in this document from prior disclosures:

- TRIR, previously stated as 0.23

Human Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Labor Relations								
Statement of commitment to a fair or living wage for all employees							<p>Our employees are our most important asset. We have merit-based programs and/or general increase programs based on local market analysis or comparable positions to assist in our objective to provide fair and competitive compensation and benefits to all our employees.</p> <p>Our business units must comply with all applicable local laws, including those pertaining to wages, overtime and benefits.</p>	
Paying temporary contract workers minimum wage and/or other employment benefits							<p>Suppliers, contractors and subcontractors must compensate all employees in compliance with all applicable local laws pertaining to wages, including overtime and benefits. Suppliers and subcontractors may not make deductions from pay for disciplinary infractions, reporting unfair or illegal practices, or other "whistleblowing" activities.</p> <p>Within our RBIS business units, we make a commitment that our contingent workforce will not exceed 10% of the total workforce, contracts will not exceed six months and all contingent workers will be paid the same as an entry-level employee in the same role. We completed 22 audits against this standard operating practice in 2019 and will repeat auditing protocols in 2021.</p> <p>Our contingent workforce comprises less than 5% of our total employee base, including Smartrac employees.</p>	<p>Supplier Standards</p> <p>Social Compliance Supplementary Standards</p>
Evidence of collective agreements		102-41 407-1					There are multiple collective agreements in place across our enterprise, some industry-wide by country and others specific to our locations. In some countries, there are no agreements.	

Human Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Diversity and Inclusion								
Non-Discrimination Policy							We are committed to treating every employee fairly and with respect. That means we provide equal opportunity to all employees and applicants. We prohibit unlawful discrimination or harassment because of race, color, religion, sex, pregnancy, national origin, ancestry, citizenship, age, marital status, physical disability, mental disability, medical condition, sexual orientation, gender identity or expression, veteran status or any other status protected by law. In making employment decisions, we focus on individual qualifications, demonstrated skills, abilities and achievements, and other factors relevant to the job.	Code of Conduct pg 17
Total percentage of women in the workforce		102-8	38%	37%	38%	38%	We have a 2025 goal to achieve 40% female representation in manager and above roles. To achieve this goal, we are focused on internal talent pipeline development and retention of female employees. Later indicators show the process we are making within our internal pipeline development. The 2020 data set includes our recently acquired employees from Smartrac.	2020 Integrated Report pg 14
Total percentage of female executives			22%	21%	28%	25%	Defined as Vice President level and above. The 2020 data set includes our recently acquired employees from Smartrac.	
Total percentage of women in manager level and above roles			33%	33%	34%	34%	The 2020 data set includes our recently acquired employees from Smartrac.	
Percentage of women in manager level roles						35%	The 2020 data set includes our recently acquired employees from Smartrac.	
Percentage of women in supervisory level roles						39%	The 2020 data set includes our recently acquired employees from Smartrac.	
Percentage of women in professional level roles						52%	The 2020 data set includes our recently acquired employees from Smartrac.	
Percentage of women in clerical and manufacturing roles						36%	The 2020 data set includes our recently acquired employees from Smartrac.	
Gender pay ratios							As part of our efforts toward our people-related 2025 goals, we evaluated our gender pay equity in 2018, 2019 and 2020 and made adjustments to compensation for both male and female employees where needed.	2021 Proxy Statement pg 10

Human Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Diversity and Inclusion								
a. Percentage of gender and racial/ethnic group representation for (1) management and (2) all other employees	CG-MR-330a.1					Ethnic / Racial 22% Managers	22% of our U.S.-based workforce, including employees from our recent acquisition of Smartrac, self report being racially or ethnically diverse, as well as 22% of our U.S.-based management (defined as employees who are assigned to a management job level). We do not report racial or ethnic diversity beyond our U.S. operations as it is not measured and defined consistently across our global footprint. We report global gender diversity earlier in this document, under prior indicators. We do not currently track aggregated monetary loss data.	2020 Integrated Report pg 19
b. Total amount of monetary losses as a result of legal proceedings associated with employment discrimination						22% All other Employees		
Incidents of discrimination and corrective actions taken		406-1					<p>We do not report on specific incidents, but encourage and support teamwork and mutual respect among all employees, and are committed to providing a work environment where all employees are treated with respect, courtesy and dignity.</p> <p>We maintain a “zero tolerance” policy against all forms of harassment involving a protected category under applicable federal, state or local law, including but not limited to sexual harassment, threats in the workplace and violence in the workplace.</p> <p>Violations of this policy result in prompt and appropriate preventive and/or remedial action, up to and including termination of employment.</p> <p>If employees believe this policy has been violated, we encourage them to report the incident to their manager, their Regional Ethics Counsel (or another member of the Law Department), Human Resources, or by contacting our Business Conduct GuideLine, anonymously if they so choose.</p>	Code of Conduct

Human Capital	2020	Discussion	Source
Diversity and Inclusion - EEO-1 (Equal Employment Opportunity)			
Percentage of racially or ethnically diverse Executive/Sr. Level Officials	19%		
Percentage of racially or ethnically diverse First/Mid-Level Officials	20%		
Percentage of racially or ethnically diverse Professionals	24%		
Percentage of racially or ethnically diverse Technicians	15%		
Percentage of racially or ethnically diverse Sales Workers	14%	<p>We are for the first time reporting our 2020 EEO-1 (equal employment opportunity) statistics, which are collected by the U.S. Equal Opportunity Commission to ensure compliance with federal anti-discrimination laws. EEO-1 data reflects only our U.S. workforce. Data reflects the voluntary self-identification by our U.S. employees of racial or ethnic diversity.</p>	<p>2020 Integrated Report pg 19</p>
Percentage of racially or ethnically diverse Administrative Support	18%		
Percentage of racially or ethnically diverse Craft Workers	14%		
Percentage of racially or ethnically diverse Operatives	24%		

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Product Lifecycle Management								
Percentage of raw materials from (1) recycled content, (2) renewable resources, and (3) renewable and recycled content	RT-CP-410a.1					83% FSC Face paper 51% FSC Total paper	In 2020, 83% of the face paper and 51% of total paper is sourced with Forest Stewardship Council (FSC) certifications. We currently track materials with recycled content and renewable resources and both renewable and recycled content, which we aim to publicly disclosure in 2022.	2020 Integrated Report pg 14
Revenue from products that are reusable, recyclable and/or compostable; or products designed for use-phase resource efficiency	RT-CP-410a.2	301-2		LGM: \$1.6B RBIS: \$0.6B	LGM: \$1.9B RBIS: \$0.7B	LGM: \$2.1B RBIS: \$0.7B	Our ClearIntent™ Portfolio consists of products that help our customers and their end users reduce materials consumption; shrink their environmental footprint; and support safety, fairness and human rights. In 2020, we determined that at least 44% and 55% of our LGM and RBIS business' revenues, respectively, were from products that are responsibly sourced, enable recyclability, contain recycled content or use less material without compromising performance. Read more in our Integrated Report.	2020 Integrated Report pg 16 CleanFlake Overview APR Recognition for HDPE Recycling
Discussion of strategies to reduce the environmental impact of packaging throughout its life-cycle	RT-CP-410a.3						Our ClearIntent portfolio is defined products that reduce overall environmental impact, including of products with reduced material weight, that are responsibly sourced, use recycled content and are compatible with environmentally efficient end-of-life processes, such as packaging reuse, compostability and recyclability. We are increasing recyclability with labeling products that enable recyclability of polyethylene terephthalate (PET) and high-density polyethylene (HDPE) containers. In August 2020, we received APR recognition for labeling materials to enable recycling of HDPE containers. We are also introducing recycled content into our labeling facestocks and liners, rPET, rPP and rPE.	APR Recognition for HDPE Recycling
Reductions in energy requirements of products and services		302-5					We develop products with sustainability in mind, from the materials we use, to how they're constructed or recycled at end-of-life. For example, increasing the recycled content of a product or reengineering its composition to reduce the amount of material needed could enable less energy use in its production.	

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Supply Chain Management								
Policy regarding the purchase of wood and/or wood-based products from sustainable sources							We recognize the most pressing social and environmental issues related to wood and paper sourcing, including illegal logging and forest degradation, and aim to use only paper and packaging materials made of wood fiber harvested under conditions that promote social and environmental responsibility and stewardship. Our 2030 commitment is to source 100% of paper fiber from certified sources, focused on a deforestation-free future.	Responsible Paper Procurement Policy
Total wood fiber procured, percentage from certified sources	RT-CP-430a.1						We do not procure wood fibers directly. Our annual reporting and this disclosure document provides information on certified sources of paper, as does our CDP reporting.	CDP Forests Response
Obtained any of the following chain of custody certifications for wood or wood-based products/materials: FSC, PEFC, SFI							We obtain our supplier certifications from FSC, the Program for Endorsement of Forest Certification (PEFC) and Sustainable Forestry Initiative (SFI).	
Percentage of paper sourced with FSC certifications: 1) Face paper 2) Total paper			1)72%	1)76% 2) 45%	1)79% 2)52%	1)83% 2)51%	Our 2025 commitment is that 100% of the paper we purchase will be from certified sources, and that 70% of that will be FSC-certified. In 2020, 83% of the face paper and 51% of total paper is sourced with FSC certifications.	2020 Integrated Report pg 14
Percentage of total volume paper from certified sources	RT-CP-430a.1		84%	87%	89%	92%	In 2021, we increased our sustainability commitments, so that by 2030 we will source 100% certified paper from certified sources, focused on a deforestation-free future. We disclose the percentage of purchased paper that is certified and the total volume of paper purchased in metric tons in our annual CDP reporting.	CDP Forests Response 2020 Integrated Report pg 15

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion
Supply Chain Management							
Total aluminum purchased, percentage of aluminium purchased from certified sources	RT-CP-430a.2				619	770	We procure a small amount of aluminum directly. 2019 data was prior to our Smartrac acquisition; however, the 2020 reported data includes Smartrac. In 2020, 45% of aluminium was procured from sources certified by the Aluminum Stewardship Initiative, or an equivalent standard. Unit of measure is ton.
Number of (1) Tier 1 suppliers	CG-AA-000.A (Activity metric)						Avery Dennison RBIS joined the SAC in 2012 as the first solutions provider in the network. According to SAC criteria, we consider our manufacturing facilities as Tier 1 factories.
Number of (2) suppliers beyond Tier 1		Avery Dennison RBIS does not directly use the Brand Retail Model (BRM) and is not a producer of finished manufactured goods. For 2020, Avery Dennison RBIS operated in 42 manufacturing, distribution or fast response unit locations, as well as using 298 outsource suppliers.					

2019 data points for the following indicators have been updated in this document from prior disclosures:

- Percentage of aluminium from certified sources was previously stated as 8%

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Supply Chain Management								
Sustainable Supplier Guidelines		308-1 414-1					<p>Our Supplier Standards describe standards with which our suppliers are required to comply on matters such as working conditions, labor standards, anti-corruption, and similar legal and ethical requirements. These standards underscore our commitment to integrity in business activities, abiding by government laws and regulations, providing employees with a safe and healthy working environment, treating employees with dignity and respect, and promoting sustainable practices to help in protecting and preserving the environment. Compliance with these standards is an ongoing condition of doing business with our company.</p> <p>Additionally, our RBIS business provides suppliers with Social Compliance Supplementary Standards.</p> <p>Both documents address key environmental and social issues in our supply chain. Suppliers and subcontractors must comply with all applicable environmental laws and ensure that other relevant requirements are achieved. Suppliers, contractors and subcontractors must take proactive measures to protect, and minimize impacts to, the environment.</p> <p>Both documents also communicate our expectations regarding compensation, working hours, forced labor, child labor, discrimination and human rights, and freedom of association.</p>	<p>Supplier Standards</p> <p>Social Compliance Supplemental Standards</p>
Evaluation of suppliers on social and environmental risks and performance		408-1 409-1					<p>Within our LGM and IHM businesses, we use EcoVadis to conduct annual social, environmental and ethical performance of their top suppliers. In 2020, we evaluated the performance of 85% of their direct spend. The assessment produces an overall rating for each supplier, as well as a performance rating within the categories of environmental, labor, fair business and supply chain practices. The report also highlights areas for improvement and includes news alerts with any emerging controversies.</p> <p>In RBIS, all new outsource partners are audited prior to any orders being placed. These audits are conducted by third-party organizations and focus on a number of social, environmental, and health and safety criteria. Each supplier receives an audit score and must develop a corrective action plan for improvement. This audit process replicates the standards and protocols of many external benchmarks such as SEDEX and BCSI, and covers many areas, including the social and environmental controls and systems at the supplier. For a supplier to be onboarded, they need to pass this audit process.</p>	

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion
Labor Impacts in the Supply Chain							
Percentage of (1) Tier 1 supplier facilities that have been audited to a labor code of conduct	CG-AA-430b.1				1) 90%	1) 83%	During 2020, our RBIS reportable segment completed 144 social audits across our own manufacturing facilities and 259 across those of our outsource partners. These audits were all conducted by third-party auditors.
(2) Percentage of supplier facilities beyond Tier 1 that have been audited to a labor code of conduct					2) 46%	2) 66%	
(3) Percentage of total audits conducted by a third-party auditor					3) 100%	3) 100%	
Priority non-conformance rate and associated corrective action rate for suppliers' labor code of conducted audits.	CG-AA-430b.2						In 2020, Avery Dennison RBIS Apparel undertook 403 social audits, including 144 at our owned facilities (defined as Tier 1) and 259 at outsource partner facilities.
							An external expert completes each audit, and findings are classified according to their risk and material impact. These classifications range from zero tolerance issues, immediate action and critical action. Each finding generates a corrective action plan. All corrective action plans are time bound with clear owners.
							We have implemented a governance process to oversee the closure of all actions within the time period required by corrective action plans.
Description of the greatest (1) labor and (2) environmental, health, and safety risks in the supply chain	CG-AA-430b.3						Through our supplier audits, we've found our greatest risks are related to working hours, occupational health and safety, and documentation regarding environmental assessments and certifications. When we find violations, they are promptly addressed through our remediation process.

Business Model and Innovation	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion
Raw Material Sourcing							
Amount of production, by substrate	RT-CP-000.A (activity metric)		637	660	581	590	Production of film materials in million square meters (MSQM)
Percentage of production as: paper/wood and plastic	RT-CP-000.B (activity metric)						For our combined LGM and IHM reportable segments, raw material costs represented ~50% of net sales in 2020. ~45% of that spend was tied to speciality paper-based materials, ~25-30% was tied to plastic films and resins for films that we manufacture ourselves, and the majority of the balance was tied to adhesives and other chemicals.
Percentage of products by revenue that contain GMOs	RT-CH-410c.1						We believe that our products currently do not contain any genetically modified organisms (GMOs), but we plan to assess this in our next annual supplier compliance survey in 2021. If we identify any use of GMOs, we will implement the necessary systems to track and report this in the future.
Description of environmental and social risks associated with sourcing priority raw materials	CG-AA-440a.1						While we are a member of the SAC, we do not utilize its HIGG BRM, as it is not relevant for the products we produce. We have strong raw material sourcing guidelines. These standards include publicly posted supplier standards and clear sourcing guidelines, including our Responsible Paper Procurement Policy. Avery Dennison RBIS Apparel has 76% of its manufacturing, distribution or fast response facilities FSC-certified. For yarn-based materials, Avery Dennison RBIS Apparel prefers Global Recycle Standard (GRS) yarn, and has certified 36% of manufacturing, distribution or fast response units.
Percentage of raw materials third-party certified to an environmental and/or social sustainability standard, by standard	CG-AA-440a.2						Avery Dennison RBIS Apparel has a strong commitment to make sustainable products. Within our most commonly used raw materials, certifications such as FSC, GRS and Oeko-tex are commonplace. This category includes 76% of our manufacturing, distribution or fast response facilities with FSC certification, 36% with GRS certification and 50% with Oeko-tex certification.

Social Capital	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Community Relations								
Discussion of engagement processes to manage risks and opportunities associated with community interests	RT-CH-210a.1	413-1					We have a long history of helping to strengthen the communities in which we do business through volunteerism and financial support of community-based organizations. Lending our resources to help communities meet some of their most urgent challenges is a natural extension of our values and part of our responsibility as a member of communities around the world. We make most of our community investments through the Avery Dennison Foundation, adhering to strict financial and governance guidelines. Employees across our geographic regions and business units also organize additional community-giving efforts. In all our giving, we focus on efforts to drive measurable and meaningful change.	Avery Dennison Foundation Community Impact web page
Annual Giving			\$1.65M	\$1.86M	\$1.44M	\$3.53M	Annual Giving is measured in U.S. dollars (\$). Increased Foundation spending is expected to continue owing to a Q4 2020 \$10M donation from our company to the Avery Dennison Foundation. Spending in 2020 was primarily related to supporting communities and organisations' response to the global COVID-19 pandemic.	2020 Integrated Report pg 8, 20
Workforce								
Number of employees	RT-CP-000.C (activity metric)		30,276	32,014	32,738	32,086	The 2020 employee number includes our recently acquired employees from Smartrac.	
Training Policy		404-1					<p>To achieve our vision in a way that reflects our company's values, our goal is to employ the best people who reflect a diverse workforce at all levels and provide them with opportunities for learning and career growth.</p> <p>Accordingly, one of our objectives is to provide an environment of professionalism, growth and opportunity, facilitate career and personal development, and continually review and develop programs aimed at optimizing productivity at all levels.</p> <p>At a minimum, all employees receive the functional training needed to perform their duties as well as Compliance and Values & Ethics Trainings. There are also a number of resources available to our employees globally to facilitate their career and personal development:</p> <ul style="list-style-type: none"> • Global Performance Management process. • Career Development/Learning Centers, which house tools for career development and training. • Onboarding System to support a structured onboarding of new employees. 	

Annual Giving replaces the previously disclosed indicator of Community Spending.

Leadership and Governance	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Workforce								
Employee Training		404-1					<p>Our philosophy linked to development and training follows the 70/20/10 approach: 70% of learning happens on the job; 20% of learning comes from exposure to and interaction with others; and 10% of learning happens formally.</p> <p>Learning Advisor, our global learning platform, supports our employees to follow this approach for their personal and career development and to select from different types of learning, including formal trainings, self-study, learn by doing and learn from others.</p> <p>Additionally, there are local guidelines and policies in place at the majority of our facilities, as well as regional initiatives and programs, dedicated to supporting the development of our employees.</p>	
Percentage of favorable responses on employee engagement survey			81%	81%	82%	82%	<p>We conduct an annual enterprise-wide Employee Engagement Survey. Percent is derived from proportion of respondents who stated agree or strongly agree on a five-point Likert scale.</p> <p>The 2020 data includes our recently acquired employees from Smartrac.</p>	2020 Integrated Report pg 14
Employee turnover (voluntary / total)			9.6% 18.1%	10.1% 17.1%	10.2% 17.1%	8.9% 18.3%	<p>The 2020 data includes our recently acquired employees from Smartrac.</p>	
Data Protection Policy							<p>We mainly process personal data about our employees and business contact data relating to our customers, suppliers and other individuals with whom we have a business relationship. We also gather personal information through our website, which is disclosed in our Website Privacy Notice. The information that we process may include limited amounts of sensitive personal data, and we exercise due diligence to protect the personal information that we hold in accordance with law.</p>	Website Privacy Notice GDPR FAQ
Employee turnover (voluntary / total)			9.6% 18.1%	10.1% 17.1%	10.2% 17.1%	8.9% 18.3%	<p>The 2020 data includes our recently acquired employees from Smartrac.</p>	

Leadership and Governance	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Privacy								
Data Protection Policy							We mainly process personal data about our employees and business contact data relating to our customers, suppliers and other individuals with whom we have a business relationship. We also gather personal information through our website, which is disclosed in our Website Privacy Notice. The information that we process may include limited amounts of sensitive personal data, and we exercise due diligence to protect the personal information that we hold in accordance with law.	Website Privacy Notice GDPR FAQ
Business Ethics								
Business Ethics Policy							Our Code of Conduct is available in 33 languages and covers anti-corruption and anti-bribery.	Code of Conduct
Percentage of the total workforce who acknowledge the Code of Conduct in writing			100%	100%	100%	100%		
Employee Protection / Whistleblower Policy							Our Code of Conduct contains language that covers employee protection, reporting concerns and non-retaliation.	Code of Conduct
Ethics policy or Code of Conduct extends to include suppliers							By extension, our suppliers are part of our culture, so we do our best to hold them to the same ethical standards we follow. They are bound by our Global Supplier Standards, which detail the best practices and ethical behavior we expect from our suppliers.	Code of Conduct pg 30
Highest level of executive oversight for anti-bribery or anti-corruption							The Governance Committee of our Board of Directors oversees matters such as environmental sustainability and community investment and assists the Board to survey, monitor and provide counsel on the business relationships, affiliations and financial transactions of directors, officers and other key employees related to potential conflicts or our Company’s Legal and Ethical Conduct Policy.	
Anti-corruption training is provided to employees		205-2					Topics include: Antitrust Compliance, Code of Conduct, Conflict of Interest, Global Export Controls, Preventing Workplace Violence and Fraud Awareness for Managers.	

Leadership and Governance	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Business Ethics								
Percentage of computer-based workforce who completed e-learning courses on business ethics issues			90%	94%	88%	~94%		
Percentage of all facilities for which an internal audit/risk assessment concerning business ethics issues has been conducted					96%	97%	Internal Audit conducts an annual, enterprise-wide values and ethics risk assessment.	
Political Spending								
Information on corporate funds for political advocacy (lobbying, campaign contributions, money to tax-exempt groups or trade associations)							We do not contribute corporate funds for political advocacy.	
Governance of CSR								
Sustainability Committee							Our Sustainability Council is comprised of a group of functional and business leaders to help drive broad accountability and accelerate our progress. The Council meets bi-monthly and updates our executive leadership team quarterly. The Council has the following work streams to help focus its efforts, each of which is led by an internal leader from one of our businesses: Operations, Products and Innovation, and Social Impact and Transparency.	CDP Climate - Section C1.2a 2021 Proxy Statement pg 21
Board Committee with Responsibility for Sustainability							Board oversight of environmental sustainability is primarily conducted by the Governance Committee, which receives a report from management at least once a year. In addition, our full Board hears from our business leaders on their sustainability initiatives during its regular review of our business strategies. Board oversight over social sustainability is conducted primarily through the Compensation Committee, which regularly reviews our diversity and inclusion progress and discusses other matters related to human capital management.	CDP Climate - Section C1.2a 2021 Proxy Statement pg 21

Leadership and Governance	SASB Reference	GRI Reference	2017	2018	2019	2020	Discussion	Source
Governance of CSR								
Executive Director with Responsibility for Sustainability							With strategic guidance and direction provided by Mitch Butier, our Chairman, President and CEO, responsibility over ensuring that we continue to make meaningful progress towards achieving our 2025 sustainability goals currently resides with Deon Stander, Vice President and General Manager of our RBIS business.	CDP Climate - Section C1.2a 2021 Proxy Statement pg 21
Executive Compensation Linked to ESG							Our CEO's performance evaluation includes an objective tied to our progress on our 2025 sustainability goals.	CDP Climate - Section C1.1a
Employee Sustainability Training							Our employees receive awareness trainings and communications about our sustainability commitments annually during "Sustainable September." We train all RBIS leaders in site operations, human resources and procurement as part of our Integrated Compliance Assurance Program. Courses on the Essentials of Sustainable Packaging from the Sustainable Packaging Coalition are offered to LGM employees.	
Board Diversity								
Percentage of Women on the Board	405-1		18%	18%	18%	20%	22% of our 2021 Board nominees are women.	
Percentage of Racial/Ethnic Minorities on the Board			18%	18%	18%	30%	33% of our 2021 Board nominees self identify as from racial or ethnic minorities.	2021 Proxy Statement pg 11
Board of Directors Age Range			46-69 years	47-70 years	48-71 years	49-72 years		
Size of the Board			11	11	11	10	We have nine 2021 Board nominees.	



**AVERY
DENNISON**