

Avery Dennison Human Rights Policy

September 2020

1. Respect for Human Rights

Avery Dennison has a fundamental respect for human rights. We are committed to treating all of our employees, and helping ensure employees within our supply chain are treated, with dignity and respect, and to serving as a force for good in the communities in which we operate.

We are committed to respecting and promoting human rights. This policy is guided by human rights principles, including those contained within the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, and the United Nations Global Compact.

2. Purpose and Scope

Our global Human Rights Policy reflects our commitment to basic human rights as a core component of the way we do business. This policy supports our company's values and Code of Conduct by guiding our businesses and employees toward upholding the fundamental principles and requirements of basic human rights in the workplace. This policy supports our businesses in identifying actual and potential human rights risks, then developing and implementing actions to create greater responsibility, and it creates a mechanism for monitoring and reporting. This policy covers our company-owned facilities, as well as the facilities owned by certain third parties with which we do business.

We expect our supply chain stakeholders to embrace the guidance in this policy, and adhere strictly to our [supplier standards](#). Suppliers are defined as suppliers, contractors and subcontractors.

3. Governance

This policy was approved by senior management, including our CEO, and made available to our employees and other stakeholders via our company website.

We commit to conducting annual Code of Conduct training for our employees, which continually reinforces our reporting mechanisms and anti-retaliation policy for good faith reporting of potential violations of the Code or applicable law.

4. Risk Management and Remediation

As a global manufacturing company, we recognize that certain countries represent larger risks. Therefore, part of the policy guidance is to undertake routine risk analysis by country to identify human rights risks.

Within our Retail Branding and Information Solutions division, third party audits of our company-owned facilities and Tier 1 subcontractor facilities are conducted on an ongoing basis. These audits are focused on fundamental human rights, with the audit criteria [publicly available](#). We commit to expanding human rights auditing across all company-owned facilities in high risk countries starting in 2021.

In line with the UN frameworks, we are committed to providing effective remedies where we have inadvertently caused or contributed to adverse human rights impacts. Where we find impacts directly linked to our business relationships, we will use our influence to encourage our suppliers and business partners to take remedial action.

5. Definitions and Commitments

Child labor

We forbid the use of child labor within our supply chain. The term “child” refers to a person younger than 15 or the local legal minimum age for employment, whichever is higher.

Forced labor

We forbid the use of forced labor within our supply chain. Forced labor includes prison labor, indentured labor or debt bondage.

We require our supply chain partners to comply with the requirements of the UK Modern Slavery Act.

Freedom of association and collective bargaining

We respect the legal right of workers to freely associate, form and join organizations of their choice, and bargain collectively.

We recognize that our employees are our greatest competitive advantage, and we commit to ensuring that all employee voices are represented, with or without local trade unions.

Discrimination

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 solely on individual qualifications, demonstrated skills, abilities and achievements, and other factors relevant to the job.

Compensation

We, and our suppliers, shall compensate all employees in compliance with all applicable local laws pertaining to wages, including overtime, and benefits. We strictly prohibit the deduction from pay for disciplinary infractions, reporting unfair or illegal practices or other “whistle blowing” activities.

Commitment to health and safety

The health and safety of our employees, and the employees in our supply chain, is paramount to Avery Dennison. We are committed to ensuring that employees are provided with a safe and healthy work environment and that our facilities are in compliance with all applicable health and safety laws.

6. Monitoring and Reporting

We have strong various available reporting mechanisms and a strong anti-retaliation policy. Employees and third parties, including employees within our supply chain, can report incidents or concerns through the [Business Conduct GuideLine](#), anonymously if they so choose, without fear of retaliation.

We report our actions and engagements on human rights in our annual integrated report. We make public on our website our values, principles, policies and practices that this policy is intended to reinforce.