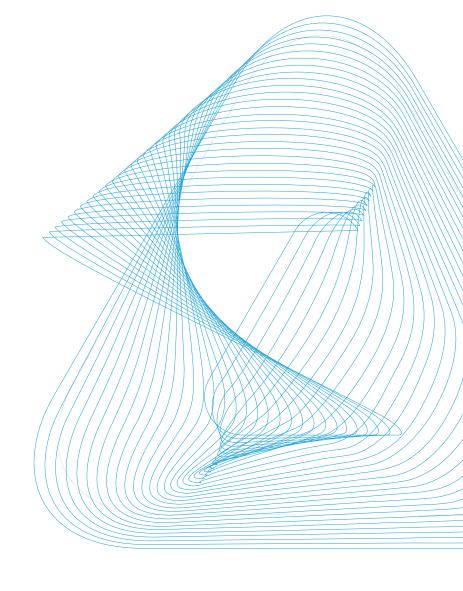
# ESG Download

**Avery Dennison ESG Reporting** 

March 2022





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), represented 65% of our total 2021 sales. Our label materials enhance shelf appeal for brands, inform shoppers and improve operational supply chain efficiency. Our Graphics Solutions business is a global leader in self-adhesive and specialty media for professional graphics providers and designers.

Our Retail Branding and Information Solutions (RBIS) business represented 26% of our total 2021 sales. RBIS provides physical and digital labeling solutions that allow customers in the global apparel, food and general retail markets to optimize their on-product branding and engagement with consumers and enables item visibility and traceability from source to end-of-life. RBIS solutions include variable data labels, radio frequency identification (RFID) solutions, shelf-edge labels, tickets, tags, woven and fabric labels, heat transfers, software, printers and consumables.

Our Industrial and Healthcare Materials (IHM) businesses, which represented 9% of our total 2021 sales, provide highly engineered tape, adhesive and fastener solutions for industrial, automotive, building and construction, personal care and healthcare markets worldwide. We enable customers to enhance their products' performance and make their manufacturing processes more efficient.

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

Further discussion of our sustainability initiatives and progress against our sustainability goals can be found in our 2021 Integrated Report.

The sustainability data provided in this download is unaudited.



#### Scope

Unless specifically stated, this download covers acquired businesses owned for a full calendar year. Acquisitions made after the close of the fiscal year are excluded.

As a result of data unavailability, 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.

#### **Definitions**

**Facility:** We use the term "facility" to describe any location that we own or lease. This designation includes all locations, including manufacturing, converting/distribution centers, research and development, warehouses, fast response units and office locations.

**Manufacturing Facility:** We use the term "manufacturing facility" to describe any location in which we manufacture products. This designation excludes converting/distribution centers, research and development, warehouses, fast response units and offices locations.



## Avery Dennison 2020 Materiality Matrix

### March 2022



assessment is currently under

Communities

Employees

Governance

Products and Services

☐ Supply Chain

Sustainable Processes

Importance to Avery Dennison

2025 Goals		Baseline (2015)	2021 Results
*	70% of revenues from sustainability-driven products		<b>50%</b> LGM <b>55%</b> RBIS
	3% absolute greenhouse gas (GHG) emissions reduction every year (26% cumulative by 2025)*		<b>48%</b> cumulative GHG emissions reduction
	100% certified paper 70% Forest Stewardship Council (FSC)-certified face paper	<b>45%</b> FSC-certified	91% certified 81% FSC-certified face paper
	95% landfill-free 75% waste recycled	90% landfill-free 55% recycled	94% landfill-free† 67% recycled†
	70% of films we buy conform to, or enable end products to conform to, our environmental and social guiding principles 70% of chemicals we buy conform to, or enable end products to conform to, our environmental and social guiding principles		97% of films 96% of chemicals
	40% women in manager level and above	32%	35%
	Maintain world-class safety and employee engagement scores	<ul><li>0.31 Recordable Incident Rate (RIR)</li><li>80% engagement</li></ul>	<b>0.21</b> RIR <b>82%</b> engagement
	Publicly commit to goals/report progress		

<sup>\*</sup>GHG baseline and actual data are from Q3 YTD comparisons (Q3 2015 to Q3 2021).

<sup>†2021</sup> waste and recycling data are from Q3 YTD.

2030 Goals		Baseline (2015)	2021 Results
→ V	Satisfy the recycling, composting or reuse requirements of all single-use consumer packaging and apparel with our products and solutions.		
<b>*</b>	<b>RBIS</b> 100% of our core product categories (printed fabric labels, woven labels, paper, interior heat-transfer labels, packaging and RFID) will meet our third-party verified Sustainable ADvantage™ standard.		<b>64%</b> (RBIS Apparel only)
Deliver innovations that advance the circular economy	LGM 100% of our standard label products will contain recycled or renewable content. All of our regions will have labels that enable circularity of plastics.		<b>50%</b> (Percentage is of products that meet our Sustainable ADvantage <sup>TM</sup> criteria)
	Reduce our Scope 1 and 2 GHG emissions by 70% from our 2015 baseline. Work with our supply chain to reduce our 2018 baseline Scope 3 GHG emissions by 30%, with an ambition of net zero by 2050.		<b>48%</b> Scope 1 and 2*  Scope 3 tracking under development
Reduce our	Source 100% of paper fiber from certified sources focused on a deforestation-free future.	<b>45%</b> FSC-certified	<b>91%</b> certified
environmental impact in our operations and supply chain	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.	90% landfill-free 55% recycled	<b>94%</b> landfill-free <sup>†</sup> <b>67%</b> recycled <sup>†</sup>
	Deliver a 15% increase in water efficiency at our sites that are located in high or extremely high risk countries as identified in the World Resources Institute Aqueduct Tool.		Tracking in development
Make a positive	Foster an engaged team and an inclusive workplace.  Inclusion index: 85%  Employee engagement: 82%  Females in manager level or above positions: 40%  Safety: 0.2 Recordable Incident Rate (RIR)	 80% 32% 0.31 RIR	81% 82% 35% 0.21 RIR
social impact by enhancing the livelihood of our people and communities	Support the participation of our employees in Avery Dennison Foundation grants and foster the well-being of the communities in which we and our supply chain operate.		74% of countries in which we operate received a grant

	Discussion	Source
Disclosures		
SASB	Our company is categorized as Containers and Packaging under the SICS classification system used by SASB. In this ESG Download, we also included SASB indicator codes for the Apparel, Accessories & 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 reporting GRI indexing in our Integrated Report to reporting in this ESG Download.	
CDP	We have responded to CDP Climate since 2010, and CDP Water and CDP Forests since 2015 and 2016, respectively. For 2020, the most recently rated year, we were rated B for Forests, 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. In October 2021, our carbon emission reduction targets were approved by the Science Based Target Initiative (SBTi).	2030 Targets
UN Global Compact	In November 2020, we joined the UN Global Compact and first disclosed our progress on our annual commitments 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	Our RBIS business has 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 of RBIS manufacturing facilities. These audits are accessible in the HIGG index available to SAC members.	HIGG Index

<sup>\*</sup>We continue to evaluate additional standards and frameworks as relevant.

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Climate Change							
Climate Change Policy						Sustainability is one of our company values as well as one of our core strategies. As a responsible corporate citizen, we are committed to reducing GHG emissions throughout our operations and value chain. In 2021, we received approval from the SBTi for our reduction targets, with our Scopes 1 and 2 targets in line with reductions required to keep warming to no more than 1.5°C. We also launched our 2030 sustainability goals, which include Scope 3 carbon reduction targets and an ambition to have net-zero emissions by 2050.	Climate Policy ESG Website
Board oversight of climate strategy						Board oversight over environmental sustainability is primarily conducted by the Governance Committee, which receives a report from management on sustainability topics at least once a year. The Committee is responsible for reviewing and providing oversight over key environmental sustainability initiatives, policies and programs, including our climate strategy.	Climate Policy  CDP Climate Response (Section C1.1)  Proxy Statement
Climate Change Strategy						Our 2025 goal is to achieve at least a 3% absolute reduction year over year, in line with the 3% Solution developed by the World Wildlife Foundation. In 2021, we announced our 2030 goals, which include a 70% absolute reduction against our 2015 baseline for Scope 1 and 2, and a 30% absolute Scope 3 reduction from purchased goods and services and end-of-life treatment of sold products against a 2018 baseline year. Our ambition is to have net-zero emissions by 2050.	2030 Targets

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Climate Change							
Climate change-related risks and opportunities						Through our risk identification process, we evaluate climate risks as standalone risks and also as part of broader risks, such as the macroeconomic environment. One of the risks we consider as having a substantive impact is the risk of climate change and sustainability. Our process for identifying, assessing and responding to climate-related risks and opportunities is integrated into our Enterprise Risk Management (ERM) process. The teams leading our businesses have incorporated ERM into developing and executing their strategies, assessing the risks impacting their businesses, and identifying and implementing appropriate mitigation strategies on an ongoing basis. We are also currently undertaking a full update of our ESG materiality assessment.	CDP Climate Response (Section C3.3) Proxy Statement
Incentives for management around climate change						Our CEO's annual incentive award is in part based on the Talent and Compensation Committee evaluation of his performance against his predetermined strategic objectives for the year. One of these objectives is making progress toward our 2025 sustainability goals, including reducing GHG emissions. More information on incentive-based pay for all Named Executive Officers (NEOs) is available in our 2022 proxy statement.	CDP Climate Response (Section C1.3) Proxy Statement
Internal price of carbon						We are evaluating a price on carbon but have not instituted one at this time.	CDP Climate Response (Section C11.3)

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source				
Greenhouse Gas Emissions											
Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations  Total GHG emissions (Scope 1+2)  Scope 1 Scope 2	RT-CP-110a.1	305-1 305-2	474K 196K 278K	402K 192K 210K	269K 142K 127K	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 and 2030 GHG emission reduction targets. GHG emissions are measured in metric tons of carbon dioxide equivalent (tCO <sub>2</sub> e).  We do not operate under any emissions limiting regulations at this time.  Our 2020 location-based Scope 2 emissions are available in our 2021 CDP response. CDP data for 2021 will be available once released by CDP in 2022.  2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum). 2021 data is represented through Q3. Q4 data will be incorporated when available.	CDP Climate Response (Section C6) Climate Policy				
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					In order to meet our ambitious 2030 sustainability goals (see page 6), we will continue to drive efficiency improvements in our processes as well as innovate to develop products that require less energy-intensive processes for production. We will continue to transition our power purchasing toward green energy and seek out innovative alternative energy sources, such as our upcoming concentrated solar facility in Turnhout, Belgium. We continue to perform well against our 2025 sustainability goals (see page 5).	CDP Climate Response (Section C4) Climate Policy Integrated Report				

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Greenhouse Gas Emi	ssions						
Emission reduction activities  Air Quality						The majority of our emission reduction activities come from renewable energy projects, which are applied across our global manufacturing footprint. Emission reductions have been achieved through a range 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. Examples of our emission reduction activities are reported to CDP.  In June 2020, our US virtual wind PPA with Plum Creek Wind came to fruition, and our off-take in 2020 was 62,224 megawatt hours (MWh). In 2021, its first full year of operation, our off-take from this 82-turbine, 230-MW project yielded 115,754 MWh of renewable power.	Climate Policy  CDP Climate Response (Section C4.3a)
Air emissions of the following pollutants:  (1) NOx (excluding N <sub>2</sub> O)  (2) SOx  (3) VOCs	RT-CP-120a.1	305-7				Of our 228 facilities as of December 31, 2021 only 60, or 26%, produced air emissions such as nitrogen oxides (NOx), sulphur oxides (SOx), volatile organic compounds (VOCs) or particulate matter (PM).  Air emissions such as NOx are measured based on local permit requirements. The resulting data is site specific and not available at an enterprise level at this time.  VOC emissions are tracked at the site level. Our VOC data is not available at the enterprise level at this time.	

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Energy Management							
Total energy consumed	RT-CP-130a.1	302-1	6,003K	5,952K	4,290K	Total energy consumption is measured in gigajoules (GJ). 2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum). 2021 data is through Q3. Q4 data will be incorporated when available.	CDP Climate Response (Section C8.2a)
Percentage grid electricity	RT-CP-130a.1	302-2	36%	36%	42%	During 2021, 42% of our total energy consumption came from grid electricity. 2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum). 2021 data is through Q3. Q4 data will be incorporated when available.	CDP Climate Response (Section C8.2a)
Percentage renewable	RT-CP-130a.1	302-3	14%	19%	22%	Our use of renewable energy is increasing due to our US wind virtual power purchase agreement (vPPA) that began in June 24, 2020. In 2021, this vPPA generated 115,754 MWh toward our operations. 2021 data is through Q3. Q4 data will be incorporated when available.	CDP Climate Response (Section C8.2a)
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 of our facilities operate windmills and solar panels that generate electricity for ourselves and the grid.	
Activities to reduce energy consumption		302-4				Within our overall strategy to reduce GHG emissions, we have a specific strategy and focus on initiatives and projects to address energy efficiency. To date, our facilities have completed 48 projects providing an estimated annual energy reduction of 15,066 MWh per year.	
						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.	
Energy/Renewable energy targets						As of September 30, 2021, our LGM business reduced the energy intensity of its manufacturing facilities by 23% compared to its 2015 baseline, an average reduction of 4% per year. Over the same period, our RBIS Apparel business reduced energy intensity by 30%, an average reduction of 5% per year. We are committed to reducing energy intensity in all of our facilities, consistent with our overall climate strategy.	

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Water Management							
(1) Total water withdrawn						Water withdrawal is measured in millions of gallons. We began collecting water consumption data in 2021 and plan to first report 2022 data in 2023. Water usage is relatively low in our direct operations; we see opportunities for larger water-saving impacts in our supply chain.	
(2) Total water consumed						The World Resources Institute (WRI) Aqueduct Tool allows us to determine by geography how many of our sites are in areas of water stress. We assess our sites annually and analyze the data based on	
(3) Percentage of each in regions with High or Extremely High Baseline Water Stress	RT-CP-140a.1	303-1	1) 540	1) 445 3) 48%	1) 321 3) 39%	risk level (Extremely High, High, Medium High, Medium Low, Low). A slight change in scope (excluding non-operational sites, combining sites that share a campus, etc.) contributed to the decrease in percentage from 2020 to 2021. This updated methodology will continue moving forward and be updated annually to reflect any closures or acquisitions.	Water Policy
						2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum). 2021 data is through Q3. Q4 data will be incorporated when available.	
Description of water management risks and	DT 0D 110 0					We perform an annual water assessment using the WRI Aqueduct Tool. Based on recent assessments, any site falling into High or Extremely High risk becomes part of our 15% water efficiency target that is part of our 2030 sustainability goals. We are currently evaluating the impact our direct operations may have on the water basins in those areas, as well as the risk(s) to our business of utilizing water resources in these regions.	
discussion of strategies and practices to mitigate those risks	RT-CP-140a.2					Starting in 2021, we began requesting water policy and practice information through EcoVadis from suppliers representing the top 80% of LGM direct spend. At our own sites, we have been working to implement more accurate and specific tracking to enable data-driven water efficiency improvements in the future. We established our water-related target and goal to support our industry's efforts to reduce water-related impacts and risks in our value chain. The most relevant water-related risks to our business exist upstream in our supply chain, where water use is more significant.	Water Policy
Number of incidents of non-compliance associated with water quality permits, standards and regulations	RT-CP-140a.3		1	0	1	In 2021, we had one incident of exceeding our discharge permit, which occurred at our Mill Hall, Pennsylvania facility. We exceeded the permit limit for molybdenum. The limit was 0.17 mg/liter, and our water discharge was found to contain 0.19 mg/liter. The sources were removed through product substitution. Subsequent sampling demonstrates consistent compliance with the molybdenum permit limit.	
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.	

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source			
Hazardous Waste Management										
Hazardous waste						We have publicly committed to reducing waste as part of our sustainability goals. Our strategy and targets to reduce hazardous waste are included in our broader waste reduction plan.	Waste Reduction			
Amount of hazardous waste generated; percentage recycled	RT-CP-150a.1	306-2	18K 23%	16K 23%	13K 21%	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.  Chemical waste and contaminated materials must be handled in accordance with Global Standard 3.01-Waste Management.  Hazardous waste is measured in metric tons (t) and by percentage recycled.  2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum).  2021 data is through Q3. Q4 data will be incorporated when available.	Waste Reduction			

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Waste Management							
Percentage of waste diverted from landfill		306-3	94%	94%	94%		
Percentage of waste sent to landfills		306-2	5.7%	5.7%	5.6%	<ul> <li>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.</li> <li>2021 data excludes recent acquisitions (Vestcom, ACPO, JCD and ZippyYum).</li> <li>2021 data is through Q3. Q4 data will be incorporated when available.</li> </ul>	
Percentage of waste recycled			65%	66%	66%		
Provide data on significant spills			24	15	16	Defined as release to the environment (air, water, earth) where the quantity (a) exceeds 5 gallons/20 liters, (b) exceeds a Reportable Quantity in the US or (c) which requires notification to a governing agency (excluding water). Most of these spills occurred inside a building and were contained and cleaned with little or no impact to the environment.	

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Biodiversity							
Approach to evaluating and managing biodiversity concerns		304				Our Responsible Paper Sourcing Policy addresses the measures we take to minimize wood fiber sourced from potentially controversial locations, including those with significant ecological value. We are committed to increasing our use of wood/fiber that has been certified by a credible third-party forest certification scheme (for virgin and recycled) with preference for FSC-certified material where market conditions and good business practices allow. Our 2022 assessment with Rainforest Alliance is under way.  In our CDP Forest disclosures, we provide further information on our approach to biodiversity.	Responsible Paper Procurement Policy  CDP Forest Response
Environmental Mana	agement Sys	tems					
Percentage of operations certified				24%	25%	As of December 31, 2021, 35 of our 228 facilities had ISO 14001 Certification. Of these 228 facilities, 142 were operational facilities, with 25% of these facilities having ISO 14001 Certification.	
Number of locations with Environmental Audits			17 Corporate 18 HIGG FEM	4 Corporate 19 HIGG FEM	8 Corporate 18 HIGG FEM	We regularly audit our facilities to ensure they comply with environmental, health and safety requirements. These audits are undertaken in two primary ways. One is our Corporate EHS audits, which are led by our specialist teams. In our RBIS Apparel facilities, we undergo HIGG FEM audits, which are led by external auditors. The low numbers for Corporate audits in 2020 and 2021 were a result of COVID-19 restrictions that limited access to sites.	

Environment	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Environmental Impa	icts in the Supp	ly 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%	1) 100%	Our RBIS business joined the SAC in 2012 as the first solutions provider in the network. Based on SAC criteria, we consider our manufacturing facilities to be Tier 1 factories.  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. We require suppliers to comply with the M-RSL requirement, which restricts harmful substances and chemicals used in our manufacturing facilities. We do not currently track wastewater compliance of suppliers.  We monitor wastewater quality at owned manufacturing facilities. As of December 31, 2021, 100% of our manufacturing facilities complied 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 the Institute of Public and Environmental Affairs (IPE). In 2021, these three manufacturing facilities produced approximately 45% of RBIS Apparel's global product.	RBIS RSL
Percentage of (1) Tier 1 supplier facilities, and (2) supplier facilities beyond Tier 1 that have completed the Sustainable Apparel Coalition's HIGG FEM assessment or an equivalent environmental data assessment.	CG-AA-430a.2			1) 61%	1) 64%	In 2021, RBIS Apparel conducted 18 HIGG FEM audits, which validated 2020 data, covering 64% of its manufacturing facilities.  RBIS is piloting the use of HIGG FEM audits into the supply chain with key outsource partners. There were 19 key outsource partners that completed HIGG FEM self-assessments in 2021.	

Social Capital	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Human Rights							
Human Rights Policy						We address human rights concerns regarding our operations and supply chain through our corporate policies, including the Avery Dennison Human Rights Policy. Within our RBIS business, all manufacturing locations and Tier 1 suppliers are regularly audited against our social standards. In 2021, the 195 social audits of our owned locations covered 22,145 employees. We also conducted 284 social audits of our suppliers in 2021.  In 2021, we achieved full membership of the Ethical Trading Initiative, and, in early 2022, we were recognized as a great place to work by the Human Rights Campaign, achieving a perfect score on their corporate equality index.	Human Rights Policy
Human Rights or other policy covers community consultations and indigenous rights						In 2021, we published our Responsible Sourcing Policy, which includes requirements related to labor rights as well as prohibitions on endangered animal and plant material, and responsible forestry and animal practices.  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.  We have been closely following the requirements of the Uyghur Forced Labor Prevention Act (UFLPA). We assessed risk and completed due diligence where we believed it to be applicable.	Responsible Paper Procurement Policy RBIS Responsible Sourcing Policy
Policy Against Child Labor						We do not use, and we prohibit our suppliers from using, 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.	Supplier Standards  Human Rights Policy

Social Capital	SASB Reference	GRI Reference	2019	2020	2021	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					We implemented restricted substance list (RSL) programs both company-wide and tailored to our businesses. These programs list chemicals of concern identified by governments, 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 their use in new products.  Our RBIS and Avery Dennison Smartrac businesses maintain their own RSL programs, which restrict many more chemicals of concern relevant to the apparel and footwear industry and RFID-enabled products in both existing and new products. For LGM and IHM, we use our company-wide RSL, which identifies banned, restricted and watch-list substances. Our banned substances are those which are banned by law or regulation somewhere in the world, while our restricted list allows use in some instances while not in others. Our 2025 sustainability goal of 100% compliance with the RSL will mean no use of any substance on the banned substance list, even in jurisdictions where it is still allowed.
Discussion of processes to maintain compliance with restricted substance regulations	CG-AA-250a.1					Our product compliance teams, in each business unit and at the corporate level, regularly monitor regulations and other developments applicable to our products through subscriptions to different government agencies such as EUROPA / CPSC, industry groups, and third-party regulatory and chemical tracking and management service providers. Affected stakeholders in our company are notified when relevant new developments occur so that appropriate actions can be taken.
Discussion of processes to assess and manage risks and/or hazards associated with chemicals in products	CG-AA-250a.2					We implemented RSL programs company-wide and within our businesses that 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 an assessment and approval process to minimize or avoid chemicals of concern in new products.  Our RBIS business maintains an 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 the RBIS RSL requirements. RBIS conducts over 2,200 tests of raw materials and products to confirm compliance with its RSL. Avery Dennison Smartrac also maintains an RSL relevant to RFID-enabled products to identify and restrict chemicals of concern.
Number of recalls issued Totals units recalled	RT-CP-250a.1		0 0	0 0	0 0	We issued no product recalls from 2019 to 2021.
Discussion of process to identify and manage emerging materials and chemicals of concern	RT-CP-250a.2					We implemented a Regulatory Early Warning System that uses a comprehensive approach to identify and track developments globally in product and chemical regulations, safety and environmental impacts. 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 response and management of issues.

Human Capital	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Occupational Health	and Safety						
						We comply with all applicable environmental, health and safety laws and regulations. We go beyond legal requirements whenever, in our judgment, it is prudent to do so.	
Health and Safety Policy						We've steadily improved our practices and increased employee involvement and training to achieve and maintain a world-class safety record.	Employee Health & Safety
						Our EHS Audit Program covers compliance with industrial hygiene and safety-related laws and regulations.	
						We experienced no fatalities in 2020 or 2021. 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	
(1) Total recordable incident rate and (2) fatality rate for direct	RT-CH-320a.1	403-2	TRIR: 0.24	TRIR: 0.21	TRIR: 0.21	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 returns home healthy and safe each day. We conducted a full investigation of the incident and a complete review of our safety procedures,	Employee Health &
employees and contract employees			LTIR: 0.12	LTIR: 0.11	LTIR: 0.11	and we reinforced our safety protocols to our global workforce.	<u>Safety</u>
			0.12	0.11	0.11	TRIR: Total Recordable Incident Rate. LTIR: Lost Time Injury Rate.	
						2021 data excludes recent acquisitions (Vestcom and ZippyYum).	
Efforts to assess, monitor and reduce exposure of employees and contract workers to long-term (chronic) health risks	RT-CH-320a.2					Our effort to assess and monitor exposure of employees and contract workers to long-term health risks is managed at the site level. Each site evaluates potential exposures and develops in-house monitoring plans.	

Human Capital	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Labor Relations							
Statement of commitment to a fair or living wage for all employees						We offer market-based, competitive wages in all markets where we compete for talent. All of our employees are paid at least the applicable legal minimum wage, and 96% of our employees were paid above the applicable legal minimum wage at year-end 2021.	
Paying temporary contract workers minimum wage and/or other employment benefits						Suppliers, contractors and subcontractors must compensate their 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.  Within our RBIS business, 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 five audits against this standard operating practice in 2021. At year-end 2021, our contingent workforce comprised less than 5% of the total RBIS employee base, including Smartrac employees.	Supplier Standards  Social Compliance Supplementary Standards
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	2019	2020	2021	Discussion	Source
Diversity and Inclusion							
Diversity, Equity & Inclusion Strategy						<ul> <li>We are a force for good, delivering positive social impact and enabling highly engaging work experiences where every voice matters.</li> <li>Diversity: Increase the diversity of voices and viewpoints across the organization</li> <li>Equity: Ensure fair treatment and provide equitable access to opportunities for all employees</li> <li>Inclusion: Create an environment of involvement, respect and connection for all employees</li> </ul>	Diversity, Inclusion, and Equal Opportunity Integrated Report
Total percentage of women in the workforce		102-8	38%	38%	38%	Our 2025 and 2030 sustainability goal is 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. More recent indicators reflect the progress we are making with developing our internal pipeline development. 2021 data excludes certain acquisitions (Vestcom and Yongle Tape).	Integrated Report
Total percentage of female executives			28%	25%	23%	Defined as Vice President level and above. 2021 data excludes acquisitions (Vestcom and Yongle Tape).	
Total percentage of women in manager level and above roles			34%	34%	35%		
Percentage of women in manager level roles				35%	36%		
Percentage of women in supervisory level roles				39%	40%	2021 data excludes acquisitions (Vestcom and Yongle Tape).	
Percentage of women in professional level roles				52%	52%		
Percentage of women in clerical and manufacturing roles				36%	36%		
Gender pay ratios  Avery Dennison - ESG Doy	1.044550	12022				As part of our commitment to diversity, equity and inclusion, we have evaluated pay equity for the last four years, with support from a third party, each year expanding the population under review. We assess a number of factors including country, job function, level, performance and experience. We make changes to compensation, where appropriate, on an individual basis.	Proxy Statement

Avery Dennison - ESG Download (MARCH 2022)

Human Capital	SASB Reference	GRI Reference	2019	2020 2021		Discussion	Source
Diversity and Inclusion							
a. Percentage of gender and racial/ethnic group representation for (1) management and (2) all other employees b. Total amount of monetary losses as a result of legal proceedings associated with employment discrimination	CG-MR-330a.1			Ethnic / Racial 23% Managers 23% All other Employees	Ethnic / Racial 25% Managers 24% All other Employees	24% of our US-based workforce self reports being racially or ethnically diverse, as well as 25% of our US-based management (defined as employees who are assigned to a management job level). We do not report racial or ethnic diversity beyond our US 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. 2021 data excludes acquisitions (Vestcom and Yongle Tape). We do not currently track aggregated monetary loss data.	Integrated Report
Non-Discrimination Policy						We are committed to treating every employee fairly and with respect, which 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
Incidents of discrimination and corrective actions taken		406-1				We are committed to providing a work environment where all employees are treated with respect, courtesy and dignity. We do not report on specific incidents, but encourage and support teamwork and mutual respect among all employees.  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.  Violations of this policy result in prompt and appropriate preventive and/or remedial action, up to and including termination of employment.  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.	Code of Conduct

Human Capital	2020	2021	Discussion	Source
Diversity and Inclusion - EEO-1 (Equa	al Employn	nent Oppor	rtunity)	
Percentage of racially or ethnically diverse Executive/Sr. Level Officials	19%	22%		
Percentage of racially or ethnically diverse First/Mid-Level Officials	20%	22%		
Percentage of racially or ethnically diverse Professionals	24%	25%		
Percentage of racially or ethnically diverse Technicians	15%	17%	Data reflects the voluntary self-identification by our US employees of racial or ethnic diversity.  2021 data excludes acquisitions (Vestcom and Yongle Tape).	Integrated Report
Percentage of racially or ethnically diverse Sales Workers	14%	12%	Data included within this report represents 2021. Our 2020 EEO-1 (equal employment opportunity) statistics, which are collected by the US Equal Opportunity Commission to ensure compliance with federal anti-discrimination laws, are publicly available as a summary table. EEO-1 data reflects only our US	2020 EEO-1 Summary Table
Percentage of racially or ethnically diverse Administrative Support	18%	25%	workforce. Our 2021 EEO-1 summary table will be made publicly available once compiled and submitted.	
Percentage of racially or ethnically diverse Craft Workers	14%	13%		
Percentage of racially or ethnically diverse Operatives	24%	27%		

Business Model and Innovation	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Product Lifecycle Managem	ent						
FSC-certified paper percentage (1) Face only (2) All paper  Percentage of raw materials from (1) recycled content, (2) renewable resources and (3) renewable and recycled content	RT-CP-410a.1		1) 79% 2) 52%	1) 83% 2) 51%	1) 81% 2) 55%	Our 2025 goal is to procure 100% of the paper we purchase from certified sources, with 70% of that FSC-certified. In 2021, 81% of the face paper and 55% of the total paper we sourced was FSC-certified.  Beyond certified paper products, we are working on expanding our purchasing of renewable, recycled and bio-based source material. Currently, these materials make up less than 3.5% of our purchases.	
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: \$1.9B RBIS: \$0.7B	LGM: \$2.1B RBIS: \$0.7B	LGM: \$2.8B RBIS: \$0.9B	In July 2021, we launched our Sustainable ADvantage portfolio of sustainability-oriented products, which replaces our previously named ClearIntent products. In 2021, 50% of our LGM business' revenues and 55% of our RBIS Apparel business' revenues were from products that meet our Sustainable ADvantage standard.	Sustainable ADvantage
Discussion of strategies to reduce the environmental impact of packaging throughout its life cycle	RT-CP-410a.3					Launched in 2021, Sustainable ADvantage enables our customers to reduce their environmental footprint, satisfy consumer demand, increase recyclability and respond effectively to government regulations. As a showcase of our mission to build toward regeneration, Sustainable ADvantage enables circularity, improves environmental performance and facilitates transparency across our entire supply chain.	Sustainable ADvantage
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	2019	2020	2021	Discussion	Source
Supply Chain Management							
Percentage of total volume paper from certified sources	RT-CP-430a.1		89%	92%	91%	Our 2030 sustainability goals include sourcing 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.  Although the 2021 percentage is lower than the prior year, we took actions in 2021 to maintain our 2020 level of certification through internal reclassification of certification levels to improve traceability and accuracy, which is being audited by Rainforest Alliance in Q1 2022.	CDP Forests Response
Policy regarding the purchase of wood and/or wood-based products from sustainable sources						As a significant stakeholder in the supply chain of pulp and paper products, we recognize the importance of our role in promoting and providing sustainable and socially responsible paper products, specifically influencing our partners to not contribute to deforestation, and making sourcing decisions to promote and support biodiversity. This responsible paper procurement policy reflects our values and commitment to the sustainability and societal aspects of the paper products we source, manufacture and use.  Our 2030 goal is to source 100% of paper fiber from certified sources, focusing 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 provide 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 are FSC-certified but accept our supplier certifications from FSC, the Program for Endorsement of Forest Certification (PEFC) and Sustainable Forestry Initiative (SFI, for North America only) as certification of responsibly sourced raw materials.	

Business Model and Innovation	SASB Reference	GRI Reference	2019	2020	2021	Discussion
Supply Chain Management						
Total aluminum purchased, percentage of aluminium purchased from certified sources	RT-CP-430a.2		241 28%	343 39%	514 44%	We procure a small amount of aluminum directly. 2019 data was prior to our Smartrac acquisition; 2020 and 2021 reported data includes Smartrac. In 2021, 44% of the aluminum we procured was from sources certified by the Aluminum Stewardship Initiative, or an equivalent standard.  Unit of measure is ton.
Number of (1) Tier 1 suppliers  Number of (2) suppliers beyond  Tier 1	CG-AA-000.A (Activity metric)					Our RBIS business joined the SAC in 2012 as the first solutions provider in the network. Based on SAC criteria, we consider our manufacturing facilities to be Tier 1 factories.  RBIS does not directly use the Brand Retail Model (BRM), as it is not a producer of finished manufactured goods. In 2021, we joined the BRM Strategic Council.  For 2021, RBIS operated in 40 manufacturing, distribution or fast response unit locations and used 292 outsource suppliers across our global manufacturing base.

<sup>2019</sup> and 2020 data points for the following indicators have been updated in this document from prior disclosures:

- Total aluminum purchased, percentage of aluminium purchased from certified sources, previously stated as 6% and 45%.

Business Model and Innovation	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Supply Chain Management							
Sustainable Supplier Guidelines		308-1				Our Supplier Standards describe standards with which our suppliers are required to comply on matters such as working conditions, labor standards, anti-corruption and other 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 protect and preserve the environment. Compliance with these standards is an ongoing condition of doing business with our company.  Additionally, our RBIS business provides suppliers with Social Compliance Supplementary	Supplier Standards Social Compliance Supplemental
		414-1				Standards.  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.	Standards  RBIS Responsible Sourcing Policy
						Both documents also communicate our expectations regarding compensation, working hours, forced labor, child labor, discrimination and human rights, and freedom of association.	
Evaluation of suppliers on social and environmental risks and performance		408-1				Within our LGM and IHM businesses, we use EcoVadis to conduct annual social, environmental and ethical performance of their top-tier suppliers. The assessment produces an overall rating for each supplier, as well as a performance rating within the categories of Environment, Labor & Human Rights, Ethics and Sustainable Procurement. The report also highlights opportunities for improvement and includes news alerts with any emerging controversies. We also began benchmarking supplier emissions performance through CDP Supply Chain in 2021.	
		409-1				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 identified areas of 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. Before a supplier can be onboarded, it must pass this audit process.	

Business Model and Innovation	SASB Reference	GRI Reference	2019	2020	2021	Discussion
Labor Impacts in the Supply C	hain					
Percentage of (1) Tier 1 supplier facilities that have been audited to a labor code of conduct  (2) Percentage of supplier facilities beyond Tier 1 that have been audited to a labor code of conduct  (3) Percentage of total audits conducted by a third-party auditor	CG-AA-430b.1		1) 90% 2) 46% 3) 100%	1) 83% 2) 66% 3) 100%	1) 79% 2) 56% 3) 100%	During 2021, our RBIS business completed 195 social audits across our manufacturing facilities and 284 audits across those of our outsource partners. These audits were all conducted by third-party auditors.
Priority non-conformance rate and associated corrective action rate for suppliers' labor code of conducted audits.	CG-AA-430b.2					In 2021, RBIS Apparel completed 479 social audits, including 195 at our owned facilities (defined as Tier 1) and 284 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 actions and critical actions. 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 the greatest risks are related to working hours, occupational health and safety, and documentation regarding environmental assessments and certifications. When we do find violations, they are promptly addressed through our remediation processes.

Business Model and Innovation	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Raw Material Sourcing							
Percentage of production as: paper/wood and plastic	RT-CP-000.B (activity metric)					In 2021, our LGM, RBIS and IHM segments comprised approximately 65%, 26% and 9%, respectively, of our total sales.  For our combined LGM and IHM reportable segments, raw material costs represented 50% to 55% of net sales in 2021. ~45% of this spend was tied to specialty paper-based materials, ~25% to 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					Based on information provided by our suppliers, we have not identified any products that contain genetically modified organisms (GMOs).	
Description of environmental and social risks associated with sourcing priority raw materials	CG-AA-440a.1					While our RBIS business is 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. RBIS Apparel has 76% of its manufacturing, distribution or fast response facilities FSC-certified. For yarn-based materials, RBIS Apparel prefers Global Recycle Standard (GRS) yarn, and has certified 36% of its manufacturing, distribution and fast response facilities.	Supplier Standards  RBIS Responsible Sourcing Policy  Responsible Paper Procurement Policy
Percentage of raw materials third-party certified to an environmental and/or social sustainability standard, by standard	CG-AA-440a.2					RBIS Apparel has a strong commitment to making sustainable products. Within our most commonly used raw materials, certifications such as FSC, GRS and Oeko-tex are commonplace.  This category includes 80% of our manufacturing, distribution and fast response facilities with FSC certification, 38% with GRS certification and 50% with Oeko-tex certification.	

Social Capital	SASB Reference	GRI Reference	2019	2020	2021	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. Using 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 businesses 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			\$1.44M	\$3.53M	\$6.2M	Annual giving is measured in US dollars (\$). Values reflect giving from the Avery Dennison Foundation and our company.  In 2021, the Foundation focused on its historic funding areas (education, sustainability and women's empowerment), continued to address the impact of COVID-19, established a disaster response partnership and made grants to organizations promoting diversity, equity and inclusion across our operating regions.	Integrated Report
Workforce							
Number of employees	RT-CP-000.C (activity metric)		32,738	32,086	36,062		
Training Policy		404-1				To achieve our vision in a way that reflects our company's values, our goal is to attract, develop and retain the best talent, reflecting a diverse workforce at all levels.  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. At a minimum, all employees receive the training needed to perform their job duties as well as compliance and Values and Ethics training.  There are also a number of resources available to our employees globally to facilitate their career and personal development:  Onboarding System to support a well-structured onboarding of new employees Global Performance Management process, focused on how employees are performing and growing Career Development/Learning Centers that house tools for career development and training	

Leadership and Governance	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Workforce							
Percentage of favorable responses on employee engagement survey			82%	82%	82%	We conduct an annual company wide employee engagement survey. Percentages are derived from the proportion of respondents who stated they agree or strongly agree on a five-point Likert scale.  2021 data excludes acquisition of Vestcom.	
Employee training						Our philosophy for 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. Learning Advisor, our global learning platform, supports our employees in activating this approach in support of their personal and career development.	
		404-1				Through Learning Advisor, employees select from formal facilitator-led training or self-paced e-learning and toolkits. They can access ideas on how to activate learnings in their roles and tips on how to learn from others. To complement resources supporting individual development, we also provide various assessments, programs and interventions to enhance the effectiveness of our teams.	
						Additionally, there are local guidelines and policies in place at the majority of sites, as well as regional initiatives and programs, dedicated to facilitating and supporting the development of our employees.	
Employee turnover (voluntary/total)			10% 17%	9% 18%	12% 19%	2021 data excludes acquisitions (Vestcom and Yongle Tape).	

Leadership and Governance	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Privacy							
Data Protection Policy						We predominantly process personal data of our staff members and very limited personal data (such as contact information) of our customers, suppliers and other third parties we have a business relationship with. More information about personal data we collect and use is explained in our publicly available Privacy Notice. We have implemented a global privacy program to adequately protect personal data and ensure compliance with applicable privacy and data protection laws.	Privacy Notice  GDPR
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%	Our Code of Conduct covers the policies that guide work at our company, including responsibilities of employees, managers and leaders as well as workplace conduct, health and safety, and business ethics.	Code of Conduct
Employee Protection/ Whistleblower Policy						Our Code of Conduct contains language that covers employee protection, reporting of 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 describe the best practices and ethical behavior we expect from our suppliers.	Code of Conduct
Highest level of executive oversight for anti-bribery or anti-corruption						The Governance Committee of our Board of Directors oversees environmental sustainability and community investment matters, our Values and Ethics program, and potential conflicts of interest under our Legal and Ethical Conduct Policy.	
Anti-corruption training is provided to employees		205-2				Training topics include Antitrust Compliance, Code of Conduct, Conflict of Interest, Fraud Awareness, Global Export Controls and Preventing Workplace Violence. Four new classes were deployed in 2021 addressing Anti-Corruption.	

Leadership and Governance	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Business Ethics							
Percentage of computer-based workforce who completed e-learning courses on business ethics issues			88%	~94%	96%		
Percentage of all facilities for which an internal audit/risk assessment concerning business ethics issues has been conducted			96%	97%	100%	Our Internal Audit team conducts an annual, company-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 spend money on lobbying or political contributions. We are members of industry associations that may participate in lobbying.	
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 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 Response (C1.2a)  Proxy Statement
Board Committee with responsibility for sustainability						Board oversight of environmental sustainability is through the Governance Committee, while social sustainability, including Diversity, Equity and Inclusion, is overseen by the Talent and Compensation Committee. Our full Board receives regular updates in addition to the committee oversight.	CDP Climate Response (C1.2a)  Proxy Statement

Leadership and Governance	SASB Reference	GRI Reference	2019	2020	2021	Discussion	Source
Governance of CSR							
Executive Director with responsibility for sustainability						Our CEO provides guidance and direction to our President and Chief Operating Officer (formerly the Vice President and General Manager of our RBIS business), who leads our Sustainability Council and is responsible for ensuring our continued progress towards our 2025 and 2030 sustainability goals.	CDP Climate Response (C1.2a) Proxy Statement Integrated Report
Executive compensation linked to ESG						Our CEO's annual performance evaluation includes an assessment of his performance against his predetermined strategic objectives, which include progress toward our sustainability goals. Other Named Executive Officer (NEO) compensation decisions include consideration of relevant ESG performance.	CDP Climate Response (C1.2a) Proxy Statement
Employee sustainability training						Our employees receive regular communications about our sustainability commitments and additional focused trainings during our "Sustainable September" campaign.  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. LGM leaders and employees are trained on our sustainability strategy and goals and are offered deep-dive sessions on specific sustainability topics as well (e.g., Scope 3 GHG emissions). In 2021, we held a two-day Sustainability Symposium, where colleagues from LGM's R&D, sustainability and marketing teams came together virtually from around the world to discuss and learn more about the opportunities and challenges of sustainability.	
Board Diversity							
Percentage of women on the Board		405-1	18%	20%	22%	Due to changes in Board size, 25% of our 2022 Board nominees are women.	
Percentage of racial/ethnic minorities on the Board			18%	30%	33%	Due to changes in Board size, 38% of our 2022 Board nominees self-identify as from racial/ethnic minorities.	Proxy Statement
Board of Directors age range			48-71 years	49-72 years	50-69 years		<del></del>
Size of the Board	VAA DCLL 2022)		11	10	9	We have eight 2022 Board nominees.	35

