

FSC Core Labour Requirements Policy Statement

Policy Owner: Human Resources ANZ
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Coverage: All Avery Dennison Materials Pty Ltd Australia & New Zealand Sites
Classification: Avery Dennison - Internal

As an FSC CoC certificate holder, Avery Dennison ANZ must be able to demonstrate compliance with the 5 Core Labour Requirements. Avery Dennison Materials Pty Ltd has ensured its operations meet all of the FSC core labour requirements. In all circumstances, we have implemented whichever is the highest requirement - whether it be Australian Law or the FSC Standard into our operation. To ensure compliance, our Quality Team has completed a self-assessment and kept records to demonstrate compliance. The implementation of our commitment is then independently audited by our Certification Body annually. All contracted 3PLs are also required to conform to these requirements.

FSC Requirements - FSC-STD-40-004 V3-1 Chain of Custody Certification, Section 7

- 7.1 The organisation shall give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the requirements.
- 7.2 The organisation shall not use child labour.
- 7.3 The organisation shall eliminate all forms of forced and compulsory labour.
- 7.4 The organisation shall ensure that there is no discrimination in employment and occupation.
- 7.5 The organisation shall respect freedom of association and the effective right to collective bargaining

7.1 Rights and Obligations established by National Law

Avery Dennison will comply with all relevant Federal and State Law labour requirements.

Commonwealth Legislation	Victorian Legislation	Queensland Legislation
Age Discrimination Act 2004 Australian Human Rights Commission Act 1986 Disability Discrimination Act 1992 Equal Employment Opportunity Act 1987 Fair Entitlements Guarantee Act 2012 Fair Work Act 2009 Modern Slavery Act 2018 Paid Parental Leave Act 2010 Racial Discrimination Act 1975 Sex Discrimination Act 1984	Change or Suppression (Conversion) Practices Prohibition Act 2021 Charter of Human Rights and Responsibilities Act 2006 Child Employment Act 2022 Equal Opportunity Act 2010 Occupational Health and Safety Act 2004 Racial and Religious Tolerance Act 2001	Anti-Discrimination Act 1991 Child Employment Act 2006 Industrial Relations Act 2016 Labour Hire Licensing Act 2017 The Work Health and Safety Act 2011 (Qld)

Work Health and Safety Act 2011 Workplace Gender Equality Act 2012		
NSW Legislation The Work Health and Safety Act 2011 (NSW)	New Zealand Legislation Employment Relations Act 2000 The Human Rights Act 1993	

Updates, changes and reviews of the above legislation are provided by Ai Group briefings communicated to Human Resources on a periodic basis.

7.2 Child Labour

Child labour will not be used.

Workers below 15 or the minimum age set by State or Commonwealth law, will not be employed (exceptions for those under an approved school work experience program).

The age of new employees will be verified upon employment.

No person under the age of 18 will be employed in hazardous or heavy work, except for the purpose of training within approved national laws and regulation

Apprentices and trainees are signed up through an Australian Apprenticeships Support Network provider into a Training Contract with the Australian Government

7.3 Forced and Compulsory Labour

All forms of forced and compulsory labour shall be eliminated. Employment relationships are voluntary and based on mutual consent, without the threat of a penalty. Workers do not pay any fees to access employment to the organisation.

Any practices indicative of forced or compulsory labour are prohibited, including the following:

- physical and sexual violence
- bonded labour
- withholding of wages / including payment of employment fees and or payment of deposit to commence employment
- restriction of mobility/movement
- retention of passport and identity documents
- threats of denunciation to the authorities.

All employees will be provided an employment letter upon commencement that demonstrates that the employee can leave upon giving notice

Employment is voluntary, and workers can choose to leave their employment at any time without pressure, coercion or threat.

7.4 Discrimination in Employment and Occupation

Avery Dennison shall ensure that there is no discrimination in employment and occupation.
Employment and occupation practices are non-discriminatory.

Any form of harassment, discrimination and/or victimisation based on any grounds will not be tolerated, including the following:

- Sex, Sexuality, Chosen gender, Spouse or partner's identity
- Race, colour, nationality, descent and ethnic, ethno-religious or national extraction
- Physical or intellectual disability
- Family or carer's responsibilities
- Age, Marital or partnership status, Pregnancy or potential pregnancy
- Trade union membership or non-membership or employee representative activity
- Religion, Political opinion
- Irrelevant Criminal Record or History, Medical record

7.5 Freedom of Association and the effective right to Collective Bargaining

Freedom of association and the effective right to collective bargaining will be respected
Employees are able to establish or join employee organisations of their own choosing

Full freedom of employees organisations to draw up their constitutions and rules will be respected

Avery Dennison respects the rights of employees to engage in lawful activities related to forming, joining or assisting an employee organisation, or to refrain from doing the same, and will not discriminate or punish employees for exercising these rights

Avery Dennison negotiates with lawfully established employee organisations and/ or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement

Avery Dennison employees have individual contracts, therefore collective bargaining agreements are not currently in place (as at 4th October 2023).

Further Information

Further Information regarding policy and compliance can be sourced from the following Internal and External locations:

- Internal: [Company Information, Policies, Knowledge Articles \(ad.a / servicenow\)](#)
Internal: [OurWorld Internal Communications & Corporate Policy site](#)
External: [Avery Dennison Global site - Values, Diversity, Equity & Inclusion resources](#)

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Date: