

Avery Dennison ADvantage: Complete Compliance

Compliance Quick Facts Sheet

Conflict Minerals What is a conflict mineral?



Information on the U.S. conflict regarding minerals requirements is available [here](#).

A conflict mineral is extracted from mines in a conflict zone and sold to finance the fighting. The U.S. Congress enacted legislation on conflict minerals because of concerns that the exploitation and trade of certain minerals by armed groups is helping to finance conflict in the Democratic Republic of the Congo (DRC) region and contributing to a humanitarian crisis in the area. The legislation requires the Securities and Exchange Commission (SEC) to create rules that require companies to audit and disclose use of conflict minerals.

The U.S. SEC rules require publicly traded companies to report the origin of tin, tantalum, tungsten, and gold contained in their final products. A company that uses any of these minerals is required to conduct a reasonable country of origin inquiry (RCOI) to determine whether any of the minerals originated in the DRC or other covered countries. The company discloses its determination based on the results of the RCOI on a form required by the SEC and must also make the determination public, usually on the company website. Under certain circumstances, a Conflict Minerals Report and additional supply chain due diligence activities are required.

The European Union issued its own conflict minerals legislation that applies to anyone who directly imports a conflict mineral into the EU. In this case, a due diligence following OECD guidelines must be conducted and reported to the EU Due Diligence Portal. The EU requirements also apply to other conflict regions beyond the DRC region.

In both regions, many companies use the Responsible Minerals Initiative's (RMI) Conflict Minerals Reporting Template (CMRT) to track the country of origin of the conflict minerals as well as the smelters and refiners from which they or their suppliers obtain these minerals.

Avery Dennison ADvantage: Complete Compliance is a global service initiative that helps customers navigate the complexities of regulatory, trade and customer compliance issues. Complete Compliance delivers training, tools and advice that guides customers through regulatory data and certifications to ensure products meet the compliance demands of specific applications.

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Avery Dennison Conflict Minerals Compliance and Policy

Avery Dennison is committed to the ethical sourcing of components and materials we use in our products and to compliance with the U.S. requirements regarding conflict minerals. We have a process to assess whether any of our products may contain conflict minerals from the covered countries, and our goal is to refrain from purchasing components and materials containing the designated minerals unless certified by an independent third party to originate from conflict-free sources. Avery Dennison actively works with our suppliers and others in the complex global supply chain to confirm that no minerals in any of our raw materials finance continued conflict in the DRC or other covered countries.

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