



Avery Dennison
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RE: Forced Labor Prevention

Dear Valued Customer:

Avery Dennison is aware of the recent legislative and policy developments regarding forced labor, including the Uyghur Forced Labor Prevention Act (UFLPA). The purpose of this letter is to inform you that, to the best of its knowledge, no good or component of any good that Avery Dennison imports is made using forced labor. Further, this letter describes Avery Dennison's efforts to ensure that it remains in compliance with laws and regulations relating to forced labor in its supply chain.

Importantly, Avery Dennison does not procure any materials or goods from regions identified by the UFLPA as having high incidents of forced labor. Moreover, none of the materials specified by the United States as "Goods Produced by Child or Forced Labor" (cotton, garments, footwear, electronics, gloves, hair products, polysilicon, textiles, thread/yarn, and tomato products) are used by Avery Dennison's Label & Graphics Materials (LGM) or Industrial & Healthcare Materials (IHM) businesses in any of their products.

Avery Dennison is committed to treating our employees fairly and respectfully, and we require the same of our supply chain. We are committed to ensuring that there is no forced labor in our supply chains or any part of our business. We have zero tolerance for such practices and recognize our responsibility to be aware of the risks within our organization and supply chain and to take proactive measures to prevent and remediate such practices.

To that end, our internal corporate Employment Standards, our [Global Supplier Standards](#), [Human Rights Policy](#), our [Code of Conduct](#), and our [Values](#) help to ensure consistent and fair employment practices -- including the prevention and remediation of forced labor -- in our facilities and those of our suppliers worldwide.

Our strong commitment to ensuring transparency and fairness in our supply chain, including but not limited to forced labor and child labor, is expressed in our [Global Supplier Standards](#) and [Human Rights Policy](#), with which our entire supply chain must comply. Those policies expressly prohibit suppliers, contractors, and subcontractors from using forced labor, including prison labor, indentured labor, or debt bondage, under any circumstances. Both policies are guided by human rights principles, including those established by the International Labour Organisation's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact. Avery Dennison has been a member of the UN Global Compact since 2020.

Our LGM procurement organization, which also procures materials for our IHM business, introduced an oversight program for suppliers in 2016, based on a platform developed by the third-party consultant

EcoVadis. The program rates suppliers on a range of labor and human rights issues that align with our Global Supplier Standards. We will intervene with suppliers determined to be high risk and help them remediate any violations. If they do not make the required improvements within a specified time frame, our policy is to terminate our relationship with the supplier. In 2021, EcoVadis audited 63 of our suppliers, representing approximately 81% percent of LGM's and IHM's procurement spending. No suppliers were found to use forced labor.

Avery Dennison strongly encourages employees and third parties to report potential violations of our Code of Conduct, Employment Standards, and Global Supplier Standards, including any concerns regarding the use of forced labor. Various channels are available to report such concerns, including employees' line managers, Human Resources, Internal Audit, and the Law Department. Employees and third parties may also raise concerns — anonymously if they choose — by contacting our [Business Conduct GuideLine](#). The GuideLine is reachable through a toll-free hotline in each country where we do business or by filing a report online via a secure system. An independent third party operates the GuideLine and accepts reports in any language to accommodate our global workforce, customers, and suppliers. All reports are investigated under the direction of our Chief Compliance Officer, in consultation with the Law Department and senior management, and with oversight from the Governance and Social Responsibility Committee of our Board of Directors. From January 1, 2020, through July 31, 2022, we received 525 reports to our Business Conduct GuideLine. None of the reports contained allegations related to slavery, human trafficking, forced labor, or servitude.

We have also upgraded our third-party compliance framework to meet best practices suggested by the U.S. Department of Justice guidance. And, we are continuing to improve compliance and oversight in our multiple, complex supply chains, step by step. As part of our ongoing work to have robust and transparent supply chains and in response to the UFLPA, Avery Dennison has taken or will be taking the following actions:

- Our third-party compliance framework includes regularly screening the third parties we work with, including our suppliers. We can confirm that, as of the date of this letter, we have screened the entities on the UFLPA entity list and that we do not have dealings with any of them.
- We can also confirm that as of the date of this letter we have no direct dealings with any companies on the Specially Designated Nationals (SDN) list as published by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). Furthermore, we continue to monitor and ensure we have no dealings with entities added to the SDN list.
- As stated above, we can confirm that we have no production in nor do we source directly from regions where forced labor is a known risk, and our LGM and IHM businesses do not utilize any materials specified by the United States as "Goods Produced by Child or Forced Labor."
- We continue to audit our supply chains, including checks on whether we have any suppliers or service providers located in or working closely with companies in the regions associated with a higher risk of forced labor. These checks are carried out through questionnaires sent to suppliers and a review of existing audit data and data available in the public domain. To the best of our knowledge, we currently have no supplier within our supply chain that use forced labor. As you

know, due diligence of supply chains is very challenging. Therefore, any information or suggestions you consider may be useful to us in our checks on higher-risk supply chains would be much appreciated.

We hope that our compliance with the UFLPA and related legislation and regulations provide you, our valued customer, with peace of mind and make Avery Dennison your supplier of choice. We thank you for your continued business and look forward to continuing to help you thrive.