

**Section Name:** CORPORATE POLICIES – EMPLOYEES  
**Section No:** 2  
**Policy No:** 2.15  
**Subject** NON-RETALIATION

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**Date:** 04/12  
**Supersedes:** 07/08

The Company encourages employees to report potential violations of the law\* or Company policies, as well as potentially unethical conduct. Retaliation against employees for making these reports is strictly prohibited. The Company also strictly prohibits retaliation against employees who participate in an investigation of possible violations of law or policies or of unethical conduct, or who file or support a complaint or charge with a government agency.

"Retaliation" generally consists of conduct by a manager, supervisor, or co-worker that is designed to punish or attempt to punish an employee in response to the employee's good faith reporting, participation in investigations, or filing or supporting a claim or a charge (as described above) and may include: tangible adverse actions against the employee (such as termination, denial of promotion, or negatively affecting compensation), harassment that unreasonably interferes with an employee's performance or that creates a hostile work environment, or actions that may not have an immediate tangible effect but that are significant, such as denial of necessary training or exclusion from key meetings.

\*Examples include allegations of: criminal matters such as fraud, theft and embezzlement; inappropriate payments or "kickbacks", including violations of the Foreign Corrupt Practices Act (FCPA) or U.K. Bribery Act of 2010; violations of laws or regulations including those pertaining to import/export regulations, Value Added Tax (VAT), antitrust, intellectual property, insider trading, the environment, health or safety, or harassment or discrimination; and fraudulent accounting, such as violations of the Sarbanes-Oxley Act of 2002, including fraud, falsification and/or intentional misstatement of revenues and, intentional destruction or creation of documents to impede or influence any existing or contemplated investigation.

## **PROCEDURE**

- A. Communication. Corporate Compliance shall ensure that each business unit properly communicates the Company's policy prohibiting retaliation.
- B. Reporting and Investigation of Possible Retaliation
  1. Employees. An employee who believes s/he has been subjected to retaliation, or who observes such conduct, is expected to report this matter promptly in any of the following ways: (a) to any member of Human Resources; (b) to any member of management whose job position in the Company is senior to (i.e., at a higher job level) that of the employee making the report; (c) to Corporate Compliance; (d) to any attorney in the Law Department or (e) to the Business Conduct GuideLine ((888) 567-4387 - US; 10-800-711-0729 - North China; 10-800-110-0672 - South China, Collect at +1 (704) 731-0166 Internationally, or via the web at <https://www.financial-integrity.com/AveryDennison.jsp> - Europe or <https://www.integrity-helpline.com/AveryDennison.jsp> - outside of Europe, which also allow for anonymous reporting.
  2. Managers – Supervisors Mandatory Reporting Obligations. Any manager or supervisor who receives a report of potential retaliation, or who observes or hears about potential retaliation, must report the information immediately.

Failure to make such a report may subject the manager or supervisor to potential discipline, up to and including termination of employment.

3. Appropriate postings at facilities should inform employees of how and to whom reports of retaliation should be made, including postings for the Business Conduct GuideLine.
4. Reporting and Investigation. Corporate Compliance, in conjunction with the Law Department, shall take appropriate steps to facilitate the prompt reporting, investigation and resolution of reports of potential retaliation. Investigations will be conducted promptly under the direction of the Law Department, confidential information will be disclosed only on a need-to-know basis as part of the investigation, and appropriate remedial relief will be taken when deemed necessary.
5. Discipline. All inappropriate conduct that is not consistent with this Non-Retaliation Policy is unacceptable in the workplace whether or not the conduct is also unlawful, and employees who engage in such conduct will be subject to discipline up to and including termination of employment.