

Section Name: CORPORATE POLICIES – COMMUNICATIONS
Section No: 6
Policy No: 6.2

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Subject COMMUNICATIONS TO THE NEWS MEDIA

Avery Dennison strives to build and protect its brand and reputation in ways that help build the business. In doing so, the company seeks to secure consistent, accurate and favorable coverage of the company's products and activities while maintaining respectful and cooperative relationships with members of the news media.

Avery Dennison defines “media relations” broadly. The term covers the company's relationships with local, regional and national newspapers, television and radio; trade media; and social media, including blogs, Tweets, Facebook and YouTube postings. Interactions with the media may include news releases to general, financial and trade media; interviews and requests for interviews with company officials and other employees; proactive campaigns to elicit media coverage; responsive statements used to address questions from members of the media; news releases, profiles and case studies published by trade media or industry analysts; postings on the company's official Facebook, Twitter and YouTube accounts, and responses to others' postings about the company on those channels.

Corporate Communications is responsible for interaction with general interest media and social media and focuses on policies, practices, financial matters and issues that cross business unit boundaries and which could affect the company's reputation. There are Corporate Communications team members assigned to business units who are responsible for media inquiries about organization announcements of interest to the industry, facility expansion, employee recognition and community participation.

Trade media contacts and relationships are the responsibility of the marketing communications teams of each business unit. Marketing communicators handle inquiries from trade reporters, which are usually about products and industry events and trends. Inquiries with potential company-wide relevance are shared with Corporate Communications.

Business unit managers are encouraged to consider, and be aware of, potential media interest in their business unit's activities (e.g., facility expansions and moves, changes in management, reductions in staff, significant new products). These activities should be brought to the attention of Corporate Communications and Marketing Communications well in advance in order to develop the best plan for stimulating media interest (or handling it).

POLICIES AND PROCEDURES

Only designated spokespersons are permitted to speak to the media on behalf of Avery Dennison.

Unit managers should advise employees of this policy and emphasize that contacts and discussion with the media about company matters are prohibited.

This applies to all requests from all media – global, national, regional, and local – including newspapers, broadcast and cable television, radio, news wire services, Internet news services, blogs, and social media including Facebook, Twitter and YouTube.

Employees must direct all media enquiries to Corporate Communications, which will plan and coordinate the development and delivery of an appropriate response.

This requirement applies with particular force to requests involving the company's intellectual property and requests for financial information, including information about product sales and sales projections. See Policy 6.3, Financial Public Relations and Disclosure.

Disclosure of information about the company on social media sites is governed by Policy 6.9.

IF YOU ARE CONTACTED BY A REPORTER

Write down his/her name, the name of the publication he/she works for, a telephone number and email address, and ask for his/her deadline. Explain that you are not the correct person to speak to but that you will have someone from Corporate Communications get back to them as soon as possible. Immediately inform the Corporate Communications employee for your business unit and/or geography (see above).

All contacts with reporters, casual or otherwise, must be reported to Corporate Communications.

CRISIS COMMUNICATIONS

Corporate Communications is also responsible for crisis communications.

For a detailed discussion of the process for responding to media inquiries or reports about issues, emergencies and crises, please refer to the company's full crisis communications plan. Basic rules are outlined below.

Emergencies, issues and other topics of potential interest to the media that may be sensitive or in some way reflect negatively upon the company shall be referred to Corporate Communications immediately. These issues or topics include but are not limited to:

- Fires, explosions or natural disasters
- Employee accidents or death
- Environmental impact of a company facility or product
- Financial disclosures
- Labor relations
- Plant closures, workforce reductions
- Alleged criminal activity by employees

In the event of an emergency or crisis, local management shall immediately follow the established procedures for crisis response (following the procedures set forth in Corporate Policy 4.7), even as information on the event is being gathered. Local management should concentrate on dealing with the event and employees and refer media inquiries to Corporate Communications. Corporate Communications will work with the business unit's communications leaders, onsite, personnel and potentially external public relations agencies to develop an incident-specific crisis communications plan that will identify spokespersons responsible for speaking with the media and other stakeholders, including employees, their families, customers, regulatory agencies and the general public.

To respond quickly and effectively in the event of an emergency or crisis, it is critical that

local management have in place, as part of the unit's crisis management plan, a media relations plan, which can be executed as soon as an emergency or crisis occurs. Corporate Communications shall assist with the development of this portion of the crisis management plan as well as its execution. Such a plan shall include the provisional designation of a spokesperson(s), who shall handle media inquiries following the guidelines outlined below in Exhibit 6.2B, Media Relations in Emergency Situations.

Updates:

Global Corporate Communications

References:

Corporate Policies:

4.7, Emergency Preparedness, Business Continuity Planning and Crisis Management

6.3, Financial Public Relations and Disclosure Exhibit/Crisis Communications

Procedure

Social Media

7.8, Response to Government Investigations

Avery Dennison and the Media: News Media Policy Guide (available from Corporate Communications)

Related Topics

Section Name	Policy No	Subject
CORPORATE POLICIES – COMMUNICATIONS	6.3	Financial Public Relations and Disclosure
CORPORATE POLICIES – LAW	7.8	Response to Government Investigations
CORPORATE POLICIES – OPERATIONS	4.7	Emergency Preparedness, Business Continuity Planning and Crisis Management