



**CONFIDENTIAL
ATTORNEY CLIENT COMMUNICATION**

Avery Dennison recognizes and respects the fact that many employees are using the Internet for “social networking.” Given the nature of social networking, it is important that employees understand what is expected of them when they blog, post, share and/or upload information via social networking tools — even when the activity is conducted off-duty using personal electronic resources. This policy provides guidance to help ensure a positive experience that respects employees’ right to express themselves without compromising their commitments to Avery Dennison.

“Social networking,” for purposes of this policy, includes activities on interactive communications platforms including blogs, microblogs and other online journals and diaries such as Twitter[®]; content-sharing sites such as Facebook[®], YouTube[®], MySpace[®] and LinkedIn[®]; bulletin boards, message boards and chat rooms such as Yahoo! Groups[®]; Wikis such as Wikipedia[®] and similar media.* This policy does not apply to social networking on InfoXchange Connect, the Company’s intranet site.

PROCEDURES

Employees are expected to observe the following procedures while engaged in online social networking, regardless of whether they are using the Company’s electronic resources or their own.

1. **Social Networking While at Work.** Employees should limit their social networking activity while at work to non-working time such as authorized breaks and lunch periods, unless their job responsibilities include social networking on behalf of the Company. Employees should avoid engaging in social networking in a manner that is disruptive to others who are working.
2. **Official Company Social Media Sites.** Employees are encouraged to engage with Avery Dennison social media sites, such as our Facebook or Twitter pages, but only authorized employees are permitted to post information on behalf of the Company on Company-sponsored social media sites. To participate, employees must follow the procedures listed in the Rules of Engagement below.
3. **Using Company Name and Logo.** It is important that the Company maintain and protect the goodwill associated with the Avery Dennison name. Therefore, employees must not use the Company name in the title of a social media channel without permission, or use the Company logo for any purpose without permission. Employees can give out their email address for business purposes, and those who are approved bloggers can start approved channels using their Company email address. Employees should not use or register their Company email address in connection with a personal social networking site.

4. Confining Discussion of Company Matters. Avery Dennison may require that employees temporarily confine their social networking to matters unrelated to the Company if the Company determines that this action is necessary or advisable to ensure compliance with securities or other laws and regulations.
5. Job References. Requests for job references or recommendations made on social networks should be referred to Human Resources for handling, in accordance with Corporate Policy 2.11, "Disclosure of Employee Information."
6. Company Policies Apply. Social networking is subject to all Corporate Policies including but not limited to "1.1, Legal and Ethical Conduct," "1.2, Employee Responsibility Concerning Assets," "2.8, Harassment and Violence-Free Workplace," "2.11, Disclosure of Employee Information," "7.10, Insider Trading," "7.13, Protection of Confidential and Proprietary Information" and "7.14, Data Management and Communication Systems."
7. Rules of Engagement. Employees whose social networking activities involve information related to Avery Dennison should follow these "rules of engagement":

- Be Transparent and Use a Disclaimer. Make it clear that you are an Avery Dennison employee and that the views you express are yours alone and do not reflect the views of the Company. Here is a sample disclaimer: *"The views expressed here are my own and do not represent the views of Avery Dennison."*

If you are authorized to act on behalf of the Company, clearly identify yourself, state that you work for or are affiliated with the Company, and explain your role or purpose for posting or commenting.

- Protect Confidential Information. Make sure your efforts to be transparent don't violate the Company's privacy or confidentiality policies. Don't post, otherwise disclose or use Company confidential or proprietary information when engaging in social networking. "Company confidential" or "proprietary information" includes, but is not limited to, photographs or videos of the Company's premises, operations, processes or products that have not reached the market; discussion of work projects, non-public Company financial information, future business performance, business plans or prospects; statements about an upcoming quarter or future period; information about alliances; and legal matters, litigation, management changes, personnel matters or stockholder issues.
- Protect our Supplier and Customer Relationships and their Privacy Rights. If you would like to mention customers, end users, vendors, alliance partners or suppliers in your social networking content, be sure to obtain prior approval from Corporate Communications and the party being mentioned.
- Present Avery Dennison in a Positive Light. If you have concerns about Avery Dennison's products or services, or the reputations of its current or former vendors, suppliers, or customers, speak directly with your manager or use InfoXchange Connect. Such discussions are not appropriate on external social media sites. Similarly, do not discuss competitors on social media sites.
- Get Approval Before Responding to the Media. If you are contacted by the media about social networking activities that relate to Avery Dennison, ask for guidance from Corporate Communications or your business unit's Communications contact before responding.

- Respect Coworkers. You are more likely to resolve complaints about work by speaking directly with your coworkers, supervisor or other management-level personnel than by posting complaints on the Internet. If, you decide to post complaints or criticism, be sure they are constructive and in no way defamatory or damaging to the Company or any of its employees. Avoid violating data privacy laws by never discussing personal information of fellow employees.
 - Use Care In Sending “Friend” Requests. Your manager should not send you a “friend” request, whether he or she is on or off duty. You may reject a “friend” request from any employee without repercussion.
8. Review of External Social Networking Activities. The Company reserves the right to review employee social networking activities to the fullest extent permitted by applicable law. This right applies even if the social networking activity is conducted anonymously or under a pseudonym. The Company may also report suspected unlawful conduct to appropriate law enforcement authorities.
9. Whom to Contact. For clarification of any aspect of this policy or for answers to questions about the appropriateness of any post, contact Corporate Communications, Human Resources or the Law Department before posting.

References:

Corporate Principles:

- 1.1, Legal and Ethical Conduct
- 1.2, Employee Responsibility Concerning Assets

Corporate Policies – Employees:

- 2.8, Harassment and Violence-Free Workplace
- 2.11, Disclosure of Employee Information

Corporate Policies – Law:

- 7.10, Insider Trading
- 7.13, Protection of Confidential and Proprietary Information
- 7.14, Data Management and Communication Systems

* All brands and product names are trademarks of their respective owners.