

Section Name: CORPORATE POLICIES – LAW
Section No: 7
Policy No: 7.22

Date: 08/13
Supersedes: 11/12

Subject EXPORT RESTRICTIONS

Avery Dennison's policy is to comply with U.S., EU and any other applicable jurisdictions' export control laws (collectively, "export control laws"). U.S. export control laws generally regulate exports of articles and technology from the United States, as well as re-exports of U.S.-origin products, goods containing U.S. materials or components, and U.S. technology; EU control laws generally regulate exports of dual-use goods and technology, as well as re-exports of dual use goods and technology from one foreign country to another. In addition, export control laws bar transactions with certain countries (and individuals and entities within those countries) that are subject to U.S. or EU embargoes or significant trade and economic sanctions. These restrictions may apply to a broad range of transactions involving proscribed countries and parties and restricted regimes, even if no U.S. or dual use goods or technologies are involved. Export control laws apply to officers, directors, employees and agents of the Company, U.S. citizens wherever they are located, and in some cases, our overseas affiliates.

Penalties for failure to comply with export control laws can include imprisonment, significant monetary fines, debarment from government contracting, and/or the loss of export privileges. Individual employees may also be subject to civil and criminal penalties, including jail terms, for violations of these laws. Violations or even allegations of wrongdoing or government investigations can inflict serious public relations and business harm on the Company.

PROCEDURE

The following Procedure is in force throughout the Company:

1. There can be no negotiations, transactions or dealings whatsoever of any type by any subsidiary, affiliate, division, or business unit of Avery Dennison in any country, whether direct or indirect (for example, through distributors, resellers or agents), with "proscribed countries" or their nationals as specified by U.S. or European authorities without a specific compliance review and advance clearance from the Law Department. The proscribed countries are those where embargoes or extensive or significant sanctions are in place. They currently are Cuba, Iran, North Korea, Sudan, and Syria.

In addition, all employees are prohibited from responding or forwarding (other than to the Law Department) any inquiry or other communication from Iran or Cuba without having obtained the prior consent of the Law Department; employees working in the U.S. and all U.S. nationals working for Avery Dennison outside of the U.S. are also prohibited from responding or forwarding (other than to the Law Department) any inquiry or other communication from any of the other proscribed countries. Employees should immediately advise the Law Department that such a communication has been received.

2. There are also other countries/regimes that may not be subject to a complete embargo but which are of concern because certain individuals or entities within their territories may have violated international principles ("restricted regimes"). No negotiation, transaction or dealing with any restricted regime or its nationals shall

take place, unless the persons or entities involved have been cleared in advance by the Law Department. Persons or entities of restricted regimes shall be reviewed by the Global Trade Management team in consultation with the Law Department; such review shall be conducted promptly in the event of a change in governing law and otherwise periodically and at least annually. The restricted regimes currently include Belarus and Burma (Myanmar).

3. Managers are responsible for ensuring compliance with this Policy and shall ensure that (a) employees whose responsibilities involve export and sales transactions, or purchase transactions, are familiar with the restrictions on doing business with such proscribed countries and restricted regimes as well as the procedures outlined in this Policy; and (b) there are no references to proscribed countries and/or restricted regimes in business unit brochures or marketing materials or on websites.
4. Any questions or concerns regarding trade or business with any proscribed country or party or with any restricted regime should be referred immediately to the Law Department. The proscribed countries and restricted regimes are subject to change by U.S. and/or European authorities, so this Policy should be reviewed from time to time.

Updates:

Law Department
Risk Management and Corporate Compliance
Finance

References:

Corporate Principle:
1.1, Legal and Ethical Conduct
Corporate Policies:
7.11, International Boycotts
7.19, Trade Compliance