



Supplier Standards

Version 2.4 | Sept 30, 2019



The Avery Dennison Supplier Standards (“Standards”) describe standards with which our suppliers are required to comply on matters such as working conditions, labor standards, anti-corruption, and similar legal and ethical requirements. These Standards underscore our commitment to integrity in business activities, abiding by government laws and regulations, providing employees with a safe and healthy working environment, treating employees with dignity and respect, and promoting sustainable practices to help in protecting and preserving the environment.

Avery Dennison reserves the right to implement affirmative steps to monitor and ensure compliance with these Standards and as changes in national and local laws may require. Suppliers that are not in compliance with the Standards described in this document may be required to implement corrective actions. Avery Dennison may take actions to cancel any outstanding orders or may terminate the relationship of any supplier that does not comply with these Standards or that fails to take any required corrective actions.

Compliance with these Standards is an ongoing condition of doing business with Avery Dennison. Avery Dennison holds all suppliers responsible for ensuring that they, and all of their contractors and subcontractors previously approved by Avery Dennison in advance, meet these Standards. Avery Dennison will actively monitor and collaborate with suppliers to ensure this commitment is achieved and maintained.



Our Values

Avery Dennison is committed to the following values, which form the foundation of our culture as well as our standards for professional conduct:

Integrity

We are driven by doing the right thing. Always.

Courage

We are brave in the face of adversity and the unknown.

External Focus

We get out to get better.

Diversity

We gain strength from diverse ideas and teams.

Sustainability

We are focused on the long-term health of our business, planet and communities.

Innovation

We use imagination and intellect to create new possibilities.

Teamwork

We are better when we work together and put others ahead of ourselves.

Excellence

We expect the best from ourselves and each other.

Avery Dennison expects our suppliers to act in accordance with these values by:

- Operating with integrity
- Delivering the best customer service
- Meeting or exceeding Avery Dennison’s quality and service expectations
- Focusing on “total cost” by undertaking continuous improvement activities
- Sharing innovative ideas with us and using our idea platforms for mutual growth
- Supporting our sustainability efforts, requirements and standards
- Promoting a diverse workforce

Laws, Regulations and Industry Standards

Suppliers and subcontractors must comply with all applicable international, national, and local laws and regulations (“Laws”). In situations where there is a conflict between these Laws and these Standards, suppliers will be required to meet the higher standard. Where these Standards contradict international, national and local law, suppliers should notify Avery Dennison promptly.

Employment Standards

All suppliers must meet the employment standards described below.

- 1. Compensation** Suppliers, contractors and subcontractors shall compensate all employees in compliance with all applicable local laws pertaining to wages, including overtime, and benefits. Suppliers and subcontractors may not make deductions from pay for disciplinary infractions, reporting unfair or illegal practices or other “whistleblowing” activities.
- 2. Hours of Labor** Except in extraordinary business circumstances, suppliers and subcontractors shall limit the number of hours worked in any seven (7) day work week to no more than sixty (60) hours, and employees must be given a minimum of one (1) day off in every seven (7) day work period. Where local standards differ, the requirements that provide for fewer hours per work week shall apply.
- 3. Forced Labor** Suppliers, contractors and subcontractors shall not use forced labor, including prison labor, indentured labor or debt bondage, under any circumstances. Avery Dennison requires its suppliers, contractors and their subcontractors to comply with the requirements of the UK Modern Slavery Act.
- 4. Child Labor** Suppliers, contractors and subcontractors shall not use child labor. The term “child” refers to a person younger than 15 or the local legal minimum age for employment, whichever is higher.
- 5. Discrimination/Human Rights** Suppliers and subcontractors shall not discriminate against any person or employee based on race, color, religion, sex, pregnancy, national origin, ancestry, citizenship, age, marital status, physical or mental disability, medical condition, sexual orientation or veteran status.
- 6. Freedom of Association** Suppliers, contractors and subcontractors shall respect the rights of workers to freely associate, form and join organizations of their own choice and bargain collectively.

7. Disciplinary Process Suppliers, contractors and subcontractors will not utilize any form of physical or mental disciplinary practices such as coercion, harassment (including sexual harassment), threats or corporal punishment. All workers must be treated with dignity and respect.

8. Health and Safety The health and safety of employees is paramount to Avery Dennison. Suppliers and subcontractors must always provide their employees with a safe and healthy workplace, and must operate their facilities in compliance with all health and safety Laws.

9. Environmental Suppliers and subcontractors must comply with all applicable environmental laws and ensure that other relevant requirements are achieved. Suppliers, contractors and subcontractors must take proactive measures to protect, and minimize impacts to, the environment.

Confidentiality

Suppliers, contractors or subcontractors may not use or disclose to any other person or entity any confidential or proprietary information or trade secrets of Avery Dennison or its customers, including without limitation, business plans, financial information, data, know-how, formulae, processes, designs, sketches, photographs, plans, drawings, specifications, samples, reports, pricing information, studies, findings, inventions, and ideas for any purpose other than to provide products and services to Avery Dennison. Any information that is not readily available to the public shall be considered confidential information.

Conflict of Interest

- Each supplier shall ensure that its financial, business, or other non-work related activities are lawful and free of conflicts to carry out its responsibilities to Avery Dennison.
- Each supplier must disclose all personal or family relationships with Avery Dennison, including but not limited to those with any Avery Dennison employees, representatives or agents that select, manage or evaluate such supplier.
- Each supplier must disclose all personal or family relationships with any government officials or representatives, politicians or political parties.

Bribes and Kickbacks

Avery Dennison has a zero-tolerance policy to all forms of corruption and bribery and expects its suppliers to comply with the laws and regulations relevant to countering corruption and bribery in all the countries Avery Dennison and the suppliers operate, including, but not limited



to, the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, the OECD Anti-Bribery Convention and any other applicable laws and regulations.

Right to Access

To measure compliance of suppliers with these Standards, Avery Dennison, or a third party designated by Avery Dennison, may conduct announced or unannounced audits, assessments and reviews of facilities. All suppliers, contractors and/or subcontractors are subject to assessment that may include inspecting facilities, gathering information from employees and reviewing relevant documentation and records.

Assessments may be conducted in the sole discretion of Avery Dennison. If violations are identified, Avery Dennison will provide the supplier with a written description of the violation(s), a detailed explanation of actions that must be taken by the supplier to correct the violation and a timeframe within which the corrections must be made. Failure to correct the violations within the prescribed timeframe may result in cancellation of orders and/or termination of the relationship.

For more information, contact:

Label and Graphic Materials	lgm.ihm.global.procurement@averydennison.com
Retail Branding and Information Solutions	RBIS.WW.SC.CAP@averydennison.com
Industrial and Healthcare Materials	lgm.ihm.global.procurement@averydennison.com

Making a Compliance Report

If you would like to make a report about a potential violation of Avery Dennison policy or Law, please contact the Business Conduct GuideLine on our global toll number **+1 720-514-4400** or submit a report online to **averydennison.com/guidelinereport** (averydennison.com/guidelinereport-eu for European employees).

For employees, toll-free numbers for all locations are available on OurWorld.