

Avery Dennison ADvantage: Complete Compliance

Avery Dennison ADvantage: Complete Compliance is a global service initiative that helps customers navigate the complexities of regulatory, trade and customer compliance issues. Complete Compliance delivers training, tools and

advice that guides customers through regulatory data and certifications to ensure products meet the compliance demands of specific applications.

Conflict Minerals What is a conflict mineral?

A conflict mineral is extracted in a conflict zone and sold to perpetuate the fighting. The U.S. Congress enacted legislation on conflict minerals because of concerns that the exploitation and trade of certain minerals by armed groups is helping to finance conflict in the Democratic Republic of the Congo (DRC) region and contributing to a humanitarian crisis there. The legislation requires the Securities and Exchange Commission (SEC) to create rules that require companies to audit and disclose use of conflict minerals.

The U.S. SEC rules require publically traded companies to report the origin of tin, tantalum, tungsten, and gold contained in their final products. A company that uses any of these minerals is required to conduct a country of origin inquiry to determine whether any of the minerals originated in the DRC or other covered countries. Then the company discloses its determination on a form required by the SEC, and also makes the determination public. Under certain circumstances, a Conflict Minerals Report and additional supply chain due diligence activities are required. The European Union is considering its own conflict minerals legislation.



Avery Dennison Conflict Minerals Compliance and Policy

Avery Dennison is committed to the ethical sourcing of components and materials we use in our products, and to compliance with the U.S. requirements regarding conflict minerals. We have a process to assess whether any of our products may contain conflict minerals from the covered countries, and our goal is to refrain from purchasing components and materials containing the designated minerals, unless certified by an independent third party to originate from conflict-free sources. Avery Dennison is actively working with our suppliers and others in the complex global supply chain to confirm that no minerals in any of our raw materials finance continued conflict in the DRC or other covered countries.

Information on the U.S. conflict minerals requirements is available at:

<http://www.sec.gov/News/Article/Detail/Article/1365171562058#.VOctUsZBIqo>

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