

Avery Dennison UK Tax Strategy

1. Introduction

Avery Dennison is a global manufacturer and distributor of pressure-sensitive adhesives and materials. The company is also engaged in the manufacture and sale of converted products and items that do not contain pressure-sensitive components, such as fasteners, tickets, labels, RFID inlays and tags, and printing devices, and provides related services. Key customers include the data processing, healthcare, retail, transportation, industrial and consumer goods, food and beverage and apparel industries.

This document sets out the UK tax strategy of UK entities¹ of the Avery Dennison Group ("the Group") in accordance with paragraph 19(2) of Schedule 19 of the Finance Act 2016. It applies to all UK taxes and relates to the period ending 31 December 2025 and the strategy will be reviewed and updated annually.

2. Our Commitment to Tax Compliance

The Group is committed to full compliance with all applicable UK tax laws and regulations. This means:

- **Accurate and timely filing:** We will accurately and timely file all tax returns and make all tax payments in line with legal requirements and deadlines.
- **Maintaining accurate records:** We will maintain accurate and complete records to support our tax filings.
- **Tax reliefs and incentives:** We will claim tax reliefs and incentives in line with the provisions of the tax law, where available.
- **Seeking professional advice:** Where necessary, we will seek professional advice from qualified tax advisors to ensure compliance with complex tax legislation.

3. Our Approach to UK Tax Planning

The Group only engages in tax planning that supports our legitimate business activities. Our approach to tax planning is guided by the following principles:

- **Alignment with business strategy:** Tax planning will align with the Group's overall business strategy and commercial objectives.
- **Transparency and integrity:** We will conduct our tax affairs in a transparent and ethical manner, ensuring that all transactions have commercial substance.
- **Sustainability:** We will consider the long-term sustainability of our tax planning strategies.
- **No artificial tax avoidance:** The Group will not tolerate any form of tax evasion (or facilitation thereof), nor will it engage in artificial or aggressive tax avoidance schemes.

Legal entities of the group in the UK: Avery Dennison Holding Limited, Avery Dennison Materials U.K. Limited, Avery Dennison Retail Information Services U.K. Limited, Avery Dennison U.K. II Limited, Avery Dennison U.K. Limited, Avery Dennison Office Products Manufacturing U.K. Limited, Integrated Retail Limited, Thermopatch UK Limited, Thermopatch Sports Limited.

4. Tax Risk Management

The Group recognizes that tax risks exist and is committed to managing them effectively. The group has a low tax risk appetite and the approach to tax risk is aligned to the approach taken for broader risks faced by the business. Our tax risk management strategy includes:

- **Identifying and assessing tax risks:** We will proactively identify and assess potential tax risks associated with our business activities.
- **Implementing controls:** We will implement commensurate controls to mitigate identified tax risks (in line with the group's tax risk appetite).
- **Monitoring and review:** We carefully evaluate and manage tax risks to ensure compliance while supporting business objectives. Where there is uncertainty about the application or interpretation of tax legislation, professional advice will be sought.

5. Relationship with HMRC

The Group seeks to maintain a constructive and transparent relationship with His Majesty's Revenue and Customs (HMRC). We will:

- **Be open and honest:** We will be open and honest in our dealings with HMRC.
- **Respond promptly:** We will respond promptly to all HMRC queries and requests for information.
- **Cooperate fully:** We will cooperate fully with HMRC to address areas of concern arising in any tax audits or investigations. in any tax audits or investigations.