

Slavery and Human Trafficking Statement 2025

This statement is published pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by the following UK entities (together, the “**Covered Entities**”) to ensure that slavery and human trafficking are not taking place in their businesses or supply chains:

The Covered Entities form part of Avery Dennison Corporation and its and subsidiaries (“**Avery Dennison**”). It describes steps taken to prevent slavery and human trafficking in Avery Dennison’s own business and its supply chain across our global operations. This statement is also intended to satisfy the reporting obligations of Avery Dennison under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and the California Transparency in Supply Chains Act.

Our Business and Supply Chain

Avery Dennison Corporation is a global materials science and digital identification solutions company. We are Making Possible™ products and solutions that help advance the industries we serve, providing branding and information solutions that optimize labor and supply chain efficiency, reduce waste and mitigate loss, advance sustainability, circularity and transparency and better connect brands and consumers. We design and develop labeling and functional materials, radio-frequency identification (RFID) inlays and tags, software applications that connect the physical and digital and offerings that enhance branded packaging and carry or display information that improves the customer experience. Serving industries worldwide — including home and personal care, apparel, general retail, e-commerce, logistics, food and grocery, pharmaceuticals and automotive — we employ approximately 35,000 employees in more than 50 countries. Our reported sales in 2025 were \$8.9 billion. Learn more at www.averydennison.com.

Our Values and Policies Regarding Slavery

We work to ensure that our employees and business partners, including our suppliers, know, understand and uphold high ethical standards.

Avery Dennison is committed to treating employees fairly and respectfully, and we require the same of our suppliers. Human trafficking, servitude and forced labor are global challenges for governments and businesses and we are committed to ensuring the rights of people in our supply chains and businesses. As part of this commitment, we perform monitoring and due diligence related to human trafficking and modern slavery.

We are committed to respecting human rights and fair labor practices in our business and supply chain as expressed in our [Human Rights Policy](#). This policy is guided by human rights principles, including those established by the International Labour Organisation’s 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Global Compact. The latter was founded in 2020 and is a non-binding United Nations pact to encourage businesses and firms worldwide to adopt sustainable and socially responsible policies and to report on their implementation. Avery Dennison has been a member since 2020.

Our internal corporate **Employment Standards** and our published **Global Supplier Standards**, as well as our **Code of Conduct** and [Values](#), help to ensure consistent and fair employment practices — including the prevention and remediation of slavery, human trafficking, servitude, or forced labor — in our facilities and those of our suppliers and subcontractors.

Values and Code of Conduct

Our company **Values** are the basis of our compliance culture. These **Values** shape our behavior and support our business and our people. They also drive how we treat our employees and how we expect our suppliers and subcontractors to treat their employees. Two values of specific relevance to our efforts to prevent slavery and human trafficking are **Integrity** and **Sustainability**. We act with integrity by doing the right thing and operating with honesty and transparency. Avery Dennison's **Code of Conduct** establishes the requirement that everyone working for us uphold our commitment to honest and ethical business practices. Among other things, it requires equal opportunity for all employees and applicants and prohibits unlawful discrimination or harassment. Our **Values** form the foundation of our culture as well as our standards for professional conduct. We expect our suppliers to act following our **Values**. This means that:

- We do not permit our suppliers to use child labor or forced labor;
- We require suppliers to provide their employees with a safe and healthy workplace, and to operate in compliance with all local environmental, health and safety laws; and
- We do not allow any kind of bribe, kickback, or other form of personal payment tied to our business arrangements.

Employment Standards, Supplier Standards and Social Compliance Supplementary Standards

Avery Dennison Supplier Standards drive the behaviors we require our suppliers to adopt. It also underpins the more specific obligations contained in our Employment Standards, [Global Supplier Standards](#) and [Social Compliance Supplementary Standards](#) (Solutions Group Apparel and Smartrac Only).

These standards underscore our commitment to integrity in business activities, complying with government laws and regulations, providing employees with a safe and healthy working environment, treating employees with dignity and respect, and protecting and preserving the environment. Avery Dennison's **Employment Standards** are mandatory and apply to all of our business units around the world. Avery Dennison's suppliers are obligated to comply with our **Global Supplier Standards**, which mirror our **Employment Standards** and describe the working conditions and employment standards with which our suppliers are required to comply. Specifically, all of our business units and suppliers must meet the employment standards described below:

- **Compensation.** Suppliers, contractors, and subcontractors shall compensate their employees in compliance with all applicable local laws concerning 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.
- **Hours of Labour.** 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 are more stringent, those local laws shall apply.
- **Forced Labour.** 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 subcontractors to comply with the requirements of the UK Modern Slavery Act.
- **Child Labour.** 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.
- **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, gender identity, gender expression, or veteran status.

- **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.
- **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.
- **Health and Safety.** The health and safety of employees are 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.
- **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 on, the environment.

Our [Social Compliance Supplementary Standards](#), applicable to the Solutions Group's owned locations and approved subcontractors, describe obligations concerning, among other things, forced labor and child labor in more detail and include specific case studies to assist suppliers with compliance.

Employee and Third Party Awareness of Our Policies

We regularly train our employees on key policies and procedures. We conduct recurrent training regarding our Code of Conduct, and provide Code of Conduct training to all new employees. In addition, we require designated employees to complete online training courses covering a variety of compliance topics. In 2025, approximately 40,000 such online courses were completed globally. Additionally, our Law Department conducts instructor-led training sessions following a risk-based approach. In 2025, the Law Department conducted 271 instructor-led training sessions. Finally, to ensure that the policies and principles encompassed in our Code of Conduct reach all of our employees globally, we also develop and launch three Values and Ethics "Talkabout" toolkits each year, which managers use to engage in meaningful discussions with their teams regarding topics from the Code of Conduct.

We also train some suppliers in regions and countries that are considered high risk based on their scores on Transparency International's Corruption Perception Index and the International Labour Organization's assessments of child and forced labor. Additionally, suppliers and subcontractors who are audited directly by us or by our third-party providers necessarily understand our strict prohibitions against slavery and human trafficking.

Risk Assessment and Due Diligence Processes

We have systems in place to identify and assess potential risk areas in our business and supply chain, mitigate the risk of slavery and human trafficking occurring in our business and supply chain, and protect whistleblowers. Given the larger employee footprint, locations and supply chain of Solutions Group, we have determined that the supply chains therein present a greater risk of human trafficking than our other businesses. Our due diligence reflects this risk-based approach.

Ensuring Compliance at our Facilities

To ensure compliance with our Employment Standards and Social Compliance Supplementary Standards, we conduct periodic audits at our owned and operated Solutions Group facilities around the world. We prioritize facilities to be audited according to their risk profile, taking into account factors like past audit performance and the prevailing labor conditions in the country where the facility is located. The audits are conducted by third-party workplace auditors. In 2025, 471 audits took place across Solutions Group manufacturing sites. Audit findings are documented, and sites are responsible for making any changes necessary to fully comply

with our policies. In addition to audits, we also provide employee training to ensure managers and employees understand their rights and our expectations.

Supplier and Sub-Contractor Selection

Our Solutions Group business operates a **Global Outsource Supplier Approval Procedure** before engaging subcontractors to ensure their compliance with our **Global Supplier Standards** and **Social Compliance Supplementary Standards**. The **Global Outsource Supplier Approval Procedure** standardizes the global approval for all outsource suppliers in Solutions Group and ensures that the required approval process has been carried out, prospective suppliers or outsource partners are screened, also on possible associations with a child or forced labor, and that suppliers meet all of our approval criteria, including passing a social compliance audit before becoming an approved supplier.

Existing Supplier and Subcontractor Audits

Our Solutions Group business operates a thorough oversight program for the subcontractors to whom it often outsources the production of clothing labels, tags, and other finished goods to ensure they comply with our **Global Supplier Standards** and **Social Compliance Supplementary Standards**. Through the program, we provide subcontractors with information and training to help them understand and comply with our standards. Third-party auditors then visit subcontractor facilities on our behalf. They inspect living conditions in employee dormitories, wages and working hours, employee insurance coverage, fire safety and more. We promptly suspend business with suppliers found to be non-compliant with certain criteria, such as child labor and fire safety. If suppliers are found to be non-compliant in other less critical areas, we work with them to help raise their standards. We believe working with key partners on improving their compliance is the most effective way to create change in our industry.

In 2025, the Solutions Group, which primarily serves the apparel industry, underwent 1,003 social audits, 471 for internal sites and 532 for its subcontractors.

Our Materials Group business, while considered lower risk, introduced its oversight program for top suppliers in 2016, based on a platform developed by the third-party consultant EcoVadis. The approach rates suppliers based on their answers to an online questionnaire covering a range of labor and human rights issues that align with our **Global Supplier Standards**. Our policy is to intervene with suppliers that reveal themselves to be high-risk and help them improve. If improvements are not made within a specified timeframe, our policy is to terminate our relationship with the company. In 2025, 75% of our Materials Group direct spend was covered by active, current EcoVadis assessments. Materials Group has an initiative in place to begin having all of its direct suppliers certify compliance with our Global Supplier Standards before being engaged as suppliers and subcontractors.

Reporting

Avery Dennison encourages employees and third parties to report potential violations of our **Code of Conduct, Employment Standards, Global Supplier Standards** and **Social Compliance Supplementary Standards**. Various channels are available to report any concerns related to those policies, including raising concerns to their managers, Human Resources, Internal Audit, or the Law Department. Employees may also raise their concerns — anonymously if they choose — by contacting our Business Conduct GuideLine using one toll-free hotline in each of the countries where we do business or filing a report online via a secure system. Our GuideLine is operated by an independent third party and accepts reports in any language to accommodate our global workforce, customers and suppliers. All reports are investigated under the direction

of our Chief Compliance Officer, in consultation with the Law Department and senior management, and with oversight from the Governance Committee of our Board of Directors.

In 2025, we received 352 reports to our [Business Conduct Guideline](#). None of the reports contained allegations related to slavery, human trafficking, forced labor or servitude.

We prohibit retaliation for good-faith reporting of concerns.

Remediation

Remediation for violations of our standards or the law is described in detail in ***Avery Dennison's Social Compliance Supplementary Standards***.

Next Steps

We have also started to carry out more extensive supply chain due diligence in what we consider potentially higher-risk supply chains. We continually look to implement improved processes and tools. We are evaluating further processes for auditing our suppliers and subcontractors in higher-risk jurisdictions. We will continue to refine our internal and external policies, including enhancing our third party risk management program and increasing use of supply chain visibility AI tools. Combatting slavery and human trafficking, and improving and maintaining social compliance, in our supply chain remains a part of our broader sustainability agenda.

Links to Additional Information

[Avery Dennison ESG Documents and Reports](#)

[Avery Dennison Conflict Minerals Report](#)

This Statement was approved by the Board of Directors of Avery Dennison Materials UK Ltd, Avery Dennison UK Ltd, Avery Dennison UK II Ltd, Avery Dennison Holding Ltd and Avery Dennison RIS UK Ltd on [DATE] 2026.

The Statement was signed by H.N. van Gijn in the capacity of the authorized signatory for the above-listed companies on 3 June 2026.

This statement was signed by Chris Johnson on behalf of Avery Dennison.