F0. Introduction

F0.1

(F0.1) Give a general description of and introduction to your organization.

Avery Dennison Corporation (NYSE: AVY) is a global materials science and manufacturing company specializing in the design and manufacture of a wide variety of labeling and functional materials. The company’s products, which are used in nearly every major industry, include pressure-sensitive materials for labels and graphic applications; tapes and other bonding solutions for industrial, medical and retail applications; tags, labels and embellishments for apparel; and radio-frequency identification (RFID) solutions serving retail apparel and other markets. Our reportable segments for fiscal year 2018 were (i) Label and Graphic Materials (“LGM”); (ii) Retail Branding and Information Solutions (“RBIS”); and (iii) Industrial and Healthcare Materials (“IHM”). In 2018, the LGM, RBIS, and IHM segments made up approximately 68%, 23% and 9%, respectively, of our total sales. In 2018, international operations constituted a substantial majority of our business, representing approximately 76% of our sales. As of December 31, 2018, we operated approximately 180 manufacturing and distribution facilities worldwide with approximately 30,000 employees and had operations in over 50 countries, with sales from continuing operations of $7.2 billion.

F0.2

(F0.2) State the start and end date of the year for which you are reporting data.

<table>
<thead>
<tr>
<th>Reporting year</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 1 2018</td>
<td>December 31 2018</td>
<td></td>
</tr>
</tbody>
</table>

F0.3

(F0.3) Select the currency used for all financial information disclosed throughout your response.

USD

F0.4

(F0.4) Select the stage(s) of the value chain which best represents your organization’s area of operation pertaining to forest risk commodities.

<table>
<thead>
<tr>
<th>Stage of the value chain</th>
<th>Timber</th>
<th>Palm Oil</th>
<th>Cattle Products</th>
<th>Soy</th>
<th>Other - Rubber</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Manufacturing</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>Please select</td>
</tr>
</tbody>
</table>

F0.5

(F0.5) Do you produce, use, or sell materials or products that contain any of the forest risk commodities?

<table>
<thead>
<tr>
<th>Product/Service</th>
<th>Produce/use/sell</th>
<th>Disclosing</th>
<th>Explanation if produce/use/sell but not disclosing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Yes</td>
<td>Yes</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Cattle Products</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Soy</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other</td>
<td>No</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

F0.6

(F0.6) Are there any parts of your direct operations not included in your disclosure?

No
(F0.7) Are there any parts of your supply chain not included in your disclosure?
No

F1. Current state

(F1.1) How does your organization produce, use, or sell your disclosed commodity(ies)?

Forest risk commodity
Timber

Activity
Using as input into manufacturing process for power generation

Form of commodity
Paper

Source
Multiple contracted producers

Country/Region of origin
Argentina
Austria
Belarus
Belgium
Bosnia and Herzegovina
Brazil
Bulgaria
Canada
Chile
China
Croatia
Cyprus
Czechia
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
India
Indonesia
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Norway
Poland
Portugal
Romania
Russian Federation
Slovakia
Slovenia
South Africa
Spain
Sweden
Thailand
Ukraine
United Kingdom of Great Britain and Northern Ireland
United States of America
Uruguay

% of procurement spend
Not applicable

Comment
The percentage of production and/or consumption data regarding paper is known internally but is not disclosed externally for competitive reasons.
F1.1a

(F1.1a) Indicate from which State/region(s) and municipality(ies) your disclosed commodity(ies) originate.

**Forest risk commodity**
- **Timber**

**Country/Region of origin**
- Argentina

**State/Region**
- Don't know

**Municipality**
- Don't know

*Please explain*
Avery Dennison is not aware of detail down to the municipality level of the origin disclosed commodities.

---

**Forest risk commodity**
- Timber

**Country/Region of origin**
- Brazil

**State/Region**
- Don't know

**Municipality**
- Don't know

*Please explain*
Avery Dennison is not aware of detail down to the municipality level of the origin disclosed commodities.

---

**Forest risk commodity**
- Timber

**Country/Region of origin**
- Indonesia

**State/Region**
- Don't know

**Municipality**
- Don't know

*Please explain*
Avery Dennison is not aware of detail down to the municipality level of the origin disclosed commodities.

---

F1.2

(F1.2) Indicate the percentage of your organization's revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.

<table>
<thead>
<tr>
<th>Commodity</th>
<th>% of revenue dependent on commodity</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Please select</td>
<td>The percentage of production and/or consumption data regarding paper is known internally but is not disclosed externally for competitive reasons.</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Cattle products</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Soy</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>
**F1.3** Do you own or manage land used for the production of your disclosed commodity(ies)?

<table>
<thead>
<tr>
<th>Forest risk commodity</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Own and/or manage land?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Don't own or manage land</td>
<td></td>
</tr>
</tbody>
</table>

**Type of control**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description of type of control</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

**Country/Region**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

**Land type**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Size (Hectares)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do you have a system in place to monitor forests-related risks?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of monitoring system</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description of monitoring system</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recent infraction(s)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Explanation of infraction</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;Not Applicable&gt;</td>
<td></td>
</tr>
</tbody>
</table>

**F1.4**

**F1.4** For your disclosed commodity(ies), indicate if you collect data regarding your own compliance and/or the compliance of your suppliers with the Brazilian Forest Code.

**Timber**

<table>
<thead>
<tr>
<th>Do you collect data regarding compliance with the Brazilian Forest Code?</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>No, we do not collect data</td>
<td></td>
</tr>
</tbody>
</table>

**Please explain**

Currently, Avery Dennison purchases products which have been certified by the Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SFI). SFI’s international recognition is increased by the endorsement of the Programme for the Endorsement of Forest Certification (PEFC). PEFC has also endorsed the American Tree Farm Standard (ATFS) and the CSA Z809 Standard (CSA). In turn, SFI recognizes both ATFS and CSA certified content in its supply chain.

**F1.5**

**F1.5** Does your organization collect production and/or consumption data for your disclosed commodity(ies)?

<table>
<thead>
<tr>
<th>Data availability/Disclosure</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Data available, but not disclosing</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Cattle products</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Soy</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

**F1.5b**

**F1.5b** Why is your organization not disclosing production and/or consumption data for your disclosed commodity(ies)?

<table>
<thead>
<tr>
<th>Forest risk commodity</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td></td>
</tr>
</tbody>
</table>

**Primary reason**

Data considered confidential

**Please explain**

The percentage of production and/or consumption data regarding paper is known internally but is not disclosed externally for competitive reasons.
F1.6

Have you identified sufficient sources of sustainable materials to meet your current operational needs? If yes, what are you doing to ensure the security/continuity of this supply?

Timber

Sustainable source identified
Yes

Primary action to ensure supply
Supplier improvement plans to increase capacity of supply

Please explain
Avery Dennison assesses sourcing risks three years in advance through sourcing roadmaps that identify any potential gaps. The sourcing roadmap reflects strategies to ensure that identified risks are effectively mitigated. Identifying sufficient sources of sustainable materials to increase capacity of supply has been effective in securing the supply of sustainable materials by qualifying additional sources as well as engineering and introducing new products to Avery Dennison’s business to ensure sources of sustainable materials. Our goal is to have all of our paper sourced from certified fiber by 2025 and 75% FSC.

F1.7

Has your organization experienced any detrimental forests-related impacts?
No

F2. Procedures

F2.1

Does your organization undertake a forests-related risk assessment?
Yes, forests-related risks are assessed

F2.1a

Select the options that best describe your procedures for identifying and assessing forests-related risks.

Timber

Value chain stage
Supply chain

Coverage
Partial

Risk assessment procedure
Assessed as part of an established enterprise risk management framework

Frequency of assessment
Annually

How far into the future are risks considered?
3 to 6 years

Tools and methods used to identify and assess risks
Internal company methods
FSC Global Forest Registry

Please explain
Avery Dennison has implemented a process regarding supply chain risk identification with RFA. This is done through identification of non-certified risk and unknown sources of paper supply within the annual validation process, with corrective actions identified. Additionally, Avery Dennison goes through a paper certification process with RFA where all paper purchased is validated. Lastly, the company has established a responsible paper sourcing policy, in order to guide the business made across its supply chain. Avery Dennison’s internal process for identifying and assessing forest-related risks is through the product and sourcing roadmaps. These roadmaps forecast risks three years in advance annually to be sure supply is secure and risk is mitigated.

F2.1b

Which of the following issues are considered in your organization’s forests-related risk assessment(s)?
Availability of forest risk commodities

Relevance & inclusion
Relevant, always included

Please explain
Avery Dennison assesses the availability of forest risk commodities through its annual sourcing roadmaps taken from a procurement standpoint looking out to a three year horizon. Avery Dennison qualify alternative sources of supply in every region of the world that materials are procured to minimize risk.

Quality of forest risk commodities

Relevance & inclusion
Relevant, always included

Please explain
Avery Dennison through sourcing roadmaps considers quality of forest risk commodities as a relevant risk. Avery Dennison sources materials on a product specification basis. Within the sourcing roadmaps, Avery Dennison looks to reflect the voice of customers and what the consumers need the product to do, as well as KPI measurements. Avery Dennison then takes the product specification to potential sources of supply.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion
Relevant, always included

Please explain
Avery Dennison monitors the impact of activity on the status of ecosystems and habitats through their commitment and certification through Forest Stewardship Council (FSC). The FSC commitment always reviews businesses impact on the status of ecosystems and habitats based on their guidelines.

Regulation

Relevance & inclusion
Not relevant, included

Please explain
Avery Dennison does not see regulation as a material risk to their operations.

Climate change

Relevance & inclusion
Not relevant, included

Please explain
Avery Dennison does not see climate change as a material risk to their operations.

Impact on water security

Relevance & inclusion
Not relevant, included

Please explain
Avery Dennison does not see impact on water security as a material risk to their operations.

Tariffs or price increases

Relevance & inclusion
Relevant, always included

Please explain
Avery Dennison considers tariffs or price increases in its risk assessments when looking for viable sources of supply. The company includes trade compliance and tariff assessment to develop plans to minimize risk.

Loss of markets

Relevance & inclusion
Not relevant, explanation provided

Please explain
Avery Dennison does not see loss of markets as a material risk to their operations.

Brand damage related to forest risk commodities

Relevance & inclusion
Relevant, always included

Please explain
Avery Dennison considers brand damage related to forest risk commodities in risk assessments. One way Avery Dennison puts sustainability policies into effect is through sourcing certified paper material. Additionally a minimum of 80% of their sources of supplier are measured on a third party audit platform - Ecovadis.

Corruption

Relevance & inclusion
Relevant, always included

Please explain
In part of Avery Dennison's external paper certification process there is a method to validating against corruption to protect against deforestation and ensures that sourced materials are being procured ethically and legally.
Social impacts

Relevance & inclusion
Relevant, always included

Please explain
Assessing the risks of social impacts from Avery Dennison’s products is included through the third party certification Avery Dennison has to evaluate unfair practices and social impacts through the supply chain with notice to fair trade labor practices.

Other, please specify
Relevance & inclusion
Please select

Please explain

F2.1c
(F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

**Customers**

Relevance & inclusion
Relevant, always included

Please explain
We are focused on value creation for all of our stakeholders, including customers, employees, communities and investors. Examples for customers include offering a portfolio of sustainable product solutions as well as ensuring compliance and traceability of these solutions.

**Employees**

Relevance & inclusion
Relevant, always included

Please explain
We are focused on value creation for all of our stakeholders, including customers, employees, communities and investors. Examples for employees include our visible commitment to our 2025 sustainability goals, demonstrating that we are running a responsible business and proactively responding to the sustainability challenges of our customers and the planet.

**Investors**

Relevance & inclusion
Relevant, always included

Please explain
We are focused on value creation for all of our stakeholders, including customers, employees, communities and investors. Examples for investors include our visible commitment to our 2025 sustainability goals, demonstrating that we are running a responsible business and proactively responding to the sustainability challenges of our customers and the planet.

**Local communities**

Relevance & inclusion
Relevant, always included

Please explain
We are focused on value creation for all of our stakeholders, including customers, employees, communities and investors. Examples for communities include making a positive difference for the communities in which we live and work through grantmaking and volunteerism. The Avery Dennison Foundation aims to advance the causes of education, sustainability, and women’s empowerment.

**NGOs**

Relevance & inclusion
Relevant, always included

Please explain
We are focused on value creation for all of our stakeholders, including customers, employees, communities and investors. We engage with several NGOs as a way to obtain guidance on minimizing risk for our stakeholders. This collaboration helps establish internal policies for sourcing decisions.

**Other forest risk commodity users/ producers at a local level**

Relevance & inclusion
Relevant, always included

Please explain
No other stakeholders are known outside of this list, if other stakeholders become known, they will be included in future risk assessments.

**Regulators**

Relevance & inclusion
Relevant, always included

Please explain
Within the forest industry and all industries it entails, all Avery Dennison's operations comply with local and federal regulations.

**Suppliers**

Relevance & inclusion
Relevant, always included

Please explain
Within the forest industry and all industries it entails, all Avery Dennison's suppliers comply with local and federal regulations. Additionally, approximately 80% of spend in suppliers have gone through an EcoVadis screening to reduce risk and develop a strategy for sustainability management.

**Other stakeholders, please specify**

Relevance & inclusion
Please select

Please explain

---

**F3. Risks and opportunities**

---

**F3.1**
F3.1a

(F3.1a) How does your organization define substantive impact on your business?

Avery Dennison defines substantive change as impacts on revenue, stakeholders, and costs, as well as availability of purchased goods. Indicators we recognize as having the potential to have a substantive impact include a 5% threshold of revenue, concerns or dissatisfaction expressed by key stakeholders relative to product cost, availability and/or quality, and cost increases as much as 5% (or significant risk of material availability). Any one of these elements, or a combination thereof, could be the basis for evaluating mitigating measures.

F3.1c

(F3.1c) Why does your organization not consider itself to be exposed to forests-related risks with the potential to have a substantive financial or strategic impact?

<table>
<thead>
<tr>
<th>Forest risk commodities</th>
<th>Primary reason</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Risks exist, but no substantive impact anticipated</td>
<td>Avery Dennison evaluates potential risks with a three-year horizon, and we do not see the potential for a substantive or strategic impact to forest-related risk. Avery Dennison considers the third-party certification (and therefore, responsibly managed) of its products and supply as a tactical method to mitigate risk. By sourcing multiple sources of supply in each region, we are able to help mitigate risk.</td>
</tr>
</tbody>
</table>

F3.2

(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?

<table>
<thead>
<tr>
<th>Have you identified opportunities?</th>
<th>Timber</th>
<th>Palm Oil</th>
<th>Cattle Products</th>
<th>Soy</th>
<th>Other - Rubber</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td></td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

F3.2b

(F3.2b) Why does your organization not consider itself to have forests-related opportunities?

<table>
<thead>
<tr>
<th>Primary reason</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opportunities exist, but none with potential to have a substantive financial or strategic impact on business</td>
<td>Through Avery Dennison’s product and sourcing roadmaps, we conduct a three-year evaluation of opportunities. Avery Dennison’s opportunities are identified in our 2025 sustainability goals, which includes continuing to grow the amount of certified paper they are sourcing.</td>
</tr>
</tbody>
</table>

F4. Governance

F4.1
(F4.1) Does your organization have a policy that includes forests-related issues?
Yes, we have a documented forests policy that is publicly available

**F4.1a**

**F4.1a** Select the options to describe the scope and content of your policy.

<table>
<thead>
<tr>
<th>Scope</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selected products only</td>
<td>Description of forests-related standards for procurement</td>
</tr>
</tbody>
</table>

Avery Dennison established the Responsible Paper Procurement Policy where the company is committed to operating the business in a responsible manner and making it easier for customers, supply chain partners, and employees to make a difference for the environment and the communities. As a significant stakeholder in the supply-chain of pulp and paper products, the company recognizes its important role and opportunity in promoting and providing sustainable paper products. This responsible paper procurement policy reflects the company’s values and commitment to the sustainability of the paper products we source, manufacture, and use.

**F4.1b**

**F4.1b** Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.

<table>
<thead>
<tr>
<th>Do you have a commodity specific sustainability policy?</th>
<th>Scope</th>
<th>Content</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Yes</td>
<td>Selected products only</td>
<td>Commitments beyond regulatory compliance (Reference to international standards and widely-recognized forests-related initiatives)</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Cattle Products</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Soy</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

**F4.2**

(F4.2) Is there board-level oversight of forests-related issues within your organization?
Yes

**F4.2a**

**F4.2a** Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

<table>
<thead>
<tr>
<th>Position of individual</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer (CEO)</td>
<td>Avery Dennison's CEO has input on forest-related issues in board meetings, as well as monetary impacts based on the success of Avery Dennison goals. In Avery Dennison's 2018 CEO Performance Evaluation, 5% of the total weighting was based on making progress towards our 2025 sustainability goals. The strategic objectives were then evaluated, with the 3% GHG reduction target met, 90% of the sites were landfill free, and with plans developed to make adjustments to gender pay equity as appropriate.</td>
</tr>
</tbody>
</table>

**F4.2b**
(F4.2b) Provide further details on the board’s oversight of forests-related issues.

<table>
<thead>
<tr>
<th>Frequency that forests-related issues are a scheduled agenda item</th>
<th>Governance mechanisms into which forests-related issues are integrated</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1: Scheduled - some meetings</td>
<td>Monitoring implementation and performance</td>
<td>Avery Dennison's CEO has input on forest-related issues in board meetings, as well as monetary impacts based on the success of Avery Dennison goals. In Avery Dennison’s 2018 CEO Performance Evaluation, 5% of the total weighting was based on making progress towards our 2025 sustainability goals. The strategic objectives were then evaluated, with the 3% GHG reduction target met, 90% of the sites were landfill-free, and with plans developed to make adjustments to gender pay equity as appropriate.</td>
</tr>
</tbody>
</table>

F4.3

(F4.3) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

<table>
<thead>
<tr>
<th>Name of the position(s) and/or committee(s)</th>
<th>Responsibility</th>
<th>Frequency of reporting to the board on forests-related issues</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer (CEO)</td>
<td>Both assessing and managing forests-related risks and opportunities</td>
<td>Quarterly</td>
<td>Avery Dennison’s CEO has direct responsibility with forest related issues as forest-related and other sustainability issues are tied to the CEO’s annual performance evaluation. The CEO receives quarterly sustainability updates in a formal review of how Avery Dennison is meeting the company’s sustainability targets.</td>
</tr>
</tbody>
</table>

F4.4

(F4.4) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

Yes

F4.4a

(F4.4a) What incentives are provided to C-Suite employees or board members for the management of forests-related issues (do not include the names of individuals)?

<table>
<thead>
<tr>
<th>Who is entitled to benefit from these incentives?</th>
<th>Indicator for incentivized performance</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td>Chief Executive Officer (CEO), Other C-Suite Officer</td>
<td>Achievement of commitments and targets</td>
</tr>
<tr>
<td>Recognition (non-monetary)</td>
<td>Chief Executive Officer (CEO)</td>
<td>Achievement of commitments and targets</td>
</tr>
<tr>
<td>Other non-monetary reward</td>
<td>Chief Executive Officer (CEO)</td>
<td>Achievement of commitments and targets</td>
</tr>
</tbody>
</table>

F4.5

(F4.5) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

No, and we have no plans to do so

F5. Business strategy

F5.1
(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

<table>
<thead>
<tr>
<th></th>
<th>Are forests-related issues integrated?</th>
<th>Long-term time horizon (years)</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long-term business objectives</td>
<td>Yes, forests-related issues are integrated</td>
<td>5-10</td>
<td>Forest related issues are integrated into long term strategic business plan to achieve the internal goal of 100 percent certified paper by 2025, 70 percent of which will be certified by the Forest Stewardship Council® (FSC), creators of the “gold standard” in sustainability for wood products.</td>
</tr>
<tr>
<td>Strategy for long-term objectives</td>
<td>Yes, forests-related issues are integrated</td>
<td>5-10</td>
<td>Forest related issues are integrated into long term strategic business plan to achieve the internal goal of 100 percent certified paper by 2025, 70 percent of which will be certified by the Forest Stewardship Council® (FSC), creators of the “gold standard” in sustainability for wood products.</td>
</tr>
<tr>
<td>Financial planning</td>
<td>Yes, forests-related issues are integrated</td>
<td>5-10</td>
<td>Forest related issues are integrated into long term strategic business plan to achieve the internal goal of 100 percent certified paper by 2025, 70 percent of which will be certified by the Forest Stewardship Council® (FSC), creators of the “gold standard” in sustainability for wood products.</td>
</tr>
</tbody>
</table>

F6. Implementation

F6.1

(F6.1) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?

Yes

F6.1a

(F6.1a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?

Other, please specify (Rainforest Alliance (RFA), Forest Stewardship Council (FSC))

F6.1b

(F6.1b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

- **Commodity coverage**
  - Timber
  - Criteria: Restricting the sourcing and/or trade of forest risk commodities to credible certified sources

- **Operational coverage**
  - Supply chain
  - % of total production/consumption covered by commitment: 61-70%
  - Cutoff date: 2010
  - Commitment timeframe: 2021-25

- **Please explain**
  Avery Dennison has a sustainability commitment to achieve 100% certified paper by 2025 of which 70% will be FSC certified and has a responsible paper sourcing policy. Annually, Avery Dennison goes through a paper certification process with RFA where all paper purchased is validated and tracked to the relevant forest and species type.

F6.2

(F6.2) Did you have any quantified targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?

Yes

F6.2a
(F6.2a) Provide details of your target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.

**Target reference number**
Target 1

**Forest risk commodity**
Timber

**Form of commodity covered**
Paper

**Type of target**
Third-party certification scheme

**Coverage**
Supply chain

**Traceability point**
<Not Applicable>

**Third-party certification scheme**
FSC Chain of Custody

**Start year**
2012

**Start figure**
31-40%

**Target year**
2025

**Target**
61-70%

**% achieved**
91-99%

Please explain
The provided information is reflective of Avery Dennison’s LGM/IGM perspective and does not include the RBIS portion of the business. This is not expected to have a significant or material impact on the overall progress.

---

F6.3

(F6.3) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Do you have system(s) in place?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Yes</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Cattle products</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Soy</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Other</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

F6.3a

(F6.3a) Provide details on the level of traceability your organization has for your disclosed commodity(ies).

**Timber**

% of total production/consumption volume traceable
100%

Point to which commodity is traceable
Please select

Description of traceability system
The point to which the commodity is traceable is known internally but is not disclosed externally for competitive reasons.

Exclusions
<Not Applicable>

Description of exclusion
<Not Applicable>

---

F6.4
Do you specify any third-party certification schemes for your disclosed commodity(ies)? Indicate the volume and percentage of your production and/or consumption covered.

Forest risk commodity
Timber

Do you specify any certification scheme?
Yes

Certification coverage
Consumption volume

Third-party certification scheme
FSC Chain of Custody
FSC Controlled Wood
FSC Recycled
PEFC Sustainable Forest Management certification

% of total production/consumption volume certified
100

Form of commodity
Paper

Volume of production/consumption certified
Metric tons

Please explain
The volume of production and/or consumption certified data regarding paper is known internally but is not disclosed externally for competitive reasons. Additionally, Avery Dennison plans to implement the SFI Forest Management certification scheme in the near future.

Do you specify any sustainable production/procurement standards for your disclosed commodity(ies), other than third-party certification? Indicate the percentage of production/consumption covered and if you monitor supplier compliance with these standards.

Forest risk commodity
Timber

Do you specify any sustainability standards?
No standard other than third-party certification

Type of standard
<Not Applicable>

Description of standard
<Not Applicable>

% of total commodity volume covered by standard
<Not Applicable>

Do you have a system in place to monitor compliance with this standard?
<Not Applicable>

Type(s) of monitoring system
<Not Applicable>

% of suppliers in compliance with standards
<Not Applicable>

Please explain
Are you working with your direct suppliers to support and improve their capacity to supply sustainable raw materials?

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Are you working with direct suppliers?</th>
<th>Supplier engagement approach</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>Yes, working with direct suppliers</td>
<td>Encouraging certification</td>
<td>Avery Dennison works with its direct suppliers to support and improve their capacity to supply sustainable raw materials. Our aim is to encourage certification through validating the amount of raw materials available, and build plans to expand their supply and develop new products. For example we have partnered with our suppliers to host workshops and training related to FSC certification. We have collaborated with suppliers and NGOs on expanding supply (ex: with small landowners). We are also collaborating with suppliers to develop new capabilities, such as recycling.</td>
</tr>
<tr>
<td>Palm Oil</td>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cattle products</td>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Soy</td>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>Not Applicable</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Are you working beyond your first-tier supplier(s) to manage and mitigate forests-related risks?

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Are you working beyond first tier?</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timber</td>
<td>No, not working beyond the first tier</td>
<td></td>
</tr>
<tr>
<td>Palm Oil</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>Cattle products</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>Soy</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>Other - Rubber</td>
<td>Not Applicable</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>Not Applicable</td>
<td></td>
</tr>
</tbody>
</table>

Do you participate in external initiatives or activities to further the implementation of your policies concerning the sustainability of your disclosed commodity(ies)?

Forest risk commodity

Timber

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

FSC

Please explain

Avery Dennison participates in external initiatives through the Forest Stewardship Council (FSC) by adopting the FSC's principles of forest management and certifying products through FSC. Through FSC certification Avery Dennison ensures that their products come from responsibly managed forests that provide environmental, social and economic benefits.

Does your organization have any project(s) focused on reforestation, habitat restoration, or habitat protection that are not part of your production cycle?

No

Has your organization identified any linkages or trade-offs between forests and other environmental issues in its direct operations and/or other parts of its value chain?

No
F7.1b

(F7.1b) Why has your organization not identified any linkages or trade-offs between forests and other environmental issues?

<table>
<thead>
<tr>
<th>Primary reason</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Considered – none were identified</td>
<td></td>
</tr>
</tbody>
</table>

F8. Verification

F8.1

(F8.1) Do you verify any forests information reported in your CDP disclosure?

Yes

F8.1a

(F8.1a) Which data points within your CDP disclosure have been verified, and which standards were used?

**Disclosure module**
- F6. Implementation

**Data points verified**
- Fiber data, as stated in F6, is verified by the Rainforest Alliance. In 2019, 91% of this commodity was certified, with 9% being non-certified.

**Verification standard**
- The Rainforest Alliance is the verification standard.

**Please explain**
- Increasing sustainable production and/or consumption of the disclosed commodities is paramount to Avery Dennison's sustainable supply chain program.

F9. Barriers and challenges

F9.1

(F9.1) Describe the key barriers or challenges to avoiding forests-related risks in your direct operations or in other parts of your value chain.

- **Forest risk commodity**
  - Timber

- **Coverage**
  - Supply chain

- **Primary barrier/challenge type**
  - Limited availability of certified materials

- **Comment**
(F9.2) Describe the main measures that would improve your organization’s ability to manage forests-related risks.

<table>
<thead>
<tr>
<th>Forest risk commodity</th>
<th>Timber</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coverage</td>
<td>Supply chain</td>
</tr>
<tr>
<td><strong>Main measure</strong></td>
<td>Improved data collection and quality</td>
</tr>
<tr>
<td><strong>Comment</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Forest risk commodity</th>
<th>Timber</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coverage</td>
<td>Supply chain</td>
</tr>
<tr>
<td><strong>Main measure</strong></td>
<td>Increased demand for certified products</td>
</tr>
<tr>
<td><strong>Comment</strong></td>
<td></td>
</tr>
</tbody>
</table>

**F18. Signoff**

**F-FI**

(F-FI) Use this field to provide any additional information or context that you feel is relevant to your organization’s response. Please note that this field is optional and is not scored.

**F18.1**

(F18.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

<table>
<thead>
<tr>
<th>Row</th>
<th>Job Title</th>
<th>Corresponding job category</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Please select</td>
</tr>
</tbody>
</table>

**Submit your response**

In which language are you submitting your response?

- English

Please confirm how your response should be handled by CDP

<table>
<thead>
<tr>
<th>I am submitting my response</th>
<th>Public or Non-Public Submission</th>
<th>I am submitting to</th>
</tr>
</thead>
<tbody>
<tr>
<td>I am submitting to investors</td>
<td>Public</td>
<td></td>
</tr>
</tbody>
</table>

**Please confirm below**

I have read and accept the applicable Terms