

## **Avery Dennison Corporation**

### **Audit Committee Complaint Procedures for Accounting and Auditing Matters**

Avery Dennison Corporation (the “Company”) is committed to complying with all applicable laws and regulations regarding accounting, accounting standards, internal accounting controls and audit practices (“Accounting Matters”). The Audit and Finance Committee (the “Audit Committee”) of the Company’s Board of Directors is responsible for ensuring the appropriate treatment of complaints related to Accounting Matters under Section 301(4) of the Sarbanes-Oxley Act of 2002 and Section 10A of the Securities Exchange Act of 1934, as amended.

The Audit Committee has adopted the following procedures for:

- The confidential, anonymous submission of complaints regarding questionable Accounting Matters; and
- The receipt, retention and treatment of complaints regarding Accounting Matters.

Any person may submit a good faith complaint regarding Accounting Matters; employees of the Company may do so without fear of dismissal or retaliation of any kind.

#### Reporting Complaints

To report a complaint regarding Accounting Matters, one of the following methods should be used:

➤ Contact Vice President, Global Internal Audit. You can report a complaint in person, by telephone, by writing a letter or by e-mail (due to technical constraints, e-mail submissions may not be anonymous).

Eric Pohl, telephone 440-534-4965; e-mail: eric.pohl@averydennison.com; mailing address: 207 Goode Avenue, Glendale, CA 91203

➤ Call the Company’s Business Conduct GuideLine. This is a third party telephone “hotline” (1-888-567-4387 toll-free in the U.S. or 1-704-731-0166 collect from outside the U.S.) that allows you to report your complaint confidentially and anonymously.

Individuals with concerns regarding Accounting Matters may also report their concerns to any other Company officer, general manager or director-level employee, who will then forward the complaint to the Vice President, Global Internal Audit.

Information relating to a complaint regarding Accounting Matters will remain confidential, subject to the need to conduct an investigation. The identity of the person reporting a complaint via the hotline or contacting the VP, Global Internal Audit will remain a secret, to the extent the reporting person does not identify himself or herself in the communication.

All complaints will be investigated. Reports, if substantiated, will be resolved through appropriate corrective and/or disciplinary action. Due to the anonymous nature of some of the complaints, a person who reports a suspected violation may not be informed of the results of an investigation. Confidentiality will be maintained to the extent possible, consistent with the need to conduct an adequate review.

## Scope of Matters Covered by These Procedures

These procedures relate to complaints relating to any questionable Accounting Matters, including, for example, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement or other financial report of the Company;
- fraud or deliberate error in the recording or maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial statements, or other financial reports of the Company; or
- deviation from full and fair reporting of the Company's financial condition.

## Treatment of Complaints

Complaints (including anonymous complaints) that primarily relate to Accounting Matters will be referred to the VP, Global Internal Audit.

Upon receipt by the VP, Global Internal Audit, the Internal Audit Department will determine whether the complaint relates to Accounting Matters and, if not anonymous, acknowledge receipt of the report or, if anonymous, acknowledge receipt of the report via the hotline if the person calls back.

The Internal Audit Department will review, analyze and investigate each Accounting Matter complaint, and will consult with the Chief Compliance Officer and/or General Counsel, as appropriate. Significant complaints and those that involve officers of the Company will be brought promptly to the attention of the Audit Committee.

The Internal Audit Department will summarize each complaint concerning Accounting Matters and actions taken in response thereto, if any, and will provide quarterly reports (or more often as appropriate or as requested) to the Audit Committee.

The Audit Committee may take any further appropriate action including, among other things to: (i) refer the matter to the full Board of Directors; (ii) direct that further internal investigation be conducted; or (iii) retain outside counsel, accountants or other third-party advisors to investigate.

## Reporting and Retention of Complaints and Investigations

The Internal Audit Department will track the complaints and resolutions related to Accounting Matters. The Internal Audit Department will maintain a log of all complaints regarding Accounting Matters. Copies of these complaints and the resolution of the complaints will be retained in accordance with the Company's document retention policy.

The Audit Committee will report to the full Board of Directors periodically the results of significant investigations, if any, or, if the Audit Committee so desires, the details of any investigations.