



Retail Branding and
Information Solutions

Avery Dennison
3 Allied Drive
Dedham
MA 02026

15th February 2019

Alysha Khambay
Labour Researcher
Business & Human Rights Resource Centre

Bobbie Sta. Maria
Director for Labour Rights and Asia
Business & Human Rights Resource Centre

Dear Ms. Khambay and Ms. Maria,

I am writing to you in regards to the letter from International Union League for Brand Responsibility and the New Trade Union Initiative, which alleges sexual harassment of an Avery Dennison employee by a supervisory staff on the shopfloor, and the Company's failure to take cognizance of the matter.

In this regard, the Company would like to categorically state that it has zero tolerance towards any form of sexual harassment in the workplace, and takes seriously the investigation of all sexual harassment claims. The Company has accordingly constituted an Internal Committee, with qualified, senior members and an independent external member, in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") to receive, investigate and redress complaints of sexual harassment at the workplace in a respectful and time-bound manner. Annual training is provided to all employees on the prevention of sexual harassment in the workplace, and how employees can raise concerns.

In the context of the complaint raised by Ms. K.M., the allegation that the Company failed to take cognizance of the matter is emphatically denied. Please note that the Internal Committee had received two similar complaints from Ms. K.M. in the year 2018, alleging instances of misbehaviour by a shopfloor supervisor:

- A complaint was received on the evening of 16th March 2018. The Internal Committee reviewed the case the following day and the employee accepted and acknowledged the findings.
- The second similar complaint was received on 5th December 2018. The Internal Committee reviewed the case and the employee accepted and acknowledged the findings on 10th December 2018.

Please be advised that the Company received no written complaints from Ms. K.M in the years 2016 and 2017, as alleged in the letter.

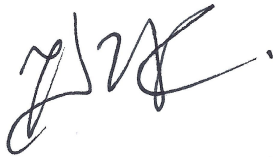
Both complaints were promptly and duly enquired into by the Internal Committee, in the manner prescribed under the POSH Act and were acted on in accordance with applicable law and the Company's policies. As per the strict confidentiality obligations prescribed under the POSH Act, we cannot disclose specific details of the complaint, investigation process, findings or action taken by Avery Dennison.

Further, we reiterate that Avery Dennison has zero tolerance for any form of workplace sexual harassment and the Internal Committee, as a grievance redressal forum, is available to all employees, irrespective of seniority, who are employed by or engaged with the Company. While the complaints raised by Ms. K.M. have already been investigated into and concluded, if Ms. K.M. wishes to raise issues, facts or circumstances other than what she has already submitted, she may submit a complaint at any time through Avery Dennison's Business Conduct Guideline.

We are confident that our process, and handling of this case meets the highest standards.

Please ensure that your Weekly Update, to be sent on 20th February 2019, and the relevant sections of your website state that Avery Dennison has responded to these allegations. In addition, please note that Sharene Katsoulas, whom you copied on your original correspondence to Avery Dennison, is no longer with the Company. I will serve as your point of contact moving forward, so please do not hesitate to get in touch if you require further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DS', with a long horizontal stroke extending to the right.

Debbie Shakespeare
Sr. Director Compliance and Sustainability
Avery Dennison RBIS