

Statement on Modern Slavery & Human Rights 2021

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Message from President



People are the core of our business – our customers, employees, suppliers, and contractors. We believe in a better tomorrow for everyone and are deeply committed to upholding human rights across our operations and supply chains.

We support and welcome the introduction of the *Modern Slavery Act 2018 (Cth)*. Our first modern slavery Statement is a practical outline of the work we have done to date, and a means to hold ourselves accountable to the work we will do in the future.

The exploitation of other people for personal or commercial gain contradicts every one of our company values. We recognise that Modern Slavery is a complex issue and we are committed to working in collaboration with peers, customers, government and non-government entities and advisors to address this challenge. As you will read in this Modern Slavery Statement, our commitment to human rights is embedded in our Code of Ethics as well as in Anti-Slavery Policy. We have identified areas of risk not just in our own operations, but also throughout our supply chain including suppliers, customers, community partners and contractors. All of them need to comply with our Anti-Slavery Policy. All of our policies, for instance Equal Opportunity, Recruitment and Selection, Sexual Harassment, Work Health and Safety, Workplace Harassment Bullying, Grievance are in place to ensure that every employee is treated fairly and equally. All reports are taken seriously and acted upon accordingly. Commitment to protecting, upholding, and advancing human rights, across all our business activities, is underpinned by the requirement that all employees and contractors have to comply with Anti-Slavery and other relevant policies.



We are committed to playing our role in respecting human rights and supporting the eradication of all forms of Modern Slavery as well as seek to continuously improve our approach to this risk management.

Our leadership team is proud of all that we have achieved this reporting period and we are committed to continuing to have an impact in this area.



Daren Hudson
President/Director Australia/New Zealand
MCC Australia

About MCC

A true global label solution provider, Multi-Color Corporation is one of the largest label companies in the world in the following market segments: Beverage, Wine & Spirits, Food & Dairy, Personal Care & Beauty, Home Care & Laundry, Healthcare, Durables & Technical and Automotive & Chemicals. With over 9,000 dedicated employees, we operate 80 label producing operations in over 27 countries today. Established in 1916 and headquartered near Cincinnati, Ohio, USA, Multi-Color Corporation has grown to become one of the world's largest and most awarded label printers today supporting the world's most prominent brands. In 2016, Multi-Color celebrated its 100th year in business! Today, Multi-Color services our primary market segments around the world through operations in the North American, Latin American, EMEA (Europe, Middle East and Africa) and Asia Pacific regions.

Our Business

Multi-Color Corporation is a global supplier of premium label solutions. We share our knowledge and experience so our customers can benefit from our insights, not only to improve the efficiency in their production, but also to optimize the emotional characteristics of their packaging solutions. Currently, we are operating in 26 countries globally.

- Argentina
- Australia
- Belgium
- Canada
- Chile
- China
- France
- Germany
- Indonesia
- Ireland
- Italy
- Kenya
- Malaysia
- Mexico
- New Zealand
- Philippines
- Poland
- Romania
- South Africa
- Spain
- Switzerland
- Tanzania
- Thailand
- United Kingdom
- United States
- Vietnam



About this Statement

This statement affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations. This Policy also supports the intent of international conventions, treaties, and protocols relevant to combatting modern slavery and the Modern Slavery Act (Cth) 2018. All Multi-Color entities are committed to limiting the risk of slavery occurring within its own business, supply chains and/or through any other business relationship. MCC will only do business with organisations who fully comply with our policy, or those who are taking verifiable steps towards compliance.

Reporting Entities:

- Multi-Color Corporation Australia Pty Ltd (MCC)
- Multi-Color (WA) Pty Ltd
- Multi-Color (QLD) Pty Ltd
- Multi-Color (Griffith) Pty Ltd
- Multi-Color (VIC) Pty Ltd
- Multi-Color (NZ) Pty Ltd

Label Solutions for Every Market



Automotive & Chemicals



Food & Dairy



Beverage



Healthcare



Durables & Technical



Home Care & Laundry



Personal Care & Beauty



Wine & Spirits

Sustainability

We are the signatory of Australian Packaging Covenant Organisation (APCO) which is a not-for-profit organisation leading the development of a circular economy for packaging in Australia. We comply with their packaging value chain that collaborates to keep packaging materials out of landfill and retains the maximum value of the materials, energy and labour within the local economy. APCO works with governments, businesses and other organisations from across Australia's large and complex packaging value chain to develop the insights, resources and programs that are needed to build a sustainable national packaging ecosystem. This includes facilitating the delivery of Australia's 2025 National Packaging Targets, an important step on the pathway to a circular economy.

Environmentally aware label innovations and a comprehensive approach to reducing waste and pollution. Both consumers and companies are seeking ways to lower their carbon footprint, reduce pollution and be responsible citizens of the world. In this section, we present solutions that help our customers increase their products' recyclability, use more sustainable materials and reduce the negative impact on the environment. Customers across many industries are increasingly approaching MCC with questions about sustainability, waste reduction and ways to increase the likelihood that their packaging will be recycled. Our R&D Team makes sure it listens to reclaimers so that our innovations comply with their requirements. MCC also has very strong relationships with international organizations that focus on sustainability and circular economies. Our key focuses are centred around sustainability, waste reduction, recycling and partnerships.



Sedex Membership

Sedex is one of the world's leading ethical trade membership organisation, working with businesses to improve working conditions in global supply chains. They provide an online platform, tools and services to help businesses operate responsibly and sustainably, protect workers and source ethically. Using Sedex enables businesses to work together to better manage their social and environmental performance and improve working conditions throughout the supply chain. Over 60,000 member organisations from over 180 countries use the Sedex platform to exchange data, manage business risk, meet compliance, and drive positive impact on people. MCC's is a Sedex member, and the company reference number is ZC410161148.

Modern Slavery Due Diligence

The Commonwealth Modern Slavery Act 2018 established Australia's national Modern Slavery Annual Reporting requirement. Under the reporting requirement, certain large entities must publish annual Modern Slavery Statements describing their actions to assess and address modern slavery risks. This reporting will help increase business awareness of modern slavery risks and improve transparency across global supply chains.

MCC expects all of its suppliers and their supply chain partners to provide a workplace free from discrimination, harassment or any other form of abuse, and to treat employees and other workers fairly, including with respect to wages, working hours and benefits, in accordance with applicable laws. MCC has a zero-tolerance approach towards any trafficking, forced labour and child labour. Whilst MCC is confident that its business partners adhere to such principles and strive to eliminate any modern slavery practices from its operations and supply chains, MCC is required to comply with the *Australian Modern Slavery Act 2018 (Cth)*. It has therefore implemented a due diligence process, including this questionnaire, which will assist MCC in identifying any modern slavery risks in its supply chain and address such risks appropriately. MCC has performed this due diligence questionnaire survey among topmost suppliers. This Modern Slavery Questionnaire has also been signed by a duly authorised representative of the surveyed organisation.

Identifying Risks of modern Slavery Practices

Modern slavery is a range of serious offences that deprive a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain. An estimated 40.3 million people were victims of modern slavery. Women and girls are disproportionately affected by modern slavery, accounting for 28.7 million, or 71 per cent of the overall total.

Modern Slavery can take many forms, the Modern Slavery Act 2018 covers slavery like practices, including servitude, slavery, forced labour, deceptive recruiting for labour or services, child labour, people trafficking, forced marriage, debt bondage. All forms of modern slavery have in common, the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights. We are constantly reviewing risks to prioritise our efforts where there is greatest impact to people in our operations and supply chain. Modern slavery is defined as serious exploitation and which can be understood as:

- **Servitude**, which is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
- **Slavery**, which is where the offender exercises powers of ownership over the victim.
- **Forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work.
- **Deceptive recruiting for labour or services**, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.
- **The worst forms of child labour**, which involves situations where children are exploited through slavery or similar practices, including for sexual exploitation, or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs.
- **Trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery, or practices similar to slavery, servitude, or the removal of organs.
- **Forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- **Debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

Approach to Limiting the Risk of Modern Slavery Practices

Tackling modern slavery requires all associates of MCC to play a part and remain vigilant to the risk in all aspects of the MCC business and business relationships. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners.

MCC will implement the following measures and will review on a regular basis the measures to abide by this policy: -

- MCC will conduct a risk assessment to determine which parts of the business and which supply chains are most at risk from modern slavery so efforts can be focussed on the areas that are most at risk.
- Where appropriate, as informed by the risk assessment, the Company will engage with suppliers in respect of the Anti-Slavery Policy to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business.
- As part of our contracting or vendor selection processes, we will incorporate specific prohibition against slavery or servitude, forced labour, child labour and people trafficking in line with this policy.
- We also make provision for our contracted suppliers to hold their own suppliers to the same standards.

Compliance with the Anti-Slavery Policy

The MCC Board has overall responsibility for this policy and in ensuring that MCC complies with all legal and ethical obligations. The President Aust/NZ will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place.



This statement meets the requirement approval of the reporting entity and was approved by the principal governing body of Multi-Color Corporation Australia Pty Ltd on 9 September 2021.

All site's General Managers will be responsible for ensuring that their site complies with the provisions of this policy in the day-to-day performance of their roles. Following processes need to be adhered to comply with this policy.

- Each site's General Manager must ensure that employees read, understand, and comply with our policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. All are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- Employees must notify their manager or the Procurement Department as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- Employees are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.
- If employees believe or suspect a breach of this policy has occurred or may occur, they must notify their manager as soon as possible.
- If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of supply chain constitutes any of the various forms of modern slavery, raise it with manager or the Procurement Department.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any part of the supply chain. If employees believe that they have suffered any such treatment, they should inform their manager immediately.

Communication & Awareness of Anti-Slavery Policy

MCC will ensure that relevant employees (e.g., Procurement officers and Production Leaders) will receive adequate training on this policy and any supporting processes applicable to their role. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. This Anti-Slavery policy will be updated from time to time to reflect legal and operational requirements and will be reviewed by the Management team on a regular basis.

Supply Chain Transparency is one of the training courses which is essential component of responsible supply chain management. It tangibly demonstrates to ensure that the suppliers and subcontractors that the company engages with promote favourable human rights and practices. With an increased focus on corporate social responsibility in this context, confronting exploitation in labour and supply chains has become a key issue for every company. This course builds awareness of how human trafficking as well as other components of modern slavery may reveal itself in supply chains and equips sourcing managers with the skills to support the company's efforts to prevent and respond to these activities.



Employee Assistance Program (EAP)

MCC offers Employee Assistance Program (EAP). Converge International's People Assist EAP Program is a holistic, customer-focused and quality-assured service delivered within a contemporary health and wellbeing framework. The People Assist program offers a flexible service model that can be adapted to the changing needs of the workplace environment meeting the needs of all target audiences within the work environment. It provides strategies and support to employees and managers, across the spectrum of personal and work-based issues that have the ability to impact on their effectiveness. A Converge International People Assist program provides short-term and solutions focussed



counselling which aims to support and empower employees and members of their families through a variety of best practice counselling approaches and frameworks to assist in resolving personal and work-based issues.

Counselling approaches used in the People Assist Program and related streams implement the core counselling skills of attending, questioning, paraphrasing, summarising, reflection of content and feeling, and confrontation. Short-term, solutions focussed approaches including Cognitive Behavioural Therapy (CBT), Acceptance and Commitment Therapy and Positive Psychology are supported in conjunction with other therapies as required.

Breaches of Anti-Slavery Policy

Breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with MCC Disciplinary and Termination Policy and Procedures. Serious breach may be regarded as gross misconduct and can lead to immediate dismissal. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. All employees will fully be expected to co-operate in any investigation into suspected breaches of this policy. If any part of this policy is unclear, clarification should be sought from Human Resources department.

Policy Framework

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers that are reviewed regularly. This policy framework ensures that our team members and suppliers clearly understand our expectations, and equally that they can recognise when they are being treated in a way that is inconsistent with these expectations and understand how to raise a grievance or complaint. The following policies are those that are most relevant to preventing, mitigating and remediating risks of modern slavery among our team members and workers in our supply chains:



Policy	Purpose
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Standard of Business Conduct and Code of Ethics	How we expect team members to behave towards each other, our customers and the broader community.
Anti-Slavery Policy	This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.
Equal Opportunity Policy	Ensuring that all persons seeking employment are treated fairly equitably and are not subjected to any form of unlawful discrimination or harassment.
Grievance Policy	Problem can arise at work that may sometimes cause employees to feel aggrieved. An employee who believes something unfair, unjust or upsetting in relation to a work-related matter has options available to address them.
Jury Service Policy	Employees of MCC who are required to attend for jury service, pursuant to the Juries Act 1927, will continue to receive their normal salary, in respect of the ordinary time they attend jury service.
Recruitment and Selection Policy	As MCC is an Equal Opportunity Employer, a standard and consistent approach to the recruitment and selection of employees will be applied in an endeavour to provide every suitably qualified person with an equal opportunity to obtain employment with the company.
Sexual Harassment Policy	MCC is committed to ensure that all current and prospective employees are not subjected to any form of sexual harassment in the workplace.
Work Health, Safety & Welfare Policy	MCC is committed to provide a healthy and safe workplace and to eliminating conditions and incidents, which could result in personal injury or ill health via continual improvement to the WH&S practices of our business.
Workplace Harassment / Bullying Policy	MCC is committed to provide a work environment that is pleasant for employees to work in and that is conducive to good occupational health, safety and welfare, and workplace relations, and ensuring that employees are not subjected to any form of workplace harassment.
Whistle Blower Policy	MCC encourages the reporting of any matters which may be considered unethical, illegal or an act of serious wrongdoing, ('Reportable Conduct'). MCC provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

Reporting Concerns of Modern Slavery

A key part of supporting ethical standards is enabling MCC People and Other People (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that MCC or MCC people are not acting ethically or in accordance with laws and obligations. Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to MCC via the following ways:

- Phone: +61 (0) 8 8405 0500 (within Australia or overseas)



- Email: daren.hudson@mclabel.com
- Post: Multi-Color Corporation Australia Pty Ltd, PO Box 55, Marleston SA 5033 Australia (ATTENTION: Daren Hudson)
- Fax: +61 (0) 8 8405 0570 (ATTENTION: Daren Hudson)



MCC Ethics Hotlines

The Company's reputation and its actions as a legal entity depend on the conduct of its associates, officers and directors. We must each commit to act according to the highest ethical standards and to know and abide by applicable laws. We each must assure that our personal conduct complies with the Code. Difficult as it may be at times, we also each have an obligation to assure that the conduct of those who work around us complies with the Code. The Code will be enforced at all levels fairly and without prejudice.

If you have a question about the Code and its scope and interpretation in any circumstances, whether involving you or someone else, you should not hesitate to ask for clarification or help. Prompt and open discussion of questions and issues will help assure that the Company remains in compliance with the Code. Compliance should facilitate the Company's achievement of its planned business growth, to the advantage of all the present and future associates who will share both in the responsibility for that growth and its rewards.

Hotlines:

- Argentina 0-800-555-0906
- Australia 1-800-339276
- Canada 1-877-309-9263
- Chile 1230-020-5771
- China-Northern 10-800-712-1239
- China-Southern 10-800-120-1239
- France Indonesia 0800-902500 001-803-011-3570 / 007-803-011-0160
- Ireland 1-800-615-403
- Italy Malaysia 800-786907 1-800-80-8641
- Mexico Philippines 001-800-840-7907 / 001-886-737-6850 1-800-1-114-0165
- Poland Spain 00-800-1211571 900-99-0011, at the prompt dial 877-309-9263
- South Africa 080-09-92604
- Switzerland Thailand 0800-562907 001-800-12-0665204
- United Kingdom 0800-032-8483
- United States 1-877-309-9263

Understanding Covid-19 Impacts

COVID-19 has had a significant impact on businesses and workers, particularly vulnerable workers, globally. From the outset of the pandemic, we have been focused on monitoring disruption risks to our supply chain and ensuring safe and secure supply throughout the crisis without placing undue pressure on our existing suppliers. This included:

- Undertaking a detailed analysis on each commodity group to identify critical commodities. Where commodities have been identified as critical, we engaged with our suppliers early to understand the potential impact to supply. Our supply chain strategy has already largely eliminated single source supply in favour of multiple sources of supply for critical components, allowing us to ensure security of supply without adversely impacting suppliers

- Relying largely on existing suppliers to limit the introduction of additional modern slavery risks through new suppliers. Any new suppliers are screened for risk through our standard compliance screening process however no suppliers were 'fast-tracked' through this process as a result of COVID-19
- Ensuring adequate inventory levels at site to make safety stock is available in the event of a disruption and minimise pressure on our suppliers. We also recognised that some of our suppliers may face commercial uncertainties due to the pandemic. Where we were made aware of business challenges, we worked to support our suppliers through a variety of mechanisms, including releasing payment early and reducing payment terms. As part of our ongoing due diligence, we will continue to review the impacts of COVID-19 on our supply chain and work to identify and mitigate increased modern slavery risks, if they arise.

Looking Forward

At MCC we are focused on developing enduring, effective partnerships with organisations and communities to bring to life our purpose - to make your world a safer place. We know it takes time to establish and build trust with our stakeholders and to achieve impact on an issue like Modern Slavery. Addressing Modern Slavery risks is a complex and challenging undertaking and needs to be a process of continuous improvement. Above all, we want to ensure that we continue to have a victim-centred approach in all our activities, along with actionable remediation plans where issues are identified.



Our first Modern Slavery Statement has sought to establish a baseline which we can look to strengthen and refine in future years. Our aim is to continually improve, demonstrating progress from this initial Statement.