

Statement on Modern Slavery & Human Rights 2023

Content

| | |
|--|----|
| 1. Message from Vice President | 2 |
| 2. About this Statement | 3 |
| 3. About MCC | 3 |
| 4. Our Business | 3 |
| 5. MCC Australia and New Zealand Group Structure | 3 |
| 6. Label Solutions for Every Market | 4 |
| 7. Identifying Modern Slavery Practices | 5 |
| 8. Modern Slavery Governance | 5 |
| 9. Sedex Membership | 6 |
| 10. Actions to reduce the Risk of Modern Slavery Practices | 6 |
| 11. MCC ANZ Policies | 8 |
| 12. Identified Modern Slavery Risks | 9 |
| 13. Compliance with the Anti-Slavery Policy | 9 |
| 14. Communication and Awareness of Anti-Slavery | 10 |
| 15. Employee Assistance Program (EPA) | 11 |
| 16. Breaches of Anti-Slavery Policy | 11 |
| 17. Reporting Concerns of Modern Slavery | 11 |
| 18. MCC Ethics Hotlines | 12 |
| 19. Review and approval | 13 |

Message from Vice 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
Vice President/Director Australia/New Zealand
MCC Australia



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About This Statement

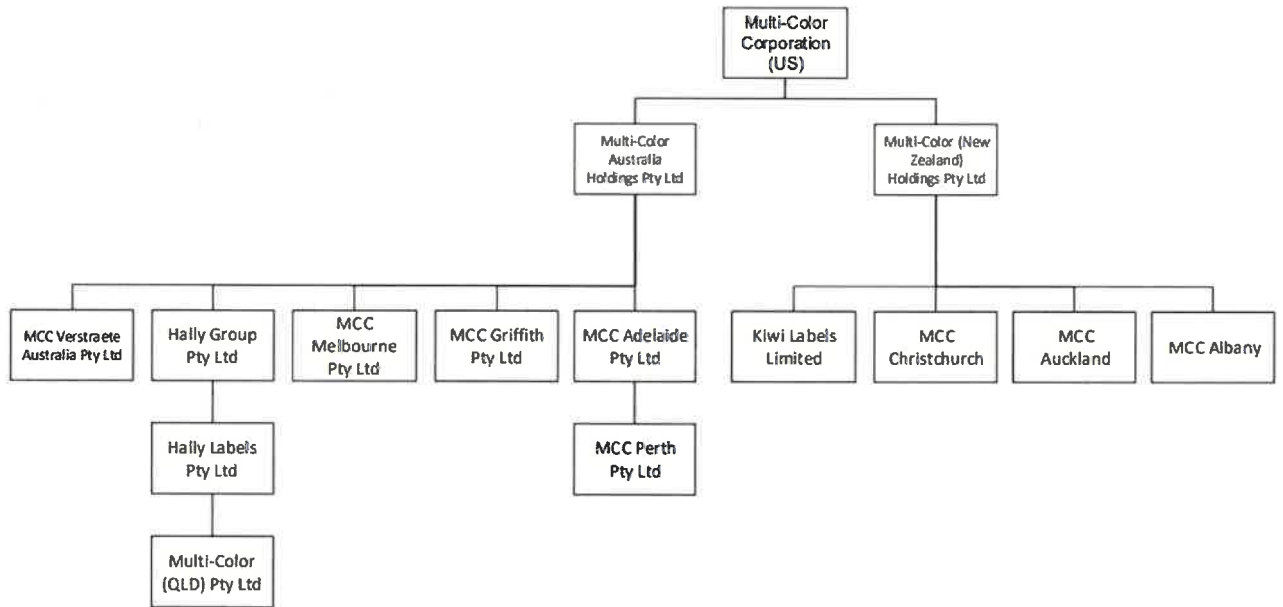
This Modern Slavery Statement (Statement) is made under the Australian Modern Slavery Act 2018 (Cth) (MSA). It sets out the actions taken by Multi-Color Corporation Australia and New Zealand to assess and address modern slavery risks in our operations and supply chains during the year ended 30 June 2023 (FY23). This Statement is a joint Statement on behalf of Multi-Color Corporation and its controlled entities. This includes reporting entities which are wholly owned subsidiaries, as well as other entities over which Multi-Color Corporation has control under the Australian Accounting Standards. This Statement was reviewed by the Australian Group Executive Managers, The VP of Procurement, and the Global Director of Sustainability. It is subsequently endorsed by the Multi-Color Corporation Group Vice President of Australia and New Zealand. This Statement was approved by the Multi-Color Corporation Group Executive Managers on behalf of all reporting entities (acting as a higher entity under section 14(2)(d) (ii) of the MSA) on 27/03/2024 and is signed by the Vice President and Director of Australia and New Zealand, as required by the Australian MSA.

About MCC

MCC is the world's leading provider of premier label solutions. We serve customers in every category of consumer packaged goods, including beverages, wine and spirits, food and dairy, personal care, beauty, home care, healthcare, durables and technical and automotive. Our 12,000 dedicated employees operate at 100 plants in 25 countries on six continents. Established in 1916 and headquartered near Cincinnati, Ohio, MCC has grown to become one of the world's largest and most awarded label printers today supporting the world's most prominent brands. For more information, visit MCCLabel.com.

MCC Australia and New Zealand Group Structure

This statement is a joint statement made by Multi-Color Australia Holdings Pty. Ltd. & Multi-Color (New Zealand) Holdings Pty Ltd as the parent companies of all Multi-Color Australia and New Zealand entities as listed in the reporting entities below. No other MCC Group entity meets the reporting entity criteria under the Australian Modern Slavery Act 2018.



Label Solutions for Every Market



Automotive & Chemicals



Food & Dairy



Beverage



Healthcare



Durables & Technical



Home Care & Laundry



Personal Care & Beauty



Wine & Spirit

Identifying Modern Slavery Practices

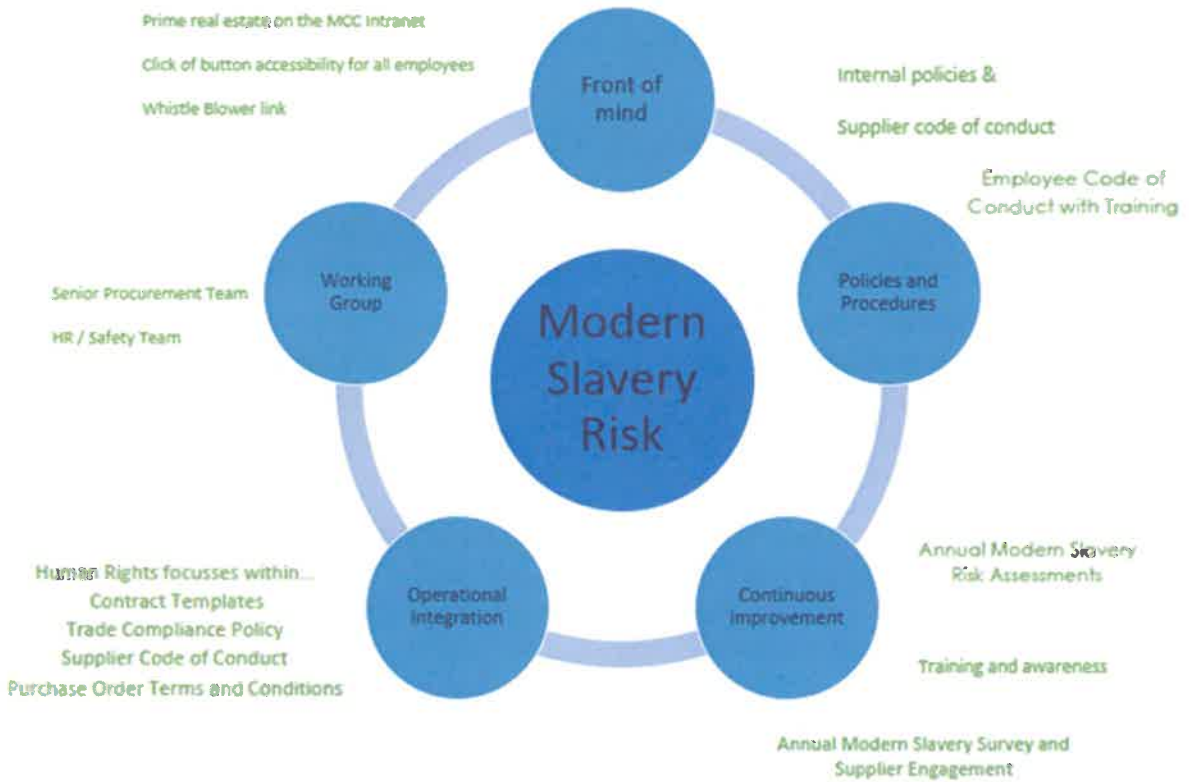
Modern slavery encompasses a range of serious offences that deprive a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain

Modern Slavery can take many forms. 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 under the Modern Slavery Act of 2018 is defined as serious exploitation, and includes:

- **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.

Modern Slavery Governance

MCC contains modern slavery risk by focussing on Corporate Governance and integrating processes into our operations. Our MCC Intranet provides 24-hour access to information on Modern Slavery as well as Policies and Procedures. The Whistle Blower link is also prominent on the intranet and has its own instant click access that provides a safe and anonymous way to report any ethics violations.



Sedex Membership

MCC is a Global Sedex member.

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.

Actions to reduce 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 has implemented the following measures and will review these measures on an annual basis:



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Desktop risk assessment

- Desktop risk assessment on a priority of Suppliers that covering 80% of our direct spend to determine areas in our business and supply chains that are most at risk from modern slavery based on the Global Slavery Index 2018.
- The Desktop risk assessment have highlighted some exposure to Geographic risks, within our supply chain. The resulting supplier risk ratings were reviewed with internal stakeholders including Global Category Managers where relevant, and actively pursued additional actions to ensure correct policies and processes are in place with those suppliers at higher risk.

Supplier Self-Assessment

- Annual Supplier Self-Assessment Questionnaire on Modern Slavery.
- From the risk assessment, the Company engaged with suppliers on corrective action planning in respect to their Anti-Slavery Policy and ensure measures are in place to eliminate risks.
- Through contract obligations, our contracted suppliers are required to abide by MCC's policy on Modern Slavery.
- As part of our contracting or vendor selection processes, we have incorporated specific prohibition against slavery or servitude, forced labour, child labour and people trafficking in line with this policy.

Purchase Order T&C review

- In February 2023 MCC reviewed and updated its MCC Purchase Order Terms and Conditions to ensure a clearly defined zero tolerance expectation of forced and involuntary labour of any kind under the section 24.3 "Compliance with Laws and Integrity" of our PO T&C.

Generating Awareness within the business

- Our Corporate Governance policies are publicly available via the link <https://www.mcclabel.com/en/suppliers-and-ethics>
- We have dedicated a section on the front page of our intranet to modern slavery that is accessible to all employees to educate and stimulate awareness and behaviour.
- Employees can anonymously report on any Ethics violation via a toll-free number and via ethicspoint.com also on the front of our intranet.
- Modern Slavery risk mitigation is part of the topics covered at the Monthly Australia and New Zealand MCC Procurement meetings.

MCC ANZ Policies

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 |
|--|--|
| Global Code of Business Conduct and Ethics | How we expect team members to behave towards each other, our customers and the broader community. |
| Supplier Code of Conduct | Requires suppliers to comply with laws and ethical framework, including forbidding suppliers from using any form of forced or bonded labor, indentured or involuntary prison labor, slavery, or human trafficking. |
| MCC Purchase Order T&C | Supplier agrees it shall not under any circumstances engage in or tolerate any slave or forced labor, child labor, human trafficking, corruption, or discrimination based on age, gender, race, marital status, nationality, religion, or sexual identity or orientation. Supplier also agrees to abide by MCC's Supplier Code of Conduct. |
| 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 | Problems can arise at work that may sometimes cause employees to feel aggrieved. An employee who believes something is 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 Section 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. |

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|-------------------------------------|--|
| <p>Respect at Work</p> | <p>Our Respect at Work Policy promotes a safe, inclusive, and professional workplace by outlining expected respectful behaviours and prohibiting harassment and discrimination. It provides clear procedures for reporting, investigating, and addressing misconduct to ensure a respectful and supportive work environment for all employees.</p> |
| <p>Whistle Blower Policy</p> | <p>MCC encourages the reporting of any matters which may be considered unethical, illegal or an act of serious wrongdoing. 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.</p> |

Identified Modern Slavery Risks

| Domestic Risks | International Risks | Industry and Sector Risks |
|--|---|---|
| <ul style="list-style-type: none"> • For our Australia and New Zealand entities, the majority of our suppliers are based within Australia or New Zealand • According to the Global Slavery Index (GSI) the Domestic Risk is considered low for both Australian and New Zealand’s populations living in Modern Slavery. • There is still some exposure to international risks from of imported contents. | <ul style="list-style-type: none"> • A small number of our suppliers are based internationally • We have identified over 30 origin countries within our supply chains. • We have assessed their varying geographic risks for Modern Slavery • The review showed moderate to low risks based on Geographic content | <ul style="list-style-type: none"> • Forestry/ Reforestation, Wood & Paper in certain countries are of high risk of modern slavery however sourcing from our suppliers are in Geographical areas with low to moderate risk • Service Labour Hires such as cleaning and security are utilised at MCC and are an industry of risk for modern slavery concerns. • Annual Self-assessment questionnaire scorecards will highlight any risks in this sector |

Compliance with the Anti-Slavery Policy

The MCC Board has overall responsibility for this policy and for ensuring that MCC complies with all legal and ethical obligations. The Vice 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.

Each of MCC’s site’s Plant Managers will be responsible for ensuring that their site complies with the provisions of this policy. The following processes shall be adhered to in order to comply with this policy.



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- Each site's PlantManager must ensure that employees read, understand, and comply with our policy pertaining to modern slavery.
- 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, they should 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. 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 or use the available anonymous hotlines.

Communication & Awareness of Anti-Slavery Policy

MCC has incorporated into our intranet a dedicated Modern Slavery page accessible to all employees.

The Modern Slavery intranet communication includes our Modern Slavery Statement, our Anti-Slavery Policy and the whistle blower hotline as well as other key activities around our risk mitigation activities.

The Regional Procurement Team will continue to monitor the progress on Modern Slavery risk mitigation activities.

MCC will ensure that relevant employees (e.g., Procurement officers and Production Leaders) will continue to 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. Suppliers are required to conform to MCC's Supplier Code of Conduct which forbids suppliers from using slavery and bonded labor. 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.

Employee Assistance Program (EAP)

MCC offers an 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 for personal and work-based issues to employees and managers and may have a positive 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 programs 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 be expected to fully co-operate in any investigation into suspected breaches of this policy. If any part of this policy is unclear, MCC’s Human Resources department can provide clarification.

Reporting Concerns of Modern Slavery

A key part of supporting ethical standards is enabling MCC personnel and others (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that MCC or MCC personnel 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@mcclabel.com
- Post: Multi-Color Corporation Australia Pty Ltd, PO Box 55, Marlestone SA 5033 Australia (ATTENTION: Daren Hudson)
- Or anonymously via 1-800-339276 and via www.ethicspoint.com (link also provided on the MCC intranet)



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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 commit to act according to the highest ethical standards and to know and abide by applicable laws. We have an obligation to assure that the conduct of those who work around us complies with the law. The law and MCC policy is enforced at all levels fairly and without prejudice. If any MCC personnel has any question about any company policy and its scope and interpretation in any circumstances they should ask for clarification or help. Prompt and open discussion of questions and issues will help assure that MCC remains in compliance with applicable law. Compliance should facilitate MCC'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.

Review and Approval

At MCC we are focused on developing enduring, effective partnerships with organisations and communities to bring to life our purpose - to make our 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.

In accordance with Section 14 of Modern Slavery Act 2018, it is confirmed that the statements given by reporting entities included in this “Modern Slavery Statement for Multi-Color Corporation in Australia and New Zealand” have been reviewed and approved by the principal governing body of each Australian entity as well as the MCC Executive Team on 27th June 2024.

Signed:



Daren Hudson
Vice President Australian & New Zealand
Date: 19th June 2024

