

Global Code of Business Conduct and Ethics

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2026 UPDATE



Dear **MCC teammate,**

At MCC, the way we work matters just as much as the results we deliver. Our Code of Conduct sets the expectations that guide every decision we make — across every site, every function, and every customer interaction. It reflects our commitment to doing business the right way, every time.

This updated Code is closely aligned with our True Colors, behaviors that define what it means to be part of MCC.

You'll see these principles reflected throughout the Code — in how we treat colleagues and partners, safeguard MCC's assets and financial health, protect our communities, and represent our company with professionalism. These standards aren't optional; they are essential to maintaining MCC's reputation as the world's most trusted label solutions provider.

You may be asked periodically to acknowledge that you have received, reviewed, understand and will comply with the Code. Your commitment to these expectations, and to living our True Colors every day, strengthens MCC and the work we do together.

Thank you for your passion and dedication.

Hassan Rmaile

Hassan Rmaile,
President & CEO

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Please be aware that not all links are active for all viewers, as some are restricted to MCC employees.

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SECTION 1

Purpose and Applicability

Our Global Code of Business Conduct and Ethics (the "Code") sets forth standards of conduct required of every employee, officer, and director of Multi-Color Corporation and its subsidiaries and affiliates worldwide ("MCC" or the "Company"). It provides general guidance for employees worldwide on how to carry out our daily activities in accordance with our values, applicable laws and policies, and the principles of ethical decision making. Employees are encouraged to consider not only what is legal and compliant, but also what is right and responsible, especially when facing complex or ambiguous situations. By applying ethical decision making, we ensure our actions reflect MCC's commitment to integrity, respect, and accountability in all aspects of our work.

No code of conduct can address every situation or circumstance that may arise. Employees are expected to use good judgment and seek guidance when faced with questions or situations not specifically covered by this Code.

WHO MUST FOLLOW OUR CODE?

All members of the MCC organization—including but not limited to employees, officers, and directors—must familiarize themselves with the principles and guidelines contained in the Code and are expected to conduct their activities on behalf of MCC in accordance with the Code. A copy of the Code is available on MCC's website at www.mcclabel.com. We expect our business partners to hold themselves to similar standards when acting on MCC's behalf.

Additional Responsibilities of Managers and Supervisors

All managers, supervisors and leaders are expected to ensure their employees are aware of and understand the Code, as well as serve as ethical role models by:

- Encouraging ethical decision-making
- Rewarding integrity
- Encouraging employees to speak up when they see actions that are unsafe, unethical or illegal
- Creating a respectful and inclusive work environment
- Assisting employees in understanding our values and completing proper training as needed

Speak-Up Culture

All employees have an obligation to uphold MCC's values. If you observe or suspect misconduct that is unsafe, unethical or illegal, you are expected to "Speak Up," which allows MCC to deal with issues promptly and responsibly. Speaking Up is an essential way for MCC to maintain its reputation and success. For more information on how to Speak Up, see Section 13, "Asking Questions and Raising Concerns".

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True Colors

At MCC, our values are expressed through our **True Colors: behaviors that define our culture and our commitment to our customers and one another.**

Customer Focus

Meeting & exceeding customers' needs

- Putting the customer at the center of decision-making
- Seeking stakeholder engagement and input
- Being attentive to new opportunities
- Adjusting to changing requirements

Accountability

Following through on our promises

- Holding self and others to high standards
- Taking initiative to get things done
- Owning mistakes, using them as a learning opportunity
- Thinking and acting like an owner

Innovation

Continuously striving for new and better

- Challenging the status quo
- Demonstrating curiosity
- Discovering and pursuing new opportunities
- Creating a safe environment for both success and failure

Drive for Results

Relentless focus on achievement

- Bringing a sense of urgency and responsiveness to work
- Prioritizing effectively
- Making data-driven decisions
- Persevering despite challenges

Team Player

Collaborating and having each other's backs

- Behaving ethically
- Communicating in a timely and appropriate manner
- Showing respectful courage—kindness, respect, and humility
- Promoting an inclusive environment for all

Legal Compliance

As a global company, MCC must operate in strict compliance with all laws and regulations applicable to MCC's activities around the world. Because Multi-Color Corporation is a U.S. corporation, U.S. law may apply to MCC conduct that occurs outside of the U.S. If compliance with the Code or U.S. law appears to conflict with local laws, or if you are unclear about which laws apply to your activities, **please contact MCC's Legal Department at legal@mcclabel.com.**

Our Workplace and Our People

Respect for the Individual

MCC's policy is to provide equal employment opportunities for all applicants and employees. Unlawful discrimination in the hiring, promotion, compensation or retention of employees is strictly prohibited. MCC does not tolerate harassment of our employees based on personal characteristics protected by law such as race, sex, age, national origin, disability, religion, veteran status, pregnancy, citizenship, gender, or marital status. Harassment, including sexual harassment of employees, is strictly prohibited. Retaliation against any employee who, in good faith, reports harassment or assists in investigating complaints of harassment is prohibited. See Section 13, "Asking Questions and Raising Concerns" to report any suspected harassment or retaliation.

Beyond complying with local anti-discrimination laws, we respect internationally recognized human rights. This includes providing fair and lawful working conditions, prohibiting any form of forced or child labour, and respecting employees' freedom of association and collective bargaining rights, consistent with applicable laws. Further guidance is provided in our Global Labor & Human Rights Policy and related training.

MCC strictly prohibits all forms of human trafficking and child labor in its operations and expects the same commitment from all business partners.

SCENARIO 1

You observe a manager making inappropriate comments about a teammate's appearance and repeatedly suggesting they meet outside of work for drinks.

WHAT'S WRONG

- Sexual harassment violates MCC policy, creates a hostile work environment, and is illegal.

WHAT TO DO

- **Report immediately:** Notify your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).
- **Document facts:** Record dates, times, what was said, and any witnesses.
- **Do not confront** the harasser unless you feel safe and prepared.

REMEMBER

MCC prohibits retaliation against anyone who raises a good-faith concern or participates in an investigation.

If you experience or observe retaliation, report it immediately to the Legal Department (legal@mcclabel.com) or the Ethics Line.

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Our Workplace and Our People

Health and Safety

The personal safety and health of each MCC employee is of primary importance. MCC is committed to ensuring that its work environments meet the highest standards in protecting the health and safety of MCC's employees, customers, suppliers, and guests. Every MCC employee is responsible for maintaining a safe and healthy work environment and for following all applicable safety-related laws, rules, regulations and practices, and to report any noncompliance immediately to MCC management, MCC's Legal Department, or to seek guidance as described in Section 13, "Asking Questions and Raising Concerns".

We view health and safety broadly, covering both physical safety and mental wellbeing. Leaders at all levels are expected to promote a strong safety culture, support regular risk assessments, and ensure their teams complete required health and safety training. Our global health and safety policies and procedures provide further detail on how we implement these commitments in practice.

MCC prohibits the sale, use, possession or being under the influence of alcohol, illegal drugs or controlled substances by employees while performing work duties, while using MCC vehicles or when using personal vehicles in the course of conducting business for MCC. Employees who have been prescribed medication by a treating physician that may impact their ability to safely perform their jobs should advise HR of this fact.

SCENARIO 2

While visiting a production area, you notice chemical containers stored without proper labeling and some employees working without protective gear.

WHAT'S WRONG

- This may violate MCC's health and safety standards and could put employees at risk.

WHAT TO DO

- **Speak up:** Notify your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).
- **Provide as much detail** as possible—location, date, what you observed.



REMEMBER

Reporting concerns about safety, substance abuse, harassment, or any legal/policy violations helps protect everyone and MCC's reputation. You are required to report any suspected or any concerns regarding safety.

SECTION 4

Environment and Sustainability

Environmental Laws

MCC is committed to complying with all environmental laws, rules and regulations applicable to it. Every MCC employee must abide by all environmental laws, rules, regulations, policies and procedures applicable to their respective MCC facility. All noncompliance must be reported immediately to MCC management and/or the Legal Department as described in Section 13, "Asking Questions and Raising Concerns". MCC will take appropriate remedial action and ensure that timely notification is made to government agencies as required by applicable law.



Sustainability

At MCC, we "label with care" because we believe in creating a sustainable future for our employees, our environment, and our customers. To achieve this, we:

- Prioritize the health and well-being of our employees by providing a safe and inclusive work environment;
- Commit to reduce waste, conserve resources, improve our energy efficiency and increase the use of renewable energy, where possible; and
- Offer label solutions that support recyclability, circularity and our customers' sustainability goals.

MCC is dedicated to continuous improvement and is committed to minimizing our environmental footprint, while providing high-quality products and services to our customers.

We set targets and regularly measure our environmental performance, including greenhouse gas emissions, in line with our Climate Transition Plan and other sustainability commitments. Further information is available in our public sustainability disclosures.

This Code summarises our key principles at a high level. Our global policies, procedures and training programmes provide more detailed guidance on how these principles are implemented in practice across MCC.

SECTION 5

Ethical Business Conduct

Conflicts of Interest

A conflict of interest occurs whenever there is a possibility of direct or indirect personal gain for you or a family member that could influence your judgment or actions in the conduct of MCC's business. It is every employee's responsibility to avoid conflicts between the interests of MCC and the employee's personal interests. The following are examples of conflicts of interest:

- Competing with MCC in another business venture
- Owning or investing in a competitor, supplier, or customer of MCC (other than a passive investor in a public company)
- Employment or activities which could have a negative effect upon the performance of your job or conflict with your obligations to MCC
- Using MCC confidential information or other MCC assets for personal gain

The list above does not include all examples of conflicts of interest. Any situation that is a conflict of interest or could be perceived as one must be promptly and fully disclosed to your supervisor. For more guidance, see our policy section or Section 13, "Asking Questions and Raising Concerns".

SCENARIO 3

You're on the procurement team running an RFP for a large paper supply contract. One of the bidders is a company you co-own (or a family member works for).

WHAT'S WRONG

- This creates a conflict of interest that could compromise—or appear to compromise—your independence and the integrity of the RFP.

WHAT TO DO

- **Disclose immediately** to your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).
- **Recuse yourself** from all decision-making, communications, and access to non-public RFP information related to this bid.
- **Ensure** the RFP continues under neutral oversight and that all bidders are treated equally.
- **Do not share** any inside information with the conflicted company or related individuals.



REMEMBER

Even the appearance of favoritism can damage trust. When in doubt, disclose and recuse to protect the fairness and integrity of MCC's procurement process.

Gifts, Gratuities and Entertainment

MCC employees must be cautious about and comply with applicable laws relating to the offering, giving or receiving gifts or entertainment from vendors, customers, or other third parties. While the exchange of some business courtesies — such as payment for lunch or dinner in connection with business meetings—may be acceptable, others could create an actual or perceived influence on business decisions. You may not offer, solicit or accept a gift of money or non-monetary gifts, gratuities, entertainment or other personal benefits from suppliers, customers, or other third parties with which MCC does business. The only exceptions are gifts of nominal value and primarily of a promotional or advertising nature.

No MCC employee shall directly or indirectly accept from or offer to any person or organization any bribes, favors or "kickbacks" as a condition to past, present or future business relationships. In some countries, it is customary for suppliers or customers to give gifts of more than nominal value to representatives of companies with which they deal. In such cases, you should report the gift to the Legal Department who will advise you whether you may keep the gift, return it or turn the gift over to the Company. Any employee purchasing goods or services on behalf of the Company must comply with the Company's Supplier Gifts and Entertainment Policy.

SCENARIO 4

You're working with an outside sales agent on a major account. The agent suggests inviting the customer to an all-expenses-paid weekend at a luxury resort, including private concerts and spa treatments.

WHAT'S WRONG

- Lavish entertainment can appear as a business inducement, compromise judgment, and damage MCC's reputation if disclosed.

WHAT TO DO

- **Do not approve or participate** in entertainment that is extravagant or unrelated to business.
- **Ensure** any entertainment is reasonable, modest, and clearly for legitimate business purposes.
- **If unsure, consult** your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).



REMEMBER

Entertainment should never influence decisions or create embarrassment if made public.

No gift or entertainment shall ever be offered, given, provided or accepted by any MCC employee or family member of an employee, unless:

- It is not a cash gift
- It is consistent with customary business practices
- It is reasonable in value
- It cannot be construed as a bribe or payoff
- The public disclosure of the gift or entertainment could not reasonably be expected to cause embarrassment to or otherwise damage the reputation of MCC
- It does not violate any laws, regulations or applicable policies of the other party's organization

For more guidance, see Section 13, **"Asking Questions and Raising Concerns."**

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Business with Governments

Relationships with government representatives are governed by additional and very strict laws and regulations. Unless approved in advance by MCC's Legal Department, MCC employees shall not provide, directly or indirectly, any payment, gift or entertainment to any government official.

Foreign Corrupt Practice Act, UK Bribery Act, and Similar Laws

The Foreign Corrupt Practices Act (FCPA) and other U.S. laws prohibit the payment of any money or anything of value to a foreign official, foreign political party or any candidate for foreign political office for purposes of obtaining, retaining or directing business, or gaining a political or legal advantage or benefit. In addition, the U.K. Bribery Act extends beyond the public sector and prohibits the payment of any money or anything of value to any individual in the public or private sector for the purpose of obtaining, retaining or directing business. The U.K. Bribery Act also prohibits the request for a bribe as well as the payment. In addition, many countries outside of the U.S. and U.K. have anti-bribery and corruption laws that prohibit bribery in any form. All MCC employees must comply with all anti-bribery and corruption laws applicable to the location in which they work, including but not limited to, the FCPA. In addition, all MCC employees must comply with MCC anti-corruption policies and procedures applicable to the employee's role and location.

Anti-bribery and corruption laws are complex and far-reaching and have significant penalties including fines and imprisonment for companies and individuals found to be in violation. For questions regarding compliance, contact the Legal Department or seek guidance as described in Section 13, "Asking Questions and Raising Concerns".

SCENARIO 5

You're waiting for water service at a new MCC facility. A city representative says the application will be delayed unless you pay her directly—no official receipt or fee schedule provided.

WHAT'S WRONG

- This is a bribe/facilitation payment, which MCC strictly prohibits.

WHAT TO DO

- **Do not** pay or offer anything of value.
- **Request** the official process and documentation.
- **Report immediately** to your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).



REMEMBER

All payments to government agencies must be through official, documented channels—never to individuals.

Anti-Money Laundering

MCC conducts business only with reputable customers, suppliers and other business partners involved in legitimate activities and using funds from legitimate sources. MCC strictly prohibits any activity that may involve or facilitate money laundering or the financing of terrorism.

Competitive Practices

Every MCC employee must act honestly and with integrity in all business relationships and must comply with all applicable laws protecting competition, such as antitrust laws. Antitrust laws of the U.S. and other countries create complex legal obligations which affect many activities and decisions of the Company, the violation of which can carry heavy fines and even criminal prosecution. Certain kinds of transactions or practices are prohibited under these laws. For example, no agreements or understandings may be made with competitors to fix or control prices; to allocate products, markets or territory; to boycott certain customers or suppliers; or to refrain from or limit the manufacture, sale or production of any product.

The provisions of competition laws apply to both formal and informal communications. It is MCC's policy to strictly comply with all applicable competition laws of all countries in which MCC does business.

Further, no MCC employee shall engage in illegal or improper acts to acquire a competitor's trade secrets, customer lists, information about customer facilities, technical developments or operations. MCC will not hire competitors' associates for the purpose of obtaining confidential information or urge competitors' employees, customers or suppliers to disclose confidential information, nor shall MCC seek such information from competitors or associates subsequently hired by the Company.

Laws governing competitive practices are complex. If your work brings you into contact with customers, competitors or suppliers regularly, or if you are involved in trade associations where participation involves opportunities for communications among competitors, customer and suppliers, you have an obligation to become familiar with antitrust compliance and to consult with MCC's Legal Department or seek advice as described in Section 13, "Asking Questions and Raising Concerns".

SCENARIO 6

You're at an industry trade association meeting. A competitor's employee casually offers to share their customer list and pricing strategy, saying, "It could help both of us."

WHAT'S WRONG

- Accepting or seeking a competitor's confidential information violates MCC policy and antitrust laws. It can lead to severe legal and reputational consequences.

WHAT TO DO

- **Refuse immediately** and make it clear MCC does not engage in such practices.
- **Do not** solicit or accept trade secrets, customer lists, or technical data from competitors or their employees.
- **If you are approached or receive such information, report it promptly** to your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).
- **When in doubt** about antitrust compliance, consult the Legal Department before proceeding.

REMEMBER

MCC will never hire competitors' employees or pressure suppliers/customers to disclose confidential information for competitive advantage. Always maintain fair and lawful business practices.

Imports and Exports

It is MCC's policy to comply with all applicable laws and regulations governing the entry or exportation of goods into or from the U.S. or any other country. No MCC employee shall take any action to improperly evade any custom tariff, duty or other applicable requirements regarding the importation or exportation of goods.

Export and import control and sanction laws give countries legal control over the sale, purchase, shipment and electronic transfer or disclosure of information, software, and goods and services going across national borders. All members of the MCC organization, both U.S. based and non-U.S. based, must be aware of applicable export and import controls and sanctions and must comply with all such laws that are applicable to MCC's business.

Before transferring items to another country, performing services in another country, or receiving items from another country, you must understand and observe the import and export restrictions on those goods or services. In addition, controls and sanctions (including embargoes) can be imposed against countries, entities, individuals and goods, which may restrict the way MCC does business. If you have any questions or are unsure about compliance with import or export laws or sanctions, contact MCC's Trade Compliance Manager, MCC's Legal Department, or seek guidance as described in Section 13, "Asking Questions and Raising Concerns".



SECTION 6

Company Assets and Resources

Confidentiality of Company Information

MCC employees are exposed to information which is the confidential and/or proprietary property of MCC. This includes, but is not limited to, information about manufacturing methods or processes; technical product information, marketing or new product plans; customer and supplier information; price schedules; financial and operating data; quality control information; sensitive internal communications and policies; information about employees, merger or acquisition plans; and trade secrets and other information. MCC employees must maintain all such information in complete confidence both while employed by the Company and after employment with MCC ends, and must disclose such information only to others at the Company who have the clear right and need to know the information in order to perform their jobs.

MCC employees may not disclose Company confidential information to anyone outside the Company without prior authorization, unless it is legally compelled to be disclosed as part of a lawsuit or legal investigation, and may not use Company confidential information for personal gain. Confidential information obtained at work should not be discussed with family, business or social acquaintances. It is the Company's practice to request that new employees sign agreements confirming their obligation of confidentiality, but this confidentiality obligation exists whether or not any such agreement is signed. Insider trading—using or sharing non-public, material information to buy, sell, or recommend securities—is strictly prohibited. This applies both to personal trading and when third parties trade based on information you provide. Confidential business events, mergers, or financial results must never be disclosed for anyone's financial gain.

SCENARIO 7

You're at an airport café on the way to a customer meeting. A colleague calls, and you begin discussing pricing, contract terms, and the customer's name on speakerphone. People at nearby tables can overhear.

WHAT'S WRONG

- Public conversations can expose MCC confidential information (pricing, contracts, customer identities), risking competitive harm and policy violations.

WHAT TO DO

- **Move** to a private area or call back later; avoid speakerphone in public.
- **Do not share** specifics (names, pricing, terms) in open, unsecured settings.
- **Use secure channels** (company devices, approved collaboration tools) for sensitive discussions.
- **If you believe information was exposed, notify** your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).



REMEMBER

Treat all MCC and customer information as confidential—avoid discussing it in public places, on unsecured networks, or on personal/social platforms.

Computers, Software and Other Communication Equipment

Many MCC employees use company-owned or personal computers, cellphones and other communications equipment. All Company equipment — together with all MCC-purchased or authorized software that runs on Company or personal equipment and the data stored on such equipment or on the Company's network (for example, word processing documents, spreadsheets, databases and analyses, etc.)—are the property of MCC and must not be disclosed, duplicated, distributed or altered except in the normal and authorized course of Company business. No MCC employee shall use Company-owned or personal equipment or facilities used for Company business to duplicate or distribute software in any manner inconsistent with the manufacturer's license agreement. Unlicensed software must not be used on Company-owned equipment. All MCC employees must comply with Company policies regarding the use of MCC owned computers and other communications equipment and all personal equipment used for Company business.

MCC implements the most appropriate technical and organizational measures at Group level. To help protect MCC systems and data, employees are expected to follow MCC information security policies and guidance.

The use of artificial intelligence (AI) tools and systems is strictly limited to those expressly approved by MCC and used in accordance with MCC's applicable AI policies.

AI tools can support our work, but they do not replace human judgment. Employees remain responsible for reviewing and verifying the accuracy, completeness and appropriateness of any AI-generated output before using it in MCC materials, communications or decisions.

SCENARIO 8

You leave your company laptop in your car while running errands. When you return, the car has been broken into and the laptop is gone.

WHAT'S WRONG

- The laptop may contain MCC confidential information (customer data, pricing, contracts). Losing it without proper safeguards can lead to data breaches and reputational harm.

WHAT TO DO

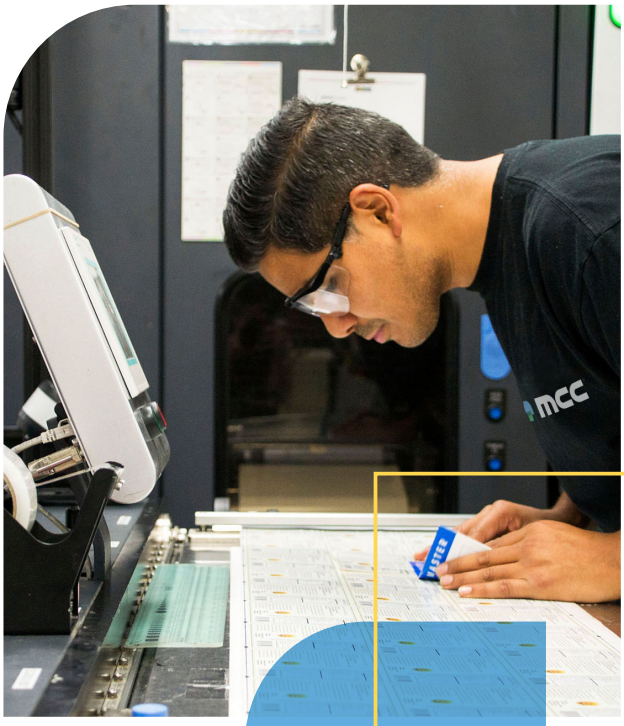
- **Report** the theft immediately to IT and your manager.
- **Notify** the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).
- **Cooperate** with IT to initiate remote wipe and security protocols.



REMEMBER

Always secure company devices—never leave them unattended in vehicles or public places. Use encryption and strong passwords to protect MCC information.

SECTION 6 // **COMPANY ASSETS AND RESOURCES**



Company Resources

MCC employees have a responsibility to protect Company assets from misuse, fraud and theft. No MCC employee may take or improperly use Company assets or permit others to do so without the prior authorization of MCC management. All MCC assets must be used for legitimate MCC business.

Corporate Opportunities

MCC employees are prohibited from taking for themselves opportunities that are discovered through use of MCC property, information or their position without the consent of the employee's supervisor or MCC's Legal Department. No MCC employee shall use MCC's property, information or position for personal gain without the prior written approval of MCC's Legal Department.

Quality Products

MCC strives to provide products and services that meet or exceed our customers' requirements for quality, reliability and value. It is MCC's policy to comply with all applicable laws and regulations and internal control procedures relating to quality standards.



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SECTION 8

Books and Records

The Company's policy is to comply with all laws and regulations regarding the retention of records. The integrity of the Company's accounting and financial records is based on the accuracy and completeness of the basic information supporting entries to the Company's books of accounts. Every accounting or financial entry should reflect exactly what is described by the supporting information. Payments may be made only for legitimate business purposes. No corporate funds or assets should be used for any unlawful or improper purpose. It is every employee's responsibility to ensure that MCC books, records and reports are complete and accurate. Non-compliance with this policy must be reported immediately. This responsibility covers not only financial information, but also non-financial data such as health and safety, environmental and other sustainability information that may be used in our internal reporting and external disclosures.

SCENARIO 9

A manager asks you to pay a vendor in cash and "don't worry about recording it —it's just easier this way." No invoice or documentation is provided.

WHAT'S WRONG

- Undisclosed or unrecorded payments violate MCC policy and may break the law.

WHAT TO DO

- **Do not** make the payment without proper documentation.
- **Ensure** all transactions are recorded accurately and completely.
- **Report** the request to your manager or HR. If you are not comfortable, contact the Legal Department (legal@mcclabel.com) or the Ethics Line (confidential, anonymous (if desired), secure, available 24/7).



REMEMBER

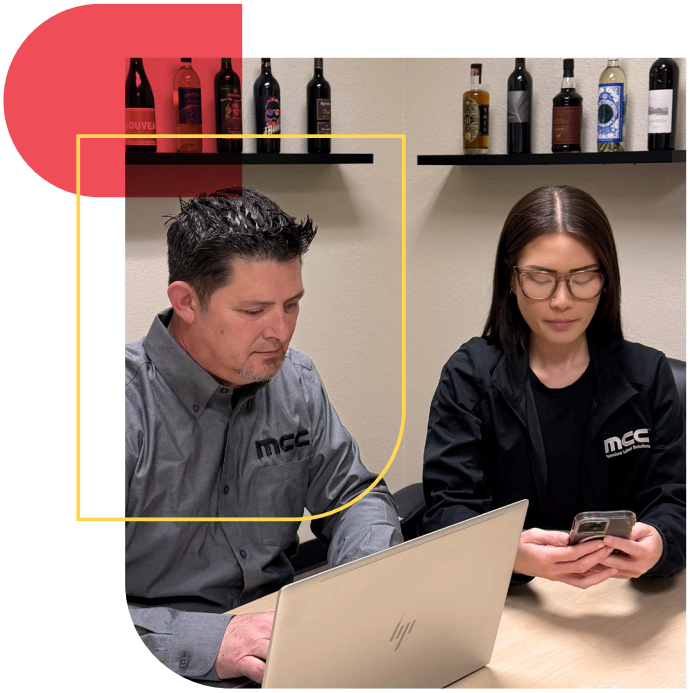
All MCC records must be transparent, detailed, and follow accounting standards.

SECTION 9

Data Privacy

In the course of business, MCC may collect, use, store, hold, share or otherwise process personal information about MCC employees, business partners and others. 'Personal data' means any information that identifies, or can reasonably be linked to, an identified or identifiable person. MCC understands that the handling of personal data is subject to privacy regulations. For more information on how MCC collects, uses and protects personal data, see our MCC Data Protection Privacy Program Overview and any applicable local privacy notices. Relevant information privacy notices are published on MCC website and/or are provided to data subjects in the course of their contractual relationship with MCC.

For any questions or further information regarding privacy, please contact us through the web form available at the following link: Privacy Contact – MCC Privacy



SECTION 10

Political Activity and Social Media

It is MCC's policy to follow all laws governing corporate political activities, lobbying and contributions. These laws vary around the globe. For this reason, only designated MCC employees are authorized to engage in efforts to discuss legislation or government policy with political officials on behalf of the Company. When you participate in the political process, you may only do so using your own money, time and resources, and you must make every effort to ensure that they do not create the impression that they speak or act on behalf of MCC.

Employees must use social media responsibly and never share confidential or proprietary information about MCC or its business partners. Personal posts should not give the impression of speaking on behalf of MCC unless authorized. All online activity must comply with MCC's Social Media Policy and uphold the company's reputation.

SECTION 11

Media Inquiries

Providing clear and accurate information to the media and the general public maintains MCC's integrity in its relationships with the public. Requests for financial or business information about the Company from the media, financial community or public must be referred to MCC's Chief Executive Officer or Chief Financial Officer. Employees are not authorized to provide MCC financial or business information to the media, financial community or general public without the prior authorization of MCC senior management.



SECTION 12

Non-Compliance and Acknowledgements

Violations of Code

Violations of the Code may result in disciplinary action, up to and including termination of employment, and depending on the violation involved may result in civil or criminal action against the employee. Others involved in the wrongdoing besides the violator may also receive disciplinary action. These include employees who fail to use reasonable care to detect a violation; employees who withhold or misrepresent material information that has been requested with regard to a violation; and employees in supervisory capacities who approve or condone a violation or attempt to retaliate in any way against a person reporting a violation or providing related information or assistance.

Acknowledgement

MCC employees, officers, and directors will be asked to acknowledge their commitment to the Code periodically. Newly hired employees are required to acknowledge their commitment to the Code prior to or immediately following commencement of employment. Any independent third party retained to do work or represent MCC's interests may be asked to acknowledge the principles and policies in the Code that are applicable to their work.

SECTION 13

Asking Questions and Raising Concerns

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.

Every MCC employee, director and officer is expected to understand and comply with the Code. This includes an obligation for each person to report dishonest or illegal activities by others. MCC has designated certain employees to assist in resolving or addressing questions regarding the interpretation and application of the Code, as follows.

MCC's Open Door Policy

Consistent with MCC's open-door policy, you should bring questions or concerns to your direct supervisor or department manager whenever possible.

This is often the most efficient and straightforward way to resolve issues. If approaching your supervisor is not appropriate—because the person is involved, or there is a conflict of interest, or you are uncomfortable, HR can assist.

You may also contact MCC's Legal Department directly for actual or suspected violations of law or Company policy, or for questions involving compliance or Company policies—such as conflicts of interest, gifts and entertainment, or other legal- or compliance-related matters:

Multi-Color Corporation
Chief Legal Officer
3284 Northside Parkway NW
Suite #400
Atlanta, Georgia 30327
Email: legal@mcclabel.com

Ethics Line

If you cannot raise a concern with your supervisor, manager, or HR—or you are uncomfortable doing so—you may use MCC's Ethics Line.

It is operated by an independent third party, is available 24/7, and allows for confidential or anonymous reporting.

The Ethics Line is not intended for routine HR or workplace matters, such as time-off questions, scheduling issues, interpersonal conflicts, or general complaints about the company. These should be handled by your supervisor, manager, or HR.

USE THE ETHICS LINE FOR:

- Actual or suspected violations of law or Company policy
- Misconduct or unethical behavior
- Situations where internal reporting is not appropriate

Non-Retaliation and False Reports

MCC is committed to providing workplace conditions that allow employees to report concerns and raise issues without fear of retaliation.

Retaliation will not be tolerated against a person who reports in good faith a violation of the Code or applicable law, raises compliance questions or issues, or cooperates in an investigation of a potential violation. Any retaliation is a serious offense and will result in disciplinary action, which may include termination of employment.

Raising concerns or making reports that are knowingly false or made in bad faith is strictly prohibited and may result in disciplinary action, which may include termination of employment.

REMEMBER:

When in doubt, speak up.

Your voice strengthens MCC.



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