



About FDC and MCC

MCC is a leading global provider of label solutions supporting a number of the world's most prominent brands including leading producers of automotive & chemicals, beverage, durables & technical, food & dairy, healthcare, home care & laundry, personal care & beauty and wine & spirits products. MCC serves national and international brand owners in the Americas (including Canada), Europe, Middle East, Africa and Asia-Pacific regions with a comprehensive range of the latest label technologies including, but not limited to, pressure sensitive, cut and stack, roll-fed, in-mold, shrink sleeve, and heat transfer, as well as other label solutions such as folding carton, tube wraps and aluminum labels. MCC has over 12,000 employees in over 30 countries.

As a wholly-owned subsidiary of MCC, FD Canada's procurement and compliance functions are part of a larger, global operation. As such, this report focuses on actions taken by MCC that are applicable to FD Canada as part of MCC's global programs.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

At MCC, we take ethics and compliance very seriously. Our core values are integrity, passion, creativity, perseverance, and achievement. We are 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 established policies and processes to prevent and reduce the risks of forced labour and child labour in our operations and supply chains, as described in this report. These policies and procedures apply enterprise-wide and support our commitment to upholding human rights. Our commitment is supported by an internal enterprise risk management (ERM) process that is designed to highlight risks in our business, including those in our supply chain, among other areas.

In addition:

- We report through Ecovadis, a third-party platform, for supplier sustainability assessments on labour and human rights as well as environment, ethics and sustainable procurement.

About This Statement

This report is made by FD Alpha Canada Acquisition, Inc. ("**FD Canada**"), a company formed and existing under the laws of Canada and wholly-owned indirect subsidiary of Multi-Color Corporation, an Ohio corporation ("**MCC**"), pursuant to subsection 11(2) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C., 2023, c.9 (the "**Act**"). This report has been prepared on behalf of FD Canada, and as required by the Act, this report summarizes the steps that we have taken in the financial year ended December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step of the importation, production, sale or distribution of goods in Canada by FD Canada.



- As part of our sustainability program, we are committed to the United Nations Global Compact.
- In 2023, we initiated a double-materiality assessment through a third party to assist in identifying key focus areas for sustainability, including those in our supply chain.
- We have a Senior Director of Global Sustainability.
- We have an ESG Steering Committee comprised of senior leadership that meets regularly.

We have implemented the following measures to prevent and reduce risks of forced labour and child labour:

Desktop risk assessment

- We use a desktop risk assessment on priority suppliers that covers 80% of our direct spend to determine areas in our business and supply chains that are most at risk for forced or child labour.
- In 2023, the desktop risk assessment highlighted some exposure to geographic risks within our supply chain. The results were reviewed with internal stakeholders, including Global Category Managers where relevant, and additional actions have been undertaken to ensure correct policies and processes are in place with those suppliers at higher risk.



Supplier self-assessment

- MCC uses a supplier self-assessment questionnaire on forced and child labour.
- From the self-assessment, we have engaged with suppliers on corrective action planning in respect to their forced and child labour policies and measures in place to eliminate risks.
- We make provision for our contracted suppliers to hold their own suppliers to the same standards.
- As part of our contracting or vendor selection processes, we have incorporated specific prohibitions against slavery or servitude, forced labour, child labour and people trafficking in line with this policy.

Supplier Code of Conduct

- We have implemented a Supplier Code of Conduct which addresses forced labour and child labour, among other prohibited practices.

Purchase order T&C review

- We reviewed and updated our MCC Purchase Order Terms and Conditions policy to include compliance with our Supplier Code of Conduct as a requirement.

Generating awareness within the business



- Our Corporate Governance policies are publicly available at mcclabel.com/en/suppliers-and-ethics
- Employees can anonymously report on any Ethics violation via a toll-free number and via ethicspoint.com on our intranet.

Structure, Activities and Supply Chain

FD Canada is a Canadian company headquartered in Leamington, Ontario. It is a wholly-owned, indirect subsidiary of MCC, a Ohio corporation headquartered in Rosemont, Illinois USA. MCC’s activities are carried out through four operating segments, including Europe, Middle East and Africa Consumer Packaged Goods (EMEA), Asia-Pacific Consumer Packaged Goods (APAC), Americas F&B, Americas HPC Speciality and Wine & Spirits, and Global IML. FD Canada is included in the Americas F&B operating segment.

MCC’s supply chain consists of over 8,000 active global suppliers that provide goods and services to MCC. We view our suppliers as key to our sustainability efforts and strive to work with suppliers who commit to complying to our Supplier Code of Conduct and other key policies and procedures and share our commitment to ethical business conduct. Approximately 60% of MCC’s global suppliers are in the Americas.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

We have a comprehensive set of policies and procedures that articulate our values, ways of working and expectations of our team and suppliers. This policy framework, which is reviewed regularly, ensures that our team members and suppliers clearly understand our expectations, 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 MCC policies are those that are most relevant to preventing, mitigating and remediating risks of forced or child labour among our team members and workers in our supply chains:

Policy	Purpose
Global Code of Business Conduct and Ethics	Outlines expectations on our teammates for how they behave towards each other, our customers and the broader community. This is translated into over 20 languages.
Supplier Code of Conduct	Sets forth our expectations for our suppliers. Specifically, with respect to forced or child labour, it reads as follows: <i>Forced or Child labour. Supplier shall adhere to all laws, rules and regulations relating to forced or child labour, human trafficking and modern slavery. Supplier must not use any form of forced or bonded (including debt bonded) labour, indentured or involuntary prison labour, slavery or human trafficking. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility or unreasonable restrictions on entering or exiting supplier provided facilities. Any written employment agreements must be provided to Supplier’s workers in their native language. Supplier and agents shall not hold workers’ government-issued paperwork (e.g., ID, passport, work permit, etc.) unless holding is required by law. All work is voluntary and workers are free to leave work at any time or terminate their employment if reasonable notice is given in accordance with any applicable contract or law, and they shall not be required to pay employers’ or agents’ recruitment fees or other related fees for their employment</i>
MCC Purchase Order Terms and Conditions	Mandates that suppliers will not under any circumstances engage in or tolerate any slave or forced labour, child labour, human trafficking, corruption, or discrimination based on age, gender, race, marital status, nationality, religion, or sexual identity or orientation. Also requires that suppliers comply with the Supplier Code of Conduct.
Equal Opportunity Policy	Ensures that all persons seeking employment are treated fairly equitably and are not subjected to any form of unlawful discrimination or harassment.

Policy	Purpose
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.
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.
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.
Ethics Hotline Policy	MCC encourages the reporting of any matters which may be considered unethical, illegal, or an act of serious wrongdoing. MCC has a strict no-retaliation policy to protect anyone who makes a report in good faith.

With respect to due diligence relating to MCC’s suppliers, MCC asks suppliers about compliance with forced and child labour and other laws, reviews suppliers’ supply chains, refers suppliers to MCC’s Supplier Code of Conduct, and requires suppliers to certify compliance with our Supplier Code of Conduct. Approximately 90% of MCC’s purchasing spend is with long-standing multinational firms with programs similar to MCC’s to detect and prevent forced and child labour.

Parts of the Business and Supply Chains that Carry a Risk of Forced Labour and Child Labour and Steps to Manage that Risk

MCC evaluates its suppliers with respect to countries and goods that are at a higher risk for human rights violations. It minimizes the volume of goods and services sourced from these locations and engages in additional due diligence, such as personal visits to supplier facilities, as deemed appropriate.

MCC has not identified any instances of forced or child labour in its activities and supply chains for the financial year ended December 31, 2023. As such, no remediation efforts have been taken and MCC has not needed to take any measure to eliminate the use of forced or child labour. As such there is no loss of income to remediate with respect to the most vulnerable families.

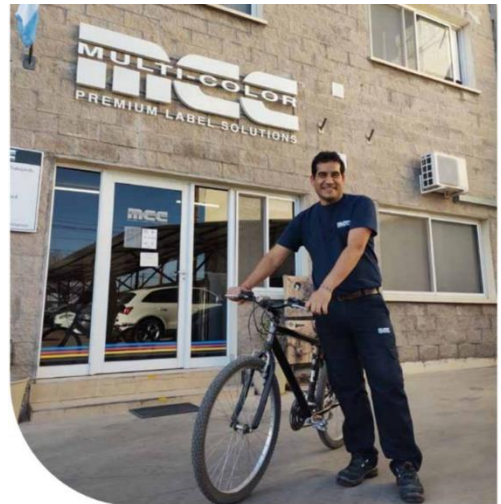
Training Provided to Employees on Forced Labour and Child Labour

As part of onboarding new employees and then annually thereafter, all MCC team members with access to MCC’s human resources information system (including FD Canada’s team members) are required to complete certain compliance trainings, as well as certify compliance with MCC’s Global Code of Business Conduct and Ethics.

In addition, team members in a supply chain-related function must complete annual supply-chain trainings which include modern slavery (forced labour and child labour).

Assessing Effectiveness in Ensuring that Forced Labour and Child Labour are Not Being Used in Our Business and Supply Chains

MCC works to identify and manage risks to its business, including by means of an enterprise risk management (ERM) program designed to identify and implement mitigating activities. ERM activities are reported quarterly to MCC's Audit Committee of its Board of Directors. Further, MCC has an ESG Steering Committee comprised of members of senior management that meets regularly to discuss sustainability-related topics including risks and reporting. In addition, our Chief Procurement Officer is involved in creating and implementing policies and procedures designed to ensure our supply chain is compliant with applicable laws and regulations and MCC's Supplier Code of Conduct.



Attestation

In accordance with the requirement of the Act, and in particular section 11 thereof, I attest that the Board of Directors of FD Alpha Canada Acquisition, Inc. has reviewed the information contained in this report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for purposes of the Act, for the reporting year ended December 31, 2023.

Stijn Billiet

Sr. Director, Global Sustainability

May 30, 2024

