

Workplace anti-harassment policy

Multi-Color Corporation is committed to providing a work environment that is free from all forms of harassment, discrimination and conduct that can be considered harassing, coercive or disruptive. Any offensive conduct directed at associates because of their sex, race, color, religion, age, disability, pregnancy, gender identity, sexual orientation, sex stereotyping, genetic information, gender expression, marital status, military status, national origin, ancestry; or discrimination or harassment based on any other characteristic protected by law is prohibited.

Any associate who feels that he/she is a victim of harassment or discrimination by any supervisor, management official, other associate, customer, client, or any other person in connection with employment at the Company is expected to report it promptly, regardless of who originates it or participates. Such misconduct will result in corrective action that the Company determines as an appropriate resolution of the matter. The corrective action against an offending associate could range, up to, and including, termination.

Reporting Procedure

Anyone who is the object of any such conduct or who observes any such activity should immediately report the matter to a member of management; including but not limited to, his/her immediate manager, department head, Manager of Human Resources, Plant Manager or any Corporate Officer, without fear of reprisal.

Retaliation

Multi-Color will not tolerate retaliation against an associate for reporting any type of unlawful discrimination, harassment, or other inappropriate behavior, for participating in an investigation or proceeding of discrimination, harassment or other inappropriate behavior. Any associate who reasonably and in good faith believes he or she has been retaliated against for any such activities or for cooperating in an investigation under these policies, should immediately report this to the Human Resources Department.

Investigation/Disciplinary Action

Each reported matter will be investigated promptly and thoroughly under the direct supervision of the Human Resources Manager or his/her designee. The investigation will be conducted as confidentially as possible. After the investigation is completed, a determination will be made by the Company. Appropriate corrective action, up to, and including, termination, will be taken if the Company deems that is the proper resolution of the matter. The person who brought the complaint forward will be notified when the process has been successfully concluded.

Explanation of Sexual Harassment

The Equal Employment Opportunity Commission (EEOC) defines sexual harassment as unwelcome sexual advances (verbal and/or physical) or the request for favors and other verbal and/or physical conduct of a sexual nature when:

- Submission to such conduct is either an explicit or implicit term of condition of employment (e.g., promotion, job assignment, overtime opportunity, wage increase);
- Submission to or rejection of the conduct is used as a basis for making employment decisions; or
- The conduct has the purpose or effect of substantially interfering with an individual's work performance or creating a hostile or offensive work environment.

Using and insisting upon good manners, professional behavior, and the exercise of good sense will go a long way in avoiding and preventing the inappropriate conduct covered by this policy. Any incidents that violate this policy should be reported immediately.