CLASSIC LABELS PACKAGING GROUP

Code of Ethics & Business Conduct

Purpose

Classic Labels Packaging Group (CLPG) is committed to conducting business with integrity, transparency, accountability, and respect for all stakeholders. This Code establishes the ethical standards and business practices expected of all employees, officers, contractors, consultants, and representatives acting on behalf of CLPG.

Scope

This Code applies to all CLPG personnel and business activities. We are committed to complying with all applicable laws and regulations in the jurisdictions where we operate. We also expect our suppliers, contractors, and business partners to comply with applicable laws and adhere to CLPG's Supplier Code of Conduct.

1. Integrity & Legal Compliance

We conduct business honestly, ethically, and in compliance with all applicable laws and regulations.

All employees and representatives must:

- Act with integrity and professionalism.
- Maintain accurate business records.
- Protect confidential and proprietary information.
- Comply with all legal, regulatory, and contractual obligations.
- Report suspected violations of this Code or applicable laws.

2. Respect, Inclusion & Equal Opportunity

CLPG is committed to maintaining a workplace that values diversity, inclusion, and equal opportunity. We prohibit discrimination based on race, color, religion, sex, gender, age, national origin, disability, veteran status, sexual orientation, gender identity, or any other legally protected characteristic. Employment decisions are based on qualifications, performance, and business needs.

3. Harassment-Free Workplace

CLPG maintains a zero-tolerance policy toward harassment, intimidation, bullying, or abusive conduct. All employees are expected to treat colleagues, customers, suppliers, and business partners with dignity, professionalism, and respect.

4. Health, Safety & Sustainability

CLPG is committed to providing a safe, healthy, and environmentally responsible workplace.

We will:

- Comply with applicable health, safety, and environmental regulations.
- Promote workplace safety and employee well-being.
- Support responsible environmental practices, waste reduction, recycling, and resource conservation.

- Advance sustainable packaging solutions through our Sustainable Advantage portfolio and supplier network.

The use, possession, or distribution of illegal drugs in the workplace is strictly prohibited.

5. Conflicts of Interest

Employees and representatives must avoid situations where personal interests may conflict, or appear to conflict, with CLPG's business interests. Potential conflicts of interest must be disclosed to management for review and resolution.

6. Anti-Bribery & Anti-Corruption

CLPG maintains a zero-tolerance policy toward bribery and corruption. No employee, representative, or third party acting on behalf of CLPG may offer, solicit, give, or accept anything of value to improperly influence a business decision or obtain an unfair advantage.

7. Gifts, Hospitality & Entertainment

Modest business courtesies may be accepted or provided when they are reasonable, infrequent, lawful, and do not influence business decisions. Cash gifts, gift cards, loans, kickbacks, or any item intended to create an obligation or conflict of interest are prohibited.

8. Fair Dealing & Responsible Business Practices

CLPG is committed to fair, honest, and ethical dealings with customers, suppliers, competitors, and employees.

We do not engage in:

- Fraud or deception
- Misrepresentation of facts
- Unfair competitive practices
- Misuse of confidential information

We expect our suppliers and business partners to uphold similar ethical standards.

9. Responsible Communications

Employees must communicate professionally and responsibly in all business communications, including email, social media, messaging platforms, and other electronic communications. Confidential information must be protected, and communications should reflect CLPG's values and professional standards.

Reporting Concerns

Anyone who becomes aware of a potential violation of this Code is encouraged to report the concern to management. CLPG prohibits retaliation against individuals who raise concerns in good faith.

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Approval

Steven Ayala, Chief Executive Officer & Founder

Signature: Steven J Ayala Date: 6/11/2026