

Anti-Slavery and Anti-Human Trafficking Policy

Our Commitments

Respect is one of Graphic Packaging International, LLC's ("GPI") core values. GPI and its subsidiaries, including Graphic Packaging International Europe UK Limited and other relevant GPI group companies¹ (collectively "GPI", the "Group", the "Company", "we" or "our") are committed to ensuring that people are treated fairly and with dignity and respect throughout the Company and the communities in which we operate. Therefore, GPI has zero tolerance for "Modern Slavery" - a term used in the Modern Slavery Act 2015 (the "Act") to capture the offenses of "slavery, servitude and forced or compulsory labour" and "human trafficking". Modern Slavery is a crime of global proportions that exists in every region of the world and in every type of economy. As a leader in packaging design and innovation that serves hundreds of the world's most recognized brands, GPI has a responsibility to be alert to the risks, however small, in our business and in our supply chain. Thus, this document sets out GPI's policy for preventing occasions for Modern Slavery to occur within our businesses or supply chain.

We are firmly committed to acting ethically in all our business dealings. GPI acknowledges its responsibility to complying with the Act and is devoted to implementing and enforcing effective controls and procedures to ensure Modern Slavery is not taking place in GPI's own business or in those of its suppliers and to respond quickly to such matters if they are identified.

This policy applies to all persons working for GPI in any capacity ("GPI Employees"). GPI expects equivalent standards of conduct from all persons acting on its behalf, such as suppliers, business partners, external consultants, and contractors.

Policy

Steps for the Prevention of Modern Slavery

GPI is committed to ensuring there is transparency in its business relationships and in its way of tackling Modern Slavery throughout its supply chains, in compliance with the Act. GPI wishes to work with suppliers whose standards with respect to Modern Slavery, diversity, labor practices, safety and freedom of association align with those of the Group. GPI also expects its suppliers to ensure that their own suppliers keep to and uphold the same high standards.

In keeping with these commitments, many of our policies and disclosures reflect our efforts to acting in an ethical and responsible manner in our business dealings and to implementing and enforcing adequate procedures and controls to ensure Modern Slavery is not taking place anywhere in our business or supply chains. Such policies and disclosures include:

- Code of Conduct
- Human Rights Policy
- Child Labour Remediation Policy
- Whistleblower Policy

¹ This policy applies to all Graphic Packaging International UK businesses which fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

- Global Supplier Code of Conduct
- California Transparency in Supply Chains Act Declaration
- Policy Statement on Conflict Minerals
- Health, Safety, and Environment Policy
- Anti-Bribery and Anti-Corruption Policy

("Policies")

Our hiring, training, compensation, and other employment practices are free from discrimination. We prohibit workplace harassment and cannot tolerate bullying, intimidation, or any conduct that may be considered harassment or lead to harassment or creates a hostile environment for anyone. In addition, GPI is a member of SEDEX, a not-for-profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Being the largest collaborative platform for sharing and viewing information on labour standards, health and safety, the environment and business ethics, SEDEX helps GPI to reduce risk and improve supply chain practices. In order to ensure that suppliers in GPI's supply chain comply with our ethical standards, we require critical suppliers to fill in and sign a Supplier Questionnaire as part of our due diligence programme. To outline our global minimum expectations from our suppliers in the areas of business integrity, anti-corruption, human rights, labour practices, health and safety, and environmental management, we have also developed and published our Global Supplier Code of Conduct.

As a supplier of goods and services in the UK GPI has an obligation under the Modern Slavery Act 2015 to publish an annual statement setting out the steps that we have taken during the financial year to ensure that slavery or human trafficking is not taking place in any of our supply chains or in any part of our business, or a statement that we have taken no such steps. The annual statement will be approved by the Board of Directors and signed by a director authorized by the Board of Directors and published on our website.

Responsibility for the Policy

GPI's senior management has overall responsibility for ensuring that this policy and its implementation comply with Company's legal and ethical obligations.

The Company's Human Resources Department has day-to-day responsibility for implementing this policy, monitoring its effectiveness, keeping up to date with any new requirements entering into force and examining internal control procedures to ensure they are effective means for countering Modern Slavery.

The Law Department is responsible for answering any queries about the policy and for giving adequate trainings to management and employees on the policy and on the crime of Modern Slavery.

Compliance with this Policy and Reporting

All GPI Employees are expected to read and to comply with this policy and to insist others to follow it as well. Any employee who has questions about this Policy or information or concerns of suspected Modern Slavery associated with GPI or our suppliers shall promptly inform his or her local or assigned human resources representative, corporate human resources, or the law department. Employees may also report concerns via the Graphic Packaging Business Conduct Alertline via its website at <http://www.gpibusinessconductalertline.ethicspoint.com> or via the toll-free number for your country. The Graphic Packaging Alertline is available 24 hours per day.

External to the Group people can also raise any concern or suspicion of Modern Slavery in any part of our business or related supply chain via the Graphic Packaging Business Conduct Alertline via its website at <http://www.gpibusinessconductalertline.ethicspoint.com> or by writing an email to GeneralCounsel@graphicpkg.com.

GPI encourages openness and will support anyone who raises genuine concerns in good faith under this policy. We do not tolerate and are committed to ensuring that no retaliation takes place against anyone who reports in good faith their concerns that Modern Slavery is or may be taking place in any part of our own business or in any of our supply chains.

Modern Slavery Awareness and Training

GPI Employees are required to undertake regular training on Antitrust, the Company's Code of Conduct and the Anti-Bribery and Anti-Corruption Policy to ensure they are aware of the continued need for upholding high standards of corporate responsibility in their day-to-day work. We also believe that it is our duty to continue communicating and raising awareness of the important issue of Modern Slavery. Thus, additional training courses focusing on Modern Slavery and other human rights issues are provided as necessary throughout the Group.

Enforcement

Any employee who violates this policy or any related law will be subject to appropriate disciplinary action, up to and including dismissal. Any employee who is aware of another employee's violation of such law or this policy, but does not report the same, will also be subject to appropriate disciplinary action.

We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

Graphic Packaging International, at its sole discretion, reserves the right to amend or modify this Policy at any time and for any reason.