

GLOBAL SUPPLIER CODE OF CONDUCT

Purpose and Scope

At Graphic Packaging International, LLC (Graphic Packaging International), we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Graphic Packaging International has developed a Global Supplier Code of Conduct (“**Supplier Code**”) to set out our global minimum expectations in the areas of business integrity, anti-corruption, labor practices, associate health and safety, and environmental management. Graphic Packaging International’s Supplier Code is intended to complement Graphic Packaging International’s Global Code of Conduct and the company’s other policies and standards referenced therein.

All Suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do business with Graphic Packaging International entities worldwide (“Suppliers”) are expected to follow this Supplier Code or any all relevant laws and policies that may apply to the specific services provided by Suppliers to Graphic Packaging International. Suppliers are also expected to communicate and apply this Suppliers Code and relevant policies throughout their supply chain. Unless otherwise expressly agreed to in writing a Supplier’s acceptance of a purchase order or supply of goods or services constitutes that Supplier’s acceptance of the terms set forth in this Supplier Code.

Graphic Packaging International reserves the right to cease doing business with any Supplier that does not share its commitment. All documentation that a Supplier may need to verify compliance with this Supplier Code and with all the applicable laws and regulations of the country where the materials and products are produced must be maintained on-site at the facilities in which the materials and products are processed, produced or manufactured. All such documentation shall be made available to Graphic Packaging International, or its authorized representatives, upon request.

This Supplier Code may be enforced or amended by Graphic Packaging International, at its discretion.

Business Conduct Principles

Graphic Packaging International expects its suppliers to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

1. Maintain awareness and comply with all local and national laws and regulations applicable to the Suppliers’ operations.

Graphic Packaging International is committed to high standards of ethical behavior and compliance with laws and regulations are essential to protecting the reputation and long-term success of our business. We are committed to the highest standards of integrity, honesty, openness and professionalism in our global activities and have the highest respect for local, national and international laws and regulations. We expect Suppliers to behave ethically and appropriately in all dialogue as well as act in compliance with legal and industry requirements and seek to implement best practices in their industries.

2. Compete fairly for Graphic Packaging International’s business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Graphic Packaging International is committed to conducting business legally and ethically within the framework of a free enterprise system and abides all applicable anti-trust and competition laws in all countries in which we operate.

In addition, corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Graphic Packaging International specifically recognizes and expects its Suppliers to comply with the standards of the Foreign Corrupt Practices Act and the UK Bribery Act.

Graphic Packaging International requires its Suppliers to comply with all applicable sanctions, export control and anti-boycott laws, regulations, orders, directives, designations, licenses and decisions of the United Nations, the European Union, the United Kingdom and the United States, and anti-money laundering laws and regulations in all applicable jurisdictions. Further, Graphic Packaging International prohibits its Suppliers from directing their proceeds of doing business with us to benefit persons, entities or countries that are targeted by such laws.

- 3. Encourage a diverse workforce free from discrimination, harassment or any other form of abuse.**
Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience. Discrimination based upon race, color, religion, gender or sex (including pregnancy), sexual orientation, age, gender identity, genetic information, disability, ancestry, national origin, marital status, and veteran or military status shall be strictly prohibited.
- 4. Treat employees fairly, including with respect to wages, working hours and benefits.**
Suppliers shall comply with all applicable legal and regulatory requirements and will generally apply sound employee relations practices. Working hours, wages and benefits will be consistent with laws and local industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.
- 5. Prohibit all forms of forced or compulsory labor, including human trafficking and slavery.**
Suppliers shall not obtain employees or contractors through human trafficking or use coerced, forced, prison or slave labor. All work must be conducted on a voluntary basis and employees are free to withdraw from the employment relationship with reasonable notice. The use of physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control is prohibited.
- 6. Prohibit the use of child labor.**
Suppliers must maintain official and verifiable documentation of each employee's date of birth or be able to confirm the same. In no instance shall a Supplier permit children under the age of 18 to perform work that exposes them to undue physical risks that can harm their physical, mental, or emotional development or improperly interfere with their schooling needs.
- 7. Respect employees' right to freedom of association and collective bargaining.**
Consistent with applicable law, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations.
- 8. Provide safe and healthy working conditions.**
Suppliers shall proactively manage health and safety risks and strive for an incident-free environment where occupational injuries and illnesses are prevented. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industries. Suppliers also shall provide protective equipment to workers in accordance with their job requirements, potable drinking water, adequate restrooms, fire exits and essential fire safety equipment, emergency aid kits, and access to emergency response services, including environmental, fire and medical.
- 9. Demonstrate a commitment to preserving the environment and complying with all applicable environmental laws and regulations.**
The potential environmental impacts of daily business decision-making processes should be considered along with opportunities for conservation of natural resources, recycling, source reduction and pollution control to ensure cleaner air and water and to reduce landfill wastes.
- 10. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices and adhere to data privacy laws.** Supplier is required to maintain accurate books and records that reflect actual and legitimate transactions and payments. The creation of falsified, inaccurate, incomplete or misleading documents is strictly prohibited. Upon request Supplier shall make such records available to Graphic Packaging International for verifying its compliance with this Supplier Code.

Supplier must comply with applicable data privacy and data security laws and regulations when processing personal information of anyone they do business with, including suppliers, customers, consumers and employees. In particular, Supplier must only process the minimum amount of personal data necessary to perform its obligations to Graphic Packaging International and only for the purposes set out in its agreement with Graphic Packaging International. Supplier must keep personal data confidential and secure at all times.

- 11. Deliver products and services meeting applicable quality and food safety standards.**
 Graphic Packaging International is committed to producing high-quality and safe products across all our brands. Suppliers involved in any aspect of developing, handling, packaging or storing our products are expected to:
- Know and comply with the product quality standards, policies, specifications and procedures that apply to the products produced at your location
 - Follow and adhere to good manufacturing practices and testing protocols
 - Comply with all applicable federal, state, and local food safety laws and regulations
 - Report issues immediately to Graphic Packaging International that could negatively affect the quality or public perception of a Graphic Packaging International product
- 12. Support compliance with the Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Graphic Packaging International.**
 To conduct business with Graphic Packaging International, Suppliers must enter into contracts and issue purchase orders that mandate compliance with the Supplier Code. With prior notice, Graphic Packaging International may conduct reasonable audits to verify Supplier's compliance with the Supplier Code.
- 13. Observe Graphic Packaging International's policies regarding gifts and entertainment and conflicts of interest when dealing with Graphic Packaging International employees.**
 Suppliers are prohibited from providing or offering gifts to Graphic Packaging International employees that could inappropriately influence Graphic Packaging International's business decisions or gain an unfair advantage.
- 14. Certifies that the products it sells to Graphic Packaging do not contain Conflict Minerals or, if such products do contain these minerals, that they are conflict free.**
 Graphic Packaging International's goal is to use only those Conflict Minerals (meaning gold, cassiterite, columbite-tantalite and wolframite, together with their derivatives tin, tantalum and tungsten) that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. These Conflict Minerals are referred to herein as being "conflict free." To achieve this goal, Graphic Packaging International will exercise due diligence with its suppliers consistent with the framework set forth in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Mineral from Conflict-Affected and High-Risk Areas. Graphic Packaging International expects our suppliers to cooperate in providing information to confirm that the Conflict Minerals in our supply chain are conflict free. Graphic Packaging International strongly prefers to purchase from suppliers who will certify that their products do not contain Conflict Minerals or, if their products do contain these minerals, that they are conflict free. Accordingly, Graphic Packaging International will, where feasible, purchase only from those suppliers who can certify that their products do not contain Conflict Minerals or that the Conflict Minerals used therein are conflict free. Supplier certifies via this registration process that the products it sells to Graphic Packaging International do not contain Conflict Minerals or, if such products do contain these minerals, that they are conflict free.
- 15. Report suspected violations of the Code.**
 Supplier's employees or contractors in the United States may report suspected violations of the Supplier Code to the Graphic Packaging International Alertline at 1-866-898-3750. To find phone numbers outside the United States, or to report a suspected violation online for any country, go to:
<https://secure.ethicspoint.com/domain/media/en/gui/30747/index.html>

The Alertline is available worldwide on a 24/7 basis. All reports are treated as confidential, whether provided through telephone or online format, and you may remain anonymous where permitted by law.

Any violation of the Supplier Code shall be considered as a material breach by the Supplier, and Graphic Packaging International reserves the right to take legal actions, including suspending or terminating the business relationship.

Please sign below:

Company Name: _____

Authorized Signature: _____

Printed Name/Title: _____

Date: _____