



GLOBAL TRANSPARENCY IN SUPPLY CHAINS ACT STATEMENT ON HUMAN TRAFFICKING AND ANTI-SLAVERY¹

At Graphic Packaging, our Core Values of Respect, Integrity, Accountability, Teamwork, and Relationships are imbedded into our **Code of Conduct** and govern how we conduct business across the globe. We are committed to ensuring that people are treated fairly and with dignity and respect throughout our Company, our supply chain, and in the communities where we operate. This commitment extends to protecting human rights; the eradication of slavery and human trafficking; equality among people; employee well-being and security; personal freedom from persecution; privacy; and economic, social, and cultural freedom.

This report outlines the steps the Company takes to prevent and reduce the risk that modern slavery, forced or compulsory labor, human trafficking, and child labor, pose to our supply chain.

I. VERIFICATION

A. Policies

Our **Code of Conduct** is the cornerstone of our compliance program, and addresses everything from the Company's Core Values to how we conduct business, including but not limited to topics such as discrimination, harassment, anti-corruption, and human rights. The Code of Conduct was most recently updated in late 2024 and is distributed to all employees. To ensure compliance with the Code of Conduct and ethical practices around the globe, all Graphic Packaging employees are trained on the Code of Conduct annually.

In addition to the Code of Conduct, several global policies have been established codifying Graphic Packaging's efforts to ensure no modern slavery exists within our Company or supply chain. Such policies include the following: [Anti-Harassment and Anti-Discrimination Policy \(Global\)](#), Revised 2023; [Global Anti-Slavery and Human Trafficking Policy](#), Revised 2023; [Child Labor & Remediation Policy \(Global\)](#), Revised 2023; [Whistleblower Policy \(Global\)](#), Revised 2024; [Health, Safety and Environmental Policy](#), Revised 2023; [Human Rights Policy \(Global\)](#), Revised 2025; [Global Supplier Code of Conduct \(GSCC\)](#), Revised 2024; [Sustainability Policy \(Global\)](#), Revised 2025; and our Global Transparency in Supply Chains Act Declaration, Revised 2025.

Graphic Packaging has been a participant to the UN Global Compact since 2021 and is committed to incorporating the 10 principles of the compact into its business operations. Our Code of Conduct, Human Rights Policy, Child Labor and Remediation Policy, and Global Supply Chain Code of Conduct encompass the international human rights principles set forth in the U.N. Guiding Principles on Business and Human Rights, the U.N. Universal Declaration of Human Rights and its two corresponding covenants, the International Bill of Rights, the U.N. Conventions on the Rights of the Child, and the U.N. Convention on the Elimination of Discrimination against Women. Graphic Packaging's approach to its business operations is informed by the OECD Guidelines for Multinational Enterprises, the ILO's 1998 Declaration on Fundamental Principles and Rights at Work, and the UNGC.

¹ This Report complies with the California Transparency in Supply Chains Act of 2010, Civil Code Section 1714.43.

The above-referenced policies are available at our Disclosures & Company Policies section on our website and hold each of us at Graphic Packaging and our suppliers accountable to: maintain work environments that protect the human dignity of all; ensure all business and working relationships are never exploitive or corrupt; and provide the means to deal with situations in conflict with our policies. We review and update (as applicable) the Code of Conduct and our other global policies every one to three years.

B. Practices

Health and safety	We are committed to providing a work environment that encourages and promotes wellness and safety for our employees, contractors, suppliers, visitors, and neighboring communities.
Equal opportunity and fair treatment	We do not discriminate based on national or ethnic origin, place of residence, gender, gender identity, sexual orientation, pregnancy, color, religion, ancestry, age, disability, marital status, genetic information, political affiliation, veteran/military status, and any other status protected by applicable law. This applies to anyone we employ, as well as anyone who applies for employment with us.
Respectful behavior	We do not tolerate conduct that would lead to a hostile, intimidating, or offensive work environment. For more details, see our anti-harassment and anti-discrimination policy.
Fair and safe working environment	We respect our employees' right to work free from persecution and abusive or otherwise unfair treatment. We are committed to providing a work environment free from violence, threats of violence, harassment, and physical intimidation or coercion. We implement security safeguards, as necessary, to protect our employees, contractors, and visitors to our facilities.
Wages	We comply with applicable national, provincial, and local regulations related to wages, work hours, overtime, and benefits. We also are committed to paying employees in a fair and equitable manner for the work they perform.
Workers' rights	We recognize and respect employees' right to choose whether to join a labor union, participate privately in trade associations, and collectively bargain in accordance with local or national law.
Voluntary labor	We do not knowingly engage in forced, compulsory, or bonded labor, and we do not threaten workers or restrict their movement.
Child labor	We do not employ workers in violation of any applicable national, provincial, or local regulations governing age of employment. In addition, we do not employ workers in violation of the mandatory school age set by any country.

Privacy	We respect the privacy of personally identifiable and other information of our employees, customers, suppliers, and business associates. We are committed to proper handling of this information in accordance with our privacy policies, contractual obligations, and all applicable privacy laws.
Suppliers	We seek to work with suppliers whose standards with respect to human rights align with our own. Our goal is to eliminate human trafficking from our supply chain and to use only those products that do not finance or benefit armed groups in the Democratic Republic of Congo and nine adjoining countries. The Company's expectations for suppliers are fully set forth in our GSCOC.
Transparency	We report our human rights practices annually through our Canadian, U.K. and Australia Modern Slavery Act Transparency Reports/Statements, the California Transparency in Supply Chains Act Declaration, Conflict Minerals Report, and our annual Impact Report.

II. AUDITS AND CERTIFICATION

Graphic Packaging conducts a tiered system of due diligence activities to identify risks and prevent human rights impacts across our global business operations. We use the Supplier Ethical Data Exchange (Sedex) platform, an online collaborative platform that enables us to conduct periodic, online self-assessments and, every three years, to complete a social responsibility Sedex Member Ethical Trade Audit (SMETA) to ensure compliance with applicable local, state, or national/regional requirements, as well as Graphic Packaging policies.

Sedex has developed a rigorous four-pillar framework that assesses a site based on the organization's standards for labor, HSE, and business ethics. We use the Sedex RADAR risk assessment tool to screen countries where we have core business operations. The tool combines country- and sector-level risk data based on independent and reputable sources to assess the 14 risk topics defined under the four Sedex pillars, including human and labor rights risks (e.g., forced labor, human trafficking, child labor, freedom of association, right to collective bargaining, equal remuneration, and discrimination). Country risk indicators derive from publicly available sources and are chosen according to their coverage, reliability, comparability, and relevance.

Graphic Packaging is committed to conducting human and labor rights due diligence assessments across our operations and has an internal goal that all facilities complete annual self-assessment and comply with a social responsibility compliance audit once every three years. We currently conduct SMETAs at packaging locations and will be adding our paperboard manufacturing facilities and a machinery plant to the program in 2025. We are also considering including corporate offices and R&D facilities in the program as well. Newly acquired manufacturing facilities must complete their first online self-assessment within one year and a SMETA audit within three years of joining the Company. All audits are conducted by a Sedex approved, independent third-party auditor.

We train our salaried employees to detect modern slavery and child labor risks via our annual compliance training program. We also use a sustainability and risk intelligence tool, which scrubs vendors for Modern Slavery (powered by the Global Slavery Index, Social Hotspot Database, Dow Jones), Sanctions (powered by Dow Jones), and Adverse Media (Dow Jones Media), to vet and monitor our suppliers for forced or compulsory labor risks and adverse media concerns. Work is underway to further automate the screening process and monitor all global suppliers in the future.

Should we ever become aware of violations in our value chain, we immediately address the issue with our direct partners and urge them to end the practices immediately. We reserve the right to terminate a business relationship if a supplier fails to meet these obligations.

III. INTERNAL ACCOUNTABILITY STANDARDS AND PROCEDURES

A. Governance

Graphic Packaging's Board of Directors oversee the Company's global compliance strategy and objectives, including the Company's activities and related risks relevant to human rights. The Board of Directors reviews all significant policies and commitments and reviews the overall compliance program and corporate risk assessment annually. We also have a Compliance & Risk Committee (CRC) comprised of a broad-reaching team of compliance experts who manage the adequacy and effectiveness of its compliance risk management. Members of the CRC include the EVP, General Counsel (GC); EVP, Human Resources; SVP, Chief Information Technology; SVP, Chief Audit, Risk and Compliance Office (CCO); the VP & Chief Labor & Employment Counsel (VPCLEC); VP & Assistant General Counsel; VP, Legal (EMEA); SVP and Chief Accounting Officer, and the VP, HS&E.

Our CCO, GC and VPCLEC are responsible for developing and administering our global human rights program, and our German Human Rights Officer is responsible for country specific human rights program requirements in Germany. Together they monitor developments in applicable legal and regulatory standards, as well as industry and general best practices. Our Employee Relations group is responsible for investigating high-risk concerns that are reported to our Global Alertline and escalating the same to the Compliance Office and the VPCLEC as needed. With oversight from the CRC, the CCO and VPCLEC periodically review human rights risks, conduct risk assessments, review internal audit results, monitor trends, and evaluate the effectiveness of relevant human rights programming. When needed, human rights matters are elevated to the executive leadership team and Audit Committee of the Board of Directors by the General Counsel or CCO.

Members of the CRC and their teams work very closely with the VP, Chief Sustainability Officer, the VP Procurement, and the VP Supply Chain Sustainability on third-party risk management and to ensure that all relevant policies, training, and initiatives comprising the human rights program are implemented throughout GPI's supply chain to minimize the risk of forced labor and other human rights risks.

The VP, Chief Sustainability Officer leads the development and execution of the Company's sustainability strategy and initiatives along with an interdisciplinary team of experts that includes senior leaders in Procurement, Legal, and Human Resources. This team engages with other stakeholders to review critical environmental, social, and governance issues and enhance the Company's sustainability efforts.

B. Reporting Mechanisms

Employees, suppliers, and customers may contact a local or regional HR representative; our legal, internal audit or compliance departments; or our confidential, 24-hour Alertline to ask questions about our human rights policy or report concerns or walk-ins. The Alertline is maintained by a third-party provider, and complaints may be made online or via country-specific toll-free telephone numbers. Complaints or inquiries are assigned to the German Human Rights Officer or trained members of the Company's Employee Relations, Internal Audit, Legal or Human Resources teams for investigation. Investigations must be completed in 10, 15 or 20 business days, depending on severity. All stakeholders are informed about the outcome of the investigations and any related corrective actions. The Company does not tolerate retaliation for reporting a complaint on the Alertline, and anonymous reports are welcome.

Employees are informed about the Alertline through postings in our facilities, the Code of Conduct, the Company websites, the Global Whistleblower Policy, and other policies. They also receive information about filing complaints via the Alertline during annual compliance training and occasional notices. Suppliers are notified about the availability of the Alertline via the Company's public website and the Global Supplier Code of Conduct. Employees who fail to report a violation of the Company's policies, including, but not limited to the prohibition against forced labor, human trafficking, and child labor, are subject to discipline, up to and including termination.

IV. TRAINING

Graphic Packaging recognizes that the management of human rights risks, including Modern Slavery, requires continuous capability building and raising awareness of teams across the Company. We use technology to advance the learner experience. We offer compliance training initiatives, hourly technical training, and leadership development components. Graphic Packaging's employees across the globe complete annual training on our Code of Conduct, during which they were reminded of our Core Values and prohibition against discrimination and harassment. We also ensure our employees can identify the early signs of human rights abuses and modern slavery in our business and supply chain by providing targeted human rights/modern slavery training to our salaried employees across the globe.

V. LOOKING AHEAD

Graphic Packaging is making great strides to improve our initiatives pertaining to the eradication of modern slavery, as reflected in the myriad of new and updated policies and procedures reflected in this report, our increased usage of the Sedex platform for self-assessments, and the implementation and use of other risk assessments. Our goal is to be Better, Every Day. We will do this by continuing to update our policies and procedures to comply with applicable ethical and legal requirements pertaining our operations and supply chain. In addition, we plan to increase our scrutiny and assessment of suppliers in our supply chain across the globe to ensure that they comply with our Core Values of Integrity, Respect, Accountability, Teamwork, and Relationships.